



NATIONAL COUNCIL ON AGRICULTURAL LIFE
AND LABOR RESEARCH FUND, INC.
"First in housing services, because we care."

February 15, 2008

Dear Kent County Planning and Levy Court:

We at NCALL, your community nonprofit specializing in affordable housing, have had the opportunity to review the specific recommendations for housing in the draft Kent County Comprehensive Plan. Thank you for the open workshop process which has been an effective way to distribute the draft. I want to share how appreciative we are for the real emphasis on affordability along with the number of initiatives which would benefit the housing picture for our lower-income citizens and the more moderate income workforce. This draft and the initiatives therein demonstrate the kind of creativity necessary to address the difficult issue of affordable housing, and could well become a model within Delaware and the region.

The Delaware State Housing Authority's 2008-2012 Needs Assessment clearly demonstrates the extent and variety of housing needs statewide and in Kent County. Whether it be homes affordable to first-time homebuyers; the need for quality apartments for very and extremely low-income households and elderly; the importance of preserving ownership and rental stock through rehabilitation; the basic premise of having affordable housing opportunities for our current workforce and to attract future employers; and the demand for transitional units for homeless and special needs populations, Kent County has a substantial challenge ahead.

Specific Comments:

1. We do believe you are on the right track focusing higher density housing within areas where there is infrastructure and services.
2. We concur that infill development should be promoted to help achieve this.
3. A full review of regulatory barriers that impede affordable housing development should be undertaken and the rehabilitation sub-code and accessory dwelling unit proposals seem very positive.
4. We are not sure that the TDR program by itself will result in everything that is hoped for as the primary mechanism to eliminate sprawl while providing higher density/more affordable land on which to build, as it is untried locally. To be very sure affordability is properly addressed, a substantial increase in the amount of land zoned for higher density housing, such as the traditional R-3 or R-4, should be established in the growth and service areas.

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5. Development of a Down Payment and Settlement Assistance program for first-time homebuyers is a great move. NCALL helped design Dover's First Start program. Knowing and using all the DPSA programs in the state as we provide homeownership counseling, we could help you design a particularly effective one for our home county.
6. Establishment of a Housing Trust Fund makes an important long-term commitment to affordable housing, will allow resources to be amassed for the purpose, and creates a forward looking mechanism to address this most basic of human needs.
7. We are pleased the County is open to the Community Land Trust model which could be one piece of a multi-faceted puzzle to address affordable housing needs, particularly for the long-term.
8. We applaud the idea for a public committee to address affordable housing and certainly want to be represented as we have significant expertise to offer.

The mandatory inclusionary zoning program is the most important aspect of this plan. Had one been in place during the previous building boom, it would have created many affordable units. New affordable housing stock is definitely needed; however, these types of programs have been proven not to work when voluntary. Please maintain the mandatory aspect and come up with a significant percentage of units within each new development that must be affordable. The Housing Trust Fund could provide a vehicle for developers to opt out of the inclusionary zoning program by making payment to the HTF.

The Planning Department and Levy Court Commissioners will no doubt hear from parties and interests that may oppose some of the affordable housing initiatives you hope to implement. It could be the Not In My Back Yard (NIMBY) position by households who already have their housing needs addressed or it could come from other segments that may see the initiatives as new regulatory measures.

These initiatives are aimed at the "consumer", Kent Countians that have unmet housing needs. I hope and trust that the Planning Department and Levy Court Commissioners will have the resolve to hold fast to these draft initiatives through the implementation stage. Kent Countians will suffer, economic development prospects will be negatively impacted, and the overall quality of life will be diminished by a retreat from this draft plan. After all, our goal is to serve Kent Countians.

Thank you very much for your hard work and vision.

Sincerely,

Joe L. Myer

Joe L. Myer
Executive Director