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Ridgefield Planning and Zoning Commissioners,

I am a local commercial real estate business owner and a resident of Ridgefield; I am also a former Planning and Zoning Commissioner. I have studied the Draft Inclusionary Zoning Regulations and associated memos and data from other nearby communities. There are several items that concern me, starting with the memo from the Director of Planning and Zoning dated 11/18/2022 and updated 12/20/2022. It appears the regulation doesn't make financial sense for those who would wish to develop in Ridgefield. If I have read the documents and reports by local newspapers correctly, this regulation is being proposed to stimulate the growth in affordable housing and in part because some people fear a developer utilizing CGS 830(g) in town. It is generally understood that little can be done to protect Ridgefield from the imposition of 8-30g as the 10% threshold would require the addition of 600-700 affordable units based upon statewide standards. At 15% mandated this would require adding close to 4,000 to 6,000 new family units to a town that currently has only 9400 family units. Some fear CGS 830(g) because it allows developers to circumvent local zoning, hence losing control. In fact, it is my opinion that this will drive developers to pursue 8-30 (g) development as it will be more economically viable and profitable than adhering to this change. Further, this proposed regulation unreasonably takes away control from the landowner. Simply put, this will devalue Ridgefield land and lower the amount of tax revenue growth to the town, further burdening current homeowners. I also would like to point out my concerns with the Draft language. Proposed section 8.8 B states this regulation shall apply to all zones. I would suggest adding that are served by adequate public water and sewer or apply it only to the Central Business District. Section 8.8 C 2 states that in a phased development project, the affordable units will be constructed in the first phase. For most developers affordable units are at best a break even or more frequently, where land is costly such as in Ridgefield, they are a loss. Few lenders or investors would be willing to bear this added risk. Section 8.8 C 3 states that the affordable units will be mixed throughout the project. This is quite vague and subject to much interpretation. Proposed section 8.8 E states that a fee may be paid in lieu of constructing some or all of the affordable units. The proposed section then states that the fee will be based on 300% of the Danbury, CT HUD Metro FMR Area Median Income. This is the first time within these proposed regulations that the Danbury Metro Area is mentioned. Is the entire proposed regulation based on the Danbury Metro Area? If so, that should be stated in proposed section 8.8 C for clarity and transparency. The statewide median household income as a basis for rentals is considerably lower than the Danbury Metro Area and the economics of such limitation would require developers to make a large number of small units. This would either necessitate high rise development which is not permitted by local zoning or low-cost construction. This further drives developers to pursue 8-30 (g). If we expect developers to spend more money on sustainability, energy generation, communal areas and greenways then basing the affordability on statewide standards is economically ill advised.

Bob Cascella
January 13, 2023

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JAN 13 2023

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