

TOWN OF CORNWALL SENIOR HOUSING STUDY 2019

Prepared

for the Town of Cornwall Town Board

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by

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Introduction

The Town of Cornwall 2019 Comprehensive Plan Update 2019 called for a thorough review of the Town's Zoning Code. As a part of this thorough review, the Town of Cornwall Town Board directed preparation of this study of age-restricted ("senior") housing in the Town, in order to create a comprehensive guide to any appropriate revisions to the Town's Zoning Code.

This study will consider the following:

- the senior population in the Town and County and their household characteristics
- the different types of age-restricted senior housing that are available within the Town of Cornwall, Orange County, and the wider region
- how the existing Town of Cornwall zoning addresses different senior housing types and options, and
- existing and pending age-restricted housing projects in the Town of Cornwall

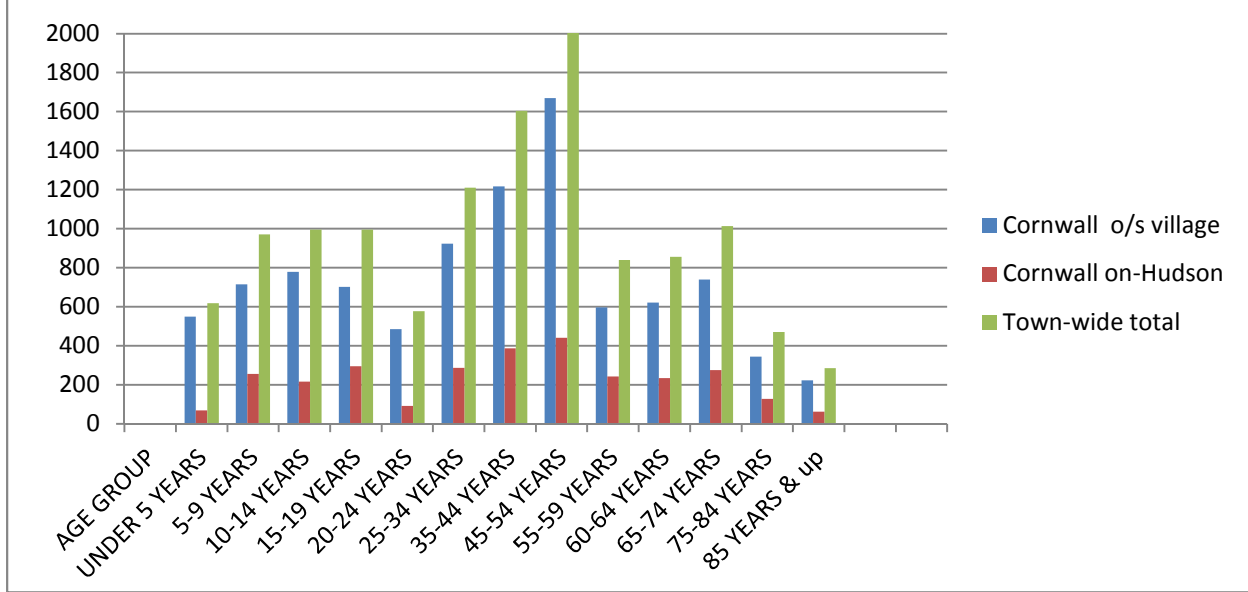
This study concludes with recommendations regarding potential revisions to the Town's Zoning Code. The recommendations for zoning revisions are made in order to ensure that the Town's zoning does not over-represent or over-provide for such housing, and that it is provided for in appropriate locations within the Town.

Demographics and Population

As noted in the Town of Cornwall's Comprehensive Plan Update 2019, the largest age group in the Town is between 45 and 54 years old, with a total of 17.5% of the unincorporated Town population in this category in 2015. The next largest age group category is 35 to 44 years old, at 12.7%. The four age groups that are 60 years and older form a combined total of 20.1% in the unincorporated Town, which is slightly higher than the County-wide percentage of 17.7%. The Village of Cornwall-on-Hudson has the highest percentage of residents aged 60 and older, at 23.5%. This is shown in Figure 1 below. The total population of the Town is 12,548, with 2,626 being 60 years or older¹.

¹ Derived from US Bureau of Census American Community Survey 5-year estimates ending 2015, as was the data in Figure 1.

Figure 1. Population by Age Group, Town and Village 2015



Tables 1 and 2 below address the household characteristics for households containing householders over age 65 in Orange County and in the Town of Cornwall. Table 1 addresses those Owner-Occupied households, while Table 2 addresses Renter-Occupied households.

| | Orange County | | Cornwall Townwide | | Town outside Village | |
|--|---------------|----------------|-------------------|----------------|----------------------|----------------|
| Total Number of Households | 125,270 | | 4,661 | | 3,535 | |
| | | % of total HHs | | % of total HHs | | % of total HHs |
| Total Number of Owner Occupied Households | 86,184 | 68.8% | 3,285 | 70.5% | 2,488 | 70.4% |
| Total Owner Occupied Family Households | 66,359 | 53.0% | 2,652 | 56.9% | 2,010 | 56.9% |
| Married Couple Family with Householder 65+ | 10,695 | 8.5% | 456 | 9.8% | 308 | 8.7% |
| Other Owner Occupied Family Households | 10,781 | 8.6% | 392 | 8.4% | 308 | 8.7% |
| Male Householder 65+ | 534 | 0.4% | 19 | 0.4% | 9 | 0.3% |
| Female Householder 65+ | 1,713 | 1.4% | 87 | 1.9% | 62 | 1.7% |
| Non-Family Owner Occupied Households | 19,825 | 15.8% | 633 | 13.6% | 478 | 13.5% |
| 65+ Householder Living Alone | 7,095 | 5.7% | 198 | 4.2% | 120 | 3.4% |
| 65+ Householder Not Living alone | 504 | 0.4% | 32 | 0.7% | 22 | 0.6% |

| Table 2: Household Characteristics for Selected Renter-Occupied Households, 2015 Orange County and Town of Cornwall (ACS estimates) | | | | | | |
|--|----------------------|-----------------------|--------------------------|-----------------------|-----------------------------|-----------------------|
| | Orange County | | Cornwall Townwide | | Town outside Village | |
| Total Number of Households | 125,270 | | 4,661 | | 3,535 | |
| | | % of total HHs | | % of total HHs | | % of total HHs |
| Total Number of Renter Occupied Households | 39,086 | 31.2% | 1,376 | 29.5% | 1,047 | 29.6% |
| Total Renter-Occupied Family Households | 22,429 | 17.9% | 593 | 12.7% | 432 | 12.2% |
| Married Couple Family with Householder 65+ | 907 | 0.7% | 42 | 0.9% | 42 | 1.2% |
| Other Renter-Occupied Family Households | 10,048 | 8.0% | 250 | 5.4% | 181 | 5.1% |
| Male Householder 65+ | 139 | 0.1% | 0 | 0% | 0 | 0% |
| Female Householder 65+ | 440 | 0.3% | 0 | 0% | 22 | 0.6% |
| Non-Family Renter-Occupied Households | 16,657 | 13.3% | 783 | 16.8% | 615 | 17.4% |
| 65+ Householder Living Alone | 4,512 | 3.6% | 242 | 5.2% | 212 | 6.0% |
| 65+ Householder Not Living alone | 269 | 0.2% | 0 | 0% | 0 | 0% |

Table 1 shows that, for owner-occupied households, there is a higher percentage of married-couple families with a householder over age 65 in Cornwall townwide than in Orange County as a whole, and a slightly higher percent of other family households and non-family households with female householders over age 65. Countywide, there is a higher percentage of owner-occupied senior male householders living alone. Table 2 shows that there are lower percentages of all senior households that are renter-occupied, with the exception of householders age 65 and over who are living alone. In the Town of Cornwall townwide and in the Town outside the Village, there are more senior renters than senior homeowners, with nearly twice the number in the Town outside the Village, and nearly twice the percentage Countywide. This suggests there is a comparatively greater interest or demand for rental housing for senior citizens within the Town.

Senior Housing and Zoning Within the Town of Cornwall

Current Zoning

At the time of this study, senior citizen housing is permitted in the SR-1, SR-2, and the GC Districts by special permit, subject to Section 158-24.

Section 158-24 states that “It has been determined that there is a need for housing developments specifically located and designed to meet the needs of older people, to be known as “senior housing areas,” which housing may include independent living or assisted living arrangements

of a combination thereof.” However, the same paragraph also recognizes that “such housing areas, if not properly located, constructed and maintained, may be detrimental to the general welfare, health and safety of the occupants of such developments and the Town of Cornwall at large.”

The language in Section 158-24 regarding the need for senior housing areas was originally adopted as part of Section 5.11 of Town of Cornwall’s 1980 Zoning Local Law (LL3 of 1980), which first established the senior housing areas in the Town’s land use regulations. The use was allowed by special permit in what was then the R-3 and the R-4 residential zoning districts, which roughly corresponds to the Town’s current SR-1 and SR-2 Districts, though the boundaries have been considerably changed since that time. It should be noted that the special permit use requirements in that local law provided for a maximum density of 20 units per acre for senior housing uses.

The current Zoning Code at Section 158-24 allows densities of 10 units per buildable acre for 2-bedroom units, and 11 units per buildable acre for one-bedroom units. However, the Code also provides for efficiency-type dwelling units as well as one- and two-bedroom units. Limits are established so that not more than two persons shall be permitted to occupy an efficiency or a one-bedroom unit, and not more than three persons are permitted in a two-bedroom unit. The maximum number of bedrooms per unit is capped at two. Occupancy is limited to persons who are 55 years of age or over, excepting only children residing with their parent, parents or legal guardians where the parent, parents or legal guardian. Design and layout requirements are established, along with requirements for parking, landscaping, utilities, and recreation areas, among other things. The special permit requirements also allow other related uses within a senior citizen housing area, such as cafeterias, self-service laundries or medical infirmaries, but only to the extent that they meet the personal needs of the occupants, and such facilities must be subordinate to the residential character of the area and located out of public view. Senior housing buildings must have either adequate public water or sewer or alternate systems with the approval of the Planning Board.

In contrast to the densities allowed for senior citizen housing uses, the residential uses permitted by right in the SR-1 and SR-2 Districts are significantly lower:

- In the SR-1 District, the minimum lot size for a single-family detached dwelling without central water or sewer services is 1 acre. With either central water or sewer services provided, the minimum lot requirement drops to 30,000 square feet. With both central water and sewer services provided, the minimum lot requirement drops to 20,000 square feet, and 2-family dwellings with both central water and sewer services require 30,000 square feet.
- In the SR-2 District, single family dwellings with central water and sewer services require 20,000 square foot minimum lot sizes, and 2-family dwellings require 30,000 square feet.

This means that senior citizen development densities in the SR-1 District range from roughly 10 times the density achievable for single family dwellings with no central facilities, to roughly 5 times the density for single family dwellings with existing central facilities, and nearly 3 times the density per unit for two-family detached dwellings. In the SR-2 District, senior citizen development densities are roughly 5 times the density for single family detached dwellings, and nearly 3 times the density per unit for two-family detached dwellings. While these multipliers are not an exact correlation, because single or two-family detached dwellings typically would have 3 bedrooms or more per unit, and thus would be anticipated to be larger than the maximum two-bedroom senior housing unit, it still provides a useful contrast: senior citizen housing developments are significantly more dense than unrestricted housing lots in the SR-1 and SR- 2 Districts.

In the GC District, strictly residential uses are not encouraged, as this is the Town's Main Street commercial district. This zoning district now provides for two dwelling units in a building containing a permitted commercial use, and the Comprehensive Plan Update 2019 recommends that this be modified to require that the commercial use be on the street floor and street-facing, with the residential units to be above the commercial use. As noted in the Plan Update 2019, this is done to promote the provision of additional rental housing units and to promote "eyes on the street" after business hours in commercial areas. The Plan Update 2019 also notes the presence of previously existing individual residential uses that are not part of a permitted commercial use. However, the Town discourages these in order to protect the limited areas of Town that are suited to commercial use, and for that reason, while the Town's zoning use table provides for single family detached dwellings in the GC District, it references the same bulk regulations that the same use would have in the SR-1 District.

Another kind of age-restricted zoning provision had been made for "Planned Adult Communities," which the Town's existing zoning allows by special exception permit within the PRD (Planned Residential District) established following the adoption of the Town of Cornwall 2005 Comprehensive Development Plan, adopted April 11, 2005. As explained in the 2005 Comprehensive Development Plan, "*Planned Adult Communities (PACs) are residential developments of at least one hundred or more units limited to residents without children. They are also described as active adult communities and contain restrictions limiting the families to at least one adult over 55 years of age and no children under ages 19 to 21 years. A PAC shall be limited to PRD zones and is intended to be allowed at a density of three dwelling units per usable acre.*" The 2005 Comprehensive Development Plan also noted specifically that these uses differ from senior housing in that they are designed for a younger (55 and older) population and the homes are larger. It noted that "*senior housing, which is generally at a higher density, is normally geared for older residents (at least 62 years of age) on limited incomes with a predominance of studio and one bedroom units*", and that developers normally seek Low Income Housing Tax Credits from the State for such projects.

Zoning adopted in 2005 provided for a single Planned Residential District within the Town. Prior to the adoption of the 2005 Comprehensive Development Plan, consideration had been given to at least two PRDs, one located south of Route 94 east of the High School, and another located west of Route 9W south of the New Windsor border. The Town was reluctant to have so much land committed for this highly specialized purpose, however, and established only a the one PRD west of 9W. Detailed special exception use permit requirements for Planned Adult Communities (PACs) were adopted as Section 158-21-X of the Code. These requirements establish, among other requirements:

- Age restrictions of 55 or older, except for units occupied by employees of the Homeowner's Association, units occupied by adults under age 55 accommodating disabled residents over age 55, spouses or domestic partners under age 55 residing with a spouse or domestic partner age 55 or more, children over age 19 but under age 55 and living with their parent(s) aged 55 or more, and children under age 19 when residing with their parent(s) or legal guardian(s), when special circumstances exist requiring such residency due to the death or disability of the custodial parent or guardian, with such residency being limited to the time necessary for replacement residence to be arranged.
- A variety of housing types is required in the PAC, with a range of unit types from multiple dwelling units, to attached single family dwelling units, and detached single family dwelling units.
- Accessory uses include recreation and maintenance facilities, up to two resident caretaker units per PAC, and congregate care or assisted living dwelling units.
- Commercial retail, office, hotel/motel, medical/dental clinics, personal service and food service, restaurant buildings and day-care centers are provided for, with up to a maximum of 12% of the gross site area being developed for such uses.
- Minimum site area of 35 acres, with a maximum permitted overall density of 3 dwelling units per usable acre for the total project area. In PACs of 250 or more dwellings, congregate care dwellings consisting of a senior assisted care facility and/or a nursing home facility is provided for at a maximum of 20 units per usable acre, with a maximum of 100 units.
- Design and layout requirements are included, along with setback, height, coverage and parking requirements, and minimum habitable area requirements for the various age-restricted unit types.

Existing Senior Housing Developments in Cornwall

Two existing senior housing developments have been constructed in the Town. The older one of the two is known as Idlewild Creek Apartments, located between Continental Road and NYS

Route 9W in the SR-1 District. Built around 1998, it contains 214 age-restricted one and two-bedroom rental units in total. At the time this project was built it received Low Income Housing Tax Credits, but those have since expired, and the project is now renting at market rate. The newer one is known as Canterbury Green, and is located on Quaker Avenue and Cedar Street in the GC District. This project was built in two phases, in 2011 and 2016, and contains 58 luxury units. The developer of Canterbury Green had asked about having the Town Board eliminate the age restrictions during the project's first construction phase, claiming that it was unable to sell the units for age-restricted use, but the Town declined to do so. Accordingly, the units are age-restricted and are rented at market rate.



Idlewild Creek Apartments

Two other age-restricted projects have been submitted to the Planning Board and are in varying stages of the land use review and approvals process. These include Chestnut Woods at Cornwall, and Cornwall Commons.

Chestnut Woods

The project known as Chestnut Woods at Cornwall is located on the east side of Route 32 near Vails Gate, partly in the HC and primarily in the SR-1 District. Chestnut Woods is described as a 180 unit one- and two-bedroom age-restricted (55+) residential gated community, with a 6,500 square foot community room and 12,000 square feet of retail/office space fronting on Route 32. According to the Planning Board's Lead Agency Written SEQR Findings Statement

adopted on February 5, 2007, eleven percent of the residential units were to be affordable, if bonus densities contemplated in the Town's 2005 Comprehensive Plan Update were enacted into law², while the rest would be rented at market rate. This project was never pursued beyond the completion of the SEQRA review process, as the proposed project required permits and approvals from outside agencies. Among these were utility connections, and at the time the Findings were adopted, the Town of New Windsor was under a moratorium for water connections. No further pursuit of any further land use approvals has been made, other than the height variance that the project had required.

The Planning Board noted in its SEQR Findings that "if these outside agencies act other than as requested, this could reduce the project from its proposed form evaluated pursuant to SEQR." It should be noted that the "as of right" residential alternative for developing the SR-1 portion of the Chestnut Woods site was for 12 single family detached dwellings, according to the SEQR Findings.

Cornwall Commons

The project known as Cornwall Commons is located on the west side of Route 9W south of the Town of New Windsor line, in what is now the Town's only PRD. In the year 2000, when the project was originally proposed, the area of the site that was then in the Town of Cornwall lay entirely within the PIO (Planned Industrial Office) District, which permitted laboratories, offices, light manufacturing and other uses by right, and a range of other industrial uses by special permit. The only potentially residential use provided for in that district was an accessory gatehouse or watchman's quarters³. A 52.8-acre portion of the property lay in the Town of New Windsor, in an R-3 residential zoning district for which a subdivision⁴ application had been made. Cornwall Commons Land Development had requested a zoning amendment in the year 2000, and in February of 2000 the Town of Cornwall Town Board voted to reject the applicant's request zoning amendment. The applicant expressed a desire to proceed with the land use approval and environmental review process according to the then-existing zoning in both municipalities and examining alternative development scenarios. Following this, the Town of Cornwall undertook a Comprehensive Plan, culminating in a 2005 Comprehensive Plan Update that provided specifically for PACs (Planned Adult Communities) in the PRD zone only. This zoning district was adopted in 2005, along with the Table of General Use regulations that, at the time of adoption, included only community and essential services-type uses other than PACs.

² These bonus densities were not enacted.

³ The 1980 Cornwall Zoning Local Law defined a gatehouse or watchman's quarters as a structure for someone to work in, not designed as living quarters. LL1 of 1999 amended this to add, "unless specifically so approved by the Planning Board."

⁴ According to the Cornwall Commons Land Development Lead Agency SEQR Findings Statement adopted April 15, 2002, the DGEIS had indicated that approximately 69 single family detached residential lots could be created in New Windsor. The Findings specifically made no endorsement of accuracy as to the representations of New Windsor zoning capabilities, as that determination would solely be that of the Town of New Windsor Planning Board.

In October 2005, the New Windsor component of the Cornwall Commons land was annexed into the Town of Cornwall into the PRD District, as part of an action annexing other lands into New Windsor. Cornwall Commons received a special use permit from the Town for a Planned Adult Community of 490 age-restricted housing units of three types, and there is a conditional final subdivision approval for a 10-lot subdivision. However, no development has taken place.

The Town of Cornwall Plan Update 2011(adopted March 13, 2012) noted the existence of the PRD District, and that it was the only district in the Town that allowed PACs. That Plan had noted the pressing nature of the regional, if not national economic downturn and the collapse of the housing market, and further noted that several large residential housing projects, including Cornwall Commons, had not progressed to completion because of a lack of a market. Nor did the Update 2011 foresee that there would be a change in the situation any time soon, and it recommended that the Town evaluate its overall Housing Plan in order to better serve the needs of its population. As part of a series of zoning amendments implementing the Update 2011, in 2016 the Town amended the Table of Use Regulations for the PRD District to provide for any lands within a PRD District not developed as or as part of a Planned Adult Community in accordance with Section 158-21X may be developed in accordance with and subject to all requirements of the Table of Use Regulations for the PCD District, and that for such lands the Table of Bulk Requirements for the PCD District shall apply as set forth. The recently adopted Town of Cornwall Comprehensive Plan Update 2019 references this, noting that “where a PAC is not developed, other uses have been provided for within the PRD District, referencing uses in the Planned Commercial Development zoning district, which provides for office, light manufacturing, and planned industrial parks.” Though the 2019 Plan acknowledged the end of the economic downturn, the Land Use Plan encourages commercial growth, among other goals.

Market Conditions for Market-Rate Age Restricted Housing

In 2013, Cornwall Commons requested that the age restriction be eliminated for 78% of the proposed units and to leave 22%(108) units designated for occupancy by one person aged 55 and over. As with the much smaller Canterbury Green project, the PAC does not appear to be marketable for the originally intended and requested purpose. As Cornwall Commons LLC itself had noted, many of the earlier age-restricted developments that were successful had “hit the market at the height of the housing boom and were very successful, like all residential real estate at the time. But during the years that followed, the number of 55+ units built and the number of units in the pipeline, especially in the Northeast and the tri-state area accumulated an enormous backlog.”

The figures below demonstrate the regional condition of the age-restricted housing market in 2012 and most recently, in 2017:

Figure 2: 2012 Multifamily Age Restriction Completions in United States by Region

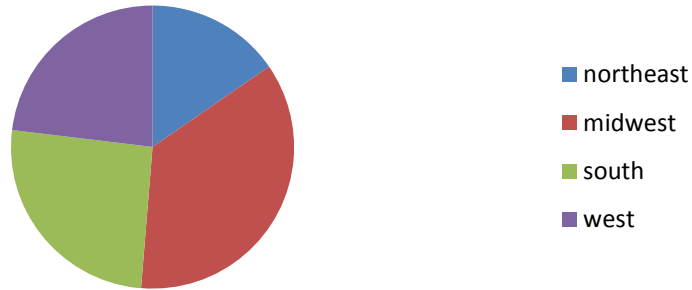
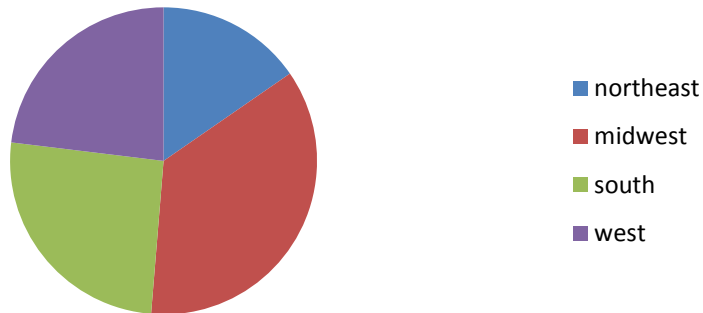


Figure 3: 2017 Multifamily Age Restriction Completions in United States by Region



Data from the National Association of Home Builders, Age-Restricted Housing Index

The NAHB data from 2012 shows that the Northeast produced the least of the four region's percentage of multifamily age-restricted housing, and this remains unchanged in 2017. The percent of age-restricted housing in 2012 was only 6% of the non-age-restricted housing completed in 2012 in the Northeast. In 2017, the percent of age-restricted housing completed in the Northeast remained at only 7% of the total. Except for a brief surge in 2014, where 12% of the housing completed in the Northeast was age-restricted, the Northeast has remained consistently low. In contrast, the Midwest has remained consistently a higher percentage-wise producer of age-restricted units, with 10% or more of its completed housing units being age-restricted for all years since 2011 except for 2015. The South experienced a surge of 10% of its completed housing being age-restricted in 2012, but it has dropped since then.

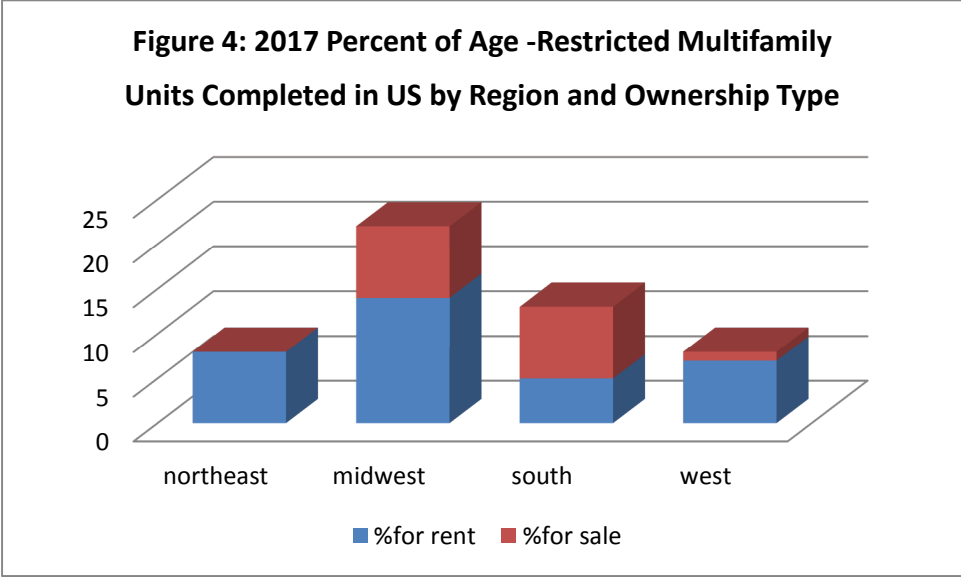


Figure 4 examines the percentage of completed age-restricted units that are rentals and those that are for sale in 2017. In all regions but the South, the age-restricted rental units far outweigh the percentage of units for sale.

Elsewhere in Orange County, there are several market-rate active adult age-restricted housing developments. Still in development is Blackburne Farm Townhomes in Campbell Hall. This is a development of 29 attached homes, and is still selling new homes only, in the low to mid \$400 thousands. Warwick Grove in Warwick, NY is selling both new and resale homes, with condo, townhouse, and single family detached options in the low \$500s to the mid-\$600 thousands. In the Town of Wallkill, Wildflowers at Wallkill is fully completed and sold, with 283 homes that sold from the low \$300s to the mid-\$400 thousands. Kensington Estates in Woodbury is an 80-home project selling new homes only, in the low to high \$1 million price range.

Outside of Orange County, but still in our region is Glassbury Court at Cold Spring, a 90-home development offering new and resale homes from the high \$500s to the low \$700 thousands. The Retreat at Carmel is a 312-home community with new and resale homes from the mid-\$400s to the high \$600 thousands, while Stoneleigh Woods at Carmel is a development of 68 attached homes, with both new and resale units available in the high \$200s to the low \$300 thousands. Regency at Fishkill is a 164-unit condo development selling both new and resale units, in the mid to high \$300 thousands, and Regency at Wappingers is a 225-unit development of attached and single family homes under construction and selling new units only, at prices from the mid \$300s to the mid-\$500 thousands. There are two smaller developments in Clarkstown, Wolfe Landing (43 homes) and Eden Park (34 homes) that are available for resale only, at \$500 thousand and above.

The market-rate active adult communities described above offer several housing types within the County and the wider region, at a wide price range for both new and used units that are available to those seeking such a specialized residential community.

Non-Market-Rate Age Restricted Housing

The Orange County Office for the Aging maintains a list of resources for senior citizens, including a directory of age-restricted housing complexes⁵ within the County, with detailed information on each. Almost all of these units are income-qualified, with the exception of Cornwall's Idlewild Creek Apartments, which currently is renting at market rate, Bluestone Commons, being completed in Maybrook, and Liberty Green II in Warwick. Orange County Office for the Aging has stated that the majority of the calls it receives on housing relate to income-qualified housing for low income seniors, and the Office typically refers them to its housing directory, which is updated yearly. There is sufficient demand for income-qualified housing that there are waiting lists established, often involving a year or two of wait time. However, in the case of a crisis, Office for the Aging will get other agencies involved.

Conclusions and Recommendations

Much has changed since 1980, when the Town of Cornwall originally sought to provide for housing located and designed to meet the needs of older people by establishing zoning provisions for "senior citizen housing areas". Even though the Town established zoning for senior citizen housing areas, it was not until the late 1990s that the first such development, the 214-unit Idlewild Creek Apartments on Canterbury Road, was built. And despite having made special provision in its limited area of GC-districted land within the Town for a senior citizen housing area in 2005, the Canterbury Green project was half completed when its owners requested the Town Board to eliminate the age-restriction, completing the project as an age-restricted development in 2016 when the Town declined to do so.

The prospect of a successful market for a 490-unit Planned Adult Community in the Town of Cornwall appears extremely dim for the foreseeable future. Therefore, the Town should consider eliminating PACs along with the PRD zoning district. It is recommended that upon elimination of the PRD zoning district, the lands currently therein should revert primarily to the underlying PCD mix of uses provided for in 2016. The PCD alternative had been provided for in 2016, and as described in the 2019 Plan, "the PCD District protects lands that are visually sensitive while allowing for a range of limited non-residential uses in a way that is consistent with the Town's conservation goals."

⁵ Including projects with an age-restricted component, such as the Summitfield Apartments in Middletown, 12 of whose units are for senior occupancy.

While there is a need on a countywide basis for income-qualified senior housing areas, the length of time and the extent to which these projects remain affordable is a real concern, and something that the Town should consider going forward. Note that Idlewild Creek Apartments in Cornwall had originally received Low Income Housing Tax Credits. The expiration of those credits will result in a rise in rents and a reduction in affordability, even though the units remain age-restricted.

The Town might also consider whether any cap or ceiling should be set for the number of senior housing areas or units within the town. If Chestnut Woods should be developed, it would add another 180 market rate age-restricted rental units to the Town's existing supply. It is reasonable to question whether another such project would be feasible for the market to support within the Town, in addition to the two existing projects providing 272 market-rate units. Possibly limits might be set on the number of special permits that can be granted within the Town, or the number of units within a given project. At a minimum, the senior housing area should be removed from the GC district.

SOURCES

Orange County Office for the Aging

Town of Cornwall Comprehensive Plan Update 2019, adopted May 22, 2019

Town of Cornwall Comprehensive Development Plan Update 2011, adopted March 13, 2012

Town of Cornwall Comprehensive Development Plan, adopted April 11, 2005

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Chestnut Woods at Cornwall – Lead Agency Written SEQR Findings Statement, adopted by Town of Cornwall Planning Board, February 5, 2007

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Ann Garti, RCE, Chief Operating Officer, Hudson Gateway Association of Realtors: personal communication

