

March 4, 2021

Esteemed Chair Lemar, Vice Chairs Cassano and Simms,
Members of the Transportation Committee:

The Western Connecticut Council of Government (WestCOG) appreciates the opportunity to comment on House Bill No. 6570, *An Act Concerning Transit-Oriented Development and Municipal Zoning*.

With respect to the provisions of the bill:

1. Use station area redevelopment to meet unmet parking needs

In 2019, WestCOG led a study of rail station parking needs in southwestern Connecticut¹. During normal times, parking demand at New Haven Line stations far exceeds supply, resulting in multi-year wait lists for parking permits. The New Haven Line (NHL) is the economic backbone of the region, and the lack of adequate parking at these stations limits the ability of the region to continue to grow. Transit-oriented development (TOD) can reduce the demand for new parking, but even under the most optimistic TOD scenario, the majority of homes in NHL municipalities will continue to be beyond walking distance, and residents will need access to rail station parking.

If growth is to continue, not just around train stations, but across the region, adequate provision of park and ride facilities will need to be part of the conversation. Study findings suggest that user fees (parking passes and permits), if appropriately priced, may be able to support needed capacity expansions.

WestCOG urges the Transportation Committee to go beyond preservation of existing capacity and consider opportunities for addressing unmet parking needs as a part of any station area redevelopment.

2. Consider and design projects around household transportation needs

Transportation costs are often overlooked in the context of household budgets. The result of this is the “drive until you qualify” phenomenon, where low home prices are offset by high transportation costs (both in time and money). The H+T Index², which replaces the traditional marker of household burden (30% of household income spent on housing) with one that combines housing and transportation costs (45% of household income spent on housing and transportation). This approach avoids cost surprises that can make or break a household budget and, also, recognizes the trade-off between housing and transportation: for instance, when a household’s transportation costs are low, it can afford to pay a little more for housing (and vice-versa).

¹ <https://westcog.org/wp-content/uploads/2019/07/Station-Parking-Econ-Analysis-Final-1.pdf>

² <https://htaindex.cnt.org/>

TOD, which *can* reduce the need for a household to own and pay for one (or more) cars, *can* reduce financial burdens on households. However, these savings only materialize when residents use the “T” that is in a TOD. A TOD built around transit services that resident households do not use does not reduce those households’ costs.

The economic characteristics of commuter rail riders differ from those of average drivers and bus riders. Commuter rail riders tend to have substantially higher incomes; given the high cost of commuting by rail (both in ticket prices and time), this may not be a surprise. Few jobs pay enough to cover the cost of Metro-North fares and 2-3 hours a day traveling.

Any station area redevelopment that includes affordable housing units but that does not consider the transportation needs of the residents of those units – it should not be assumed that they will commute to midtown Manhattan – risks creating an empty promise of affordability once household transportation costs are factored in, undermining affordability and the ultimate success of the TOD.

WestCOG urges the Transportation Committee to ensure that any state-led TOD effort follow the example of the H+T Index and evaluate housing *and* transportation needs and estimate housing *and* transportation costs in affordability determinations.

3. **Fix what is broken, not what works**

Numerous locally-led TODs are under way in southwestern Connecticut. While these projects may not get a lot of press, their success speaks to the desire of and residents to grow the region in an environmentally sustainable, socially equitable way, and to the fact that participatory decision-making and grassroots democracy are not an impediment to but in fact have been key to the success of denser and transit-supportive developments. **Western Connecticut, which is home to 16% of the state’s population, accounts for 39% of all new multifamily housing built in the state over the last decade.** Given the number of projects under development, and the engagement of the region in advancing TOD, WestCOG is confident that the region will continue to press ahead with TOD and with broadening the diversity of the housing stock.

That said, if these projects are to create a transit-based future, these local initiatives will need to be supported by state action – which is not currently the case. TODs only work if there are jobs to take the train or bus to. Without that, TOD residents will jump in their cars and drive to suburban employment. Unfortunately, few station areas in Connecticut have concentrations of employment, and municipalities lack the authority to steer job creation to station areas. This type of targeted, large-scale economic development is traditionally the role of a state. **Connecticut has taken few steps to attract and retain businesses in station areas. The most important thing Connecticut can do to make TODs take off statewide is to align economic development policies, programs, and incentives at the state level to make it advantageous for businesses to locate jobs in walking distance of transit stations.** Until that happens, TOD will continue to remain a niche market, for those commuting to midtown Manhattan and to downtown Stamford.

TOD is an important development practice, and WestCOG is gratified to see the Transportation Committee considering it. However, in WestCOG's view, the best way to advance TOD is not to micromanage local zoning with one-size-fits-all rules, but to make station areas job centers through a TOD-focused state economic development strategy.

While they may be well-intentioned, the bill's proposals to override local control in station areas will not address the problem, and WestCOG opposes them.

Should you have questions, please do not hesitate to contact me.

Thank you for your consideration.

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

Francis R. Pickering
Executive Director