

2020-2030 Western Connecticut Regional Plan of Conservation and Development - All Comments and Responses

Date	Comment Period/Meeting	Comment	WestCOG Staff Response	How was the comment addressed?
8/21/2019	Town Planners	Thank you for the opportunity to review this document. I suggest that an Executive Summary be created at the beginning to pull out the highlights of the document being that so much information is presented.		An Executive Summary was added and can be found on pages 8-13.
8/21/2019	Town Planners	Also, on the sheet numbered "29" at the bottom: The correct spelling of the river in Newtown is Pootatuck.		Corrected.
8/28/2019	Town Planners	<u>Scarce Resources Affect the Region</u> p. 4 The draft Plan indicates that "none of region's cities own their own watershed"; the text should be revised to acknowledge the reservoir owned by the First Taxing District which supplies drinking water for roughly half of Norwalk's population. (see CT. DPH for source info) DPH website: https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/pdf/Status_Summary.pdf	No municipalities in the region own all of the land in their water supply watershed, the plan states "Unlike major cities such as Boston and New York, none of the region's cities own major watersheds capable of sustaining populations found in mega-cities like New York or Washington DC."	
8/28/2019	Town Planners	<u>Shortfalls in Affordable Housing</u> p. 5 This section neglects to show that three of the region's municipalities actually exceed the State mandated percentage of affordable housing. The text should be revised to add this information for the cities of Danbury (10.83%); Norwalk (12.75%) and Stamford (15.12%) (see DOH for reference) to indicate that the regions 3 cities, which constitute the bulk of the populations and employment base, comply with 8-30g requirements. DOH website: https://portal.ct.gov/-/media/DOH/Final-Appeals-Summary-2018.pdf?la=en	This is addressed in detail in the Housing section of the plan, see page 61.	
8/28/2019	Town Planners	<u>Impermeable Cover</u> p.21 The chart % Impermeable coverage shows Norwalk's total land area as 14,753,6 acres which differs from that shown by the 2010 Census which lists Norwalk as 22.86 square miles (roughly ±14,630 acres). It would be helpful if WCCOG should clarify the source of this information and explain the difference between this and the Census Bureau's estimate. (See Geography information at bottom of link below) https://www.census.gov/quickfacts/fact/table/norwalkcityconnecticut/PST045218		Footnote added to explain how land area was calculated using the area of watershed basins in the region and the data layer uses a different geographic projection than the Census estimates.

<p>8/28/2019 Town Planners</p>	<p><u>Renewable and Electricity Infrastructure/Solar Access:</u> p.38 Norwalk has seen a marked increase in the use of solar power by both residential and commercial customers. This section should be revised to provide examples of innovative solar powered technologies such as the new parking facility at 542 Westport Ave in Norwalk which combines energy efficient lighting with a large solar panel array to reduce energy use; funded by C-PACE, and visited by Governor Malloy in 2013 https://www.stamfordadvocate.com/news/article/City-celebrates-state-s-first-C-PACE-clean-energy-4422073.php</p>	<p>Thank you for this example, however the plan would be lengthy if we gave examples for every municipality.</p>
<p>8/28/2019 Town Planners</p>	<p>Infrastructure & Climate Resiliency: See references to Chapter 9 Coastal Resources & Resilience in draft Norwalk POCD for examples of impacts anticipated from sea level rise. We are in the process of revising this section to address DEEP comments on the critical nature of resilience planning; which affects other municipalities in the WCCOG region. http://tomorrow.norwalkct.org/wp-content/uploads/2019/02/Complete-POCD-Draft.pdf</p>	<p>Sentence added to infrastructure section on page 56 to discuss fiscal investments in areas of sea level rise.</p>
<p>8/28/2019 Town Planners</p>	<p>Affordable Housing – Zoning Strategies: pp. 44-49 Norwalk is pursuing a review of our zoning regulations to address future housing needs including possible changes to increase the % of workforce housing in new developments and the number of accessory apartments as well as to encourage “micro-units” to increase the variety of housing types available. Please note that the definition of family was recently changed in Norwalk from 5 unrelated persons to 3 unrelated persons. (see 2018 definition below) FAMILY – A person living alone, or a group living together, as a single non-profit housekeeping unit and sharing common bathing, sleeping, cooking and eating facilities, and sharing at least one common living room space. Said housekeeping unit may include any number of people related by blood, marriage, adoption or legally recognized foster relationship, but shall never include more than three (3) unrelated individuals.[Amended effective 1-8-1974; amended effective 8-10-2018]</p>	<p>Family definition for Norwalk addressed on page 67.</p>
<p>8/28/2019 Town Planners</p>	<p><u>Land Use/Potential Growth Map:</u> pp. 52-53 The Regional Center should be expanded to include the Merritt 7/Glover Avenue area just north of the Merritt Parkway and adjacent to the Merritt 7 RR Station. The pending POCD for the City of Norwalk includes this area for additional growth with large scale office/employment along with multifamily developments envisioned See Chapter 3: Centers of Economic Activity map on p.45 and p. in draft POCD: http://tomorrow.norwalkct.org/wp-content/uploads/2019/02/Complete-POCD-Draft.pdf</p>	<p>This area is shown as a growth center on the Potential Growth Area Map found on page 72.</p>

8/28/2019 Town Planners	<p>· <u>Major Industries:</u> p. 52 This section of the Plan should include nationally recognized employers with headquarters located in the region; including FactSet (8,885 employees), Datto (with 1,400 employees; now part of AutoTask), Booking Holdings (22,500 employees) and HEI Hotels (3,250 employees) among others; all with headquarters located in Norwalk. Norwalk has recently hired a new Chief of Economic and Community Development to better coordinate our outreach to new and growing companies in Norwalk.</p>	<p>This section is discussing the largest employers of the region. While these companies may be headquartered here they are not the largest employers, for example - Booking Holdings only employs 250-499 employees at the Connecticut office.</p>	<p>Changed section title to "Major Employers"</p>
8/28/2019 Town Planners	<p><u>Zoning and Community Character:</u> pp. 60-63 Village districts should be encouraged throughout the region as a method of encouraging economic development while preserving community character. The City of Norwalk has been at the forefront in the creation of village districts: including two of the State's earliest district adopted in 2003 and one of its most recent the Silvermine Tavern Village District adopted in 2008 and amended in 2014; which has resulted in the rehabilitation of this historic tavern which now operates as the Inn at Gray Barns and has become a popular attraction for locals and tourists to the area https://www.graybarns.com/ http://www.ctvisit.com/listings/tavern-graybarns</p>	<p>We agree, village districts are discussed at length on pages 80-81 of the plan and adopting more village districts is a policy #4 recommended in the Community Character chapter of the plan.</p>	
9/3/2019 Town Planners	<p>Would be helpful to have a Map/image showing all of the WestCOG municipalities near the beginning of the document. This is important.</p>		<p>Map added on page 20</p>
9/3/2019 Town Planners	<p>"Oscalata" well field/aquifer in Ridgefield should be "Oscaleta."</p>		<p>Corrected.</p>
9/3/2019 Town Planners	<p>We believe there should be a subsection on winter road treatments and the big picture issues surrounding the use of salt, or other products, by the municipalities, in the water supplies and water resources section. Even identifying what each municipality's public works department uses and how much (e.g. Ridgefield uses mostly sodium chloride and about 4,500 tons per season on average), would be a good first step.</p>		<p>Paragraph added to Water Supplies section of the plan, pages 88-89.</p>
9/3/2019 Town Planners	<p>There is no "table above" which is referenced on page 32.</p>		<p>Corrected</p>
9/3/2019 Town Planners	<p>We believe a small section should be added about "multi-generational housing" in the Housing section. See link to a recent article: https://www.fastcompany.com/90342219/the-future-of-housing-looks-nothing-like-todays</p>	<p>Addressed in the Affordable Housing - Zoning Strategies section. Pages 64-68</p>	
9/3/2019 Town Planners	<p>The Section: "Bicycle and Pedestrian Friendly Development: on page 64 seems out of place.</p>		<p>Agreed, moved to Infrastructure section on page 41</p>

<p>9/19/2019</p> <p>COG Council Meeting - Verbal</p>	<p>The Council recommended adding a section on fifth generation broadband to address upcoming rollouts in the region</p>	<p>Section added on page 38-39 to discuss 5G and recommended policies were added on page 58 to assemble a task force to address a coordinated development strategy</p>
<p>12/3/2019</p> <p>Public Comment Period</p>	<p>Section: Executive Summary Paragraph: Sewer Avoidance Strategies Page 10 While there are residential areas greater than one acre in Brookfield, for example, some are in older sections adjacent to rivers in what would normally be riparian zones and have a high water table. This is likely true of other towns in the Western Connecticut region. These areas with high ground water cannot support code-compliant septic systems. Other areas that cannot support code-complaint systems are where the depth to till (impervious rock) is small. So, the only exception to this section could be sewers can be considered where pollution challenges to waterways exist in areas that cannot support code-complaint septic systems.</p>	<p>This scenario is addressed in more detail in the Sewer Avoidance Section found on pages 41-43. Sewers should not be extended as they would not be a cost-effective investment. Community Sewer Treatments plants are more cost effective (pg. 43)</p>
<p>12/3/2019</p> <p>Public Comment Period</p>	<p>Paragraph: Sewer Service Page 10 This section is overly optimistic. While the current treatment capacity in the region may be 29.2 MGD, it is not always in the right place. Some sewer shed regions will not support much growth. Consequently, it is unlikely that the region can accommodate 390,000 additional people in areas served by sewers. For example, Danbury is upgrading the Wastewater Treatment Plant to meet EPA phosphorus discharge permit requirements. But when it is all done, that plant is projected to operate at 90% capacity when it is commissioned in 2022.</p>	<p>We agree, the maximum build out potential for the region will be an issue that will be addressed in the future as more data is collected on the land constraints within the region and ever evolving Waste Water Treatment Plant constraints.</p> <p>Addressed on page 44 to include phosphorus discharge discussion.</p>
<p>12/3/2019</p> <p>Public Comment Period</p>	<p>Paragraph: Water Supplies and Resources Page 12 Evidence shows that smaller water supply wells above areas served by septic systems are heavily influenced by septic sources. While the bacteria are removed, the nitrogen and PFAS levels are concerning. More needs to be done to understand the current water supply situation for areas served by aquifers as well as those served by private and corporate water companies.</p>	<p>This is only the executive summary, see a more detailed explanation in the water supplies chapter. There are recommended policies regarding protecting potential aquifers and sewer avoidance strategies.</p>

<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: 6. Climate Change in Connecticut Page 16 Solar farms in particular are becoming more and more controversial. Not only because they reduce forest and farmland, but also because of the negative impact of stormwater run-off that needs to be carefully managed when forests and farms are repurposed. The end of this section does indeed seem to cover this factor after careful reading. But for the most part, municipalities do not have the expertise or sophistication in place to create and implement environmentally competent strategies to manage the siting and oversight of solar and wind farms. That function might be best handled with regional expertise.</p>	<p>This addressed in more detail in the Renewable Energy Section of the plan. This is just a brief summary for the introduction.</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: 7. Shortfalls in Affordable Housing Page 16 Affordable housing is a controversial subject. It tends to bring more young families that pay lower taxes settling in areas with a lower grand list value. This demographic contributes a disproportionately to services such as roads, schools, police and social services. With an increase in Affordable Housing an uptick in crime is evident in the region. I reference a contemporary December 2, 2019 article in by ctmirror.org entitled, "Why affordable housing is built in high crime areas." The two elements seem to go together. It should be acknowledged to plan to exercise appropriate security precaution with the introduction of more Affordable Housing.</p>	<p>Reference to crime and affordable housing generalizes the impacts of low-income populations. While low income housing may have greater reliance on public services, the reduction/elimination of low income housing is neither a state, regional or local goal.</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Regional Planning in Western CT: Its History and Purpose Page 18 Significant regional cooperation is necessary for elements such as the Greenway proving recreational benefits. The Still River Greenway is the second most used Greenway in CT and might have an honorable mention here. It may not be a fit, but the document does not mention significant initiatives some municipalities are investing into restoring their downtown/town center areas.</p>	<p>Addressed in more detail on page 41. Regional pedestrian and bicycle connections are discussed in more detail in our Long Range Transportation Plan found on our website here: https://westcog.org/wp-content/uploads/2019/05/SWRMPO-LRTP.pdf</p> <p>Greenways section added to the plan and can be found on pages 95-96 of the plan</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Riparian Corridors Page 28-29 This section cites a USDA paper, A Guide for Streambelts. Much of the existing riparian and hardwood forest areas, at least in Brookfield, are heavily impacted by invasive species. There seems to be no acknowledgement of this state of affairs and no local or regional plan to address this issue.</p>	<p>Paragraph added on page 99 to discuss invasive species in the open space section of the plan</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Bicycle and Pedestrian Friendly Development Page 41 Some of the 13 list items are addressed by the Greenway initiatives. There is a very good treatment of Greenways here.</p>	<p>Greenways section added to the plan and can be found on pages 95-96 of the plan</p>

<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Sewer Avoidance Strategies Page 41 This is an excellent section to offer guidelines of where sewers should not be installed. However, this region is like most of the US where lakes are suffering from an overabundance of aquatic weed growth and algae. For the river and lake watersheds in Brookfield, it is not failing septic systems that are the challenge. Those are few. Even properly functioning systems do not remove nutrients. Rather nutrients are transported to lakes contributing to their decline. In some instances, adding sewer service to higher density septic clusters will be an environmental silver bullet. This was the experience at Lake Kenosia in Danbury with the addition of sewer service circa 2016. In such instances sewer service should not be discouraged. Thank you for the mention of Brookfield study to determine the best means to address the wastewater management issues in areas adjacent to Candlewood Lake. It is expected this will be instructive not only for Candlewood Lake, the largest lake in CT, but serve to give insights to lakes in the US where the surrounding watersheds are highly developed.</p>	<p>The plan discusses alternative technologies that are more cost-effective than sewer extension to rural areas, such as community leaching systems or smaller scale community sewer systems. That being said, it is critical that any sewerage system projects be explicitly included in the municipal plan of conservation and development as required by Public Act 15-95.</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Economic Development Summary Page 78 Items 1, 4 and 5 will put a strain on infrastructure of water, sewer, power, schools, social services, police and fire, for example. o 1) Encourage development along major interstate systems; o 4) Expand supply of multi-family housing; and o 5) Encourage greater employment consistent with community character, sewer and water services. Economic growth and infrastructure must be considered in balance.</p>	<p>It is not wise to plan for no growth. Increased funds raised from new development will need to support more services and repairing existing capacity, while staying within nitrogen limits. The costs of sprawl have been well documented and is one of the reasons the regional POCD has identified growth areas that are consistent with minimizing fiscal investment in new infrastructure.</p>
<p>12/3/2019 Public Comment Period</p>	<p>Paragraph: Economic Development Summary Page 88 As to PFAS contamination, significant levels are found in purely residential areas without the influence of industrial or commercial activity in proximity or a catastrophic event. The PFAS standards for drinking water have yet to be established in Connecticut. This situation has the potential of costly remediation measures depending on what level the State permits in drinking water sources</p>	<p>Discussion added to page 89.</p>
<p>12/4/2019 Public Information Meeting- Verbal Summary</p>	<p>What's holding back solar and renewable development?</p>	<p>Addressed in pages 47-54. Discussed municipal, state and federal initiatives.</p>
<p>12/4/2019 Public Information Meeting- Verbal Summary</p>	<p>What is the level of detail in which riparian corridors are studied?</p>	<p>The tree canopy was measured within 50 feet of riparian corridors. The riparian tree coverage was then calculated by municipalities. The analysis can be found on page 30 of the plan.</p>
<p>12/4/2019 Public Information Meeting- Verbal Summary</p>	<p>Concerns of the 5G health impacts, what have we done to look at this? follow up. do we conduct our own public health tests. follow up: are everyday people included at all in our committee? follow up: are you looking at international studies, because they have much different standards?</p>	<p>A section and policies were added to the plan to address 5G at the request of the COG.</p>
<p>12/4/2019 Public Information Meeting- Verbal Summary</p>	<p>who pays for a regional water resilience system (dealing with drought)?</p>	<p>Water service providers build resilience infrastructure into individual customer rates.</p>

12/4/2019	Public Information Meeting- Verbal Summary	does the study look at air quality town by town?	No, there is only data available at the county and state level. See pages 101-102
12/4/2019	Public Information Meeting- Verbal Summary	What are solutions to dealing with increased population densities, as they stress systems and air quality.	This is a guiding trend for the Plan (see Introduction to Regionalism). The policies recommended in the plan work towards mitigating the negative impacts of population growth.
12/5/2019	Public Information Meeting- Verbal Summary	How do we incorporate technology into our POCD, lead to 5G concerns? What do we do to address those issues?	A section and policies were added to the plan to address 5G at the request of the COG.
12/5/2019	Public Information Meeting- Verbal Summary	How is transit, TOD, and transportation considered in the POCD?	Transportation is discussed in the Infrastructure chapter of the plan. Further details can be found in the SWRMPO and HVMPO Long Range Transportation Plans.
12/5/2019	Public Information Meeting- Verbal Summary	Where does funding come from to implement these projects?	It was discussed that the COG council directs COG staff on projects to research. The plan will be used to pursue grants and support the need for transportation planning funds.
12/5/2019	Public Information Meeting- Verbal Summary	Are trails and connectivity and access to open space and preserved lands considered?	Yes, see open space section starting on page 94 of the plan
12/5/2019	Public Information Meeting- Verbal Summary	What is the COG doing to address water issues?	Refer to the Water Supplies chapter starting on page 84
12/5/2019	Public Information Meeting- Verbal Summary	Concerns with sea level rise and local plans to address municipal investments along the coastline.	Refer to the Introduction section reviewing global scale trends guiding the decisions made for policies in the plan.
12/5/2019	Public Information Meeting- Verbal Summary	Concern with nitrogen levels in watercourses attributable to nonpoint sources that are adversely affecting the development plans for sewer service (Brookfield WPCF is the case in point).	The state is providing opportunities for funding to address nitrogen (nutrients) removal strategies.
12/5/2019	Public Information Meeting- Verbal Summary	Weston Open Space data needs to be updated.	Weston Open space data has been updated and table has been added to show acreage. Total town area includes waterbodies except for the long island sound.

<p>Public Information 12/5/2019 Meeting- Verbal Summary</p>	<p>Concern with community character and the impact of Section 8-30G standards for affordable housing on community character.</p>	<p>The plan does not explicitly discuss this issue, however many municipalities are addressing this by requiring all new developments to have for example 10% affordable housing. This brings market rate housing and affordable housing together. There is no inherent conflict between having affordable housing and protecting community character especially in Western CT where there is a high degree of emphasis on community specific design standards.</p>
<p>Public Information 12/5/2019 Meeting- Verbal Summary</p>	<p>Concern with overly restrictive CT DEEP regulations that place burdens on WPC facilities and economic development.</p>	<p>Included in new discussion on page 44.</p>
<p>Public Information 12/5/2019 Meeting- Verbal Summary</p>	<p>Concern with the health standards for cell phones under 5G deployment.</p>	<p>A section and policies were added to the plan to address 5G at the request of the COG.</p>
<p>Public Information 12/5/2019 Meeting- Verbal Summary</p>	<p>Concern with the Regional Plan being a static document and the need to make updates and implement its policies over the ten-year period after its adoption.</p>	<p>Council of Governments must update their plan at least every ten years. More importantly, by adopting the policies within the plan, WESTCOG is committed to developing strategies to implement these policies based on the policy priorities established by its governing body of chief elected officials.</p>
<p>Public Information 12/5/2019 Meeting- Verbal Summary</p>	<p>Concern with the role of the POCD as a vehicle to obtain grants, federal and/or state funding - whether at the regional or local level.</p>	<p>It was discussed that the COG council directs COG staff on projects to research. The plan will be used to pursue grants and support the need for transportation planning funds.</p>

<p>12/6/2019 Public Comment Period</p>	<p>It will be useful for WestCOG to declare the intention of their involvement in the next decade. Is the plan subject to undergo tweaks throughout the 20's? That is, will it be a living document or collect dust on the shelf?</p>	<p>The Regional Plan of Conservation and Development is intended to be a living document that establishes policy priorities reflective of the needs of its governing body - the chief elected officials of the region. While the policies contained in the plan are not expected to change over time, WestCOG will rely on its governing body and municipal input on periodically reviewing the policy priorities to be addressed in any given year. Where significant changes have occurred to the baseline conditions contained in the plan, WestCOGs governing body may choose to order the development addendums to the plan or policy papers to augment chapters of the plan that require reassessment.</p>
<p>12/6/2019 Public Comment Period</p>	<p>Some sort of mention of the sensitivity of population to major areas covered in the report. What will happen if the population increases or decreased by +/- 10% from what is projected. The trend has been for wealthy people to leave and immigrant families move in.</p>	<p>The plan focuses on the likely development scenarios anticipated over the next ten years based on population projections contained in the plan. WESTCOG routinely tracks population estimates by state and federal agencies to validate the population projections contained in the plan. Where significant populations discrepancies emerge over time, between the plan's forecasts and ongoing population estimates, WESTCOG must consider whether such discrepancies merit revisions to the plan or alternative strategies to address specific consequences created by changing population estimates.</p>
<p>12/6/2019 Public Comment Period</p>	<p>For Sewers, the EPA has mandated expensive remediation of Phosphorous at great cost to Publicly Owned Treatment Works. Danbury and Ridgefield are involved in expensive upgrades now. These are brought about, not by need, but by a shift in regulations. There is no mention in the report on the impact of regulatory change in this and other areas.</p>	<p>Addressed on page 44 to include phosphorus discharge discussion.</p>
<p>12/6/2019 Public Comment Period</p>	<p>For Water, there is action pending on the PFAS issue. The fiscal impact of regulatory change could be high and well beyond incrementalism suggested in the Plan. Again, it seems the impact of unexpected regulatory change could be highlighted, especially for water.</p>	<p>PFAS discussion expanded, see page 89.</p>

<p>12/6/2019 Public Comment Period</p>	<p>In the presentation last night, the slide for the area sewer coverage map was not accurate for Brookfield as it stands in 2019. It is on Page 46 of the DRAFT Plan. That may have been an old map from years ago. It may be the other WestCOG Towns need updated maps. The Sewer map for Brookfield is attached. It represents areas that are on or eligible to be on sewers. Most of the green area is on the current municipal sewer system.</p>	<p>The sewer service map contained in the plan was derived from CT DEEP's 2017 sewer service location areas.</p>
<p>12/6/2019 Public Comment Period</p>	<p>It was mentioned by Charles last night that nitrogen is the major pollution/nutrient culprit for Long Island Sound. The source mentioned was the Publicly Owned Treatment Works as a point source. But studies show that there is a strong influence of septic clusters as non-point a source of nitrogen. It could be mentioned that even managing point sources of nitrogen will not stop the introduction of nitrogen into area waterways.</p>	<p>we agree that non-point source or nitrogen are also contributing to the nutrient enrichment of Long Island Sound. While non-point sources are part of the problem, DEEP has focused on point sources since that is their primary regulatory responsibility.</p>
<p>12/6/2019 Public Comment Period</p>	<p>There is talk in the report of regionalization and cooperation where issues cross town boundaries. Some cooperation is already happening with the management of Candlewood Lake, for example. There are others, no doubt. The ongoing regional efforts should be recognized. More can be done with the Greenway initiatives.</p>	<p>Greenways section added to the plan and can be found on pages 95-96 of the plan</p>

12/19/2019 Public Comment Period

The Plan should, in appropriate sections, incorporate the concept and benefits of a direct rail connection of the Metro North Harlem Line in Southeast NY to the Danbury Train Station. The Further study of this concept was a recommendation of the 2019 Downtown Danbury Transit Oriented Development Study and, as you are aware, a Feasibility Study was approved and is now underway by the New York Metropolitan Transportation Council and Putnam County. The benefits of this connection area many, including but not limited to, reducing vehicular congestion on local roads and interstate highways and associated safety improvements, economic growth opportunities for downtown Danbury across land use sectors and consistent with infill and transit-oriented development policies, and the reduction of pollutants that result in the degradation of air quality. This Feasibility Study represents a significant multi-agency/multi state initiative and a time-sensitive recognition as the dramatic impacts that will materialize for the region by improving transportation options within the transit corridor. Said connection is also consistent with policies contained within local and regional planning documents including Danbury's POCD, the MPO's Plan, the Western CT Comprehensive Development Strategy, and the State's POCD.

We agree with the importance of this suggestion. However, the Regional POCD is not intended to replace the detailed analysis and policy guidance contained in the Long Range Transportation Plans that have already been adopted for Western Connecticut. The concerns raised are addressed in these plans and these plans represent a detailed "deep dive" into transportation policy issues that go far beyond the role of the regional plan of conservation and development which really is a document that integrates conservation, economic development, transportation, infrastructure, natural resources and housing into a coherent coordinated land use strategy.

12/19/2019 Public Comment Period

The Land Use and Potential Growth Area Map is not entirely consistent with the West Side District Plan in Danbury's current POCD. Danbury's POCD contains the following goal "Development of the West Side District as the major growth center in the City." A mix of uses is noted with growth needs to be managed and measures taken to protect exiting neighborhoods and the environment. Danbury acknowledges that the District plan map in the POCD was not updated in the 2013 amended Plan to reflect existing zoning changes, including the designation of more that 500 acres on the West Side to the Planned Neighborhood Development floating zone.

The Regional Plan of Conservation and Development reflects consistency with adopted municipal plans. When and if municipal plans are revised, the regional plan can review and consider whether such municipal policies and plans are consistent with the regional policies.

12/30/2019 Public Comment
Period

In Table 10 on page 44, the receiving water for the Danbury wastewater treatment plant is noted as being the "Seth Williams Brook." To the best of our knowledge, there is no Seth Williams Brook in Danbury. According to the DEEP website, the Seth Williams Brook is in Ledyard/Stonington. Per the City of Danbury Superintendent of Public Utilities, the City's permit notes that Limekiln Brook is the surface water body that receives the discharge from the Danbury wastewater treatment plant.

We agree. This is an error found in DEEP document and Seth Williams Brook has been replaced by Limekiln Brook.

Update table on page 44

1/2/2020 Public Comment Period

Incorporate Implementation Plan for Sustainable Development in the NY-CT Metropolitan Region, 2014: As written, WestCOG's draft POCD does not reference or contain recommendations from several recognized sources, perhaps most critically the Implementation Plan for Sustainable Development in the New York – Connecticut Metropolitan Region, 2014 created by the NY-CT Sustainable Communities Consortium a signed onto by the communities in the WestCOG region. This plan includes a Fair Housing and Equity Assessment (FHEA), which describes the context, data, and evidence for equity and opportunity in the region, and includes recommended strategies to inform decision making in the region. The FHEA defined distinct areas of racially- and ethnically concentrated poverty and places with high opportunity but little affordable housing. Based on the outcome of the FHEA, member communities, committed to actions to address regional equity and opportunity. We ask that WestCOG reference the Implementation Plan to inform the housing section of the Regional POCD to ensure that issues of equity and opportunity, already agreed to by many WestCOG member communities, are included in regional plan's recommendations. Some key recommendations to consider include: a. Adoption and enforcement of local mandatory inclusionary housing ordinances b. Preservation of affordable housing by local jurisdictions when affordability requirements are expiring; c. Investment in redevelopment of public housing to replace existing units with new housing in mixed-income settings while preserving or expanding the number of extremely low-income units; d. Increased access to job centers through strategic transportation investments by MPOs; and Development of and commitment to community engagement best practices.

The Regional Plan of Conservation and Development is not a housing assessment plan nor a housing equity plan. It does address housing issues including housing affordability, zoning incentives and disincentives and strategies for increasing the housing supply consistent with meeting the housing needs of all economic classes in the region. The 2014 Implementation Plan for Sustainable Development in the New York- Connecticut Metropolitan Region is no longer up to date and has been removed from the pertinent websites of those responsible for that document. The housing policies included in the regional plan provide realistic levels of commitment to addressing housing cost challenges faced by seniors and younger workers seeking to live within the region. The Regional Plan is based on an extensive and unprecedented level of analysis concerning inclusionary housing approach adopted in all 18 municipalities. The housing policies contained in the plan are a direct reflection of months of a detailed evaluation of the inclusionary zoning strategies in place in the 18 municipalities in Western CT. No other regional plan of conservation and development has undertaken such an inclusionary zoning analysis as found the WESTCOG plan.

1/2/2020 Public Comment Period

Include additional relevant data and analysis of housing need: WestCOG's draft POCD does not include or make use of available data or analyses on the inequities of the region's income distribution, racial segregation, demographics of in-migration, and housing cost burden as they relate to the region's housing needs, from respected sources including: United Way of Connecticut's ALICE Report and the Fairfield County Community Wellbeing Index. We feel that a more robust demographic and socioeconomic analysis that provides a baseline understanding of existing conditions with respect to these issues is an essential element of a regional plan, providing the data points necessary for informed policy and planning decision making. Further, we feel strongly that the plan should include a Housing Needs Assessment.

Housing Needs Assessments are not appropriate to include in a POCD. None of the other COGs include a HNA nor has either of the two past POCDs included one.

<p>1/2/2020 Public Comment Period</p>	<p>Recognize existing requirements for municipal housing plans: WestCOG's draft POCD does not include any reference to the state requirement found in CGS Sec. 8-30j that "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." It is imperative that the WestCOG regional POCD provide context for and guidance on preparation of mandated local affordable housing plans to assist member towns in meeting the affordable housing plan requirement as well as the required 10% affordability threshold, which is also mandated by State statute. As the housing market is regional and not confined to local municipal boundaries, a regional understanding of housing need, as noted above, is critical to addressing these State requirements.</p>	<p>The Regional Plan has been revised to address the requirements for municipal housing plans including providing guidance on the general topics that such plans should address.</p> <p>Section added on page 68-69 regarding Affordable Housing Plans. The Regional Plan has been revised to address the requirements for municipal housing plans including providing guidance on the general topics that such plans should address.</p>
<p>1/2/2020 Public Comment Period</p>	<p>Expand public comment process: WestCOG has an important responsibility to create public comment and information sessions that are accessible to all residents of the region, including low-moderate income citizens who rely on public transportation and may work second shift jobs. We appreciate that two public information meetings were held to provide the public with an opportunity to provide comments on the plan. But given that these sessions were held on consecutive nights at the same time of day (Dec. 4th & 5th, 7-8pm) in Greenwich and Redding, we are concerned about the accessibility of these meetings for residents of the WestCOG region's urban areas. We respectfully request that WestCOG consider hosting additional information sessions in the region's cities to ensure access for both urban and suburban residents. If the public comment period is not extended to include at least one meeting in at least one of the region's urban areas, such as Stamford or Danbury, the limited existing public comment process could fairly be construed as exclusionary, however unintentional that may be</p>	<p>WestCOG will hold a public hearing on the plan at its January 16, 2020 Council of Governments meeting in Ridgefield, CT at the Ridgefield Visiting Nurses Association. Public comments will be received at that meeting. The public can access copies of the draft plan on the WestCOG website site which makes the document far more accessible to the public than holding meetings beyond those already scheduled, that require transportation - wither by bus, train, or automobile. Comments submitted via email ensures that even those who are transportation disadvantaged will have access and ability to comment on the plan in a timely manner.</p>
<p>1/3/2020 Public Comment Period</p>	<p>The Norwalk River Valley Trail (NRVT) should be featured in the WestCOG POCD for three reasons: 1. The NRVT will run for thirty miles through five key municipalities within WestCOG; Norwalk, Wilton, Ridgefield, Redding and Danbury. 2. The NRVT will significantly contribute to a majority of the key categories in the POCD, including: Riparian Corridors, Transportation Infrastructure, Economic Development, Community Character and Tourism. 3. The NRVT's potential is proving out; its showcase trail in Wilton was voted the #1 amenity in Town and over 6,000 people per month are counted on the Trail in the CT Trail Census.</p>	<p>Greenways section added to the plan and can be found on pages 95-96 of the plan</p>

1/4/2020 Public Comment Period

I don't see any discussion on buses and/or trains in the POCD. Am I missing it ?

Transit is discussed in relation to housing and economic development. However, the plan defers to the Long Range Transportation plans for HVMPO and SWRMPO for transportation planning.

1/6/2020 Outside of Public Comment Period

Lack of data on how accessory apartments can be made more easily in a community and more specifics on local legislative/zoning challenges best practices - maybe laws mandated at the state level that local towns can use (see page 66) and rules to count toward affordable housing. - Without this option - (by default) Towns will need the expensive NEWLY BUILT developments (and life time of costs to upkeep because these units only break even/lose money every year) to meet affordable apartment quotas. - Local zoning changes and centralized landlord support for accessory apartments would help. AH benefit individual homeowners (affordability of homes) and lower quotas and impact on the character of CT Towns. In New Canaan - SEVEN (7) large housing projects like the one at Mill River in New Canaan have to be build - dramatically changing the character of the village. Please note: No one in New Canaan can tell me how much Mill River cost all-in i.e. land, lost tax revenue, cost to build - who owns the land now? The Town? The State? The Federal Government?, etc. -If this lack of transparency is multiplied by 7 more complexes in New Canaan and if other towns have this problem of understanding the financials for this type of housing - creating affordable housing could have a negative impact on both the financial health and transparency of operations for all towns meeting the quota. Also - does the Federal Government then own/control these complexes and the land in each town? - Further to this section - is Affordable Housing really necessary anymore in Fairfield County? The data appears to show that AH should be disbanded at least in Fairfield County. But no analysis is done in this report to show this. - There is a Lack of DATA on housing stock in the report and Changes in FAIRFIELD COUNTY. Garbage in - garbage out. The Plan doesn't reflect reality. - 10,000's of housing units have been built in last decade in Fairfield County - mostly in Norwalk and Stamford - and many sit empty. These are minutes from New Canaan - so there really isn't a dearth of housing options - for people who use vouchers to live affordably in any apt. Why should towns build more units - WHEN 1000s of apts sit empty in nearby towns? -We don't have a housing stock crisis anymore in most of Fairfield County but this

The amount of housing in the region is provided on page 61. We agree with the concerns about expanding housing opportunities through accessory apartments and other strategies that do not involve new construction initiatives. However, accessory apartments, by themselves will not completely solve the need for affordable housing in Western Connecticut. WestCOG has developed a technical appendix for the regional plan that will provide extensive data on existing housing conditions without encumbering the plan with unnecessary technical data that does not add policy value to the plan.

Section added on page 68-69 regarding Affordable Housing Plans

1/6/2020 Outside of Public Comment Period

A Plan cannot be created or Approved when the organizers and population don't know what they are dealing with. There is no data - current and future projections on the characteristics of the area. The underlying landscape of what the area has in terms of housing, open space, highways, traffic, population growth and characteristics of population, poverty levels, LIS, impact from surrounding areas - NYC, Westchester, etc. is not presented. - ONLY SELECTED DATA IS PRESENTED IN THE DRAFT REPORT - WHICH DRIVES A PARTICULAR VIEW POINT/AGENDA. -The Draft Plan is deeply FLAWED with "sins of omission" in the analysis and presentation on options. - Much more data to support the plan needs to be outlined - it's clear mistakes are already in this report - based on lack of understanding of the area thru empirical evidence and analysis. The plan is not matched up with reality so people can clearly see the need and the impact.

A 100+ page Technical Appendix with all of the tables collected for this plan will be released later this month (Jan 2020). A substantial amount of research went into this plan. In the plan there are 6 maps, 20 Tables and 28 Figures covering the categories you mentioned; in addition to summaries of the data in the text. In addition, the plan does contain population projections which are a fundamental baseline to all long term planning efforts to address traffic, open space, growth and economic development challenges. It is important to bear in mind that the regional plan addresses housing issues but is not intended to be a substitute for a detailed housing plan or a detailed housing needs assessment for the region. By state statute, Section 8-35a, regional plans of conservation and development are intended to address "development for its area of operation, showing its recommendations for the general use of the area including land use, housing, principal highways and freeways, bridges, airports, parks, playgrounds, recreational areas, schools, public institutions, public utilities and such other matters as, in the opinion of the agency, will be beneficial to the area." The Regional Plan is therefore a critical overarching document that provides general guidance from which more detailed technical studies can be developed to address the housing policy priorities of

1/9/2020 WCEDD Meeting

Concern raised with lack of reference to the arts in the POCD

The community character section has been updated and policies adjusted to address the role of the arts and culture as they impact community character and the economic vitality of the region.

1/9/2020 WCEDD Meeting

The Plan should assign responsibilities for implementing policies

The policies section (Appendix D) has been revised to provide an overview of responsibilities for implementing the major policies categories established by the plan.

1/9/2020 WCEDD Meeting

Health Care sector of the economy needs to be addressed

The Economic Development section of the plan already addresses this issue on page 70.

1/9/2020 WCEDD Meeting

Need to reference community health needs assessments and community health improvement plans in the POCD.

By state statute, Section 8-35a, regional plans of conservation and development are intended to address "development for its area of operation, showing its recommendations for the **general use** of the area including land use, housing, principal highways and freeways, bridges, airports, parks, playgrounds, recreational areas, schools, public institutions, public utilities and such other matters as, in the opinion of the agency, will be beneficial to the area." The Regional Plan is therefore a critical overarching document that provides **general guidance** from which more detailed technical studies can be developed to address the housing policy priorities of the region. For this reason, it is not appropriate to address community health needs assessments or community health improvement plans in the POCD.