



ECONOMIC & COMMUNITY DEVELOPMENT DEPARTMENT

2020 Analysis of Impediments to Fair Housing Choice

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Table of Contents

Executive Summary	2
I. Introduction	7
II. Background Data	8
A. Population and Race:	8
B. Households:	27
C. Income and Poverty:	33
D. Employment:	38
E. Housing Profile:	41
F. Financing:	46
G. Household Types:	51
H. Cost Burden:	58
I. Housing Problems:	59
J. Disproportionately Greater Need: Severe Housing Problems:	62
K. Disabled Households:	64
III. Review/Update to Original Plan	67
IV. Impediments to Fair Housing 2020	72
A. Fair Housing Complaints:	72
B. Public Sector:	82
C. Private Sector:	116
D. Citizen Participation:	132
V. Actions and Recommendations	139
VI. Approval	143
VII. Certification	144
VII. Appendix	145
A. Agency/Organization Meetings and Additional Consultations	146
B. Resident Survey and Agency Survey	147
C. Citizen Participation	148



Executive Summary

The City of Milford, Connecticut is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." Entitlement communities must prepare an Analysis of Impediments (A.I.) to Fair Housing Choice, as evidence that they are affirmatively furthering fair housing.

The City of Milford has prepared this Analysis of Impediments to Fair Housing Choice for 2020, which focuses on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A review of the City's Zoning Ordinance, Comprehensive Plan, land use policies and procedures was undertaken
 - A review of the Milford Redevelopment & Housing Partnership's Annual Plans, the Public Housing Agency's Admission and Continued Occupancy Policy, the Housing Choice Voucher Administrative Plan, and Section 504 Needs Assessment.
 - Demographic data for the City was analyzed from the U.S. Census, American Community Survey, and the HUD-CHAS data and tables



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- A review of financial lending institutions mortgage practices through the Home Mortgage Disclosure Act (HMDA) database was completed.
 - A review of the real estate sales and practices was undertaken
 - A review of prior year plans
 - **Interviews & Meetings**
 - Meetings and interviews were conducted with several City of Milford's departments, the Milford Redevelopment & Housing Partnership, public safety departments, community advocacy groups and social service agencies, homeless service providers, neighborhood groups, economic development groups, education providers, housing providers, and faith based organizations and groups.
 - **Analysis of Data**
 - Low- and moderate-income areas were identified
 - Concentrations of minority populations were identified
 - Concentrations of rental and owner-occupied housing were identified
 - Awareness of fair housing in the community was evaluated
 - **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed
 - Private sector policies that may be viewed as impediments were analyzed

The City of Milford's 2020 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with the goals and strategies to address those impediments.

- **Impediment #1 – Fair Housing Education and Outreach:**

There is a continuing need to educate the public about the Fair Housing Act and the rights of the individuals and families as members of the protective classes, and a commitment from the City Officials to Affirmatively Further Fair Housing in the community.

Goal: Raise community awareness of fair housing and further fair housing choice especially for the low-income and disabled members of the population.



Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **1-A:** Continue to promote Fair Housing awareness through the social media, public service announcements, hosting seminars, and providing training to promote educational opportunities for all persons to learn about their rights and other people's rights under the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, and other Federal and State statutes.
- **1-B:** Continue to prepare, promote and distribute literature and informational material in both English and Spanish, on Fair Housing issues, an individual's housing rights, and a landlord's responsibility to comply with the Fair Housing Act to make reasonable accommodations.
- **1-C:** Promote and educate potential homebuyers that they have the right to live outside areas that have a high concentration of poverty.
- **1-D:** Work with the local Board of Realtors © to educate, train, and promote fair housing and prevent discriminatory practices such as "red lining" and "steering."

- **Impediment #2 – Quality of Housing Vs. Affordability:**

There is a supply of affordable housing, however the quality of the housing is below the local building code standards. Low-income tenants tend to be cost burdened and spend more than 30% of their total household income on housing expenses for code deficient apartments.

Goal: Increase the supply of decent, safe, sound, and affordable rental housing for low-income persons and families through rehabilitation and new construction.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **2-A:** Provide funds and incentives for property owners to rehabilitate their existing rental units to remain affordable to accommodate the housing needs of low-income individuals and families.
- **2-B:** Continue to enforce local codes and ordinances to ensure that rental units meet the minimum property standards.
- **2-C:** Promote and encourage the local Housing Authority to provide their housing choice voucher holders with the opportunity to become homeowners and use their voucher to make mortgage payments.



- **2-D:** Continue to support the Low Income Housing Tax Credit (LIHTC) Program and promote the development of mixed income rental housing.
- **2-E:** Continue to promote new development to abide by the State of Connecticut Law, "Affordable Housing Land Use Appeals", Section 8-30g, that requires at least 10% of the housing in the community be affordable through deed restriction or government program requirement.

- **Impediment #3 – Lack of Quality Affordable Housing For Home Buyers:**

There is a lack of housing resources for low- and moderate-income households to purchase a home in the City. Houses that are affordable are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing for sale through rehabilitation and new construction.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **3-A:** Financially support and assist low- and moderate-income households to purchase a home in the City.
- **3-B:** Financially support and promote the development of affordable in-fill housing on vacant lots throughout the City.
- **3-C:** Continue to fund and promote homeowner housing rehabilitation and emergency repairs.
- **3-D:** Provide financial support and incentives to developers and non-profits to construct new affordable housing for low- and moderate-income families.
- **3-E:** Encourage, financially support and promote the development of mixed income housing for sale in the City.

- **Impediment #4 – Continuing Need for Accessible Housing:**

As an older built-up environment, there is a lack of accessible housing units in the City of Milford. Over 45% of the City's housing stock was built over 60 years ago and does not have accessibility features, while 10.4% of the City's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.



Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **4-A:** Support the City's Housing Rehabilitation Program to increase the number of accessible housing units for homeowners and renters.
- **4-B:** Encourage the development of new housing that is accessible and visitable to the physically disabled.
- **4-C:** Continue to enforce the ADA and Fair Housing requirements for rental property, and make "reasonable accommodations" for tenants who are disabled.
- **4-D:** Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

- **Impediment #5 – Economic Issues Affecting Housing Choice:**

There is a lack of economic opportunities in the City of Milford which prevents low-income households from increasing their financial resources to be able to choose to live outside areas of concentration.

Goal: The local economy will continue to improve by providing new job opportunities, which will increase household income, and will promote Fair Housing Choice.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **5-A:** Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- **5-B:** Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- **5-C:** Support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income and minority neighborhoods.
- **5-D:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.



I. Introduction

The City of Milford is a CDBG Entitlement Community under the U.S. Department of Housing and Urban Development's Community Development Block Grant Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." As evidence of "affirmatively furthering fair housing" the community must conduct an Analysis of Impediments to Fair Housing Choice (A.I.) which identifies any impediments to fair housing choice.

"Fair housing choice" is defined as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

The Analysis of Impediments consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The City of Milford has prepared this 2020 Analysis of Impediments to Fair Housing Choice to coincide with the City's Five-Year Consolidated Plan for FY 2020-2024. The Analysis of Impediments was on public display from the period of July 9, 2020 to July 24, 2020.



II. Background Data

In order to perform an analysis of fair housing in the City of Milford, the demographic and socio-economic characteristics of the City were evaluated as a basis for determining and identifying if there are any existing impediments to fair housing choice.

English settlers affiliated with the New Haven Colony purchased the area known as “Wepawaug” in February of 1639 along Long Island Sound. Settlers arrived later in the year and built the Town of Milford. In 1822 portions of a then larger Milford split off to become the Town of Orange. Throughout the 1800s, Milford was known for shipbuilding, oystering, and farming. In fact, Milford resident Harry Perry, according to the Connecticut Historical Society, is credited with introducing the now-classic lobster roll on a split-top roll at a Milford shop in 1934.

The Town of Milford remained largely unchanged until World War II, earning a reputation for being Connecticut’s “Sleepy Hollow” in the vein of Washington Irving’s famous gothic story. Following World War II, Milford became significantly more suburbanized. The Town of Milford became the City of Milford on June 15, 1959. Shortly thereafter, the Schick Shaving Company moved its manufacturing facilities to the City in 1961, and many other multinational companies followed suit. Today, Milford is home to thousands of businesses, with easy access to the rest of Connecticut via I-95, and an unmatched quality of life for most of its residents.

A. Population and Race:

Population

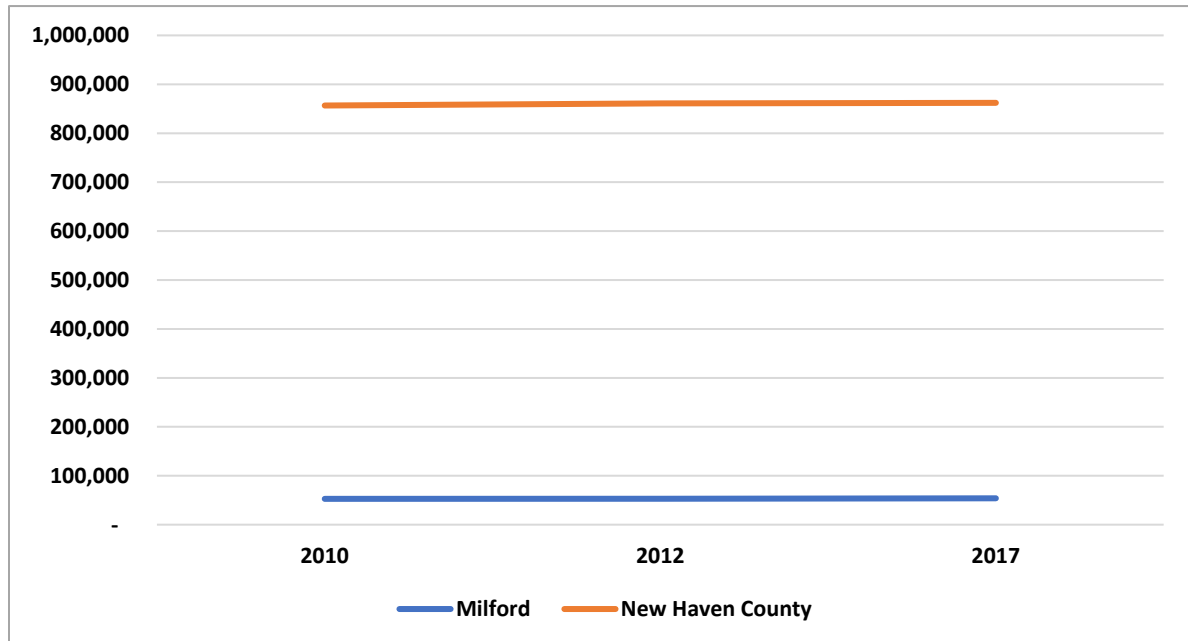
The total population for the City of Milford at the time of the 2010 Census was 52,753, the American Community Survey Estimate for 2012 was 52,826, and the 2017 estimate was 53,867. This illustrates a stable, but slowly increasing population.

The U.S. Census Bureau uses the population at the time of the 2010 Census to make annual estimates as to changes in population. The population estimate for 2017 is the most complete recent estimates available. Between 2010 and 2017, the City’s population increased by about 2.11%, or an estimated 1,114 people. Over the same period, New Haven County’s population increased from 856,688 people in 2010 to 862,127 people in 2017, an increase of 0.63%, and the State of Connecticut’s population increased from 3,545,837 people in 2010 to 3,594,478 people in 2017, an increase of 1.37%.



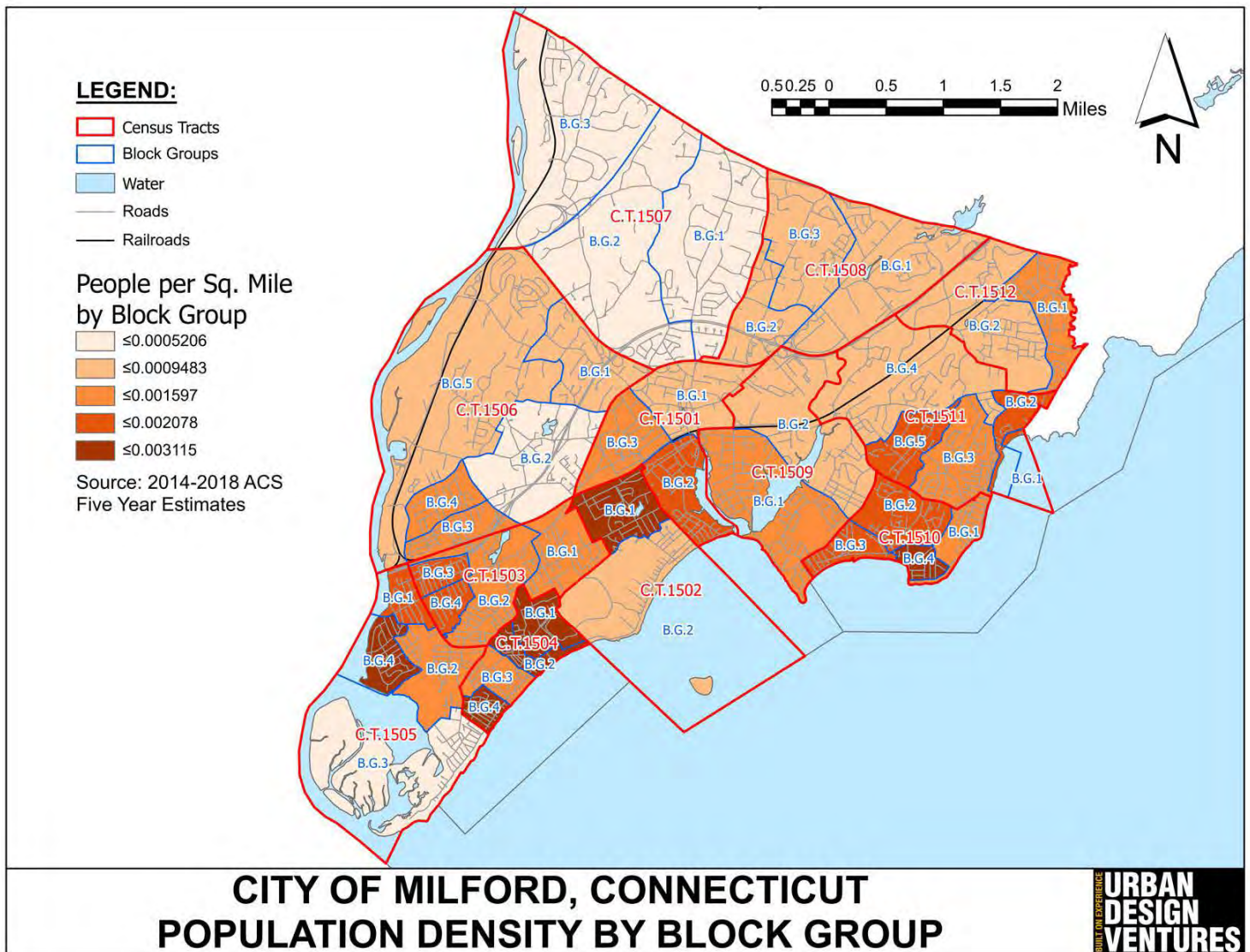
In 2017, there was an estimated 27,550 females (48.9%) and 26,317 males (51.1%) living in the City of Milford.

Chart II-1 Population Trend in the City of Milford, CT



Source: 2010 Census Data, 2008-2012 ACS, and 2013-2017 ACS

The following population density map shows that the City's population is more dense in the Central City and southern areas.



Racial Makeup of Population

Table II-1 illustrates that “White alone” is the largest racial cohort in Milford, making up 88.9% of the City’s population in 2017. Hispanic/Latino remains the largest minority cohort, at 6.7% followed by the Asian population at 5.2%.



**Table II-1 – Racial Makeup of the Population
in the City of Milford, CT**

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	52,826	--	53,867	--
White alone	47,543	90.00%	47,888	88.90%
Black or African American alone	1,585	3.00%	1,724	3.20%
American Indian and Alaska Native alone	264	0.50%	0	0.00%
Asian alone	3,698	7.00%	2,801	5.20%
Native Hawaiian and Other Pacific Islander alone	53	0.10%	0	0.00%
Some other race alone	687	1.30%	539	1.00%
Two or more races	-	-	862	1.60%
Hispanic or Latino	2,588	4.90%	3,609	6.70%

Source: 2008-2012 and 2013-2017 ACS

The City of Milford's total percentage of minority population (non-white alone) slightly increased from 10.0% in 2012, to 11.1% in 2017.



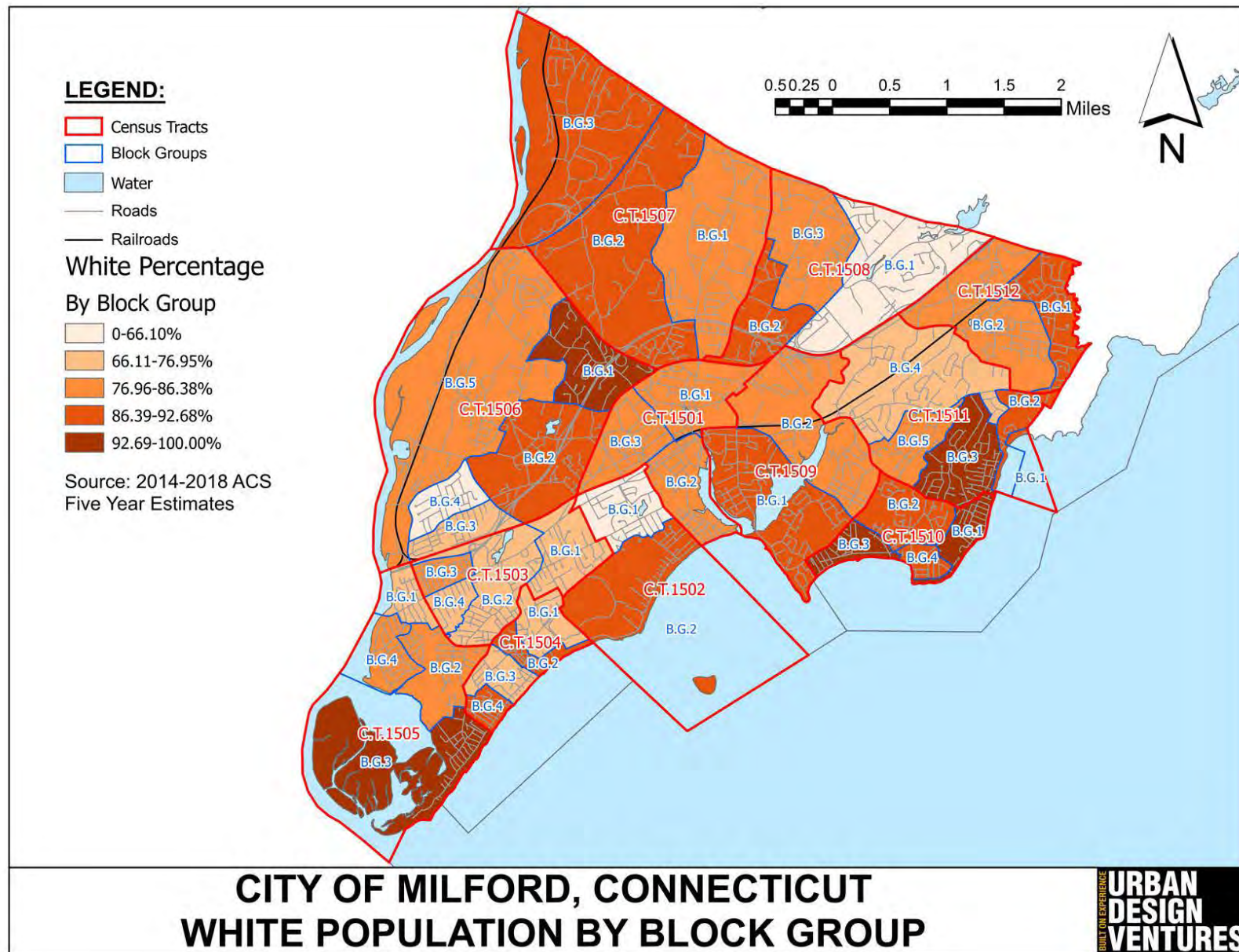
Table II-2 outlines the minority populations in each Census Tract in the City as reported in the 2013-2017 ACS. Data for the 2008-2012 was not available on data.census.gov.

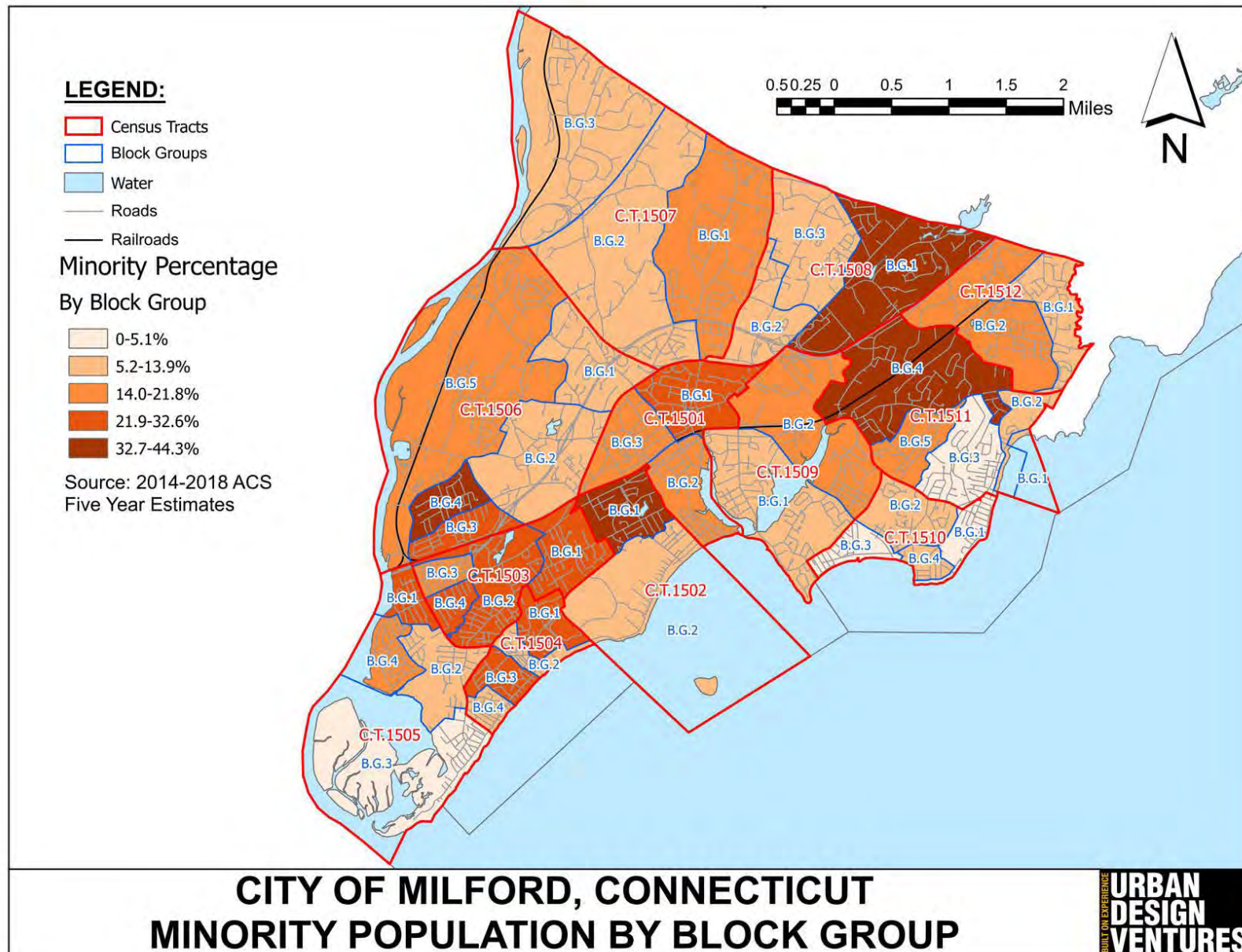
Census Tract	2013-2017 ACS		
	Total Population	Minority Population	% Minority Population
1501 1	1,173	283	24.13%
1501 2	1,741	326	18.72%
1501 3	1,568	252	16.07%
1502 1	2,369	916	38.67%
1502 2	1,094	107	9.78%
1503 1	1,161	353	30.40%
1503 2	1,584	456	28.79%
1503 3	685	137	20.00%
1503 4	671	219	32.64%
1504 1	1,868	480	25.70%
1504 2	788	86	10.91%
1504 3	668	166	24.85%
1504 4	623	67	10.75%
1505 1	744	208	27.96%
1505 2	1,410	192	13.62%
1505 3	877	45	5.13%
1505 4	1,331	218	16.38%
1506 1	917	100	10.91%
1506 2	620	77	12.42%
1506 3	818	205	25.06%
1506 4	889	394	44.32%
1506 5	3,935	747	18.98%
1507 1	1,737	270	15.54%
1507 2	1,616	176	10.89%
1507 3	1,201	159	13.24%
1508 1	1,590	606	38.11%
1508 2	792	100	12.63%
1508 3	1,478	206	13.94%
1509 1	2,320	292	12.59%



1509 2	1,557	275	17.66%
1510 1	635	-	0.00%
1510 2	1,694	166	9.80%
1510 3	919	36	3.92%
1510 4	816	108	13.24%
1511 1	601	61	10.15%
1511 2	1,236	106	8.58%
1511 3	1,811	58	3.20%
1511 4	1,831	677	36.97%
1511 5	1,447	316	21.84%
1512 1	1,633	209	12.80%
1512 2	1,599	335	20.95%
Census Tract Totals	54,047	10,190	18.85%

The following maps illustrate the percentages of White and Minority Populations in further detail by Block Group, in the City of Milford. The darker shaded areas indicate a concentration of white and minority populations.







Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. Dissimilarity indices measure the separation or integration of races across all parts of the city, county, or state. The latest dissimilarity index is based on the data from the 2010 U.S. Census and was calculated as part of Brown University's American Communities Project (<http://www.s4.brown.edu/us2010/>). However, the American Communities Project did not perform an analysis for only the City of Milford after 2000. Instead, there is data for the New Haven-Milford Metropolitan Statistical Area (MSA). This compares the latest Milford information (1990) with the New Haven-Milford MSA information in the same time period, and provides the most current New Haven-Milford MSA data.

The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. It compares the integration of racial groups with the White population of the City, or MSA, on a scale from 0 to 100, with 0 being completely integrated and 100 being completely separated. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different census tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low segregation. The following chart highlights the dissimilarity indices for various racial and ethnic groups, as compared to the White population in the City of Milford.

The Hispanic population was the largest minority group in the City in 1990, making up 2.3% of the population and with a dissimilarity index of 11.8. The Asian population had a dissimilarity index of 18.4 and the Black/African American Population had a dissimilarity index of 15.0. All other minority groups have relatively small populations, which introduces some error into the calculation of the dissimilarity indices. More specifically, for populations under 1,000 people, the dissimilarity index may be high even if the population is evenly distributed across the City, Metropolitan Statistical Area, or State. In the 1990s, dissimilarity was quite low for these groups.

The New Haven-Milford MSA's largest minority group in 1990 was Black/African American (9.8%), but changed to Hispanic in 2010 (15%). The dissimilarity index within the MSA in 1990 for Black/African American was 68.1, and the Hispanic population had a dissimilarity index of 57.1. These are above moderate levels of segregation within the MSA, compared to the City's. The dissimilarity index decreased slightly by the time of the 2010 Census for the New Haven-Milford MSA, including 62.2% for the Black/African American population, and 54.4% for the Hispanic population.



There are no large concentrations of minority groups in certain areas, so policies and practices are not immediately recognized as impediments.

Exposure indices refer to the racial/ethnic composition of the tract where the average member of a given group lives. For example, the average Hispanic person in some metropolis might live in a tract that is 40% Hispanic, 40% non-Hispanic white, 15% black, and 5% Asian. (Note that these various indices must add up to 100%.) These are presented as two categories: exposure of the group to itself, which is called the Isolation Index, and exposure of the group to other groups.

The isolation index is the percentage of the same-group population in the census tract where the average member of a racial/ethnic group lives. It has a range of zero (for a very small group that is quite dispersed) to 100 (meaning that group members are entirely isolated from other groups). It should be kept in mind that this index is affected by the size of the group -- it is almost inevitably smaller for smaller groups, and it is likely to rise over time if the group becomes larger. The isolation index of White to White in the City of Milford in 1990 is 95.0, Black to Black is 1.7, Hispanic to Hispanic is 2.5, and Asian to Asian is 1.2.

Indices of exposure to other groups also range from 0 to 100, where a larger value means that the average group member lives in a tract with a higher percentage of persons from the other group. These indices depend on two conditions: the overall size of the other group and each group's settlement pattern. The exposure to other groups' index for Black to White in Milford in 1990 is 94.6, and for White to Black, 1.5. The index for Hispanic to White is 94.7, and Asian to White is 94.7. Milford's White population is large, and therefore "isolated" while the smaller minority populations are naturally exposed to Whites and to other groups.

Table II-3 – Dissimilarity and Exposure Indices – City of Milford

	Dissimilarity Index With Whites	Isolation Index	Exposure to Other Groups*
White	--	95.0	1.5**
Black	15.0	1.7	94.6
Asian	18.4	1.2	94.7
Hispanic	11.8	2.5	94.7

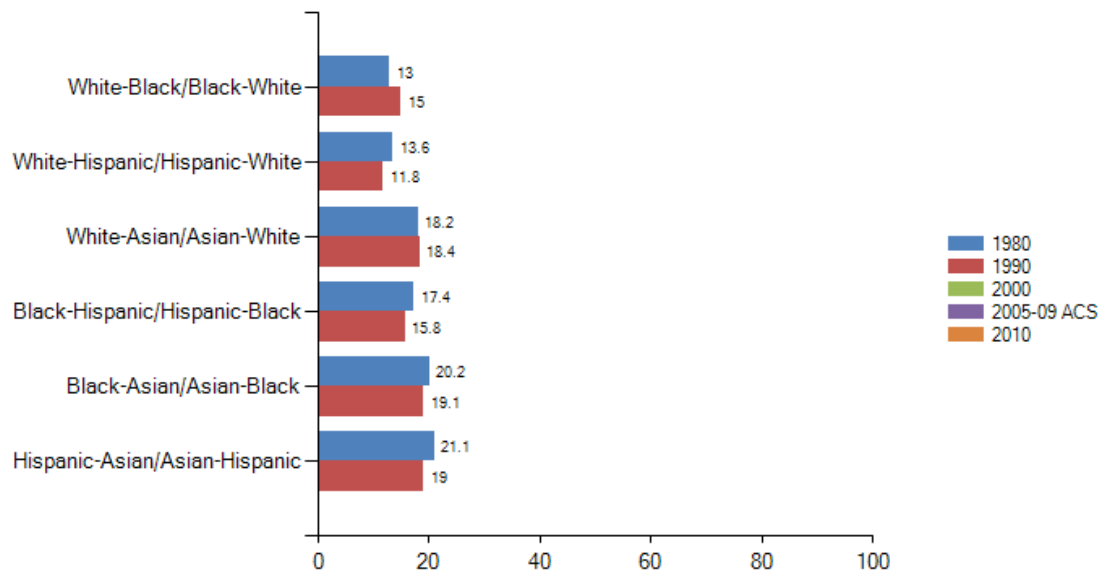
Source: American Communities Project, 1990 Census

* *Exposure of minorities to Whites*

** *Exposure of Whites to Blacks*

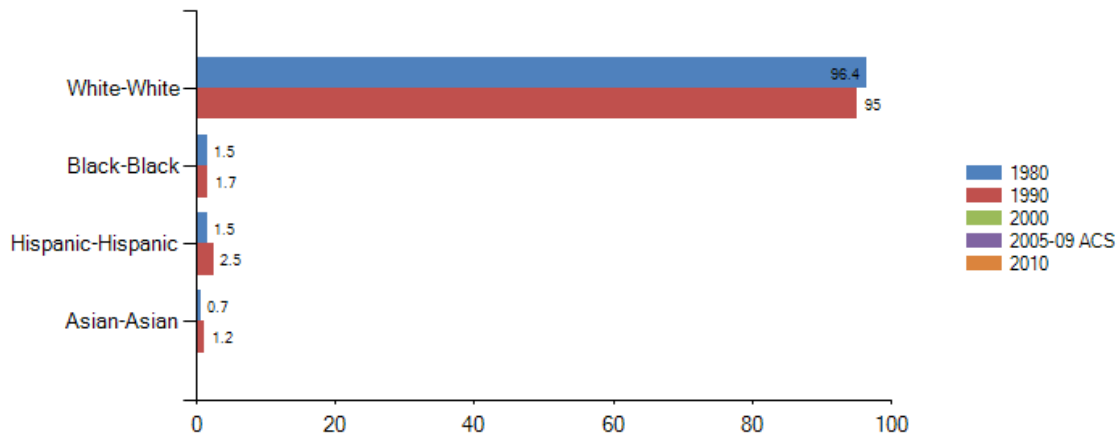


Chart II-2 – Dissimilarity Index in the City of Milford



Source: American Communities Project, U.S. Census

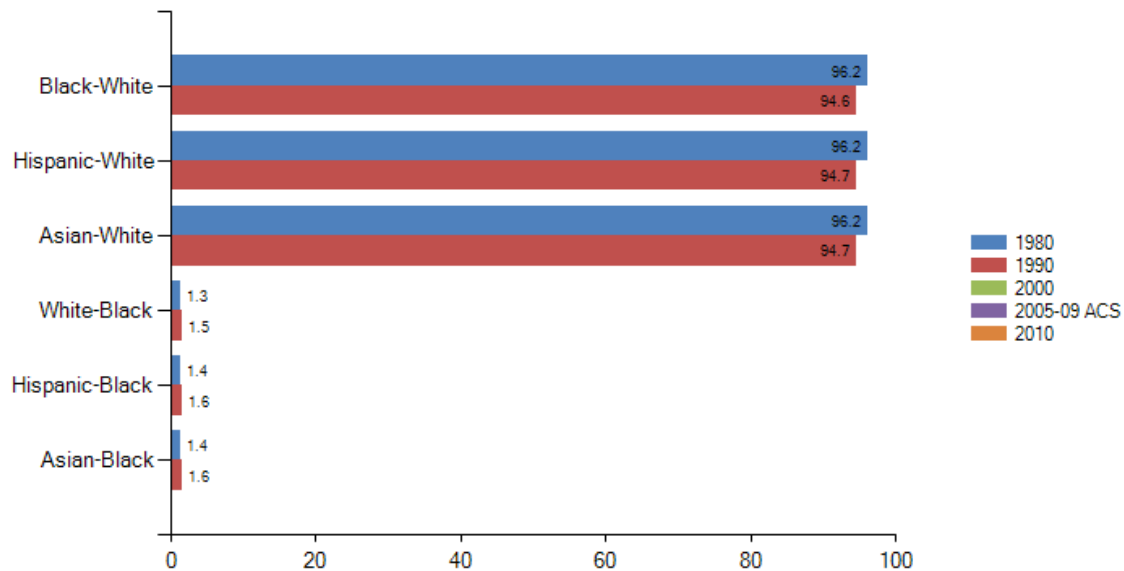
Chart II-3 – Isolation Index in the City of Milford



Source: American Communities Project, U.S. Census



Chart II-4 – Exposure Index in the City of Milford



Source: American Communities Project, U.S. Census

Ethnicity

Table II-4 highlights the ancestry and ethnicities of Milford's residents at the time of the 2008-2012 and more recent 2013-2017 American Community Survey.

Table II-4 – Population by Ethnicity and Ancestry in the City of Milford, CT

Ethnicity and Ancestry in the City of Milford				
ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total population	52,826	--	53,867	--
Afghan	14	0.03%	0	0.00%
Albanian	40	0.08%	85	0.16%
Alsatian	0	0.00%	0	0.00%
American	1,563	2.96%	1,604	2.98%
Arab:	221	0.42%	535	0.99%
Armenian	67	0.13%	80	0.15%



Assyrian/Chaldean/Syriac	0	0.00%	0	0.00%
Australian	18	0.03%	22	0.04%
Austrian	149	0.28%	271	0.50%
Basque	0	0.00%	0	0.00%
Belgian	62	0.12%	55	0.10%
Brazilian	274	0.52%	395	0.73%
British	413	0.78%	112	0.21%
Bulgarian	86	0.16%	0	0.00%
Cajun	0	0.00%	0	0.00%
Canadian	245	0.46%	246	0.46%
Carpatho Rusyn	0	0.00%	0	0.00%
Celtic	0	0.00%	34	0.06%
Croatian	99	0.19%	105	0.19%
Cypriot	0	0.00%	0	0.00%
Czech	213	0.40%	270	0.50%
Czechoslovakian	178	0.34%	149	0.28%
Danish	292	0.55%	256	0.48%
Dutch	513	0.97%	381	0.71%
Eastern European	157	0.30%	155	0.29%
English	5,168	9.78%	5,054	9.38%
Estonian	22	0.04%	0	0.00%
European	294	0.56%	453	0.84%
Finnish	74	0.14%	138	0.26%
French (except Basque)	1,939	3.67%	2,236	4.15%
French Canadian	1,163	2.20%	1,068	1.98%
German	6,531	12.36%	6,283	11.66%
German Russian	0	0.00%	0	0.00%
Greek	657	1.24%	344	0.64%



Guyanese	0	0.00%	0	0.00%
Hungarian	1,637	3.10%	1,130	2.10%
Icelander	0	0.00%	7	0.01%
Iranian	22	0.04%	0	0.00%
Irish	13,316	25.21%	12,196	22.64%
Israeli	18	0.03%	0	0.00%
Italian	14,270	27.01%	12,925	23.99%
Latvian	49	0.09%	36	0.07%
Lithuanian	562	1.06%	427	0.79%
Luxemburger	6	0.01%	8	0.01%
Macedonian	26	0.05%	0	0.00%
Maltese	0	0.00%	34	0.06%
New Zealander	0	0.00%	0	0.00%
Northern European	67	0.13%	25	0.05%
Norwegian	200	0.38%	220	0.41%
Pennsylvania German	12	0.02%	0	0.00%
Polish	4,940	9.35%	5,090	9.45%
Portuguese	710	1.34%	385	0.71%
Romanian	77	0.15%	213	0.40%
Russian	1,295	2.45%	1,335	2.48%
Scandinavian	50	0.09%	78	0.14%
Scotch-Irish	293	0.55%	186	0.35%
Scottish	1,316	2.49%	761	1.41%
Serbian	84	0.16%	14	0.03%
Slavic	0	0.00%	118	0.22%
Slovak	1,387	2.63%	961	1.78%
Slovene	51	0.10%	24	0.04%
Soviet Union	26	0.05%	0	0.00%



Subsaharan African:	364	0.69%	377	0.70%
Swedish	1,300	2.46%	947	1.76%
Swiss	49	0.09%	100	0.19%
Turkish	173	0.33%	48	0.09%
Ukrainian	440	0.83%	385	0.71%
Welsh	239	0.45%	227	0.42%
West Indian (except Hispanic groups):	379	0.72%	719	1.33%
Yugoslavian	93	0.18%	45	0.08%

Source: 2008-2012 & 2013-2017 ACS

The most common ancestral group identified in the City of Milford based on the 2008-2012 ACS data was Italian with 14,270 residents comprising 27.01% of the population. The second most common ancestral group identified in the City of Milford in 2012 was Irish with 13,316 residents comprising 25.21% of the population.

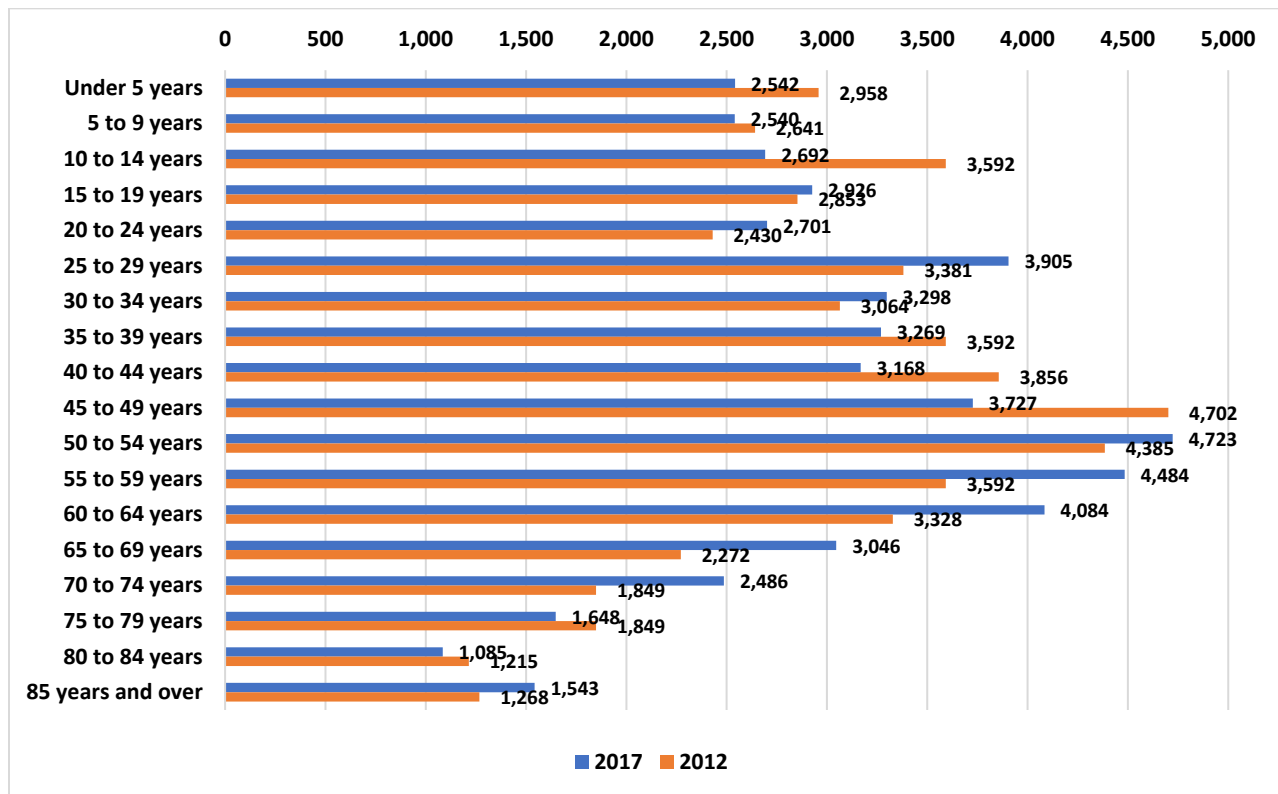
Similarly, the most common ancestral group identified in the City of Milford based on the 2013- 2017 ACS data was still Italian with 12,925 residents comprising of 23.99% of the population. The second most common ancestral group identified in the City of Milford based on the 2013- 2017 was Irish with 12,196 residents comprising of 22.64% of the population.

Age

Chart II-5 illustrates age distribution within the City for the 2008-2012 and 2013-2017 American Community Survey. In 2017 children under five years of age represented 4.7% of the population; 19.8% of the City's population was under 20 years of age; and 18.2% were 65 years of age or older. The City has seen an increase in population of persons aged 85 and over, as well as a decrease of 2.4% of a significant portion of the working age population, specifically age groups 20-55.



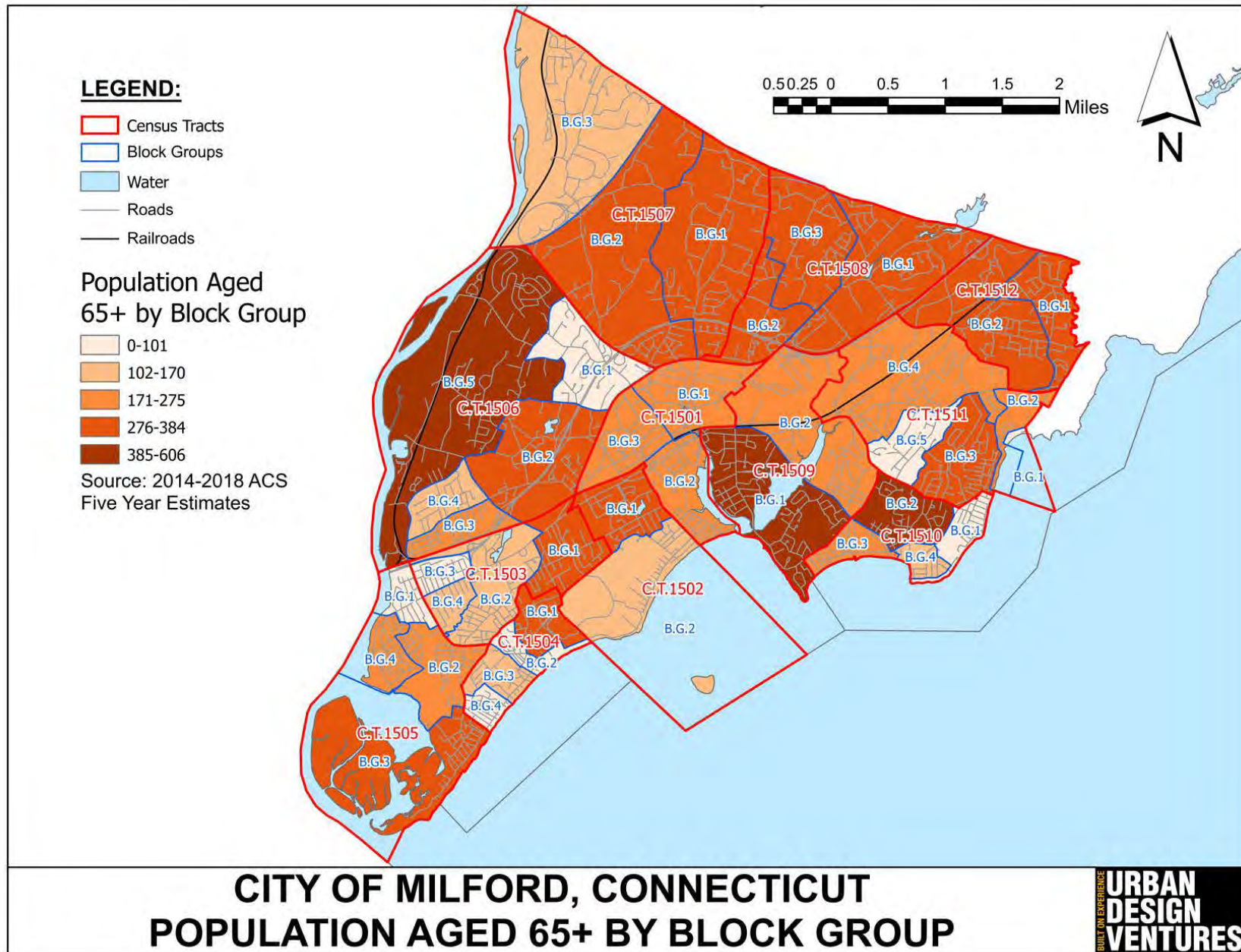
Chart II-5 – Age of Population in the City of Milford, CT

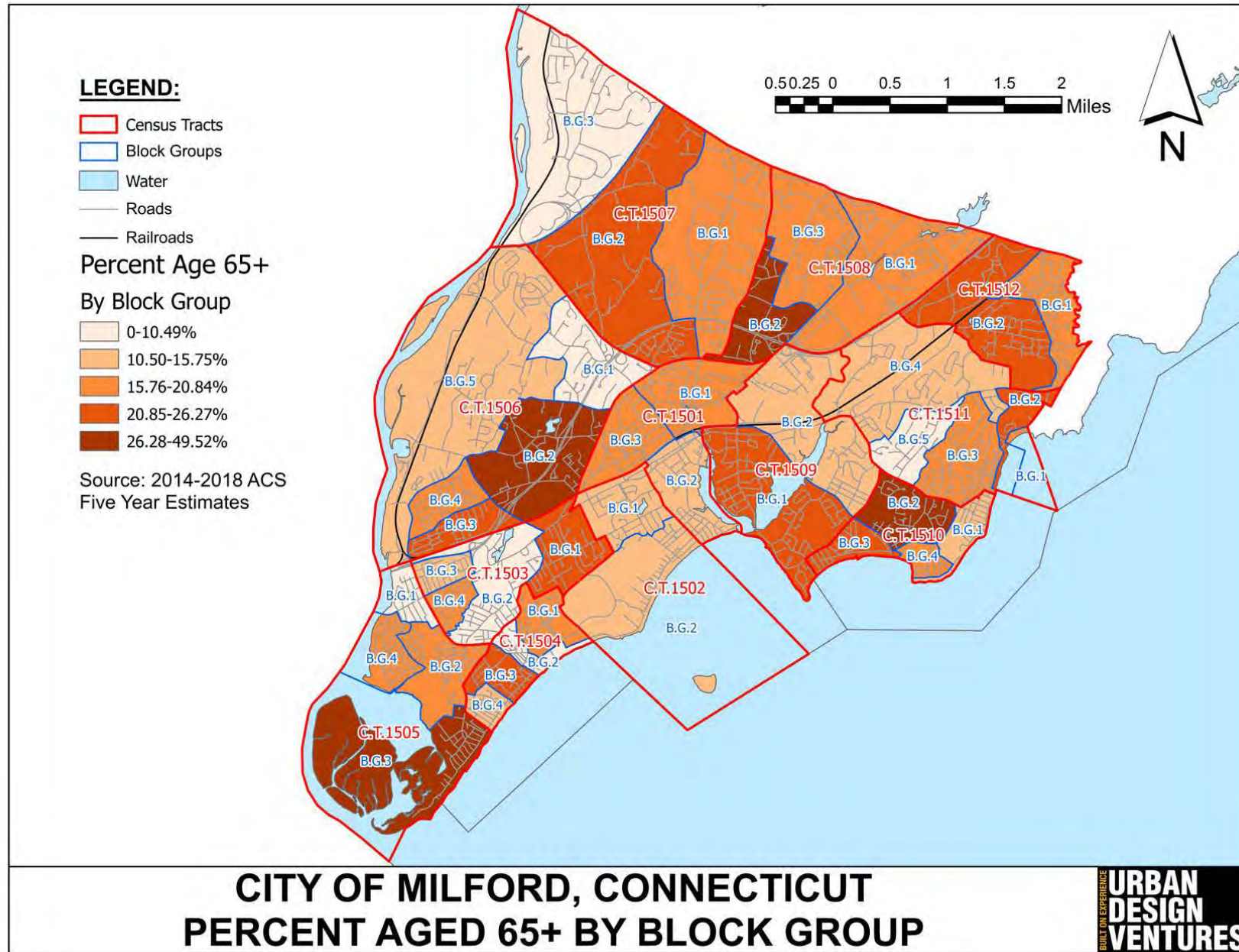


Source: 2008-2012 & 2013-2017 ACS

The median age in the City of Milford at the time of the 2013-2017 American Community Survey was 44.8 years. The median age during the 2013-2017 American Community Survey in New Haven County is younger at 40.1 years, and the median age in the State of Connecticut is also lower than the City's median age at 40.8 years.

The following maps illustrate the count and percentage of the population Age 65 and Over by Block Group in the City of Milford. There has been a National increase in the percentage of the population Age 65 and over, and as a result, it would seem that there could be a greater need for ADA improvements in housing and public spaces. Age 65 and over individuals and households are presumed to be low- or moderate-income by HUD, since many are living on fixed incomes.







Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Milford, the City used the data made available by the Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. Unfortunately, the total number cannot be disaggregated to determine the distribution across denominational groups. The table below shows the distribution of residents of the New Haven-Milford MSA across various denominational groups as a percentage of the population which reported affiliation with a church.

Table II-5 compares religious affiliation in the New Haven-Milford MSA from 1990 through 2010 using data from the Association of Religious Data Archives.

Table II-5: Religious Affiliation in New Haven County

	1990		2000		2010	
	#	%	#	%	#	%
Total Population:	804,219	-	824,008	-	862,477	-
Evangelical Protestant	36,316	4.5%	15,961	1.9%	33,484	3.9%
Black Protestant	7,705	1.0%	-	-	6,471	0.8%
Mainline Protestant	69,183	8.6%	60,697	7.4%	52,851	6.1%
Catholic	368,313	45.8%	319,399	38.8%	304,677	35.3%
Orthodox	109	0.0%	3,465	0.4%	3,731	0.4%
Other	36,790	4.6%	43,325	5.3%	19,943	2.3%
Total Adherents:	518,416	64.5%	442,847	53.7%	421,157	48.8%
Unclaimed:	285,803	35.5%	381,161	46.3%	441,320	51.2%

Source: The Association of Religious Data Archives; <http://www.thearda.com>



Between 1990 and 2010, the New Haven-Milford MSA experienced a 23.6% decrease in people identifying themselves as “Mainline Protestants,” and a 7.8% increase in the portion of the religious population identifying itself as “Evangelical Protestants.” Between 1990 and 2010, the MSA saw an 18.8% decrease in the number of people identifying with religious traditions and an increase of 54.4% of unclaimed population between 1990 and 2010. By 2010 the number of adherents to religion was less than the number of persons who were “unclaimed” in regard to a religious affiliation.

B. Households:

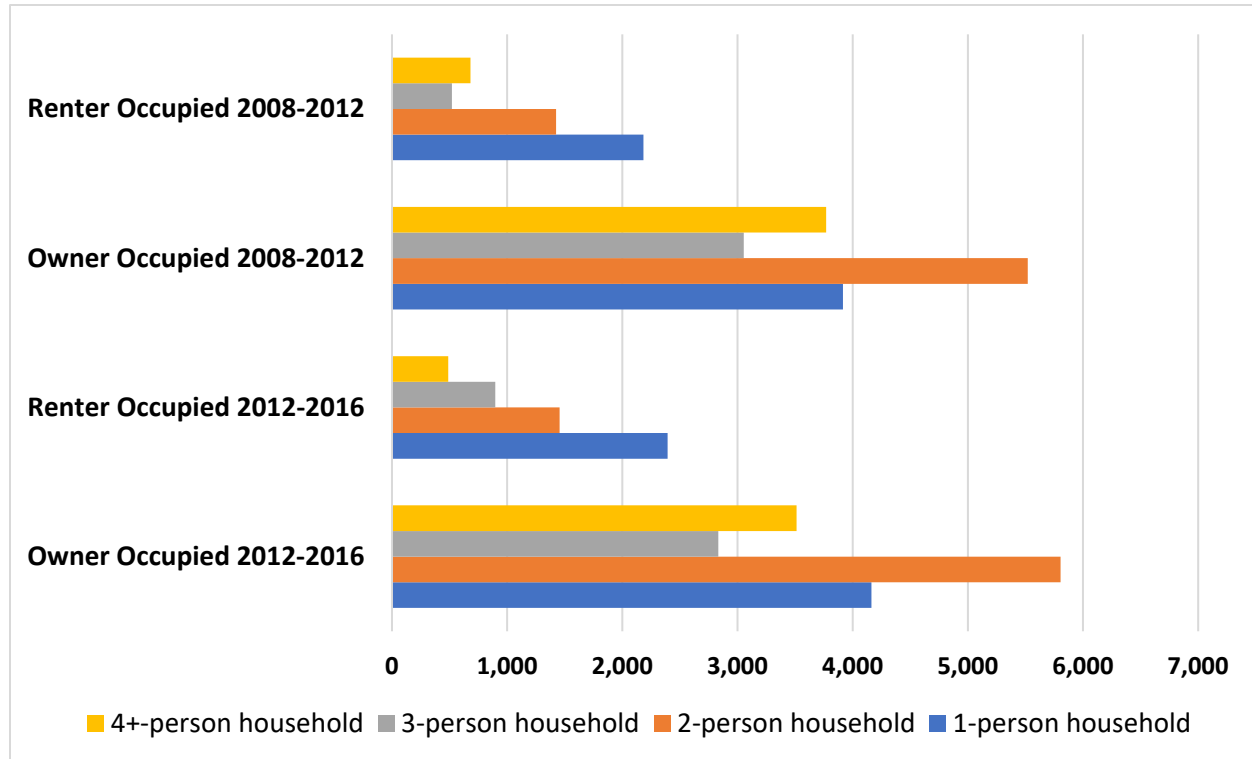
According to the American Community Survey for 2008-2012, there were 22,330 housing units in the City of Milford. Of these housing units, 21,071 (94.4%) were occupied and 1,259 (5.6%) were vacant. Of the occupied housing units: 16,261 (77.2%) were owner-occupied; and 4,810 (22.8%) were renter occupied.

According to the 2013-2017 ACS 5-Year estimates, there were 23,571 housing units in the City of Milford. Of these housing units: 21,634 (91.8%) were occupied; and 1,937 (8.2%) were vacant. Of the occupied housing units: 16,525 (76.4%) were owner-occupied; and 5,109 (23.6%) were renter occupied.

Between the 2008-2012 and 2013-2017 American Community Surveys there was a 5.6% increase in housing units in the City of Milford. Over the course of this time period, the proportion of owner and renter occupied housing units remained the same, however the total number of owner occupied housing increased by 1.6% and the total number of renter occupied units increased by 6.2%. In 2017 the average size of the owner-occupied households was 2.59 persons, and the average renter household was 2.09 persons. **Chart II-6** illustrates household size breakdown of owner and renter households.

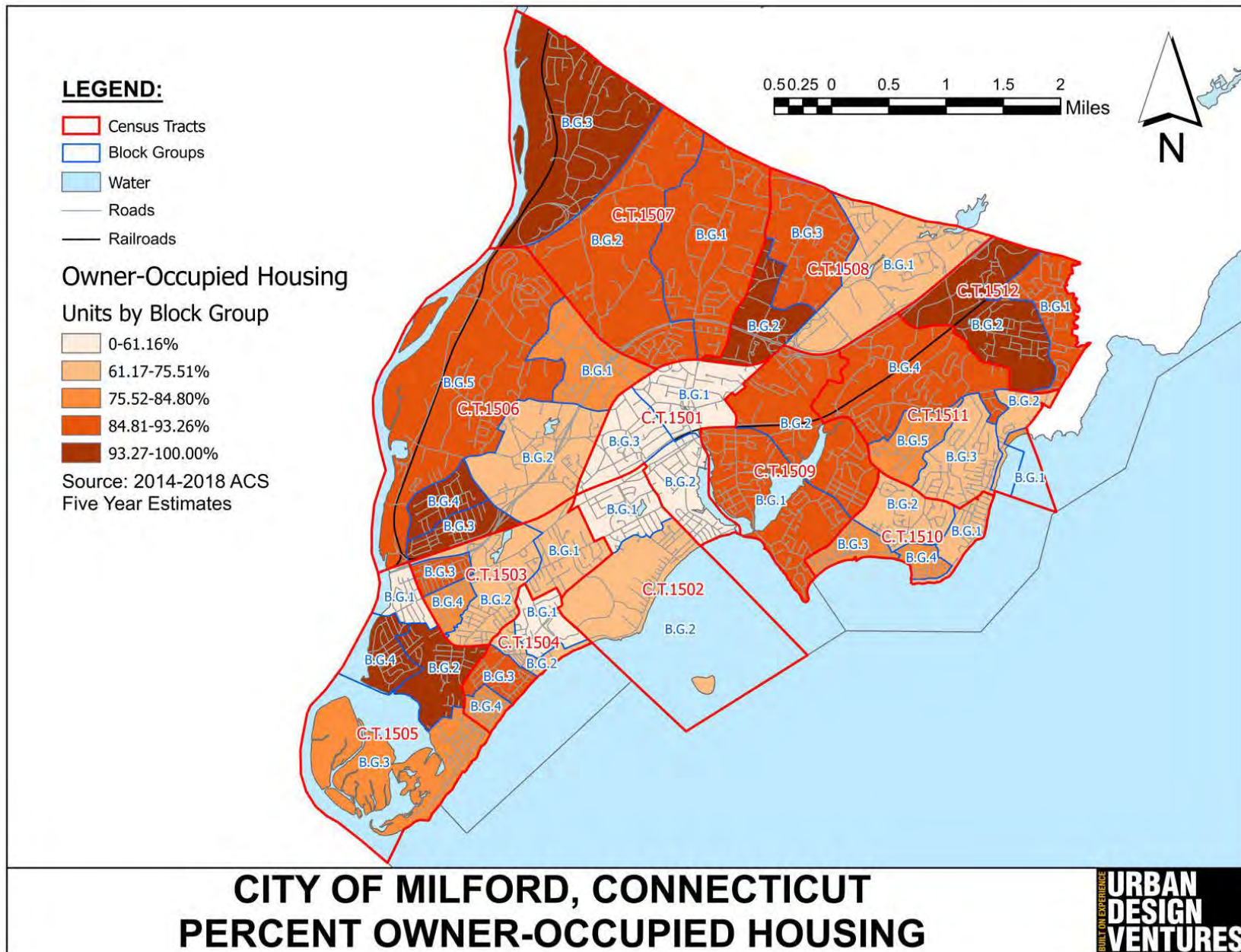


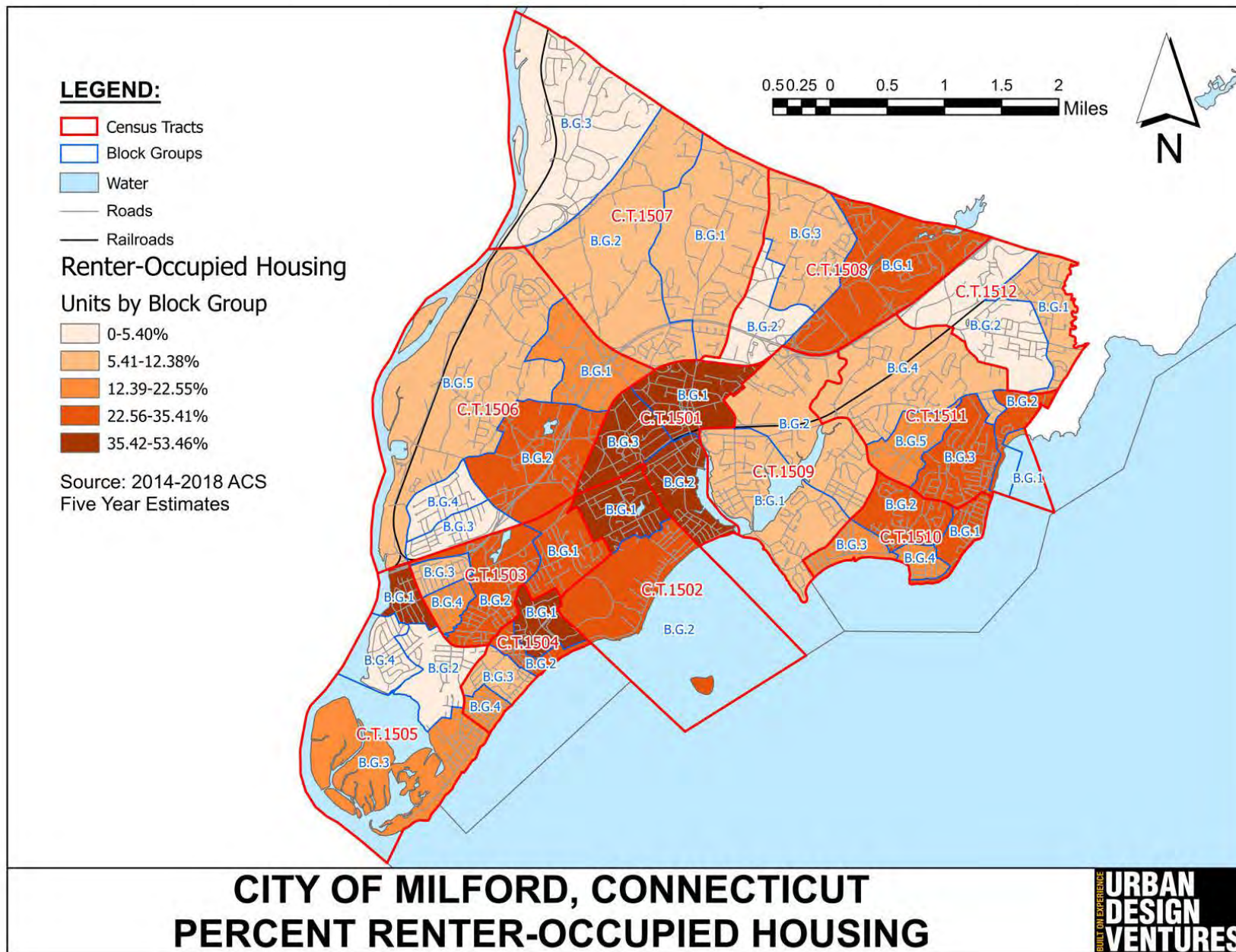
Chart II-6 – Occupancy by Tenure in the City of Milford, CT



Source: 2008-2012 & 2012-2016 ACS
Note: There is no 2013-2017 ACS estimates for Occupancy by Tenure

The following maps illustrate the percentages of Owner and Renter-Occupied Housing Units by Block Group in the City of Milford.







The following **Table II-6** compares homeowners and renters by race. This table shows from the 2013-2017 ACS data that “White” households represent the largest percentage of homeownership (93.7%) with “Asian” and “Hispanic or Latino” households each comprising (3.50%) of the total homeowners according to the 2013-2017 American Community Survey.

Homeownership rates for Black and Hispanic or Latino householders have increased, while other races have declined slightly, according to the 2008-2012 and 2013-2017 American Community Survey data. Homeowners represented 77.2% (16,261) of all households in 2012 and 76.4% (16,525) of all households in 2017. Renters represented 22.8% (4,810 households) of all households in 2012 and 23.6% (5,109 households) of all households in 2017.

Table II-6 – Household Tenure by Race

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Total Households	16,261	--	4,810	--	16,525	--	5,109	--
Householder who is White alone	15,302	94.10%	3,867	80.40%	15,490	93.70%	4,244	83.10%
Householder who is Black or African American alone	228	1.40%	221	4.60%	303	1.80%	241	4.70%
Householder who is American Indian and Alaska Native alone	16	0.10%	24	0.50%	6	0.00%	0	0.00%
Householder who is Asian alone	553	3.40%	519	10.80%	584	3.50%	429	8.40%
Householder who is Native Hawaiian and Other Pacific Islander alone	-	0.00%	-	0.00%	-	0.00%	-	0.00%
Householder who is some other race alone	33	0.20%	120	2.50%	41	0.20%	55	1.10%
Householder who is two or more races	130	0.80%	58	1.20%	101	0.60%	140	2.70%
Householder who is Hispanic or Latino	325	2.00%	491	10.20%	585	3.50%	373	7.30%

Source: 2008-2012 & 2013-2017 ACS

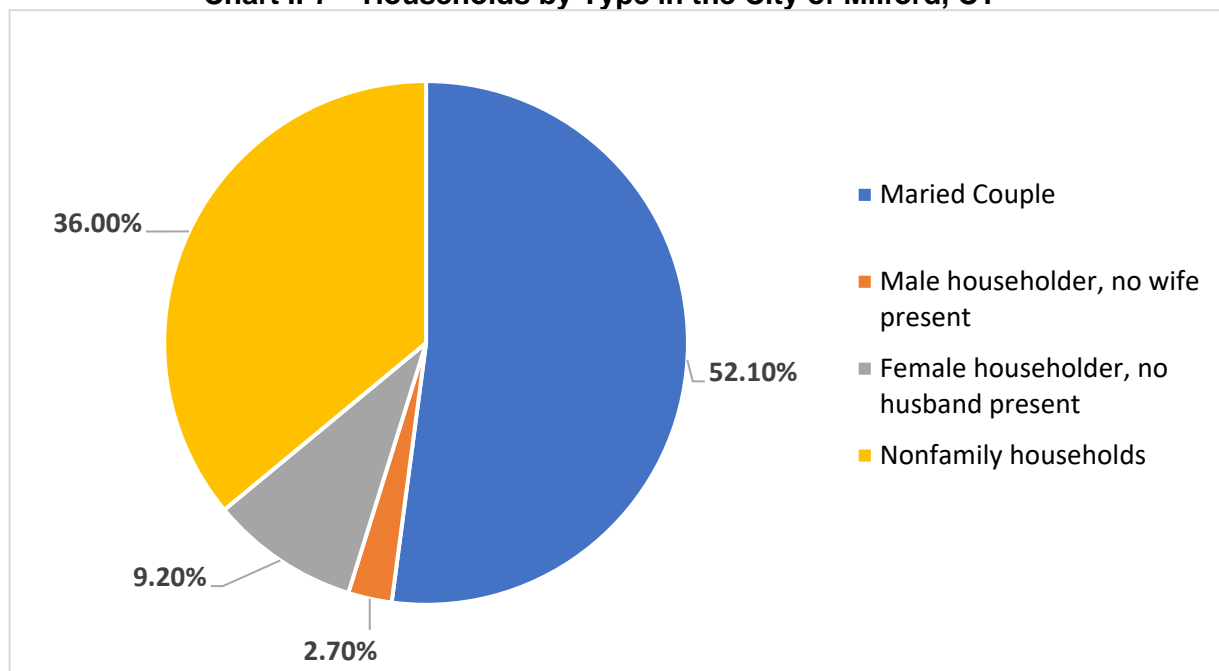


According to 2008-2012 American Community Survey data, non-family households comprised 34.9% of all households, married-couple family households comprised 52.1% of all households, female householders with no husband present comprised 9.3% of all households, and male householders with no wife present comprised 3.6% of all households in the City

In 2017, non-family households comprised 36.0% of all households, married-couple family households comprised 52.1% of all households, female householders with no husband present comprised 9.2% of all households, and male householders with no wife present comprised 2.7% of all households in the City. Data shows there has been an increase in non-family households, while percentage of married couple households remained the same.

The chart below illustrates the breakdown of households by type, in the City of Milford, as of 2017 using data from the 2013-2017 ACS.

Chart II-7 – Households by Type in the City of Milford, CT



Source: 2013-2017 ACS Data



C. Income and Poverty:

In 2017, the median household income for the City of Milford was \$86,382, higher than \$67,128 for New Haven County, and \$76,106 for the State of Connecticut. Table II-7 illustrates household income trends.

Table II-7 – Household Income in the City of Milford, CT

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	21,071	--	21,634	--
Less than \$5,000	274	1.3%	516	2.4%
\$5,000 to \$9,999	316	1.5%	401	1.9%
\$10,000 to \$14,999	737	3.5%	594	2.7%
\$15,000 to \$19,999	759	3.6%	536	2.5%
\$20,000 to \$24,999	885	4.2%	879	4.1%
\$25,000 to \$34,999	1,264	6.0%	1,234	5.7%
\$35,000 to \$49,999	2,065	9.8%	2,035	9.4%
\$50,000 to \$74,999	3,624	17.2%	3,240	15.0%
\$75,000 to \$99,999	3,203	15.2%	3,026	14.0%
\$100,000 to \$149,999	4,130	19.6%	4,783	22.1%
\$150,000 or more	3,835	18.2%	4,390	20.3%
Median household income (dollars)	\$79,531	--	\$86,382	--

Source: 2008-2012 and 2013-2017 ACS

Table II-8 identifies the Section 8 Income Limits in the Milford-Ansonia-Seymour HUD Metro Fair Market Rent Area based on household size for FY 2020. The Median Family Household Income for a family of 4 living in the Milford-Ansonia-Seymour HUD Metro Fair Market Rent Area was \$108,200 in 2020.



Table II-8 – Section 8 Income Limits for 2020 for the Milford-Ansonia-Seymour CT HUD Metro Fair Market Rent Area

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits (\$)*	\$22,750	\$26,000	\$29,250	\$32,450	\$35,050	\$37,650	\$40,250	\$44,120
Very Low (50%) Income Limits (\$)	\$37,900	\$43,300	\$48,700	\$54,100	\$58,450	\$62,800	\$67,100	\$71,450
Low (80%) Income Limits (\$)	\$54,950	\$62,800	\$70,650	\$78,500	\$84,800	\$91,100	\$97,350	\$103,650

Data obtained from hud.gov

* The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low (30%) income limits may equal the very low (50%) income limits.

In **Table II-9** the highlighted lines indicate the low- and moderate-income block groups in the City of Milford, based on the Upper Quartile.

Table II-9 – Low- and Moderate-Income in the City of Milford, CT

TRACT	BLK GRP	LOW/MOD	LOWMOD UNIV	LOWMOD PCT
150100	1	405	1065	38.03%
150100	2	330	1050	31.43%
150100	3	580	1720	33.72%
150200	1	870	2310	37.66%
150200	2	355	1105	32.13%
150300	1	485	1405	34.52%
150300	2	435	1230	35.37%
150300	3	265	810	32.72%
150300	4	510	960	53.13%
150400	1	650	1550	41.94%
150400	2	500	1100	45.45%
150400	3	515	885	58.19%
150400	4	220	640	34.38%
150500	1	275	990	27.78%
150500	2	460	1165	39.48%
150500	3	280	875	32.00%
150500	4	340	1065	31.92%
150600	1	145	895	16.20%

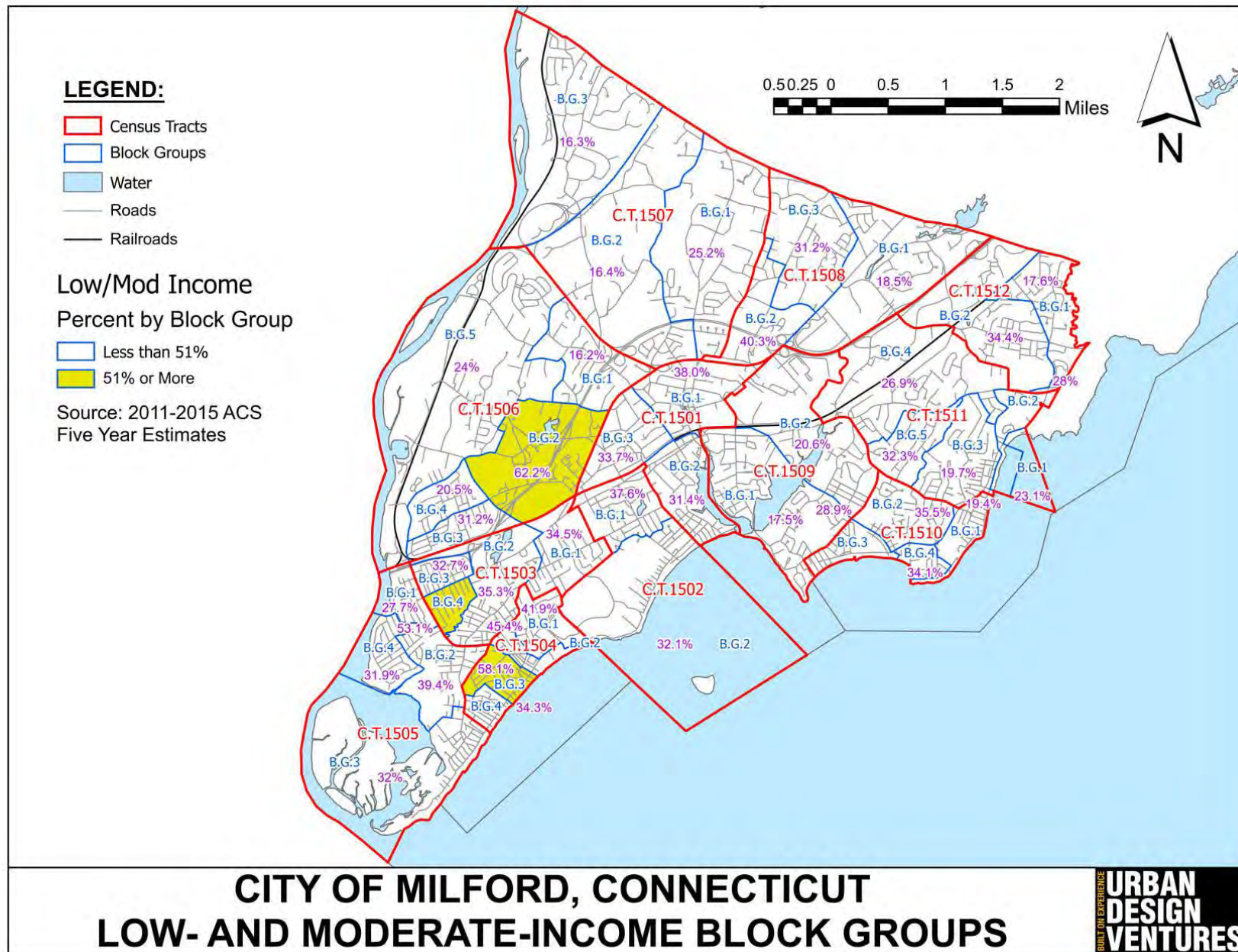


150600	2	420	675	62.22%
150600	3	245	785	31.21%
150600	4	140	680	20.59%
150600	5	900	3750	24.00%
150700	1	465	1845	25.20%
150700	2	205	1245	16.47%
150700	3	250	1530	16.34%
150800	1	285	1535	18.57%
150800	2	325	805	40.37%
150800	3	480	1535	31.27%
150900	1	485	2760	17.57%
150900	2	235	1140	20.61%
151000	1	115	590	19.49%
151000	2	600	1690	35.50%
151000	3	285	985	28.93%
151000	4	215	630	34.13%
151100	1	175	755	23.18%
151100	2	280	1000	28.00%
151100	3	465	2360	19.70%
151100	4	495	1840	26.90%
151100	5	265	820	32.32%
151200	1	260	1470	17.69%
151200	2	525	1525	34.43%
City of Milford Total:		15,735	52,770	29.82%

Note: The Upper Quartile C.T./B.G. are highlighted
Data obtained from hud.gov

Slightly less than half (29.82%) of all residents in the City of Milford were considered low- to moderate-income at the time of the 2011-2015 American Community Survey. According to 2013-2017 American Community Survey data, 3,241 (6.1%) of the population in the City of Milford was living below the poverty level. In comparison, 12.1% of the population of New Haven County and 10.1% of the population in the State of Connecticut shared the same poverty status in 2017. This is a slight increase from the 2008-2012 American Community Survey poverty rates. In 2012 the poverty rate was 4.7% for the City of Milford; 12.0% for New Haven County; and 10.0% for the State of Connecticut.

The following maps illustrate the percentages of Low-Income Population and Low-Income/Minority Population by Block Group in the City of Milford.



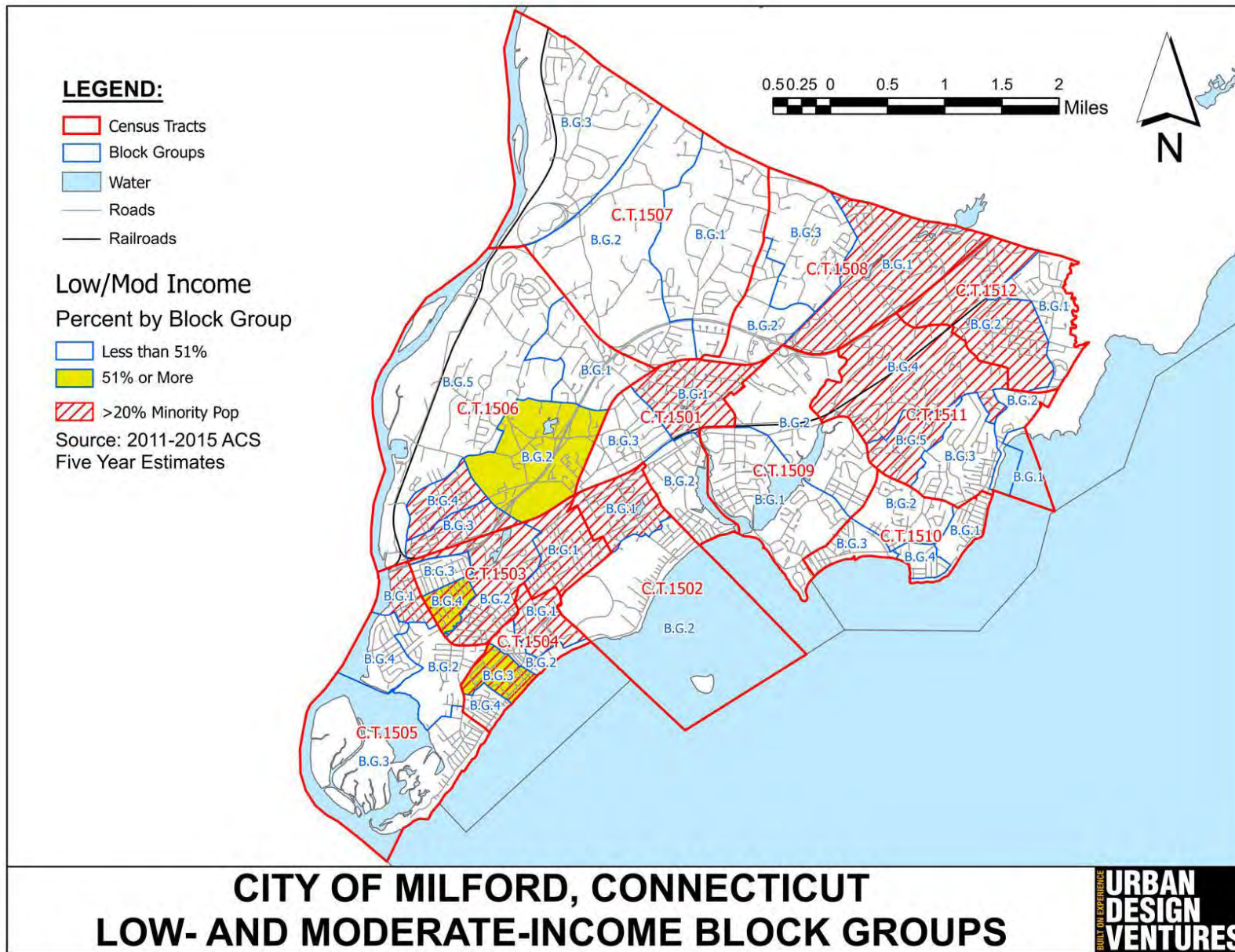


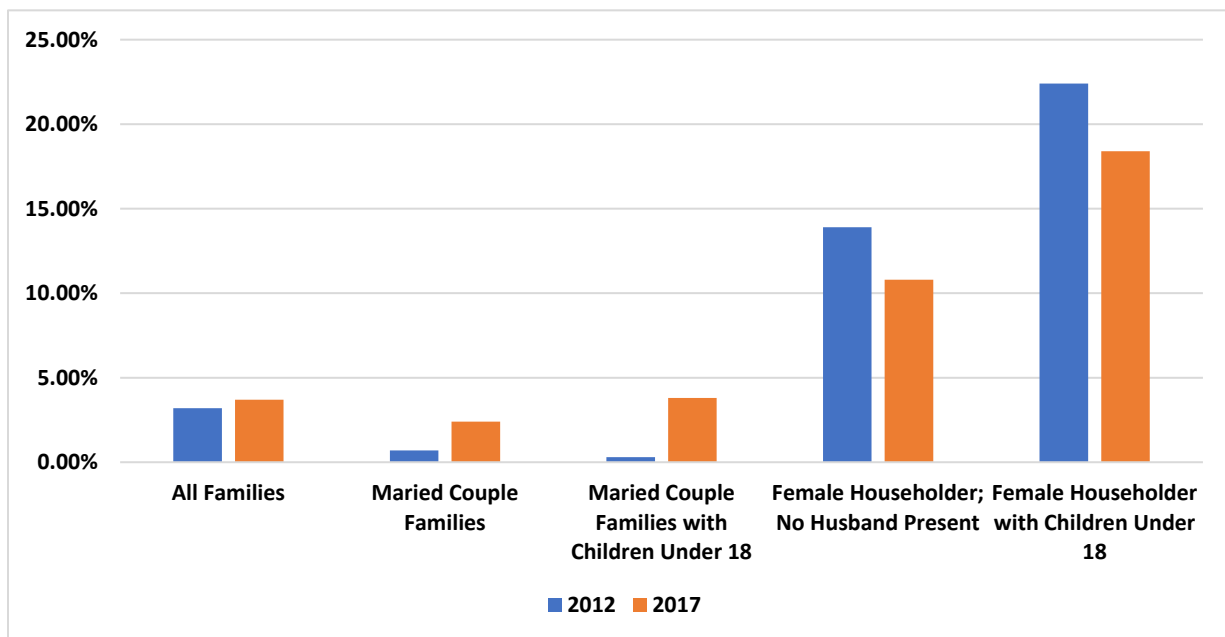


Chart II-8 illustrates the poverty statistics for families living in the City of Milford at the time of the 2008-2012 and 2013-2017 American Community Survey. Poverty rates for all households have increased between the time of the 2008-2012 and the 2013-2017 American Community Surveys.

The poverty rate of all families in the City of Milford during the time of the 2013-2017 American Community Survey was 3.7%. Of those families in poverty the breakdown is as follows:

- Married Couple families with related children under 18 was 3.8%
- Female-headed families with related children under the age of 18 was 18.4%

Chart II-8 – Percent of Families in Poverty in the City of Milford, CT



Source: 2008-2012 and 2013-2017 ACS

D. Employment:

In 2012, according to 2008-2012 American Community Survey estimates, the total number of eligible workers (population 16 years and over) in the City of Milford was 45,997 persons. In 2012, 71.2% of eligible workers were in the labor force and 7.6 of eligible workers in the work force were unemployed.

According to 2013-2017 American Community Survey estimates, the total number of eligible workers (population 16 years and over) in the City of



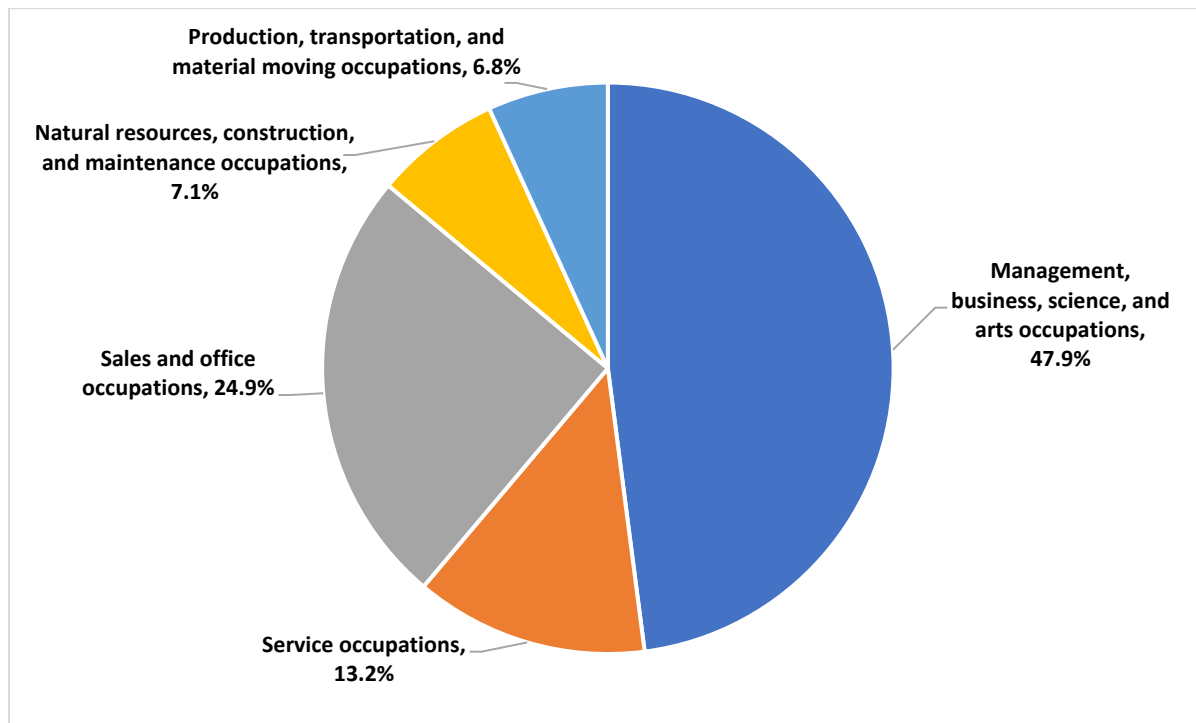
Milford was 45,637 persons. In 2017, 67.1% of eligible workers were in the labor force and 5.3% of eligible workers in the work force were unemployed.

According to the 2013-2017 American Community Survey workers had a mean travel time to work of 28.0 minutes.

According to the 2013-2017 American Community Survey, an estimated 32.0% (6,933 households) of households in the City of Milford receive income from Social Security. The mean Social Security Income for 2017 was \$20,323.

The following charts outline the distribution of the City of Milford workers by occupation.

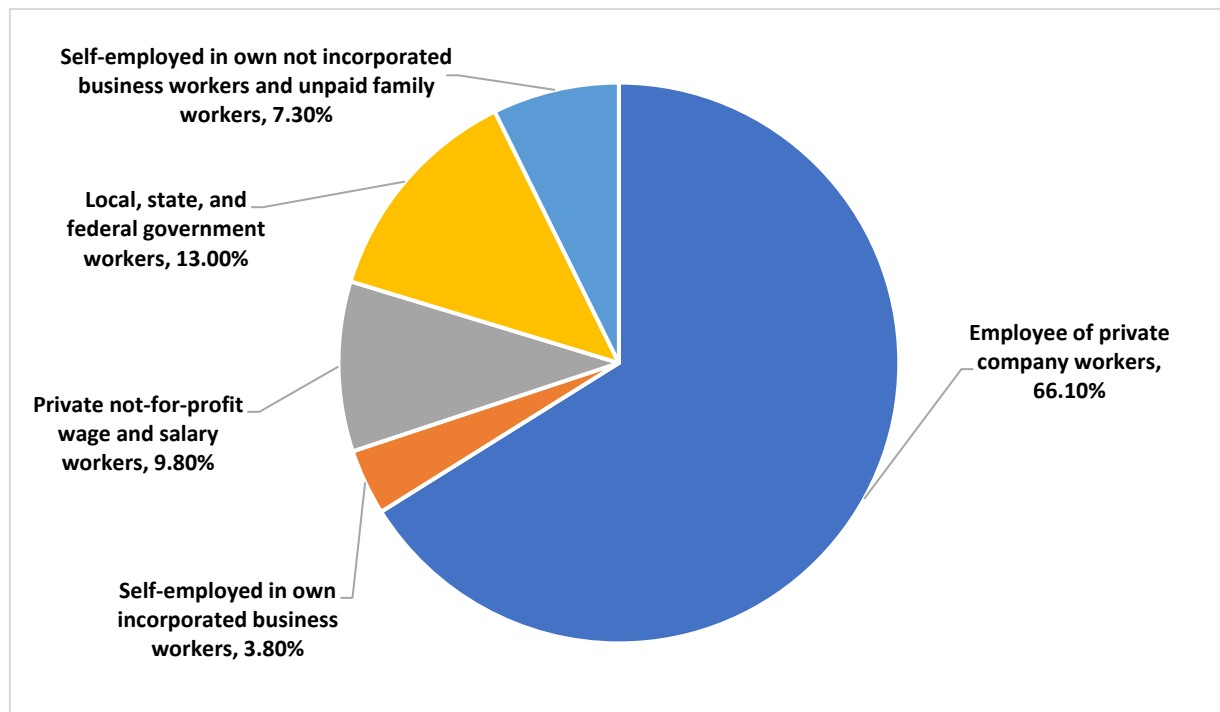
Chart II-9 – Milford Occupations



Source: 2013-2017 American Community Survey



Chart II-10 –Milford Class of Worker



Source: 2013-2017 American Community Survey

Chart II-11 illustrates the unemployment rate trends for the City of Milford from January 2010 through May 2020 from the Bureau of Labor Statistics (www.bls.gov).

Chart II-11 – Milford Area Unemployment Rate



Source: <http://data.bls.gov>



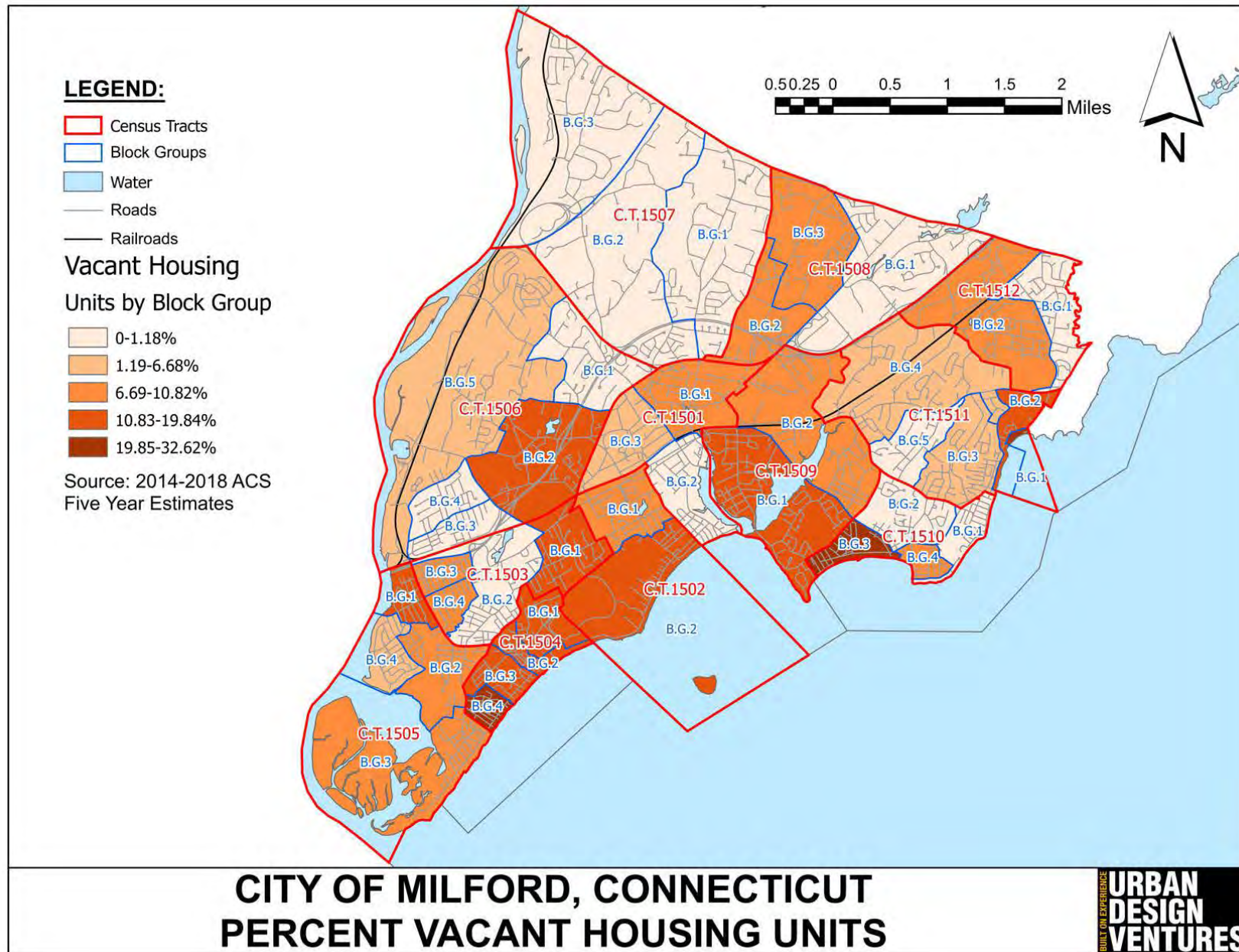
In December 2019, Milford experienced its lowest unemployment rate at 2.9% within the last ten years; it is important to note that the Milford unemployment rate reached 9.2% in May 2020 due to the Coronavirus lockdowns. Prior to COVID-19, the City of Milford had experienced a steady reduction in unemployment in the past ten years.

This was slightly lower compared to the State of Connecticut unemployment rate of 9.6% for May of 2020.

E. Housing Profile:

According to the 2013-2017 ACS, there are 24,053 housing units in the City of Milford, of which 91.7% are occupied; this leaves a vacancy rate of 8.3% in the City. Vacant housing units are located mainly by Burwell Beach, Bayview Beach and Wildermere Beach. These units might be vacation homes and only vacant part of the year.

The following maps illustrate the percentage of Vacant Housing Units by Block Group in the City of Milford.





Based on the 2013-2017 American Community Survey Data, the City of Milford has consistently constructed over one thousand homes each decade since the 1940's until the previous decade in which construction slowed significantly to 337 homes built in 2010 and later. **Table II-10** illustrates the year that housing structures were built in the City of Milford based on the 2013-2017 American Community Survey.

Table II-10 – Year Structure Built in the City of Milford, CT

Housing Profile	2013-2017 ACS	
	#	%
Total Housing Units	23,571	--
Built 2014 or later	42	0.2%
Built 2010 to 2013	337	1.4%
Built 2000 to 2009	1,733	7.4%
Built 1990 to 1999	2,271	9.6%
Built 1980 to 1989	2,303	9.8%
Built 1970 to 1979	2,927	12.4%
Built 1960 to 1969	3,162	13.4%
Built 1950 to 1959	4,137	17.6%
Built 1940 to 1949	2,123	9.0%
Built 1939 or earlier	4,536	19.2%

The State of Cities Data Systems (SOCDS) provides series of data for individual Metropolitan Areas, Central Cities, and Suburbs. The following table illustrates the number of permits issued during the January-December 2019 (most recent available) period for residential construction collected by the Census Bureau's Building Permit Survey:



Table II-11 – Number of Residential Permits Issued in the Milford Permitting Jurisdiction

Year	Single Family	Multi Family	Total
2009	20	66	86
2010	24	66	90
2011	16	80	96
2012	22	123	145
2013	28	161	189
2014	29	188	217
2015	28	330	358
2016	29	149	178
2017	33	161	194
2018	32	135	167
2019*	28	167	195

Source: State of Cities Data Systems (SOCDS) CBSA
*Jan.-Dec. 2019

Table II-12 – Number of Residential Permits Issued in the Milford Permitting Jurisdiction by Month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Single Family	2	2	3	3	3	3	1	2	2	2	3	2	28
Multi-Family	13	10	12	13	9	11	24	15	12	15	16	17	167
Total	15	12	15	16	12	14	25	17	14	17	19	19	195

Source: State of Cities Data Systems (SOCDS) CBSA

From January through December 2019 the Milford Permitting Jurisdiction issued on average of 16.25 residential permits per month. The Permitting Jurisdiction issued the highest number of permits during the month of July, issuing twenty-five (25) permits. The majority of permits issued for the whole year were for multi-family residences.



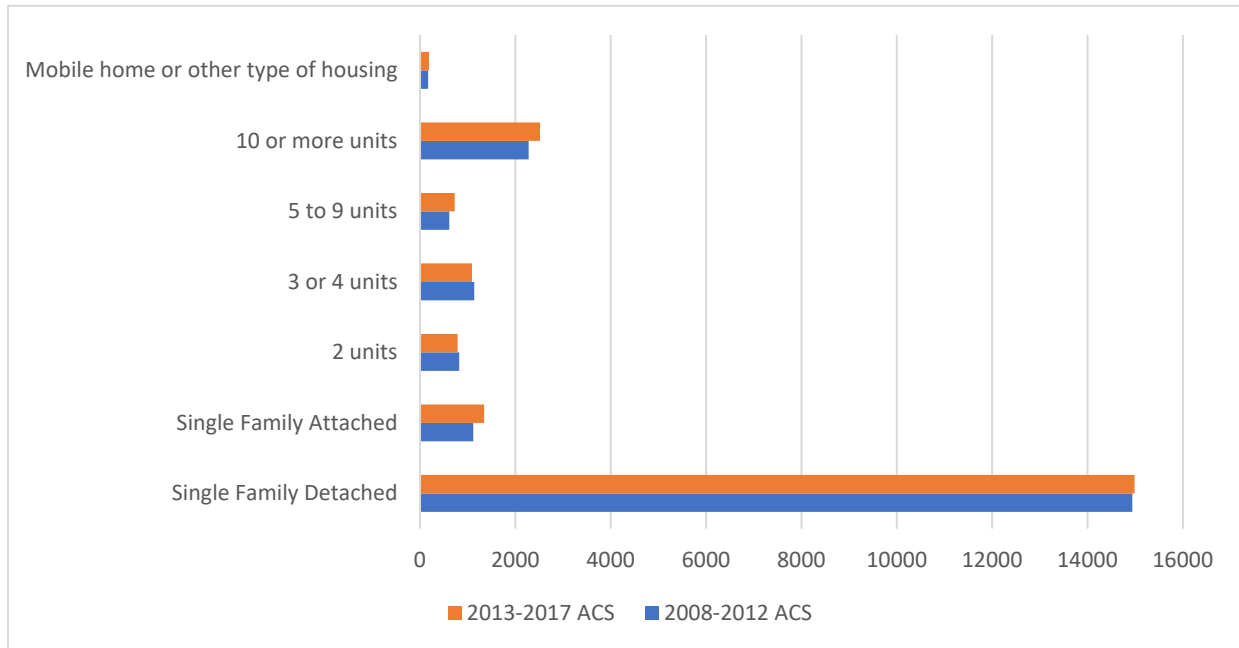
According to 2008-2012 American Community Survey data in 2012, the City's housing stock primarily consisted of single-family detached (70.9%) and 10 or more apartments (10.8%). In 2012, multi-family units in the City of Milford consisted of: two units (3.9%); three to four units (5.4%); five to nine units (2.9%); and ten or more units (10.8%). Mobile homes made up 0.8% of the housing stock. The median value of owner-occupied homes in the City of Milford in 2012 was \$321,500 compared to \$263,900 for New Haven County and \$285,900 for the State of Connecticut.

Similarly, by 2017, according to the 2013-2017 American Community Survey data, the City's housing stock primarily still consisted of single-family units, both attached 1,345 (6.2%), and detached 14,984 (69.3%). In 2017, multi-family units in the City of Milford consisted of: two units 788 (3.6%); three to four units 1,089 (5.0%); five to nine units 727 (3.4%); and ten or more units 2,515 (11.6%). Mobile homes made up 0.9% of the housing stock. The median value of owner-occupied homes in the City of Milford in 2017 declined to \$303,200, compared to \$244,400 for New Haven County and \$270,100 for the State of Connecticut, which also declined.

Overall, the values of the housing stock in the City of Milford are higher than those of New Haven County and the State of Connecticut, as a whole, and have been decreasing since 2012. **Chart II-12** shows the change in types of housing stock.



Chart II-12 – Housing Stock Type in the City of Milford, CT



Source: 2008-2012 & 2013-2017 American Community Survey

F. Financing:

Owner Costs

The median monthly mortgage expense in the City of Milford according to the 2013-2017 American Community Survey was \$2,152, compared to \$2,273 in 2008-2012. **Table II-13** illustrates mortgage status and selected monthly owner costs. Monthly owner costs decreased by 5.3%, while median income during the same period increased by approximately 8.6%.

The number of homes in Milford without a mortgage slightly increased from 25.3% in 2012 to 29.8% in 2017. This is most likely due to the overall increase in owner occupied housing in the City changing from 16,261 in 2012 to 16,525 in 2017, and the aging population which is paying off their mortgages.



Table II-13 – Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a Mortgage	12,141	74.7%	11,602	70.2%
Less than \$200	0	0.00%	0	0.00%
\$200 to \$399	49	0.40%	11	0.10%
\$400 to \$599	24	0.20%	51	0.40%
\$600 to \$799	182	1.50%	156	1.30%
\$800 to \$999	328	2.70%	273	2.40%
\$1,000 to \$1,499	1384	11.40%	1,589	13.70%
\$1,500 to \$1,999	2392	19.70%	2,830	24.40%
\$2,000 or more	7770	64.00%	6,692	57.60%
Median (dollars)	2,273	--	2,152	--
Houses without a Mortgage	4,120	25.3%	4,923	29.8%

Source: 2008-2012 and 2013-2017 American Community Survey

Over one-third (34.4%) of all owner-occupied households with a mortgage are paying over 30% of their monthly income on housing, indicating a relatively high percentage of owners whose housing is not considered affordable. **Table II-14** illustrates housing costs for owner-households.

Table II-14 – Selected Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Housing Units with a Mortgage	12,141	74.7%	11,602	70.2%
Less than 20 percent	3,375	27.8%	4,138	35.7%
20 to 29.9 percent	3,679	30.3%	3,449	29.7%
30 percent or more	5,063	41.7%	3,993	34.4%
Housing Units without a Mortgage (Excluding those whose monthly costs cannot be calculated)	4,120	25.3%	4,923	29.8%

Source: 2008-2012 and 2013-2017 American Community Survey



To determine the median list prices of homes in the City of Milford, the City researched listings through Trulia Real Estate at [trulia.com](https://www.trulia.com), [realtor.com](https://www.realtor.com), and [Zillow.com](https://www.zillow.com). As of July 2020, there were 210 homes listed for sale in the City of Milford according to [Zillow.com](https://www.zillow.com).

Data from each of these sources vary, however, not all data was available for the same month. According to [trulia.com](https://www.trulia.com) the median **sale** prices of homes was \$297,100 for March 2020. [Zillow.com](https://www.zillow.com), a similar website, indicates their median **sale** price also as \$297,100 and the median list price as \$329,950 for June 2020. Data collected from [realtor.com](https://www.realtor.com) indicates the median **list** price of homes for June, 2020 was \$349,900. It is likely the data is different among these sources because some houses may be listed outside of the Milford City proper area.

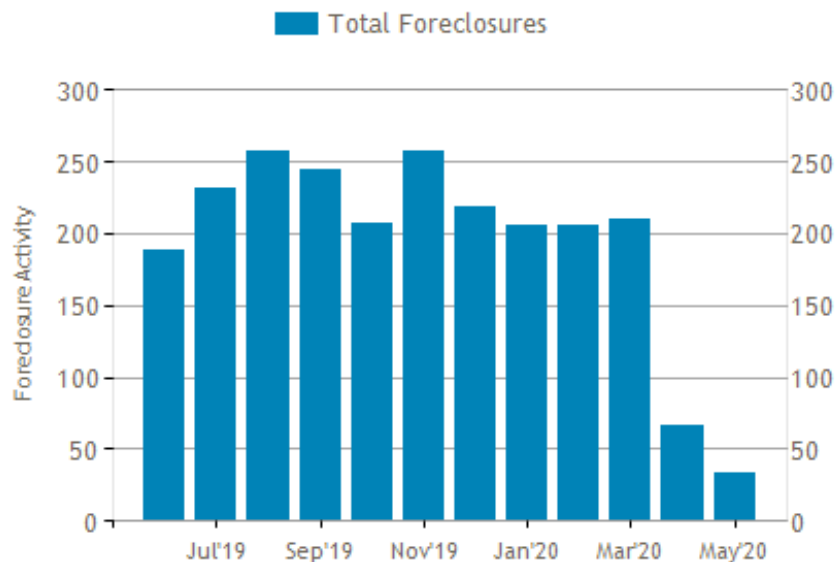
The median value of owner-occupied homes in the City of Milford in 2017 was \$303,200 compared to \$244,400 for New Haven County and \$270,100 for the State of Connecticut according to the 2013-2017 American Community Survey. However, the percent of people living in poverty in Milford is 6.1%, compared to 12.1% for New Haven County and 10.1% in Connecticut. Over one-third (34.4%) owner-occupied households in the City of Milford with a mortgage are paying over 30% of their monthly income on housing, indicating a relatively high percentage of owners whose housing is not considered affordable, compared to a similar percentage in New Haven County (34.3%) and nearly a third in the Connecticut (32.6%).

Foreclosures

According to [RealtyTrac](https://www.realtytrac.com), the City of Milford had only seven (7) properties in some stage of foreclosure in April, 2020. There is not enough available data to calculate a foreclosure rate in Milford. However, New Haven County experienced a foreclosure rate of 1 in every 5,706 housing units, and the State of Connecticut had a foreclosure rate of 1 in every 10,398 housing units. The following chart illustrates the monthly foreclosure filings in New Haven County from June 2019 to May 2020.



Chart II-12 – Foreclosures in New Haven County, CT



Source: www.realtytrac.com

The number of foreclosures for the City of Milford was at its highest in August and November 2019 with nearly 260 foreclosures.

Renter Costs

The median monthly rent increased by 10.2% between 2012 and 2017, from \$1,396 to \$1,539, respectively. **Table II-15A** illustrates rental rates within the City at the time of the 2008-2012 and **Table II-15 B** illustrates rental rates within the City at the time of the 2013-2017 American Community Survey. The tables are split because the ACS changed the monthly renter cost categories.

Table II-15A – Gross Monthly Rent

Monthly Renter Cost	2008-2012 ACS	
	Number of Housing Units	Percentage
Renter-Occupied Units Paying Rent	4,587	--
Less than \$200	14	0.3%
\$200 to \$299	109	2.4%
\$300 to \$499	203	4.4%
\$500 to \$749	174	3.8%



\$750 to \$999	475	10.4%
\$1,000 to \$1,499	1,660	36.2%
\$1,500 or more	1,952	42.6%
No Rent Paid	223	4.9%
Median (dollars)	1,396	--

Source: 2008-2012 American Community Survey

Table II-15B – Gross Monthly Rent

Monthly Renter Cost	2013-2017 ACS	
	Number of Housing Units	Percentage
Renter-Occupied Units Paying Rent	4,907	--
Less than \$500	358	7.3%
\$500 to \$999	610	12.4%
\$1,000 to \$1,499	1,342	27.3%
\$1,500 to \$1,999	1,844	37.6%
\$2,000 to \$2,499	422	8.6%
\$2,500 to \$2,999	157	3.2%
\$3,000 or more	174	3.5%
No Rent Paid	202	4.1%
Median (dollars)	1,539	--

Source: 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. The monthly housing costs for nearly half (49.8%) of all renter-occupied households exceeded 30% of monthly income in 2012, indicating an even higher percentage of renters whose housing is not considered affordable. In 2017, that amount increased to 51.9%, which is a 2.1% increase in the number of renters paying more than 30% of their income. **Table II-16** illustrates the housing cost for renter-households.

Table II-16 – Gross Rent as a Percentage of Household Income

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	4,486	--	4,841	--
Less than 15 percent	495	11.0%	594	12.3%
15 to 19.9 percent	500	11.1%	737	15.2%



20 to 24.9 percent	823	18.3%	718	14.8%
25 to 29.9 percent	435	9.7%	280	5.8%
30 to 34.9 percent	402	9.0%	485	10.0%
35 percent or more	1,831	40.8%	2,027	41.9%
Not computed	324	7.2%	268	5.5%

Source: 2008-2012 and 2013-2017 American Community Survey

The 2020 Fair Market Rents for the Milford-Ansonia-Seymour, CT HUD Metro FMR Area are shown in **Table II-17** below.

Table II-17 – FY 2020 and FY 2019 FMR by Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2020 FMR	\$897	\$1,118	\$1,376	\$1,715	\$2,143
FY 2019 FMR	\$881	\$1,111	\$1,373	\$1,720	\$2,078

Source: www.hud.gov

[Zillow.com](https://www.zillow.com) rental listings were reviewed on June 30, 2020 for rental listings and rates. According to [Zillow.com](https://www.zillow.com) the median rental price over the past 12 months for the City of Milford is \$1,900 for market rate units. Of the rental listings posted, one-bedroom apartments rented for an average price of \$1,487.23; two-bedroom apartments rented for an average of \$2,106.10; three-bedroom apartments rented for an average of \$3,243.33. One listing for a one-bedroom apartment explicitly stated “no pets”, which is problematic for individuals with disabilities or other needs that require a trained and certified Service Animal. One listing for another one-bedroom explicitly stated, “good credit needed” in order to be eligible for renting, while another required a minimum credit score of 650.

G. Household Types:

Based on a comparison between 2009 and 2011-2015 American Community Survey estimates, the City of Milford’s population increased by 1%. The median income of the Milford area increased by 5%, however, when adjusting for inflation, the purchasing power is weaker.



Table II-18 – Changes Between 2009 & 2015

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	52,759	53,210	1%
Households	22,387	21,255	-5%
Median Household Income	\$76,175.00	\$80,247.00	5%

Data Source: 2009 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Table II-19 - Number of Households

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	2,715	2,285	2,405	1,810	12,045
Small Family Households *	570	580	725	730	6,630
Large Family Households *	45	60	99	120	785
Household contains at least one person 62-74 years of age	615	564	685	515	2,540
Household contains at least one-person age 75 or older	814	850	414	170	574
Households with one or more children 6 years old or younger *	294	250	144	280	862

* the highest income category for these family types is >80% HAMFI

Data Source: 2011-2015 CHAS



A household is considered to have a housing problem if it is cost burden by more than 30% of their income, is experiencing overcrowding, or has incomplete kitchen or plumbing facilities. The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; and cost burden greater than 30%. The following tables illustrate the households that have one or more housing problems, and those that are cost burdened.

Table II-20 – Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	80	0	10	0	90	0	0	15	0	15
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	25	10	10	0	45	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	0	15	15	0	0	0	10	10
Housing cost burden greater than 50% of income (and none of the above problems)	830	434	179	4	1,447	1,035	740	510	70	2,355
Housing cost burden greater than 30% of income (and none of the above problems)	210	155	245	195	805	164	520	490	500	1,674
Zero/negative Income (and none of the above problems)	125	0	0	0	125	84	0	0	0	84

Data Source: 2011-2015 CHAS



**Table II-21 – Housing Problems (Households with one or more Severe Housing Problems:
Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	935	439	194	20	1,588	1,035	740	525	80	2,380
Having none of four housing problems	370	285	440	420	1,515	164	820	1,245	1,285	3,514
Household has negative income, but none of the other housing problems	125	0	0	0	125	84	0	0	0	84

Data Source: 2011-2015 CHAS

Table II-22 – Cost Burdened Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	289	295	169	753	230	240	304	774
Large Related	0	10	14	24	45	35	60	140
Elderly	459	208	97	764	698	818	314	1,830
Other	349	95	145	589	235	164	345	744
Total need by income	1,097	608	425	2,130	1,208	1,257	1,023	3,488

Data Source: 2011-2015 CHAS



Table II-23 – Cost Burdened Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	289	235	40	564	220	200	194	614
Large Related	0	0	0	0	45	35	0	80
Elderly	359	143	48	550	569	388	165	1,122
Other	209	60	90	359	210	114	170	494
Total need by income	857	438	178	1,473	1,044	737	529	2,310

Data Source: 2011-2015 CHAS

Table II-24 – Overcrowding Conditions (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	25	10	10	15	60	0	0	0	0	0
Multiple, unrelated family households	0	0	0	0	0	0	0	0	10	10
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	25	10	10	15	60	0	0	0	10	10

Data Source: 2011-2015 CHAS



According to the 2013-2017 American Community Survey (ACS), there were 21,634 households in 2017 in the City of Milford. Based on this data, 6,402 (29.6%) of all households were single person households living alone. Single person households aged 65 and over comprised 2,670 households, or 12.3% of all single person households. It is presumed that as these seniors age in place, additional accommodations and the need for special care will be necessary for this portion of the City's population. The City will need to assist with funding for housing and elderly service agencies to provide programs, activities, and accommodations for its elderly population. Of the householders over the age 65 and living alone, the majority are females (2,037) compared to males (633).

Disabled Population – Based on the 2013-2017 ACS data, a total of 5,585 individuals (10.4% of the population) have a disability. Of the 5,585 individuals who have a disability: 3.1% have a hearing difficulty; 1.8% have a vision difficulty; 4.1% have a cognitive difficulty; 5.5% have an ambulatory difficulty; 2.1% have a self-care difficulty; and 5.0% have an independent living difficulty.

In consultations, interviews and surveys, the lack of affordable accessible housing for people with disabilities, especially those with durable medical equipment, is an unmet housing need and problem.

The elderly and disabled populations are the most affected by the high cost of housing in the City of Milford. Many of the elderly and disabled are on fixed or limited incomes and are unable to afford basic repairs to the interior and exterior of the home. Additionally, the lack of maintenance, repairs and weatherization measures in these homes leads to high utility costs, especially in the winter months. The inability to pay utility bills can lead to shutoffs and loss of access to basic needs. The lack of affordable housing that is decent, safe, and sound forces low-income persons into below code standard housing that is often non-accessible.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking – based on the Connecticut Family Violence Arrest 2018 Report, there were 181 total Family Violence incidents where an arrest occurred in 2018 within the City of Milford. This is down from the previous year, with 183 total Family Violence incidents that resulted in an arrest. According to the 2018 report, there were 16,954 reported incidents of Family Violence in 2018 in the entire state of Connecticut, which was a 0.6% increase (109 incidents) from the previous year (16,584). The 2018 report cites a 2001 study by Mears and Carlson *et al*, stating that socioeconomic status of a victim is related to increased risk of renewed abuse after a protection order has been placed.



The Umbrella Center for Domestic Violence Services is a shelter in Ansonia that services the area. Umbrella's services include a temporary emergency shelter, emergency local transportation, crisis intervention services, case management, and food, clothing, emergency cell phones, creation of a safety plan, and domestic violence education.

Homelessness –

The other groups significantly affected by the lack of affordable housing are the homeless and persons at-risk of becoming homeless, including those who are victims of domestic violence.

The State of Connecticut is divided up into seven (7) Coordinated Access Networks (CANs). The area servicing the City of Milford is the Greater New Haven CAN. The Greater New Haven CAN offers various services to help meet the basic needs of low-to-moderate income persons. This assistance includes crisis assistance; information and referral; energy programs; monthly food pantry; housing assistance programs; housing counseling; property assistance programs; and transportation assistance.

According to the Point-in-Time count for the Greater New Haven Coordinated Access Network for 2019, there was a total of 645 people counted as 'homeless'. Of those 645 people: 5 were identified as unaccompanied youth (ages 18-24); 28 were identified to be chronically homeless; there were 273 homeless females counted; 357 homeless males; and 1 homeless transgender person. Of the 645 people counted as 'homeless' 538 were in emergency or transitional housing, and 107 were unsheltered.

Individuals experiencing homelessness often face higher rates of substance abuse and mental illness. Their exacerbated symptoms such as the ability to cope with their surroundings, become strained. According to Beth-El Center, the majority of their clients have had substantial or long-term untreated mental health issues or substance abuse issues. The Center identifies a need for supportive services that engage specifically with this population for early prevention. Beth-El Center is the primary provider of housing and supportive services for the City of Milford's homeless and at risk of being homeless population and is a participating member of the Connecticut Balance of State Continuum of Care. Beth-El primarily operates an emergency shelter year round, but also serves as a No Freeze Emergency Shelter and a soup kitchen, and provides support services such as case management for people at-risk of becoming homeless. The No Freeze Emergency Shelter operates from 9 PM to 7 AM whenever temperatures reach below 32 degrees during winter months, typically from November to March, with the possibility of extending service.



The consequences of unaccompanied youth and homelessness are vast. Youth experiencing homelessness are more likely to have mental health problems and challenges, substance abuse disorders, have an increased risk of pregnancy, and criminal activity and victimization, all leading to possible barriers to further education and employment opportunities, which ultimately leads to fair housing issues. The State of Connecticut's Balance of State Continuum of Care's Coordinated Access Networks each have Youth Navigators that help unaccompanied youth. Youth Navigators and the Balance of State have worked with schools and the Department of Children and Families to reunite youth with their families, or have offered mediation. Many under 18 leave home because of family conflict, so the best way to approach that is to engage with the families.

Specific needs of the extremely low-income who are housed but are at imminent risk of becoming unsheltered or living in shelters, are: food, transportation and job training, including soft skills. Immediate needs are emergency rent, mortgage, and utility assistance for households that will become homeless if they are unable to pay their rent/mortgage and utility bills. The local social service agencies provide food and clothing through food pantries and soup kitchens. Others provide short term rental assistance, and down payment assistance. Job training programs are also available.

H. Cost Burden:

A central housing problem facing households in the City of Milford, CT is a lack of affordable housing and the fact that many of the City's lower income households are paying more than 30% of their total household income on the monthly cost for housing. The following information was noted: 3,964 households were cost burdened by 30% to 50%, and 3,895 households were cost burdened by greater than 50%. There were 3,535 White households cost burdened by 30% to 50%, and 3,330 that were cost burdened by over 50%; 65 Black/African American households were cost burdened by 30% to 50%, and 140 Black/African American households were cost burdened by greater than 50%; 229 Hispanic households were cost burdened by 30%-50%; 340 Hispanic households were cost burdened by over 50%; and lastly, 135 Asian households were cost burdened by 30% to 50% and 85 Asian households were cost burdened by over 50%.



Table II-25 – Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,104	4,004	3,950	214
White	11,655	3,535	3,330	164
Black / African American	195	65	140	0
Asian	650	135	85	10
American Indian, Alaska Native	25	0	0	0
Pacific Islander	0	0	0	0
Hispanic	400	229	340	35

Data Source: 2011-2015 CHAS

About 6,865 White households (36.7%) out of a total of 18,684 computed White households were considered cost burdened by 30% and greater in the City of Milford. Of the total Black/African American households in the City, there were 205 (51.3%) (Black/African American households out of a total of 400 that were cost overburdened by 30% and greater, over fourteen percent more than White households. In addition, there were 220 (25.0%) Asian households and 569 (56.7%) Hispanic households that were cost burdened by 30% and greater.

I. Housing Problems:

A household is considered to have a housing problem if it is cost burdened by more than 30% of their income, is experiencing overcrowding, or has incomplete kitchen or plumbing facilities. The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; and cost burden greater than 30%.

During the planning process for the preparation of the City of Milford's Five-Year Consolidated Plan, an evaluation and comparison was made to determine the needs of the racial/ethnic groups in comparison to the overall need in the City. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

Using the 2011-2015 CHAS Data, the total number of White Households in the City of Milford is 19,510 households (92.0%); the number of Black/African American Households is 444 households (2.1%); the number of American Indian and Alaska Native is 25 households (0.1%), the number of Asian Households is 880 households (4.1%); the number of Native



Hawaiian and Other Pacific Islander is 0 households (0%), and the number of Hispanic Households is 1,008 households (4.8%).

Note: the 2011-2015 ACS Data was used to match the same years as the 2011-2015 CHAS data available.

The following tables illustrate the disproportionate needs in the City of Milford:

Table II-26 – 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,345	160	209
White	1,945	160	164
Black / African American	100	0	0
Asian	65	0	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	190	0	35

Data Source: 2011-2015 CHAS

Table II-27 – 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,860	424	0
White	1,695	404	0
Black / African American	4	0	0
Asian	25	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	130	15	0

Data Source: 2011-2015 CHAS



Table II-28 – 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,455	945	0
White	1,195	920	0
Black / African American	70	0	0
Asian	80	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	80	10	0

Data Source: 2011-2015 CHAS

Table II-29 – 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	795	1,020	0
White	715	955	0
Black / African American	0	0	0
Asian	24	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	30	0

Data Source: 2011-2015 CHAS

There is only one racial/ethnic group disproportionately affected by housing problems: Hispanic or Latino households make up 4.8% of total households and 16.7% of those with housing problems within the 0-30% AMI group.



J. Disproportionately Greater Need: Severe Housing Problems:

A household is considered to have a housing problem if it is cost burdened by more than 30% of their income, experiencing overcrowding, or having incomplete kitchen or plumbing facilities. The four severe housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than 1.5 persons per room; and cost overburdened over 50%.

In order for the City of Milford to determine its goals and strategies, it must determine the extent to which any racial/ethnic group has a greater need in comparison to the City's overall population need. Data detailing information by racial group and Hispanic origin has been compiled from the CHAS data and the 2011-2015 American Community Survey. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons in that group as a whole. The following tables illustrate the disproportionate needs of the City of Milford.

Table II-30– 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,970	534	209
White	1,580	530	164
Black / African American	100	0	0
Asian	65	0	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	190	0	35

Data Source: 2011-2015 CHAS



Table II-31 – 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,179	1,105	0
White	1,029	1,075	0
Black / African American	4	0	0
Asian	15	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	130	15	0

Data Source: 2011-2015 CHAS

Table II-32 – 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	719	1,685	0
White	644	1,470	0
Black / African American	35	35	0
Asian	14	90	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	55	0

Data Source: 2011-2015 CHAS



Table II-33 – 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	100	1,705	0
White	84	1,575	0
Black / African American	0	0	0
Asian	0	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	70	0

Data Source: 2011-2015 CHAS

According to the 2011-2015 CHAS Data, the total number of White Households in the City of Milford is 19,510 households (92.0%); the number of Black/African American Households is 444 households (2.1%); the number of American Indian and Alaska Native is 25 households (0.1%), the number of Asian Households is 880 households (4.1%); the number of Native Hawaiian and Other Pacific Islander is 0 households (0%), and the number of Hispanic Households is 1,008 households (4.8%).

Note: the 2011-2015 ACS was used to match the same years as the 2011-2015 CHAS data available.

The Hispanic or Latino group earning 0%-30% Area Median Income is disproportionately affected by severe housing problems. The Black/African American group makes up 4.8% of households and 16.7% of households with severe housing problems in the 0%-30% AMI group.

K. Disabled Households:

Table II-34 includes the 2013-2017 American Community Survey data that shows the number of disabled individuals in the City of Milford. The total civilian population is 53,529 and the population with a disability is 5,585 or 10.4%. This is indicative of the need for housing for the disabled which are mainly low- and moderate-income, and do not have housing resources that are accessible and/or affordable.



Table II-34 – Disability Status for Residents in Milford, CT

Disability Status of the Civilian Non-Institutional Population	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	52,450	--	53,529	--
Total Population with a disability	5,444	10.4%	5,585	10.4%
Total population under 5 years	2,974	5.7%	2,542	4.7%
With a hearing difficulty	27	0.9%	0	0
With a vision difficulty	18	0.6%	0	0
Total population 5 to 17 years	8,031	15.3%	7,151	13.4%
With a hearing difficulty	34	0.4%	0	0
With a vision difficulty	63	0.8%	0	0
With a cognitive difficulty	237	3.0%	169*	2.4%*
With an ambulatory difficulty	37	0.5%	24*	0.3%*
With a self-care difficulty	53	0.7%	14*	0.2%*
Total population 18 to 64 years	33,292	63.5%	34,318	64.1%
With a hearing difficulty	481	1.4%	433	1.3%
With a vision difficulty	373	1.1%	444	1.3%
With a cognitive difficulty	947	2.8%	1,192	3.5%
With an ambulatory difficulty	1,212	3.6%	1,043	3.0%
With a self-care difficulty	480	1.4%	433	1.3%
With an independent living difficulty	850	2.6%	1,334	14.0%
Total population 65 years and over	8,153	15.5%	2,834	5.3%
With a hearing difficulty	1,164	14.3%	1,247	13.1%
With a vision difficulty	334	4.1%	506	5.3%
With a cognitive difficulty	607	7.4%	742	7.8%
With an ambulatory difficulty	1,454	17.8%	1,735	18.2%
With a self-care difficulty	520	6.4%	638	6.7%
With an independent living difficulty	1,401	17.2%	1,334	14.0%
Sex				
Male with a disability	2,434	9.5%	2,358	9.0%
Female with a disability	3,010	11.3%	3,227	11.8%
Race with a disability				
White alone	4,998	10.8%	5,256	11.0%
Black or African American alone	121	9.6%	92	5.5%



American Indian and Alaska Native alone	17	17.7%	0	0
Asian alone	186	5.8%	138	4.9
Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0
Some other race alone	96	17.8%	31	5.7%
Two or more races	26	2.8%	68	7.7%
White alone, not Hispanic or Latino	4,856	10.9%	5,157	11.5%
Hispanic or Latino (of any race)	235	9.2%	131	3.6%

Source: 2008-2012 & 2013-2017 American Community Survey
*Population aged 17 and under

Of the population age 65 and older, 2,629 (32.2%) have a disability. Of the total population, women have a marginally higher rate of disabilities than men (11.3% and 9.5%, respectively).

The disparities between individuals who “are” and who “are not” disabled can also be seen in the employment statistics.

According to the 2013-2017 American Community Survey, 33.1% of disabled persons ages 18 to 64 years old in the labor force are employed, whereas 81.5% of non-disabled persons ages 18 to 64 in the labor force are employed. There are 28,310 individuals aged 18 to 64 who are in the labor force of the City of Milford. Of those 221 individuals have a disability (0.7%) and are unemployed. Of the 6,008 individuals identified as ‘not in the labor force’, a total of 1,490 (24.8%) are individuals with disabilities.



III. Review/Update to Original Plan

The previous "Analysis of Impediments to Fair Housing Choice" was prepared by the City of Milford in 2011. The identified Impediments to Fair Housing Choice are reviewed twice each year in the City's Annual Action Plan and again in the Consolidated Annual Performance Evaluation Reports (CAPER). The following restates the previously identified impediments from 2011 and summarizes the progress made on each.

Impediment 1: Affordable Housing

A significant barrier to fair housing choice in Milford is the lack of affordable housing units resulting from high development costs. In updating its Plan of Conservation and Development in 2002, the City determined that little vacant developable land is left in Milford. The majority of the vacant land remaining in the City is constrained by topography, wetlands and floodplains. Because of this, the development of new affordable housing units will most likely result from the rehabilitation and adaptive reuse of existing buildings or in-fill development.

In 2004, the City adopted revised zoning regulations and designated several areas where multi-family housing construction is permitted only if at least 30% of the units are affordable. Recently, the Planning and Zoning Board has approved three affordable housing developments under these regulations.

Affordable housing development in Milford is also hampered by the current housing market correction, the tight supply of credit-based financing available for residential development and reductions in public sector housing development funding sources.

Accomplishments:

- The City of Milford CDBG Housing Repair Programs support investment in existing housing stock and offer residents, renters and buyers an improved living environment or to the next owner moving into the Milford community. The CDBG Housing Programs are marketed in the Milford Community in a variety of ways including the City Website, a Press Release from the Mayor's office, direct mailing of brochures and flyers and information boards or emails from agency and community partners. The staff received a high number of inquiries on the Homeownership Program and two (2) households received assistance to purchase a home in Milford. During the 2018-19 program year the staff responded to many inquiries and applications for the Single Family Residential Housing Repair



Program for repairs or maintenance but many owners were not eligible or did not want a second mortgage lien on their, or their parent's homes.

Impediment 2: Accessible Housing

It is difficult to obtain data on the total number of accessible units, both private and public, in Milford. However, the Milford Redevelopment and Housing Partnership (MRHP) has developed a program to address Section 504 compliance in public housing units. CDBG funds have been used to make improvements as part of this program. Currently, 33 of the 465 public housing units are accessible.

Accomplishments:

- Based on CDBG funding, the City has funded the MRHP, as well as programs that modify curb cuts, sidewalk grading, repair and extended sidewalks to create safer pedestrian travel throughout the community. Additionally, CDBG recipients such as the Beth-El Center and the Health Department, along with MRHP, keep an open line of communication to resolve issues with disabled and elderly persons with medical necessities. Another organization in the community, the Collaborative for Residential Integrity of the Disabled & Elderly (CRIDE) addresses the behavior of hoarding and the sub-standard housing conditions and daily hardship it creates for families.

Impediment 3: Transportation Access

The City is served by four fixed route bus lines operated by Milford Transit. These lines connect to the MetroNorth rail service with a stop at the train station, and to regional bus routes operated by the Greater Bridgeport Transit District. The availability of public transit enables housing choice by offering means for travel within Milford and the Region without the need for a car.

There are various segments of the population who do not have access to the fixed route bus system due to location, age, or disability. The Milford Transit District also supports an elderly and handicapped van ride program. Rides are restricted by purpose and must be scheduled in advance. The Milford Senior Center also provides in-town transportation services at no charge to their members.



Accomplishments:

- The City allocates grants and some technical assistance to senior and transportation agencies who serve and maintain specific community services, such as transportation drivers that assist the elderly.

Impediment 4: Regulatory and Policy Practices

The City's land use regulations do not provide an impediment to fair housing. Recent amendments to the City's Zoning Regulations, described above, have actually encouraged the development of affordable housing. In addition, the City's cluster development regulations encourage more dense development with lower development costs to help make housing more affordable.

Accomplishments:

- The Director of Land Use and Permitting is in the process of preparing a new Plan of Conservation and Development which has not been updated since 2002. It is recommended that new zoning regulations and inclusionary zoning be included. Developable land is constrained by topography, wetlands and floodplains as natural impediments to housing construction but zoning can be revised so that Milford can again incorporate and encourage housing with 2 or more units to be constructed and include affordability with CDBG funding, Section 103 program, additional public and private funding, City support, a Housing Partnership Committee with members from the zoning, housing, service, and mortgage professionals to oversee the acquisition or rehabilitation of existing private and/or housing units managed by the public housing authority. The City of Milford and the Director of Economic & Community Development have been tasked with preparing an Affordable Housing Plan. In 2018 funds were provided to the Corporation for Independent Living and a Mobility specialist to complete residential accessibility housing projects in Milford.

Impediment 5: Education and Enforcement

The City's Fair Housing Officer, based in the Department of Community Development, is an active member of the Connecticut Fair Housing Association. The Fair Housing Officer handled 18 inquiries in the 2008-2009 program year and 16 inquiries in the 2007-2008 program year. The majority of inquiries involve eviction, foreclosure and reasonable accommodations for the disabled issues. In most cases, the Fair Housing Officer provides information over the phone or by mail.



The Fair Housing Officer also participates in the City's Social Services Network, and can obtain referrals from other social service agencies operating within the City through this forum. Finally, other agencies such as Statewide Legal Services and the Connecticut Housing Education Resource Center are available to assist in providing educational training and workshops for Milford residents, landlords and real estate professionals.

Accomplishments:

- The City of Milford takes impediments to fair housing choice seriously and counters by providing pertinent information and any necessary follow up. The CDBG Administrator anticipates allocating public service funds to contract a professional fair housing counselor during the 2020 NOFA cycle to assist the CDBG Administrator to hold fair housing workshops on specific topics such as the 8-30g-8 Maximum set-aside housing payment calculator to assist tenants and property managers/owners accurately determine the rent or resale price for a person at 80% and 60% median income with current FMR and State and HUD annual median income and FMR level. The Administered will continue to field inquiries and the 8-30g Plans and annual unit certification information. Advocating for fair housing choice through education and public information benefits everyone in a community.

Impediment 6: Mortgage Approvals

The availability of mortgage financing for housing is crucial to fair housing choice because, as stated before, affordability is a significant barrier. Recent Home Mortgage Disclosure Act (HMDA) data reveals that lending to consumers has contracted in the recent financial crisis. However, Milford borrowers generally have slightly more access to mortgage financing than in the Metropolitan Statistical Area (MSA), as is evident in the table comparing denials below. Denial rates for all types of loans are higher in the MSA than in Milford. The relatively high refinancing and home improvement denial ratio in the City and MSA could signal future problems with foreclosures as some residents may be struggling in the current economic climate to keep up with mortgage payments and/or maintenance costs.

Accomplishments:

- Since the 2012 financial crisis, mortgage companies and banks have returned to strict lending practices to prevent loan defaults and protect borrowers from ruining personal credit but lending and home sales are much lower in 2018 than before the crisis. The Economic and Community Development Department (ECD) provides a list of



HUD housing counseling agencies and CT Judicial Resources on its webpage to assist buyers and homeowners looking for guidance foreclosure mitigation, the mortgage process household budgeting, paying off debt to build credit or correct credit scores, down payment assistance programs. The CDBG Administrator and the ECD office work with Capital for Change, the Housing Development Fund, Bridgeport Neighborhood Trust Mutual Housing Association and Neighborhood Housing Services of New Haven who present low interest housing assistance and referrals on housing repairs to community non-profit organizations such as HomeFront, Habitat for Humanity and Westbridge, Inc.



IV. Impediments to Fair Housing 2020

In order to determine if impediments to fair housing choice exist, interviews and meetings were conducted, and an analysis of the fair housing complaints in Milford was undertaken.

A. Fair Housing Complaints:

1. Fair Housing Efforts in the City of Milford

The City of Milford has a Fair Housing Officer that receives and reviews inquiries of unfair rental and housing practices. The Fair Housing Officer will often contact the property managers in



question over the disagreements. If necessary, the Officer will refer the inquiry to the Connecticut Fair Housing Association for further review. Educational materials regarding Fair Housing Laws are available for consumers at the City's Department of Economic and Community Development offices and on the department's section of the City website. The City is in process of contracting with a Fair Housing counseling service that will respond to inquiries and complaints related to fair housing and tenant landlord disputes.

**Milford Department of Economic
and Community Development**
70 West River Street
Milford, CT 06460
203-783-3230

2. Connecticut Fair Housing Center

The Connecticut Fair Housing Center is a nonprofit that provides free investigative and legal services to Connecticut residents that have experienced some form of housing discrimination. The

Center works with state and local governments, housing professionals, and other entities to promote compliance with Federal and state fair housing laws. The Center receives 1,100 phone calls state-wide annually from residents facing barriers to housing; 10% of those cases show discrimination is based on familial status.

Connecticut Fair Housing Center
60 Popieluszko Court
Hartford, CT 06106
860-247-4400
info@ctfairhousing.org



3. Connecticut Commission on Human Rights and Opportunities

It is the mission of the Connecticut Commission on Human Rights and Opportunities (CHRO), *“to eliminate discrimination through civil and human rights law enforcement and to establish equal opportunity and justice within the state through advocacy and education.”*

**Connecticut Commission
on Human Rights and
Opportunities**
450 Columbus Boulevard
Hartford, CT 06103
860-541-3400

The Commission was conceived in 1943 as the Inter-racial Commission, charged with investigating “the possibilities of affording equal opportunity of profitable employment to all persons.” CHRO’s powers expanded in fits and starts, accruing over the years the ability to receive complaints, remedy situations involving discrimination, and eventually addressing the issue of housing discrimination.

The Commission receives its authority from the Connecticut General Statutes, Chapter 814c. It is the statutory responsibility of the CHRO to:

- Enforce human rights laws that ban illegal discrimination in employment, housing, public accommodations, and credit transactions.
- Monitor compliance with state contract compliance laws and with laws requiring affirmative action in state agency personnel practices.
- Establish equal opportunity and justice for all persons in Connecticut through education and outreach activities.

The Connecticut Commission on Human Rights and Opportunities publishes an annual summary of docketed cases filed during the Fiscal Year, as well as Complaints Closed. CHRO receives Employment, Housing, Public Accommodations and “Other” complaints. **Table IV-1** illustrates the trends for complaints that were docketed and conciliated for the State of Connecticut from 2015 to 2019. The reports are published each year in an annual report to the Governor, as well as a stand alone report. In FY 2019, employment related complaints accounted for 77.3% of the total complaints. Employment related complaints accounted for over 80% of the total amount of complaints filed. Except for 2019, complaints for Housing and Public Accommodations have remained relatively consistent between 2015 to 2018. On average 8.2% of complaints account for Housing and an average of 8.9% complaints account for Public Accommodation.



Table IV-1 – CHRO New Complaints Docketed

Category	2015	2016	2017	2018	2019	Total
Employment	2,160	1,963	2,091	2,088	2,028	10,330
Housing	220	217	192	190	214	1,033
Public Accommodations	217	181	177	177	367	1,119
Other	19	15	24	24	16	98
TOTALS	2,616	2,376	2,484	2,479	2,625	12,580

Source: State of Connecticut Commission on Human Rights and Opportunities

Table IV-2 – CHRO Complaints Closed

Closure Type	2015	2016	2017	2018	2019	Total
Administrative Dismissal	168	195	98	95	108	664
Case Assessment Review - No Claim Relief	49	106	178	178	4	515
Case Assessment Review - No Possibility of Reasonable Cause Finding	12	61	179	179	255	686
Case Assessment Review - Respondent Exempt	2	1	3	3	171	180
*Case Assessment Review - Frivolous	-	-	2	2	4	8
No Reasonable Cause	405	366	338	332	349	1,790
**No Reasonable Cause - Administrative Dismissal	-	47	31	31	12	121
No Reasonable Cause - Lack of Jurisdiction	9	7	6	6	8	36
Pending	18	2	2	2		24
Pre-determination Conciliation	92	67	55	56	45	315
Public Hearing/Court Closure	60	51	51	51	34	247
Release of Jurisdiction	600	540	543	542	612	2,837
Satisfactorily Adjusted	10	21	22	22	12	87



Unknown	10	5	11	11	3	40
Withdrawal	160	139	115	115	117	646
Withdrawal with Settlement	1,131	983	800	799	906	4,619
TOTALS	2,726	2,591	2,434	2,424	2,640	12,815

Source: State of Connecticut Commission on Human Rights and Opportunities

*Note: CHRO did not have the category “Case Assessment Review – Frivolous for 2015 and 2016; in 2015, there were additional fields listed in the following **Table IV-2-A**.

**Note: CHRO did not have the category “No Administrative Cause – Administrative Dismissal” for 2015.

Table IV-2-A – CHRO Complaints Closed - 2015

Merit Assessment Review – No Claim for Relief	57
Merit Assessment Review – No Possibility of Reasonable Cause Finding	7
Merit Assessment Review – Respondent Exempt	3
TOTAL	67

4. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of Housing and Urban Development’s (HUD) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act.

Boston Regional Office of FHEO
Thomas P. O’Neill, Jr. Federal Building
10 Causeway Street, Room 321
Boston, MA 02222-1092
617-994-8300

The complaints received for New Haven County are shown in the following **Table IV-3** to illustrate the most common basis for complaints over the five-year span from January 1, 2016 through June 26, 2019.



New Haven County:

Table IV-3 – Basis for Complaint by Percent in New Haven County

Basis	Number	Percentage
Race	1	7.1%
Disability	9	64.3%
National Origin	0	0.0%
Family Status	2	14.3%
Sex	2	14.3%
Retaliation	0	0.0%

Source: U.S. Dept. of HUD-FHEO, Boston Regional Office

The following **Table IV-4** “HUD-FHEO Complaints” summarize all of the complaints filed with the Office of Fair Housing & Equal Opportunity between January, 2015 and March, 2020 in New Haven County.



Table IV-4 – HUD-FHEO Five Year Complaints for New Haven County, CT

HUD Filing Date	Basis	County	Closure Reason	Issues
04/27/16	Disability	New Haven	Conciliation/settlement successful	Failure to make reasonable accommodation
09/19/16	Sex, Familial Status	New Haven	Conciliation/settlement successful	Discriminatory refusal to negotiate for sale, Discrimination in the purchasing of loans, Discrimination in the terms/conditions for making loans, Discrimination in terms/conditions/privileges relating to sale
10/24/16	Disability	New Haven	Unable to locate complainant	Failure to make reasonable accommodation
03/07/17	Disability	New Haven	Pending	Discriminatory terms, conditions, privileges, or services and facilities, Otherwise deny or make housing unavailable, Discriminatory acts under Section 818 (coercion, Etc.)
01/03/18	Disability	New Haven	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental, Other discriminatory acts
02/16/18	Disability	New Haven	No cause determination	Discrimination in terms/conditions/privileges relating to rental, Failure to make reasonable accommodation
05/30/19	Disability	New Haven	No cause determination	Failure to make reasonable accommodation
07/29/19	Race	New Haven	No cause determination	Discrimination in the making of loans, Discrimination in the terms/conditions for making loans
11/13/19	Familial Status	New Haven	Pending	Discriminatory refusal to rent and negotiate for rental, Discriminatory advertising, statements and notices, Discrimination in terms/conditions/privileges relating to rental
01/13/20	Disability	New Haven	No cause determination	Discriminatory refusal to rent, False denial or representation of availability - rental, Discrimination in terms/conditions/privileges relating to rental



02/28/20	Disability	New Haven	Complaint withdrawn by complainant after resolution	Failure to permit reasonable modification
03/19/20	Sex, Disability	New Haven	Pending	Discriminatory terms, conditions, privileges, or services and facilities, Discriminatory acts under Section 818 (coercion, Etc.), Failure to make reasonable accommodation

Source: U.S. Dept. of HUD-FHEO, Boston Regional Office

5. Human Services, Housing, and Community and Economic Development Agencies

The City of Milford interviewed agencies offering housing, human services, and community and economic development services within the City, in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies were engaged in roundtable discussions or individual meetings:

- Milford Redevelopment & Housing Partnership
- Beth-El Center
- Connecticut Coalition to End Homelessness
- City Milford Economic and Community Development
- TEAM, Inc.
- Literacy Volunteers of Southern Connecticut
- BHCare
- Boys and Girls Club of Milford
- Bridges
- Pantochino Productions, Inc.
- Milford Arts Council
- Lifeway Mobility



Each of these agencies provided feedback on housing, homelessness, and community-related issues in the City of Milford. Complete meeting notes can be found in Part VI, Appendix D. The following is a summary of some of the comments that were received during the roundtable discussions:

- Affordable housing is an issue in the City.
- Need for more senior housing in the City.
- Seniors are struggling with taxes and housing upkeep.
- Food insecurity is an issue for some.
- There is a need for more education on Fair Housing issues.
- There is a need for accessible sidewalks or sidewalk repair in some areas of the City.
- Residents are asking for more public/open spaces.
- There has been an increase in homelessness.
- The City faces some litter and dumping issues.
- Waitlists for public housing are too long.
- There should be more workforce housing.

Milford Redevelopment and Housing Partnership:

The Milford Redevelopment and Housing Partnership (MRHP) is a housing provider, first and foremost. The MRHP receives a limited amount of funds from the State and Federal governments, and chooses instead to focus on its housing program, including a very successful scattered-site program and a comprehensive security system that helps housing authority residents and their neighbors. The MRHP does keep an open line of communication and partnership with social service providers in the area, along with the varying levels of government. The MRHP does not have a VASH program, a family self-sufficiency program, nor a reunification program. Instead, the Redevelopment and Housing Partnership provides an extensive list of services for varying needs including but not limited to: alcoholism services, childcare services, education and training, emergency services, employment services, food programs, housing and homeownership programs, medical services and information, senior services, transportation and youth services.



Current plans/goals of the Redevelopment and Housing Partnership:

The mission of the Milford Redevelopment and Housing Partnership (MRHP) is to assist low-income families with safe, decent, and affordable housing opportunities as they strive to achieve independence and self-reliance and improve the quality of their lives. The Authority is committed to operating in a fiscally prudent, efficient, ethical, and professional manner. The MRHP will strive to provide a suitable living environment for the families it serves without discrimination.

MRHP 5 – Year Plan Goals and Objectives:

1. Goal:

Manage the Milford Redevelopment and Housing Partnership's existing public housing program in an efficient and effective manner thereby qualifying as at least a standard performer.

Objective:

The Milford Redevelopment and Housing Partnership will promote a motivating work environment with a capable and efficient team of employees to operate as a customer-friendly and fiscally prudent leader in the affordable housing industry.

2. Goal: Provide a safe and secure environment in Milford Redevelopment and Housing Partnership's public housing developments.

Objective 1:

The Milford Redevelopment and Housing Partnership shall continue to reduce crime in its developments so that the crime rate is less than the surrounding neighborhood.

Objective 2: Improve willingness of residents to report incidents of crime to the Milford Police Department and to empower residents to actively work with the police to achieve a safe and secure environment.



- 3. Goal:** Expand the range and quality of housing choices available to participants in the Milford Redevelopment and Housing Partnership tenant-based assistance program.

Objective 1:

The Milford Redevelopment and Housing Partnership shall achieve and sustain a utilization rate of 98% in its tenant-based program.

Objective 2:

The Milford Redevelopment and Housing Partnership shall attract 5 new landlords who want to participate in the program by December 31, 2020.

- 4. Goal:** Enhance the image of public housing in our community.

Objective:

The MRHP will continue to address the operational needs of the organization for the purpose of improving neighborhood appearance in keeping with the value of the surrounding communities.

Social Services Agencies:

Issues and needs:

- Affordable housing is an issue in the City.
- Multi-unit complexes are popping up throughout the City, but often at market-rate and unaffordable to low- to moderate-income residents.
- There is a need for an emergency repair program.
- Transportation is an issue; there are limited schedules. A route for Milford Transit was cancelled on Post Road by the drop-in center.
- Need for funding for security deposits.
- There is an increasing homeless population.

Other Comments:

- There is a need for more houses catering to people with disabilities and the elderly.
- Loss of open space for new development.



- There is an issue with mixing seniors with people with disabilities; some seniors must wait for four (4) years for housing.
- There are blighted properties that need to be cleaned up.
- “Granny” or in-law houses are not in areas with small lots 50’ x 100’.

B. Public Sector:

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community’s commitment to housing goals and objectives. Therefore, the local policies determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City’s policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

The “Vision” of the Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for the City of Milford, CT. The following goals and objectives have been identified for the period of FY 2020 through FY 2024:

**Table IV-5 – Five Year Strategies and Objectives
for the City of Milford**

Housing Strategy – HSS (High Priority/Level 1)	
There is a need to improve the quality of the existing housing stock in the City and to increase the supply of decent, safe, and accessible housing for low- and moderate-income persons and families of all ages.	
Objective	
<i>Promote residential housing choice for all ages of low- and moderate-income households. Increase new and improve the existing housing stock. Create decent, safe, sound, accessible and stable housing environments and decrease eviction and/or homelessness rates.</i>	
HSS-1 Preserve Existing Housing Stock Rehabilitation – Provide financial assistance to rehabilitate and modify residential property to benefit low- and moderate-income	



owner and non-owner occupants including modernization of public housing rental units owned by the Milford Redevelopment Housing Partnership (MRHP). Landlord engagement efforts expect assist local service organizations by increasing the number rental homes improved with CDBG funds for the benefit of low/moderate income ALICE households and persons at-risk of homelessness.
HSS-2 Housing Service Program(s) – Support new and existing housing services such as security deposits and subsistence payments including utility fees, mortgage and rent payments to stabilize housing and reduce the possibility of eviction and/or homelessness for low- and moderate-income households.
HSS-3 Affordable Housing – Increase the supply of affordable housing options for low- and moderate-income households, specifically privately owned affordable elderly housing units.
HSS-4 Housing Education – Promote and affirmatively affirm fair housing to combat housing discrimination. Provide information, educational opportunities, and programs, to improve awareness of a person's rights under the Fair Housing Act, Americans with Disabilities Act, and other Federal and State laws.
HSS-5 Homeownership - Assist eligible first-time buyers who wish to own a home by providing down payment assistance, closing cost assistance and HUD Housing Counseling.
Homeless Strategy – HMS (High Priority/Level 1) There is an urgent need for housing and operational support to assist youth and adults experiencing homelessness and persons who are at-risk of becoming homeless.
Objective <i>Adopt a “Housing First” approach to rapid re-house homeless persons, youth, families, and those who may be at-risk of becoming homeless. Engage private residential property owners to assist the service providers to secure rental units, improve existing housing conditions and promote permanent supportive housing options.</i>
HMS-1 Operational Support – Continue support to providers for their operation of shelters to provide housing and offer support services to youth and adults experiencing homelessness and persons who may be at-risk of becoming homeless. Continue support for short-term services: including financial assistance, housing search assistance, and targeted services, which have has shown tremendous promise in resolving the immediate crisis of homelessness for many families and preventing their return to homelessness.
HMS-2 Housing – Provide funds to homeless service providers to rehabilitate and improve shelter facility, emergency services, and additional permanent supportive housing opportunities for homeless persons and families.
HMS-3 Landlord Engagement - Increase the supply of rental resources for housing service providers in support of the Federal and State Rapid Re-Housing Programs.
Other Special Needs Strategy – SNS (Priority/Level 2)



There is a growing need for affordable housing and facilities for seniors, persons with disabilities, victims of domestic violence, persons with alcohol/drug dependency, person with development disabilities and persons with other special needs.

Objective

Improve the living conditions and services for those residents with other special needs, including the disabled population.

SNS-1 Other Special Needs - Support social service programs and facilities for persons with special needs. Create accessible, safe conditions for persons with special needs through rehabilitation of existing buildings and new construction.

SNS-2 Housing - Support the development of affordable, accessible, decent, safe, and sound housing for persons with special needs through rehabilitation of existing buildings and new construction.



Community Development Strategy – CDS (Priority/Level 2)

There is a need to improve public and private property, neighborhood facilities and infrastructure, and to expand public transportation services to improve the quality of life for low- and moderate-income households.

Objective

Improve private property to reduce blighted influences in neighborhoods. Enhance infrastructure and public services for low- and moderate-income persons throughout the City of Milford.

CDS-1 Infrastructure - Promote improvements to private residential and commercial property and public facilities through enforcement of existing zoning and land development ordinances. Through use of receivership, provide a mechanism to allow private entities and nonprofits to invest in much needed repairs to transform abandoned and blighted buildings into productive reuse and to improve the quality of life for residents and neighbors. Rehabilitate, reconstruct, and/or develop new public infrastructure such as sidewalks, curbs, storm drainage, and waste water systems to mitigate the threat of flooding due to rising sea level along coastal areas.

CDS-2 Community Facilities - Promote improvements to community recreation such as walking trails, bike lanes and other eligible public facilities.

CDS-3 Accessibility Improvements - Eliminate architectural barriers and continue to make ADA accessibility improvements to public facilities.

CDS-4 Public Services - Increase and enhance public service programs that benefit persons who struggle with illiteracy, homelessness; steady employment, working families find affordable safe child care, the elderly and disabled who want to remain independent in Milford but who are physical or financially unable to maintain their properties, public transportation to disabled riders and homebound seniors, provide supplemental food resources to families struggling with food insecurity, and other public service programs.

CDS-5 Public Safety - Improve pedestrian and public safety features including the City's ability to respond to emergency situations.

CDS-6 Open Space - Preserve and improve open spaces throughout the City with new landscaping and passive recreational uses in eligible areas.

Economic Development Strategy – EDS (Priority/Level 3)

There is a need for new employment opportunities, job skill training, small business development assistance and improvements to commercial property.

Objective

Improve and expand employment opportunities for low- and moderate-income employees and assist small businesses in the City.

EDS-1 Economic Development - Encourage commercial property improvement, development and expansion of commercial corridors and transit-oriented routes through special economic financial assistance.



EDS-2 Employment - Support and encourage job creation, job retention, and workforce development by employers to assist the unemployed and underemployed, including summer youth programs.
EDS-3 Financial Assistance - Support the micro-enterprise business program to assist the new start-up firms, MBE, and WBE enterprises.
Administration, Planning & Management Strategy – AMS (High Priority) Continue to support sound program administration practices for Federal, State, and local funded programs.
Objective <i>To manage and expend Federal, State, and local funds in a timely manner.</i>
AMS-1 Overall Coordination - Provide funds to continue successful administration in compliance with Federal, State, and local funded programs including City project support and professional services to prepare HUD Plans and Reports.
AMS-2 Special Studies/Management - Provide and promote funds in support of the development of special plans and management activities.
AM-3 Oversight - Provide and promote funds in support of training, education, outreach, and monitoring to affirmatively further fair housing and the distribution of public information in the City of Milford and increased zoning enforcement oversight of private and public residential and commercial property.

The City of Milford receives CDBG funds from HUD as an entitlement city under the program. In FY 2020 the City anticipates receiving \$515,464 in CDBG funding this fiscal year. The City will allocate its funds to projects residential rehabilitation, micro-enterprise business assistance, public services, and homebuyer assistance. All of the CDBG funds are directed toward directly benefitting low- and moderate-income persons.

The City in its FY 2020 CDBG Program allocated the funds as follows:



Table IV-6 – FY 2020 CDBG Budget for the City of Milford

Community Development Block Grant Funds		
Number	Activity	Amount
<i>Program Administration:</i>		
	Program Administration	\$ 103,093
<i>Homeless:</i>		
	Homeless Shelter, “No Freeze” Emergency	\$ 17,000
	Homeless Shelter, Soup Kitchen	\$ 14,000
<i>Housing:</i>		
	Security Deposit	\$ 8,000
	Tenant Landlord Counseling	\$ 2,000
	Single Family Housing Repair Program	\$ 59,000
	Multi-Family Residential Housing Repair Program	\$ 75,000
	Housing Program, Administration	\$ 35,000
	First Time Homebuyer Program	\$ 15,000
<i>Community Development</i>		
	After School Program	\$ 10,500
	Literacy Volunteers of Milford	\$ 3,000
	Transportation, Elderly Services	\$ 7,500
	Subsistence Payments	\$ 15,000
	Rape Crisis Services	\$ 3,319
	Public Facility, Sidewalk Improvements	\$ 60,000
	Public Facility Improvement, Open Space Recreation	\$ 56,052



<i>Economic Development</i>	
Micro-Enterprise Business Assistance	\$ 30,000
<i>Other Special Needs</i>	
Public Facility Improvement, Bus Shelter	\$ 5,000

2. Other Funds

In addition to its CDBG funds, the following other public resources have been received by agencies in the City of Milford for a variety of projects and programs that benefit the City:

- Federal PILOT Grant
- Education Cost Sharing
- State Realty
- State Realty - Pequot
- Telephone Access Line Grant
- Misc. State-Mun. Stabilization
- School Health Fund
- Program Income

3. Low Income Housing Tax Credits

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households.

There are currently no known projects, proposed projects, or planned projects in the City of Milford that will be using LIHTC funds. The City is supportive of the use of LIHTC projects to provide affordable housing to low-income households, and had previously developed a LIHTC project in 1999 totaling 120 housing units, of which 120 were low-income occupied units.

The following table shows the one LIHTC project that was built in Milford from 1987 through 2018 based on data available:



Table IV-7 – LIHTC in Milford, CT

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
CTA19990040	SARANOR APTS	119 Platt St	Milford	CT	06460	120	120

Source: lihtc.huduser.gov

4. Zoning Regulations of the City of Milford, Connecticut

The *Zoning Regulations of the City of Milford* was first adopted on June 11, 1930 and re-adopted on March 22, 2019 by the City Planning and Zoning Board.

The Zoning Regulations of the City of Milford divides the City into fifteen (15) classes of zoning districts, as well as an additional nine (9) Corridor Design Development Districts. Each zoning district contains permitted and conditional land uses, along with associated development standards. These development standards establish minimum lot sizes, maximum lot coverage, parking requirements, minimum yard setbacks and related requirements. The identified classes are:

- One Family Residential
- Single Family Attached – Permitted Uses include:
 - 3.2.1.1** Any building or use permitted and regulated in One Family Residential Districts, Section 3.1 herein, with the exception of 3.1.6 Planned Elderly Community.
 - 3.2.1.2** Single Family Attached Dwellings
 - 3.2.1.3** This regulation shall apply to subdivisions approved on or after January 1, 1975.
- Multi-Family Residential
- Residential Office – Permitted Uses include:
 - 3.4.1.1** Any building or use permitted in One-Family Residential Districts, Section 3.1 herein, with the exception of 3.1.6 Planned Elderly Community.
 - 3.4.1.2** Subject to Site Plan review in accordance with Section 3.4.1.3 and Section 7.1 herein, offices for business, financial,



professional or personal services or other similar offices, but excluding funeral homes and music and dance studios.

3.4.1.3 Mixed use buildings containing allowable offices and dwelling units

3.4.1.4 Use Conditions: All office and mixed use buildings shall be subject to the following additional conditions and safeguards.

(1) Site Plan Requirement

(2) Exterior Lighting

(3) Street Access

- Design Office – Special Uses include:

3.6.2.1 Scientific or research laboratories devoted to research, design, and/or experimentation.

3.6.2.2 Farms, as defined herein.

3.6.2.3 Truck Gardens, Nurseries or Garden Centers, subject to Site Plan Review in accordance with ARTICLE VII, herein, and subject to the following:

(1) Provided that only produce raised or grown on the premises is sold there from;

(2) The sale by a nursery or garden center of plants, flowers and shrubs started elsewhere, but sold from an enclosed greenhouse, shall be allowed;

(3) The lot size shall be not less than three (3) acres:

(4) The buffer strip of not less than thirty (30) feet in width shall be provided adjacent to a residential district.

3.6.2.4 Hotels or motels containing a minimum of one hundred (100) rooming units subject to the following conditions:

(1) The hotel or motel shall be part of a mixed use development within the parcel and shall not be permitted prior to the construction of at least 100,000 square feet of office development on the parcel.

(2) Rooming Units

(3) Common Floor Area

(4) Site Plan Requirements

(5) Utilities



(6) Minimum Lot Requirements

(7) Minimum Yard and Open Space Requirements

3.6.2.5 Extended stay hotels.

3.6.2.6 Use Conditions: All of the above Special Uses shall be subject to the following additional conditions and safeguards:

(1) Site Plan Requirements

(2) Exterior Lighting

(3) Street Access

(4) Utilities: No use shall be approved by the Board unless the building is:

(a) Served by an adequate public sanitary sewerage system, community subsurface sewage disposal system, or private, individual sewage disposal facilities approved by the Director of Public Health; and

(b) Supplied with water from an adequate public water supply, community water supply or private, individual wells approved by the Director of Public Health.

(c) All utilities serving the site are to be underground

- **Boating Business** – Special Uses include:

3.7.2.1 Boat clubs, marinas or yards subject to the following conditions and safeguards.

(1) Health and Sanitation

(2) Filling and Dredging

(3) Flood Hazards

(4) Site Plan Requirements

(5) Exterior Lighting

(6) Utilities

- **Business – BD** – Special Uses include:

3.8.1.1 Any building or use permitted in One-Family Residential districts, provided the lot area per dwelling or use is 20,000 square feet or greater, Section 3.1 herein.



- 3.8.1.2** Stores for sale of goods or establishments for performance of allowable personal services.
- 3.8.1.3** Offices for business, financial, professional or personal services or other similar offices.
- 3.8.1.4** Self-service laundry not using steam, provided that the floor area shall not exceed 3,000 square feet per establishment.
- 3.8.1.5** Dry cleaning establishment, provided that the floor area shall not exceed 3,000 square feet per establishment and subject to approval of the cleaning solvents by the Fire Department and approval of the method of waste disposal by the Departments of Public Works and Public Health.
- 3.8.1.6** Mixed use buildings containing permitted business and/or offices.
- 3.8.1.7** Sale of alcoholic liquor in package, drug or grocery stores subject to the applicable provisions of Section 5.5, herein.
- 3.8.1.8** Eating Places, without facilities for banquets, group meetings, conventions or entertainment, subject to the provisions of Section 5.5, where applicable.
- 3.8.1.9** Martial arts studios or instructional facilities for weaponless self-defense techniques.
- **Business - BD-1** – Permitted Uses include:
 - 3.8.1.1-1** One or two family dwellings.
 - 3.8.1.2-1** Stores for sale of goods or establishments for performance of allowable personal services.
 - 3.8.1.3-1** Offices for business, financial, professional or personal services or other similar offices.
 - 3.8.1.4-1** Self-service Laundromat.
 - 3.8.1.5-1** Dry cleaning establishment subject to approval of the cleaning solvents by the Fire Department and approval of the method of waste disposal by the Departments of Public Works and Public Health.
 - 3.8.1.6-1** Mixed use buildings containing permitted business and dwellings.
 - 3.8.1.7-1** Sale of alcoholic liquor in package, drug or grocery stores subject to the applicable provisions of Section 5.5, herein.



3.8.1.8-1 Eating Places, without facilities for banquets, group meetings, conventions or entertainment, subject to the provisions of Section 5.5, where applicable.

- **Shopping Center Design** – Special Uses include:

3.9.2.1 Mixed uses containing allowable businesses, offices, and multi-family dwelling units; subject to the limitations of Section 3.3 medium density multi-family residential districts (RMF-16): subject to the limitations of Section 3.9.4.3 herein, and provided that the minimum lot area utilized for multi-family dwelling units shall not be less than 20 acres.

3.9.2.2 Multi-Family Dwelling Units as provided and regulated in Section 3.3 medium density multi-family residential districts, subject to the limitations of Section 3.9.4.3, herein, and provided that the minimum lot area shall not be less than 20 acres.

3.9.2.3 Offices for business, financial, professional or personal services or other similar offices.

3.9.2.4 Hotels or motels as provided and regulated in the Design Office District, Section 3.6.2.3.

3.9.2.5 A retail store containing at least 40,000 square feet of floor area.

3.9.2.6 A shopping center containing at least 60,000 square feet of floor area and containing stores for sale of goods at retail or for performance of personal services clearly subordinate and customarily incidental to retail sales.

3.9.2.7 Eating places subject to the provisions of Section 5.5 where applicable.

3.9.2.8 Restaurants with an outdoor customer dining area as defined in Section 11-2.

3.9.2.9 Sale of alcoholic liquor, subject to the applicable provisions of Section 5.5 herein.

3.9.2.10 Stores for sale of goods at wholesale.

3.9.2.11 Indoor places of entertainment, amusement, recreation or assembly such as theaters, billiard rooms, bowling alleys or other similar indoor uses. A public hearing shall be required for all uses designated in this subsection.

3.9.2.12 Dry cleaning or dyeing establishments using non-inflammable solvents; provided that the floor area shall not exceed 3,000 square feet per establishment, and subject to approval of the cleaning solvents by the Fire Department and



approval of the method of waste disposal by the Departments of Public Works and Public Health.

3.9.2.13 Off-street parking garages or lots.

3.9.2.14 Accessory buildings or uses clearly subordinate and customarily incidental to and located on the same lot with any of the foregoing special uses shall be approved by the Board in the same manner as a Special Use.

3.9.2.15 A change in the use of interior space of an existing building in a Shopping Center Design District shall not require either an amendment to a Special Permit and/or Site Plan Approval, provided that such use is listed in Section 3.9.2 or Section 3.9.3, and further provided that no exterior structural changes to the existing building shall be made in connection with such changed use.

3.9.2.16 Extended stay hotels.

3.9.2.17 Health centers or clubs provided that the maximum gross building area devoted to such health center or club use shall not exceed 41,000 square feet.

3.9.2.18 Other related or equivalent principal buildings or uses, which are not specifically listed and are not prohibited may be permitted by the Board by Special Exception in accordance with Section 7.3.

- **Limited Industrial** – Permitted Uses include:

3.10.1.1 The manufacturing, fabricating, assembling or processing of goods or products; provided that the principal use is within a completely enclosed building.

3.10.1.2 Warehousing and/or wholesaling business, provided the principal use is within a completely enclosed building.

3.10.1.3 Building equipment, merchandise, material or supply businesses; provided that the principal use is within a completely enclosed building.

3.10.1.4 Offices for business, financial, professional or personal services or other similar offices.

3.10.1.5 Computer centers.

3.10.1.6 Scientific or research laboratories devoted to research, design and/or experimentation.

3.10.1.7 Printing or publishing establishments.

3.10.1.8 Public buildings, uses, or facilities.

3.10.1.9 Off-street parking garages or lots.



3.10.1.10 Mixed use buildings containing Permitted Uses.

- **Industrial** – Permitted Uses include:

3.11.1.1 The manufacturing, fabricating, assembling or processing of goods, or repair services, but not including any of those uses set forth in the Limited Industrial District, Section 3.10.5.7, herein.

3.11.1.2 Building equipment, merchandise, material or supply businesses.

3.11.1.3 Offices for business, financial, professional or personal services or other similar offices.

3.11.1.4 Computer centers.

3.11.1.5 Scientific or research laboratories devoted to research, design and/or experimentation, including pilot plants.

3.11.1.6 Printing or publishing establishments.

3.11.1.7 Metal, woodworking or other similar shops or repair services. **3.11.1.8** Vocational training schools.

3.11.1.9 Principal warehousing and/or wholesaling business uses. **3.11.1.10** Public utility buildings or facilities.

3.11.1.11 Off-street parking garages or lots.

3.11.1.12 Eating Places: Those eating places containing a minimum floor area of 2,000 square feet subject to the provisions of Section 5.5 herein, notwithstanding 5.5.1.2 and 5.5.4.1.

3.11.1.13 Mixed use buildings containing Permitted Uses.

- **Housatonic Design District – Special Uses include:**

3.12.2.1 Any building or uses as provided and regulated in Industrial Districts, Section 3.11.2, herein; but not including principal trucking terminal facilities in Section 3.11.2.5, thereof.

3.12.2.2 Boat clubs, marinas or boat yards per Section 3.7 herein.

3.12.2.3 Hotels or motels as provided and regulated in CDD District -1, Section 3.16, herein.

3.12.2.4 Extended stay hotels.

3.12.2.5 Other related or equivalent principal buildings or uses, which are not specifically listed and are not prohibited may be permitted by the Board by Special Exception in accordance with Section 7.3.



- Waterfront Design District - There exists in the City of Milford, community assets of such character that it is not in the public interest to establish specific development characteristic for each parcel of land. The Plan of Conservation and Development recognizes the asset of shorefront property and its great value to the community. Therefore, in harmony with the principles of the Plan of Conservation and Development, a special district known as "Waterfront Design District" is hereby established in areas which are found to comply with the conditions and safeguards as set forth hereinafter.
- Open Space - Land that is dedicated to remain largely in an undeveloped state for purposes of providing passive or active recreation, wildlife or nature preserves, farmland, forests, and other open space purposes, shall be classified as Open Space.
- Beach Erosion Zone - shall include all land area created by fill operations or other engineering works after January 1, 1955, as part of any beach improvement, beach maintenance, erosion control, or flood control program instituted by a public agency and located to the water side of the mean high watermark of Long Island Sound as it existed or exists on the date such project is begun, and as shall be more specifically determined by the Director of Public Works. Such map of the existing mean high watermark will be part of these Regulations.

In addition to these fifteen classes of zoning districts the City also has identified nine (9) Corridor Design Development Districts:

- Community Design
- Devon Center - Naugatuck Avenue
- Bridgeport Avenue
- New Haven Avenue
- Regional Business Design
- Milford Center Design Development District
- Interchange Commercial District
- Cascade Boulevard Design Development
- Open Space Affordable Housing Development - Multi-Family

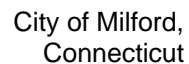
The Zoning Regulations of the City of Milford was approved by City Council and became effective as of June 11, 1930, with amendments dated April 26, 2019, July 26, 2019, and August 30, 2019. The City's ordinance was reviewed for conformance with the Fair Housing Act of 1968, as amended, the American's with Disabilities Act, as amended and HUD Regulations and Guidelines.



Some minor addition and clarifications should be considered:

- Include the Federal definition for “Handicapped” or “Disabled” according to the Americans with Disabilities Act: *DISABILITY*
The term “disability” means, with respect to an individual—
 - a. a physical or mental impairment that substantially limits one or more major life activities of such individual;*
 - b. a record of such an impairment; or*
 - c. being regarded as having such an impairment*
- Include a definition for “Homeless or Homeless shelter”
- Include a definition for “Transitional Housing”

The following is a copy of the City of Milford’s Zoning District Map:



U.S. Department of Housing and Urban Development (HUD)



HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal Laws governing accessibility for persons with disabilities.

Federal Laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable modifications to units and/or common areas in order to allow a disabled tenant to have full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full access. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

5. Taxes

Real estate property taxes may not be an impediment to fair housing choice, but it does impact the affordability of owner and renter housing. The City’s millage rate for 2019 was 27.68. According to the FY 2013-2017 ACS, there were 11,602 households with a



mortgage, where 10,543 (90.9%) paid \$3,000 or more in real estate taxes. Households without a mortgage numbered 4,923 in 2017, with 4,388 households (89.1%) paying \$3,000 or more in real estate taxes. The median real estate taxes paid by households with and without a mortgage was 5,828 for 2017. The estimated median value of a taxable residential property within the City of Milford was \$303,200 in 2017, according to the 2013-2017 American Community Survey.

Table IV-8 illustrates the taxes assessed for property valued at \$100,000 and the City's median value of \$303,200. Real Estate taxes have been identified as a significant cause of housing cost overburden.

Table IV-8 – Real Estate Property Taxes

Taxes for Owner-Occupied Property Assessed at \$100,000 In City of Milford	
Milford City Real Property	\$2,768
Sewer Use Fee	\$316.56
Total Owner Occupied	\$ 3,084.56

Taxes for Owner Median Property Value (\$303,200) In City of Milford	
Milford City Real Property	\$8,392.58
Sewer Use Fee	\$316.56
Total Non-Owner Occupied	\$ 8,709.14

6. Public Housing

Milford Redevelopment and Housing Partnership (MRHP) is an autonomous, non-profit, and private housing agency created to address the need for low-income housing. According to the mission



statement, “The mission of the Milford Redevelopment and Housing Partnership is to assist low-income families with safe, decent, and affordable housing opportunities as they strive to achieve independence and self-reliance and improve the quality of their lives. The Authority is committed to operating in a fiscally prudent, efficient, ethical, and professional manner. The MRHP will strive to provide a suitable living environment for the families it serves without discrimination.”

The Redevelopment & Housing Partnership owns and manages 330 Federal units and 135 State units of public housing. In addition, the Housing Authority administers 267 Housing Choice Vouchers. The MRHP has a total of 137 Efficiency rooms, 259 one-bedroom units, 37 two-bedroom units, 31 three-bedroom units, and 1 five-bedroom unit. There are currently 209 people on the Section 8 waiting list. In addition, there are 16 families on the waiting list for public housing. There are 75 applicants on the Public Housing waiting list that identified as elderly, 12 that identified as near elderly and 98 that identified as having a disability. These waiting lists are closed.

The following are identified in the Milford Redevelopment and Housing Partnership’s FY 2020 Annual PHA Plan as the goals to address the needs of families, seniors, and persons with disabilities in Public Housing and Section 8 Voucher Holders: these goals are designed to identify gaps in services tenant’s face and close these gaps by providing and coordinating the delivery of quality services and resources to residents.

1. Acquire or build units or developments
2. Improve public housing management (PHAS Scores)
3. Renovate or modernize public housing units
4. Conduct outreach efforts to potential voucher landlords
5. Increase voucher payment standards
6. Implement measures to deconcentrate poverty by bringing higher income public housing households in lower income developments
7. Implement public housing security improvements
8. Provide or attract community based supportive services to increase independence for the elderly or families with disabilities



9. Undertake affirmative action measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.
10. Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.

The Milford Redevelopment and Housing Partnership is not rated as a “troubled” agency by HUD.

7. **Comprehensive Plan – Plan of Conservation and Development**

The *Milford – 2022 Plan of Conservation and Development* (POCD) is the City of Milford's latest Comprehensive Plan, adopted in 2012, which provides a roadmap for how the City should plan for growth over the next ten years. The City is currently working on submitting a new POCD for 2022. The plan covers several topics including Land Use, Transportation, Housing, Community Facilities, Water Resources, Economic Development, and Environmental Resources. Much of the Plan of Conservation and Development incorporates existing plans that have been vetted through the community.

The City solicited public and stakeholder input through meetings beginning in October of 2010, with subsequent meetings in from June through September of 2012. The POCD outlines strategies to address the relationship between planned growth and the infrastructure needed to accommodate it. Major themes include:

- **Land Use** - The City states that future vacant residential zoned land will be scarce, so the pressure to identify in-fill development will increase. Additionally, the option for traditional single family home development may be limited, so the City must turn to Corridor Zones that allow residential development under specific conditions.
- **Open Space and Recreation** - The Plan recommends pursuing creation and maintenance of both Passive Open Space and Active Recreation areas to balance the City's status as a fully developed 1st ring suburb. The City recognizes its strengths, outlines areas for potential expansion, and provides a framework for more efficient management and maintenance.
- **Coastal Resources and Long Island Sound** - The Plan recognizes the City's need to adhere to the State's municipal coastal program requirements of the Coastal Management



Act sections 22a-101 to 22a-104. The Plan makes reasonable consideration for restoration and protection of the Long Island Sound ecosystem in a way that reduces hypoxia, toxic contaminants, and floatable debris. Additionally, the POCD must consider sea level rise, and develop strategies to address increased flooding, coastal surges, and inundation.

- **Agriculture** - the City began as an agricultural settlement, but today agricultural land is scarce. The farms that survived have become popular neighborhood assets, serving as a reminder of the City's origins, and providing fresh produce for consumption. The POCD emphasizes the City's commitment to the surviving farms and seeks to protect them through financial success. The City also encourages the continued use and development of community gardens.
- **Housing** - The City must abide by The Connecticut General Statute Section 8-23, which states that communities must take into consideration the need for affordable and multi-family housing that is accessible for pedestrians, transit-oriented, and mixed-use.
- **Historic Preservation** - The City has two historic districts – the original Milford Center, and the more recent South of the Green. Through grants and commissions such as the Historic District Commission and the Historic Preservation Commission, the City have updated design standards within the Zoning Regulations standards to ensure compatibility of new construction.
- **Commercial Corridors** - The City has two major business centers – Milford Center and Devon Center. The POCD also recognizes two less prominent business centers – Naugatuck Avenue and Woodmont Center, and outlines the affects of recent transportation developments that have added and detracted from each corridor. The POCD further offers suggestions on enhancing the commercial corridors, such as promoting streetscape improvements and increased pedestrian access and cycling routes.
- **Industrial Districts** – According to the POCD, in guiding future development and land use activity along the City's commercial corridors, the following should be emphasized when evaluating redevelopment – centralization of uses; development of residential multi-family buildings coupled with ample outdoor public recreation facilities; improvement of streetscape appearance; defined "gateways" into Milford Center and Downtown; better traffic flow; installation of sidewalks on both sides of the road; traffic impact studies and



review processes; installation of bike lanes; and require bike park facilities as part of site plan review process.

- **Public Infrastructure and Buildings** - Education facilities take a prominent role in this section, where the POCD suggests adding supportive infrastructure, such as sidewalks. The school district projects decreased student age population, and believes that some facilities may need to closed down or reconfigured.
- **Transportation and Circulation** - The Plan's Transportation and Circulation section acknowledges its need for more bikeable and walkable spaces to complement its extensive road, rail and bus connectivity.
- **Sustainability** - The POCD follows Connecticut Smart Growth Policies and principles, such as revitalizing existing centers supported by public infrastructure, and focusing on Transit-Oriented Development by identifying brownfield sites for redevelopment.

The Plan of Conservation and Development ends with an Action Plan that reflects the major themes and sets actionable goals for each one.

Five-Year Consolidated Plan Strategies

The City has also completed its FY 2020-2024 Five-Year Consolidated Plan. The following are the key needs, objectives, and goals that were identified to address the City's needs for low-to-moderate income persons.

Housing Strategy (High Priority/ Level 1)

Priority Need: There is a need to improve the quality of the existing housing stock in the City and to increase the supply of decent, safe, sound, and accessible housing for low- and moderate-income persons and families of all ages.

Objective: Promote residential housing choice for all ages of low- and moderate-income households. Increase new and improve the existing housing stock. Create decent, safe, sound, accessible and stable housing environments and decrease eviction and/or homelessness rates.



Goals/Strategies:

- **HSS-1 Preserve Existing Housing Stock** – Provide financial assistance to rehabilitate and modify residential properties to benefit low- and moderate-income owner and non-owner occupants.
- **HSS-2 Housing Service Program(s)** – Support new and existing housing services by providing security deposits and other payments including: utility fees, mortgage and rent payments to stabilize housing and reduce the possibility of eviction and/or homelessness for low- and moderate-income households.
- **HSS-3 Affordable Housing** – Increase the supply of affordable housing options for low- and moderate-income households, including privately owned affordable elderly housing units.
- **HSS-4 Housing Education** – Promote and affirmatively affirm fair housing to combat housing discrimination. Provide information, educational opportunities, and programs, to improve awareness of a person's rights under the Fair Housing Act, Americans with Disabilities Act, and other Federal and State laws.
- **HSS-5 Homeownership** - Assist eligible first-time buyers who wish to own a home by providing down payment assistance, closing cost assistance and HUD Housing Counseling.

Homeless Strategy (High Priority/ Level 1)

Priority Need: There is an urgent need for housing and operational support to assist youth and adults experiencing homelessness and persons who are at-risk of becoming homeless.

Objective: Adopt a “Housing First” approach to rapid re-house homeless persons, youth, families, and those who may be at-risk of becoming homeless. Engage private residential property owners to assist the service providers to secure rental units, improve existing housing conditions and promote permanent supportive housing options.

Goals/Strategies:

- **HMS-1 Operational Support** – Continue support to providers for their operation of shelters to provide housing and offer support services to youth and adults experiencing homelessness and persons who may be at-risk of becoming homeless. Continue



support for short-term services: including financial assistance, housing search assistance, and targeted services, which have has shown tremendous promise in resolving the immediate crisis of homelessness for many families and preventing their return to homelessness.

- **HMS-2 Housing** – Provide funds to homeless service providers to rehabilitate and improve shelter facilities and permanent supportive housing opportunities for homeless persons and families.
- **HMS-3 Landlord Engagement** - Increase the supply of rental resources for existing service providers to address the housing needs for Federal and State Rapid Re-Housing Programs.

Other Special Needs Strategy (Priority/ Level 2)

Priority Need: There is a growing need for affordable housing and facilities for seniors, persons with disabilities, victims of domestic violence, persons with alcohol/drug dependency, person with development disabilities and persons with other special needs.

Objective: Improve the living conditions and services for those residents with other special needs, including the disabled population.

Goals/Strategies:

- **SNS-1 Support for Social Services** - Support social service programs and facilities for persons with special needs.
- **SNS-2 Housing** - Support the development of affordable, accessible, decent, safe, and sound housing for persons with special needs through rehabilitation of existing buildings and new construction.

Community Development Strategy (Priority/ Level 2)

Priority Needs: There is a need to improve public and private property, neighborhood facilities and infrastructure, and to expand public transportation services to improve the quality of life for low- and moderate-income households.

Objective: Improve private property to reduce blighted influences in neighborhoods. Enhance infrastructure and public services for low- and moderate-income persons throughout the City of Milford.



Goals/Strategies:

- **CDS-1 Infrastructure** - Promote improvements to private residential and commercial property and public facilities through enforcement of existing zoning and land development ordinances. Through use of receivership, provide a mechanism to allow private entities and nonprofits to invest in much needed repairs to transform abandoned and blighted buildings into productive reuse and to improve the quality of life for residents and neighbors. Rehabilitate, reconstruct, and/or develop new public infrastructure such as sidewalks, curbs, storm drainage, and waste water systems to mitigate the threat of flooding due to rising sea level along coastal areas.
- **CDS-2 Community Facilities** - Promote improvements to community recreation such as walking trails, bike lanes and other eligible public facilities.
- **CDS-3 Accessibility Improvements** - Eliminate architectural barriers and continue to make ADA accessibility improvements to public facilities.
- **CDS-4 Public Services** - Increase and enhance public service programs that stabilize housing including security deposits and utility deposits, improvements to public transportation, and supplemental food resources to homebound households, and other public service programs.
- **CDS-5 Public Safety** - Improve pedestrian and public safety features including the City's ability to respond to emergency situations.
- **CDS-6 Open Space** - Preserve and improve open spaces throughout the City with new landscaping and passive recreational uses in eligible areas.

Economic Development Strategy (Priority/Level 3)

Priority Need: There is a need for new employment opportunities, job skill training, small business development assistance and improvements to commercial property.

Objective: Improve and expand employment opportunities for low- and moderate-income employees and assist small businesses in the City.



Goals/Strategies:

- **EDS-1 Economic Development** - Encourage commercial property improvement, development and expansion of commercial corridors and transit-oriented routes through special economic financial assistance.
- **EDS-2 Employment** - Support and encourage job creation, job retention, and workforce development by employers to assist the unemployed and underemployed, including summer youth programs.
- **EDS-3 Financial Assistance** - Support the micro-enterprise business program to assist the new start-up firms, MBE, and WBE enterprises.

Administration and Planning Strategy

Priority Need: Continue to support sound program administration practices for Federal, State, and local funded programs.

Objective: To manage and expend Federal, State, and local funds in a timely manner.

Goals/Strategies:

- **AMS-1 Overall Coordination** - Provide funds to continue successful administration in compliance with Federal, State, and local funded programs including City project support and professional services to prepare HUD Plans and Reports.
- **AMS-2 Special Studies/Management** - Provide and promote funds in support of the development of special plans and management activities.

8. Transportation

Milford Transit District

The Milford Transit District (MTD) operates all of the public transit in the City of Milford, providing safe, affordable, dependable, and accessible mass transportation that enhances the mobility of its customers. MTD runs four routes that center around the MTA Milford Train Station. MTD also provides transportation for the elderly and persons with disabilities through a door-to-door van service in



compliance with the Americans with Disabilities Act. The van service reaches all of Milford, Bridgeport, and New Haven areas.

The Coastal Link Route connects Fairfield, Bridgeport, and Milford. The MTA Milford Train Station connects to the Metro-North Railroad, allowing residents to reach New Haven, New York, and all points in between. Parking at the Milford Train Station costs \$300 for an annual permit, \$200 for a 6 month permit, and is free on weekends. The waiting list for a parking permit is currently two (2) years.

Fares for the MTD system are as follows:

- One-way base fare: \$1.75
- Elderly (60+)/Disabled: \$0.85
- Children Under 5: Free

MTD also offers all day and monthly passes, as well as a “10 Ride” pass. Reduced prices are available for seniors and people with disabilities. Van Services cost \$3.00 one-way.

Milford - 2022 Plan of Conservation and Development

The City of Milford planning staff, Planning & Zoning Board and consultants wrote and adopted a decennial planning document covering land use and development policies. The Plan states that Milford’s infrastructure is based on the framework of natural resource systems such as the Housatonic River and Long Island Sound and its contributing watercourses. Additionally, the City follows the man-made infrastructure of I-95, Route 1, and Route 162. The Plan’s Transportation and Circulation Section acknowledges its need for more bikeable and walkable spaces to complement its extensive road, rail and bus connections.

Regional Planning

The *South Central Region: Plan of Conservation and Development 2018-2028* has identified Milford as “an urban core providing significant employment and housing opportunity, along with New Haven, Hamden, West Haven, and Meriden. These urban cores also provide significant cultural, entertainment, and recreational amenities.” Within surveys conducted for the *Plan of Conservation*, respondents identified Milford as one of the region’s retail and shopping destinations. Milford was also identified as one of the region’s best outdoor recreation centers, in large part due to the Milford Greenway System. The Greenway System connects Wepawaug, Beaverbrook, and Housatonic, Indian River-Stubby



Plan, and Farley Brook/Crystal River corridors within Milford. The Greenway System doubles as a way to protect the waterways running through the City, according to the *Plan of Conservation*. In order to better access these amenities, the South Central Regional Council of Governments has centered its second goal on transportation:

“Goal 2. Transportation - The Region’s transportation network supports regional land use objectives, enhances the economic competitiveness of the region, and maximizes transportation choice for the region’s residents.”

Strategies include community collaboration, resident engagement, better communication with state entities such as CTDOT. It also identifies funding opportunities, supports increased use of public transportation, supports timely implementation of high speed rail (HSR), explores opportunities for bus rapid transit (BRT), and supports the expansion of private and commercial air services. Milford, according to the *South Central Region: Plan of Conservation and Development*, has undertaken a significant planning process to establish and encourage Transit-Orientated Development (TOD) through appropriate density and mix of uses around transit assets.

These and future transportation improvements will support the *Milford 2022 Plan of Conservation and Development* growth management and land use goals.

9. Education

Education is often an important factor influencing where people choose to live. According to the 2013-2017 American Community Survey, only 5.3% of the population age 25 years and over, has less than a high school education (or equivalent) in the City of Milford; 27.7% have obtained only a high school diploma or equivalent; and 48.9% have an associate college degree or higher.

The school system serving Milford is part of the Milford Public Schools. The District’s Mission statement reads, “*Students who graduate from Milford Public Schools will demonstrate mastery of reading, writing, and numeracy. Students will comprehend, organize and analyze information in order to independently solve problems and articulate solutions. Students will demonstrate the attributes of good citizenship and community/school engagement.*”

According to Connecticut Report Cards, the Connecticut State Department of Education’s (CSDE) profile and performance reports



for districts and individual schools, Milford School District has 14 public schools, including 8 elementary schools, 3 middle schools, 2 high schools, and 1 alternative program known as The Academy. The district student population has been steadily declining, with 5,926 students in 2016-2017, 5,792 in 2017-2018, 5,635 in 2018-2019, and 5,621 students in the 2019-2020 school year.

The following **Table IV-9** provides a breakdown of the student population by race and ethnicity within the school district.

Table IV-9 Public School Enrollment - Milford School District

Race/Ethnicity	School Year					
	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
American Indian or Alaska Native	7	7	8	6	*	7
Asian	590	595	559	548	545	521
Black or African American	305	296	281	280	265	252
Hispanic/Latino of any race	372	386	441	507	579	683
Native Hawaiian or Other Pacific Islander	9	7	9	9	*	7
Two or More Races	21	53	65	83	97	155
White	4,974	4,808	4,563	4,359	4,135	3,996
Total	6,278	6,152	5,926	5,792	5,635	5,621

Source: edsight.ct.gov

The National School Breakfast and Lunch Program for Connecticut is a Federally assisted meal program under the U.S. Department of Agriculture (USDA). Student are eligible for free or reduced-cost meals if their households earn below \$16,588 for a household of 1, \$22,412 for a household of 2, \$28,236 for a household of 3, and \$34,060 for a household of 4. Further guidelines can be found on benefits.gov/benefit/1955. The percentage of students eligible for free or reduced meals within Milford School District has decreased, but then increased again within the past five years as the student population has decreased.



Table IV - 10 Percentage Eligible for Free/Reduced Price Meals

Free/Reduced Lunch Eligibility	Year					
	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
Free	1,068	1,038	937	864	1,035	1,312
Reduced	282	241	231	219	283	339
Non-Subsidized	4,928	4,873	4,758	4,709	4,317	3,970
Percent Eligible	21.5%	20.8%	19.7%	18.7%	23.4%	29.4%
Total	6,278	6,152	5,926	5,792	5,635	5,621

Source: edsight.ct.gov

Table IV - 11 Student Counts by Special Education Status and Year

Special Education Status	Year					
	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
No	5,512	5,391	5,165	4,971	4,783	4,743
Yes	766	761	761	821	852	878
Percent Special Education Status	12.2%	12.4%	12.8%	14.2%	15.1%	15.6%
Total	6,278	6,152	5,926	5,792	5,635	5,621

Over the last 3 school years, the special education enrollment has increased, while the non-special education enrollment has decreased over the past 6 school years.

The Milford Public School District has identified the following goals and priorities in order to deliver quality public education:

Performance Standard #1 - Milford Public Schools students will be able to read, write and speak effectively.

Goal #1: Improve student achievement in the area of literacy.

- **Goal #1a:** All students will be able to read accurately and fluently, and interpret and respond to grade level texts by the end of 3rd grade (PK-3).
- **Goal #1b:** All students will be able to identify valuable information, research across multiple varied texts, synthesize information, and present it in a well-constructed, evidenced-based response by the end of 7th grade (4-7).



Performance Standard #2 - Milford Public Schools students will be able to define and solve problems.

Goal #2: Improve student achievement in the area of numeracy.

- **Goal #2a:** All students will formulate, select and apply mathematical practices in solving complex, grade level problems by the end of 3rd grade (PK-3).
- **Goal #2b:** All students will be able to problem solve, use reasoning, make connections, and represent mathematical ideas by the end of 7th grade (4-7)

Performance Standard #3 - Milford Public Schools students will be able to solve complex problems and construct and engage in viable arguments based on evidence and research.

Goal #3: Improve students' ability to solve problems and take a critical stance based on evidence and research.

- **Goal #3a:** All students will be able to analyze grade level texts and construct viable arguments by the end of 12th grade (8-12).
- **Goal #3b:** All students will be able to solve complex problems effectively through analyzing data, posing questions, and examining different solutions by the end of 12th grade (PK-12).

Table IV-12 below compares student performance within the Milford School District against State averages and targets using the Next Generation Accountability Results. Areas such as math and science, physical fitness, English proficiency, and Arts Access are provided. Milford School District scores higher than the state average in points earned.



**Table IV-12 – Next Generation Accountability Results
Milford School District**

Indicator	Index/Rate	Target	Points Earned	Max Points	% Points Earned	State Average % Points Earned
1a. ELA Performance Index - All Students	72.5	75	48.3	50	96.7	90.2
1b. ELA Performance Index - High Needs Students	64.8	75	43.2	50	86.4	77.5
1c. Math Performance Index - All Students	69	75	46	50	92	84.1
1d. Math Performance Index - High Needs Students	60.2	75	40.1	50	80.2	70.2
1e. Science Performance Index - All Students	67.2	75	44.8	50	89.6	85
1f. Science Performance Index - High Needs Students	59.9	75	39.9	50	79.8	72.2
2a. ELA Academic Growth - All Students	66.60%	100%	66.6	100	66.6	59.9
2b. ELA Academic Growth - High Needs Students	64.90%	100%	64.9	100	64.9	55.1
2c. Math Academic Growth - All Students	65.30%	100%	65.3	100	65.3	62.5
2d. Math Academic Growth - High Needs Students	59.80%	100%	59.8	100	59.8	55.2
2e. Progress Toward English Proficiency - Literacy	80.80%	100%	40.4	50	80.8	60
2f. Progress Toward English Proficiency - Oral	59.20%	100%	29.6	50	59.2	52.1



4a. Chronic Absenteeism - All Students	8.40%	<=5%	43.2	50	86.4	78.3
4b. Chronic Absenteeism - High Needs Students	14.00%	<=5%	32.1	50	64.1	55.7
5. Preparation for CCR - Percent Taking Courses	90.30%	75%	50	50	100	100
6. Preparation for CCR - Percent Passing Exams	51.90%	75%	34.6	50	69.2	56.7
7. On-track to High School Graduation	92.20%	94%	49	50	98.1	93.6
8. 4-year Graduation: All Students (2018 Cohort)	93.10%	94%	99.1	100	99.1	93.9
9. 6-year Graduation: High Needs Students (2016 Cohort)	92.40%	94%	98.3	100	98.3	88.6
10. Postsecondary Entrance (Graduating Class 2018)	74.70%	75%	99.5	100	99.5	94.5
11. Physical Fitness (estimated participation rate = 96.3%)	68.60%	75%	45.8	50	91.5	70.6
12. Arts Access	51.80%	60%	43.2	50	86.4	86.5
Accountability Index	.		1183.7	1450	81.6	74.2

10. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns



which provide economic opportunities to low- and very low-income persons.

The City of Milford regularly submits Section 3 summary reports along with its Consolidated Annual Performance & Evaluation Reports. Within the 2018-2019 CAPER for Program Year 44, the City awarded \$1,500 to Section 3 businesses for non-construction contracts.

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

C. Private Sector:

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act prohibits such practices as the failure to give the same terms, privileges, or information, charging different fees, steering prospective buyers or renters toward a certain area or neighborhood, or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status or national origin.

1. Real Estate Practices

The New Haven Middlesex Association of Realtors is a regionally based professional association, whose members are governed by the National Association of Realtors Code of Ethics, dedicated to fulfilling the member needs by providing public advocacy, technology, education and knowledge to enhance performance. Members of the Association are obligated to conduct themselves and their businesses in accordance with the Association's rules and regulations, constitution and bylaws, as well as the National Association of Realtors. This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively furthering fair housing.



Each year, the Connecticut Association of Realtors recognizes the significance of the anniversary of the 1968 Fair Housing Act and reconfirms their commitment to uphold fair housing laws as well as the commitment to offer equal professional service to all Connecticut residents in their search for real property. The Local, State and



National Association of REALTORS® have dedicated pages on their websites to Fair Housing. The New Haven Middlesex Association of Realtors has brochures, videos, policy studies, infographics, and other educational materials for members, while all Connecticut Association of Realtors members must complete two 3-hour continuing education courses on Connecticut Real Estate Agency Law and Fair Housing.

There are no reported complaints against realtors that have been recently filed with HUD nor the State Commission on Human Rights.

2. Newspaper Advertising

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

The *Milford Mirror* online classifieds were reviewed on June 30, 2020. There were thirteen (13) listings including spare rooms, apartments, and houses. Of the rental listings posted, nearly half stated “no pets” which is problematic for individuals with disabilities or other needs that require a trained and certified service animal. There did not appear to be any discriminatory wording in any of the listings.

Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The HMDA data was obtained and is included in the following pages of this Analysis of Impediments.

The tables on the following pages outline the disposition of conventional loans and FHA, FSA/RHS, and VA Home-Purchase Loans in the City of Milford by Census Tract. Note that for Tables IV-11 through IV-19; income and race data, is collected for the New Haven-Milford Metropolitan Statistical Area.

Loan applications from low-income households (less than 50% of the National median income) have a denial rate of 17.8%, compared to a denial rate of 32.6% of those whose income is more than 120% of



the national median. Upper-income households have higher origination rates than other income groups.



Table IV-11 – Disposition of Conventional Loans by Census Tract (2017)

Census Tract	Loans Originated		Applications Approved, Not Accepted		Applications Denied by Financial Institution		Applications Withdrawn by Applicant		Filed Closed for Incompleteness		Total Applications Received	
	Count	% of Total	Count	% of Total	Count	% of Total	Count	% of Total	Count	% of Total	Count	% of Total
1501	38	79.2%	1	2.1%	1	2.1%	4	8.3%	4	8.3%	48	6.5%
1502	27	73.0%	0	0.0%	6	16.2%	4	10.8%	0	0.0%	37	5.0%
1503	29	87.9%	1	3.0%	1	3.0%	1	3.0%	1	3.0%	33	4.5%
1504	44	81.5%	1	1.9%	7	13.0%	2	3.7%	0	0.0%	54	7.3%
1505	38	70.4%	2	3.7%	7	13.0%	5	9.3%	2	3.7%	54	7.3%
1506	83	78.3%	5	4.7%	5	4.7%	5	4.7%	8	7.5%	106	14.4%
1507	33	70.2%	1	2.1%	4	8.5%	9	19.1%	0	0.0%	47	6.4%
1508	57	80.3%	0	0.0%	5	7.0%	6	8.5%	3	4.2%	71	9.7%
1509	53	77.9%	1	1.5%	1	1.5%	12	17.6%	1	1.5%	68	9.3%



1510	53	79.1%	1	1.5%	5	7.5%	5	7.5%	3	4.5%	67	9.1%
1511	72	76.6%	2	2.1%	6	6.4%	12	12.8%	2	2.1%	94	12.8%
1512	36	64.3%	5	8.9%	8	14.3%	6	10.7%	1	1.8%	56	7.6%
Total	563	76.6%	20	2.7%	56	7.6%	71	9.7%	25	3.4%	735	100%

Source: <http://www.ffiec.gov/hmda>

Table IV-12 – Disposition of FHA, FSA/RHS & VA Loans by Census Tract (2017)

Census Tract	Loans Originated		Applications Approved, Not Accepted		Applications Denied by Financial Institution		Applications Withdrawn by Applicant		Filed Closed for Incompleteness		Total Applications Received	
	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications
1501	6	85.7%	0	0.0%	1	14.3%	0	0.0%	0	0.0%	7	4.0%
1502	8	80.0%	0	0.0%	1	10.0%	1	10.0%	0	0.0%	10	5.6%
1503	15	83.3%	0	0.0%	1	5.6%	2	11.1%	0	0.0%	18	10.2%



1504	13	76.5%	0	0.0%	1	5.9%	2	11.8%	1	5.9%	17	9.6%
1505	13	76.5%	0	0.0%	2	11.8%	2	11.8%	0	0.0%	17	9.6%
1506	10	58.8%	0	0.0%	3	17.6%	3	17.6%	1	5.9%	17	9.6%
1507	8	72.7%	0	0.0%	1	9.1%	1	9.1%	1	9.1%	11	6.2%
1508	6	85.7%	0	0.0%	0	0.0%	1	14.3%	0	0.0%	7	4.0%
1509	10	71.4%	1	7.1%	1	7.1%	0	0.0%	2	14.3%	14	7.9%
1510	15	83.3%	0	0.0%	2	11.1%	1	5.6%	0	0.0%	18	10.2%
1511	21	65.6%	2	6.3%	3	9.4%	5	15.6%	1	3.1%	32	18.1%
1512	5	55.6%	0	0.0%	2	22.2%	2	22.2%	0	0.0%	9	5.1%
Total	130	73.4%	3	1.7%	18	10.2%	20	11.3%	6	3.4%	177	100.0%

Source: <http://www.ffiec.gov/hmda>



The following tables show the disposition of conventional loans disaggregated by minority status and income level for the New Haven-Milford Metropolitan Statistical Area, they do not include data on applications where race or ethnicity was not indicated or joint applications. The number of applications for conventional loans submitted by White, non-Hispanic applicants significantly outnumbers minority applicants in each income level analyzed. Denial rate differences are considered to be disproportionate if the difference is 10% or greater between two groups. The percentages are based on the number of applicants in each minority status category, and since the White, non-Hispanic applicants far outnumber the minority applicants in each category, the results may be slightly misleading.



Table IV-13 indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino applicants outnumber Hispanic or Latino applicants. Applicants that did not report race were excluded. White applicant origination rates are 2.3% higher than minority group origination rates. Denial rates are lower among minority applicants at the lowest income levels by 6.4%, and this is not considered disproportionate.

**Table IV-13 – Disposition of Applications by Minority Status,
Less than 50% of National Median Income (2017)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	349	79.7%	208	59.6%	9	2.6%	89	25.5%	29	8.3%	14	4.0%	349	79.7%
Minority, not-including Hispanic or Latino	89	20.3%	51	57.3%	1	1.1%	17	19.1%	16	18.0%	4	4.5%	89	20.3%
Total	438	100.0%	259	59.1%	10	2.3%	106	24.2%	45	10.3%	18	4.1%	438	100.0%
Hispanic or Latino	88	17.0%	56	63.6%	4	4.5%	15	17.0%	7	8.0%	6	6.8%	88	17.0%
Not Hispanic or Latino	430	83.0%	255	59.3%	9	2.1%	105	24.4%	44	10.2%	17	4.0%	430	83.0%
Total	518	100.0%	311	60.0%	13	2.5%	120	23.2%	51	9.8%	23	4.4%	518	100.0%

Source: <http://www.ffiec.gov/hmda/>



Table IV-14 indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino applicants outnumber Hispanic or Latino applicants. White applicant origination rates are higher than minority group origination rates by 6.8%, and denial rates are higher among minority applicants by 4.7%, this is not considered to be disproportionate.

**Table IV-14 – Disposition of Applications by Minority Status,
50-79% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	963	83.1%	724	75.2%	21	2.2%	92	9.6%	100	10.4%	26	2.7%	963	83.1%
Minority, not-including Hispanic or Latino	196	16.9%	134	68.4%	4	2.0%	28	14.3%	21	10.7%	9	4.6%	196	16.9%
Total	1,159	100.0%	858	74.0%	25	2.2%	120	10.4%	121	10.4%	35	3.0%	1,159	100.0%
Hispanic or Latino	239	17.4%	176	73.6%	8	3.3%	30	12.6%	17	7.1%	8	3.3%	239	17.4%
Not Hispanic or Latino	1,133	82.6%	841	74.2%	22	1.9%	118	10.4%	118	10.4%	34	3.0%	1,133	82.6%
Total	1,372	100.0%	1,017	74.1%	30	2.2%	148	10.8%	135	9.8%	42	3.1%	1,372	100.0%

Source: <http://www.ffiec.gov/hmda/>



Table IV-15 indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino applicants outnumber Hispanic or Latino applicants. Minority group origination approval rates are lower than white origination rates by 2.7%, and denial rates are higher among minority applicants by 5.2%, however, this is not considered to be disproportionate.

**Table IV-15 – Disposition of Applications by Minority Status,
80-99% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	736	85.0%	563	76.5%	32	4.3%	46	6.3%	76	10.3%	19	2.6%	736	85.0%
Minority, not-including Hispanic or Latino	130	15.0%	96	73.8%	1	0.8%	15	11.5%	12	9.2%	6	4.6%	130	15.0%
Total	866	100.0%	659	76.1%	33	3.8%	61	7.0%	88	10.2%	25	2.9%	866	100.0%
Hispanic or Latino	123	12.6%	88	71.5%	4	3.3%	15	12.2%	12	9.8%	4	3.3%	123	12.6%
Not Hispanic or Latino	851	87.4%	648	76.1%	34	4.0%	59	6.9%	86	10.1%	24	2.8%	851	87.4%
Total	974	100.0%	736	75.6%	38	3.9%	74	7.6%	98	10.1%	28	2.9%	974	100.0%

Source: <http://www.ffiec.gov/hmda/>



Table IV-16 indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino applicants outnumber Hispanic or Latino applicants. White applicant origination rates are higher than minority group origination rates by 4.3%, however denial rates are higher among minority applicants by 10.0%, which is considered to be disproportionate.

**Table IV-16 – Disposition of Applications by Minority Status,
100-119% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	631	86.4%	492	78.0%	14	2.2%	39	6.2%	72	11.4%	14	2.2%	631	86.4%
Minority, not-including Hispanic or Latino	99	13.6%	73	73.7%	0	0.0%	16	16.2%	9	9.1%	1	1.0%	99	13.6%
Total	730	100.0%	565	77.4%	14	1.9%	55	7.5%	81	11.1%	15	2.1%	730	100.0%
Hispanic or Latino	75	9.5%	57	76.0%	2	2.7%	7	9.3%	7	9.3%	2	2.7%	75	9.5%
Not Hispanic or Latino	715	90.5%	552	77.2%	14	2.0%	53	7.4%	79	11.0%	17	2.4%	715	90.5%
Total	790	100.0%	609	77.1%	16	2.0%	60	7.6%	86	10.9%	19	2.4%	790	100.0%

Source: <http://www.ffiec.gov/hmda/>



Table IV-17 indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino applicants outnumber Hispanic or Latino applicants. White applicant origination rates are higher than minority group origination rates by 7.9%, and denial rates are higher among minority applicants by 2.0%, though neither is considered disproportionate for this income group.

**Table IV-17 – Disposition of Applications by Minority Status,
120% or More of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	2,454	87.3%	1,880	76.6%	83	3.4%	164	6.7%	256	10.4%	71	2.9%	2,454	87.3%
Minority, not-including Hispanic or Latino	358	12.7%	246	68.7%	12	3.4%	31	8.7%	45	12.6%	24	6.7%	358	12.7%
Total	2,812	100.0%	2,126	75.6%	95	3.4%	195	6.9%	301	10.7%	95	3.4%	2,812	100.0%
Hispanic or Latino	185	6.3%	142	76.8%	2	1.1%	15	8.1%	21	11.4%	5	2.7%	185	6.3%
Not Hispanic or Latino	2,740	93.7%	2,075	75.7%	94	3.4%	191	7.0%	286	10.4%	94	3.4%	2,740	93.7%
Total	2,925	100.0%	2,217	75.8%	96	3.3%	206	7.0%	307	10.5%	99	3.4%	2,925	100.0%

Source: <http://www.ffiec.gov/hmd>



Table IV-18 offers a closer look at the denial rates of conventional loans by denial reason and income level. For applicants earning less than 50%, 50%-79% and 80-99% of Area Median Income, the most common reasons for denial are Debt-to-Income Ratio, closely followed by Collateral. For applicants earning 110-119% and 120% Area Median Income the most common reasons for denial are Debt-to-Income Ratio, Collateral, and Credit Application Incomplete. Overall, the three most common reasons for denial are Debt-to-Income Ratio (26.9%), Collateral (26.0%), and Credit History (13.3%).



Table IV-18 – Conventional Loan Denial Rates by Denial Reason and Income Level (2017)

	Less than 50%		50-79%		80-99%		100-119%		120% or More		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt to Income Ratio	50	46.3%	41	28.1%	18	24.0%	11	19.6%	33	16.7%	10	41.7%	163	26.9%
Employment History	2	1.9%	2	1.4%	0	0.0%	0	0.0%	1	0.5%	0	0.0%	5	0.8%
Credit History	15	13.9%	20	13.7%	7	9.3%	7	12.5%	27	13.6%	5	20.8%	81	13.3%
Collateral	19	17.6%	36	24.7%	19	25.3%	18	32.1%	64	32.3%	2	8.3%	158	26.0%
Insufficient Cash	5	4.6%	9	6.2%	5	6.7%	4	7.1%	9	4.5%	1	4.2%	33	5.4%
Unverifiable Information	2	1.9%	3	2.1%	2	2.7%	5	8.9%	9	4.5%	2	8.3%	23	3.8%
Credit Application Incomplete	7	6.5%	17	11.6%	13	17.3%	7	12.5%	32	16.2%	2	8.3%	78	12.9%
Mortgage Insurance Denied	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other	8	7.4%	18	12.3%	11	14.7%	4	7.1%	23	11.6%	2	8.3%	66	10.9%
Total Denials/ % of Total	108	17.8%	146	24.1%	75	12.4%	56	9.2%	198	32.6%	24	4.0%	607	100.0%

Source: <http://www.ffiec.gov/hmda/>



In summary, the HMDA Data indicates that low income households have a higher rate of denial than higher income households do. Overall, in the United States, the origination rate of conventional loans is approximately 70% according to data from 2017. During this same period, the overall origination rate for the City of Milford was 61.8%. In all income groups, White, non-minority applicants for a conventional home purchase loan substantially outnumber minority applicants. The percentage of total applications by Whites accounts for 76.76% of the total number of applications, regardless of income. Loan origination rates are higher for White applicants than for minority applicants as a whole and minority denial rates are higher than White denial rates. These differences among groups are not considered to be disproportionate and do not suggest any patterns of discrimination in lending practices.



Table IV-19 – Home Purchase Loan Applications by Race (2017)

Race	Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Applications Closed for Incompleteness		Purchased Loans		Total
	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count
American Indian/Alaska Native	11	68.8%	2	12.5%	-	0.0%	2	12.5%	1	6.3%	16	11	68.8%
Asian	239	71.8%	8	2.4%	29	8.7%	39	11.7%	18	5.4%	333	239	71.8%
Black or African/American	259	66.8%	5	1.3%	62	16.0%	41	10.6%	21	5.4%	388	259	66.8%
Native Hawaiian or Other Pacific Islander	11	50.0%	2	9.1%	3	13.6%	5	22.7%	1	4.5%	22	11	50.0%
White	4,278	75.2%	174	3.1%	502	8.8%	565	9.9%	172	3.0%	5,691	4,278	75.2%
2 or More Minority Races	4	44.4%	-	0.0%	-	0.0%	4	44.4%	1	11.1%	9	4	44.4%
Joint (White/Minority Race)	76	73.1%	1	1.0%	13	12.5%	12	11.5%	2	1.9%	104	76	73.1%
Race not Available	588	69.1%	22	2.6%	85	10.0%	111	13.0%	45	5.3%	851	588	69.1%
Hispanic or Latino (Any Race)*	413	72.1%	18	3.1%	74	12.9%	47	8.2%	21	3.7%	573	413	72.1%
Total	5,466	73.7%	214	2.9%	694	9.4%	779	10.5%	261	3.5%	7,414	5,466	73.7%

*Not included in totals by action taken (bottom row) due to double-counting as Hispanic or Latino can be any race.

Source: <http://www.ffiec.gov/hmda/>



D. Citizen Participation:

The City of Milford's FY 2020 Analysis of Impediments to Fair Housing Choice was made available for public comment on the City's website, and copies were made available upon request. The document was available beginning on July 9, 2020, until July 24, 2020. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments by July 24, 2020.

As a part of the consolidated planning process, the City of Milford distributed a Community Survey which was made available in through a Weblink: <https://www.surveymonkey.com/r/Milford5YearPlan>. Additionally, the survey was sent to service providers and community groups to distribute to clients.

There was a total of one-hundred sixty-one (161) questionnaires completed and returned.

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 72.65% and 87.72% of respondents are White.
- Two-thirds (68.03%) of respondents are over the age of 50.
- Of the 121 individuals that answered the question, 16.5% are low- to moderate-income based on their family size.
- Over half (56.9%), come from one or two-person households.
- 84.50% indicated they are homeowners; 11.63% indicated they are renters; 2.33% indicated they were living with friends or relatives.

Some of the notable needs identified by respondents included housing needs with the following: *Note that not all participants answered every question.*

- Housing Choice Options with Affordability – 53.96%
- Minor/Major Housing Repairs – 27.34%
- Rent/Mortgage Assistance – 25.90%
- Security Deposit Program – 14.39%
- ADA Accessibility – 17.27%
- Lead-Based Paint Removal – 12.23%
- Rent Commission – 7.91%
- Negligent/Absent Property Owners or Landlords – 37.41%



- Fair Housing Counseling – 14.39%
- Landlord Engagement Program – 13.67%
- Supportive Housing – 25.90%

Additional Comments or Concerns:

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question. *Note: not all participants answered every question.*

Public Facilities/Infrastructure:

- 44.22% mentioned the need to address flooding in the City.
- 45.58% mentioned the need for improvements to City Streets.
- 49.66% mentioned the need for improvements to curbs/sidewalks.
- 42.18% mentioned the need for improvements to parking.
- 41.50% mentioned issues with blight and derelict property owners.
- 39.46% mentioned the need for increased pedestrian and bicycle safety measures.
- The following issues each received 35.0% or less of the responses:
 - ADA Accessibility.
 - Traffic.
 - Storm Sewers
 - Sanitary Sewers.
 - Litter.
 - Property Maintenance.
 - Waste Water.
 - Historic Preservation.
 - Code Enforcement.

Neighborhood Facilities:

The only Neighborhood Facilities topic that drew consistent mentions from respondents was Walking and Biking Trails, with a desire for more “Open Space” a distant second.

- Walking/Biking Trails – 47.86%
- Open Space -37.14%



- Public Library – 32.14%
- Trees – 31.43%
- Lighting – 29.29%
- The following issues received less than 29% of the responses:
- Playground Equipment
- ADA Accessibility
- Police
- Community Engagement
- Fire Equipment
- Arts

Programs that are lacking or could be improved:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on programs missing or under-funded in the City. Residents indicated the need for more arts programs and public parking spaces. Others mentioned the need for Day Program/Basic Needs services for low/income individuals, a mental health library, a new housing authority housing development, support for the Public Works department, and a need for food services for homebound elderly residents.

Employment:

- 52.63% are concerned with a lack of job opportunities.
- 43.09% identified a need for job skill training.
- 36.59% indicated a need for small business incubators.
- 36.59% indicated a need for senior-specific employment training.
- 35.09% would like additional childcare options.
- 35.09% want further transportation options.

The following issues received 25% or less of the responses:

- Employer Job Training – 21.14%
- Micro-Enterprise Assistance – 17.89%
- Discriminatory Practices – 15.79%



Transportation:

- 50.52% mention a lack of parking.
- 46.39% mention a desire for more bike lanes.
- 44.33% indicate a desire for more walking trails.
- 20.62% indicate not enough service hours for public transit

The following issues received 20% or less of the responses:

- Disconnected routes
- Unreliable Public Transit
- Unsafe Public Transit
- Cost of Service

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on transportation problems in the City. Residents indicated that not enough people ride public transit, sidewalks in residential areas are sparse, some areas need additional bus shelters, and “drivers do not respect pedestrians in the crosswalk.”

Top crime concerns:

- 57.94% mention theft as a problem
- 51.59% mention drugs as a problem
- 40.48% mention loitering as a problem
- 37.30% mention vandalism as a problem
- 24.60% mention concerns with domestic violence

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on crime issues in the City. Responses mention concerns over homeless individuals in the downtown area who are panhandling, but overall crime is low.

Blight/Clearance:

- 74.11% mention vacant commercial structures
- 39.29% mention vacant residential structures
- 25.89% mention open dumping grounds
- 25.00% mention uncut lawns



- 23.21% mention squatting and vacant lots.

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on blight/clearance issues in the City. Residents mentioned concerns about the City's response times with issues of blight, vacant lots are limited but apparent, unfinished construction, and litter along roadsides.

Housing:

- 53.96% mention housing choice options with affordability
- 37.41% mention concerns of negligent Landlords
- 27.34% mention needs for minor and major housing repairs
- 25.90% mention the need for rent/mortgage assistance
- 25.90% mention needs for supportive housing.

The following issues received 25% or less of the responses:

- 17.27% mention need for ADA accessibility
- 14.39% mention need for a security deposit program
- 14.39% mention need for Fair Housing counseling.
- 12.23% mention concerns of Lead-Based Paint Removal

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on housing issues in the City. Residents mentioned that there should be housing for less fortunate people, but another resident calls for the removal of public and low income housing.

Fair Housing:

Responses to "are residents of the City of Milford aware of how to report fair housing violations or concerns?":

- 8.4% Yes
- 35.11% No
- 56.49% Unsure

Residents were asked "to whom should you report fair housing violations or concerns?" as an open-ended question. Six provided a response. One



respondent indicated they did not know. Others suggested the City, HUD, and the health inspector/health department.

Reasons Fair Housing Complaints Are Not Reported:

Respondents were asked to identify why fair housing violations may not be reported. The following were most commonly mentioned:

- 61.26% indicated that a person may not know how
- 57.66% and 49.55 indicated retaliation and fear, respectively
- 45.05% indicated people may distrust the process

Residents were asked to indicate to the degree in which they agree or disagree if the following situations result in further discrimination and/or pose as a barrier to fair housing in the City of Milford:

Table IV - 20

	Strongly Agree	Agree	Neutral/Unsure	Disagree	Strongly Disagree
State or local laws and policies that limit housing choice	11.11%	22.22%	50.93%	9.26%	6.48%
Lack of fair housing organizations in the city	9.43%	17.92%	56.60%	9.43%	6.60%
Lack of knowledge among bankers/lenders regarding fair housing	7.62%	12.38%	58.10%	14.29%	7.62%
Lack of knowledge among landlords regarding fair housing	9.71%	24.27%	48.54%	12.62%	4.85%
Lack of knowledge among real estate agents regarding fair housing	7.77%	19.42%	44.66%	20.39%	7.77%
Lack of knowledge among residents regarding fair housing	21.57%	38.24%	32.35%	6.86%	0.98%
Lack of accessible housing for persons with disabilities	9.90%	27.72%	50.50%	7.92%	3.96%
Lack of accessibility in neighborhoods (i.e. curb cuts)	6.86%	25.49%	47.06%	14.71%	5.88%
Lack of fair housing education	6.93%	18.81%	64.36%	4.95%	4.95%



Lack of affordable housing in certain areas	20.79%	28.71%	29.70%	11.88%	8.91%
Concentration of subsidized housing in certain neighborhoods	19.42%	30.10%	36.89%	7.77%	5.83%
Other barriers	10.77%	9.23%	75.38%	4.62%	0.00%

Additional Comments or Concerns:

- A desire for “A Campaign to Keep Milford Clean and Beautiful,” citing litter, beer cans, and small liquor bottles strewn about town.
- The City should find a permanent home for the Boys & Girls Club.
- “The City of Milford does not have truly affordable housing for low income peoples or people with only one income.”
- “There are too many establishments that serve alcohol in the downtown area and who act as night clubs on the weekends in which people are getting highly intoxicated. Also, people in the downtown area are driving too fast and make crossing streets dangerous at times despite crosswalks. Parking in the downtown area and neighborhoods is a disaster.”
- “Seen a good amount of homeless people in the city in recent years, would be good to expand funding for programs being run at organizations like Beth-El Center which works in this space.”
- The City took down too many trees to make room for multi-family housing, which subsequently increased traffic; it is getting harder to breathe clean air in Milford.
- Development must be balanced with quality of life in the community; there should be more redevelopment of existing property as opposed to brownfield development.



V. Actions and Recommendations

The City of Milford's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments:

- **Impediment #1 – Fair Housing Education and Outreach:**

There is a continuing need to educate the public about the Fair Housing Act and the rights of the individuals and families as members of the protective classes, and a commitment from the City Officials to Affirmatively Further Fair Housing in the community.

Goal: Raise community awareness of fair housing and further fair housing choice especially for the low-income and disabled members of the population.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **1-A:** Continue to promote Fair Housing awareness through the social media, public service announcements, hosting seminars, and providing training to promote educational opportunities for all persons to learn about their rights and other people's rights under the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, and other Federal and State statutes.
- **1-B:** Continue to prepare, promote and distribute literature and informational material in both English and Spanish, on Fair Housing issues, an individual's housing rights, and a landlord's responsibility to comply with the Fair Housing Act to make reasonable accommodations.
- **1-C:** Promote and educate potential homebuyers that they have the right to live outside areas that have a high concentration of poverty.
- **1-D:** Work with the local Board of Realtors © to educate, train, and promote fair housing and prevent discriminatory practices such as "red lining" and "steering."

- **Impediment #2 – Quality of Housing Vs. Affordability:**

There is a supply of affordable housing, however the quality of the housing is below the local building code standards. Low-income tenants tend to be cost burdened and spend more than 30% of their total household income on housing expenses for code deficient apartments.



Goal: Increase the supply of decent, safe, sound, and affordable rental housing for low-income persons and families through rehabilitation and new construction.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **2-A:** Provide funds and incentives for property owners to rehabilitate their existing rental units to be affordable to accommodate the housing needs of low-income individuals and families.
- **2-B:** Continue to enforce local codes and ordinances to ensure that rental units meet the minimum property standards.
- **2-C:** Promote and encourage the local Housing Authority to provide their housing choice voucher holders with the opportunity to become homeowners and use their voucher to make mortgage payments.
- **2-D:** Continue to support the Low Income Housing Tax Credit (LIHTC) Program and promote the development of mixed income rental housing.
- **2-E:** Continue to promote new development to abide by the State of Connecticut Law, "Affordable Housing Land Use Appeals", Section 8-30g, that requires at least 10% of the housing in the community be affordable through deed restriction or government program requirement.

• **Impediment #3 – Lack of Quality Affordable Housing For Home Buyers:**

There is a lack of housing resources for low- and moderate-income households to purchase a home in the City. Houses that are affordable are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing for sale through rehabilitation and new construction.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **3-A:** Financially support and assist low- and moderate-income households to purchase a home in the City.
- **3-B:** Financially support and promote the development of affordable in-fill housing on vacant lots throughout the City.
- **3-C:** Continue to fund and promote homeowner housing rehabilitation and emergency repairs.



- **3-D:** Provide financial support and incentives to developers and non-profits to construct new affordable housing low- and moderate-income families.
- **3-E:** Encourage, financially support and promote the development of mixed income housing for sale in the City.

- **Impediment #4 – Continuing Need for Accessible Housing:**

As an older built-up environment, there is a lack of accessible housing units in the City of Milford. Over 45% of the City's housing stock were built over 60 years ago and do not have accessibility features, while 10.4% of the City's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **4-A:** Support the City's Housing Rehabilitation Program to increase the number of accessible housing units for homeowners and renters.
- **4-B:** Encourage the development of new housing that is accessible and visitable to the physically disabled.
- **4-C:** Continue to enforce the ADA and Fair Housing requirements for rental property, and make "reasonable accommodations" for tenants who are disabled.
- **4-D:** Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

- **Impediment #5 – Economic Issues Affecting Housing Choice:**

There is a lack of economic opportunities in the City of Milford which prevents low-income households from increasing their financial resources to be able to choose to live outside areas of concentration.

Goal: The local economy will continue to improve by providing new job opportunities, which will increase household income, and will promote Fair Housing Choice.



Strategies: In order to meet this goal, the following activities and strategies may be undertaken by the City of Milford to achieve the goal.

- **5-A:** Strengthen partnership than enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- **5-B:** Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- **5-C:** Support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income and minority neighborhoods.
- **5-D:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.



VI. Approval

The City of Milford approved the FY 2020-2023 Analysis of Impediments to Fair Housing Choice at its regular Board of Alderman meeting on August 3, 2020. Attached is the resolution.



VII. Certification

Signature Page:

I hereby certify that this 2020-2024 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant Program regulations.

Benjamin G. Blake, Mayor, City of Milford, CT

Date



VII. Appendix

The following items are in the appendix:

- A. Agency/Organization Meetings and Additional Consultations**
- B. Resident Surveys and Agency Surveys:**
- C. Citizen Participation:**



A. Agency/Organization Meetings and Additional Consultations



B. Resident Survey and Agency Survey



C. Citizen Participation

Attached is the following supporting documentation:

- First Public Hearing Notice
- First Public Hearing Sign-In Sheets
- First Public Hearing Agenda
- First Public Hearing Minutes
- Second Public Hearing Notice
- Second Public Hearing Sign-In Sheets
- Second Public Hearing Agenda
- Second Public Hearing Minutes