

Julia Pemberton  
First Selectman



Phone: 203-938-2002  
Fax: 203-938-8816

## Town of Redding

February 5, 2015

Dear Vice-Chairman Butler and Vice-Chairman Winfield, Ranking Members Brenda Kupchick and Tony Hwang, and Members of the Committee,

Thank you for the opportunity to submit testimony today on behalf of the citizens of Redding, regarding the inadequacies in the existing affordable housing law under 8-30g and the legislative remedies before you for consideration.

While the intent of the 8-30 G appeals process is well intended, its structure and application have significant problems for a municipality such as ours.

In brief, Redding encompasses 32 sq. miles of hilly, ledge-strewn terrain. Fully 89% of our acreage lies within the watersheds for the three principal tributaries feeding the Saugatuck and Aspetuck Reservoirs. These supply most of the drinking water for the large coastal communities to our south. In addition, our difficult topography makes sewer systems non-viable except in the southwest corner of our town. Redding is thus the steward of significant watershed land, sensitive to development and largely unsuitable for large-scale development.

We are caught therefore in a bind between the one-size fits all mandate under 8-30g to permit affordable housing as part of larger developments, and our role as watershed stewards. Nevertheless, we have proactively endeavored to fulfill the goals of the affordable housing imperative by creating Incentive Housing Zones in suitable areas of town where the watershed is not threatened, and where residents of such affordable housing would have access to mass transit, shopping and other amenities as recommended by State affordable housing guidelines. The State has approved our IHZ plan, and we are moving forward to create attractive, fully affordable developments at the two viable sites in town.

We find that there are the following general areas of inadequacy under current 8-30g legislation that should be recognized and changed.

1. Moratoria - Allow for moratoria on 8-30g appeals so long as a municipality is making good faith, measurable progress in enabling, planning and developing affordable housing.

We therefore support bills 123, 5802, 5803, 6128, 6135 and 6145

2. Greater Affordable Contribution - Recognition that developers who build affordable units as part of the 8-30g appeals outcome are not appreciably helping towns to reach the 10% affordable housing threshold since many more new non-affordable units are being created at the same time, diluting the improvement in the affordability ratio in a town. Thus the current law really is more an encouragement of haphazard development that violates carefully considered planning efforts by towns, derived from the State's own plan of conservation and development. We recommend that the percentage of affordable units required to be built as part of an 8-30g appeal be significantly increased.

We therefore support bills 5254, 5306, 5579 and 6127

100 Hill Road, PO Box 1028, Redding, CT 06875  
[www.townofreddingct.org](http://www.townofreddingct.org)

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3. Definition Expansion - Rational expansion of the definition of what constitutes an affordable unit both in terms of configuration and deed restriction. For instance, currently an affordable attached apartment must have a door communicating with the rest of the attached house, which does not make sense if one is renting to a non-family member. Also, a square footage calculation could be used as an alternative to a deed restriction as a means of defining what effectively constitutes a permanently affordable unit. If these definitions were expanded in a flexible manner that gave Redding proper credit for its legitimate affordable housing stock, we would see new recognition of approximately 452 apartments/units total, including 239 detached units (usually part of a garage, barn or stand-alone unit/dwelling), 52 two-family structures for 104 units, 3 three-family dwellings for 6 units and 103 attached accessory apartments. This would mean we would be at approximately 14% affordable housing units.

We therefore support bills 407, 5055, 5582, 5803, 6128, 6129, 6130, 6131 and 6139

4. Costly Unique Factors Recognition that all municipalities are not created equal in their ability to support the sort of development that was envisioned by the current appeals act, and that physical limitations may unduly burden certain communities in responding to and defending against inappropriately sized or sited developments pushed forward under 8-30g.

We therefore support bills 5577, 5581, 6126 and 6140

5. Support - In addition, for towns like ours, who have chosen to be pro-active in enabling, planning and eventually developing fully affordable developments, there should be State support in the form of subsidies to offset the cost of our good-faith efforts to support and supply affordable housing in our midst.

We therefore support bill 171.

In conclusion, Redding applauds the effort to provide affordable housing both in our town and Statewide, but we see the need to more correctly take into account existing affordable housing, and unique local burdens. It is wrong to allow a statute with the intent of supplying affordable housing for those in need, to instead be seen as a vehicle for developers to bypass all planning efforts by making a token gesture of creating a few affordable units here and there.

It is also wrong to let the implication stand that communities engaged in thoughtful planning are merely engaged in exclusionary practices. In Redding, where we value and very much need a diverse community, the opposite is true.

Respectfully submitted,

Julia Pemberton  
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