



ECONOMIC & COMMUNITY DEVELOPMENT DEPARTMENT

FY 2020-2024 FIVE YEAR CONSOLIDATED PLAN

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City of Milford, Connecticut

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Milford, Connecticut is an entitlement jurisdiction under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In compliance with the HUD regulations, the City of Milford has prepared its FY 2020-2024 Five-Year Consolidated Plan for the period of October 1, 2020 through September 30, 2021. The consolidated plan is a strategic plan for the implementation of the City's Federal Programs for housing, community and economic development.

The Five-Year Consolidated Plan establishes the City's goals for the next five (5) year period and outlines the specific initiatives the City will undertake to address its needs and objectives by promoting: the rehabilitation and construction of decent, safe, and sanitary housing; creating a suitable living environment; removing slums and blighting conditions; promoting fair housing; improving public services; expanding economic opportunities; and principally benefitting low- and moderate-income persons.

This Five-Year Consolidated Plan is a collaborative effort of the City of Milford, the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through a series of public meetings, stakeholder interviews, resident surveys, statistical data, and review of the City's other community plans.

Maps:

Included in the Exhibits Section are the following maps which illustrate the demographic characteristics of the City of Milford:

- Population Density by Block Group
- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65+ by Block Group
- Population Age 65+ by Block Group
- Housing Unit Density by Block Group
- Percent Owner-Occupied Housing Units by Block Group
- Percent Renter-Occupied Housing Units by Block Group
- Percent Vacant Housing Units by Block Group
- Low/Moderate Income Percentage by Block Group

Available Funds

The City of Milford will utilize its Federal Award and anticipated Program Income it may receive to address the priority needs and goals identified in the City of Milford's FY 2020-2024 Consolidated Plan. The following funding allocation detail is provided in the FY 2020 Annual Action Plan in Section SP-35, AP-15, AP-35 and AP-38.

• FY 2020 CDBG Allocation -	\$515,464.00
• Anticipated CDBG Program Income -	<u>\$ 10,000.00</u>
Total Funds -	\$525,464.00

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The purpose of City of Milford's FY 2020-2024 Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for the City. The following are strategies, priority needs, objectives, and goals that have been identified for the five-year period of FY 2020 through FY 2024:

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, 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 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 (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 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 (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, persons 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 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 (Priority/ Level 2)

Priority Needs: There is a need to improve public and private property, neighborhood facilities and infrastructure, and expand public transportation services to improve the quality of life of 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 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 (Priority/Level 3)

Priority Need: There is a need for employment opportunity, 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: To continue sound program administration practices, provide City support, when necessary, to facilitate and execute public facility and infrastructure improvements using 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.
- **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.

3. Evaluation of past performance

The City of Milford has a good performance record with HUD. The City regularly meets the performance standards established by HUD. Each year the City prepares its Consolidated Annual Performance and Evaluation Report (CAPER). This report is submitted within ninety (90) days after the start of the new program year. Copies of the CAPER are available for review at the City of Milford's Community Development Office.

The FY 2019 CAPER, which was the fourth CAPER for the FY 2015-2020 Five-Year Consolidated Plan, was approved by HUD. In the FY 2019 CAPER, the City of Milford expended 71.69% of its CDBG funds to benefit low- and moderate-income persons. The City expended 19.53% of its funds during this CAPER period on Planning and Administration, which is slightly under the statutory maximum of 20%.

4. Summary of citizen participation process and consultation process

The City of Milford followed its Citizen Participation Plan in the planning and preparation of the Five-Year Consolidated Plan. The City held a public hearing on the needs of the community and its residents on February 12, 2020. This provided residents, agencies and organizations with the opportunity to discuss the City's CDBG program and to provide suggestions for future CDBG Program priorities and activities.

The City sent emails to agencies and organizations to contact them as part of the planning process. The City also present its previous performance under the CDBG Program and discussed eligible and ineligible program activities and projects.

A copy of the "Five Year Consolidated Plan and the FY 2020 Annual Action Plan" was placed on public display for review by the general public, agencies and organizations in the community. A

newspaper notice announcing that the document was placed on public display was published in the newspaper of general circulation in the area. The "Draft Five Year Consolidated Plan and the FY 2020 Annual Action Plan" were on the City's website for public review and comment.

Copies of the FY 2020-2024 Consolidated Plan were also at:

- Economic & Community Development Office - 70 West River Street, Milford, CT 06460

A resident survey was prepared and sent out to residents. A link was placed on the City's website and distributed prior to and during the Tuesday, February 11, 2020 Needs Public Hearing. The results of the survey were used to help determine the goals and outcomes. A more detailed analysis and description of the citizen participation process is contained in Section PR-15 Citizen Participation.

5. Summary of public comments

The City of Milford held its First Public Hearing on February 12, 2020 at 5:00 p.m. Comments received at that public hearing are included in the attachments at the end of the Five-Year Plan.

The Five-Year Consolidated Plan and FY 2020 Annual Action Plan were placed on public display from Thursday, July 9, 2020 through Friday, July 24, 2020 and on the City's website. Comments that were received during the comment period are included in the attachments at the end of the Five-Year Consolidated Plan. The Citizen Participation process includes the newspaper ads, meeting flyers, social media postings, the sign-in sheets, and the summary of the minutes from the public hearings.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and suggestions that were received to date, have been accepted and incorporated into the planning documents.

Any comments received during the comment period for the FY 2020-2024 Five Year Consolidated Plan and FY 2020 Annual Action Plan are listed in the Appendix Section.

7. Summary

The main goals/strategies of the Five-Year Consolidated Plan are to improve the living conditions of low- and moderate income residents of the City of Milford, create a suitable and sustainable living environment, and to address the housing and community development needs of the residents.

The Five-Year Consolidated Planning process requires that the City prepare in a single document its strategies and goals to address housing needs; establish and maintain a suitable living environment; and to encourage economic opportunities for every resident.

The City will use the Consolidated Plan goals/strategies to allocate CDBG funds over the next five (5) year period and to provide direction to its strategic planning partners, participating agencies and stakeholders, to address the housing and community development needs of the low- and moderate-income residents of the City of Milford. HUD will evaluate the City's performance based on the goals/strategies established in the Five-Year Consolidated Plan.

A “draft” of the Five Year Consolidated Plan and FY 2020 Annual Action Plan was placed on display at 70 West River Street at the offices of the Economic and Community Development Department. The display period started on Thursday, July 9, 2020 through Friday, July 24, 2020 for a 15-day display period. In addition, the City put the draft Plans on its website, available at the following URL: <https://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-annual-reports>. Upon completion of the 15 day comment period, and approval by the City Council, the City of Milford submitted the Five Year Consolidated Plan and FY 2020 Annual Action Plan to the U.S. Department of Housing and Urban Development Hartford Office on or before the due date on August 15, 2020.

8. Budget

During the FY 2020 Program Year, the City of Milford, CT will receive the following Federal funds.

- CDBG funds = \$515,464

The City of Milford proposes to undertake the following activities with the FY 2020 CDBG funds:

1. Beth-El Center, Inc. – No Freeze Emergency Shelter, Staff	\$ 17,000
2. Beth-El Center, Inc. – Soup Kitchen, Staff	\$ 14,000
3. Boys & Girls Club – After School Program, Staff	\$ 10,500
4. Literacy Volunteers of S.C. – Adult ESL Program, Director	\$ 3,000
5. Milford Senior Center – Transportation, Driver	\$ 7,000
6. Milford Department of Human Services- Rent & Mortgage Assistance	\$ 15,000
7. Rape Crisis Center – Sexual assault victims, Staff	\$ 3,319
8. Tenant Landlord Counseling – Engage landlords, mitigate dispute	\$ 2,000
9. CDBG Security Deposit Program – Reimbursement to agency	\$ 5,500
10. Milford Transit District – Bid Contingency and/or Project Manager	\$ 5,000
11. DPW, City of Milford – ADA Curb Cuts & Sidewalk	\$ 60,000
12. DPW, Open Space, Complete – Beaver Brook ADA Trail	\$ 56,052

13. ECD, Economic Business Development – Micro Enterprise Program	\$ 30,000
14. CDBG Housing Program – Single-Family Program(s) Housing Repair	\$ 59,000
15. CDBG Housing Program – Multi-Family Housing Projects	\$ 75,000
16. CDBG Housing Admin Program – Applicant verification	\$ 35,000
17. CDBG Homeownership Program – Applicant verification	\$ 15,000
18. Program Administration & Planning	<u>\$103,093</u>
Total -	\$515,464

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. **Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following agency/entity is responsible for preparing the Consolidated Plan and are responsible for administration of the grant program.

Agency Role	Name	Department/Agency
CDBG Administrator	MILFORD	Economic & Community Development

Table 1 – Responsible Agencies

Narrative:

The administering lead agency for the CDBG Program is the City of Milford's Economic and Community Development Department. The Economic and Community Development Department of Milford prepares: the Five Year Consolidated Plan; Annual Action Plans; ERR's; and the Consolidated Annual Evaluation Reports (CAPER); processes pay requests; and performs contracting, monitoring, and oversight of the programs on a day to day basis. In addition, the City has a private planning consulting firm available to assist the City in the preparation of the Five Year Plan, FY 2020 Annual Action Plan, and the Analysis of Impediments to Fair Housing Choice.

Consolidated Plan Public Contact Information

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 City of Milford
 70 West River St
 Milford, CT 06460
 Phone: (203) 783-3230
 E-mail: sdravis@Milfordct.gov
 Website: <https://www.ci.milford.ct.us/>

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)**1. Introduction**

While preparing the FY 2020-2024 Five Year Consolidated Plan and FY 2020 Annual Action Plan, the City of Milford consulted with the Milford Redevelopment and Housing Partnership, social service agencies, housing agencies providers, and Balance of State Continuum of Care, and the City department representatives. An online survey was created for stakeholders and residents to complete which identified needs, gaps in the system, and programmatic goals for the next five years. Input from the meetings and surveys were used in the development of specific strategies and priorities for the Five-Year Consolidated Plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The City of Milford works with the following agencies to enhance coordination:

- **Milford Redevelopment & Housing Partnership** - Section 8 Housing Choice Vouchers, improvements to public housing communities, and scattered site housing.
- **Social Services Agencies** – funds to improve public services to low- and moderate-income persons.
- **Housing Providers** – funds to rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Connecticut Coalition to End Homelessness** – Statewide organization that represents homeless providers and provides training and technical services to organizations and local governments.
- **Beth-El Center** – A local agency that provides an emergency homeless shelter, a soup kitchen, and support services to the homeless and persons who may be at risk of becoming homeless.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City of Milford is a member of the Connecticut Balance of State CoC, which is divided into Coordinated Access Networks (CANs). The Greater New Haven CAN is responsible for ensuring that the goals of ending chronic homelessness in the continuum are met. Beth-El and the Connecticut Coalition to End Homelessness serve as the HMIS administrators and the Coordinated Intake Operator.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Milford is not an ESG entitlement grantee. However, the Connecticut Department of Housing is the primary recipient of ESG funds, and administers these funds throughout the State for rapid rehousing assistance, which includes a combination of case management and flexible rental assistance. The Connecticut Balance of State CoC is divided into regional Coordinated Access Networks (CANs). Milford is a part of the Greater New Haven CAN.

The Greater New Haven CAN, in partnership with the City of Milford, establishes the priorities, reviews and monitors priorities and goals, and reviews changes required by the Connecticut Balance of State CoC. CoC strategies including the prioritization of reducing the length of time it takes for a homeless individual or family to go through Rapid Rehousing, as well as increasing the number of Permanent Supportive Housing Units available. The CoC requires a Housing First approach from all ESG sub-grantees.

The Homeless Management Information System (HMIS) is a mandated computer system implemented to track homeless consumers through the Continuum of Care System and provides the continuum with an unduplicated count of those experiencing homelessness within the State of Connecticut. Journey Home is both an HMIS and CAN Lead Agency. HMIS falls under the guidelines and requirements of county government that includes an assigned compliance officer. Privacy and security plans are reviewed at least yearly, or as needed. Issues related to data quality are resolved within a timely manner. Providers with many missing values or errors are provided technical assistance.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Conservation Commission
	Agency/Group/Organization Type	Civic Leaders Planning organization Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the needs of the City of Milford residents.
2	Agency/Group/Organization	TEAM, Inc
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the needs of families, children, and the elderly in the City of Milford.
3	Agency/Group/Organization	Literacy Volunteers of Southern Connecticut
	Agency/Group/Organization Type	Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the educational needs of children in the City of Milford.

4	Agency/Group/Organization	BHcare
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services – Victims Services-Persons with Disabilities Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the needs of the City of Milford's victims of domestic violence, children, and residents requiring mental health and addiction services.
5	Agency/Group/Organization	Bridges Healthcare, Inc
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services – Victims Services-Persons with Disabilities Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the needs of the City of Milford's victims of domestic violence, children, and residents requiring mental health and addiction services.
6	Agency/Group/Organization	Boys & Girls Club of Milford
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the educational and development needs of the City of Milford's children and young adults.
7	Agency/Group/Organization	Pantochino Productions, Inc
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the educational and development needs of the City of Milford's children and young adults.
8	Agency/Group/Organization	Total Lawn Care & More
	Agency/Group/Organization Type	Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the social service needs of the City of Milford.
9	Agency/Group/Organization	Milford Redevelopment & Housing Partnership
	Agency/Group/Organization Type	Housing PHA Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Milford Redevelopment & Housing Partnership was consulted for affordable housing and public housing needs in the City.
10	Agency/Group/Organization	Connecticut Coalition to End Homelessness
	Agency/Group/Organization Type	Services-homeless Publicly Funded Institution/System of Care Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Connecticut Coalition to End Homelessness was consulted for the housing and homeless needs in the City.
11	Agency/Group/Organization	Beth-El Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth None-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Beth-El Center was consulted for the housing and homeless needs in the City.
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Table 2 – Agencies, groups, organizations who participated**Identify any Agency Types not consulted and provide rationale for not consulting**

A variety of agencies were consulted and contacted during the planning process to determine the needs. See Exhibit Section for meeting notes.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Connecticut Balance of State	It is incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
2020 Annual and Five-Year PHA Plan	Milford Redevelopment & Housing Partnership	It is incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Analysis of Impediments to Fair Housing Choice	City of Milford, Economic & Community Development Department	It is incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Continuum of Care	Beth-El Center	It is incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 3 – Other local / regional / federal planning efforts**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City of Milford's Economic and Community Development Department is the administrating agency for the CDBG program. Close coordination is maintained with the other City departments such as the Department of Land Use & Planning, the Beth El Center, and Department of Health & Human Services.

The City works closely with Regional Partners within the Southern Connecticut Regional Council of Governments to address needs and to implement projects and activities that extend beyond the City limits throughout the County. Close consultation is maintained between City and County departments to ensure the needs of the area are adequately addressed.

Narrative (optional):

The City contacted the following types of agencies:

- Mayor's Office
- Economic and Community Development
- City Planner
- Department of Public Works
- Department of Health & Human Services
- Milford Redevelopment & Housing Partnership
- Conservation Commission
- Literacy Volunteers of Southern Connecticut
- Non-Profit Domestic Violence and Child Care Centers
- TEAM Inc. and service/housing provider
- Housing Providers
- Workforce Development Organizations
- Homeless Service providers in the Greater New Haven CAN

PR-15 Citizen Participation**1. Summary of citizen participation process/Efforts made to broaden citizen participation****Summarize citizen participation process and how it impacted goal setting**

The FY 2020-2024 Consolidated Plan and FY 2020 Annual Action Plan have components to reach out and encourage citizen participation. These components are the following: request for funding from agencies/organizations; responses/proposals for funding (RFP's); meeting with agencies/organizations on how to complete the RFP; interviews and roundtable discussions with various stakeholders; conduct a needs hearing; and the "draft" plan is put on public display for 30 days. The City also prepared a resident survey questionnaire which it posted on the City's website, placed at strategic locations, and sent out via email to agencies and organizations across the City. The City received back 161 completed resident surveys. All of these comments are included in the Exhibit Section of the consolidated and annual action plans. Through the citizen participation process, the City uses resident input to develop how the plan will best serve the low- and moderate-income population, and how to reach the goals/strategies set forth in the Five-Year Consolidated Plan.

The City has followed its approved Citizens Participation Plan to develop its Five-Year Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments not accepted and reasons	U
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies	A public hearing was held on Wednesday, February 12, 2020 at 5:00 p.m..	All comments were accepted.	No
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies	None	None	No

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments not accepted and reasons	U
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	There were a total of one-hundred and sixty-one (161) people that completed the online survey.	All comments were accepted.	http://mo rd5

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City of Milford used the HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2011-2015 ACS Data Sets and 2010 Census Data, which provides information on housing needs, to prepare its estimates and projections. The tables in this section have been populated with the data sets from HUD CHAS Data, based on the American Community Survey (ACS) five-year estimates (2011-2015), and the 2014-2018 ACS estimates where available. This data is the most current information to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

The CHAS data also provides a summary of the number of households in each income category by tenure and household type, along with the percentage of such households that have a housing problem. The needs of various households, by household type within each income category, are described in this section. The extent to which the households within each group are cost burdened, severely cost burdened, and/or living in substandard housing, is examined. Also, the extent to which such problems impact minority households is described.

Milford is part of the Connecticut Balance of State Continuum of Care. Data for the development for the homeless needs section was obtained from the Beth-El Center and from the Connecticut Coalition to End Homelessness.

Additional needs for the City of Milford were obtained from input and interviews with various social service agencies, housing providers, city staff, and resident survey comments.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a, b, c)

Summary of Housing Needs

Based on a comparison between the 2009 and 2015 census population, the City of Milford had a 1% increase in population. This time period also saw a decrease in the number of households by 1,132. The most common types of households in the City of Milford are small family households, which comprise 55.0% of all households in the City followed by households that contain at least one person age 62-74 years which consist of at 21.1% and households that contain at least one person age 6 years old or younger at 7.1%. The City of Milford's 2015 Household Median Income (\$80,247) is 114% of the Median Income for the State of Connecticut (\$70,331) during this same period. Comparing the 2009 and 2015 ACS median income, the City of Milford had a 5% increase in median income.

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

Table 5 - Housing Needs Assessment Demographics

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

Number of Households Table

	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

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

According to the 2011-2015 ACS, there are 23,092 total housing units within Milford. There are 21,255 occupied housing units (92.0%) and 1,837 vacant housing units (8.0%). Among the occupied housing units, there are 16,412 owner-occupied housing units (77.2%) and 4,843 rental units (22.8%).

Housing Needs Summary Tables**1. 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
NUMBER OF HOUSEHOLDS										
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

	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
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

Table 7 – Housing Problems Table

Data
Source:

2011-2015 CHAS

2. Housing Problems 2 (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
NUMBER OF HOUSEHOLDS										
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

Table 8 – Housing Problems 2

Data Source:

2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
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

Table 9 – Cost Burden > 30%

Data Source:

2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
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

Table 10 – Cost Burden > 50%

Data Source:

2011-2015 CHAS

5. Crowding (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
NUMBER OF HOUSEHOLDS										
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

	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
Total need by income	25	10	10	15	60	0	0	0	10	10

Table 11 – Crowding Information – 1/2

Data Source:

2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

According to the 2011-2015 American Community Survey, there were 21,255 households in the City of Milford. Of those households, 6,419 (30.2%) were householders living alone. Of the City's single-person households it is estimated that: 2,550 (12.0%) were age 65 or older; and 2,403 (27.5%) of all residents age 85 and older were disabled. It is presumed that as seniors age in place, additional accommodations and supportive services will be necessary for this population. The City will need to assist in funding and collaborating with housing service providers and elderly support agencies to provide programs, activities, and accommodations for the City's growing elderly population.

The greatest need for housing assistance is associated with affordability. There is a total of 4,843 renters in Milford. For renters, 1,447 (29.9%) households experienced a housing cost burden greater than 50% AMI and 805 (16.6%) households experienced a housing cost burden greater than 30% AMI. There is a total of 16,412 homeowners in Milford. For homeowners, 2,355 (14.3%) households experienced a housing cost burden greater than 50% AMI and 1,674 (10.2%) households experienced a housing cost burden greater than 30% AMI. These statistics are supported by consultations, interviews and surveys; that point to the lack of affordable housing with accessible accommodation, and housing variety as the largest unmet housing need and a problem in the City.

Based on these estimates, it can be assumed that over a quarter of the single-family households in the City of Milford have additional special needs above and beyond the needs of the general single person household population. Special consideration in terms of housing and services for

seniors, the disabled, and low-income households should be considered while planning housing strategies in the City of Milford.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled:

Based on the 2011-2015 CHAS Data, there are 5,381 persons with a disability. It is estimated that 16.6% of all disabled renters have a housing problem that includes: cost burdened by 30%; or another type of housing problem. For disabled homeowners, 10.2% have a housing problem that includes: cost burdened by 30%; or another type of housing problem. From these estimates it can be deduced that approximately 893 disabled renters have a housing problem and approximately 549 disabled homeowners have a housing problem. A breakdown of the types of disability is as follows: hearing difficulty – 1,554 persons, 2.9%; vision difficulty – 645 persons, 1.2%; cognitive difficulty – 2,018 persons, 4.0%; ambulatory difficulty – 2,692 persons, 5.3%; self-care difficulty – 1,204 persons, 2.4%; and independent living difficulty – 1,981 persons, 4.6%.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking:

Statewide, shelters are at a 120% of capacity for this population, as is the case for New Haven County. There is a high demand for additional shelter for victims of domestic violence, dating violence, sexual assault, and stalking.

What are the most common housing problems?

In the City of Milford, the greatest number of housing problems are associated with affordability. There are 4,843 occupied rental units in Milford. For renters, 26.4% of households experienced a housing cost burden greater than 50% AMI and 14.6% of households experienced a housing cost burden greater than 30% AMI. Disproportionately affected in the 50% housing cost burden group are 0-30% AMI renters (57.4%) and in the 30% housing cost burden two categories are disproportionately affected, 0-30% AMI (26.1%) and 50-80% AMI (30.4%) renters. There are 16,412 owner occupied units in Milford. For homeowners, 14.2% of households experienced a housing cost burden greater than 50% AMI and 10.1% of households experienced a housing cost burden greater than 30% AMI. Disproportionately affected in the 50% housing cost burden group are 0-30% AMI homeowners (43.9%) and 30-50% AMI (31.4%); and in the 30% housing cost burden are 30-50% AMI (31.1%), 50-80% AMI (29.3%), and 80-100% AMI (29.9%) homeowners.

In consultations, interviews and surveys, the lack of affordable accessible, decent, and safe housing for the disabled is an unmet housing need and a problem in the City.

In addition, there is a need for permanent supportive housing for the homeless. This becomes an affordability and social service issue.

Are any populations/household types more affected than others by these problems?

Elderly and disabled populations generally are most affected by the high cost of housing in the City of Milford. Many elderly and disabled households are on fixed or limited incomes (social security or social security disability). Their income coupled with the lack of affordable housing that is decent, safe, and sound, often forces them into housing that is below code standards.

Another group adversely affected by the lack of affordable housing are the homeless and persons at-risk of becoming homeless, as well as victims of domestic violence.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Yes, the elderly and disabled populations are the most often affected by the high cost of housing in the City of Milford. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound, forces them into housing that does not meet code standards.

Very low-income households struggle to meet their housing needs based on their household income.

The City of Milford does not receive an ESG entitlement grant for local shelter facilities. Funds are provided from State ESG funds.

Specific needs of the extremely low-income who are housed, but are at risk of becoming unsheltered or living in shelters are: food, clothing, transportation and job training. The local social service agencies provide food and clothing through food pantries, food kitchens and thrift stores. However, the needs appear to be greater than the resources.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Greater New Haven Coordinated Access Network (CAN) works with the local Police, the Beth-El Center and the Department of Human Services to assist populations that are at-risk of homelessness. Persons and families at-risk of homelessness are directed toward the 2-1-1 housing

crisis line and encouraged to seek diversion. Diversion is the primary strategy to address those at imminent risk, and households are encouraged to visit the Diversion Center. If the Diversion Center cannot divert the household, they are directed toward the relevant program based on their special needs or lack thereof. Multiple organizations collaborate on the diversion initiative.

According to the HUD/HAP Standards and Operating Procedures Handbook, the definition of At-Risk of Homelessness has three categories:

Category 1: Individuals and families who

- Have annual incomes below 30% AMI; AND
- Do not have sufficient resources or support networks immediately available to prevent literal homelessness; AND
- Meet at least one of 7 conditions
- Moved 2 or more times due to economic reasons in 60 days prior to application for assistance
- Living in home of another due to economic hardship
- Lost housing within 21 days after application date
- Live in hotel/motel. Hotel/motel not paid for by charitable organizations or Federal/state/local government program
- Live in a severely overcrowded unit as defined by the US Census Bureau (Lives in a SRO or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 persons per room as defined by the US Census Bureau.)
- Exiting publicly-funded institution or system of care (e.g. health care facility, mental health facility, foster care or other youth facility or correction program or institution.)
- Lives in housing associated with instability and increased risk of homelessness as defined in the Consolidated Plan.

Category 2: Children/youth who do not qualify under other Federal Statutes;

- Do not include children/youth who qualify under the homeless definition including: Section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a (3)); Section 637 (11) of the Head Start Act (42 U.S. C. 9832 (11)); Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C.; 14043e-2 (6)); Section 330(h) (5) (A) of the Public Health Service Act (42 U.S.C. 2254 b(h)(5)(A)); Section 3 (m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012 (m)); Section 17 (b) (15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786 (b) (15))

Category 3: Unaccompanied children and youth and their families who:

- Qualify as homeless under the Education for Children and Youth [(Section 725 (2)) of the McKinney Vento Homeless Assistance Act [42 U.S.C. 11434a (2)]] and parent or guardian of that child or youth if living with her or him.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

According to HUD, those at-risk of homelessness can be defined in this manner:

Imminent Risk of Homelessness - Persons who are housed and who are at imminent risk of losing housing, including people who at program entry or program exit are experiencing one of the following:

- Being evicted from a private dwelling unit (including housing provided by family/friends);
- Being discharged from a hospital or other institution;
- Living in a hotel or motel and lacking the financial resources to remain housed in that establishment; or
- Living in housing that has been condemned by housing officials and is no longer considered meant for human habitation.

Additionally, a person residing in one of these places must also meet the following two conditions:

- Have no appropriate subsequent housing options identified; and
- Lack the financial resources and support networks needed to obtain immediate housing or remain in existing housing.

Unstably housed and at-risk of losing their housing - persons who are housed and are at-risk of losing housing include people who at program entry or program exit:

- Are in their own housing or doubled up with friends or relatives and are at-risk of losing their housing due to high housing costs, conflict, or other conditions negatively impacting their ability to remain housed;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; and
- Lack the resources and support networks needed to maintain or obtain housing

The shortage of decent, safe, and sanitary housing in the City has increased the cost of rentals which creates instability and an increased risk of homelessness for lower income families in the area. Many families are living from paycheck to paycheck and are paying over 30% of their income for housing. The Greater New Haven CAN encourages individuals that contact them who are at imminent risk of losing their housing to visit the Diversion Center, where they can explore options before entering the system of homelessness.

Other characteristics that have been linked with instability and an increased risk of homelessness can be found in HUD's criteria for defining at risk of homelessness and the CT Balance of State Continuum of Care's definition of those at Imminent Risk of Homelessness (see above).

Other characteristics linked to instability and an increased risk of homelessness include individuals being discharged from foster care, health care facilities, mental health treatment facilities, incarceration, and substance abuse treatment. It is difficult for these populations to achieve self-sufficiency because it can often take time to secure steady employment and stable housing. Individuals and families that are leaving situations where they were victims of domestic violence are also at risk. Finally, individuals and families with special needs, including the elderly, frail elderly, those with a disability, and those who are in treatment for substance abuse or HIV/AIDS are also at risk. Medical bills can be a burden and finding accessible housing can be a challenge. For people on fixed incomes, it can be difficult to make ends meet, and for those in the workforce, it can be difficult to find employment. Many people that are at risk of homelessness have limited financial resources.

Discussion

Not Applicable

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the preparation of the City of Milford’s Five-Year Consolidated Plan, an evaluation and comparison was made to determine the housing problems of any racial/ethnic group in comparison to the overall need in the City. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS Data. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The following tables highlight disproportionate needs in the City of Milford. 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%). A household is considered to have a disproportionately greater need if its housing problem is that the household is cost burdened by more than 30% of income, is experiencing overcrowding (considered more than one person per room) or has incomplete kitchen or plumbing facilities.

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

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

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

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

In the 0-30% Area Median Income category, 16.7% of Hispanic or Latino households have no/negative income, and do not have the other housing problems. There are no other racial or ethnic groups with disproportionate need at any other income levels.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

While developing its FY 2020-2024 Consolidated Plan, the City of Milford determined the extent to which any racial/ethnic group had a greater need related to severe housing problem in comparison to overall need. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS Data. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The following tables highlight disproportionate needs in the City of Milford. 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%).

A group is considered to have a disproportionately greater need if it has at least 10 percentage points higher than the percentage of households as a whole. A household is considered to have a severe housing problem if the household is cost burdened by more than 50% of income, is experiencing overcrowding (considered more than 1.5 person per room), or has incomplete kitchen or plumbing facilities. The following tables illustrate the disproportionate needs of the City of Milford.

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

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

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

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

321` 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

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

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

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

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source

2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

At the 0-30% Median Income Category, 16.7% of Hispanic or Latino households have no/negative income, and none of the other housing problems. All other housing problems were proportional to household populations in the City of Milford based on income. There were no other racial or ethnic groups that disproportionately experience severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The City of Milford in preparing its CDBG Program has determined the extent to which any racial/ethnic group has a greater need in comparison to overall need related to housing cost burden. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The following tables highlight disproportionate needs in the City of Milford. 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%).

A household is considered to be cost over-burdened if their housing costs are more than 30% of their income and is considered to be severely cost over-burdened if their housing costs are more than 50% of their income.

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

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

There is one group which are disproportionately impacted in terms of severe housing problems when compared to the jurisdiction as a whole that have a housing cost burden at greater than 50%. This is the Hispanic Group No/Negative Income 16.4% (36.6%).

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

The racial composition of the City of Milford, according to the 2014-2018 ACS Data, was 87.7% White; 3% Black/African American; 6.3% Asian; 0.1% American Indian/Alaskan Native; 0.0% Native Hawaiian/Other Pacific Islander; 0.8% Other Races; and 2.0% Two or More Races. The Hispanic or Latino population was 6.6%. These percentages reflect the types of households, where according to the 2014-2018 ACS Data, the total number of White Households in the City of Milford is 19,961 households (87.0%); the number of Black/African American Households is 515 households (2.2%); the number of American Indian and Alaska Native is 60 households (0.3%), the number of Asian Households is 1,211 households (5.3%); the number of Native Hawaiian and Other Pacific Islander is 0 households (0%), and the number of Hispanic Households is 878 households (3.8%). There is one disproportionately impacted group in terms of having a housing problem, the “no/negative income” Hispanic/Latino racial/ethnic group. There is one disproportionately impacted group in terms of having a severe housing problem, the “no/negative income” Hispanic racial/ethnic group. There were no other disproportionately impacted racial/ethnic groups in terms of having a housing cost overburden.

When examining the percentage of each racial or ethnic group that has a housing problem, a severe housing problem, or its cost of housing is overburdened, compared to that racial or ethnic group overall, a different picture presents itself. When examining housing problems, 27.8% of White households, 33.8% of Black/African American households, 16.0% of Asian households, and 50.1% of Hispanic households have a housing problem. The numbers are lower for severe housing problems: 16.7% of White households, 27.0% of Black/African American households, 7.0% of Asian households, and 39.9% of Hispanic households are experiencing a severe housing problem. Overall, these numbers show that Hispanic or Latino households in the City of Milford are much more likely to experience a housing problem than to be cost overburdened.

If they have needs not identified above, what are those needs?

There are no additional unidentified needs.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the 2014-2018 ACS Data, the City of Milford has a minority population of 12.3% of its total population. The City uses the definition of an Area of Minority Concentration as a Census Tract or Block Group where at least 35.0% of the population who reside in that area are identified as being a minority person. Based on this definition there are four (4) Census Tracts in the City with a percentage of minority persons over 35.0%: C.T. 1502, B.G. 1, C.T. 1506, B.G. 4, C.T. 1508, B.G. 1 and B.G. 4. These four census

tracts are located in the different sections of the City of Milford, two to the West, and two to the Northeast.

NA-35 Public Housing – 91.205(b)

Introduction

The Milford Redevelopment & Housing Partnership is the public housing agency that serves the City of Milford. The mission of the Milford Redevelopment & Housing Partnership is to provide decent, safe, and sanitary housing to the residents receiving assistance through the Public Housing and Section 8 Housing Choice Programs in an efficient and professional manner.

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.

According to the Milford Redevelopment & Housing Partnership's Five-Year Plan for the period of 2020 - 2024, the goals of the Housing Partnership are as follows:

- Manage the Milford Redevelopment and Housing Partnership existing public housing program in an efficient and effective manner thereby qualifying as at least a standard performer.
- Provide a safe and secure environment in Milford Redevelopment and Housing Partnership's public housing development.
- Expand the range and quality of housing choices available to participants in Milford Redevelopment and Housing Partnership tenant-based assistance program.
- Enhance the image of public housing in our community

Totals in Use

The following tables illustrate the units that are in use by residents of the Milford Redevelopment & Housing Partnership.

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Pu	F
							Veterans Affairs Supportive Housing	Uni Pr
# of units vouchers in use	0	0	313	194	0	194	0	

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special	Veterans Affairs Supportive Housing
Average Annual Income	0	0	15,792	15,379	0	15,379		
Average length of stay	0	0	5	8	0	8		
Average Household size	0	0	1	2	0	2		
# Homeless at admission	0	0	0	0	0	0		
# of Elderly Program Participants (>62)	0	0	145	42	0	42		

OMB Control No: 2506-0117 (exp. 07/31/2020)

	Program Type						
	Certificate	Mod-Rehab	Public Housing	Vouchers			
				Total	Project - based	Tenant - based	Special Veterans Affairs Supportive Housing
# of Disabled Families	0	0	109	57	0	57	
# of Families requesting accessibility features	0	0	313	194	0	194	
# of HIV/AIDS program participants	0	0	0	0	0	0	
# of DV victims	0	0	0	0	0	0	

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source:

PIC (PIH Information Center)

Race of Residents

Race	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				Special Veterans Affairs Supportive Housing
				Total	Project - based	Tenant - based		
White	0	0	259	159	0	159	0	
Black/African American	0	0	52	32	0	32	0	
Asian	0	0	1	3	0	3	0	
American Indian/Alaska Native	0	0	1	0	0	0	0	
Pacific Islander	0	0	0	0	0	0	0	

OMB Control No: 2506-0117 (exp. 07/31/2020)

Race	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Pu	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	F Uni Pr
Other	0	0	0	0	0	0	0	
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition								

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Pu	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	F Uni Pr
Hispanic	0	0	16	29	0	29	0	
Not Hispanic	0	0	297	165	0	165	0	
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition								

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Milford Redevelopment & Housing Partnership had 209 families on its Housing Choice Voucher waiting list as of June 2020. There are 170 small families, 39 large families, 16 people with disabilities, and 18 indicate that they are age 62 and over. 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 housing needs are for the applicants on the waiting list for public housing:

- **Elderly Highrise Apartments = 87**
- **One Bedroom Apartments = 185**
- **Two Bedroom Apartments = 4**
- **Three Bedroom Apartments = 4**

The waiting list for Housing Choice Vouchers (single families/individuals) is mainly for one bedroom units.

There is a need for accessible housing accommodations for the elderly applicants on the waiting list. It is estimated that approximately 48.8% of the persons on the waiting list (98 persons) are in need of accessibility accommodations.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate need of the current residents of Public Housing is for employment training, job opportunities, and transportation for shopping, medical services, and community services such as youth activities. Their housing needs are being addressed by the Public Housing Authority.

There is a need for accessible housing accommodations for people with disability on the waiting lists. The Redevelopment & Housing Partnership reported that 48.8% of the persons on the waiting list (98 persons) are in need of accessibility accommodations. The Redevelopment & Housing Partnership has been working to make reasonable accommodations to its public housing units to satisfy the Section 504 requirements for persons with physical disabilities such as mobility, visual, and hearing impairments.

The Milford Redevelopment & Housing Partnership has invested heavily in public safety and crime prevention at its public housing communities. Recently placed cameras have been extensively used for forensic development in issues between public housing residents and other outside residents.

How do these needs compare to the housing needs of the population at large

The needs of the existing public housing residents and Housing Choice Voucher Holders who earn an average annual income of \$15,379 are not the same as the population at large. For one, the general population has much higher annual incomes. In 2017 the CT HUD Metro FMR Area median income was \$93,500. In 2020 the area median income is \$108,200. Better housing conditions on an acre at or above .5 is the opportunity that comes with higher incomes. However, the needs of individuals not residents of Public Housing or Housing Choice Vouchers holders, but who are low to extremely low income, are similar. In 2017 of the 7,211 of the 20,537 households in Milford earned an annual income at or below \$59,999. There is an overall need for accommodations for the families requesting accessibility features, to create 1 and 2 bedroom units to accommodate small families and family care takers of elderly residents.

Discussion

The Milford Redevelopment & Housing Partnership is a partner with the City in addressing the housing needs for the residents of Milford who are very low and extremely low income. The City of Milford has identified the need for affordable housing that is decent, safe, and sanitary. The Redevelopment & Housing Partnership is a valuable resource in addressing that need and assist the City in providing additional housing for the significant number of residents that are at or below 50% of AMI and affected by housing problems, severe housing problems and housing cost burdens.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Milford is located in the Greater New Haven Coordinated Access Network, which is a regional district of the Connecticut Balance of State Continuum of Care. Data for the development of the needs for the homeless in the area have been obtained from the Balance of the State Continuum of Care, Beth-El Center, and the Connecticut Coalition to End Homelessness (CCEH). Specific to the City of Milford, CCEH and Beth-El Center are a member participants of the Connecticut Balance of State Consortium of Care and applies for CoC funding to benefit the City.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year
	Sheltered	Unsheltered			
Persons in Households with Adult(s) and Child(ren)	388	3	391		5
Persons in Households with Only Children	13	0	13		7
Persons in Households with Only Adults	375	3	378		5
Chronically Homeless Individuals	64	9	73		
Chronically Homeless Families	11	0	11		
Veterans	22	2	24		3
Unaccompanied Child	11	0	11		7
Persons with HIV					

**Table
26 -
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If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically homeless individuals and families – HUD has defined chronic homelessness as an individual or family with a disabling condition (mental or physical) who has been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years. The Chronically Homeless are homeless and/or who live or reside in a place not meant for human habitation, a safe haven, or in an emergency shelter. The Greater New Haven CAN utilizes Coordinated Entry (through Coordinated Access) to match chronically homeless individuals to permanent housing. The CAN partners with the police to conduct targeted outreach. The Connecticut Balance of State CoC has reduced its chronic homeless population to 73 single individuals from a high point of 179 in 2012.

Families with children – Families with children need rent and utility assistance to prevent homelessness in emergency situations, and there is also a need for transportation and car repair, as well as child care in evening/nighttime hours for working parents. Families are encouraged to go through the diversion process by scheduling an appointment with Beth-El Center when they are within 14 days of becoming homeless, and where representatives of the CAN assist the family in finding a place to stay without entering the system. The Diversion Center will also work directly with families in hotels.

Veterans and their families – The State of Connecticut has prioritized working with homeless veterans. The State of Connecticut and the Greater New Haven CAN have brought the number of chronically homeless veterans to functional 0. The progress made to assist homeless veterans has been due to partnerships with the VA and the prioritization of Supportive Services for Veteran Families (SSVF) funding to serve about 900 veterans statewide with 140 beds, as well as a number of effective outreach efforts and a “by-name” list of veterans seeking care. A total of 58 veterans were counted in the 2020 Point In Time Count.

Unaccompanied youth – Teens aging out of foster care, and young adults in the 18-24 transition stage are hard to locate. Specific needs of those in a doubled-up situation, who may be “couch-surfing”, are conflict resolution, mediation, and employment assistance to prevent imminent homelessness without income. Children aging out of foster care are protected by laws to ensure that youth are not discharged into homelessness. Homeless youth will not always identify themselves as homeless, which creates difficulties in accurately counting the number of youth that are homeless. The Youth Continuum in New Haven attempts to bring together stakeholders to focus on providing housing solutions for homeless youth. There is also a need to target interventions to LGBTQIA+ homeless youth and to provide trauma-

informed care, as unaccompanied youth who are homeless are frequently victims of domestic abuse. There were 14 unaccompanied youth counted in the 2020 Point In Time Count.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	173	37
Black or African American	211	11
Asian	1	1
American Indian or Alaska Native	3	0
Pacific Islander	2	0
Multiple Races	37	3
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	101	8
Not Hispanic	326	41

2020 New Haven County, CT Point in Time Count; Connecticut Coalition to End Homelessness - CT Balance of State Continuum of Care

Data Source Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families with Children – According to the 2020 Point-in-Time Count conducted in January 2020, there were 84 families with children that were experiencing homelessness within the Greater New Haven CAN. Some families in the region are more vulnerable than others, particularly families composed of single female householders with children, but there are disproportionately fewer shelter beds for women in the area than there are for men. There is also a need to restructure family shelters to serve all types of family compositions. Additional needs for these families include affordable housing and employment options that can meet the high cost of housing, and affordable childcare to assist 2nd and 3rd shift evening workers.

Families of Veterans - According to the 2020 Point-in-Time Count conducted in January 2020, there were 22 Veterans in emergency shelters, 36 in transitional housing, and two (2) unsheltered. The State of Connecticut has prioritized working with homeless veterans. The State of Connecticut and the Greater New Haven CAN have brought the number of chronically homeless veterans to functional 0. Supportive Services for Veteran Families (SSVF) funding is used to support families of veterans.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The homeless in the Greater New Haven CAN are mostly White, and the second most common racial/ethnic group of homeless are Black or African American. When looking more closely at the breakdown of unsheltered homeless, Whites make up the majority of unsheltered persons, at 58.7% of unsheltered homeless. Black or African American persons make up approximately half (49.4%) of the sheltered population and 17.4% of the unsheltered population. Black/African Americans make up only approximately 3% of the City residents, but nearly half of the sheltered homeless population and nearly one-fifth of the unsheltered population. The population that is at-risk of homelessness due to exiting incarceration is disproportionately Black/African American compared to the rest of the City and region. Many of the shelters in the region have undergone trainings on racial justice to address this disparity.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Unsheltered Homelessness would refer to the segment of a homeless community who do not have ordinary lawful access to buildings in which to sleep, as referred to in the HUD definition as persons occupying "a place not meant for human habitation", (examples: bus stop, beach, riverbed, van, RV, sidewalk). Many of the unsheltered homeless suffer from substance abuse and/or mental illness, and are reluctant to abide by the rules of the shelter.

Sheltered Homeless refers to those in an emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided lacking a fixed nighttime residence. People will be considered homeless if they are exiting an institution where they resided for up to 90 days (it was previously 30 days). People who are losing their primary nighttime residence, which may be a motel, hotel or a doubled-up situation within 14 days and lack resources or support networks to remain housing are considered sheltered homeless as well. The sheltered homeless typically do not have a steady source of income, or any source of income.

The Greater New Haven CAN has focused its efforts on reducing the number of chronically homeless adults and veterans who are unmatched to housing. The number of chronic homeless in the City of Milford has increased from 16 in 2019 to 64 in 2020. There were 0 chronically homeless veterans, which is down from 3 in 2019.

Matching unsheltered homeless youth to shelters has been a priority of the CAN. Homeless youth are less likely to identify themselves as homeless than adults, and this can include youth as old as 24 who are community college students. Homeless youth may be victims of domestic violence and running away due to these factors but are unlikely to report this.

The LGBTQIA+ homeless who go through diversion are more likely to decline shelter than non-LGBTQIA+ people due to a history of being stigmatized in shelters. There is a need for targeted outreach to people who are transgender that are in need of shelter.

Discussion:

The goals of the Coordinated Access Network (CAN), includes encouraging more providers and organizations that work with people with HIV/AIDS to become involved with the work of the CAN. Another priority of the CAN is to manage some of the disparities in homelessness that exist for the LGBTQIA+ community.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b, d)

Introduction:

The assessment of non-homeless special needs includes the following:

- Elderly persons (age 62 years and older)
- Frail elderly
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug additions
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

The housing need of each of these groups were determined by consultation with social service providers and statistical information provided by social services providers.

Describe the characteristics of special needs populations in your community:

- Elderly Persons are defined by the Federal government as persons who are age 62 years and older. According to the 2018 ACS Data, persons age 60 and older represent 26.2% (14,143 persons) of the City's total population; persons age 65 and older represent 18.5% (9,990 persons); and approximately 2.6% (1,394 persons) of the elderly population are age 85 years and older.
- Frail Elderly are those persons who are elderly and have a form of disability, ranging from a hearing loss, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. It is estimated that approximately 28% of the total elderly population are frail elderly.
- Persons with mental, physical and development and disabilities, comprise approximately 10.4% of the City of Milford's total population and are classified as "disabled."
- Persons with HIV/AIDS and their families comprise a small percentage of the region's overall population. According to the Center for Disease Control and Prevention, HIV Surveillance data, there were 1,370 HIV/AIDS cases living in the New Haven Region according to the CDC's "2018 Annual HIV Surveillance Summary Report."
- Persons exiting incarceration are another population that experiences additional barriers to affordable housing and employment. The City of Milford has acknowledged this subpopulation to assist them in transitioning out of incarceration.
- Victims of Domestic Violence, dating violence, sexual assault and stalking is rapidly increasing both locally and nationally. Based on the Point-in-Time Count for 2020, it is estimated that approximately 64 single family households in the Greater New Haven CAN are victims of domestic violence, dating violence, sexual assault, and stalking, and are in need of housing assistance. This estimate is based on the number of persons counted in shelters and those that were unsheltered at the time of the 2020 Point-in-Time count.

What are the housing and supportive service needs of these populations and how are these needs determined?

Based on the current HUD-CHAS Data, the 2020 Point-in-Time Count, and interviews with housing agencies and social service providers, and the City of Milford, there are a significant number of social service needs in the City that are unmet. Needs for the elderly and disabled populations include the capital improvements and programmatic funding of additional shelters and community facilities.

According to the Greater New Haven Balance of State CoC's Point-in-Time Count, the following housing and supportive service needs were determined:

- Mentally, Physically Disabled – Accessible housing/permanent supportive housing, using the Housing First model to avoid transitional housing, plus supportive services, case management for those suffering from mental illness, substance abuse, or coexisting disorders, education and job training, financial counseling, and access to health care services.
- Alcohol and Drug Addiction – Permanent supportive housing, using the Housing First model to avoid transitional housing, plus supportive services and case management for those suffering from mental illness, substance abuse, or coexisting disorders, education and job training, financial counseling, and access to health services and substance abuse counseling.
- HIV/AIDS – Permanent supportive housing plus supportive services such as case management and continued access to health services and counseling.
- Victims of Domestic Violence – Permanent supportive housing, using the Housing First model to avoid transitional housing, plus supportive services such as case management, education and job training, financial counseling, and access to victims counseling.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Persons with HIV/AIDS and their families comprise a small percentage of the region's overall population. According to the Center for Disease Control and Prevention, HIV Surveillance data, there were 1,370 people living with HIV/AIDS in the region, with 25 new diagnoses in 2018 according to the CDC's "2018 Annual HIV Surveillance Summary Report." Males are disproportionately affected nationwide, and 59.3% of individuals in the City of New Haven eligible for HOPWA assistance are male. Nationwide, Black/African American and Latino individuals are disproportionately affected by HIV/AIDS, while the demographics of persons with HIV/AIDS in New Haven compare closely to the City at 60% of individuals who are diagnosed, are Black/African American, and 28% are Hispanic or Latino. The HIV/AIDS population is staying steady. Almost all individuals diagnosed with HIV/AIDS have additional trauma and substance abuse histories. Throughout the MSA and the Nation, the population with HIV/AIDS is aging.

Discussion:

Not Applicable.

NA-50 Non-Housing Community Development Needs – 91.215 (f)**Describe the jurisdiction's need for Public Facilities:**

The following Public Facilities needs were identified by the City:

- Some sidewalks are in poor condition. The elderly, those with disabilities, and mothers with babies in strollers may have a difficult time navigating those sidewalks in poor condition in the City.
- The City should add some new trash receptacles and conduct an anti-litter campaign
- Needs for better utilization of remaining green space.

How were these needs determined?

The identified needs for public facilities improvements were determined through: the resident survey; agency needs surveys; interviews with City staff, (City of Milford Economic and Community Development Department, Milford Redevelopment & Housing Partnership, and other City agencies); public hearing comments on needs; meetings with stakeholders; and the City's Comprehensive Plan.

Describe the jurisdiction's need for Public Improvements:

The following Public Improvements needs were identified by the City:

- Some of the existing sidewalks need to be repaired.
- Other needs include property maintenance/rehabilitation and demolitions and accessibility improvements for sidewalks and other public facilities.

How were these needs determined?

The identified needs for public facilities improvements were determined through: the resident survey; agency needs surveys; interviews with City staff, (City of Milford Department of Economic and Community Development, Milford Redevelopment & Housing Partnership, the Conservation Commission, and other City agencies); public hearing comments on needs; meetings with stakeholders; and the City's Comprehensive Plan.

Describe the jurisdiction's need for Public Services:

The City of Milford provides for public safety and other public services to its residents. The following Public Services needs were identified by the City:

- The City needs to continue to support programs that assist the homeless population in the City.
- The City needs to continue to support microenterprise programs through technical assistance, advice, and business support services.

- The City needs to continue to support job training programs for youth, the unemployed, and the underemployed.
- The City needs to continue to support housing and services for the re-entry population.
- The City needs to continue to provide garbage/trash pickup, and neighborhood clean-up programs.
- The City needs to support, encourage, and affirmatively further fair housing throughout all neighborhoods.
- The City needs to continue to support programs that serve the elderly residents of the City of Milford.

How were these needs determined?

The identified needs for public facilities improvements were determined through: the resident survey; agency needs surveys; interviews with City staff, (City of Milford Department of Economic and Community Development, Milford Redevelopment & Housing Partnership, the Conservation Commission, and other City agencies); public hearing comments on needs; meetings with stakeholders; and the City's Comprehensive Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Milford is an older urban area. The City has had a small population increase in the past 10 years, as has the State of Connecticut as a whole. The housing stock in the City is older. Approximately 46.8% of all the occupied units were built before 1960, which are now over 60 years old. 22.8% of housing units are renter-occupied and 77.2% of housing units are owner-occupied.

According to the 2011-2015 ACS Data, there were 23,092 housing units in the City of Milford, of which 21,255 (92.0%) are occupied; which leaves a low vacancy rate of 8.0% in the City. Single-family detached homes are the most common type of unit, at 15,134 (71.2%) units. The second-most abundant type of housing is the 10+ unit apartments at 11.0%.

Due to its housing characteristics, the City has chosen to focus on repairing and improving its existing owner-occupied housing stock. The median home value of all owner-occupied housing units as of 2018 was \$310,100 and the median contract rent was \$1,415/month for the same time period.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to the 2011-2015 ACS data, there are 23,104 total housing units. There are 21,261 occupied housing units (16,415 owner-occupied and 4,846 renter-occupied), which means there are 1,843 vacant housing units. The majority of the owner-occupied houses are 3 or more bedrooms (73% of all owner-occupied houses). The majority of all renter-occupied housing units (74%) are 1 to 2 bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,030	69%
1-unit, attached structure	1,300	6%
2-4 units	2,140	9%
5-19 units	1,595	7%
20 or more units	1,800	8%
Mobile Home, boat, RV, van, etc	239	1%
Total	23,104	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	25	0%	334	7%
1 bedroom	800	5%	1,715	35%
2 bedrooms	3,600	22%	1,875	39%
3 or more bedrooms	11,990	73%	922	19%
Total	16,415	100%	4,846	100%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The following number of units in the City of Milford are assisted with Federal, State and Local Programs:

- **Public Housing** - 465 housing units of which 108 are elderly units and 62 are family units. The income levels are at 50% and below AMI.
- **Housing Choice Vouchers** – 267 vouchers that are all tenant based. The income levels are at 80% and below AMI.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are no units expected to be lost from the affordable housing inventory.

Does the availability of housing units meet the needs of the population?

There is a lack of housing for the very low-income residents of the City. There are 16,578 owner-occupied housing units, 5,487 renter-occupied housing units, and approximately 1,988 vacant units; for a total of 24,053 housing units in the City of Milford. The ratio of owner-occupied housing units to renter-occupied housing units is 68.9%% to 22.8%. The disparity is for affordable, decent, safe, and sanitary housing, particularly for one- to two-bedroom rental housing and housing for people with special needs. The cost of housing is way above the financial means of the very low-income.

Describe the need for specific types of housing:

The City of Milford needs to develop more low-income, elderly, and accessible housing to meet the needs of City residents. There is a need for more accessible rental housing for the elderly, frail elderly, and the disabled. There is high demand for one-bedroom and two-bedroom apartments in the City. There is also a high need for Single-Room Occupancy apartments, particularly for individuals who became recently homeless.

Discussion

There is a continuing need for “affordable” and “accessible” housing in the City of Milford. The existing housing stock is old, some of which is historic, and does not always meet the needs of the community. Most of the housing is owner-occupied housing, and housing rehabilitation requires placing long-term income limits on properties. The demolition of units to be replaced with newer units in better condition in the City can be difficult due to these restrictions. Land acquisition costs are expensive in the City.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The value of housing has decreased in the last ten years in the City of Milford. According to Zillow's website for the housing market in Milford, the median sales price in recent months is \$303,653. In 2010, based on the 2010 ACS, the median home value was \$348,200 which has decreased to \$310,100, or a 10.9% decrease, according to the 2014-2018 ACS data. Rental list prices on Zillow.com were \$1,918 in January 2020. An increase in the median contract rent (according to the American Community Survey, between 2010 and 2018) also occurred. Median rent increased from \$1,112/month to \$1,415/month. 37.2% of all rental housing units were in the less than \$1,000 per month category and approximately 16.1% were in the less than \$500 per month category.

According to Redfin.com there were roughly 56 housing units sold in May, 2020. It was reported that the median sales price was \$308,000, an increase of 4.7% from last year. There are 117 houses for sale that are active on the market. The website also reported that, "average price per square foot for, Milford, CT was \$204," an increase of 9.9% compared to the same period last year. There are currently 202 resale and new homes for Milford on Zillow. This includes 77 homes in the pre-foreclosure, auction, or bank-owned stages of the foreclosure process. The average listing price for homes for sale in Milford, CT was \$297,100 in the month of March, 2020.

In regard to housing affordability, 1,628 renter housing units were affordable to persons with 50% or less of their Housing Affordability Median Family Income (HAMFI). For homeowners, there were only 399 housing units that were affordable to households with 50% or less HAMFI.

The monthly FMR's for FY 2015 for Milford are equal to the HUD High HOME Rents. The FMR's for the FY 2020 were higher than the High HOME rent values for efficiency apartments, one (1) bedroom apartments, two (2) bedroom apartments, three (3) bedroom apartments, and four (4) bedroom apartments.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2015	% Change
Median Home Value	346,000	300,400	(13%)
Median Contract Rent	1,075	1,207	12%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	780	16.1%
\$500-999	1,022	21.1%
\$1,000-1,499	1,800	37.2%

Rent Paid	Number	%
\$1,500-1,999	929	19.2%
\$2,000 or more	309	6.4%
Total	4,840	100.0%

Table 30 - Rent Paid

Data Source:

2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	615	No Data
50% HAMFI	1,013	399
80% HAMFI	2,287	2,096
100% HAMFI	No Data	3,896
Total	3,915	6,391

Table 31 – Housing Affordability

Data Source:

2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$958	\$1,011	\$1,249	\$1,581	\$1,762
High HOME Rent	\$958	\$1,011	\$1,249	\$1,549	\$1,708
Low HOME Rent	\$818	\$876	\$1,052	\$1,215	\$1,356

Table 32 – Monthly Rent – 2015 Rents

Data Source:

HUD FMR and HOME Rents

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$897	\$1,118	\$1,376	\$1,715	\$2,143
High HOME Rent	\$882	\$1,111	\$1,373	\$1,720	\$1,924
Low HOME Rent	\$882	\$984	\$1,181	\$1,363	\$1,521

Table 33 – Monthly Rent – 2020 Rents

Data Source:

HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Based on the HUD - CHAS data there is insufficient rental housing for residents at the lowest income levels. Because the majority of the City's population live in owner-occupied housing, there is a need to address scarce options to rent and buy small "starter" homes, particularly for those at the lowest income levels. Only 15.7% of the rental housing in the City is affordable to renters at 30% of Area Median Income. Service providers have cited a need for affordable

housing for these people at the lowest incomes, including a need for Single Room Occupancy housing.

How is affordability of housing likely to change considering changes to home values and/or rents?

The price of rental housing continues to rise in the City of Milford, along with the increase in population. Correspondingly, the amount of affordable housing will decrease as rents and sales prices increase. This could cause additional housing affordability issues.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to Zillow.com, it is estimated that the City's median rent price is \$1,900. The monthly FMRs for the Milford/Ansonia/Seymour MSA are higher than the HUD high HOME Rental Range for efficiency, one-, two-, three-, and four-bedroom units. Rental units in the City are affordable for median income earners, but there is a need for affordable housing in the City for those with the lowest incomes. There is also a need to create mixed income housing to integrate lower income families into neighborhoods with greater opportunity to find higher paying jobs.

Discussion

Rental housing values have continued to increase in the City. Rental housing is becoming less and less affordable for the lowest income households. There is little undeveloped land in the City, and there are few housing options for those that live in the City. There is a need to increase the supply of affordable, multi-unit rental housing through housing construction and housing rehabilitation.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The City of Milford contains 10,866 housing units which were built prior to 1960. This represents 51.1% of the total occupied housing units in the City. Only 1.1% of all occupied housing units were built within the last ten years. Of the 21,255 occupied housing units within the City, 7,945 (37.4%) housing units have at least one “selected condition.” In addition, 15,390 housing units (72.4%) were built before 1980, and therefore contain a potential lead-based paint hazard.

Definitions

The following definitions are used in the table below:

- **"Selected Housing Condition"** - Over-crowding (1.5 or more persons per room), lacking a complete kitchen, lack of plumbing facilities, and/or other utilities, and cost over-burden.
- **"Substandard condition"** - Does not meet code standards or contains one of the selected housing conditions.
- **"Suitable for Rehabilitation"** - The amount of work required to bring the unit up to minimum code standard, and the existing debt on the property, together are less than the fair market value of the property.
- **"Not Suitable for Rehabilitation"** - The amount of work required to bring the unit up to minimum code standard exceeds the fair market value of the property after rehabilitation work is complete.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,510	34%	2,435	50%
With two selected Conditions	0	0%	35	1%
With three selected Conditions	23	0%	30	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	10,880	66%	2,340	48%
Total	16,413	100%	4,840	100%

Table 34 - Condition of Units

Data Source

2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,285	8%	604	12%
1980-1999	2,820	17%	1,139	24%
1950-1979	7,465	45%	1,885	39%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	4,830	29%	1,210	25%
Total	16,400	99%	4,838	100%

Table 35 – Year Unit Built

Data Source:

2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	12,295	75%	3,095	64%
Housing Units build before 1980 with children present	763	5%	580	12%

Table 36 – Risk of Lead-Based Paint

Data Source

2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			1,837
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			53

Table 37 - Vacant Units – additional information forthcoming

Note: REO Properties are “Real Estate Owned by a Bank” Properties, not sold in a foreclosure auction.

Need for Owner and Rental Rehabilitation

There is a need for housing rehabilitation work in the City of Milford. The City has an active code enforcement policy and has been enforcing its codes. In addition, as an older urban environment with 51.1% of its housing units built over 60 years ago, there is a need for rehabilitation work. There is a need to incorporate environmental health into the rehabilitation work, including screenings for lead-based paint, asbestos testing, and radon gas remediation measures. However, the cost of rehabilitation exceeds the financial resources of many low- and moderate-income owner-occupied households. Therefore, many housing units will continue to deteriorate without governmental financial assistance. There is a need for more Federal funds for housing rehabilitation, as well as greater local assistance to ease the processes of permitting.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

There are approximately 12,295 (74%) owner-occupied and 3,095 (64%) renter-occupied housing units that were built prior to 1980, for a total of 15,390 (72.5%) of all occupied housing units at risk of a lead-based paint hazard.

The most recent blood lead report for the City of Milford is the Connecticut Department of Public Health Childhood Lead Poisoning Prevention and Control, 2016 Annual Disease Surveillance Report. The report, published in May 2018, reported that 6 of 749 children tested in the City of Milford have elevated levels of lead in their blood streams. The State Health Department estimates emphasize that the number of unreported/undetected cases of childhood lead poisoning is unknown, and the low number of reported cases should not be misconstrued as evidence that lead poisoning is not more widespread.

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant based rental assistance, and property acquisition – supported by the CDBG and HOME programs. The City of Milford will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

Discussion

N/A

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Milford Redevelopment & Housing Partnership owns and operates six (6) public housing communities. In those housing communities, ninety-six (96) one-bedroom units, two (2) two-bedroom units, and ten (10) efficiency units are set aside for the elderly. There is a total of 465 (330 Federal and 135 State) housing units in the public housing communities.

In addition, the Redevelopment & Housing Partnership administers 267 Housing Choice Vouchers for low-to moderate-income households for rental units in the City and surrounding region. This number is slightly higher than the number reported below, based on the most recent Housing Choice Voucher list provided by the Housing Authority in May of 2020.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	135	0	330	267	0	0	0	0	0
# of accessible units		0			0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Milford Redevelopment & Housing Partnership owns and operates six (6) public housing communities, 465 units of public housing, including two (2) communities with a total of 108 units targeted to elderly and disabled housing. The physical condition of the public housing ranges based on property, but maintenance and upgrading is needed due to the age of the units. The Redevelopment & Housing Partnership is not developing new housing.

Public Housing Condition

Public Housing Development	Average Inspection Score
Total Public Housing Development	85

Table 39 - Public Housing Condition**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

The Milford Redevelopment & Housing Partnership has 465 public housing units in the following public housing communities:

- Alan Jepson Manor - 44 Family Units
- Catherine McKeen Village (Federal) - 50 Mixed Population Units
- Catherine McKeen Village 1 (State) - 25 Mixed Population Units
- Catherine McKeen Village 2 (State) - 40 Mixed Population Units
- Foran Towers - 43 Elderly Units
- Island View Park - 110 Mixed Population Units
- DeMaio Gardens (Federal) - 65 Elderly Units
- DeMaio Gardens (State) - 30 Mixed Population Units
- Alberta Jagoe Commons - 40 Mixed Population Units
- Scattered Sites - 18 Family Units

The physical condition of the public housing is good but maintenance and upgrading is needed due to the age of the units. More units will be made accessible to physically handicapped tenants upon request. The housing authority does comply with the 5% requirement for accessibility.

In addition, the Redevelopment & Housing Partnership's FY 2020-2024 Five Year Plan for the Capital Fund Grant Program indicated the following as needed capital improvements in the public housing developments: upgrades to

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Redevelopment & Housing Partnership owns and manages all properties in its Low-Income Public Housing portfolio. The Partnership does not run services, however. The Partnership chooses to let local social service providers coordinate training opportunities, job placement and other services. The Partnership instead focuses on providing stellar housing options for its residents.

Discussion:

The Redevelopment & Housing Partnership manages 330 Federal and 135 State public housing units.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

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. It is Beth-El's mission to extend dignity and respect to all individuals and families while connecting them to housing, food, and services within their communities. It is Beth-El's Vision to create a community where everyone is home and all are fed.

The following table lists the existing facility for the homeless in the City of Milford. Beth-El is the only organization with facilities serving people experiencing homelessness in the City.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New
Households with Adult(s) and Child(ren)	6	25	0	2
Households with Only Adults	17	25	0	3
Chronically Homeless Households	All Potentially Chronic	All Potentially Chronic	0	5 Households (9 total)
Veterans	6	25	0	0
Unaccompanied Youth	0	0	0	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are several mainstream services available to people experiencing homelessness in the City of Milford, including but not limited to, the following:

- Mental Health – is provided through Alliance for Prevention and Wellness and Bridges Healthcare
- Social Service – is provided by the City of Milford Department of Health and Human Services
- Employment – is provided by Career Resources
- Educational – is provided by the Literacy Center of Milford, Inc
- Shelter – is provided by Beth-El Center

Beth-El works with the Greater New Haven CAN, the City of Milford, and the Connecticut Coalition to End Homelessness to establish goals and performance measures. Coordinated entry has been effective in directing people who are homeless or people at-risk of becoming homeless to mainstream services that can assist them. It is difficult for homeless individuals to use mainstream services when they do not have proper identification, which is a frequent problem for these individuals.

According to the Greater New Haven CAN 2019 Point-in-Time Count, there were 61 sheltered homeless adults with mental health issues, and 5 unsheltered adults. Additionally, there were 22 sheltered adults with substance abuse issues, and 2 unsheltered adults. The Greater New Haven CAN uses this data to target interventions to these populations. However, there is always a greater need for these services than there are providers.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Families with children – Families with children need rent and utility assistance to prevent homelessness in emergency situations, and there is also a need for transportation and car repair, as well as childcare in evening hours for working parents. Families are encouraged to go through the diversion process by contacting 211, where they will go through many layers of services that are aimed at addressing underlying needs. If those do not work, then families will go through a lengthy admission process with factfinding, establishing goals, and timelines.

Beth-El Center offers shelter to families, as well as diversion services. There were 383 families in 2019, and 391 families in the Greater New Haven CAN in 2020.

Veterans and their families – The State of Connecticut has prioritized working with homeless veterans. The State of Connecticut and the Greater New Haven CAN have brought the number of chronically homeless veterans to functional 0. The progress made on assisting homeless veterans has been due to partnerships with the VA and the prioritization of Supportive Services for Veterans Families (SSVF) funding to serve about 900 veterans statewide with 140 beds, as well as a number of effective outreach efforts and a by-name list of veterans seeking care. Additionally, HPRP provides employment assistance for veterans at-risk of becoming homeless. Beth-El offers housing services to veterans. There were 22 veterans in emergency shelters counted in the 2020 Point In Time Count for the Greater New Haven CAN.

Unaccompanied youth – Teens aging out of foster care, and young adults in the 18-24 transition stage can be hard to locate. Specific needs of those in a doubled-up situation, who may be “couch-surfing”, are conflict resolution, mediation, and employment assistance to prevent imminent homelessness without income. Children aging out of foster care are protected by laws to ensure that youth are not discharged into homelessness. Homeless youth will not always identify themselves as homeless, creating difficulties in accurately counting the number of youth that are homeless. The Youth Continuum in New Haven attempts to bring together stakeholders to focus on providing housing solutions for homeless youth. There is also a need to target interventions to LGBTQIA+ homeless youth and to provide trauma-informed care, as unaccompanied youth who are homeless are frequently victims of domestic abuse. Youth Continuum offers permanent supportive housing services to unaccompanied youth. There were 2 unaccompanied youth counted in the 2020 Point-in-Time Count.

Beth-El provides day shelters and overnight shelters during cold weather events to residents of the City. Approximately 48.4% of Beth-El’s funding comes from government related contracts. Through this shelter, homeless individuals and families can connect to mainstream services provided by various social services and the Health Department.

Additional services for subpopulations including individuals with special needs and individuals with HIV/AIDS are discussed in Sections MA-35 Special Needs Facilities and Services, and SP-40 Institutional Delivery Structure.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The City of Milford has identified the priorities for services and facilities for its special needs population. This includes the elderly, frail elderly, persons with disabilities, persons who identify as LGBTQIA+, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, persons exiting incarceration, and public housing residents.

including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The following needs and objectives are established under this Five Year Consolidated Plan:

- **Elderly Persons** – Accessible housing units plus supportive services, for example, transportation to health services and recreation opportunities.
- **Frail Elderly** – Accessible housing units plus supportive services, for example, transportation to health services and recreation opportunities.
- **Persons who identify as LGBTQIA+** - affordable rental housing, affordable targeted healthcare, job training and job opportunities.
- **Persons with Disabilities** - rehabilitation of existing housing units for accessible improvements, reasonable accommodations to rental housing units, and supportive employment opportunities.
- **Alcohol and Other Drug Addictions** - supportive services to end addictions, housing, and training to re-enter the work force.
- **Public Housing Residents** - financial sufficiency, job training and job opportunities, and assistance in finding affordable housing.
- **Persons Exiting Incarceration** - affordable rental housing, trauma-informed caseworkers, job training and job opportunities.
- **Victims of Domestic Violence** - additional temporary shelters, supportive services, training programs, and permanent supportive housing options.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Greater New Haven CAN works with mental and physical health institutions to discharge patients into supportive housing. The CAN works with the healthcare institution to manage frequent healthcare users who are also homeless. Many of these individuals are chronically homeless. For other users, the Greater New Haven CAN utilizes diversion methods to help former patients find housing before entering the shelter system.

The City of Milford’s Department of Health and Department of Human/Youth & Family Services together provide physical and mental health programs to its City residents. According to the 2017-2018 Milford Health Department’s Annual Report, municipal intervention takes on two roles when dealing with troubled housing; enforcement by health officials and animal control and support by human and mental health services, i.e. Elderly Protective Services, the Department of Children and Families, Milford Human Services and the Probate court.

In 2018, the Milford Health Department planned on applying within the next two years for accreditation through the national Public Health Accreditation Board (PHAB). Voluntary national public health accreditation would enable the Department to improve the quality of its services and better meet the needs of the community. The application would require address the following priority areas: access to care, healthy lifestyles and mental health and substance abuse. For each priority area there are work groups, goals and strategies that the Milford Health Department works with the Partnership of Greater New Haven to complete. As of this Consolidated Plan, the application process is still underway.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Milford’s FY 2020-2024 Five Year Consolidated Plan proposes the following goals/strategies for “Other Special Needs Priority”:

Other Special Needs Strategy -

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.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Milford has developed the following priorities during the FY 2020-2024 Five Year Consolidated Plan period:

- Funding for the Boys & Girls club after school program.
- Funding for a scholarship to enroll in an employment training job skill based class and/or employer job training
- Funding for a senior transportation driver.
- Funding for rent and mortgage assistance.
- Funding for staff to provide counseling and other services for sexual assault victims.
- Funding for tenant/landlord counseling and engagement.
- Funding for security deposit program.
- Funding for ADA curb cuts and sidewalks.
- Funding for an ADA accessible trail in Beaver Brook.
- Funding for a Micro Enterprise program.
- Funding for Public Housing is allocated regularly or as requested by MRHP.
- Funding for single family housing repair program.
- Funding for multi-family housing improvements, rental, and landlord engagement workshops.
- Funding for Down payment/Closing Cost Assistance.

MA-40 Barriers to Affordable Housing – 91.210(e)**Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The following factors contribute to forming barriers to Affordable Housing:

- The cost to purchase a single-family home in Milford is approximately \$310,000.
- The average monthly rent for a 1 or 2 bedroom apartment in Milford is \$900 per month.
- There is a lack of open developable land to build new housing in the City.
- The cost of construction and rehabilitation work is expensive and lower-income households do not have the financial resources to pay for this work.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The goal of the City of Milford's economic development policy is to foster economic growth in the community, improve the local economy, promote job opportunities, and increase the local tax base.

Economic

Developmen

t Market

Analysis

Business

Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %
Agriculture, Mining, Oil & Gas Extraction	27	33	0	
Arts, Entertainment, Accommodations	2,227	3,247	10	
Construction	831	970	4	
Education and Health Care Services	5,350	3,769	23	
Finance, Insurance, and Real Estate	1,897	2,147	8	
Information	564	327	2	
Manufacturing	2,803	3,358	12	
Other Services	922	1,331	4	
Professional, Scientific, Management Services	2,206	2,175	10	
Public Administration	0	0	0	
Retail Trade	2,873	5,993	13	
Transportation and Warehousing	619	325	3	
Wholesale Trade	1,152	1,578	5	
Total	21,471	25,253	--	

Table 41 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	30,324
Civilian Employed Population 16 years and over	28,120
Unemployment Rate	7.26
Unemployment Rate for Ages 16-24	19.86
Unemployment Rate for Ages 25-65	5.37

Table 42 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	8,140
Farming, fisheries and forestry occupations	1,260
Service	2,115
Sales and office	7,295
Construction, extraction, maintenance and repair	1,940
Production, transportation and material moving	1,249

Table 43 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	17,485	67%
30-59 Minutes	5,600	21%
60 or More Minutes	3,030	12%
Total	26,115	100%

Table 44 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	560	70	439
High school graduate (includes equivalency)	5,350	454	1,860
Some college or Associate's degree	6,670	724	1,040
Bachelor's degree or higher	11,320	390	1,660

Table 45 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	10	40	30	309	373
9th to 12th grade, no diploma	385	139	150	404	853
High school graduate, GED, or alternative	894	1,070	1,549	5,050	3,865
Some college, no degree	1,359	1,169	1,124	3,435	1,150
Associate's degree	130	434	610	1,655	549
Bachelor's degree	734	1,935	2,055	3,835	1,040
Graduate or professional degree	34	1,485	1,505	2,555	1,180

Table 46 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	50,091
High school graduate (includes equivalency)	80,643
Some college or Associate's degree	88,397
Bachelor's degree	119,515
Graduate or professional degree	133,273

Table 47 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The three (3) largest categories of jobs in business by sector in the City of Milford is as follows:

- Retail Trade 5,993 jobs
- Education and Health Care Services 3,769 jobs
- Manufacturing 3,358 jobs
- Total is 13,120 jobs**

Note: The ACS data for 2011-2015 said there were 25,253 jobs in the City.

These three categories represent 52.0% of the total number of jobs in the City. The remaining 48% are distributed in smaller amounts among ten other categories.

Describe the workforce and infrastructure needs of the business community:

The City of Milford realizes that there is a need to increase employment, self-sufficiency, educational training, and empowerment of its residents. The City's Economic Development Needs include:

- Support and promote new job creation, job retention, workforce development, employment, and job training.
- Support business and commercial growth through expansion and new development.
- Redevelop the major business hubs in the City.
- Support employment training and entrepreneurship for minority and women-owned businesses.
- Planning and promotion of the development and redevelopment of vacant commercial and industrial sites.
- Promote the development of open space, parking, landscaping, roads, walks, trails, and other forms of infrastructure to support economic growth and development.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City of Milford's Department of Economic and Community Development has partnered with Connecticut's Small Business Development Center (CTSBDC) to offer a Micro-Enterprise Assistance Program (MEAP). The program, funded through the U.S Department of Housing and Urban Development (HUD) is intended to provide small businesses with the tools for expansion and growth in order to create and sustain viable and productive small businesses in Milford.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to the 2011-2015 American Community Survey data, the City of Milford had an unemployment rate of 7.3%. 2014-2018 ACS data shows the City of Milford has an unemployment rate of 5.2% which is lower than the Connecticut unemployment rate of 6.5% and the U.S rate of 5.9%. According to the 20115-2015 ACS Data, Milford had 25,253 available jobs and 21,471 workers, suggesting that the unemployment that exists is Structural Unemployment, caused by a mismatch of skills and available jobs. The employment rate is also larger in the 16-24 age group at 19.86% as opposed to older age groups. This suggests

that as younger members of the workforce develop skills and experience, and they are more able to find employment.

According to the 2011-2015 American Community Survey data, there are job deficiencies (the number of qualified workers exceeds the number of jobs available) in the following sectors:

- Agriculture, Mining, Oil and Gas Extraction – 54.1% of sector workforce is not utilized
- Manufacturing – 7.0% of sector workforce is not utilized
- Transportation and Warehousing – 15.9% of sector workforce is not utilized

The City of Milford is also experiencing employment deficiencies (the number of jobs available exceeds the number of qualified workers) in the following sectors:

- Agriculture, Mining, Oil & Gas Extraction – 18.1% of the available jobs are not filled
- Arts, Entertainment, Accommodations – 31.4% of the available jobs are not filled
- Construction – 14.3% of the available jobs are not filled
- Finance, Insurance, and Real Estate – 11.6% of the available jobs are not filled
- Other Services – 30.7% of the available jobs are not filled
- Retail Trade – 52.1% of the available jobs are not filled
- Wholesale Trade – 27.0% of the available jobs are not filled

Describe any current workforce training initiatives, including those supported by workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Current workforce development efforts in the City of Milford are coordinated by Milford Employment and Training. Milford Employment and Training has been in existence for over 25 years and its primary training program is for Certified Nursing Assistants. Milford Employment and Training services include job search assistance, resumes, and work experience for youth.

Milford Employment and training functions as a source of information about local, state and Federal social service programs and services throughout the area. Staff disseminated information and direct referrals are made whenever it is appropriate.

Milford Employment and Training works directly with Human Services Development and Youth and Family Services Agency, the Department of Social Services and the Department of Labor in Bridgeport, New Haven and Derby.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes, the South Central Connecticut 2018-2023 CEDS, maintained by REX Development.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Milford is a member of an Economic Development District headed by REX Development. REX Development maintains the South Central Connecticut 2018-2023 Comprehensive Economic Development Strategy (CEDS) for the Towns of Bethany, Branford, East Haven, Guilford, Hamden, Madison, Meriden, Milford, New Haven, North Branford, North Haven, Orange, Wallingford, West Haven and Woodbridge. The evaluation measurements include:

- Increase the number of new businesses by 2% annually (ctdata.org)
- Reduce regional unemployment to not exceed the national unemployment rate
- Increase rail and bus use by 5% annually
- Dredge the Port of New Haven to 42 feet by 2020
- Increase median household income by 2% annually
- Decrease number of people living below the poverty level by 1% annually
- Increase enplanements at Tweed New Haven Regional Airport by 5% annually
- Increase number of airline carriers to 3 by 2020
- Increase the utilization of state and local parks in the region by 5% annually
- Maximize the assessment and remediation of brownfields based on State and Federal funding
- Increase the REX/EDC/VNH newsletter subscription list by 2% annually
- Increase website visits to REX, VNH and Greater New Haven section on ctvisit.com by 5% annually
- Increase housing starts by 2% annually
- Increase affordable housing units by 5% annually
- Preserve number of farms/open space by 5 sites per year
- Increase number of trade shows by 2 events per year
- Increase amount of venture capital investment by 5%
- Increase number of technical skills training programs by 2% annually

Discussion

The local economy in the City of Milford appears to be stable. According to the 2014-2018 ACS data, the City of Milford has an unemployment rate of 5.2% which is lower than the Connecticut unemployment rate of 6.5% and the U.S rate of 5.9%.

MA-50 Needs and Market Analysis Discussion

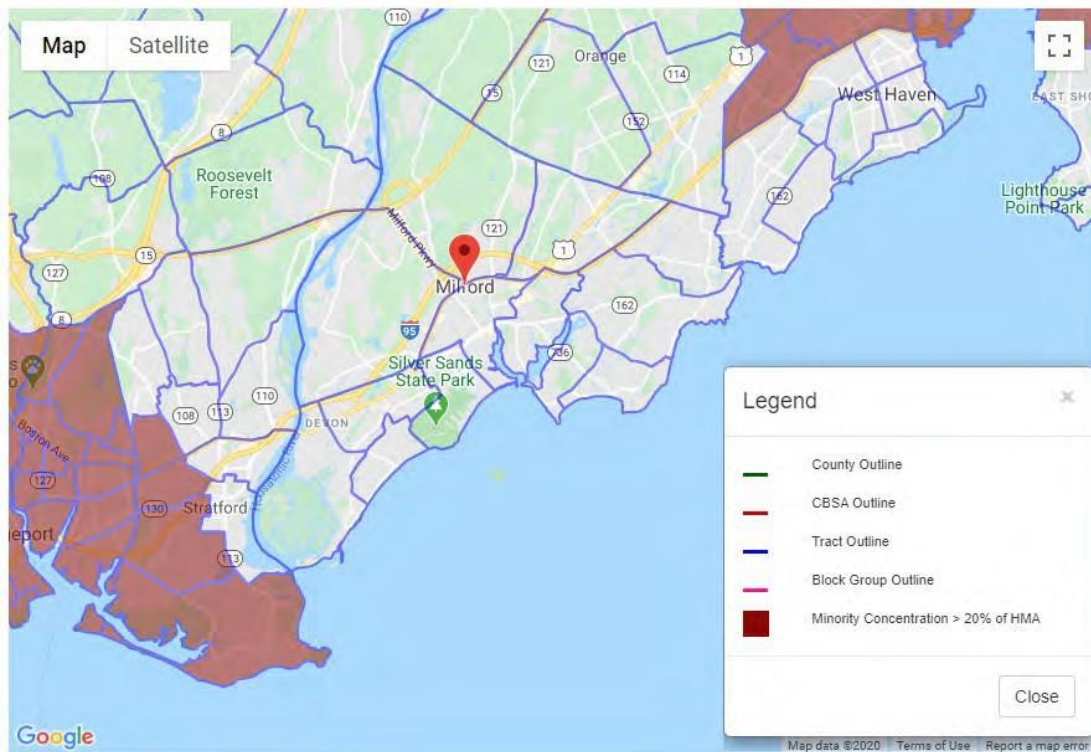
Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

According to stakeholder interviews, housing problems are generally concentrated in the Southern portion of the City of Milford. These areas of concentration tend to have high numbers of low- and moderate-income residents. Census Tracts and Block Groups with a concentration of 51% or more of the population as being below median income includes the following:

C.T. 1501, B.G. 1; C.T. 1502, B.G. 1; C.T. 1503, B.G. 2; C.T. 1503, B.G. 4; C.T. 1504, B.G. 1; C.T. 1504, B.G. 2; C.T. 1504, B.G. 3; C.T. 1505, B.G. 2; C.T. 1506, B.G. 2; C.T. 1508, B.G. 2; C.T. 1510, B.G. 2.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

HUD defines an area of minority concentration as a Block Group that has 20% higher minority population than the minority population in a housing market, or a minority population greater than 50%, based on whichever is lower. Because the City of Milford's minority population is 12.3%, the 20% threshold is used. There are no areas of minority concentration, according to HUD's RAD Minority Concentration Analysis tool.



Source: <https://www.huduser.gov/portal/maps/rad/home.html>

What are the characteristics of the market in these areas/neighborhoods?

On February 14, 2019, HUD issued notice CPD 19-02, “Low- and Moderate-Income Summary Data Updates” which announced the publication of updated low- and moderate-income summary data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). The LMISD replaces the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS). The LMISD is used for the purpose of identifying areas that are eligible under the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis (“Area Benefit” or LMA). The City of Milford has an overall low- and moderate-income percentage of 35.37%.

The following Census Tracts and Block Groups qualify as low- and moderate-income: C.T. 1501, B.G. 1; C.T. 1502, B.G. 1; C.T. 1503, B.G. 2; C.T. 1503, B.G. 4; C.T. 1504, B.G. 1; C.T. 1504, B.G. 2; C.T. 1504, B.G. 3; C.T. 1505, B.G. 2; C.T. 1506, B.G. 2; C.T. 1508, B.G. 2; C.T. 1510, B.G. 2.

Are there any community assets in these areas/neighborhoods?

The Boys and Girls Club of Milford is located in C.T. 1504, B.G. 3.

Are there other strategic opportunities in any of these areas?

The City allocates its CDBG funds to primarily benefit low- and moderate-income persons. The Public Facilities and Infrastructure Improvement activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele. The Housing, Public Service, Homeless, Other Special Needs, and Job Creation activities have an income eligibility criterion; therefore, the income requirement restricts funds only to low- and moderate-income households throughout the City.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households – 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Residents in the City of Milford are extensively covered by companies such as Frontier (97% coverage), Viasat (99% coverage), and Hughesnet (100% coverage). Viasat and HughesNet offer download speeds of up to 25Mbps, whereas Frontier provides download speeds up to 150 Mbps. The companies offer cable, DSL, and fiber internet access. However, fiber only reaches 2% of homes, while cable and DSL cover nearly all homes.

According to FY 2014-2018 ACS data, 777 of 1,789 (43.4%) households earning less than \$20,000 do not have an internet subscription, and 1,353 of 7,406 (18.3%) households earning between \$20,000 and \$74,999 do not have an internet subscription.

Internet access is an important tool in bridging the economic and digital divide. Given Milford's proximity to dozens of universities, as well as technology centers such as Boston and New York, fields requiring computer literacy are numerous and seek out more workers each year.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

As mentioned, Frontier, Viasat, and Hughesnet all have infrastructure in the City. According to highspeedinternet.com, Viasat is widely available, Frontier does not offer contract plans, and HughesNet is perfect for rural areas. Broadband internet (internet faster than 25 Mbps) is available in 100% of Milford.

MA-65 Hazard Mitigation – 91.210(a)(5), 91.310(a)(3)**Describe the jurisdiction’s increased natural hazard risks associated with climate change.**

The City of Milford is a coastal community that is also surrounded and intersected by water bodies. As a result, the City’s Hazard Mitigation Plan identifies flooding as the City’s primary natural hazard. Flood zones cover about one-third of the city. In general, the potential for flooding is widespread across Milford, with the majority of major flooding occurring along established flood zones. Hurricanes and coastal storms have caused severe coastal flooding as well as flooding along the Wepawaug River. Indirect flooding that occurs outside floodplains and localized nuisance flooding along tributaries are also common problems in the City.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Due to the presence of the Wepawaug River and the coastline, a large portion of City land is in the flood zone. Census Tract 150800 Block Group 2 and Census Tract 150100 Block Group 1 are located along the Wepawaug River. The other Low/Mod Block Groups, C.T. 150100, B.G. 1; C.T. 150200, B.G. 1; C.T. 150300, B.G. 2; C.T. 150300, B.G. 4; C.T. 150400, B.G. 1; C.T. 150400, B.G. 2; C.T. 150400, B.G. 3; C.T. 150500, B.G. 2; and C.T. 150600, B.G. 2; C.T. are located along or in proximity to the coast.

The City has adopted the National Flood Insurance Program’s (NFIP) “Community Rating System” (CRS). CRS is a program that rewards community efforts exceed minimum flood protection standards. A good community class rating can lower flood insurance premium rates as a discount to reward the community’s actions. As of November of 2014 the City of Milford has earned a class of 9, which gives all flood insurance policy holders an automatic 5% deduction on their premiums. The City is actively taking measures to improve its class rating.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Milford, Connecticut is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In compliance with the HUD regulations, the City of Milford has prepared this FY 2020-2024 Five-Year Consolidated Plan for the period of October 1, 2020 through September 30, 2025. This consolidated plan is a strategic plan for the implementation of the City's Federal Programs for housing, community, and economic development within the City of Milford.

The Five-Year Consolidated Plan establishes the City's goals for the next five (5) year period and outlines the specific initiatives the City will undertake to address its needs and objectives by promoting: the rehabilitation and construction of decent, safe, sanitary and affordable housing, creating a suitable living environment; removing slums and blighting conditions; promoting fair housing; improving public services; expanding economic opportunities; and principally benefitting low- and moderate-income residents.

This Five-Year Consolidated Plan is a collaborative effort of the City of Milford, the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through a series of public meetings, stakeholder interviews, resident surveys, statistical data, and review of other community plans.

The "Vision" for this 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 strategies have been identified for the five-year period of FY 2020 through FY 2024.

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, 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 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 (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 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 (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 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 (Priority/ Level 2)

Priority Needs: There is a need to improve public and private property, neighborhood facilities and infrastructure, and 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 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 (Priority/Level 3)

Priority Need: There is a need for 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: To continue sound program administration practices, provide City support, when necessary, to facilitate and execute public facility and infrastructure improvements using 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.

- **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.

SP-10 Geographic Priorities – 91.215 (a)(1)**Geographic Area**

1	Area Name:	Citywide
	Area Type:	Local Target area
	Other Target Area Description:	N/A
	HUD Approval Date:	N/A
	% of Low/ Mod:	35.37%
	Revital Type:	Other
	Other Revital Description:	Low and Moderate Income Qualifying Areas throughout the City of Milford
	Identify the neighborhood boundaries for this target area.	The entire City limits.
	Include specific housing and commercial characteristics of this target area.	The majority of the housing stock in the City is owner-occupied housing.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Milford is an Exception Grantee so the number and location of low- and moderate-income census tracts and block groups varies, preventing Milford from designating a geographical target area.
	Identify the needs in this target area.	There is a need for affordable rental housing, economic development, workforce development, and social services in the area that serve youth, the elderly, the disabled, and those with substance abuse issues.
	What are the opportunities for improvement in this target area?	Many of the neighborhoods of the City of Milford are dense and walkable. Neighborhoods retain strong character and local leaders organize to benefit their communities.
	Are there barriers to improvement in this target area?	

Table 48 - Geographic Priority Areas

General Allocation Priorities**Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)**

The City of Milford allocates its CDBG funds to projects and activities that principally benefits low- to moderate-income persons. Low- and moderate-income benefits are calculated based on low/mod area benefit, low/mod clientele, low/mod presumed benefit, low/mod income housing, and low/mod job creation benefit.

The City has identified the need to fund social service programs for youth services, homeless programs, the elderly, and other special needs populations. These are income based services.

With the City's limited CDBG funds, the City will identify one or two public facility improvement projects each year. These projects will be located in areas with a high concentration of low- and moderate-income persons.

SP-25 Priority Needs - 91.215(a)(2)**Priority Needs**

1	Priority Need Name	Housing Strategy
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	HSS-1 Preserve Existing Housing Stock HSS-2 Housing Service Program(s) HSS-4 Housing Education HSS-5 Homeownership

	Description	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.
	Basis for Relative Priority	Over 37.8% of households are cost overburdened by at least 30%. More than 47.4% of housing units were constructed prior to 1960.
2	Priority Need Name	Homeless Strategy
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide

	Associated Goals	HMS-1 Operational Support HMS-2 Housing HMS-3 Landlord Engagement
	Description	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.
	Basis for Relative Priority	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.
3	Priority Need Name	Other Special Needs Strategy
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development

	Geographic Areas Affected	Citywide
	Associated Goals	SNS-1 Other Special Needs
	Description	There is a growing need for affordable housing and facilities that benefit seniors, persons with disabilities, victims of domestic violence, persons with alcohol/drug dependency, person with development disabilities and persons with other special needs.
	Basis for Relative Priority	These priorities were developed using statistical data, special needs specific consultation, and resident input.
4	Priority Need Name	Community Development Strategy
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development

	Geographic Areas Affected	Citywide
	Associated Goals	CDS-1 Infrastructure CDS-2 Community Facilities CDS-3 Accessibility Improvements CDS-4 Public Services
	Description	There is a need to improve the public and private property, neighborhood facilities and infrastructure, and expand public transportation services to improve the quality of life for of low- and moderate-income households.
	Basis for Relative Priority	These needs were developed using statistical data, consultations, and resident participation.
	Priority Need Name	Economic Development Strategy
5	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions

		Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	EDS-1 Economic Development EDS-2 Employment EDS-3 Financial Assistance
	Description	There is a need for employment opportunity, job skill training, small business development assistance and improvements to commercial property.
	Basis for Relative Priority	These needs were developed using statistical data, consultations, and resident participation.
	Priority Need Name	Administration, Planning, and Management Strategy
6	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities

		Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	AMS-1 Overall Coordination
	Description	To continue sound program administration practices, provide City support, when necessary, to facilitate and execute public facility and infrastructure improvements using Federal, State and local funded programs.
	Basis for Relative Priority	The City will fund every year.

Table 49 – Priority Needs Summary**Narrative (Optional)**

Not Applicable

SP-30 Influence of Market Conditions – 91.215 (b)**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City of Milford does not provide Tenant Based Rental Assistance.
TBRA for Non-Homeless Special Needs	The City of Milford does not provide Tenant Based Rental Assistance however the Connecticut Department of Social Services does provide rental assistance.
New Unit Production	Land acquisition is expensive in the City of Milford, making the construction of new units difficult. The City of Milford supports the development of new mixed-income housing and new housing for the elderly and special needs population. Open land for new development is limited.
Rehabilitation	There is a high demand in the City of Milford to provide rehabilitation assistance. The City needs affordable, accessible, decent, safe, and sanitary housing that could be accomplished through rehabilitation.
Acquisition, including preservation	The cost to acquire property is expensive, especially when relocation benefits are required. There are approximately 20 buildings in the City of Milford considered historic. The City has developed guidelines for historic preservation that can be found in the City's Historic Preservation Commission.

Table 50 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Milford will receive \$515,464 in CDBG funds for FY 2020 Program Year. The City expects to receive \$10,000 in Program Income during the FY 2020 Annual Action Plan period. The City's FY 2020 CDBG program year starts on October 1, 2020 and concludes on September 30, 2021.

The following financial resources are identified for the FY 2020 Annual Action Plan and will be used to address the following needs: Housing Needs; Homeless Needs; Other Special Needs; Community Development Needs; Economic Development Needs; and Administration, Planning, and Management Needs. The accomplishments of these projects/activities will be reported in the FY 2020 Consolidated Annual Performance & Evaluation Report (CAPER).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$515,464	\$10,000	-	\$525,464	\$2,061,856	Five years of funding at the FY 2020 funding level.

Table 51 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In addition to the entitlement funds, the City of Milford anticipates the following federal resources may be available to local non-profit agencies and organizations to undertake the strategies identified in the Five-Year Consolidated Plan:

- Federal PILOT Grant
- Education Cost Sharing
- State Realty
- State Realty – Pequot

- Veterans Grant
- Telephone Access Line Grant
- Misc. State-Mun. Stabilization
- School Health Fund

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Milford protects and expands public use of its City owned land for open space and recreational purposes and has established an Emergency Preparedness plan and Hazard Mitigation Plan to protect its residents and public/private land.

Discussion

The City does not have any publicly owned land or property within its jurisdiction that could be used to develop new affordable housing.

Milford generously provides local service agencies and senior center with office space in public buildings at the cost of \$1 for a non-profit organization. By alleviating overhead cost the organization can better meet its endeavors in the community and in turn, address assist the City to meet the goals identified in the Consolidated Strategic Plan.

As will many CT Towns, residents bear the burden of taxes that support local and State expenses. It is the task of many towns in Connecticut to seek annual outside resources to supplement the budget and needs in the community. CDBG funds leverage this initiative and lift the local funding burden. Recently, Milford has faced the challenge that many CT City's experience regularly, an increase of individuals suffering from housing instability and homelessness. Addressing the issue of permanently housing homeless individuals, veterans among them, and families, in an area that has a shortage of affordable housing choices will be an opportunity to show its humanity.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Milford	Departments and agencies	Planning	Jurisdiction
Redevelopment & Housing Partnership	PHA	Public Housing	Jurisdiction
Connecticut Coalition to End Homelessness	Continuum of Care	Homelessness	Region

Table 52 - Institutional Delivery Structure**Assess of Strengths and Gaps in the Institutional Delivery System**

The City of Milford, through its Economic & Community Development Department, as well as other departments, coordinates and consults with the County of New Haven, to address its housing and community development priorities. The City also consults with the local non-profits and social service providers, as well as the Redevelopment and Housing Partnership.

The largest gap in the institutional delivery system is the lack of funds available for housing programs and supportive services. The coordination and cooperation is in place, but unfortunately the Federal and State financial resources are limited.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	X

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 53 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The following services are targeted to the homeless:

- Beth-El Center offers emergency shelter, case management services, referral services, crisis intervention, a soup kitchen, as well as an Emergency “No Freeze” Shelter program, mandated by the State if the temperature is at or below 32 degrees F, which operates from November to March.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Homeless service providers such as the Connecticut Coalition to End Homelessness and Beth-El Center have encountered instances where the Department of Corrections and the local non-profit hospitals have called the 211 intake line for the shelters. However, there are not enough beds to take all individuals, so in keeping with the Connecticut Balance of State’s policy, everyone seeking shelter will first encounter diversionary counseling in the event that other services can help.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City will annually perform an analysis to determine the unmet housing, homeless, other special needs, community development, and economic strategies for the community.

SP-45 Goals Summary – 91.215(a)(4)**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HSS-1 Preserve Existing Housing Stock	2020	2024	Affordable Housing	Citywide	Housing Strategy	CDBG: \$134,000	Rental units rehabilitated: 100 Household Housing Unit Homeowner Housing Rehabilitated: 30 Household Housing Unit
2	HSS-2 Housing Service Program(s)	2020	2024	Affordable Housing	Citywide	Housing Strategy	CDBG: \$20,500	Public service activities for Low/Moderate Income Housing Benefit: 125 Households Assisted
3	HSS-4 Housing Education	2020	2024	Affordable Housing	Citywide	Housing Strategy	CDBG: \$2,000	Homeless Prevention: 100 Persons Assisted
4	HSS-5 Homeownership	2020	2024	Affordable Housing	Citywide	Housing Strategy	CDBG: \$15,000	-
5	HMS-1, 3 Homeless Strategy	2020	2024	Homeless	Citywide	Homeless Strategy	CDBG: \$31,000	Homeless Person Overnight Shelter: 850 Persons assisted
	Control No: 2506-0117 (exp. 07/31/2020)							109 Public service activities other than Low/Moderate Income Housing Benefit: 3,500 Persons assisted

6	SNS-1 Other Special Needs	202 0	202 4	Non- Homeless Special Needs	Citywide	Other Special Needs Strategy	CDBG: \$5,000	Public Facility or Infrastructure Activities other than Low/Moderat e Income Housing Benefit: 30,900 Persons assisted Other: 1
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7	CDS-1,2,3,4,5 Community Development Improvements	2020	2024	Non- Housing Community Developme nt	Citywid e	Community Developme nt Strategy	CDBG: \$116,052	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 81,870 Persons assisted
8	CDS-4 Public Service s	2020	2024	Non- Housing Community Developme nt	Citywid e	Community Developme nt Strategy	CDBG : \$10,500	Public service activities other than Low/Moderate Income Housing Benefit: 3,325 Persons assisted
9	EDS-1 Economic Developme nt	2020	2024	Non- Housing Community Developme nt Economic Developmen t	Citywid e	Economic Developme nt	CDBG : \$30,000	Public service activities other than Low/Moderate Income Housing Benefit: 25-50 Persons assisted
10	AMS-1 Overall Coordinati on	2020	2024	Administratio n	Citywid e	Administration and Planning Strategy	CDBG: \$103,093	Oth er: 1 Oth er

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	HSS-1 Preserve Existing Housing Stock
	Goal Description	<p>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.</p>

2	Goal Name	HSS-2 Housing Service Program(s)
	Goal Description	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.
4	Goal Name	HSS-4 Housing Education
	Goal Description	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.
5	Goal Name	HSS-5 Homeownership
	Goal Description	Assist eligible first-time buyers who wish to own a home by providing down payment assistance, closing cost assistance and HUD Housing Counseling.
6	Goal Name	HMS-1, 3 Homeless Strategy
	Goal Description	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. Increase supply of rental property owners through existing service providers to support Federal and State Rapid Re-Housing efforts.

7	Goal Name	SNS-1 Other Special Needs
	Goal Description	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.
8	Goal Name	CDS-1,2,3,4,5 Community Development Improvements
	Goal Description	Eliminate architectural barriers make public facilities, existing commercial buildings and new housing and commercial construction inaccessible to disabled and persons with special needs. Promote accessible, safe conditions through rehabilitation of public infrastructure such as sidewalks and zoning laws that require accessibility features at the time of construction.
9	Goal Name	CDS-4 Public Services
	Goal Description	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.
10	Goal Name	EDS-1,2,3 Economic Development
	Goal Description	Encourage commercial property improvement, development and expansion of City commercial corridors and transit- oriented routes through special economic financial assistance. Support and encourage job creation, job retention, workforce job training by employers and to unemployed and underemployed persons, including summer youth programs. Support micro-enterprise business assistance program.
11	Goal Name	AMS-1 Overall Coordination
	Goal Description	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.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Due to limited CDBG funds, the City is not proposing any of its CDBG funds to provide affordable housing. The City will work to preserve existing housing stock through residential repairs and modification to owner-occupied, non-owner occupied, and first time homebuyers.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)****Activities to Increase Resident Involvements**

The Milford Redevelopment & Housing Partnership currently follows and will continue to follow all federal regulations regarding community service requirements for public housing.

However, due to the Housing Partnership's limited budget, social services are outsourced to non-profit organizations within the area.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)**Barriers to Affordable Housing**

The City of Milford in its most recent 2011 Analysis of Impediments to Fair Housing did not identify any negative effects of its public policies that serve as barriers to affordable housing. The City has continued to revise and update its Zoning Ordinance. This document is consistent with the Fair Housing Act, Section 504, and the American with Disabilities Act. There are not other policies that restrict fair housing.

The City of Milford is committed to removing or reducing barriers to the development of affordable housing whenever possible throughout the City. A variety of actions include, among others, to reduce the cost of housing to make it affordable.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Fair housing is essential to ensuring that persons with lawful sources of income, or are of a different race, color, religion, sex, disability, familial status, and national origin have equal access to safe, decent, sound, and affordable housing in the City of Milford. 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.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Five-Year Consolidated Plan serves as a consolidated planning document, an application, and a strategic plan for the City of Milford, CT. The following goals and strategies for the City of Milford's Homeless Needs have been identified for the five-year period of FY 2020 through FY 2024.

Homeless Strategy –

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 services: including financial assistance, housing search assistance, and targeted services which have 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-2 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.

The Greater New Haven Coordinated Access Network and Beth-El assist populations that are at-risk of homelessness. Persons and families at-risk of becoming homeless are directed toward the 2-1-1 housing crisis phone line and encouraged to seek diversion assistance. Diversion assistance is the primary strategy to address those at imminent risk, and households are encouraged to visit the Diversion Center. If the Diversion Center cannot divert the household, they are directed toward the relevant program based on their special needs or lack thereof. Multiple organizations collaborate on the diversion initiative.

Addressing the emergency and transitional housing needs of homeless persons

Beth-El owns and operates separate single dorm-style beds for men and women, as well as six rooms for families. In light of the Covid-19 Epidemic, Beth-El has temporarily contracted with a local motel for additional beds. Many of the people staying in City shelters for extended amounts of time have substance abuse issues and require additional services.

There is an additional winter shelter program that operates from November through March, though this past year the operational limit was extended through April.

Domestic violence survivors in the area are encouraged to seek help from BHCare Inc. and Domestic Violence Services of Greater New Haven for Domestic Violence Services. There is a need for transitional housing and separate housing for these populations. There is a disproportionate amount of shelter beds for men, compared to women, which is notable as the number of women experiencing homelessness is increasing Nationwide.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

According to the Beth-El Center and the Greater New Haven Coordinated Access Network (CAN), there is a need for more permanent supportive housing, rapid rehousing, and supportive services to assist people in need of housing. The Housing First Model's approach is to help individuals and families to access and sustain permanent rental housing as quickly as possible, without time limits, and with a standard lease agreement, as opposed to mandated therapy or service compliance. Beth-El offers a variety of services to promote housing stability and individual well-being on an as-needed basis; and to address the issues that caused their homelessness.

Due to the shortage of affordable housing, individuals and families with the lowest incomes are at-risk of homelessness. Beth-El provides programs to support landlords who house formerly homeless persons which helps to prevent them from re-entering the shelter system. Though some other programs exist, diversion is the primary strategy to prevent homelessness for this population.

According to the Point-in-Time Count, conducted on January 22, 2019, there were 503 individuals experiencing homelessness in the Greater New Haven area, 98 children in families, 50 adults in families, and 355 single adults. It is estimated that 9,903 youth under age 25 experienced homelessness or unstable housing across the entire State of Connecticut.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City of Milford will support the efforts of local agencies that provide assistance to families and individuals in transitional housing and will refer residents of the City that are at risk of becoming homeless to these agencies for help with financial literacy counseling, emergency rent/mortgage or utility payments, job training, and a newly funded security deposit program so that they can remain self-sufficient and avoid homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant based rental assistance, and property acquisition – supported by the CDBG program. The City of Milford will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

The City of Milford will ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

How are the actions listed above related to the extent of lead poisoning and hazards?

The Milford Health Department encourages all residents to take the necessary steps to prevent lead poisoning, including hiring a trained lead safe certified Renovation, Repair, and Painting contractor, and to access more information from the Connecticut Department of Public Health. The Connecticut Department of Public Health has an EPA Lead Renovation, Repair, and Painting Program.

The State Health Department estimates emphasize that the number of unreported/undetected cases of childhood lead poisoning is unknown. There are approximately 12,645 (76.3%) occupied and 3,360 (61.2%) renter-occupied housing units that were built prior to 1980 and will likely require lead hazard reduction.

How are the actions listed above integrated into housing policies and procedures?

The City of Milford will ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.
- The home purchaser receives the required lead-based paint pamphlet and notices.

SP-70 Anti-Poverty Strategy – 91.215(j)**Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

According to the 2014-2018 American Community Survey, approximately 5.3% of Milford residents live in poverty. A little under ten percent (9.7%) of the African-American population lives below the poverty line and 11.4% of “some other race alone” are below the poverty line. 6.9% of women live below the poverty line, compared to 3.7% of men.

The City’s anti-poverty strategy is based on attracting a range of businesses and supporting workforce development, including job-training services for low-income residents. In addition, the City’s strategy is to provide supportive services for target income residents.

Planned economic development and anti-poverty programs include:

- Job-training services
- Development/expansion of new commercial/industrial facilities
- Homeless prevention services
- Childcare assistance
- Promotion of new job opportunities

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Based on the public policies and programs for the City of Milford,

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Milford's CDBG Administrator has the primary responsibility for monitoring the City's Consolidated Plan and Annual Action Plan and will maintain records on the progress toward meeting the goals and the statutory and regulatory compliance of each activity. Timeliness of expenditures is achieved through scheduling activities, drawdown of funds, and maintenance of budget spread sheets which indicate the dates of expenditures. Program modifications are considered if project activities are not able to be completed within the allowable time limits of the grant. The CDBG Administrator is also responsible for the on-going monitoring of any sub-recipients for similar compliance.

The City of Milford's CDBG Administrator has a "monitoring checklist" that is utilized when programs and activities are reviewed. CDBG funded activities are monitored periodically. Public service subrecipients are required to use a Household Certification Form to document the participants demographics and income level. Housing and public facility projects are managed and inspected to ensure the program requirements are met and the owner is satisfied with the workmanship. During the on-site inspections, compliance with the local building and housing codes are reviewed. Copies of financial statements and audit reports are required and kept on file. For those activities which trigger Davis-Bacon Wage Rates, employee payrolls are required prior to payments and on-site employee interviews will be held. These monitoring standards are required for all City administered projects and sub-recipient activities.

For each activity authorized under the National Affordable Housing Act, the City of Milford has established fiscal and management procedures that will ensure program compliance and fund accountability. Additionally, the Department will ensure that the reports to the U.S. Department of Housing & Urban Development (HUD) are complete and accurate.

The monitoring process is not a "one-time" event. The process is an on-going system of planning, implementation, communication and following-up.