

Exhibit D
Soundness of Approach

Lower Connecticut River Valley Council of Governments

What is your vision?

The Regional Plan of Conservation and Development (RPOCD) and Regional Housing Plan (RHP) identified high opportunity areas that can serve as vibrant, active, higher density housing and job centers across the region. These locations support the region's sustainable growth approach because they have the best access to infrastructure, the lowest impact on connected open space networks, and an existing degree of greater development concentration. It is the region's goal to connect these hubs, once established, through a high quality, multimodal transportation network. This vision is articulated in the Metropolitan Transportation Plan 2023-2050, Regional Bicycle and Pedestrian Plan 2022, and Lower Connecticut River Valley Transit Study 2020. Ensuring safer access for pedestrians, cyclists, and transit users will also be addressed in the upcoming Safe Streets and Roads for All funded comprehensive transportation safety plan.

As stated in Exhibit C, generating growth in these high opportunity areas is essential for the region to reverse troubling demographic trends, grow jobs, reduce single occupancy vehicle trips, protect important natural resources, and increase diversity and opportunity. The region is focused on ensuring that affordable housing is an integrated component in any stimulated growth and that all growth is sustainable and equitable.

While the RPOCD and RHP identified high opportunity areas at a regional level, these plans did not zoom in to create a specific vision for each area or analyze the physical and regulatory challenges that might prevent that vision from being realized. RiverCOG proposes to use the PRO Housing grant funds to take these next steps through a four phased approach.

Phase 1 - Area Selection & Land Capacity Analysis. Up to six high opportunity sites ("hubs"), as identified in the RPOCD and RHP, would be studied to determine appropriate parameters for an area specific plan. Once the parameters are set out, a land capacity analysis would be conducted to assess the amount and mixture of development that the land could reasonably support. This assessment would take into consideration septic and water limitations, terrain challenges, environmental resources, and remediation needs for brownfield sites. Phase 1 would produce a Land Capacity Analysis that would provide guidance on the maximum development capacity of the site.

Phase 2 – Visioning & Public Engagement. With an understanding of the site's buildout capacity, the second phase would focus on creating a vision through public engagement. The public engagement exercises would be robust and include outreach to residents, business owners, commissioners, non-profit partners, developers, and individuals that are currently under- or unrepresented in the region. The goal of the outreach would be to answer the following questions: 1) What do community members want to see on the site; 2) What ideas can the land use commissions (implementing entities) get behind; and 3) Is this serving the need for the municipality and the region? The visioning exercises and public engagement would inform the creation of several buildout scenarios, complete with renderings, from which a preferred scenario can be selected. This phase would result in a site-specific plan for each opportunity area which will include, at minimum, mixed income development (including for 30%, 60%, 80% Area Median

Income) with a variety of housing types and tenure, employment, recreation, public space, and multimodal transportation access.

Phase 3 – Regulation and Implementation. Once the plan for the opportunity area has been drafted, a review of current regulations controlling development in that area would occur. New regulations would be created specifically for the opportunity area that would allow and encourage development to occur in conformity with the site-specific plan. The plan and the regulatory changes would be marketed to developers and partner organizations to spur development or redevelopment in the area.

Phase 4 – Creation of a Regional Land Bank. A land bank is an important entity for the preservation and creation of affordable housing in the region. Because the region is focused on infill and redevelopment to create affordable housing opportunities, an entity able to purchase property, particularly brownfield sites, for the purpose of redevelopment or rehabilitation can aid in the implementation of the site-specific plans. The Regional Housing Committee has the authority to expand into a regional land bank. Alternatively, a regional land bank can be created as a separate partner entity. The formation of the land bank would occur concurrent with the creation of the site-specific plans. Its focus would be on the areas for which the plans are developed with an opportunity for expansion of operations over time.

RiverCOG has hosted the Lower Connecticut River Land Trust since its incorporation in 1988. Over this time RiverCOG and predecessor agency staff have supported land trust activities and become knowledgeable in land acquisition and stewardship. This experience gained from our regional land trust will be incredibly valuable to the creation, hosting, and operation of a regional land bank for housing.

Addressing Needs and Key Barriers. In Exhibit C, five categories of barriers were identified that prevent the creation of affordable housing in the region and frustrate progress toward the regional vision - the proposed approach addresses each.

Physical. By conducting a capacity analysis of each opportunity area, a plan can be developed with full understanding of the limitations of the land. Plans will reflect densities that we know are supported by physical limitations (steep slopes, flood plains, and wetlands), capacity of sites for onsite well and septic, existing infrastructure (sewer and water) or extensions that may be possible, and natural resources can be integrated into the design as open space, viewsheds, or trail networks to the benefit of all.

Regulatory. By creating a plan for each site-specific area, a roadmap will be set out to guide necessary regulatory changes. Regulatory changes will be made as part of this effort to allow and encourage development according to the plan. One of the biggest impediments to development is a fear of a drawn out and acrimonious planning and zoning approval process, that provides little certainty to a developer. The creation of site-specific plans, with robust public involvement will facilitate approvals because public input and support has already been obtained. We believe that this approach will help redefine communities' reputations as being hostile to development and difficult to build in.

Financial. There is a symbiotic relationship between housing, jobs, and population – positive trends for each are necessary to support a strong housing market and encourage development. The site-specific plans will incorporate a variety of housing types (including affordable) and jobs in a mixed-use, vibrant, accessible area that will attract a variety of people to the region. These plans and the regulatory changes will be marketed to generate enthusiasm for development. The land bank will also serve as an important component to hold important properties and remove barriers to affordable housing development while the market is cold.

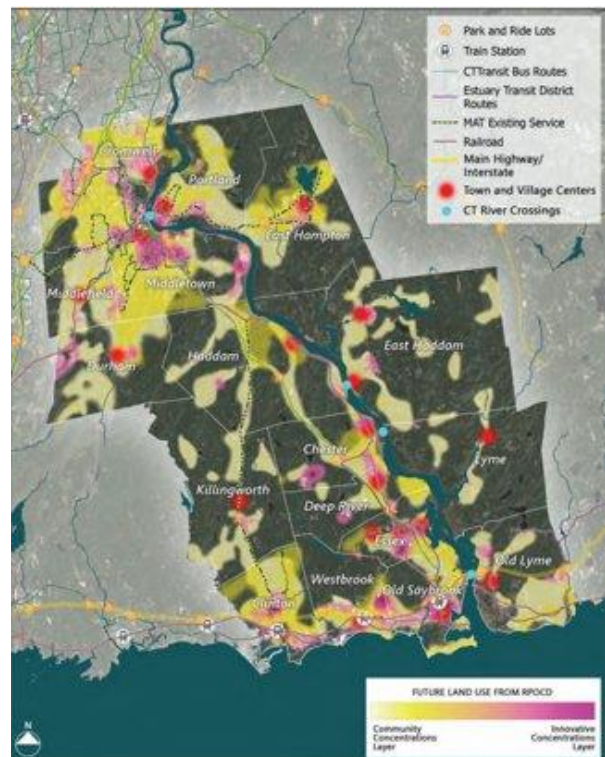
Education of the Public. Part of the negative public reaction to previous housing development proposals or regulatory changes is caused by fear of the unknown and a loss of control. By engaging the public and land use commissioners in a meaningful way, we can address unconscious bias and give them ownership of the vision, resulting in less fear moving forward. When new development proposals arise that are consistent with the vision, there should be a greater degree of enthusiasm. This approach has worked well for the region in garnering support for other planning efforts and has allowed RiverCOG to build a large degree of trust with the region’s municipalities.

Capacity. The PRO Housing funding would most directly impact the region’s capacity for achieving its vision for more diverse and vibrant communities that have housing for people of all income levels and stages of life. While the region has been making progress, it has been slow. The PRO Housing grant would allow us to hire a multi-consultant team to create plans for six opportunity areas in six years as well as provide the startup funds to create a regional land bank.

What is your geographic scope?

RiverCOG is the Metropolitan Planning Organization (MPO) and Regional Planning Organization for the seventeen municipalities of the Lower Connecticut River Valley region – Chester, Clinton, Cromwell, Deep River, Durham, East Haddam, East Hampton, Essex, Haddam, Killingworth, Lyme, Middletown, Middlefield, Old Lyme, Old Saybrook, Portland, Westbrook. RiverCOG is the county equivalent government for federal purposes for the Lower Connecticut River Valley Planning Region.

RiverCOG proposes to focus on six opportunity areas, identified by the dark yellow and purple shading on the map, to create area specific plans. The six opportunity areas ultimately selected will be geographically representative of the region, with two in the north, two in the center, and two in the south. This geographic breakdown also represents the region’s three housing market areas identified in the RHP. Although only six specific sites will be selected, implementation of the area



specific plans will benefit the entire region by furthering the sustainable growth vision. By focusing housing in high opportunity areas across the region, larger connected swaths of native landscape and important habitat corridors can be preserved, and better multimodal connections can be provided to reduce greenhouse gas emissions. Further, we will be providing access and opportunity across the region for previously unrepresented or underrepresented groups, which will enrich the region as a whole.

Who are your key stakeholders? How are you engaging them?

This project will engage a broad range of stakeholders to ensure that housing needs are being met and that implementation and development will proceed smoothly. Input for this proposal came from the region’s existing plans, discussion with the RiverCOG Board, conversations with municipal planners, and feedback from the RHC. The RHP provided an early analysis of the housing needs and market conditions and the RHC is broadly representative of the housing and development industry. Both provided valuable information in creating this proposal. These groups, and others, will be engaged throughout the grant process as described below.

Officials, Commissioners, and Staff. The elected and appointed officials of the municipalities, the planning, zoning, and economic development commissions, and associated staff will have a primary role in implementing any plans and regulatory changes that emerge from this process. Regular multi-commission working group sessions will occur throughout the project to ensure that all parties support the proposals.

Regional Bodies. The RiverCOG Board, Regional Housing Commission, Regional Planning Commission, and Middlesex Chamber of Commerce have large networks across the region and consider regionwide impacts and benefits of development proposals. These groups will be updated and engaged through regular monthly meetings and their networks will be utilized to ensure information about the project is reaching a broad audience. The Regional Housing Committee would also serve as the steering committee for the project.

RiverCOG has a close relationship with the Estuary Transit District (ETD), the operator of fixed route and paratransit services in the region. ETD was recently reformed and rebranded through a merger following a RiverCOG plan. ETD has a seat on the MPO board and RiverCOG currently has a planner on loan to ETD working on merger plan implementation. In our regional economic strategic plan Grow Smart from 2016 and our recently completed Comprehensive Economic Development Strategy 2023, our regional economy depends on housing and transit to provide workers to our businesses. ETD will be a key partner in coordinating housing investments with transit services and future expansions.

Member of the Public. Residents, workers, private property owners, businesses owners, seasonal residents, and other interested parties will be given ample opportunity to participate. This group will be provided with regular information updates via the project website, popup events, virtual meetings and in-person question and answer sessions. They will also be invited to participate in visioning sessions throughout Phase 2 of the project, which will be both virtual and in person charrette style events. The public will play a critical role in shaping the area specific plans, and their opinion and education will be vital.

Non-Profit Partners. Interviews with non-profit organizations that focus on housing and homelessness, such as the United Way, HOPE Partnership, and the Shoreline Basic Needs Task Force, will occur regularly throughout the project to ensure that needs are being met. HOPE partnership and other non-profit housing developers will also be engaged as partners in the drafting of regulations and the development of housing in Phases 3 and 4 of this project.

Empty Chair. The creation of a Diversity Equity and Inclusion plan for engagement is an important component of this project. The region is largely homogenous and has struggled to connect with racial and ethnic minority groups that past practices have largely excluded from the region. A consultant will be used to assist RiverCOG in reaching these groups and understanding their needs. The DEI outreach plan can then also be used by RiverCOG in future planning endeavors to increase representation.

How does your proposal align with requirements to affirmatively further fair housing?

The Lower Connecticut River Valley region is a high resource, high opportunity area, with quality education, low crime, and attractive natural resources. Through this proposal, the region is seeking to expand housing variety in the region, including affordable housing, in targeted high opportunity areas. These areas will include mixed income development (including for 30%, 60%, 80% AMI) with a variety of housing types and tenure, employment, recreation, public space, and multimodal transportation access. This variety of housing price and type is not currently available in the region, which is primarily zoned for large lot, single family residential units. This has historically prevented many racial and ethnic minorities from living here. Additionally, there is no displacement expected due to this proposal; the areas proposed for study do not currently include housing that would be lost.

By actively planning for, and zoning for, this mixture of housing, with broad public education, visioning, and support, the region can address capacity barriers, regulatory barriers, physical barriers, and public barriers that have contributed to segregation. Progress toward advancing racial equity will be monitored through changes in census data and school enrollment.

In addition, housing will be provided in a mixed-use environment, served by multiple modes of transportation. Universal design for ground level units will also be incorporated into the area specific plans. These changes will create opportunities that do not currently exist in the region for residents to access their daily needs through walking, biking, or public transportation and will improve access for the region's aging population and for persons with disabilities.

We will also assess and develop approaches to address substandard housing in our region. The most affordable housing is typically also the oldest and more substandard. There will be an emphasis on the healthfulness and energy efficiency of existing substandard housing in our region.

What are your budget and timeline proposals?

Budget. This proposal is for three complex planning efforts at six high opportunity sites: 1) Land Capacity Analysis; 2) Area Specific Plan; 3) Regulatory Framework. This is a total of eighteen plans. It is anticipated that a multi-consultant team would be used to ensure that these plans can be completed within the six-year time frame. The consultant team would include a public engagement

specialist with advanced skill in reaching underrepresented and marginalized communities. The total budget for the planning effort is \$1,650,000, or \$275,000 per site. This budget was based on previous planning projects and discussion with consultants in relevant fields. It represents an ideal amount for completion of the tasks. In addition, RiverCOG is requesting \$350,000 to fund the startup of a regional land bank. Based on research and conversations with other land banks in the state, RiverCOG understands this to be the typical amount for startup costs. Budget details can be found in the table below.

Task	Per Site (1)	All Sites (6)
Phase 1	95,000	570,000
Site Evaluation	15,000	90,000
Capacity Analysis*	50,000	300,000
Buildout Analysis	30,000	180,000
Phase 2	120,000	720,000
Public Engagement - Round 1	20,000	120,000
Visioning and Scenario Development	50,000	300,000
Public Engagement - Round 2	20,000	120,000
Scenario Selection and Plan Creation	20,000	120,000
Public hearings and adoption of plan	10,000	60,000
Phase 3	60,000	360,000
Review of existing regulations	10,000	60,000
Draft implementation regulations	20,000	120,000
Joint Commission working sessions	20,000	120,000
Final implementation regulations	10,000	60,000
Total	275,000	1,650,000
*Includes potential brownfield environmental study		
Land Bank	startup costs	350,000

If RiverCOG receives less funding than is requested, the proposal will be adjusted accordingly. Depending on the amount received, RiverCOG could reduce the volume of graphics, the number of scenarios created, the amount and robustness of public engagement, or the number of sites studied. RiverCOG could also attempt to start the regional land bank with reduced funds or forgo the creation of the land bank at this time.

Timeline. RiverCOG assumes that the grant administration will occur quickly and the project can kickoff in February 2024 with the posting of the RFP. RiverCOG anticipates a potential four consultant team to allow overlap of tasks. Schedule details, including phases and key milestones for all sites can be seen in the spreadsheet below.