

December 6, 2021

Letter for the Public Hearing on December 8, 2021

Dear Affordable Housing Committee:

Thank you for your work putting together this detailed plan. My main concern is that it contains a lot of statistics about why affordable housing is important but it doesn't really talk in great detail about what is happening in Cornwall now, and what Cornwall residents need. For example, many people, including Nancy Berry, have spoken about the need for more affordable accessory dwellings. But then there is nothing in the plan that ensures that those dwellings remain affordable.

I think it's now time to do the work making this plan more closely reflect Cornwall's needs and aspirations by gathering data and information locally. And it's imperative to allow enough time (several months) to incorporate public feedback rather than rushing this process. Because, while the Committee did meet over several months:

- 1) The Committee would not allow drafts of the plan to be made available to the public, and;
- 2) The Public was only allowed to comment briefly at the end of each meeting,

making it virtually impossible for the public to contribute in any meaningful way to the discussion.

Finally, some of the plan's suggestions have the potential for some serious unintended consequences. The plan needs to be carefully evaluated with that in mind, not only because we want to protect Cornwall's rural and natural environment, but also because we don't want to give affordable housing a bad "rap" so to speak, i.e. one problematic project could ruin it for all others. I also believe it's very important that the people who most benefit from these projects are the people who truly would benefit from new housing opportunities, and not the private developers.

And here are a few questions/concerns:

- **Adoption of the Plan in December 2021!** Why? Plan is not due until July 2022! With more time, the Committee could incorporate feedback from the public into the plan, and gather more local information.
- Pdf p 18 **Why tell the P+Z what to do? Ie to amend the zoning regulations.** Especially as the Chair of the P+Z Anna Timell is on the Affordable Housing Committee. This Affordable Housing Committee should be **an independent body and should be making recommendations of no kind to the P+Z of which Anna Timell is Chair.** The disclaimer that these are only suggestions is not adequate, because this plan will be used as a justification for zoning changes just as the Plan of Conservation and Development is used.

- Questionable Statement: The Plan says that it is not recommending that Cornwall opt-out of the “as of right” Accessory Dwelling state requirement saying that **this is in line with Cornwall’s Plan of Conservation and Development. But there’s nothing in Cornwall’s POCD that says anything of the kind!** There is a possibility to opt-out of this “as of right” requirement but it has to be done in a timely fashion. **So why are we not opting-out of the state requirement that accessory apartments be built without any public input or even a zoning permit? Why not let Cornwall residents decide whether that’s right for Cornwall?** Especially as the plan says that these dwellings can be HUMONGOUS...literally! I.e. why, for heaven’s sake, are we going beyond the state requirement of 1000 sq feet (or Cornwall’s current 1200 sq foot #) to allow these Dwellings to be ANY SIZE? I don’t think anyone considers a 6,000 sq foot accessory dwelling to be “accessory” or “affordable.” And as Purnell and David Colbert both point out in their letters, it can open up a lot of cans of worms that actually work against these dwellings being affordable at all! (See Purnell’s note about how accessory dwellings are being used as Airbnb rentals and making big bucks for people...and not at all affordable.)
- Why open up all multi-family housing to private developers? What’s the reasoning for this? Perhaps it should be limited to certain sized buildings? Or houses with a limited number of apartments? This is a big change. Shouldn’t this be described and delineated in more detail or brought before the public first for their opinion? Also, could accessory apartments be considered multi-family and thus allow a private developer to build them “as of right”? (I have no idea; would be useful to know.)
- Allowing houses to be converted to apartments regardless of their age. It seems like a bit of a radical shift to go from a 15-year requirement on the age of a house to ZERO. Couldn’t this have some unintended consequences? Is the owner-occupancy requirement being removed as well? Can private developers do this? Or Air BNB aficionados?
- The Board of Selectmen administering a Housing Fund. What is the reasoning for this i.e. not having this administered by the Housing Corporation? And then having another Housing Authority? It is unclear why a new Housing Authority is needed. What advantages are there to having two housing authorities (ie CHC and this new one) in town and in addition to that, a Housing Fund? Shouldn’t the Fund be managed by a separate entity as the Board of Selectmen currently has quite a lot on its plate?
- Partnership for Strong Communities Data: The report relies substantially on data from the Partnership for Strong Communities which used American Community Survey Data from 2014-2018. But one of the members of your committee, Anna Timell, pointed out the inaccuracy of this data especially as it pertains to small towns in a report she wrote entitled, “Cornwall By the Numbers.” She writes: **“Their data is always plagued by a small sample**

size and a wide margin of error, which is especially important in small towns. For example, the most recent American Community Survey (ACS) from 2017 gives Cornwall a population of 1364.” In that same report, Timell cited David Grossman’s great work as a demographer in Cornwall previously. Why not hire a demographer to do such work for this plan? In addition, several pieces of important data from the 2020 Census will be available in the spring of 2022. This plan is due in July 2022, which would give plenty of time to incorporate 2020 data in this Affordable Housing Plan.

- P6. Discussion of 8-30g...ie the 10% affordable housing requirement. It would be useful to include **the moratorium process** that can be implemented by towns to exclude them from the 10% requirement if they can show they are making progress towards more units. Because as the plan states, the 10% requirement is **100 affordable housing units in Cornwall!** And now that the Plan is proposing that private developers be allowed to build affordable housing in Cornwall, we could be opening up another can of worms. Also, I did not hear any discussion of this moratorium process at any of the Affordable Housing Meetings, so it would be great to address.
- Marguerite Purnell’s letter raises excellent questions re: the current availability of affordable housing in Cornwall, and the section on Cornwall Housing Corporation on p. 7. I agree that more information could be invaluable especially as the CHC has done such great work to date. As Purnell notes, it would be great to have more information on the specifics of what is available in Cornwall, and whether or not it’s considered affordable housing by the state. I think a lot more details and data could help to define the need in Cornwall, because just saying 18 people or 10 people are on a waiting list doesn’t actually give much information. And in a way, those numbers kind of seem low because often people will put themselves on a wait list and then find housing somewhere else. And from what I understand, anyone can join those wait lists from anywhere. So do these numbers actually reflect the number of people who currently live in Cornwall who are seeking affordable housing? And what do THOSE people need?
- P4. The statement that the “public had access to all project related documents” **is simply not true** as the Committee **would not provide drafts** of the plan to the public, even after members of the public requested it.
- p. 7: “Clearly, the demand for more affordable housing options exists.” This conclusion seems faulty based on the data contained in that paragraph. It would be useful to support this statement with more specifics. Again, these wide-ranging generalizations do not help the cause here because it can lead to people feeling “duped” and can take away from the validity of the issue.

- p. 8: “The overall trend suggests fewer and fewer children over time.” As Purnell points out, this trend needs to be presented in line with general demographic trends instead of as if Cornwall is unique in this regard. Also, I think it is really hard to predict what the results of the pandemic will be with regards to younger families etc in Cornwall and the plan should avoid making assumptions/conclusions in that regard. Finally, to equate the lack of school-aged children with the lack of affordable housing does not take into account how availability of employment plays into this statistic. Also, in terms of the population aging, CT State Data also indicates that residents in their 40’s will increase which the plan seems to overlook. So the data seems generally kind of spotty, which is one more argument against relying so heavily on data taken from outside sources rather than examining what is actually happening in Cornwall.
- p. 9 pdf. **Cornwall’s Current Housing Situation:** I think it needs to be made clearer that this data is not current but is from the 2014-2018 American Community Survey Data which Timell points out can be quite inaccurate for small towns such as ours as it’s estimated data and projections. I think it’s really important that we get actual numbers for Cornwall, not projections.
- P10. How can the plan predict that school age children won’t stick around, but then say that home prices are so high due to Covid, and will probably remain so? It can’t be both. The section about why young people are leaving rural areas also doesn’t take into account the lack of jobs in the area.

I believe in affordable housing. I also believe in doing what’s right for Cornwall and not what’s right based on data that’s culled from various time periods and outside sources.

Let’s talk about what’s right for Cornwall. Let’s hear about the needs of people living here. And let’s craft a true Cornwall plan based on those needs.

Thank you.

Sincerely,

Caroline Nastro