



**State of Connecticut
2011
Neighborhood Stabilization Program 3
Action Plan Substantial Amendment
(NSP3)**



Submitted to the
U.S. Department of Housing and Urban Development

By
State of Connecticut
Department of Economic and Community Development

Governor Dannel P. Malloy

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Neighborhood Stabilization Program 3 (NSP3)
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A. AREAS OF GREATEST NEED

A primary tenet of Neighborhood Stabilization Program 3 (NSP3) is the need to focus the investment of NSP3 funds into areas with significant foreclosure activity that will also leverage other on-going or planned investment activity which will further stabilize these neighborhoods. These other types of activities run the gamut from other affordable housing development, to child care, employment opportunities, education, transportation, business development, infrastructure improvements, public facility improvement, social and supportive services, as well as other types of investments. HUD has encouraged grant recipients to carry out its NSP3 activities in the context of a comprehensive plan to make neighborhoods not only more stable, but also more sustainable, inclusive, competitive and integrated into the overall fabric of the community. It is the state's intention to focus the investment of these very limited NSP3 funds in just such a fashion.

Based on the HUD Needs Score available through HUD's online NSP Mapping Tool, there are 524 eligible areas of greatest need in Connecticut that meet or exceed the minimum need score established by HUD; for an area to be considered as having a significant need, it must have a cumulative need score of not less than 16 on the HUD scale. Of these 524 eligible areas, 481 are in federal community development block grant entitlement communities and 412 of these are in the ten (10) communities selected to participate in the original Neighborhood Stabilization Program (NSP1). Appendix A provides a Data Dictionary and a subset of the HUD Needs data, limited to these 412 areas.

Again, looking at the HUD data, there are 404 eligible areas of greatest need with a score of 17 or greater, and of these, 360 are in the ten (10) communities selected to participate in the original Neighborhood Stabilization Program (NSP1). Clearly, a focus on these ten (10) communities would address a large portion of the foreclosure issues in Connecticut. A set of needs maps which incorporates these areas of greatest need was created using the HUD Mapping Tool, as required. These eligible areas will be used to determine the actual micro-target areas consistent with the requirements of NSP3 and based on the distribution of funds. DECD will hold an application process for the proposed sub-recipients as identified in section B beginning in February 2011. Once sub-recipient micro-target areas are chosen based on input from the local level, additional NSP mapping information will be submitted as a supplement to this Substantial Amendment.

For many of these communities, a majority of these areas of greatest need are contiguous. This has a compounding effect on a neighborhood, and the community as a whole. It is important to address needs across these areas of continuity in order to protect them from additional economic stress and promote neighborhood stability. It is DECD's intention to prioritize the use of the NSP3 funds in these areas, consistent with the other priorities required under NSP3.

Current Connecticut Housing Market

Similar to the preferences under NSP1, states are encouraged to use local data to justify their funding decisions beyond the HUD data. DECD, with significant cooperation and assistance from CHFA, has been able to look at other data sources on related datasets in order to further substantiate the funding decisions in this substantial amendment. This data included lis pendens filings and foreclosure deed filings, as well as other relevant data down to the municipal level. DECD looked at and analyzed the relative rates of change in these datasets from 2009 to 2010 as well as the relative rankings of the various communities in order to verify the findings identified in the HUD data.

To be specific, DECD looked at the following: the number of lis pendens filings from 1/10 to 9/10 and 1/09 to 9/09; the number and rate of lis pendens filings for the same periods as a percent of owner-occupied housing units; the number and rate of foreclosure deeds filed 1/10 to 9/10 and 1/09 to 9/09; the number of foreclosure deeds filed for the same periods as a percent of owner-occupied housing. In addition, the data reviewed as part of NSP1 was reviewed to verify the subprime loan and foreclosure data in comparison to this updated information. In reviewing the statewide data sources, DECD found that, although the relative order of these communities is not exact, the top four communities identified by both HUD and the data provided by the Connecticut Housing Finance Authority (CHFA) are those with the greatest need. These communities are Bridgeport, Hartford, New Haven and Waterbury. This information is attached as Addendum E.

These communities were direct recipients of NSP3 funds from HUD, but because of the limited funding available, the complexity of the administrative obligations of those funds, the existing infrastructure and working relationship between these communities and the state as a result of NSP1, these communities will enter into a cooperation agreement with DECD to administer all of their direct allocations of NSP3 funds. This is consistent with the provisions of the HUD notice on NSP3.

Through these joint agreements, DECD has agreed to allocate, at a minimum, the same funds that these four communities would have otherwise received directly, less a minimal administrative cost. Please refer to Section B. Distribution and Uses of Funds for details on these and the remaining NSP3 allocations.

These four communities have had and continue to have both significant need and local capacity for the implementation and use of these funds to address the needs of their neighborhoods. Additional analysis of both the HUD data and local data indicates that four other communities that participated successfully in NSP1 also have significantly high rates of both lis pendens and foreclosure deed filings and these communities are: Stamford, Meriden, New Britain and Danbury. As a matter of fact, the eight communities DECD has discussed so far represent eight of the top nine communities based on the rates of filings of these two datasets. They consistently rank highly in most of the other categories reviewed. These last four communities also have high need areas based on the HUD NSP Mapping Tool, as discussed earlier in this section; HUD Needs Scores of 16 or greater.

However, when DECD reviewed this data from a geographic distribution standpoint, a significant section of the state is overlooked; the southeast corner. Two highly successful participants from NSP1, located in the southeast corner of Connecticut, have a significant number of eligible need areas using the HUD Mapping Tool; these communities are Norwich and New London. These two communities clearly have a significant need, and are the

central urban districts for this portion of the state. A comparison with other communities in the more urban areas of the state does not emphasize the communities of Norwich and New London. However, if we look at these communities as urban hubs for their region, they are clearly bearing the brunt of the foreclosure burden. Again, Norwich and New London were highly successful under NSP1, and have the necessary systems, processes and procedures in place to ensure the successful implementation of any additional NSP funds which may be distributed to this area.

B. DISTRIBUTION AND USES OF FUNDS

State Distribution of Funds

Based on the cooperation agreement with the four neediest cities (Bridgeport, Hartford, New Haven and Waterbury), the data analysis in the previous section, the documented and concentrated need in these areas, the geographic impact of the distribution of these funds, as well as the complexity of program establishment and implementation, DECD has determined that awards will be limited to those ten (10) communities participating in NSP1 and cited in the above paragraphs.

As noted in Section A above and in compliance with [75 FR 64322](#), the State of Connecticut, acting through DECD has determined the areas of greatest need, see Appendix A. Although much of the data continues to change, these communities continue to be those with the greatest percentage of home foreclosures (sub-prime), with the highest percentage of homes financed by a sub-prime mortgage-related loan and those areas which are likely to face a significant rise in the rate of home foreclosures.

Thus the communities identified as having the greatest need, sufficient capacity and ranked highly based on the data analysis are the following ten (10) communities:

Town	2000 Number of Owner-Occupied Housing Units	Number of Foreclosure Deeds (Jan. 2010 – Sept. 2010)	Number of Foreclosure Deeds as a Percent of Owner-Occupied Housing Units
Waterbury	20,291	482	2.38%
Bridgeport	21,755	450	2.07%
New Haven	13,927	296	2.13%
Hartford	11,064	189	1.71%
Meriden	13,743	163	1.19%
New Britain	12,191	137	1.12%
Danbury	15,849	127	0.80%
Norwich	7,924	114	1.44%
Stamford	25,719	91	0.35%
New London	3,861	54	1.40%

As authorized under NSP1, the federal regulations for NSP3 allow any state grantee to use its NSP3 grant to carry out program activities directly (e.g. hire staff, procure contractors, etc.) as well as retain and re-use the program income. This authorization includes joint applications, as is being proposed herein. The DECD has determined that the most appropriate way to use these limited resources is as follows:

1. Those communities that have entered into a cooperation agreement with the state, shall receive a direct allocation grant value equivalent to the allocation they would have received directly from HUD, less a 2% administrative fee, through the existing subrecipient methodology.
2. Those communities that have entered into a cooperation agreement with the state shall receive an additional \$400,000 direct allocation of grant funds, less a 5% administrative fee for the state, from the state's direct HUD NSP3 grant of \$5,000,000, again through the original subrecipient methodology.
3. The remaining funds will be equally distributed to the four (4) communities with the greatest need; Bridgeport, Hartford, New Haven and Waterbury. These funds will be targeted to address affordable rental or homeownership units of families at or below 50% of AMI in an eligible target area.

Applications will be solicited from all 10 proposed NSP3 sub-recipients to assure that the proposed plans and target areas comply with NSP rules and DECD priorities. This application is available for review on DECD's website at www.decd.org.

All of the target areas identified as eligible for consideration have needs scores of at least 16, and emphasis will be given to project areas proposed that have a needs score of 17 or 18. In addition to targeting rental housing and homeownership serving 50% of AMI, preference will be given to applications that demonstrate other housing, community development or economic development activity has occurred in the last year, or will occur in the next 18 months within the target area. As an example, a significant number of eligible areas fall within the transportation corridor between New Haven-Hartford-Springfield, which was recently awarded a \$4.2 million planning grant under the Sustainable Communities Grant. Applications which fall within an eligible target area and in reasonable proximity to this transportation corridor would receive additional consideration when this funding decision is being made. DECD will also prioritize micro target areas to assure compliance with the NSP3 goal that 20% of the REOs in a target area are addressed through the NSP3 program.

It is DECD's intention to utilize the full 10% allocation available for administrative expenses, to be shared by DECD and its subrecipients, both the direct allocation grants and the competitive allocation grants, as described above and detailed in the following section.

Resource Plan

Connecticut's Joint NSP3 Allocation -	\$ 9,322,756
Less Administration (10%) -	(932,276)
Available for Eligible Activities -	\$ 8,390,480

As NSP3 allows up to 10% to be set-aside for administrative costs, the State intends to use all 10% for administrative costs of DECD or its subrecipients, as further described in the chart below.

	Federal Allocation	Allocation from State \$5M	Admin to City	Admin to State	Program Cost
Bridgeport	\$1,215,150	\$ 650,000	\$ 129,712	\$ 56,803	\$ 1,678,635
Hartford	\$1,029,926	\$ 650,000	\$ 114,894	\$ 53,099	\$ 1,511,933
New Haven	\$1,041,579	\$ 650,000	\$ 115,826	\$ 53,332	\$ 1,522,421
Waterbury	\$1,036,101	\$ 650,000	\$ 115,388	\$ 53,222	\$ 1,517,491
Meriden	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
New London	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
Norwich	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
New Britain	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
Stamford	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
Danbury	\$ -	\$ 400,000	\$ 20,000	\$ 20,000	\$ 360,000
Subtotal	\$4,322,756	\$ 5,000,000	\$ 595,820	\$ 336,456	\$ 8,390,480
	Total	\$ 9,322,756		\$ 932,276	

* These figures do not take into account any of the program income that will be received and redistributed.

All program income, as well as amounts to be recaptured and reallocated pursuant to the provisions of this NSP3 Action Plan will be remitted to the state who will expend such sums in accordance with the provisions of NSP3. Generation of program income by a subrecipient will result in additional authority to that subrecipient to obligate additional funds equivalent to the value of the program income generated, less a 5% administrative fee to the state, subject to continued compliance with all federal obligations under NSP3, as well as this NSP3 Action Plan, the provisions of any/all subrecipient agreements and individual cooperation agreements relative to NSP3, where applicable.

Awards

The state will not reimburse for NSP3 activities initiated prior to a formal grant award to a subrecipient or other eligible entity (i.e.: execution of a grant agreement), except in the case where funding from more than one NSP allocation is combined, consistent with the following guidance from HUD:

- The target areas overlap
- The activity is eligible based on the approved NSP1 and NSP3 plans
- There is a clear delineation of specific expenses being paid by multiple NSP allocations with no overlap
- All funds are expended and projects completed by the earliest applicable deadline.

DECD has selected four (4) local governments as subrecipients to receive the majority of the State's NSP3 allocation, consistent with the original HUD awards and in accordance with the provisions of a cooperation agreement executed between each of the four subrecipients and the state. DECD further recognizes that NSP3 funds alone may not be sufficient to

effect sustainable neighborhood stabilization in these and the other six (6) subrecipients, therefore each subrecipient will be required to establish micro-target neighborhood(s), and to propose investment strategies (financial (beyond NSP3 investment) and nonfinancial) to stabilize these micro-target neighborhoods through an application process. Each subrecipient's application should demonstrate that adequate provision shall be made for the input of the affected neighborhood residents and their representatives, as applicable. Projects and plans of prospective partners should be referenced and incorporated in the application.

DECD will work closely with each of the ten (10) communities as they develop their individual area applications. Upon receipt of each of the communities' applications, DECD will review each for inclusion of and compliance with the following criteria:

- Completeness: application addresses all component parts;
- Area Need: Targeted neighborhoods (needs score of not less than 16) and strategic allocation of resources to neighborhoods most affected by foreclosure and able to leverage existing or future resources;
 - Priority for target areas should include:
 - Proximity to schools or other educational facilities
 - Walkable neighborhoods in close proximity to bus or rail service
 - Proximity to other recent or proposed development activity (economic, housing, transportation)
- Capacity and Readiness to Execute: Ability of subrecipient and partners to implement proposed strategies within an eligible area under a limited timeframe i.e., expend all funds within 18 months from award;
- Affirmative Fair Housing and Marketing Efforts: Application must indicate how NSP3 funds will be used to further fair housing goals identified in the community's Analysis of Impediments (AI) to Fair Housing, or the state's AI;
- Impact of Proposed Activity: Strength and feasibility of proposed investment strategies for increasing affordable housing and neighborhood stabilization, including targeting 20% or more of the REO properties in the target area;
- Partnerships, Leverage and Coordination: Strength of partnerships and commitment to leveraging of local resources to implement strategies and maximize the neighborhood impact; and
- Compliance with all state and federal rules, including but not limited to environmental reviews, fair housing, etc.

Goals

1. To increase affordable workforce housing opportunities in coordination with local partners in micro-target neighborhoods most affected by foreclosure;

2. To maximize revitalization and stabilization impact in micro-target neighborhoods, focusing and coordinating investment of local and state resources;
3. Where appropriate, to purchase foreclosed residential properties for the purpose of providing affordable and permanent supportive housing;
4. To complement ongoing foreclosure prevention activities of state and local partners;
5. To address 20% or more of any REOs held within a micro-target area;
6. To minimize displacement and seek to maintain occupancy of tenants in good standing; and
7. To maximize the revitalization and stabilization impact on neighborhoods in proximity to transit (rail/bus) centers and other public investment.

The State expects NSP3 subrecipients to think strategically about the use of NSP3 funds. Different micro-targeting strategies are appropriate in different communities as well as within communities. Any micro-targeting strategy must not only identify areas, but determine how many are realistic, given the level of resources available. NSP3 activities are to serve an economically diverse population, and provide an opportunity to expand workforce housing efforts. NSP3 subrecipients need to understand current housing market and future trends in micro-targeted neighborhoods. This may mean micro-targeted areas that have not traditionally been the focus of local CDBG or HOME funds such as at-risk neighborhoods.

Guiding Principles

- Micro-target areas designated for NSP3 investment must be one or more of the NSP3 eligible target areas as identified in Appendix A eligible areas of this Substantial Amendment;
- Strategies should consider a balance of approaches that provides for affordable workforce housing strategies, including rental and homeownership opportunities;
- Subrecipients should, to the fullest extent possible, partner with other stakeholders in order to conceive and implement comprehensive neighborhood revitalization strategies;
- Subrecipients should coordinate investment strategies in order to maximize housing and neighborhood outcomes;
- Subrecipients should coordinate approaches to purchasing, renovating and reselling properties, maximizing discounts on the acquisition costs and minimizing redevelopment and disposition costs;
- Subrecipients must make use of the First Look protocol under the National Community Stabilization Trust when properties within a micro-target area are available;

- Any investment strategies should incorporate “green”, “healthy homes” and energy efficient approaches to building construction and land development; and
- Any investment strategies must make provision for the NSP3 subrecipient’s obligation that not less than 25% of the NSP3 program funds shall be used to serve families whose income does not exceed 50% of Area median income (“AMI”).

NSP3 subrecipients are expected to use other private, local, state and federal resources in combination with NSP3 funds to foster sustainable neighborhood stabilization including, but not limited to:

- Foreclosure prevention programs;
- Housing and credit counseling programs;
- Code enforcement programs;
- Blight initiatives;
- Homeowner rehabilitation programs;
- Small business assistance programs;
- Community lending programs;
- Homeownership Assistance such as;
 - Downpayment assistance,
 - Settlement costs,
 - Shared equity loans,
 - Lease to own programs, and
 - Workforce housing programs.

Build on Existing Strategies

NSP3 subrecipients are expected to build on existing effective NSP1 processes and procedures when addressing neighborhood strategies and to utilize local public and private partnerships to enhance their capacity to acquire, rehabilitate, finance, and market available properties. Processes and procedures determined to be ineffective or inefficient in NSP1 shall not be funded under NSP3.

Definition of Substantial Amendment

Any change to the method of distribution, allocation, recapture or reallocation of resources among the subrecipients of NSP3 funds, other than in accordance with the procedures set forth in the NSP3 Action Plan, as approved by HUD, shall be deemed a "Substantial Amendment" to the NSP3 Action Plan which shall require the state to amend its approved NSP3 Action Plan. Further, any change of more than 25% in the proposed activity budget in Section H shall be deemed a “Substantial Amendment” to the NSP3 Action Plan which shall require the state to amend its approved NSP3 Action Plan.

Program Income

In accordance with HUD guidance for NSP3, program income shall be remitted to DECD who shall be solely responsible for its expenditure according to the procedures set forth by HUD. DECD shall authorize a subrecipient community to allocate a value equivalent to the value of program income to the subrecipient communities that generated such program income, less a 5% administrative fee for the state. However, DECD reserves the right to

reallocate program income authorization generated by any subrecipient, as well as the uncommitted and/or unexpended (i.e. recaptured awards) portion of the state's allocation of NSP3 funds, should any subrecipient(s) fail to meet performance deadlines, or other contractual obligations. In such event, DECD shall take one or more of the following actions: (1) reallocate recaptured funds with or without program income to satisfactorily performing subrecipients under a competitive model; (2) reallocate recaptured funds with or without program income to satisfactorily performing subrecipients based on performance.

In order to assist grantees in the preparation of their substantial amendment, HUD has provided guidance in the form of the NSP3 Design Guidebook. This guidebook is available at the HUD website (<http://hudnsphelp.info/media/resources/NSP3DesignGuidebook.pdf>) and provided DECD with insight into the priorities and preferences for the use of these funds.

C. DEFINITIONS AND DESCRIPTIONS

Definition of Subrecipient under NSP3

Subrecipient: Subrecipient shall have the same meaning as at the first sentence of 24 CFR 570.500(c).

Definition of Abandoned Property under NSP3

Abandoned: A home or residential property is abandoned if either a) mortgage, tribal leasehold, or tax payments are at least 90 days delinquent, or b) a code enforcement inspection has determined that the property is not habitable and the owner has taken no corrective actions within 90 days of notification of the deficiencies, or c) the property is subject to court-ordered receivership or nuisance abatement related to abandonment pursuant to state or local law or otherwise meets a state definition of an abandoned home or residential property.

Definition of Foreclosed Property under NSP3

Foreclosed: A home or residential property has been foreclosed upon if any of the following conditions apply: a) the property's current delinquency status is at least 60 days delinquent under the Mortgage Bankers of America delinquency calculation and the owner has been notified of this delinquency, or b) the property owner is 90 days or more delinquent on tax payments, or c) under state, local, or tribal law foreclosure proceedings have been initiated or completed, or d) foreclosure proceedings have been completed and title has been transferred to an intermediary aggregator or servicer that is not an NSP grantee, subrecipient, contractor, developer, or end user.

Definition of Appraised Value under NSP3

Current Market Appraised Value: The current market appraised value means the value of a foreclosed upon home or residential property that is established through an appraisal made in conformity with the appraisal requirements of the URA at 49 CFR 24.103 and completed within 60 days prior to an offer made for the property by a grantee, subrecipient, developer, or individual homebuyer; provided however, if the anticipated acquisition is

estimated at \$25,000 or less, the current market appraised value of the property may be established by a valuation of the property that is based on a review of available data and is made by a person the grantee determines is qualified to make the valuation.

Definition of “Blighted Structure” in Context of State or Local Law

Connecticut General Statutes (CGS) § 7-148 (C) (7) (H) (xv) empowers municipalities to make and enforce regulations preventing housing blight, provided such regulations: define housing blight; establish a duty of the owner to maintain property; and specify standards to determine if there is neglect. If a municipal ordinance is more stringent than the definition below, the local ordinance shall apply.

Blighted Structure: A structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety and public welfare.

Definition of “Affordable Rents”

“**Affordable Rents**” means rents that are at or below the Fair Market Rent Levels as published by HUD, and amended from time to time; or rents that do not exceed 30% of the adjusted income of a family whose annual income equals 80% of AMI, as determined by HUD, with adjustments for number of bedrooms in the unit; or rents that do not exceed 30% of the family’s adjusted income, if the unit receives Federal project-based rental subsidy or 40% of the family’s adjusted income if the unit receives state project-based rental subsidy (i.e., tenant contribution plus project-based rental subsidy) and the rent allowable under the federal or state project-based rental subsidy program. For the NSP3 program, DECD will require that rental units assisted through the program that are restricted to 50% of median income households meet Low HOME rent limits and that 120% AMI rental units meet rents established for the DECD Housing Trust Fund Program as identified at DECD’s website at www.decd.org.

Note: *Affordable rent limits are recalculated on a periodic basis after HUD determines fair market rents and median incomes.*

Subrecipients must provide project owners with information on updated rent limits so that rents may be in accordance with the written agreement between the subrecipient and the owner. Owners must annually provide the subrecipient with information on rents and occupancy of NSP-assisted rental units to demonstrate compliance with this section.

Periods of Affordability

NSP3-assisted units must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion, which is identified as the initial occupancy of all the NSP3 assisted units in a given project. These standards mirror the HOME affordability requirements as identified in 24 CFR Part 92. The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership. They must be imposed by deed restrictions, covenants running with the land, or other mechanisms approved by DECD, except that the affordability restrictions may terminate upon foreclosure or transfer in lieu of foreclosure. Subrecipients must maintain copies of the recorded instruments in their project files.

Subrecipients may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record, before the foreclosure, or deed in lieu of foreclosure, or any entity that includes the former owner or those with whom the former owner has or had family or business ties, obtains an ownership interest in the project or property.

Minimum Period of Affordability in Years

- Rental - Each subrecipient is encouraged to exceed the minimum periods of affordability as determined below for the longest feasible term.

Rental Housing Activity	Minimum Years of Affordability
Rehabilitation or acquisition of existing housing per unit amount of HOME funds: Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000 or rehabilitation involving refinancing	15
New Construction or acquisition of newly constructed RENTAL housing (92.252.e)	20
The refinancing of existing debt secured by housing that is being rehabilitated with HOME funds (92.206.b)	15

- Homeownership - Each subrecipient is encouraged to exceed the minimum periods of affordability as determined below for the longest feasible term.

NSP Assistance Amount Per Unit	Minimum Period of Affordability in Years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

Housing Quality Standards

An owner of rental housing assisted with NSP3 funds must maintain the housing in compliance with all applicable state and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR 982. 401.

Income Certification of NSP3 Assisted Units

The income of each tenant or homebuyer must be determined initially at time of application and/or within 6 months of occupancy in accordance with the provisions of 24 CFR § 92.203(a) for the duration of the affordability period, as determined in this section, above.

Housing Rehabilitation Standards

Housing that is rehabilitated with NSP3 funds must meet all applicable local codes, rehabilitation standards, ordinance, and zoning ordinances at the time of project completion, except as noted for homeownership housing later in this section. The subrecipient must have written standards for rehabilitation that ensure that NSP3-assisted housing is decent, safe and sanitary. In the absence of a local code for rehabilitation, NSP3-assisted rehabilitation must meet, as applicable: one of four model codes - State Building Code, (Uniform Building Code (ICBO), National Building Code (BOCA), Standard (Southern) Building Code (SBCCI)); or the Council of American Buildings Officials (CABO) one or two family code; or the Minimum Property Standards (MPS) in 24 CFR 200.925 or 200.926. A subrecipient may rely on a Minimum Property Standards (MPS) inspection performed by a qualified person.

All other NSP3-assisted housing (e.g., acquisition) must meet all applicable state and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR 982.401. NSP3-assisted housing must meet the accessibility requirements at 24 CFR Part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C 794) and covered multifamily dwellings, as defined at 24 CFR 100. 201, and must also meet the design and construction requirements at 24 CFR 100.205, which implement the Fair Housing Act (42 U.S.C. 3601-3619).

For NSP3, all gut rehabilitation or new construction (i.e., general replacement of the interior of a building that may or may not include changes to structural elements such as flooring systems, columns or load bearing interior or exterior walls) of residential buildings up to three stories must be designed to meet the standard for Energy Star Qualified New Homes. All gut rehabilitation or new construction of mid -or high-rise multifamily housing must be designed to meet American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004, Appendix G plus 20 percent (which is the Energy Star standard for multifamily buildings piloted by the Environmental Protection Agency and the Department of Energy). Other rehabilitation must meet these standards to the extent applicable to the rehabilitation work undertaken, e.g., replace older obsolete products and appliances with Energy Star-46 labeled products. Water efficient toilets, showers, and faucets, such as those with the WaterSense label, must be installed.

Energy Efficient and Environmentally-Friendly Green Elements

Other than those requirements noted in the Housing Rehabilitation Standards section, DECD requires that every proposed NSP3 subrecipient make a good faith effort to incorporate the following energy efficient and environmentally-friendly green elements in its NSP3 activities, where applicable. However, no specific element is required.

- Transit accessibility.
- Green building standards.
- Re-Use cleared sites.
- Deconstruction.
- Renewable Energy
- Sustainable Site Design
- Water Conservation
- Energy Efficient Materials
- Healthy Homes

D. LOW INCOME TARGETING

The estimated amount of funds appropriated or otherwise made available under the NSP3 to be used to purchase and redevelop abandoned or foreclosed upon homes, or residential properties for housing individuals or families whose incomes do not exceed 50% of AMI is **\$2,330,689**. Of this, \$900,000 will come from the targeted allocation to the four neediest communities identified under item 3, as discussed in **Section B Distribution of Funds**.

The remaining requirement for low income targeting, **\$1,430,689**, however, will not be targeted to any specific eligible activity or subrecipient. Rather, each subrecipient is required to target at least 17% of their grant award to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of AMI. Applications must show how the subrecipient intends to meet this targeting. To the extent practicable, subrecipients should give priority consideration to permanent supportive and affordable housing dedicated to mitigating homelessness and serving families at or below 30% of AMI.

If funds are used to assist a property that was previously assisted with HOME funds but on which the affordability restrictions were terminated through foreclosure or transfer in lieu of foreclosure, the grantee must revive the HOME affordability restriction for the greater of the remaining period of HOME affordability or the continuing affordability requirements adopted by the locality.

E. ACQUISITIONS AND RELOCATION

DECD will require that all subrecipients fully comply with state and federal acquisition and relocation rules. Each subrecipient, in its application to DECD, must indicate whether any of the activities contemplated by such plan involve demolition or conversion of any low- and moderate- income dwelling units (i.e., \leq 80% of AMI). If any such demolition or conversion is contemplated, the following information is also required to be provided for each applicable activity (including a proposed time schedule for commencement and completion):

- The number of low- and moderate-income dwelling units (i.e., ≤ 80% of AMI) reasonably expected to be demolished or converted as a direct result of NSP3-assisted activities;
- The number of NSP3 affordable housing units reasonably expected to be made available to low-, moderate-, and middle-income households (i.e., ≤ 120% of AMI); and
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of AMI.

Additionally, each subrecipient in its application should provide information on how it plans to satisfy the requirements of this section, including compliance with the state and federal requirements set forth in this section.

Connecticut General Statutes (CGS) § 8-37z reads in part that “... the Commissioner of Economic and Community Development shall ensure that the involuntary displacement of persons and families residing in any single-family or multifamily dwelling, which displacement occurs in connection with any housing or community development project or economic development project receiving state financial assistance under any program administered by the commissioner under the general statutes, is reduced to the minimum level consistent with achieving the objectives of such program...”

Subrecipients contemplating activities that will trigger displacement or conversion must submit, prior to the initiation of any activity, a completed Relocation Plan that conforms to federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) requirements as set forth in 42 USC 4201-4655 and 49 CFR Part 24. Federal law governing relocation will apply to projects utilizing NSP3 funds, except where Connecticut law imposes more stringent requirements.

There may be reasonable activities a subrecipient may undertake which might trigger displacement. Some examples might be acquisition of foreclosed multifamily structures containing existing tenant occupied units, or acquisition of foreclosed property occupied by commercial businesses. However, every effort should be made to avoid displacement under such circumstances. Additionally, selective demolition may be used only to assist in stabilizing or stemming further deterioration in a neighborhood. DECD requires that subrecipients minimize any demolition or conversion of a low or moderate income dwelling units to the greatest extent possible.

F. PUBLIC COMMENT

Citizen Participation Process

DECD published a legal notice in two (2) newspapers on January 27, 2011. At least one (1) of the publications was in Spanish. The legal notice informed the public of the 15 day public comment period and the availability of the draft NSP3 Action Plan for review and comment. The public comment period began on January 28 and ended on February 11, 2011.

A copy of the legal notice and the draft NSP3 Action Plan were posted to the DECD website at www.decd.org. Copies of the legal notice were also sent to all 169 Chief Elected Officials as well as local housing authorities, non-profit housing organizations and Regional Planning Organizations throughout the state. A copy of the legal notice is included in Appendix B of this document.

Anyone wishing to offer comments could do so until February 11, 2011, either by writing to the address below or via email at NSP.Comment@ct.gov.

NSP3 Comments
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106-7106

Summary of Public Comments

All comments received regarding the draft NSP3 Action Plan during the public comment period have been summarized and attached as Appendix C. The final NSP3 Action Plan will be posted to the DECD website.

G. NSP3 INFORMATION BY ACTIVITY (Complete for Each Activity)

(1) Activity Name: **Acquisition and Rehabilitation**

(2) Activity Type: The purchase and rehabilitation of homes and residential properties that have been abandoned or foreclosed upon in order to sell, rent, or redevelop such homes and properties.

Acquisition: CDBG reference: 24 CFR Part 570.201

Rehabilitation: CDBG reference: 24 CFR Part 570.202

(3) National Objective: Direct Benefit to LMMI persons.

(4) Activity Description: Subrecipient communities will acquire abandoned and foreclosed properties, including those which may be occupied, for rehabilitation, demolition of blighted buildings, for possible re-sale to eligible low and moderate income families or other activities meeting LMMI benefit. Any rehabilitation of foreclosed upon homes and residential properties will be carried out to bring such properties up to minimum housing standards in order to sell, rent, or redevelop said properties. All properties will be occupied by households meeting the LMMI standard. Whenever possible, the "First Look" initiative will be used to acquire properties in eligible micro-target areas.

(5) Location Description: Eligible micro-target areas will be identified from within eligible census tracts. Specific addresses, blocks or neighborhoods will be determined when applications are submitted.

(6) Performance Measures: The objective of this activity is to provide decent, safe, and affordable housing to LMMI families through addressing the purchase and rehabilitation of foreclosed properties. The outcome measurements for this activity will be the creation of affordable units. See Section I. Performance Measurements for overall program measurements, indicators, and standards.

Subrecipients will be required to submit quarterly reports that detail activities completed, activities to be undertaken, including the following information by numbers, costs, and racial ethnic data:

- # of properties acquired
- # of units rehabilitated
- # of households displaced
- # of units meeting energy star standards
- # of units meeting Section 504 standards
- # of units meeting lead safe standards
- # of rental and homeowner units occupied
- Household characteristics of displaced households
- Household characteristics by unit of new occupants

(7) Total Budget: Estimated at \$6,712,384. See Section H for overall program budget.

(8) Responsible Organization: Subrecipient Contact Roster, Appendix D

(9) Projected Start Date: April 15, 2011

(10) Projected End Date: April 15, 2014

(11) Specific Activity Requirements:

Acquisition -

All eligible subrecipients will be required to make use of the "First Look" protocol, when available in micro-target areas. The number of properties to be acquired is estimated between 40-50 units.

Rehabilitation - All rehabilitated properties will assure affordability periods consistent with the HOME Investment Partnerships Program by requiring the use of deed restrictions, restrictive covenants, or other such mechanism running with the land. Affordability periods will be consistent with the HOME Program Standards at 24 CFR 92.252(a), (c), (e) and (f) and 24 CFR 92.254. The duration of any affordability will meet the requirements of Section **C. Definitions and Descriptions** and will range from 5 to 15 years dependent on the amount of funds invested per unit.

The rehabilitation of acquired properties must bring units up to minimum property standards for rental or resale to income eligible households. Each subrecipient must have its own rehabilitation standards the use of which has been approved by HUD or DECD, as applicable. "Rehabilitation Standards" shall mean the more stringent of state or local codes or federal housing quality standards, as promulgated by HUD and the housing cost effective energy conservation and effectiveness standards in 24 CFR Part 248.147.

(1) Activity Name: **Administration**

(2) Activity Type: Administration. CDBG reference: 24 CFR Part 570.206

(3) National Objective: N/A

(4) Activity Description: Administrative funds related to carrying out the NSP3 program will be available to both the state and subrecipients as detailed in Section H. – Total Budget. Funds will be available for both general administrative and technical assistance costs.

(5) Location Description: Administrative costs to be used by the state of Connecticut and the eligible subrecipient communities.

(6) Performance Measures: N/A

(7) Total Budget: \$932,276

(8) Responsible Organization: Grantee and Subrecipient Contact Roster, Appendix D.

(9) Projected Start Date: April 15, 2011

(10) Projected End Date: April 15, 2014

(11) Specific Activity Requirements: Administrative costs are reasonable costs of state or local governments to meet the requirements of the NSP3, including but not limited to general management and oversight, providing public information, technical support services, and assuring fair housing activities. All subrecipient administrative funds must be drawn down on a pro-rata basis equal to the percentage of funds obligated by the sub-grantees. Any property specific activity obligation for which administrative funds have been drawn must be completed within nine months or the administrative funds may be recaptured.

(1) Activity Name: **Demolition of Blighted Structures**

(2) Activity Type: Demolition of Blighted Buildings and related clearance activities for the purpose of providing sites for homeownership or rental development, or other eligible activity. CDBG reference: 24 CFR 570.201(d)

(3) National Objective: Demolition of Blighted structures to be replaced by housing units for LMMI households through either immediate redevelopment or other eligible use consistent with 24 CFR 570.201(d). If demolished properties are not used for redevelopment as housing, then the activity must meet the LMMI area benefit or limited clientele test.

(4) Activity Description: To acquire blighted buildings and demolish same for to provide sites for home ownership, rental housing development, or other CDBG eligible activity benefitting LMMI persons. The subrecipient communities have been designated as having the greatest need within the state based on available federal and state data.

(5) Location Description: Eligible micro-target areas will be identified from within eligible census tracts. Specific addresses, blocks or neighborhoods will be determined when applications are submitted.

(6) Performance Measures: The objective of this activity is to provide decent, safe, and affordable housing to LMMI families through addressing the purchase and rehabilitation of foreclosed properties. The outcome measurements for this activity will be the creation of affordable units. See Section I. Performance Measurements for overall program measurements, indicators, and standards.

Subrecipients will be required to submit quarterly reports that detail activities completed, activities to be undertaken, including the following information by numbers, costs, and racial ethnic data:

- # of properties demolished
- # of units demolished
- # of households displaced
- Household characteristics of displaced households

It is anticipated that between 1-5 units will be demolished.

(7) Total Budget: \$256,376. See Section H for overall program budget.

(8) Responsible Organization: Subrecipient Contact Roster, Appendix D

(9) Projected Start Date: April 15, 2011

(10) Projected End Date: April 15, 2014

(11) Specific Activity Requirements: Documentation by subrecipients that all demolitions being carried out under the NSP3 program is required due to the condition of the property and that a specific eligible reuse has been identified.

(1) Activity Name: **Financing Mechanisms**

(2) Activity Type: The establishment of Financing Mechanisms to assist in the purchase and redevelopment of foreclosed housing. CDBG reference: 24 CFR Part 570.201(n) Homeownership Assistance.

(3) National Objective: Direct benefit to LMMI households.

(4) Activity Description: Funds will be made available for eligible activities to include acquisition, rehab and the redevelopment of demolished housing. Activities may be in the form of loans, grants, soft seconds, loan loss reserves, shared-equity loans or other mechanisms to foster homeownership and rental housing opportunities for LMMI households. Interest rates may range from 0% to 5% and will be determined based on standard underwriting practices. It is anticipated that most loans will be at 0% per annum. However, interest rates may not exceed 5% and it is anticipated that rates above 0% will only be used to projects with rental properties where the operating proforma indicates that the project operating budget can support the proposed debt coverage ratios are from 1.15 to 1.25.

(5) Location Description: Eligible micro-target areas will be identified from within eligible census tracts. Specific addresses, blocks or neighborhoods will be determined when applications are submitted.

(6) Performance Measures:

The objective of this activity is to provide decent, safe, and affordable housing to LMMI families through addressing the purchase and rehabilitation of foreclosed properties. The outcome measurements for this activity will be the creation of affordable units. See Section I. Performance Measurements for overall program measurements, indicators, and standards.

Subrecipients will be required to submit quarterly reports that detail activities completed, activities to be undertaken, including the following information by numbers, costs, and racial ethnic data:

- # of properties assisted
- # of units rehabilitated
- # of units meeting energy star standards
- # of units meeting Section 504 standards
- # of units meeting lead safe standards
- # of rental and homeowner units occupied
- Household Characteristics by unit

It is anticipated that many of the funded activities will overlap in the LMMI households served. For example, the buyer of a property acquired and rehabilitated with NSP3 may also receive downpayment assistance financing through this activity. It is estimated that 1-3 households will receive secondary financing through this activity based on an estimated of \$5,000 - \$8,000 per unit.

(7) Total Budget: \$23,307. See Section H for overall program budget.

(8) Responsible Organization: Subrecipient Contact Roster, Appendix D

(9) Projected Start Date: April 15, 2011

(10) Projected End Date: April 15, 2014

(11) Specific Activity Requirements: Any first time homebuyer activities must include a copy of a written agreement with a HUD-approved housing counseling agency to provide pre- and post-housing counseling services and a copy of the proposed curriculum. Any homebuyer activities must ensure that a buyer's payment of principal, interest, taxes, insurance (PITI) and association fees (if applicable) cannot exceed 30% of the household's anticipated gross annual income for eligible persons or families. However, if the purchase is part of an approved governmental first mortgage program, DECD may accept that governmental agency's higher ratios upon a written request of the subrecipient. Approved governmental programs include, but are not limited to CHFA, USDA, Federal Home Loan Bank, Fannie Mae, Connecticut CDFI Alliance or FHA.

All properties assisted through these mechanisms will be occupied by households meeting the LMMI standard. All assisted properties will assure affordability periods consistent with the HOME Investment Partnerships Program by requiring the use of deed restrictions, restrictive covenants, or other such mechanisms running with the land. Affordability periods will be consistent with the HOME Program Standards at 24 CFR 92.252(a), (c), (e) and (f) and 24 CFR 92.254.

Interest rates may range from 0% to 5% and will be determined based on standard underwriting practices. It is anticipated that most loans will be at 0% per annum. However, interest rates may not exceed 5% and it is anticipated that rates above 0% will only be used on projects with rental properties where the operating proforma indicates that the project operating budget can support the proposed debt coverage ratios are from 1.15 to 1.25.

(1) Activity Name: **Redevelopment of Demolished or Vacant Properties**

(2) Activity Type: The redevelopment of demolished or vacant properties through the new construction of residential dwelling units. CDBG Reference: CDBG eligible activity 570.201(n).

(3) National Objective: Benefit to LMMI Persons

(4) Activity Description: New construction of housing units may be carried out as part of a demolition of blighted property activity. Reuse must meet CDBG requirements and service to LMMI persons. New construction (reconstruction) on these properties can be carried out

by the grantee or sub-recipient and the properties then sold to low, moderate or middle income families at affordable prices.

(5) Location Description: Eligible micro-target areas will be identified from within eligible census tracts. Specific addresses, blocks or neighborhoods will be determined when applications are submitted..

(6) Performance Measures:

The objective of this activity is to provide decent, safe, and affordable housing to LMMI families through addressing the purchase and rehabilitation of foreclosed properties. The outcome measurements for this activity will be the creation of affordable units. See Section I. Performance Measurements for overall program measurements, indicators, and standards.

Subrecipients will be required to submit quarterly reports that detail activities completed, activities to be undertaken, including the following information by numbers, costs, and racial ethnic data:

- # of properties redeveloped
- # of units redeveloped
- # of units meeting energy star standards
- # of units meeting Section 504 standards
- # of rental and homeowner units occupied
- Household characteristics by unit

It is anticipated that the overall program will achieve the acquisition, rehab, resale, and redevelopment of 10-20 units of affordable housing. Of this figure, it is anticipated that between 5-10 units will be rehabilitated and that 1-5 properties will be demolished. For demolished properties, 1-5 will be redeveloped immediately and 1-2 will be used for other CDBG eligible activities. Redevelopment activities will be carried out in conjunction with local financial resources.

(7) Total Budget: \$1,398,413. See Section H for overall program budget.

(8) Responsible Organization: Subrecipient Contact Roster, Appendix D

(9) Projected Start Date: April 15, 2011

(10) Projected End Date: April 15, 2014

(11) Specific Activity Requirements: All assisted properties will assure affordability periods consistent with the HOME Investment Partnerships Program by requiring the use of deed restrictions, restrictive covenants, or other such mechanism running with the land. Affordability periods will be consistent with the HOME Program Standards at 24 CFR 92.252(a), (c), (e) and (f) and 24 CFR 92.254. The duration of any affordability will meet the requirements of **Section C. Definitions and Descriptions** and will range from 5 to 15 years dependent on the amount of funds invested per unit, with 20 year affordability periods required for the new construction of rental units.

H. TOTAL BUDGET: (INCLUDE PUBLIC AND PRIVATE COMPONENTS)

NSP3 Eligible Activity		NSP3 Funds	State \$'s	% of Total
Administration	State	\$ 336,456.00	\$0	3.6%
	Subrecipients	\$ 595,820.00	\$0	6.4%
Acquisition and Rehabilitation		\$ 6,712,384.00	\$0	72.0%
Financing Mechanisms		\$ 23,307.00	\$0	0.25%
Demolition of Blighted Structures		\$ 256,376.00	\$0	2.75%
Redevelopment of Vacant or Demo		<u>\$ 1,398,413.00</u>	<u>\$0</u>	<u>15.0%</u>
		\$ 9,322,756.00	\$0	100.00%

I. PERFORMANCE MEASURES

Performance Measurements

It is anticipated that many of the funded activities will overlap in the LMMI households served. For example, an acquired property may also be demolished and redeveloped for an LMMI family. All three activities will serve the same household and for reporting purposes, will be recorded under Acquisition/Rehabilitation. It is estimated that 60-70 households will be served with the initial funding.

- It is estimated that 10-20 units of housing will be acquired and rehabilitated for the income levels of households that are 50% of AMI and below.
- It is estimated that 20-30 units of housing will be acquired and rehabilitated for the income levels of households that are between 51-80% of AMI.
- It is estimated that 10-20 units of housing will be acquired and rehabilitated for the income levels of households that are between 81-120% of AMI.
- Range of interest rates – 0% to 5%. It is anticipated that most loans will be at 0% per annum. However, interest rate may not exceed 5% and it is anticipated that rates above 0% will only be used for projects with rental properties where the operating proforma indicates that the project can support debt repayment.

It is anticipated that the overall program will achieve the acquisition, rehab, resale, and redevelopment of 60-70 units of affordable housing. It is anticipated that between 1-5 units will be demolished. It will be required that any rental units acquired, rehabilitated, or redeveloped through the NSP3 program meet the same LMMI income requirements. Sub-grantees under the NSP3 program will be required to provide information necessary for DECD to compile the following reports which will document program performance achievement and timely completion of activities.

Reporting

DECD will be required to:

- Submit quarterly performance reports to HUD online and to post those reports online for public viewing as well. Reports will be due 30 days after the end of each quarter, starting 30 days after the first full calendar quarter after grant award and continuing until the end of the program or HUD issues alternative instructions ; and
- Submit monthly expenditure reports to HUD until reported total expenditures are equal or greater than the total NSP3 grant. Once that point is reached, monthly reporting will cease.

Disaster Recovery Grant Reporting System

- DECD will be required to report on the used of NSP3 funds through this online system.
- The State must post NSP3 reports on their own websites for public viewing.
- The State will be required to submit a quarterly report and report monthly on NSP obligations and expenditures.
- The State or contracted staff will monitor and ensure compliance of all Federal and State requirements.

Performance Indicators and Reallocation of Funds

DECD reserves the right to reallocate funds from a subrecipient based on failure to carry out their contract activities in a timely manner. DECD and each subrecipient will be required to establish specific achievement goals related to the expenditure of funds. Subrecipients will be required to establish goals and timeframes for expenditures under each activity, consistent with the performance indicators in state's NSP3 Action Plan.

DECD has established the following minimum timeframes regarding the expenditure of funds, and occupancy of units:

Expenditure of Funds

180 days 10% of funds expended
360 days 25% of funds expended
540 days 50% of funds expended
720 days 75% of funds expended
900 days 100% of funds expended

Should subrecipients fail to achieve the expenditure levels indicated above, DECD may, in its sole discretion, but only after formal discussion with the subrecipient, reallocate funds to other performing subrecipients in order to ensure that the federal expenditure requirements are met.

Occupancy of Units

360 days 10% of units occupied/sold
540 days 25% of units occupied/sold
720 days 50% of units occupied/sold
900 days 90% of units occupied/sold
1080 days 100% of units occupied/sold

Outcome Measures

Each subrecipient will be expected to measure the extent to which neighborhoods have been restored to sustainable health and stability. For example:

Outcomes – Reduced blight and abandonment in the area
Improved property values
Increased community investment (as measured by building permits)
Increased homeownership rates
Reduced crime rates
Reduced poverty levels
Increased tax base

DECD will work closely with representatives of the subrecipients in developing a standard set of outcome measures which reflects the extent to which neighborhoods have been restored to sustainable health and stability.

Appendix A Eligible Census Tracts

<u>LOGRECNO</u>	<u>SUM090</u>	<u>NAME</u>	<u>COUNTY NAME</u>	<u>NSP3 NEED SCORE</u>
CT0000153	090010807008000070200R3	BRIDGEPORT	Fairfield County	18
CT0000155	090010807008000070200U1	BRIDGEPORT	Fairfield County	18
CT0000156	090010807008000070200U2	BRIDGEPORT	Fairfield County	18
CT0000157	090010807008000070200U3	BRIDGEPORT	Fairfield County	18
CT0000158	090010807008000070200U4	BRIDGEPORT	Fairfield County	18
CT0000175	090010807008000070600R1	BRIDGEPORT	Fairfield County	18
CT0000176	090010807008000070600R2	BRIDGEPORT	Fairfield County	18
CT0000178	090010807008000070600U1	BRIDGEPORT	Fairfield County	18
CT0000179	090010807008000070600U2	BRIDGEPORT	Fairfield County	18
CT0000182	090010807008000070900U1	BRIDGEPORT	Fairfield County	20
CT0000183	090010807008000070900U2	BRIDGEPORT	Fairfield County	20
CT0000184	090010807008000070900U3	BRIDGEPORT	Fairfield County	20
CT0000187	090010807008000071000U1	BRIDGEPORT	Fairfield County	18
CT0000188	090010807008000071000U2	BRIDGEPORT	Fairfield County	18
CT0000189	090010807008000071000U3	BRIDGEPORT	Fairfield County	18
CT0000192	090010807008000071100U1	BRIDGEPORT	Fairfield County	19
CT0000193	090010807008000071100U2	BRIDGEPORT	Fairfield County	19
CT0000194	090010807008000071100U3	BRIDGEPORT	Fairfield County	19
CT0000197	090010807008000071200U1	BRIDGEPORT	Fairfield County	20
CT0000198	090010807008000071200U2	BRIDGEPORT	Fairfield County	20
CT0000199	090010807008000071200U3	BRIDGEPORT	Fairfield County	20
CT0000200	090010807008000071200U4	BRIDGEPORT	Fairfield County	20
CT0000203	090010807008000071300U1	BRIDGEPORT	Fairfield County	20
CT0000204	090010807008000071300U2	BRIDGEPORT	Fairfield County	20
CT0000207	090010807008000071400U1	BRIDGEPORT	Fairfield County	19
CT0000208	090010807008000071400U2	BRIDGEPORT	Fairfield County	19
CT0000209	090010807008000071400U3	BRIDGEPORT	Fairfield County	19
CT0000210	090010807008000071400U4	BRIDGEPORT	Fairfield County	19
CT0000211	090010807008000071400U5	BRIDGEPORT	Fairfield County	19
CT0000214	090010807008000071600U1	BRIDGEPORT	Fairfield County	20
CT0000215	090010807008000071600U2	BRIDGEPORT	Fairfield County	20
CT0000218	090010807008000071700U1	BRIDGEPORT	Fairfield County	19
CT0000221	090010807008000071800U1	BRIDGEPORT	Fairfield County	17
CT0000222	090010807008000071800U2	BRIDGEPORT	Fairfield County	17
CT0000223	090010807008000071800U3	BRIDGEPORT	Fairfield County	17
CT0000226	090010807008000071900U1	BRIDGEPORT	Fairfield County	18

CT0000227	090010807008000071900U2	BRIDGEPORT	Fairfield County	18
CT0000230	090010807008000072000U1	BRIDGEPORT	Fairfield County	18
CT0000231	090010807008000072000U2	BRIDGEPORT	Fairfield County	18
CT0000234	090010807008000072100U1	BRIDGEPORT	Fairfield County	16
CT0000235	090010807008000072100U2	BRIDGEPORT	Fairfield County	16
CT0000236	090010807008000072100U3	BRIDGEPORT	Fairfield County	16
CT0000239	090010807008000072200U1	BRIDGEPORT	Fairfield County	17
CT0000240	090010807008000072200U2	BRIDGEPORT	Fairfield County	17
CT0000241	090010807008000072200U3	BRIDGEPORT	Fairfield County	17
CT0000244	090010807008000072300U1	BRIDGEPORT	Fairfield County	18
CT0000245	090010807008000072300U2	BRIDGEPORT	Fairfield County	18
CT0000246	090010807008000072300U3	BRIDGEPORT	Fairfield County	18
CT0000249	090010807008000072400U1	BRIDGEPORT	Fairfield County	18
CT0000250	090010807008000072400U2	BRIDGEPORT	Fairfield County	18
CT0000253	090010807008000072500U1	BRIDGEPORT	Fairfield County	17
CT0000254	090010807008000072500U2	BRIDGEPORT	Fairfield County	17
CT0000255	090010807008000072500U3	BRIDGEPORT	Fairfield County	17
CT0000256	090010807008000072500U4	BRIDGEPORT	Fairfield County	17
CT0000266	090010807008000072700U1	BRIDGEPORT	Fairfield County	18
CT0000267	090010807008000072700U2	BRIDGEPORT	Fairfield County	18
CT0000268	090010807008000072700U3	BRIDGEPORT	Fairfield County	18
CT0000271	090010807008000072800U1	BRIDGEPORT	Fairfield County	19
CT0000272	090010807008000072800U2	BRIDGEPORT	Fairfield County	19
CT0000273	090010807008000072800U3	BRIDGEPORT	Fairfield County	19
CT0000276	090010807008000072900U1	BRIDGEPORT	Fairfield County	19
CT0000277	090010807008000072900U2	BRIDGEPORT	Fairfield County	19
CT0000278	090010807008000072900U3	BRIDGEPORT	Fairfield County	19
CT0000281	090010807008000073000U1	BRIDGEPORT	Fairfield County	17
CT0000284	090010807008000073100U1	BRIDGEPORT	Fairfield County	17
CT0000285	090010807008000073100U2	BRIDGEPORT	Fairfield County	17
CT0000286	090010807008000073100U3	BRIDGEPORT	Fairfield County	17
CT0000289	090010807008000073200U1	BRIDGEPORT	Fairfield County	16
CT0000290	090010807008000073200U2	BRIDGEPORT	Fairfield County	16
CT0000293	090010807008000073300U1	BRIDGEPORT	Fairfield County	19
CT0000294	090010807008000073300U2	BRIDGEPORT	Fairfield County	19
CT0000297	090010807008000073400U1	BRIDGEPORT	Fairfield County	18
CT0000298	090010807008000073400U2	BRIDGEPORT	Fairfield County	18
CT0000299	090010807008000073400U3	BRIDGEPORT	Fairfield County	18
CT0000302	090010807008000073500U1	BRIDGEPORT	Fairfield County	20
CT0000303	090010807008000073500U2	BRIDGEPORT	Fairfield County	20
CT0000304	090010807008000073500U3	BRIDGEPORT	Fairfield County	20
CT0000307	090010807008000073600U1	BRIDGEPORT	Fairfield County	19

CT0000308	090010807008000073600U2	BRIDGEPORT	Fairfield County	19
CT0000309	090010807008000073600U3	BRIDGEPORT	Fairfield County	19
CT0000312	090010807008000073700U1	BRIDGEPORT	Fairfield County	19
CT0000313	090010807008000073700U2	BRIDGEPORT	Fairfield County	19
CT0000314	090010807008000073700U3	BRIDGEPORT	Fairfield County	19
CT0000315	090010807008000073700U4	BRIDGEPORT	Fairfield County	19
CT0000316	090010807008000073700U5	BRIDGEPORT	Fairfield County	19
CT0000319	090010807008000073800U1	BRIDGEPORT	Fairfield County	19
CT0000320	090010807008000073800U2	BRIDGEPORT	Fairfield County	19
CT0000321	090010807008000073800U3	BRIDGEPORT	Fairfield County	19
CT0000324	090010807008000073900R3	BRIDGEPORT	Fairfield County	20
CT0000326	090010807008000073900U1	BRIDGEPORT	Fairfield County	20
CT0000327	090010807008000073900U2	BRIDGEPORT	Fairfield County	20
CT0000328	090010807008000073900U3	BRIDGEPORT	Fairfield County	20
CT0000329	090010807008000073900U4	BRIDGEPORT	Fairfield County	20
CT0000332	090010807008000074000R1	BRIDGEPORT	Fairfield County	19
CT0000333	090010807008000074000R2	BRIDGEPORT	Fairfield County	19
CT0000335	090010807008000074000U1	BRIDGEPORT	Fairfield County	19
CT0000336	090010807008000074000U2	BRIDGEPORT	Fairfield County	19
CT0000339	090010807008000074300R5	BRIDGEPORT	Fairfield County	19
CT0000341	090010807008000074300U1	BRIDGEPORT	Fairfield County	19
CT0000342	090010807008000074300U2	BRIDGEPORT	Fairfield County	19
CT0000343	090010807008000074300U3	BRIDGEPORT	Fairfield County	19
CT0000344	090010807008000074300U4	BRIDGEPORT	Fairfield County	19
CT0000345	090010807008000074300U5	BRIDGEPORT	Fairfield County	19
CT0000346	090010807008000074300U6	BRIDGEPORT	Fairfield County	19
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CT0007128	090098007080000351300U4	WATERBURY	New Haven County	17
CT0007129	090098007080000351300U5	WATERBURY	New Haven County	17
CT0007130	090098007080000351300U6	WATERBURY	New Haven County	17
CT0007133	090098007080000351400U1	WATERBURY	New Haven County	18
CT0007134	090098007080000351400U2	WATERBURY	New Haven County	18
CT0007135	090098007080000351400U3	WATERBURY	New Haven County	18
CT0007138	090098007080000351500U1	WATERBURY	New Haven County	18
CT0007139	090098007080000351500U2	WATERBURY	New Haven County	18
CT0007140	090098007080000351500U3	WATERBURY	New Haven County	18
CT0007141	090098007080000351500U4	WATERBURY	New Haven County	18
CT0007156	090098007080000351700U1	WATERBURY	New Haven County	18
CT0007157	090098007080000351700U2	WATERBURY	New Haven County	18
CT0007179	090098007080000352200U1	WATERBURY	New Haven County	17
CT0007182	090098007080000352300U1	WATERBURY	New Haven County	17
CT0007183	090098007080000352300U2	WATERBURY	New Haven County	17
CT0007186	090098007080000352400U1	WATERBURY	New Haven County	17
CT0007193	090098007080000352600U1	WATERBURY	New Haven County	16
CT0007194	090098007080000352600U2	WATERBURY	New Haven County	16
CT0007195	090098007080000352600U3	WATERBURY	New Haven County	16
CT0007202	090098007080000352702U1	WATERBURY	New Haven County	16
CT0007203	090098007080000352702U2	WATERBURY	New Haven County	16
CT0007204	090098007080000352702U3	WATERBURY	New Haven County	16

Appendix A Supplement Data Dictionary

LOGRECNO = Logical Record Number from the Census 2000 downloadable data. This can be used to match these data to other data downloaded from the Census 2000 SF3 data files at summary level 090.

SUM090 = This is the unique GeoID from Census 2000 for this record. The subcomponents are:

- State 1-2 State FIPS Code
- County 3-5 Census 2000 County FIPS code
- County Subdivision 6-10 Census 2000 Census County Subdivision Code
- Place 11-15 Census 2000 Census Place Code
- Tract 12-21 Census 2000 Census Tract Code
- Urban/Rural 22 Census 2000 Designation as Urban or Rural (U/R)
- Block Group 23 Census 2000 Block Group Code

NAME = This reflects the name of the NSP1 Subrecipient municipality.

COUNTY NAME = The name of the County.

NSP3 NEED SCORE = The NSP3 foreclosure need score for the target geography. See the HUD website for the methodology and the formula for an explanation of how this score was calculated.

Appendix B: Legal Notice

**NOTICE OF PUBLIC COMMENT PERIOD
THE STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
IS SEEKING PUBLIC COMMENT ON THE DRAFT
NEIGHBORHOOD STABILIZATION PROGRAM 3 (NSP3) ACTION PLAN SUBSTANTIAL
AMENDMENT UNDER SECTION 1497 OF THE DODD-FRANK WALL STREET REFORM
AND CONSUMER PROTECTION ACT**

A fifteen-day public examination and comment period will begin Friday, January 28, 2011 and end Friday, February 11, 2011.

All interested parties are encouraged to participate by reviewing and providing comment on the state's Draft Neighborhood Stabilization Program 3 (NSP3) Action Plan Substantial Amendment. A copy of the state's Draft Neighborhood Stabilization Program Action Plan Substantial Amendment as well as the state's five-year Consolidated Plan for Housing and Community Development and the annual Action Plans are available at the Department of Economic & Community Development's web site, www.decd.org.

All comments must be submitted in writing to the address below or via email to NSP.Comments@ct.gov. Comments must be received by the close of business on Friday, February 11, 2011.

NSP3 Comments
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106-7106

Comments will be summarized and addressed in the Public Commentary Section of the Final NSP3 Action Plan Substantial Amendment, which will be posted on the Department's website, www.decd.org.

Department of Economic and Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-566-1755.

Distribution Date: January 28, 2011

**ANUNCIO DE PERÍODO DE COMENTARIOS PÚBLICOS
EI ESTADO DE CONNECTICUT DEPARTEMENTO DE DESSAROLLO ECONÓMICO Y
COMUNITARIO SOLICITA COMENTARIOS AL BORRADOR DE LA ENMIENDA
SUSTANCIAL DEL PLAN DE ACCIÓN DEL “NEIGHBORHOOD STABILIZATION
PROGRAM 3” (NSP 3) AUTORIZADO POR SECCIÓN 1497 DEL “DODD-FRANK WALL
STREET REFORM AND CONSUMER PROTECTION ACT”.**

Un período de quince días para examinar y hacer comentarios durará del viernes, el 28 de enero 2011 hasta el viernes, el 11 de febrero 2011.

Todos partidos interesados deben participar, revisar y hacer comentarios a este borrador de la enmienda sustancial del Plan de Acción de NSP3. Una copia del borrador de la enmienda sustancial, también el Plan de Consolidación de Cinco Años para Viviendas y Desarrollo Comunitario y el Plan de Acción Anual están disponibles en la página del Departamento de Economía y Desarrollo Comunitario, www.decd.org.

Todos los comentarios deben hacerse por escritos y sometidos a la dirección abajo o por mensaje electrónico (e-mail) a NSP.Comments@ct.gov antes del fin de negocio el viernes, el 11 de febrero, 2011.

NSP3 Comments
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106-7106

Estos comentarios serán resumidos y presentados en la Sección de Comentarios Públicos en la copia final de la enmienda sustancial del Plan de Acción del NSP3 que se encontrará en www.decd.org.

El Departamento de Desarrollo Económico y Comunitario administra programas sin discriminación, consistente con igualdad de oportunidades de empleo, acción afirmativa, y los requisitos de equidad de vivienda. Las preguntas, los comentarios, las quejas o las peticiones para información en formatos alternativos deben ser dirigidos al coordinador de ADA (504) a 860-566-1755.

Fecha de distribución: el 28 de enero 2011

APPENDIX C SUMMARY OF PUBLIC COMMENTS

In total, four (4) sets of comments were received pursuant to the public comment period for the NSP3 Substantial Amendment Action Plan. In summary, three were supportive of the department's expedited process for allocation these federal funds to the highest need municipalities and the distribution method for the majority of the total grant funds available.

Three comments were received which were not supportive of the department's competitive approach to the \$1M set-aside and recommended an equal direct distribution of these additional funds to the four neediest communities.

One commenter recommended a number of revisions to the plan and expressed some specific concerns. These recommendations and concerns are detailed below:

1. That the \$1M competitive set-aside be opened to all ten (10) original NSP1 grantees.
2. That the distribution method of fund be revised to a flat percentage distribution essentially equivalent to the percentage distribution under NSP1.
3. That smaller award recipients receive a larger percentage of administrative funds available.
4. Reduce or eliminate low income and homeless targeting, and limit affordability to minimum required under the HOME program.
5. Smaller allocations (\$380,000) are too small to have an impact that can realistically affect the targeted 20% of REO properties in a micro-target area.
6. Expressed concern over outcome measures and a perceived imbalance.
7. Expressed concern over requested leveraging in the proposed application.
8. Recommended that administrative funds be decoupled from project specific activities.

As a result of the comments received, the following revisions to the plan have been implemented:

The \$1M competitive set-aside has been removed, and those funds evenly distributed between and amongst the four neediest communities. The targeted use of these funds, to serve families at or below 50% of AMI remains associated with these funds, thus increasing the 50% of AMI set-aside for the four neediest communities.

No other substantive changes were made as a result of comments received.

Appendix D

Grantee and Subrecipient Contact Roster

Grantee:

Department of Economic and Community Development
Ronald F. Angelo, Jr.
Acting Commissioner
505 Hudson Street
Hartford, CT 06106

Subrecipient Contact:

City of Bridgeport
Office of the Mayor
The Honorable Bill Finch
City Hall Annex
999 Broad Street
Bridgeport, CT 06604

City of Waterbury
Office of the Mayor
The Honorable Michael J. Jarjura
Chase Municipal Building
236 Grand St.
Waterbury, CT 06702

City of New Haven
Office of the Mayor
The Honorable John DeStefano, Jr.
City Hall
165 Church Street
New Haven CT 06510

City of Hartford
Office of the Mayor
The Honorable Pedro E. Segarra
550 Main Street
2nd Floor, Room 200
Hartford, CT 06103

City of Meriden
Office of the City Manager
The Honorable Lawrence Kendzior
Meriden City Hall
142 East Main Street
Meriden, CT 06450

City of Stamford
Office of the Mayor
The Honorable Michael Pavia
10th Floor Government Center
888 Washington Boulevard
Stamford, CT 06901

City of New London
Office of the City Manager
The Honorable Martin Berliner
New London City Hall
181 State Street
New London, CT 06320

City of New Britain
Office of the Mayor
The Honorable Timothy Stewart
New Britain City Hall
27 West Main Street
New Britain, CT 06051

City of Norwich
Office of the City Manager
The Honorable Alan Bergren
City Hall 2nd Floor
100 Broadway
Norwich, CT 06604

City of Danbury
Office of the Mayor
The Honorable Mark Boughton
Danbury City Hall
155 Deer Hill Avenue
Danbury, CT 06810

**Appendix E
Supplemental Needs Data**

Rank based on 2010 LP filings	Town	2000 Number of Owner-Occupied Housing Units	01/01/10 to 09/30/10		01/01/09 to 12/31/09	
			Number of Lis Penden Filings (Jan. 2010 - Sept. 2010)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units	Number of Lis Penden Filings (Jan. 2009 - Dec. 2009)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units
1	Bridgeport	21,755	1,544	7.10%	2,334	10.73%
2	New Haven	13,927	724	5.20%	1,125	8.08%
3	Hartford	11,064	536	4.84%	709	6.41%
4	Waterbury	20,291	906	4.47%	1,230	6.06%
5	New Britain	12,191	474	3.89%	565	4.63%
6	Norwich	7,924	304	3.84%	320	4.04%
7	Meriden	13,743	520	3.78%	761	5.54%
8	Sterling	920	34	3.70%	58	6.30%
9	West Haven	11,632	422	3.63%	531	4.56%
10	Naugatuck	7,863	282	3.59%	331	4.21%
11	New London	3,861	138	3.57%	215	5.57%
12	Scotland	483	17	3.52%	8	1.66%
13	East Haven	8,168	267	3.27%	342	4.19%
14	Killingly	4,112	129	3.14%	179	4.35%
15	New Milford	7,771	242	3.11%	315	4.05%
16	Ansonia	4,171	122	2.92%	150	3.60%
17	Danbury	15,849	462	2.92%	652	4.11%
18	East Hartford	11,626	332	2.86%	476	4.09%
19	Derby	3,056	87	2.85%	100	3.27%
20	Brooklyn	1,865	53	2.84%	51	2.73%
21	Voluntown	779	22	2.82%	25	3.21%
22	Hamden	15,069	419	2.78%	519	3.44%
23	Putnam	2,061	57	2.77%	81	3.93%
24	Ledyard	4,354	115	2.64%	123	2.82%
25	Middletown	9,520	251	2.64%	307	3.22%
26	Windham	4,038	103	2.55%	113	2.80%
27	Norwalk	20,280	512	2.52%	687	3.39%
28	Plymouth	3,497	88	2.52%	114	3.26%
29	Chaplin	677	17	2.51%	24	3.55%
30	Cromwell	3,969	99	2.49%	116	2.92%
31	Griswold	2,961	72	2.43%	110	3.71%
32	Eastford	494	12	2.43%	7	1.42%
33	Ashford	1,156	28	2.42%	30	2.60%
34	Plainfield	3,736	90	2.41%	159	4.26%
35	Stamford	25,719	614	2.39%	730	2.84%
36	Bloomfield	5,916	141	2.38%	180	3.04%
37	Thomaston	2,152	51	2.37%	45	2.09%
38	Deep River	1,365	32	2.34%	24	1.76%

Rank based on 2010 LP filings	Town	2000 Number of Owner-Occupied Housing Units	01/01/10 to 09/30/10		01/01/09 to 12/31/09	
			Number of Lis Penden Filings (Jan. 2010 - Sept. 2010)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units	Number of Lis Penden Filings (Jan. 2009 - Dec. 2009)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units
39	Sprague	735	17	2.31%	17	2.31%
40	Goshen	934	21	2.25%	19	2.03%
41	Winchester	2,814	62	2.20%	68	2.42%
42	Norfolk	500	11	2.20%	7	1.40%
43	Bristol	15,410	338	2.19%	398	2.58%
44	East Haddam	2,675	58	2.17%	55	2.06%
45	Torrington	9,521	205	2.15%	295	3.10%
46	Andover	1,000	21	2.10%	22	2.20%
47	Wolcott	4,766	100	2.10%	108	2.27%
48	Seymour	4,383	91	2.08%	126	2.87%
49	Stratford	15,989	331	2.07%	449	2.81%
50	Branford	8,601	178	2.07%	224	2.60%
51	Montville	4,973	101	2.03%	137	2.75%
52	Windsor	8,497	172	2.02%	221	2.60%
53	Oxford	3,043	61	2.00%	82	2.69%
54	Morris	714	14	1.96%	11	1.54%
55	East Windsor	2,657	51	1.92%	61	2.30%
56	Canterbury	1,477	28	1.90%	37	2.51%
57	Groton	7,815	146	1.87%	165	2.11%
58	Manchester	13,059	242	1.85%	350	2.68%
59	Bethel	4,983	92	1.85%	125	2.51%
60	Plainville	5,132	94	1.83%	103	2.01%
61	Clinton	4,098	75	1.83%	93	2.27%
62	Pomfret	1,041	19	1.83%	20	1.92%
63	Thompson	2,789	50	1.79%	82	2.94%
64	Vernon	6,935	120	1.73%	161	2.32%
65	Preston	1,520	26	1.71%	33	2.17%
66	Washington	1,111	19	1.71%	18	1.62%
67	Portland	2,633	45	1.71%	42	1.60%
68	Watertown	6,385	109	1.71%	120	1.88%
69	Colchester	4,027	68	1.69%	95	2.36%
70	Weston	3,087	51	1.65%	83	2.69%
71	Wallingford	12,134	199	1.64%	240	1.98%
72	Beacon Falls	1,594	26	1.63%	53	3.32%
73	Bethany	1,609	26	1.62%	37	2.30%
74	Windsor Locks	3,726	60	1.61%	85	2.28%
75	North Stonington	1,624	26	1.60%	45	2.77%
76	Westbrook	1,908	30	1.57%	40	2.10%
77	Stafford	3,248	51	1.57%	78	2.40%
78	Trumbull	10,828	169	1.56%	236	2.18%
79	Lisbon	1,351	21	1.55%	24	1.78%

Rank based on 2010 LP filings	Town	2000 Number of Owner-Occupied Housing Units	01/01/10 to 09/30/10		01/01/09 to 12/31/09	
			Number of Lis Penden Filings (Jan. 2010 - Sept. 2010)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units	Number of Lis Penden Filings (Jan. 2009 - Dec. 2009)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units
80	Madison	5,746	89	1.55%	64	1.11%
81	Coventry	3,683	57	1.55%	74	2.01%
82	Brookfield	4,960	76	1.53%	82	1.65%
83	Killingworth	2,099	32	1.52%	31	1.48%
84	Newtown	7,654	116	1.52%	148	1.93%
85	Lebanon	2,164	32	1.48%	40	1.85%
86	New Fairfield	4,334	64	1.48%	80	1.85%
87	Enfield	12,414	183	1.47%	244	1.97%
88	Shelton	11,604	171	1.47%	222	1.91%
89	Monroe	6,054	88	1.45%	106	1.75%
90	Chester	1,122	16	1.43%	21	1.87%
91	Haddam	2,315	33	1.43%	54	2.33%
92	East Hampton	3,337	47	1.41%	62	1.86%
93	Guilford	6,959	97	1.39%	133	1.91%
94	Warren	432	6	1.39%	10	2.31%
95	Hebron	2,669	37	1.39%	39	1.46%
96	Stonington	5,418	75	1.38%	95	1.75%
97	Southbury	6,464	89	1.38%	96	1.49%
98	Salem	1,164	16	1.37%	25	2.15%
99	Tolland	4,264	58	1.36%	59	1.38%
100	Waterford	6,371	86	1.35%	128	2.01%
101	Mansfield	3,271	44	1.35%	56	1.71%
102	Milford	16,148	216	1.34%	317	1.96%
103	Marlborough	1,811	24	1.33%	23	1.27%
104	Prospect	2,797	37	1.32%	37	1.32%
105	Canton	2,835	37	1.31%	43	1.52%
106	Franklin	617	8	1.30%	16	2.59%
107	Easton	2,324	30	1.29%	42	1.81%
108	Burlington	2,695	34	1.26%	39	1.45%
109	Fairfield	16,962	213	1.26%	293	1.73%
110	Redding	2,629	33	1.26%	54	2.05%
111	Union	240	3	1.25%	1	0.42%
112	Newington	9,688	121	1.25%	143	1.48%
113	Middlefield	1,389	17	1.22%	13	0.94%
114	Bethlehem	1,065	13	1.22%	17	1.60%
115	Woodbury	2,786	34	1.22%	65	2.33%
116	Woodstock	2,295	28	1.22%	56	2.44%
117	North Branford	4,322	52	1.20%	87	2.01%
118	Kent	836	10	1.20%	30	3.59%
119	Ridgefield	7,201	86	1.19%	98	1.36%
120	East Granby	1,514	18	1.19%	22	1.45%

Rank based on 2010 LP filings	Town	2000 Number of Owner-Occupied Housing Units	01/01/10 to 09/30/10		01/01/09 to 12/31/09	
			Number of Lis Penden Filings (Jan. 2010 - Sept. 2010)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units	Number of Lis Penden Filings (Jan. 2009 - Dec. 2009)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units
121	Avon	5,316	63	1.19%	76	1.43%
122	Hampton	592	7	1.18%	6	1.01%
123	Willington	1,535	18	1.17%	19	1.24%
124	Rocky Hill	4,951	58	1.17%	68	1.37%
125	Columbia	1,709	20	1.17%	21	1.23%
126	Sharon	957	11	1.15%	19	1.99%
127	Ellington	3,572	41	1.15%	58	1.62%
128	Essex	2,228	25	1.12%	44	1.97%
129	Southington	12,277	137	1.12%	160	1.30%
130	Old Saybrook	3,495	39	1.12%	62	1.77%
131	North Canaan	901	10	1.11%	15	1.66%
132	Bridgewater	633	7	1.11%	7	1.11%
133	East Lyme	4,954	54	1.09%	69	1.39%
134	South Windsor	7,953	86	1.08%	125	1.57%
135	Salisbury	1,204	13	1.08%	20	1.66%
136	Middlebury	2,135	23	1.08%	28	1.31%
137	West Hartford	17,664	188	1.06%	178	1.01%
138	Farmington	7,155	76	1.06%	97	1.36%
139	North Haven	7,440	79	1.06%	167	2.24%
140	Glastonbury	10,017	106	1.06%	149	1.49%
141	Simsbury	7,147	75	1.05%	82	1.15%
142	Suffield	3,827	40	1.05%	53	1.38%
143	Granby	3,356	35	1.04%	37	1.10%
144	Barkhamsted	1,152	12	1.04%	16	1.39%
145	New Hartford	1,925	20	1.04%	29	1.51%
146	Wethersfield	8,733	88	1.01%	101	1.16%
147	Bolton	1,629	16	0.98%	24	1.47%
148	Durham	2,072	20	0.97%	31	1.50%
149	Berlin	5,996	57	0.95%	59	0.98%
150	Westport	8,203	77	0.94%	111	1.35%
151	Cheshire	8,097	76	0.94%	142	1.75%
152	Wilton	5,351	50	0.93%	72	1.35%
153	Old Lyme	2,492	23	0.92%	31	1.24%
154	Greenwich	15,990	147	0.92%	223	1.39%
155	Sherman	1,311	12	0.92%	20	1.53%
156	Litchfield	2,598	23	0.89%	26	1.00%
157	Woodbridge	2,758	24	0.87%	36	1.31%
158	Harwinton	1,822	15	0.82%	21	1.15%
159	Orange	4,401	36	0.82%	48	1.09%
160	Roxbury	741	6	0.81%	15	2.02%

Rank based on 2010 LP filings	Town	2000 Number of Owner-Occupied Housing Units	01/01/10 to 09/30/10		01/01/09 to 12/31/09	
			Number of Lis Penden Filings (Jan. 2010 - Sept. 2010)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units	Number of Lis Penden Filings (Jan. 2009 - Dec. 2009)	Number of Lis Penden Filings as a Percent of Owner-Occupied Housing Units
161	New Canaan	5,650	45	0.80%	74	1.31%
162	Somers	2,554	19	0.74%	22	0.86%
163	Darien	5,799	38	0.66%	63	1.09%
164	Hartland	648	4	0.62%	6	0.93%
165	Colebrook	487	3	0.62%	6	1.23%
166	Canaan	358	2	0.56%	4	1.12%
167	Bozrah	725	4	0.55%	14	1.93%
168	Lyme	733	4	0.55%	7	0.95%
169	Cornwall	493	2	0.41%	7	1.42%
	Total CT	869,729	18,502	2.13%	24,544	2.82%