

March 2, 2022

Esteemed Chairs Lopes and Williams,
Members of the Housing Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Senate Bill 169, *An Act Concerning a Study of the Effects of Affordable Housing Policies in the State*.

The bill limits study of “affordable housing policies” to “section 8-30g of the general statutes.” While the Affordable Housing Land Use Appeals framework codified in §8-30g is an affordable housing policy, it is not the only state policy that influences housing affordability – for starters, so, too, do the State Building Code, state housing assistance programs, and state laws on taxation – nor does it address all aspects of housing affordability.

Robert Dietz, the Chief Economist of the National Association of Home Builders, has identified five “Ls” that are limiting factors when it comes to homebuilding and consequently influence home prices. These are labor, lots, laws, lending, and lumber. At most, CGS §8-30g addresses two of these items, and then only at the local level.

§8-30g is also incomplete in its consideration of the factors that influence the affordability of finding and keeping a home (and thus household finances). For instance, the law does not adequately address the following:

- Deposits and down payments/closing costs are often the principal financial barriers to a household finding a home.
- Home payments, taxes, insurance, and utilities are included, but maintenance is not. Maintenance needs can vary dramatically by home and may be substantially higher on lower-cost homes.
- As the “drive till you qualify” phenomenon makes clear, where housing costs are low, household transportation costs – generally a household’s second largest expenditure – tend to be high, and vice-versa. Because of this, housing and transportation are now often added together in determining household housing burden. (See [H+T Index](#).)

A study that is limited solely to CGS §8-30 and does not consider the full range of factors that influence home affordability, and in many cases may do so more significantly than it does, misses the forest for the trees.

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

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a long horizontal stroke at the bottom.

Francis R. Pickering
Executive Director