Charles Geisler comments on "Rural Roots: Housing and Affordability" in Draft Comp Plan (March 10, 2022)

There are several well-done sections of the Draft Dryden 2045 Comp Plan. I have strong reservations about those parts of the Draft dealing with affordable housing, however. My comments follow, one general and several specific to the text.

General comment: Housing affordability, to which I and others in Dryden are committed, has fallen by the wayside in this Draft. It's here in name but not in substance. This is puzzling in light of early attention to it in our 2005 Comp Plan, yet more attention in the TC Housing Strategy of 2017 (adopted by the Town), and citizen comments advocating it in Dryden Planning Board and Steering Committee meetings for more than a year. It is further puzzling because one in four households in our Town pay 30% or more of their household income for housing while rural gentrification fans the problem even as it helps our tax base. Many Dryden citizens are sensitive to equality and diversity issues and want to see it reflected in our housing market options. Others have urged a marriage between long-term affordability and energy efficiency in housing; we have repeatedly provided source material on how and where this is being done.

Where the Draft does speak of affordable housing, it dwells on conventional homeownership (e.g., p. 37) to the exclusion of innovative (equity sharing) strategies, now operational in Tompkins County. Owning and renting options without equity-sharing alternatives are problematic, especially in overheated housing markets. They are often not sustainable and come with risks— foreclosures, abandonment, or exodus for people of limited means. Seeing affordable housing through only the lens of owning and fall-back rental markets is a transitory housing solution; a comprehensive plan looking ahead 2-3 decades must engage the causes of unaffordable housing and its community consequences—the loss of younger families, of valued workforce elements, and of the social diversity we claim to support.

Early in the Draft, under "Why Plan?" (p. 8) are the words "The Planning Board also sought to address contemporary planning issues and concerns specific to the town including affordable housing..." Really? Evidence for this is weak (see comments below). Readers of Dryden 2045 will see the new Comp Plan as DOA if the Draft isn't revised with vision, conviction, and accuracy.

Text comments: Text = delete. Red text = suggested revision

P. 42: "The Guiding Principle for this Section is focused on housing affordability through the maintenance of existing housing and the development of a diversified housing stock to support all residents now and in the future. To create a community of equity and inclusivity, the Town of Dryden should prioritize the availability of housing for all ages, abilities, lifestyle choices, and income levels, and it should do this by pursuing home ownership, rental, and equity-sharing opportunities. While the town is continuing to experience

residential growth, several types of housing remain significantly underrepresented within the current housing stock. Many neighboring communities are expanding their housing offerings, which ultimately creates challenges and opportunities to support existing residents and attract new residents. Some neighboring communities are expanding their housing offerings to include third sector housing via the Ithaca Neighborhood Housing Services (INHS)."

Note: The above assertion that "the town is continuing to experience residential growth..." may not be accurate. Town population fell from 14,435 in 2010 to 13,905 in 2020. In 2010 there were 6,371 housing units; but these data are not available yet for 2020. https://www.census.gov/quickfacts/fact/table/drydentowntompkinscountynewyork/RHI825219

P. 43 DRIVERS FOR PLANNING

"The town's existing neighborhoods provide the opportunity to integrate a variety of new housing types into the community to accommodate changing demands. The town should focus on housing that is affordable and accessible to seniors and older adults who wish to age in place to accommodate the town's relatively high proportion of older adults. Additionally, housing for younger families seeking new single-family housing close to schools, shopping, and transit should be prioritized. Equity-sharing units, increasingly popular thanks to the dedicated work of non-profit organizations in Tompkins County, are particularly relevant to younger households of limited means. Community members identified the lack of existing water and sewer infrastructure in many areas of the town and that such infrastructure is a critical need to implement the nodal development model that will encourage a range of housing types and supporting amenities, such as transit access.

"Identifying and supporting the maintenance and renovation of existing housing stock will further improve the functionality of existing housing units while accommodating in-demand housing types. Central to this functionality is reduced reliance on carbon-based energy and heating. Flexibility in housing choice and improved functionality of the existing housing stock would will help ensure that the town remains a welcoming community regardless of one's background or other socioeconomic factors.

"Some members of the community expressed concern that, through the current planning process, regulation may be a barrier for development in the Town of Dryden, hindering the ability to develop diversity in the housing types and increasing the overall cost of development. In addition to expanding housing choices, strategies should be taken to ensure that policies are streamlined, simplified, and implemented in a way that allows for flexibility where needed."

P. 44: Note: Are "parcels" in pie charts equivalent to "housing units" in Housing Census? If yes, why is Fig. 6 total 3,367 units rather than something close to 6371 housing units (the 2010 figure)? If the former number refers to residences surveyed and you explained this earlier, say it again.

Note: Manufactured housing is your term for mobile homes? If so, say this. In any case, there were over 800 mobile homes in Dryden's 14 mobile home parks in 2005 (see pg. 45) and 2019, and many more outside these parks. Where is your Fig. 6 number (306) from?

"Many of these homes are located within existing manufactured home parks. As a result, traditional methods of collecting data on residential properties in the town do not capture individual HUD/manufactured homes, making their impact on the town's housing market more difficult to assess and analyze.

Note: This above paragraph is illogical (see green text). Failure to capture (count?) individual/ HUD manufactured homes is not a function of them being in parks. Their impact on the town's housing market analysis, difficult though it is to assess, is not due to location in a park but, alas, to discrimination, stereotyping, and common fear of entering these premises.

P. 45: The median household income in the Town of Dryden is \$62,852, the highest of all comparative communities except the Village of Dryden which is located within the town.

Note: Dryden village was removed from the town in arriving at this median income, correct? Probably best not to use "communities" here—how about 'local jurisdictions'?

Note: Unintentionally, these paragraphs on income and education give a misleading picture of the town. High median income and high education attainment are characteristics of only parts of Dryden. Such a picture enables indifference as to the abiding need for affordable housing. Add line saying "These characteristics are unevenly distributed across Dryden and don't negate the need for urgent and proactive housing policy reform."

Note: Header at the top of page 45 is in accurate; no <u>trend</u> data shown here. If you have some, share it.

P. 48: "While the Town of Dryden has a lower cost of living compared to the adjacent areas to the west including the City Ithaca and Town of Lansing; property and school taxes are perceived to be high especially as much of the town lacks sewer and water service. The town is experiencing a demographic shift as its population ages

and there are not adequate options for senior housing within the town. Supporting data? At the same time the town has a limited housing supply which leads to higher costs and broad-spectrum affordability problems. The town should continue exploring ways to encourage a diversity of housing choices while preserving the rural setting within the town and reducing the tax burden of single-family residential development.

Note: This broad-brush claim (green) about sewer and water may be accurate but is not been established in the Draft thus far. Evidence? Public comments need substantiation.

P. 48: "Outcome RR 1.1: Continued development of underrepresented housing types":

Note: Make reference to alternatives to homeownership and renting (see General Comment, above). For example, mobile home park conversion to cooperative housing or equity-sharing land trust-style housing (as in Trumansburg) or INHS's community land-trust housing in Ithaca. Nodal home developments won't bring diversity to Dryden unless we promote a full range of tenure types. We are fortunate to have local expertise/experience and should acknowledge it.

"ACTION RR 1.1.2

Encourage compact, energy-saving development in nodal areas that increases the availability of affordable single and multi-family housing options.*"

"ACTION RR 1.1.3

Establish minimum requirements for affordability in new construction."

Note: Elaborate (green text). Too vague to be helpful as stated.

49: "GOAL RR 2 – SUPPORT INVESTMENT IN EXISTING HOUSING STOCK There are a range of housing conditions within the town; there is a general concern that housing conditions are deteriorating. The town could should continue to investigate programs available to homeowners interested in making improvements to their homes. Refurbishing of existing housing stock and education/outreach programs dedicated to this end would help to maintain affordability within the town."

"Outcome RR 2.1: Maintained use and desirability of existing housing and neighborhoods." ACTION RR 2.1.1

Develop partnerships and a centralized resource to assist property owners with nome structural and low/no carbon energy improvements.* ACTION RR 2.1.2

Conduct periodic (5-year) housing market studies to better understand affordable housing needs within the town.

ACTION RR 2.1.3

Support financial assistance for property maintenance and improvements using external grant funding and multi-sector subsidies.

ACTION RR 2.1.4

Proactively solicit proposals for shared equity housing in the villages, hamlets, mobile home parks, and rural areas of Dryden."

P. 49: Note: This page is inconclusive and puzzling. It is a list of aspirations and maybe's that commit the town to nothing. This summary of "actions" instills little hope that Dryden intends to tackle our housing affordability crisis, much less be a leader in it. It makes virtually no mention of opportunities to marry housing and energy reform, about which several of us spoke and submitted written documentation/resources on multiple occasions. Even allowing for errors in the Dryden's 2019 housing quality study, our town is "housing-challenged." Dryden is losing people, its most valuable resource, perhaps so many can't afford permanent housing here. We are simply not making progress on the affordable housing front (e.g., pg. 76, below). Fixing the problem starts with fixing this Draft.

P. 76: "Population loss in the Village of Freeville stands in contrast to the goals established by the Town of Dryden to encourage growth in an around established village and hamlet centers (U.S. Census Bureau, 2020). The trend loss also stands in contrast with the Tompkins County 2017 Housing Strategy which identified the Village of Freeville as a Rural Center and projected the need to develop 30 units of affordable housing in the Village annually until 2025 (Tompkins County, 2017)."

Note: two data points are not really a trend.

94: Section 6 should explicitly list the connection between affordable housing and energy opportunities (please see my earlier submissions to you). It's conspicuously absent here.

116-119: NODAL CORRIDOR

"The Nodal Corridor Place Type, identified as dark pink on the FLUM, applies to locations within the town identified along NYS Route 13, NYS Route 366, and Freeville Road where new, mixed-use development is strongly encouraged. These areas are well positioned for public infrastructure that would support existing centers, including the hamlet of Varna and Villages of Dryden and Freeville, employment, public amenities, commercial, and housing near existing multimodal corridors that are viable for public transit, biking, and walking. Complementary and mix of commercial uses should be encouraged to develop strong centers and active streets."

Note: The positioning of Nodal Corridors will be a boon to new developments and to developers. They are precisely the locations, favored by access to sewer, water, transportation and services, where the Town can negotiate set-asides with developers, not only for open space amenities, but for long-term affordable housing units of diverse tenure kinds.