

Western Connecticut COUNCIL OF GOVERNMENTS



January 30, 2023

Esteemed Chairs Luxenberg and Moore,
Members of the Housing Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Senate Bill 907, *An Act Concerning Fair Rent Commissions*. SB 907 would expand the requirement created by Public Act 22-30 for local fair rent commissions from municipalities with at least 25,000 residents down to those with at least 10,000 residents. WestCOG **opposes** such an expansion as premature:

- There is insufficient data to determine whether PA 22-30 is performing as intended and producing better outcomes. Mandatory commissions under PA 22-30 have yet to be set up in many municipalities (under the Act they must be adopted by July 1, 2023); and in those where they have been created, they have had few if any meetings to date.
- There is insufficient data to quantify the costs of running a commission. State law endows commissions with powers to compel to appearance and testimony, to issue subpoenas, and to intervene in contracts between private parties, but it does not require their members to have training or certification, nor does it indemnify or protect municipalities from the consequences of their actions. Accordingly, municipalities may provide legal counsel in addition to administrative staff to commissions – which may create significant expense. Given that commissions are largely still forming, it is not possible to quantify this expense. (Note that such costs may not scale linearly with population and may be disproportionate in smaller towns.)
- There is insufficient data to determine whether the option for joint fair rent commissions, which PA 22-30 enables for municipalities of under 25,000 residents, is not working. Smaller towns may have eschewed standalone fair rent commissions due to cost concerns. Joint or regional commissions may spread costs across a larger base and should be given an opportunity to succeed.

WestCOG suggests that a prudent approach may be to direct an evaluation of the performance and impacts of the commissions required under PA 22-30 and base legislative action on the findings of that analysis. 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 R. Pickering".

Francis R. Pickering
Executive Director