

March 2, 2026

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

On behalf of the Western Connecticut Council of Governments (WestCOG), I would like to thank the Committee for its thoughtful work in proposing additional affordability gradations within CGS §8-30g's housing unit-equivalent (HUE) point system, as expressed in Raised Bill 5365, *An Act Increasing Certain Housing Unit-Equivalent Points*.

Adding more tiers to §8-30g is a constructive and forward-looking step. A more graduated scoring structure recognizes that housing need exists along a spectrum and that the statute should reflect that reality. Strengthening proportionality within the HUE schedule makes the framework more precise, more modern, and more responsive to actual housing conditions in Connecticut.

Expanding affordability tiers acknowledges that deeper affordability should receive proportionally greater recognition. Housing serving extremely low-income households presents the most significant financing challenges and addresses the most acute need in the state. Providing distinct recognition for that depth of affordability strengthens—not weakens—the statute's purpose.

At the same time, our nation's housing pressures extend beyond the lowest income bands. Seniors on fixed incomes, young workers forming households, service employees, and middle-class families are increasingly priced out of many communities. Construction costs have risen, and in many markets housing affordable to working households now requires public support or regulatory accommodation to be delivered at all. Given this, your Committee may wish to consider extending the logic of gradation further so that §8-30g reflects the full continuum of affordability needs, from extremely low-income households to moderate-income workforce families.

A more nuanced scoring ladder does not reduce housing production. It expands housing options and increases the number of financially viable proposals that can move forward. By allowing projects to combine units at varying income levels, tailored to local demographic and market conditions, the statute becomes more flexible without altering its enforcement structure. The moratorium thresholds, the 10% exemption standard, and the appeals framework remain unchanged. What changes is the statute's ability to recognize a broader array of meaningful housing outcomes.

We also encourage consideration of refining the treatment of age-restricted housing so that points scale proportionally with affordability, rather than remaining capped at a flat level. Such an approach would preserve the statute's continued emphasis on family housing while encouraging the production of appropriately affordable senior units—supporting downsizing options and helping free larger homes for growing families.

The Committee's effort to introduce nuance into §8-30g is a positive development. With careful refinement, these adjustments can help deliver more housing options across income ranges while preserving the integrity and effectiveness of Connecticut's affordable housing framework.

For your reference, we have attached as an appendix two conceptual proposals that illustrate how the graduated structure could be further enhanced. We offer these ideas in the spirit of collaboration and continued improvement. Thank you for your leadership on this important issue. We would welcome the opportunity to discuss these concepts further.

Sincerely,

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

Francis R. Pickering
Executive Director

I. CONCEPT: DEEPLY AFFORDABLE AND WORKFORCE HOUSING TIERS

§8-30g awards same number of housing unit equivalent (HUE) points for any unit affordable at or below 40% of median income (MI) but offers no extra credit for deeper affordability. A unit restricted to 20% of MI earns the same points as one at 40%, despite serving a more vulnerable household. At the same time, units affordable above 80% MI receive no credit at all—even though, because construction costs have grown faster than incomes, housing affordable to 100% MI households is now *below market rate* and cannot be built without assistance, despite §8-30g’s purpose of encouraging municipalities to support below-market housing.

These problems can be solved by adding lower—and higher—point tiers. This proposal, which is shown in the table below, awards bonus points for units at or below 20% of MI, recognizing extremely low-income housing as a distinct need. It also grants partial credit for units between 80–120% of MI, aligning the statute with state-supported initiatives like Build CT that help finance moderate-income housing. Together, these changes modernize §8-30g to reflect the full spectrum of affordability without rewriting its core structure.

Income Limit	Current Points/Unit	Adjustment	New Points/Unit
≤20%	2.0 /2.5 (<i>same as ≤40%</i>)	+0.5 from ≤40% level	2.5/3.0
≤40%	2.0/2.5	—	2.0/2.5
≤60%	1.5/2.0	—	1.5/2.0
≤80%	1.0/1.5	—	1.0/1.5
≤100%	0.0/0.0 (<i>currently ineligible</i>)	-0.5 from ≤80% level	0.5/1.0
≤120%	0.0/0.0 (<i>currently ineligible</i>)	-1.0 from ≤80% level	0.25*/0.5
No cap (market-rate)	0.25/0.25	—	0.25/0.25

Point values are for rented/owned units.

* The existing floor of 0.25 points per market-rate unit would apply here.

Why it matters:

- Extremely low-income households are not addressed by §8-30g. Giving extra credit for ≤ 20% MI units aligns the state’s existing affordable housing framework with the state’s deepest need—closing a gap that §8-30g has left unaddressed since 1990.
- The middle-income “Build CT” program finances developments that reserve at least 20% of units for households earning 60–120% MI. The revised schedule awards points—albeit fewer—for 80-120% MI units, so Build CT projects become eligible.

II. CONCEPT: INCOME-PROPORTIONAL SENIOR HOUSING TIERS

§8-30g assigns 0.5 HUE points to senior units affordable at or below 80% of MI, regardless of how affordable they are. A senior rental unit at 80% MI earns the same as one at 40% MI. This ceiling discourages the creation of deeply affordable senior housing, even though seniors often need units priced well below 60% MI.

Replacing the 0.5-point ceiling with a simple deduction of 0.5 points from whatever a unit would otherwise earn, while preserving the floor of 0.25 points per unit would reward deeper levels of affordability in age-restricted projects, while still limiting the credit for senior housing relative to unrestricted housing but rewards. This change preserves the intent of prioritizing family housing while giving communities a real incentive to support meaningful senior downsizing options that can free up larger homes.

Income Limit	Current Points/Unit (Age-restricted)	New Points/Unit (Proposal #2 above)	Minus 0.5 Points for Age-restricted
≤20%	0.5	2.5/3.0	2.0/ 2.5
≤40%	0.5	2.0/2.5	1.5/ 2.0
≤60%	0.5	1.5/2.0	1.0/ 1.5
≤80%	0.5	1.0/1.5	0.5/ 1.0
≤100%	0.25*	0.5/1.0	0.25/0.5
≤120%	0.25*	0.25/0.5	0.25/0.25

* The existing floor of 0.25 points per market-rate unit would apply here.