

September 5, 2024

Caitlin Palmer, AICP
Director of Regional Planning & Development
Capitol Region Council of Governments
350 Church Street, Third Floor
Hartford, CT 06103

Dear Ms. Palmer,

The Office of Policy and Management (OPM) has reviewed the Draft Regional Plan of Conservation and Development that was prepared by the Capitol Region Council of Governments (CRCOG) and posted on your website. In accordance with section 8-35a(b) of the Connecticut General Statutes, OPM hereby determines that CRCOG's Draft Plan is not inconsistent with the *Conservation & Development Policies: The Plan for Connecticut, 2018-2023*.

It was a pleasure to review this comprehensive Draft Plan and I would like to commend you and your staff for your efforts in developing this important planning tool for CRCOG and its member municipalities. Attached, for CRCOG's consideration, are OPM's comments and recommendations for improving the Draft Plan even further.

Please do not hesitate to contact me with any questions on this and other related matters.

Sincerely,



Philip Shattuck
Planning Analyst
Office of Responsible Growth

In the proposed 2025–2030 State Plan for Conservation and Development, the cross-cutting reality of these goals for conservation and development was emphasized. CRCOG did a good job highlighting the overlapping goals in actions by cross-referencing back to other actions in many places.

CULTIVATE A GREEN AND RESILIENT FUTURE

Goal 2: Cultivate spaces that connect people to nature and their community.

Strategy 3: Integrate natural features (biophilic concepts) into development.

- Action #2: “Integrate nature-based designs...” This positions CRCOG well to be advocate for the integration of DEEP programs into DOT projects, where appropriate.

Goal 3: Reduce regional gas emissions and adapt to climate change.

Strategy 2: Connect communities with tools and resources to address climate change.

- Action #2: “Encourage municipalities to consider...” Growth Management Principle #1 and many state plans and laws are designed to encourage municipalities to do this very thing. When undertaking studies such as the Regional Housing Strategy, CRCOG has an opportunity to be a leader within its region by using that to directly encourage its towns.

Strategy 4: Ensure the region’s approach to climate change mitigation and adaptation provides for all aspects of equity.

- The 2025–2030 State Plan for Conservation and Development prioritizes equity as a guiding principle for state policies. Emphasizing “all aspects of equity” is a fundamental consideration to ensure the benefits of state and regional plans can be achieved by all residents.

DEVELOP A COMPETITIVE AND INCLUSIVE REGIONAL ECONOMY

Goal 1: Build regional economic development capacity and support.

Strategy 3: Improve the resiliency of our economy.

- This section could be more explicit in advocating for mixed-use zoning as a resiliency strategy, particularly in dense urbanized neighborhoods and village centers.

Goal 4: Invest in the power of “fun,” placemaking, and third places.

Strategy 2: Capitalize on placemaking. **and**

Strategy 3: Invest in Third Places.

- Pairing these ideas with the desire of young people and economic development – there are immense work-life balance benefits to these investments that will aid talent attraction and retention efforts. Those investments should be paired with the marketing strategies suggested throughout the document.

Goal 6: Ensure growth occurs in areas with adequate utilities.

Strategy 1: Prioritize the use of existing water and sewer infrastructure to guide future growth.

- Action #4: “Work with developers and town officials...” This action serves multiple purposes: it allows soft densification around village centers, which supports economic development and business success in villages, provides a greater variety of housing choice (when leveraged for “middle housing” developments), and can increase the population and tax base of the town without the use of sprawling housing development outside the village center.

REFORM OUTDATED “STEADY HABITS” IN OUR INSTITUTIONS AND GOVERNANCE

Goal 1: Improve public service delivery through robust shared services and partnerships.

Strategy 3: Seek regional or multi-town approaches to state-mandated governmental functions.

- Public Act 24-151 allows certain positions to be filled through arrangements developed by COGs. CRCOG can (and should) leverage their leadership role in shared services to give feedback on statutory improvements as municipalities engage these arrangements.

INVEST IN TRANSPORTATION OPTIONS FOR EVERY JOURNEY

Goal 1: Align transportation investments with land use, housing, and other development and place-making goals.

Strategy 2: Promote development along major rail and bus hubs and corridors.

- Action #2: “Discourage non-transit...” CRCOG can advance this particularly in its reviews of municipal Plans of Conservation and Development.

Goal 2: Expand transportation options for all users and purposes.

Strategy 1: Make transit a convenient, attractive, and viable transportation choice.

- Action #3: “Develop more comprehensive service...” When considering the accessibility of “opportunity areas”¹ for low-income residents, the level of transit service can be a key determinant of the success of a family’s move to a new area.

Goal 3: Address the burdens and costs of transportation.

Strategy 1: Create a greener and sustainable transportation network.

- Action #2: “Reduce air pollution...” Schools should be partners in this work, either by creating more efficient systems or finding ways to divert car trips for daily transportation to school.

Strategy 3: Reduce health, social, and financial transportation inequities.

- Introduction: While retaining the point that there are wide disparities in transportation access to healthcare by race and socioeconomic status, the JAMA statistic of 81.9 more minutes *per trip* for non-Hispanic Black respondents to reach health care facilities seemed exceedingly high. Upon inspection of the referenced data, 81.9 is the linear regression number in comparison to respondents of other race and income levels; the data showing time and distance shows the travel time to be a couple of minutes longer (22 mins vs 18–20 mins) and a longer distance (over 6 miles with others below 5 miles). The factual point remains that they travel farther for longer, but 81.9 minutes per trip is not supported in the data.

Strategy 4: Develop more efficient transportation funding practices.

- Action #1: “Seek creative options...” It is unclear which part of the previous strategy is being referred to.

EXPAND AND DIVERSIFY THE REGION’S HOUSING STOCK

Goal 1: Preserve the region’s housing stock.

Strategy 3: Ensure renters are not unfairly priced out of their homes.

- Action #3: “Explore and potentially advise on...” These “hot-button issues” are regularly discussed in legislative sessions the last several years, and should CRCOG decide to advise on these issues, they could lend valuable insight from research and municipalities in public hearings.

¹ The Department of Housing uses this label for communities that provide resources for generational economic mobility, such as educational facilities, quality healthcare facilities and access to quality jobs.

Strategy 4: Remove roadblocks to housing production.

- Action #3: “Explore mechanisms to reduce...” It seems the ending of this subtext should say “actively *discouraging* housing opportunities.”

Goal 2: Increase affordable housing in the region.

As of August 2024, there are only three of the region’s communities that have not adopted an affordable housing plan.

Strategy 1: Provide support to member municipalities to increase affordable units and administer affordable housing programs. **AND** Strategy 2: Seek regional approaches to producing affordable units.

- Paired with earlier actions concerning different types of density of housing for certain areas, often people need help matching expectations and needs for affordable housing. Affordable housing can take not only different densities but also different types, such as workforce housing, supportive housing or elderly housing. When undertaking the Regional Housing Strategy, identifying which types are appropriate for each community would be helpful to garner support from townspeople.

Strategy 3: Actively work to preserve affordability of units with expiring deed restrictions.

- Action #3: “Work with municipalities and stakeholders...” The Connecticut Housing Finance Authority coordinates programs that rehabilitate expiring units to extend their affordability restrictions, and CRCOG could be a conduit for smaller-staffed towns to leverage these programs in their towns.

FINAL THOUGHTS

This Plan of Conservation and Development considers a wide array of issues facing the region. It is laudable for CRCOG to think through so many issues. However, OPM has some suggestions to help readers navigate and consider the utility of this vast document:

- This plan referred to several other plans that CRCOG must craft and regularly update. A note relating this plan to other plans and CRCOG’s Strategic Playbook would make this a more helpful tool for people interested in how CRCOG’s prioritized ongoing work across its several buckets of work relate to land use in the region.
- While the end of each theme area contained a summary of actions, providing an appendix compiling the summary of actions would help summarize information currently scattered throughout the document. That appendix could be enhanced by noting which agency (i.e., CRCOG or municipalities) would take the lead on action items.