

# Affordable Housing Plan

## Town of Montville

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Prepared by Southeastern Connecticut Council of Governments Staff for the Montville Planning & Zoning Commission

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# Introduction

## What is Affordable Housing?

Generally, housing is considered *affordable* housing if its occupants are low- and moderate-income households who pay no more than 30% of their income toward housing costs, including mortgage, rent, property tax, and utilities. While some housing may be “naturally” affordable, in that the housing is currently renting or selling at a relatively low price, it may be occupied by higher-income households or be un-affordable to its existing occupants. “Qualified” affordable housing created or maintained under government subsidies or programs is usually intended for occupancy by households earning no more than 80% of median income, and typically has a 40-year deed restriction in order to keep the housing affordable. The section on “Affordable Housing Appeals Act (8-30g)” has more information on what is considered qualified affordable housing in Connecticut.

The U.S. Department of Housing and Urban Development (HUD)’s information for the Norwich-New London area defines a family of four earning up to \$79,900 per year as low-income under HUD’s 80% Area Median Income calculations. For this family of four, an affordable home could cost up to \$1,998 per month for rent and utilities; or mortgage, property tax, and utilities; and a single person with an income of \$55,950 a year could afford up to \$1,399 a month in housing costs. 2020 ACS Census data estimates that the median household income in Montville is slightly lower than the Area Median Income, at \$80,765. Montville has a total of 382 total assisted units (5% of housing stock), of which 81 are government assisted, 54 have tenant rental assistance, 247 have CHFA or USDA mortgages, and none are deed restricted.

HUD Metro Area	Median Family Income	FY 2021 Income Limit Category	Persons in Family			
			1	2	3	4
Norwich-New London Metro	\$88,600	Low Income (80%)	\$55,950	\$63,950	\$71,950	\$79,900
		<i>Affordable Monthly Housing Budget</i>	\$1,399	\$1,599	\$1,799	\$1,998
		Very Low Income (50%)	\$36,050	\$41,200	\$46,350	\$51,450
		<i>Affordable Monthly Housing Budget</i>	\$901	\$1,030	\$1,159	\$1,286
		Extremely Low Income (30%)	\$21,600	\$24,700	\$27,800	\$30,850
		<i>Affordable Monthly Housing Budget</i>	\$540	\$618	\$695	\$771

Figure 1. Area Median Income in the Norwich-New London Metro Area and Affordable Housing Income Limits.  
Source: HUD Income Limits Summary, 2021.

## Why Plan For Affordable Housing?

Connecticut laws grant municipalities the authority to regulate land use development through local zoning regulations, which establish rules for the location and type of housing that can be constructed in Connecticut (Title 8 of the Connecticut General Statutes). These laws specify the conditions under which municipalities may adopt local land use plans and regulations.

CGS § 8-2 outlines the authorities municipalities are granted to adopt local zoning regulations, while CGS § 8-23 establishes a requirement for municipalities to adopt local Plans of Conservation and Development, which document policies and goals for the physical and economic development of a municipality. Both § 8-2 (zoning) and § 8-23 (planning) direct municipalities to consider the need for affordable housing, both locally and at the regional level, and to adopt zoning that encourages the development of multifamily dwellings and housing at different price points.

CGS § 8-30j, added in 2017, establishes an additional obligation for municipalities to adopt Affordable Housing Plans that will specify how the municipality will increase the number of local “affordable housing developments.” In 2020, the Connecticut Department of Housing worked with the Regional Plan Association to develop guidance on how municipalities might approach the development of Affordable Housing Plans ([https://portal.ct.gov/-/media/DOH/AHPP-Guidebook\\_RPA\\_120120.pdf](https://portal.ct.gov/-/media/DOH/AHPP-Guidebook_RPA_120120.pdf)), and provided small grants to support municipal work to prepare plans. Municipalities must adopt their initial Affordable Housing Plan by June 1, 2022 and amend it at least every five years thereafter.

*§ 8-30j(a): “At least once every five years, each municipality shall prepare or amend and adopt an affordable housing plan for the municipality. Such plan shall specify how the municipality intends to increase the number of affordable housing developments in the municipality.”*

The § 8-30j requirement for Affordable Housing Plans was added by the state legislature in recognition of increasing challenges for Connecticut residents in finding adequate affordable housing. In the last twenty years, the share of Connecticut renters who pay more than 30% of their income towards housing rose from 37% (in 2000) to 46% (in 2019). Homeowners with mortgages also saw their budgets stretched, with 20% of homeowners housing cost-burdened in 2000 and 31% in 2019. In Southeastern Connecticut, one in four households earns less than 80% of the area median income and is housing cost-burdened, paying more than 30% of their income towards housing costs.

Since 2020, the region and the nation have seen skyrocketing housing costs in the wake of the COVID-19 pandemic, in part due to material and labor shortages in the production of new housing and fierce competition over the limited supply of apartments for rent or homes for sale. The beginning of 2022 has also seen rising inflation and higher gas prices, putting further strain on household budgets. In 2021, the legislature passed Public Act 21-29, “An Act Concerning The Zoning Enabling Act, Accessory Apartments, Training For Certain Land Use Officials, Municipal Affordable Housing Plans And A Commission On Connecticut’s Development And Future.” Several portions of this new public act will require changes to Montville’s existing zoning code, and relevant recommendations have been incorporated into the Action Plan.

The Affordable Housing Plan is an opportunity for municipalities to more closely examine housing needs and review how existing housing inventories and land use policies do or do not address those needs. It

asks municipalities to outline how they intend to increase the supply of affordable housing, so the planning process also prompts a review of potential actions that municipalities may take that would enable or promote the development of housing that is affordable and accessible to lower-income residents. The 8-30j Affordable Housing Plan statute references the definition of *affordable housing developments* included in CGS § 8-30g, which defines them as *assisted housing* that receives government subsidies to provide affordable housing for low and moderate households, or a *set-aside development* where deed restrictions ensure that at least 30% of the housing units are occupied by low-income households at affordable rates for at least 40 years. This definition of housing would include any deed-restricted affordable housing created as part of a mixed-income development, as well as affordable housing built or preserved with the support of state or federal programs.

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# Housing Conditions in Montville and Southeastern Connecticut

## Affordability

A 2018 review of housing conditions in southeastern Connecticut prepared by the Southeastern Connecticut Council of Governments (SCCOG), in partnership with the Southeastern Connecticut Housing Alliance, showed that demand is most acute in southeastern Connecticut for lower-cost housing and rental housing. The portion of southeastern Connecticut households that can afford the housing they live in has dramatically decreased in the last twenty years. Since 2000, the share of renters who cannot afford their housing, and are therefore housing-cost-burdened, increased from 31% to 46%. As previously mentioned, as of 2018 there were 29,000 housing cost-burdened households in southeastern Connecticut earning less than 80% of the area's median income, one in four households.

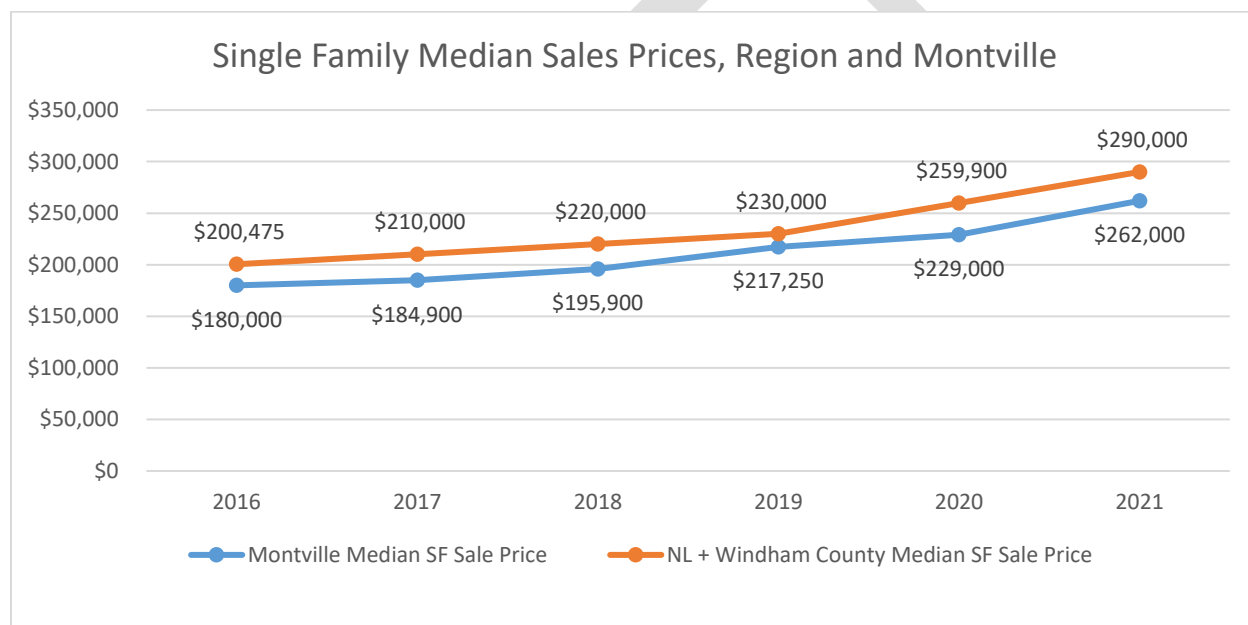


Figure 2. Single Family Median Sales Prices: Region and Montville. Source: Eastern Connecticut Association of Realtors(R) Market Statistics.

The rise in housing challenges is linked to a growing mismatch between incomes and housing costs. Adjusted for inflation, income growth in the region has been stagnant, growing less than 1% between 2000 and 2019, while for-sale housing prices and rents have increased 23% and 19%, respectively. In the New London/Windham County Eastern Connecticut region, median single-family sale prices rose from \$230,000 in 2019 to \$259,900 in 2020, and increased further in 2021 to \$290,000, a \$60,000 increase in two years. Montville has been mirroring this trend. Although median sales prices in Montville are lower than in the region as a whole, Montville has likewise seen a 21% increase in prices from 2019 to 2021.

As reported in 2020 ACS Census data, Montville had 7,402 housing units, with 18,387 people in 6,728 households, of which approximately 82% are owner-occupied. Census data for Montville includes 1,414 people living in group quarters, including 1,137 people in institutional facilities for adults, 11 in juvenile facilities, 108 in nursing facilities, and 158 in other noninstitutional facilities. The median sale price of a

single-family home in Montville was \$262,000 in 2021, about \$28,000 under the median value for homes sold in New London and Windham County that year. Median household income is approximately \$80,765, and median gross rent in Montville is \$1,110.

## Local and Regional Housing Market

Housing in southeastern Connecticut's suburban and rural municipalities is more likely to be in larger single-family homes, while one-bedroom units are concentrated in the region's urban centers. Many of the region's suburban and rural communities have few alternatives to the single-family home, with single-family housing making up over 90% of housing in some communities. Homeownership is also more common in rural/suburban towns, with urban households slightly more likely to rent (54%) than own, and suburban/rural households much more likely to own their homes (80.1%). In Montville, about 80% of homes are in single-family houses, with the remainder in mobile homes and multifamily properties. Three-bedroom homes are the most common home size in Montville, at 43% of all inventory.

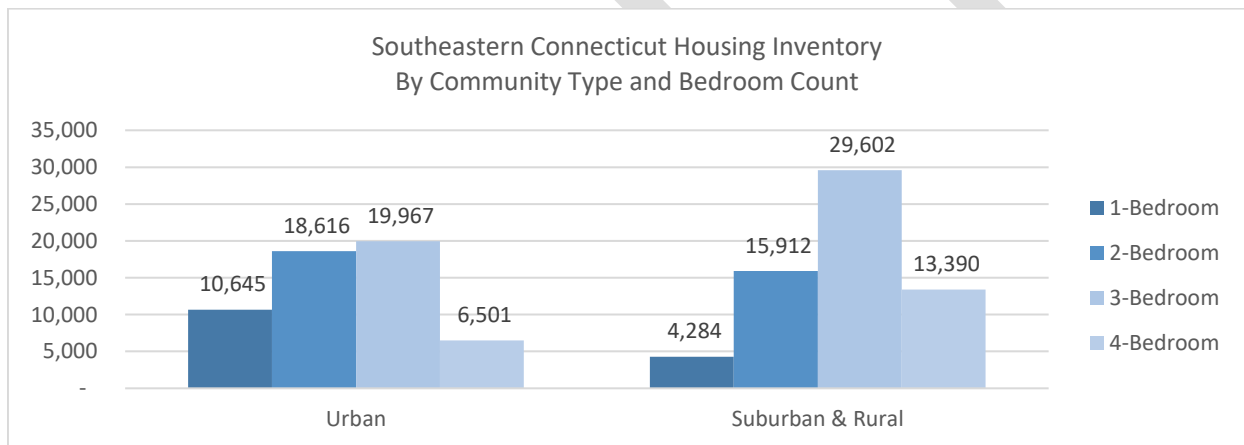


Figure 3. Housing in Southeastern Connecticut: Units by Number of Bedroom and Urban or Suburban/Rural Community Type. Additional 0-bedroom and 5+ bedroom units not shown. Source: U.S. Census American Community Survey (ACS) 2018 5-Year Estimates.

Housing construction in southeastern Connecticut has remained sluggish since the 2008 recession began, with annual production hovering around 300 units per year. Housing construction has traditionally focused on the production of single-family homes in suburban and rural municipalities. Building permit data reported to the Connecticut Department of Economic and Community Development (DECD) show a spike in 1992, another period of high activity from 2000 to 2005, and then very low housing activity from 2011 to 2020.

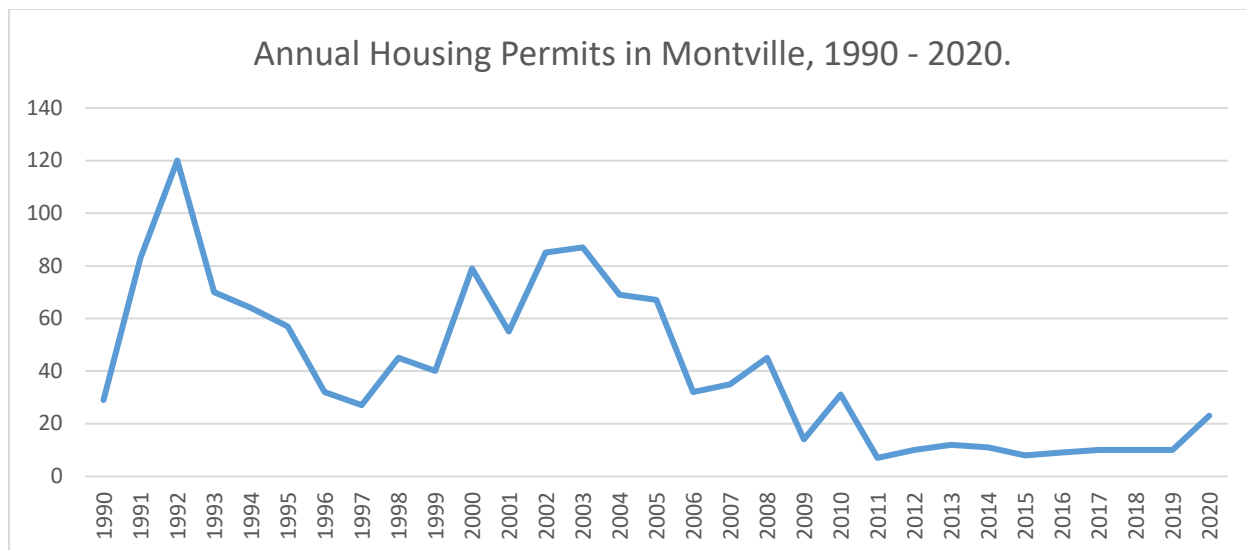


Figure 4. Housing Permit Activity in Montville, 1990 - 2020. Source: CT Department of Economic and Community Development.

## The Impact of Changing Demographics on Housing Demand

Montville, like many communities in Connecticut, is aging. According to the 2020 Census, the average age of residents in Town was 43.1, about 2 years older than the region as a whole. From 2010 to 2020, the population decreased by 6%, a decline of 1,184 residents. This decline was seen in both the adult and child population, with 506 fewer adults in 2020 (-3%) and 678 fewer children (-17%).

SCCOG's 2018 projections of future housing needs estimate that based on the expected demographics of future southeastern Connecticut households, demand will continue to increase for lower-cost and multifamily housing. Of the approximately 7,000 additional households expected by 2030, more than half are expected to be low-income, partially due to growth in the number of senior citizens, as baby boomers continue to age into retirement, as well as young workers who typically earn lower wages. New housing production of a little more than 500 units per year would satisfy expected new need for housing, but not address existing unmet needs. Demographic shifts, especially a continued decline in household sizes, explain how a stagnant or shrinking population can still need additional housing.

In Montville, the majority of households are one or two people (20% and 41%, respectively), yet only 30% of units in Montville have only one or two bedrooms. About half of people living alone in Montville are over the age of 65. Many retirees and empty-nesters may be living in larger, older homes that will become increasingly hard to take care of as they age. Potential issues that they face can include a need for assistance with maintenance and repairs while living on a fixed income, or a need to eventually downsize into a more manageable home or apartment or assisted living facility.

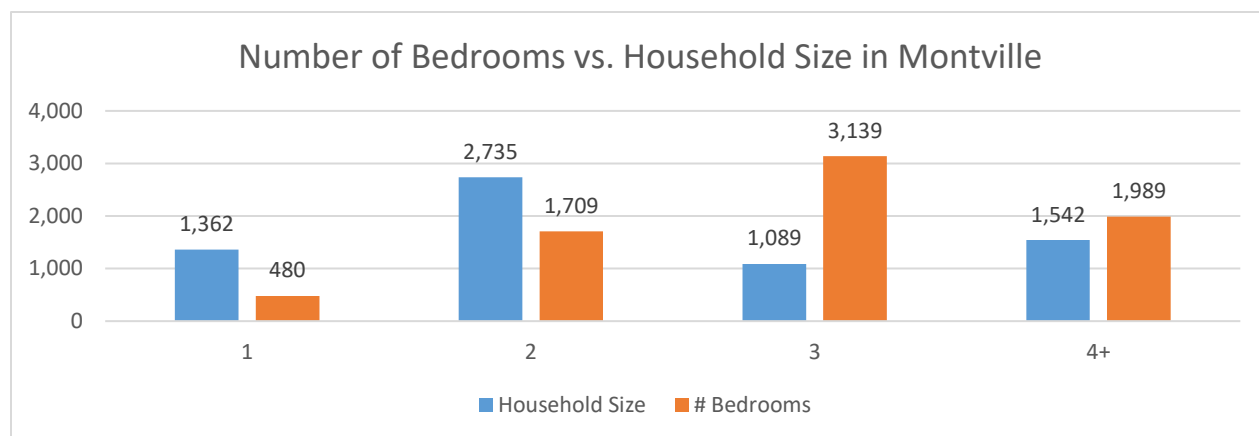


Figure 5. Residents per Household and Bedrooms per Housing in Montville. Source: US Census 2020 5-year American Community Survey.

According to enrollment data from EdSight, the data portal for the Connecticut State Department of Education, enrollment at Montville public schools has declined 30% since 2007, from 2,866 in 2007 to 1,999 in 2021. This may indicate that the existing schools would have capacity for any additional students.

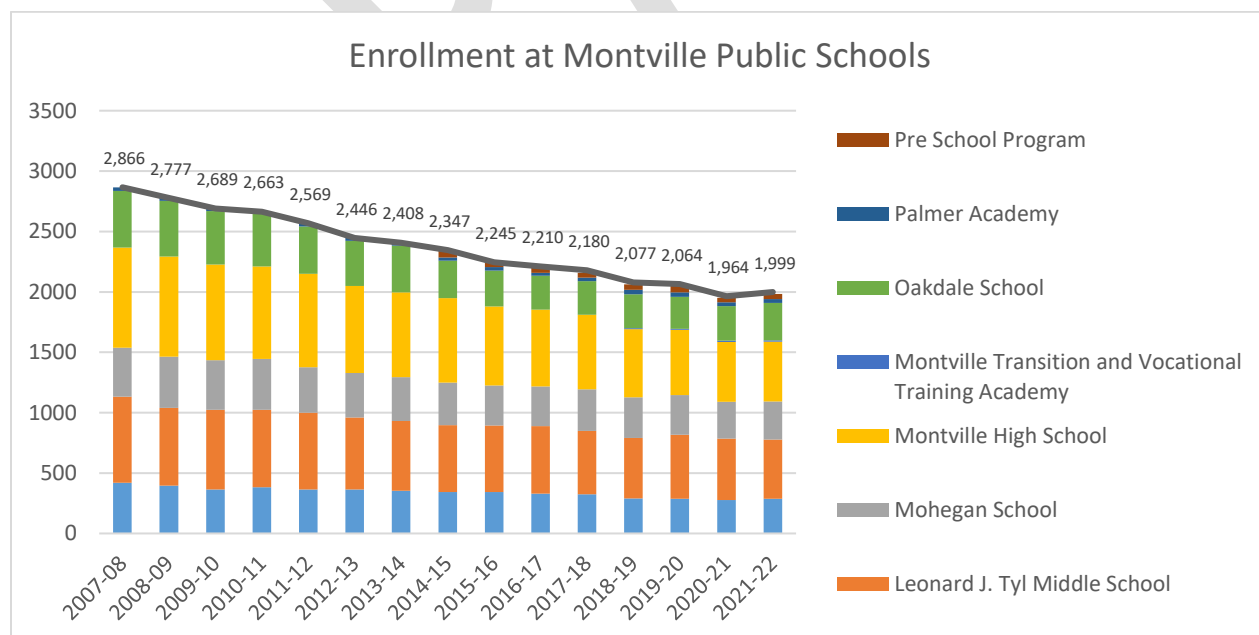


Figure 6. Montville Public Schools Enrollment, 2008-2022. Source: EdSight, Connecticut State Department of Education.



A common concern is that adding additional housing in town will result in many more school children in the district, potentially overwhelming the school system and requiring a new school. However, demographic changes in Montville and throughout the nation point to much lower birth rates and much smaller families than in decades past. In Montville, 20% of all households consist of just one person. Only 27% of all households in Montville have any children under the age of 18, with 73% of owner-occupied housing and 73% of renter-occupied housing having no children under the age of 18.

Southeastern CT Council of Governments recently published a report, “Residential Demographic Multipliers in New London County,” which analyzed 2018 ACS Census data to estimate the average number of school-aged children in different housing types in southeastern Connecticut. The average three-bedroom single-family owner-occupied house in New London County had 0.37 children (3.7 school children per ten homes), with the number of children increasing slightly to 0.54 children in a four-bedroom house and to 1.01 children for every five-bedroom house. For renter-occupied multifamily apartments, there are an estimated 0.03 school children per one-bedroom apartment, 0.25 school children per two-bedroom apartment, and 1.09 school children per three-bedroom apartment. A 10-unit apartment building with two-bedroom units might therefore be expected to contribute an additional two or three students to local enrollment, while a 10-unit single-family subdivision might add three or four additional students.

Bedrooms in Home/Home Type	One	Two	Three	Four	Five
Owner-Occupied Single Family	0.07	0.07	0.37	0.54	1.01
Renter-Occupied Multifamily	0.03	0.25	1.09	n/a	n/a

Figure 7. Average Number of Children in New London County Homes, 2018. Source: SCCOG, Residential Demographic Multipliers in New London County.

# Housing Production and Regulation in Montville

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## Zoning Regulations

SCCOG's 2018 Regional Housing Needs Assessment reviewed zoning regulations and the availability of vacant land in all of its member municipalities. The review revealed that large-lot, residential zoning is the most common allowed land use in the region, based on overall land area. New opportunities for single-family homes exist in all towns, while 14 of the region's municipalities have opportunities for multifamily development on land in or close to sewer service areas, and an additional four municipalities enable multifamily development in areas not served by sewer. Montville was identified as one of the 14 municipalities with undeveloped lands proximate to sewer service that allows some multifamily residential development.

The residential zones in Montville are the following:

- **Water Resource Protection Zone (WRP-160):** This zone is designed to protect water supply watersheds and groundwater sources. Minimum lot size is 160,000 square feet (3.67 acres).
  - Single-family residential by right (non-discretionary: applications are approved if they meet local requirements)
  - Cluster development and senior housing or active adult housing community by Special Permit (discretionary review by commission; involves a public hearing)
- **Open Space District (OS):** This zone is designed to protect environmentally fragile areas, particularly those with steep slopes. Minimum lot size is four acres.
  - Single-family residential by right
  - No Special Permit uses
- **R-120:** Areas that are usually remote from existing or planned public water and sewer services. Minimum lot size is 120,000 square feet (2.75 acres).
  - Single-family residential by right
  - Cluster development, active adult housing community, or senior housing by Special Permit
  - Manufactured Home Park by Special Permit if connected to municipal sewer and obtains water from a municipal or community water system
- **R-80:** Areas with reasonably good building land, but not conveniently located with respect to existing and planned public water and sewer services. Minimum lot size is 80,000 square feet (1.8 acres).
  - Single-family residential by right
  - Cluster development, senior housing, or active adult housing community by Special Permit
- **R-40:** Areas of medium to high density residential development. Minimum lot size is 40,000 square feet (0.92 acres).
  - Single-family, two-family, multi-family, and senior housing and active adult housing community by right
  - Cluster development and Manufactured Home Park by Special Permit

- **R-20:** Areas of high density residential development. Minimum lot size is 20,000 square feet (0.46 acres).
  - Single-family, two-family, multi-family, and senior housing and active adult housing community by right
  - Cluster development and Manufactured Home Park by Special Permit
- **Housing Opportunity Development (HOD):** Zone to encourage diverse housing types, including affordable housing. 30% of units must be deed-restricted as affordable housing. The HOD is a floating zone that requires a zone change application. Maximum density allowed is 14 units per acre.
  - Single-family detached or attached units permitted
  - Other multi-family types not permitted or allowed by Special Permit
- **R-20M:** Areas of high density residential development for multi-family housing. Minimum lot size is 20,000 square feet (0.46 acres) if served by public sewer, and 40,000 square feet (0.92 acres) if not served by public sewer. Maximum density is 18 units per acre.
  - Two-family, multi-family, and senior housing permitted by right
- **Commercial zones (C-1 and C-2):** Minimum lot size is 10,000 square feet if served by public sewers, and 40,000 square feet if not served by public sewers in C-1, and 40,000 square feet in C-2.
  - Mixed-use apartments (not on ground level) permitted by right
- **Route 32 Overlay Zone (OZ):** Areas intended to promote economic development.
  - Multifamily dwellings and apartments may be permitted

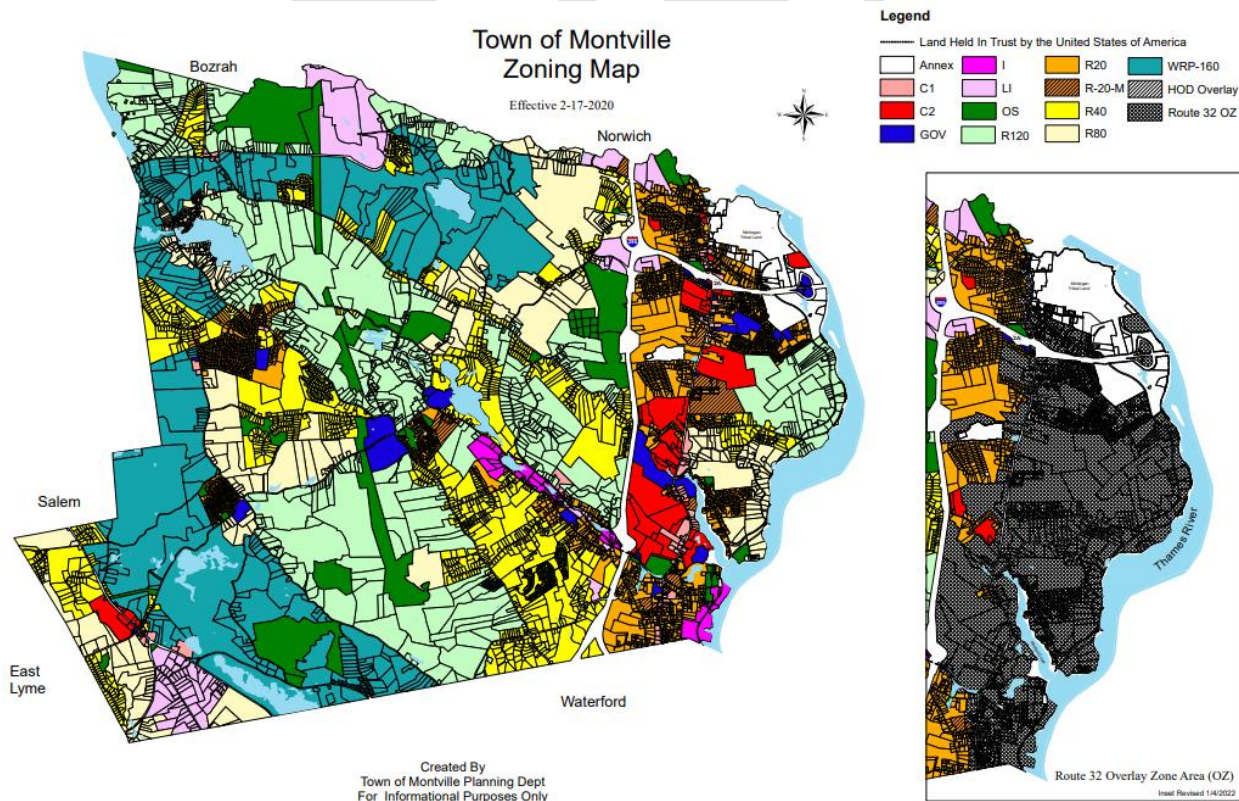


Figure 8: Town of Montville Zoning Map.

## Plan of Conservation and Development

The most recent Plan of Conservation and Development (POCD) in Montville was adopted in 2022. It notes that since the prior 2010 POCD, Montville has adopted several regulations in support of public housing, including accessory apartments, the R-20M zone, and the Housing Opportunity Zone. In the current Implementation Plan for the 2022 POCD, Goals and Actions are as follows:

- Housing Investment Areas
  - Designate areas within sewer district boundary (areas with existing public sewer systems) for higher density development, i.e. lots less than 20,000 square feet
- Conserve Existing Neighborhoods
  - Maintain and replace infrastructure in neighborhoods containing older housing stock, areas such as Montville Manor; offer affordable housing opportunities
- Diverse Housing
  - Allow on a long term basis, for the development of diverse housing types, including affordable housing, to help address identified needs

## Future Land Use

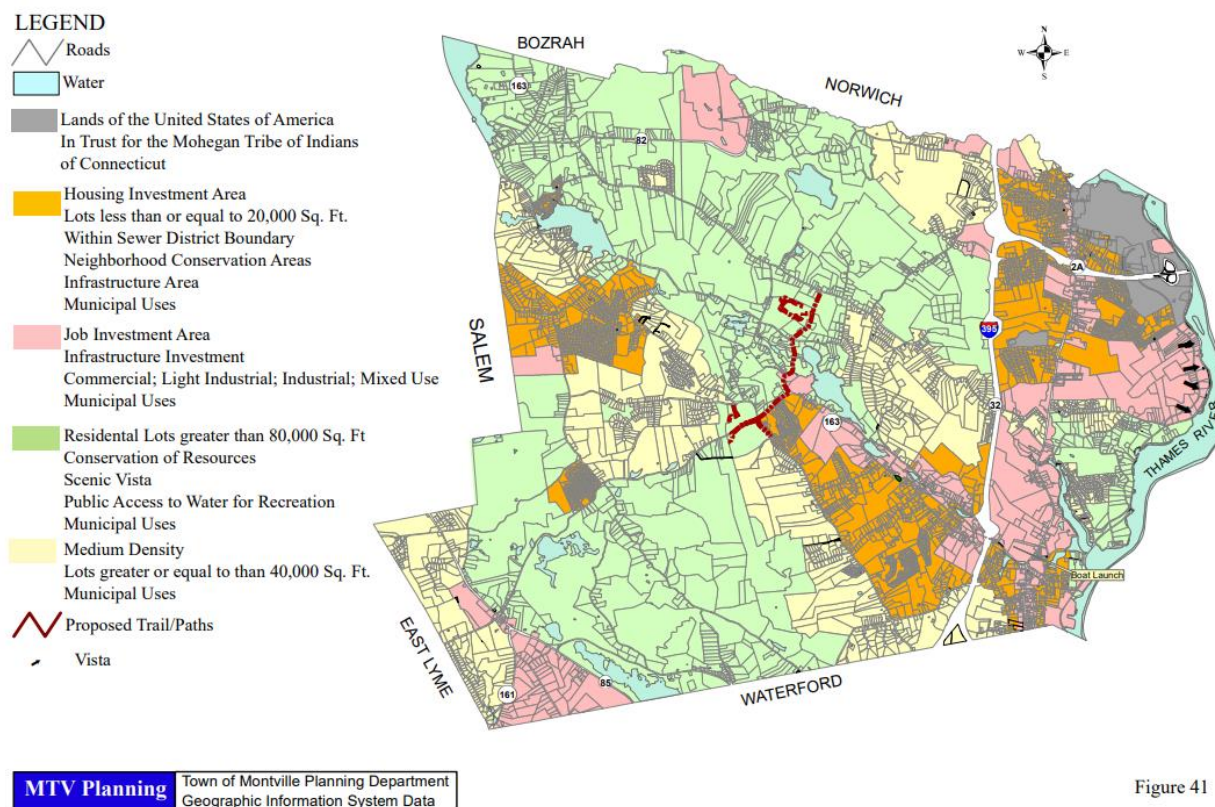


Figure 41

Figure 9: Future Land Use Map from 2022 Montville POCD.



## Affordable Housing Appeals Act (§ 8-30g)

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While the C.G.S. § 8-30j requirement for municipalities to adopt Affordable Housing Plans is independent of Connecticut's Affordable Housing Land Use Appeals statute, C.G.S. § 8-30g, any conversation about municipal policies regarding affordable housing should include consideration of how § 8-30g plays a role in housing production. C.G.S. § 8-30g was established in 1997 to enable the development of affordable housing in municipalities where zoning regulations would otherwise prevent its construction. Municipalities are subject to § 8-30g of the Connecticut General Statutes when less than 10% of local housing stock meets the statute's definition of affordable. Under 8-30g, municipalities must defend their denial of permits for developments that include a certain threshold of affordable housing on the basis of public interests in health, safety, or other matters clearly outweighing the need for affordable housing. The State of Connecticut's 2021 Housing Appeals List shows that 31 Connecticut municipalities have more than 10% affordable housing and are exempt from appeals, with the average share of affordable housing in Connecticut municipalities at about 6%. The Appeals List shows that about 5% of housing in Montville counts as affordable housing for the purpose of determining the applicability of the § 8-30g statute.

In determining the percent of affordable housing present in a municipality, the CT Department of Housing counts:

- ***Assisted housing units or housing receiving financial assistance under any governmental program*** for the construction or substantial rehabilitation of low and moderate income housing that was occupied or under construction by the end date of the report period for compilation of a given year's list. Recent public investments in affordable housing in southeastern Connecticut include Stonington's Spruce Meadows (new mixed-income apartments), Waterford's Victoria Gardens (mixed-income elderly apartments), and Groton's Branford Manor (capital improvements to existing 100% affordable apartments). Common sources of funding include the Federal Government's Low Income Housing Tax Credit Program and the State of Connecticut's Competitive Assistance for Multifamily Properties (CHAMP) program. Different funding programs can target different types of housing or affordability for households at different income levels. Most affordable housing developments that depend on government subsidies receive funding from multiple State of Connecticut or federal programs.
- ***Rental housing occupied by persons receiving rental assistance*** under C.G.S. Chapter 138a (State Rental Assistance/RAP) or Section 142f of Title 42 of the U.S. Code (Section 8). These Housing Choice Vouchers are a program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private rental market. Recipients typically pay 30% of their income with the voucher program paying the landlord the difference in rent.
- ***Ownership housing purchased with CHFA/USDA loans***: housing currently financed by the Connecticut Housing Finance Authority (CHFA) and/or the U.S. Department of Agriculture (USDA). This program allows qualifying first-time homebuyers to access a low-interest 30-year fixed rate mortgage, and may also provide down-payment assistance.
- ***Deed-restricted properties*** or properties with deeds containing covenants or restrictions that require such dwelling unit(s) be sold or rented at or below prices that will preserve the unit(s) as affordable housing as defined in C.G.S. Section 8-39a for persons or families whose incomes are

less than or equal to 80% of the area median income. These are often seen in larger single-family subdivisions or multifamily developments, where a percentage of units are set aside as deed-restricted affordable housing and may be internally subsidized by the market rate units.

Of the 382 total assisted units in Montville, 81 are government assisted, 54 have tenant rental assistance, 247 have CHFA or USDA mortgages, and 0 are deed restricted. In 2002, 6% of Montville's housing stock qualified as affordable housing – 97 government assisted, 322 CHFA or USDA mortgages, and 0 deed restricted (out of 6,805 total housing units as of the 2000 Census).

As mentioned, municipalities in which 10% or more of their housing inventory falls into the above categories are exempt from § 8-30g appeals. Municipalities may also be awarded four-year temporary exemptions by demonstrating progress in facilitating new affordable housing. The threshold for achieving a moratorium is new affordable housing created in the municipality equal to the greater of two percent of existing housing, or housing earning 75 "Housing Unit Equivalent" points. New housing qualifies for between ½ and 3 Housing Unit Equivalent points based on the size of the unit (more bedrooms earn more points), restrictions on occupancy (senior-only housing earns fewer points), and the affordability level of the unit (affordability to lower income levels earns more points).

The Town of Montville could achieve an 8-30g moratorium with as few as 55 new affordable homes (three bedroom family units affordable to families at 40% Area Median Income) or as many as 298 homes for senior-citizens at 80% Area Median Income.

## Community Input

As part of community outreach efforts for the Affordable Housing Plan, an online survey asked residents for their views on housing needs in their community. The survey received 81 responses. Respondents broadly agreed that seniors who need to downsize should have affordable options in Montville, and that children and young families are a sign of a thriving community. Respondents thought that families should have options such as “starter homes” in Montville and that investing in a range of housing options is an investment in the future of the Town. When asked what kinds of affordable housing respondents thought were a good fit for Montville, responses with the most support included single-family CHFA/USDA loans (33% support), income-restricted senior housing (27% support), and private developments with affordable set-aside units (26%).

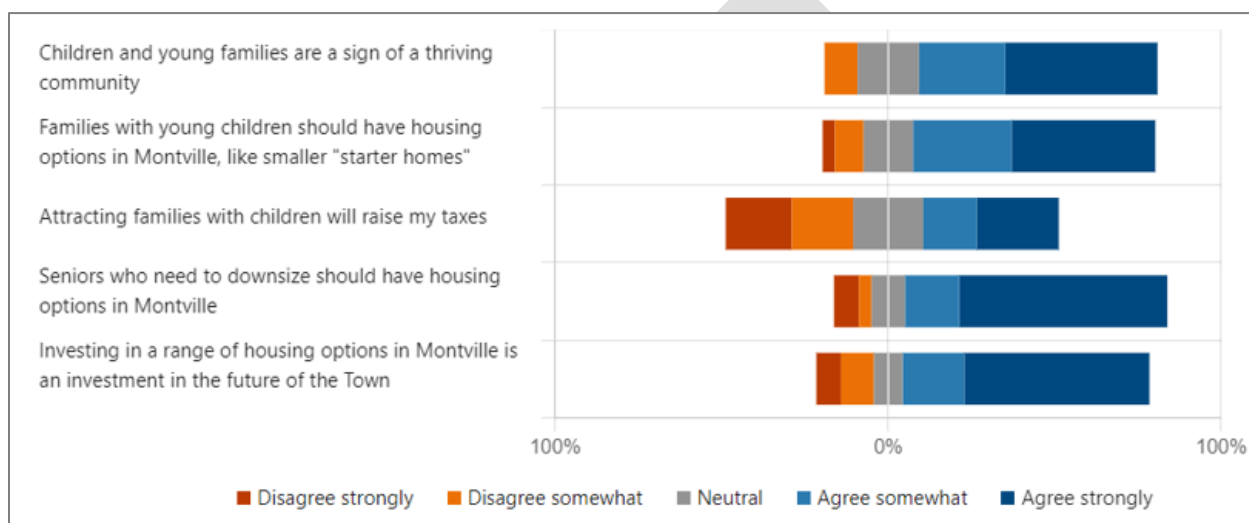


Figure 10: Montville Survey Responses (Question 1), 2022.

Respondents also answered open-ended questions. When asked, “What do you think are challenges to home ownership in Montville?” some themes in responses included inflated housing prices, taxes, maintenance costs, the need for a car, starter homes being turned into rentals, and lack of jobs that pay a living wage. In response to, “Have you, or any friends or neighbors in Montville, had a hard time paying your rent or mortgage or other housing bills in the last year?” themes from residents experiencing hardship included high taxes, job loss, and inflation increasing the price of food and goods.

## Action Plan

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Connecticut municipalities have flexibility in determining how they act to improve access to affordable housing. This plan proposes steps appropriate to the Town of Montville that may be taken with the goal of creating additional affordable housing units in Montville, consistent with the other development and conservation goals of the Town. This plan recommends the following:

### Increase Options for Elderly Residents

Existing Supportive Policies/Programs:

- Favorable zoning to allow elderly housing.
- Town Elderly/Disabled Tax Relief Program.

Additional Strategies:

- Consider expanding support for the Elderly/Disabled Tax Relief Program.
- Consider an RFP to developers to build more elderly housing in Montville. Inventory town-owned properties that may be suitable for development of housing.

### Support First-Time Home-Ownership

Existing Supportive Policies/Programs:

- 247 CHFA mortgages in town.

Additional Strategies:

- Work with local realtor community to publicize availability of USDA and CHFA low-interest home loans. Consider adding a “Prospective Homebuyers” page to the website that advertises these programs.
- Consider a 5-year tax rebate program for first-time homebuyers in Montville.
- Consider using Small Cities Grants or ARPA funds to start a down payment/closing cost assistance program for first-time homebuyers.

### Encourage Diversity in Housing Supply

Existing Supportive Policies/Programs:

- Designated R-20M zone for multifamily residential development.
- Accessory Dwelling Units permitted in residential zones.

Additional Strategies:

- Implementation of policies recommended in the 2022 POCD:
  - Evaluate progress of units built under the Town’s existing Affordable Housing Regulations



- Designate areas within sewer district boundary for higher density development, i.e., lots less than 20,000 square feet
- Consider using ARPA or Small Cities Grant funds to establish an affordable housing fund.
  - Hold workshops that teach homeowners with accessory dwelling units or area landlords how to put an affordable deed restriction on their ADUs or rental units. Funds can be used for educational materials or to fund an incentive program for deed restriction.
- Work with housing land trusts or other non-profits to acquire and rehabilitate existing housing for deed-restricted affordable housing.

#### Support Commissioner Continuing Education

- Support the continuing education of Planning and Zoning Commission members with ongoing training on: affordable housing issues, process and procedures, the Freedom of Information Act, interpretation of site plans, and the impact of zoning on the environment, agriculture, and historic resources on a biennial basis, per PA 21-29.

#### Update Zoning Regulations per PA 21-29 Requirements

- Delete references to minimum floor area requirements for housing, per PA 21-29.
- Adjust parking requirements to allow one parking space per one-bedroom unit, per PA 21-29.

#### Support Plan Implementation

- Review implementation of Affordable Housing Plan strategies on a quarterly basis.