

**City of Milford, Connecticut**  
**Department of Economic & Community Development**

**Community Development Block Grant (CDBG)**  
**2021-2022 Annual Action Plan**  
**PROGRAM YEAR 47**

*30-Day Public Comment Period*  
*May 27, 2021 to June 26, 2021*

## **PROGRAM YEAR 47 Annual Action Plan (AAP)**

**Cover Letter to HUD** - Actual with Final Submission

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*This following report and attachments is on record in the Department of Economic & Community Development, posted on the City ECD webpage and is formally submitted in the eCon Planning Suite electronically to the Hartford CPD Office via the HUD Integrated Disbursement and Information System (IDIS).*

# Executive Summary

## AP-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 beginning October 1, 2020. 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 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.

### 2. Summarize the objectives and outcomes identified in the Plan

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 five-year strategies, priority needs, objectives, and goals were identified through a public participation process in February 2020 as described in the Citizen Participation Plan. A complete list of the strategy by goal and objective by priority is provided in the FY 2020-2024 Five Year Consolidated Plan.

#### **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.

**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.

**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.

**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.

**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.

## **Administration and Planning Strategy**

**Priority Need:** Continue sound management decisions and program practices. Request City support to execute, when required, public facility and infrastructure improvements to ensure Federal, State and/or local funds are expensed in a timely manner.

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

### **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.

A copy of the CAPER is available at the City of Milford's Economic & Community Development (EDC) and the Milford EDC webpage. HUD's Letter of Assessment on FY2019-20 CAPER achievements and performance was positive and Milford received a rating of satisfactory, versus unsatisfactory. In the FY 2019-20 CAPER, the City of Milford expended 100% of its CDBG funds to benefit low- and moderate-income persons. Total fund allocated to assist public services did not exceed the 15% statutory maximum and 18.69% of its funds were expended on Planning and Administration activities which is under the statutory maximum of 20%.

Prior to the end of the program year, HUD performs the annual timeliness standard 24 CFR 570.902 test to calculate the total Entitlement grant and Program Income available in the City's Line of Credit (LOC) against the total expenditures in the program year. The total LOC on August 2nd must not exceed a 1.50 % of the total of two grant year awards.

According to the PR56 Timeliness Report Milford's CDBG expenditure rate a direct result of delivering grant-supported activities in a timely manner was 0.66, well under the maximum of 1.50 Line of Credit ratio allowed.

### **4. Summary of Citizen Participation Process and consultation process**

The City of Milford followed its new 2020 Citizen Participation Plan updated as part of the process of accepting the CARES Act funds in response to the impact of the pandemic. The planning and preparation of the Annual Action Plan begins with a Notice of Funding Availability (NOFA) in the local Milford Mirror and on the City website. The NOFA and a CDBG Schedule is emailed each year at the end of January to a wide list of community leaders, potential recipients and interested parties, including agencies and organizations to notify the community that the annual planning process and how to apply for a grant.

The City with members of the Housing Partnership Committee held a virtual public hearing on April 14, 2021. The CDBG staff presents information on CDBG program performance, HUD updates and current program activities and projects.

During the public hearing the community agencies and organizations and its residents have the opportunity to discuss to present grant applications submitted in March and offer feedback on funding priorities, objectives and goals.

A copy of the FY 2021 Annual Action Plan is on display for public review during a 30-day public comment period beginning May 27, 2021 and ending June 26, 2021. The notice of a 30-day public comment period is published in the Milford Mirror newspaper and is posted on the City's ECD webpage. Interested parties who want to review a copy of the Plan may do so between 9:00 am -4:00 pm in the Department of Economic & Community Development, Parson's Government Center, 70 West River Street, 2<sup>nd</sup> floor, Milford, CT 06460 or access a FY21 Annual Action Plan pdf on the ECD webpage 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 30-day public comment period, and acceptance by the Board of Alderman, the City of Milford will submit the FY 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development Hartford Office on or before the due date on August 15, 2021.

A 2020 resident survey was circulated in conjunction with preparation of the 2020-2024 Five-Year Consolidated Plan. The results of the survey were used to help determine the five-year goals and outcomes. A more detailed analysis of the five-year priorities is contained new Analysis of Impediments. Both the 2020 Survey results and the Analysis of Impediments are available for review on City's ECD webpage

## **5. Summary of public comments**

Upon completion of the 30-day public comment period any written comments received will be included in the PY47 2021-2022 Annual Action Plan and provided to the Board of Alderman meeting in July 12, 2021. Appendix A contains all the public notices, the public hearing agenda and minutes, meeting handouts, any written public comments and a Board of Alderman Certified Resolution for submission to the HUD CPD office.

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

Written and verbal comments accepted during the public participation and approval process are attached and contained in Appendix A.

## **7. Summary**

The City considers all public comments throughout the year, written or verbal, when considering how to allocated CDBG funds in the community. Specific goals strategies are prioritized and listed in the Five-Year Consolidated Plan but are based on the HUD's mission to improve the general living conditions of low- and moderate-income residents of the City

of Milford, fund projects that sustain and protect the environment, and address the community development needs that serve to benefit all residents.

## **8. Budget**

FY 2021 Program Year, the City of Milford, CT proposes to allocate the HUD Federal CDBG award of \$533,354 to following activities:

1. Beth El Center, No-Freeze Emergency Shelter Staff	\$ 17,800
2. Beth El Center, Soup Kitchen Coordinator	\$ 14,000
3. Boys & Girls Club, After-school Program staff	\$ 11,500
4. Milford Adult Education, Job Skill Training Scholarship Funds	\$ 2,000
5. Literacy Volunteers of S.C., English Language Tutor, Coordinator	\$ 3,000
6. Milford Transit District, Transportation	\$ 11,500
7. Department of Human Services, Rent & Mortgage Assistance	\$ 14,000
8. Rape Crisis Center of Milford, Inc., 24/7 Victim Hotline Service	\$ 3,500
9. Bridges Healthcare Inc., New Roof (includes project delivery costs \$10,000)	\$ 60,000
10. CT Audubon Milford Point Coastal Center, ADA Ramp Improvements	\$ 22,198
11. DPW, Public Improvements, ADA Curb & Sidewalk	\$ 75,787
12. Milford Redevelopment & Housing Partnership, Catherine McKeen Code Updates	\$122,000
13. Single-Family Residential Repair Program	\$ 40,000
14. Residential Repair Program, Administration	\$ 30,000
15. Grant Administration & Planning	<u>\$106,069</u>
TOTAL	\$533,354

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	City of Milford	Department of Economic & Community Development

**Table 1 – Responsible Agencies**

### Narrative (optional)

The Department of Economic & Community Development serves as lead agency and administer of the Community Development Block Grant (CDBG) Program. The CDBG Administrator, with assistance and input from the Department Director, the Finance and Accounting departments is responsible for complying with HUD financial management and internal control regulations to expend CDBG funds in a timely manner.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Milford seeks to identify and develop a strategy to meet the housing and non-housing needs in the community through discussions and collaboration with the Housing Partnership Committee, the Mayor, City Departments, public and private housing property management, health and human service agencies, local business owners and the public.

#### **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(I))**

The City works with the following agencies to enhance coordination: City Department staff, non-profit and for-profit business community, Beth El Center, LLC, Milford Redevelopment & Housing Partnership (MRHP); Social service & mental health agencies; CT Department of Economic & Community Development (DECD), CT Department of Housing (DOH), Connecticut Conference for Municipalities (CCM), CEDAS, Connecticut Tourism and local fundraisers and City event, CT State Department of Emergency Management, CT Fair Housing Association, Partnership for Strong Communities, CT Housing Coalition and National Community Development Association (NCDA) for national housing and HUD updates.

#### **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.**

Coordination between the City, Beth El Center and the Milford Redevelopment and Housing Partnership (MRHP) to provide additional Housing Choice Vouchers to house the homeless and/or person's at risk of homelessness.

The City supports the efforts of the Milford Homeless Outreach Workgroup a volunteer group coordinated by the homeless shelter staff and attended by State DMHAS, regional public and private agencies, City Departments of Health, Library, Police, ECD, mental health professionals to assist unsheltered homeless individuals in Milford find services and housing.

The Beth-El Center (BEC), manages a homeless shelter and soup kitchen in Milford and works closely with CT Coalition to End Homelessness and the State of Connecticut Department of Housing (DOH) to receive Balance of State (CT BOS) as a regional partner but does not receive Continuum of Care (CoC) funds directly and receives HUD Emergency Food and Shelter Program (ESG) funds and Department of Mental Health and Addiction Services (DMHAS) for funds and support

services, the United Way of Milford and private donations and foundation grants. Additional funds to support increase in staff or facility space in conjunction with community development coalition charged with creating scattered permanent housing units for shelter residents and allow unsheltered individuals to enter the shelter begin the process of recovery and work towards food and housing security.

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

The Beth El Center is an actively participants in the CT campaign to end homelessness and uses of the Homeless Management Information System (HMIS) to report data and findings. It is a works closely with the New Haven BOS CoC, CT Coalition to End Homelessness, the Department of Economic & Community Development, the State Department of Housing, the Department of Mental Health and Addiction Services, regional agencies and local organizations and the Police and Fire departments to educate the community and develop a policy and procedures. It relies on services from Bridges Mental healthcare and addiction service referrals. The Beth El Center does not employ a Grant Development Officer to fundraise, access public or private grants to operate or expand its programs and services. A direct Emergency Solutions Grants Program (ESG) federal fund to assist suburban and rural with transitional housing, rapid re-housing, permanent supportive housing, and coordinated entry to prevent homelessness. With additional organizational support, the Center can expand its capacity to serve individuals with services and temporary housing.

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

**Table 2 – Agencies, groups, organizations who participated.**

1	<b>Agency/Group/Organization</b>	Beth El Center
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Monthly meetings with the Milford Homeless Outreach Workgroup, Milford Social Service Network, and the Milford Social Service Network and onsite subrecipient monitoring.

2	<b>Agency/Group/Organization</b>	Milford Transit District
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Transportation
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
3	<b>Agency/Group/Organization</b>	Milford Redevelopment and Housing Partnership
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Department of Economic & Community Development engage the PHA often via environmental reviews, ongoing, monthly PHA meetings, onsite subrecipient monitoring; monthly human service and housing meeting(s); phone conversations; CDBG public hearings.

### Identify any Agency Types not consulted and provide rationale for not consulting

Nationally operated agencies were not consulted directly but rather information was collected electronically, when needed.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	CT Balance of State (CTBOS)	CDBG financially supports services and improvements at the local Homeless Shelter facility.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
CT ALICE Report	United Way of Connecticut	CDBG seeks to financially help households struggling with the cost of living or financial hardship.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## AP-12 Participation – 91.105, 91.200(c)

### 1. Summary of citizen participation process/Efforts made to broaden citizen participation

#### Summarize citizen participation process and how it impacted goal-setting

The City of Milford adopted a new Citizen Participation Plan in 2020. The City updated its process to continue to provide opportunity for public involvement and transparency into the process for community in times of normalcy and emergency. The Citizen Participation Plan states the City's public participation process for developing community and housing goals and objectives; the duration of comment periods for each report or Plan, explains how the public can attend hearings, access information and records related to the grantee's use of CDBG funds. In addition, the City of Milford encourages neighboring municipalities, state government, staff, local agencies and organizations to consult on a local and regional matters related to housing and community planning to achieve an overall benefit to individuals experiencing adversity, and households with income levels at, or less than, the 80% area median income, who are disabled, have special needs, and at risk of homelessness.

#### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Hearing	Residents of Public and Assisted Housing  Residents, Local Agencies, and Non-profits	Minutes of Hearing attached	Minutes of Hearing attached	All comments received will be accepted
2	Internet Outreach	Non-targeted/broad community	Attached, if received	Attached, if received	Any written comments received will be accepted

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
3	Newspaper Ad	Residents of Public and Assisted Housing  Housing & service providers, local agency	Attached, if received	Attached, if received	Any written comments received will be accepted

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The City of Milford FY2021 Community Development Block Grant (CDBG) HUD Entitlement award amount is \$ 533,354. The City expects to receive \$10,000 in Program Income during the FY 2021 Annual Action Plan period. The City's FY 2021 CDBG program year starts on October 1, 2021 and concludes on September 30, 2022.

The following financial resources are identified for the FY 2021 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 2021 Consolidated Annual Performance & Evaluation Report (CAPER). The Anticipated Resources table reflects the 2020- 2024 Consolidated Plan section SP-35.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	533,354	10,000	7,435	550,789	2,061,856	Five years of funding at the FY 2020 funding level.

**Table 5 - Expected Resources – Priority Table**

**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

Milford generously provides local non-profit service agencies, the homeless shelter, and the senior center with office space in City Buildings at the cost of \$1.00. By alleviating some overhead cost, the organization can put all financial other resources toward assisting clients and effectively partner with the City to meet its objectives identified in the Consolidated Strategic Plan. CDBG leverages City investments in community development, improves infrastructure and the existing housing stock.

**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 expands use of City owned land for public open space and recreational purposes. It updates its Hazard Mitigation Plan as required and sustains an Emergency Preparedness Committee both of provide emergency relief guidance to City officials and residents in the aftermath of disaster. The City does not currently own land or property to support the development of workforce or moderately priced housing units.

**Discussion**

As is the case in many CT Towns, property and sales taxes are the primary source of local and state tax revenue. Municipalities are tasked with decreasing resident tax burden through budget cuts and obtaining outside resources to supplement the cost of necessary infrastructure improvements, maintenance and services to its residents.

Milford, like many towns in CT, face the challenge of housing individuals who are experiencing homelessness and



housing instability. Meeting these needs requires the City officials to address the underlining issue of a shortage of housing affordability and the lack of permanent housing for chronically homeless individuals, veterans among them, and ALICE families face housing monthly insecurity, or worse, have been evicted, will be forced to accept housing in unsafe neighborhoods and due to an eviction record, will rarely be given a chance to secure decent suitable housing again.

# Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

### Five-Year 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 Public Housing		Housing Strategy	CDBG: \$134,000	Rental units rehabilitated: 47 Household Housing Unit Homeowner Housing Rehabilitated: 4 Household Housing Unit
2	HSS-2 Housing Service Program(s)	2020	2024	Affordable Housing	Citywide	Housing Strategy Homeless Strategy Other Special Needs Strategy Community Development Strategy Economic	CDBG: \$20,500	Public service activities for Low/Moderate Income Housing Benefit: 25 Households Assisted

						Development Strategy		
3	HSS-4 Housing Education	2020	2024	Affordable Housing	Citywide	Housing Strategy Homeless Strategy Other Special Needs Strategy Community Development Strategy	CDBG: \$2,000	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
4	HSS-5 Homeownership	2020	2024	Affordable Housing	Citywide	Housing Strategy Community Development Strategy Economic Development Strategy	CDBG: \$15,000	Direct Financial Assistance to Homebuyers: 1 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	HMS-1, 3 Homeless Strategy	2020	2024	Homeless	Citywide	Homeless Strategy	CDBG: \$31,000	Homelessness Prevention: 900 Persons Assisted
6	SNS-1 Other Special Needs	2020	2024	Non-Homeless Special Needs	Citywide	Other Special Needs Strategy Community Development Strategy	CDBG: \$5,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4175 Persons Assisted
7	CDS-1,2,3,4,5 Community Development Improvements	2020	2024	Non-Homeless Special Needs	Citywide	Other Special Needs Strategy Community Development Strategy	CDBG: \$116,052	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4215 Persons Assisted Homeowner

								Housing Rehabilitated:  5 Household Housing Unit
8	CDS-4 Public Services	2020	2024	Non-Housing Community Developmen t	Citywide	Community Developmen t Strategy	CDBG:  \$23,819	Public service activities other than Low/Moderate Income Housing Benefit: 625 Persons Assisted
9	EDS-1,2,3  Economic Developmen t	2020	2024	Economic Developmen t	Citywide	Community Developmen t Strategy  Economic Developmen t  Strategy	CDBG:  \$30,000	Businesses assisted: 5 Businesses Assisted
Sort Order	Goal Name	Start Year	End Year	Category	Geographi c Area	Needs Addressed	Funding	Goal Outcome Indicator

10	AMS-1 Overall Coordination	2020	2024	Administration	Citywide		CDBG: \$103,093	Other: 0 Other
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**Table 6 – Goals Summary**

### Goals By Priority Descriptions

1	Goal Name	HSS-1 Preserve Existing Housing Stock
	Goal Description	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.
2	Goal Name	HSS-2 Housing Service Program(s)
	Goal Description	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. Engaging landlords with funds to support renters with the hopes of increasing the number of rental property owners willing to work with service providers in their re-housing efforts.
3	Goal Name	HSS-4 Housing Education
	Goal Description	Provide Fair housing laws to combat housing discrimination. Promote HUD Housing Counseling centers where households can learn budget practices that improve credit and the savings opportunity.
4	Goal Name	HSS-5 Homeownership
	Goal Description	Assist eligible first-time buyers who wish to own a home with down payment assistance, closing cost assistance and HUD Housing Counseling.

5	Goal Name	HMS-1, 3 Homeless Strategy
	Goal Description	Continue support to providers with the operation of shelters and emergency shelters to house and offer support services to youth and adults experiencing homeless and persons who are at-risk of becoming homeless. Short-term support services - including financial assistance, housing search assistance, and targeted services- has shown tremendous promise in resolving the immediate crisis of homelessness for many families and preventing their future returns to homelessness. Increase supply of rental property owners through existing service providers to support Federal and State Rapid Re-Housing efforts.
6	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.
7	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.

8	Goal Name	CDS-4 Public Services
	Goal Description	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.
9	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.
10	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide and promote funds to continue successful administration and compliance of Federal, State, and local funded programs including City project support and professional services to prepare HUD Plans and Reports.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

CDBG grant award policy and the agreement process is instrumental in the City's ability to meet the annual HUD timeliness ratio because it prioritizes grant allocations to essential public services, successful housing and economic programs and "shovel ready" public facility projects with contingency funds budgeted. Prospective Subrecipients are asked to demonstrate both activity eligibility and the organizational capacity to report and expend the awarded



funds in a timely manner. Adherence to CDBG and HUD regulations ensures the City activities benefit the greatest number of people by not duplicating awards within an activity category.

#### **PY47 Projects**

#	Project Name
1	Emergency Shelter
2	Homeless Shelter, Soup Kitchen
3	After School Program
4	Employment & Training
5	Literacy Volunteers of Southern CT
6	Transportation Services
7	Subsistence Payments
8	Rape Crisis Services
9	Healthcare Services
10	Neighborhood Facility
11	Sidewalk Improvements
12	Public Housing Modernization
13	Single Family Residential Repair Program
14	Residential Repair Program, Administration
15	Program Administration & Planning

**Table 7 - Project Information**

#### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocations are prioritized to address the obstacles experienced by the essential worker, these may include: Housing programs to address deferred home maintenance, prevent or reduce eviction rates, assist to obtain a suitable and safe home, improve tenant/landlord relation and address discrimination, and assist owners and renters struggling financially with the cost of mortgage, rent and utilities in order to cover medicine, transportation and/or vehicle costs needed to maintain employment. These obstacles are chronicled bi-annually by the Connecticut United Ways in data presented in

the ALICE 2018 report <http://alice.ctunitedway.org/wp-content/uploads/2018/09/UW-Milford-2018-ALICE-Catchment-Page.pdf>) ; community development and business assistance in the form of job creation, retention and employment training to improve basic office and technical skills of low/moderate income individuals looking for an new job/career opportunity to increase income; build capacity within non-profit service agencies and enhance public service programs that benefit persons who struggle with literacy, are homeless and hungry, support affordable safe child care for working families, reduce social isolation of homebound elderly and disabled individuals; improve access to public transportation.

## AP-38 Project Summary

### PY47 Project Summary Information

1	<b>Project Name</b>	Emergency Shelter
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Homeless Strategy
	<b>Funding</b>	CDBG: \$17,800
	<b>Description</b>	The "No Freeze" Emergency Shelter offer unsheltered persons seeking a warm place to stay when temperature are 32 degrees or colder. The service is state mandated. The Shelter provides a cot, a blanket, food and a shower overnight for up to 9 individuals. Increases in the number of individuals required the shelter become a warming center.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	9 to 25
	<b>Location Description</b>	90 New Haven Ave Milford CT
	<b>Planned Activities</b>	The "No Freeze" Emergency Shelter offers unsheltered persons seeking a warm place to stay when temperature are 32 degrees or colder.
2	<b>Project Name</b>	Homeless Shelter, Soup Kitchen

	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Homeless Strategy
	<b>Funding</b>	CDBG: \$14,000
	<b>Description</b>	The Beth El Center operator of the homeless shelter in Milford provides meal services to the homeless persons, or those at risk. The Soup kitchen coordinates groups of volunteer to provide a hot lunch and 'to go" dinners 7 days a week.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	200 persons had access to soup kitchen in 2021. The homeless shelter is a 90-day program for men, women and families.
	<b>Location Description</b>	90 New Haven Ave, Milford
	<b>Planned Activities</b>	Funds provided toward the Soup kitchen meal service coordinator
<b>3</b>	<b>Project Name</b>	After School Program
	<b>Target Area</b>	Devon Neighborhood of Milford
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$11,500
	<b>Description</b>	The Boys and Girls Club of Milford offers enrichment classes and homework club to school age children 5-18 yrs old.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	350 school aged children

	<b>Location Description</b>	59 Devonshire Road Milford
	<b>Planned Activities</b>	Offer a safe, healthy environment for school age children when parents are at work and/or to take part in enrichment classes.
<b>4</b>	<b>Project Name</b>	Employment & Training
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$2,000
	<b>Description</b>	Funding to Milford Continued Adult Education Program to provide scholarships to eligible individuals who enroll in a class designed to improve employment skills and job opportunities. Estimate the number and type of families that will benefit from the proposed activities: 16 individuals
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimate the number to benefit from the proposed activities: 16 individuals
	<b>Location Description</b>	70 West River Street, Milford
	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	Literacy Volunteers of Southern CT
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$3,000

	<b>Description</b>	Literacy Volunteer manager conducts program training for volunteers at the center and coordinates programs and enrollment of non-English speaking students to improve their English speaking and writing skills.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	95 individuals
	<b>Location Description</b>	16 Dixon Street, Milford
	<b>Planned Activities</b>	Director of Literacy Center coordinates training of volunteer, enrollment, and tutoring schedules.
6	<b>Project Name</b>	Transportation Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Other Special Needs Strategy Community Development Strategy
	<b>Funding</b>	CDBG: \$11,500
	<b>Description</b>	The Milford Transit District operates the State funded bus service and rail system in town which offers lifts for disabled persons. Estimate the number and type of families that will benefit from the proposed activities: 95
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimate the number to benefit from the proposed activities: 95
	<b>Location Description</b>	259 Research Drive, Milford
	<b>Planned Activities</b>	Funds support the transportation driver of a van equipped with ADA chair lift.

<b>7</b>	<b>Project Name</b>	Subsistence Payments
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$14,000
	<b>Description</b>	The Department of Human Services receives a Subsistence Payment grant to financially assist households who are unable to pay up to 1-3 rent or mortgage payments. The reasons may include underemployment, a medical bill, high utility costs, or an unforeseen life event.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated 20 households and 40 individuals
	<b>Location Description</b>	150 Gulf Street, Milford
	<b>Planned Activities</b>	Rental and mortgage assistance to stabilize housing
<b>8</b>	<b>Project Name</b>	Rape Crisis Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$3,500
	<b>Description</b>	Rape Crisis Center provides trained 24/7 hotline operators to offer guidance and support services to victims of sexual assault.
	<b>Target Date</b>	9/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated 15 persons benefit from this program
	<b>Location Description</b>	70 W River Street, Milford
	<b>Planned Activities</b>	Funds coordinate a volunteer 24/7 hotline service
<b>9</b>	<b>Project Name</b>	Healthcare Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$60,000
	<b>Description</b>	Improvements to a mental healthcare (03P) facility is a service provider located in Milford offering a wide range of treatment options primarily to Milford and West Haven residents.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimate 1600 to benefit from the activity.
	<b>Location Description</b>	949 Bridgeport Ave, Milford
	<b>Planned Activities</b>	Install a new roof on the facility
<b>10</b>	<b>Project Name</b>	Neighborhood Facility
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Other Special Needs Strategy Community Development Strategy

	<b>Funding</b>	CDBG: \$22,198
	<b>Description</b>	Improvements to a neighborhood facility (03E) featuring indoor and outdoor nature exhibits.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated to benefit 14,000 annual visitors and specifically 5,468 disabled individuals in Milford
	<b>Location Description</b>	1 Milford Point Road, Milford
	<b>Planned Activities</b>	Improvements to the facilities existing ADA ramp.
11	<b>Project Name</b>	Sidewalk Improvements
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Other Special Needs Strategy Community Development Strategy
	<b>Funding</b>	CDBG: \$75,787
	<b>Description</b>	Milford Public Works Department contracts to modify curbs and sidewalks to install ADA compliant curb cuts to improve safety for disabled persons & pedestrians. 5,434 disabled persons are estimated to benefit.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5,468
	<b>Location Description</b>	Town wide



	<b>Planned Activities</b>	Modify existing curbs and grade sidewalks for accessibility and pedestrian safety.
<b>12</b>	<b>Project Name</b>	Public Housing Modernization
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$122,000
	<b>Description</b>	Funds to assist the Milford Redevelopment & Housing Partnership to modernize low income and senior rental housing units.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	68 households will benefit from the activity
	<b>Location Description</b>	Jepson Rd, Milford
	<b>Planned Activities</b>	Electrical and fire code upgrades to units in complex
<b>13</b>	<b>Project Name</b>	Single Family Residential Repair Program
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	Single Family Program(s) energy efficient residential upgrades, repairs & install accessibility fixtures.
	<b>Target Date</b>	9/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated 4 Households
	<b>Location Description</b>	Program administered in ECD office, Milford
	<b>Planned Activities</b>	Fund to make improvements and repairs SF homes in Milford
<b>14</b>	<b>Project Name</b>	Residential Repair Program, Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	CDBG Staff market program, review applications, manage bid process and projects with assistance of a project manager, conduct Lead based paint inspections and retain LBP specialist for purpose of testing houses older than 50 years.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimate 4 households assisted and 4-10 program inquiries annually
	<b>Location Description</b>	Program administered in ECD Office Milford
<b>15</b>	<b>Planned Activities</b>	CDBG Staff market program, review applications, manage bid process and projects with assistance of a project manager, conduct Lead based paint inspections and retain LBP specialist for purpose of testing houses older than 50 years.
	<b>Project Name</b>	Program Administration & Planning
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	

	<b>Needs Addressed</b>	Administration, Planning, and Management Strategy
	<b>Funding</b>	CDBG: \$106,609
	<b>Description</b>	Program Administrator responsible for preparation of Plans, reports, financial and activity compliance in accordance with HUD regulations.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimate benefit: community
	<b>Location Description</b>	Planning & Administration from Milford ECD office
	<b>Planned Activities</b>	Program Administrator responsible for preparation of Plans, reports, financial and activity planning & compliance to HUD regulations.

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

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. CDBG funded projects are often funded to update an existing structure or facility to ensure it complies with the American for Disabilities Act (ADA) or remove an architectural barrier to create accessibility. Projects include both City and public facilities owned by a non-profit facility when the facility is located in located in, or serves, an area with a high concentration of low- and moderate-income persons and/or serves a clientele of which at least 70% certify their household incomes are at, or below, HUD Income limits for the Milford area.

### Geographic Distribution

Target Area	Percentage of Funds
Devon Neighborhood of Milford	10
Citywide	90

**Table 8 - Geographic Distribution**

## **Rationale for the priorities for allocating investments geographically**

Milford is an Exception Grantee which means it has no or very few areas in which 51 percent of the residents are low- and moderate-income. The Housing and Community Development Act of 1974, as amended, states that an activity shall be considered to principally benefit low and moderate income persons when "the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low and moderate income."

Over the past 15 years the concentration of low-moderate income census tracts and block groups has not exceeded 49%. In addition, the number of low/mod households around town fluctuate slightly each year which is why Milford does not have a designating geographical target area for long term CDBG investment. A predominate low to moderate income tracks and groups are typically found in the southwest border of Milford, along the Housatonic River and Long Island Sound. Census maps containing data on minority concentration, housing and low/moderate income concentrations are attached.

## **Discussion**

In the Devon and Walnut Beach neighborhoods property size is typically .5 acres, much of the housing type is described as seasonal and full year beach cottages and there is a concentration of private single family owner occupied and/or rented, apartments, and public housing rental complexes. The City of Milford has invested funding to improve streets and sidewalks, install parking meters and improve the public parking accessing Walnut Beach and the Silver Sands State beach boardwalk.

The PY47 Action Plan allocates additional funds to ensure the Beaver Brook Walking Trail and Bus Shelter projects are completed in 2021. The PY45 walking trail project bid came in over budget and the bus shelter project may come in under budget so additional funds may allow for a second ADA shelter to be installed in 2022.

Over the next five years a new sewer pump station project to elevate existing equipment above the new flood level and mitigate storm damage is anticipated. Due to repetitive to severe property damage caused by flooding and wind stemming from annual tropical storms, then Hurricane Irene in 2011 and Storm Sandy in 2012, FEMA expanded flood zone maps requiring new properties and areas to adhere to environmental regulations.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

With 461.5 units of affordable housing units, the City of Milford submitted a Certificate of Affordable Housing Completion on May 13, 2019 to the State. The State approved a four-year moratorium on any application to build housing under the State of Connecticut 8-30g Affordable housing law. In 2017 the State required it mandatory for all Connecticut Towns to prepare an Affordable Housing Plan by June 30, 2022 and a subsequent update every five years.

Milford has many attributes that attract employers to set up shop: its vicinity I95 and the Merritt Turnpike, a Metro North train station, a public transportation system, a recreational boat docks and harbors, tourism, a growing arts community, and private and public schools. Having been established in 1639 its housing stock is outdated, and neighborhoods are densely populated, not unlike many other coastal towns in CT. Milford has a cost-of-living index of 127, 6% higher than the Connecticut average and 27% higher than the nation. The average cost of goods and services is 1% higher than the Connecticut average and 21% higher than the nation. The cost-of-living index is comprised of these categories in each city: health care (5%), transportation (9%), utilities (10%), groceries (13%), housing (30%), and goods/services (33%). The cost of housing is 62% higher than the national average. Connecticut general sales tax is 25% and income tax are 35% higher than the national average. The high living cost create a unforeseen barrier to living in Milford for new residents, particularly households with moderate income, 80% low/moderate income levels or very low income levels. Data sources: CERC 2018 Town Profile, 2019 HUD income guideline, 2013-2017 Census Bureau American Community Survey (ACS), Zillow, ©2019 National Association of REALTORS® and the current data on Council for Community and Economic Research (C2ER) <https://www.areavibes.com/milford-ct/cost-of-living> .

Municipalities can effect change on some living costs such as housing and transportation. Supporting inclusionary zoning, transit-oriented housing would reduce the overall cost to live in Milford. State supports new transit and major improvements to road and railroad corridors to improve the residential and business opportunity in CT. Public transportation increases the pool of potential employees and attracts private investment in areas that are economically stagnate.

[https://www.huduser.gov/publications/pdf/better\\_coordination.pdf](https://www.huduser.gov/publications/pdf/better_coordination.pdf) <https://www.housingwire.com/articles/people-still-want-to-live-near-public-transportation-but-its-getting-more-expensive/> .

One Year Goals for the Number of Households to be Supported	
Homeless	575
Non-Homeless	16,045
Special-Needs	5,434
Total	22,054

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	25
The Production of New Units	0
Rehab of Existing Units	6
Acquisition of Existing Units	1
Total	32

**Table 10 - One Year Goals for Affordable Housing by Support Type**

## Discussion

Inclusionary Zoning can be adopted to create affordable units to count towards the State Affordable Housing Law 8-30g and construction of scattered affordable multi-Family units 3 and under, single-family homes, detached accessory dwelling units (ADU) in areas zoned for over 1.25 acres, incentive mixed use zones near public transportation. Existing zoning aren't indicative of a well-planned community of residential and commercial life that can react to the current economic and community needs. It does keep land cost high and perpetuates inequality. How does the public benefit from vacant commercial space? The Plan and Zoning Board are charged developing and acting on a long-term plan that benefits all its resident. It is called a Plan of Conservation and Development (POCD). The 2012 POCD is currently being updated and the public's input is welcome and needed. <https://www.ci.milford.ct.us/planning-and-zoning/files/plan-of-conservation-development>. HUD's mission to promote diversity and integrate communities through inclusivity. Inclusivity is apparent when town resident can actively engage individuals another color, ethnicity, race, and socio-economic background on a regular basis. The opportunity of education does result in stable employment above a living wage, experience of growing up in a safe neighborhood with few environmental or health concerns. The zip code in which we live does define an individual's life success rate. A community that recognizes these important factors benefit

economically and socially. Systemic Inequality: Displacement, Exclusion, and Segregation: How America's Housing System Undermines Wealth Building in Communities of Color

<https://www.americanprogress.org/issues/race/reports/2019/08/07/472617/systemic-inequality-displacement-exclusion-segregation/>

Housing choice at moderate prices is essential. A moderately priced 3-bedroom home in Milford for a household of three (3) earning 80% median area income in 2019 was \$230,400 with 20% down payment. Many of the homes in Milford built before 1969 were considered modest homes and were purchased by new buyers in blue collar and white-collar jobs. This housing stock is now 50 + years old and costly to maintain and improve. A third of the stock falls into disrepair. Half of the household incomes are at or below 50% median income of \$47,250 for a household of 3. and experience at least one or more of the four severe housing problems such as incomplete kitchens/plumbing, overcrowded and housing cost equaling 50% of a month's salary (see section NA-20 CHAS 2011-2015 data). Each of us knows someone on a budget to afford necessities, who care take and cannot work, with college tuition bills, are strapped with debt due to an unforeseen emergency, can't afford to retire, have no savings, or live on fixed income. These are the working humans that would benefit from reduced housing costs.

Development of moderately priced condominiums or small home choices can alleviate some of these issues. With criteria in place to meet neighborhood aesthetics, require inclusivity, and accommodate mixed age and income residents. With 22.7% residents over the age of 62 years old in Milford so could downsizing, a newly married couple, a new college graduate, a trash collector, a secretary could move into the town where they work. To sell a house with deferred maintenance is hare, but to sell it for a price necessary to buy or rent a newer smaller home in Milford, or anywhere on the coast, is unlikely. The reinvestment into an existing home by a buyer would not only improve property value for themselves and the neighborhood but increase tax revenue. Collaboration between a public/private/a non-profit housing developer, adopting incentive housing zones and inclusionary zoning are viable and smart plans that will stabilize the tax base in any town as well as bring tourism.



## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Milford Redevelopment & Housing Partnership (MRHP) is the public housing agency located in Milford. Its housing criteria is based on the Federal HUD Section 8 Housing Choice Voucher and is a tenant rental based program and is not active in a homeownership program. Households with eligible for a housing voucher may live one of several MRHP housing complexes which total 313 units of Federal HUD units and 135 State funded units for a total of 465. A third of the residents are over 62 years of age and/or disabled, the majority are white, all hold Housing Vouchers, and because the average annual income is \$15, 379, considered poverty level nationally and in CT. The MHRP outsources social services to local non-profits and the housing voucher program to Imagineers, LLC.

### **Actions planned during the next year to address the needs to public housing**

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. There is an overall need to accommodate families requesting accessibility features, to create additional 1- and 2-bedroom units to accommodate small families and family care takers of elderly residents.

HUD Consolidated Plan regulations require the PHA and Entitlement communities to prepare an Analysis of Impediments to Fair Housing Choice (AI), to exam the advantage of incorporating a Envision Center or aspects of the program, as well as broadband wiring and connection for residents. See section MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-income Households.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

To encourage involvement of public housing residents, CDBG public notices and the Housing Program Brochure are emailed to MRHP Director and staff to distribute and post notice to solicit tenant participation or comment, market housing ownership, and address socio-economic concerns. The CDBG Administrator has reached out to the MRHP staff and director with requests to meet with residents, offer job training opportunities to increase employment through adult continuing education and/or onsite training programs as a way to improve opportunity and household wages.

The MRHP Director states that it meets with tenants every six weeks to discuss tenant ideas and concerns at different housing complex locations. Dates, times, locations or meeting outcomes are not provided to the CDBG or EDC staff or published.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The MRHP is not designated as a troubled agency.

**Discussion**

The City ECD office assists both private and public housing tenants with questions concerning landlord/tenant issues. CDBG Administrator has specifically intervened with the MRHP on behalf of

PHA tenant and private tenants regarding accessibility, maintenance, and monthly rent complaints.

In the 2019, one (1) public housing resident requested assistance to resolve a maintenance issue in the entryway of complex and it was resolved.

The MRHP generally cooperates with the City and the ECD office but does not collaborate, even to share costs on mutual reports. As the participating jurisdiction, the City and the CDBG staff prepare and sign off on the MRHP Environmental review and its Annual Plan. With respect to publicizing public housing information, MRHP has its own webpage of the Milford website but it often submits meeting agendas the day of, it does not provide MRHP staff name and contact information, or notices of housing application deadlines or a link to housing applications, a housing waiting list, the contact information on Housing Choice Vouchers program managed by Imagineers, LLC.

[https://www.imagineersllc.com/program\\_management.asp](https://www.imagineersllc.com/program_management.asp) , general tenant and City information such as links to CDBG hearings and programs or City events and services. Not making information available in one place for its residents is a barrier to opportunity and inclusivity. The MRHP objected to creating its own MRHP website due to cost so, only the minimum information is published online for the public by third party housing sites. This lack of transparency will not serve to improve the image of the MRHP in Milford.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

According to the Beth-El Center and the Greater New Haven Coordinated Action 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.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The Greater New Haven Coordinated Access Network and Beth-El Center 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.

#### **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 rapidly re-house homeless persons, youth, families, and those who are 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: The following homeless goals are:

- HMS-1 Operational Support – Continue support to providers with the operation of shelters and emergency shelters to house and offer support services to youth and adults experiencing homeless and persons who are at-risk of becoming homeless. Short-term support services - including financial assistance, housing search assistance, and targeted services- has shown tremendous promise in resolving the immediate crisis of homelessness for many families and preventing their future returns to homelessness.
- HMS-2 Housing – Provide funds to homeless service providers to rehabilitate and reconstruction of the shelter facility,

emergency services, and added permanent supportive housing units for the chronically homeless persons and families.

- HMS-3 Landlord Engagement - Increase supply of rental property owners through existing service providers to support Federal and State Rapid Re-Housing efforts.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The Beth-El Center maintains a 34 bed 90-day shelter stay and soup kitchen in Milford. The shelter is made up of single dorm-style beds for men and women, as well as six rooms for families. The soup kitchen through volunteer groups and coordinated by the Beth El kitchen manager offers 2 meals a day, 7 days a week. The support service BEC staff provides at risk of, and homeless clients counseling, finds temporary and permanent housing, and other referrals to restabilize their lives. The chronically homeless struggling with addiction, health issues and unemployment often never achieve a level of self-sufficiency. In 2019 the Milford HUMAN Network formed to focus on the unsheltered population in Milford and after 12 months of outreach most all turned down assistance and housing.

There is an additional emergency shelter program that operates from November through March, though this past year the operational limit was extended through April 2020. In 2018 and 2019 many nights the emergency shelter converted to a “warming center” to accommodate a larger number of unsheltered people. The need for transitional housing and separate housing has rapidly increased in CT since 2019. There is a disproportionate amount of shelter beds for men, compared to women and families, which is notable as the number of women experiencing homelessness is increasing Nationwide.

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.

**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**

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.

Data on the Connecticut 2021 Point-in-Time Count was held on January 26, 2021. The updated PIT dashboard will be available soon. For an overview, go to <https://www.cceh.org/pit/overview/>. CT COVID-19 Homeless Response <https://cceh.org/?s=point+in+time+2020> In 2019 503 individuals experienced homelessness in the Greater New Haven area, 98 children and 50 adult 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.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or 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.

## **Discussion**

The City of Milford, the Department of Human Services, the Health Department and CDBG Administrator have joined the HUMAN Network to advocate for the homeless and create a plan of action to housing and provide services to the chronically homeless population in and around Milford. With the guidance of the CT State Department of Social Services and the CT Coalition to End Homelessness and the expertise of area support services such as TEAM it was recognized housing was the essential piece missing from the puzzle. Due to this group of professionals, funding for rapid rehousing,

a housing specialist and a new security deposit program has become available to try to assist individuals living in unsuitable living environments and families at risk of homelessness to find shelter temporary and secure permanent housing.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

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.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Policies to promote and incentivize private market housing development construction or renovation of different housing structures that appeal to retirees, elderly, and workforce households living fixed incomes or a moderate-income wage would benefit the City in many ways. A policy to maintain and increase existing affordable units through deed-restriction on accessory apartments, substantial renovations of high-density housing complexes, common land ownership development or a grandfather clause to allow existing multi-family property to be demolition and rebuilt or substantially rehabilitation in its current location. Also, a standard requirement to create ADA accessibility in residential structures with more than one story as a condition of zoning approval. Currently Milford has not adopted Inclusionary Zoning regulations to require a percentage of affordable housing units be included in residential construction over a certain number of units, or incentives to develop existing mixed-use property. The City Planner received an Incentive Housing Zone (IHZ) for the purpose of Incentive Housing Development (IHD) development. The City Planning & Zoning Board and the Board of Alderman did not vote in favor of an IHZ. In May of this year, the CDBG Administrator was asked to speak about housing before the Planning & Zoning Board during a special meeting to update its Plan of Conservation and Development to publish in 2021. Consideration of Inclusionary Zoning was requested, and the Planning & Zoning Board asked to receive information to review its benefits.

Conducting tenant landlord and fair housing workshops, engaging new landlord through incentives will be approaches used in 2020-21 to create an open dialog between tenants, landlords and the City staff, improve living conditions and property values. Information on where to find existing affordable housing unit in Milford is now available to the public. Creating the list alleviated on impediment for individuals looking for affordable housing. A comprehensive list with contact information was created using public information and Planning & Zoning records in 2016 and has since been updated annually. A link to the affordable housing list is posted on the City of Milford ECD webpage along with 8-30g information, Fair Housing Law, Landlord/Tenant Responsibilities, income guidelines, and the CDBG housing programs

information and applications.

**Discussion:**

It is the hope of the EDC staff a non-profit developer will partner and use CDBG funds to purchase existing housing to sell or rent to low- and moderate-income households. Beth El Center soup kitchen and shelter space is adequate, and the general size inhibits the staff's ability to manage the increased number of homeless persons in need. The clients would benefit greatly from a larger facility with increase temporary shelter and permanent supportive housing units. A PHA can act as a not-for-profit arm of a non-profit housing developer and another entity to apply for State financing to acquire existing residential property to substantially renovate and manage the property.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Milford has contracted with Urban Design Ventures to update its Analysis of Impediments to Fair Housing Choice (AI). It is currently available public review on the ECD linked to the CDBG Report page of the City of Milford website.

### **Actions planned to address obstacles to meeting underserved needs**

HUD Consolidated Plan regulations require the PHA and Entitlement communities to prepare an Analysis of Impediments to Fair Housing Choice (AI), to exam the advantage of incorporating a Envision Center or aspects of the program, as well as broadband wiring and connection for residents. See section MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-income Households.

Seek new and different support services that benefit low to moderate income residents surpass barriers to living in Milford, improve access to transportation, to health care, to child care, to housing and food and domestic violence.

### **Actions planned to foster and maintain affordable housing**

With 461.5 units of affordable housing units, the City of Milford submitted a Certificate of Affordable Housing Completion on May 13, 2019 to the State. If approved, a four-year moratorium will be placed on any deed restricted affordable housing. CDBG Administrator continues to promote financial support to organizations whose mission is to create affordable housing without a deed restriction. Continued review of 8-30g developments built and in construction for compliance of annual 8-30g housing certification according to the approved Affordable Housing & Fair Housing Plans, provision of FMR and income calculations, and fair housing information to developers, property owners, service providers and residents. Each property must submit to the City Planner an annual certification letter and spreadsheet by set-aside unit, rent amount and the income of the tenant. If the information is incorrect then the Zoning officer sends a letter instructing the owner the unit does not comply. CDBG homebuyer program decreases the cost of a first mortgage monthly payment, the Housing repair programs decrease the cost of home maintenance, improves a home value, and assist to create an affordable and suitable living condition for income eligible tenants.

### **Actions planned to reduce lead-based paint hazards**

Provide public information to educate homeowners and tenants on potential lead-based paint poisoning and safe ways to renovate a residential property to prevent reduce or eliminate the risk of lead-based paint poisoning to children.

### **Actions planned to reduce the number of poverty-level families**

Advocate to expand employment through job training skills and increase affordable housing options in safe neighborhoods.

### **Actions planned to develop institutional structure**

The Department of Economic and Community Development engages in various methods to consult and gather information it needs to improve communication and meet the needs of the underserved in the community. Mayor meets monthly with the City department heads to discuss projects, budget, issues and make announcements. To solicit suggestions prior to the NOFA and provide workshops and different meeting platform a second public hearing is held during the CAPER public comment period.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City supports the efforts of the HUMAN Network, a Milford Homeless Outreach volunteer group coordinated by the homeless shelter staff and attended by State DMHAS, regional public and private agencies, City Departments of Health, Library, Police, ECD, mental health professionals to assist unsheltered homeless individuals in Milford find services and housing.

In addition, the Social Service Network attended by area agencies and community leaders meets at the senior center to share information and discuss food insecurity, health, safety issues in the community and the special needs populations. The C-RIDE Committee a Health Department initiative members include legal and social service volunteers who advise on solutions for homeowners with issues around finances, health, hoarding, and property blight. The Department of Human Service (HS) works with the United Way of Milford, Salvation Army and CDBG staff to distribute financial assistance and subsistence payments to residents experiencing unstable housing conditions or medical bills, and provides clients with counseling including financial. HS administers CT State Energy Assistance Program, Food Stamps and Food Referrals, and works with TEAM Inc. and CT OMB Renter's Rebate Program to serve disabled, elderly and disadvantaged households; the Milford Senior Center on Aging, with 93% of its members over 62 years of age, receives a City and CDBG funding for daily services and transportation vehicle, and the Meal on Wheels program in Milford; the Literacy Volunteer Center of Milford assists non-English speaking individual learn to read and speak English; the Good Child Development Center offers vital preschool care for working parents; the victim of assault and violence advocate for victim rights, education and protection services in Milford; the United Way of Milford is an integral community partner as well as a source of private donations to non-profits; the United Way of Connecticut supports the Connecticut 2-1-1 is a free Referral Specialists are available 24 hours a day to assist residents with housing, food, healthcare, utility payments, and more.

Housing advocates promoting the benefits of housing options and zoning changes are in the minority in CT. To openly confront the opposition risks being “canceled” and real threat of retaliation. The small business community are supported by the City and the Chamber of Commerce. The City’s Hazard Mitigation Committee prepares the Emergency Management Plan coordinating with all Milford zoning, safety and health agencies as well as FEMA, the State DEEP and neighboring town officials to promote flood resiliency measures in and near flood zones and low-lying areas.

### **Discussion:**

Often CDBG Housing program applicants are not eligible but truly in need of home repair and maintenance. In the past, outreach to owner and non-owner occupied of multi-family homes has not been successful. A marketing campaign combined with workshops, survey’s and financial incentives on property repairs will be used to build relations and engage landlord cooperation and active involvement to improve and make existing housing affordable. The cost of land and property is very high to acquire for affordable purposes without a designated zoning. Town officials do not promote the link between a stable local economy, zoning changes and housing affordability. A united front would help residents better understand the economic balance and support housing choices that benefit them and are designed with neighborhoods in mind.

Reaching the underserved to assist them is often the greatest obstacle. The CDBG Administrator continues outreach methods and marketing options to publicize the housing programs and hearings to the public. Increased program participation, and public and written comment would benefit the City and the needs of the underserved.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- |  |          |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed  | 0        |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0        |
| 3. The amount of surplus funds from urban renewal settlements  | 0        |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan   | 0        |
| 5. The amount of income from float-funded activities   | 0        |
| <b>Total Program Income:</b>   | <b>0</b> |

#### Other CDBG Requirements

- |   |     |
|---|-----|
| 1. The amount of urgent need activities   | 0   |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 80% |

The City of Milford estimates that 70 to 100 % of CDBG funded activities will benefit low and moderate income individuals and families in the community during the one year period 2022-2022.