

Three points in opposition to SB1024:

1. Excessive training requirements - one DesegregateCT web page claimed that 'states across the country' require training of municipal boards and commissions. I checked their reference article and listed states' regulations and found none of those states require more than 4 hours annually. Unpaid volunteers doing community service fill boards and commissions in Connecticut. Some towns have difficulty keeping the boards filled and a requirement of 6 hours of annual training will not help. And if a board has members who fall short of the 6 hours in a year, they cannot vote. Short of a quorum, what happens next? Automatic approval, as in site plan reviews. Is this another unfunded mandate?

2. Circles and zoning do not go well together. A radius of a half mile from a train station that sits on a rectangular lot does not result in a circle. *What is the intent?* If it is to allow 8-30g housing in Industrial Districts, then say so. If not, then exclude Industrial zones from the radius. Lot lines are straighter and more angular than any radius. If such a half mile radius captured a portion of a lot, is the entire lot affected (as on flood maps)? And if a lot in that radius is zoned Industrial, this then would put residential uses in an Industrial district. And, since all properties in a district must be regulated in the same manner, then all Industrial districts must allow residential uses - even if far outside the radius. IANAL, but courts have held that Industrial Districts are not subject to 8-30g appeals - BUT if residential uses are allowed in Industrial districts because a portion of a lot is inside the radius, then will all Industrial districts allow 8-30g appeals?

3. By what metric will the success of this Bill be judged? More housing built, maybe denser housing than before but it may not result in more **affordable** housing. Old Saybrook's TOD Incentive Housing Development of 186 units included (38) affordable units at 20%. Under this Bill, the yield would be only 10% affordable units. Recent local 8-30g developments of fewer than 10 units yielded 30% of them as affordable units. Developed under this Bill, the yield would be zero. If a town is not at 10% of its dwellings fitting the State's definition of affordable, building new at a rate of 10% will not get it there.

If CT's shrinking population cannot afford to re-distribute itself to the newly built housing, is that success?

One size does not fit most.

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