

Consolidated Annual Performance and Evaluation Report (CAPER)
Community Development Block Grant
City of Milford, Connecticut
Program Year 44

October 1, 2018 to September 30, 2019

15-day Public Comment Period
December 5, 2019 – December 20, 2019

CAPER

Contents

The following CAPER and Narrative have been submitted electronically to the HUD eCon Planning Suite software in the Integrated Disbursement and Information System (IDIS).

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Introduction

CR-05 - Goals and Outcomes

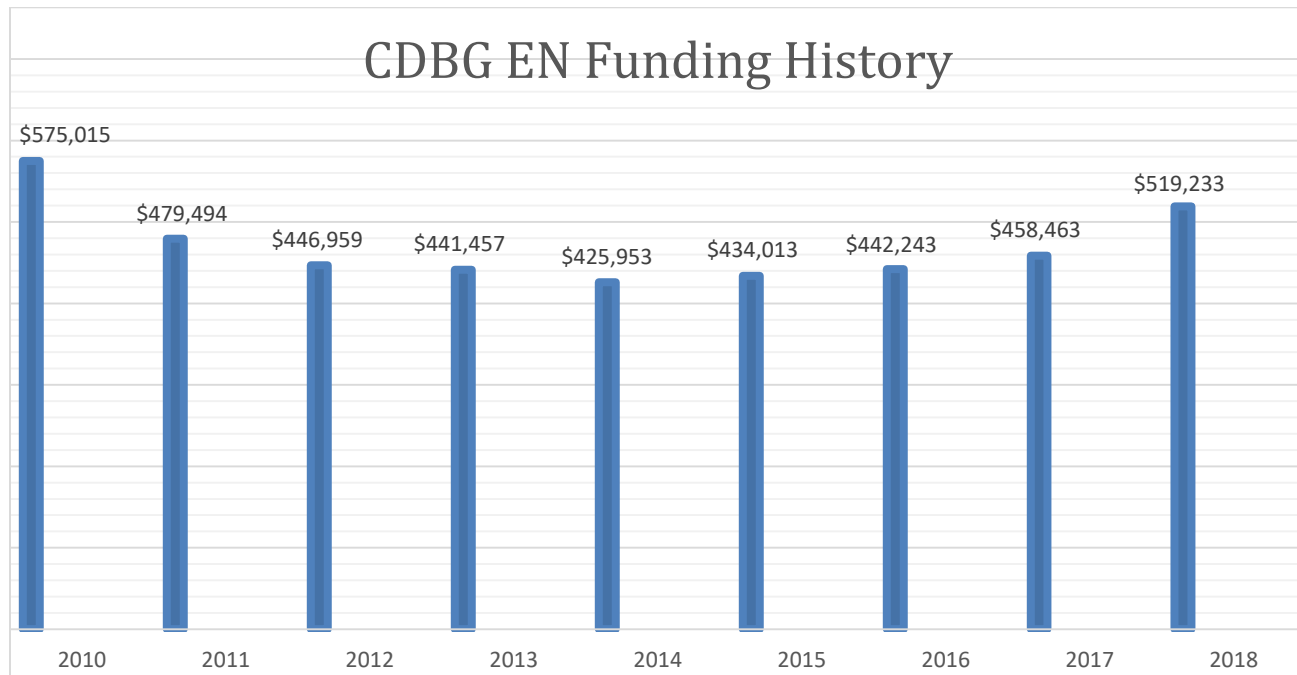
Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

Introduction and Financial Update

The City of Milford successfully completed its Program Year 44 allocating its 14% increase in 2018-19 CDBG Entitlement funds toward a Waste Water infrastructure improvement project to ensure its completion in 2019. The increase in the annual grant award is recognition of Milford's efforts to provide a comprehensive approach at the time of the NOFA to solicit grant applications and award funds to organizations with programs and projects that demonstrate both the capacity and capital planning necessary to deliver and achieve the best possible public benefit outcome for Milford residents and its local economy.

The Community Development Block Grant (CDBG) administered through the Department of Economic and Community Development (ECD) year had its share of successes and challenges. Additional funds and staff time were dedicated to assist the Milford Adult Education meet the demand for scholarships to enroll in job skill related classes, responding to an increased number of homeownership inquiries and application reviews which culminated in two (2) new Milford homeowners, assisting a private homeowner, under a court injunction, complete a complex LBP residential abatement and ensure the completion of the 2015 Waste Water infrastructure project in 2019. The successes, as well as the City's new financial system upgrade, preparation of a RFP to complete the 2020-2025 Five Year Consolidated and a Analysis of Impediments process and the Administrators new role in HUMAN Network Committee added many hours to the work load of a typical program year. The CDBG staff includes a full time administrator and a 20 hour Seasonal/Temporary Clerk. For the City to experience the full benefit of the grant a full time Clerk hired by the City is optimal to balance the administrative work to allow the Administrator more time to manage the grant, expand the residential repair program and work with the City to develop infrastructure and/or public facility projects. The CDBG Administrator will consider a candidate with both technical and computer experience and look to reduce the number of awards in the new program year to ensure the City continues to expend the grant in a timely manner.

In Program Year 44, October 1, 2018 and September 30, 2019, the City of Milford received from the Office of Housing and Urban Development an Entitlement Award of \$519,233 and received \$11,971 in Program Income (PI) revenue from housing program loan repayments during the same time period. On August 2, 2019 Milford reported a timeliness ratio of 1.04, well under the 1.50 maximum expenditure ratio. The IDIS report PR56 CDBG Timeliness Report and the PR26 PR26 Financial Summary Report provide evidence of the City strong compliance record.



Milford's Community Development Block Grant Award received 14% increase since 2014.

Comparison of the proposed versus actual outcomes submitted with the consolidated plan and why progress was or was not made toward meeting goals and objectives. 91.520(g).

Progress toward goals and outcome are presented in the CR-05 Table 1 clearly show Milford meets its overall goals and objectives which are to create and sustain a healthy livable environment, improve economic opportunity for residents and business, and community access for low to moderate income persons living at or below 80% median area income.

**CR-05 Table 1
Accomplishments In 2018-19 Program Year vs. Strategic Plan**

Goal	Category	Source Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$9,700	Human Services Rent/ Mortgage Assistance Program Public service activities	Persons Assisted	60	48		35	43	100%
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$125,000	Milford Housing Authority Rental units rehabilitated	Household Housing Unit	45	45	100%	24	24	100%
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$69,230	Homeowner Housing Rehabilitated	Household Housing Unit	5	6	120%	3	6	200%
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$0.00	Beth El Center Homeless Person Overnight Shelter	Persons Assisted	1000	1250	125%	200	248	124%
Improve & Increase affordable/ decent housing	Public Service Category	CDBG: \$11,700	Beth El Center No Freeze /Emergency Shelter/ Cots added	9 Beds	9	9	100%	9	9	100%
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$0.00	Housing for Homeless added	Household Housing Unit	0	0	0.00%	0	0	0.00%
Improve & Increase affordable/ decent housing	Affordable Housing	CDBG: \$0.00	Housing for People with HIV/AIDS added	Household Housing Unit	0	0	0.00%	0	0	0.00%
Neighborhood Improvement	Non-Housing Community Development	CDBG: \$174,000	Public Facility or Infrastructure Activities – Waste Water, Pump Station	Persons Assisted	6 facility projects	9962	166%	3 facility projects	9962	50%
Neighborhood Improvement	Non-Housing Community Development	CDBG: \$13,613	Public service activities – Child Care Center	Persons Assisted	550	431	78%	500	531	100%

Neighborhood Improvement	Non-Housing Community Development	CDBG: \$0.00	Economic Development - Façade treatment/ Commercial Property	Business	4	0	0.00%	1	0	68.83%
Strengthen Public Services	Non-Housing Community Development	CDBG: \$65,000	Public service activities - 11 Non-Profit SubRecipient Awards	Persons Assisted	600	413	69%	600	413	69%
Strengthen Public Services	Non-Housing Community Development	CDBG: \$1,440	Employment & Training Jobs created/retained - Milford Adult Education Program	Jobs	10	16	63%	10	16	160%
Strengthen Public Services	Non-Housing Community Development	CDBG: \$5,000	Business Assistance - Micro-Enterprise Program	Businesses Assisted	2	2	100%	1	2	100%

Overview of Proposed and Completed Initiatives during the Program Year

Affordable Housing
<i>Increase Housing Affordability / Reduce Housing Costs</i>
Rent and Mortgage Assistance Program
Elderly Services, Transportation
Milford Transit, Transportation
Administer Housing Financial Assistance Programs
Single Family Housing Repair Program
Multi-Family Housing Repair and Affordable Rent Program
Direct Homeownership Program
Advocate For New Affordable Homeownership and Rental Housing Opportunities
Milford Redevelopment & Housing Partnership
Supportive & Emergency Housing
BHCare, Shelter Victims of Domestic Violence
Beth-El Center, Homeless Shelter & No Freeze Shelter
Liberty Housing, Supportive Housing
<i>Improve Existing Housing Conditions / Create Decent Housing</i>
Milford Redevelopment & Housing Partnership
Administer Financial Assistance Programs
Single Family Housing Repair Program
Multi-Family Housing Repair and Affordable Rent Program
Direct Homeownership Program
Non-Housing Community Development
<i>Neighborhood Improvements – Public Facility and Infrastructure</i>
Milford DPW, Waste Water Pump Station, Flood Resiliency
Good Child Development Center, Early Child/Preschool Learning Equipment
Business Assistance Programs, Job Creation and/or Renton
Micro-Enterprise Assistance Program (MEAP)
Improve Accessibility for Disabled and Pedestrians
Milford DPW, ADA Sidewalk Improvements
<i>Strengthen Public Services</i>
Agency on Aging S.W.C.T., Caregiver Respite Companion
BHCare, Domestic Violence Services, Court Advocate

Beth-El Center, 90-Day Shelter & Soup Kitchen Services for homeless, or at-risk persons
Bridges Healthcare – Service Collaboration
Department of Human Services, Rent and Mortgage/Subsistence Payments
Rape Crisis Center, 24/7 Victim Hotline
Milford Adult Education Program, Job Training with Business or Career Class
Milford Senior Center, Transportation to Center
Milford Transit District, Transportation Town wide
Boys & Girls Club of Milford, Program Staff
Literacy Center of Milford, Program Staff

HOUSING COMMUNITY DEVELOPMENT

AFFORDABLE HOUSING CHOICE - The City of Milford CDBG housing repair programs support investment in existing housing stock and offer residents, renters and buyers an improved living environment or to the next owner moving to the Milford community. The CDBG housing programs are marketed in the Milford Community in a variety of ways including the City Website, a Press Release from the Mayor’s office, direct mailing of brochures and flyers and information boards or emails from agency and community partners. The staff received a high number of inquiries on the Homeownership program and two (2) households received assistance to purchase a home in Milford. During the 2018-19 program year the staff responded to many inquiries and applications for the Single Family Residential Housing Repair Program for repairs or maintenance but many owners were not eligible or did not want a second mortgage lien on their or their parent’s homes. The Multi-Family Residential Housing Repair Program has not been utilized by property owners. A new landlord engagement program outreach campaign is planned for 2020 by the HUMAN Network and Department of Human Services to enlist property owners to work more closely to house those in need in exchange for grants to improve the property. Also, it has been suggested that a community volunteers consider developing a committee for the purpose of creating a non-profit Community Development Corporation (CDC) to apply for private and public funds to purchase multi-family scattered housing with support services or meet other basic needs such as free visits to a laundry mat or a day facility offering showers and services. Additional program information, awards and accomplishment data on this year’s CDBG housing participants can be found in the attached IDIS report PR03.

Housing choices is in demand by retirees, new families and young professionals whose lifestyle, interest and income levels. It is equally important to maintain existing housing stock as it is to offer new mix income residential housing types and sizes for ownership and renters. Residential housing variety improves and integrates the neighborhood and does not decrease property values but rather, the increase in new and affordable units gives way for existing housing stock to be sold and improved, stimulating new tax revenue. The State of CT and private financial entities are structured to assist in the planning and development of housing, construction while the Community Development Block Grant substantial rehabilitation, land or building acquisition, demolition to create mixed-use commercial/housing properties or to support a CDC provide services and shelter in the community. The community reinvestment retains family connections to the community and economically supports small businesses who employ local labor.

HOUSING SERVICES – To meet a growing need a fair housing counseling program and security deposit programs will be sought for the 2020 application cycle. A housing counseling service will respond to inquiries and complaints related to fair housing and tenant landlord disputes, hold public educational presentations, offer training sessions to property managers to comply with the affordable housing rent and income requirements as stipulated by the 8-30g and HUD requirements. Displacement from area gentrification, evictions and fleeing domestic abuse circumstances in Milford and New Haven County have become more common and the reason a security deposit program will provide funds to a household on a referral basis through public service agency partners. Both of these programs promote HUD’s Affirmatively Furthering Fair Housing rule which is an invaluable guideline to prevent housing discrimination and fair housing complaints in the community.

The municipal Department of Human Service offers the Rent and Mortgage Payment Program for its third year and administers the CT Energy Assistance Program to help low income residents pay for winter heating costs. The HS staff counsels each household receiving services on how to budget for housing and living cost and guard against housing instability and food insecurity. Additional service program information, awards and accomplishment data for this year’s CDBG SubRecipients can be found in the attached IDIS report PR03.

PUBLIC HOUSING

Annually, funds are allocated to Milford Redevelopment Housing Partnership (MRHP) to modernize public housing complexes and improve conditions for the tenants. In 2018-19, funds were expended toward the renovation of bathrooms in 25 units of the total 45 units of the Catherine McKeen senior apartment complex. Additional program information, award and accomplishment data on this housing activity can be found in the attached IDIS report PR03.

NON-HOUSING COMMUNITY DEVELOPMENT

PUBLIC SERVICES – Annual municipal grants toward overhead costs for local agencies providing services to residents and specify community organizations with missions related to preservation of tradition. The CDBG public service budget category is capped at 15% of the total CDBG award that program year and are funds for specific services such as, salary toward the Beth El Center homeless shelter Soup Kitchen Coordinator and No-Freeze Emergency Shelter staff, Boys & Girls Club of Milford staff, Literacy Center tutors, transportation drivers to assist the elderly, a Domestic Violence Court Advocate, and scholarships from the Milford Adult Education program to attend career and job skill classes. Additional program information, awards and accomplishment data on this year's CDBG SubRecipients can be found in the attached IDIS report PR03.

PUBLIC FACILITY IMPROVEMENTS – Early in the program year Good Child Development Center expended its award to buy new playground equipment to update and improved the learning experience for its students attended its early childhood program. The City Public Works Department award for sidewalk improvement was reprogrammed to the Sewer Commission and Waste Water Division to complete the disaster mitigation project first funded in 2015. In August 2018 a consulting firm was hired to prepare engineering and design plans to improve a waste water pump station by elevating the generator and equipment located on Sailors Lane. The November 2018 bids were overbudget so funding from both the City and CDBG was necessary to award the lowest qualified bid. Contracts were signed March 2019 but the equipment wasn't delivered until September and the contractor broke ground on October 28, 2019. The project completion and inspection approval is anticipated by December 2019 weather permitting. The City's Department of Public Works is in the process of completing two out of five large CDBG-DR projects that will mitigate flooding along the Milford coast.

ECONOMIC DEVELOPMENT

The Director lends her support to City staff, ECD colleagues, local and regional business groups, non-profits and the arts community events and initiatives, find commercial space, pedestrian safety, and transit oriented development. The Director of the Department Economic and Community Development (ECD) together with the Economic Development Commission engaged the Small Business Development Center (SBDC) to vet small business applications for the Micro-Enterprise program with the goal to build sales capacity to the level necessary to receive federal funds to pay for a business and/or marketing plan, expand and/or relocate their business. Interest in the program has dwindled and the funds will be reprogrammed to a new commercial façade program or to the multi-family housing repair. CDBG funds have not been sought to form a Section 108 Loan Program for the purpose of economic development or to leverage other infrastructure investments to date. Detailed program data can be found in the attached IDIS report PR03.

In 2016 the City purchased a large commercial property containing small businesses and offices and completed a feasibility study. In 2018 the Board of Alderman did not approve the Transit Oriented Development Plan as recommended by the feasibility study to create a downtown transportation corridor development next to the Metro North train station with a parking garage and a mixed-use commercial space and housing and inclusionary zoning and pedestrian improvements.

In 2019 the Director of Department of Economic and Community Development (EDC) and the Director of Planning and Land Use received a Connecticut Economic Development Association (CEDAS) award for Best Practices in Economic Development and Land Use Planning. The CEDAS developed a certification program to encourage best practices in municipal economic development and land use to spur local and State development. The City's goal included a new electronic Building and Zoning Departments procedures to streamline the overall permit process for new, existing businesses and residents.

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Assessment of the Program Year

The 2018-19 Consolidated Annual Performance Report (CAPER) purpose is to assess annual progress made toward meeting the goals and objectives set in 2015-2020 Five-year Strategic Consolidated Plan and the Annual Action Plan as detailed in Table CR-05 and executed by the City's Department of Economic and Community Development (EDC).

In 2018-19 the City addressed the annual priorities and objectives and 71.69% of the population assisted directly or indirectly with CDBG funds were income eligible. Public services have some leeway to assist non-income eligible residents that present with an urgent with the understanding that the total low/moderate income participation level must remain at or above 70%. Public facility activity eligibility is calculated by HUD using census data mapped by census tract and block group. The formulated data is contained in the IDIS system to verify that public facility activity CT/BG is located in an area that does in fact contain at least 51% low/mod income households. Each Entitlement Community has a different percentage of low and moderate (LM) income households by census tracts and block groups. For Exception Grantee's such as Milford (program/acs-low-mod-summary-data-exception-grantees/) public

facility projects are eligible if the area meets or exceeds the upper quartile LM %. An upper quartile is captured using the highest ¼ low/mod income household % in each CT/BG. In 2019 Milford’s upper quartile is 35.7% LM, up from 32.7% in 2017. 100% of participants in the Milford Housing Programs meet income eligible guidelines for Milford.

According to IDIS report PR26 Financial Summary the Administrative and Public Service disbursement slightly exceeded the allowable regulatory cap percentages. According to PR03, PR05 and PR26 reports the PY44 Public Service disbursement of \$76,065 is under \$79,469 maximum PY44 15% cap allowed. The Planning and Administrative (PA) cap for PY44 is \$104,365.72. According to the PR03 and PR05 IDIS reports, \$78,411.76 in entitlement funds and \$1,971.34 in Program Income was disbursed in the program year. The City financial system confirms the total disbursements amount did not exceed either cap requirement. In addition, the final actual expenditures of encumbered Program Administration funds will be slightly less than reported in line 40, adjust in total PA obligations. An IDIS Financial Summary Report PR26 dated 9/30/19 is attached for review.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	1,251
Black or African American	319
Asian	47
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	20
Total	1,637
Hispanic	233
Not Hispanic	1,404

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The CR-10 Table reflects CDBG Subrecipient public service program accomplishment data on the racial and ethnic composition of Milford families assisted during the program year reported on a quarterly or monthly basis and entered into the Integrated Disbursement and Information System (IDIS). A complete list of activity accomplishments is found on the attached PR03 CDBG Activity Summary Report (GPR).

The Census Bureau format American Fact Finder included below is census data from the 2013-2017 American Community Survey (ACS). It estimates Milford’s population by ethnicity and housing during this time period. Additional Milford data can be found <https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. The 2014-2018 ACS Five-Year Estimates will be published November 2020.



DP05

ACS DEMOGRAPHIC AND HOUSING ESTIMATES

2013-2017 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

Subject	Milford city (balance), Connecticut			
	Estimate	Margin of Error	Percent	Percent Margin of Error
SEX AND AGE				
Total population	52,331	+/-218	52,331	(X)
Male	25,667	+/-615	48.0%	+/-1.2
Female	26,764	+/-654	51.1%	+/-1.2
Sex ratio (males per 100 females)	95.5	+/-4.6	(X)	(X)
Under 5 years	2,487	+/-308	4.8%	+/-0.6
5 to 9 years	2,507	+/-285	4.8%	+/-0.5
10 to 14 years	2,619	+/-294	5.0%	+/-0.6
15 to 19 years	2,830	+/-309	5.4%	+/-0.6
20 to 24 years	2,626	+/-380	5.0%	+/-0.7
25 to 34 years	7,035	+/-592	13.4%	+/-1.1
35 to 44 years	6,293	+/-449	12.0%	+/-0.9
45 to 54 years	8,192	+/-591	15.7%	+/-1.1
55 to 59 years	4,348	+/-449	8.3%	+/-0.8
60 to 64 years	3,910	+/-415	7.5%	+/-0.8
65 to 74 years	5,315	+/-451	10.2%	+/-0.9
75 to 84 years	2,654	+/-330	5.1%	+/-0.6
85 years and over	1,515	+/-292	2.9%	+/-0.6
Median age (years)	44.7	+/-1.0	(X)	(X)
Under 18 years	9,489	+/-419	18.1%	+/-0.8
16 years and over	44,279	+/-438	84.6%	+/-0.8
18 years and over	42,842	+/-426	81.0%	+/-0.8
21 years and over	41,514	+/-461	79.3%	+/-0.9
62 years and over	11,866	+/-569	22.7%	+/-1.1
65 years and over	9,484	+/-512	18.1%	+/-1.0
18 years and over	42,842	+/-426	42,842	(X)
Male	20,391	+/-540	47.6%	+/-1.1
Female	22,451	+/-530	52.4%	+/-1.1
Sex ratio (males per 100 females)	90.8	+/-4.2	(X)	(X)

Subject	Milford city (balance), Connecticut			
	Estimate	Margin of Error	Percent	Percent Margin of Error
65 years and over	9,484	+/-512	9,484	(X)
Male	3,817	+/-261	40.2%	+/-2.2
Female	5,667	+/-399	59.8%	+/-2.2
Sex ratio (males per 100 females)	67.4	+/-6.1	(X)	(X)
RACE				
Total population	52,331	+/-218	52,331	(X)
One race	51,479	+/-358	98.4%	+/-0.5
Two or more races	852	+/-264	1.6%	+/-0.5
One race	51,479	+/-358	98.4%	+/-0.5
White	46,419	+/-754	88.7%	+/-1.3
Black or African American	1,685	+/-494	3.2%	+/-0.9
American Indian and Alaska Native	23	+/-34	0.0%	+/-0.1
Cherokee tribal grouping	17	+/-27	0.0%	+/-0.1
Chippewa tribal grouping	0	+/-28	0.0%	+/-0.1
Navajo tribal grouping	0	+/-28	0.0%	+/-0.1
Sioux tribal grouping	0	+/-28	0.0%	+/-0.1
Asian	2,804	+/-463	5.4%	+/-0.9
Asian Indian	1,636	+/-425	3.1%	+/-0.8
Chinese	414	+/-183	0.8%	+/-0.3
Filipino	277	+/-179	0.5%	+/-0.3
Japanese	19	+/-30	0.0%	+/-0.1
Korean	105	+/-63	0.2%	+/-0.1
Vietnamese	133	+/-113	0.3%	+/-0.2
Other Asian	220	+/-120	0.4%	+/-0.2
Native Hawaiian and Other Pacific Islander	0	+/-28	0.0%	+/-0.1
Native Hawaiian	0	+/-28	0.0%	+/-0.1
Guamanian or Chamorro	0	+/-28	0.0%	+/-0.1
Samoan	0	+/-28	0.0%	+/-0.1
Other Pacific Islander	0	+/-28	0.0%	+/-0.1
Some other race	548	+/-236	1.0%	+/-0.5
Two or more races	852	+/-264	1.6%	+/-0.5
White and Black or African American	232	+/-161	0.4%	+/-0.3
White and American Indian and Alaska Native	142	+/-126	0.3%	+/-0.2
White and Asian	275	+/-107	0.5%	+/-0.2
Black or African American and American Indian and Alaska Native	0	+/-28	0.0%	+/-0.1
Race alone or in combination with one or more other races				
Total population	52,331	+/-218	52,331	(X)
White	47,230	+/-720	90.3%	+/-1.2
Black or African American	1,983	+/-524	3.8%	+/-1.0
American Indian and Alaska Native	232	+/-151	0.4%	+/-0.3
Asian	3,193	+/-483	6.1%	+/-0.9
Native Hawaiian and Other Pacific Islander	18	+/-21	0.0%	+/-0.1
Some other race	639	+/-245	1.2%	+/-0.5
HISPANIC OR LATINO AND RACE				
Total population	52,331	+/-218	52,331	(X)
Hispanic or Latino (of any race)	3,553	+/-585	6.8%	+/-1.1
Mexican	496	+/-313	0.9%	+/-0.6
Puerto Rican	1,364	+/-415	2.6%	+/-0.8
Cuban	208	+/-135	0.4%	+/-0.3
Other Hispanic or Latino	1,485	+/-442	2.8%	+/-0.8
Not Hispanic or Latino	48,778	+/-601	93.2%	+/-1.1
White alone	43,616	+/-861	83.3%	+/-1.6
Black or African American alone	1,535	+/-460	2.9%	+/-0.9
American Indian and Alaska Native alone	6	+/-11	0.0%	+/-0.1

Subject	Milford city (balance), Connecticut			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Asian alone	2,804	+/-463	5.4%	+/-0.9
Native Hawaiian and Other Pacific Islander alone	0	+/-28	0.0%	+/-0.1
Some other race alone	92	+/-107	0.2%	+/-0.2
Two or more races	725	+/-227	1.4%	+/-0.4
Two races including Some other race	54	+/-50	0.1%	+/-0.1
Two races excluding Some other race, and Three or more races	671	+/-219	1.3%	+/-0.4
Total housing units	22,780	+/-492	(X)	(X)
CITIZEN, VOTING AGE POPULATION				
Citizen, 18 and over population	40,489	+/-565	40,489	(X)
Male	19,152	+/-577	47.3%	+/-1.3
Female	21,337	+/-585	52.7%	+/-1.3

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

For more information on understanding race and Hispanic origin data, please see the Census 2010 Brief entitled, Overview of Race and Hispanic Origin: 2010, issued March 2011. (pdf format)

While the 2013-2017 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Explanation of Symbols:

1. An "" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An ' ' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An ' ' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An ' ' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

Leveraging

Narrative

During the program year, a significant amount of collaborative community building and technical assistance is provided by the Department of Economic and Development Director, her staff and the CDBG Administrator. The support is an effort to leverage access to municipal and professional resources and information benefit and grow the capacity of small businesses and non-profit organizations, improve planning to complete improvements in City infrastructure, public facilities and services in the City of Milford.

In a coastal town such as the City of Milford a Hazard Mitigation Plan is prepared by a Committee of knowledgeable City staff to ensure the City is prepared for a flood emergency and eligible for federal emergency management assistance (FEMA) to assist residents and the City repair and mitigate flooding of essential infrastructure and emergency services.

Leveraging Resources and Investments

Federal funds can leverage additional resources (private, state and local funds) with and without satisfying a matching requirement. Publicly owned land or property located within the jurisdiction can be used to address the needs identified in the plan.

2018-19 Milford's leveraged municipal resources and investments in 2018:		
Beaver Brook Trail/Open Space	390,000	Federal/CT-DEEP/CT-OPM STEAP Grant
Waste Water Sewer Improvements	238,700	Municipal/Federal
Milford Redevelopment Housing Partnership	1,300,000	Federal/State Funding
Infrastructure Resiliency/Storm Mitigation	5,266,000	CT-DECD/CDBG-DR
Milford Grants	<u>3,110,079</u>	Municipal
Total	10,304,779	

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	519,233	454,523

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
No Specific Geographic Area Specified	80	88	Public Facilities

Table 4 – Identify the geographic distribution and location of investments

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	202	151
Number of Non-Homeless households to be provided affordable housing units	10	10
Number of Special-Needs households to be provided affordable housing units	5	3
Total	217	164

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	8	35
Number of households supported through The Production of New Units	2	2
Number of households supported through Rehab of Existing Units	29	28
Number of households supported through Acquisition of Existing Units	2	0
Total	41	65

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Table 5 greatly overstates the number of unit goal. It is an error in activity national objective or an IDIS software glitch.

In 2019 the City submitted a second request to the CT State Department of Housing to certify 10% of Milford's housing stock was deed restricted for an estimated 468.25 Housing Unit Equivalent (HUE) Points and 591 total units. On August 19, 2019 the State of CT certified a 4 year moratorium from 8-30g projects effective until August 20, 2023, and it's eligibility to receive an extension to August 20, 2028 with proof of the 10% affordability. Milford will prepare an affordable housing plan by 2023 stating what methods it will use maintain its 10% affordable housing quota. Some recommendations include: appointing local housing advocates, officials, developers and business owners to form a Housing Partnership Committee; explore new design and density zoning initiatives to encourage multi-unit housing that preserves a similar residential façade and height by neighborhood; incentivize housing improvements of multi-family housing stock to preserve existing housing and encourage new development; allow existing owners to create accessory apartments or subdivide and modify a residents over 3,000 sq ft located in 2+ acre zoning and remain on the property as a landlord or co-owner. Parking spaces and set back must be flexible; a zoning application development fee required under 10 units to fund a Housing Trust the Committee can utilize to

plan, assist in acquiring a multi-family property or remodel to create scattered-site affordable housing with a non-profit housing development organization for resale or as temporary housing during LBP Abatement project or elevation of an income eligible homeowner; adopt inclusionary zoning and require developers building 9 or more residential housing units to rent or sell a minimum of 10% of the total units at affordable FMR to income eligible households; and solicit mixed-use housing and commercial development to increase the tax revenue base. A city that seeks to be inclusive through zoning that encompasses design and density elements will meet current and future residential lifestyle choices, demographics and the economy.

A city must advocate and educate the community to the economic advantages of developing mix income housing. A affordable housing plan will detail the value of partnering with a housing non-profit firm to acquire and develop housing that meets the needs and suits the neighborhood. Housing choice are sought by empty nester looking to downsize, young professionals, and seniors who want to stay in the community but do not want the burden of a single family property. Local property management and developers include Mutual Housing/New Horizons who manage rentals for young professionals or supportive housing, the Corporation of Independent Living, or a Kennedy Center to build housing for special needs persons. Including CDBG gap financing to complete the municipal/non-profit developer project will ensure future affordability to income eligible owner or renter.

To assist the Milford City Planner, the ECD CDBG Administrator is tasked with reviewing and approving 8-30g Affordable Housing and Fair Housing Plan for each applicant. To ensure a “set aside” affordable unit is always made available to the intended income eligible household a boilerplate Plan was instituted with statute requirements and a rent/income calculator containing the current annual FMR data, HUD/SMI Income guidelines to correctly calculate the actual rental/resale by unit size. This information and more is available to the public, interested parties and property managers on the ECD webpage of the City of Milford website.

The 8-30g Restrictive Deed/Covenant must contain the require restrictive requirements, including the annual unit certification by each property manager. A city must review each certification and can monitor records to enforce compliance to the income eligibility of the set-aside units. This ensures clear and concise information for the public, a new property owner understands their responsibilities, and it acts as security for both city officials who are responsible for managing the the affordability aspect.

Construction of affordable housing units can include a formal process notify all City departments of application approvals, permit to construct beginning, advertise to the public and date of set-aside unit completion. The Milford Department of Planning & Land Use (DPLU) instituted several new 8-30g applicant requirements: Developers must first build a set-aside unit and record a 40 year deed restriction before the City Building Department will issue a building permit for a market rate unit. A City that adopts these at minimum will meet its social responsibility.

The Milford Human Services administers the Subsistence Program (Rental & Mortgage Assistance Program) and exceeded its goal to stabilize Milford households for a third year. The Corporation for Independent Living (CIL) completed one (1) residential ADA accessibility project in Milford using Single Family Housing program funds but did not elect to accept additional funds. The CDBG staff managed Single Family and Multi-Family residential housing repair program(s) but did not assist the three (3) households as is typical but did assist two (2) buyers to purchase a home in Milford.

Integrating ADA accessibility into sidewalk improvements provides large public benefit as it creates safety for the elderly and disabled and a pedestrian friendly town. Funds are allocated annually to modify curb cuts, sidewalk grading, repair and extended sidewalks to create safer pedestrian travel throughout the community. ADA modifications to both public and residential structures create spaces for persons with disabilities.

To continue to expend CDBG funds on a timely basis and continue to offer the housing repair assistance program it is essential to employ a full time CDBG assistant and/or project manager. To continue to expend CDBG funds on a timely basis and continue to offer the housing repair assistance program it is essential to employ a full time CDBG assistant and/or project manager. This will allow the Grant Administrator the necessary time to solicit, develop and coordinate a landlord engagement program, and assist the City develop an affordable housing plan.

Discuss how these outcomes will impact future annual action plans.

The CDBG Administrator encourages partnership between the Milford Redevelopment & Housing Partnership and Beth El Center to organize a housing advocacy committee and form a not-for-profit Community Development Corporation (CDC). A CDC can apply for private and public funds for support services and to develop different types of housing for mix income households and to end homelessness. Efforts to finance a security deposit program and landlord engagement program will stabilize housing costs for low and moderate income households who are unable to find decent housing at an affordable cost to their family. Support for mix income housing promotes economic sustainability and creates an inclusive environment where good schools offer the opportunity for improved life outcomes.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	428	0
Low-income	1002	0
Moderate-income	161	0
Total	1,591	0

Table 7 – Number of Households Served

Narrative Information

Connecticut has the ninth highest cost of living index by State in the Nation (World Population Review) and an average cost of a home is \$243,700 ranking 19th in the country. According to the 2013-2017 ACS estimate 6.1% of the 52,331 Milford residents live in poverty compared to 12.1% poverty rate in New Haven County; 10.1% in the State of Connecticut; and a national poverty rate is 14.6%. In Connecticut a household of 4 with an income of \$25,750 meets the 2019 poverty guidelines.

“In Connecticut, 1-in-4 households have earnings that exceed the Federal Poverty Level (FPL) but fall short of a basic cost of living threshold. We call these households ALICE—an acronym for Asset Limited, Income Constrained, Employed, and together with the 10% of Connecticut households in poverty, more than one-third of Connecticut households (35%) are struggling to make ends meet”. Visit <http://alice.ctunitedway.org>.

The United Way of Connecticut 2018 ALICE report defines a Survival Budget as including a conservative monthly budget for the six basic necessities – Housing, Child Care, Food, Transportation, Technology (the cost of a smartphone) and Health Care with no money for savings or emergency expenses.

1. A household of one paid \$12.34 an hour (35 hrs wk) earns \$22,458 a year is considered extremely low income or 30% of Milford’s median household income. The ALICE Survival budget for a single person is \$2,056 a month for basic monthly expenses or \$24,672 a year.
2. A household of four paid \$38.92 hr/35 hrs earns \$70,843 a year is considered below the 80% median income for Milford. The ALICE Survival budget for a family of 4 is \$6,486 a month for basic monthly expenses or \$77,832 a year.

Individuals and families living above poverty level are financially constrained by under-employed or unemployed, disability and/or are the elderly living on fixed incomes, with high health care bills and prescription costs or no health insurance and use the local hospital when in need, may not have reliable or any form of transportation. Income and housing insecurity greatly increases a household’s risk of becoming homeless. Creation of affordable scattered housing units, repairs and energy efficiency improvements reduce housing costs, rental or mortgage payment assistance, a rent security payment program, and job training are tangible services that help people to stabilize housing and cost of living and be more self-sufficient.

Due to lower interest rates throughout the entire program year, the First Time Homeownership program experience a sharp increase in inquiries, applications and successfully financially assisted two (2) eligible household with matching downpayment and funding toward originating closing costs.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Beth El Center is recognized as a substantial partner in the fight to end homelessness in Connecticut. The BEC staff provides comprehensive supportive services, emergency No-Freeze shelter, is a member of the Connecticut Coalition to End Homelessness (CCEH.org) system whose mission is to rapidly re-house persons and families.

Beth El Center staff participates in the Adult and Youth homeless Point in Time Count (PIT) sponsored by the Continuum of Care CT and administered by the Connecticut Coalition to End Homelessness. Counting the number of people living outside on a winter night has resulted in a new method for which to approach the campaign to end homelessness. "Only by knowing who, where, and how many people are homeless in Connecticut can we plan and identify the resources needed to best serve the most vulnerable, and ultimately move families and individuals into permanent housing."

In 2018 the City recognized and took steps to assess the needs of a growing population of unsheltered homeless persons in Milford. The Health Department, the Public Library and Beth El Center staff was at the forefront of forming a multi-agency team later to be named the HUMAN Network Committee. The committee instituted an outreach program to engage individuals at places of regular encampment and in public buildings where individuals are known to congregate to stay warm and off the street. An outreach table is now located at the Public Library to engage individuals and determine needs. These encounters are documented and discussed at the committee meeting, if a crisis arises, the committee receives an email update. The immediate goal is to create a comfort level and trust in order to identify by name as many people as possible, ascertain the person needs/wants, determine prior housing experiences, offer supportive services and try to house that person if possible. The new Beth El Center Director has just finished its Five Year Strategic Plan and will distribute it in December.

Addressing the emergency shelter and transitional housing needs of homeless persons

Beth El Center operates a 90-day shelter for men, women and families from the area and a soup kitchen, both located at 90 New Haven Avenue. The soup kitchen provides a mid-day meal and an evening packaged meal, and maintains a small non-perishable food bank in the soup kitchen area for households in an emergency. Beth El Center receives annual CDBG public service funds in support of these programs and funds to maintain or improve the shelter facility located at 90 New Haven Avenue. Beth El Center offers a temporary "No-Freeze" shelter in the soup kitchen dining room on nights the temperature is expected to drop to or below 32 degrees. In 2018-19 the emergency shelter exceeded its 8 cots limit several times. In 2019 Beth El Center is working to arrange added no-freeze volunteers from the St. George so to assist the BEC staff manage the overflow of guests expected again this year. Additional program accomplishment information is provided on the IDIS report PR03.

Since 2004 Beth El Center and Mutual Housing/New Horizons manage supportive housing property consisting of five (5) unit Liberty Housing on New Haven Avenue, Milford. In 2014 a second supportive housing venture together with funds and involvement from the Veteran's Administration, the Women's Institute for Housing and Economic Development, the Local Initiatives Support Corporation (LISC) and the City of Milford/CDBG sought to purchase an existing school property but the Hartford Diocese of the Catholic Church eventually declined to sell the land to the non-profit in 2016 and the project was canceled.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The CDBG Administrator encourages the Beth El Center Director and the Board of Directors to organize a housing advocacy committee and form a not-for-profit Community Development Corporation (CDC). A CDC can apply for private and public funds for support services and to develop different types of housing for mix income households and to end homelessness. In addition, the Administrator recommends the Beth El Board and the City's faith based community take part in stakeholder meetings to discuss impediments to mix income housing and brainstorm changes to the current zoning requirements to advocate for housing choice and variety that meet needs of the elderly, empty-nesters, working families, and young professionals while fitting within a neighborhood style.

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.

Milford Department of Health & Human Services does a good job of assisting residents who are housed services to stabilize monthly and provide budget counseling. The MHHs acknowledges that persons with chronic or occasional or reoccurring events of homelessness may not be aware of or have difficulty accessing existing services and therefore basic needs go unmet and the person remains unhoused and unable to lead a functional life. Early in 2019 committee later to be named the HUMAN Network was organized by homeless, health, housing and mental health advocates to perform outreach sessions in order to assess the needs of the growing homeless population in Milford. By spring 2019 the HUMAN Network Committee determined that the majority of homeless individuals it encountered during outreach sessions were not interested in services at that time and/or had not taken part in the Coordinate Access Network (CAN) intake process and therefore were not in the CAN database system. In the summer of 2019, the HUMAN Network formed two sub-committees, a Data Committee, to develop a survey to ascertain some personal history and what may have led to their homeless experience and get a true count of chronically homeless population in the region. And a Education Committee to explore public advocacy and work to restore personal dignity by offering basic needs and wants such as laundry, shower, transportation, housing.

The Milford Redevelopment and Housing Partnership (PHA), the Beth El Center and the Health Department keep an open line of communication and often resolve temporary shelter issues for displaced or homeless persons, disabled and elderly persons with medical necessities, and individuals with addiction or mental illness.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The MRHP submits an annual CDBG application to complete improvements at its housing properties. The bathroom modification project of 25 units at Catherine McKeen Apartments, a senior housing facility is half done and its expected completion date is June 2020. CDBG funds toward the Milford Redevelopment and Housing Partnership (MRHP) projects not only modernizes existing housing stock and overall living and health conditions of low income household(s) and the neighborhood as a whole, but it leverages federal and State-public housing funds.

The Milford Redevelopment and Housing Partnership, (MRHP) owns and manages six (6) rental complexes totaling 330 affordable rental units. MRHP administers 266 Housing Vouchers of which 225 are currently placed. Comparing the housing assistance distribution of Milford Redevelopment and Housing Partnership between Public Housing Units (55%) and Housing Vouchers (45%) to that of all housing authorities in Connecticut, Milford Redevelopment and Housing Partnership has a larger proportion of public housing units than the average housing authority. The housing authority's proportion of Housing Vouchers under management is smaller than the average housing authority in Connecticut. (*Source United States Department of Housing and Urban Development hud.gov, 2014*)

The MRHP reports the availability to advanced broadband internet technology is available throughout the PHA units for those who subscribe. In MRHP and the City will collaborate more specifically in 2020 to comply with the new

federal HUD broadband requirement to ensure each complex has access to computers in a community room. In 2016 the CT State Legislature recommended an upgrade and acceleration of affordable advanced broadband service and networks as stated in the *Connecticut Office of Consumer Counsel report on Broadband in Connecticut: Opportunities for State and Localities March 2016* in coordination with the Federal Communications Commission (FCC) common sense Technology Transition rules to balance residential and State objectives with the industry ability reasonably continue to maintain or complete the transition to fiber and reduce residential costs. In 2017 the Federal Communications Commission effectively stepped back from the Technology Transition rules which would benefit consumers of all ages, socio-economic and rural communities' transition to and access advanced communications technology services. The rule change in effect allowed internet providers to discontinue maintenance of landline (copper legacy networks) and gave no incentive to upgrade to fiber. The new ruling perpetuates economic slowdown, job creation and opportunity for citizens, especially in rural areas, where access to reliable internet connections and advanced internet technology promotes financial and employment opportunity, reliable information resources and even health care to low and moderate income households.

History: In 2008, the private and public sectors invested over \$260 billion in new broadband infrastructure, and 3 in 4 Americans now use broadband at home. Thanks to smart spectrum policies and world-leading technology, fast 4G wireless broadband is now available to over 98 percent of Americans — up from zero percent since 2009.” “Despite this progress, [a new analysis released](#) today by the President’s Council of Economic Advisers (CEA) illustrates that some Americans are still unable to benefit from high-speed broadband, especially [America’s lower-income children](#). In fact, while nearly two-thirds of households in the lowest-income quintile own a computer, less than half have a home internet subscription. While many middle-class U.S. students go home to Internet access, allowing them to do research, write papers, and communicate digitally with their teachers and other students, many lower-income children go unplugged every afternoon when school ends. This “homework gap” runs the risk of widening the achievement gap, denying hardworking students the benefit of a technology-enriched education. Building regional partnerships with private- and public-sector leaders will increase access to the Internet for low-income Americans. Mayors across the country have committed to reallocate local funds, leverage local programming, and use regulatory tools to support this initiative and the expansion of broadband access in low-income communities.” (HUD.gov and July 15, 2015 Whitehouse.gov/the-press-office). In 2015 President Obama made efforts to expand and provide all Americans with high speed internet service through ConnectHome “an initiative that is on track to connect 99 percent of K-12 students to high-speed Internet in their classrooms and libraries through 2020.

ConnectHome will help ensure students have continued access to high-speed Internet at school and home.

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

The Milford Redevelopment & Housing Partnership does not participate in the Quality Housing and Work Responsibility Act (QHWRA) effective April 2003, which permits PHAs, through Section 32 Homeownership programs continue to operate under the existing Section 5 (h) rule, 24 CFR 906 of the U.S. Housing Act of 1937, to make public housing dwelling units available for purchase by low-income families as their principal residence.

Under Section 32 a PHA may:

1. Sell all or a portion of a public housing development to eligible public or non-public housing residents;
2. Provide Capital Fund assistance to public housing families to purchase homes; or,
3. Provide Capital Fund assistance to acquire homes that will be sold to low-income families.

Section 32 generates an exception, allowing the Public Housing Capital Fund to be used to acquire units for sale that will not be put under public housing ACC contracts. This does not apply to the use of the Capital Fund by the PHA to build or substantially rehabilitate units that are not public housing for sale under Section 32. Public housing units that are newly constructed or substantially rehabilitated may be sold under Section 32, such construction and rehabilitation by the PHA is not covered under this section, but rather is governed by the public housing development and modernization regulations. Nonetheless, the final Section 32 rule replaces the Section 5(h) rule. Substantially rehabilitate or new PHA units are included in the CT State Affordable Housing Statute 8-30g.

Actions taken to provide assistance to troubled PHAs

The MRHP is not a troubled PHA. The Director of the Milford Housing Authority, d/b/a Milford Redevelopment and Housing Partnership, (MRHP) is a very knowledgeable public housing official, a proponent of affordable housing and of tenants' rights. As the certifying officer both the Mayor and the CDBG Administrator have experienced a reluctance by the PHA Director to provide financial information needed to certify MRHP annual reports and partner to prepare reports such as the new Affirmatively Furthering Fair Housing. The CDBG Administrator has an open line of communication with MRHP staff to discuss tenant complaints, project timelines, plan and environmental review approvals. The City has suggested the MRHP partnered with a local committee to form a non-profit arm of the PHA to plan and finance new scattered-site affordable housing units and provide an incentive to current landlords to accept income eligible tenants in exchange for CDBG housing repair funding, publish public housing meeting agenda and minutes in a timely manner, consistently publicize general business or information through the City provided webpage or support its own website notice its annual reports, housing application, waiting list and housing vouchers wait list and MRHP staff contact information as well as CDBG public notices, and City events and services, or housing lists for private affordable housing is available to the tenants. In the MRHP certifies it meets with residents every six weeks to discuss tenant ideas and concerns at different housing complex locations. Last year one (1) public housing residents contacted the CDBG Administrator to complain about old and broken window locks in their unit.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The cost of land, the median home price and rental costs in Milford coupled with restrictive zoning density regulations by acre and lot size, set back limits and maximum parking requirement are barriers to constructing homes with more than 1 or 2 units. Historic zoning and banking policies are perpetuated by current government ordinances create social and economic barriers for persons with limited financial means from moving into a town with high property costs based on predominately single family zoning regulations.

Individuals not born and educated in a town in which Single Family zoning regulations are historically protected and multi-family zoning, or density housing, is restricted to areas or neighborhoods considered undesirable statistically experience less life choices and opportunities to education and connections with people in positions to positively affect an outcome that increases earning ability, social inclusivity and safe decent housing conditions and neighborhoods. The social ramifications stemming from housing inequality directly correlate to exclusivity and lack of empathy for people who look different from you. The economic ramifications culminate in increased commuting and transportation costs, reduced time with family and increased child care costs, poor housing conditions and unsuitable neighborhoods in underfunded school districts with generally lower test scores and graduation rate, living in or near unsafe neighborhoods with little safe public parks or open space area.

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

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The inability for a low/moderate income household to find reliable long term affordable housing options in CT is one of the biggest obstacles to meeting the needs of the underserved, coupled with traditional downpayment requirements, lingering debt due and/or lack of credit or bad credit are steep hurdles to overcome for a low/moderate income household. Difficulty paying high housing costs creates instability and is documented to both long term financial and health effects on people. In Milford 80% income guidelines for a household of four (4) is \$75,500. In the 2000 Census 34% of the homes in Milford were valued at \$150,000. According to the 2013-2017 American Community Survey (ACS) Milford has 16,525 owner occupied homes, approximately 12% are valued between \$100,000 – \$199,999 and the median home price in Milford is \$303,200. The number of housing units paying rent in Milford is 4,907, the median gross rent is \$1,539, a 6% increase, and the national median gross rent is \$982 according to the 2013-2017 ACS. <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>
https://www.huduser.gov/portal/pdrdatas_landing.html

The City allocates grants and some technical assistance to the homeless shelter, the Human Service Department, a few community volunteer groups, senior and transportation agencies who serve and maintain specific community services. Milford is a civic minded volunteer based community which strongly supports local public services that assist the homeless, mental health/addiction programs, childcare, counseling, accessibility, availability, and suitable living environments for residents living at or below low and moderate income levels. The CDBG staff fields a inquiry's from residents looking for assistance to resolve tenant landlord disputes, small business support, affordable rental housing. In 2017 a list of affordable rental housing and their locations in Milford was made available. In 2018-19, the Fair Housing Officer received six (6) inquiries referencing unfair rental and housing practices. Three callers expressed circumstances that appeared to be in violation of fair housing discrimination based on income level by a private owner(s) and a property manager(s) of an 8-30g. In one case, a rental applicant was leased the apartment but six months later the property manager announced that the rent would increase at lease end. Another rental applicant and current tenant were presented with financial "hurdles" and opted not to pursue the unit or file a complaint. The property managers when contacted by the Milford Fair Housing Officer disagreed with the income verification and rent level requirements but advised that they would oblige. These properties will be referred to the CT Fair Housing Association for further review.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

This housing program year three (3) of the three eligible household contain lead paint in the project area of their homes and encapsulation and/or abatement will be complete to make their homes health and safe for the family and future owners. HUD requires any residential participating in the CDBG housing program receive free financial assistance. Houses built before 1978 must be inspected for lead-based paint (LBP) and any chipped or peeling paint in the project area is tested for LBP. A positive test requires the paint be stabilized or remediated using safe paint practices by a certified contractor. Households with children under age six, must meet additional requirements to prevent developmental issues for children under six exposed to lead paint from paint chips or dust and debris during a home maintenance project. LBP inspection and tests are performed at no cost to the property owner as it is a requirement of the U.S. Department of Housing and Urban Development. A written LBP test results and assessment report(s) are kept in the program participant file and the owner receives a report to prevent future issues and to disclose at the time property sale.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The CDBG allocations to public services in support of low and moderate income households experiencing habitual financial and housing instability and alleviate poverty on a daily basis. To reduce the consequences of poverty and risk of homelessness, residents can access the Department of Human Service counseling programs, book discussions, speakers, craft classes, computers for job search and resume assistance through the Public Library and the Milford Adult Education program offers the State mandated ESL program classes along with CDBG scholarships for career based classes to increase job skills and employment opportunity, the Literacy Center of Milford provides tutors to persons enrolled to learn or improve their English speak and/or writing skills, local food banks are offered by the faith based community to prevent food insecurity, improved public facilities for recreation and social interaction, and Liberty Point Housing and the Beth El Center offer support services designed by case manager to help clients learn skills and access resources to regain self-sufficiency.

Other local organizations offer programs and assistance to families at poverty level include; the Senior Center, Bridges Healthcare, BHCare Domestic violence court advocate, Boys and Girls Club childcare, City Departments, the Board of Education, local churches, United Way of Milford, the Red Cross and Salvation Army and Boys and Girls Village and the Collaborative for Residential Integrity of the Disabled & Elderly (CRIDE) addresses the behavior of hoarding and the sub-standard housing conditions and daily hardship it creates for families.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

In the new program year a new bus shelter will be replaced with a new shelter containing ADA accessibility features for approximately \$15,000. Milford is served by four fixed route bus lines operated by Milford Transit District Transportation and services routes that stop at the Metro-North train station and regional bus routes operated by the Greater Bridgeport Transit District. The Milford Transit District provides a Ride program in and out of town to the elderly and disabled without access to the fixed route bus system or personal transportation. The Ride program is

scheduled in advance for a specific in purpose. The Milford Senior Center also provides transportation to the Center, shopping and medical appointments at no charge any member 62 years or older.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Milford Health Department formed the Collaborative for Residential Integrity of the Disabled & Elderly (C-RIDE) to take the lead to address hoarding and derelict housing conditions in neighborhoods. C-RIDE is comprised of representatives from a variety of municipal, nonprofit, and community-based agencies to counteract housing issues. The group meets to discuss cases, determine best practice strategies, and encourage continuous progress in this area. In 2016 DHS accepted its first CDBG award in many years for a Subsistence Payment Program which can provide up to three months rent and mortgage payments and/or utility bills; administers CT Energy Assistance Program (CEAP) to help with the cost of heating for households whose incomes are at or below 60% State median income; it coordinates the Human Service monthly meetings for local agencies to discuss community needs and where to find programs and resources to assist people facing a variety of concerns such as food insecurities, elder abuse, domestic violence, teen pregnancy prevention, elderly and disabled services, home health care, job training, youth programs/issues, mental health, or hoarding/health issues, affordable housing, foreclosure, and housing repair and handicap accessibility.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

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

The CDBG/Fair Housing Officer responds to inquiries from residents, landlords, lenders and realtors regarding landlord/tenant complaints, discriminatory housing practices, and affordable rental and income requirements. In 2018-19, the Fair Housing Officer received six (6) inquiries referencing unfair rental and housing practices. Three callers expressed circumstances that appeared to be in violation of fair housing discrimination based on income level by a private owner(s) and a property manager(s) of an 8-30g. In one case, a rental applicant was leased the apartment but six months later the property manager announced that the rent would increase at lease end. Another rental applicant and current tenant were presented with financial “hurdles” and opted not to pursue the unit or file a complaint. The property managers when contacted by the Milford Fair Housing Officer disagreed with the income verification and rent level requirements but advised that they would oblige. These properties will be referred to the CT Fair Housing Association for further review.

In 2016, the CDBG Administrator adopted use of boilerplate Affordability and Fair Housing Marketing Plan prepared accordance with the CT 8-30g legislative requirements and provided an 8-30g-8 Maximum set-aside housing payment calculator. Both are posted on the Department of Economic and Community Development webpage. Along with a list of private and publically owned affordable rental housing and homeownership units in Milford prepared for the public using public records and records from the Planning and Zoning Office. The list is updated yearly to include any new property management contact names for the purpose of reducing barriers to set-aside housing and promote fair housing. <https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-housing-programs-and-fair-market-rent-fmr-income>

On a monthly basis the City Clerk’s Office sends the property transfers and foreclosure notices (Lis Pen Dens) recorded in the Clerk’s office to the CDBG Administrator to prepare a list for the Mayor’s office to mail information

on Mortgage Mitigation & Foreclosure Prevention programs to the owners to assist in mitigating mortgage agreements to avoid foreclosure. There were 73 foreclosure notices reported by the City Clerk thus far in 2019. According to Realty Trac, foreclosure rates are high in New Haven County, Litchfield County and medium across the Hartford Tolland and Windham Counties.

<https://www.realtytrac.com/statsandtrends/foreclosuretrends/ct/>

FORECLOSURE STATUS DISTRIBUTION FOR CONNECTICUT OCTOBER 2019

The current distribution of foreclosures based on the number of active foreclosure homes in Connecticut. Pre Foreclosures

Prior Month	Prior Year
↑ 2.5 %	↓ 9.5 %

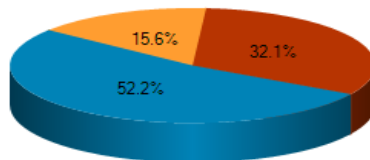
Auction

Prior Month	Prior Year
↓ 10.9 %	↓ 19.6 %

Bank Owned

Prior Month	Prior Year
↑ 17.1 %	↓ 31.8 %

■ Pre-Foreclosure ■ Auction ■ Bank-Owned



Since the 2012 financial crisis, mortgage companies and banks have returned to strict lending practices to prevent loan defaults and protect borrowers from ruining personal credit but lending and home sales are much lower in 2018 than before the crisis. The ECD provides a list of HUD housing counseling agencies and CT Judicial Resources on its webpage to assist buyers and homeowners looking for guidance foreclosure mitigation, the mortgage process household budgeting, paying off debt to build credit or correct credit scores, down payment assistance programs. The CDBG Administrator and the ECD office work with Capital for Change, the Housing Development Fund, Bridgeport Neighborhood Trust Mutual Housing Association and Neighborhood Housing Services of New Haven who present low interest housing assistance and referrals on housing repairs to community non-profit organizations such as HomeFront, Habitat for Humanity and Westbridge, Inc.

CR-40 - Monitoring 91.220 and 91.230

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

Standards and Program Compliance

The CDBG administrator manages and/or prepares all annual reports, budget and financial transactions, IDIS activity data reporting and financial transactions, the CDBG NOFA public participation and application process, technical assistance, subrecipient activity monitoring, project coordination and bids, compliance with program requirements and timely expenditures to meet the HUD ratio by August 2nd each year. (PR56 CDBG Timeliness Report).

The CDBG Administrator attends HUD sponsored CDBG training and Roundtables, reviews the HUD regulations and industry literature, is a member of the NCDA, Fair Housing Association of CT, and the CT Housing Coalition. When possible will attend meetings and events held by organizations such as the Partnership for Strong Communities, and NCDA, Fair Housing Association of CT, the CT Housing Coalition, CERC, CT Conference for Municipalities and Regional Plan Association Connecticut Forums to hear about ideas and plans in the Tri-State area and network.

CDBG grantees sign a Subrecipient Agreement to accept a CDBG award. The Agreement specifies HUD regulations, CDBG requirements and City policy as the framework to accomplish the activity and program year expenditure deadline. The CDBG Administrator interacts with the CDBG Subrecipients throughout the program year in the form of technical assistance responses, monitoring, public hearings, sharing best program practices, community news and developments.

The CDBG Administrator holds a second public hearing to provide an opportunity to the public, CDBG Subrecipients and local agencies to present program questions, review and discuss the accomplishments reported in the 2018-19 CAPER, provide new program or project information and HUD updates on December 19, 2019.

Program Monitoring

An annual remote or onsite subrecipient monitoring is conducted to determine the subrecipients overall program performance, to discuss HUD expectations, regulations, and steps the organization can take to build capacity. A monitoring notification letter is sent to prepare monitoring the Subrecipient, and set a date to meet. The monitoring of records include, according to an activity national objective, documentation of income, expenditure and activity, household income certification, timely and thorough activity reporting and expenditures to complete the program by the year-end deadline. The CDBG Administrator conducted onsite Subrecipient monitoring visits in August 2017 and found the Subrecipient records to be in order and no follow up was required.

The goal of the Administrator is to assist the Subrecipient to obtain the level of organizational skill to comply with CDBG and federal requirements, understand the value of relaying grant activity accomplishment details, and be aware and accountable for expending federal funds in a timely manner and ensure the greatest public benefit from the program. It is the aim of the Administrator to use the CDBG requirements and monitoring process to help the organization grow on a managerial level and its capacity to collect and discern data valuable to secure additional funding resources.

Citizen Participation Plan 91.105(d); 91.115(d)

The City of Milford follows its 2010 Citizen Participation Plan in the preparation of all annual reports and notices. All public notices include but are not limited to: application deadline, dates and times, purposes of the public

hearing(s) and comment periods, and amount of funding award, proposed Annual Action Plan budget and CAPER review. Also the HUD Annual CAPER Letter is made public and distributed at public hearing(s) with the NOFA.

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

To encourage involvement in the CDBG program all notices are advertised in the newspaper, posted on the City website, and available to review in the ECD office and Public Library. In addition, notices are sent to adjacent communities, the regional planning agency, the local housing authority and local agencies key in the consultation and review.

Date of Publication: 12/5/19

CITY OF MILFORD
Public Comment & Hearing
Community Development Block Grant (CDBG)
Consolidated Annual Performance Evaluation Report
Fiscal Year 2018-19

With this public notice, the City solicits comment from the community on the Consolidated Annual Performance Evaluation Report (CAPER) for Program Year 44 between December 5, 2019 and December 20, 2019. The CAPER is available to review for a 15-day public comment period in the Department of Economic & Community Development (ECD), Parsons Complex, 70 W. River Street, Milford, CT, the Milford Public Library, 57 New Haven Avenue, and the ECD webpage at www.ci.milford.ct.us.

The Department of Economic and Community Development will hold a second public hearing on Thursday, December 19, 2019 at 5:30 pm, in Conference Room B, Parsons Government Complex,

70 West River Street, 2nd floor, Milford, CT. The hearing will provide HUD updates, solicit comment from the public, CDBG Subrecipients and local agencies, and discuss the program accomplishments reported in the CAPER.

The Department of Economic & Community Development will accept written comment on the CAPER until 5pm on December 20, 2019 to include with the submittal of the CAPER. The CAPER will be electronically submitted via the HUD IDIS System on or before its due date of December 30, 2019 and to U.S. Department of Housing and Urban Development, Community Planning Department, One Corporate Center, 20 Church Street, 10th Floor, Hartford, CT 06103. This notice is in accordance with the provisions of 24 CFR 91.250.

No written comments were received. Please find the attached public notice and comment documents.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The 2018-2019 Program Year implemented activities to address the community development objective set forth in the Consolidated Plan. The activities served to improve the condition of the neighborhoods and facilities, community services, provide housing programs to assist both income-eligible household's renter and owners maintain the residential property, and an opportunity to buy a home in Milford. The Homeownership Program, a Multi-family Residential Housing Repair Program and Micro-Enterprise/Business Assistance program have not met

expectation considering the low and level rate of bank loan interest and uptick in consumer confidence. The uptick in the economy and real estate prices may have positively affected property values which is good news real estate owners but not buyers and small businesses looking for a deal.

The grantee anticipates supporting of fair housing services, housing and community development, a possible shift toward special economic activity to fund façade improvements, housing repairs and public facilities improvements, and other development projects such as resiliency. The Section 108 program may be used in the future to deflect a growing State and the Federal budget deficit government and may necessitate developing a self-sustain the CDBG program and streamline the total number of grants required to administer. With the exception of the homeless shelter programs, the majority of the privately owned non-profit public facility have a high level of deferred maintenance and a low level of project oversight, add in the high cost of construction and the numerous administrative hours spent on each project will find the City completing only 1-2 public facility projects a year. It is best to continue to streamline staff hours and reduce the number activity grant allocations to capture the highest level of public benefit.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

This jurisdiction does not have any open Brownfield Economic Development Initiative (BEDI) grant.