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Making Great Communities Happen
**Connecticut Chapter of the
American Planning Association
Government Relations Committee**

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**TESTIMONY ON THE
Draft 2013-2018 Conservation & Development Policies Plan for Connecticut
AND LOCATIONAL GUIDE MAP**

**PRESENTED TO THE
CONTINUING LEGISLATIVE COMMITTEE ON STATE PLANNING AND DEVELOPMENT
FEBRUARY 22, 2013**

Good Morning. My name is Jana Butts and I am a member of the Government Relations Committee of CCAPA.

CCAPA is the Connecticut Chapter of the American Planning Association, the national organization of professional planners and citizens involved in planning for our nation's communities. CCAPA has over 450 members who are governmental and consulting planners, land use attorneys, citizen planners, and other professionals engaged in planning and managing land use, economic development, housing, transportation, and conservation for local, regional, and State governments and for private businesses and other entities. The Chapter has long been committed to assisting the Legislature and State agencies with developing and furthering responsible growth management principles. We have participated in and supported recent efforts to update the state plan in recognition of the changing and increasingly important role of proper growth management in shaping our economic and social future.

CCAPA submitted a comprehensive set of comments during the public comment period for the state plan. I will not repeat all of those comments this morning but I will touch on some points made in that document.

There is a widely-felt consensus that the draft *2013-2018 Conservation & Development Policies Plan for Connecticut* is a descriptive and informative state planning document. The six Growth Management Principles clearly describe a comprehensive responsible growth policy for the State of Connecticut. The Office of Policy and Management (OPM) has made several improvements in response to comments and concerns.

The main concern with the *2013-2018 Conservation & Development Policies Plan for Connecticut* is with the Locational Guide Map. CCAPA is concerned that the map does not accurately depict the state's development and conservation priorities as outlined in the six Growth Management Principles.

The methodology for Priority Funding Areas includes vast, rural census blocks where the nearest water, sewer, or transit service is sometimes many miles away. It is these areas at the rural-urban fringe that are the most critical areas to consider when the goal is "responsible growth". While dissatisfaction with the map has led some state-wide organizations to suggest that it be deleted, the opinion of CCAPA is that the map serves an important function in the planning process by illustrating the six growth management principles and providing guidance in their interpretation. CCAPA provided several suggestions for re-examining the methodologies used to prepare the map in our original comments.

In OPM's official responses to state agencies and other commenters, OPM reiterates that the Locational Guide Map is not intended to be the determinant of plan consistency; rather, the six Growth Management Principles as described in the text should be the determinant. However, in the plan section titled "How to Apply the Locational Guide Map", the plan specifically directs state agencies to use the Locational Guide Map to determine consistency.

In another response to state agency comments, OPM says it understands that the underlying map data (i.e. not just the Locational Guide Map but the mapping layers it is derived from) should be available to assist agencies in their planning efforts and in interpreting the plan. OPM says it will develop a means for agencies and other interested parties to view individual map data layers (such as water/sewer service areas, transit facilities, farmland soils, aquifer protection areas, etc.), based on actual boundaries and not simply by census block. While this is a good step, it is still unclear if state agencies will accurately use this data, especially when faced with tough decisions and pressure from outside forces.

CCAPA recognizes that the OPM has gone to great lengths to try to correct the improper use of the Locational Guide Map through outreach as well as through changes to the text of the draft plan, but it has not yet fully provided the necessary guidance to state agencies to use the plan correctly and consistently. OPM should continue to elaborate on a more descriptive and instruction set of procedures for the benefit of state agencies to assist them in the use of the plan and the Locational Guide Map.

The Office of Policy and Management also needs more time to respond to municipal requests for map changes. Some municipal requests that OPM would agree are consistent with the six Growth Management Principles, where misconstrued and still need to be corrected.

Lastly, the plan would ideally go further. It would be helpful if the plan included a set of goals (achievable within the time frame of the plan) and an implementation strategy. To address the reality of limited funding and competing needs, the implementation strategy could include how the priority funding areas would be prioritized for urban, suburban, and rural communities and provide direction on how funding would likely be allocated for each of these communities.

Thank you for the opportunity to speak to you today. CCAPA remains available to assist the Legislature and its Committees in their consideration of the state's most important planning document.