

Executive Summary

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

1. Introduction

The City of Milford, Connecticut is a HUD Entitlement Community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) Program. The City herein submits the fourth Annual Action Plan in coordination with the 2020-2024 Five-Year Consolidated Plan. The Annual Action Plan program year allocates funds to activities for completion between October 1 and September 30 each year. Annual grant agreements by Subrecipient and award amount are prepared and signed by the organization and the Mayor of Milford.

The annual action plan process follows a public participation process and meets the objectives and goals set forth by the 5-Year Strategic Consolidated Plan. Both plans are a collaborative effort between the City of Milford, the public, local and area agencies, housing advocates, service, and business organizations. The Five-Year Consolidated Planning process includes a series of public meetings, stakeholder interviews, resident surveys, statistical data, and review of the City's other community plans.

The 5-Year Consolidated Plan specifies the City will undertake activities to address community needs; promote services; support suitable and healthy living environment for Milford residents through the creation of, or improvement to, the housing stock in Milford; support fair housing; address slum and blight conditions; promote economic opportunities; with principal goal to benefit low- and moderate-income households and the community.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items, or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis, or the strategic plan.

The City of Milford FY 2020-2024 Five Year Consolidated Plan acts as a planning and a strategic document for the city. As an Entitlement Community, the City is tasked to comply with the HUD regulations developing and funding CDBG activities and programs in accordance with the objectives outlined in the 5-Year Consolidated Plan. Grant proposals are determined eligible if the activity both meets a primary national objective, such as household income, and is aligns with an activity Matrix Code and the Integrated Disbursement and Information System (IDIS), a HUD software reporting system. The current FY 2020-2024 Five Year Consolidated Plan strategies and needs are listed by priority. A full description by priority can be found in FY 2020-2024 Five Year Consolidated Plan which is available in the ECD office and on ECD webpage.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The U.S. Department of Housing and Urban Development (HUD), Region I, Hartford Field Office of Community Planning and Development (CPD) performs its annual assessment of its grantees performance upon receiving the Consolidated Annual Performance and Evaluation Report (CAPER) each program year. After reviewing the CAPER, HUD prepares an Annual Assessment letter. The HUD FY2021 PY47 assessment determined the City of Milford continues to demonstrate the capacity to administer the CDBG grant and activities in a manner consistent with HUD regulations and has makes progress to meet its housing and community development goals. The CAPER is available at the City of Milford’s Economic & Community Development (EDC) and the Milford EDC webpage.

On August 2, HUD performs an annual timeliness test as required under 24 CFR 570.902. The test calculates the amount of Entitlement grant and Program Income available to spend from the City’s

Federal Line of Credit (LOC) against the total expenditures during the program year to determine whether the total LOC is at or below the 1.50 maximum ratio. Milford's continued compliance with this timeliness requirement is a direct result of its yearly support to its grant subrecipient and their diligent management of CDBG grant funding allocated during the program year. According to the PR56 Timeliness Report on May 1, 2023, Milford's ratio equaled 1.33, well under the maximum 1.50 allowed in the Line of Credit. (Appendix A - PR56 Timeliness Report)



U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Integrated Disbursement and Information System

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Current CDBG Timeliness Report
Grantee : MILFORD, CT

PGM YEAR	PGM START DATE	TIMELINESS TEST DATE	CDBG GRANT AMT	--- LETTER OF CREDIT BALANCE ---		DRAW RATIO		MINIMUM DISBURSEMENT TO MEET TEST	
				UNADJUSTED	ADJUSTED FOR PI	UNADJ	ADJ	UNADJUSTED	ADJUSTED
2021	10-01-21	08-02-22	533,354.00	580,467.08	594,063.42	1.09	1.11		
2022	10-01-22	08-02-23	556,846.00	727,291.10	737,905.15	1.31	1.33		

4. Summary of Citizen Participation Process and consultation process

The process is described in the 2020 Citizen Participation Plan. The Citizen Participation Plan documents how an entitlement community will notify the public of information related to allocation and expenditure of federal funding, and the opportunity to participate and submit public comment as required by HUD. The 2020 Citizen Participation Plan updated to include a structure for public participation during a state of emergency. The Citizen Participation Plan details the public and consultation participation process by report and directs the city to publish a Notice of Funding Availability (NOFA) in a local newspaper, on the City website, and an email to city officials, agencies, interested parties and non-profit organizations at the start of the Annual Action Plan process. The NOFA includes the date of the first public hearing, the due date of the grant application and the CDBG grant program guideline and HUD requirements. The CDBG staff provides a summary of CDBG program requirements, grant criteria, HUD news, end of year performance, and updates on current program year activities and projects as all public hearings and a public comment period to review grant proposals, provide feedback, and discuss housing and community needs.

The Housing Partnership Committee (HPC) is a city ordinance created in accordance with the provisions of Chapter 137c, Section 8-336f of the General Statutes of the State of Connecticut effective September 26, 1989. The HPC currently offers technical assistance to the ECD staff. Its structure allows it to play a fuller part as a sound board and resource for further discussion of housing in Milford. The Mayor appoints citizens to seven (7) positions with expertise in: land use, wetland, zoning, construction builder, real estate, non-profit agency, public interest group(s) and housing professionals. In addition, the city updated its Analysis of Impediments in 2020 through its 5 Year Consolidated Plan Process and a 2020 resident survey.

5. Summary of public comments

A summary of public comments to date, will be available with the FY2023 Annual Action Plan as published for public notice beginning May 4, 2023 and ending June 6, 2023 in the local newspaper, on the City's ECD webpage and available to review in the Department of Economic & Community Development (ECD), Monday-Friday 9:00 am -4:00 pm Parson's Government Center, 70 West River Street, 2nd floor, Milford, CT 06460. To access CDBG Reports, the Public Notice and the Plan, go to <https://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-annual-reports>. A second public hearing will be held on Wednesday, May 10, 2023. All comments received during the 30-day public comment period will be added to the final Annual Action Plan under the Public Comment Appendix along with a CDBG Schedule, the public notices, the hearing agenda(s) and minute(s), informational handouts, written public comments and a Board of Alderman Certified Resolution

After acceptance by the Board of Alderman, the City of Milford will submit the PY49 2023-2024 Annual Action Plan to the U.S. Department of Housing and Urban Development Hartford Office on or before the due date on August 15, 2023.

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

All written and verbal comments are accepted. No comments or views were rejected during the public participation and approval process.

7. Summary

The specific goals strategies are derived from the HUD mission to improve the general living conditions of low- and moderate-income residents in Milford, update facilities that sustain and protect the environment, and address community needs and that benefit many residents.

8. Grant Activity Budget

The City of Milford received the annual HUD Entitlement Award letter on February 27, 2023, notifying the City of Milford it will receive \$560,307 in Community Development Block Grant funds. The FY 2023 Program Year 49 award will be allocated as follows.

Human Services, Rent & Mortgage Assistance	\$ 15,500
Milford Transit District, Transportation Driver	\$ 14,000
Literacy Volunteers of S.C., Program Coordinator	\$ 3,500
Milford Council on Aging, Food Bank staff	\$ 2,546
Boys & Girls Club, After-school Staff	\$ 12,000
Beth El Center, Homeless Shelter, Support Staff	\$ 18,000
Beth El Center , Soup Kitchen Coordinator	\$ 15,000
Rape Crisis Center of Milford, Inc., 24/7 Hotline	\$ 3,500
DPW, Public Improvements, ADA Curb cut	\$ 50,261
Milford Redevelopment Housing Partnership	\$ 90,000
Single-Family Residential Repair Program	\$ 70,000
Housing Program Administration	\$ 19,000
Multi-Family Residential Repair Program	\$ 75,000
Homeownership Program	\$ 60,000
Grant Planning & Administration	\$112,000
TOTAL	\$560,307

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	MILFORD	Department of Economic and Community Development

Table 1 – Responsible Agencies

Narrative (optional)

Milford Department of Economic and Community Development (ECD) is the lead agency and the CDBG Administrator is responsible for preparing a Five Year Consolidated Plan; the Annual Action Plan, the related Environmental Review (ERR) and Request Release of Funds (RROF); the Consolidated Annual Performance Evaluation Report (CAPER); financial management and grant reimbursements; HUD reporting and city reimbursements in the HUD Integrated Disbursement and Information System (IDIS); federal activity and project compliance; oversight and management of the housing program(s); supervising and hiring of CDBG staff; and public inquiries related to the grant and local housing concerns.

Consolidated Plan Public Contact Information

Ms. Julie Nash, Director
Ms. Sheila Dravis, CDBG Administrator
City of Milford

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

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Milford process of consultation includes but is not limited to discussions, online survey, public hearings and meetings to garner community needs, gaps in services from agencies and interested parties including the Milford Redevelopment and Housing Partnership/PHA, social services, victim advocacy groups, housing advocates and providers, the State Department of Housing, CT Coalition to End Homelessness, city departments, etc. All options are employed to engage stakeholders and residents to identify needs, service gaps and disconnects between agencies, and funding goals. Annual grant awards are reflective of public input, meeting(s) and the Five-Year Consolidated Plan strategies and priorities.

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 Homeownership Program, improvements to public housing complexes and scattered site housing.
- Social Services Agencies – Discussed the benefits of a food bank open at regular business hours.
- Housing Providers – Initiatives to buy or rehabilitate housing to resell as affordable housing units to low- and moderate-income households.
- Connecticut Coalition to End Homelessness – Statewide organization advocates for funding to homeless providers, provides training and technical services to organizations and municipalities.
- Beth-El Center – A local homeless shelter offers homeless response services, food and housing support to the need people who are homeless or at-risk of homelessness through a coordinated Intake process with the State and the New Haven County CAN.
- Bridges Healthcare – A state-designated behavioral health clinic offers counseling, emergency intervention, and support services to help persons recover from mental health substance use, social challenges find a path forward.

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, Beth El Center 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 Center 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 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 City of Milford is not an ESG, HOPWA or HOME entitlement grantee. The Connecticut Department of Housing (DOH) is a recipient of ESG funds and primary resource for Beth El Center, LLC, a homeless response shelter program that provides rapid rehousing assistance with case management and rental assistance. The Connecticut DOH “Balance of State” CoC is a regional Coordinated Access Networks System (CANs) and Milford partners with the Greater New Haven CAN system. The Greater New Haven CAN establishes the priorities, reviews and monitors priorities and goals, and reviews changes required by the Connecticut Balance of State CoC. CoC strategies include 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 clients through the Continuum of Care (CoC) system and conducts an unduplicated count of those experiencing homelessness within the State of Connecticut on a yearly basis. Journey Home is both an HMIS and CAN Lead Agency. HMIS falls under the guidelines and requirements of a county’s 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 jurisdiction’s consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated.

1	Agency/Group/Organization	City of Milford
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development MA-65 Hazard Mitigation

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The organization was consulted through a combination of meetings, interviews, and phone calls to ascertain the needs of the City of Milford residents. Multiple Internet service providers cover Milford and offer internet options to private individuals. The City of Milford offers free Wi-Fi in public buildings as do businesses. Milford is home to a highly educated community. The area has remarkably high public transportation usage. Residents expect to remain connected to their jobs and their families at all times, which means dependable internet. Cable and DSL are the two most prevalent options. Optimum provides cable to 100% of the city and Frontier provides DSL to 99% of residents. Residents from Woodruff Road to the Coast can access these options. Frontier is also beginning to offer fiber optic connections to Milford residents. Its likely this offering will expand in the future. Businesses in the area have two additional fiber optics providers Fiber Tech and Optimum. In addition, 1% of businesses can get copper wire internet from Broadband Networks. The City of Milford is a coastal community that is also surrounded and intersected by water bodies. As a result, the Citys Hazard Mitigation Plan identifies flooding as the Citys 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. The City of Milfords 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</p>
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		low-lying areas. As of 2018 the City of Milford has earned a class of 9, which gives all flood insurance policy holders an automatic 5% deduction on their premiums.
2	Agency/Group/Organization	LITERACY VOLUNTEERS OF SOUTHERN CONNECTICUT, INC.
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the public hearing and answered questions on grant proposal for funds to support the volunteer program to assist adults looking for improve English written and verbal language skills in the City of Milford.
3	Agency/Group/Organization	BHCARE INC
	Agency/Group/Organization Type	Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Victim Advocate
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attends public hearings and is a past subrecipient. Work continues to counsel victims of domestic abuse on their rights alternative housing and educate the public on the signs of domestic violence.
4	Agency/Group/Organization	MILFORD REDEVELOPMENT & HOUSING PARTNERSHIP (HOUSING AUTHORITY)
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. 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.

5	Agency/Group/Organization	Beth El Center
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. 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. Beth El Center attended the public hearing to discuss the increased food and housing insecurity and how to address the growing need. The committee asked questions on grant proposal request for funds to support the Soup Kitchen and Emergency Shelter "No Freeze" program.
6	Agency/Group/Organization	Milford Agency on Aging/Senior Center
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Milford Agency on Aging (Senior Center) director was consulted on elderly needs in the city. The Director attended the public hearing to discuss the increased number of adults requesting participation in the Meals on Wheels program.
7	Agency/Group/Organization	Department of Human Services
	Agency/Group/Organization Type	Services - Housing Services-Health Health Agency Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Milford Director of Human Services and Public Health Department was consulted about the housing and health needs in the City. The Director attended the public hearing and answered questions on grant proposal request for funds to support Rent & Mortgage Assistance Program.</p>
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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 community needs. See Appendices, Public Comment section for hearing minutes and NOFA Mailing list.

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 Coalition to End Homelessness	The Connecticut Coalition to End Homelessness was consulted for resources and technical assistance rehouse and offer homeless services through the Coordinated Access Networks (CAN) The program consists of state and community providers though the DMHAS system.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

- The EDC staff is in contact with the following City departments and agencies:
 - Mayor's Office
 - Hazard Mitigation Committee
 - Milford Information System & Government Access TV
 - Internet Access CT.gov
 - Fair housing partners
 - Agency on Aging
 - Homeless Service providers
 - Department of Land Use, Zoning and Inland Wetlands
 - Department of Public Works
 - Department of Health & Human Services
 - Milford Redevelopment & Housing Partnership
 - Literacy, Job Training and Workforce Programs
 - BHCare, LLC - Domestic violence victim advocates
 - Child Care Centers
 - Area service and housing advocates
 - Fair housing – CT Fair Housing Center and Connecticut Human Rights Organization (CHRO)

- Milford Agency on Aging – Senior Services
- Beth El Center, DMHAS Coordinated Access Networks (CAN), CT Coalition to End Homelessness.

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.

Inclusivity and transparency are motivations used in outreach and to connect with diverse group(s) of residents who may also be or become beneficiaries of the federal funding. To broaden opportunity for low- and moderate-income households, marketing the CDBG program(s) include mailing and posting brochures to local agencies and in city buildings, advertising public notices, program announcements and housing resource lists on the ECD webpage, on local media sites and by email to MRHP, regional and local agencies and distribution list of interested parties to increase awareness of CDBG financial assistance programs.

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	URL (If applicable)
1	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Any</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Local government officials</p>	<p>All reports notices, public comments, mailings, and handouts are posted on the City ECD webpage.</p>	<p>All reports notices, public comments, mailings and handouts are posted on the City ECD webpage.</p>	<p>All reports notices, public comments, mailings and handouts are posted on the City ECD webpage.</p>	<p>https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-annual-grant-reports-application-process-public</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Any</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Municipal officials and directors</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS report upload and in the office.</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS report upload and in the office .</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS report upload and in the office.</p>	<p>https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-annual-grant-reports-application-process-public</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Any</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Seniors</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	<p>https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-annual-grant-reports-application-process-public</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Any</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Municipal officials, Staff and Grant Applicants</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	<p>Appendix - Citizen Participation Section, Notices, minutes and public comments, mailings and handouts are included in IDIS upload and in the office.</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The proposed PY49 Annual Action Plan grant budget is based on the HUD FY23 formula awards published and provided to the City of Milford on February 27, 2023. The City estimates it will not receive Program Income during the program year. The FY 2023 CDBG Program Year 49 begins October 1, 2023, and ends on September 30, 2024.

The Anticipated Resources table reflects the 2020- 2024 Consolidated Plan section SP-35 which are some financial resources the City may use to address identified community needs.

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	\$560,307	0	\$725,000	\$560,307	\$1,000,000	Estimate over five years at the FY2020 award 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:

- Coronavirus Aid, Relief, and Economic Security Act
- American Rescue Plan Act
- Federal PILOT Grant
- Education Cost Sharing

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

The City of Milford generously provides grants and/or office space to local non-profit organizations such as, Beth El Center/Homeless shelter, the Milford Senior Center, the Human Services, the Milford Transit District, the Literacy Center, and Rape Crisis Center. Local support alleviates costs so the organization can direct its financial resources toward assisting clients and effectively partner with the City to meet its objectives identified in the Consolidated Strategic Plan. CDBG leverages City investments to improve and develop its infrastructure.

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 purchased land to maintain open space next to Orchard Hills Public Golf course and a two commercial properties for which a private development company and the Boys & Girls Club of Milford have control. The Milford Hazard Mitigation Committee updates its plan every five years and coordinates an Emergency Preparedness Committee to provide guidance to City officials and residents in the aftermath of a natural disaster. The City has not offered land or property to support the development of the workforce or moderately priced housing units.

Discussion

To address the needs identified in the Plan both resources and outside expertise are necessary. Municipalities under pressure to reduce residential tax burden cut budgets that directly affect the city's ability to maintain and improve infrastructure and the public school system. These are services and amenities that are valued and have benefited past, current and future residents.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

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 91.215(b)

The housing stock in Milford, like many towns in CT, is predominantly single-family style homes. 70.9% of the homes in Milford are single family type according to the 2021 American Community Survey (ASC) of Housing Characteristics. By housing type, the number of single-family (1) unit and multi-family (2-4) unit is reported to have slightly decreased Milford between the 2018 to the 2021 American Community Survey (ASC) of Housing Characteristics Census data (Appendix B). In 2018 there were 23,179 total housing units in Milford. In 2021, the total number of housing units increased by 184 units. (The margin of error is the same and units are calculated on actual building permit(s) and/or construction C/O at the time.) The rental vacancy rate in 2018 was 7.9%, the decrease in a three (3) year period to 4.8% does not benefit the City of Milford. It demonstrates the willingness of developers to react/plan for the high housing demand and short supply of homes. Had residential zoning regulations allowed more duplex and townhome "housing type" along with rental units the housing stock is improved and increased, and rental and home prices are attainable for household 55+ years of age and families. The reality that current residential zoning in Connecticut and nationally does negatively affects residents, is not being acknowledged by the local and federal governments. The State of Connecticut and several state housing advocates have acknowledged and are actively trying to modify existing residential zoning laws to rectify the historic disparity zoning has had on low and moderate income families.

The population of Milford is aging and would benefit from a single level or smaller housing units with less land to maintain. According to the Census ACS data population in 2021, 36% of residents are over the age of 55 years old. (Appendix B).

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	Citywide	Housing Strategy	CDBG: \$314,000	Homeowner Housing Rehabilitated: 40 Housing Unit: 25
2	HSS-2 Housing Service Program(s)	2020	2024	Affordable Housing	Citywide	Housing Strategy Community Development Strategy	CDBG: \$15,500	Public service activities for Low/Moderate Income Housing Benefit: 16 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	CDS-4 Public Services	2020	2024	Non-Housing Community Development	Citywide	Community Development Strategy	CDBG: \$35,546	Public service activities other than Low/Moderate Income Housing Benefit: 685 Persons Assisted
4	HMS-1 Operational Support	2020	2024	Homeless	Citywide	Homeless Strategy	CDBG: \$33,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 215 Beds Homelessness Prevention: 263 Persons Assisted
5	EDS-2 Employment	2020	2024	Economic Development	Citywide	Community Development Strategy Economic Development Strategy	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted
6	CDS-2 Community Facilities	2020	2024	Non-Housing Community Development	Citywide	Other Special Needs Strategy Community Development Strategy	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 18,887 Persons Assisted
7	CDS-1 Infrastructure	2020	2024	Non-Homeless Special Needs	Citywide	Other Special Needs Strategy Community Development Strategy Economic Development Strategy	CDBG: \$50,261	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,593 Persons Assisted
8	AMS-1 Overall Coordination	2020	2024	Administration	Citywide	Administration, Planning, and Management Strategy	CDBG: \$112,000	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	HSS-1 Preserve Existing Housing Stock
	Goal Description	2020-2024 Goals include: Financial assistance to rehabilitate and modify Single-Family residential property to benefit low-and-moderate-income owners and Multi-Family properties to benefit non-owner occupants and modernization of public housing rental units owned by the Milford Redevelopment Housing Partnership (MRHP). The Multi-Family residential housing initiative is marketed to property owners and tenants as well as housing organizations who assist their clientele to secure housing. To increase the number of rentals through mixed use development allowed with CDBG funds. Housing options are extremely important for a local economy and reduce the overall cost of housing for low/moderate income ALICE households and persons at risk of homelessness experiencing housing instability.
2	Goal Name	HSS-2 Housing Service Program(s)
	Goal Description	2020-2024 goals include housing service programs: security deposit program; Subsistence Payment i.e., Rent, mortgage and utility assistance program and fair housing / landlord engagement efforts.
3	Goal Name	CDS-4 Public Services
	Goal Description	2022-2024 Goals include 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.
4	Goal Name	HMS-1 Operational Support
	Goal Description	2020-2024 Goals include the following homeless shelter services: emergency shelter, soup kitchen and a housing diversion specialist.
5	Goal Name	EDS-2 Employment
	Goal Description	2020-2024 Goals include employment and training scholarships provided to eligible applicants enrolled in job skill classes offered through the Milford adult Education Program.
6	Goal Name	CDS-2 Community Facilities
	Goal Description	2020-2024 goals include exterior and interior improvements to non-profit public & community facilities.

7	Goal Name	CDS-1 Infrastructure
	Goal Description	2020-2024 goals include accessibility improvements to City facilities, and infrastructure such as curb cuts, sidewalks, and roads.
8	Goal Name	AMS-1 Overall Coordination
	Goal Description	2020-2024 goals include Program Administration of the federal grant and individual programs administered within the ECD Office.

Projects

AP-35 Projects – 91.220(d)

Introduction

Compliance with CDBG and HUD regulations ensures the City activities benefit the greatest number of people by not duplicating awards within an activity category. A consistent and transparent CDBG grant application and the agreement process is instrumental for the organizations who seek federal financial assistance. Grant Applicants understand it is essential to come to the process prepared to demonstrate both activity eligibility and the organizational capacity and begin the program or project on the first day of the new program year in order to report and expend an activity award in a timely manner.

Projects

#	Project Name
1	Subsistence Payments
2	Transportation Services
3	Employment and Training, Literacy Program
4	Food Bank
5	Child Care, After School Program
6	Homeless Shelter, Emergency Shelter Services
7	Homeless Shelter, Soup Kitchen Services
8	Services for Victims of Violence: Domestic, Dating, Sexual Assault, Stalking
9	Public Facility Improvement, ADA Curb & Sidewalk Program
10	Single Family Residential Repair Program
11	Residential Repair Program, Administration
12	Multi-Family Residential Housing Repair Program
13	Homeownership Assistance
14	Public Housing Modernization
15	Program Administration & Planning

Table 7 - Project Information

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

Allocations priorities address obstacles experienced by individuals living on fixed incomes, earning a low hourly wage and under-employed households with and without children. New and current CDBG activities benefit household requests for security deposit assistance to pay the total upfront cost to rent an apartment; make residential housing repairs to home in poor condition or with a code violation; assist with monthly rent and utility payments due to income loss or high cost to repair a car or a medical bill, etc.; employment training classes to improve an individual's opportunity to earn a higher hourly rate; tutor to improve English literacy; prevent homelessness and hunger; support affordable safe child care for working families; transportation for disabled and the elderly; expand the hours of an existing Food Bank and delivery food, and continue the Meals on Wheels services to assist seniors to age in place. To learn more about how to advocate and create change in Connecticut <https://unitedforalice.org/state-overview/Connecticut> To review the Connecticut United Way ALICE 2019 report <https://alice.ctunitedway.org/>

AP-38 Project Summary Information

1	Project Name	Subsistence Payments
	Target Area	
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$15,500
	Description	The Department of Human Services runs a Subsistence Payment grant to financially assist households with up to 1-3 months' rent or mortgage payments.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 32 individuals and 16 households.
	Location Description	150 Gulf Street, Milford, CT 06460
	Planned Activities	The Department of Human Services runs a Subsistence Payment grant to financially assist households with up to 1-3 months' rent or mortgage payments.
2	Project Name	Transportation Services
	Target Area	Citywide

	Goals Supported	
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$14,000
	Description	The Milford Transit District manages the state supported bus transportation services in Milford as well as along the CT coast from New Haven to Norwalk. The in town bus line offers a discount to elderly and disabled persons, provides wheel chair lift access and will schedule pick ups for medical appointments.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 90 individuals The Milford Transit District schedules rides for elderly and disabled residents who need assistance and chairlift access to keep medical appointments, run errands and shop.
	Location Description	Service, Citywide. Office, 259 Research Drive, Milford
	Planned Activities	The Milford Transit District manages the state supported bus transportation services in Milford as well as along the CT coast from New Haven to Norwalk.
3	Project Name	Employment and Training, Literacy Program
	Target Area	
	Goals Supported	
	Needs Addressed	Economic Development Strategy
	Funding	CDBG: \$3,500
	Description	Literacy Volunteers of S.C. manager trains volunteers to tutor to improve English speaking skills and coordinates tutoring session and materials.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 47 individuals
	Location Description	16 Dixon St, Milford, CT 06460

	Planned Activities	Literacy Volunteers meet one on one or in groups with non-English speaking adults to improve their English speaking and writing skills.
4	Project Name	Food Bank
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$2,546
	Description	The food bank is open to the general public and will begin to provide food delivery to home bound households.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Senior Center expects to serve up to 100 individuals with the expanded public hours and additional food delivery service.
	Location Description	9 Jepson Drive, Milford CT 06460
5	Planned Activities	Senior Center will expand the food bank hours from 4 days to 5 days. The food bank is open to the general public and will begin to provide food delivery to home bound households.
	Project Name	Child Care, After School Program
	Target Area	Devon Neighborhood of Milford
	Goals Supported	
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$12,000
	Description	The Boys and Girls Club of Milford provides an after-school program to school age children 5-16 years old at the Facility on Devonshire Rd, Milford.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 300 individuals at the facility on Devonshire Rd.
	Location Description	59 Devonshire Rd, Milford CT 06460

	Planned Activities	The Boys and Girls Club of Milford provides an after-school program to school age children 5-16 years old.
6	Project Name	Homeless Shelter, Emergency Shelter Services
	Target Area	
	Goals Supported	
	Needs Addressed	Homeless Strategy
	Funding	CDBG: \$18,000
	Description	Beth El Center operates an Emergency Response Shelter and assists individuals in need of food and temporary housing, shower, and support services in order to reduce the number of unhoused, living outside or in cars where conditions are quite unsanitary and unsuitable for any human at any time or for any period of time. Additional services include state mandated "no freeze" shelter and cooling center, CAN housing diversion and a soup kitchen.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 220 individuals
	Location Description	90 New Haven Ave, Milford CT 06460
	Planned Activities	Reduce the number of unhoused individuals in need of food and temporary housing, a shower and support services.
7	Project Name	Homeless Shelter, Soup Kitchen Services
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Homeless Strategy
	Funding	CDBG: \$15,000
	Description	The Beth El Center operates a soup kitchen to feed the homeless persons, or those at risk. The Kitchen Coordinator manages volunteers to prepare and serve 'to go dinners 7 days a week.
	Target Date	9/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 260 individuals
	Location Description	90 New Haven Ave, Milford CT 06460
	Planned Activities	The Kitchen Coordinator manages volunteers to prepare and serve 'to go dinners 7 days a week.
8	Project Name	Services for Victims of Violence: Domestic, Dating, Sexual Assault, Stalking
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$3,500
	Description	Rape Crisis Center trains 24/7 hotline operators to offer support and advocate for victims of sexual assault, and community education and public information classes to the public.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimate number assisted is 75 individuals
	Location Description	70 West River Street, Milford CT 06460
	Planned Activities	24/7 hotline operators to offer support and advocate for victims of sexual assault
9	Project Name	Public Facility Improvement, ADA Curb & Sidewalk Program
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Other Special Needs Strategy
	Funding	CDBG: \$50,261
	Description	Milford Public Works Department receives an annual grant to grade sidewalks to install ADA compliant curb cuts to improve safety for disabled persons & pedestrians.

	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The activity will assist an estimated 5,593 disabled individuals and the general public.
	Location Description	City Wide
	Planned Activities	The activity installs ADA compliant curb cuts and grades sidewalk to improve pedestrian safety for disabled persons and the general public.
10	Project Name	Single Family Residential Repair Program
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$70,000
	Description	Single Family Program(s) energy efficient residential upgrades, repairs and install accessibility fixtures.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	4 households are expected to receive program assistance.
	Location Description	TBD. The program open application process allows eligible households to request assistance to make property improvements throughout the program year.
	Planned Activities	Single Family Program(s) energy efficient residential upgrades, repairs and install accessibility fixtures.
11	Project Name	Residential Repair Program, Administration
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$19,000

	Description	CDBG staff markets program, reviews applications, manages bid process and projects with assistance of a project manager, and conducts lead based paint inspections and testing.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program generally receives up to 25 inquiries and 5 applicants per year.
	Location Description	TBD. The program open application process allows eligible households to request assistance to make property improvements throughout the program year.
	Planned Activities	CDBG staff markets program, reviews applications, manages bid process and projects with assistance of a project manager, and conducts lead based paint inspections and testing.
12	Project Name	Multi-Family Residential Housing Repair Program
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$75,000
	Description	Multi-Family Housing Residential Repair Program assist property owners make substantial repairs in exchange for an affordable monthly rent (SMI or FMR) to tenants who meet the HUD 80% area median income
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program expects an owner or non-owner occupied applicant to request assistance to improve a rental property for up to 2 income eligible tenant households.
	Location Description	
	Planned Activities	The housing program assists property owners make substantial repairs in exchange for an affordable monthly rent (SMI or FMR) to tenants who meet the HUD 80% area median income .
	Project Name	Homeownership Assistance

13	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$60,000
	Description	CDBG Staff market program, verifies applicant eligibility, works with mortgage lender, buyer, and buyer attorney to meet program and lender requirements, submits financial request, and secures the CDBG loan prior to the closing.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program generally receives 5 inquiries per year, 2 applications and assists 1 buyer every 2 years.
	Location Description	TBD. The program is an open process and applications are accepted from buyers throughout the year.
	Planned Activities	The program provides financial assistance to income eligible buyers to purchase a home in Milford. Technical assistance includes working with the buyer via informational correspondence with the first mortgage lender and attorney to receive documentation necessary to issue and secure a CDBG loan prior to the closing.
14	Project Name	Public Housing Modernization
	Target Area	
	Goals Supported	
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$90,000
	Description	The Milford Redevelopment & Housing Partnership applies to the CDBG program for the purpose of modernizing senior or disabled housing units in one or more State or Federally subsidized rental housing complexes owned and operated by MRHP.
	Target Date	9/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	CDBG funding for up to 25 housing units. MRHP's overall project cost will encompass improvements to all units at both complexes.
	Location Description	Improvements will take place at Catherine McKeen and Alan Jepson housing complexes.
	Planned Activities	The Milford Redevelopment & Housing Partnership applies to the CDBG program for the purpose of modernizing senior or disabled housing units in one or more State or Federally subsidized rental housing complexes owned and operated by MRHP.
15	Project Name	Program Administration & Planning
	Target Area	
	Goals Supported	
	Needs Addressed	Administration, Planning, and Management Strategy
	Funding	CDBG: \$112,000
	Description	CDBG Staff plans, financial manages, supervises, hires, and provides technical assistance to the public, local agencies, city officials and grant subrecipients throughout the year.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 150 people receive technical assistance from the CDBG staff a year, including grant subrecipients.
	Location Description	ECD, 70 West River Street, Milford CT
	Planned Activities	

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 identifies ADA accessibility to public facilities as a priority for CDBG funding. The adding accessibility to city owned facilities and non-profit agencies located throughout the city are based on need not a target area. Eligibility is determined on the facility clients, a service area and/or a low- and moderate-income census tracts(s) and block group(s).

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 and has no census tract/block groups where 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."

Milford does not designate a geographical target area for long term CDBG investment since none of its census tracts and block groups exceed a 51% concentration of low-moderate income households. In addition, the percentage of L/M households varies by census tract and block groups change every 3-5 years. In general, the greatest concentration of low to moderate income households are located on the west side of Milford. Milford's L/M map by census tracts and block groups, minority concentration, housing and low/moderate income concentrations are available for review on the ECD website. <https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-annual-grant-reports-application-process-public>

Discussion

On Milford's west side the neighborhood residential zoning lot sizes range from (R-10) 10,000 square feet/.23 acre and (R-5) 5,000 square feet/.11 acres. The lots are primarily R-5 and R-7.5 (less a ¼ acre) creating housing density, smaller homes, and lower property values. For shoreline areas of town consist of single-family homes but the majority of the rental apartment complexes, and public housing, are located on the west side of Milford. The City of Milford has invested funds to improve streets and sidewalks, install public parking meters in the area Walnut Beach.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The CDBG funding can be allocated to acquire existing property, demolition of property, and a variety of infrastructure improvements with the purpose of creating affordable housing to rent or own. A partnership between a non-profit and a Community Based Development Organization (CBDO) allows more local involvement in creating new housing stock for households looking to downsize or to buy their first home. CDBG financial assistance for housing is allocated so income eligible residents can make home repairs, new homebuyers, toward rent and mortgage payments, and security deposit for someone relocating to or within Milford. Currently the high rate of lease non-renewal and eviction is increasing housing insecurity for low and moderate income household(s). By July 1, 2023, the State of Connecticut require all towns with a population of more than 25,000 to create a fair rent commission to address tenant and landlord disputes.

A 2020 CDBG survey highlighted a need for housing choices to allow low and middle and fixed income households to buy, rent or downsize and stay in town. An increase in the variety of housing stock to include multi-family, duplex and single level homes with accessibility features are particularly needed in areas north of the Boston Post Road in Milford where there is land to build new “Pocket neighborhoods.” In addition, permanent supportive housing for chronically homeless individuals and veterans is vital to a person’s overall mental health and sense of dignity. In many cases, the stability of housing is proven to allow individuals time to rebound and end the occurrence of homelessness.

Like many towns in Connecticut, the City faces a shortage of affordable housing stock. Most economists agree that to meet demand the supply of housing must increase, and this will effectively bring down market rental and purchase prices. Some solutions include: modifying existing zoning rules to allow small builders and owners more flexibility to construct new types of housing including Accessory Dwelling Unit (ADU), single level homes; institute inclusionary zoning for projects 10 units or more; City tax incentives; support partnerships between CDBG, for-profit and non-profit housing developer interested in buying and preserve existing single family and multi-family homes, affordable deed restricted owner units, create mixed-use housing development using existing retail/commercial space located along transportation corridors, and target subsidies such as downpayment, mortgage and rental assistance to further decrease housing costs for income eligible household(s). Demolition is an eligible use of CDBG funds if building a new home is simpler than remodeling old housing stock. New construction will increase tax revenue but with non-profit involvement the total cost to an income owner can be lower, and in the long term, a newer home reduces maintenance costs and offers generational wealth.

The City of Milford’s four-year Affordable Housing Moratorium ends August 2023. Preserving existing deed restricted affordable homeownership units should be explored through a tax rebate and CDBG funding for home improvements may incentivize owners to agree to extend the affordable deed restriction on units for five to 10 years. Discussing the option before the original deed expires is vital

and would result in a benefit to both the city and the unit owners.

With assistance from the South Central Regional Council of Governments (SCRCOG) the city prepared its first Affordable Housing Plan on May 1, 2022, as mandated by the State of Connecticut Department of Housing. The plan, co-authored by the city, outlines goals and strategies to encourage capacity building to reach the state's mandated 10% affordable housing requirement. The plan offers areas where affordable housing strategies are likely to succeed. Based on data on demographic, income, and housing market conditions the plan provides the reader with reasonable assumptions and factual statements as to why affordable housing is necessary. The majority of Milford's existing housing stock is 50+ years old, if owners cannot find a house to relocate to, owners cannot realize the value of the property and downsize or relocate. Without property turn over, demolition, new construction or renovation of existing housing is slow to occur and tax revenue stagnates.

Milford's cost-of-living index is 129, Connecticut's COL is 127 and the nation COL is 100. The cost-of-living index is comprised of consumer categories. In Milford, the COL by category is 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. This data was released from [C2ER](http://www.areavibes.com/milford-ct/cost-of-living) in January 2022; this is the most current data available. www.areavibes.com/milford-ct/cost-of-living.

One Year Goals for the Number of Households to be Supported	
Homeless	480
Non-Homeless	612
Special-Needs	5,593
Total	6,685

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	16
The Production of New Units	0
Rehab of Existing Units	4
Acquisition of Existing Units	0
Total	20

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

Discussion

Opponents of affordable housing claim that increased housing density will change the character of the town and argue the State of CT is interfering with local zoning control by requiring boards to adopt or "opt out" of State zoning laws regulations deemed necessary to increase housing builds and affordability. In fact, local zoning board mandates a minimum lot size and height by zoning district, and require a public hearing if a zoning application requests a variance approval. This is government interference. Worse, it stymies "free market" the basis of capitalism, it artificially increases property values which benefits a town's tax base but negatively impacts an owners ability to sell and relocate,

improving housing stock, and home builders, big and small, from employing and making a living in construction.

From a fair housing standpoint, actively including not excluding households promotes acceptance. Most residents know where the high-density neighborhoods are in a town. Minimum zoning lot sizes in these areas are as small as .11 acre (R-5) therefore the homes are an avg of 900-1300 sq.ft and less expensive in comparison to districts with .41 to 1.0 acres. This practice has had the historic effect of separating the “haves from the have-nots”, increasing the financial and racial divide, segregating households to certain neighborhoods, and reducing the opportunity of interaction in a town and city.

Similarly, the HUD Fair Housing slogan “The zip code in which we live should not define us” speaks to segregation between urban and suburban communities. Where there is little opportunity for obtain a better education, benefit from financial stability and equity is out of reach for generations of families. To understand the consequence of displaced communities and the benefits of housing read American Progress, 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/>

AP-60 Public Housing – 91.220(h)

Introduction

The Milford Redevelopment & Housing Partnership (MRHP) is a public housing agency located in Milford, CT. It owns and manages six (6) rental complexes totaling 330 affordable rental units. MRHP administers 266 Housing Vouchers of which 225 were assigned as of 2020. Milford Redevelopment and Housing Partnership units are split into 55% public housing and 45% housing vouchers. Milford Redevelopment and Housing Partnership has a larger proportion of public housing units than the average housing authority. MRHP's proportion of Housing Vouchers is smaller than the average housing authority in Connecticut (Source United States Department of Housing and Urban Development hud.gov, 2014). MRHP contracts the management of their HCV program to Imagineers, LLC. and currently does not participate in the HVC Homeownership Program.

Actions planned during the next year to address the needs to public housing.

The Milford Redevelopment & Housing Partnership is a valuable housing resource, and it often requests CDBG funds to modernize the units it manages to house very low and extremely low households.

The CDBG Administrator will continue to recommend MRHP promote the CDBG Residential Housing Repair Program to HCV landlords as well as existing MRHP scattered site rental properties, form a non-profit arm to partner in the development of housing, with accessibility features, and two bedrooms to accommodate small families and households with in-home care nurse or family care-takers, incorporating a Envision Center or aspects of the program at its Viscount Drive complex; offer free broadband wiring and connection for residents (2020-2024 Five Year Strategic Plan, 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 for distribution. The CDBG Administrator recommends MRHP) offer the Housing Choice Voucher (HVC) Homeownership Program to tenants with an active Housing Choice Voucher. The opportunity to buy a home combined with financial assistance through the CDBG Homeownership program can only happen if it is offered.

https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/homeownership

The CDBG Administrator notifies MRHP appointed and resident Board Members of public hearings and comment periods. The MRHP Director reports that the management holds meetings with tenants every six weeks to discuss new ideas and concerns in community rooms at each complex. Dates, times, locations, or meeting outcomes are not disclosed or published to the public.

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 responds to all questions concerning landlord/tenant issues. No MRHP residents contacted the CDBG Administrator in 2022. The MRHP is cooperative for the most part with the ECD office. The CDBG Administrator completes MRHP project environmental reviews when requested, is willing to partner with MRHP to share the cost of preparing an Affirmatively Furthering Fair Housing (AFFH) report, requests a full copy of the MRHP Annual Plan prior to certifying it meets the Milford Consolidated Plan for the Mayor's signature, and request MRHP email a copy of the MRHP housing application to the ECD each year it is published.

Recently MRHP created a webpage <https://www.mrhp.org/> for public use. The CDBG Administrator and the City and the public can easily reference programs, housing locations, and the Housing Choice Voucher (HVC) program managed by Imagineers LLC. contact. https://www.imagineersllc.com/program_management.asp

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

Introduction

The CT Coordinated Access Network (CAN) <https://cceh.org/work/coordinated-access/> is tasked to develop a comprehensive process to streamline the “in-take” for individuals and families experiencing homelessness to access their housing in their community. CAN resource system connects individuals with service specialists who use the system to assess the needs of an individual provide services efficiently and effectively and rehouse individuals. 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 works directly with CAN support services to further stabilize an individual and attempt to address the root causes of 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.

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 homelessness 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.

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.

Addressing the emergency shelter and transitional housing needs of homeless persons

Beth-El owns and operates separate 90-day single dorm-style beds for men and women, as well as six rooms for families. Considering 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. In addition, an emergency shelter in the form of a “No Freeze” shelter operates when temperatures are at or below 32 degrees.

Between January 1, 2021, and December 31, 2021, 339 of the 1,236 individuals seeking assistance from CAN were women. Domestic violence survivors in the area are encouraged to seek help from BHCare Inc., a Center for Domestic Violence serving the Greater New Haven area. There remains a need for transitional housing and safe homes for victims of violence.

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

A housing shortage has increased the risk of homelessness for individuals and families living at extremely low and low income levels. CAN Housing Specialists work with Beth El to develop relationships with property owners to house formerly homeless persons and keep them sheltered. The unsheltered PIT count, 2,594 people experienced homelessness in January 2021. A 10.7% decline compared to the previous year's data. The Connecticut 2021 Point-in-Time Count report can be found at this link <https://cceh.org/pit/overview/>

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 and the CDBG program support the efforts of local agencies to assist families and individuals secure housing, help with financial literacy, counseling, emergency rent/mortgage or utility payments, job training, and security deposit to provide the best opportunity to remain self-sufficient and decrease the risk of homelessness.

Discussion

The City of Milford, the Department of Human Services, the Health Department and City Departments including the Police Safety Patrol Department work with the Beth El Center, to form the HUMAN

Network an advocacy group to end homelessness together with volunteers from the CT State Department of Social Services and the CT Coalition to End Homelessness and support service agencies such as TEAM and Bridges Healthcare.

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

Introduction:

Both renters and new buyers can face discrimination by real estate brokers, lenders, and property owners. Many federal agencies and state governments seek to educate and prevent housing discrimination through the Fair Housing Act and offering housing counseling to improve credit ratings and financial literacy. Barriers can prevent households from shifting away from renting to consider buying a home. Preserving a percentage of housing stock by zoning can create access to decent affordable housing throughout a town. The Connecticut State Statute 8-30g Affordable Housing law allows developers to circumvent local zoning laws and build affordable housing, but it does not restrict a development by location. A 2022 the State law required towns to adopt, or publicly opt out of, the Accessory Dwelling Unit (ADU). Non-profit housing advocates continue to seek to change residential zoning laws that restrict multi-family housing types in favor of single family homes. The City's 2020 Analysis of Impediments to Fair Housing Choice identified the impediments to affordable housing, along with the goals and strategies to address those impediments some of which are included herein.

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.

In 2022, the City of Milford updated its existing Accessory Apartment zoning requirements to allow an owner to rent to a person who is not a relative. An honest conversation on how to update the regulation was conducted over a period of six months. The regulation does not allow for a separate egress to/from the "apartment" or to be detached from the homes interior. Residents complained of added traffic and parking issues during public comment, but the board did not vote to include any parking requirements in the existing accessory apartment regulation.

Overly restrictive Zoning regulations and anti-housing development have the effect of a government intervention of many types of development. Elected officials and residents against housing density in general appear to be in direct opposition to the concept of a free market economy. A grass roots /community groups All In For Milford are leading the conversation about the benefit of housing variety for "empty-nesters," the elderly/disabled, young professionals and essential workers.

The federal government contributed to the structural inequality that perpetuated racist housing policy, disinvestment, and led to a historic pattern of disparity and segregation in housing. While the proposed AFFH mandate may simplify fair housing analysis and erase residential segregation, it is an unfunded mandate to States and towns to enforce and expand housing opportunity low income households and people of color. The federal government can help to rectify historic disparities in several ways; restructure federal loan terms and fees; required PHA's to adopt the Housing Choice Voucher Homeownership Program; offer HUD homes to the town specifically for rehabilitation and purchase by income eligible households.

Locally towns can offer tax incentives to preserve deed restrictions on affordable ownership units by extending deeds; further amend zoning regulations to include detached ADU units; promote non-profit

housing development partnerships; zoning amendments to preserve multifamily housing units; adopt residential ADA accessibility fixtures as a standard in new construction; adopt Inclusionary Zoning for any new residential construction over 8 units; and adopt a new zoning application fee for the purpose of establishing a Housing Trust Fund managed by a town Affordable Housing Task Force for the purpose of creating new affordable housing for sale or rent.

Discussion:

CDBG Section 108 program is a loan program whereby a City can use its CDBG award to borrow against its CDBG award to build or renovate homes for rent or to sell. The program is available for public facilities as well, such as Beth El Center to expand its homelessness response services and house more individuals. The Milford public Housing Authority has the ability to form a not-for profit arm, the city should consider charging the Milford Housing Partnership Committee with addressing promoting affordable housing, a Community Based Development Organization (CBDO) can be formed to access CDBG funds for housing and economic development activities, and with the expertise of a non-profit housing developer state and federal financing and grants can be accessed to finance additional affordable housing in Milford and other CT towns.

AP-85 Other Actions – 91.220(k)

Introduction:

The Milford Plan and Zoning Board is in the process of preparing an updated Plan of Conservation and Development (POCD). Milford new POCD is expected to be finalized by July 2023. The 2012 POCD is available at <https://www.ci.milford.ct.us/planning-and-zoning/files/plan-of-conservation-development>.

Actions planned to address obstacles to meeting underserved needs.

Continued advocacy for preserving and creating new housing through all avenues discussed within this plan. HUD's FY2010-2015 Strategic Framework; Goals: Strengthen the nations housing market and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform to improve quality of life; build inclusive and sustainable communities free from discrimination; and transform the way HUD does business. https://www.hud.gov/program_offices/cfo/stratplan

Actions planned to foster and maintain affordable housing.

CT zoning boards laws can use the existing 8-30g regulations to structure the Affordable Plan approval, recording of deed restrictions and updates, and enforce the certification process by monitoring set-aside units are marketed correctly, and rented accordingly to income eligible tenants to hold 8-30g developers accountable. Continued CDBG funding of the Direct Homeownership Program and Residential Housing Repair Programs, Rental and Mortgage Assistance Program and Security Deposit Program.

Actions planned to reduce lead-based paint hazards.

Offer free LBP public information and Renovation, Repair and Painting Program (RRP) certification class to educate contractors, homeowners and tenants of 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.

Offer reimbursement to employers for job training services, advocate for job readiness instruction throughout secondary grades 6-12; and federally fund alternatives to collage such as certification courses, vocational school, job training, apprenticeship programs.

Actions planned to develop institutional structure.

Support residents who advocate for structural change, inclusivity, fair housing, and tenant landlord engagement program(s). The CDBG public participation process attempts to solicit and promote involvement from a wide range the residents throughout the program year.

Actions planned to enhance coordination between public and private housing and social

service agencies.

Milford CDBG administrator continues to attend the Milford Homeless Outreach Workgroup referred to now as HUMAN Network, C-Ride, and the Milford Social Service Network meetings, and advocates for less restrictive residential zoning regulations, and promotes housing choice. 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:

More often than not, program inquiries do not lead to assistance for several reasons not limited to: income verification process, loan results in a "lien" on the property, and residential repair bid process. Financial incentives to multi-family property owners have been offered for many years but has not been successful in creating any affordable units.

With the high market rate rent and potential home sale prices in Milford residents continue to show a general disinterest in the subject of housing affordability. Though the link between a strong local economy, affordability, and housing variety is undeniable, the political resolve does not exist to champion this message.

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
Total Program Income:	0

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.	80.00%

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 2023-2024.