

February 20, 2024

Esteemed Chairs Kavros Degraw and Rahman,
Members of the Planning and Development Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 5174, *An Act Concerning Temporary Shelter Units for Persons Experiencing Homelessness Located on Real Property Owned by Religious Organizations*.

WestCOG does not have a position on temporary shelter units but has concerns with how the bill would enable them. The bill only gives municipalities authority over a shortlist of subjects – meaning that a municipality would have no authority over any subject not on the list, no matter how important that subject is. The problem with such an approach is that it cannot encompass every situation that might arise. For instance, the bill does not address:

1. **Food preparation and storage facilities.** The bill does provide for municipalities to require areas for the residents of the temporary shelter units to prepare, consume, or store food. Is the expectation that the residents would be fed at all meals by the religious organization at a separate location?
2. **Sanitary facilities.** The bill does provide for municipalities to require sinks (or bathtubs). Where are residents expected to wash their hands and clean or bathe children who are too young for showers?
3. **Utility connections.** The bill would prohibit the treatment of temporary shelter units as a new residential use, including requiring new water or wastewater connections. However, the bill would not limit the placement of units to sites that already have utilities with adequate capacity: they could be placed on any real property a religious organization owns. This could be at a church or temple with inadequate water or wastewater service for such residential use, or it could be on an undeveloped parcel. How would a municipality ensure that the units have adequate provision for safe drinking water and wastewater disposal if the municipality cannot require the installation of utilities – whether public water or well, public sewer or septic system – to meet those needs?
4. **Solid waste.** Under the bill, more than forty persons could live on a single lot. Together, such a group could produce between 100 and 200 pounds of solid waste daily – potentially over 1,000 pounds per week. However, the bill does not provide for municipalities to ensure the orderly collection and removal of this waste. What is the expectation of how temporary shelter units would address waste?

This list is not intended to be exhaustive but only to illustrate that bona fide concerns may arise based on local conditions, and that flexibility to address these conditions is needed.

Should you have questions or require additional information, please do not hesitate to contact me.
Thank you for your consideration.

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Francis R. Pickering
Executive Director