

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 provide comments on Raised Bill No. 5395, *An Act Concerning Modular or Prefabricated Homes*. My comments concern Section 1(b) of the bill. I do not take a position on the housing unit-equivalent provisions in Section 2. As drafted, Section 1(b) would require zoning regulations to “allow for the as-of-right development of a modular or prefabricated home on any lot that allows for use as a single-family residence.”

This language appears to create an unintended procedural advantage for modular homes relative to site-built homes. In doing so, it risks placing Connecticut’s on-site construction workforce at a competitive disadvantage without any clearly articulated state policy justification. Unlike site-built homes, which are constructed primarily by Connecticut-based contractors and tradespeople, modular homes are frequently manufactured out of state. Granting modular homes a more favorable zoning approval pathway than homes built on site would tilt the regulatory playing field in favor of an out-of-state manufacturing model over in-state labor.

There is no rational state interest in privileging one lawful construction method over another in this manner. If the objective of the legislation is to prevent discrimination against modular homes, that goal can be achieved through parity. It does not require procedural elevation.

The issue arises because the bill mandates “as-of-right” treatment in any zoning district where single-family homes are allowed in any capacity. In some districts across the state, including certain mixed-use, commercial, industrial, and special-purpose zones, single-family homes may be permitted by special permit or special exception. Under the bill’s current wording, modular homes would have to be permitted as-of-right in those districts, even where site-built homes remain subject to discretionary review. This creates a disparity based on construction method within the zoning framework established under CGS §8-2.

If the Committee’s intent is to ensure that modular homes are not treated more restrictively than site-built homes, that objective can be accomplished without creating a regulatory preference. The statute should make clear that modular and site-built homes are subject to the same procedural treatment within a given zoning district — neither advantaged nor disadvantaged. Accordingly, I respectfully suggest that Section 1(b) be revised to provide:

“Any zoning regulations adopted pursuant to section 8-2 of the general statutes shall not require a modular or prefabricated home to undergo a more restrictive zoning approval process than a site-built single-family residence in the same zoning district.”

Alternatively:

“Modular or prefabricated homes shall be permitted on the same procedural basis as site-built single-family residences in the applicable zoning district.”

Such language would ensure a level regulatory playing field, avoid unintended economic distortion, and support the construction workforce in Connecticut.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is written in a cursive style with a prominent horizontal line under the name.

Francis R. Pickering
Executive Director