



Lower Connecticut River Valley Council of Governments

145 Dennison Road Essex, CT 06426 | +1 860 581 8554 | www.rivercog.org

March 15, 2021

Senator Steve Cassano, Co-Chair
Representative Cristin McCarthy Vahey, Co-Chair
Planning and Development Committee
Legislative Office Building, Room 2100
Hartford, Connecticut 06106

RE: Proposed H.B. 6611

Dear Co-Chairs Cassano and McCarthy Vahey and Committee Members:

Thank you for the opportunity to comment on HB 6611, An Act Concerning a Needs Assessment and Other Policies Regarding Affordable Housing and Development, which would adopt and implement the Open Communities Alliance's *Fair Share Housing Model for Connecticut, 2020*. That our low-paid service workers are essential to the functioning of all our communities has become clearer than ever during the COVID-19 pandemic. Our essential workers are part of every community and should have access to quality affordable housing in the communities where they work. RiverCOG understands and appreciates that HB 6611 is intended to address this and the larger issue of concentration of poverty in cities and specific census tracts. However, RiverCOG does not believe that the approach outlined in HB 6611 is desirable or balanced, for several reasons.

The approach runs contrary to state efforts to become more sustainable and economically competitive by building vibrant cities that are not car dependent. HB 6611 would undermine these efforts, diverting money from our cities and downtowns. Connecticut's largest cities and many other town and city center census tracts would be ineligible for housing or investment under HB 6611. Transit-oriented development, cohesive communities of color, and rehabilitation of old city centers would all suffer.

Take downtown Middletown, in the Lower Connecticut River Valley Region. Dan Haar recently wrote in *Connecticut Magazine* about Middletown's Main Street as a model for how a "stable, nontransitional, racially and economically integrated commercial neighborhood can succeed." Middletown is a public transportation hub, a center for social services, and a lively and diverse commercial center. Under HB 6611, downtown Middletown census tracts, including the North End neighborhood, would be ineligible for development or investment. These are the very parts of Middletown that the City and RiverCOG are investing in and working to strengthen with a combination of affordable and market-rate housing. HB 6611 would locate new housing developments outside of downtown, in the rural and suburban parts of the city, away from public transit and employment.

Has OCA surveyed or consulted with downtown and North End Middletown residents to find out what they want or need? Some households would definitely welcome access to new affordable housing on the outskirts of the city, but many low-income households might very well prioritize other issues such as quality education, affordable childcare, expanded public transportation, student loan debt relief, and availability of well-paid

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employment. Implementing HB 6611 would cost tens of billions of dollars over ten years, with many of those billions coming from the state and municipalities. Wouldn't it be worthwhile to have a conversation with those we seek to help first?

North End residents might also ask for assistance with maintaining or improving the homes in which they already live. The cheapest housing in the state is typically the most neglected housing. The housing stock in our cities is suffering from deferred maintenance, structural issues, environmental health problems, and energy inefficiency. Rehabilitation of existing housing in our cities is not eligible for state funding under HB 6611.

Our cities are also home to many of the state's immigrant communities, some of which are linguistically isolated. HB 6611 does not recognize the importance of community institutions that are located in the cities. Why should low-income households have to choose between their community and the opportunity to access new quality affordable housing elsewhere?

The Open Communities Alliance (OCA) estimates that HB 6611 would create 300,000 new housing units in Connecticut in the first ten years. This amount of housing would be twice the number of all housing units built in Connecticut in the past twenty years, and comes on the heels of a decade where Connecticut experienced population loss for the first time. If Connecticut's population continues to stagnate or decline, where will the new residents of the newly built 300,000 housing units come from?

Rather than directing investment away from the cities, we need to help the cities regain their fair share of market-rate housing and tax base. According to OCA, half of the housing built under HB 6611 would be market rate, but none of it can be built in the cities that most need investment. Our cities need income diversity to be economically viable. They can't have the population of a city and a grand list of a town. Property tax reform and strong state policies that focus state investment is needed to support cities and encourage employers and wealth to return to them. HB 6611 does not support these goals.

Another approach to creating a more inclusive and fairer Connecticut would be a proposal that estimates the need for low-income housing based on place of employment. Providing opportunities for workers to access housing within the communities in which they work links economic development with affordable housing development. These workers are already spending their days in these towns; they should be welcome to sleep there too. This linkage would also relieve cities from the burden of paying for supportive social services that subsidize low-paying employers located elsewhere.

RiverCOG supports an inclusive Connecticut. Every city and town should have housing for low-income residents, but a program to create such housing can't be based on a one-size fits all formula, and it should not run counter to other Connecticut priorities, such as transit-oriented development and revitalization of our cities. This issue is too important rush.

Please do not hesitate to contact me about RiverCOG's opposition to HB 6611.

Sincerely,



Samuel S. Gold, ACIP
Executive Director