Western Connecticut
COUNCIL OF GOVERNMENTS

February 27, 2026

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

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 5281, *An Act Concerning Planning and Development.*

Raised Bill 5281 clarifies the timing of publication for planning commission actions under CGS §8-28. WestCOG recently submitted testimony on Raised Bill 5289 regarding modernization of municipal legal notice requirements. We incorporate those comments by reference and reiterate our strong support for allowing municipalities to satisfy statutory notice requirements through online publication rather than mandatory newspaper publication.

If the Committee is revisiting §8-28, this presents an opportunity not only to clarify publication timing, but also to modernize Connecticut's land use administration in a way that improves transparency, reduces long-term public cost, strengthens legal defensibility, and enhances the quality of municipal data.

I. PRESERVING AND REUSING HIGH-VALUE GEOSPATIAL INFORMATION

Connecticut invests substantial private and public resources in the preparation of land surveys, subdivision maps, site plans, grading plans, and building plans. These documents are typically prepared in sophisticated digital formats using CAD and GIS software. Yet municipalities are often required to accept these materials in printed form, only to scan or manually digitize them later. This process degrades precision, introduces cumulative error, and wastes the value of survey-grade information that has already been produced at considerable cost.

WestCOG respectfully recommends that the Committee authorize municipalities—on a permissive basis—to require that land use applications, including surveys, subdivision maps, site plans, and building plans, be submitted in their original digital formats rather than solely as printed copies or rasterized PDFs. By allowing native digital files to enter municipal systems directly, the state ensures that high-precision data is preserved rather than degraded through outdated paper workflows. This prevents long-term "data decay" and allows the valuable professional work performed by applicants to strengthen municipal datasets over time.

II. IMPROVING PARCEL MAPPING AND TAX ASSESSMENT ACCURACY

Digitally submitted boundary surveys and subdivision maps can be directly integrated into municipal parcel datasets. This enables:

- Updating lot lines based on current certified survey data;
- Resolving long-standing boundary inconsistencies;
- Improving acreage calculations; and
- Aligning planning records with assessor databases.

Over time, continuous integration of survey-grade information improves parcel geometry across the municipality. More accurate parcel data supports equitable tax assessment, reduces boundary disputes, and strengthens long-term land use analysis. Absent digital submission, municipalities must either manually digitize paper plans—introducing distortion and transcription error—or commission costly re-surveying to obtain data that already exists in precise digital form.

III. STRENGTHENING INFRASTRUCTURE, STORMWATER, AND ENVIRONMENTAL COMPLIANCE

Digital building plans and site layouts can also update planimetric and infrastructure datasets, including:

- Building footprints;
- Impervious surface coverage;
- Driveways and parking areas;
- Stormwater systems; and
- Utility connections.

This has important regulatory implications. Accurate impervious surface data supports compliance with MS4 stormwater mandates, TMDL implementation, and state and federal water quality requirements. More precise datasets improve floodplain modeling and Community Rating System scoring under the National Flood Insurance Program, potentially lowering flood insurance premiums for residents. By enabling reuse of existing digital data, municipalities can reduce compliance risk under environmental mandates while avoiding redundant digitization costs.

IV. ENHANCING EMERGENCY RESPONSE AND PUBLIC SAFETY

Accurate building footprints and site layouts also support public safety functions, including:

- Fire pre-incident planning;
- Hydrant and access mapping;
- 911 GIS integration; and
- Emergency evacuation modeling.

Digital precision improves response planning and reduces reliance on outdated or approximate mapping layers. In an era of increasingly complex development and climate-related hazards, high-quality spatial data is a public safety asset.

V. REDUCING ERROR, LITIGATION RISK, AND ADMINISTRATIVE BURDEN

Manual digitization of printed plans introduces geometric distortion and cumulative inaccuracy. Native digital files preserve coordinate systems, metadata, authorship information, and time stamps, strengthening evidentiary reliability. Clear digital records also improve the integrity of the administrative record in the event of an appeal. A complete, precise digital record reduces disputes over legibility, completeness, and transcription error. Digital submission further reduces staff time devoted to scanning, tracing, and data cleanup, lowering long-term administrative costs and decreasing reliance on outside consultants to reconcile inconsistent datasets.

VI. SUPPORTING CAPITAL PLANNING AND ASSET MANAGEMENT

Improved digital datasets support broader municipal functions, including:

- Pavement and sidewalk inventory management;
- ADA compliance tracking;
- Utility asset management;
- Capital improvement programming; and
- Long-term infrastructure investment planning.

By allowing original digital files to inform municipal GIS systems, the state strengthens coordination across planning, engineering, assessment, and public works functions.

VII. ENHANCING TRANSPARENCY AND PUBLIC ACCESS

Digital workflows also enhance transparency. When planning commission notices are posted online, municipalities can provide direct access to complete digital application materials—maps, plans, and supporting documents—without requiring in-person inspection at city or town hall. This expands meaningful public participation, reduces reproduction burdens, and strengthens archival permanence. Native digital files create durable, searchable records that are resilient to physical loss from fire, flood, or other disaster.

VIII. CLARIFYING LEGAL AUTHORITY (PERMISSIVE, NOT MANDATORY)

Many municipalities are already moving toward digital workflows, but uncertainty remains regarding their authority to require submission in original digital formats. WestCOG recommends clarifying that municipalities may, at their discretion, require digital submission of land use materials in usable formats. This authority should be permissive, not mandatory. Municipalities should be able to phase implementation based on local capacity and infrastructure. No specific software platform need be prescribed. The statute would simply authorize municipalities to receive in usable digital form materials that are already created digitally.

IX. CONCLUSION

Raised Bill 5281 provides an opportunity to modernize Connecticut's land use statutes in a measured and practical manner. In addition to clarifying publication timing and supporting online notice modernization (as addressed in our prior testimony on Raised Bill 5289), the General Assembly can:

- Preserve and reuse high-value geospatial information;
- Improve parcel map accuracy and tax equity;
- Strengthen stormwater and floodplain compliance;
- Enhance emergency response mapping;
- Reduce litigation risk;
- Improve administrative efficiency; and
- Lower long-term public cost.

By enabling digital workflows, the state ensures that the substantial professional effort invested in land use applications strengthens municipal data systems rather than being diminished through outdated paper processes. WestCOG respectfully urges the Committee to consider these refinements and stands ready to assist in developing clarifying language.

Thank you for your consideration.

Sincerely,

Francis R. Pickering
Executive Director