



Creating Great Communities For All

Connecticut Chapter of the American Planning Association

**Testimony regarding
Proposed Bill No. 5683 – AN ACT CONCERNING AFFORDABLE HOUSING**

CCAPA supports the intent of this Proposed Bill, but has some concerns regarding implementation and tracking. This bill would amend **CGS §8-3g, adding a new item 6 to Subsection k** that allows for including what is commonly referred to as “naturally-occurring affordable housing” to a community’s documented affordable housing unit supply under the Affordable Housing Appeals Statute (8-30g). Home-ownership units that are not deed-restricted, but meet the 80% of medium income sales price, would therefore be counted towards a municipality’s 10% affordable unit requirement. CCAPA supports affordable housing of all types and recognizes that there is an uncounted quantity of affordable housing units (both rental and for sale) within communities that provide housing to groups that represent the workforce income levels targeted by the statute.

However, CCAPA raises the following concerns regarding the proposed language of the bill and its lack of specificity:

- The mechanism for determining units suggests utilizing local assessor information annually to count the portion of home-ownership properties that may meet the sales criteria intended for 80% of median income households, but this Assessor’s data may only be updated every 5 years per state statute. Should this be a 5-year calculation in cycle with the Assessor’s revaluation process?
- Units “capable of purchase by persons or families whose annual income is eighty per cent of the area median income” may not actually be purchased by persons who meet that income category. Depending on the marketplace, well-financed builders or flippers may purchase lower-priced ownership opportunities that are then sold for significantly above what may be deemed an “affordable” price for income-eligible households. These units may not actually provide affordable housing to those who need it.
- Similar to the above and as well-documented in the pandemic, real estate pricing can fluctuate greatly based on increased market demand- even within a single calendar year.
- All of the foregoing create a substantial logistical and documentation burden on a municipality.

CCAPA supports the Proposed Bill, but suggests that some additional discussion may be required to work out the mechanics of implementation. As CCAPA represents municipal professional and technical staff who are often involved in affordable housing tracking and proposed 8-30 g projects, we would welcome being part of an effort to determine how this legislation might be more fully developed.

WHO WE ARE

The Connecticut Chapter of the American Planning Association (CCAPA) has over 420 members who are governmental and consulting planners, land use attorneys, citizen planners, and other professionals engaged in planning and managing land use, economic development, housing, transportation, and conservation for local, regional, and State governments, private businesses and other entities. CCAPA has long been committed to assisting the legislature and State agencies with developing and furthering responsible growth management principles. The APA is an independent, not-for-profit, national educational organization that provides leadership in the development of vital communities.

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