

March 3, 2021

Esteemed Chairs Cohen and Gresko,
Members of the Environment Committee:

The Western Connecticut Council of Government (WestCOG) appreciates the opportunity to comment on *House Bill No. 6441, An Act Concerning Climate Change Adaptation*.

The expansion of the pilot program for stormwater authorities to all municipalities is a solid move, as stormwater – and its environmental impacts – do not respect municipal boundaries. However, with respect to this initiative, WestCOG suggests you consider amending the bill to:

1. **Clarify that a municipal stormwater authority need not be a standalone entity but may operate within an existing municipal department.** Integration of the authority in existing government operations avoids the delays and costs associated with the startup of a new, independent organization and will enable the authority to save on overhead by taking advantage of existing administrative structures, rather than creating ones of its own.
2. **Give authorities flexibility in setting the basis for stormwater fees.** Federal law provides tax deduction for fees that are structured in certain ways (e.g., as an ad valorem tax). Stormwater authorities should have the freedom to develop fee structures that maximize federal tax advantaging, reducing the impact on fee payers and shifting the effective cost from Connecticut property owners to the federal government (ll. 34-45).
3. **Eliminate the stipulation that bars municipalities with inadequate affordable housing from spending the buyer's conveyance tax revenues on creating affordable housing.** The bill allows municipalities to spend the optional buyer's conveyance tax revenues on affordable housing (ll. 121-123), *except* those that the Commissioner of Housing deems not to have an adequate supply of affordable housing. For these municipalities, the bill limits use of tax revenues to a Climate Change and Coastal Resiliency Fund (ll. 127-134). The bill should be amended to allow these municipalities to the expend such revenues on the expansion of affordable housing (as defined by CGS §8-30g), including the acquisition of buildings and land for, and the construction and rehabilitation of, affordable housing.

Should you have questions, please do not hesitate to contact me.

Thank you for your consideration.



Francis R. Pickering
Executive Director