

Summary of Public Comments

Following extensive data collection, research, and community engagement, a draft Regional Housing Strategy was released for public comment on December 30, 2023. Public comment was accepted through February 16, 2024. Approximately 65 individuals and entities submitted comments during the public comment period.

Public comments received are available at <https://www.capecodcommission.org/our-work/regional-housing-strategy>. A summary of comments received and ways in which they informed the final Regional Housing Strategy follows.

Comments received generally address the following topics: the importance of balancing environmental protection with housing goals and ensuring that housing is located in appropriate locations; the need to prioritize redevelopment, reuse, and preservation of existing housing stock; the need to ensure infrastructure is adequate to address existing and future needs; concerns about loss of local control and the need to ensure additional stakeholder input is sought as recommendations are implemented; the need for action related to short-term rentals; and suggestions for new or expanded recommendations and strategies to include. Several general comments were received that noted the Regional Housing Strategy was well done, thorough, and provides important data and information.

Several comments were related to the importance of balancing environmental protection with housing goals and ensuring that housing is located in appropriate areas. Concerns about environmental protection and ensuring housing development, redevelopment, or advancement of housing goals do not come at the expense of environmental protection and open space were expressed.

Addressing housing challenges while also protecting the environment was always the intent of the Regional Housing Strategy. In response to comments, edits were made to make this more explicit. Some of the edits included separating out one guiding principle into two, one of which is to “protect natural and cultural resources” including ensuring “strategies and actions for housing protect the region’s natural environment.” Language was also added to several areas of the strategy to underscore the need to ensure recommendations are implemented in a way that will help address water quality, climate change, and other key regional challenges rather than exacerbate them.

Throughout the strategy there is language regarding the need for housing development and redevelopment to be targeted in appropriate areas – areas with infrastructure to support the housing units and ensure the environment is protected. Additional language was added in response to comments to provide greater emphasis. The strategy is not recommending housing be built anywhere at any cost, but in targeted, suitable locations that can help support not only housing goals but also other goals for the region. This is the case not only for the actual development of

housing units, but for the regulatory framework surrounding housing development or redevelopment. The recommendation for changing zoning, for example, includes “in appropriate locations” in its heading. Local zoning recommendations were developed with current and planned wastewater infrastructure in mind. Additionally, the housing suitability analysis will help provide more specific identification of locations that may be more suitable for housing development, guiding it away from sensitive natural resource areas, building upon the maps developed by Housing Assistance Corporation and the Association to Preserve Cape Cod. Additional language to provide further clarification and emphasis was included in several areas. Several comments were related to the role infrastructure plays in protecting and remediating water quality and the need to ensure appropriate infrastructure to address existing and future needs. Commenters specifically noted the need for sewerage and wastewater infrastructure to address current problems before adding housing units that could exacerbate water quality issues if not adequately served by infrastructure. Comments were also received about the interaction between flow neutral bylaws and providing infrastructure for additional housing units.

The Regional Housing Strategy recognizes the need for coordinated housing and infrastructure planning and development as one of its guiding principles. Language was added related to aligning zoning changes with wastewater and other infrastructure planning. Multiple areas of the plan discuss the need to target housing development and redevelopment in areas with infrastructure that can ensure protection of the region’s water resources while also providing capacity for housing development or redevelopment. Language was also added to clarify how the State Revolving Fund loan program, Massachusetts Clean Water Trust, and flow neutral bylaws may interact with housing development and redevelopment.

Along similar lines, the need to prioritize redevelopment, reuse, and preservation of existing housing stock was also expressed, as greenfield development may be less likely to have existing infrastructure, will often come at the cost of natural resources, and because the region must preserve the year-round housing that currently exists.

“Prioritize redevelopment” is one of the Regional Housing Strategy’s guiding principles. In response to comments, this guiding principle was expanded to explicitly include reuse and preservation of the existing housing stock. Language was also added in different parts of the plan to emphasize the priority of redevelopment in creating new housing opportunities.

Numerous comments were received regarding concerns about a loss of local control. Some of these comments included the need for stakeholder input as the recommendations in the Regional Housing Strategy, such as zoning changes or development of regional entities, are implemented. It was also noted that regional entities, such as the community land bank and housing land trust, should not work in conflict with conservation-focused regional entities that perform similar functions in terms of land acquisition. Suggestions for changes to some of the local zoning recommendations were also received.

While the Regional Housing Strategy provides local zoning recommendations for each community that could foster more housing opportunities, the process for changing the zoning remains firmly under local control and would require significant input from local community members. Adoption of these recommendations remains the responsibility of local decision-makers. Additionally, the creation of any new regional entity would only be feasible with the buy-in and support from each of the 15 communities on Cape Cod. The regional entities recommended in the strategy would not supersede any of the local committees or boards working to advance housing (or land conservation) efforts, but rather would work in collaboration with them. The strategy includes implementation steps for each recommendation, many of which specifically reference the need for further stakeholder and community engagement. Commission staff worked with town staff to incorporate feedback on the local zoning recommendations.

There were several comments about the need for action related to short-term rentals, from regulating or limiting them to encouraging their conversion to year-round housing.

The Regional Housing Strategy includes a recommendation to encourage conversion of short-term rentals to year-round rentals. The Commission released fact sheets with the final strategy, which include information around short-term rental regulations, short-term to long-term rental conversion incentive programs, and occupancy or employment-based deed restrictions.

Some comments included suggestions on new or expanded recommendations or strategies to consider for inclusion in the Regional Housing Strategy. In response to those comments, Community Housing Development Organization was added as a strategy, as was homeowner education to assist people in obtaining and maintaining a home. Strategy fact sheets were developed for both. The list of services that the Regional Housing Services Office could provide was also expanded.