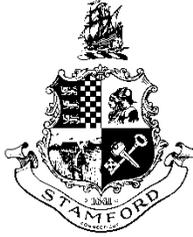


**MAYOR
CAROLINE SIMMONS**



**PURCHASING MANAGER
ERIK J. LARSON**

Phone: (203) 977-4107
Email: elarson@stamfordct.gov

**CITY OF STAMFORD
OFFICE OF ADMINISTRATION
888 WASHINGTON BOULEVARD
P.O. BOX 10152
STAMFORD, CONNECTICUT 06904-2152**

**ADDENDUM NO. 2
October 16, 2023
2024.0137**

City RFP - City of Stamford Comprehensive Plan 2025-2035

Addendum No. 2 is being issued to all potential bidders to provide the items and attachments set forth herein which shall act to qualify, clarify, or otherwise modify the Contract Documents previously issued regarding the above referenced project. These items, whether of omission, addition, substitution, or clarification, shall be incorporated into the proposals submitted by all bidders, and receipt of this document and its attachments must be acknowledged, either in the space provided on the Bid Form or on the Contractor's Form of Proposal. Failure to do so may subject the Bidder to disqualification.

The items and references are as follows.

All proposers are advised with the move from in-person to virtual the requirement for mandatory participation is waived. The meeting was recorded. All information is available to any proposer via the link to download pre proposal meeting recording in a variety of formats:

<https://www.dropbox.com/scl/fo/aw0lm25uc1qwlwhvmajvv/h?rlkey=cunokrzfu0onqd61netc188pb&dl=0>

Questions and answers

Question - We just returned from a conference in Northwest Arkansas where we learned how cities there have started engaging in a much more encompassing process for their Comprehensive Plans than we typically see in Connecticut. They are setting goals for retail, leisure/recreation, housing of all types, repairing/creating "main streets," transportation/walking/biking, finance, public/private/non-profit activity, and education in smaller neighborhood-related units at 5- and 10-year intervals so the public, municipal; agencies, and professionals are all on track for achievable goals. Is Stamford interested in this more novel and encompassing approach, or preferring to stay with standard operating procedures?

Response – A comprehensive plan that is truly comprehensive in scope is aligned with Stamford's goals. Recommending achievable goals across an array of topic areas and defining a process where we can track progress would be great.

1. Pre proposal meeting presentation (follows)
2. 2020-2024 consolidated plan (follows)

3. Clarification on timeline - The City is comfortable with project completion in June 2025. If the proposer believes a longer timeline is necessary for the level of engagement the City seeks, the proposer may make the case for such a timeline.
4. Equity Action Plan how to - PRELIMINARY OVERVIEW OF THE AFFH EQUITY PLAN (follows)

All other terms and conditions of **No. 2024.0137** remain the same.

Erik Larson
Purchasing Agent

cc: Lindsey Marie Cohen, Associate Planner
Purchasing Department File

City of Stamford

Comprehensive Plan 2025-2035

10/12/2023

Lindsey Cohen, Associate Planner



LUB

City of Stamford Land Use Bureau

Meeting Overview

1. Scope Overview
2. Focus Areas
3. Deliverables
4. Evaluation Criteria
5. Timeline
6. Contact Information
7. Question and Answer Session

Scope Overview

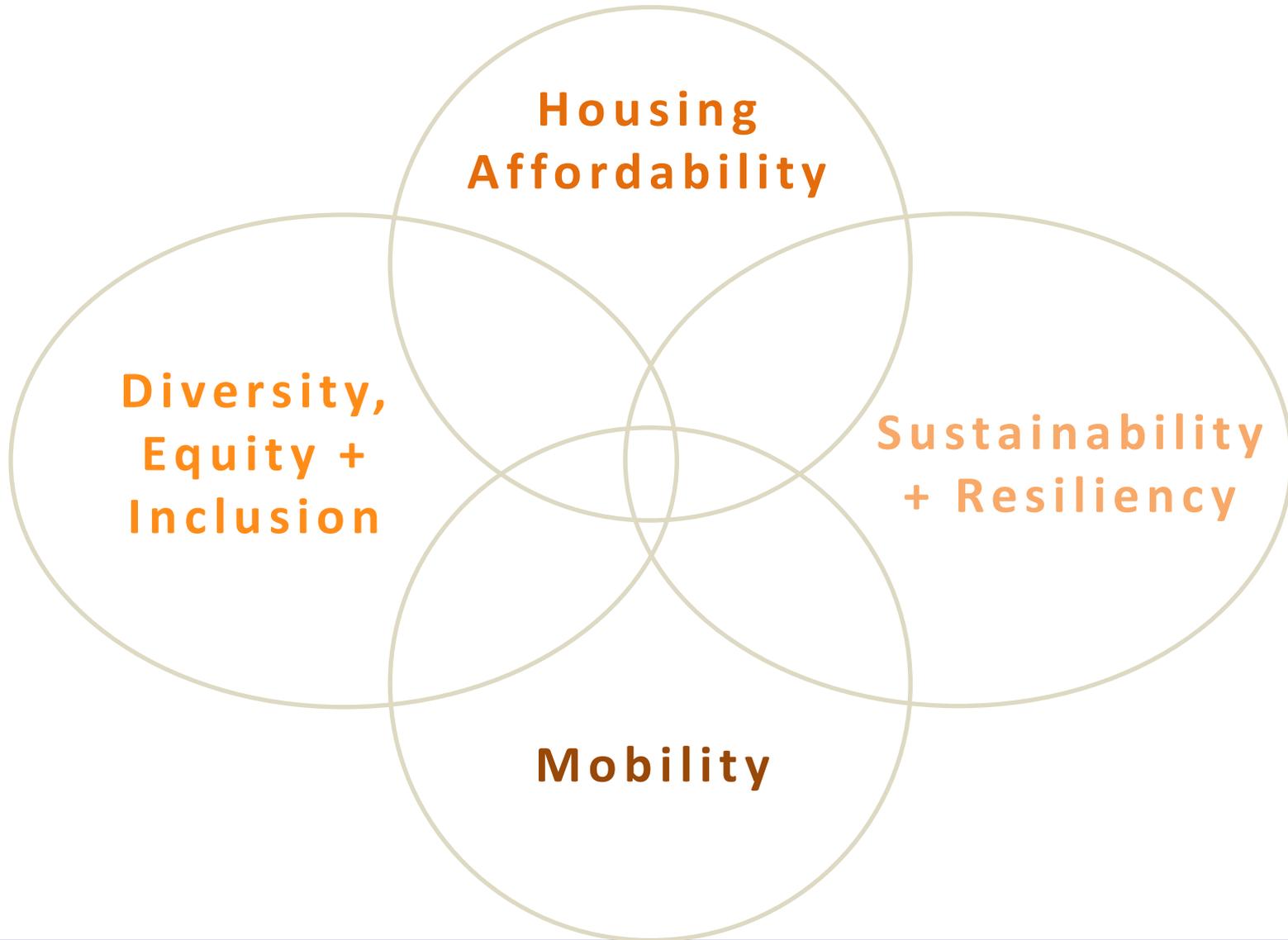
Phase 1 – Data

- 1) Collect updated data for the Housing Plan, Consolidated Plan, Equity Action Plan, and to support the Comprehensive Plan.
- 2) Share data with Community Development Department.
- 3) Analyze and identify key points for use in the Comprehensive Plan and Housing Plan.

Phase 2 – Comprehensive Plan, including updated Housing Plan

- 1) Engage a diverse base of Stamford residents and stakeholders.
- 2) Manage advisory committees
- 3) Develop actionable recommendations to achieve Vision.
- 4) Produce a concise and well-designed Plan.

Focus Areas

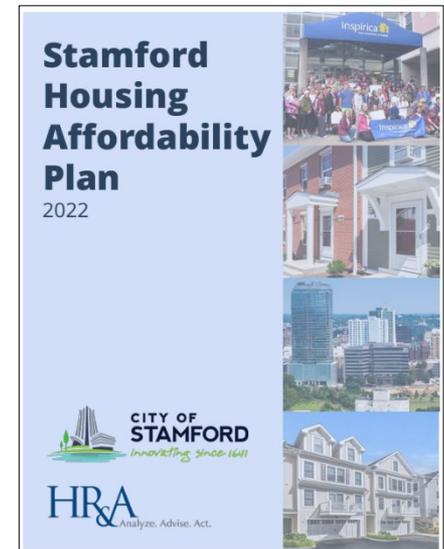


Housing Affordability

Vision: The City of Stamford strives to be affordable for all people and provide a variety of housing choices enhancing the unique qualities of the existing neighborhoods.

Things to Consider:

- 80% of Stamford is zoned for single-family only
- Stamford's housing market lacks enough housing supply for low- and very low-income hh
- Homeownership is increasingly out of reach for moderate- and low-income hh as stock has decreased
- Historic land use policies have played a role in equitable access to housing
- Executive Order on Housing Affordability



Sustainability and Resiliency

Vision: The City of Stamford wants to make great strides in addressing climate change, promoting sustainability, and reducing the carbon footprint to protect our City and environment.

Things to Consider:

- Acres of underutilized greyfields
- Evaluate ongoing sustainability and resiliency studies (drainage, coastal resiliency and tree inventory) and align with a comprehensive sustainability strategy
- Executive Order on Climate Change and Sustainability

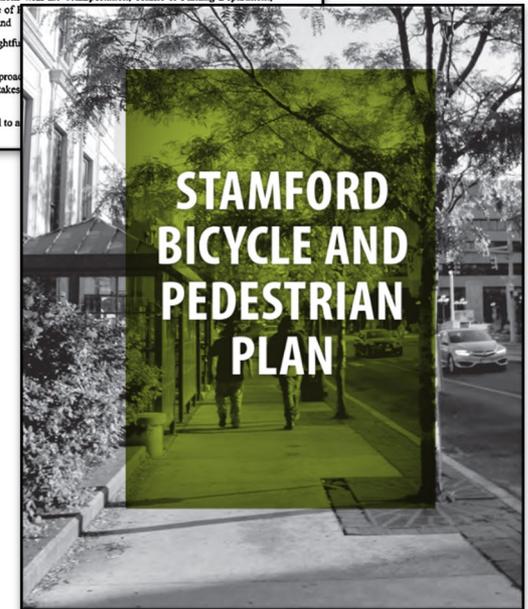
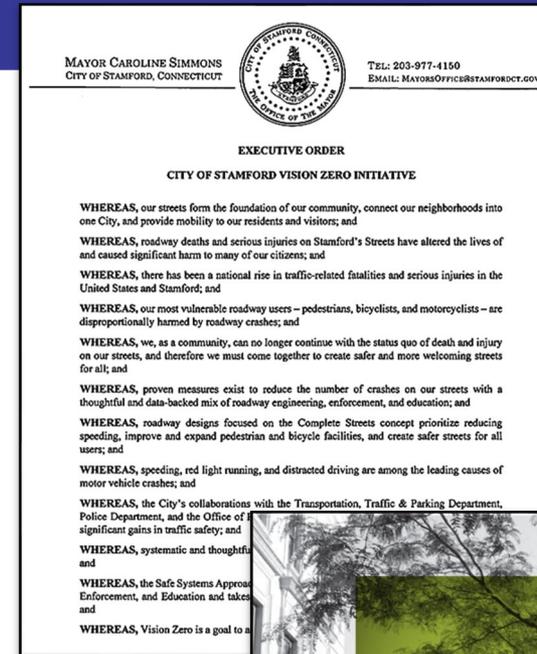


Mobility

Vision: The City of Stamford wants to provide a variety of mobility options that are safe for all users and to reduce the carbon footprint of our transit infrastructure by investing in our transit center and other active mobility options.

Things to Consider:

- Largest train hub in CT; Highest ridership station on Metro North next to GC
- Stamford's Bicycle and Pedestrian Plan
- Executive Order on Vision Zero



Diversity, Equity and Inclusion

Vision: The City of Stamford is proud of its diverse heritage and wants to actively foster opportunity and inclusion for all.

Things to Consider:

- 16th most diverse city in the U.S.
- Population is 52% people of color
- 32% of residents are foreign-born
- 75 different languages spoken in Stamford homes



Free Language Assistance

Haitian Creole: Pou jwenn asistans lengwistik oswa lòt aranjman, kontakte IDEASOffice@StamfordCT.gov. Tanpri, ajoute non w, yon nimewo telefòn, ansanm ak lang ou plis alèz ladan 1 lan, pou yon entèprèt kapab retounen w apèl la.

Polish: Aby uzyskać pomoc językową lub inne udogodnienia, prosimy o kontakt pod adresem IDEASOffice@StamfordCT.gov. Prosimy podać swoje imię i nazwisko, numer telefonu oraz język, w którym komunikacja jest najwygodniejsza, aby tłumacz mógł do Ciebie oddzwonić.

Russian: Для получения языковой помощи или других особых условий обращайтесь в по адресу IDEASOffice@StamfordCT.gov. Пожалуйста, укажите Ваше имя, номер телефона и язык, на котором Вам удобнее всего говорить, чтобы переводчик мог Вам перезвонить.

STAMFORD pride JUNE 2023

JOIN US for Stamford Pride's events happening throughout downtown Stamford during June! Stamford Pride has partnered with several local businesses and organizations to create inclusive and engaging events to help bring support and visibility to the LGBTQIA+ community. Whether you are part of the community or an ally — you are welcome!

01 FLAG RAISING

10PM | Stamford Government Center

01 PRIDE LIGHTS

8:00PM | Happy Hour - Bradford's Bar & Tavern
8:00PM | Lighting - Oak Tavern Hall

03 PRIDE MARCH*

COME MARCH WITH US!
MIDDLETOWN PRIDE

10PM | Spring Street, Middletown, CT

09 RAINBOW RAVE*

RAINBOW RAVE
JUNE 17 | 9-10PM

8:00PM | Pines Lounge

DONATE TO Stamford Pride!

Deliverables

- Data
- Quarterly status reports
- Website
- Comprehensive Plan for 2025-2035 including an update to the Housing Plan (print and web versions)
- Summary pamphlet (print and web versions)
- Template for annual update

Evaluation Criteria

Criteria	Weight
1. Understanding of the work to be performed	30%
2. Demonstrated corporate experience and capacity	25%
3. Qualifications of key assigned staff and team organization	25%
4. Thoroughness of community engagement summary	10%
5. Fee proposal	10%

RFP Timeline

October 5	RFP posted
October 12	Mandatory pre-proposal meeting
October 19	Deadline for submission of inquiries
November 2	Proposals due by 4:00 PM
November 20	Review of RFPs completed
November 23	Zoom interviews with short-listed consultants
November 28	Notification of successful consultant team

Contact Information

Technical Questions:

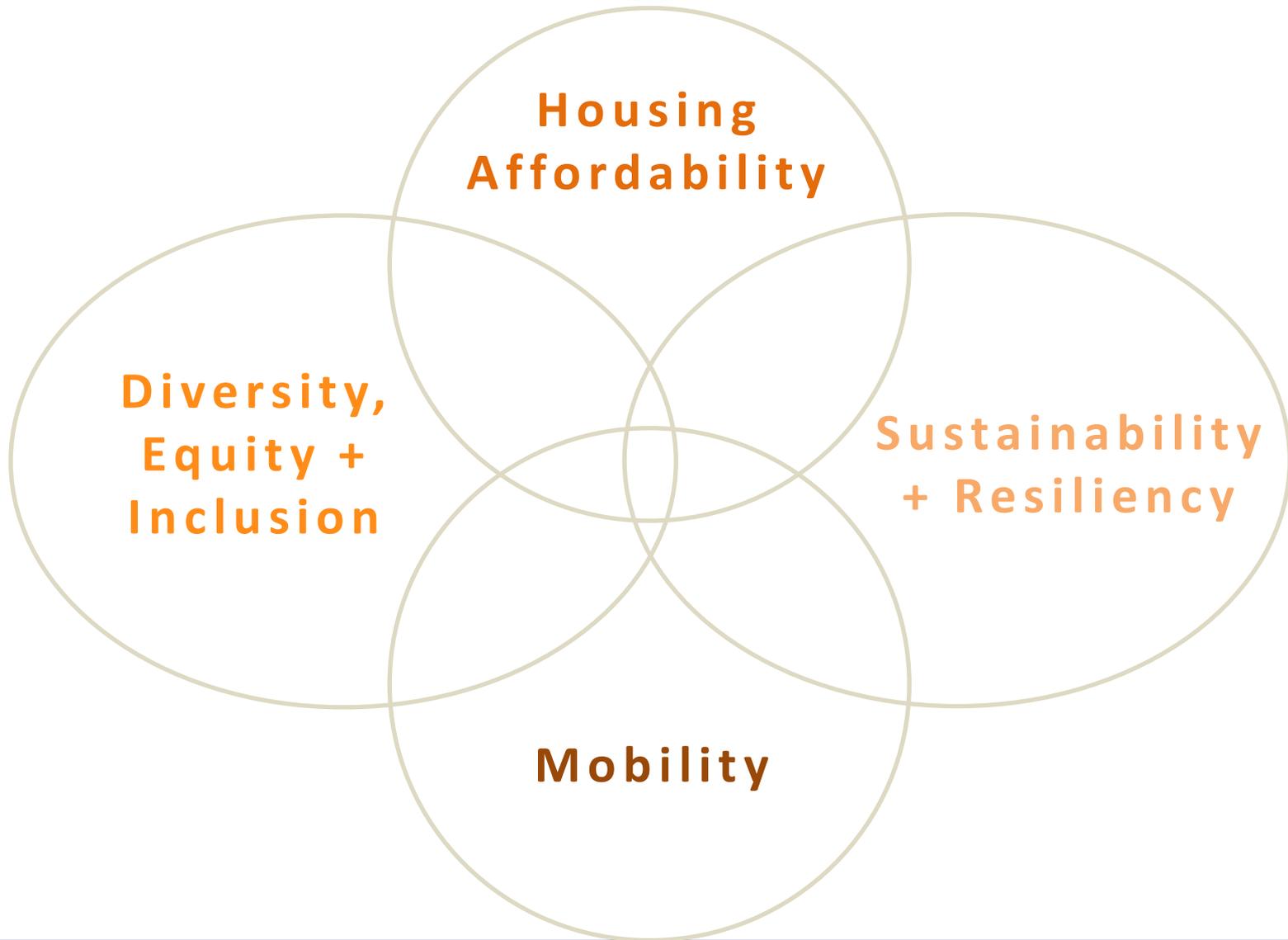
Lindsey Cohen, Associate Planner

lcohen@stamfordct.gov, (203) 977-4388

Contract/Procurement Questions:

Erik Larson, Purchasing Manager

elarson@stamfordct.gov, (203) 977-4107



Executive Summary

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

1. Introduction

The City of Stamford is a federal entitlement city under the U.S. Department of Housing and Urban Development (HUD) and receives grant funds for Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The City works to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low- to moderate-income individuals and special needs communities. As a HUD entitlement community, the City is required to submit a 5-Year Consolidated Plan which includes an extensive citizen participation process, a community needs assessment, a housing market analysis and a Strategic Plan which explains how the priority needs of the community identified in this Plan translate to goals and objectives. The Strategic Plan includes broad strategies to advance goals related to improving public facilities and infrastructure, economic development and public services that will improve the quality of life of Stamford's residents. Finally, the Annual Action Plan (AAP) shows how the City of Stamford will use community development resources to address the needs of the City's low- and moderate-income residents during the first year of the 5-Year Consolidated Plan. The AAP (Year 46) covers July 1, 2020 - June 30, 2021 for the use of both CDBG and HOME funds. Approximately 100% of those served will be low or moderate income.

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

The City of Stamford has developed its strategic plan based on an analysis of the data presented in this plan and an extensive community participation and consultation process. Through these efforts, the City has identified four priority needs with associated goals to address those needs. The priority needs with associated goals include:

Expand Improve Public Infrastructure & Facilities

1A Expand & Improve Public Infrastructure

1B Improve Access to Public Facilities

Preserve & Develop Affordable Housing

2A Increase Homeownership Opportunities

2B Increase Affordable Rental Housing Opportunities

2C Provide for Owner Occupied Housing Rehabilitation

Public Services & Quality of Life Improvements

3A Provide Supportive Services for Special Needs

Provide for Economic Opportunities

4A Provide Financial Assistance New Expanding Businesses

The AAP allocates funds to provide decent housing, create a suitable living environment and promote economic opportunities, through a total of 25 CDBG activities, and HOME budget line items. The City was allocated \$976,993 in CDBG funds in the first year of the AAP. CDBG funds address the decent housing objective with three activities totaling \$232,292. Activities will focus on improving the sustainability of low-income housing complexes. The Stamford Community Development Program will support an additional 50 units through program delivery of other CDBG/HOME/NSP activities.

Eleven public service activities, receiving a total of \$146,586, will help create a suitable living environment. Activities include health and homeless related services, services for seniors, services to domestic violence victims and activities for youth.

Six public improvement activities totaling \$339,218 will assure sustainability of a homeless shelter and services facility, improve handicapped accessibility, and enhance energy efficiency for a child care facility and a mental health facility. Finally, \$28,506 will be held in contingency for approved public improvement or housing projects that require additional funds.

HOME funds will be used to create units of affordable housing by rehabilitating rental units, assisting in construction of new units, and by providing down payment assistance. A total of \$418,413 in HOME funds and an additional \$50,000 in repaid HOME loan funds are available to the City of Stamford for the creation of affordable housing under the HOME program.

3. Evaluation of past performance

The City of Stamford, with other public, private and non-profit community housing providers and non-housing service agencies have made significant contributions to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low- to moderate-income and special needs households in the community. However, improvements to public facilities and

infrastructure, vital public services, affordable housing and economic development remain some of the most prolific needs facing the City of Stamford, as documented by the current Consolidated Plan, the City's previous Consolidated Plan, and the Consolidated Annual Performance and Evaluation Reports (CAPER).

In YR45 (2019-2020) the City of Stamford expended 100% of its CDBG Public Service and HOME funds on projects or activities that benefited low- and moderate-income individuals, which exceeded the 70% required by statute. Expenditures for public service activities were below the 15% cap and the expenditures for planning and administration were kept below the 20% cap. As well, the City passed the May 2, 2019 timeliness test. HUD's review of the previous grant year (2019) determined that the City of Stamford's performance was "satisfactory". (HUD rates "Connecticut grantees' overall performance in carrying out their programs as either satisfactory or unsatisfactory.")

4. Summary of citizen participation process and consultation process

The Citizen Participation Process and consultation process occurred as outlined in the attached Citizen Participation Plan and Public Hearing/Application Schedule. The document is included with each application packet and defines the publication schedule, goals and public hearing dates and procedures. Legal notices were published in The Advocate and information was distributed by email and made available online. Two public hearings were held on January 27, 2020 and March 16, 2020. Documents were made available online, at the Government Center in the Community Development Office. An online stakeholder survey and community survey was provided to have citizens give input on the housing and community development needs of the City.

The Citizen Participation Process impacts the funding process as applications and presentations inform and connect the committee with the needs of the CDBG target population. In addition, the Housing and Community Development/Social Services (HCD/SS) Committee of the Board of Representatives meets on issues pertaining to housing and community development. The Committee meets monthly. Anyone interested in meeting with HCD/SS Committee may contact the Community Development Director or the Chairperson of HCD/SS in care of the office of the Board of Representatives in the Government Center.

The Community Development staff is available throughout the year to receive verbal or written comments regarding HUD funded activities and suggestions by citizens on how to improve the use of HUD funds in Stamford. Community development staff attend neighborhood meetings and participate in the regional Continuum of Care (CoC) Opening Doors Fairfield County. All applications funded will advance the priorities and goals outlined in the Consolidated Plan

5. Summary of public comments

At the January 27, 2020 public hearing each applicant for CDBG funds spoke about their programs and the needs of their clients. No other comments were received. A draft AAP was made available and a

second public hearing was held on March 16, 2020, no comments were received. An online stakeholder survey and community survey was provided to have citizens give input on the housing and community development needs of the City. There were 8 responses to the stakeholder survey and 12 responses to the community survey. For more details of the comments made from the public, see the citizen participation attachment in the AD-25.

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

No comments or views were rejected or not accepted.

7. Summary

The AAP builds on and enhances the work done to develop the Consolidated Plan and YR45 AAP. The activities funded addresses the needs of our community.

Primary data sources for the Consolidated Plan include: 2006-2010 & 2014-2018 American Community Survey 5-Year Estimates, 2012-2016 CHAS, Longitudinal Employer-Household Dynamics (LEHD), Bureau of Labor Statistics, Inventory Management System/PIH Information Center (IMS/PIC), HUD Fair Market Rent and HOME Rent Limits, Balance of State CoC 2019 Point-in-Time data for the City, and other local sources. A disparity exists between data tables throughout the plan in that tables which utilize ACS contain 2018 data and tables that utilize CHAS contain 2016 data. At the time of writing only 2016 CHAS data was available from HUD. However, 2018 ACS data was available and thus the City thought it best to utilize the most current data source where possible, and that incongruencies in the source years were outweighed by the more accurate demographic and housing picture painted by the 2018 ACS data.

The Process

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

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

The following are the agencies/entities 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	STAMFORD	Community Development Office
HOME Administrator	STAMFORD	Community Development Office

Table 1 – Responsible Agencies

Narrative

The Community Development Office is the lead office for the development and administration of the City of Stamford's Consolidation Plan and Annual Action Plan.

Consolidated Plan Public Contact Information

Tara Petrocelli - Administrative Officer for Community Development
Stamford Community Development Office
Stamford Government Center
888 Washington Blvd.
Stamford, CT 06904-2152
Phone 203.977.4053
Email tpetrocelli@stamfordct.gov

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The 5-Year Consolidated Plan and the Annual Action Plan is informed by ongoing collaboration between City departments and local and regional non-profit agencies. The Community Development Office and the BOR HCD/SS Committee regularly consults agencies serving the needs of Stamford's LMI residents.

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

The City continues to work closely with The Community Action Agency of Western Connecticut - the State funded CAP agency serving Stamford and provides the agency with office and program space in a City owned building. The City is negotiating with a local non-profit service provider to lease space in a City building which will allow the agency to provide enhanced casework services, access to food, clothing, and emergency financial assistance to Stamford LMI residents. The City consults with regional nonprofits such as the United Way of Western Connecticut and Fairfield County's Community Foundation to ensure awareness and coordination of efforts to meet the needs of housing providers, health, mental health and service agencies. The City works with the Opening Doors Fairfield County (ODFC) to ensure our efforts align with regional work to address the challenge of homelessness. In the arena of public and assisted housing the City consults with and regularly funds numerous not-for-profit affordable housing developers such as New Neighborhoods, Inc., Mutual Housing Association of Southwestern Connecticut and the Housing Authority of the City of Stamford (dba Charter Oak Communities).

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

Stamford regularly participates and supports the efforts of the Fairfield County Continuum of Care (CoC) known as Opening Doors Fairfield County (ODFC). The City remains abreast of regional efforts to address the needs of homeless persons and persons at risk of homelessness. The City supports ODFC's application and provides assistance with the Environmental Review process. The City allocates CDBG funds to support programs and services that address the root causes of homelessness and provides support to address the needs of those who are homeless. The towns surrounding Stamford do not provide emergency, transitional or supportive housing shelters, Stamford's shelters must also serve the needs of the surrounding communities.

Demo

The City supports Pacific House, Inc. (f/k/a Shelter for the Homeless, Inc.), Inspirica, Inc., and Laurel House, Inc. One example of the efforts to address the needs of homeless persons is the work done by Laurel House which seeks to quickly connect individuals experiencing homelessness and living with serious mental illness to permanent housing and supplemental services. They participate in ODFC to streamline Coordinated Assessment and access with Pacific House, Inc. and Inspirica, Inc. Laurel House uses HMIS to collect demographic and service information to provide data on homelessness for Southwestern, CT and the state and considers the VI-SPDAT and chronicity to prioritize referred candidates.

Laurel House has a Support Plus program which provides Permanent Supportive Housing (PSH) with enhanced support and supervision to chronically homeless individuals living with serious mental illness and other disabilities which further compromise their health. Support Plus is a hybrid program that was developed by Laurel House and endorsed by the then Stamford-Greenwich CoC, in response to an identified gap in appropriate services for seriously disabled individuals who need additional supports and a degree of supervision in order to succeed in PSH and to age in place where possible, without needing greater levels of specialized care.

Laurel House and Mutual Housing Association of CT work together to provide permanent supportive housing services to 13 individuals living with mental illness, four of whom are chronically homeless and two with a history of chronic substance abuse. Participants are assigned a Residential Services Counselor who works to implement the individual's Recovery Plan using services, as appropriate, provided at the Laurel House Resource Center including: Supported Education, Supported Employment, food service, wellness, cognitive remediation, social opportunities and events. The Laurel House service model is an outbound model that provides Supported Housing residents services in their homes or at school, at work or in the community.

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

The City does not receive ESG funds. The City supports and participates in the ODFC. ODFC receives funds for the HMIS system through the annual NOFA. Homeless service providers are trained in HMIS use, and ODFC seeks to "Ensure that there is a single, functioning Homeless Management Information System (HMIS) and uniform manner to collect data for the ODFC area. Ensure there is at least an annual Point in Time count of homeless persons in the ODFC region." ODFC has created a Standards and Evaluations Committee. The Committee duties include:

1. *Establish performance targets appropriate for population and program type.*
2. *Establish remedial action protocol for low performing grantees.*

Demo

3. *Establish written standards for providing assistance, as outlined in HUD Interim Rule § 575.7(a)(9). Ensure compliance with HUD standards.*
4. *Monitor Homeless Management Information System (HMIS) participation and compliance.*
5. *Monitor grantee performance, evaluate outcomes and take action against poor performers, as appropriate.*
6. *Monitor ESG funded programs and provide performance targets and feedback to appropriate funding entities.*

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	STAMFORD
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City Community Development Office is the lead agency of the Consolidated Plan.

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

There were no agency types intentionally not consulted in the consultation and citizen participation process. All comments were welcome.

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	Opening Doors Fairfield County	Plans provide support for emergency shelters, supportive services, transitional housing
City of Stamford Master Plan	City of Stamford	Emphasis on providing housing choice for all income groups
Charter Oak Communities Major Agency 5 YR Plan	Housing Authority of the City of Stamford	Preservation and creation of LMI units
Proposed 2020 CDBG Action Plan	Town of Greenwich	Plans provide support for emergency shelters, supportive services, transitional housing
Stamford Lead Team	Stamford Environmental Health & Inspection Services	Plans support Stamford's health department in addressing housing units in which children have been identified as lead-poisoned.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City of Stamford works closely with Opening Doors Fairfield County (ODFC) with the homeless strategy in the Strategic Plan. ODFC coordinates and provides support for emergency shelters and transitional housing for the homeless in the City and greater area as well as provides support services to individuals and families experiencing homelessness. ODFC as the Continuum of Care also coordinates a

Demo

wide network of service providers to meet the needs of the homeless population. The City also works with the Town of Greenwich to help provide homeless services to the persons experiencing homelessness.

Narrative (optional):

NOTE:

Please see the AD-25 Grantee Unique Appendices for a list of consultations. Agency consultations could not be saved in the table above, however they were saved as a PDF and uploaded into the attachments.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City of Stamford adheres closely to its HUD approved Citizen Participation Plan and encourages all citizens, and especially low- to moderate-income households and persons with special needs to participate in the Consolidated Planning process. In accordance to the Citizen Participation Plan, the City has developed a formal process for soliciting citizens' input in developing the Consolidated Plan and first-year Annual Action Plan. A series of public meetings, online community and stakeholder survey, public hearings and public comment review periods allowed the public an opportunity to review the Consolidated Plan and first-year Annual Action Plan.

Below is a summary of details of the citizen participation outreach efforts made by the City. Additional comments and survey results are attached in the citizen participation attachments in the AD-25.

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	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A public meeting was held on January 27, 2020. Each applicant for CDBG funds spoke about their programs and the needs of their clients. 29 proposals were submitted.	Comments addressed the full spectrum of need experienced by LMI persons.	No comments were rejected or not accepted.	
2	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A public hearing was held on January 27, 2020. http://www.boardofreps.org/hdc-ss-agendas-reports.aspx 29 people attended the hearing	Comments addressed the full spectrum of need experienced by LMI persons.	No comments were rejected or not accepted.	

Demo

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	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Legal notices were published in The Advocate.	No comments were received.	No comments were rejected or not accepted.	
4	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A public hearing was held on March 16, 2020. Zero attendance.	No comments were received.	No comments were rejected or not accepted.	

Demo

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)
5	Internet Outreach	Minorities Non-English Speaking - Specify other language: any via Google translate Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Legal notices were published in The Advocate and information was distributed by email and made available online at the City website: www.stamfordct.gov Zero responses.	No comments were received.	No comments were rejected or not accepted.	

Demo

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)
6	Newspaper Ad	Stakeholder Organizations	A stakeholder survey was open for local community organizations to provide input on the housing and community development needs of the City. There were 8 responses to the survey. A full copy of the survey is attached in the appendix.	Local community stakeholder organizations identified the following as the top priorities for funding in the City: 1. Public services.2. Creation of affordable housing/or homebuyer assistance.3. Public facilities and infrastructure improvements.4. Owner/renter housing rehab.5. Promote fair housing awareness.	No comments were rejected or not accepted.	

Demo

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)
7	Newspaper Ad	Non-targeted/broad community	A community survey was open for the public to provide input on the housing and community development needs of the City. There were 12 responses to the survey. A full copy of the survey is attached in the appendix.	Local community members identified the following as the top priorities for funding in the City: 1. Affordable housing with new affordable rental and homeownership housing.2. Public services: mental health, youth services, child care, transportation, and homeless services.3. Public facilities improvements to community centers and parks and recreational facilities.4. Economic development with job creation and retention and small business	No comments were rejected or not accepted.	
OMB Control No: 2506-0117 (exp. 09/30/2021)	Consolidated Plan		STAMFORD		16	

Demo

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)
8	Newspaper Ad	Non-targeted/broad community	A 5-day public comment review period was held from July 10, 2020 to July 15, 2020 to give the public an opportunity to make comments on the draft Consolidated Plan and Annual Action Plan.	No comments were received.	No comments were rejected or not accepted.	
9	Public Hearing	Non-targeted/broad community	A public hearing was held on July 15, 2020 at 6:30 p.m. via a virtual public hearing, to give the public an opportunity to make comments on the draft Consolidated Plan and Annual Action Plan.	No comments were received.	No comments were rejected or not accepted.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

In order to ensure the most efficient and effective use of resources the City must first assess the needs of the community. In this section, the City's various demographic and economic indicators will be described and analyzed to provide the foundation needed for grant management.

Developing a picture of the current needs in the City begins by looking at broad trends in population, income, and household demographics. Once that data has been gathered, it can be examined with a more nuanced analysis of variables, such as how family and household dynamics relate to race and housing problems.

A key goal of the Needs Assessment section is to identify the nature and prevalence of housing problems experienced by the City's residents. Per HUD's definition, there are four housing problems that are assessed:

- Cost-Burden, which is defined as households who spend 30% or more of their income on housing costs
- Lack of Complete Plumbing
- Lack of Complete Kitchen Facilities
- Overcrowding

In addition to the demographics analyzed, this section also looks at factors that impact or are impacted by the housing market. The City's public housing supply, the needs of those facing homelessness, and non-homeless special needs are addressed. Finally, non-housing development needs like public services and infrastructure are also analyzed to assist in determining how resources should be allocated.

Whenever possible, each of these issues is juxtaposed with economic and demographic indicators to determine if certain groups carry a disproportionate burden. Understanding the magnitude and prevalence of these issues in Stamford is crucial in aiding in setting evidence-based priorities for entitlement programs.

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

Summary of Housing Needs

The housing needs of a community are, like all items in the market economy, a product of supply and demand. However, determining the factors that impact supply and demand is much more complicated than ensuring there is one housing unit per household. Changes in population, household size, availability of rental housing, income, and the condition of a property all work to shift the community’s housing needs.

The following section will show that the greatest housing issue facing Stamford is affordable housing. According to the 2014-2018 American Community Survey 5-Year Estimates, there are approximately 21,676 cost burdened households in the City, making up 47.5%. Renters are much more likely to be cost burdened, approximately 53.7% pay over 30% of their income towards housing. Homeowners are slightly better off but still 47.9% of those with a mortgage and 27.4% of those without a mortgage are cost burdened. This points to the current housing supply being either too small or too expensive.

Demographics	Base Year: 2010	Most Recent Year: 2018	% Change
Population	120,907	129,026	7%
Households	46,396	49,510	7%
Median Income	\$75,579.00	\$89,309.00	18%

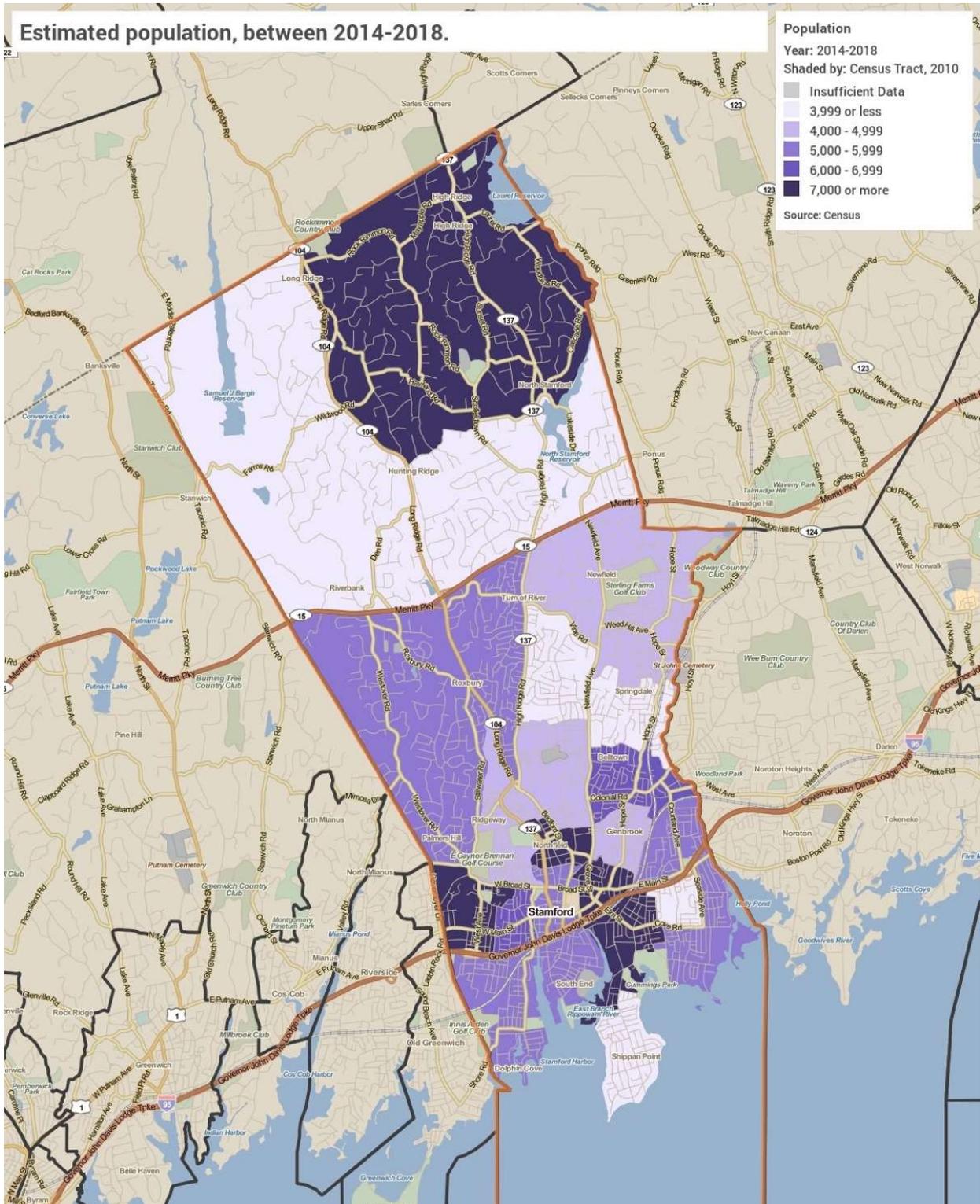
Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:
2006-2010 ACS, 2014-2018 ACS
Data Source Comments:

Since 2010, the population and number of households in Stamford both grew by approximately 7%. Residents of Stamford have experienced an increase in the median household income, approximately 18%. Unfortunately, due to inflation the purchasing power of residents has not grown as significantly. According to the Bureau of Labor Statistics, a median household income of \$75,579 in 2010 has the same purchasing power as \$86,454 in 2018, an increase of 3.3%.

Population

The following map displays the population density throughout the City. In Stamford, there are two. The downtown tract has fewer than 2,000 people while most tracts have over 4,000. There are also two areas with disproportionately large populations, over 8,000 people.

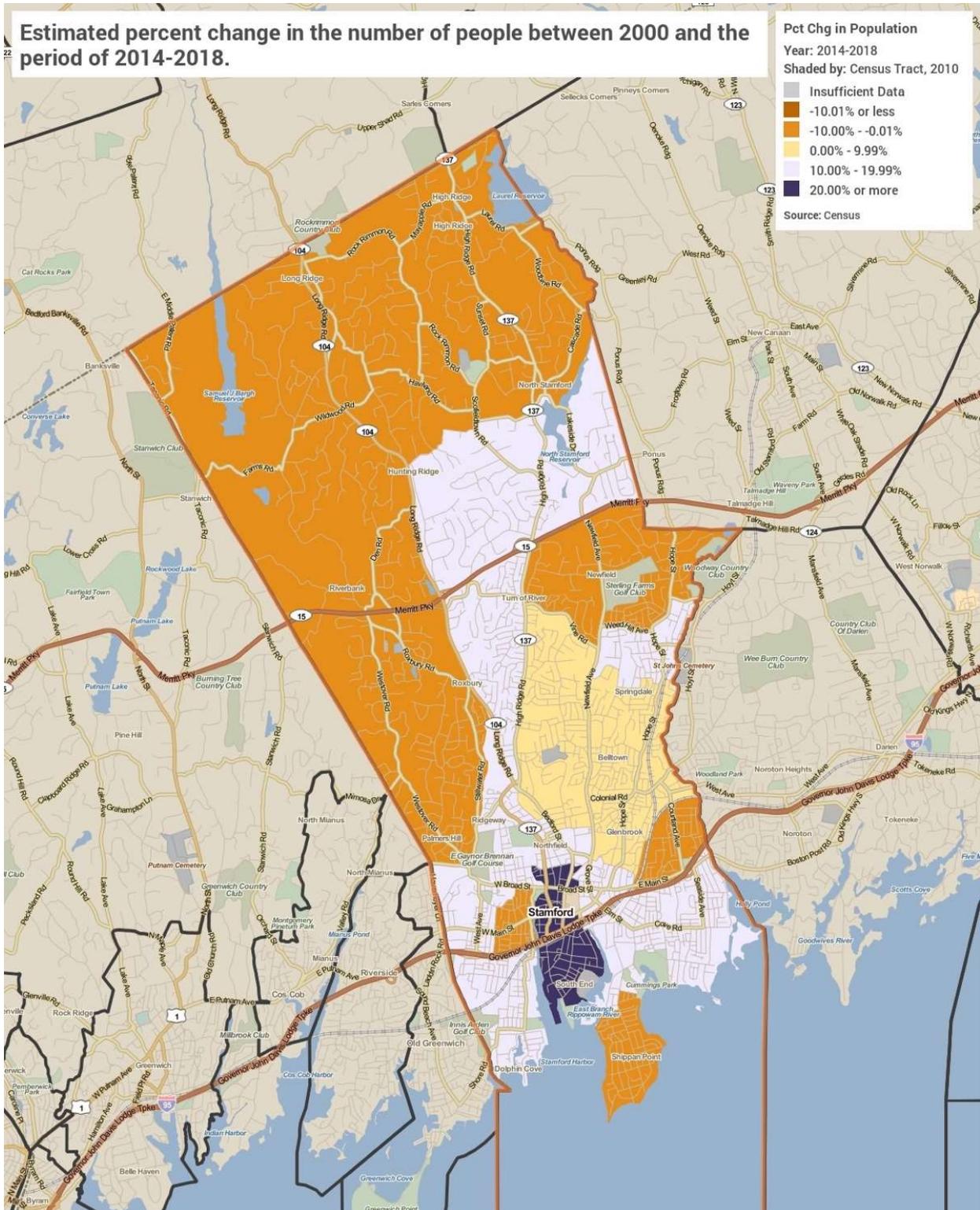


Population

Change in Population

Demo

Since 2000, the growth rate across the City has varied significantly. There are multiple tracts where the population decreased while elsewhere the population increased significantly, particularly in the downtown area.

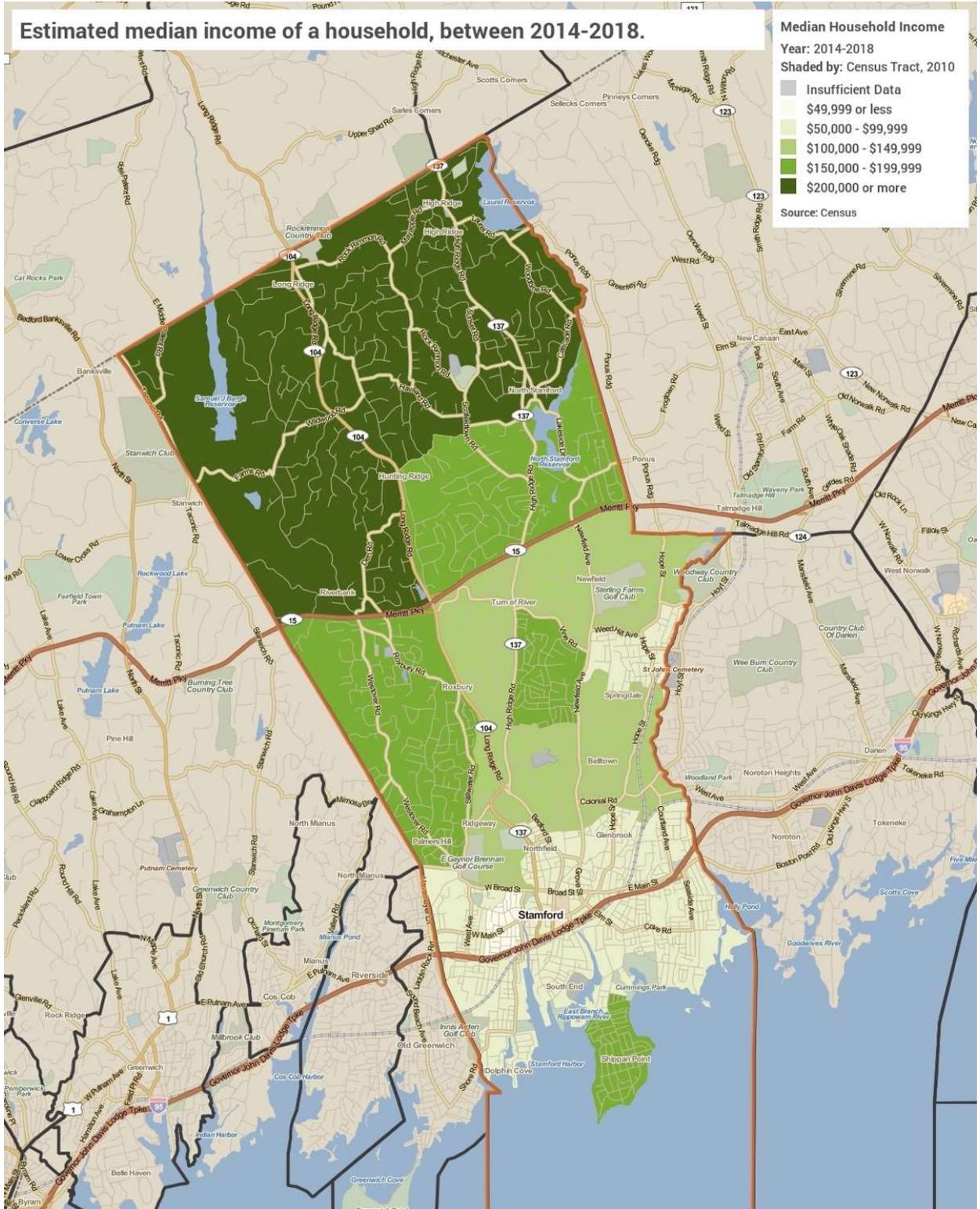


Population Growth

Median Household Income

Demo

In Stamford there appears to be a relationship between household income and part of the City a household lives in. The downtown area has a relatively low MHI, under \$50,000. Tracts in the northern area of the City have a median household income that is much higher, over \$200,000.

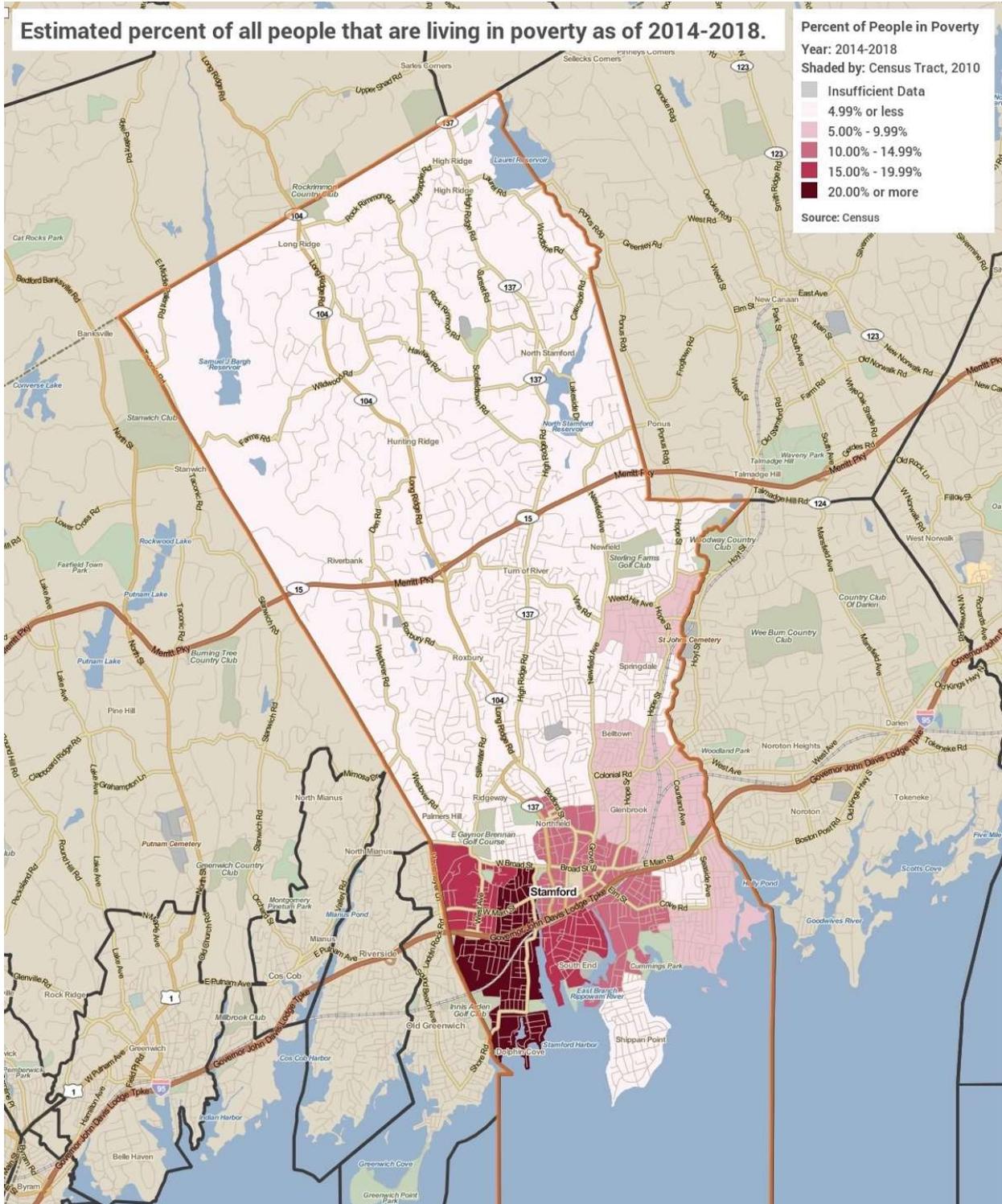


Median Household Income

Poverty

Demo

The map below displays the percentage of the population who live below the poverty level by census tract. Unsurprisingly, areas that have higher median income tend to have lower levels of poverty. In tracts with the highest median household income the poverty rate is less than 5%. On the other end of the spectrum, the lowest MHI tract had a poverty rate over 20%.



Poverty Rate

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	9,110	7,890	3,275	4,245	23,185
Small Family Households	3,030	3,500	1,210	1,835	11,695
Large Family Households	475	740	385	495	1,445
Household contains at least one person 62-74 years of age	2,470	2,485	2,185	1,080	5,170
Household contains at least one person age 75 or older	1,635	1,705	815	495	2,140
Households with one or more children 6 years old or younger	1,520	1,515	475	715	3,710

Table 6 - Total Households Table

Alternate Data Source Name:
2012-2016 CHAS
Data Source Comments:

The above table breaks down family dynamics and income in the jurisdiction using 2016 CHAS data. The two factors correlated with a higher income is family size and presence of elderly residents. Households in the >100% HAMFI group have the highest rate of small family households and lowest rate of households with a person over the age of 62 present.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	155	140	45	85	425	80	20	0	0	100
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	105	240	20	30	395	50	0	4	0	54
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	365	355	160	105	985	30	70	15	55	170
Housing cost burden greater than 50% of income (and none of the above problems)	3,235	1,090	155	60	4,540	2,080	1,735	285	430	4,530
Housing cost burden greater than 30% of income (and none of the above problems)	1,040	1,860	780	560	4,240	365	940	585	675	2,565

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	325	0	0	0	325	130	0	0	0	130

Table 7 – Housing Problems Table

Alternate Data Source Name:
2012-2016 CHAS
Data Source
Comments:

Housing Needs Summary

The table above gives an overview of housing problems in the City. Using 2016 CHAS data, it provides the numbers of households experiencing each category of housing problem broken down by income ranges (up to 100% AMI) and owner/renter status.

Cost burden is clearly the biggest housing problem in the City in terms of sheer numbers – a common trend in many communities across the state and nation today. According to the 2016 CHAS data there were 8,780 renters and 7,195 homeowners in the 0% to 100% AMI range spending more than 30% of their income on housing costs.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,900	3,680	1,160	845	10,585	2,610	2,765	895	1,160	7,430
Having none of four housing problems	1,065	805	735	1,135	3,740	80	640	490	1,105	2,315

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	325	0	0	0	325	130	0	0	0	130

Table 8 – Housing Problems 2

Alternate Data Source Name:

2012-2016 CHAS

Data Source

Comments:

Severe Housing Problems

The above table shows households with at least one severe housing problem broken out by income and occupancy. The trend in the data is simply the lower the income in a household, the greater presence of severe housing problems. Over 82% of renters and nearly 93% of home owners in the 0-30% AMI group have at least one housing problem. For residents earning between 80% and 100% AMI, only 42.7% of renters and 51.2% of home owners have a housing problem.

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,225	1,860	330	4,415	480	975	370	1,825
Large Related	340	405	40	785	135	210	100	445
Elderly	1,100	405	55	1,560	1,105	660	105	1,870
Other	1,435	720	405	2,560	601	380	130	1,111
Total need by income	5,100	3,390	830	9,320	2,321	2,225	705	5,251

Table 9 – Cost Burden > 30%

Alternate Data Source Name:

2012-2016 CHAS

Data Source

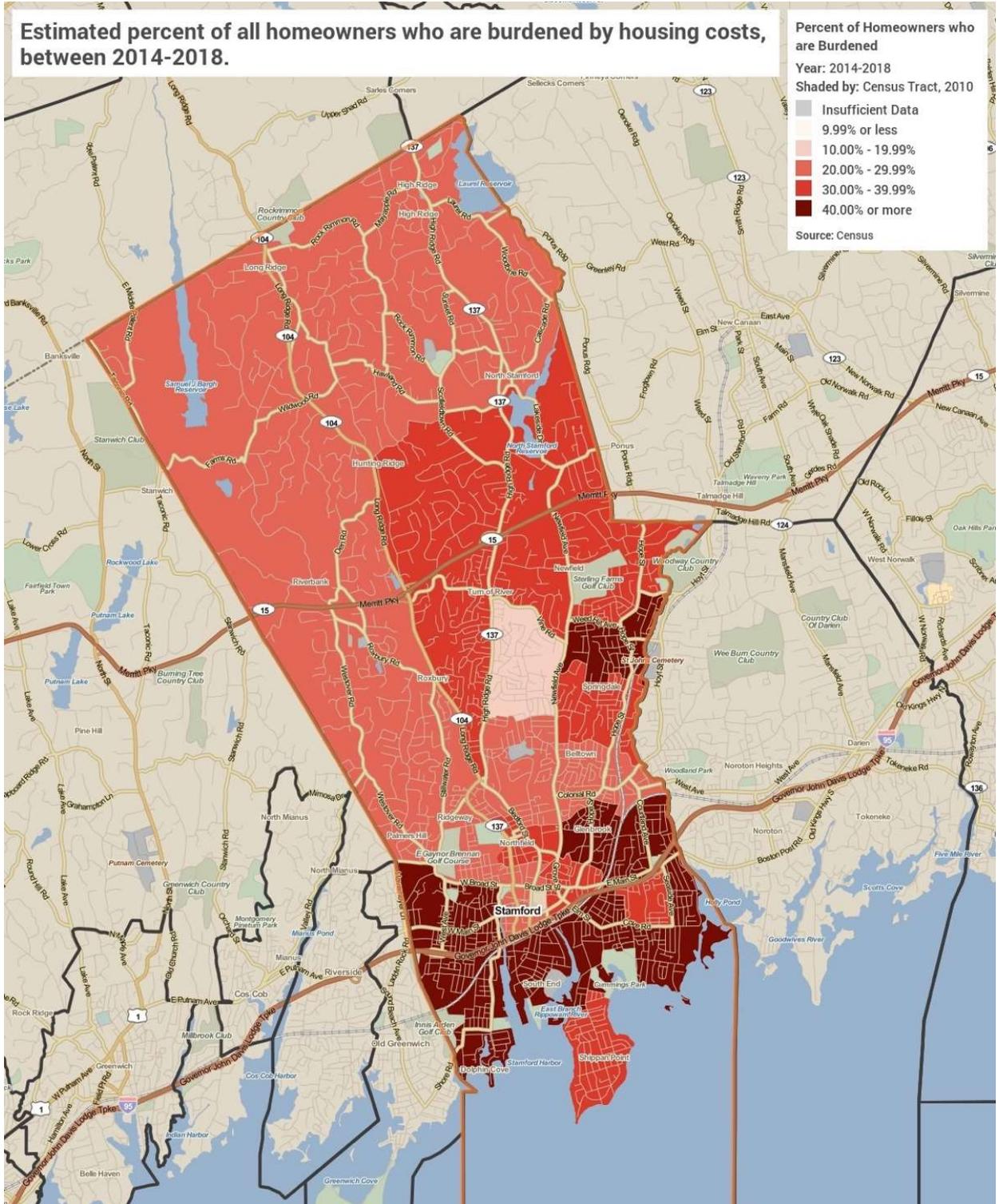
Comments:

The table above displays 2016 CHAS data on cost-burdened households in the City for the 0% to 80% AMI cohorts. HUD defines cost-burden as paying more than 30% monthly income on housing costs.

Housing Cost-Burdened

The following maps below display the percentage of the population who are cost-burdened by census tract using data from the 2014-2018 American Community Survey 5-Year Estimates. In some areas of the town the cost burden rate for homeowners is very high, over 40%. There are very few areas where the cost burden rate is less than 20%.

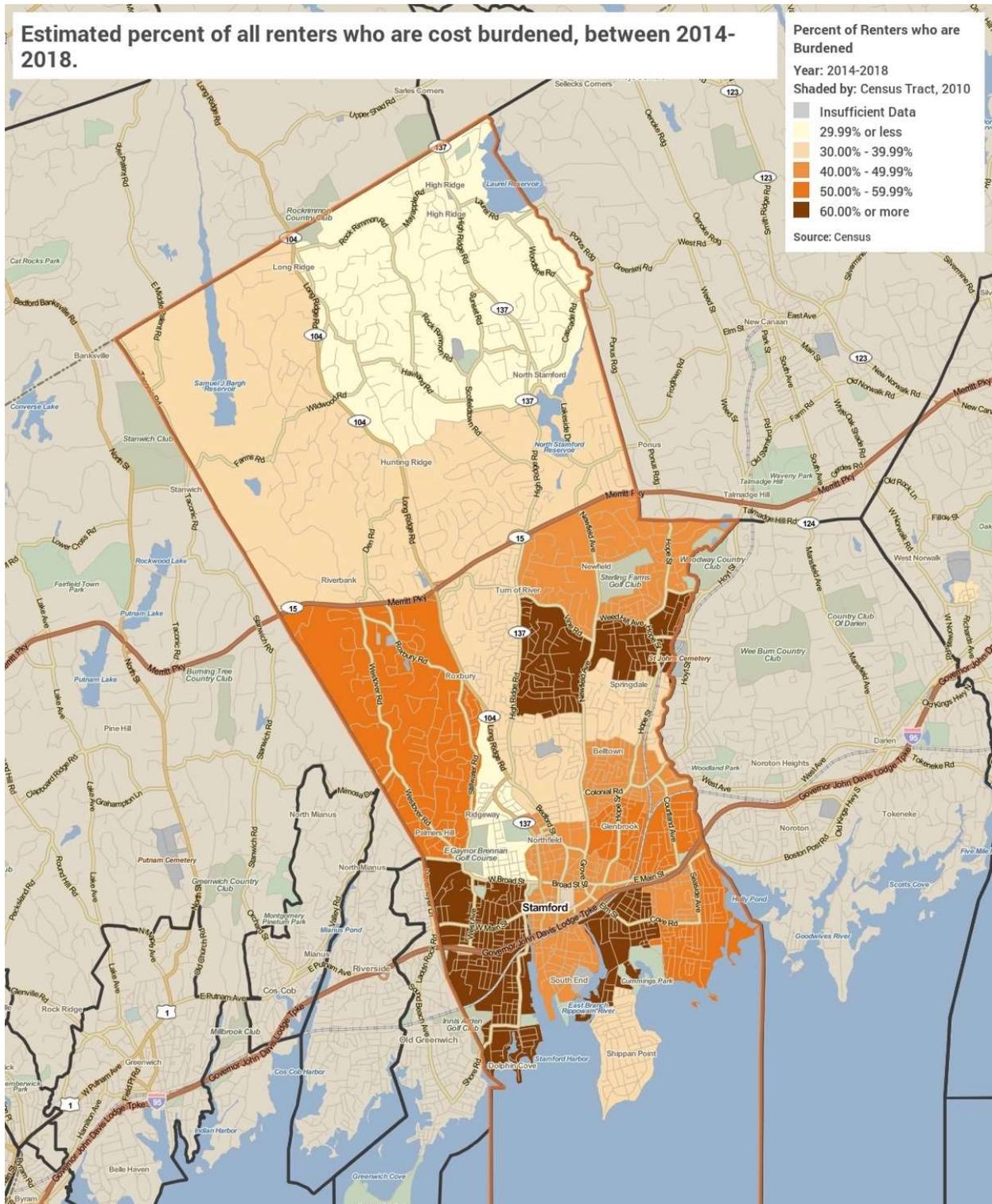
Source: 2014-2018 American Community Survey 5-Year Estimates



Cost-Burdened Homeowners

Renter Cost-Burdened

Cost burdened renters show a similar geographic distribution as home owners. The areas with high cost burden among renters report 60% or more while the lowest report under 30%.



Cost-Burdened Renters

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,735	615	70	2,420	455	655	85	1,195
Large Related	270	10	0	280	100	195	30	325
Elderly	620	215	0	835	835	410	60	1,305
Other	935	300	90	1,325	460	235	80	775
Total need by income	3,560	1,140	160	4,860	1,850	1,495	255	3,600

Table 10 – Cost Burden > 50%

Alternate Data Source Name:
2012-2016 CHAS
Data Source
Comments:

Severe Cost Burden

The data presented above show the severe cost burden in the City, which is defined as paying more than 50% of household income on housing cost.

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	435	625	50	115	1,225	40	70	14	55	179
Multiple, unrelated family households	0	14	130	0	144	40	0	10	0	50
Other, non-family households	40	0	0	20	60	0	0	0	0	0
Total need by income	475	639	180	135	1,429	80	70	24	55	229

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:
2012-2016 CHAS
Data Source
Comments:

Overcrowding

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room and a severely overcrowded household as one with more than 1.50 occupants per room. This type of condition is fairly rare but can be seen in both renter and homeowner households.

In the following table, households with children are much more present in renter households and in particular lower AMI categories.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	1,305	1,210	380	2,895	215	305	95	615

Table 12 – Crowding Information – 2/2

Alternate Data Source Name:
2012-2016 CHAS
Data Source
Comments:

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

According to the 2014-2018 ACS 5-Year Estimates 30.7% of occupied housing units in Stamford are single person households. This equates to approximately 15,713 households. Renters are more likely to live in a single-person household than homeowners. Approximately 33.4% of renter-occupied units are single-person households as compared to 28.2% of owner-occupied households.

Elderly residents who live alone may be in particular need of housing assistance. They are often on a fixed income and need assistance to maintain autonomy. In Stamford, approximately 44% of all households with someone over the age of 65 are single-person households, 6,467 people.

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

Disability

In Stamford there are approximately 10,463 individuals who have a disability. They represent 8.1% of the population. American Indian and Alaska Native residents are more likely than other racial or ethnic groups to report a disability. However, this population is relatively small. There are only 438 residents in this racial group. The disability rate is highest for older residents, which isn't surprising as disabilities become more prevalent as people age. There are over 5,000 residents over the age of 65 with a disability. Elderly residents with a disability are the most likely to need housing assistance.

Survivors of Rape and Domestic Violence

Determining the need for housing support for this group of residents is incredibly difficult. Domestic violence and sexual crimes are grossly underreported due to fear of retaliation or a lack of trust in the justice system. According to a 2016 analysis conducted by the US Justice Department, nearly 80 percent of all rapes and sexual assaults go unreported. According to the 2018 FBI Uniform Crime Report there were 21 rapes reported to the FBI in the City of Stamford. Given the low reporting rate it is reasonable to assume that over 100 rapes occurred within the City that year.

According to the 2019 report “When Men Murder Women” by the Violence Policy Center, Connecticut has the thirty-ninth highest homicide rate of women by men in the United States. The City of Stamford has several centers dedicated to the victims of domestic violence to assist residents. The Stamford Police Department includes a Family Services division that specifically addresses domestic violence. The Justice Department estimates that 1.3% of women experience domestic violence annually. Which would translate to approximately 840 women in the City of Stamford. Given the serious nature of these crimes and how common underreporting is, it is estimated that over 1,000 households in the City may need housing assistance to escape violent circumstances.

What are the most common housing problems?

Like many communities across the country, cost burdened residents is the most common housing problem. When residents pay over 30% of their income to housing costs they are at an increased risk of homelessness and substandard living conditions. Resources spent on housing become unavailable for transportation, health care, childcare, and education. All these factors reinforce each other creating an economic situation that is difficult to get out of. High housing costs reduce the availability of reliable transportation which prevents access to new economic opportunities which then makes it difficult to earn enough money to cover housing expenses.

According to the 2014-2018 American Community Survey 5-Year Estimates, there are approximately 21,676 cost burdened households in the City, making up 47.5%. Renters are much more likely to be cost burdened, approximately 53.7% pay over 30% of their income towards housing. Homeowners are slightly better off but still 47.9% of those with a mortgage and 27.4% of those without a mortgage are cost burdened. This points to the current housing supply being either too small or too expensive.

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

Housing problems tend to be more prevalent in low-income neighborhoods. An analysis of race, ethnicity, income and housing problems is conducted in MA-50.

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

Demo

HUD defines extremely low-income households as households that earn 0-30% AMI (area median income), and severe housing cost burden as housing expenses that are greater than 50% of income.

As indicated in 2016 CHAS data in Housing Needs Summary Tables, the lack of affordable housing is by far the greatest housing problem for extremely low-income households and families with children in the region. For extremely low-income households, there are 5,410 households with severe housing cost burden greater. These households are at imminent risk of becoming homeless, particularly the renter households. Furthermore, there are 1,520 extremely low-income households with children in the City, the majority of which are renters.

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

The City of Stamford does not provide specific estimates of at-risk populations.

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

The factors that contribute to an increased risk of homelessness are as varied as the populations served by the programs available to address them. Lack of sufficient income or the employment stability needed to generate adequate income is a key element. Health issues (both mental and physical) and the lack of education or having job skills that aren't valued or needed by employers can heavily influence the amount of income available to pay for a family's housing. Household breakup/lack of familial relationships, substance abuse, criminal background, prior evictions, high levels of debt and the loss of benefits (such as housing vouchers or Temporary Assistance for Needy Families (TANF)) can adversely impact the stability of a family's housing situation. Incidences of domestic violence or human trafficking can also greatly diminish one's ability to afford housing, especially when children are involved.

Discussion

N/A

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

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

Introduction

A review of Housing Assessment data provided by HUD provides information that can be analyzed and used to determine any racial or ethnic groups that may have a proportionally higher housing need than other ethnic groups in the community. HUD has determined that a proportionally higher need exists when the percentage of persons in a given category is at least 10 percentage points higher than the percentage of persons in the category as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,510	1,145	455
White	2,860	425	215
Black / African American	1,910	370	100
Asian	315	15	50
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	2,405	270	90
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,445	1,445	0

Demo

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	2,655	895	0
Black / African American	1,150	235	0
Asian	205	24	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	2,410	265	0
0	0	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,055	1,225	0
White	1,195	715	0
Black / African American	230	105	0
Asian	95	110	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	525	300	0
0	0	0	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,005	2,240	0
White	1,230	1,035	0
Black / African American	310	540	0
Asian	75	200	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	375	435	0
0	0	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four housing problems are:

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

Discussion

Extremely Low-Income Households (<30% AMI)

In Stamford, approximately 86.8% of extremely low-income households have at least one housing problem. There are no racial or ethnic groups that are disproportionately impacted in this group.

Very Low-Income Households (30%-50% AMI)

Compared to extremely low-income households, very low-income households have a lower overall rate of housing problems with 74.8%. There are three groups disproportionately impacted. Approximately 89.5% of Black or African American households, 90.1% of Pacific Islander households, and 100% of Hispanic report a housing problem in this income group.

Low Income Households (50%-80% AMI)

In this income group 62.7% of all households have at least one housing problem. There are no groups with a disproportionately high rate of cost burden.

Moderate Income Households (80%-100% AMI)

Demo

Moderate income households have noticeably lower rates of housing problems. Only 47.2% of the City's households in this group have a housing problem. There are no groups with a disproportionately high rate of cost burden.

Conclusion:

Overall, only Very Low-Income Households had housing problems. There are three groups disproportionately impacted: Black or African American, Pacific Islander, and Hispanics.

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

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

Introduction

A review of Housing Assessment data provided by HUD provides information that can be analyzed and used to determine any racial or ethnic groups that may have proportionally higher housing needs than other ethnic groups in the community. HUD has determined that a proportionally higher need exists when the percentage of persons in a given category is at least 10 percentage points higher than the percentage of persons in the category as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,105	2,550	455
White	2,380	900	215
Black / African American	1,325	955	100
Asian	305	25	50
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	2,070	600	90
0	0	0	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,645	4,245	0
White	1,570	1,980	0
Black / African American	545	840	0
Asian	165	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,330	1,340	0
Other	0	0	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	690	2,590	0
White	405	1,500	0
Black / African American	35	295	0
Asian	50	150	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	195	630	0
Other	0	0	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	770	3,480	0
White	495	1,770	0
Black / African American	70	780	0
Asian	40	235	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	140	665	0
Other	0	0	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

*The four severe housing problems are:

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

Discussion

Extremely Low-Income Households

In Stamford, approximately 70.5% of extremely low-income households have at least one severe housing problem. There is one racial group with a disproportionately impacted by severe housing problems in this income group, Asian households. Nearly 92.5% of extremely low-income Asian households report a severe housing problem.

Very Low-Income Households

When compared to extremely low-income households, very low-income households have a significantly lower rate of severe housing problems. Approximately 46.2% of all households in this income group have a severe housing problem and one racial or ethnic group is disproportionately impacted. Approximately 75% of Asian households report a severe housing problem.

Demo

Low Income Households

Jurisdiction-wide 21% of low-income households have at least one severe housing problem. There are no groups that are disproportionately impacted by severe housing problems.

Moderate Income Households

Moderate income households have the lowest rate of severe housing problems at 18.1%. There are no groups that are disproportionately impacted by severe housing problems.

Conclusion

Severe housing problems disproportionately impact Asian households in two income groups, very low-income and low-income households. There are no other groups disproportionately impacted.

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

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

Introduction:

A review of Housing Assessment data provided by HUD provides information that can be analyzed and used to determine any racial or ethnic groups that may have a proportionally higher housing need than other ethnic groups in the community. HUD has determined that a proportionally higher need exists when the percentage of persons in a given category is at least 10 percentage points higher than the percentage of persons in the category as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	26,920	10,135	10,105	550
White	18,015	5,190	4,735	310
Black / African American	2,405	1,935	1,785	100
Asian	2,855	305	555	50
American Indian, Alaska Native	50	20	0	0
Pacific Islander	20	0	0	0
Hispanic	3,130	2,670	2,960	90

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:

2012-2016 CHAS

Data Source Comments:

Discussion:

According to 2016 CHAS data, approximately 42.9% of all households in Stamford spend 30% or more of their income on housing costs. These households are considered “cost burdened”. There are two racial or ethnic groups that are disproportionately cost burdened. Approximately 60.7% of Black or African-American and 64.3% of Hispanic households are cost burdened.

Households that spend 50% or more of their income are considered severely cost burdened and have higher levels of housing instability and likely need additional support. In Stamford, 21.4% of all households are severely cost burdened. One group is disproportionately severely cost burdened. Nearly 34% of Hispanic households are severely cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The following racial and ethnic groups have a disproportionately greater need in their income group. The group that stands out the most is Hispanic households who often face disproportionate challenges when compared to other groups.

Housing Problems

ELI – None

VLI – Black or African American, Pacific Islander, and Hispanic

LI – None

MI – None

Severe Housing Problems

ELI – Asian

VLI – Asian

LI – None

MI – None

Cost Burden

Cost Burden – Black or African American, Hispanic

Severe Cost Burden – Hispanic

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

All known needs for ethnic groups with disproportionate needs have been identified.

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

Concentration of residents based on race, ethnicity, and income are discussed in MA-50.

NA-35 Public Housing – 91.205(b)

Introduction

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly and persons with disabilities. Public housing comes in all types and sizes from scattered single-family homes to high-rise apartment developments for elderly families. The US Department of Housing and Urban Development (HUD) administered Federal aid to the housing authority to manage public housing for low-income families at affordable rates.

The Housing Choice Voucher Program (HCV) provides "tenant-based" rental assistance for assisting low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. A housing subsidy is paid to the landlord/management directly by the housing authority on behalf of the participating voucher holder family, then the family pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. HCV also authorizes a variety of "project-based" rental assistance programs, under which the owner reserves some or all of the units in a building for low-income tenants. A tenant who leaves a subsidized project will lose access to the project-based subsidy.

The City is served by Charter Oak Communities, the local PHA operating in Stamford.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	52	493	1,534	76	1,458	0	0	0

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	10,944	17,882	18,502	15,637	18,651	0	0
Average length of stay	0	3	8	6	2	6	0	0
Average Household size	0	1	2	2	1	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	4	192	374	27	347	0	0
# of Disabled Families	0	8	107	222	17	205	0	0
# of Families requesting accessibility features	0	52	493	1,534	76	1,458	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	11	143	597	24	573	0	0	0
Black/African American	0	41	313	920	52	868	0	0	0
Asian	0	0	3	7	0	7	0	0	0
American Indian/Alaska Native	0	0	6	6	0	6	0	0	0
Pacific Islander	0	0	28	4	0	4	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	10	131	396	15	381	0	0	0
Not Hispanic	0	42	362	1,138	61	1,077	0	0	0

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

Table 25 – Ethnicity of Public Housing Residents by Program Type

Demo

Data Source: PIC (PIH Information Center)

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

The housing authority continues to make assessments of all of its public housing and works to stay in compliance with Section 504. New units continue to be constructed but there is still a great need. Rising housing prices across the area price out many residents who don't have access to publicly supported housing, particularly residents with a disability or those on a fixed income.

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

The most immediate needs for residents of Public Housing and Housing Choice voucher holders is a larger supply of affordable units, particularly accessible units. Transportation options are limited for many residents and without a larger supply of units in a variety of neighborhoods there will continue to be great need in the community. Households in public housing have an average annual income of \$17,882 and households with HCV with \$18,502 – both well below the median income in the City.

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

Eligible public housing residents and HCV program participants are low- or moderate-income and/or special needs and are in particular need of affordable housing. Without the assistance of publicly supported housing, public housing residents would be at imminent risk of homelessness.

Discussion

N/A

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homelessness is a particularly troublesome and complex issue that most communities across the United States must address. A major reason that homelessness is difficult to address is that it has many causes with overlapping and interrelated variables. The cause of any single person's homelessness often lies, not in a single factor, but at the convergence of many events and conditions. From one perspective, homelessness is an economic problem caused by unemployment, lack of affordable housing options, or poverty. From another perspective, homelessness is a health issue because many homeless persons struggle with mental illness, physical disabilities, HIV/AIDS, substance abuse, or a combination of those health factors. A third perspective is to view homelessness as a social problem with factors such as domestic violence, educational attainment, and race lying at the root. In reality, homelessness can be caused by all of these issues and they are often interrelated. Due to this complexity, addressing homelessness requires a collaborative and community-based approach.

The Stewart B. McKinney Homeless Assistance Act defines the "homeless" or "homeless individual" or "homeless person" as an individual who lacks a fixed, regular, and adequate night-time residence; and who has a primary night-time residence that is:

- A supervised publicly or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings

Below is data taken by the Connecticut 2019 PIT Count for Stamford. The PIT Count is a snapshot of the homeless population in any given night in the City and helps to describe the characteristics of homelessness in the area. The PIT Count survey was taken on the night of January 22, 2019.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	104	0	0	0	0	0
Persons in Households with Only Children	1	0	0	0	0	0
Persons in Households with Only Adults	90	38	0	0	0	0
Chronically Homeless Individuals	4	7	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	2	1	0	0	0	0
Unaccompanied Child	1	0	0	0	0	0
Persons with HIV	1	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: CT 2019 PIT Count Stamford. Data was taken from the 2019 PIT Dashboard. The PIT survey was taken on the night of January 22, 2019.

Indicate if the homeless population is: Has No Rural Homeless

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

Chronically Homeless Individuals and Families:

The chronically homeless are more likely to be those experiencing a disability (physical and cognitive), have a history of substance abuse, and be unsheltered. According to the 2019 PIT Count, there were 11 total persons that were reported as chronically homeless. Seven of the chronically homeless were unsheltered.

Households with Adults and Children:

There were 104 households with adults and children that experienced homelessness in the PIT Count. Working to get children out of homelessness will greatly improve the future success of the children in area. Increased exposure to homelessness will cause harm to the development of children due to the lack of housing stability and the increased risk of living in poverty which include hunger and the lack of access to healthcare.

Veterans and Their Families:

Veterans are more likely to have a disability than non-veterans and this is also true for homeless veterans. There were 3 veterans identified in the PIT Count, and 1 was unsheltered.

Unaccompanied Youth:

Youth that are alone and experiencing homelessness may be caused from any issue such as a death in the family or fleeing from a crisis. Similar to households with adults and children, increased exposure to homelessness will cause harm to the development of children due to the lack of housing stability and the increased risk of living in poverty which include hunger and the lack of access to healthcare. According to the 2019 PIT Count, there was only one unaccompanied youth under 18.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	55	20
Black or African American	110	18
Asian	6	0
American Indian or Alaska Native	4	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	79	10
Not Hispanic	116	28

CT 2019 PIT Count Stamford. Data was taken from the 2019 PIT Dashboard. The PIT survey was taken on the night of January 22, 2019. The table above does not include Multiple Races, however there were 20 sheltered and no unsheltered from the race group.

Data Source
Comments:

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

See above.

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

*White:*Nearly 75 persons experiencing homelessness are White, the largest racial or ethnic group in the population. Nearly 27% of this group are sheltered.

*Black or African American:*The largest homeless racial group is Black or African American, 128 persons. Approximately 14% are unsheltered

The remaining racial groups make up less than 5% of the population experiencing homelessness.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Sheltered homeless are persons who are residing in emergency shelter units or transitional housing. The majority of the participants in the 2019 PIT count were sheltered.

Unsheltered homeless are much more difficult to count, and it’s probably that this group has been under reported. Unsheltered homeless reside in places not meant for human habitat. These places include cars, abandoned buildings and on the streets. The majority of unsheltered homeless persons living alone were adults without children.

Discussion:

N/A

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

Introduction:

There are four primary groups with non-homeless special needs in the jurisdiction. They are the elderly and frail elderly, those with HIV/AIDS and their families, those with alcohol and/or drug addiction, and individuals with mental or physical disabilities. This section will explain who they are, what their needs are, and how the County is accommodating or should accommodate these needs.

Describe the characteristics of special needs populations in your community:

Elderly: The elderly population faces increased challenges and providing decent, affordable housing is incredibly important. It is medically beneficial and emotionally comforting for this population to remain in a familiar setting and, as a result, strong emphasis is placed on the elderly maintaining a lifestyle that is as independent as possible. Unfortunately, the elderly population is often on a limited income and/or has a disability, which puts financial pressure on them that reduces independence. As prices throughout the community inflate, the elderly population generally lacks the ability to increase their income to match.

According to the most recent data available, there are approximately 18,545 residents over the age of 65 in the Town, making up 14.4% of the population. Approximately 6,452 residents over the age of 65 have a disability, or 29.4%. Approximately 11.3% of residents 65 or older are below the poverty level.

HIV/AIDS: See discussion below in this section.

Alcohol and Drug Addiction: Gathering accurate data about alcohol and drug addiction within a community is difficult. Addiction often goes unrecognized because people don't seek help for fear of facing criminal charges. Usually, only when someone overdoses, gets arrested, or seeks treatment are they counted in statistics.

According to the Connecticut Department of Mental Health and Addiction Services, the City of Stamford has multiple substance use services. The services include Multidimensional Family Therapy, Adolescent Community Reinforcement/Assertive Continuing Care, Family Based Recovery, Multisystem Therapy, PSB and Recovery Specialist Voluntary Program. Statewide, there are over 100,000 residents in statewide programs, 59% of which are male. Heroin and other opioids was the most common primary drug for admission with alcohol being a close second, 37% and 36%, respectively.

Disability: As noted above, in Stamford there are approximately 10,463 individuals who have a disability. They represent 8.1% of the population. American Indian and Alaska Native residents are more likely than other racial or ethnic groups to report a disability. However, this population is relatively small.

There are only 438 residents in this racial group. The disability rate is highest for older residents, which isn't surprising as disabilities become more prevalent as people age. There are over 5,000 residents over the age of 65 with a disability. Elderly residents with a disability are the most likely to need housing assistance.

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

Elderly: The types of housing for the elderly and frail elderly vary depending on the special features and/or services needed to meet the needs of older residents. Factors that must be considered in developing housing for the elderly include location, services and amenities, proximity to health care, shopping, and other services, affordability, and ease of upkeep. Various categories of housing for the elderly are independent and assisted living, nursing homes and other support facilities such as adult day care, respite and senior center facilities.

Elderly persons generally need an environment that provides several areas of assistance or convenience. First, the availability of healthcare is important, since health problems generally become more prevalent with age. Second, availability of assistance with daily activities such as shopping, cooking, and housekeeping becomes more important as people grow older. Also, the proximity of basic goods and services such as those provided by pharmacies and grocery stores grows increasingly important as a person becomes less able to drive or walk. The availability and ease of transportation are important for the same reason. Safety is a growing concern, since older Americans – especially those living alone – are particularly vulnerable to crime and financial exploitation. Lastly, weather and climate are considerations for many elderly people, since these factor into both ease of transit as well as health.

Providing secure, safe, affordable, and stable housing for the elderly population is vitally important for this population. There are many factors that contribute to a healthy environment for the elderly including, but not limited to, access to health care, shopping, and social networks. A robust public transportation network is incredibly beneficial to assisting the elderly remain active and independent. Additionally, elderly resident's homes may need modifications to assist with any disabilities that may develop as a result of aging.

Alcohol and Drug Addiction: Individuals with substance abuse problems need a strong network in order to stay healthy and sober. Their housing needs include sober living environments, support for employment, access to health facilities, and easy access to family and friend networks. Additionally, detoxification facilities are necessary when addiction is first recognized.

Disability: Individuals with disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their capabilities. Individuals with disabilities usually have a fixed income and have limited housing options. The individuals who have more independent skills tend to utilize subsidized housing options. Individuals requiring more support find residences in the public welfare funded community homes

either sharing settings or privately-owned personal care settings. Many individuals continue to reside with parents and families throughout adulthood. Regardless of the housing situation, a common thread is the need for continuous support services dependent of the level of capabilities.

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

According to the 2018 Connecticut Department of Public Health HIV Surveillance Program the City of Stamford had 11 new HIV diagnosis in 2018. Over 80% of the new infections were male and 63.6% were Black or African American. The most common transmission category is male and male sexual contact.

Discussion:

N/A

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The City of Stamford has identified the need for improved access to public facilities and has included a goal in the Strategic Plan:

1B Improve Access to Public Facilities

In this goal, the City will expand and improve access to public facilities through development activities for LMI persons and households and for special needs population (elderly, persons with a disability, victims of domestic abuse, etc.). Public facilities may include neighborhood facilities, community centers and parks and recreation facilities.

How were these needs determined?

The City of Stamford used a variety of methods to determine the needs for public facilities in the community. The City executed a public outreach program, consulted with key stakeholders in the area, utilized the City’s institutional knowledge, and used quantitative data to determine the best use of grant funds.

Describe the jurisdiction’s need for Public Improvements:

The City of Stamford has identified the need for the expansion and improvements of public infrastructure and has included a goal in the Strategic Plan:

1A Expand & Improve Public Infrastructure

For this goal, the City will expand and improve public infrastructure through development activities for LMI persons and households. Activities may include adding ADA compliance for curb ramps and sidewalks, street improvements and roadway expansion projects.

How were these needs determined?

The City of Stamford used a variety of methods to determine the needs for public improvements in the community. The City executed a public outreach program, consulted with key stakeholders in the area, utilized the City’s institutional knowledge, and used quantitative data to determine the best use of grant funds.

Describe the jurisdiction’s need for Public Services:

The City of Stamford has identified the need for public services for the LMI and special needs population and has included a goal in the Strategic Plan:

3A Provide Supportive Services for Special Needs

For this goal, the City will provide vital and essential supportive services for low income households and the special needs populations. Public services will target LMI citizens and may include services to address homelessness, persons with physical and mental health disabilities, the elderly, and the youth. Services may also include recreational programs for special needs populations, and education and health programs for special needs households.

How were these needs determined?

The City of Stamford used a variety of methods to determine the needs for public services in the community. The City executed a public outreach program, consulted with key stakeholders in the area, utilized the City's institutional knowledge, and used quantitative data to determine the best use of grant funds.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Throughout this section various housing market indicators and data points will be analyzed. Developing a picture of the current housing stock in Stamford begins by looking at trends in structure, age, price, and tenure. Additionally, housing supported by public funds and services that assist those facing homelessness are identified and analyzed. Included in this section is a look at economic development activities that impact the demand for housing units in Stamford, including business activity, labor force participation, unemployment, broadband access, and hazard mitigation.

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

Introduction

This section looks at the composition of Stamford's housing stock in terms of housing type and tenure. Details are provided based on the number of units in the structure, multifamily housing distribution within the jurisdiction, unit size and tenure, as well as an analysis of owner-occupied and renter occupied housing. The demand for housing is based on more than just the number of units. Units must match the needs of the population to match their family size and goals for both renters and homeowners.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	20,292	38%
1-unit, attached structure	3,882	7%
2-4 units	9,130	17%
5-19 units	4,906	9%
20 or more units	15,413	29%
Mobile Home, boat, RV, van, etc	37	0%
Total	53,660	100%

Table 27 – Residential Properties by Unit Number

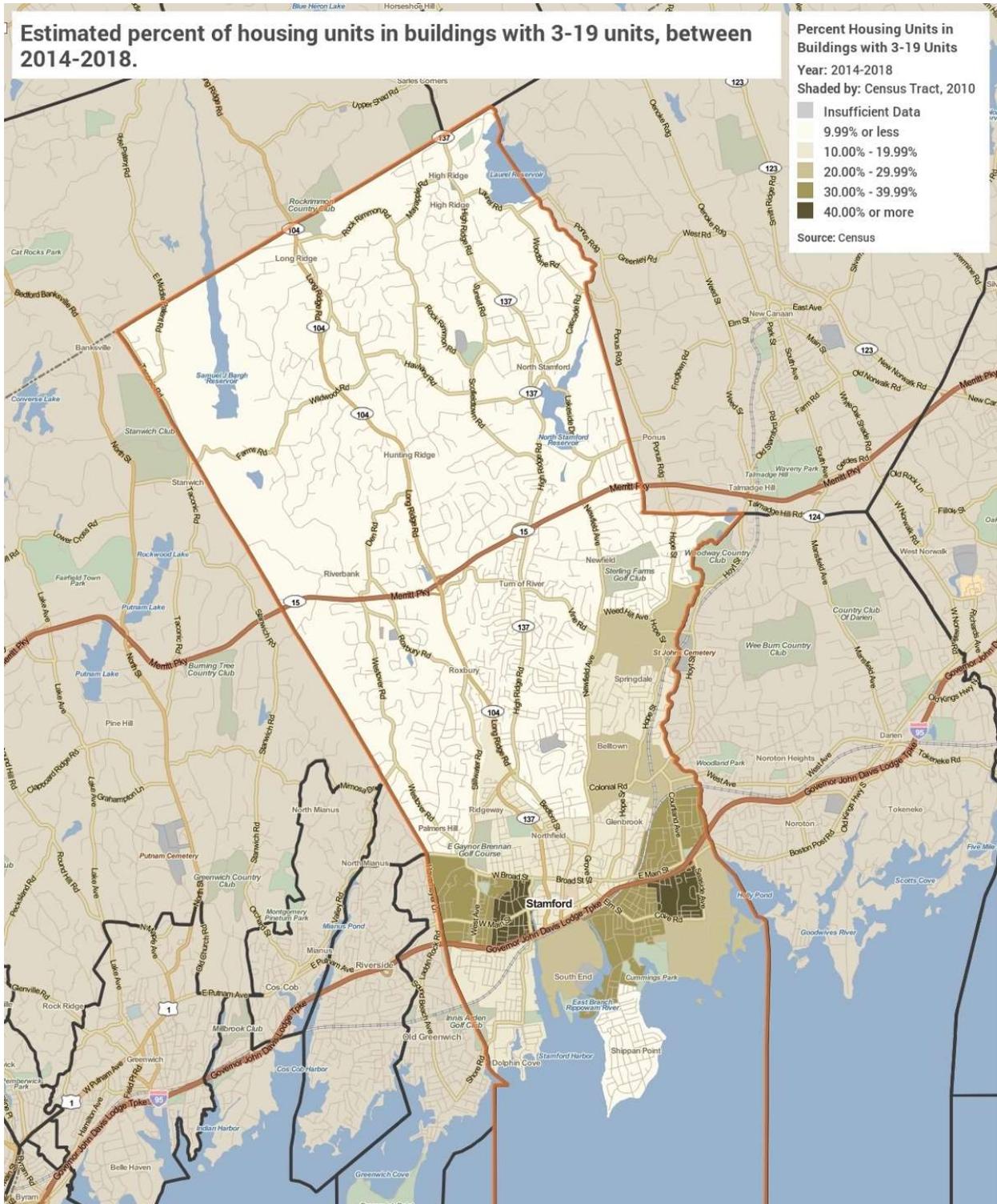
Alternate Data Source Name:
 2014-2018 ACS 5-Yr Estimates
 Data Source Comments:

The table above breaks down the City’s housing stock by the number of units in each structure and by structure type. The plurality of housing units are traditional single-family, detached homes making up 39% of all units. HUD defines multifamily as a unit with more than four units. By that definition approximately 38% of all units are multifamily. Unlike many communities, the City of Stamford has a relatively large stock of mid-sized properties with 2-20 units. This group is often referred to as the “Missing Middle” due to their scarcity in many communities. These middle-sized properties are important due to the relative affordability of them for low-income and first-time homeowners.

Multifamily Development Distribution

The following maps display the distribution of small, medium, and large multifamily developments in the jurisdiction. For the purposes of this section small multifamily units are buildings with 3-19 units, medium multifamily units are buildings with 20-49 units and large multifamily units are buildings with 50+ units.

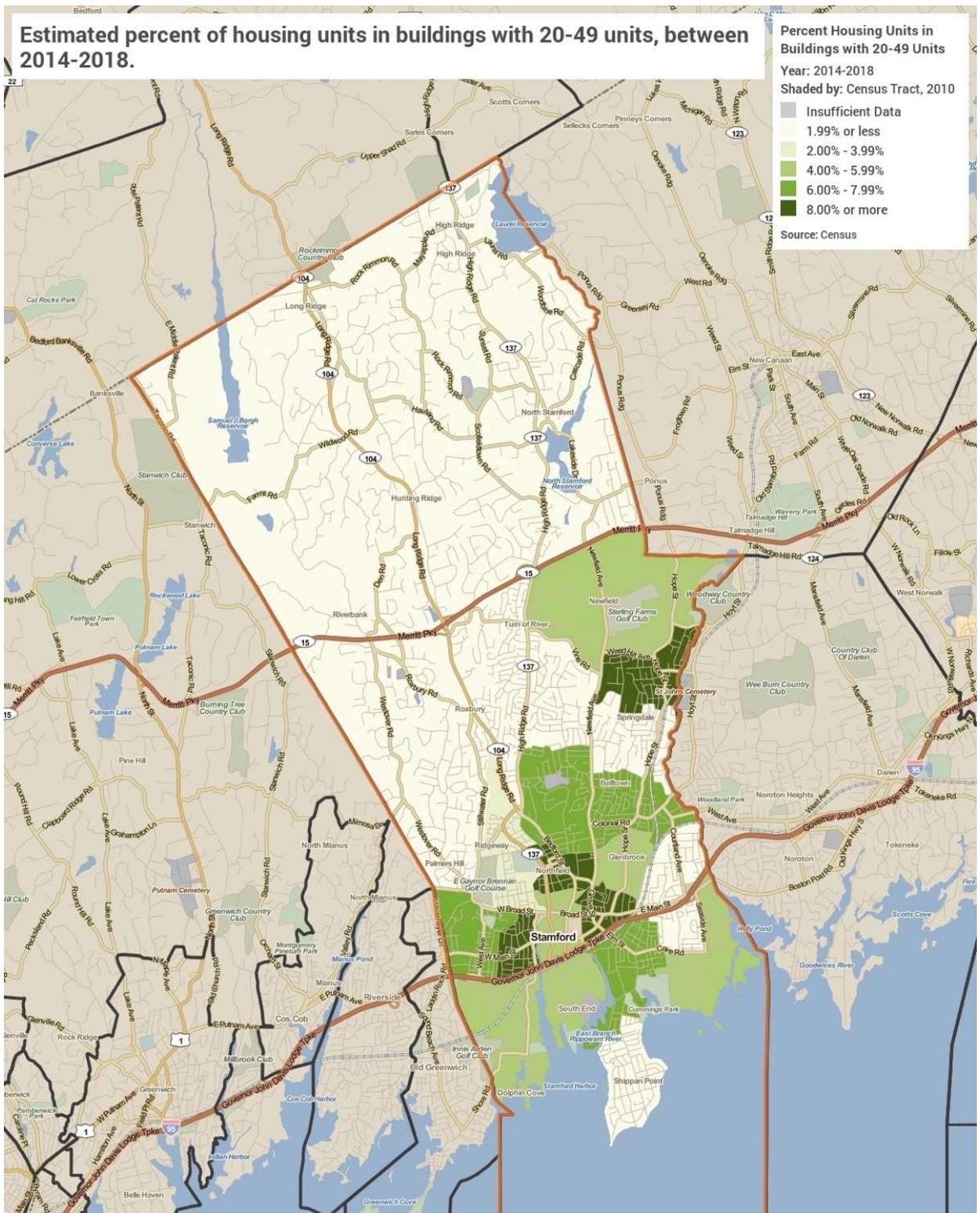
Small multifamily buildings provide fewer than 10% of the units in most tracts, particularly in the northern parts of Stamford. Tracts along I-95 are most likely to have small multifamily buildings. In two tracts over 40% of the housing units are in small buildings.



Small Multifamily Buildings

Medium Multifamily Buildings

Medium multifamily buildings are significantly less common than small multifamily buildings. Tracts with a relatively high number of medium buildings are rarely over 8%. There is a similar distribution pattern for these properties as there is for small buildings with a heavier concentration in the southern part of the City, particularly along I-95.



Medium Multifamily Buildings

Large Multifamily Buildings

Large multifamily buildings are only common in one part of Stamford. These units are heavily concentrated in the downtown area, particularly north of I-95 between the area around Highway 137 and Grove Street. Over 60% of the housing units in these high-density tracts are in large multifamily buildings.

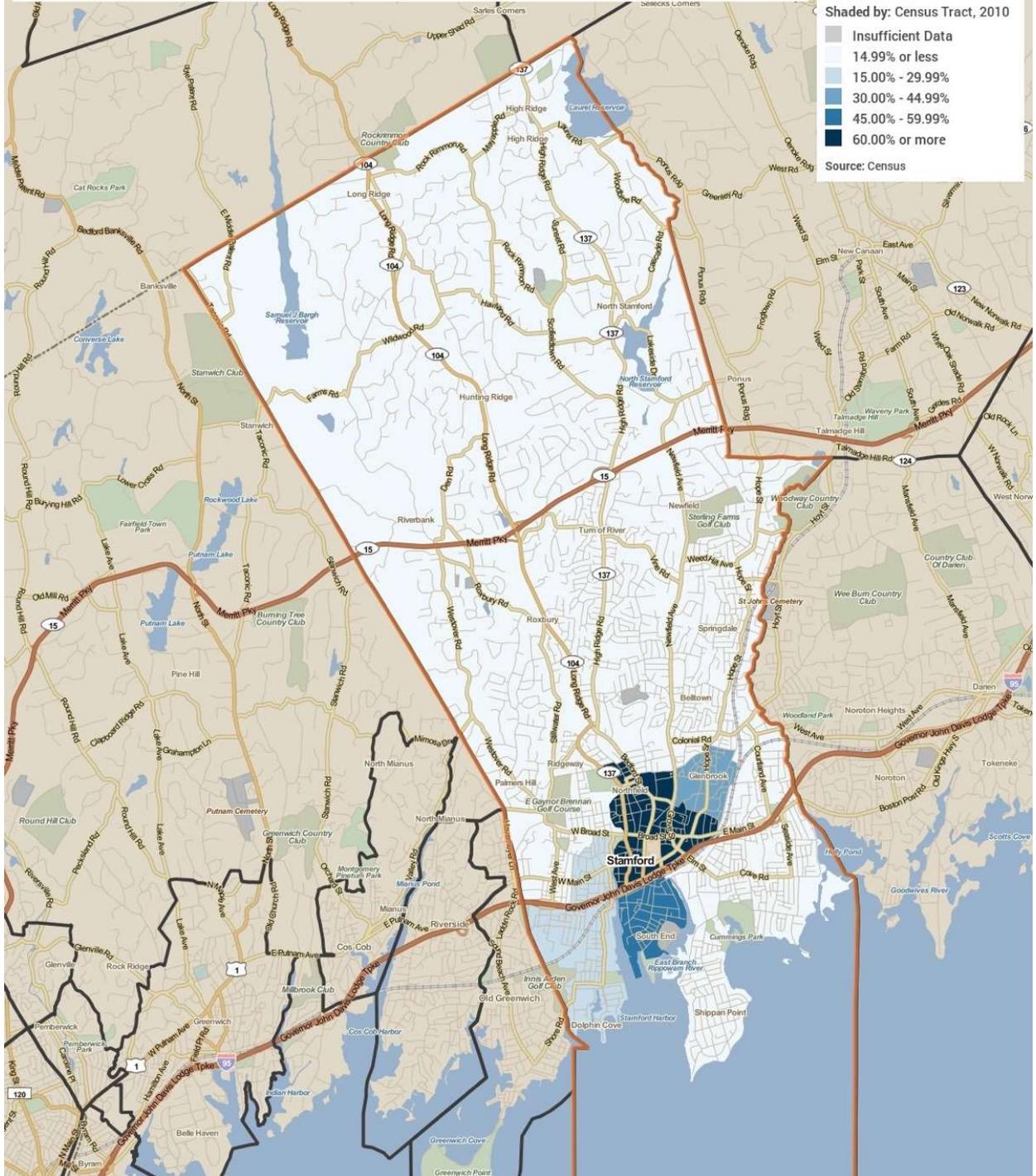
Estimated percent of housing units in buildings with 50 or more units, between 2014-2018.

Percent Housing Units in Buildings with 50+ Units

Year: 2014-2018
Shaded by: Census Tract, 2010

- Insufficient Data
- 14.99% or less
- 15.00% - 29.99%
- 30.00% - 44.99%
- 45.00% - 59.99%
- 60.00% or more

Source: Census



Large Multifamily Buildings

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	294	2%	3,368	15%
1 bedroom	3,472	13%	14,585	66%
2 bedrooms	12,139	47%	15,411	70%
3 or more bedrooms	36,521	139%	10,690	48%
Total	52,426	201%	44,054	199%

Table 28 – Unit Size by Tenure

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

In the City of Stamford, the size of units varies significantly between homeowners and renters. Large units with 3 or more bedrooms are much more common for homeowners than renters. Over 70% of owner-occupied units are large. Rental units tend to be more diverse in size with 2-bedrooms being the most common size, but still only include 34% of rental units.

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

The Community Development Block Grant Program (CDBG): The City of Stamford’s primary objective is the development of viable communities through decent housing, a suitable living environment, and economic opportunities. To achieve these goals the City has established the following program goals over the next 5 years for this Consolidated Plan:

- Homeowner Housing Rehabilitated: 250 Household Housing Unit

HOME Investment Partnership Program (HOME): In order to expand the supply of decent, save, secure and affordable housing to very low- and low-income households. The City has worked with key stakeholders in the community to establish the following goals over the next 5 years for this Consolidated Plan:

- Homeowner Housing Added: 10 Household Housing Unit
- Direct Financial Assistance to Homebuyers: 15 Households Assisted
- Rental units constructed: 10 Household Housing Unit
- Rental units rehabilitated: 250 Household Housing Unit

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

According to the HUD Multifamily and Section 8 database, there are currently 23 active contracts. Of these contracts there are five that have an overall expiration date before 2025. These contracts represent 247 affordable units.

Mapleview Tower/Stamford Elderly

Expires: 2020

Number of Units: 100 one-bedroom

Fairfield Commons I

Expires: 2020

Number of Units: 6 one-bedroom

Liberty Housing

Expires: 2021

Number of Units: 1 zero-bedroom, 11 one-bedroom

Martin Luther King Apartments

Expires: 2021

Number of Units:

22 one-bedroom

44 two-bedroom

22 three-bedroom

Eleanor Roosevelt Homes

Expires: 2022

Number of Units: 41 one-bedroom

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

According to the US Census, there are 53,660 housing units and 49,510 households in the City of Stamford. In terms of raw numbers there is plenty of housing units in the City, but these numbers do not take into account the availability of affordable units that meet the needs of individual households. Within the City, cost burden is a significant problem. Nearly 35.5% of homeowners and 51.1% of renters are cost burdened, which means these households are paying over 30% of their income on housing expenses. This points to a need for affordable housing for a significant number of households in the City.

Describe the need for specific types of housing:

Overall, there is a lack of housing diversity among owner-occupied units in the City. As noted above, homeowner units tend to be large, making them less affordable. There are also 571 occupied housing units without complete kitchen facilities and 145 occupied units without complete plumbing facilities. These households are in need of support in order to address this significant deficiency.

Discussion

N/A

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

Introduction

The following section examines the cost of housing for both homeowners and renters within Stamford. A review is made of current home values and rents as well as the recent changes in home values and rents. Finally, a closer look is given to the affordability of the existing housing stock for the residents of the jurisdiction.

Since 2010, the median home value has decreased by 8.4% in the City. During the same time period the median rent has gone up by 22.7%. This creates a situation where homeowners own property with a lower than expected value, but renters are paying rents that continue to rise. Renters, in particular, are harmed by higher housing costs because they do not get a return on their monthly payments through property ownership and rising costs make it difficult to save the funds to become homeowners themselves.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	574,900	526,700	(8%)
Median Contract Rent	1,294	1,588	23%

Table 29 – Cost of Housing

Alternate Data Source Name:
2006-2010 ACS, 2014-2018 ACS
Data Source Comments:

Rent Paid	Number	%
Less than \$500	1,604	10.9%
\$500-999	1,914	11.7%
\$1,000-1,499	4,670	32.2%
\$1,500-1,999	6,108	23.2%
\$2,000 or more	8,451	22.0%
Total	22,747	100.0%

Table 30 - Rent Paid

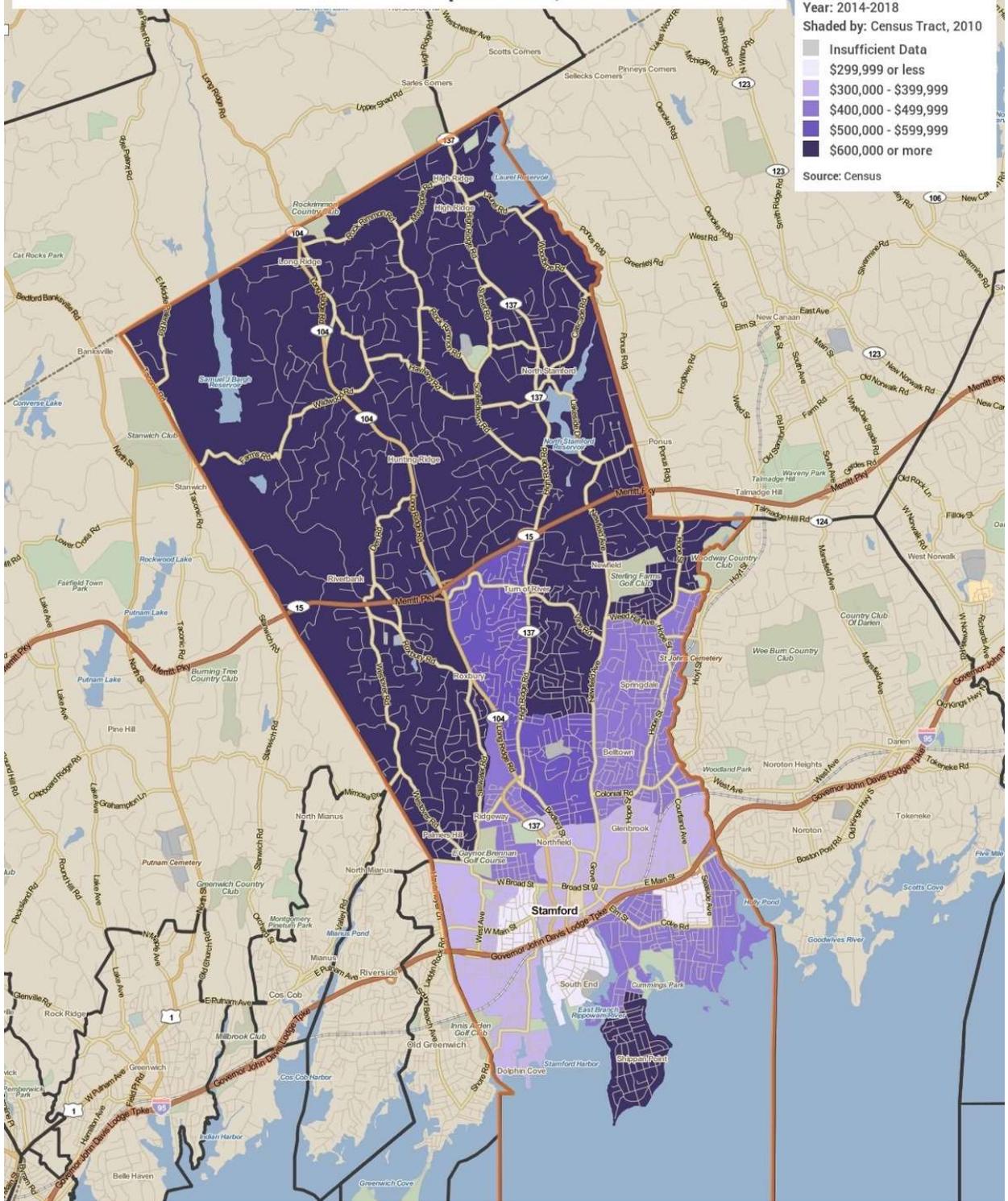
Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

The largest price cohort for rental properties in Stamford is the \$2,000 or more range with 37.2% of all properties. There are very few renters who pay less than \$1,000 in rent. Later in this section, the report examines rental rates as a percentage of household income to determine the affordability of rental housing.

Home Value

The map below shows the median home value by census tract throughout the jurisdiction. High home values are primarily in the northern part of the City. In these areas the median home value is over \$600,000. Low home value tracts are near I-95 and some tracts have a median value of less than \$300,000.

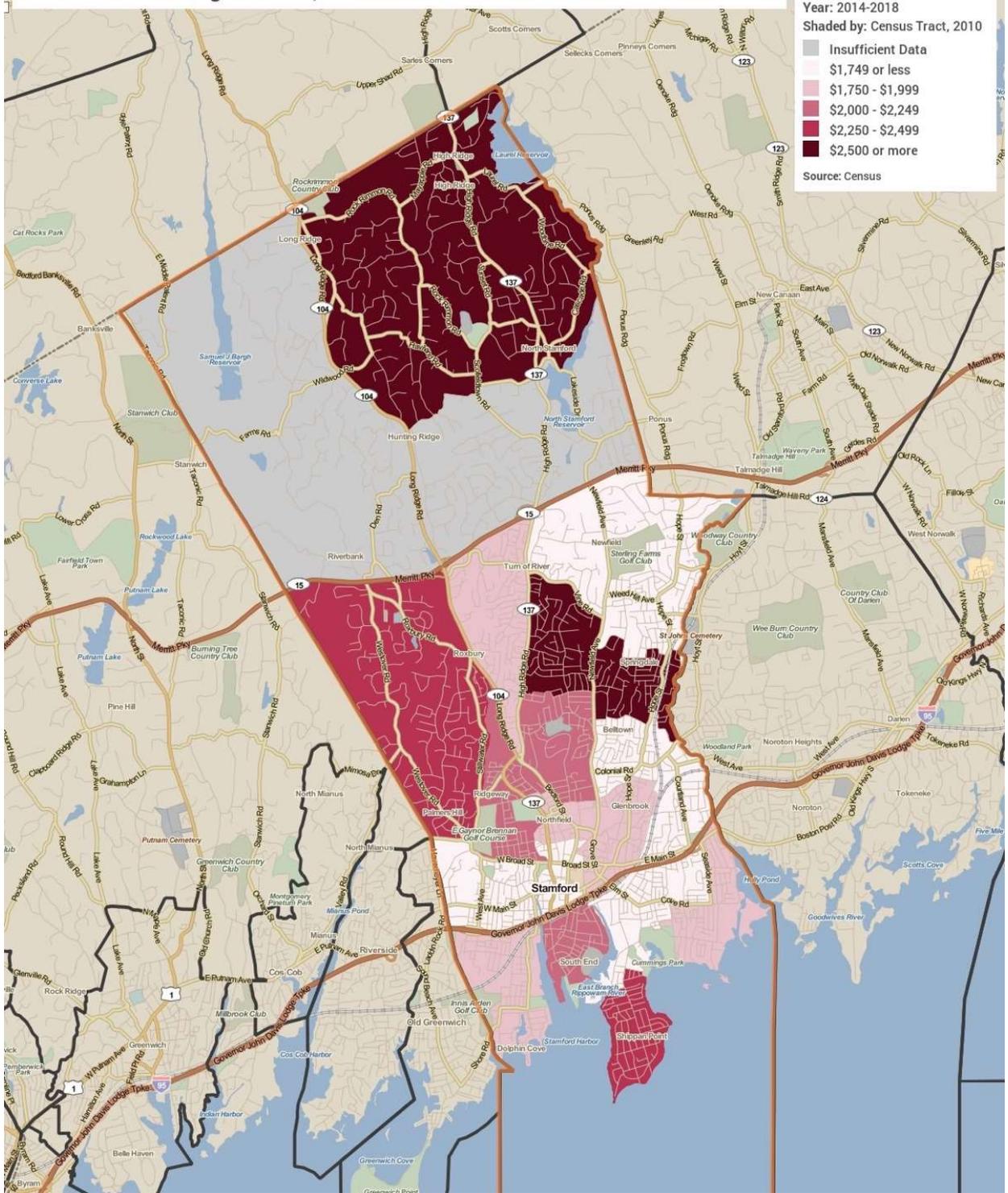
Estimated median value of an owner-occupied home, between 2014-2018.



Median Home Value
Median Rent

The map below displays the median rent by census tract. High rent tracts have a median gross rent of \$2,500 or more while tracts with a relatively low rent have a median rent of less than \$7,500. There is not a strong geographic link between rental costs and location, though high median rent tracts are not located in the central part of the City near I-95.

Estimated median gross rent, between 2014-2018.



Median Gross Rent
 Year: 2014-2018
 Shaded by: Census Tract, 2010

- Insufficient Data
- \$1,749 or less
- \$1,750 - \$1,999
- \$2,000 - \$2,249
- \$2,250 - \$2,499
- \$2,500 or more

Source: Census

Median Rent

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,300	No Data
50% HAMFI	5,480	900
80% HAMFI	10,935	2,160
100% HAMFI	No Data	4,900
Total	18,715	7,960

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Housing Affordability

In general, there are less housing units affordable to households with lower HAMFI. Less than 8,000 rental units and 900 owner units are affordable to households with 50% HAMFI or lower.

Data note: The most recent data for % of units affordable to households by income category was the 2011-2015 CHAS.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,211	1,517	1,885	2,404	2,752
High HOME Rent	1,211	1,405	1,688	1,942	2,148
Low HOME Rent	1,211	1,353	1,623	1,876	2,092

Table 32 – Monthly Rent

Alternate Data Source Name:
HUD 2019 FMR and HOME Rents
Data Source Comments:

HOME Rents Limits and Fair Market Rents (FMR)

Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.

The City of Stamford is located in the Stamford-Norwalk, CT HUD Metro FMR Area, and all information (FMR and HOME Rent Limits) presented here applies to all municipalities of the Stamford-Norwalk, CT HUD Metro FMR Area.

Is there sufficient housing for households at all income levels?

No, according to the data above there is not enough housing at all income levels. There is a need for affordable housing, particularly for very low-income households. According to the housing affordability table, less than 8,000 rental units and 900 owner units are affordable to households with 50% HAMFI or lower. Also, when higher income residents purchase or rent homes that are significantly below what they could afford it reduces the availability of affordability for lower income residents. This is particularly true for renters where access to homes of a variety of sizes is limited.

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

The current rental cost trend of increasing rents is likely to decrease affordability in Stamford. The prices will likely increase and lead to a larger rental population that is cost burdened or otherwise living in substandard conditions. The median sales price in Stamford has remained relatively steady since 2005. If trends continue then the increase in median household income will match or rise faster than housing costs, leading to a similar housing affordability among homeowners.

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

Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

The median contract rent for all units in Stamford was \$1,588 according to 2014-2018 ACS estimates in the above table. This falls between the Fair Market Rent and High HOME Rent for an efficiency and 1-bedroom unit. For Low HOME Rent, High HOME Rent, and FMR the median rent falls between 2-bedroom and 3-bedroom units. Understanding the relationship between FMR, HOME Rents, and the median rent can help guide the City in providing grant funds and other resources to the organizations and programs that will have the greatest impact.

Discussion

N/A

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

Introduction

The tables and maps below provide details on the condition of housing units throughout the city of Stamford by looking at factors such as age, vacancy, and the prevalence of housing problems.

HUD describes four housing conditions as being problematic: 1) the home lacks complete or adequate kitchen facilities, 2) the home lacks complete or adequate plumbing facilities, 3) the home is overcrowded - defined as more than one person per room, 4) the household is cost burdened by paying more than 30% of their income towards housing costs.

Definitions

Per Stamford Regulation Section 146-14 the City of Stamford has adopted the State of Connecticut Building Codes. The 2018 Connecticut State Building Code adopts the 2015 International Building Code as one of its model codes and HUD standards for its definition for "substandard condition" and "substandard condition but suitable for rehabilitation."

According to 24 Code of Federal Regulations (CFR):

§ 5.425 Federal preference: Substandard housing. (a) When unit is substandard. (See §5.415(a)(2) and (c)(2)(ii) for applicability of this section to the Section 8 Certificate/Voucher, Project-Based Certificate, Moderate Rehabilitation programs and the public housing program.) A unit is substandard if it: (1) Is dilapidated; (2) Does not have operable indoor plumbing; (3) Does not have a usable flush toilet inside the unit for the exclusive use of a family; (4) Does not have a usable bathtub or shower inside the unit for the exclusive use of a family; (5) Does not have electricity, or has inadequate or unsafe electrical service; (6) Does not have a safe or adequate source of heat; (7) Should, but does not, have a kitchen; or (8) Has been declared unfit for habitation by an agency or unit of government. (b) Other definitions—(1) Dilapidated unit. A housing unit is dilapidated if: (i) The unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or (ii) The unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair or from serious damage to the structure.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	8,988	34%	10,949	47%
With two selected Conditions	151	1%	1,385	6%
With three selected Conditions	8	0%	0	0%
With four selected Conditions	0	0%	0	0%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
No selected Conditions	17,084	65%	10,945	47%
Total	26,231	100%	23,279	100%

Table 33 - Condition of Units

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

The table above details the number of owner and renter households that have at least one housing condition. Renters are much more likely to experience housing problems than homeowners. Nearly half of all renters have at least one housing problem while only 34% of homeowners report a condition. Relatively few households have multiple housing problems and due to the analysis conducted throughout this document it is safe to say that the housing problem faced by most is cost burden.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,879	7%	5,306	23%
1980-1999	4,667	18%	5,774	25%
1950-1979	13,078	50%	8,591	37%
Before 1950	6,607	25%	3,608	15%
Total	26,231	100%	23,279	100%

Table 34 – Year Unit Built

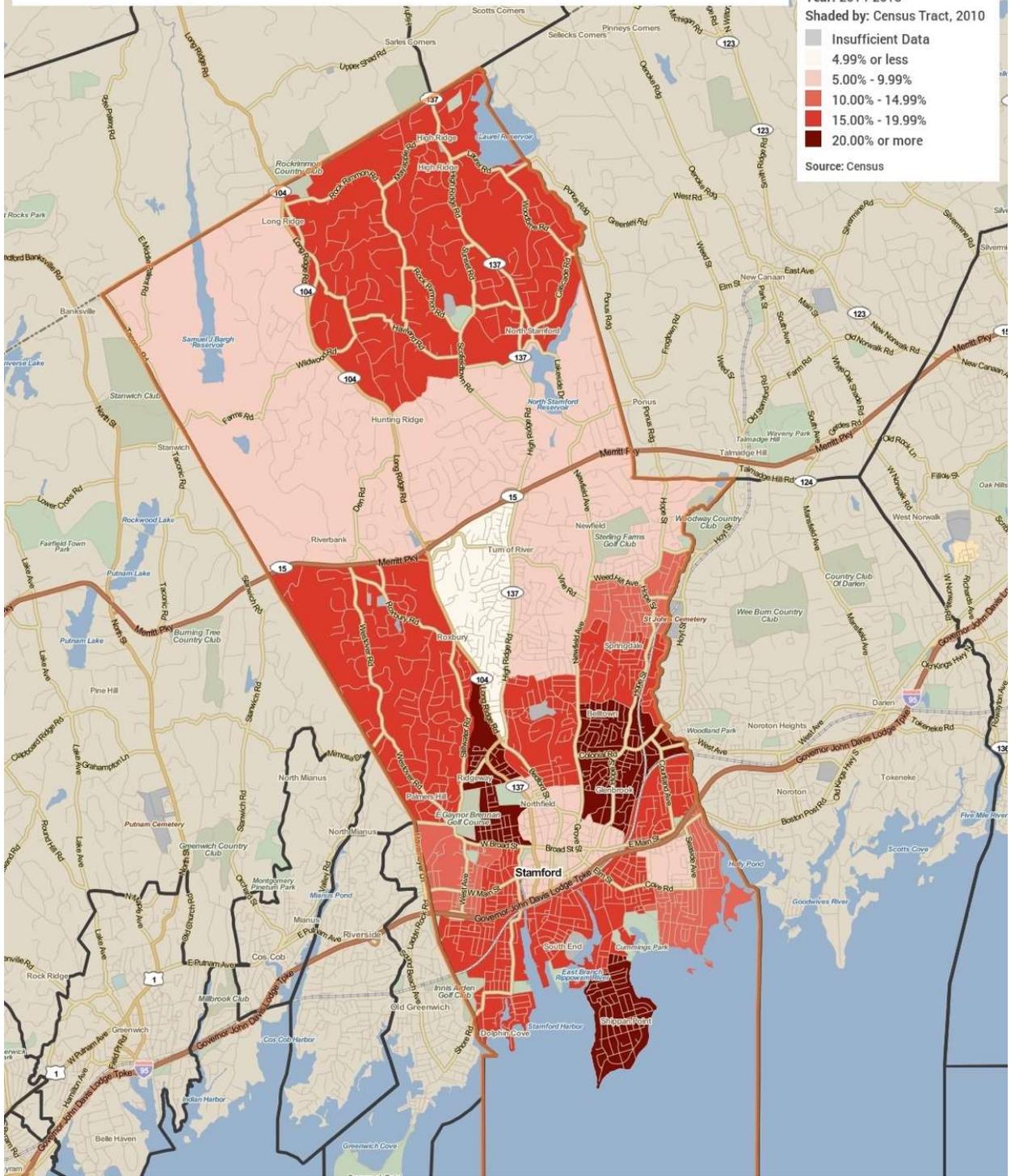
Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

In Stamford, there is a significant number of units built prior to 1980. Due to the use of lead-based paint prior to 1978, in this analysis any units built prior to 1980 will potentially have a lead-based paint hazard. Approximately 75% of owner-occupied units and 52% of renter-occupied units may have a lead-based paint hazard. This amounts to approximately 31,884 households at risk of lead-based paint.

Age of Housing

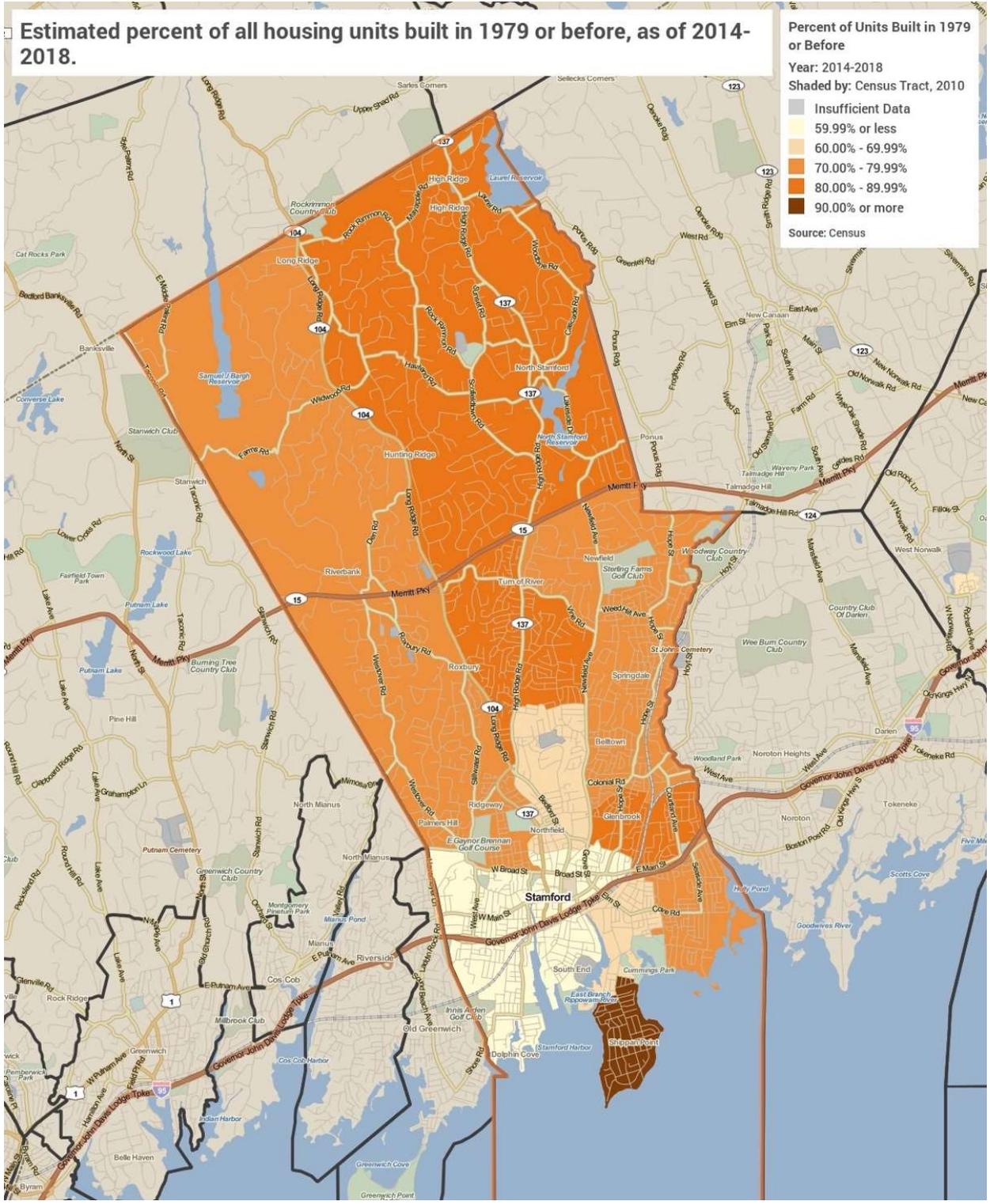
The maps below depict the prevalence of older housing units in the City. Housing units built prior to 1940 are primarily found in the southern part of the City. In many of these tracts over 15% of the units were built during that time. The highest concentration of homes built prior to 1940 is found in three tracts where over 20% of the units fall in this age group.

Estimated percent of all housing units built in 1939 or before, as of 2014-2018.



Housing Units Built before 1940
Housing Units Built Before 1980

For units built prior to 1980, the concentrated areas with homes built prior to 1980 spread out from the southwest corner of the City. Shippan Point has the highest concentration with over 90% of the housing units built prior to 1980. The lowest concentration is in the southwest corner where less than 60% of the units were built prior to 1980.



Housing Units Built Before 1980

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	19,685	75%	12,199	52%
Housing Units build before 1980 with children present	2,870	11%	1,040	4%

Table 35 – Risk of Lead-Based Paint

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

Lead-Based Paint Hazard

As mentioned previously, any housing unit built prior to 1980 may contain lead-based paint in portions of the home. The most common locations are window and door frames, walls, and ceilings, and in some cases throughout the entire home. Thus, it is generally accepted that these homes at least have a risk of lead-based paint hazards and should be tested in accordance with HUD standards.

In the City of Stamford, homeowners with children under 6 are more likely to live in a home with a lead-based paint hazard than renters with young children. Overall, approximately 75% of owners and 49% of renters live in a home built before 1980. About 11% of homeowners with children live in older units, which more than twice that of renters with 4%.

Data note: The most recent data for % of units affordable to households by income category was the 2011-2015 CHAS.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

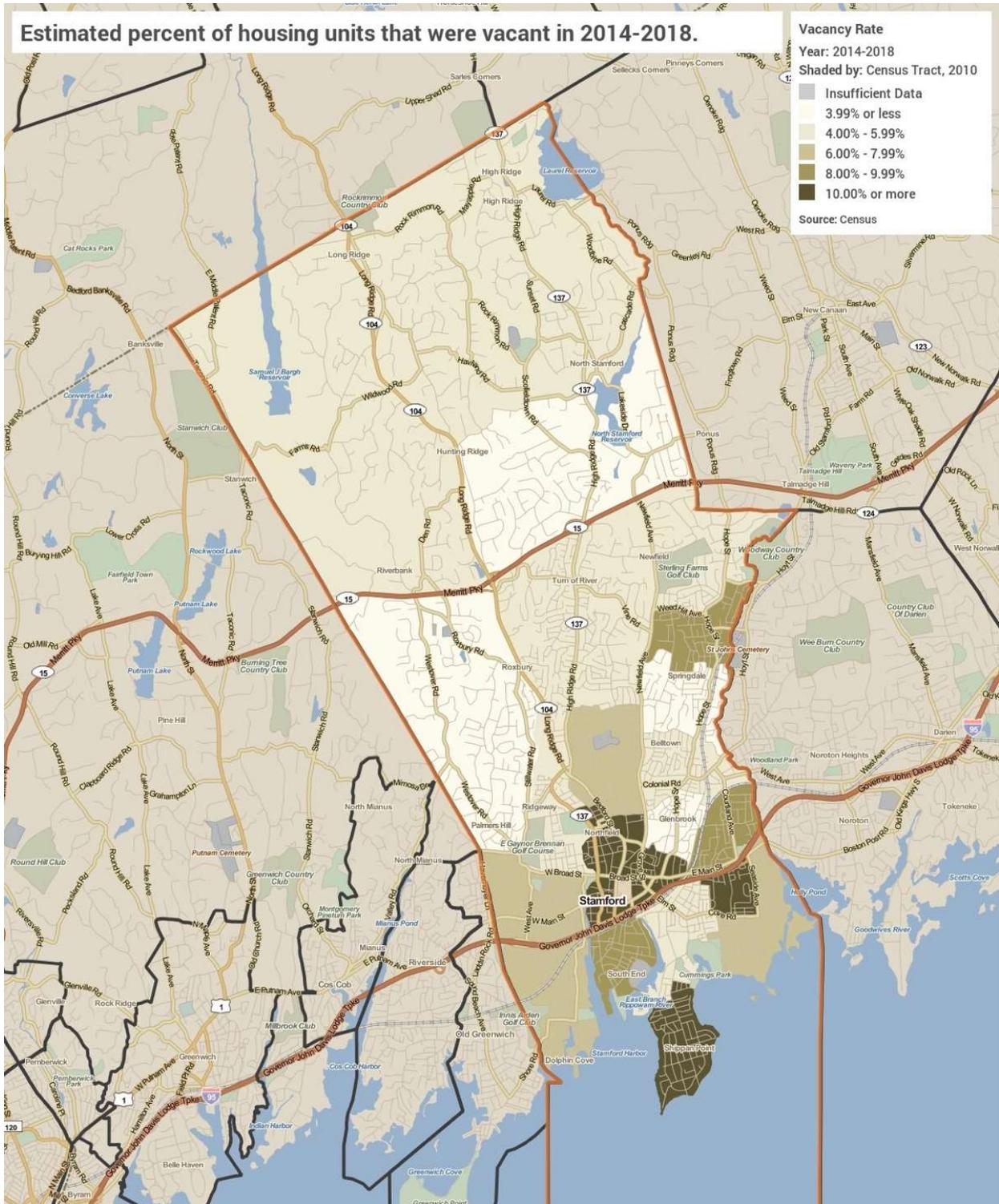
Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Vacant Housing

The vacancy rate is the rate of homes that are currently unoccupied in a community. It is normal for a community to have vacant units and the general rule is that 7% of rental units and 2% of owner-occupied units is considered healthy. When there are not enough vacant units it becomes difficult for new residents to move into the community and for current residents to change housing as their needs change.

The map below shows the average housing vacancy rates throughout the City. The darker shaded areas have higher vacancy rates, while the lighter shaded areas have lower vacancy rates. Most census tracts in the City have a vacancy rate less than 6%, however there are a few tracts to the south with a noticeable higher rate of 10% or more.



Housing Vacancy

Need for Owner and Rental Rehabilitation

The housing stock of Stamford is relatively old and may be in great need of rehabilitation, in particular for low- to moderate income homeowners. The cold winters in the area can increase the need for support for rehabilitation, particularly for low-income residents who may lack the resources to repair their home themselves. The high cost burden rate in the City means that many households will not have savings to put towards home repairs.

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

According to the 2012-2016 CHAS data, there are over 24,000 LMI households in Stamford. These households likely need support in order to address any rehabilitation or lead-based paint remediation.

The City of Stamford has a great need for housing rehabilitation. The housing stock in the City is relatively old and as these homes age there is an increasing need for rehabilitation to maintain safe and secure units. It is particularly important to assist low-income households that live in older homes. Due to financial restraints they may need support to prevent homes from deteriorating and falling into disrepair.

Discussion

N/A

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

Introduction

The City is served by Charter Oak Communities, the local PHA operating in Stamford. The number of units data provided below is from the PIC/PIH Information Center informed by the PHA operating in the City.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	54	503	1,408	32	1,376	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

Seven sites received HUD PHA Inspection scores as of 2018. Five of the developments received excellent scores of over 90 while two sites had an above average score over 80.

Note:

Public Housing Condition

Public Housing Development	Average Inspection Score
GREENFIELD	100
TAYLOR STREET	97
FAIRGATE	96
PALMER SQUARE	95
URSULA PARK TOWNHOUSES	92
POST HOUSE	87
STAMFORD MANOR	80

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

HUD provides physical inspection scores for PHA developments across the country. The physical condition scoring process is based on three elements within the property, which are:

1. Inspectable areas: site, building exterior, building system, common areas and dwelling units;
2. Inspectable items: walls, kitchens, bathrooms and other things to be inspected in the inspectable area; and
3. Observed deficiencies.

A score of 55 or below means that the property is in poor condition, and properties in excellent condition have a score of 90 and over. Currently, none of the properties managed by the housing authority have a score that qualifies them a poor condition.

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

The PHA has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District 9 West Side/Census Tracts 214 and 215).

The PHA will continue to address the need for tenants to increase income through education, counseling and job training. As well, the PHA will continue its efforts to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development.

Discussion:

N/A

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

Introduction

Stamford offers various services for a diverse homeless population that includes families with children, elderly and the disabled. Resources such as food banks and health clinics are available. Many shelters also provide services such as alcohol and drug rehab treatment along with clinics. The following data covers the entire CT-503 Bridgeport, Stamford, Norwalk/Fairfield County Continuum of Care and not just the City of Stamford. City-level data was not available.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	57	0	63	4	0
Households with Only Adults	92	0	3	151	0
Chronically Homeless Households	0	0	0	1,986	0
Veterans	0	0	52	119	0
Unaccompanied Youth	12	0	15	20	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: CT 2019 PIT Count Stamford-Greenwich Summary. There was no data provided for beds for chronically homeless households, veterans and unaccompanied youth.

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

Homeless shelters routinely work to assure that their clients are signed up for income support programs (U.S. Social Security and SSDI and medical (Medicare, State Husky). State HUSKY, for example, qualifies clients for services including:

- Preventive Care
- Doctor Visits
- Women’s Health Care
- Family Planning Services
- Maternity Care
- Hospital Stays
- Physical Therapy/Occupational Therapy/Speech Therapy
- Audiology Services
- Physical Rehabilitation
- Dialysis
- Durable Medical Equipment
- Hearing Aids
- Orthotic and Prosthetic Devices
- Home Health Care
- Hospice Services
- Ambulatory Surgery
- Hospital Outpatient Care
- Laboratory Tests
- X-rays and other Radiology Services
- Vision Care
- Emergency Care
- Dental Services (through CT Dental Health Partnership)
- Behavioral Health Services (through CT Behavioral Health Partnership)
- Pharmacy (medications)

The shelters work with WorkPlace, an agency that does workforce development for employers in the region. It also supplies a special Support Services for Veteran Families (SSVF). The New Haven Shelter is a partner in this program, providing office space for SSVF staff.

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

The following services are listed in the 2019 PIT Count for the CT-503 Bridgeport, Stamford, Norwalk/Fairfield County Continuum of Care and not just the City of Stamford.

Emergency Shelter

1st Congregational Church, 20 seasonal beds

Alpha Community Services YMCA (2 facilities), 110 family beds

Bridgeport Rescue Mission (3 facilities), 48 total adult and family beds

Domestic Violence Crisis Center (2 facilities), 30 family beds

Dorothy Day Hospitality, 16 adult only beds

Family and Children's Aid, 16 family beds

Good Samaritan Mission, 14 adult beds

Homes with Hope (3 facilities), 43 total adult and family beds

Inspirica Inc (3 facilities), 67 total adult and family beds

Kids in Crisis, 12 child beds

Open Door Shelter, 99 total adult and family beds

Pacific House, 67 adult beds

RNP, 34 adult beds

Supportive Housing Works, 16 seasonal beds

The Center for Family Justice, 20 total adult and family beds

Women's Center DV Shelter, 13 adult beds

Transitional Housing

ABRI Homes for the Brave (5 facilities), 52 total adult beds

Amos House, 13 adult beds

CASA, 10 adult beds

GBAPP, 7 adult beds

Inspirica (2 facilities), 63 total adult and family beds

Malta House, 12 total adult and family beds

RNP (2 facilities), 13 adult beds

The Center for Family Justice, 12 family beds

Permanent Supportive Housing

ABRI (2 facilities), 14 adult beds

Alpha YMCA, (6 facilities), 394 total adult and family beds

ARC, 6 beds

Bridgeport Housing First (2 facilities), 201 total adult and family beds

Catholic Charities of Fairfield County (5 facilities), 176 total adult and family beds

Center for Human Dev (2 facilities), 26 adult beds

Continuum of Care, 20 adult beds

Danbury Housing Authority, 10 adult beds

DMHAS (3 facilities), 77 adult beds

Emerge (2 facilities), 14 family beds

Family and Children's Agency (7 facilities), 52 total adult and family beds

Homes with Hope (6 facilities), 61 total adult and family beds

Inspirica (4 facilities), 34 total adult and family beds

Laurel House (5 facilities), 38 total adult and family beds

Liberation Programs, 17 family beds

Mid-Fairfield AIDS Project (3 facilities), 38 total adult and family beds

Norwalk Housing Authority, 14 total adult and family beds

Open Door Shelter (7 facilities), 63 total adult and family beds

Operation Hope (6 facilities), 92 total adult and family beds

Pacific House (8 facilities), 55 total adult and family beds

RNP, 16 adult beds

South Western CT (8 facilities), 397 total adult and family beds

St. Vincent's CRS (3 facilities), 45 adult beds

The Connection (2 facilities), 37 total adult and family beds

Veterans Administration VA-VASH (3 facilities), 86 total adult and family beds

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

Introduction

There are four primary groups with non-homeless special needs in the jurisdiction. They are the elderly and frail elderly, those with HIV/AIDS and their families, those with alcohol and/or drug addiction, and the mentally or physically disabled. This section will explain who they are, what their needs are, and how the jurisdiction is accommodating (or should accommodate) those needs.

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

Elderly: The supportive housing needs for this population can vary widely depending on the health and fitness of the individuals. In general, with aging disabilities and other health issues become more common. Because of this, supportive housing must include access to health professionals and housing modifications to assist the resident. It is important to help residents stay independent and in their own homes for as long as possible if they prefer that.

HIV/AIDS: Medical and social support is important for residents living with HIV/AIDS. While there have been great advances in the medical treatment of HIV/AIDS, it is still important to provide specialized support. Family and friends must be accessible and medical facilities should be nearby.

Alcohol and/or Drug Addiction: Individuals dealing with addiction often require housing options that will provide a safe, sober place for recovery. A strong network is necessary to maximize the chance they will stay healthy and sober. It is important that these persons have access to health services, support groups, employment assistance, and access to family and friends. Additionally, detoxification facilities are necessary when addiction is first recognized.

Mental and Physical Disabilities: Individuals with disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their situation. Often times, individuals with disabilities have a fixed income and limited housing options. Individuals with more independent skills can utilize subsidized housing but individuals that need more support or specialized housing have fewer options. Many individuals continue to reside with parents and families throughout adulthood, which can put additional financial burden on the family. Regardless of the housing situation, a common thread is the need to continuous support services dependent on the level of capabilities.

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

The Connecticut State Agency Department of Mental Health and Addiction Services has an agreement with Inspirica, to provide 3 units for individuals who are somehow working their way through and/or out of the criminal justice system, and who have mental health issues. Inspirica provides supportive services to those referred for these units.

Inspirica and the Shelter for the Homeless operate supportive housing. They refer clients to. Optimus (healthcare services), Dubois (mental health), Liberation Programs (substance abuse), CT Renaissance (substance abuse), Kids in Crisis (unaccompanied youth) and the Child Guidance Center (psychological.)

They also provide workforce/job readiness training and refer clients for in-depth training to The Workplace. This is done to assure that a client of supportive housing can increase control of his/her life and contribute to their housing needs.

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

To address the housing and supportive service needs of persons who are not yet homeless, but have other special needs, the City has made it a goal to serve this population in the Strategic Plan. The goal is:

3A Provide Supportive Services for Special Needs

The special needs community in the City has been identified as those who are elderly, persons with a disability, persons with alcohol or drug addiction, persons who are victims of domestic violence, persons at risk of becoming homeless. Supportive services help to improve the quality of life for the special needs population and work to keep them from being homeless.

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

See above

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City's latest update to its Impediments to Fair Housing Analysis and Plan indicated the following actions should be taken to overcome impediments:

- Increase home ownership opportunities for low-moderate income buyers;
- Improve quality and number of affordable rental units to provide choice for low-moderate income renters;
- Improve access to housing opportunities for low-moderate income people.

Barriers cited above included the funds needed to create and subsidize deeply affordable rental housing, and income/rent limits used by federal programs in a high cost housing area. Access to credit for families/individuals disproportionately affected by housing problems needs to be addressed as well.

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

Introduction

This section provides insight into the economic development landscape of Stamford. The table below details the extent of business sector employment throughout the City. Unemployment, commuting times, and education are also analyzed in this section.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	186	2	0	0	0
Arts, Entertainment, Accommodations	7,163	9,246	10	14	4
Construction	5,140	256	7	0	-7
Education and Health Care Services	14,813	7,443	20	11	-9
Finance, Insurance, and Real Estate	9,585	14,755	13	22	9
Information	2,164	1,360	3	2	-1
Manufacturing	3,673	1,999	5	3	-2
Other Services	3,666	4,374	5	7	2
Professional, Scientific, Management Services	14,528	14,228	20	22	2
Public Administration	1,507	2,041	2	3	1
Retail Trade	6,614	2,494	9	4	-5
Transportation and Warehousing	2,307	5,345	3	8	5
Wholesale Trade	1,128	2,138	2	3	1
Total	72,474	65,681	--	--	--

Table 40 - Business Activity

Alternate Data Source Name:

2013-2017 ACS (Workers), 2017 LEHD (Jobs)

Data Source Comments: The most recent data for jobs was the 2017 LEHD, therefore the 2013-2017 ACS was used for comparison.

Share of Workers

In the City of Stamford, there are approximately 6,800 more workers than there are jobs. These residents will need to look for work outside of the City. The largest disconnect is in the Education and Health Services sector and Construction sector. In Education and Health Services there are 7,370 more workers than jobs while in the Construction sector there are 5,170 more workers than jobs.

Labor Force

Total Population in the Civilian Labor Force	77,170
Civilian Employed Population 16 years and over	71,940
Unemployment Rate	4.00
Unemployment Rate for Ages 16-24	16.90
Unemployment Rate for Ages 25-65	5.60

Table 41 - Labor Force

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates

Data Source Comments: Unemployment Rate data is from the BLS, January 2020, not seasonally adjusted. All other data including unemployment by age is from the ACS.

There are multiple methods of measuring unemployment, each with their own pros and cons. The US Census collects annual unemployment data by census tract, which allows for a geographic comparison of the unemployment rate. However, the data is generally two or more years old. The unemployment data gathered by the Bureau of Labor Statistics is produced monthly but cannot be compared by census tract, only by City.

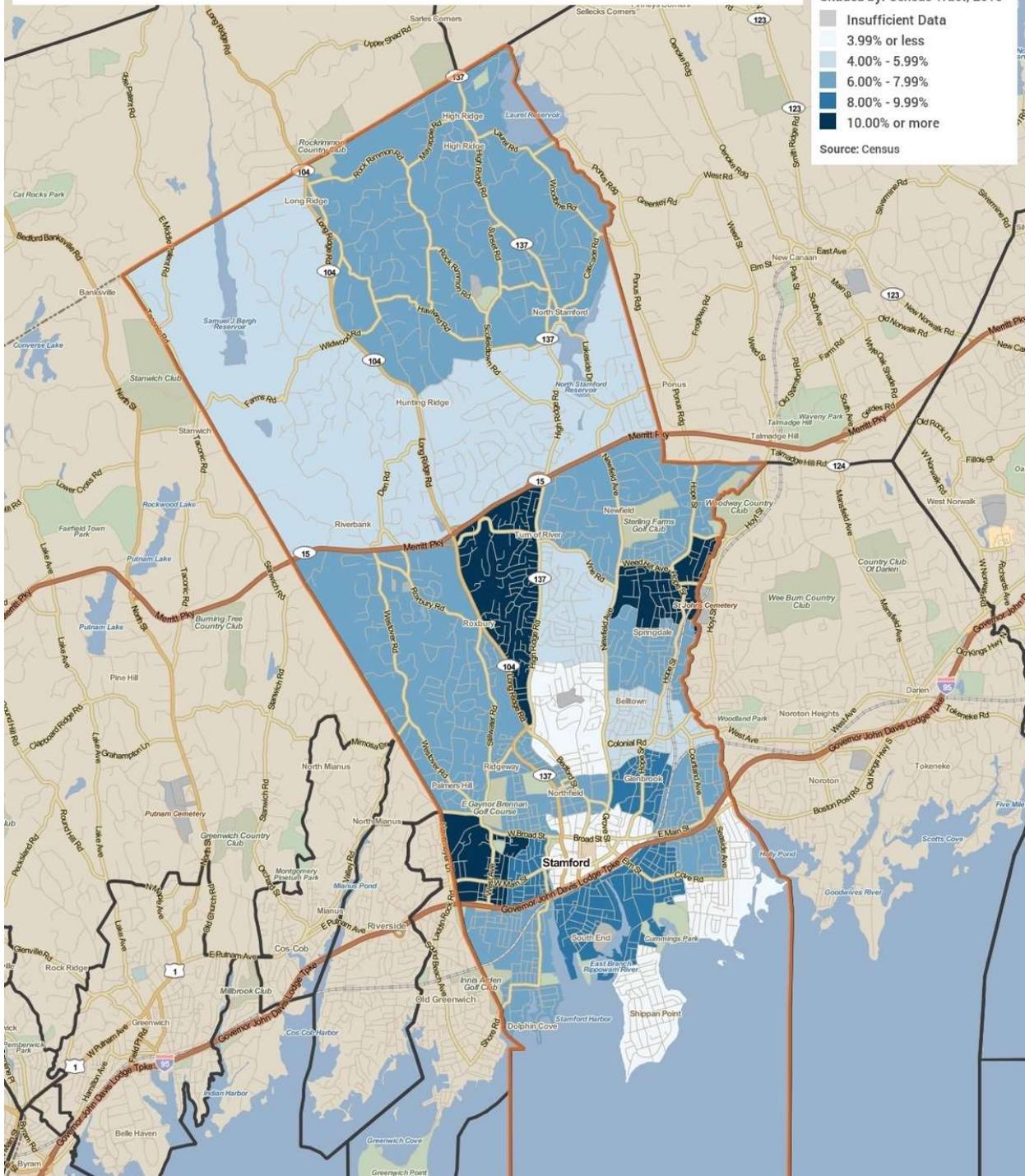
Jan	Feb	March	April	May	June	July	Aug	Sept	Oct
4.2	3.9	3.7	2.8	3.1	3.4	3.4	3.3	3.0	3.0
Nov	Dec								
3.0	2.9								

Table 42 - Unemployment Rate in 2019, BLS

Unemployment Rate

In Stamford, the unemployment rate fluctuated between 2.8 and 4.2 in 2019. This is a relatively low unemployment rate and shows a stable employment sector. When looking at the geographic distribution of unemployment it appears that the unemployment rate varies in the City by census tract. There are several areas of the City where the unemployment rate is 10% or more. These tracts are located near relatively low unemployment tracts where it is less than 4%.

Estimated percent of people age 16 years or older who were unemployed, between 2014-2018.



Unemployment

Occupations by Sector	Number of People
Management, business and financial	33,319

Occupations by Sector	Number of People
Farming, fisheries and forestry occupations	85
Service	14,675
Sales and office	14,616
Construction, extraction, maintenance and repair	4,945
Production, transportation and material moving	4,300

Table 43 – Occupations by Sector

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

Occupations by Sector

The Occupations by Sector table above identifies how prevalent certain jobs are across industries. This differs from the table found earlier in this section that showed how common all jobs were in certain sectors. For example, the managers of both a fast food restaurant and a construction company would both fall under “Management, Business, and Financial” in the above table but would be in different categories in the first table.

In Stamford, the largest occupation sector is the Management, Business, and Financial sector. Over 33,000 jobs in the City fall in this group. The next two largest groups are Service and Sales, with 14,675 and 14,616 jobs, respectively.

Travel Time

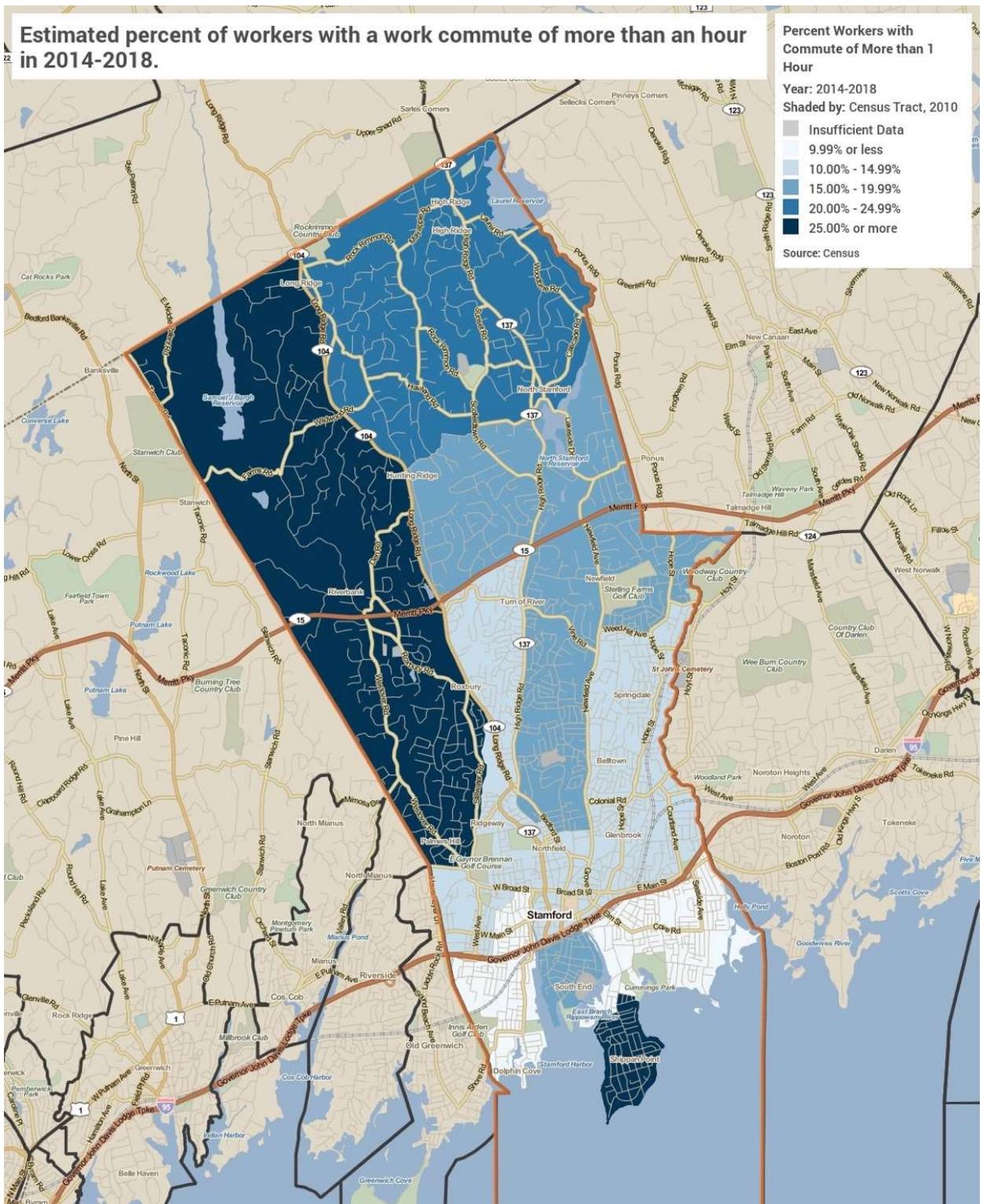
Travel Time	Number	Percentage
< 30 Minutes	43,929	65%
30-59 Minutes	13,947	21%
60 or More Minutes	9,365	14%
Total	67,241	100%

Table 44 - Travel Time

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

Commute

Approximately 65% of all persons commuting to work have a commute of less than 30 minutes each way. By contrast, 14% of all employed persons have a commute of 60 minutes or more, to and from work each day. Residents on the northwestern part of the city and on Shippan Point have a disproportionately long commute. Over 25% of the population commutes more than one hour.



Commute Time More Than One Hour

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,531	450	1,004
High school graduate (includes equivalency)	9,680	1,213	2,680
Some college or Associate's degree	11,275	1,084	2,255
Bachelor's degree or higher	32,384	1,408	4,414

Table 45 - Educational Attainment by Employment Status

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	160	1,191	1,586	1,445	1,639
9th to 12th grade, no diploma	946	633	772	1,295	1,333
High school graduate, GED, or alternative	2,810	2,932	2,913	7,488	5,242
Some college, no degree	3,561	2,886	2,354	5,392	2,045
Associate's degree	250	693	1,446	1,684	950
Bachelor's degree	2,916	8,129	5,059	8,391	3,561
Graduate or professional degree	495	5,192	5,227	7,056	3,775

Table 46 - Educational Attainment by Age

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,955
High school graduate (includes equivalency)	30,319
Some college or Associate's degree	37,580
Bachelor's degree	74,302
Graduate or professional degree	98,411

Table 47 – Median Earnings in the Past 12 Months

Alternate Data Source Name:
2014-2018 ACS 5-Yr Estimates
Data Source Comments:

Median Earnings by Educational Attainment

In general, the median earnings of individuals in the City are closely tied to educational attainment. Median earnings increase as individuals attain higher education. A person with a Bachelor's degree can expect to earn two and half times that of a person with only a high school diploma. There is a similar gap between persons with a graduate or professional degree and someone with an Associate's degree has. A person's potential to earn higher median earnings grows most substantially between an Associate's Degree and a Bachelor's degree.

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

In the City, the Finance, Insurance, and Real Estate sector provides the most jobs. Over 22% of the population is of the jobs in Stamford are in this field. The second largest employment sector is Professional, Scientific, and Management Services making up 21.7% of the jobs. In total, these two sectors employ nearly 29,000 jobs.

Describe the workforce and infrastructure needs of the business community:

As noted in the following question, the workforce and infrastructure needs are of paramount importance to the Stamford region. There is a particular need for greater coordination among key-stakeholders, retaining professionals, and partnerships with educational facilities. The expansion of high-speed internet and a focus on public transportation hubs would also be beneficial. Stamford is competing globally for a workforce and it is important that the city can provide what is preferred by the target workforce.

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

The Western Connecticut Economic Development Plan includes a number of activities that may affect job and business growth opportunities during the planning period. Two of the region's Goals are specifically targeted at job and business development. Additionally, there is one goal that targets infrastructure.

See charts below at the end of the section: Goal 2 - Improved Business Climate, Goal 3 - An Inclusive Workforce, Goal 4 - Improved and Maintained Transportation & Public Infrastructure

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

The population over the age of 18 years is very well educated with almost half holding a Bachelor's degree or higher (48%). As mentioned in the Business Activity table above, in the City of Stamford, there are approximately 6,800 more workers than there are jobs. These residents will need to look for work outside of the City. The largest disconnect is in the Education and Health Services sector and Construction sector. In Education and Health Services there are 7,370 more workers than jobs while in the Construction sector there are 5,170 more workers than jobs.

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

The primary organization conducting workforce initiatives in the City of Stamford is The Workplace. The Workplace runs a number of programs, including:

- Military to Machinist – Helps veterans' transition into a career in manufacturing
- Platform to Employment – A preparatory program that addresses social, emotional, and skill deficiencies associated with long-term unemployment.
- Mortgage Crisis Job Training Program – Helps enhance skills and education to increase earning potential and housing stability
- Supportive Services for Veteran Families – Assists veteran families at risk of becoming homeless
- Career Coach – One-stop shop on wheels and mobile classroom to bring career services and computer training
- American Job Centers – Assists with enhancing job-search efforts and the development of career goals
- Assisted Service Centers – Employment resource for jobseekers with disabilities
- Jobs First Employment Services – Provides education, training services, and case management support to secure employment for recipients of TANF
- Financial Assistance – No-interest loans available to help when searching for a job
- Maturityworks – A training program for residents over the age of 55
- Health Career Academy – Tuition assistance and support to help participants obtain a career in the healthcare field
- Summer Youth Earn and Learn Employment Program – Links young adults and you to summer employment opportunities
- Youthworks – Assists local 16-24-year old choose and prepare for a career
- Center 108 – Opportunities to find the right training for employment in the career path of choice
- Engage Staffing – Assists in job placement

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

Yes

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

The Western Connecticut Economic Development Plan identifies six goals for the region. The actions for these goals include economic initiatives that may be coordinated with the Consolidated Plan. While every action can be assisted by the City of Stamford, the following actions are particularly applicable.

- CEDS 1-1b: Pursue Economic Development District status for the Region
- CEDS 2-1a: Coordinate with business resource providers to create a unified marketing strategy
- CEDS 2-2c: Support incentives for brownfield remediation and redevelopment
- CEDS 4-1a: Support projects to improve the Region's major transportation pines for commuters and freight
- CEDS 4-1d: Prioritize projects near transportation nodes, especially public transit stops
- CEDS 4-2a: Prioritize development projects that reuse previously developed sites, , especially brownfields, and have dense footprints.
- CEDS 5-1c: Prioritize development projects that make use of existing infrastructure
- CEDS 5-1d: Prioritize projects that will remediate and/or reuse brownfield sites
- CEDS 6-2a: Leverage the arts community for projects and programming

Discussion

N/A

Goal 2: Improved Business Climate		
<i>Foster an environment that encourages creativity, innovation and entrepreneurship, and strengthens existing clusters</i>		
Objectives & Actions	Partners	Time Frame
2-1: Improve marketing of business resources	Municipalities, Chambers of Commerce, Small Business Development Center, SBA, etc.	
2-1a: Coordinate with business resource providers to create a unified marketing strategy		S
2-2: Encourage the revitalization of village, town, and growth of city centers	WestCOG, Municipalities, CT Main Street Center, Cultural Alliance of Western CT, CT DEEP	
2-2a: Create a Regional Main Street Program		S
2-2b: Assist in sustaining the local arts community		O
2-2c: Support incentives for brownfield remediation and redevelopment		O
2-3: Engage with stakeholders at the State level to improve the business climate	WestCOG, Municipalities, Other Stakeholders	
2-3a: Coordinate with WestCOG to enhance the business climate		O
2-4: Encourage business support for startups and entrepreneurs	WestCOG, Municipalities, SDBC, Makerspaces & Business Incubators, Libraries, Chambers of Commerce	
2-4a: Create and support shared working spaces, business incubators, and other business support resources in every municipality		S-L
2-4b: Study the demand for incubator space focused on specific clusters and industries		M
2-4c: Work with staff at existing incubators to study the needs of “graduating” incubator firms		L
2-5: Improve customer experience for business owners in every municipality	WestCOG, Municipalities, CERC, CEDAS, CCM	
2-5a: Partner with existing organizations to educate staff and volunteers on municipal boards and commissions		S
2-5b: Conduct a review of municipal zoning and suggest efficiencies		M

Goal 2 - Improved Business Climate

Goal 3: An Inclusive Workforce		
<i>Attract, retain, and develop a multifaceted workforce that meets the needs of existing employers and is attractive to new firms providing high quality careers</i>		
Objectives & Actions	Partners	Time Frame
3-1: Recruit and retain young professionals	Employers, Higher-Ed Institutions, Municipalities, WestCOG, Young Energetic Solutions	
3-1a: Partner with existing organizations to identify and support effective policies and initiatives		O
3-1b: Work with stakeholders to develop a "learn here – live here" initiative		L
3-2: Retain professionals over 50	Workforce Boards, Higher-Ed Institutions, Employers	
3-2a: Identify best practices for workforce retraining and "career ladders" programs		S
3-2b: Work with employers to assess the skills needed for advancement, and if new programs are needed to retrain staff		M
3-2c: Work with employers to identify third-party continuing-education certificates they would accept		M
3-3: Create a diversity of housing that all sectors of the workforce and the regional population can afford	Municipalities, Partnership for Strong Communities, Developers, WestCOG	
3-3a: Partner with existing organizations to identify and support effective policies and initiatives		S
3-3b: Distribute a housing inventory and analysis		M
3-3c: Support local policies that encourage adaptive reuse instead of demolition		O
3-4: Encourage partnerships between Higher-Ed, and trade and technical institutions, and regional industries	Workforce Boards, Higher-Ed Institutions, Business Council of Fairfield County, Employers	
3-4a: Work with educational institutions to develop or expand programs that respond to industry needs		S
3-4b: Work with area companies to list internship opportunities		O
3-5: Support regional cluster focused educational programs at the elementary and high school level	Workforce Boards, Schools, Employers	
3-5a: Work with area colleges and universities to provide local high school students with the opportunity to take college classes		S
3-5b: Support programs that provide children with early exposure to trades and entrepreneurship		O

Goal 3 - An Inclusive Workforce

Goal 4: Improved and Maintained Transportation & Public Infrastructure		
<i>Maintain, improve, and develop the Region's infrastructure so that it meets the needs of the workforce as well as existing and growing industries</i>		
Objectives & Actions	Partners	Time Frame
4-1: Support roadway and public transit improvements that increase connectivity and reduce travel time	Municipalities, HVMPO, SWRMPO, CT DOT, USDOT, CTtransit, Transit Districts, MetroNorth, Amtrak, FRA, Stakeholders	
4-1a: Support projects to improve the Region's major transportation spines for commuters and freight		O
4-1b: Support projects to improve and extend passenger rail service for the New Haven Line and its branches		O
4-1c: Work with bus and shuttle providers to better coordinate and expand services		S
4-1d: Prioritize projects near transportation nodes, especially public transit stops		O
4-1e: Support projects to improve access to nonmotorized transportation		O
4-1f: Coordinate site development projects with transportation improvement plans contained in the Region's Long-Range Transportation Plans		O
4-1g: Investigate opportunities for high-speed rail		O
4-1h: Work with businesses and CT DOT to mitigate the negative impacts of construction on businesses		O
4-1i: Plan for the impacts of technology on transportation		O
4-2: Minimize the amount of new infrastructure that must be developed for economic development projects	Municipalities, WestCOG	
4-2a: Prioritize development projects that reuse previously developed sites, especially brownfields, and have dense footprints		S
4-3: Expand the availability of high-speed broadband coverage and gigabit internet access	Municipalities, Developers, Providers	
4-3a: Support the expansion of public and private internet access		S
4-3b: Create an asset map of municipal resources		S
4-4: Modernize the electric grid	Municipalities, Eversource, Developers	
4-4a: Prioritize projects that incorporate alternative energy and strategies more resilient to harsh weather conditions		S

Goal 4 - Improved and Maintained Transportation & Public Infrastructure

MA-50 Needs and Market Analysis Discussion

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

HUD identifies four specific data points that constitute "housing problems": cost burden, overcrowding, lack of complete plumbing facilities and lack of complete kitchen facilities. In Stamford housing problems are rare except for being cost burdened. According to the 2014-2018 ACS 5-Year Estimates, the citywide rate of each is:

- Cost Burden: 47.5%
- Overcrowding: 4.1%
- Lack of Complete Plumbing Facilities: 0.3%
- Lack of Complete Kitchen Facilities: 1.2%

In order for an area to be concentrated it must include two or more housing problems that are substantially higher than the Citywide average. For this analysis, HUD's definition of "disproportionate" will be used to identify areas substantially higher: 10 percentage points higher than the jurisdiction as a whole. In Stamford that translates to cost burden greater than 57.5%, overcrowding greater than 14.1%, lack of plumbing facilities greater than 10.3%, and lack of kitchen facilities greater than 11.2%.

In Stamford, there are no tracts that have a concentration of multiple housing problems. As noted above, cost burden is a significant problem throughout the City and there are many areas with high cost burden rates. Additionally, there is one tract that had a concentration of overcrowded households. Tract 09001022000 is located south of I-95. Cove Road is the southern border of the tract, seaside avenue is the eastern border, and Dale Street is the western border. In this tract 14.3% of households are overcrowded.

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

For the purposes of this analysis a "racial or ethnic concentration" will be any census tract where a racial or ethnic minority group makes up 10 percent or more of the population than the city as a whole. According to the 2014-2018 American Community Survey 5-Year estimates the racial and ethnic breakdown of Stamford's non-White population is:

- Black, non-Hispanic: 13.55%
- American Indian and Alaska Native, non-Hispanic: 0.34%
- Asian, non-Hispanic: 8.72%
- Native Hawaiian and Other Pacific Islander, non-Hispanic: 0.03%
- Other Race, non-Hispanic: 10.94%
- Two or More Races, non-Hispanic: 2.85%

- Hispanic or Latino: 26.09%

Due to the small sample size, only racial or ethnic groups that make up at least 1.0% of the City's population were analyzed.

Black or African American

A census tract is considered a concentration of Black or African American if 23.55% of the population is part of this racial group. In Stamford, there is a clear racial concentration in the southwest portion of the City.

Other Race

In Stamford, approximately 10.94% of the population identifies as a race other than the ones presented by the U.S. Census. There are three areas, all in the southern portion of the City that report a concentration of this group.

Hispanic

In Stamford, there is a concentration of Hispanic households throughout the southern part of the City. There is a strong overlap between all three racial or ethnic minority groups with a concentration.

Asian and multiracial groups did not present any areas of concentration in Stamford.

A "low-income concentration" is any census tract where the median household income for the tract is 80% or less than the median household income for the City of Stamford. According to the 2014-2018 American Community Survey 5-Year Estimates, the Median Household Income in Stamford is \$89,309. A tract is considered to have a low-income concentration if the MHI is \$71,447 or less. The areas in Stamford with a concentration of low-income households are primarily the same tracts with a concentration of minority residents.

See concentration maps at the end of the section.

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

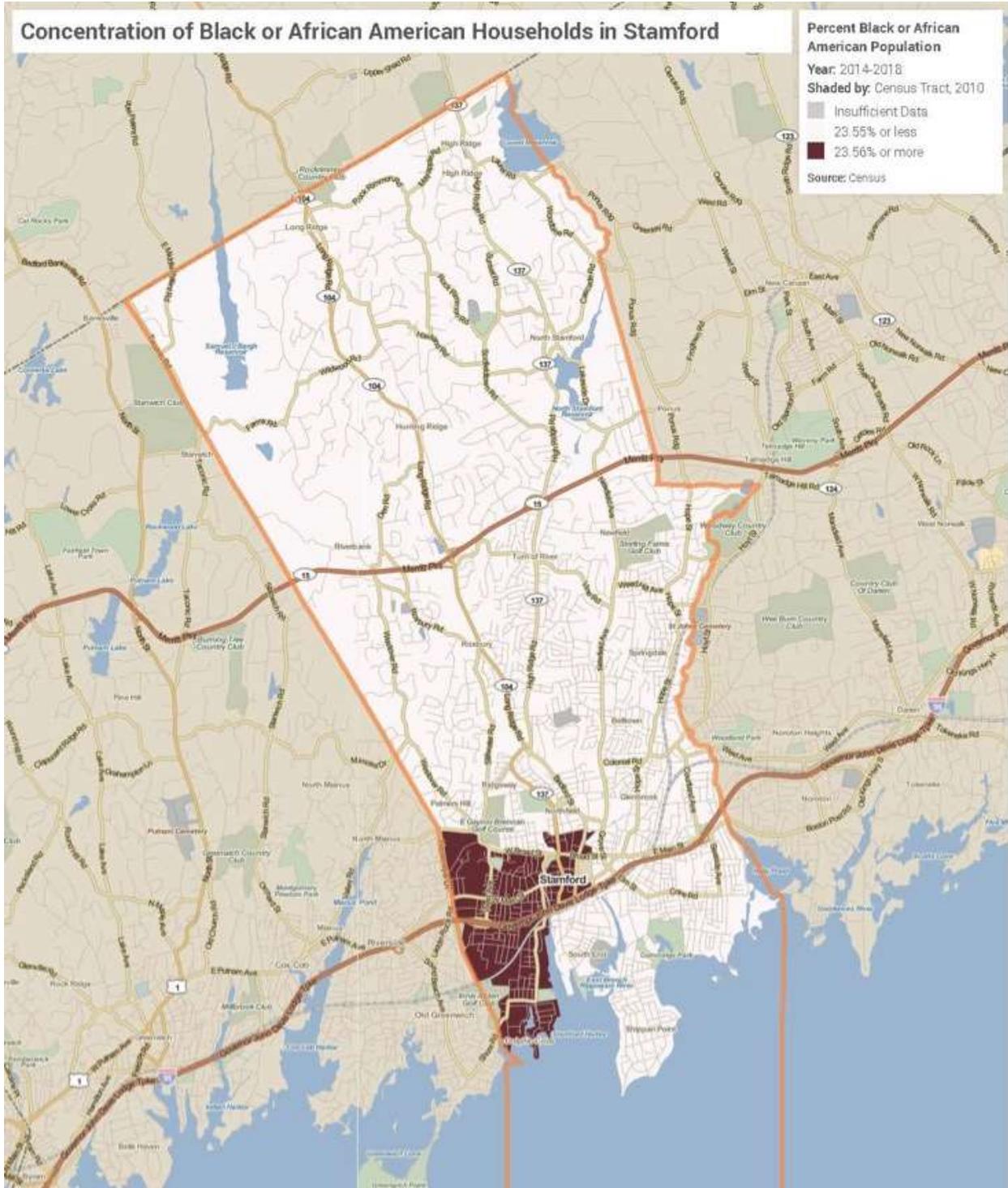
The housing market in the southern tracts with a high concentration of non-White and low-income households is different than the rest of the City, in some ways. The housing stock in this area is much newer in this area and the median rent tends to be lower, as does median home value. However, housing costs are all relative. An area can appear to have low costs when compared to the rest of the area but that does not mean the household can afford the cost.

Are there any community assets in these areas/neighborhoods?

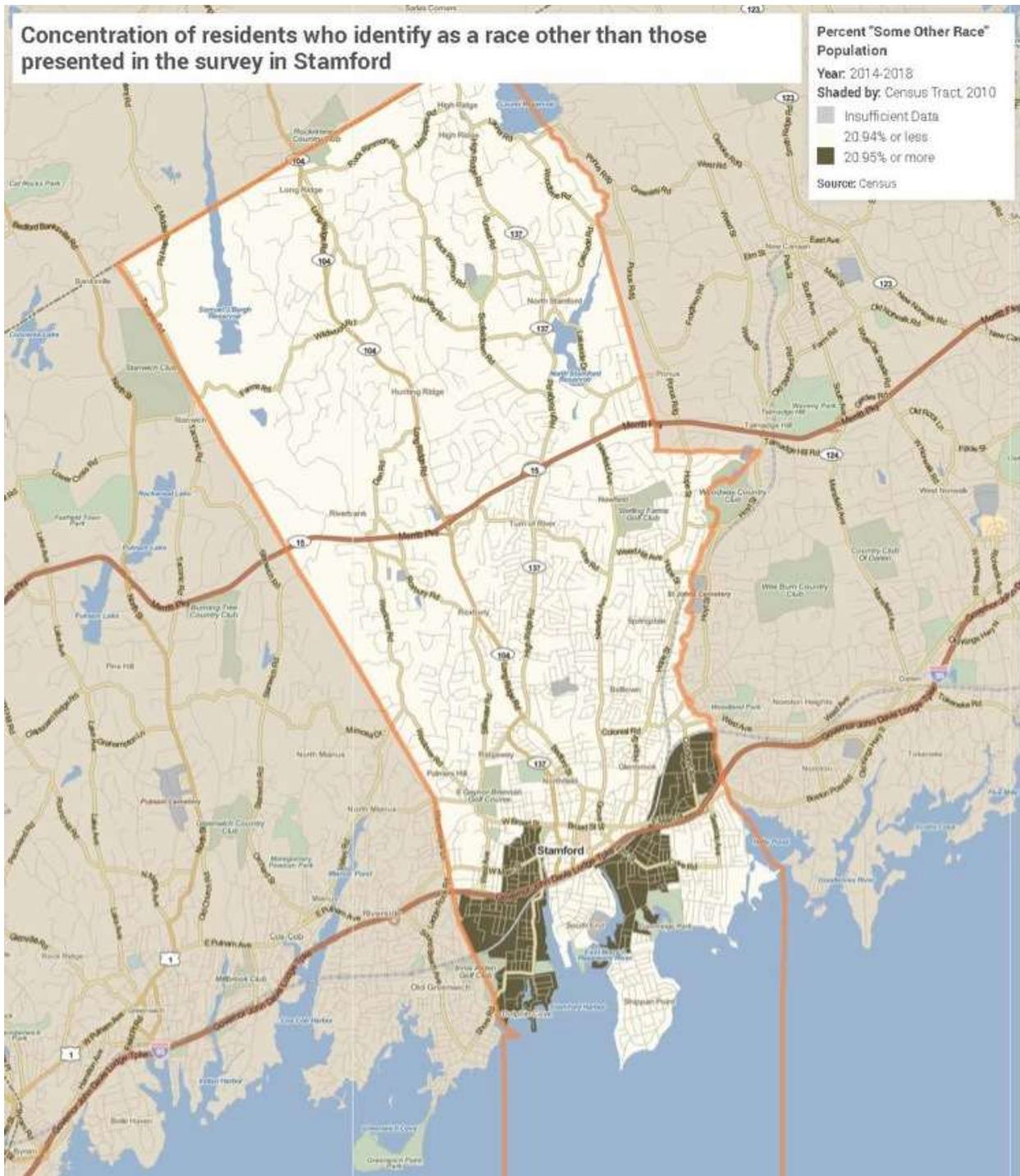
This area is in the economic center of the City of Stamford. There are a number of parks, churches, medical facilities, and businesses in the area. These neighborhoods also have easy access to I-95, the primary transportation route through the city.

Are there other strategic opportunities in any of these areas?

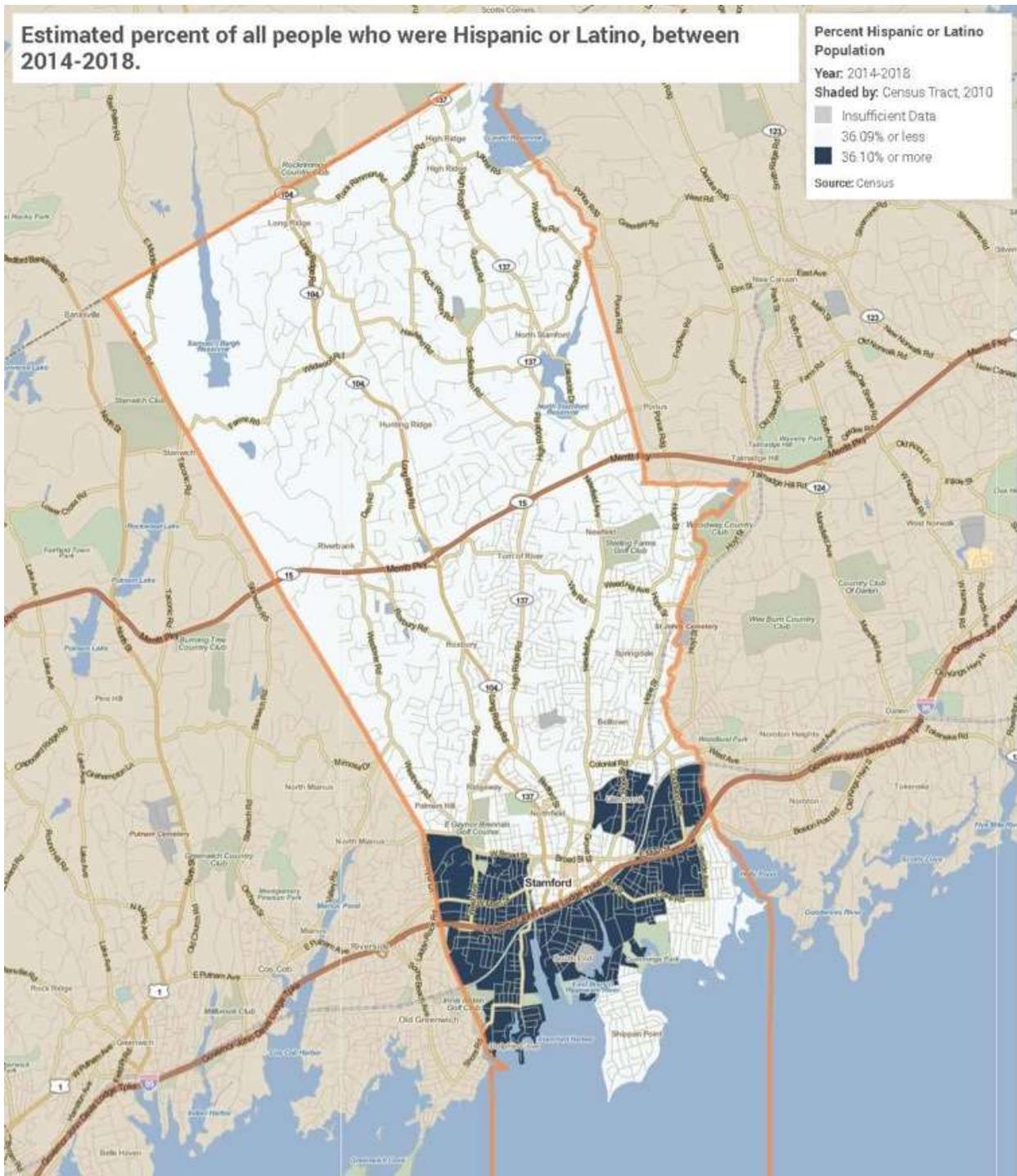
The relatively low prices in this area means that it may be the best option for grant funds. Rehabilitation and construction costs will go further in this area. There is also a number of businesses in the area that could serve as economic opportunities in the community.



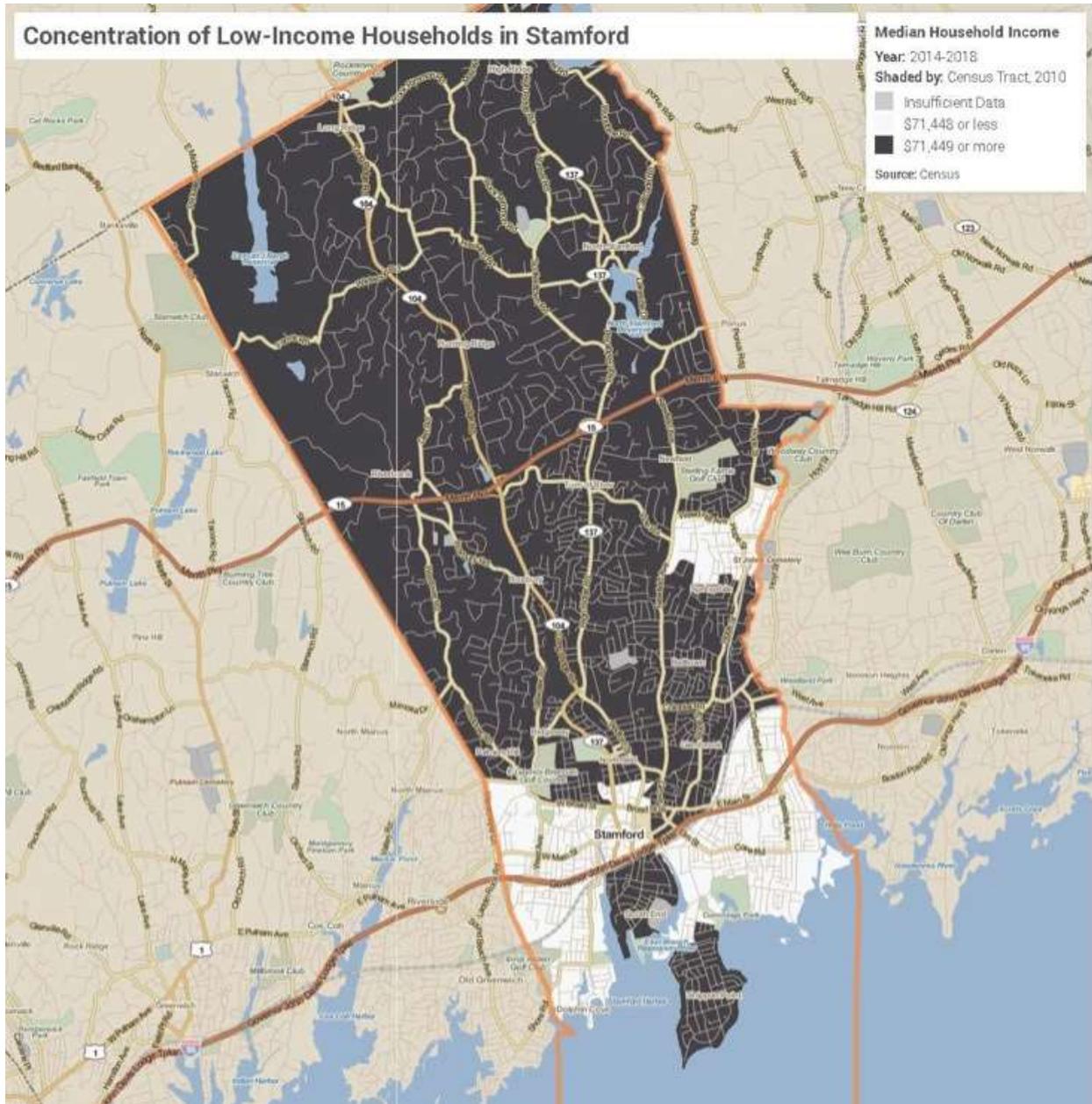
Concentration Black or African American



Concentration Other Race



Concentration Hispanic



Concentration LMI Households

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

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

Internet is an essential communications and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are already often lacking. Studies suggest a strong correlation between increased high-speed internet access and increased education and employment opportunities, especially in small cities and rural areas.

Stamford does not have significant gaps in broadband coverage. Most of the City has multiple options of internet providers, to include LMI areas. The average Stamford household has two (2) options for broadband-quality internet service; however, an estimated 3.5 percent of locals still don't have access to more than one provider and may have to rely on low-grade wireless.

The following map shows broadband access throughout the City. Broadband access is defined as advertised internet speeds of 768 kilobits per second or higher. FCC data shows two major infrastructure options within Stamford: cable and DSL.

See map below at the end of the section: Broadband Access

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

Once broadband access has been obtained, it is important to ensure there is competition among service providers. Any resource that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services. Stamford has a total of five (5) Internet providers offering residential service. Optimum by Altice and Frontier are the strongest providers in Stamford so far as coverage. The average Stamford household has two (2) options for broadband-quality Internet service. These providers frequently overlap around the city:

Frontier (DSL)

Earthlink (DSL)

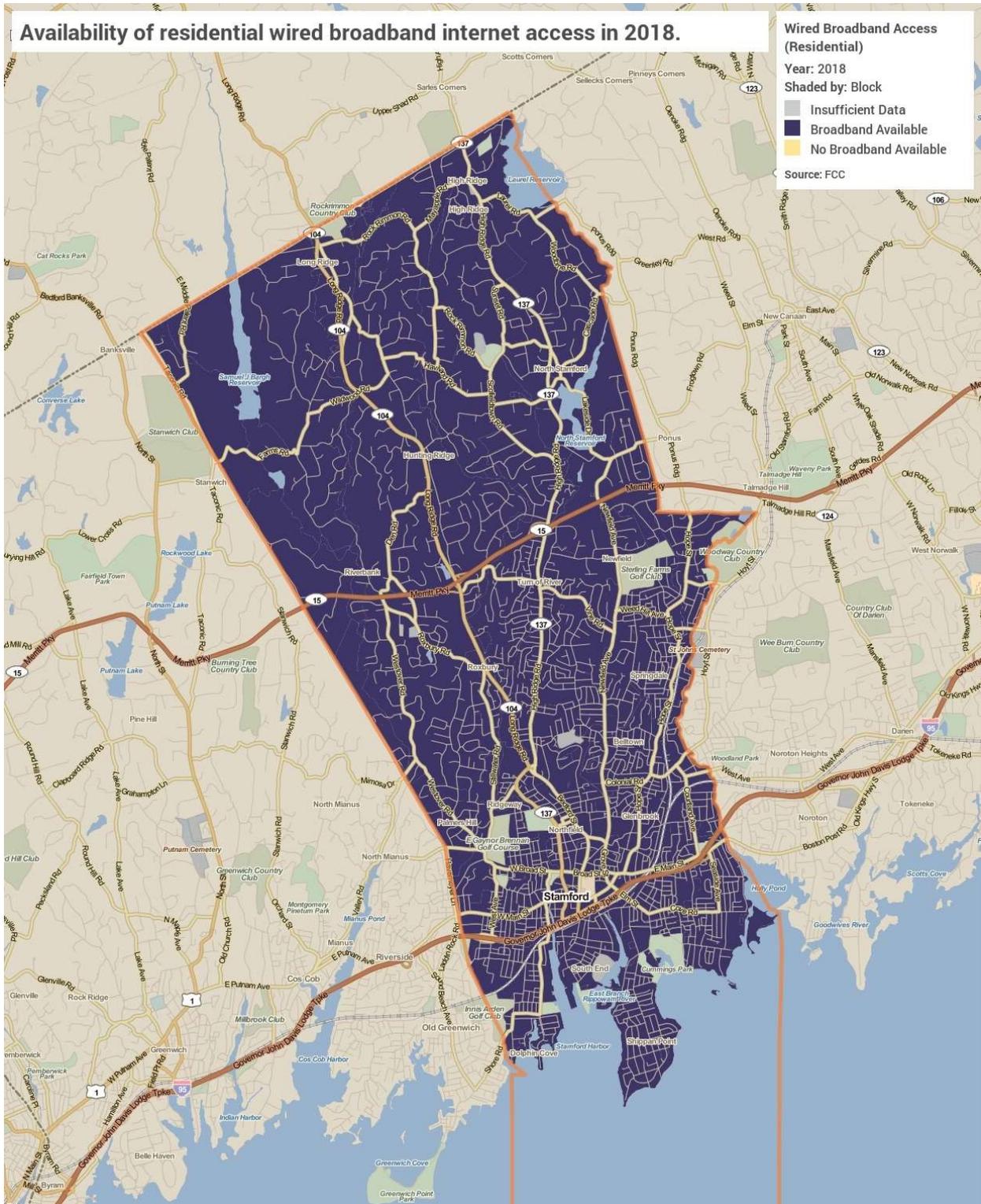
Optimum by Altice (Cable)

Viasat Internet (formerly Exede)(Satellite)

HughesNet (Satellite)

The following map shows the number of broadband service providers by census tract. Most of the City has two (2) options of high-speed internet with competitive providers, though there are some tracts with lower populations that only have access to one provider.

See map at the end of the section: Highspeed Internet Providers



Broadband Access

Number of residential wired internet providers with download speeds above 3 Mbps in 2018.

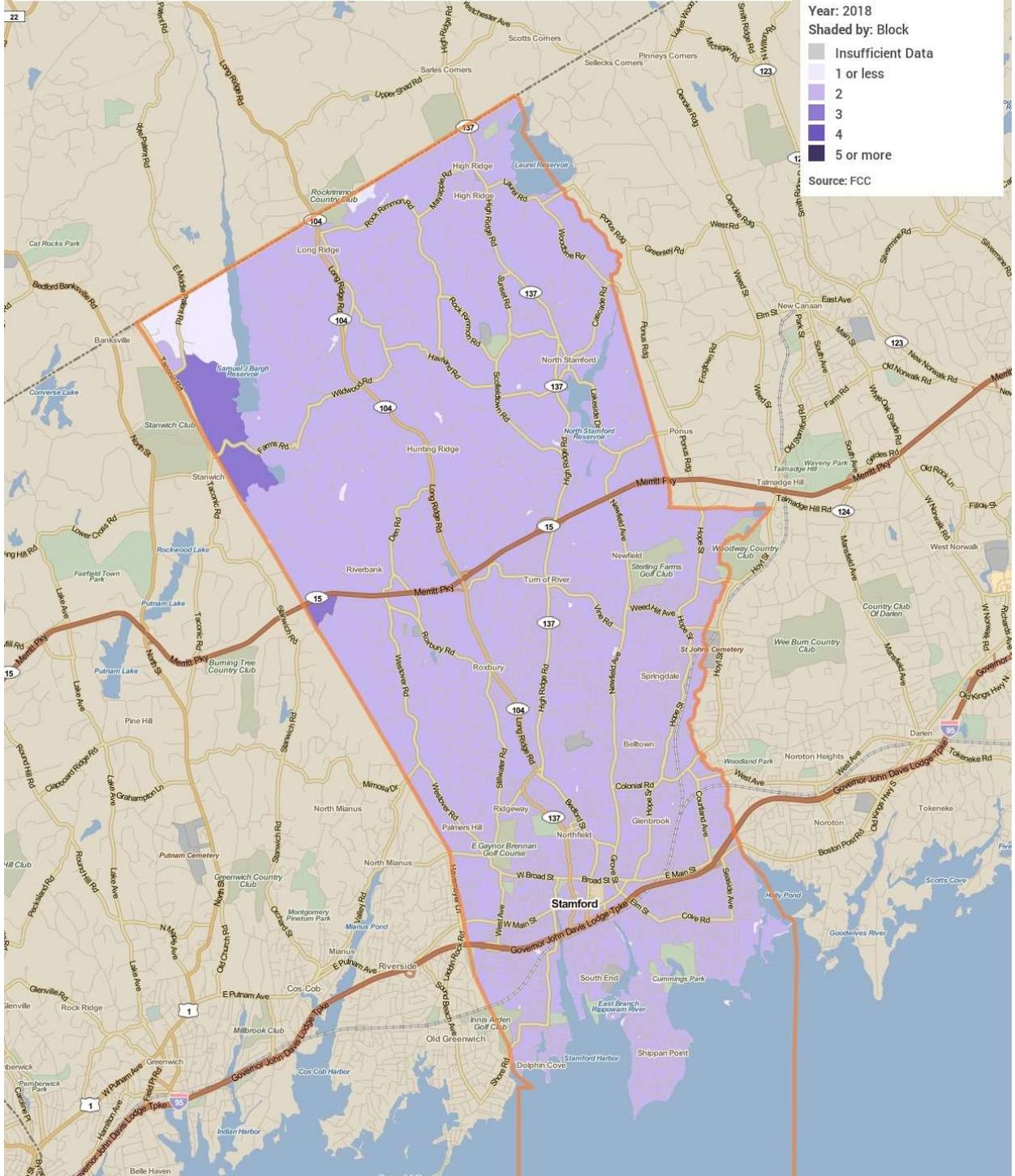
Wired Internet Providers
(Download >3 Mbps;
Residential)

Year: 2018

Shaded by: Block

- Insufficient Data
- 1 or less
- 2
- 3
- 4
- 5 or more

Source: FCC



Highspeed Internet Providers

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Stamford has historically been prone to various natural hazard events including flooding, hail, thunderstorm winds, winter weather such as blizzards, heavy snow, and extreme cold temperatures and others. While earthquakes are not a typical natural hazard event in Stamford, the City does have a notably higher earthquake index than that of the State of Connecticut and the United States. The potential impacts of climate change—including an increase in prolonged periods of excessively high temperatures, more heavy precipitation, more severe storms or droughts—are often most significant for vulnerable communities. The City sits on the shore of the Long Island Sound and is also located near the coast and is susceptible to various coastal effects. By the middle of the century the average summer temperature is expected to rise four degrees. This rise in temperature could lead to altered weather and precipitation patterns, a rise in severe storms, an increased risk of catastrophic floods, increased electricity costs, and ruined crops. Additionally, any increase in the ocean levels or increased storm activity will lead to people moving from the coast. These environmental changes may eventually lead people away from the coast. However, coastal populations have historically continued to see an increase in population from year to year. An increase of people may drive up housing costs, reduce the availability of jobs, and tax resources, while a decrease in population could cause labor shortages, decrease in competition for services, driving up costs and reducing quality, and reduced resources for locals. Coastal areas must continue to address their geographic challenges by anticipating, planning, and adapting to risks from flooding, sea level rise, and storm surge.

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

Low- and moderate-income residents are at particular risk due to having less available resources to combat the impacts of natural disasters. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. Residents in rural communities will have less access to public support in case of emergencies and will have fewer resources to repair or prevent damage to their homes.

The City of Stamford strives to inform and prepare the general public for multi-hazard mitigation. There are online venues (including the City Public Health & Welfare website and City Facebook page, the Stamford CERT Facebook page, the Connecticut State Division of Emergency Management and Homeland Security website and Twitter page, and the Connecticut Voluntary Organizations Active in Disasters (VOAD) website and Facebook page) that disseminate numerous informational guidebooks, videos, and emergency resources to build disaster resiliency in the community.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Stamford's Strategic Plan outlines the City's overall vision for housing and community development and addresses the City's response to identified needs and priority areas over the next 5 years. The Strategic Plan specifically addresses how Stamford intends to use CDBG and HOME entitlement funds toward furthering HUD's statutory goals of providing safe, decent and affordable housing and providing for suitable living environments for the residents of the City of Stamford.

The City also recognizes that investment is also needed in low- to moderate-income areas throughout Stamford. The City has identified these areas as Qualifying LMI Census Tracts and defined as CDBG eligible tracts. These tracts are found at the Census "Block Group" tract level and listed in the SP-10 Geographic Priorities of this plan. Eligible activities as described by HUD such as improvements to public facilities and infrastructure and vital public services that will assist LMI households and the special needs population (ex. homeless) will be targeted to these areas.

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

Geographic Area

Table 48 - Geographic Priority Areas

1	Area Name:	Qualifying LMI Census Tracts
	Area Type:	>51% LMI
	Other Target Area Description:	>51% LMI
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	See map in the section for boundaries of the LMI block group tracts in the City.
	Include specific housing and commercial characteristics of this target area.	Some qualifying tracts have a high percentage of very old homes with 20% or more housing units built before 1939. Home values in the qualifying tracts are often half the value of the northern tracts.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Low-income areas were identified through the public outreach and consultation with key community stakeholder organizations in the City. As well, this area was determined through the City's institutional knowledge, and use of quantitative data to determine the best use of grant funds.
	Identify the needs in this target area.	<ul style="list-style-type: none"> - Public facilities and infrastructure improvements. - Affordable housing development (new/rehab) - Public services (homeless prevention services)
What are the opportunities for improvement in this target area?	Addressing the needs of the community in qualifying LMI Census block group tracts will improve the quality of life in these areas and attract people and more investment to help create a suitable living environment.	
Are there barriers to improvement in this target area?	Limited funds is a barrier to improvement in the area.	

General Allocation Priorities

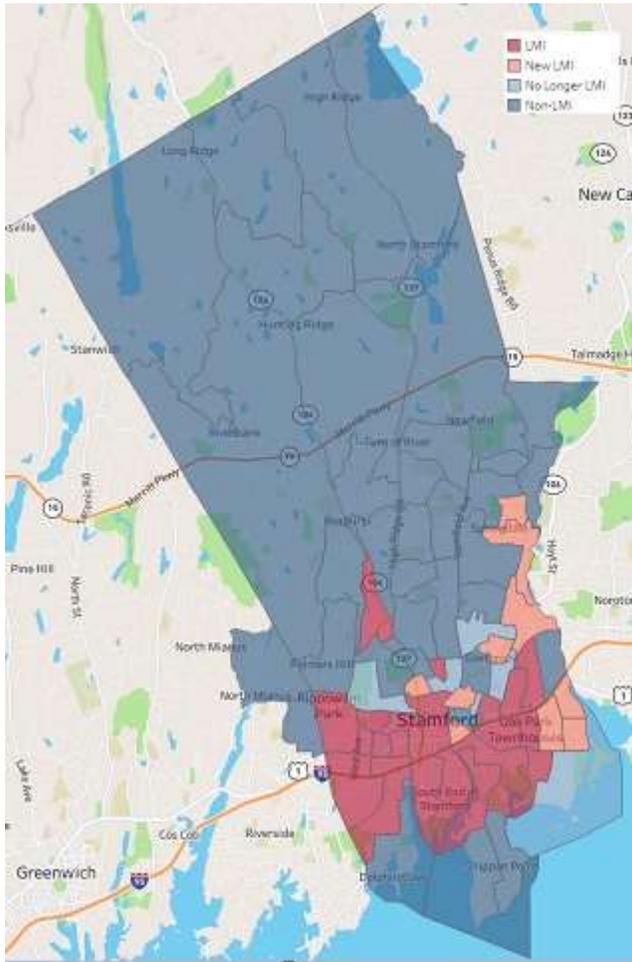
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA

for HOPWA)

As per the Community Development Block Grant program requirements, priority for funding of activities goes to those that directly serve our low-moderate income, and/or benefit the census tracts in which they are concentrated. As CDBG funds continue to dwindle, these block group tracts will remain as in previous years to maximize impact of continued investments:

201.001, 201.002, 201.003, 209002, 210.001, 211.001, 213.001, 214.001, 214.002, 214.003, 214.004, 215.001, 215.002, 215.003, 215.004, 216.001, 216.002, 217.001, 217.002, 217.004, 218.011, 218.022, 218.023, 219.001, 219.002, 219.004, 220.001, 220.002, 221.001, 221.002, 221.003, 222.001, 222.002, 223.001, and 223.003.

Exact location of CDBG funded activities are determined through the CDBG budget development process, in which providers of services/housing/community development activities bring their projects to the City requesting funding.



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

Priority Needs

Table 49 – Priority Needs Summary

1	Priority Need Name	Expand Improve Public Infrastructure & Facilities
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	>51% LMI
	Associated Goals	1A Expand & Improve Public Infrastructure 1B Improve Access to Public Facilities
	Description	Expand and improve public infrastructure and improve access to public facilities that will benefit LMI persons and households. Funds will be used to improve public facilities and neighborhood and community centers.
	Basis for Relative Priority	Through community participation and consultation of local stakeholder partners and organizations the need to Expand and Improve Public Infrastructure & Facilities was identified. Adequate public facilities and infrastructure improvements are essential to addressing the needs of the LMI population, the homeless, and the special needs population.
2	Priority Need Name	Preserve & Develop Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	>51% LMI
	Associated Goals	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunitie 2C Provide for Owner Occupied Housing Rehab

	Description	Preserving the existing housing stock with homeowner and rental housing rehabilitation as well as new homeownership opportunities remain some of the highest priorities in the City.
	Basis for Relative Priority	Through community participation and consultation of local stakeholder partners and organizations the need to Preserve & Develop Affordable Housing was identified. Through the needs assessment housing cost burden is by far the largest housing problem in the jurisdiction. As well, the City is in need of housing rehab as approximately 75% of owner-occupied housing and 52% of renter-occupied housing was built before 1980. Older homes are generally in need of more maintenance and repairs and are also at-risk of lead-based paint hazards. See MA-20 for more details on the condition of housing in Stamford.
3	Priority Need Name	Public Services & Quality of Life Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Non-housing Community Development
	Geographic Areas Affected	>51% LMI
	Associated Goals	3A Provide Supportive Services for Special Needs
	Description	Provide supportive services for LMI households and also the special needs populations in the City. Public services will target LMI citizens and may include services to address homelessness, persons with disabilities, and senior services.
	Basis for Relative Priority	Through community participation and consultation of local stakeholder partners and organizations the need for Public Services for LMI and Special Needs was identified. Public Services offered by the City and partner non-profit organizations provide for vital and essential services for LMI households and families throughout the City.

4	Priority Need Name	Provide for Economic Opportunities
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	>51% LMI
	Associated Goals	4A Provide Financial Assistance New Expanding Busi
	Description	Provide for economic development opportunities that will help assist small businesses. Economic development initiatives that provide assistance for local small businesses will encourage new jobs or job retention.
	Basis for Relative Priority	Through community participation and consultation of local stakeholder partners and organizations the need for economic development opportunities was identified. The City will target LMI areas with economic development opportunities.

Narrative (Optional)

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

Influence of Market Conditions

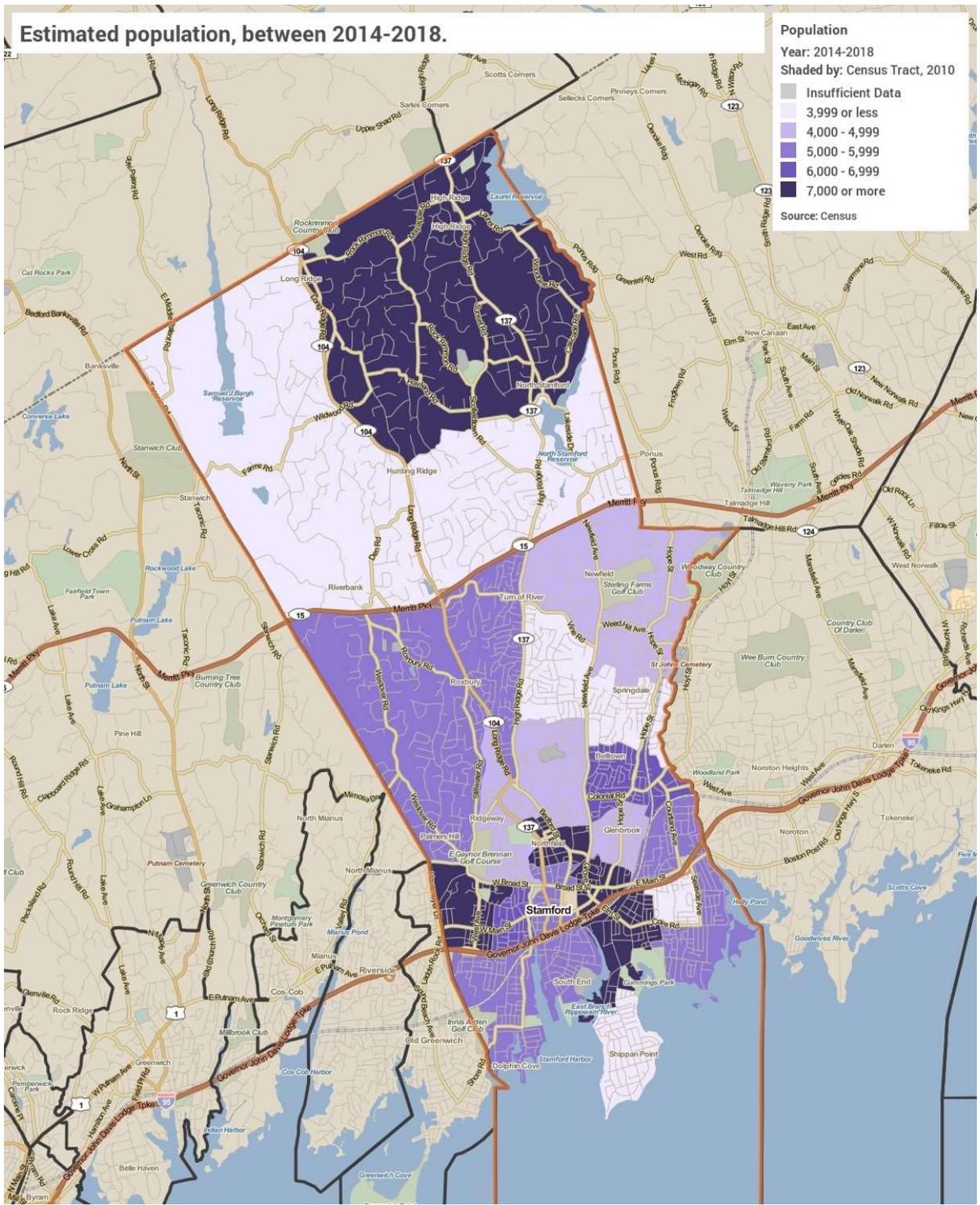
Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Rents are too high. A direct rent subsidy will rapidly deplete HOME funds. Funds will be directed towards rehab or the creation of new affordable housing. See MA-15 for an analysis of the cost of housing, in particular rents in the City which have continued to increase in the last decade.
TBRA for Non-Homeless Special Needs	Rents are too high. A direct rent subsidy will rapidly deplete HOME funds. Funds will be directed towards rehab or the creation of new affordable housing. See MA-15 for an analysis of the cost of housing, in particular rents in the City which have continued to increase in the last decade.
New Unit Production	HOME funds will be used for new construction if proforma on proposed project is feasible. High site assembly/acquisition costs often place development of affordable housing beyond reach of developers. The City will help fund a portion of new development construction to help projects to completion. As documented in the NA, cost burden is the largest housing issue in the City, and the creation of new affordable housing will help alleviate this issue for LMI households.
Rehabilitation	CDBG and HOME funds will be used for rehabilitation of housing to create/sustain affordable housing units. Even rehabilitation will usually require significant other sources of funds as funds are limited. However, the City recognizes that due to the age of housing in the City, rehab assistance of housing is a need for LMI households. Approximately 75% of owner-occupied housing and 52% of renter-occupied housing was built before 1980. See MA-20 for more details on the condition of housing in Stamford.
Acquisition, including preservation	Most HOME funds will be limited to site improvements/construction. As acquisition costs are high, it is best to invest HOME funds in later in the development so that project completion can be assured.

Table 50 – Influence of Market Conditions

Since 2010, the population and number of households in Stamford both grew by approximately 7%. Residents of Stamford have experienced an increase in the median household income, approximately 18%. Unfortunately, due to inflation the purchasing power of residents has not grown as significantly. According to the Bureau of Labor Statistics, a median household income of \$75,579 in 2010 has the same purchasing power as \$86,454 in 2018, an increase of 3.3%.

Population

The following map displays the population density throughout the City. In Stamford, there are two. The downtown tract has fewer than 2,000 people while most tracts have over 4,000. There are also two areas with disproportionately large populations, over 8,000 people.



Population

Change in Population

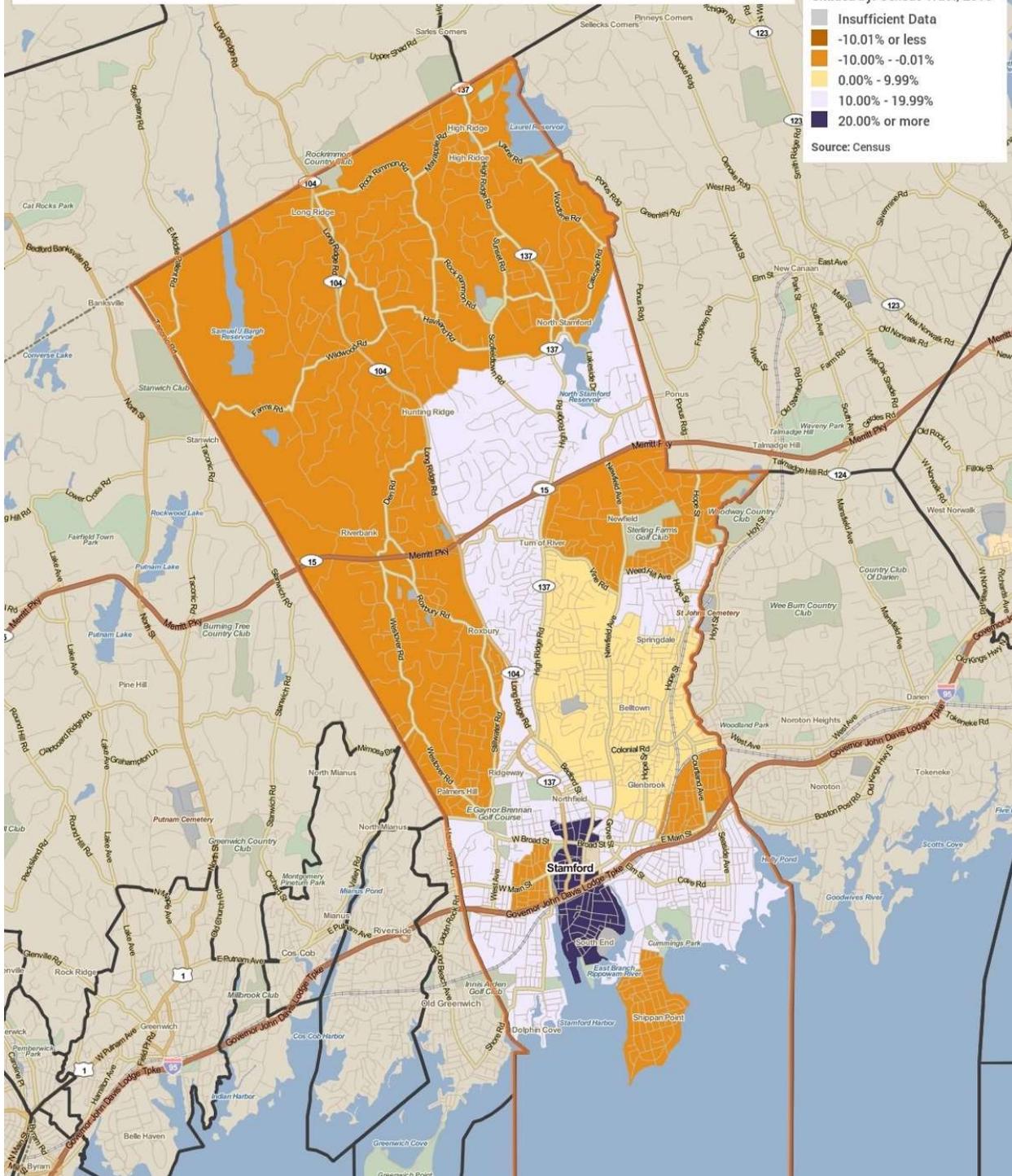
Since 2000, the growth rate across the City has varied significantly. There are multiple tracts where the population decreased while elsewhere the population increased significantly, particularly in the downtown area.

Estimated percent change in the number of people between 2000 and the period of 2014-2018.

Pct Chg in Population
 Year: 2014-2018
 Shaded by: Census Tract, 2010

- Insufficient Data
- 10.01% or less
- 10.00% - -0.01%
- 0.00% - 9.99%
- 10.00% - 19.99%
- 20.00% or more

Source: Census

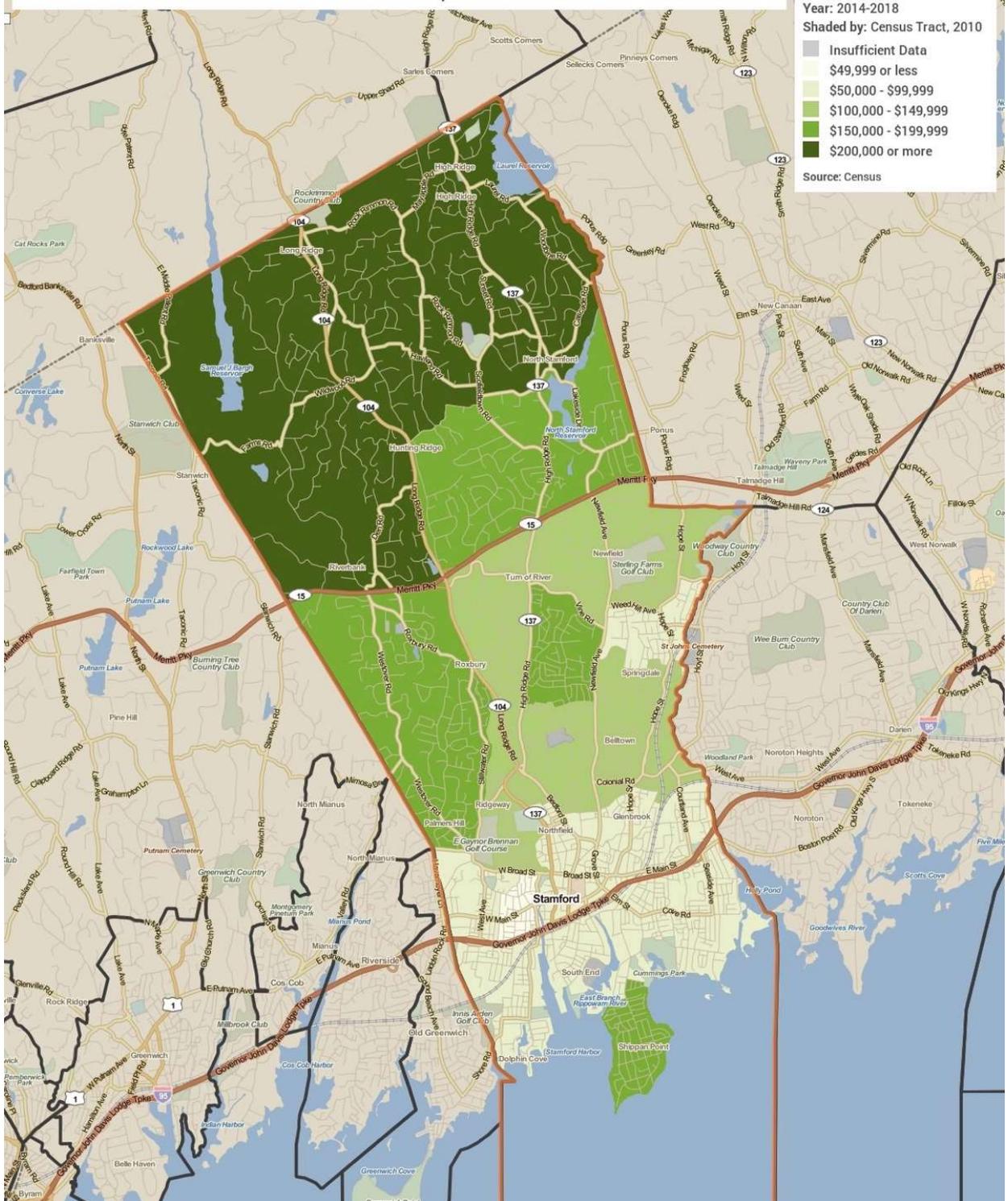


Population Growth

Median Household Income

In Stamford there appears to be a relationship between household income and part of the City a household lives in. The downtown area has a relatively low MHI, under \$50,000. Tracts in the northern area of the City have a median household income that is much higher, over \$200,000.

Estimated median income of a household, between 2014-2018.

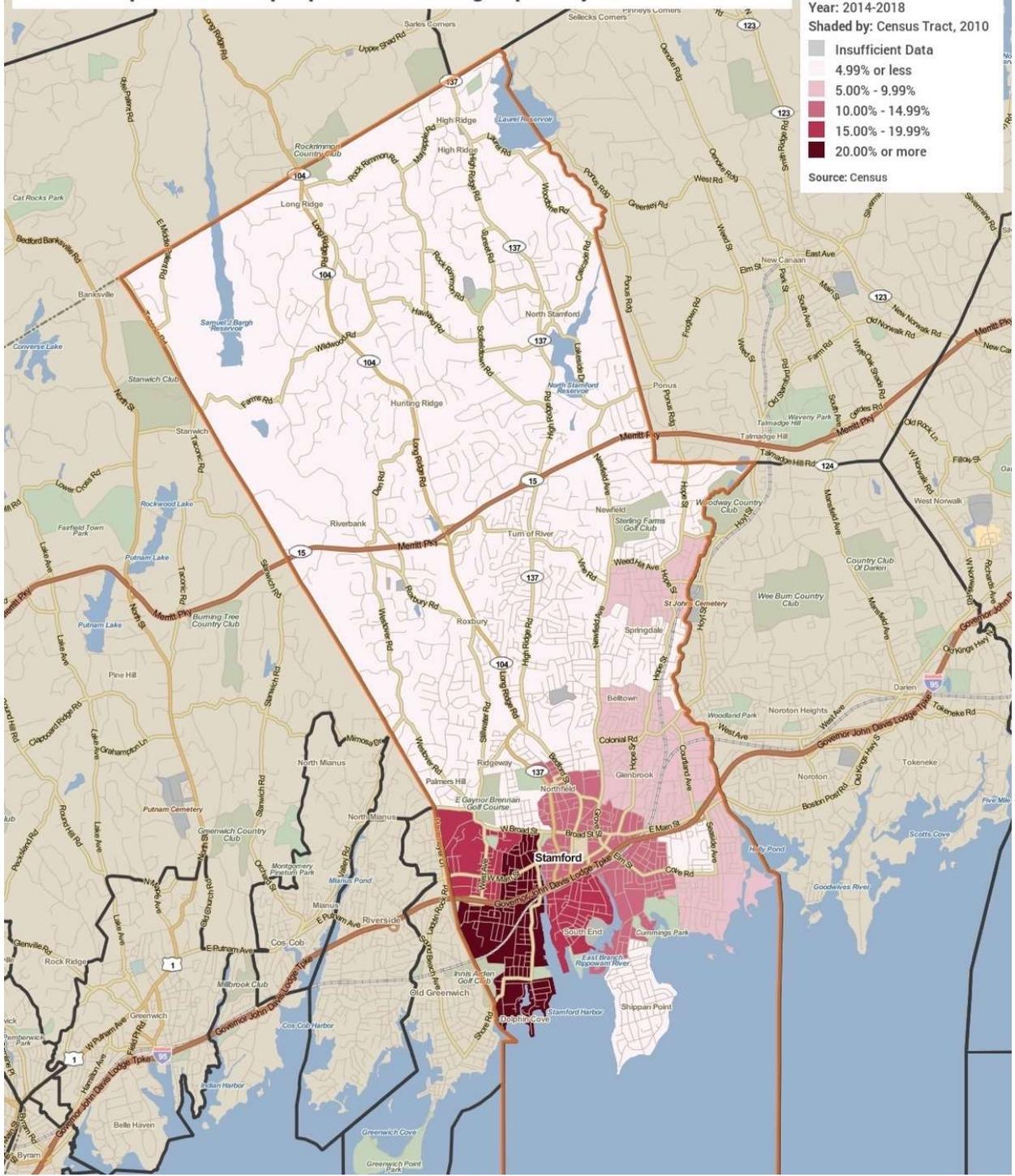


Median Household Income

Poverty

The map below displays the percentage of the population who live below the poverty level by census tract. Unsurprisingly, areas that have higher median income tend to have lower levels of poverty. In tracts with the highest median household income the poverty rate is less than 5%. On the other end of the spectrum, the lowest MHI tract had a poverty rate over 20%.

Estimated percent of all people that are living in poverty as of 2014-2018.



Poverty Rate

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

Introduction

The City of Stamford is expecting to receive HUD entitlement funds of \$976,993 in CDBG and \$418,413 in HOME funds for program year 2020. In addition, there is a projected HOME housing loan program income of \$100,000 that will be used for housing rehabilitation and down payment loans. These funds are shown in the table below.

In addition to HUD federal entitlement funds, the City also expects to receive \$500,000 in Capital funds (HDF) available based on the annual capital budget. The Capital funds is a HOME match and well in excess of its required amount. Other funds are Commercial Building Permit fees collected in the amount of \$134,737 and fees paid by developers in lieu of constructing units on site as required by Zoning in the amount of \$100,000.

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	976,993	0	0	976,993	3,907,972	For City/projects as approved by Board of Representatives during NOFA and public hearing process. Funded entities leverage CDBG funds with private, state and local funds to complete projects.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	418,413	100,000	0	518,413	2,073,652	For housing development, rehabilitation, down payment assistance, and administration. Funded entities leverage HOME funds with private, state and local funds to complete projects.

Table 51 - Anticipated Resources

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

The City awards Community Development Block Grant (CDBG) funds to local organizations through a competitive process and recommends applicants provide matching funds. The City frequently works with developers to use HOME, HDF, IHZ and Linkage funds as necessary to complete any major project. Developers use HOME and CDBG to fill gaps in a major project financing, for example, new unit construction with LIHTC, monies. The advantage of designating units to remain affordable with HOME financing and rents provides developers some flexibility. The HOME program match requirement is satisfied with the use of Capital (HDF) funds. (Note - The City currently has a match well in excess of its required amount.)

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

The City donated a parcel of land to 72 Franklin LLC (a wholly-owned not-for-profit subsidiary of Inspirica, Inc.) to help facilitate the construction of 52 units of deeply affordable rental housing. Garden Homes is working with the City and Inspirica to develop deeply affordable housing on the eastern half of Stanley Court. Garden Homes and Inspirica have indicated they do not intend to seek HUD funds for the project.

Discussion

The only matching funds required for the DHUD funds requested are for the HOME Investment Partnerships Program. The City has exceeded the annual required match for these funds. Any additional match required under this Plan will be provided through City capital budget funds. The City did not budget a set aside this year for housing related purposes.

The City will attempt to leverage funds with its CDBG and HOME investments. HOME regulations have been revised such that more projects may be entirely HOME funded. This is because regulations now require all other project funds to be in place at the time of HOME commitment. This timing is difficult to assure with larger projects progressing through state funding rounds for LIHTC and CHAMP monies.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
STAMFORD	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Charter Oak Communities	PHA	Homelessness Ownership Public Housing Rental	Region
Inspirica	Non-profit organizations	Homelessness	Jurisdiction
Pacific House, Inc.	Non-profit organizations	Homelessness	Jurisdiction
Opening Doors Fairfield County ODFC	Continuum of care	Homelessness	Jurisdiction

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

The City has a strong network of service providers who design programs to meet needs of the low-income population. The City partners with non-profit and other public agencies to implement the proposed community development plan. The City evaluates each activity, and the agencies and organizations, to assess the strengths and gaps in the delivery system. ODFC is working to create a more efficient way of dealing with the requirements that have grown up around the McKinney programs that fund the homeless shelter associated organizations. The City works with ODFC, Pacific House and Inspirica to achieve a single point of entry into the homeless referral system.

The City will continue to work on gaps in the institutional delivery system. This will involve continued work to restructure the Community Development Office. The Community Development Office currently

has a good working relationship with the Health Department and Social Services Department. The Health Department and Social Services Department Committee will continue to request presentations from Land Use and Zoning as we seek to modify local Zoning to encourage the development of "deeply affordable" housing.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education			
Employment and Employment Training	X		
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X		
Mental Health Counseling	X	X	X
Transportation	X		
Other			
	X		

Table 53 - Homeless Prevention Services Summary

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

The City of Stamford has a long tradition of working with the Continuum of Care (CoC) in providing services that work to meet the needs of the homeless of all demographics and household types in Stamford. The City has participated in the area Continuum of Care by having City staff serve on its committees and Executive Board. With the merger of neighboring CoCs and the creation of the Fairfield

County CoC, also known as Opening Doors Fairfield County (ODFC), the City remains involved and maintains a seat on the Coordinating Committee. ODFC strives to integrate resources serving a homeless/sheltered community that moves up and down the I-95 corridor. The City has actively supported homeless/special populations housing with HOME funds and CDBG funds. HOME funds have helped create new transitional housing units, and CDBG supports day service programs to homeless, life coaching for women and families that are homeless, and improvements to shelter facilities.

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

The City has a strong group of service providers for homeless individual and families. The City supports local specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts, and especially to establish a "one point" universal intake for homeless, which would assess needs and begin the shelter and counselor/resource referral process. CDBG funds support a Day Drop In program for the homeless, in addition to a life planning coach for the homeless at Inspirica. Funds are also provided to support the mental health needs of homeless youth.

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

The City will continue to work closely with the CoC to develop the City's strategy in delivering activities that address the homeless priority needs of the community. For this, the City participates in the area Continuum of Care by having City staff serve on its committees and Executive Board.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Expand & Improve Public Infrastructure	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$1,064,068	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 250000 Persons Assisted
2	1B Improve Access to Public Facilities	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$1,064,069	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 250000 Persons Assisted
3	2A Increase Homeownership Opportunities	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	HOME: \$1,296,032	Homeowner Housing Added: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted
4	2B Increase Affordable Rental Housing Opportunitie	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	HOME: \$1,296,033	Rental units constructed: 10 Household Housing Unit Rental units rehabilitated: 250 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	2C Provide for Owner Occupied Housing Rehab	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	CDBG: \$1,413,116	Homeowner Housing Rehabilitated: 250 Household Housing Unit
6	3A Provide Supportive Services for Special Needs	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Qualifying LMI Census Tracts	Public Services & Quality of Life Improvements	CDBG: \$913,321	Public service activities other than Low/Moderate Income Housing Benefit: 250000 Persons Assisted Homelessness Prevention: 500 Persons Assisted
7	4A Provide Financial Assistance New Expanding Busi	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Provide for Economic Opportunities	CDBG: \$430,391	Businesses assisted: 50 Businesses Assisted

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	1A Expand & Improve Public Infrastructure
	Goal Description	Expand public infrastructure through development activities for LMI persons and households. Activities can include adding ADA compliance for curb ramps and sidewalks, roadway expansion projects, and improve water and sewer systems.
2	Goal Name	1B Improve Access to Public Facilities
	Goal Description	Expand public facilities through development activities for LMI persons and households. Activities can include improved access to neighborhood & community centers and parks and recreation centers.

3	Goal Name	2A Increase Homeownership Opportunities
	Goal Description	Provide for increased homeownership opportunities for LMI households.
4	Goal Name	2B Increase Affordable Rental Housing Opportunitie
	Goal Description	Provide for renter occupied housing rehabilitation. These activities will benefit LMI households.
5	Goal Name	2C Provide for Owner Occupied Housing Rehab
	Goal Description	Provide for owner occupied housing rehabilitation. These activities will benefit LMI households.
6	Goal Name	3A Provide Supportive Services for Special Needs
	Goal Description	The City will provide supportive services for special needs populations such as senior services for the elderly, services for persons with a disability and homeless services for persons experiencing homelessness.
7	Goal Name	4A Provide Financial Assistance New Expanding Busi
	Goal Description	Provide economic development support using funds to assist small businesses to create and retain jobs.

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

The City estimates that over the 5-Year Consolidated Plan it will assist LMI households with these housing activities:

Homeowner Housing Added: 10 Household Housing Unit

Direct Financial Assistance to Homebuyers: 15 Households Assisted

Rental units rehabilitated: 250 Household Housing Unit

Homeowner Housing Rehabilitated: 250 Household Housing Unit

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Housing Authority of the City of Stamford, dba Charter Oak Communities (PHA), successfully rebranded itself and is a model agency for redevelopment and community creation. Charter Oak Communities receives federal funds from the U.S. Department of HUD and maintains its own staff. The PHA has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District 9 West Side/Census Tracts 214 and 215).

Activities to Increase Resident Involvements

The Housing Authority will continue to address the need for tenants to increase income through education, counseling and job training. Charter Oak Communities will continue its efforts to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development. PHA staff will be trained on their role in Section 504, Limited English Proficiency, and fair housing guidelines. Charter Oak Communities will seek to enhance rent billing and collection activities to ensure they are accomplished in the most effective and cost-efficient way. The Charter Oak Communities website will be replaced and the records retention policy implementation is ongoing (digital image storage and archiving of centralized program participant files.) Procurement will be reviewed with the goal of adopting an e-procurement (online) approach. The City will provide local capital funds (HDF - Housing Development Funds) and a loan from the Commercial Linkage fund for the construction of affordable units in a project known as Park 215 located at 215 Stillwater Ave. Linkage funds may also be used for the redevelopment of Lawnhill Terrace 3 - 52 units (25% - 60% AMI).

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

No

Plan to remove the ‘troubled’ designation

N/A

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

Barriers to Affordable Housing

The City's latest update to its Impediments to Fair Housing Analysis and Plan indicated the following actions should be taken to overcome impediments:

- Increase home ownership opportunities for low-moderate income buyers;
- Improve quality and number of affordable rental units to provide choice for low-moderate income renters;
- Improve access to housing opportunities for low-moderate income people.

Barriers cited above included the funds needed to create and subsidize deeply affordable rental housing, and income/rent limits used by federal programs in a high cost housing area. Access to credit for families/individuals disproportionately affected by housing problems needs to be addressed as well.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City will use the HOME down payment program to provide financing to low income tenants to become homeowners. The program allows a low-moderate income borrower to purchase a unit they can afford anywhere within Stamford. More importantly, in the Stamford housing market, any unit held for a period of time has historically gained value. A family assisted with a down payment loan is often on the way to building wealth through equity that will enable even greater housing choice with their next purchase. HOME funds will also be used to keep units affordable and safe through rehabilitation and new construction. Funds are made available to private property owners and non-profit developers. The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants for assistance will also be successful in obtaining conventional loans. The City is willing to engage Realtors and banks to stress the need to provide fair and equal access to conventional financing. The City will continue to work with LIHTC projects that by definition provide housing to very low-income persons. For example, HOME funds have recently been used in a transit oriented affordable housing rental property. Meanwhile, we will continue to discuss with HUD the limits provided for maximum purchase price/housing value under HOME in a high cost area. The City will periodically review the Inclusionary Housing Zoning regulation to encourage the creation of housing accessible to individuals and families at a lower income level. During 2020-2021 numerous meetings were held to review the regulation.

SP-60 Homelessness Strategy – 91.215(d)

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

The City supports the specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts, and especially to establish a "one point" universal intake for homeless, which would assess needs and begin the shelter and counselor/resource referral process. CDBG funds will support a Day Drop In program for the homeless, in addition to a life planning coach for the homeless at Inspirica. Funds are also provided to support the mental health needs of homeless youth.

Addressing the emergency and transitional housing needs of homeless persons

The City works closely with Stamford's shelters to assure their buildings are maintained and improved to meet the needs of the sheltered, and that transitional housing opportunities are available. An example of this would be a roof replacement for Inspirica's women and family shelter. Previous HOME awards assisted construction of new transitional units (Fairfield Commons, 38 Ann St., 23 Spruce St.).

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.

The City has assisted in creation and renovation of the transitional housing units critical to offering a stable housing opportunity to those who are homeless while providing counseling for development of skills necessary to obtain permanent housing and maintain continued occupancy of that housing. The City, through HOME and its Zoning has created Below Market Rate housing which provides options for an individual or family seeking permanent housing in a high cost housing market. The City has supported applications by the ODFC/CoC for rapid rehousing funds. City CDBG funds public services counseling programs which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. Kids in Crisis and Child Guidance Center funded programs address the mental health of homeless youth.

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

In a high housing cost area, households and individuals facing a loss of income still need to "make the rent." The services funded through CDBG, like the Food Bank and Senior Prescription Drug Program, assist these families in stretching their resources. There is also the need to increase the number of affordable units, which is done with HOME participation in the creation of affordable housing units. Getting and keeping employment is addressed through personal counseling and job skills training at our shelter facilities. Community Business Development Organizations assist in job creation at the local, neighborhood level. For those impacted by domestic violence, counseling and emergency assistance/shelter is provided by support of the Domestic Violence and Safe House Advocacy. Agreements between DMHAS and Correction/Court facilities ensure shelters are informed of institutional discharge so that people don't just "hit the street."

Discussion

As CDBG and HOME fund awards become smaller, the City of Stamford is committed to funding services and projects that meet the needs of the most vulnerable - the homeless, children needing mental health services and protection, families and children that need housing, and agencies that work with these vulnerable populations.

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

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

City programs are enhanced by the services available through its own municipal departments and via its linkages with various community agencies and programs. Using a coordinated system reciprocal referrals and information sharing with Building, Fire, Social Services and Zoning/Land-use, Stamford has built a community network able to address housing related needs. The Health Department services include prenatal and well child care, school and public health nursing, and the Women, Infant, and Children (WIC) nutrition program. As part of the child case management the Environmental Inspections Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning. The City of Stamford Health Department has knowledgeable staff that can assist with any questions regarding lead. The Health Department Laboratory Division provides finger screening on Mondays and Wednesdays. The Health Department is also responsible for investigating cases of lead poisoned children six years of age and younger with lead levels 10ug/dl or greater. The investigation entails an interview with the family, visual inspection of the premises, and paint chip, soil, and/or dust samples obtained for analysis. If the results indicate lead is present in the home, the owner will be responsible for abating the lead using a certified lead abatement contractor to remove the lead to assure proper removal and clean-up. The local health department sends a reminder test letter to parents/guardians for capillary results 5-9 µg/ dl. The level of concern has now been lowered from 10 µg/dl to 5 µg/dl. The new protocol went into effect on July 1, 2013. Any CDBG and HOME funded projects (residential) in pre-1978 structures are tested for lead-based paint hazards. If lead is present the sub-recipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

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

The City of Stamford has a great need for housing rehabilitation. The housing stock in the City is relatively old and as these homes age there is an increasing need for rehabilitation to maintain safe and secure units. It is particularly important to assist low-income households that live in older homes. See MA-20 Housing Market Analysis: Condition of Housing for more information.

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

Please see above the how the City will address LBP hazards and how they are integrated into housing policies and procedures. The City uses a coordinated system with all its departments. All housing inspected for prospective renovation must be evaluated for Lead hazard, as per our policies and procedures. If lead is present, the costs of addressing this is included in the rehabilitation work write up for bidding. Final clearance is obtained through Health Department inspection as mentioned above as well as any health screenings and investigations to cases of lead poisoning in children.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City's strategy for anti-poverty is to work closely with and fund a number of local organizations to run activities that reduce poverty in Stamford. Pacific House, Inc. is funded to assist poverty-level individuals acquire the skills they need to expand their employment opportunities. Inspirica is funded to offer families access to programs to develop skills to rise from poverty. A program to help immigrants obtain the necessary documents to establish them as legal workers is also funded with the intention of empowering and educating immigrants to ensure they are not abused and have the skills to seek employment. Continued counseling and training of those with low income who reside in Charter Oak Communities associated developments will assist these families in increasing their income.

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

The goals and activities identified in this Plan directly work towards reducing poverty for individuals and families in Stamford. Vital public services funded by the City to local nonprofits and agencies work towards helping LMI households achieve and maintain economic self-sustainability. CDBG and HOME programs will identify LMI households that are in need of affordable housing assistance.

SP-80 Monitoring – 91.230

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

CDBG Monitoring – Community Development (CD) staff review the Independent Audits for all subrecipients at the time of application and immediately prior to entering into a contract. CD staff meet with public service and economic development subgrantees' staff both on-and off-site as needed to review program procedures and accomplishments, and assure accuracy in reporting and timeliness in expenditures. Housing and public improvement activities were monitored on-site. Agencies targeted are those who have recently changed staff and/or must design their own CDBG compliant intake-service client monitoring, for example, economic development recipients. CD staff meet with agency staff to provide technical assistance. When an agency is selected, their review includes: Adherence to implementation of scope of service in accordance with the executed agreement; Review of unduplicated client income and race/ethnicity and intake form providing data; Review of performance measurements; Documentation of request for payments; Record keeping – file retention, availability and accessibility of data. Site visits include interviews with staff and review of service files to assure compliance with low-moderate income benefit requirements and contracting/accounting procedures. A remote monitoring is performed for each Subrecipient Activity Report or Request for Payment. All work related to construction progress payments is inspected by CD staff and/or City inspectors. CD staff conduct on-site interviews of workers subject to Davis Bacon wage rates, and conduct desk reviews of certified payroll reports.

HOME Monitoring - A HOME program monitoring log lists all properties, site contacts, date of last inspection and next required date of inspection. CD uses the City Building/Health departments to complete inspections. Tenant records are reviewed for projects in the affordability period. Tenancy reports are due by March 1st; a reminder letter is sent with new HUD income levels and rents. All HOME units reporting are compliant. City staff follows up with non-reporting landlords. Administrative site visits are made to assure compliance. The CD staff uses a combination of on- and off-site monitoring mechanisms. CD requires documentation for all requests for payment prior to release of funds. CD staff reviews and approves every request for payment. All work related to construction progress payments are signed off by a project architect and/or City inspector. The site is visited by an CD staff member, who photographs projects. CD conducts on-site interviews of workers subject to Davis Bacon wage rates, and conducts desk reviews of certified payroll reports.

For HOME down-payment loans income and property eligibility are reviewed. Before closing, the Health Dept. inspects for code violations and buyers must address any deficiencies. Newly constructed units must have the City Certificate of Occupancy. Continued occupancy is monitored as part of the mortgage portfolio maintenance process. For example, any notification of payoff, or lis pendens, is used to target the property for additional tenancy evaluation.

Expected Resources

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

Introduction

The City of Stamford is expecting to receive HUD entitlement funds of \$976,993 in CDBG and \$418,413 in HOME funds for program year 2020. In addition, there is a projected HOME housing loan program income of \$100,000 that will be used for housing rehabilitation and down payment loans. These funds are shown in the table below.

In addition to HUD federal entitlement funds, the City also expects to receive \$500,000 in Capital funds (HDF) available based on the annual capital budget. The Capital funds is a HOME match and well in excess of its required amount. Other funds are Commercial Building Permit fees collected in the amount of \$134,737 and fees paid by developers in lieu of constructing units on site as required by Zoning in the amount of \$100,000.

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: \$		

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	976,993	0	0	976,993	3,907,972	For City/projects as approved by Board of Representatives during NOFA and public hearing process. Funded entities leverage CDBG funds with private, state and local funds to complete projects.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	418,413	100,000	0	518,413	2,073,652	For housing development, rehabilitation, down payment assistance, and administration. Funded entities leverage HOME funds with private, state and local funds to complete projects.

Table 55 - 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

The City awards Community Development Block Grant (CDBG) funds to local organizations through a competitive process and recommends applicants provide matching funds. The City frequently works with developers to use HOME, HDF, IHZ and Linkage funds as necessary to complete any major project. Developers use HOME and CDBG to fill gaps in a major project financing, for example, new unit construction with LIHTC, monies. The advantage of designating units to remain affordable with HOME financing and rents provides developers some flexibility. The HOME program match requirement is satisfied with the use of Capital (HDF) funds. (Note - The City currently has a match well in excess of its required amount.)

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

The City donated a parcel of land to 72 Franklin LLC (a wholly-owned not-for-profit subsidiary of Inspirica, Inc.) to help facilitate the construction of 52 units of deeply affordable rental housing. Garden Homes is working with the City and Inspirica to develop deeply affordable housing on the eastern half of Stanley Court. Garden Homes and Inspirica have indicated they do not intend to seek HUD funds for the project.

Discussion

The only matching funds required for the DHUD funds requested are for the HOME Investment Partnerships Program. The City has exceeded the annual required match for these funds. Any additional match required under this Plan will be provided through City capital budget funds. The City did not budget a set aside this year for housing related purposes.

The City will attempt to leverage funds with its CDBG and HOME investments. HOME regulations have been revised such that more projects may be entirely HOME funded. This is because regulations now require all other project funds to be in place at the time of HOME commitment. This timing is difficult to assure with larger projects progressing through state funding rounds for LIHTC and CHAMP monies.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Expand & Improve Public Infrastructure	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$212,813	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted
2	1B Improve Access to Public Facilities	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$212,814	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted
3	2A Increase Homeownership Opportunities	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	HOME: \$259,207	Homeowner Housing Added: 2 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted
4	2B Increase Affordable Rental Housing Opportunitie	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	HOME: \$259,207	Rental units constructed: 2 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	2C Provide for Owner Occupied Housing Rehab	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	CDBG: \$282,623	Homeowner Housing Rehabilitated: 50 Household Housing Unit
6	3A Provide Supportive Services for Special Needs	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Qualifying LMI Census Tracts	Public Services & Quality of Life Improvements	CDBG: \$182,664	Public service activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted Homelessness Prevention: 100 Persons Assisted
7	4A Provide Financial Assistance New Expanding Busi	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Provide for Economic Opportunities	CDBG: \$86,078	Businesses assisted: 10 Businesses Assisted

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	1A Expand & Improve Public Infrastructure
	Goal Description	Expand public infrastructure through development activities for LMI persons and households. Activities can include adding ADA compliance for curb ramps and sidewalks, roadway expansion projects, and improve water and sewer systems.
2	Goal Name	1B Improve Access to Public Facilities
	Goal Description	Expand public facilities through development activities for LMI persons and households. Activities can include improved access to neighborhood & community centers and parks and recreation centers.

3	Goal Name	2A Increase Homeownership Opportunities
	Goal Description	Provide for increased homeownership opportunities for LMI households.
4	Goal Name	2B Increase Affordable Rental Housing Opportunitie
	Goal Description	Provide for renter occupied housing rehabilitation. These activities will benefit LMI households.
5	Goal Name	2C Provide for Owner Occupied Housing Rehab
	Goal Description	Provide for owner occupied housing rehabilitation. These activities will benefit LMI households.
6	Goal Name	3A Provide Supportive Services for Special Needs
	Goal Description	The City will provide supportive services for special needs populations such as senior services for the elderly, services for persons with a disability and homeless services for persons experiencing homelessness.
7	Goal Name	4A Provide Financial Assistance New Expanding Busi
	Goal Description	Provide economic development support using funds to assist small businesses to create and retain jobs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects selected for funding are consistent with the Consolidated Plan, and were presented by the community as critical. They have been approved by the City's Board of Representatives.

Projects

#	Project Name
1	CDBG: Administration
2	CDBG: Public Facilities & Infrastructure
3	CDBG: Housing Programs
4	CDBG: Public Services
5	CDBG: Economic Development
6	HOME: Administration (10%)
7	HOME: CHDO Reserves (15%)
8	HOME: Non-CHDO Development Activities (75%)

Table 57 – Project Information

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

The City's Board of Representatives emphasizes funding programs/projects that benefit the most vulnerable: homeless and those at risk of homelessness. Neighborhood organizations are funded to provide programs and services to improve the quality of life for low-moderate income residents.

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG: Administration
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	1A Expand & Improve Public Infrastructure 1B Improve Access to Public Facilities 2C Provide for Owner Occupied Housing Rehab 3A Provide Supportive Services for Special Needs 4A Provide Financial Assistance New Expanding Busi
	Needs Addressed	Expand Improve Public Infrastructure & Facilities Preserve & Develop Affordable Housing Public Services & Quality of Life Improvements Provide for Economic Opportunities
	Funding	CDBG: \$180,391
	Description	Administration costs for CDBG, HOME, NSP and HUD programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Administration of the CDBG program.
2	Project Name	CDBG: Public Facilities & Infrastructure
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	1A Expand & Improve Public Infrastructure 1B Improve Access to Public Facilities
	Needs Addressed	Expand Improve Public Infrastructure & Facilities
	Funding	CDBG: \$353,471
	Description	Public facility activities will address building and site improvements to homeless shelters, a child care center, a mental health facility and a facility for the disabled.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100,000 Persons Assisted
	Location Description	Citywide

	Planned Activities	Planned activities include: Contingency (\$14,253) - Abilis, Inc., Generator Installation 94 Turn of River Road: \$14,300 - Children's Learning Center, Upgrade Security Cameras: \$83,621 - Boys & Girls Club of Stamford, Inc., Clubhouse Heating & Cooling System: \$45,200 - Pacific House, Kitchen Improvements: \$25,097 - Inspirica, Inc., Franklin Commons Security Enhancement: \$86,000 - ARI of Ct Inc., Elevator Modernization: \$85,000
3	Project Name	CDBG: Housing Programs
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2C Provide for Owner Occupied Housing Rehab
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	CDBG: \$246,545
	Description	Housing activities will include the provision of historic design services for CDBG funded projects, rehabilitation of 10 units of low-income housing of owner-occupied homes.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 50 LMI Household Housing Unit
	Location Description	Citywide
	Planned Activities	Planned activities include: Contingency (\$14,253) Housing Authority, Schofield Manor rehab: \$32,292 Stamford Community Development, Housing Development Program: \$200,000
4	Project Name	CDBG: Public Services
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	3A Provide Supportive Services for Special Needs
	Needs Addressed	Public Services & Quality of Life Improvements

	Funding	CDBG: \$146,586
	Description	The projects selected for funding are consistent with the Consolidated Plan, and were presented by the community as critical. They have been approved by the City's Board of Representatives.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted Homelessness Prevention: 100 Persons Assisted
	Location Description	Citywide
	Planned Activities	Planned public service activities include: <ul style="list-style-type: none"> - Kids in Crisis, Inc., Safe Haven for Kids: \$10,000 - Boys & Girls Club, Summer Day Camo: \$25,000 - Food Bank of Fairfield County, Manager: \$21,000 - Bartlett Arboretum Association Inc, Garden Club Scholarship Program: \$7,000 - Pacific House, Day Drop-in Program: \$10,000 - Silversource Inc, Elderly RX: \$15,000 - Rowan Center Inc, Sexual Assault Crisis/Counseling Service: \$9,293 - Community Health Center, Senior Dental Care: \$10,000 - Inspirica, Inc., Women Housing Life Coach: \$10,000 - Person to Person, Mobile Food Pantry on Wheels: \$20,000 - Saint Joseph Parenting Center, Child Abuse Prevention: \$9,293
5	Project Name	CDBG: Economic Development
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	4A Provide Financial Assistance New Expanding Busi
	Needs Addressed	Provide for Economic Opportunities
	Funding	CDBG: \$50,000
	Description	Economic development funds for microenterprise assistance West Side Neighborhood Community Revitalization.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Businesses assisted: 10 Businesses Assisted
	Location Description	Citywide
	Planned Activities	Planned activities include: Contingency (\$9,502) Small business assistance: \$50,000
6	Project Name	HOME: Administration (10%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunitie
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$51,773
	Description	Staff and operating costs related to HOME funding.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Administration of the HOME program.
7	Project Name	HOME: CHDO Reserves (15%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunitie
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$77,773
	Description	Funds reserved for CHDO housing development per regulation.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added: 2 Household Housing Unit Rental units constructed: 2 Household Housing Unit
	Location Description	Citywide
	Planned Activities	CHDO housing development
8	Project Name	HOME: Non-CHDO Development Activities (75%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunitie
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$388,867
	Description	Funds will be used for rental development and rehabilitation, down payment assistance. Developments to be funded have not yet been designated. Applications from a NOFA for funding will be made early in the year.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Rental units rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted
	Location Description	Citywide
	Planned Activities	Rental units rehabilitated Direct Financial Assistance to LMI Homebuyers

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

Assistance is directed to the areas that are known to hold Stamford's highest concentration of low-income and minority/ethnic groups. Funds will be directed to the five neighborhoods described as the target area in the City's Consolidated Plan. These five neighborhoods, covering nine census tracts, show concentrations of low-income residents in excess of 51% of the population of the Census Tract or Block Group. The neighborhoods are locally known as the Westside, South End, Waterside, Eastside and Downtown (residential only).

As CDBG funds continue to dwindle, these block group tracts will remain as in previous years to maximize impact of continued investments:

201.001, 201.002, 201.003, 209002, 210.001, 211.001, 213.001, 214.001, 214.002, 214.003, 214.004, 215.001, 215.002, 215.003, 215.004, 216.001, 216.002, 217.001, 217.002, 217.004, 218.011, 218.022, 218.023, 219.001, 219.002, 219.004, 220.001, 220.002, 221.001, 221.002, 221.003, 222.001, 222.002, 223.001, and 223.003.

Exact location of CDBG funded activities are determined through the CDBG budget development process, in which providers of services/housing/community development activities bring their projects to the City requesting funding.

Geographic Distribution

Target Area	Percentage of Funds
Qualifying LMI Census Tracts	100

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has historically adopted this approach and believes that it maximizes the benefit to the CDBG eligible population.

Discussion

The latest census data was evaluated, as was data provided by HUD indicating areas with income eligible populations. Data provided through mapping/data function in IDIS differed somewhat from data provided at the HUD Exchange site. As CDBG awards have dwindled, funds will continue to be directed to areas that had previously benefitted from CDBG funds. Future allocations will build upon previous impact/benefits of CDBG activity.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Below is a breakdown of estimated households to be assisted with affordable housing activities:

Homeowner Housing Added: 2 Household Housing Unit

Direct Financial Assistance to Homebuyers: 3 Households Assisted

Rental units constructed: 2 Household Housing Unit

Rental units rehabilitated: 50 Household Housing Unit

Homeowner Housing Rehabilitated: 50 Household Housing Unit

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	107
Special-Needs	0
Total	107

Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	7
Rehab of Existing Units	100
Acquisition of Existing Units	0
Total	107

Table 60 - One Year Goals for Affordable Housing by Support Type
Discussion

Assistance provided to the homeless is counted in homeless persons. Inspirica, Inc. women's shelter provides assistance to homeless families, but in a dorm setting and reports beneficiaries as persons.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the City of Stamford, dba Charter Oak Communities (PHA), successfully rebranded itself and is a model agency for redevelopment and community creation. The PHA receives federal funds from the U.S. Department of HUD and maintains its own staff. The PHA has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District (West Side/Census Tracts 214 and 215).

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

See above. Charter Oak Communities (PHA), successfully rebranded itself and is a model agency for redevelopment and community creation. Charter Oak Communities receives federal funds from HUD and maintains its own staff. Charter Oak Communities has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District 9West Side/Census Tracts 214 and 215).

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

Charter Oak Communities will continue to address the need for tenants to increase income through education, counseling and job training. The PHA will continue its efforts to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development. Charter Oak Communities staff will be trained on their role in Section 504, Limited English Proficiency, and fair housing guidelines. The PHA will seek to enhance rent billing and collection activities to ensure they are accomplished in the most effective and cost-efficient way. The PHA website will be replaced and the records retention policy implementation is ongoing (digital image storage and archiving of centralized program participant files.) Procurement will be reviewed with the goal of adopting an e-procurement (online) approach. The City will provide local capital funds (HDF - Housing Development Funds) and a loan from the Commercial Linkage fund for the construction of affordable units in a project known as Park 215 located at 215 Stillwater Ave. Linkage funds may also be used for the redevelopment of Lawnhill Terrace 3 - 52 units (25% - 60% AMI).

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

The PHA is not designated as troubled.

Beginning with its 2000 HOPE VI grant, Charter Oak Communities has provided avenues for tenants to transition to home ownership. This has continued through redevelopment of the Fairfield Court units to Fairgate. Charter Oak Communities established building councils for each of its developments. These councils review proposed funding of projects that impact their buildings. They were vital in several building renovation projects which involved temporary and permanent relocation of tenants. Now these councils are used as sounding boards for the development of requests for uses of PHA capital funds and refinancing. Charter Oak Communities will seek to develop a plan to create an endowment for supportive service programs administered within the various affordable housing programs. Resident-led initiatives including public housing resident-to-resident community service programs have and will continue to engage residents in activities which improve the quality of life for all residents. Residents become "stakeholders" and participate in public housing revitalization, from planning through operations which strengthens the growth and development of the community.

Discussion

The City has undertaken a number of studies in the past years which focus on the Vita Health and Wellness area - specifically a West Side Traffic Study and a Stillwater Corridor Master Plan - looking at roadways, complete streets, walking paths, bikeability, intersections, traffic calming, safety, lighting, beautification and how to improve connections to downtown and the intermodal transit facility and local recreational facilities. Over the coming years as the recommendations of the various plans are implemented the foundation laid by Charter Oak Communities will position the properties in its portfolio as a model for redevelopment.

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

Introduction

The City of Stamford has long participated in the area Continuum of Care by having City staff serve on its committees and Executive Board. With the merger of neighboring CoCs and the creation of the Fairfield County CoC, also known as Opening Doors Fairfield County (ODFC), the City remains involved and maintains a seat on the Coordinating Committee. ODFC strives to integrate resources serving a homeless/sheltered community that moves up and down the I-95 corridor. The City has actively supported homeless/special populations housing with HOME funds and CDBG funds. HOME funds have helped create new transitional housing units, and CDBG supports day service programs to homeless, life coaching for women and families that are homeless, and improvements to shelter facilities.

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

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

The City supports the specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts, and especially to establish a "one point" universal intake for homeless, which would assess needs and begin the shelter and counselor/resource referral process. CDBG funds will support a Day Drop In program for the homeless, in addition to a life planning coach for the homeless at Inspirica. Funds are also provided to support the mental health needs of homeless youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works closely with Stamford's shelters to assure their buildings are maintained and improved to meet the needs of the sheltered, and that transitional housing opportunities are available. An example of this would be a roof replacement for Inspirica's women and family shelter. Previous HOME awards assisted construction of new transitional units (Fairfield Commons, 38 Ann St., 23 Spruce St.).

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

The City has assisted in creation and renovation of the transitional housing units critical to offering a stable housing opportunity to those who are homeless while providing counseling for development of

skills necessary to obtain permanent housing and maintain continued occupancy of that housing. The City, through HOME and its Zoning has created Below Market Rate housing which provides options for an individual or family seeking permanent housing in a high cost housing market. The City has supported applications by the ODFC/CoC for rapid rehousing funds. City CDBG funds public services counseling programs which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. Kids in Crisis and Child Guidance Center funded programs address the mental health of homeless youth.

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

In a high housing cost area, households and individuals facing a loss of income still need to "make the rent." The services funded through CDBG, like the Food Bank and Senior Prescription Drug Program, assist these families in stretching their resources. There is also the need to increase the number of affordable units, which is done with HOME participation in the creation of affordable housing units. Getting and keeping employment is addressed through personal counseling and job skills training at our shelter facilities. Community Business Development Organizations assist in job creation at the local, neighborhood level. For those impacted by domestic violence, counseling and emergency assistance/shelter is provided by support of the Domestic Violence and Safe House Advocacy. Agreements between DMHAS and Correction/Court facilities ensure shelters are informed of institutional discharge so that people don't just "hit the street."

Discussion

As CDBG and HOME fund awards become smaller, the City of Stamford is committed to funding services and projects that meet the needs of the most vulnerable - the homeless, children needing mental health services and protection, families and children that need housing, and agencies that work with these vulnerable populations.

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

Introduction:

The City's latest update to its Impediments to Fair Housing Analysis and Plan indicated the following actions should be taken to overcome impediments:

- Increase home ownership opportunities for low-moderate income buyers;
- Improve quality and number of affordable rental units to provide choice for low-moderate income renters;
- Improve access to housing opportunities for low-moderate income people.

Barriers cited above included the funds needed to create and subsidize deeply affordable rental housing, and income/rent limits used by federal programs in a high cost housing area. Access to credit for families/individuals disproportionately affected by housing problems needs to be addressed as well.

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

The City will use the HOME down-payment program to provide financing to low income tenants to become homeowners. The program allows a low-moderate income borrower to purchase a unit they can afford anywhere within Stamford. More importantly, in the Stamford housing market, any unit held for a period of time has historically gained value. A family assisted with a down-payment loan is often on the way to building wealth through equity that will enable even greater housing choice with their next purchase. HOME funds will also be used to keep units affordable and safe through rehabilitation and new construction. Funds are made available to private property owners and non-profit developers. The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants for assistance will also be successful in obtaining conventional loans. The City is willing to engage Realtors and banks to stress the need to provide fair and equal access to conventional financing. The City will continue to work with LIHTC projects that by definition provide housing to very low-income persons. For example, HOME funds have recently been used in a transit oriented affordable housing rental property. Meanwhile, we will continue to discuss with HUD the limits provided for maximum purchase price/housing value under HOME in a high cost area. The City will periodically review the Inclusionary Housing Zoning regulation to encourage the creation of housing accessible to individuals and families at a lower income level. During 2020-2021 numerous meetings were held to review the regulation.

Discussion:

The City continues to develop its own source of subsidy for affordable units, primarily through the

Zoning regulation and the Commercial Linkage programs. However, as written, rents for units developed or assisted cannot be considered "deeply affordable." The regulation undergoes periodic updates. The need for a review and opportunity to incentivize the creation of "deeply affordable" units can be considered at that time. During the past year the BOR HCD/SS committee has held a series of meetings with members of the Land Use Bureau and Zoning Board Members to better understand the modifications that could be made to the Zoning regulation.

AP-85 Other Actions – 91.220(k)

Introduction:

The Community Development Office of the City of Stamford continues to be responsible for all CDBG and HOME funded activities. The City, operating within the guidelines for the HOME program set by its Board of Representatives, addresses the needs of the elderly and low-income persons who face severe housing problems. The City maintains relationships with its non-profit housing providers and service agencies to help tenants be successful at keeping their homes.

Actions planned to address obstacles to meeting underserved needs

The main obstacle to meeting underserved needs is the continued reduction of available funds. The Community Development Office provides data and information about funding opportunities to local community agencies to help them secure other public and private sources of funds. We have seen a need to among income qualified elderly homeowners who are counseled on options for financing necessary home repairs, should they wish to remain in place. If properties are 1-4 units, a HOME homeowner rehabilitation loan will be explored. The City has an "open, rolling" application for this type of assistance. The maximum available per unit is \$20,000, however, repairs in these units often exceed the amount of HOME funds available.

Actions planned to foster and maintain affordable housing

The City will continue to work with Charter Oak Communities as it renews its oldest developments. City Capital and Linkage funds are often provided. Applications for CDBG assistance with capital improvements at affordable elderly housing sites are considered favorably. CDBG and HOME funds are provided to maintain the stock of affordable housing. Specifically, funds will be awarded to NHS/NNI Mission Taylor, LLC (Madison Smith Apartments/Belltown Manor) for to renovate areas of low income housing. The City meets regularly with Charter Oak Communities, New Neighborhoods, Inc., Mutual Housing Association, Neighborhood Housing Services, Pacific House and Inspirica to assess the needs to maintain affordable housing. The Housing, Community Development and Social Services Committee of the Board of Representatives will continue to review the City's Inclusionary Housing Zoning Regulation to identify text changes that could encourage the development of a wider range of affordable housing options.

Actions planned to reduce lead-based paint hazards

City programs are enhanced by the services available through its own municipal departments and via its linkages with various community agencies and programs. Using a coordinated system reciprocal referrals and information sharing with Building, Fire, Social Services and Zoning/Land-use, Stamford has built a community network able to address housing related needs. The Health Department services include prenatal and well child care, school and public health nursing, and the Women, Infant, and Children (WIC) nutrition program. As part of the child case management the Environmental Inspections

Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning. The City of Stamford Health Department has knowledgeable staff that can assist with any questions regarding lead. The Health Department Laboratory Division provides finger screening on Mondays and Wednesdays. The Health Department is also responsible for investigating cases of lead poisoned children six years of age and younger with lead levels 10ug/dl or greater. The investigation entails an interview with the family, visual inspection of the premises, and paint chip, soil, and/or dust samples obtained for analysis. If the results indicate lead is present in the home, the owner will be responsible for abating the lead using a certified lead abatement contractor to remove the lead to assure proper removal and clean-up. The local health department sends a reminder test letter to parents/guardians for capillary results 5-9 µg/ dl. The level of concern has now been lowered from 10 µg/dl to 5 µg/dl. The new protocol went into effect on July 1, 2013. Any CDBG and HOME funded projects (residential) in pre-1978 structures are tested for lead-based paint hazards. If lead is present the sub-recipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

Actions planned to reduce the number of poverty-level families

Pacific House, Inc. is funded to assist poverty-level individuals acquire the skills they need to expand their employment opportunities. Inspirica is funded to offer families access to programs to develop skills to rise from poverty. A program to help immigrants obtain the necessary documents to establish them as legal workers is also funded with the intention of empowering and educating immigrants to ensure they are not abused and have the skills to seek employment. Continued counseling and training of those with low income who reside in Charter Oak Communities associated developments will assist these families in increasing their income.

Actions planned to develop institutional structure

The City partners with non-profit and other public agencies to implement the proposed community development plan. The City evaluates each activity, and the agencies and organizations, to assess the strengths and gaps in the delivery system. ODFC is working to create a more efficient way of dealing with the requirements that have grown up around the McKinney programs that fund the homeless shelter associated organizations. The City works with ODFC, Pacific House and Inspirica to achieve a single point of entry into the homeless referral system. The City will continue to work to restructure the Community Development Office. The Community Development Office has a good working relationship with the Social Services Department and Health Department. The HCD/SS Committee will continue to request presentations from Land Use and Zoning as we seek to modify local Zoning to encourage the development of "deeply affordable" housing.

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

As the emphasis on housing the homeless has increased, there has been a natural growth of cooperation between public and private operators of affordable housing to create workable support/counseling for those obtaining transitional and permanent housing. The City supports these efforts, and urges those with newly funded HOME projects to consider establishing relationships with agencies such as Laurel House to assist tenants to become successful in their new housing. Charter Oak Communities has a vibrant partnership with Family Centers, Inc. to connect residents with social services. The City will continue to work with Charter Oak Communities on the Vita Health and Wellness district.

Discussion:

N/A

Program Specific Requirements

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

Introduction:

This section describes the program specific requirements for the CDBG and HOME program.

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.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City will not be using other forms of investment described in 92.205, for example, loan guarantee, refinance or interest subsidies. All assistance to homebuyers or developers are in the

form of secured mortgage loans, with deferred payment. No Tenant Based Rental Assistance will occur.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture/Resale Issues.

The HOME Down-payment Assistance Program provides up to a \$20,000 deferred payment loan at zero percent which is payable upon resale or in 30 years, whichever occurs first. The down payment loan is always a direct subsidy enabling the homebuyer to purchase the property, and the loan is subject to “recapture”, that is repayment in the event of sale or if the buyer does not use the unit as his/her principal residence. When recaptured, the entire loan must be repaid.

The City of Stamford requires that participants in the HOME down payment program execute mortgage deeds that reflect the above: they require HOME units to be the owner’s principal residence for the life of the loan. In addition, the HOME Loan Note and Mortgage require that should they sell the unit, the HOME funds are recaptured via repayment of the loan.

If a down payment loan recipient sells his/her home

- For less than what is owed to all lenders, then the balance of the down payment loan that cannot be met with any sale proceeds is forgiven.
- For more than what is owed to all lenders, then the down payment loan must be paid in full from net proceeds.

Since the HOME loans must be repaid, there is no requirement for resale restrictions. The HUD maximum allowable purchase/home value for existing units now in effect is affecting this program. At \$314,000 for a single unit, the selection of units is poor. Analysis of real estate transactions recorded for the period 10/2015 to 10/2016 indicates only 23% of all transactions were for a sale price of \$313,000 or less.

In 2010 – 11, the City instituted underwriting standards that require HOME down-payment loan recipients to meet a minimum requirement for their housing cost to income ratio.

To the extent possible, HOME down-payment loans may be used on units purchased through the City’s Neighborhood Stabilization Program (NSP). The NSP program shares the goal of creating affordable housing units, by acquiring, rehabilitating and reselling eligible properties to income qualified persons. HOME projects, existing and new, will be monitored for compliance regarding income, rents, and condition as described in the City's Strategic Plan.

The City will not use forms of investment other than those described in 92.205.

For information regarding affirmative marketing and minority outreach, see this Action Plan, Barriers to Affordable Housing section.

HOME projects, existing and new, will be monitored for compliance regarding income, rents, and condition as described in the City's Strategic Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The Stamford Community Development Office received HUD approval of its form of note and mortgage for a HOME Down-payment Loan Program. These documents contain the required recapture provision in event of sale of the unit, or in event of several instances of default (for example, moving from the unit and renting it out). In recapture, the entire loan must be repaid. The Adopt-A-House Program worked with the City to draft the proposed documents which were approved by HUD in 1997. In the event of sale by foreclosure, the owner is required to repay HOME funds only to the extent that net proceeds permit. (Net proceeds are defined in HOME regulations as "the sales price minus superior loan repayment (other than HOME funds) and any closing costs." (92.254(a)(5)(ii)(A)) If voluntary short sale is proposed by the owner of a HOME assisted unit, the City may approve the short sale or may exercise its right of first refusal and arrange a purchase by a HOME qualified buyer at a market price. This will assure that the unit will remain affordable. Otherwise, with recapture of funds, money is used to make additional HOME qualifying "down-payments".

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

This will not be done.

N/A

Appendix - Alternate/Local Data Sources

1	Data Source Name 2006-2010 ACS, 2014-2018 ACS
	List the name of the organization or individual who originated the data set. US Census Bureau
	Provide a brief summary of the data set. The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the Census website, which provides data about the United States, Puerto Rico and the Island Areas.
	What was the purpose for developing this data set? Information from the ACS help determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Stamford, CT
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2006-2010 ACS, 2014-2018 ACS 5-Year Estimates
	What is the status of the data set (complete, in progress, or planned)? Complete
2	Data Source Name 2012-2016 CHAS
	List the name of the organization or individual who originated the data set. US Census Bureau, American Community Survey (ACS) and U.S. Department of Housing and Urban Development (HUD)

	<p>Provide a brief summary of the data set.</p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households.</p>
	<p>What was the purpose for developing this data set?</p> <p>The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford, CT</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2012-2016 CHAS</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
3	<p>Data Source Name</p> <p>2014-2018 ACS 5-Yr Estimates</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>US Census Bureau</p>
	<p>Provide a brief summary of the data set.</p> <p>The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the Census website, which provides data about the United States, Puerto Rico and the Island Areas.</p>
	<p>What was the purpose for developing this data set?</p> <p>Information from the ACS help determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford, CT</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2014-2018 ACS 5-Year Estimates</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>

4	Data Source Name 2013-2017 ACS (Workers), 2017 LEHD (Jobs)
	List the name of the organization or individual who originated the data set. 2013-2017 ACS and 2017 Longitudinal Employee-Household Dynamics: United States Census Bureau
	Provide a brief summary of the data set. The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the Census website, which provides data about the United States, Puerto Rico and the Island Areas. The Longitudinal Employer-Household Dynamics (LEHD) program is part of the Center for Economic Studies at the U.S. Census Bureau. The LEHD program produces new, cost effective, public-use information combining federal, state and Census Bureau data on employers and employees under the Local Employment Dynamics (LED) Partnership.
	What was the purpose for developing this data set? ACS: Information from the ACS help determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs. LEHD: Information from the LEHD help state and local authorities who increasingly need detailed local information about their economies to make informed decisions. The LEHD Partnership works to fill critical data gaps and provide indicators needed by state and local authorities. LEHD's mission is to provide new dynamic information on workers, employers, and jobs with state-of-the-art confidentiality protections and no additional data collection burden.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Stamford, CT
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2013-2017 ACS (Workers), 2017 LEHD (Jobs)
	What is the status of the data set (complete, in progress, or planned)? Complete
5	Data Source Name HUD 2019 FMR and HOME Rents
	List the name of the organization or individual who originated the data set. US Department of Housing and Urban Development (HUD)

	<p>Provide a brief summary of the data set.</p> <p>Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.</p> <p>HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are set to determine the rent in HOME-assisted rental units and are applicable to new HOME leases.</p>
	<p>What was the purpose for developing this data set?</p> <p>Fair Market Rents (FMRs) are used to determine payment standard amounts for HUD Programs. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford, CT</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
6	<p>Data Source Name</p> <p>PIC (PIH Information Center)</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>US Department of Housing and Urban Development (HUD)</p>
	<p>Provide a brief summary of the data set.</p> <p>IMS/PIC is responsible for maintaining and gathering data about all of PIH's inventories of HAs, Developments, Buildings, Units, HA Officials, HUD Offices and Field Staff and IMS/PIC Users.</p>
	<p>What was the purpose for developing this data set?</p> <p>IMS/PIC is responsible for maintaining and gathering data about all of PIH's inventories of HAs, Developments, Buildings, Units, HA Officials, HUD Offices and Field Staff and IMS/PIC Users.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford, CT</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2019</p>

	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
7	<p>Data Source Name</p> <p>CT 2019 PIT Count 2019 Stamford</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Connecticut Coalition to End Homelessness</p>
	<p>Provide a brief summary of the data set.</p> <p>A point-in-time count of the homeless population.</p>
	<p>What was the purpose for developing this data set?</p> <p>To identify the number of homeless individuals in the region and the resources available to them.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford-Greenwich</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>January 22, 2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
8	<p>Data Source Name</p> <p>Bureau of Labor Statistics</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Bureau of Labor Statistics (BLS)</p>
	<p>Provide a brief summary of the data set.</p> <p>BLS unemployment rates are from the BLS Local Area Unemployment Statistics (LAUS). This program produces monthly and annual employment, unemployment, and labor force data for Census regions and divisions, States, counties, metropolitan areas, and many cities, by place of residence.</p>
	<p>What was the purpose for developing this data set?</p> <p>The purpose of the BLS data is to collect, analyze, and disseminate essential economic information to support public and private decision making.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Stamford, CT</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>

	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
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PRELIMINARY OVERVIEW OF THE AFFH EQUITY PLAN

National Low Income Housing Coalition

Ed Gramlich

February 8, 2023, Revised March 1

All page numbers refer to HUD's [preview version](#) of the proposed AFFH rule

§5.154 The Equity Plan

(a) General Provisions (page 172)

- (1) Program participants **must develop an “Equity Plan”** to overcome local fair housing “issues” (defined on page 163) by **conducting an analysis** that **identifies fair housing issues** in their “geographic area of analysis” (confusingly defined on page 164). That analysis must also identify the circumstances and factors that cause, increase, contribute to, maintain, or perpetuate those fair housing issues.

(Program participants are jurisdictions – states, cities, and counties required to submit a Consolidated Plan, “ConPlan” – and public housing agencies, PHAs.)

The analysis must be informed by community engagement (see §5.158 on page 199 and *Memo, 2/13*), HUD-provided data, and local data and local knowledge (page 167). NLIHC has a separate brief about community engagement.

- (2) After engaging the community, program participants must **prioritize** the identified fair housing issues (discussed on page 189) in order to set one or more fair housing goals (see next item).

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- (3) Program participants must then **establish** one or more fair housing “**goals**” (defined on page 162 and further discussed on page 190) to overcome the prioritized fair housing issues – for each fair housing “goal category” (defined on page 163 and listed under “Scope of Analysis” on page 175).
- (4) Equity Plans must be **submitted** (page 204) to HUD for review (page 211).
- (5) After HUD “accepts” an Equity Plan (page 212), a program participant must **incorporate** (page 197) the Equity Plan’s fair housing goals, strategies, and actions necessary to implement the goals into its Consolidated Plan (ConPlan), Annual Action Plans of the ConPlan, or public housing agency (PHA) PHA Plan. (See outline of §5.156 about “incorporate” on page 8 of this outline.)
- (6) Program participants must submit an **Annual Progress Evaluation** (page 194) to HUD describing progress toward achieving each fair housing goal.

All program participants must submit an Equity Plan at least **every five years**.

This provision is at §5.160 Submission Requirements, subsection (h) Frequency (page 210).

(c) Content of the Equity Plan

(2) Fair Housing Goals

A program participant’s Equity Plan must include its fair housing goals, including strategies and meaningful actions – all of which must be incorporated (see page 197 and page 8 of this outline) into the program participant’s ConPlans, Annual Action Plans, PHA Plans, and community plans, including but not limited to, education, transportation, or environment and climate related plans. There is much more on fair housing goals on page 190.

(3) List of Fair Housing Goal Categories

An Equity Plan’s identification of fair housing issues and goals must address, at a minimum, the following seven fair housing goal categories, which HUD considers to be the core areas of the AFFH analysis:

- (i) Segregation and integration (defined on pages 170 and 166);
- (ii) Racially or ethnically concentrated areas of poverty, R/ECAPs, (not well-defined);
- (iii) Disparities in access to opportunity;
- (iv) Inequitable access to affordable housing and homeownership opportunities (“affordable housing opportunities” defined on page 157);
- (v) Laws, ordinances, policies, practices, and procedures that impede the provision of affordable housing in well-resourced areas of opportunity, including housing that is accessible for people with disabilities;
- (vi) Inequitable distribution of local resources, which may include municipal services, emergency services, community-based supportive services, and investments in infrastructure; and
- (vii) Discrimination or violations of civil rights law or regulations related to housing or access to community assets based on race, color, national origin, religion, sex, familial status, and disability (the Fair Housing Act’s “protected classes”).

(4) Conducting the Analysis

Program participants must evaluate a jurisdiction’s local policies and practices impacting fair housing in order to determine whether changes are necessary.

(d) Content Analysis for Local Governments, States, and Insular Areas

At minimum, using HUD-provided data, local data, and local knowledge, including information obtained through community engagement, the Equity Plan must respond to questions based on the seven fair housing goal categories. Program participants must answer the questions as they relate to a program participant’s jurisdiction and region. There are 31 questions plus 28 subquestions. Notably, five of the seven ask, “What public or private policies or practices, demographic shifts, economic trends, or other factors may have caused or contributed to the patterns described above?” The seventh fair housing goal category (page 181) has five subquestions focusing on local and state policies such as zoning and land use laws and source of income ordinances. NLIHC encourages residents and advocates to become familiar with all 31 questions and 28 subquestions.

[It is interesting to note that paragraph (5)(ii),(iii), and (iv) regarding access to affordable housing opportunities (page 179) asks jurisdictions to describe housing cost burden and severe cost burden, housing quality, and housing instability due to rising rents, loss of existing affordable housing, displacement, eviction, source of income discrimination, or code enforcement (page 180). As NLIHC has commented elsewhere, we will urge HUD to define “affordable housing” in the final rule; the proposed rule does not even though it defines “affordable housing opportunities” and uses the term “affordable housing throughout. NLIHC will urge HUD to define “affordable housing” as housing that requires a household to spend no more than 30% of its adjusted income on housing expenses (rent or mortgage payments) and utilities. This definition is known as the “Brooke Rule.”]

[NLIHC will seek clarity regarding the seeming inconsistent use of the use of the terms, region, geographic area of analysis, and geographic area. In addition, there should be guidance regarding use of the words “significant”, “substantial”, “substandard housing conditions”, and “disproportionately”.]

(e) Content Analysis for PHAs

PHAs must include in their Equity Plan, an analysis of the area in which the PHA operates and the PHA’s programs. Using HUD-provided data, local data, and local knowledge, including information obtained through community engagement, the Equity Plan must respond to questions based on five of the seven fair housing goal categories. PHAs must answer the questions as they relate to a PHA’s service area and region. There are 21 questions plus 30 subquestions. For PHAs, the goal categories merge “access to community access” and “access to affordable housing opportunities”, eliminating “access to homeownership and economic opportunity”. NLIHC encourages residents and advocates to become familiar with all 21 questions and 30 subquestions.

[It is interesting to note that on page 184 paragraph (3)(ii)(B) asks PHAs to describe conditions in R/ECAPs that limit access to opportunity, such as housing cost burden, housing quality, housing instability, displacement, source of income discrimination, and eviction risk.]

Paragraph (5) asks about local policies and practices impacting fair housing (starting on page 187). Among topics covered are siting of affordable housing and use of Housing Choice Vouchers in well-resourced areas, a PHA's mobility and portability policies and activities, payment standards and fair market rents. It also asks what specific steps a PHA is taking toward affirmatively furthering fair housing with regard to its discretionary policies such, admissions preferences, voucher portability, reasonable accommodations for people with a disability, and evictions (page 189).]

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(f) Description and Prioritization of Fair Housing Issues

- (1) An Equity Plan must include a description of the fair housing issues identified during the analysis carried out for each of the fair housing goal categories. The description of a fair housing issue must include its specific condition and the protected class(es) that are adversely affected by the issue.

Program participants are expected to identify all fair housing issues and identify the fair housing issues that are the greatest barriers to fair housing choice and deny equitable access to community assets.

- (2) To establish an Equity Plan's fair housing goals, program participants must prioritize the fair housing issues in each fair housing goal category, giving consideration to fair housing issues faced by "underserved communities" historically. In determining how to prioritize fair housing issues within each fair housing goal category, program participants must give highest priority to fair housing issues that will result in the most effective fair housing goals for achieving material positive change for underserved communities.

HUD defines "underserved communities" (page 171) as protected class members with a particular characteristic, such as households experiencing homelessness, LGBTQ+ persons, domestic violence survivors, and people with criminal records.

(g) Fair Housing Goals

- (1) The Equity Plan must include fair housing goals that are designed and can be reasonably expected to overcome the fair housing issues identified through the analysis. While HUD expects progress toward achieving each goal by the time a program participant's next Equity Plan is due, HUD recognizes that all goals may not be fully achieved during a single five-year cycle.
- (2) Fair housing goals, when taken together, must be designed to overcome prioritized fair housing issues in each fair housing goal category and must be designed and reasonably expected to result in material positive change and be consistent with a balanced approach. Examples of potential goals are presented through paragraph (3), page 191-193, including: siting future affordable housing outside of segregated areas; expanding mobility programs; reducing land use and zoning restrictions; removing nuisance or crime-free ordinances; enacting and enforcing source of income laws; enhancing housing accessibility features for people with disabilities; enacting protections for LGBTQ+ people; and revising PHA eviction, admissions, and prior criminal records policies.

- (5) Fair housing goals must not require residents of racially or ethnically concentrated areas of poverty to move away from those areas if they prefer to stay as a matter of fair housing choice.
- (6) Fair housing goals must:
 - Identify the fair housing issue(s) the goal is designed to address;
 - Explain how the goal, alone or along with other goals, will overcome the fair housing issue(s) it is designed to address;
 - Set timeframes for achieving the goal, including metrics and milestones; and
 - Describe the specific steps or actions needed to achieve the goal and the amount of funding needed to achieve the goal.

(h) Additional Content (Community Engagement oriented)

This short subsection lists items a program participant must include as part of its Equity Plan:

- (i) Summary of community engagement activities;
- (ii) Description of how comments received through community engagement were addressed;
- (iii) Attachment of all written comments received and transcripts or audio or video of "hearings" held during the development of the Equity Plan. [NLIHC will ask HUD add "meetings" as well as "hearings".]

(i) Progress Evaluation

- (1) Program participants “should” engage in continual evaluation of their progress, but must do so at least once per year, to determine whether any changes, adjustments, or new information requires a revision to the Equity Plan or a subsequent ConPlan, Annual Action Plan, or PHA Plan.
- (2) Program participants must conduct and submit Annual Progress Evaluations to HUD. It must include a report on progress achieved under each fair housing goal, including whether goals have been fully achieved, and an assessment of whether the Equity Plan’s fair housing goals need to be adjusted because of changed circumstances or because the goals are unlikely to result in material positive change in overcoming fair housing issues. The Annual Progress Evaluation must be published on HUD-maintained webpages.

[NLIHC will urge HUD to require program participants to post their Annual Progress Evaluations on an easily identifiable webpage of their website.]

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- (3) After the first Equity Plan, a program participant must provide a summary of the progress it achieved in meeting the prior Equity Plan’s fair housing goals and include this summary in the next Equity Plan. This summary of past progress is distinct from the required Annual Progress Evaluation that must be in the “next Equity Plan,” but may include a compilation of prior progress evaluation summaries.
- (4) Annual Progress Evaluations *and* summaries must include:
 - (i) Progress on each goal set in the prior Equity Plan, including whether the goal was achieved, or some progress was made, or no progress was made;
 - (ii) Identification of barriers to making progress;
 - (iii) A description of any changes or adjustments made during the prior Equity Plan and how those changes impacted progress;
 - (iv) A description of HUD funds or other federal, state, local or charitable funds were used with the aim of achieving a goal;

(j) Publication

Equity Plans, Annual Progress Evaluations, and HUD notifications related to Equity Plans shall be public documents.

[NLIHC will urge HUD to require program participants to post their draft Equity Plans, submitted Equity Plans, and Annual Progress Evaluations on an easily identified webpage of their website. HUD merely “encourages” program participants to post only their HUD-reviewed Equity Plans on their own websites.]

- (1) Program participants must make draft Equity Plans available following the community engagement section of this regulation (§ 5.158).
- (2) Once a program participant submits an Equity Plan, HUD will post it on a HUD-maintained webpage. HUD will update the webpage to reflect the status of an Equity Plan, reflecting whether an Equity Plan has been “accepted”, and if it has been accepted whether it differs from the initially submitted Equity Plan.

- (3) HUD will accept information from the public during its review of a submitted Equity Plan, consistent with § 5.162 [HUD Review section, page 211], relating to whether:
 - The Equity Plan was developed following the required community engagement provisions of this regulation (§ 5.158);
 - The content of a published Equity Plan is deficient, including whether fair housing issues were appropriately identified,
 - The information provided during the community engagement process was appropriately incorporated into the Equity Plan;
 - Fair housing issues were appropriately prioritized; and
 - The fair housing goals are appropriate, meaning that they are designed and can be reasonably expected to overcome the effects of the identified fair housing issues.

§5.156 Incorporating Equity Plan Goals, Strategies, and Actions in ConPlans and PHA Plans

(a) General.

HUD's policy is to ensure that program **funding** is used to eliminate disparities resulting from federal, state, and local laws, policies, and practices that have perpetuated segregation or denied equal opportunity because of a protected characteristic. Therefore, any policies or practices adopted through a program participant's planning documents [e.g. ConPlan or PHA Plan] or due to its implementation of programs, activities, and services, must be consistent with the commitments it made in its Equity Plan and the AFFH mandate.

By incorporating its fair housing goals, strategies, and actions into its planning documents, a program participant will be better positioned to build equity and fairness into its decision-making processes for the use of resources and other investments, live up to the commitments in its Equity Plan, and fulfill its obligation to affirmatively further fair housing.

A program participant must incorporate its implementation of these concepts and commitments in its Equity Plan into planning documents, such as its ConPlan or PHA Plan, and their respective Annual Action Plans, or any disaster plan.

(b) Strategies and meaningful actions.

To implement an Equity Plan's fair housing goals, a program participant must include strategies and meaningful actions in its ConPlan or PHA Plan and their respective Annual Action Plans.

A program participant is only required to include implementation of fair housing goals intended to be undertaken or **funded** in a particular Annual Action Plan program year; however, all fair housing goals must be incorporated in a Five-Year ConPlan or PHA Plan.

Strategies and meaningful actions must affirmatively further fair housing and identify **specific expected allocation of funds** by program year for the use of HUD and other funds to implement each fair housing goal (if funding is necessary).

Strategies and meaningful actions may include, but are not limited to:

- Elimination of local laws or ordinances that are barriers to equitable access to homeownership or other affordable housing opportunities;
- Enactment of local laws or ordinances that remove barriers or increase access to homeownership or other affordable housing opportunities;
- Build strong fair housing and civil rights protections into state and local laws;
- Enhance mobility strategies and encouraging development of new affordable housing in well-resourced areas of opportunity; and
- Place-based strategies and meaningful actions that are a part of a balanced approach, including preservation of existing HUD-assisted and other affordable housing.

(c) Other planning activities or processes.

A program participant must incorporate its Equity Plan fair housing goals into planning documents required in connection with the receipt of federal financial assistance from any other federal executive department or agency [for example, the U.S. Department of Agriculture's (USDA's) Rural Development (RD) housing programs, or the Department of Transportation's Transit-Oriented Development grants].

This incorporation shall include the **allocation of resources** necessary to achieve a fair housing goal.

A program participant's Annual Progress Evaluation includes an evaluation of the fair housing goals incorporated into the other planning documents.

(e) Failure to incorporate fair housing goals into planning documents.

A program participant must incorporate its Equity Plan fair housing goals into its ConPlan or PHA Plan in order to **allocate funding** to implement those goals as strategies and meaningful actions.

If HUD determines that Equity Plan fair housing goals have not been incorporated into ConPlans or PHA Plans, and after notifying a program participant and providing it with an opportunity to respond and cure any deficiency, the HUD Secretary may condition a grant, obtain an assurance that the program participant will revise the ConPlan or PHA Plan to comply with the AFFH regulations by a specified date, or may disapprove a ConPlan or reject a PHA Plan, or may take actions set forth at §§ 5.170 and 5.172 (pages 229-232).

[NLIHC notes that it is a positive feature that funding is mentioned from the very beginning and consistently in each of the subsections. It is not sufficient for a ConPlan (for example) to state that a program is a high priority. The "value" of that priority is often "weighed" by the amount of federal and other resources actually devoted to a program or activity. ConPlans really are all about how elected officials make decisions regarding HUD funding, especially Community Development Block Grant (CDBG) funds each year.]

ConPlan and PHA Plan Regulations Text Incorporating Equity Plan Goals, Strategies, and Actions

ConPlan Regs

Local Governments (Page 250)

§91.215(a)(5) Strategic Plan

(i) Describe how the priorities and specific objectives of the jurisdiction under paragraph (a)(4) of this section will affirmatively further fair housing by setting forth fair housing strategies and meaningful actions consistent with the fair housing goals and other elements of the Equity Plan.

[§91.215(a)(4) requires the local government to summarize the ConPlan priorities and specific objectives it intends to start and/or complete during the time period covered by the Strategic Plan and how funds that are reasonably expected to be available will be used to address identified housing and community development needs.]

(ii) For any fair housing goals from the Equity Plan not addressed by the Strategic Plan’s priorities and objectives, identify how these goals have been incorporated into the Strategic Plan consistent with the requirements of § 5.156 [the “incorporation” provision].

§91.220 Annual Action Plan (Page 251) The Annual Action Plan must include...

(k)(1) Affirmatively furthering fair housing. Actions the jurisdiction plans to take during the next year to implement the fair housing goals established in the Equity Plan or other actions to address fair housing issues consistent with the jurisdiction’s obligation to affirmatively further fair housing.

(l) Program-Specific Requirements

- (1) CDBG (iv)The information about [CDBG] activities shall also include whether the activities are for purposes of implementing any fair housing goals from the Equity Plan.

States (Page 254)

§91.315(a)(5) Strategic Plan

(i) Describe how the priorities and specific objectives of the state under paragraph (a)(4) of this section will affirmatively further fair housing by setting forth fair housing strategies and meaningful actions consistent with the fair housing goals and other elements of the Equity Plan. [§91.215(a)(4) requires the local government to summarize the ConPlan priorities and specific objectives it intends to start and/or complete during the time period covered by the Strategic Plan and how funds that are reasonably expected to be available will be used to address identified housing and community development needs.]

(ii) For any fair housing goals from the Equity Plan not addressed by the Strategic Plan’s priorities and objectives, identify how these goals have been incorporated into the Strategic Plan consistent with the requirements of § 5.156 [the “incorporation” provision].

§91.320 Annual Action Plan The Annual Action Plan must include...

(j)(1) Affirmatively furthering fair housing. Actions it plans to take during the next year to implement the fair housing goals established in the Equity Plan or other actions to address fair housing issues consistent with the jurisdiction’s obligation to affirmatively further fair housing.

PHA Plan Regs

§903.4 What Are Public Housing Agency Plans?

(a)(3) The plans described in this section include the incorporation of the fair housing goals established in the PHA's Equity Plan.

§903.6 What Information Must a PHA Provide in the Five-Year Plan?

(a) * * *

(4) The PHA's fair housing strategies and meaningful actions it intends to undertake in order to implement the fair housing goals incorporated from the PHA's Equity Plan.

(b) * * *

(2) The progress the PHA has made in meeting the goals and objectives described in the PHA's previous 5-Year Plan. For purposes of this requirement as it relates to the PHA's fair housing goals, the PHA may rely on the progress evaluations required for purposes of the Equity Plan.

§903.7 What Information Must a PHA Provide in the Annual Plan?

(o) Civil Rights Certification.

(2) The PHA shall demonstrate compliance with the certification requirement to affirmatively further fair housing by fulfilling the requirements of this paragraph (o) by engaging in the following:

(iii) Specifies fair housing strategies and meaningful actions to address fair housing issues and implement fair housing goals established in the PHA's Equity Plan;

(vi) Complies with the community engagement requirements set forth at § 5.158 of the AFFH regulations for purposes of developing the PHA's Equity Plan and the incorporation of the Equity Plan's fair housing goals pursuant to § 5.156 of this title;

§903.17 What Is the Process for Obtaining Public Comment on the Plans?

(a) For purposes of the incorporation of the Equity Plan required by § 5.156 of this title, the community engagement requirements of § 5.158 shall apply.

(b) For purposes of the PHA's 5-Year Plan and Annual Plan, and notwithstanding the requirements set forth at § 5.158 of this title for purposes of the Equity Plan's incorporation into such plans pursuant to § 5.156 of this title, not later than 45 days before the public hearing is to take place, the PHA must:

(c) PHAs shall conduct reasonable outreach activities to encourage broad public participation in the PHA plans. This outreach is for purposes of the 5-Year Plan and Annual Plan. The requirements of § 5.158 of this title shall apply for purposes of the Equity Plan.

§903.19 When Is The Five-Year Plan or Annual Action Plan Ready for Submission to HUD?

(d) The PHA has incorporated the fair housing goals from its Equity Plan pursuant to § 5.156 of this title.

§5.164 Revising an Accepted Equity Plan Pages 218-219

(a) General—Circumstances for revising an Equity Plan.

- (1) An Equity Plan previously accepted by HUD must be revised and submitted to HUD for review under if:
 - (i) A material change occurs. That is, there is a change in circumstances to the extent that an Equity Plan’s analysis and fair housing goals no longer reflect actual circumstances.

In addition, an Equity Plan must be revised if there is a Presidentially declared disaster that impacts a program participant’s jurisdiction and is expected to result in additional federal financial assistance under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act; or

- (ii) HUD writes a program participant, specifying a material change that requires a revision.
- (2) An Equity Plan previously accepted by HUD may be revised and submitted to HUD for review if:
 - (i) There are changes in a program participant’s geographic area of analysis that significantly impact the steps it needs to take to affirmatively further fair housing;
 - (ii) A fair housing goal in an Equity Plan cannot be achieved;
 - (iii) Significant demographic changes occur;
 - (iv) New fair housing issues emerge;
 - (v) Short-term fair housing goals have been achieved;
 - (vi) Civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders are entered; or
 - (vii) A program participant tells HUD about a change that may merit submission of a revised Equity Plan and HUD grants permission to submit a revised Equity Plan by a specific date for HUD review

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(3) Requirements for Revisions of an Equity Plan.

An Equity Plan revision consists of preparing any necessary amended analyses and fair housing goals that take into account the change, including any new fair housing issues. A revision might not necessarily require submitting an entirely new Equity Plan; a program participant may focus only on the change and the appropriate and necessary adjustments to the analysis and fair housing goals. Any revision shall trigger the program participant’s obligation to conduct community engagement on the amended portions of the Equity Plan following the community engagement provisions at § 5.158 (page 199 and see NLIHC’s “Preliminary Overview of AFFH Community Engagement and Complaint Processes”).

(b) Timeframe for required revisions.

- (1) If a revision to the Equity Plan is necessary due to a material change, it must be submitted within 12 months of the onset of the material change, or at a later date if provided by HUD.

[Should non-regulatory HUD guidance offer examples of other types of material change such as when substantial, one-time infusions of funds are provided such as the ARPA State and Local Fiscal Recovery Funds or to the Infrastructure Improvement Act?]

If the material change is the result of a Presidentially declared disaster, the submission deadline is automatically extended to two years after the date of the disaster declaration. HUD may extend this deadline, upon request, for good cause.

[Should the revision be timed to align with a jurisdiction's Disaster Plan?]

(2)

- (i) If a revision is required because HUD specifies a material change that requires a revision, HUD will specify a date for a program participant to submit a revised Equity Plan. HUD may extend the due date if requested.
- (ii) Within 30 calendar days after HUD notifies a program participant that it must revise its Equity Plan, a program participant may write to HUD providing specific reasons why a revised Equity Plan is not necessary. HUD will consider a program participant's reasons and issue a written determination.

(c) Submission of the revised Equity Plan.

Any Equity Plan revisions must be submitted to HUD and will be posted on a HUD-maintained website and will be reviewed by HUD.

(d) Incorporation of revised fair housing goals into subsequent planning documents.

Once HUD accepts a revised Equity Plan, within 12 months a program participant must incorporate any revised fair housing goals into its ConPlan, Annual Action Plan, or PHA Plan.