

**TOWN OF BOZRAH
BOZRAH TOWN HALL, 1 RIVER ROAD
BOZRAH, CONNECTICUT 06334**

BOZRAH PLANNING & ZONING COMMISSION

AGENDA

Thursday, February 11, 2021
Zoom meeting, 7:00 p.m.

See bottom of agenda for participation instructions

The Bozrah Planning & Zoning Commission will hold its regular meeting on Thursday, February 11, 2021 via Zoom teleconference/videoconference, at 7:00 p.m.

1. Review and approve the minutes of the December 10, 2020 regular meeting.
2. Review correspondence pertaining to agenda items.
3. Hear the report of the Zoning Enforcement Officer.
4. New Business:
#01-00-21. David J. Gesiak, LLC. 216 Norwich, Ave. Lebanon, CT: Seven-lot subdivision, southeast corner of Bozrah Street and South Road (Map, 14, Lot 046).
5. Affordable Housing Plan discussion and next steps.
6. Public comment period.
7. Review general correspondence.
8. Such other business as the commission may vote to hear.

Stephen Seder, Chairman
Planning & Zoning Commission

Join Zoom Meeting

Web: <https://us02web.zoom.us/j/85282976301>

Call-in: +1 (929) 205-6099

Meeting ID: 852 8297 6301

**REGULAR MEETING
TOWN OF BOZRAH
PLANNING AND ZONING COMMISSION
December 10, 2020**

Chairman Steve Seder called the regular meeting of the Town of Bozrah Planning and Zoning Commission to order at 7:00 PM, on Thursday, December 10, 2020. The meeting was held via Zoom video/teleconference.

Members present: Stephen Seder (Chairman), Scott Barber (Vice Chairman), Nancy Taylor, Manny Misarski, Steve Coit (alt.).

Members absent: Steve Gural, Seymour Adelman (alt.), Frank Driscoll (alt.).

Others present: Glenn Pianka (Board of Selectmen), Katey DeCarli (ZEO/WEO/CHA Assoc.), Sam Alexander (Town Planner/SCCOG).

Chairman Steve Seder called the meeting to order at 7:00 PM. Mr. Seder appointed Steve Coit to sit in place of Steve Gural.

1. Review and approve the minutes of the November 12, 2020 regular meeting:

Nancy Taylor made a motion to accept the November 12 minutes as presented. Manny Misarski seconded the motion.

VOTE UNANIMOUS – MOTION APPROVED

2. Review correspondence pertaining to agenda items:

Correspondence received and sent regarding short-term rentals are discussed below.

3. Hear the report of the Zoning Enforcement Officer:

Katey DeCarli, P.E. (ZEO/WEO) discussed her staff report and Commissioners were able to ask questions.

Ms. DeCarli explained that she received a letter from residents of Gager Road regarding the property being used as a short-term rental on Airbnb.com. The residents asked for Ms. DeCarli to use the zoning regulations to help correct issues related to noise, trespass, issues with parking, and other nuisances arising from the property's status as a short-term rental. Ms. DeCarli replied to the residents explaining that adopting an ordinance is the preferred course of action for the town. The response letter also indicated that the residents may take a civil action against the owner of the property.

Ms. DeCarli discussed other aspects of her report and answered questions. Ms. DeCarli discussed next steps in *Town of Bozrah v. Haugh*. Katey DeCarli explained that she and the Town Planner have been fielding inquiries about 410 Salem Tpke.

There was discussion regarding parking at 44 and 46 Lebanon Road. Mr. Sam Alexander (Town Planner) will look at the files. Ms. Taylor asked about whether or not the use discussed at the last meeting, a salon, could be accommodated on the septic system. Mr.

Alexander stated that he believed that Uncas Health District considers such things when issuing licenses.

4. Short-term rental ordinance:

Sam Alexander explained that a draft ordinance was prepared. Following a discussion with the Town Attorney, Mr. Alexander felt it was premature to discuss the ordinance in detail due to the fact that a Town Meeting on the subject may not be held, due to Executive Orders by the Governor. Scott Barber asked about fees. Mr. Alexander explained that appropriate fees for building and fire inspections were incorporated into the overall fee declared in the ordinance.

5. Year-end discussion of Planning & Zoning topics:

Steve Seder asked the Commission for an assessment of activities in the past year and asked if they would like to bring up any topics. The Commission generally felt that the year was successful, especially considering circumstances of the COVID-19 pandemic.

Scott Barber spoke about ensuring alignment of the Commission's planning goals with the Board of Selectmen. Mr. Barber spoke about the need for water on Route 82. Glenn Pianka (Board of Selectmen) echoed Mr. Barber's comments about inter-board/commission cooperation. There was discussion about the need for an Economic Development Commission, and whether or not the goals of such a commission could simply be pushed forward by both the Planning & Zoning Commission and the Board of Selectmen, in cooperation with the Inland Wetlands & Conservation Commission.

6. Adopt 2021 meeting schedule:

Sam Alexander explained that the draft 2021 meeting schedule includes an alternate day of the second Wednesday (11/10) in November, in place of the typical November meeting day because of a conflict with Veterans' Day.

Manny Misarski made a motion to approve the meeting schedule as presented. Scott Barber seconded the motion.

VOTE UNANIMOUS – MOTION APPROVED

7. Public comment period:

There was none.

8. Review general correspondence:

There was none.

9. Such other business as the Commission may vote to hear:

Sam Alexander reminded the Commission that a public workshop was to be scheduled in January per the plan of work for the affordable housing plan, which is being drafted in compliance with state law. Mr. Alexander proposed that a public zoom session be held on Thursday, January 28th to gain input into the plan. Mr. Alexander will brief the Commission on specifics of the workshop at the January 14th meeting.

Scott Barber mentioned that he felt the draft short-term rental ordinances should be brought to the public for comment sooner rather than later and suggested discussion at a Board of Selectmen's meeting. Glenn Pianka discussed the possibilities for legislation and stated that perhaps the Connecticut Conference of Municipalities or the Council of Small Towns could advocate for such legislation. Sam Alexander suggested bringing the topic to other members of the Southeastern Connecticut Council of Governments, and see if any other municipalities are dealing with the same thing and if there is interest in pushing legislation.

Scott Barber made a motion to adjourn. Nancy Taylor seconded the motion.

VOTE UNANIMOUS – MOTION APPROVED

The meeting was adjourned at 8:01 PM.

Respectfully submitted,
Samuel Alexander (acting secretary)
Town Planner/SCCOG

Town of Bozrah

Affordable Housing Plan

Draft **Introductory** Sections- January 2021

Prepared by Southeastern Connecticut Council of Governments Staff

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Introduction

What is Affordable Housing?

Generally, housing is considered *affordable housing* if its occupants are lower-income households who pay no more than 30% of their income toward housing costs, including mortgage, rent, property tax, and utilities. *Affordable housing* created or maintained under government subsidies or programs is usually intended for occupancy by households earning no more than 80% of median income, which funding programs often measure at the regional or state level. HUD's calculations for the Norwich-New London area define a family of four earning up to \$78,500 per year as low-income under HUD's 80% Area Median Income calculations.ⁱ Housing programs usually require that occupants pay 30% of their income for their housing and subsidies cover the remaining operating costs.

HUD Metro Area	Median Family Income	Income Category	Persons in Family			
			1	2	3	4
Norwich-New London Metro	\$91,800	Low Income (80%)	\$54,950	\$62,800	\$70,650	\$78,500
		<i>Equiv. Monthly Housing Budget</i>	\$1,374	\$1,570	\$1,766	\$1,963
		Very Low Income (50%)	\$35,950	\$41,050	\$46,200	\$51,300
		<i>Equiv. Monthly Housing Budget</i>	\$899	\$1,026	\$1,155	\$1,283
		Extremely Low Income (30%)	\$21,600	\$24,650	\$27,750	\$30,800
		<i>Equiv. Monthly Housing Budget</i>	\$540	\$616	\$694	\$770

Affordable housing is created either with the support of government subsidies assisting in the cost of its construction and long-term affordability provisions, or in the case of some mixed-income set-aside developments, through profits earned through the development of market-rate units supporting the construction cost and long-term affordability provisions of the affordable housing units. Recent public investments in affordable housing in southeastern Connecticut include Stonington's Spruce Meadows (new mixed-income apartments), Waterford's Victoria Gardens (mixed-income elderly apartments), and Groton's Branford Manor (capital improvements to existing 100% affordable apartments).ⁱⁱ Common sources of funding include the Federal Government's Low Income Housing Tax Credit Program and the State of Connecticut's Competitive Assistance for Multifamily Properties (CHAMP) program. Different funding programs can target different types of housing or affordability for households at different income levels. Most affordable housing developments that depend on government subsidies receive funding from multiple State of Connecticut or federal programs.

Why Plan For Affordable Housing?

Under Connecticut law, municipalities are delegated the authority to regulate land use development according to laws set forth in Title 8 of the Connecticut General Statutes. Local zoning regulations establish rules for the location and type of housing that can be constructed in Connecticut. State statutes specify the conditions under which municipalities may adopt local land use plans and regulations. CGS § 8-23 establishes a requirement for municipalities to adopt local Plans of Conservation and Development, which document policies and goals for the physical and economic development of a municipality. CGS § 8-2 outlines the authorities municipalities are granted to adopt local zoning regulations. Both CGS § 8-23 (planning) and § 8-2 (zoning) direct municipalities to consider the need for affordable housing, both locally and at the regional level, and to adopt zoning that encourages the development of multifamily dwellings and housing at different price points. CGS § 8-30j, added in 2017, established an additional obligation for municipalities to adopt Affordable Housing Plans that will specify how the municipality will increase the number of local "affordable housing developments".

The § 8-30j requirement for Affordable Housing Plans was passed in recognition of increasing challenges for Connecticut residents in finding adequate affordable housing, especially outside of Connecticut's most urban communities. Since 2000, the share of Connecticut renters who pay more than 30% of their income towards housing rose from 37% to 46% in 2019. Homeowners with mortgages also saw their budgets stretched, with 20% of homeowners housing cost-burdened in 2000 and 31% in 2019. In Southeastern Connecticut, one in four households earns less than 80% of the area median income and is housing cost-burdened.

§ 8-30j(a): "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."

The 8-30j Affordable Housing Plan statute references the definition of *affordable housing developments* included in CGS § 8-30g, which defines them as *assisted housing* that receives government subsidies to provide affordable housing for low and moderate households, or a *set-aside development* where deed restrictions ensure that at least 30% of the housing units are occupied by low-income households at affordable rates for at least 40 years. This definition of housing would include any deed-restricted affordable housing created as part of a mixed-income development, as well as affordable housing built or preserved with the support of state or federal programs.

The Affordable Housing Plan is an opportunity for municipalities to more closely examine housing needs and review how existing housing inventories and land use policies do or do not address those needs. The planning process also prompts a review of potential actions that municipalities may take that would enable or promote the development of housing that is affordable and accessible to lower-income residents. In 2020, the Connecticut Department of Housing worked with the Regional Plan Association to develop guidance on how municipalities might approach the development of Affordable Housing Plans (https://portal.ct.gov/-/media/DOH/AHPP-Guidebook_RPA_120120.pdf), and provided small grants to support municipal work to prepare plans. The initial deadline for compliance with the requirement for an Affordable Housing Plan statute is June 2022, five years from the statute's effective date.

Plan Development Process

The development of an Affordable Housing Plan for Bozrah is being overseen by Bozrah's Planning & Zoning Commission, with opportunities for members of the public to provide suggestions and feedback. Ultimately, the Plan will be considered by the Commission for adoption.

Housing Conditions in Bozrah and Southeastern Connecticut

Affordability

A 2018 review of housing conditions in southeastern Connecticut prepared by the Southeastern Connecticut Council of Governments (SCCOG) in partnership with the Southeastern Connecticut Housing Alliance (SECHA) showed that demand is most acute in southeastern Connecticut for lower-cost housing and rental housing. The portion of southeastern Connecticut households that can afford the housing they live in has dramatically decreased in the last twenty years. Since 2000, the share of renters who cannot afford their housing, and are therefore housing-cost-burdened, increased from 31% to 46%. As previously mentioned, as of 2018, 29,000 households in southeastern Connecticut earned less than 80% of the area's median income and were housing cost-burdened, or one in four households.

The rise in housing challenges is linked to a growing mismatch between incomes and housing costs. Adjusted for inflation, income growth in the region has been stagnant, growing less than 1% between 2000 and 2019, while for-sale housing prices and rents have increased 23% and 19%, respectively.

SCCOG's projections of future housing needs estimate that based on the expected demographics of future southeastern Connecticut households, demand will continue to increase for lower-cost and multifamily housing. Of the approximately 7,000 additional households expected by 2030, more than half are expected to be low-income, partially due to growth in the number of senior citizens, as baby boomers continue to age into retirement, as well as young workers who typically earn lower wages. New housing production of a little more than 500 units per year would satisfy expected new need for housing, but not address existing unmet needs.

Bozrah has just over 1,000 housing units, of which approximately 86% are owner-occupied. The median value of an owner-occupied home in Bozrah is approximately \$230,000, just slightly under the median value for homes in New London County.ⁱⁱⁱ Median household income is approximately \$87,000, higher than the county median of \$71,000.^{iv} According to census data, there are only about 100 multifamily homes in Bozrah, and data on rental values is not available due to the small data sampling size. The median rent in New London County is approximately \$1,110 per month.

Local and Regional Housing Market

Housing in southeastern Connecticut's suburban and rural municipalities skews toward larger single-family homes, while one-bedroom units are concentrated in the region's urban centers. Many of the region's suburban and rural communities have few alternatives to the single-family home, with single-family housing making up over 90% of housing in some communities. Homeownership is also more common in

rural/suburban towns, with urban households slightly more likely to rent (54%) than own, and suburban/rural households much more likely to own their homes (80.1%).^v

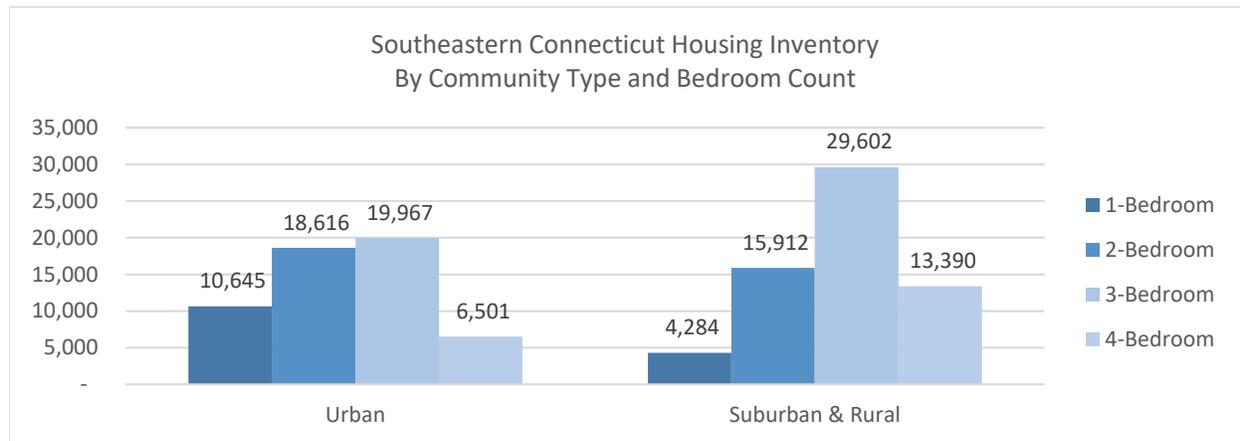


Figure 1. Housing in Southeastern Connecticut: Units by Number of Bedroom and Urban or Suburban/Rural Community Type. Additional 0-bedroom and 5+ bedroom units not shown. Source: U.S. Census American Community Survey (ACS) 2018 5-Year Estimates.

Housing construction in southeastern Connecticut has remained sluggish since the 2008 recession began, with annual production hovering around 300 units per year. Housing construction has traditionally focused on the production of single-family homes in suburban and rural municipalities (**Error! Reference source not found.**). Recent spikes in multifamily construction in suburban/rural towns occurred in 2014 and 2015, but these levels were not sustained in 2016 and 2017. Building permit data reported to the U.S. Census indicates that from 2000 to 2017, permits for 100 new housing units were awarded in Bozrah, activity similar to the regional average. The median sales price for a single family home in Bozrah was \$239,900, with 27 sales in 2019.^{vi} More recent county-level data shows median sales price increased from \$230,000 in 2019 to \$270,000.^{vii}

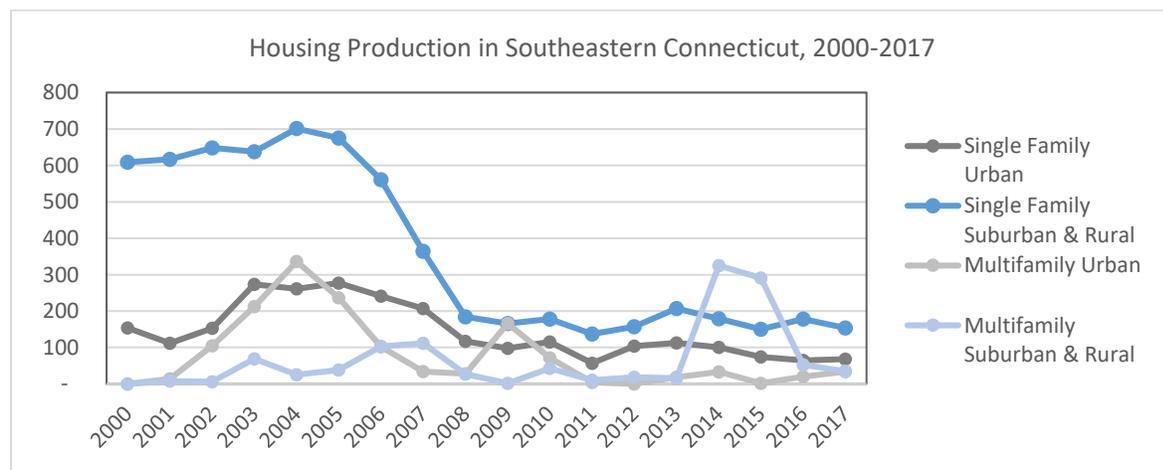


Figure 2. Housing Production Levels by Housing Type and Community Type, 2000-2017. Source: U.S. Census via Connecticut Department of Economic and Community Development.

Housing Production and Regulation in Bozrah

SCCOG’s 2018 Regional Housing Needs Assessment reviewed zoning regulations and the availability of vacant land in all of its member municipalities. The review revealed that large-lot, residential zoning is the most common in the region, based on overall land area. New opportunities for single-family homes exist in all towns, while 14 of the region’s towns have opportunities for multifamily development on land in or close to sewer service areas, and an additional four municipalities (including Bozrah) enable multifamily development in areas not served by sewer.

Much of the land in Bozrah is zoned for one- or two-family housing development (R-1, R-2, and RU-1 in the following zoning map). Multifamily development (3 or more units per structure) is permitted where the Village Overlay Zone overlays properties zoned R-2. The intent of the Village Overlay Zone is to allow for the development of permitted uses at a scale and density that enhances the existing Fitchville Center and allows the area to be better defined as a typical Village Center. Additionally, it is intended that this location provide opportunities and benefits for the town with regard to small-scale residential and non-residential developments. It is intended that structures be designed to reflect typical New England architecture, and have site layouts that fit in and compliment the Fitchville Village setting. Multifamily development is allowed on R-2 Village Overlay parcels greater than 30,000 square feet with no more than four units per acre. Multifamily homes cannot include more than two bedrooms per unit or be less than 600 square feet in size per unit. “Elderly Housing” for residents 55 and older is allowed in the R-2 and C/R zones at a density of no more than four units per acre. Regulations were recently adopted permitting assisted living facilities in the Highway Commercial zone, enabling the construction of the Elmbrook Village facility on Rte. 82.

Accessory dwelling units are allowed as a secondary use to a single family home in residential districts, and are referred to as “Family Apartments” in the Bozrah zoning regulations. The units must be part of the principal structure and occupied by family members of the owner of the residence, and may not be rented or used for income purposes.

Figure 3: Excerpt from 2018 Southeastern Connecticut Regional Housing Needs Assessment

Summary of Bozrah Housing Production Regulations (from 2018 Southeastern Connecticut Regional Housing Needs Assessment)

Town of Bozrah- Sewer only present on Route 82 between Noble Hill Rd and Norwich town line.

Single-Family: Permitted in the R-1 and R-2 residential and the Commercial/Residential (C/R) zones.

Two-family: Permitted in the R-2 zone and the Village Overlay Zone in the Village of Fitchville.

Multi-Family: Permitted in the Village Overlay Zone, overlaying the R-2 zone.

Mixed-Use: Permitted in the Village Overlay Zone, overlaying the R-2 or C zones.

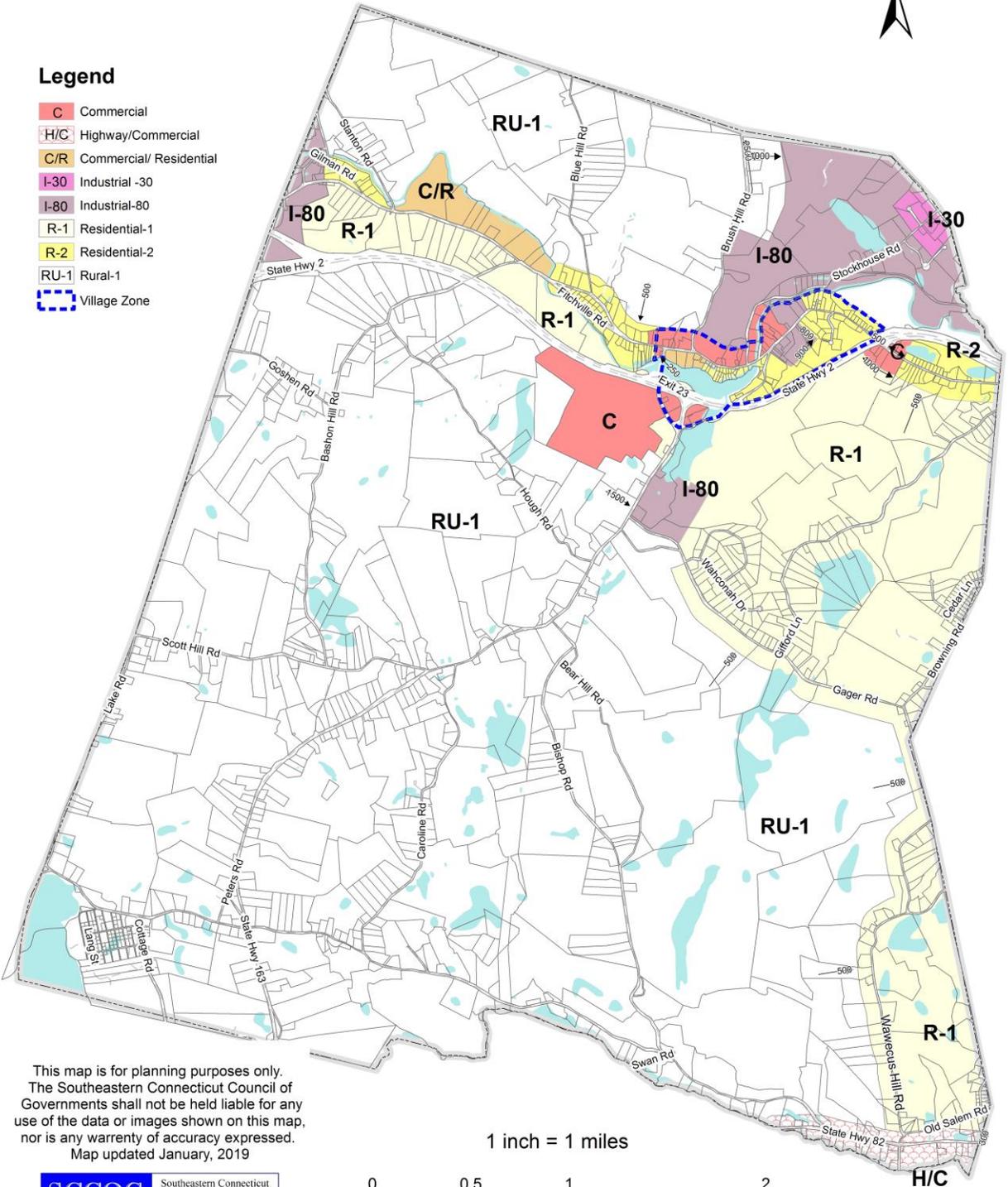
Accessory Apartments: Permitted for occupancy by relatives only, in zones permitting single-family.

Bozrah, Connecticut Zoning Map



Legend

- C Commercial
- H/C Highway/Commercial
- C/R Commercial/ Residential
- I-30 Industrial -30
- I-80 Industrial-80
- R-1 Residential-1
- R-2 Residential-2
- RU-1 Rural-1
- Village Zone



This map is for planning purposes only.
 The Southeastern Connecticut Council of
 Governments shall not be held liable for any
 use of the data or images shown on this map,
 nor is any warranty of accuracy expressed.
 Map updated January, 2019



The Local Plan of Conservation and Development

The Bozrah Plan of Conservation and Development (POCD) was most recently updated in 2015. The POCD addresses the fact that housing prices have risen dramatically across the State, including in Bozrah, since the turn of the century, even in the years following the most recent recession. It also acknowledges that Bozrah, like many rural towns, is well under the CGS § 8-30g goal of 10% assisted housing.

A POCD questionnaire administered to residents in 2013 yielded the following results:

- Respondents were asked to rank their preferences of housing types that should be allowed in town. The overall high-to-low ranking is as follows: Single-family, Elderly, Single-family in clusters, Accessory apartments, Two-family, and Condominiums (tied), Rental apartments.
- Respondents were asked which group of individuals' housing types should be encouraged in town. 33.6% chose "Elderly" housing, 27.9% chose housing for "Singles", 20.8% chose housing for "Families", and the remaining 17.7% choose "None".

The 2015 POCD identified the following Community Development Goals related to housing:

- Retain Bozrah's rural character outside of the designated higher density growth areas delineated in this plan.
- Encourage a variety of housing types, designs, and settings to accommodate present and future residents of all age groups and economic levels.
- Promote the enhancement of the existing densely settled village areas of Fitchville and Gilman.
- Encourage the utilization of existing public water supply for intensive land uses and patterns of development.
- Encourage the improvement and utilization of the public water supply in the Fitchville area of town.
- Promote the expansion of public utilities in areas deemed appropriate by this plan.
- Preserve and enhance those features in the town that have historical and architectural significance.
- Promote architectural design standards which have styles typical of New England and which are harmonious within each locational setting as part of the site plan requirements.

The POCD clearly calls for a greater diversity of housing choices, sited and built in a way that complements the orderly development of the Town. This sentiment is reflected in the zoning regulations as well, in particular the Village Overlay District.

Affordable Housing Appeals Act (§ 8-30g)

Connecticut's Affordable Housing Land Use Appeals statute, C.G.S. § 8-30g, was established in 1997 to enable the development of affordable housing in municipalities where zoning regulations would otherwise prevent its construction. Municipalities are subject to § 8-30g of the Connecticut General Statutes when less than 10% of the municipal housing stock meets the statute's definition of affordable. The statute encourages development approvals for deed-restricted affordable housing by requiring that upon appeal of a development proposal for affordable housing that is rejected by a municipality with less than 10% affordable

housing, the municipality must demonstrate that public interests in health, safety, or other matters clearly outweigh the need for affordable housing.

The State of Connecticut's 2019 Housing Appeals List shows that just over 3% of housing in Bozrah counts as affordable housing for the purpose of determining the applicability of the § 8-30g statute. In determining the percent of affordable housing present in a municipality, the CT Department of Housing counts:

- Assisted housing units or housing receiving financial assistance under any governmental program for the construction or substantial rehabilitation of low and moderate income housing that was occupied or under construction by the end date of the report period for compilation of a given year's list;
- Rental housing occupied by persons receiving rental assistance under C.G.S. Chapter 138a (State Rental Assistance/RAP) or Section 142f of Title 42 of the U.S. Code (Section 8);
- Ownership housing or housing currently financed by the Connecticut Housing Finance Authority and/or the U.S. Department of Agriculture; and
- Deed-restricted properties or properties with deeds containing covenants or restrictions that require such dwelling unit(s) be sold or rented at or below prices that will preserve the unit(s) as affordable housing as defined in C.G.S. Section 8-39a for persons or families whose incomes are less than or equal to 80% of the area median income.

The majority of the 33 qualifying homes in Bozrah are homes financed with CHFA or USDA mortgages (30 homes). Three homes are occupied by tenants who receive rental assistance.

As mentioned, municipalities that have 10% or more of their housing inventory falling into the above categories are exempt from § 8-30g appeals. Municipalities may also be granted four-year temporary exemptions by demonstrating progress in facilitating new affordable housing. The threshold for achieving a moratorium is new affordable housing created equal to the greater of two percent of existing housing, or housing earning 50 "Housing Unit Equivalent" points. New housing qualifies for between ½ and 3 Housing Unit Equivalent points based on the size of the unit (more bedrooms earn more points), restrictions on occupancy (senior-only housing earns fewer points), and the affordability level of the unit (affordability to lower income levels earns more points).

The Town of Bozrah could achieve a moratorium with as few as 17 new affordable homes (three bedroom family units affordable to families at 40% Area Median Income) or as many as 100 homes for senior-citizens at 80% Area Median Income.

Action Plan Options (TBD)

Connecticut municipalities have flexibility in determining how they act to improve access to affordable housing. This plan should include steps appropriate to the Town of Bozrah that may be taken with the goal of creating additional affordable housing units in Bozrah, consistent with the other development and conservation goals of the Town. **Some of the strategies that have been implemented or considered by Connecticut municipalities are the following:**

Expand the capacity of the municipality to support ongoing housing initiatives

- Create a standing affordable housing committee/subcommittee to advance actions supporting housing

Increase Opportunities for Multifamily Development

- Review potential modifications to single-family zoning that would enable low-density, low-impact multifamily developments
- Pursue expansion of sewer service areas
- Identify sites that could accommodate multifamily housing, including municipally-owned sites

Support First-Time Home-Ownership and Aging-In-Place

- Work with local realtor community to publicize availability of USDA and CHFA low-interest home loans
- Apply for State of Connecticut “Small Cities” funding for rehabilitation of existing housing occupied by low-income residents, first time homebuyers, etc.
- Create municipal tax relief programs/down-payment/closing cost assistance for elderly, low income, first time buyers, etc.

Expand availability of lower-cost housing

- Consider modifying Accessory Dwelling Unit provisions to enable the rental of these units to non-family members.
- Consider adopting provisions for single-family cluster development, which enables smaller homes, reduces infrastructure costs, and reduces the environmental footprint of new construction

Increase availability of deed-restricted affordable housing

- Consider adopting inclusionary zoning provision (portion of new development must be deed-restricted affordable)
- Work with housing land trusts or other non-profits to acquire and rehabilitate existing housing for deed-restricted affordable housing

ⁱ HUD FY 2020 Income Limits Summary for Norwich-New London, CT HUD Metro FMR Area (towns of Bozrah, East Lyme, Franklin, Griswold, Groton, Ledyard, Lisbon, Lyme, Montville, New London, North Stonington, Norwich, Old Lyme, Preston, Salem, Sprague, Stonington, Voluntown, Waterford).

<https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn>

ⁱⁱ CHFA 2019 Summary of Programs. https://www.chfa.org/assets/1/6/2019_CGS_8-37bb.pdf.

ⁱⁱⁱ U.S. Census American Community Survey 2018 5-Year Estimates.

^{iv} Ibid.

^v Ibid.

^{vi} New London County 2019 Sales by Town, Eastern CT Association of Realtors.

^{vii} Fourth Quarter New London and Windham County SOLD Comparisons - 2020 vs. 2019, Eastern CT Association of Realtors.