HADDAM INCENTIVE HOUSING ZONE STUDY REPORT

May 2015

Prepared for:

Haddam Planning and Zoning Commission

Prepared by:



Introduction

The Haddam Planning and Zoning Commission obtained a Technical Assistance grant from the Connecticut Department of Housing to study the feasibility of establishing Incentive Housing Zone(s) (IHZ) in Haddam. The Commission engaged Milone & MacBroom, Inc. to assist in technical analysis of the need for affordable housing in the community, identifying potential locations for incentive housing zones, and exploring the potential for those locations to accommodate incentive housing developments. This report summarizes the feasibility analysis process and results.

Report Summary

The State established the Housing for Economic Growth program in 2007 to encourage municipalities to make progress towards the State's goal of at least 10% of housing units in each community being designated affordable through proper planning and zoning. Affordable, according to the Statute, means generally affordable to 80% of median income. An examination of Haddam's current housing stock revealed that less than 1.5% of units are designated affordable. Furthermore, less than 10% of the Town's housing stock is renter-occupied, indicating a lack in diversity of housing type. This lack in diversity and price points has important negative implications for Haddam's ability to meet the housing needs of families who want to locate in town, but cannot afford to. Also, as Haddam's population continues to age, more households seeking to downsize will be forced to leave town due to a dearth of appropriate housing stock.

While the need for affordable units is strong in Haddam, this study shows that the densities required to meet the standards of an IHZ, per the Housing for Economic Growth program, are very difficult to achieve in Haddam due to a lack of public water and sewer, and limited suitable siting options. Therefore, the Commission decided to pursue other means of adding diversity to the Town's housing stock. This study offers several examples of such housing and the Planning & Zoning Commission is continuing to work on a floating or overlay zoning regulation to enable such housing where it is suitable, around village centers and major transportation corridors, without affecting landowners' ability to develop their properties as currently zoned.

Affordable Housing

The 2013 Housing Data Profile for Haddam prepared by the Partnership for Strong Communities is on the following pages. The profile provides a detailed look at Haddam's current housing stock: by type, tenure household and other characteristics. Following is a summary of the key points (with data supplementation as noted).

Why Affordable Housing in Haddam?

1.26% of Haddam's housing stock meets the statutory definition of affordable (2013 numbers). The town ranks 117th out of 138 municipalities not exempt from *Connecticut General Statutes* §8-30g. The statute established the affordable housing land use appeals decision law that enables developers to challenge denials of proposed affordable housing development in municipalities with less than 10% affordable housing in their communities in Superior Court, and place the onus on the municipality to prove the negative impacts on the health, safety and welfare of the community that the development would pose.

90.7% of Haddam's housing stock is owner-occupied. The 2014 median sales price for a home in Haddam is \$277,000 (Warren Group). This means that more than half of all housing sales in 2014 were

out of reach for those earning less than \$64,000 per year-assuming 20% down-payments and conventional loans. Moreover, the ability to save \$55,000 to make a 20% down-payment on a median sales price home can be difficult for those earning less than \$64,000 per year.

While there are few rental units available (approximately 300), they tend to be relatively affordable. The median gross rent for Haddam's approximate 300 rental units was \$905. The median selected monthly owner cost for housing units with a mortgage was \$2,315. By contrast, the median gross rent for Middlesex County was \$1,005, and the median selected monthly owner cost for mortgaged units was \$2,132. Very few rental units appear to carry the burden of providing readily affordable housing in Haddam.

Affordable Housing for Whom?

Younger professionals seeking to live in Haddam have limited rental choices, if they are not ready to purchase a home due to student loan burden, insufficient savings for down payments and/or not desirous of homeownership and the lifestyle it entails.

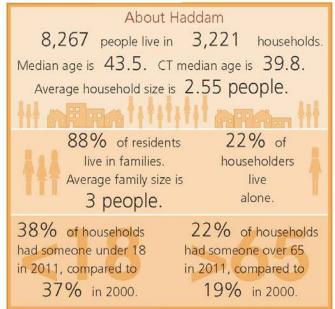
Haddam also has an aging population (median age is 42.1 compared to 40.0 for the State and 43.0 for Middlesex County – ACS 2008-12). 55% of occupied housing units in Haddam have been occupied by the same householder for at least 15 years. Older householders on fixed incomes may be preparing to downsize but have limited options to downsize within Haddam.

What Does Affordable Mean in Haddam?

According to the parameters of the IHZ program, affordability is based on an adjusted median income that ranges from \$44,750 for a single person to \$63,900 for a family of four. Assuming 20% down, \$900 to \$1,000 annual insurance and a 30-year fixed mortgage at 4% interest, these incomes translate to affordable house prices of \$187,000 for a single person to \$270,000 for a family of four. For Haddam renters, monthly rents ranging from \$1,200 to \$1,600 for one-to-four person households are affordable under the parameters of the IHZ law

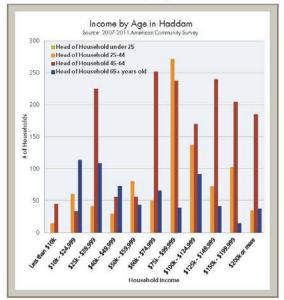


Population & Households

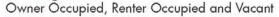


Source: 2007-11 American Community Survey, 2000 Census

Household Income by Age



Housing Units





About 67% of the state's housing units are owner occupied, with higher rates of owner occupancy in suburban areas and higher rates of rental housing in the state's urban areas.

Median Household Income

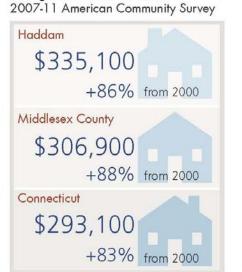
Source: 2007-11 ACS	Haddam	Middlesex County	СТ
100% of Median	\$87,883	\$77,095	\$69,243
80% of Median	\$70,306	\$61,676	\$55,394
50% of Median	\$43,942	\$38,548	\$34,622
30% of Median	\$26,365	\$23,129	\$20,773

PARTNERSHIP FOR STRONG COMMUNITIES

WWW.PSCHOUSING.ORG

Housing Data Profile

Median Home Values Change from 2000 Census to



Changing Home Values

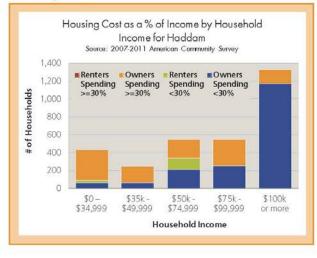
By comparing home values as reported in the 2000 Census to home values in the 2007-2011 ACS, one can see that homes under \$200,000 are becoming scarce.



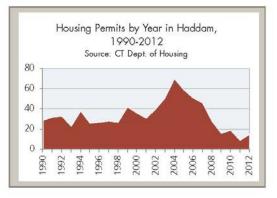
Housing Permits

The number of housing permits issued each year indicates the level of housing construction. Connecticut has consistently ranked near the bottom in housing permits per capita when compared to other states, averaging 50th from 2003-2012 out of the 50 states and Washington D.C.

Housing Costs



PARTNERSHIP FOR STRONG COMMUNITIES



The Housing Wage



Each year, the National Low Income Housing Coalition calculates the "housing wage," the amount needed for a household to afford a typical 2-bedroom

apartment in metro areas throughout the United States. Connecticut's housing costs are typically high, ranking #8 in 2013 with a housing wage of \$23.22.

WWW.PSCHOUSING.ORG

Housing Data Profile

Rental Units by Gross Rent 50% Haddam's 262 rental units have a gross rent over \$1,000 per month, according to 2007-11 American Community Survey data. 19% have a gross rent under \$750 per month. 35% Haddam 30% Middlesex County Units 25% Connecticut **Percent of Renta** 20% 15% 10% 5% 0% 51,00051289 \$125051,899 5150-5999 Rent Amount

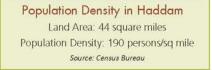
Affordable Units in Haddam Each year the CT Department Of Housing surveys municipalities in the state to determine the number of affordable units each has. The data is compiled for the Affordable Housing Appeals List. The following housing units are counted as affordable for Haddam in 2012: 22 Governmentally Assisted Units Tenant Rental Assistance 1 15 CHFA/USDA Mortgages O Deed Restricted Units 38 Total Assisted Units 3.504 Total Units, 2010 Census ÷ 1.1% Units Assisted =

An Aging Population

Connecticut's population is older than the rest of the nation, with a median age of 40.4 compared to 37.4 for the nation. Many of CT's town also have an aging population, which, if trends continue as they are, will translate into fewer children in 2015, 2020 and 2025.

In particular, the population of school aged children is projected to drop significantly in many towns over the next two decades, while the 65+ population will rise.

PARTNERSHIP FOR STRONG COMMUNITIES



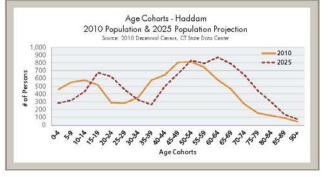
United Way 2-1-1 Top 5 Housing-Related Requests for Service for Haddam

Calls into the United Way's 2-1-1 Infoline are one indication of the housing needs in Connecticut's communities. CT residents call 2-1-1 to get connected to various services, as seen in this table:

	Type of Request	2012	2011
1.	Housing Search and Information	11	8
2.	Homeless Shelter	4	3
3.	Mortgage Delinquency and Default Counseling	2	3
4.	Section 8 Housing Choice Vouchers	2	0
5.	Rent Payment Assistance	1	1

Renter Households in Haddam





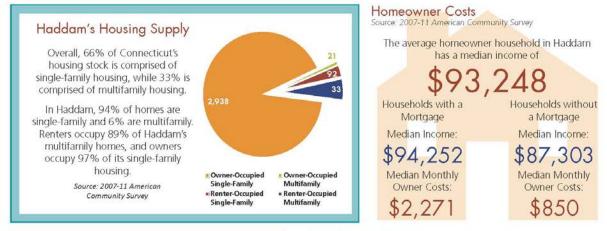
WWW.PSCHOUSING.ORG

ofile

HADDAM INCENTIVE HOUSING ZONE STUDY MAY 2015

Housing Data Profile

Haddam

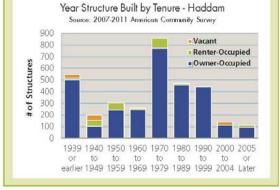


Age of Housing Stock

Connecticut's housing stock varies in age, with 23% built before 1939, half built from 1940 to 1979 and 27% built in 1980 and later.

In Haddam, 16% of the housing stock was built prior to 1939, 49% was built between 1940 and 1979 and the remaining 35% was built after 1979.

Source: 2007-11 American Community Survey



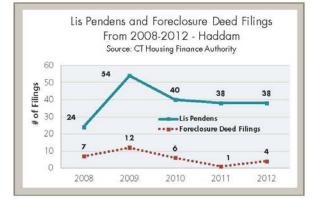
How Many Bedrooms?

A majority of homes in Connecticut have 3 or more bedrooms, with 37% having 3 bedrooms and 21% having 4 or more. 42% of the homes in the state have 2 or fewer bedrooms.

Over 74% of homes in Haddam have 3 or more bedrooms, while 26% have 2 or fewer bedrooms. Towns and cities that have larger homes with more bedrooms offer fewer housing options for younger workers or downsizing Baby Boomers.

Foreclosure Activity

Foreclosure activity in Connecticut is heavily concentrated in more urban areas, with eight communities (Bridgeport, Bristol, Hartford, Meriden, New Britain, New Haven, Norwich, Waterbury) accounting for 39% of foreclosure deed filings and 32% of lis pendens.





FOR MORE INFORMATION: DAVID FINK, POLICY DIRECTOR, DAVID@PSCHOUSING.ORG, 860-244-0066.

PARTNERSHIP FOR STRONG COMMUNITIES

WWW.PSCHOUSING.ORG

IHZ Program Overview

Incentive Housing Zones (IHZ) are overlay zones that enable Incentive Housing Developments (IHD) by *right*. IHZs must be approved by the Connecticut Department of Housing and meet several statutory requirements in order to be eligible for financial incentive payments to the municipality. An IHD is a residential or mixed-use development in which at least 20% of the dwelling units are guaranteed affordable to households earning 80% or less of the Area Median Income (adjusted for household size) for at least 30 years.

The incentives are payments from the State for municipalities that create IHZs in appropriate locations: near transit facilities, an area of concentrated development or an area because of existing, planned or proposed infrastructure that is suitable for an IHD.

FY 2014 Income Limit	Median Income	FY 2014 Income Limit	Persons in Family								
Area		Category	1	2	3	4	5	6	7	8	
Haddam town	\$85,700	Very Low (50%) Income Limits (\$) Extremely	30,000	34,300	38,600	42,850	46,300	49,750	53,150	56,600	
		Low (30%) Income Limits (\$)*	18,000	20,600	23,150	25,700	27,910	31,970	36,030	40,090	
		Low (80%) Income Limits (\$)	44,750	51,150	57,550	63,900	69,050	74,150	79,250	84,350	

2014 Area Median Income for Haddam

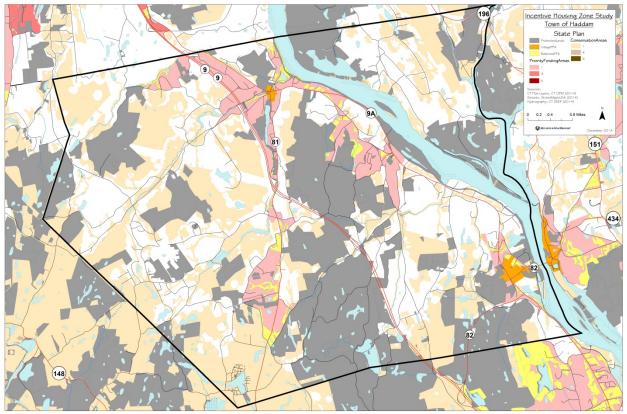
Source: HUD (huduser.org)

The targeted affordable mortgage or monthly rental costs for singles and couples in Haddam, per the IHZ program, would need to be \$1,119 to \$1,279 (30% of income for low income one- and two-person family households). Affordable mortgages and/ or rental rates for families of 3 or 4 would need to be \$1,439 to \$1,598 per month (30% of income for low-income three- and four-person households). Other affordable rentals and ownership costs can be calculated from the above income limits table.

IHZ Requirements

Following are requirements of the Connecticut Incentive Housing Zone program for IHZs with commentary on the applicability to Haddam:

I. Be consistent with the State Plan of Conservation and Development (eligible growth location)



IHZs should be located in priority funding or balanced growth areas. These areas in Haddam are shown in pink, yellow and orange in the map above. They are concentrated along the Routes 81 and 154 corridors, along Walkley Hill Rd, and in Higganum Village and Tylerville.

- 2. Regulations of the zone shall permit, as of right, incentive housing development
- 3. Zone must comply with minimum allowable density requirements
 - 6 units/acre for single-family housing
 - 10 units/acre for duplex or townhouse housing
 - 20 units/acre for multifamily housing
 - DOH may waive density requirements for land "owned or controlled" by a municipality, land trust, housing trust fund, or non-profit housing agency, provided development will be 100% set aside at 80% of AMI
- 4. Minimum as of right density allowed by the zone must increase the density allowed by the underlying zone by at least 25%

The majority of Haddam is zoned residential one or two acre. Commercial and Village districts allow 10 multi-family units per acre as part of mixed-use developments. To meet the minimum densities outlined above will require at least a 25% increase in underlying zoning (assuming multi-family style housing in commercial and village zones).

5. Minimum densities prescribed above shall be subject only to site plan or subdivision procedures, and shall not be subject to special permit or special exception procedures, requirements or standards

- 6. IHZ may consist of one or more sub-zones
- 7. IHZ land area may not exceed 10% of the total land area or aggregate area comprised of IHZ and sub-zones in a municipality may not exceed 25%

Other Zone Considerations

- In order to support the requirements of the IHZ, the zoning commission may modify, waive or delete dimensional standards contained in the zones that underlie the IHZ
- The regulations of an IHZ may allow for a mix of business, commercial or other nonresidential uses provided that these uses comply with the requirements of the Statute, and are consistent with the density requirements
- An IHZ may overlay all or any part of an existing historic district or districts
- An applicant for site plan or subdivision approval may exceed the minimum requirements of the IHZ
- A zoning commission, at the time of its adoption of regulations for an IHZ, may adopt design standards for the IHD
- In determining buildable area, wetlands or watercourses and areas exceeding one-half or more acres of contiguous land where steep slopes or other topographic features make it unsuitable for development should be excluded.

Additional Funding Available

Phase II Pre-Development Funding of up to \$50,000 is available through a grant application process. These funds are intended to further a specific incentive housing development project and can be used for things such as planning and design costs, costs associated with land purchases, permitting, etc. This funding is available to municipalities, but may be passed through to a developer who has entered into an agreement with a municipality to construct an incentive housing development.

Zone Adoption Grant – the Department of Housing may make a payment of up to \$50,000 for adoption of an IHZ, subject to the availability of funds.

Building Permit Grants – The Department of Housing may make payments of up to \$2,000 for each multi-family, duplex or townhouse unit permitted, and up to \$5,000 for each single-family unit permitted in an approved IHZ, subject to availability of funds.

Source: CT Dept. of Housing (<u>http://www.ct.gov/doh/cwp/</u>)

Preliminary Site Selection

Initial site selection criteria targeted properties identified by the Planning & Zoning Commission and/ or Town Planner due to site disposition, previous approvals, and other known issues. The consultant expanded the initial list based on the purpose, intent and parameters of the IHZ program and a field survey. Following is a map and matrix of the sites initially considered. The matrix facilitated discussion with the Planning & Zoning Commission. The rankings are those of the consultant alone, and may be altered.

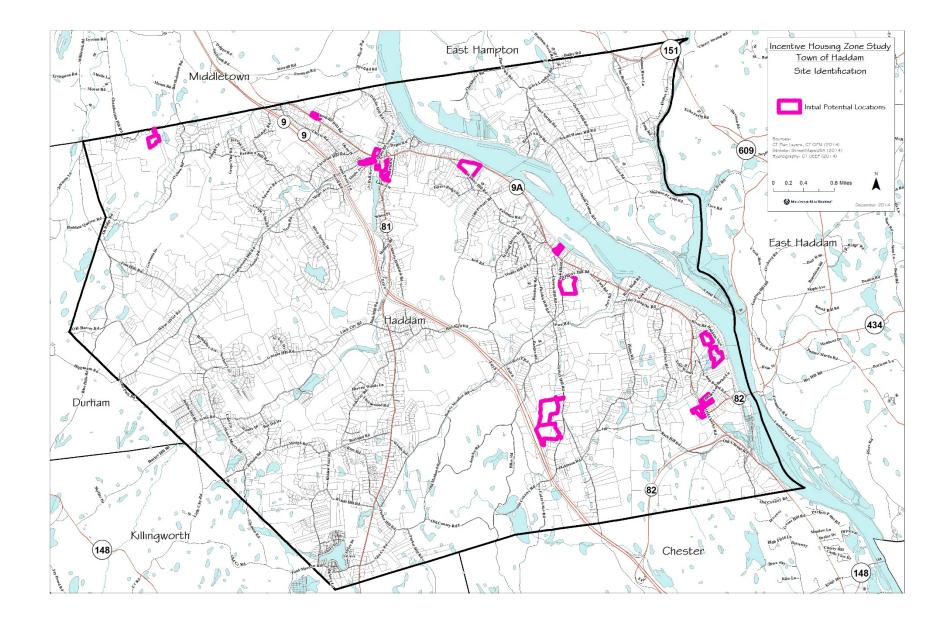
Factors the Commission considered:

- Bearing in mind the minimum densities required, how many overall new dwelling units does the Commission, community and potential affordable housing developers think the Town can absorb in one development? Some of the initial potential sites were quite large and would therefore have to yield significant units under IHZ requirements.
- What style of IHZ housing? The Town already has a large stock of single-family detached, and 73% of all housing units have three or more bedrooms. Is the IHZ also an opportunity to add diversity to the market-rate housing stock? Some of the potential sites would only make sense as single-family detached style developments.
- The purpose and intent of the program would steer IHZs towards Village Centers as areas with existing concentrated development, good transportation access, and the best potential for future public infrastructure (water and sewer). IHZs can be mixed-use and therefore be economic development generators as well.

The Commission discussed the merits and potential of each property at a meeting in January 2015, and narrowed the initial list down to five potential IHZ sites for further investigation. Those sites were:

- 48 Killingworth Rd.
- Brookes Court
- 23/27 Killingworth Rd.
- 82/ 92 Saybrook Rd.
- 300/ 305 Saybrook Rd.

Due to a variety of factors, including location, current zoning, and the willingness of current property owners among others, the Commission asked the consultant to prepare conceptual development plans for 48 Killingworth Rd and 300/ 305 Saybrook Rd. Following review of initial conceptual plans, the Commission discussed other means to encourage more dense, diverse and affordable housing units, such as overlay or floating zones that are similar to an IHZ, but with less density required. Additional conceptual plans were prepared, including for an additional site, to better understand the potential for such alternative regulations.



Potential Site	Acres	Current Zoning	Ownership	Current Land Use	Adjacent Land Uses	Physical Features	State Plan Designation	Proximity to Concentrated Development	Proximity to Transpor- tation Facilities	Potential Public Facilities	Potential Unit Yield	Other Notes	Overall Ranking
300/ 305 Saybrook Rd	4.67	C-I Village District	Private	Former industrial	School, commercial	Prominent village center site, previously built out site	Village Priority Funding Area	Good	Good - State road access	Potential village sewer service area	Moderate (multi-family as part of mixed-use)		Good
48 Killingworth Rd and adjacent parcel	9.70	R-I	Private (common ownership)	Single-family residential	Commercial and residential/ adjacent to Higganum Village	Rolling meadow and woodland	Priority Funding	Fair	Good - State road access	Adiacent to	Moderate (could be sub-zoned for both single-family detached and multi-family as part of mixed-use and/or single-family attached)		Good
1583 Saybrook Rd	4.27	C-1	Private	Commercial in historic structure	Commercial, vacant	Steep slopes to rear of property, adjacent 6 acre vacant parcel also limited by slopes	Village Priority Funding Area	Good	Good - State road access	Potential for public water	Moderate (multi-family part of mixed use, or single-family attached)		Good
23/27 Killingworth Rd	1.14	C-I Village District	Private (common ownership)	Vacant and vacant commercial	Commercial, cemetery and protected land	Previously developed	Village Priority Funding Area	Good	Good - State road access	Potential village sewer service area	Low (multi-family as part of mixed-use)		Good
Brookes Ct/ 1572/1564 Saybrook Rd	8.66	Ind/ C-I	Private (common ownership)	Vacant, residential and industrial/ Commercial	Industrial/ Assisted Living	Approved industrial subdivision with existing cul de sac	Village Priority Funding Area	Good	Good - State road access	Potential water	Moderate to High (multi-family as part of mixed-use and/or single-family attached - potential for subzones)	May prefer industrial use	Good
Rutty Ferry Rd	25.24	R-2A	Private	Former sand mine	Residential, public utility	Back portion wet, flat former mining site	Conservation on much of the back piece due to water, undesignated on the front piece	Fair	Poor - rural road	None	Moderate (single-family detached)		Fair

Potential Site	Acres	Current Zoning	Ownership	Current Land Use	Adjacent Land Uses	Physical Features	State Plan Designation	Proximity to Concentrated Development	Proximity to Transpor- tation Facilities	Potential Public Facilities	Potential Unit Yield	Other Notes	Overall Ranking
916/ 920 Saybrook Rd	4.03	R-2A	Public	Library and single- family	Low density residential, highway	Library use along frontage	Priority Funding Area	Poor	Good - State road access	None	Low (single-family attached or detached)	Site control potential benefit	Fair
565 Saybrook Rd	21.50	R-2A	Private	Single-family residential	Low-density residential	Some topography	Priority Funding or Balanced Growth	Poor	Good - State road access	None	Moderate (single-family detached)		Fair
I I Candlewood Hill Rd	4.00	R-I	Public (State of CT)	Garage/Office/ Warehouse	Low density residential, firehouse, Town Green	Prominent village center site, current CT DOT use	Priority Funding or Balanced Growth	Good	Good - State road access	Potential village sewer service area	Moderate (multi-family as part of overall mixed-use development)	Historic Scovil structures not conducive to residential, may have potential for residential infill	Fair
82/92 Saybrook Rd	6.03	C-1	Private	Veterinary Clinic, Union Hall	Low density residential, commercial	Previously developed, level	Undesignated, Conservation along 154	Poor	Good - State road access	None	Moderate (single-family detached)		Fair
215 Chamberlain Hill Rd	10.58	R-2A	Private	Cul de sac in for approved elderly housing development	Low density residential	Level, cul de sac in	Undesignated, some Conservation	Poor	Poor - rural road accessed through Middletown	None	Moderate (single-family detached)		Poor
61 Cedar Lake Rd	72.06	R-2A	Private	Sand Mine	Low density residential, highway	Remains of mining operations, watercourse	Undesignated, Conservation area around watercourse	Poor	Poor - rural road	None	High (single-family detached)		Poor

Conceptual Plans

Each property under consideration faced its own set of challenges; however, the overarching difficulty with attempting to site an Incentive Housing Development that meets the densities required by the Housing for Economic Growth program is the lack of public water and sewer service in Haddam. Having to site septic and well fields, with required separation distances, and achieve a suitable layout of dwelling units is very challenging. Moreover, the densities required by the IHZ program on parcels of any size require a community septic system of greater than 5,000 gallons per day, which requires a more complicated and expensive permitting process that most developers try to avoid. The following summarizes the conceptual plans developed as part of this study process.

48 Killingworth Rd.



Property: 9.1 acres Current Zoning: R-1 Buildable Area: 4.6 acres Development Concept A: 26 Townhome style units

Considerations: Would require DEEP permit for community septic; does not achieve required density for buildable area per IHZ program; difficult to site sufficient septic and well areas, parking and circulation and units.



Development Concept B: 28 – 50 Units (dependent upon unit configuration of buildings)

Parking: 72 spaces shown

Considerations: Would require DEEP permit for community septic; could achieve required density for buildable area per IHZ program if all one bedroom units; difficult to site sufficient septic and well areas, parking and circulation and units.

Flexible Building Block Design



Stackable One-Bedroom Units – 4 per Building Block

Three-Bedroom Units – 2 per Building Block

300/305 Saybrook Rd.



Property: 5.2 acres

Buildable Area: 4 acres

Current Zoning: Higganum Village

Development Concept: 80 residential units, 20,000 sq ft commercial

Parking: 200 spaces

Considerations: Insufficient room for well and septic areas; Sewer and water service required to achieve this development

323 Saybrook Rd.



Property: 1.5 acres

Buildable Area: I acre

Current Zoning: Higganum Village

Development Concept: One mixed-use building (2,700 sq ft commercial with 3 residential units above), 9-19 total residential units, depending on the building configuration

Parking: 28 spaces

Considerations: Due to the stream along western property line, septic and well locations may deduct further from the buildable area The process of working up conceptual development plans highlighted that the constraints to achieving greater housing density, and therefore more diversity in Haddam's housing stock, are the lack of public sewer and water. Developers will be limited by this physical constraint, in addition to the fiscal constraint of DEEP-permitted septic systems, regardless of the regulatory approach the Planning & Zoning Commission may take to encourage greater density and more affordable housing. A maximum allowable density of 10 units per acre for multi-family or townhome/duplex appears to be reasonably flexible to enable greater density and is consistent with the greater density the Commission has already enabled in the Higganum Village District.

In order to understand the different regulatory techniques to encourage more affordable housing and diversity in housing stock available to the Commission and their potential results, the Planning & Zoning Commission reviewed the following examples of built projects and the regulations that enabled them.

Olde Oak Village – Wallingford, CT

- > Mixed-income, 80 units, single-family detached
- > 6 Units per acre
- > Typical Unit 3 bedrooms, 1,450 sq ft
- Housing Opportunity District





PARTNERSHIP FOR STRONG COMMUNITIES 860.244.0066 WWW.PSCHOUSING.ORG

Apple Way – Madison, CT

- > Mixed-income, 17 units, single-family detached
- 6 Units per acre
- Typical Unit 2 bedrooms, ranging from 1,130 to 1,500 sq ft
- > Affordable Housing District Floating Zone



0.0

Old Farms Crossing – Avon, CT

- Low-income, 45 units, attached townhomes
- > 10 Units per acre
- Typical unit: 2 Bedroom; 1,080 sq ft
- Multiple Dwelling Development District

10 units per acre – townhouses or duplexes





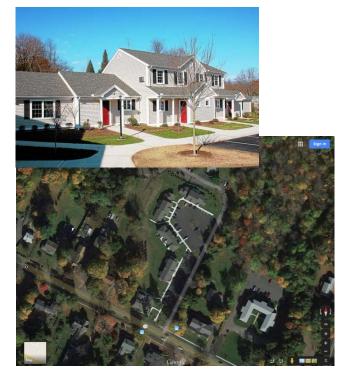






Foote Commons – Cheshire, CT

- Low-income, 20 units, multi-family
- > 7 Units per acre
- Studio and I bedrooms ranging from 800 to 1,200 sq ft
- Affordable Housing District Floating Zone



Westwood II – Farmington, CT

- Low-income, 34 units, multi-family
- > 20 Units per acre
- Typical unit: 2 bedroom; 1,050 sq ft
- Affordable Housing District Floating Zone

Westwood II, Farmington 34 units on 1.68 acres = 20.24 units per acre





WWW.PSCHOUSING.ORG

Regulations

As a result of this study and analysis, the Planning & Zoning Commission is working with its land use attorney to develop a floating or overlay zone to encourage affordable and more dense housing in these locations in and around Higganum Village.

Conclusion

The Planning and Zoning Commission identified a need for greater diversity in its housing stock, which primarily consists of single-family detached units, and limited opportunities for younger householders who frequently have student loan debt and minimal savings, as well as older householders on fixed incomes. Several potential sites for Incentive Housing Zones were identified and explored. A team of planners, civil engineers and landscape architects analyzed three sites for development potential, and found the densities required by the IHZ program difficult to achieve without public water and sewer service. However, in keeping with the spirit of the IHZ program, the Commission continues to pursue regulatory approaches to encouraging greater housing density, more attached and/or multi-family as well as affordable units in appropriate locations.