



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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October 19, 2018

Ms. Jane Weidman, AICP
Town Planner
4540 South County Trail
Charlestown, RI 02813

Subject: Draft Comprehensive Plan Review – Housing Chapter

Dear Ms. Weidman,

Statewide Planning greatly appreciates the opportunity to work with our municipal partners in the drafting of community comprehensive plans. We believe that the more closely we can work together, the better the ultimate product. We are pleased to notify you that our office has completed its review of the draft Housing chapter of the Charlestown Comprehensive Plan.

As with other draft material you have provided to us, this chapter is clear and well-written; it gives a good overview of the existing housing context in Charlestown. We note that there were no items of concern that could be an impediment to State approval identified in this chapter. However, there were some suggestions provided during the review that we would like to forward for your consideration. In addition to the comments outlined below, we have included (as an attachment) comments and suggestions submitted to us by Rhode Island Housing.

I would like to be clear that while the following recommendations do not equate to required changes, inclusion of recommended changes would likely benefit the ability of the community to implement this chapter as Charlestown moves forward.

Comment 1: The chapter includes a significant amount of housing data in tabular format. It may be helpful to include one or more graphs to display some trends over time, for example, the number of housing units created.

Comment 2: While the Town does not anticipate major demographic shifts, the plan could be enhanced by including a discussion on the adequacy of the available range of housing sizes and/or types in accommodating future population needs.

Comment 3: There is a small discrepancy in the total number of housing units reported on page 3. "Total housing units" is reported as 4,905 whereas the "Total unit distribution" adds up to 4,940 units.

Comment 4: On page 8, the chapter notes that although Charlestown has not achieved to 10% affordable housing threshold, the local housing market provides for "practical affordability" of housing that falls outside of the RI Low and Moderate-Income Housing Act. While practical affordability is a goal each community should strive for to ensure there are diverse housing options available for all income brackets, housing markets can change rapidly, affecting continued affordability. One of the reasons for requiring Low-Mod income housing to have a minimum 30-year affordability restriction is to ensure the availability of affordable housing regardless of market fluctuations.

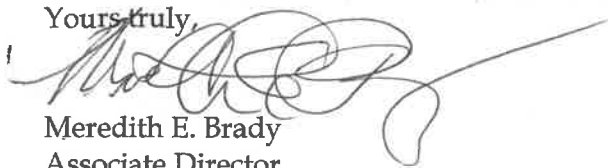
Comment 5: In 2004, Charlestown had adopted eight housing strategies to help move the Town toward meeting its 10% goal. Beginning on page 12, in the section "Effectiveness of Affordable Housing Strategies (2004 Affordable Housing Plan)," the chapter discusses the status of each strategy and next steps. Given the limited success of most of these strategies, we recommend that given past experience, the comprehensive plan provide a discussion of the reasons why each strategy is likely to be effective going forward, and, where needed, include corrective adjustments to strengthen those strategies to produce the desired results.

Comment 6: It has been noted that there is an Affordable Housing Commission webpage on the Town's site. The Commission was not discussed in the Chapter and we remain curious as to its status, effectiveness, and future role in the community.

In this review, we have attempted to identify any approvability issues regarding the material provided but there are some items, such as requirements related to the plan's internal consistency and completeness, which cannot be evaluated until a full draft is furnished. At the appropriate time, we encourage the Town to provide us with the full final draft for review.

As always, please feel free to contact Kevin Nelson, Supervising Planner with any questions, concerns, or requests that you may have at 222-2093 or at kevin.nelson@doa.ri.gov.

Yours truly,



Meredith E. Brady
Associate Director

cc: Kevin Nelson

MEMO

To: Benny Bergantino, Statewide Planning Program
From: Stacy Wasserman
Date: September 27, 2018
Subject: Charlestown Comprehensive Plan – Comments on the draft Housing Element

You have asked for RIHousing's comments on the Housing Element of Charlestown's draft Comprehensive Plan (the "Plan"). Below are RIHousing's comments based on the state guidelines governing the required contents of Comprehensive Plans.

Our comments are organized into the following categories, which correspond to the elements required in the Comprehensive Planning Standards Manual: Existing Conditions, Current Needs and Future Projections; and Strategies to Reach the 10% Affordable Housing Threshold.

Existing Condition, Current Needs and Future Projections

- In general, the plan gives a good overview of the existing housing context. A few additional required items should be noted (some may be included in other sections of the Plan, which are not yet available):
 - In addition to noting the number of cost burdened owners and renters, the Plan should note the number of cost burdened owners and renters who are also low or moderate-income households.
 - Provide an overview on areas of the community in which housing is located – including, density, housing types, housing condition and housing age.
 - Population changes including age, ethnicity, income and household size.
 - The Plan notes homelessness may arise for some renters due to the seasonal rental patterns in the town, but does not note what, if any, options are available in town for those experiencing homelessness. The Plan should note this and the number of shelter beds available, if any.
 - Relationship between the cost of housing and income over past 10 year or more.
 - While not required, a map showing where the affordable housing units are located throughout the town would be a helpful visual.
- The Plan notes there are currently 131 LMI units in Charlestown (this number, per RIHousing's 2017 Low Mod Chart is actually 130). Based on the town's current year-round housing stock, 10% of the stock is 337 units. This results in a current gap of 207 units. The Plan notes that the projected year-round unit count in 2035 is 3,617 which equals a projected gap of 232 LMI units needed to reach the 10% threshold by

that year (the plan notes that 238 will be needed, but our calculation finds this to be 232).

Strategies to Reach the 10% Affordable Housing Threshold

- The Plan does a good job of reviewing strategies proposed in Charlestown’s 2004 Affordable Housing Plan, including their current status and next steps. Of those strategies, four have been proposed as current strategies:
 - Regional Strategies
 - Accessory Dwelling Units (While the updated ordinance for this has not been utilized, it is a creative approach to incentivizing deed-restriction. RIHousing would be interested in being kept up to date on any utilization.)
 - Adaptive re-use/location specific projects (In general, this is a good strategy, but the town should identify locations other than those identified in 2004.)
 - Creative subsidies and regulations
 - Mixed Use
- The two new strategies are:
 - Collaboration with Narragansett Indian Tribe
 - Special Needs Housing

The Plan should include more information on the last two strategies – there is only a short paragraph on Collaboration with Narragansett Indian Tribe, and no information included on creating more special needs housing.

It should be noted that Charlestown does not have any LMI family rental housing. The Plan discusses the challenges of developing year-round rental housing in Charlestown, particularly since most rental housing serve as vacation rentals in the summer, therefore only being available for long term lease for 9 months out of the year. The town may want to consider addressing this gap in the market with specific strategies targeted to family rental housing.

Overall, Charlestown’s Plan has a decent Housing Element that addresses most required topics. The proposed strategies of zoning changes, incentives for deed-restricting housing as affordable, working with neighboring communities to develop housing, accessory dwellings, and identifying strategic locations in town for the placement of affordable housing make sense and are realistic over the long term. RIHousing recognizes the challenges for communities rural in nature with a lack of infrastructure and the need to meet the 10% goal.

In addition to the strategies noted on page 24, the Plan provides a number of Actions worthy of consideration that should be fleshed out more, along with the strategies.

With all of this in mind, Charlestown should look into additional strategies that could lead to the creation of affordable housing beyond what was proposed in 2004. While those

strategies may still be viable options, if they have not achieved the desired results over the last 14 years, it's difficult to envision that they will produce the projected number of units moving forward.

The Plan should also include an implementation matrix that provides additional information as to the who, what, where, how, etc., for the actions and strategies proposed. This includes noting the targeted populations for the housing to be produced from each strategy – family, seniors, etc. This will assist the town in making a realistic projection as to how they will get from the current number of LMI units to the projected number under each strategy. Benchmarks to measure progress should also be included.

RIHousing looks forward to reviewing the next iteration of Charlestown's Plan, and hopes that any missing information will be included, and in addition to new strategies, current strategies will be fleshed out a bit more.

OCT 23 2018