

Western Connecticut COUNCIL OF GOVERNMENTS



March 4, 2024

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

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 5336, *An Act Implementing the Recommendations of the Connecticut Housing and Segregation Study*.

WestCOG **opposes** this bill due to the inappropriate inclusion of “fair share” in Section 3.

The Office of Policy and Management is studying “fair share”. This study is not yet complete; furthermore, it would be premature to direct the Department of Housing to apply “fair share” allocations when a) the state has not completed its study, b) those allocations have not been determined, and c) the state has not enacted fair share. Furthermore, given the history of fair share – in its nearly fifty years of existence, it has only been adopted by one state, and in that state its performance has been dubious – it is unclear that it will be adopted by Connecticut.

Use of fair share in the creation of a qualified allocation plan for Low-Income Housing Tax Credits risks decreasing, not increasing, the number of housing units that are built under these valuable federal credits. The reason for this is simple: fair share does not reflect the need or demand for affordable housing, but instead seeks to spread housing around the state, even and especially to areas where there is little demand for new housing. **Using fair share in the qualified allocation plan will send valuable federal tax credits to areas where housing demand is not high – creating a mismatch between where housing is needed and where the state will support its construction and potentially stranding these credits.**

There may be opportunity to improve the qualified allocation plan. Such improvements, however, should reflect actual need and demand, as well as ability to deliver and collateral benefits (e.g., reduction in household transportation costs by locating in a transit-oriented development), rather than arbitrary notions about what a “fair share” is.

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".

Francis R. Pickering
Executive Director