HOME BUILDERS ASSOCIATION OF CONNECTICUT, INC.
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Your Home Is Our Business

March 3, 2008

To: Senator Eric Coleman, Co-Chairman
Representative Art Feltman, Co-Chairman
Members of the Planning & Development Committee

From: Bill Ethier, Executive Vice President & General Counsel

Re: **Raised Bill 5674, AAC the Powers of Regional Councils of Government**

The HBACT is a professional trade association with over one thousand five hundred (1,500+) member firms statewide employing tens of thousands of Connecticut's citizens. Our members are residential and commercial builders, land developers, remodelers, subcontractors, suppliers and those businesses and professionals providing services to this diverse industry. We also created and administer the CT Developers Council, a professional forum for the land development industry in the state.

The HBA of Connecticut opposes RB 5674. The bill authorizes RPOs to levy and collect new taxes without any corresponding decrease in local or state taxes. This will only increase the overall tax burden faced by CT's citizens and businesses.

The bill also authorizes RPOs to exercise "such powers as it deems necessary to encourage intermunicipal cooperation and decisions and regional solutions to problems shared by its members." With such broad and open-ended authority, accompanied by the authority to levy taxes, this bill essentially creates a third layer of government, without any corresponding reduction in state or local government.

We respectfully suggest that a regional layer of government should not be created without also eliminating either state or local functions that would be handled at the regional level. All stakeholders need to figure out what governmental functions should be handled at the local, regional or state levels. Our laws and regulations should then be designed to avoid duplication of effort. We are open to considering identified governmental functions that might best be carried out at a regional level, but only to the extent such functions or authority are removed from the local and state levels of government. It may very well be that the most appropriate role for RPOs is to not serve in a governmental capacity at all, particularly in such a small state as Connecticut, but to provide technical services to local governments and to serve as a venue for local governments to discuss and jointly work on common issues.

Thank you for the opportunity to comment on this important legislation.