

#### **PROJECT TEAM**



# Lower Connecticut River Valley Council of Governments









#### **TONIGHT'S AGENDA**

#### 1. Introduction

- Regional Housing Plan & Municipal Annexes
- What is Affordable Housing and Affordable Housing Plans?
- What is does this mean in Killingworth?

#### 2. Existing Conditions Related to Housing

- Zoning / Planning / Infrastructure
- Available Land / Buildable Land / Suitable Land
- Demographics / Housing Trends
- 3. Housing Needs Assessment
- 4. Potential Strategies & Feedback



#### **TONIGHT'S AGENDA**

#### Your primary role tonight is to:

- Learn more about affordable housing and why it is important to your community
- Provide us with input on potential affordable housing strategies for your community
- Ask questions you may have on the subject. Please type them in the chat - questions will be answered at the end of the workshop

Live Polling will be conducted later so have your phone or a 2<sup>nd</sup> web browser window open





### INTRODUCTION



#### RELATIONSHIP TO REGIONAL HOUSING

#### **REGIONAL HOUSING PLAN**

- Follow up to Regional Plan of Conservation and Development (RPOCD)
- Completed in two parts:
  - Regional Housing Analysis
    - Focus on region-wide trends / challenges
    - Recommendations focus on how the region can assist the towns in housing coordination and creation
  - Municipal 8-30j Plans (Annexes)
    - Focus on town specific affordability conditions and strategies



Each part of the process will inform the other



#### WHAT IS AN AFFORDABLE HOUSING PLAN?

Under CGS 8-30j, updated in 2017, all communities in Connecticut are required to create and adopt an affordable housing plan by June 2022 and update it every five years.

- Bottom-up approach to increase the State's affordable housing supply
- Show actionable progress towards meeting State goals
- Each community decides what strategies are best for their community



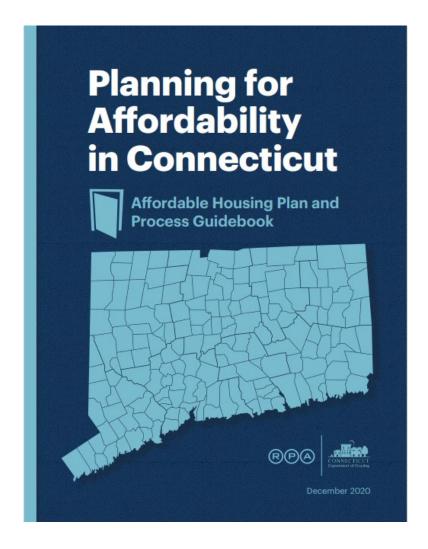
# This is an opportunity to create an Affordable Housing Plan that reflects **Killingworth's** values and priorities



#### **AFFORDABLE HOUSING PLAN GUIDANCE**

Released by State Department of Housing in December 2020

- Create a community values statement
- Conduct a housing needs assessment
- Evaluate local land use and zoning to identify barriers to affordable housing development
- Develop plan goals, strategies and actions
- Apply best practices to implement





#### WHAT IS AFFORDABLE HOUSING?

## Affordable housing is typically defined as housing that costs no more than 30% of a household's income.

- Under 8-30g, "affordable housing" is housing which, due to deed restriction or subsidy, costs a low-income household no more than 30% of their income.
  - A goal of state law is for 10% of housing units in every town to be "affordable," per this
    definition
  - "Low-income household" is a household making less than 80% of state or Area Median Income (AMI), whichever is less. In Killingworth, Area and State Median Income limits are the same.
  - A family of 4 making <\$79,900 per year or an individual making <\$59,950 per year in Killingworth would qualify as low-income based on AMI.
  - Housing costs include rent or mortgage payments, property taxes, utilities, HOA fees, and maintenance costs.
- Income-based calculation. Does not include wealth, assets, or benefits.

#### **Maximum Monthly Housing Budget**



**\$1,398/month** for an individual \$59,950 annual income





# COMMUNITY SURVEY RESULTS



#### **ABOUT THE RESPONDENTS**

- Ran through September 2021
  - Left open through 2021 but did not receive much subsequent response
- 619 responses unique IP addresses
- 47% of respondents have lived in Killingworth for 20+ years, 25% have lived in town for 10 to 20 years
- 94% live in single family detached homes
- 95% own their home
- 58% are couple households with children in residence
- 27% are empty nesters
- Older adults are oversampled compared to town population (60% 55+ vs. 37% in Census)
- 33% are retired
- 59% of respondents live in 1- or 2-person households higher than the whole town (55%)
- 64% report over \$100,000 in annual household income



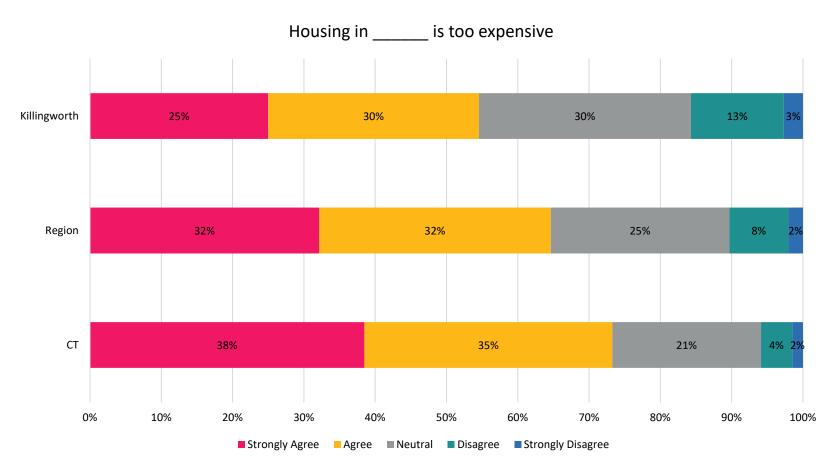
#### **ABOUT THE RESPONDENTS**

- 61% see themselves having the same sized household in 5 years
- 70% of respondents see themselves living in their current home 5 years from now
- 25% are likely looking to downsize in 5 years
  - into a smaller single-family home, condo/townhome, multifamily, senior living, ADUs
- 42% of respondents are aware of households who would benefit from more affordable housing in the community.
- 38% know some one who struggles with housing costs
- Only 16% personally struggle with housing costs
- Only 31% are aware of affordable housing
  - Feedback Loop If community lacks options, people seeking those options will leave/not move in, and respondents would not know them.



#### **HOUSING NEEDS**

- 73% agree housing in CT is too expensive
- 64% agree housing in the Region is too expensive
- 55% agree housing in Killingworth is too expensive

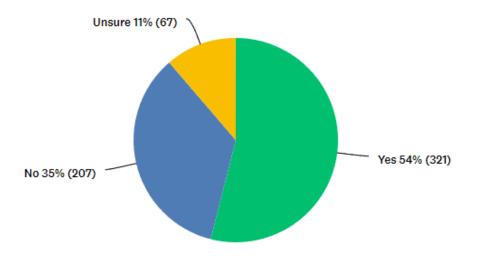


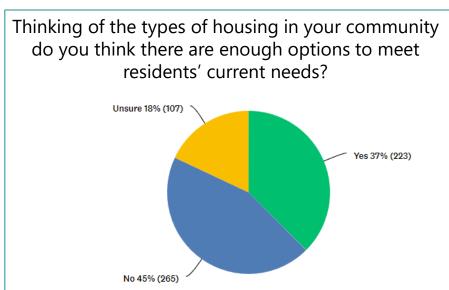


#### **HOUSING NEEDS**

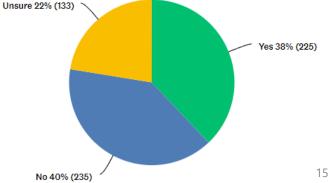
- 54% think housing is an important component in community longevity
- 45% do not think that the current housing options available meet residents' needs
- 40% do not think the existing housing stock is adequate to satisfy future market demands

Do you think affordable or attainable housing is an important component of your community's longevity?





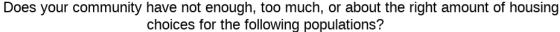
Do you think that the existing housing stock is adequate to satisfy future market demands?



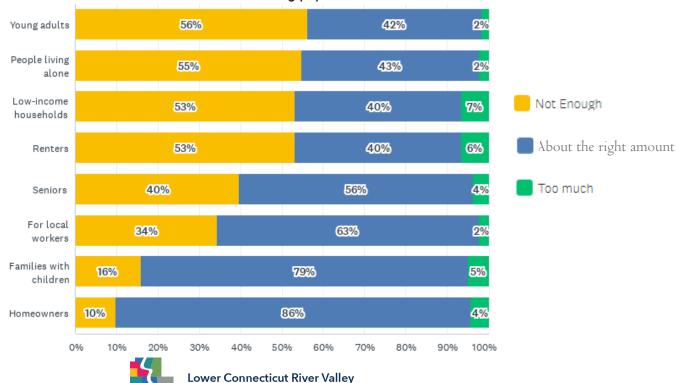


#### **HOUSING CHOICES**

- Respondents most frequently cited that there are not enough housing choices for:
  - Young Adults (56%)
  - People living alone (55%)
  - Low-income households (53%)
  - Renters (53%)
- General agreement that Killingworth has about the right amount of housing for families with children and homeowners.



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#### POTENTIAL BENEFITS OF HOUSING DIVERSITY

- 37% (218) respondents said housing diversity would have a positive impact.
  - 40% of respondents said housing diversity would have a negative impact.
- When asked what the benefit of housing diversity would be in Killingworth,
   164 respondents identified at least one benefit.

#### **Top Benefits**

- Increased diversity of residents (socioeconomic, cultural, racial, age, etc.)
- 2) Enable seniors to age in place
- 3) Enable young people to remain in town
- 4) Enable employees in Killingworth to live where they work
- 5) Create opportunities for lower-income residents
- 6) Improve the community and its longevity







# EXISTING CONDITIONS: PLANNING & ZONING REVIEW

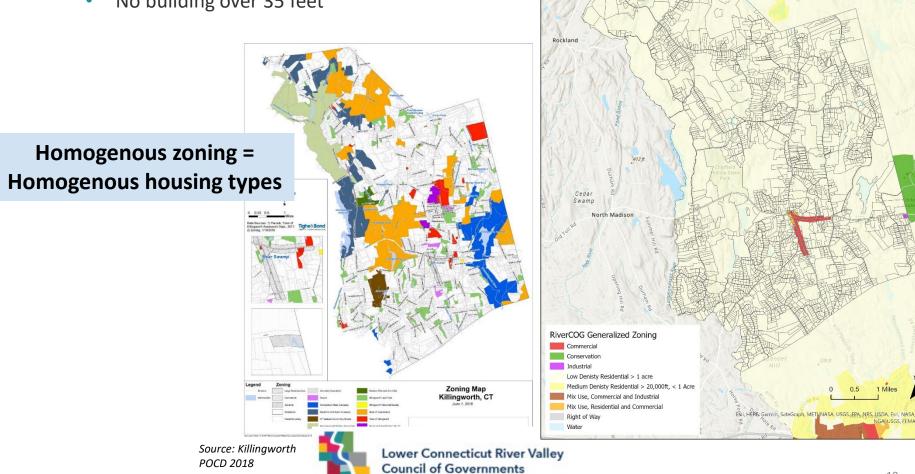


#### **ZONING**

- Only 1 type of residential district: "Rural Residence District"
  - Adopted under different market and environmental conditions

Soil based zoning more restrictive than Health Department requirements

- Single or Two -family
- Minimum lot area 2 acres
- No building over 35 feet



#### **INFRASTRUCTURE & BUILDABLE LAND**

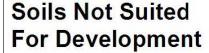
 Most of Killingworth's residents rely on individual wells and septic systems

> Requires well-draining soil and a minimum amount of land to be viable – limiting the number of homes the land can support

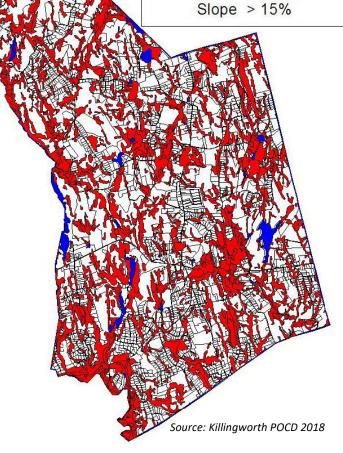
 Not all the land in town can be used for development. Restrictions on development include:

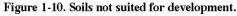
> Environmentally sensitive areas such as watercourses, wetlands, and their buffers

- Steep slopes and flood zones
- Aquifer protection areas, public water supply areas, and protected open space



Wetland Soils Farmland Soils Slope > 15%







#### **AVAILABLE LAND**

#### Limited available land

 More than 5,000 acres (>21%) is committed to open space, including both state forest lands and water company land.

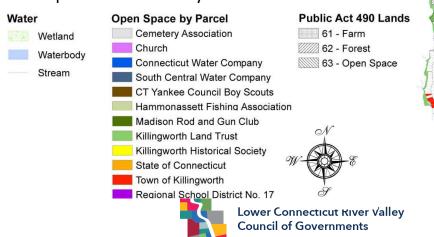
 Killingworth has more land set aside as committed open space than any other town in the Region.

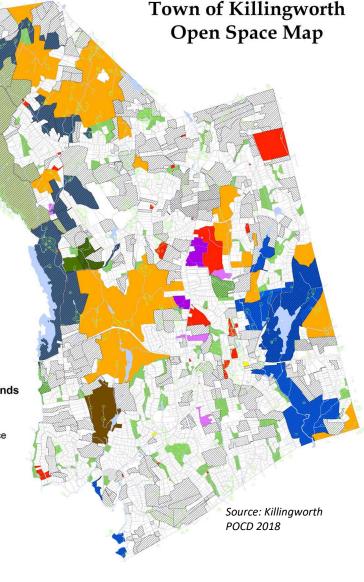
Over half of the land area, is in private ownership.

 Largely Built Out - Much of the development that has taken place has been on land most suited for development.

> Remaining undeveloped land contains inland wetlands, steep slopes, and ledge and is not suited for development.

Any new development would likely be infill

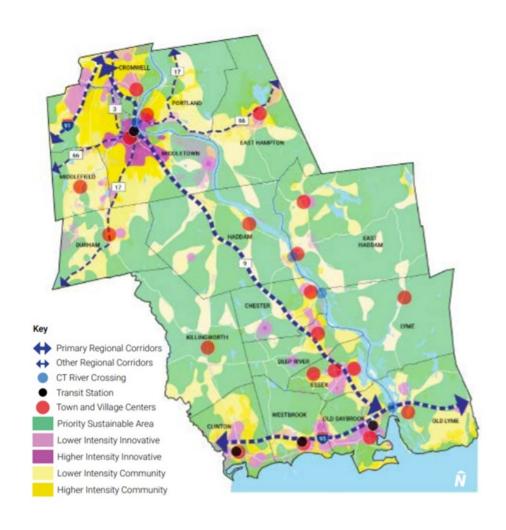




#### **RPOCD FUTURE LAND USE**

#### **RPOCD Future Land Use Map**

- Concept map of future land use in the region
- Sustainable strategy
- Focus growth away from:
  - Wildlife Habitat and Natural Resource Protection Corridors
  - Protected Open Space
  - Watershed Areas and Aquifer Protection Areas
  - Flood Zones
- Focus growth towards
  - Existing developed areas
  - Infrastructure
  - Access to transit



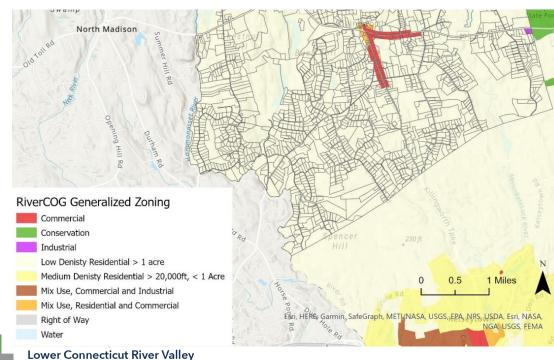


#### **HOUSING OPPORTUNITIES FROM POCD**

- Plan of Conservation and Development Community Developed and Adopted in 2018
- POCD discusses enabling the development of a diversity of housing in Killingworth while respecting existing character and natural environment.
  - "Local land–use regulations must encourage the appropriate development of multifamily, mixed use, mixed income and low to moderate-income housing." (p. 61)
  - "Under Conservation Subdivision and Retirement Subdivision regulations, smaller lot sizes are permitted in exchange for increased dedication of open space." (p. 70)
  - "Flexible zoning techniques can be used to promote a wider range of housing development available to a varied economic population. These include floating zones, planned development districts, and overlay zones." (p. 79)

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- Does not commit to strategies to encourage housing diversity or affordability.
- Existing Strategies in zoning code:
  - Affordable housing subdivision.
  - Accessory apartments and twofamily dwellings.
  - Retirement housing subdivision (Age-restricted housing).
  - Apartments. In 2012, a regulation was adopted to permit Mixed Uses in the Large Commercial District.

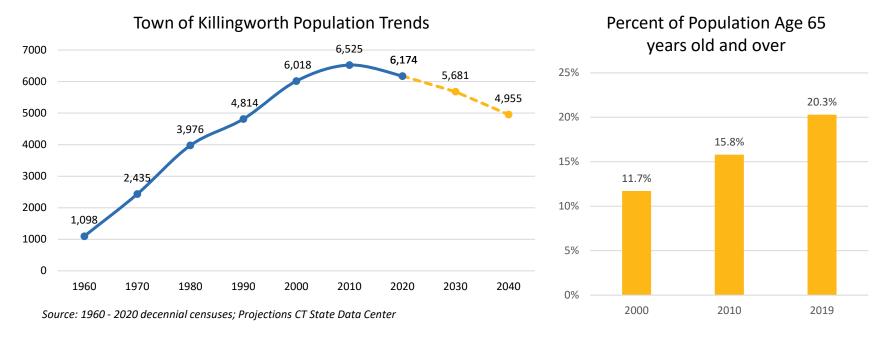




# Existing Conditions: Demographic Trends



#### **POPULATION TRENDS**

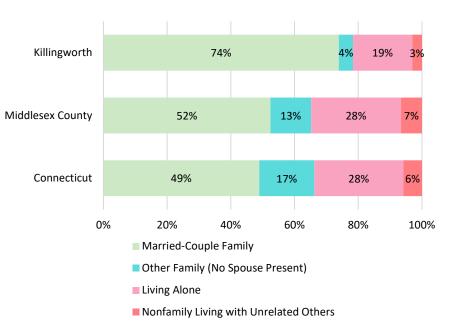


- Killingworth's population peaked in 2010
- After a peak, population decreased by 5.4%
- Share of population 65 years old and over has consistently grown since 2000, reaching 20.3% of the total population in 2019
- Future population drivers will likely be housing turnover
  - Followed by housing construction, including new dwelling units, additions, and expansions

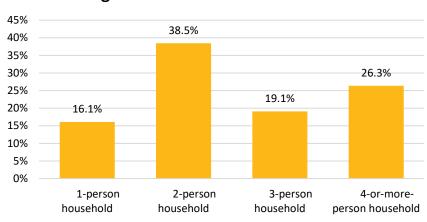


#### **HOUSEHOLD COMPOSITION**

#### **Household Distribution**



#### Killingworth Household Size Distribution



Source: 2019 ACS 5-Year Estimates S2501

 Killingworth has a larger share of married-couple family households compared to state and county

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- Killingworth has a lower number of households living alone compared to the county and state
  - Smaller share of other types of households compared to state and county
- In 2019, 54.6% of Killingworth households are made up of one or two people

#### **HOUSING WAGE**

- The "housing wage" in Killingworth is \$27.87/ hour.
- Each year, the National Low Income Housing Coalition calculates the "housing wage," the hourly wage needed to afford a 2bedroom rental home without paying more than 30% of income on housing.
- According to indeed.com, estimated average salary for an elementary school teacher is \$20.11 per hour in Killingworth, CT – less for entry level.
  - \$18.75 for grocery workers (all positions)
  - \$16.24 for retail sales
  - \$13.15 for waitstaff



#### PEOPLE WHO WORK IN KILLINGWORTH

#### **Major Employers**

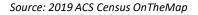
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2018 (CERC)	2021 (AdvanceCT)	
Regional School District 17	Gerard J Frame CPA	
Interstate Battery	Jonathan Island Oyster Co LLC	
La Foresta Restaurant	Interstate Battery	
Killingworth Kids Center	Harkin Engineering LLC	
Killingworth True Value	Boy Scouts of America*	

- The majority of people employed in Killingworth are commuting to reach their jobs - generally from places with more affordable and/or diverse housing
  - Does not include domestic workers (ex. cleaners, nannies) or visiting contract workers (ex. home health aides, visiting nurses)
- 154 people live in Killingworth and work here
- 2,629 Killingworth residents commute to jobs elsewhere

### Where Workers Who Commute to Killingworth Live – Top 10 (ACS 2019)

(* /		
All Workers Who Commute	572	78.8%
Middletown, CT	21	2.9%
East Haven, CT	18	2.5%
Hartford, CT	14	1.9%
Higganum CT	14	1.9%
Deep River Center, CT	12	1.7%
New Haven, CT	10	1.4%
Clinton, CT	8	1.1%
Meriden, CT	8	1.1%
Milford, CT	8	1.1%
Bridgeport, CT	6	0.8%

91 Springfield

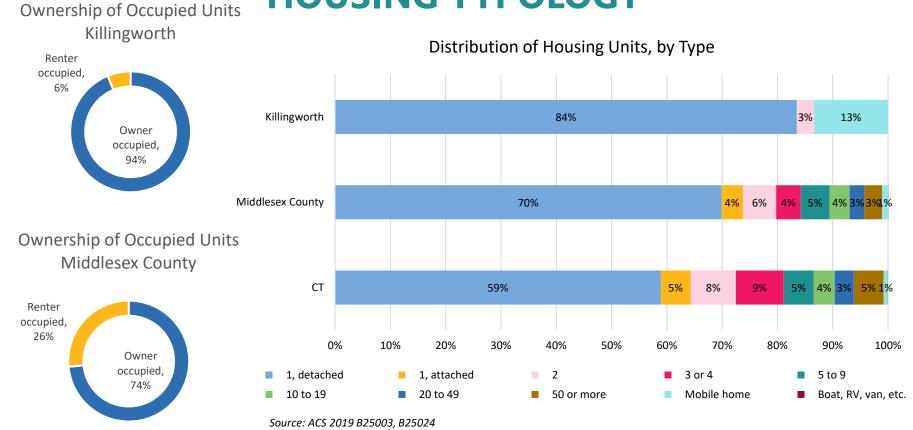




# **EXISTING CONDITIONS: HOUSING MARKET TRENDS**



#### **HOUSING TYPOLOGY**

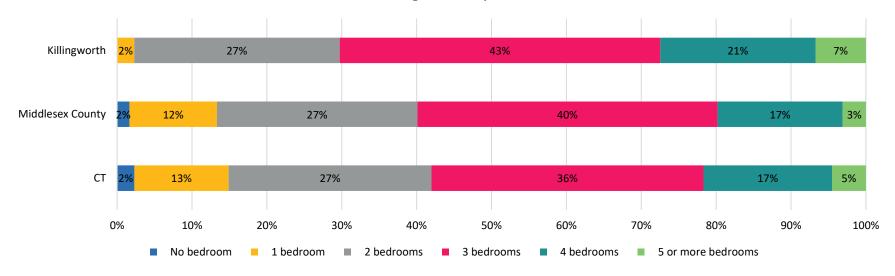


- Only 6% of occupied units in Killingworth are renter-occupied compared to 26% in Middlesex County
- Killingworth has a large share of single-family homes 84%
- 13% of homes in Killingworth are mobile homes
- 70% of housing units in Middlesex County are single-family homes



#### **HOUSING TYPOLOGY**

#### Distribution of Housing Units, by Number of Bedrooms



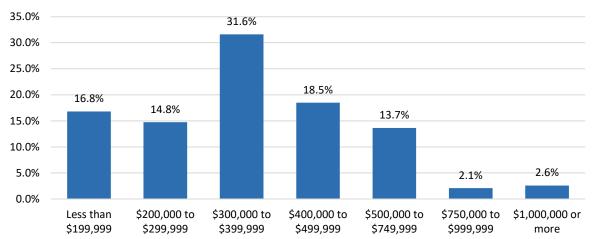
Source: ACS 2019 B25041

- 70% of housing units in Killingworth are 3 or more bedrooms
  - In 2019, 55% of households had two people or fewer
- Size of units largely suited to families with children



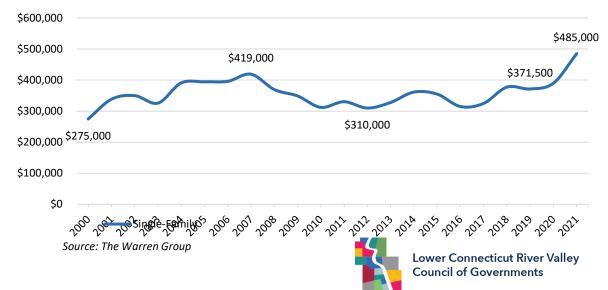
#### **HOME VALUE AND SALE PRICE**





Source: 2019 Amerian Community Survey, 5-Year Estimates, table B25075

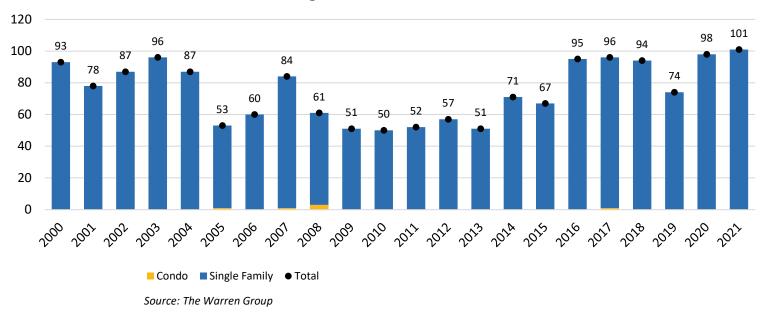
#### Town of Killingworth Median Home Sale Price: 2000 to 2021



- Homogeneous range of values for owneroccupied housing
  - 31.6% of units valued at less than \$300,000
  - 31.6% of units valued between \$300,000 and \$399,999
  - Concentrated in lower end
- Median sale price for single-family homes in Killingworth increased by 5% in 2020 and 24% in 2021 to a historic high.
- Increasing sale prices may encourage more current owners to sell

#### **HOME SALES**

#### Town of Killingworth Home Sales: 2000 to 2021

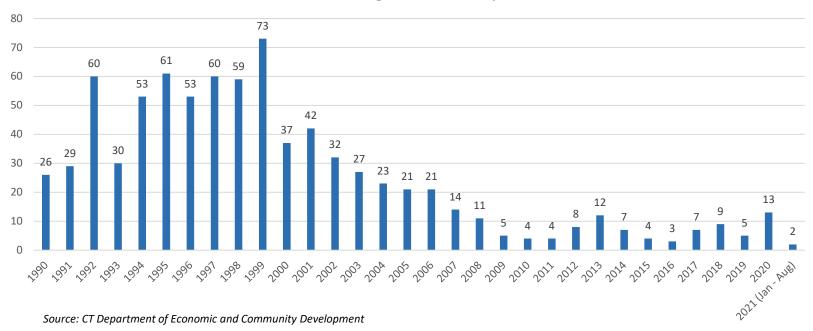


- Nearly exclusive single-family market
- From 2017 to 2021, home sales were generally stable, averaging about 92 per year



#### **HOUSING PERMITS**

#### **Housing Permit Activity**



- Housing permit activity dropped off significantly in the 2000s, indicating lack of available land and economic conditions
- Since 2015, Killingworth has averaged 7 housing permits annually
- Housing permits do not include additions, renovations, nor reinvestment



#### **GROSS RENT DISTRIBUTION**

#### **Distribution of Gross Monthly Rental Costs**



2019 American Community Survey 5-Year Estimates, Table B25063

- Limited number of rental units estimated 143 units as of 2019
- Median gross monthly rent in Killingworth is \$1,161, which is in line with both Middlesex County (\$1,162) and Connecticut (\$1,180)
- About 88% of rental units in Killingworth are less than \$1,499 per month





# HOUSING NEEDS ASSESSMENT



#### **AFFORDABLE HOUSING NEEDS**

#### **How many Killingworth Families Need Affordable Housing?**

#### Low Income 51% to 80% of AMI

<\$59,950 for an individual <\$70,900 for a family of 4



210

Low income HHs



185

Homeowners



**25** 

Renter

#### Very Low Income 31% to 50% of AMI

<\$40,150 for an individual <\$57,300 for a family of 4



195

Very Low income HHs



**185** Homeowners



Renters

#### 30% of less of AMI

<\$24,100 for an individual <\$34,000 for a family of 4



130

Extremely Low income HHs



**65** Homeowners



**65** 

Renters

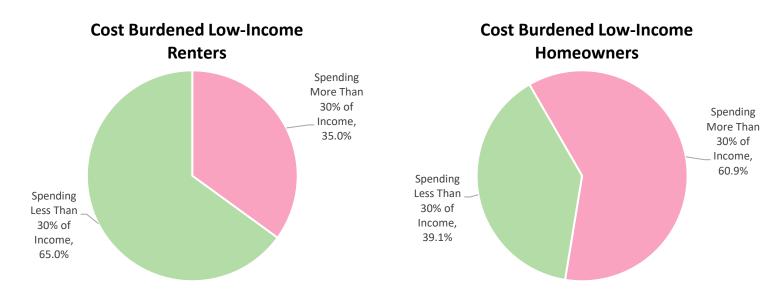
Source: U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Survey (CHAS): 2014-2018

- There are 535 households in Killingworth (23% of total) who meet the definition of low income (household income <80% of AMI)</li>
- Primarily homeowners



#### **COST BURDENS: EXISTING CONDITIONS**

#### Cost Burden for Low Income Households in Killingworth



Source: U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Survey (CHAS): 2014-2018

- **Cost Burden** is defined as households that spend greater than 30% of their income on housing. These households may have difficulty affording necessities such as food, clothing, transportation, and medical care
- In 2018, about 56% of Killingworth's low-income households are cost-burdened
  - Compares to 15% for households who are not considered low-income

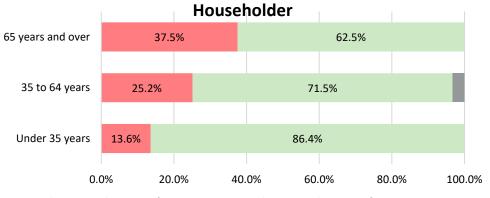


#### **COST BURDENS: EXISTING CONDITIONS**

#### **Cost Burden for Other Populations in Killingworth**

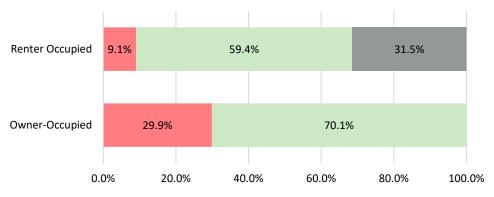
- Senior households are more likely to experience cost burden (37.5%) compared to other households
- Owners are much more likely to be costburdened compared to renters

#### Portion of Income Spent on Housing, by Age of



■ Spending More Than 30% of Income ■ Not Spending More Than 30% of Income ■ Not Computed Source: ACS 5-Year Estimates, Table B25072, 25093

#### Portion of Income Spent on Housing, by Tenure



■ Spending More Than 30% of Income ■ Not Spending More Than 30% of Income ■ Not Computed

Source: ACS 5-Year Estimates, Table B25072, 25093



#### **AFFORDABLE HOUSING: HOMEOWNER NEEDS**

#### **Maximum Home Value Affordable to Low Income Homeowners**

#### Low Income 51% to 80% of AMI

<\$59,950 for an individual <\$70,900 for a family of 4



**\$214,000** for an individual



\$285,000

for a family of 4

#### Very Low Income 31% to 50% of AMI

<\$40,150 for an individual <\$57,300 for a family of 4



**\$143,000** for an individual



\$205,000

for a family of 4

#### 30% of less of AMI

<\$24,100 for an individual <\$34,000 for a family of 4



\$86,000 for an individual



\$121,000

for a family of 4

Source: U.S. Department of Housing and Urban Development (HUD) Income Limits. Based on income limits for the Southern Middlesex County, CT HUD Metro FMR Area Calculation assumes 20% down payment, 30-year mortgage at 5% interest, annual property tax payments, and 1.5% carrying costs for insurance and utilities

**30% Rule:** HUD recommends that households spend no more than 30% of their income on housing costs including rent or mortgage payments, property taxes, utilities, HOA fees, and maintenance costs

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#### **AFFORDABLE HOUSING: RENTER NEEDS**

#### **Maximum** Monthly Costs for Low Income Renters

#### Low Income 51% to 80% of AMI

<\$59,950 for an individual <\$70,900 for a family of 4



\$1,398/month for an individual



\$1,863/month

for a family of 4

#### Very Low Income 31% to 50% of AMI

<\$40,150 for an individual <\$57,300 for a family of 4



\$936/month for an individual



\$1,136/month

for a family of 4

#### Extremely Low Income 30% of less of AMI

<\$24,100 for an individual <\$34,000 for a family of 4



\$562/month

for an individual



\$793/month

for a family of 4

Source: U.S. Department of Housing and Urban Development (HUD) Income Limits. Based on income limits for the Southern Middlesex County, CT HUD Metro FMR Area

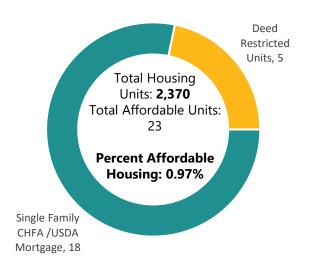
<u>30% Rule:</u> HUD recommends that households spend no more than 30% of their income on housing costs including rent or mortgage payments, property taxes, utilities, HOA fees, and maintenance costs

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#### PROTECTED AFFORDABLE HOUSING

- Protected Affordable Housing Units
  meet the statutory definition of
  affordable housing and are restricted
  to households that make less than
  80% of AMI, so that they spend less
  than 30% of their income on housing
- As of 2020, 23 units, or 0.97% of Killingworth's total housing units were protected affordable units

Affordable Housing Units in Killingworth, by Type: 2020



Source: DECD Affordable Housing Appeals List, 2020



#### **AFFORDABLE HOUSING GAP ANALYSIS**

#### Affordable Housing Supply - Affordable Housing Demand = Housing Gap

- Compares housing demand to housing supply
- Information on low-income household estimates is provided by U.S. Dept. of Housing & Urban Development (HUD), Comprehensive Housing Affordability Survey (CHAS)
- Information on naturally occurring affordable housing uses 2019 American Community Survey 5-Year Estimates – Home Value Distribution and Gross Rent Distribution
- HUD recommends reviewing a family of four and single-person households

#### Killingworth's Affordable Housing Gap Analysis identified the following:

- For Family of 4 Households Housing Unit Gap (40 needed units) was identified for any
  of the 3 low-income groups for units to buy or rent
- For Single-Person Households Housing Unit Gap (197 needed units) was identified for Very Low Income & Extremely Low-Income Households to buy
- More detail is available in the Data Analysis for Killingworth AHP



## CASE STUDIES AND POTENTIAL STRATEGIES



#### **AUDIENCE POLLING INTRO**

We are going to use interactive polling during this workshop.

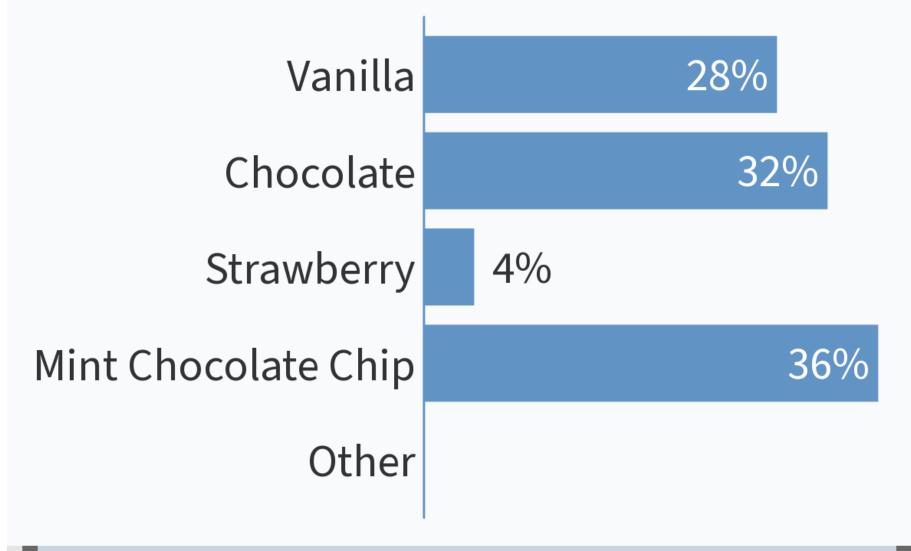
You will need access to an additional webpage.

Let's get started!

#### Go to PollEv.com/SLR2021



#### What is your favorite flavor of ice cream?



#### **POTENTIAL STRATEGIES**

These are not all the potential strategies being considered. But we want to hear from you!

- Leverage municipal property
- Reconsider Soil-Based Zoning
- Reconsider Open Space Subdivision Requirements
- Consider Creating a Housing Committee/ Department



#### LEVERAGE MUNICIPAL PROPERTY

#### **Case Study: Town of Guilford**

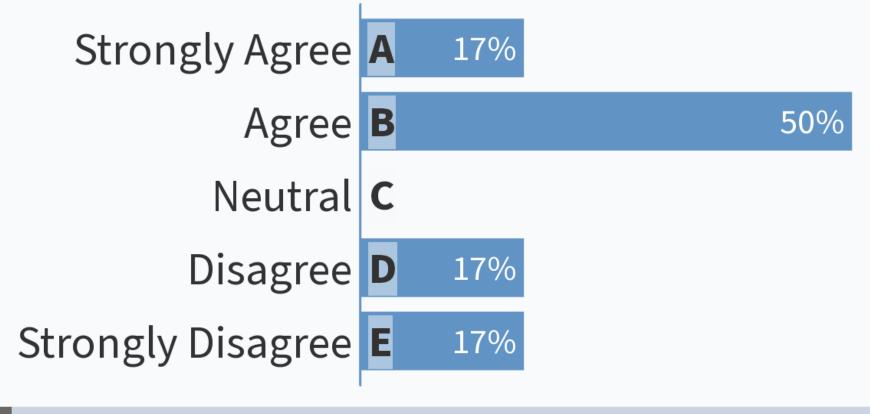
- Woodruff Property (formerly Townowned) located near the green.
- Town obtained a state grant for site feasibility study to determine appropriate size and scale of development.
- At a Town Meeting, residents voted overwhelmingly in favor of conveying the land to a non-profit affordable housing developer.



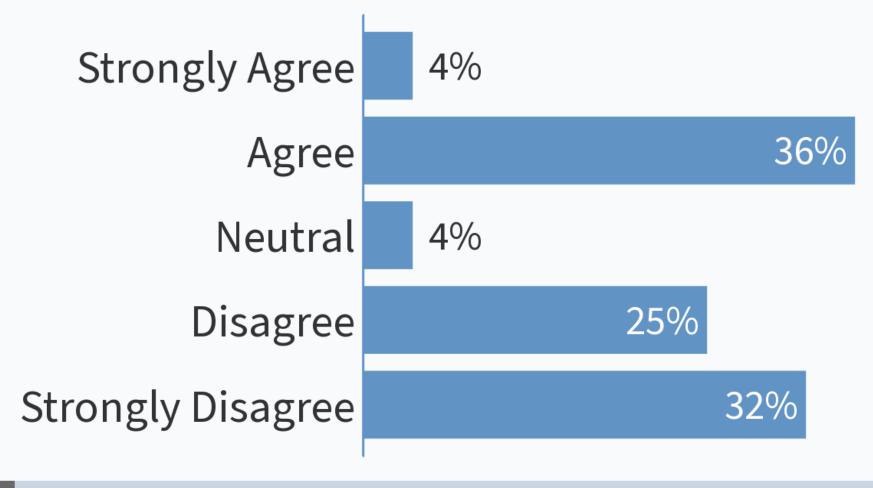




# Killingworth should study the suitability of underused Town properties for housing development



## Killingworth should acquire additional suitable property for housing development



#### **SOIL-BASED ZONING**

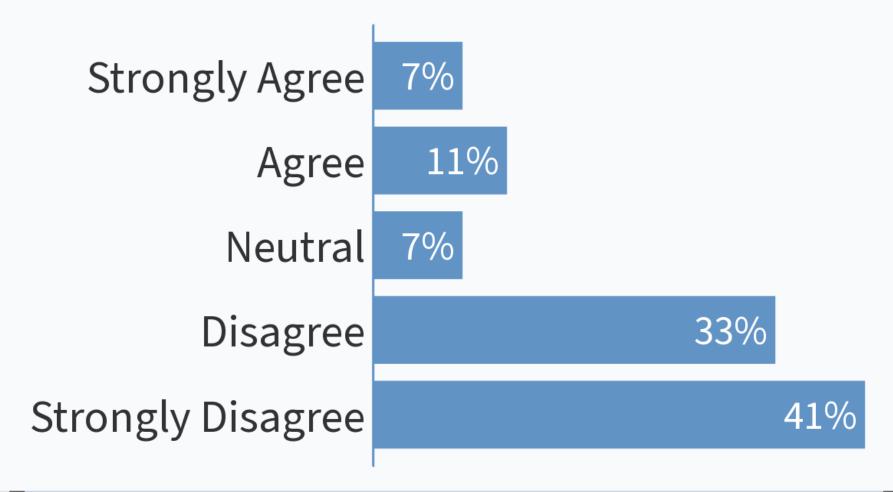
#### Did you know?

- Killingworth has soil-based zoning. Minimum lot size and/or number of residences depend on the soil type and amount of each soil type on the property.
- The State and Killingworth's own ordinances state that the Local Department of Public Health is responsible for determining if soils are appropriate for septic and the number of dwellings and bedrooms it can sustain.
  - Conducts soil tests, plan reviews for additions on properties, new septic system and repair septic system reviews, field inspections.
- Soil-based zoning is duplicative and potentially inaccurate as conditions change

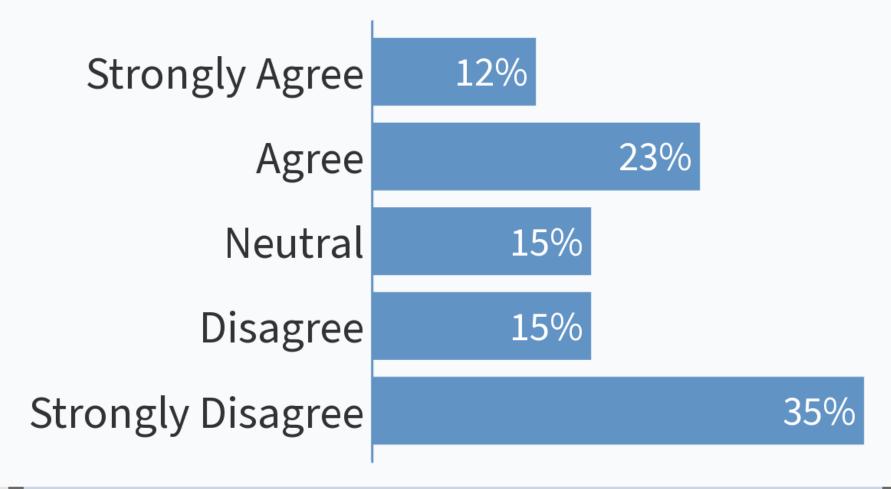




## Killingworth should eliminate soil-based zoning throughout town



## Killingworth should eliminate soil-based zoning in certain areas or for certain uses

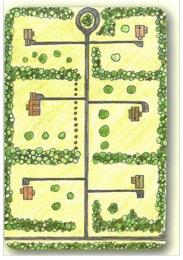


#### **CONSERVATION SUBDIVISION**

Conservation subdivisions, also known as an openspace subdivision or cluster development, allow for more intensive development a portion of a lot, while preserving the remaining area of the lot as open space.

Layouts reduce development costs by allowing development on smaller lots, by cutting road and utility costs, and by allowing the developer to bypass natural obstacles in the site.

In order to meet the statutory definition of affordable housing, conservation subdivisions would need to contain a share of units to be affordable.



Traditional Subdivision



Cluster Subdivision



#### CONSERVATION SUBDIVISIONS IN KILLINGWORTH

#### Very restrictive requirements:

- The parcel of land shall contain a minimum area of 20 contiguous acres, of which at least 15 acres shall belong to Soil Class A, B or C
- Maximum number of lots that would be permitted using a minimum
   buildable lot area of 2 acres shall be submitted (Ex. 20 acres → 10 units)
- The total number of all units in the subdivision shall not exceed the number of acres comprising the subdivision divided by 3 (Ex. 10 acres → 3 units)
- No more than 12 lots may be placed on a private road
- The parcel shall have not less than 50 feet of contiguous frontage on a public street
- The minimum lot rectangle shall be 150 feet by 150 feet



#### **CONSERVATION SUBDIVISION EXAMPLE**

#### **Case Study: Town of Guilford**

**Great Hill Cottage Community** 

- 10 deed-restricted, 1,400 1,700-square-foot cottage homes
- 2 to 3 bedrooms, 1.5 stories
- 12-acre lot, 1 mile from town center
- Designed to meet US Dept. of Energy's "Net Zero Energy Ready" program





#### **CONSERVATION SUBDIVISION EXAMPLE**

#### **Case Study: Borough of Newtown**

**Enclave at Taunton Lake** 

- 29-acre site with 29 individual buildings
- ~70% of the site will remain undeveloped ~450ft of frontage on Taunton Lake, that land will be preserved

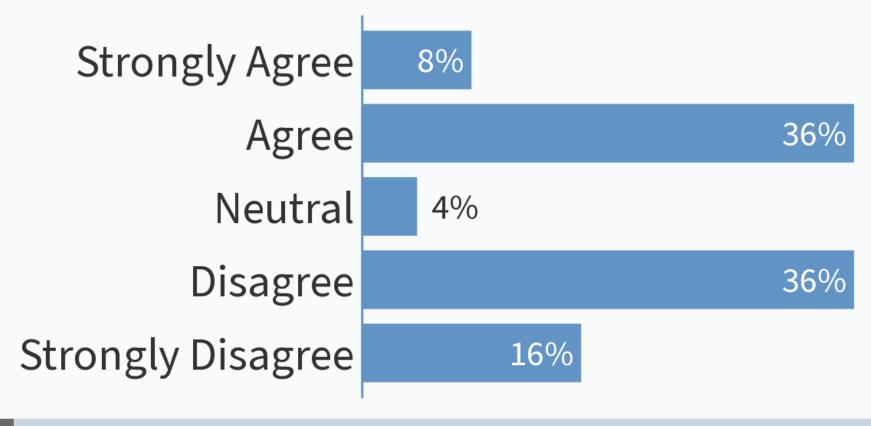




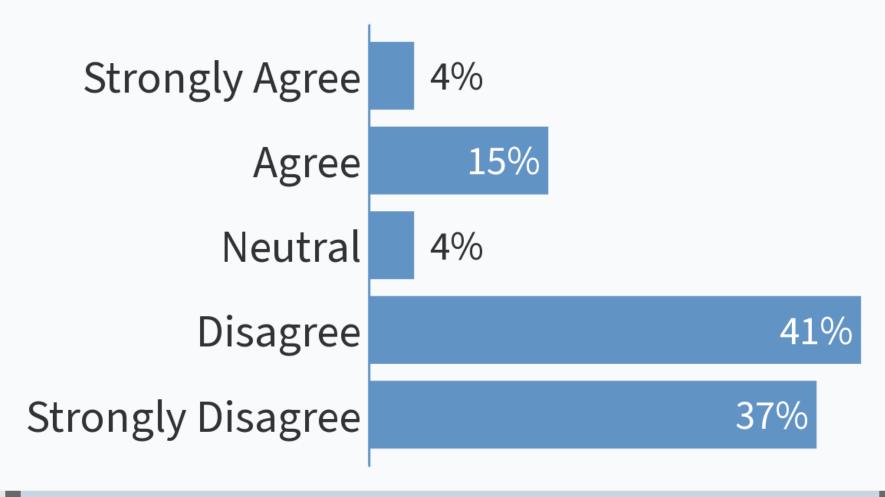




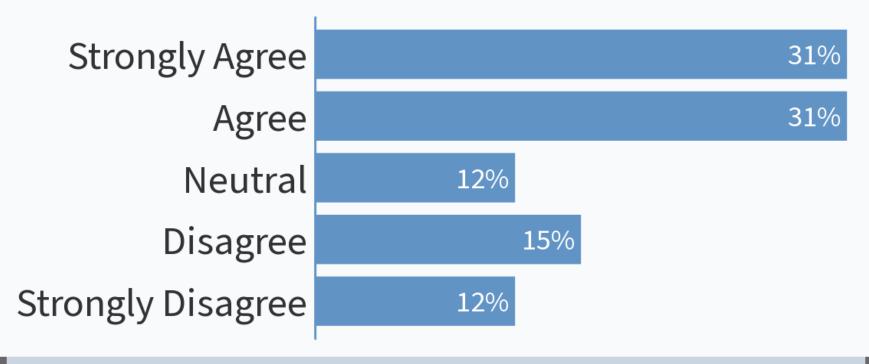
# Killingworth should increase or eliminate the cap on units on a private road for new conservation subdivisions



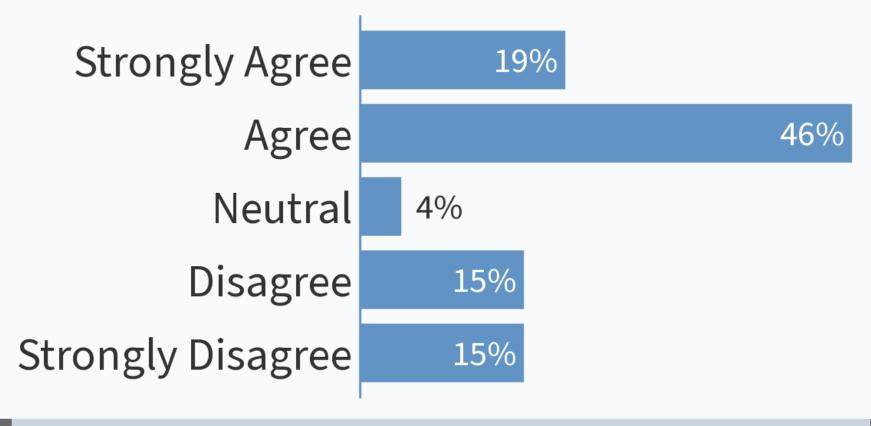
## Killingworth should eliminate soil-based zoning for new conservation subdivisions



# Killingworth should require that a certain percentage of new conservation subdivision units should be set aside as affordable housing



# Killingworth should consider allowing non-buildable land to count toward minimum acreage

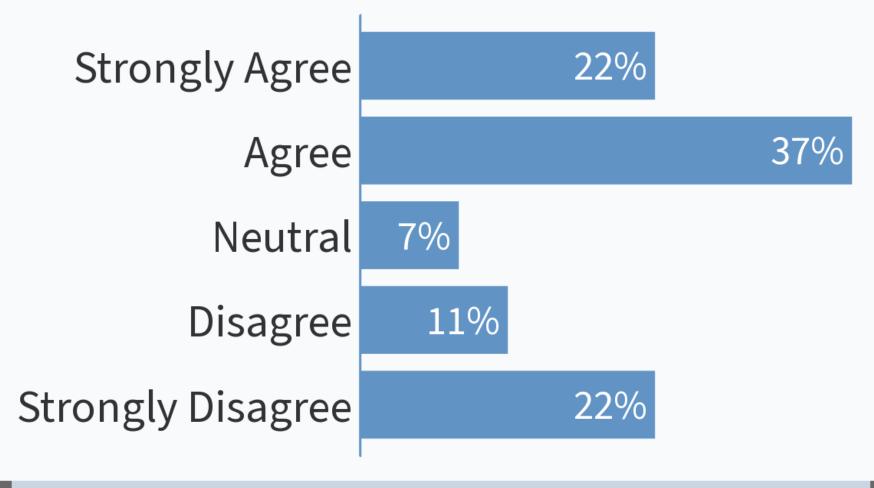


#### **AFFORDABLE HOUSING COMMITTEE**

- Killingworth has an all-volunteer Committee on Alternative Housing.
   Charged to:
  - Design and implement a housing needs assessment, including community desires, affordability, sustainability, and consistence with the Killingworth Plan of Conservation and Development.
  - Analyze the data and describe the implications for Killingworth.
  - Propose a program to attract and generate affordable and environmentally sustainable housing to accommodate residents of all ages, with consideration of maintenance as well as financial limits of the served population taken into account.
- A formal Affordable Housing Committee could:
  - Have Town staff
  - Facilitate and manage public private partnerships
  - Coordinate the development of more affordable/ attainable/ diverse housing that aligns with Town priorities



## Killingworth should have a formal Affordable Housing Committee



## Rank the following strategies from most to least appropriate for Killingworth



#### **QUESTIONS AND ANSWERS**

If you have any questions or comments, please type them in the chat.

Are there any strategies you would like to see your town pursue that we didn't mention?

Is there anything you would like more information on or that you feel we should have covered or covered in more detail?

How do you feel about the current state of housing in your community?

Did anything you heard today change your opinion?



#### **NEXT STEPS**

- Based on input from this workshop, we will continue to develop the strategies
- Prepare Town 8-30j plan March/April
- Draft will be available for public review in mid-spring
- Finalize 8-30j plan
- Adoption of plan & submission to state by June 1, 2022



#### Thank You!

