



To: Office of Policy and Management

From: Betsy Gara, Executive Director, COST

Date: April 30, 2026

Re: Preliminary Housing Growth Plan Guidelines

The Connecticut Council of Small Towns (COST), which represents 115 smaller communities throughout Connecticut, appreciates the opportunity to comment on the Office of Policy & Management's Preliminary Housing Growth Plan Guidelines.

As indicated, the 2025 Act Concerning Housing Growth (November Special Session Public Act 25-1) requires the Office of Policy and Management (OPM) to compile guidelines, as may be amended from time to time.

OPMs preliminary guidelines outline the planning provisions, including relevant deadlines, contained in PA 25-1. Although this is useful, it does not provide the level of guidance needed to assist small towns in complying with the requirements of PA 25-1.

Although PA 25-1 addressed many concerns that COST had with HB-5002 which was vetoed, it continues to impose sweeping planning requirements on the regional Councils of Government and municipalities. To facilitate municipal compliance, OPM must provide municipalities with more robust guidance, resources, and technical assistance.

WATER & WASTEWATER CAPACITY

Housing and other development projects are limited in areas that lack access to public sewer or public water supplies.

Many small towns are not served by public water systems and, instead, rely on wells which generally do not have sufficient flow or pressure to support dense multi-family housing developments. Extending public water supply mains to these areas is often cost prohibitive.

In addition, many municipalities do not have adequate sewer infrastructure to support dense housing developments. For example, many communities are in "sewer avoidance areas" designated as such by the state Department of Energy and Environmental Protection due to concerns regarding the impact of sewer overflows on water and environmental resources.



Limited wastewater capacity is also a barrier to housing and commercial development in many municipalities. Efforts to expand wastewater capacity or extend sanitary sewers often bump up against state and federal environmental regulations or significant costs.

Recognizing this, PA 25-1 directs OPM to undertake a wastewater capacity study. It is our understanding, however, that OPM does not have sufficient funding to undertake a study. A comprehensive wastewater capacity study, including recommendations for expanding capacity, is critical to the successful implementation of PA 25-1. In addition, the state should provide assistance to smaller municipalities by facilitating water main extensions, where feasible, to provide smaller municipalities with access to public water supplies.

RURAL COMMUNITIES - Connecticut's rural communities are a vital part of Connecticut's heritage, economy, tourism, and quality of life. However, many of these communities lack water and wastewater capacity or access to transit service. In addition, some small towns have very limited buildable areas because land is protected by conservation easements, such as public water supply watershed lands. At the same time, some rural towns are looking for ways to address housing needs but find they are shut out from funding opportunities which are targeted to support larger scale projects.

Accordingly, the housing growth guidelines should include recommendations to assist the state's rural communities in addressing housing needs. In addition, recognizing the difficulties rural towns face, the housing growth plans should refrain from imposing rigid affordable housing goals on the state's small and rural communities.

The preliminary guidelines note that mapping standards and instructions for submission of regional and municipal Housing Growth Plans will be forthcoming. The mapping standards and instructions should be made available for public comment when available.

COST also supports the comments submitted by the regional Councils of Government.

Thank you for the opportunity to comment.