

Community Development Block Grant

Disaster Recovery Program

Action Plan

Substantial Amendment for Second Tranche



DEPARTMENT OF HOUSING

Evonne M. Klein, Commissioner

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A. Executive Summary

The State of Connecticut Substantial Amendment (this “Amendment”) to the 2013 Action Plan for Community Development Block Grant Program Disaster Recovery is required to be submitted by the State of Connecticut (the “State”) to the U.S. Department of Housing and Urban Development (“HUD”) as a condition to its receipt of \$66,000,000 of federal funding under the Community Development Block Grant – Disaster Recovery (CDBG-DR) Program (the “Funding”).¹ The Funding was authorized under The Disaster Relief Appropriations Act (the “Act”), which was signed into law by President Barack Obama on January 29, 2013. The allocation of the Funding to the State is intended primarily to enable it to address immediate unmet housing and economic revitalization needs in those counties and jurisdictions that were most severely impacted by Hurricane Sandy.

The State must submit this Amendment and obtain its approval by HUD before it can receive any portion of the Funding.

This Amendment describes the programs and activities for which the State intends to expend the Funding in compliance with the federal requirements set forth in public notices released by HUD on November 18, 2013, in the Federal Register at Vol. 78, No. 222, Page 69104 entitled: “ Second Allocations, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” and March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” and April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (collectively, the “Federal Register Notice”).

In accordance with the Federal Register Notice, this Amendment must also provide an assessment of the need for the Funding, the State’s public outreach and citizen participation practices. The State is obligated to ensure that the processes, procedures, and fiscal and administrative controls it will use in the course of expending the Funding are sufficient to safeguard the Funding from waste, fraud and abuse.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. Accordingly, HUD is allowing Grantees to request less than the full funding amount in a Partial Amendment. The State of Connecticut, like other states to which CDBG-DR Program funds were allocated by HUD, will pursue incremental obligation of the Funding to support its Hurricane Sandy relief

¹ The amount of the Funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the Funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the Funding.

and restoration programs and activities to ensure compliance with HUD’s deadlines. Specifically, the State is requesting that HUD make \$15 million available immediately upon approval of this Amendment. HUD has assured the State that as it submits additional requests for additional portions of the Funding to be released, so long as everything is in order, they will approve the request promptly and without delay.

Activity	CDBG-DR Second Tranche Activities and Proposed Allocation		
	Unmet Need	Proposed Allocation	Initial Allocation
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	\$56,000,000	\$4,200,000	\$ 0
Owner-Occupied Reimbursement (Completed Rehab and Mitigation) <ul style="list-style-type: none"> • 0 – 80% AMI – Priority One • 80 – 120 % AMI – Priority Two • 120 - 150% AMI – Priority Three 	\$33,600,000	\$11,200,000	\$ 5,000,000
Owner-Occupied Mitigation (Second Homes NOT eligible) <ul style="list-style-type: none"> • 0 – 100% AMI – Grant • 100 – 120 % AMI - \$30k grant/referral to Shoreline RF • 120 - 150% AMI – \$15k grant/referral to Shoreline RF 	\$21,900,000	\$10,000,000	\$ 6,500,000
Infrastructure	\$151,600,000	\$30,000,000	\$ 3,000,000
Evidence-based Strategies	NA	\$300,000	\$ 0
Administration	NA	\$3,300,000	\$ 500,000
Planning for Mitigation/Resiliency	\$25,000,000	\$7,000,000	\$ 0
TOTAL	\$288,100,000	\$66,000,000	\$15,000,000

Although this Amendment identifies the State's current request for the expenditure of \$15 million, this Amendment fully complies with the Federal Register Notice and describes the State's intended use of all of the Funding.

The Act provides that funding under the CDBG-DR Program must be used "for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster."

In addition to specifying the amount of funds allocated to the State, the Federal Register Notice also sets forth, among other requirements, the areas within the State where the Funding can be expended, the programs or activities for which the Funding can be used, and the national objectives that each program or activity must meet.

The only areas in which the Funding can be expended are Fairfield County, New Haven County, Middlesex County, New London County and the Mashantucket Pequot Indian Reservation. This requirement is consistent with the damage and impact assessments that were reported by the Federal Emergency Management Agency ("FEMA"), the U.S. Small Business Administration ("SBA"), the Connecticut Department of Emergency Services and Public Protection division of Emergency Management and Homeland Security ("DESPP/DEMHS"), as well as municipalities within the impacted counties. Within these eligible areas, the Federal Register Notice requires that 80% of the Funding must be expended in Fairfield and New Haven Counties.

Broad categories for CDBG-DR Program eligible activities include: Housing, Infrastructure, Public Facilities, Economic Revitalization, and Planning. A limited portion of the funds may be used for the cost of administering the CDBG-DR Program.

Some of the specific CDBG-DR Program eligible activities that HUD has identified include the following:

- acquisition of real property;
- acquisition, rehabilitation and construction of public works and facilities; buyouts;
- code enforcement;
- relocation assistance;
- new construction, reconstruction and rehabilitation of residential and nonresidential properties;
- new construction, reconstruction and rehabilitation of public housing;
- repair or rehabilitation of infrastructure;
- American Disability Act improvements;
- rental assistance (limited);
- storm mitigation measures;
- special economic development including: grants and loans to SBA-defined small businesses, job training, and the revitalization of business districts;
- fair housing counseling; and
- homeownership counseling and assistance.

With respect to CDBG-DR Program eligible activities, the State must also ensure that at least 50% of its CDBG-DR grant funds are used for activities that benefit low- and moderate-income (“LMI”) persons. LMI persons are defined for the purposes of the CDBG-DR Program as persons and families whose income does not exceed 80% of the area median income (“AMI”), as determined by HUD. This 50% requirement applies to the State’s expenditure of the entirety of the Funding, less administration and planning, and does not apply to each individual program or activity. For the purposes of this Amendment, that would mean a minimum of \$27,850,000 of these funds must be obligated to the national objective of benefitting low- and moderate- income persons.

As set forth in the Federal Register Notice, the Funding cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of the Funding, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a “National Objective”): low- and moderate income benefit; elimination of slum and blight; and urgent need.

Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of the Funding can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget. HUD has granted a number of general program waivers which have provided greater flexibility to the administration of the program. One of particular note is that 42 U.S.C. 5305(a) has been waived to the extent necessary to allow: homeownership assistance for households up to 120% of AMI, down payment assistance for up to 100% of the down payment, and new housing construction. While homeownership assistance may be provided to households up to 120% of AMI, only those funds used to serve households with up to 80% of AMI may qualify as meeting the low- and moderate-income person benefit National Objective.

States may request additional waivers of program requirements by providing sufficient evidence that such waiver is necessary for the effective administration of the Funding. As of the date of this Amendment, the State has requested one such specific waiver relative to homeowner reimbursements. Current federal regulation allows homeowner reimbursement for those eligible expenses incurred by homeowners on or before October 29, 2013; one year from the event. The State requested that eligible expenses which have been incurred by eligible homeowners for eligible activities be allowed beyond the one year limitation. On February 11, 2014 DOH received notice from Yolanda Chavez, the Deputy Assistant Secretary for Grant Programs at HUD that this waiver request had been denied.

The State reserves the right to pursue such additional waivers under all broad program categories as may be appropriate and necessary as additional information relative to “unmet need” and other parameters is obtained.

Governor Dannel P. Malloy has designated the Connecticut Department of Housing (“DOH”) the principal state agency for the allocation and administration of Funding. DOH will administer the Funding through application processes. The eligibility requirements identified by DOH include the following (though not all requirements will apply to all types of projects):

- Applicants must be “Eligible Applicants” as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each proposed activity must be an “Eligible Activity” as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each project must meet at least one National Objective and such National Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Amendment must be demonstrated;
- Fair Housing and Equal Opportunity compliance must be evidenced by a Fair Housing Amendment that complies with DOH’s guidelines/policies; and
- Each applicant must be in compliance with all existing assistance agreements with the Department of Economic and Community Development (“DECD”) and DOH and cannot be in default under any CHFA or HUD-administered program.

In addition to meeting the federal obligations associated with the Funding, this Amendment reflects the fact that the State’s first priority is to get financial assistance to as many affected residents as possible, assisting them in the repair or reconstruction of their homes to get their lives back in order, and to small businesses to get their business running and get our local economy back in business. The State, acting through DOH, will use the Funding to provide financial assistance directly to assist eligible homeowners, multi-family property owners, including, for example, public housing authorities, small businesses, municipalities and other eligible recipients to ensure the State’s recovery from the damage caused by Hurricane Sandy in all areas for which the Funding can be used under applicable federal regulations. This Amendment describes the priorities that the State has used to allocate the Funding among the eligible activities. Again, it is important to note that this Amendment requests immediate access to the first \$15,000,000 of the Funding but is in no way an indication that the State does not intend to expend all of the Funding as quickly and effectively as possible.

DOH is committed to implementing the allocation of the Funding authorized under the Disaster Relief Appropriations Act, and further detailed in the public notices released by HUD on November 18, 2013, in the Federal Register at Vol. 78, No. 222, Page 69104 entitled: “Second Allocations, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” and March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” and April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” in an effective and efficient

manner. DOH recognizes the need to return individuals and families back to their homes and get businesses back in business by addressing immediate unmet needs. DOH will also consider the long term resiliency and mitigation requirements of our communities. DOH has and will continue to work closely with its federal, state, local, and regional partners in addressing the immediate unmet needs in the affected communities, while planning responsibly for the future.

Overview of Substantial Amendment

Federal Requirements – Second Tranche

On Monday, November 18, 2013 the Department of Housing received notification from the U.S. Department of Housing and Urban Development that the State of Connecticut was scheduled to receive an additional, or Second Tranche, of federal funds in the amount of \$66,000,000.

To achieve this goal, HUD promulgated regulations that established the regulatory framework for the receipt and expenditure of the Second Tranche of CDBG-DR Program funds, all as set forth in Federal Register Notice (Vol. 78, No. 222; November 8, 2013 Page 69104) titled: “Second Allocation, Waivers, and Alternative Requirements for Grantees

Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (the “Federal Register Notice”).

The Appropriations Act requires funds to be used only for specific disaster recovery related purposes. Consistent with the Rebuilding Strategy, it is essential to build back stronger and more resilient. This allocation provides additional funds to Sandy-impacted grantees to support investments in mitigation and resilience and directs grantees to undertake comprehensive planning to promote regional resilience as part of the recovery effort. The Appropriations Act requires that prior to the obligation of CDBG-DR funds, a grantee shall submit a plan detailing the proposed use of funds, including criteria for eligibility and how the use of these funds will address disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas. In an Action Plan for Disaster Recovery (Action Plan), grantees must describe uses and activities that: (1) Are authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCD Act) or allowed by a waiver or alternative requirement published in this Notice and the prior Notices; and (2) respond to a disaster-related impact. HUD has previously approved an Action Plan for each grantee receiving an allocation of funds in this Notice. Grantees are now directed to submit a substantial Action Plan Amendment in order to access funds provided in this Notice.

To access funds grantees must submit a Substantial Amendment to their approved Action Plan. Any Substantial Amendment submitted is subject to the following requirements:

- DOH consults with affected citizens, stakeholders, local governments and public housing authorities to determine updates to its needs assessment; in addition, grantee prepares a comprehensive risk analysis;
- DOH amends its citizen participation plan to reflect the new requirement for a public hearing;
- DOH publishes a substantial amendment to its previously approved Action Plan for Disaster Recovery on the grantee’s official Web site or no less than 30 calendar days and holds at least one public hearing to solicit public comment;

- DOH responds to public comment and submits its Substantial Amendment to HUD no later than 120 days after the effective date (November 23, 2013);
- HUD reviews the Substantial Amendment within 60 days from date of receipt and approves the Amendment according to all published criteria;
- HUD sends a Substantial Amendment approval letter, revised grant conditions (if applicable), and an amended unsigned grant agreement to DOH.
- If the substantial Amendment is not approved, a letter will be sent identifying its deficiencies; DOH must then re-submit the Amendment within 45 days of the notification letter;
- DOH ensures that the HUD approved Substantial Amendment is posted on its official Web site.

Use of the Second Tranche Funds

The Act provides that funding under the CDBG-DR Program must be used “for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster.”

In addition to specifying the amount of funds allocated to Connecticut in the second tranche, the Federal Register Notice also sets forth the areas within Connecticut where the Second Tranche Funds can be expended, the programs or activities for which the Second Tranche Funds can be used, the national objectives that each program or activity must meet and all other critical requirements with which all grantees must comply.

Several specific requirements are especially important. First, the only areas within Connecticut in which the Second Tranche Funds can be expended are Fairfield County, New Haven County, Middlesex County, New London County and the Mashantucket Pequot Indian Reservation. The municipalities within these counties are set forth in the table on the following page.

ELIGIBLE CDBG-DR COMMUNITIES IN CONNECTICUT			
Fairfield County	New Haven County	New London County	Middlesex County
Bethel	Ansonia	Bozrah	Chester
Bridgeport	Beacon Falls	Colchester	Clinton
Brookfield	Bethany	East Lyme	Cromwell
Danbury	Branford	Franklin	Deep River
Darien	Cheshire	Griswold	Durham
Easton	Derby	Groton	East Haddam

Fairfield	East Haven	Lebanon	East Hampton
Greenwich	Guilford	Ledyard	Essex
Monroe	Hamden	Lisbon	Haddam
New Canaan	Madison	Lyme	Killingworth
New Fairfield	Meriden	Montville	Middlefield
Newtown	Middlebury	New London	Middletown
Norwalk	Milford	North Stonington	Old Saybrook
Shelton	Naugatuck	Norwich	Portland
Sherman	New Haven	Old Lyme	Westbrook
Stamford	North Branford	Preston	
Stratford	North Haven	Salem	
Redding	Orange	Sprague	
Ridgefield	Oxford	Stonington	
Trumbull	Prospect	Voluntown	
Weston	Seymour	Waterford	
Westport	Southbury		
Wilton	Wallingford		
	Waterbury		
	West Haven		
	Wolcott		
	Woodbridge		

Second, not less than 80% of the Second Tranche Funds must be expended in Fairfield and New Haven Counties.

Third, the State must also ensure that at least 50% of its CDBG-DR grant funds are used for activities that benefit low- and moderate-income (“LMI”) persons. LMI persons are defined for the purposes of the CDBG-DR Program as persons and families whose income does not exceed 80% of the area median income, as determined by HUD. This 50% requirement applies to the CDBG-DR Program as a whole and does not apply to each individual program or activity.

Fourth, the Second Tranche Funds cannot be used to benefit private utilities or second homes.

Finally, while the Second Tranche Funds can be used for any eligible purpose, HUD has indicated that the intended programmatic focus of these funds is infrastructure, and infrastructure-related projects.

Definition of an Infrastructure Project and Related Infrastructure Projects

(1) Infrastructure Project: For the purposes of this program, an infrastructure project is defined as an activity, or a group of related activities, designed to accomplish, in whole or in part, a specific objective related to critical infrastructure sectors such as energy, communications, water and wastewater systems, and transportation, as well as other support measures such as flood control. This definition is rooted in the implementing regulations of the National Environmental Policy Act (NEPA) at 40 CFR part 1508 and 24 CFR Part 58. Further, consistent with HUD's NEPA implementing requirements at 24 CFR

58.32(a), DOH must group together and evaluate as a single infrastructure project all individual activities which are related to one another, either on a geographical or functional basis, or are logical parts of a composite of contemplated infrastructure-related actions.

(2) Related Infrastructure Project: Consistent with 40 CFR part 1508, infrastructure projects are "related" if they automatically trigger other projects or actions, cannot or will not proceed unless other projects or actions are taken previously or simultaneously, or are interdependent parts of a larger action and depend on the larger action for their justification.

Activities that can be funded with the First or Second Tranche Funds include, without limitation: acquisition of real property; acquisition, rehabilitation and construction of public works and facilities; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; repair or rehabilitation of infrastructure; American Disability Act improvements; rental assistance (limited); storm mitigation measures; special economic development including: grants and loans to SBA defined small business, job training, and the revitalization of business districts; fair housing counseling; homeownership counseling and assistance; and assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee's certification to affirmatively further fair housing.

Broad program categories for CDBG-DR Program eligible activities include: Housing, Infrastructure, Public Facilities, Economic Revitalization, and Planning. A limited portion of these funds may be used for the cost of administering the CDBG-DR Program.

Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is ineligible to be assisted with these funds. For example, funds cannot be used for general government expenses or political activities.

Proposed Allocation of Disaster Recovery Funds from the First Tranche

Table 1 below shows the activities and funding levels for the first tranche of CDBG-DR funds.

Table 1			
CDBG-DR Tranche 1 Activities and Funding			
Activity	Unmet Need in All Eligible Areas	Original Allocation	Revised Allocation
Owner-Occupied Rehabilitation	\$57,137,184	\$30,000,000	\$33,000,000
Multi-family (Rehab & New Construction)	\$147,907,500	\$26,000,000	\$26,000,000
Infrastructure	\$21,407,853	\$4,000,000	\$4,000,000
Public Facilities	\$34,527,307	\$2,200,000	\$2,200,000
Economic Revitalization	\$10,797,888	\$4,000,000	\$1,000,000
Mitigation	\$27,758,056	0	0
Administration	NA	\$3,591,000	\$3,591,000
Planning	NA	\$2,029,000	\$2,029,000
TOTAL	\$299,535,788	\$71,820,000	\$71,820,000

Owner-Occupied Housing (Rehabilitation & Mitigation)

Original Allocation: \$30,000,000

Revised Allocation: \$33,000,000

Most of the damage caused by Hurricane Sandy was to residential structures. In its original Action Plan, the state estimated that there were 5,500 homes with unmet need that would be eligible for CDBG-DR assistance. The expected breakdown of these 5,500 homes with unmet needs is provided in Table 2 below. The first tranche revised allocation amount of \$33,000,000 will address about 58 percent of the estimated unmet need.

Table 2			
Owner-Occupied Rehab and Mitigation Assistance by Type			
Type of Assistance	Unmet Need Units	Per Unit Average Estimated Cost	Total Estimated Cost
Rehab Assistance Only – Insured	3,700	\$5,000	\$18,500,000
Rehab Assistance Only – Uninsured	1,300	\$25,000	\$32,500,000
Mitigation Assistance – FEMA Leveraged	200	\$10,250	\$2,050,000
Mitigation Assistance – Not FEMA Leveraged	100	\$41,000	4,100,000
TOTAL UNMET NEED	5,500	\$10,391	\$57,150,000

Multi-family Housing (Rehabilitation, New Construction & Mitigation)

Allocation: \$26,000,000

Approximately 1,298 multifamily LMI units were directly affected by Hurricane Sandy. Of these 1,298 units, 483 units are not in a flood plain and only require rehabilitation at an estimated aggregate cost of \$1.63 million (all of which is an unmet need).

The remaining 815 units are in the flood plain and require either rehabilitation and mitigation or demolition and new construction at one or more other sites, at an estimated aggregate cost of \$240 million, and an unmet need of \$148 million. These 815 units are currently spread among eight separate properties.

Under its LIHTC program, the state will award preference points for up to two CDBG-DR eligible projects. The state has set aside \$2 million of its LIHTC allocation for this purpose. This \$2 million set aside along with leveraging the CDBG-DR funds with other sources, including bonds and 4 percent credits, is expected to address \$130 million (approximately 88 percent) of the \$148 million in unmet need.

Infrastructure

Allocation: \$4,000,000

While the State identified \$21.4 million in total unmet infrastructure needs, \$4 million was determined to be urgent in nature that needed to be addressed with CDBG-DR funds. These repairs include water and sewer repairs (\$1 million), municipal-owned utility repairs (\$1.1 million) and critical road repairs (\$1 million). The balance of the allocation (\$900,000) will be used to initiate architectural, environmental and other preconstruction activities for infrastructure projects to be undertaken with future allocations of funds.

Public Facilities

Allocation: \$2,200,000

In response to the State’s request for unmet needs data, local governments identified at least eighty-eight projects with unmet needs totaling approximately \$34.5 million. The State identified \$1.5 million of public building repair projects that were ready to be undertaken immediately. The remaining \$700,000 will be used to initiate architectural, engineering, environmental and other preconstruction activities for the public facility projects to be undertaken with future allocations of funds.

Economic Revitalization:

Allocation: \$4,000,000

Revised Allocation: \$1,000,000

Economic Revitalization will be reduced in overall funding to \$ 1 million. The demand for funds in the State’s Small Business Express program was significantly lower than initially projected, as illustrated in Table 3. In all, eleven businesses made application for a Small Business Express grant or loan. Applications totaled \$414,740.

TABLE 3: APPLICANTS TO THE SMALL BUSINESS EXPRESS PROGRAM BY NAICS CLASSIFICATION		
Number of Businesses	NAICS Code	NAICS Classification
1	42446	Fish and Seafood Merchant Wholesalers
3	72251	Restaurants and Other Eating Places
1	45391	Pet and Pet Supplies Stores
1	44419	Other Building Material Dealers
1	53211	Passenger Car Rental and Leasing
1	72111	Hotels (except Casino Hotels) and Motels
1	44314	Electronics and Appliance Stores
2	71393	Marinas

One applicant has withdrawn; four applicants are having their applications reviewed; two applications are in financial review; two applicants have received letters of intent and one application is at legal pending closing. Applicants requested \$414,740, or approximately 10% of the allocation of \$4 million. If 80% of current applicants are funded the amount committed would be less than \$350,000. The volume of applicants does not appear likely to increase in the short to intermediate term. Therefore, the State has reallocated \$3 million of funds from this activity.

Planning

Allocation: \$2,029,000

\$1,849,000 will be used to assist the State, regional planning agencies, and/or local governments to plan resiliency and mitigation investments that are anticipated to be addressed with future allocations of funds. This may include establishing a coordinated effort to promote consistency in resiliency and mitigation planning across State agencies and local governments, training and capacity building initiatives to promote preparedness, hazard mitigation, and future disaster resilience at the local, regional and state level, and specific studies to coordinated, cost effective long-term resiliency and mitigation investments.

\$180,000 of these Planning funds will be used to offset the costs incurred to develop the proposed programs and activities through which the Funding will be administered.

Administration

Allocation: \$3,591,000

The proposed amount is equal to the amount HUD allows the State to use for Administration of CDBG-R (i.e. 5% of the grant), recognizing that the cost of effective grant administration.

In part, this is due to HUD's recognition that the potential for fraud, waste and abuse is significant with this particular federal program based on past experience nationally. The federal government has seen this all too clearly as a result of other disasters in other parts of the country over the last 5 to 7 years. As a result, the financial and programmatic requirements for the use, distribution, and monitoring of these funds are stringent. In order to meet these stringent obligations significant staff and administrative resources are necessary to ensure federal compliance.

In addition, there are long term compliance and monitoring requirements associated with the Funding that will require oversight by the State well beyond the period during which program funds may be expended. Specifically, all program funds must be committed to specific projects on or before June 1, 2018. As required in the Federal Notice, all program funds must be fully expended, with all projects completed before March 19, 2019. However, some projects will require compliance monitoring by the State for up to fifteen years beyond 2019.

In order to effectively administer the Funding, consistent with these federal requirements, and to ensure that the necessary safe guards are provided, and monitoring processes and procedures are established and followed, the State intends to utilize the full allotment of administrative funds allowed under the Federal Register Notice. However, prior to the commitment date noted above, the State can request that a portion of these funds be reallocated to program activity as necessary and DOH intends to use these funds for such purpose, if appropriate.

Proposed Allocation of the Second Tranche Funds

Again, based on current application activity to date, as well as anticipated activity information received from our municipal and state partners, DOH is proposing to allocate the Second Tranche Funds among the broad eligible activity areas is set forth in the table below:

Table 4		
CDBG-DR Second Tranche Activities and Proposed Allocation		
Activity	Unmet Need	Proposed Allocation
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	\$56,000,000	\$4,200,000
Owner-Occupied Reimbursement (Completed Rehab and Mitigation) <ul style="list-style-type: none"> • 0 – 80% AMI – Priority One • 80 – 120 % AMI – Priority Two • 120 - 150% AMI – Priority Three 	\$33,600,000	\$11,200,000
Owner-Occupied Mitigation (Second Homes NOT eligible) <ul style="list-style-type: none"> • 0 – 100% AMI – Grant • 100 – 120 % AMI - \$30k grant/referral to Shoreline RF • 120 - 150% AMI – \$15k grant/referral to Shoreline RF 	\$21,900,000	\$10,000,000
Infrastructure	\$151,600,000	\$30,000,000
Evidence-based Strategies	NA	\$300,000
Administration	NA	\$3,300,000
Planning for Mitigation/Resiliency	\$25,000,000	\$7,000,000
TOTAL	\$288,100,000	\$66,000,000

Administration of the Program

DOH will administer the Second Tranche Funds through selective application processes wherever feasible. The project eligibility requirements contemplated by DOH include the following (though not all requirements will apply to all types of projects):

- Applicants must be “Eligible Applicants” as defined by HUD program regulations as modified by the Federal Register Notice;
- Proposed activity must be an “Eligible Activity” as defined by HUD program regulations as modified by the Federal Register Notice;
- Projects must meet at least one National Objective and such national Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Action Plan must be demonstrated;
- Fair Housing and Equal Opportunity Compliance must be evidenced by a Fair Housing Action Plan that complies with DOH’s guidelines/policies; and
- Applicants must be in compliance with all existing assistance agreements with DOH and cannot be in default under any CHFA or HUD-administered program.

Owner-Occupied Housing (Unmet Rehabilitation & Mitigation)

Allocation: \$4,200,000

Based on the current applications received from First Tranche activity, it appears that some additional unmet need associated with rehabilitation and mitigation will remain after full expenditure of the original allocation.

Grant Caps

Grant caps would carry over from the First Tranche.

- The total grant minimum including mitigation is \$10,000.
- The total grant maximum including mitigation is \$150,000.

Funding Priorities

Funding priorities would also modify priorities for First Tranche funding.

- Priority 1: Assist households whose income is less than 80% of the AMI and who are also currently displaced from their home.
- Priority 2: Assist those whose income is less than 80% of the AMI.
- Priority 3: Assist households whose income is between 80% and 120% of the AMI and who are also currently displaced from their home.

- Priority 4: Assist those whose income is 80% to 120%.
- Priority 5: Assist households whose income is above 120% of the AMI and who are also currently displaced from their home.
- Priority 6: Assist those whose income is above 120% of AMI depending on funding availability.

Performance Goal

We anticipate assisting between 30 and 50 households with these additional resources, representing an additional 7.5% of the unmet need.

Owner-Occupied Reimbursement (Completed Rehabilitation including Mitigation, where appropriate)

Allocation: \$11,200,000

Based on the current applications received from First Tranche activity, and supported by additional information gathered as a result of the FEMA Hazard Mitigation Grant Program, it appears that there is significant need for owner-occupied reimbursements, both for completed rehabilitation as well as for completed mitigation.

Grant Caps

- There is no minimum reimbursement level.
- The total grant maximum including mitigation is \$150,000.

Funding Priorities

Funding priorities are proposed for Second Tranche, as follows:

- Priority 1: Reimbursement for completed activity of those whose income is less than 80% of the AMI.
- Priority 2: Reimbursement for completed activity of those whose income is 80% to 120%.
- Priority 3: Reimbursement for completed activity of those whose income is 120% to 150% of AMI.
- Priority 4: Depending on funding availability, reimbursement for completed activity of those whose income is over 150% of AMI.

Performance Goal

We anticipate assisting between 150 and 200 households with these additional resources, representing an additional 33.3% of the unmet need.

Owner-Occupied Mitigation (Mitigation Only activities)

Allocation: \$10,000,000

Based on the current applications received from First Tranche activity, and supported by additional information gathered as a result of the FEMA Hazard Mitigation Grant Program, it appears that there is a significant need for owner-occupied mitigation, including but not limited to elevations, hurricane proofing, and flood management activities.

Grant Caps

- The total grant minimum for mitigation is \$10,000.
- The total grant maximum for mitigation is \$150,000.

Funding Priorities

Funding priorities are proposed for Second Tranche, as follows:

- Priority 1: 100% assistance to those whose income is less than 100% of the AMI.
- Priority 2: Flat reimbursement grant of \$30,000 and a referral to the Shoreline Resiliency Fund to those whose income is 80% to 120%.
- Priority 3: Flat reimbursement grant of \$15,000 and a referral to the Shoreline Resiliency Fund to those whose income is 120% to 150%.

Applicants whose household incomes are in excess of 150% of AMI will be referred to the Shoreline Resiliency Fund. Due to federal limitations, second homes are not eligible for assistance. Any individuals identified as requesting assistance for “second homes” will be referred to the Shoreline Resiliency Fund for potential assistance.

Performance Goal

With these additional resources, we anticipate assisting approximately 80 households in Priority 1; 40 households in Priority 2; and 40 households in Priority 3. This represents 45.6% of the unmet need.

Infrastructure/Infrastructure-related Projects

Allocation: \$30,000,000

In response to the DOH request for information regarding infrastructure and infrastructure-related needs, other state agencies and local governments identified more than fifty projects with urgent needs totaling approximately \$151 million.

A competitive selection process will be used to select projects to be funded.

Grant Caps

There are no grant caps associated with this activity. However, local governments will be required to provide a 25% match toward the total development cost of the activity.

Funding Priorities

Funding priorities are proposed for Second Tranche, to include the following:

- Restoration or replacement of infrastructure damaged as a result of Superstorm Sandy, especially for projects that are vital for the redevelopment of properties damaged as a result of Superstorm Sandy.
- Hardening/mitigation activities related to water or wastewater systems.
- Hardening/mitigation activities related to streets and/or drainage systems.
- Hardening/mitigation of transportation systems and controls.
- Hardening/mitigation of energy systems.
- Other mitigation activities.

All potential infrastructure or infrastructure-related projects must have been identified on or before the 18 month anniversary of Superstorm Sandy, which would allow them to meet the Urgent Need national objective.

By their nature, these infrastructure and infrastructure-related projects meet the criteria for “Urgent Need”:

1. Regional climate change has resulted in a sudden and unexpected need to address these activities;
2. Failure to take on these activities would result in an immediate or future threat to the health and welfare of the community;
3. As previously noted, all potential infrastructure or infrastructure-related projects must have been identified on or before the 18 month anniversary of Superstorm Sandy; and
4. There are currently no other funds available to carry out these activities.

Performance Goal

We anticipate assisting between 10 and 20 infrastructure projects, representing an additional 20% of the unmet need.

Evidence-based Strategies

Allocation: \$ 300,000

DOH is interested in pursuing homeless prevention strategies with strong evidence of impact that, if successfully replicated and scaled, could reduce future demand for government funding. DOH will seek assistance in the implementation of a demonstration project that will attempt to address homeless prevention, with the intention to reduce or eliminate recidivism or chronic homelessness.

Planning for Mitigation/Resiliency

Allocation: \$7,000,000

The State recognizes that future storms may severely damage homes, businesses, infrastructure and public facilities in municipalities throughout Connecticut. It is essential that our infrastructure and public facilities be hardened in anticipation of these events. As indicated in the plan for the First

Tranche, a portion of these Planning funds (\$1,800,000) is being used to assist the State, regional planning agencies, and/or local governments to plan resiliency and mitigation investments. Based on input from other state agencies and local governments, DOH intends to support a coordinated effort to promote consistency in resiliency and mitigation planning across State agencies and local governments, training and capacity building initiatives to promote preparedness, hazard mitigation, and future disaster resilience at the local, regional and state level, and specific studies to coordinated, cost effective long-term resiliency and mitigation investments, including the development of “green” initiatives.

Also, in accordance with the federal guidelines, the State will utilize a portion of these Planning funds to offset the costs incurred to develop the proposed programs and activities through which the Funding will be administered. The State may expend approximately \$150,000 for such costs.

Performance Goal

We anticipate providing between 10 and 20 planning grants, representing 28% of the unmet need.

Administration

Allocation: \$3,300,000

Total administrative fees for CDBG-DR are set by HUD at 5% of the total allocation. In part, this is due to HUD’s recognition that the potential for fraud, waste and abuse is significant with any large federal program based on past experience nationally. As a result, the financial and programmatic requirements for the use, distribution, and monitoring of these funds are stringent. In order to meet these stringent obligations significant staff and administrative resources are necessary to ensure federal compliance.

In addition, there are long term compliance and monitoring requirements associated with the Funding that will require oversight by the State well beyond the period during which program funds may be expended. Specifically, all program funds must be committed to specific projects on or before June 1, 2018. As required in the Federal Notice, all program funds must be fully expended, with all projects completed before March 19, 2019. However, some projects will require compliance monitoring by the State for up to fifteen years beyond 2019. In order to effectively administer the Funding, consistent with these federal requirements, and to ensure that the necessary safe guards are provided, and monitoring processes and procedures are established and followed, the State intends to utilize the full allotment of administrative funds allowed under the Federal Register Notice. However, prior to the commitment date noted above, the State can request that a portion of these funds be reallocated to program activity as necessary and DOH intends to use of these funds for such purpose, if appropriate.

Future Adjustments in Allocations

The State of Connecticut has been keeping track of unmet needs not able to be addressed in either the first or second tranche of funding as a first priority. The state has laid out its priorities for funding in each activity area. DOH will administer the Second Tranche Funds through selective application

processes wherever feasible. The project eligibility requirements contemplated by DOH include the following (though not all requirements will apply to all types of projects):

- Applicants must be “Eligible Applicants” as defined by HUD program regulations as modified by the Federal Register Notice;
- Proposed activity must be an “Eligible Activity” as defined by HUD program regulations as modified by the Federal Register Notice;
- Projects must meet at least one National Objective and such national Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Action Plan must be demonstrated;
- Fair Housing and Equal Opportunity Compliance must be evidenced by a Fair Housing Action Plan that complies with DOH’s guidelines/policies; and
- Applicants must be in compliance with all existing assistance agreements with DOH and cannot be in default under any CHFA or HUD-administered program.

If there are unmet needs identified while the administration of the CDBG-DR is still on-going, those needs will be addressed based on the above criteria and considered for funding. Any additional projects identified will be addressed in a Substantial Amendment.

B. Impact and Unmet Needs Assessment

Housing

Needs Assessment: Owner-Occupied Housing (Rehabilitation & Mitigation)

The highest unmet need in the area of Owner Occupied Housing (Rehabilitation and Mitigation) is rehabilitation resulting from wind and associated damage, followed by damage from flooding. The updated table below provides a breakdown by county of FEMA's Unpaid Losses and Open Claims.

Table 5					
Owner Occupied Properties:					
Unpaid Losses & Open Claims					
Activity	Total Unmet Need	Fairfield Co	New Haven Co	New London Co	Middlesex Co
FEMA Unpaid Losses & Open Claims	\$47,614,320	\$32,774,493	\$5,155,271	\$8,131,588	\$1,552,968
Adjustment for Undercount @ 20%	\$9,552,864	\$6,554,898	\$1,031,054	\$1,626,317	\$310,594
Total Estimated Need	\$57,137,184	\$39,329,391	\$6,186,325	\$9,757,906	\$1,863,561
Requiring Rehabilitation	\$40,277,564	\$32,909,227	\$4,101,499	\$1,726,154	\$1,540,684
Requiring Flood Mitigation	\$16,859,620	\$6,420,165	\$2,084,827	\$8,031,752	\$322,877

Additional unmet need has been identified in the areas of mitigation only and reimbursement.

Thus far, DOH has received 724 applications for CDBG-DR funds related to owner occupied rehabilitation and mitigation. Out of the 724 applications that have been submitted: 140 are under quality assurance review and 584 have been submitted to DOH for program eligibility determination.

To date, DOH staff has reviewed 375 of these applications and has issued 268 program eligibility letters, 33 denial letters, 43 mitigation only letters and has returned 31 applications seeking further clarification. There are currently 209 applications under review of which twelve are mitigation only requests.²

Mitigation only was not funded in the first tranche of funds. The apparent unmet need from existing applications represents at approximately \$4.3 million. In addition, 107 households have submitted \$17.6 million of Hazard Mitigation Grant Program (HMGP) applications to FEMA which have been denied for lack of funds. These HMGP applicants are a priority for both the Units of Local Government and the State. In all, the State estimates at least \$21.9 million in unmet need in the mitigation only priority.

There have been 421 reimbursement requests to DOH from homeowners seeking a total of \$33.6 million in expenses incurred as a result of Hurricane Sandy. Reimbursement only was not funded in the first tranche of funds.

In an effort to collect updated data on unmet needs, the State prepared a survey and circulated it to the Chief Elected Officials, First Selectman, Service Chiefs, and Emergency Management Directors of the municipalities affected by Hurricane Sandy. All responses to the updated unmet needs request and survey forms were required to be submitted by close of business on February 10th, 2014.

Forty-two unmet needs submissions were received by the deadline from eligible municipalities and public housing authorities and additional submissions and supplementary information has continued to be submitted and reviewed. In total, over 190 specific projects with unmet needs in the areas of housing, infrastructure, public facilities, commercial revitalization, and mitigation have been identified by these and other sources and informs the specific funding activity allocations presented in this Action Plan. Input for the development of this Substantial Amendment to the Action Plan was also provided by HUD's Hartford Field Office, FEMA, the LTRWG and its State-led Housing Task Force, the State Office of Housing Preservation, DOT, DECD, OPM, DESPP/DEMHS regional staff, and the American Red Cross and other charitable organizations. The information provided by the municipalities collectively did not contradict the FEMA estimated owner occupied rehabilitation needs. Technical corrections were made based on this information.

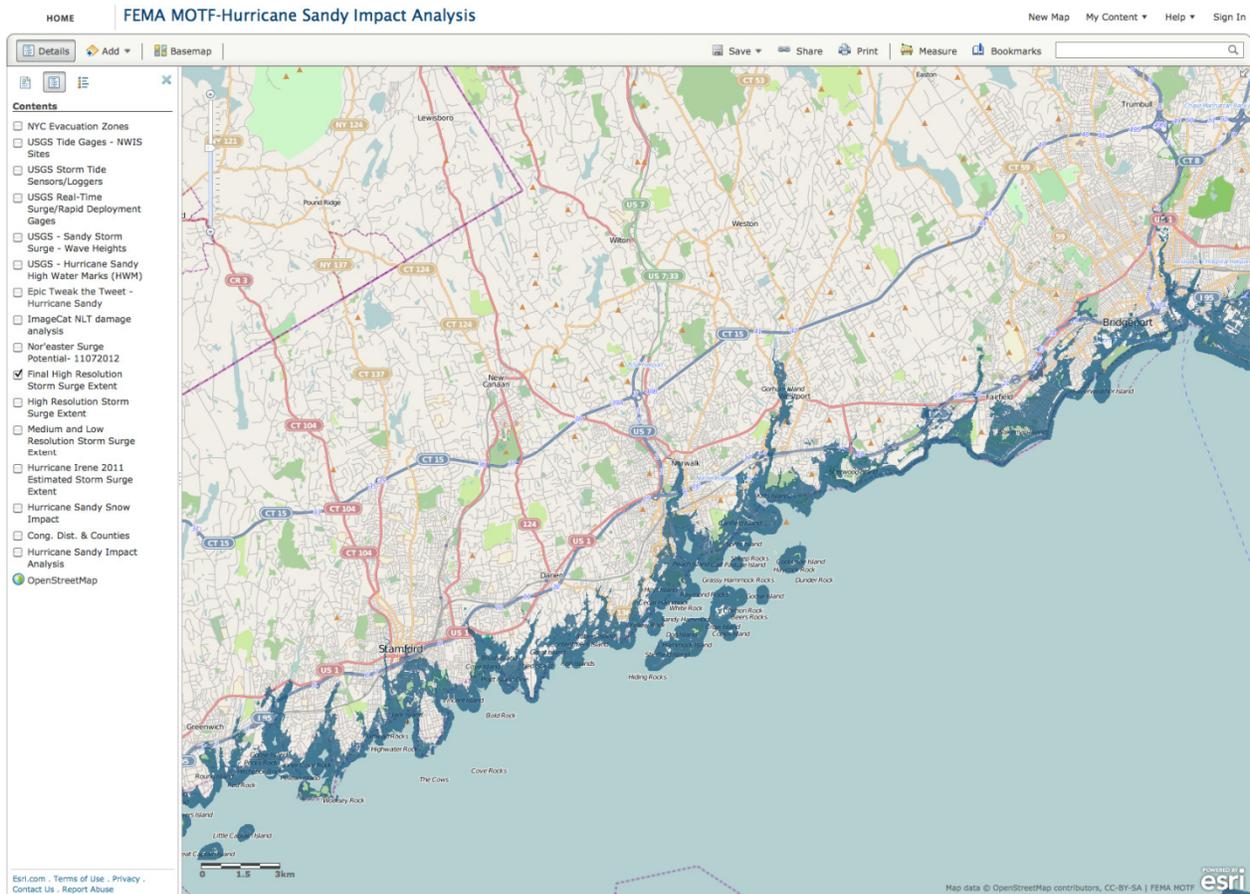
Fairfield County

Fairfield County's damage is largely concentrated in the central, bay-side communities along the Long Island Sound. Norwalk, Westport, Fairfield, Bridgeport, and Stratford account for 81% of Fairfield County's total damaged homes and half of the State's damaged homes. The westerly-most bayside towns of Greenwich, Stamford, and Darien have the second largest volume of damaged homes in Fairfield County, which account for fourteen percent (14%) of Fairfield County's total damage. Concentration of damage in these communities is quite dispersed; only Greenwich has a sizeable share

² As of February 7, 2014

of its damaged homes in neighborhoods with heavy or strong concentrations of damage in a small geographic area.³

The total estimated unmet need for owner-occupied rehabilitation in all municipalities within Fairfield County is \$39.3 million.



Fairfield County as a whole has a poverty rate of 6.1%, below the State’s overall poverty rate of 7.1%.⁴ There are forty-five (45) census tracts within the County that are designated low income.⁵

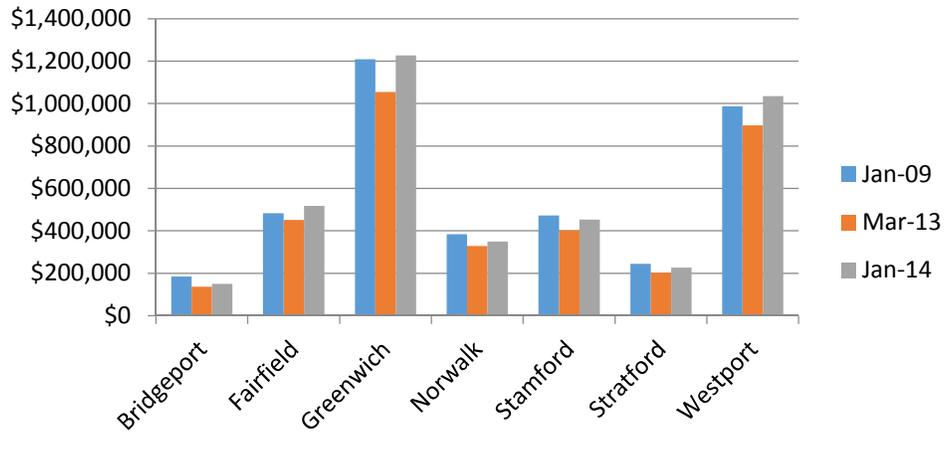
The affected areas within Fairfield County are experiencing a general recovery in the value of homes and a simultaneous decrease in rents. The charts below illustrate the overall condition of the home value market and rental market.

³ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

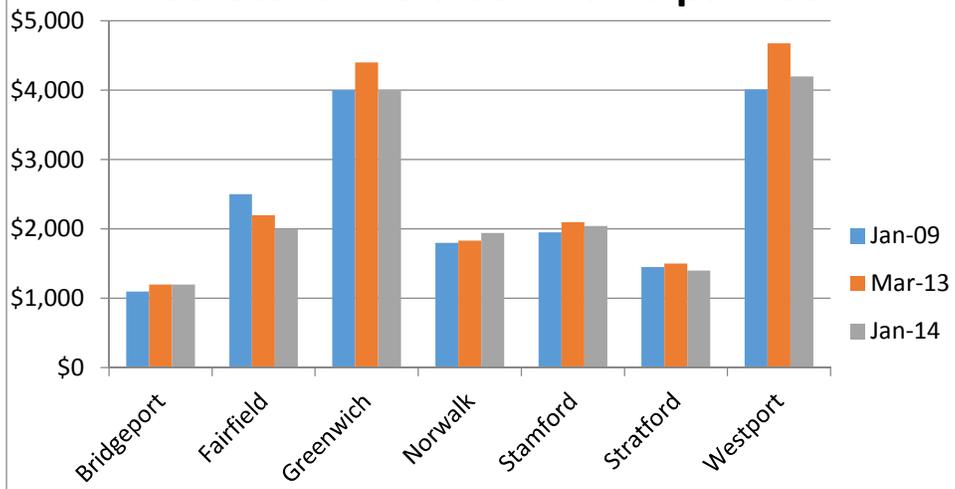
⁴ 2012 American Community Survey 1-Year Estimates: Accessed: February 12, 2014

⁵ Qualified Census Tract Generator (<http://qct.huduser.org/>): February 12, 2014

Median Home Value in Select Fairfield Co. Municipalities

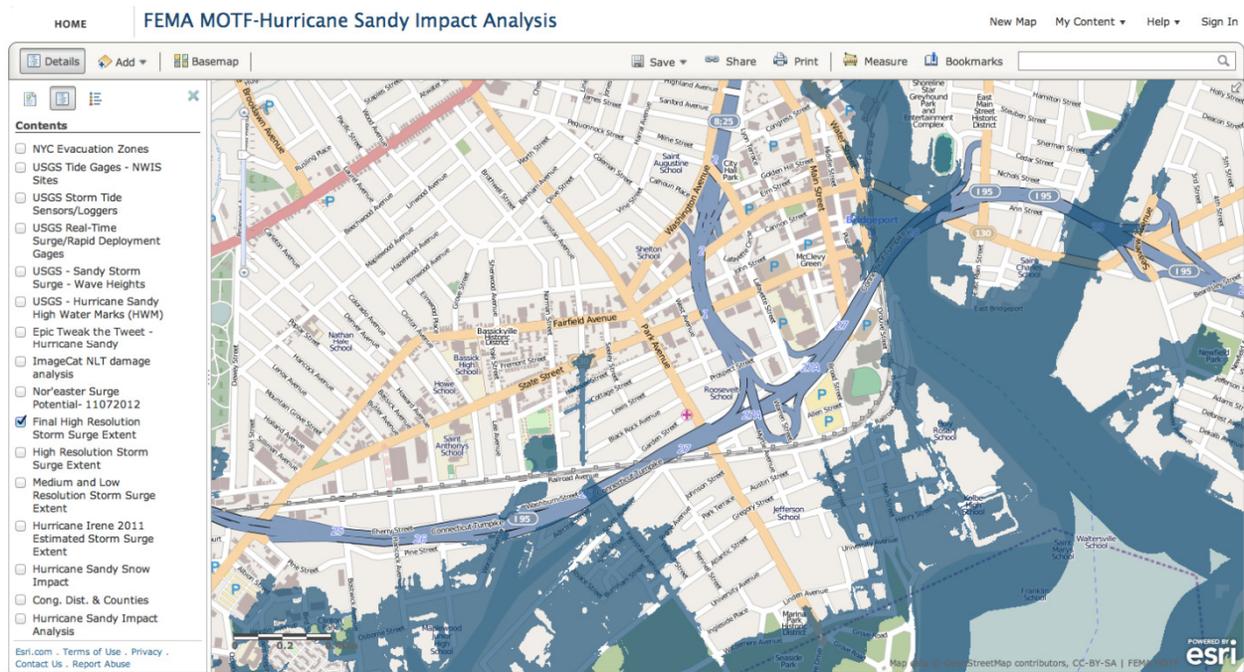


Average Rent in Select Fairfield Co. Municipalities



Specific demographic data has been updated for each of the high impact communities that had over seventy-five homes damaged by Hurricane Sandy. The remaining communities are summarized.

City of Bridgeport



The City of Bridgeport is situated alongside Long Island Sound and numerous neighborhoods are prone to extensive flooding. On October 29, Hurricane Sandy inundated low elevation areas within the City. At the height of the storm, the City was pummeled with sustained 70 mph gale force winds. The combination of the winds, full moon and high tide resulted in Bridgeport recording the State's highest storm surge, nearly 9.8 feet above normal high tide. The storm surge deteriorated the seawall and led to extensive flooding to the majority of the South End. The South End, and more specifically two large housing developments, Marina Village and Seaside Village, which are located in the neighborhood, were especially hard hit. Various other residential and commercial communities situated below South Avenue and to the West of Park Avenue and to the East of Barnum Avenue were also impacted due to the corrosion of the seawall. Besides the South End, Johnson's Creek, a low lying tidal creek in the City's East End, also flooded dramatically as well as sections of the Black Rock neighborhood⁶. Approximately 574 single family homes were affected citywide.⁷

The City of Bridgeport did not identify additional unmet needs in housing in the February 2014 update. The City did indicate the need for a pair of substantial infrastructure projects which will have the impact of mitigating flooded in a number of residential neighborhoods affected by Hurricane Sandy.

⁶ City of Bridgeport Hurricane Sandy Municipal Survey Summary; pg 2

⁷ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

Bridgeport's total population in 2012 was 144,229. Over sixty percent (60.4%) of Bridgeport's population is minority. The largest minority populations are Blacks, with 34.6% of the population followed by Some Other Race at 17.5% and Two or More Races at 4.3% of total population. Over 11 percent (11.1%) of the population is elderly.⁸

Bridgeport's estimated median household income in 2012 was 39,822. The estimated poverty rate for Bridgeport was 19.7%.

Bridgeport's homeownership rate in 2011 was 42.6%.⁹ The current (2014) estimated median house or condo value is \$152,000, up from \$136,200 in January of 2011, and down from \$218,000 in 2009.¹⁰ . The current (2014) average advertised rent is \$1,595 a month, down from \$1,635 a month in January 2011 for a three bedroom, two bath unit.¹¹

Town of Darien

Darien is a 23.4 square mile town situated on Long Island Sound. The neighborhood with the highest overall Hurricane Sandy impact in the town was the Tokeneke neighborhood along the shoreline. At least 76 single family homes were affected in the town.¹²

In the survey completed on February 10th, 2014, the City of Darien has identified a single property which requires elevation at an estimated cost of \$203,607. This property was submitted for a HMPG award which was denied due to lack of funds.

Darien's total population in 2012 was 20,732. Nearly 6 percent (5.9%) of Darien's population is minority. The largest minority populations are Asians and Two or More Races with 3.6% and 1.2 % of the population, respectively. Nearly twenty-two percent (21.7%) of the population is elderly.¹³

⁸ American Community Survey 2008-2012 Five Year Survey

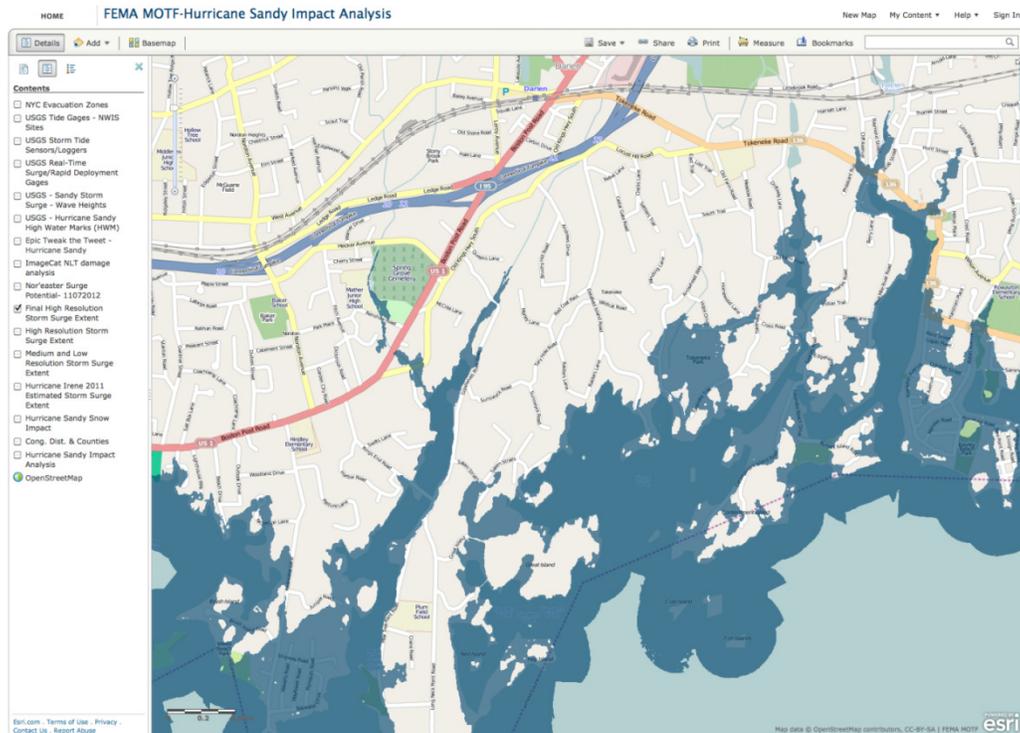
⁹ American Community Survey 2008-2012 Five Year Survey

¹⁰ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Bridgeport-home-value/r_3806/); February 12, 2014

¹¹ Zillow Rent Index Index (http://www.zillow.com/local-info/CT-Bridgeport-home-value/r_3806/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D3806%26el%3D0); February 12, 2014

¹² Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

¹³ American Community Survey 2007-2011 Five Year Survey



Darien’s estimated median household income in 2012 was \$200,724. The estimated poverty rate for Darien was five percent (3.7%).

Darien’s homeownership rate in 2012 was 88.5%¹⁴. The current (2014) estimated median house or condo value is \$1,332,000, up from \$1,218,800 in 2011 and \$1,116,000 in 2009¹⁵. The current (2014) average advertised rent is \$5,931, up from \$5,654 a month in 2011, for a three bedroom, two bath unit.¹⁶

Town of Fairfield

The Town of Fairfield had the largest volume of Hurricane Sandy damaged homes in Fairfield County.¹⁷ At least 893 single family homes were affected in the town.¹⁸

¹⁴ American Community Survey 2007-2011 Five Year Survey

¹⁵ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Darien-home-value/r_11043/); April 29, 2013

¹⁶ Zillow Rent Index (http://www.zillow.com/local-info/CT-Darien-home-value/r_11043/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D11043%26el%3D0) April 29, 2013

¹⁷ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD PD&R; March 7, 2013

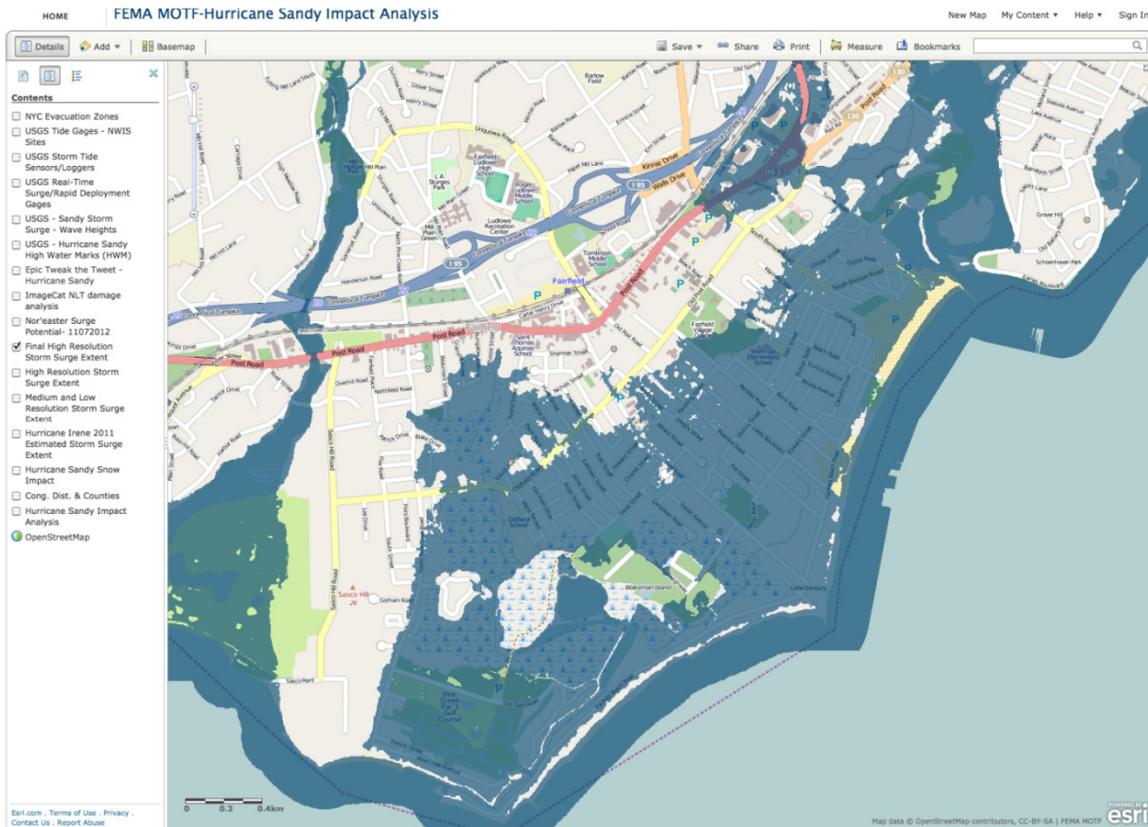
¹⁸ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

Fairfield is a 31.3 square mile town situated on Long Island Sound. Much of the damage to the town was the result of wind and storm surge along the coastal areas and included both primary and secondary homes, particularly within the area between Fairfield Beach and Shoal Point.

In early February 2014, the City updated the housing unmet need. The City of Fairfield identified 26 properties which require elevation at an estimated cost of \$3,841,630. These properties were submitted for a HMPG award which was denied due to a lack of funds.

Fairfield's total population in 2012 was 59,404. Just over eight percent (8.4%) of Fairfield's population is minority. The largest minority populations are Asians with 3.7% of the population followed by Black at 1.8%. Over twenty-six percent (26.5%) of the population is elderly.¹⁹

Fairfield's estimated median household income in 2012 was \$119,924. The estimated poverty rate for Fairfield was 2.4%.



¹⁹ American Community Survey 2008-2012 Five Year Survey



Flood Waters Near Shoal Point, Fairfield, CT (Michael McAndrews; Hartford Courant Oct 30, 2012)

Fairfield's homeownership rate in 2012 was 83%.²⁰ The current (2014) estimated median house or condo value is \$517,900, up from \$450,100 in 2011 and down from \$521,000 in 2009.²¹ The current (2014) average advertised rent is \$2,793 up from \$2,638 in 2011 a month for a three bedroom, two bath unit.²²

Town of Greenwich

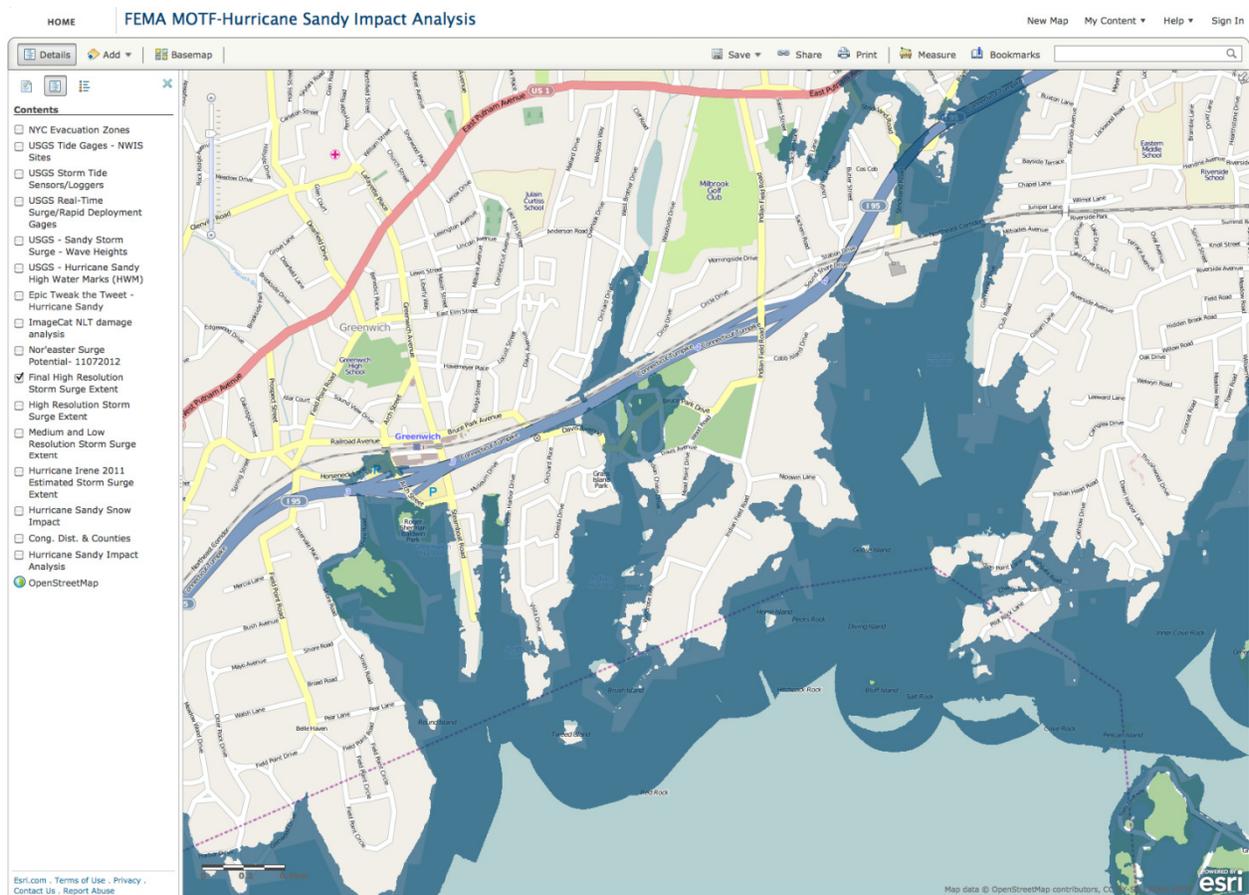
Greenwich is a 62.7 square mile town situated on Long Island Sound. The neighborhood with the highest overall Hurricane Sandy impact in the Town was historic Old Greenwich, which is located on the coastline, including the complete destruction of three waterfront homes on the neighborhood's Binney Lane by a fire spread by the storm's strong winds. At least 176 single family homes were affected in the town.²³

²⁰ American Community Survey 2008-2012 Five Year Survey

²¹ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Fairfield-home-value/r_31506/); February 12, 2014

²² Zillow Rent Index (http://www.zillow.com/local-info/CT-Fairfield-home-value/r_31506/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D31506%26el%3D0); February 12, 2014

²³ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013



In early February 2014, the City updated the housing unmet need. The City of Greenwich identified 26 properties which require elevation at an estimated cost of \$6,363,123. These properties were submitted for a HMPG award which was denied due to a lack of funds.

Greenwich's estimated population in 2012 was 61,171. Over thirteen percent (13.3%) of Greenwich's population is minority. The largest minority populations are Asians, Some Other Race and Blacks with 6.6%, 2.4%, and 2.1% of the population, respectively. Twenty-two percent (22.2%) of the population is elderly.²⁴

Greenwich's estimated median household income in 2012 was \$129,588. The estimated poverty rate for Greenwich was above two percent (2.3%).

Greenwich's homeownership rate in 2012 was 67.1%, down from 80.5% in 2012.²⁵ The current (2014) estimated median house or condo value is \$1,226,400, up from \$1,054,900 in 2011 and down from

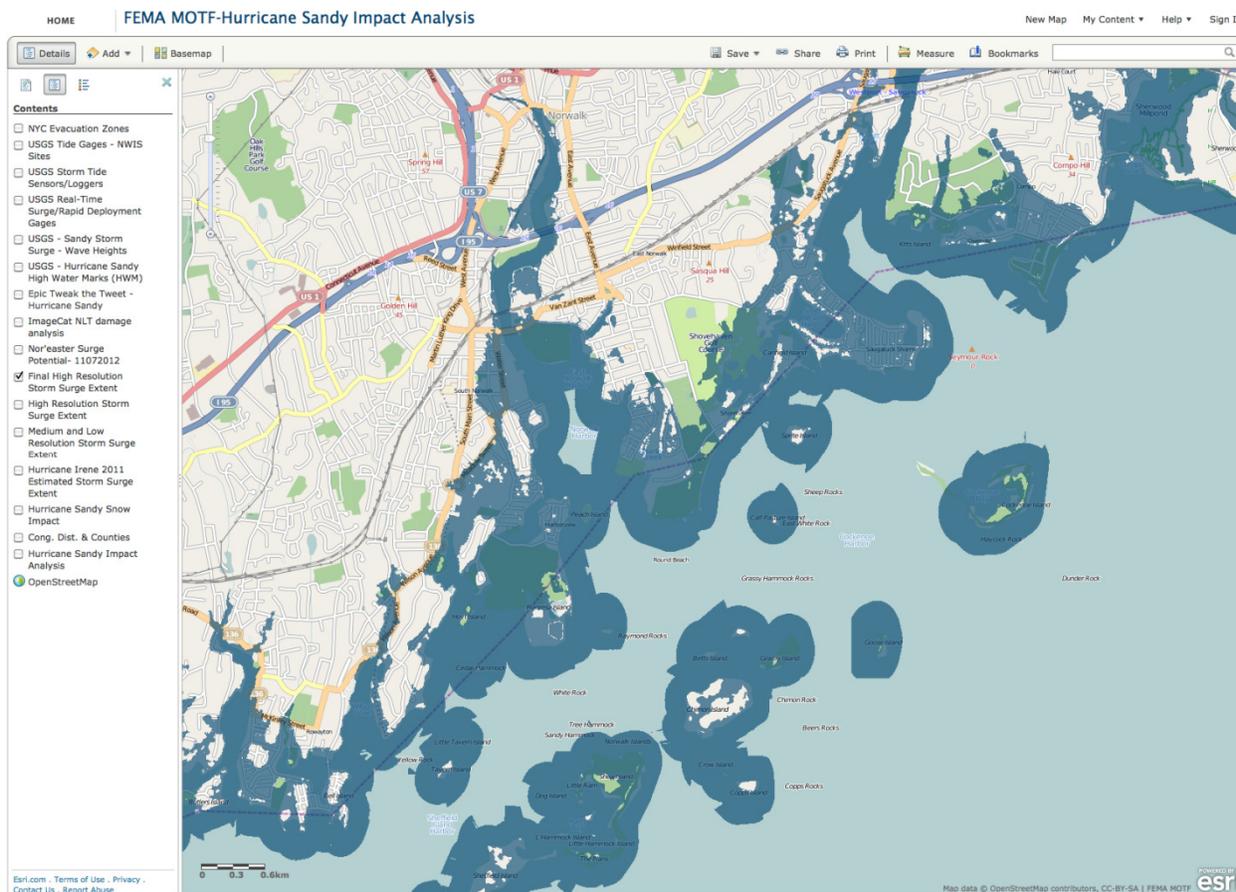
²⁴ American Community Survey 2007-2011 Five Year Survey

²⁵ American Community Survey 2007-2011 Five Year Survey

\$1,250,000 in 2009.²⁶ The current (2014) average advertised rent is \$5,580, up from \$5,014 a month in 2011 for a three bedroom, two bath unit.²⁷

City of Norwalk

Norwalk is a 36.3 square mile city situated on Long Island Sound. The neighborhoods with the highest overall Hurricane Sandy impact in the city included Bell Island, Rowayton and Shore Haven neighborhoods. At least 544 single family homes were affected in the town.²⁸



²⁶ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Greenwich-home-value/r_45565/) February 12, 2014

²⁷ Zillow Rent Index (http://www.zillow.com/local-info/CT-Greenwich-home-value/r_45565/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D45565%252C411767%26el%3D0); February 12, 2014

²⁸ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

Norwalk's total population in 2012 was 85,603. Twenty-four percent (31%) of Norwalk's population is minority. The largest minority populations are Blacks and Asians with 14.2% and 4.8% of the population, respectively. Eighteen percent (18.1%) of the population is elderly.²⁹



Norwalk Damage (USA Today; Oct 31, 2012)

Norwalk's estimated median household income in 2012 was \$75,446. The estimated poverty rate for Norwalk was above six percent (6.4%).

Norwalk's homeownership rate in 2012 was 62.4%.³⁰ The current (2014) estimated median house or condo value is \$348,800, up from \$327,600 in 2011 and down from \$384,000 in 2009.³¹ The current (2014) average advertised rent is \$2,373 a month up from \$2,317 a month in 2011 for a three bedroom, two bath unit.³²

City of Stamford

Stamford is a 52.1 square mile city situated on Long Island Sound. The neighborhoods with the highest overall Hurricane Sandy impact in the City included Shippan Point, Cove and Southfield Point. Stamford's West Beach, Quigley Beach, Cove Island Park and Cummings Marina suffered millions of dollars' worth of damage. At least 166 single family homes were affected in the city.³³

²⁹ American Community Survey 2007-2012 Five Year Survey

³⁰ American Community Survey 2008-2012 Five Year Survey

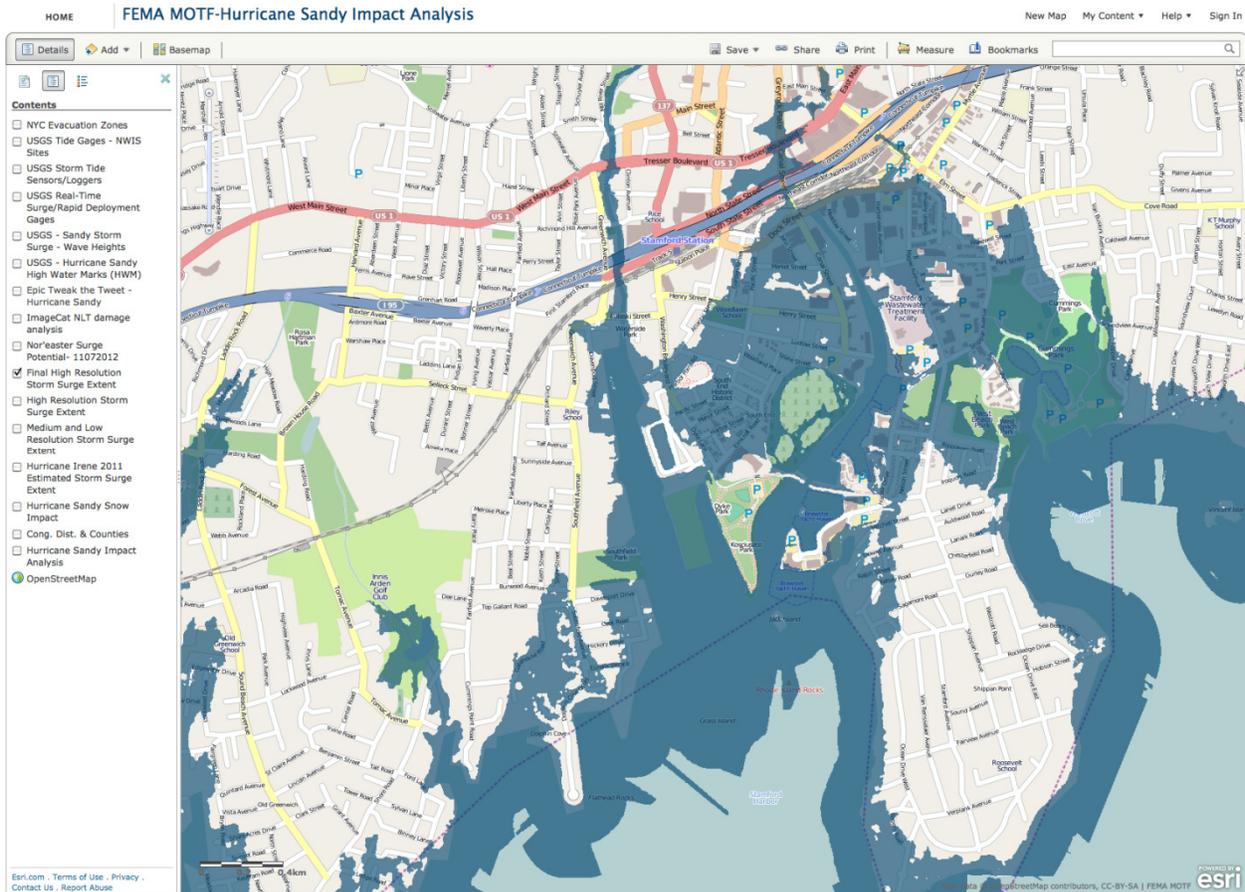
³¹ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Norwalk-home-value/r_26222/); February 12, 2014

³² Zillow Rent Index (http://www.zillow.com/local-info/CT-Fairfield-home- http://www.zillow.com/local-info/CT-Norwalk-home-value/r_26222/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D26222%26el%3D0); February 12, 2014

³³ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

Stamford’s total population in 2012 was 122,643. Thirty-nine percent (39.4%) of Stamford’s population is minority. The largest minority populations are Other, Blacks and Asians with 15.2%, 14.3%, and 7.8% of the population, respectively. Over sixteen percent (16.6%) of the population is elderly.³⁴

Stamford’s estimated median household income in 2012 was \$76,297, down from \$78,201 in 2011. The estimated poverty rate for Stamford was nearly eight percent (7.9%).



Stamford’s homeownership rate in 2012 was 55.3%.³⁵ The current (2014) estimated median house or condo value is \$452,400, up from \$402,000 in 2011 and down from \$473,000 in 2009.³⁶ The current

³⁴ American Community Survey 2008-2012 Five Year Survey

³⁵ American Community Survey 2008-2012 Five Year Survey

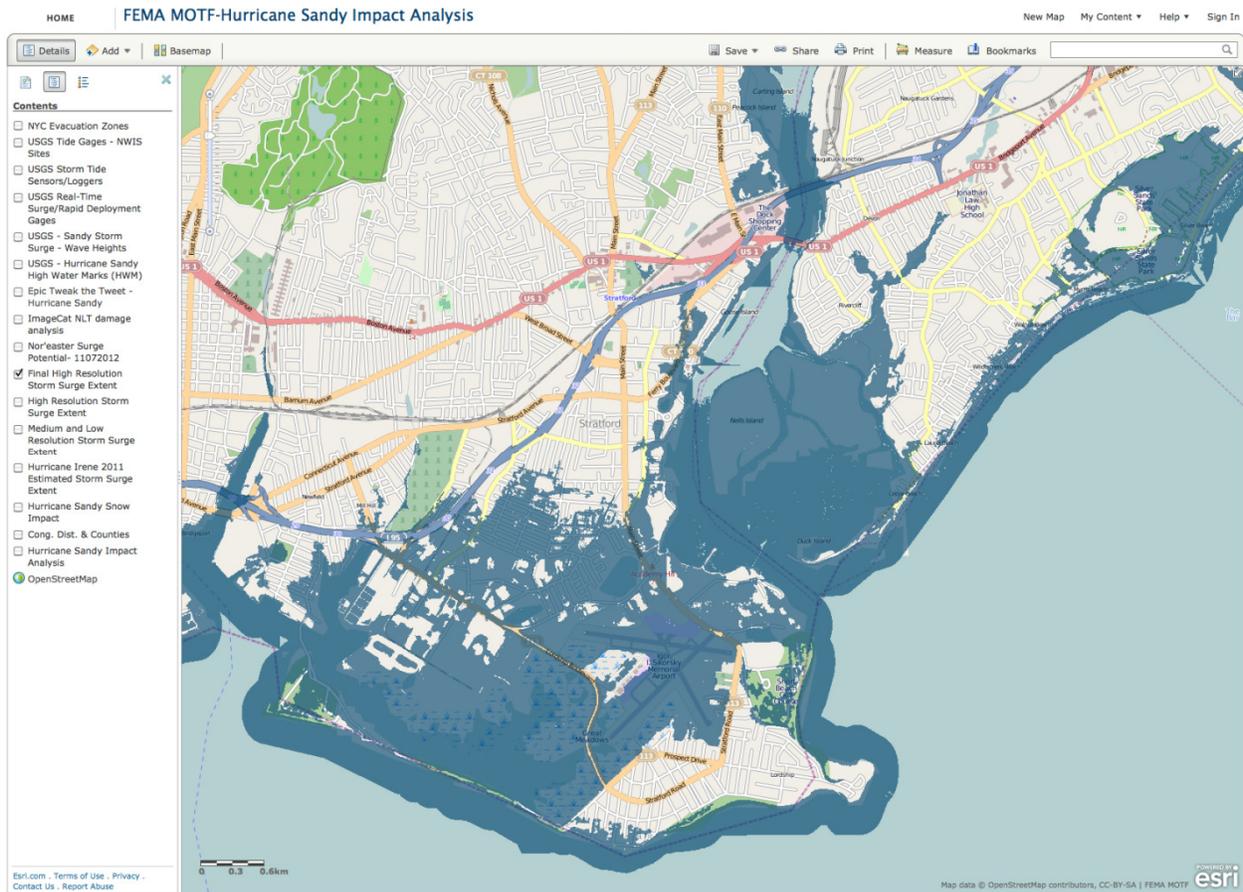
³⁶ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

(2014) average advertised rent is \$2,672 a month, up from \$2,647 a month in 2011 for a three bedroom, two bath unit.³⁷

Town of Stratford

Stratford is a 19.9 square mile city situated on Long Island Sound. At least 96 single family homes were affected in the town.³⁸

Stratford's total population in 2012 was 51,384. Nearly twenty-two percent (21.8%) of Stratford's population is minority. The largest minority populations are Blacks and Asians with 13.3% and 3.7% of the population, respectively. Over twenty-three percent (23.3%) of the population is elderly.³⁹



³⁷ Zillow Rent Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

³⁸ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

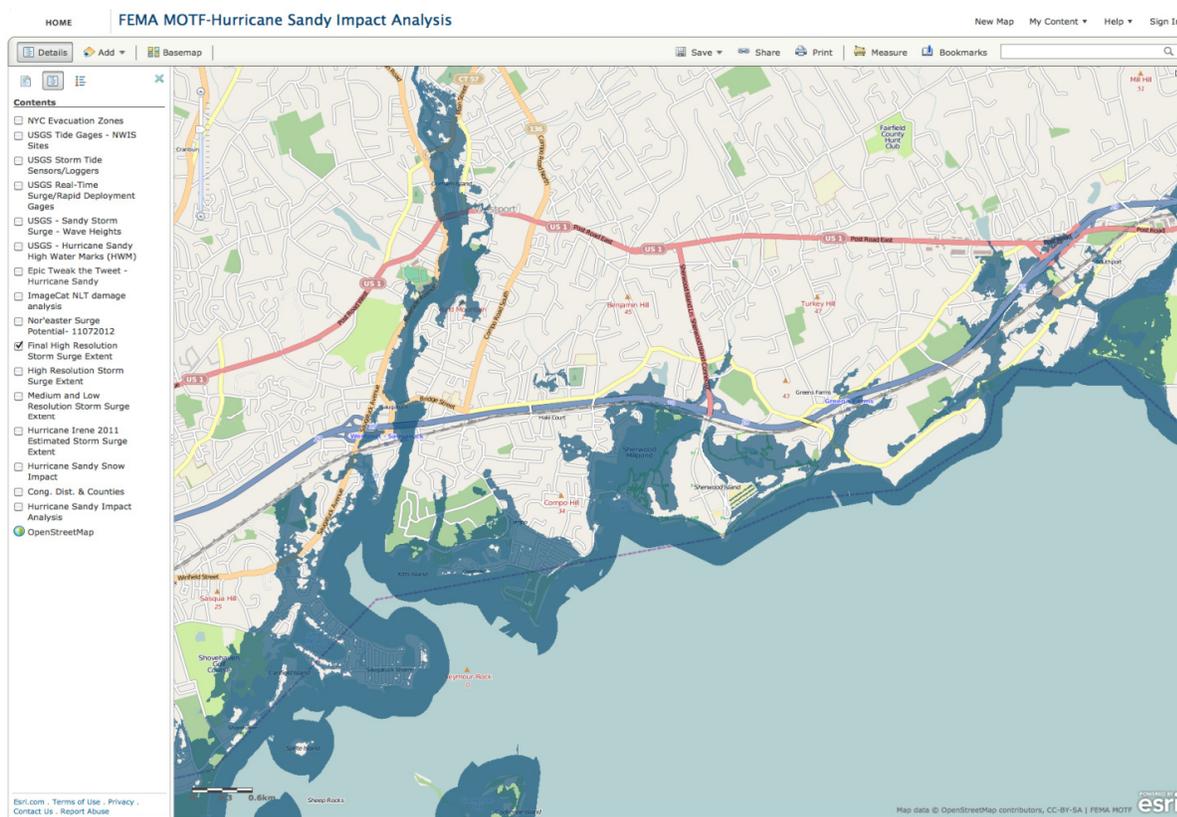
³⁹ American Community Survey 2008-2012 Five Year Survey

Stratford's estimated median household income in 2012 was \$67,375. The estimated poverty rate for Stratford was approximately four percent (3.9%).

Stratford's homeownership rate in 2012 was 80.4%.⁴⁰ The current (2014) estimated median house or condo value is \$223,600, up from \$202,000 in 2011 and down from \$245,000 in 2009.⁴¹ The current (2014) average advertised rent is \$1,771, down slightly from \$1,798 a month in 2011 for a three bedroom, two bath unit.⁴²

Town of Westport

Westport is a 33.3 square mile town situated on Long Island Sound. The neighborhoods with the highest overall impact in the town were the waterfront neighborhoods of Saugatuck Shores, Old Mill and Compo Beach. At least 243 single family homes were affected in the town.⁴³



⁴⁰ American Community Survey 2008-2012 Five Year Survey

⁴¹ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

⁴² Zillow Rent Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

⁴³ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

In early February 2014, the City updated the housing unmet need. The City of Westport identified 24 properties which require elevation at an estimated cost of \$4,673,940. These properties were submitted for a HMPG award which was denied due to a lack of funds.

Westport’s total population in 2012 was 26,391. Eight percent (8.5%) of Westport’s population is minority. The largest minority populations are Asians and Two or More Races with 4.3% and 1.7% of the population, respectively. Twenty-one percent (22.4%) of the population is elderly.⁴⁴

Westport’s estimated median household income in 2012 was \$152,556, down from \$155,792 in 2011. The estimated poverty rate for Westport was nearly three percent (2.7%).

Westport’s homeownership rate in 2012 was 86.2%.⁴⁵ The current (2014) estimated median house or condo value is \$1,035,100, up from \$898,500 in 2011 from \$and 987,000 in 2009.⁴⁶ The current (2014) average advertised rent is \$4,998 up from \$4,750 a month in 2011 for a three bedroom, two bath unit.⁴⁷

Balance of Fairfield County

A total of six other municipalities in Fairfield County suffered damage to 85 housing units. Summary demographic data for each is provided in the table below.

<i>Additional Towns: Fairfield County</i>									
Town	Damaged Homes	Population	Racial/Ethnic Minority	Elderly	Median Income	Poverty Rate	Home Ownership	Current Median Home Value	Current Average Rent
Danbury	25	80,893	30.1%	16.6%	\$66,281	6.9%	61.8%	\$245,400	\$1,866
Ridgefield	14	24,638	5.4%	19.1%	\$111,083	1.6%	82.4%	\$603,500	\$3,243
Weston	12	10,179	6.8%	15.7%	\$213,423	2.5%	93.2%	\$809,800	\$3,963
New Canaan	12	19,738	6.6%	20.1%	\$167,037	1.5%	81.0%	\$1,268,200	\$5,679
Trumbull	12	36,018	9.4%	23.9%	\$108,667	0.7%	89.5%	\$351,900	\$2,227
Newtown	10	27,560	9.1%	18.1%	\$116,024	2.3%	91.9%	\$382,400	\$2,362

⁴⁴ American Community Survey 2008-2012 Five Year Survey

⁴⁵ American Community Survey 2008-2012 Five Year Survey

⁴⁶ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); April 29, 2013

⁴⁷ Zillow Rent Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); April 29, 2013

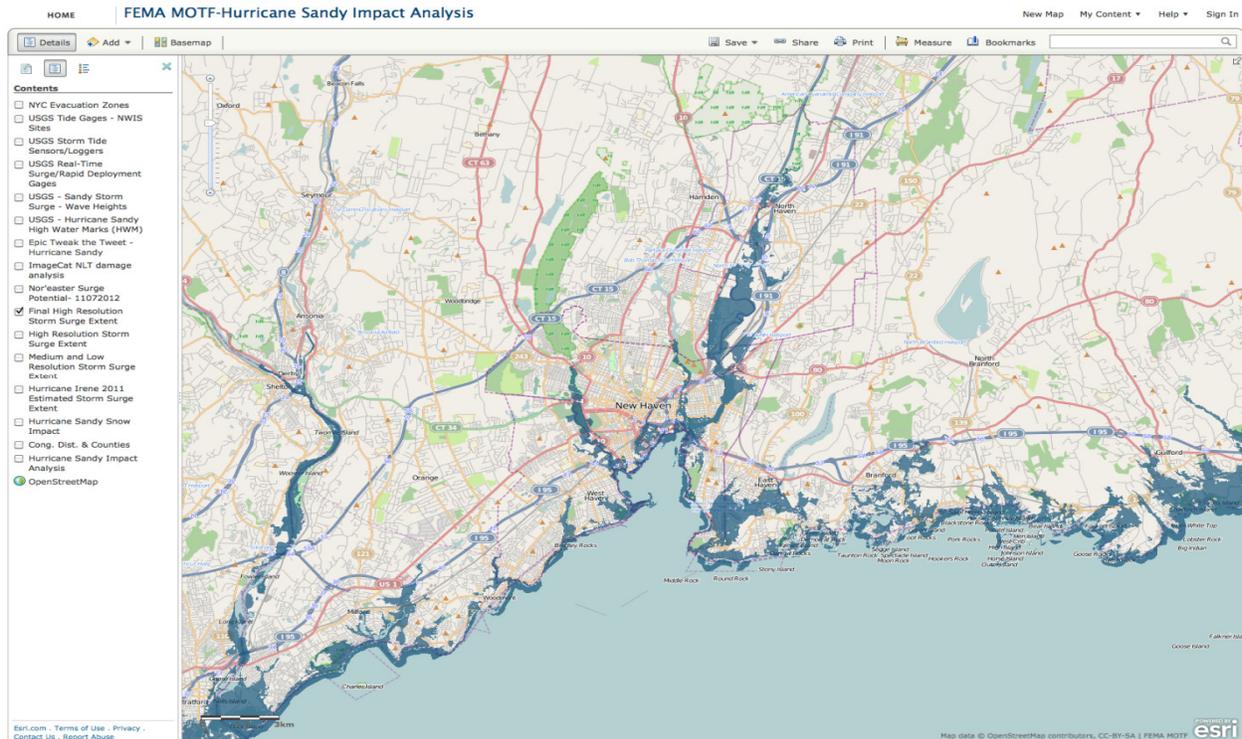
Applications from homeowners from each of these municipalities may apply for funding under the CDBG-DR owner-occupied rehabilitation program if, like applications from homeowners elsewhere in the eligible jurisdictions, they meet all eligibility criteria, including, for example, the regulatory requirements set forth in the Federal Register Notice.

New Haven County

More than half of all damaged homes in New Haven County are located within the City of Milford. The collection of communities around the New Haven Harbor (West New Haven, East New Haven, and New Haven) account for slightly more than a quarter of New Haven’s damaged homes. Damage in these communities is dispersed throughout neighborhoods. The concentration of flooding in these towns (i.e. West New Haven, East New Haven, and New Haven) was modest, as they only account for 17% of the county’s homes that were inspected and found to have had more than four feet of flooding.

The other coastal towns of Branford, Guilford and Madison have another 10% of this county’s damaged homes. The vast majority of damaged homes in these areas had flood depths less than four feet.

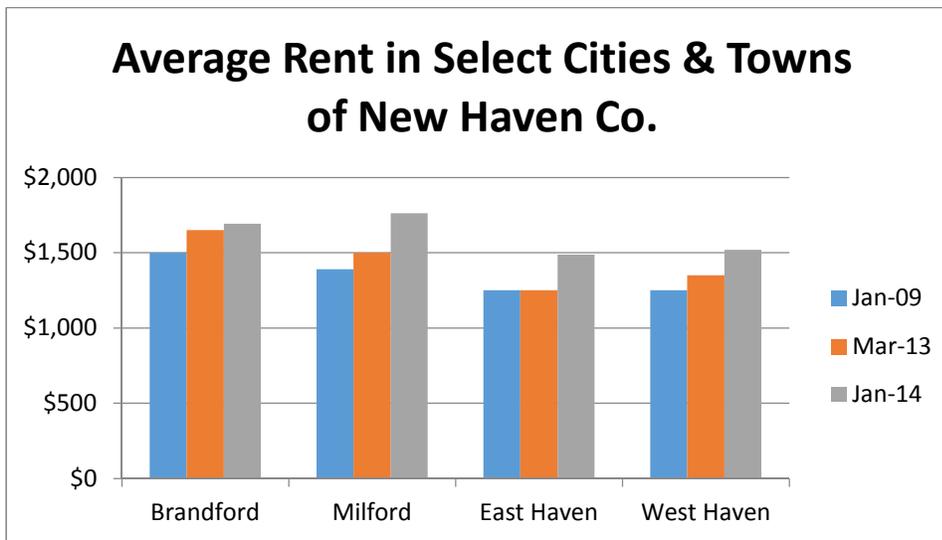
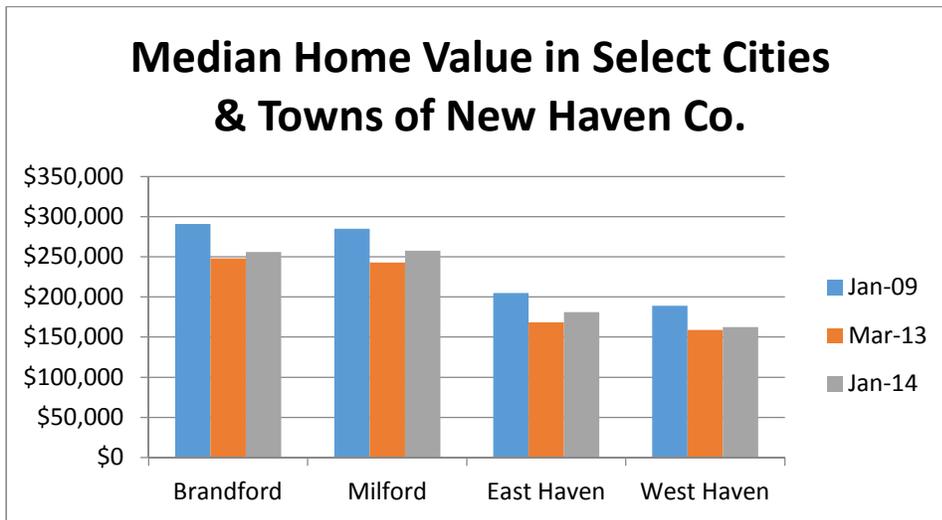
The inland portions of New Haven County experienced very little damage from Hurricane Sandy. Only Waterbury and Hamden had some damage, mostly located in low-lying areas.⁴⁸



⁴⁸ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

The total population of New Haven County in 2012 was 862,477. New Haven County as a whole has a poverty rate of 11.4%, which is greater than the State’s overall poverty rate of 10.4%⁴⁹. There are forty-two census tracts within the county that are designated low income.⁵⁰

The affected areas within New Haven County are experiencing a rebound in the value of homes and a simultaneous increase in rents. The charts below illustrate the overall condition of home value market and rental market in New Haven County by affected cities and towns.



⁴⁹ 2011 American Community Survey 1-Year Estimates

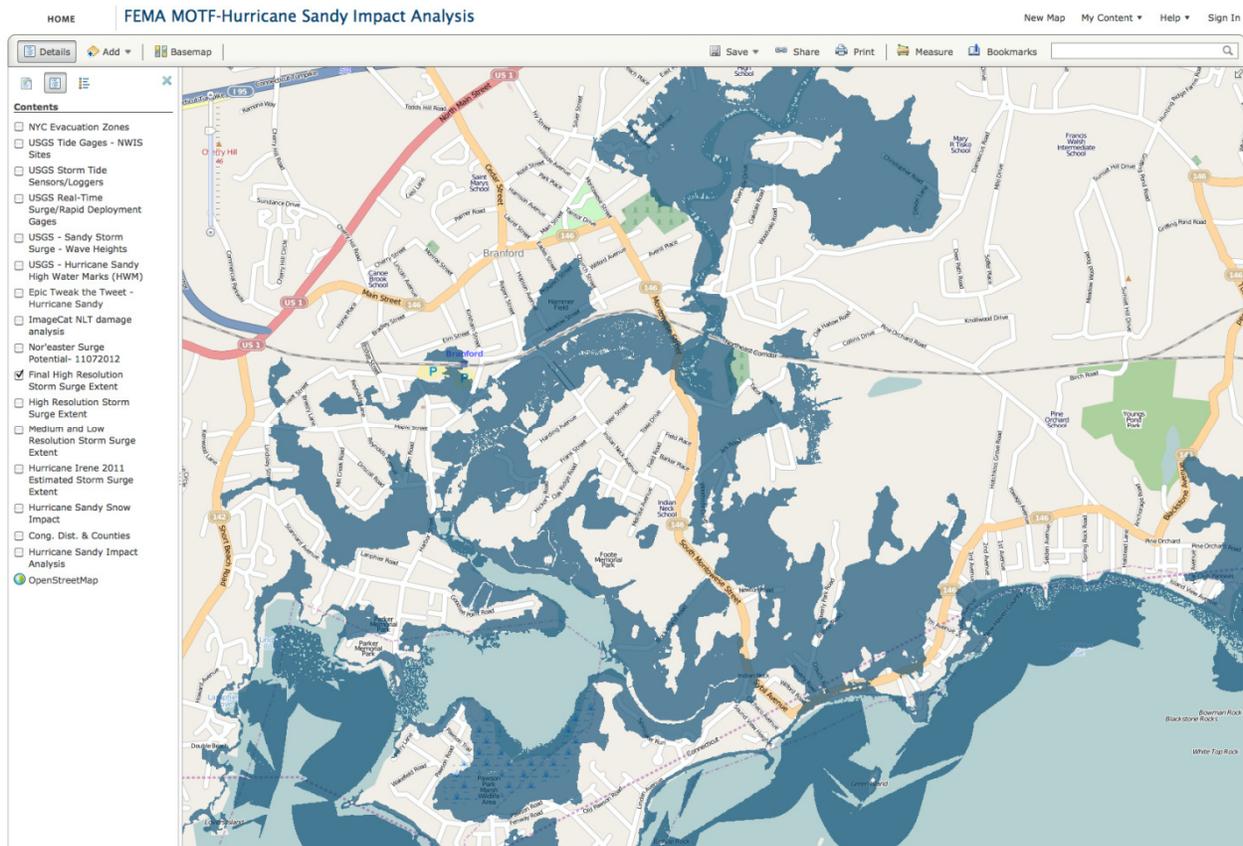
⁵⁰ Qualified Census Tract Generator (<http://qct.huduser.org/>): April 15, 2013

Specific demographic data has been assembled for each of the high impact communities that had over seventy-five homes damaged by Hurricane Sandy. The remaining communities are summarized.

The original total estimated unmet need for homeowner rehabilitation in all municipalities within New Haven County was \$6.2 million.

Town of Branford

Branford is a 28 square mile town situated on Long Island Sound. The neighborhoods with the highest overall Hurricane Sandy impact in the town included the Stony Creek and Short Beach neighborhoods. At least 77 single family homes were affected in the town.⁵¹



Branford's total population in 2011 was 28,026. Nearly nine percent (8.9%) of Branford's population is minority. The largest minority populations are Asians, Other, and Blacks with 4.6%, 1.8%, and 1.7% of the population, respectively. Nearly Twenty-nine percent (28.7%) of the population is elderly.⁵²

⁵¹ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

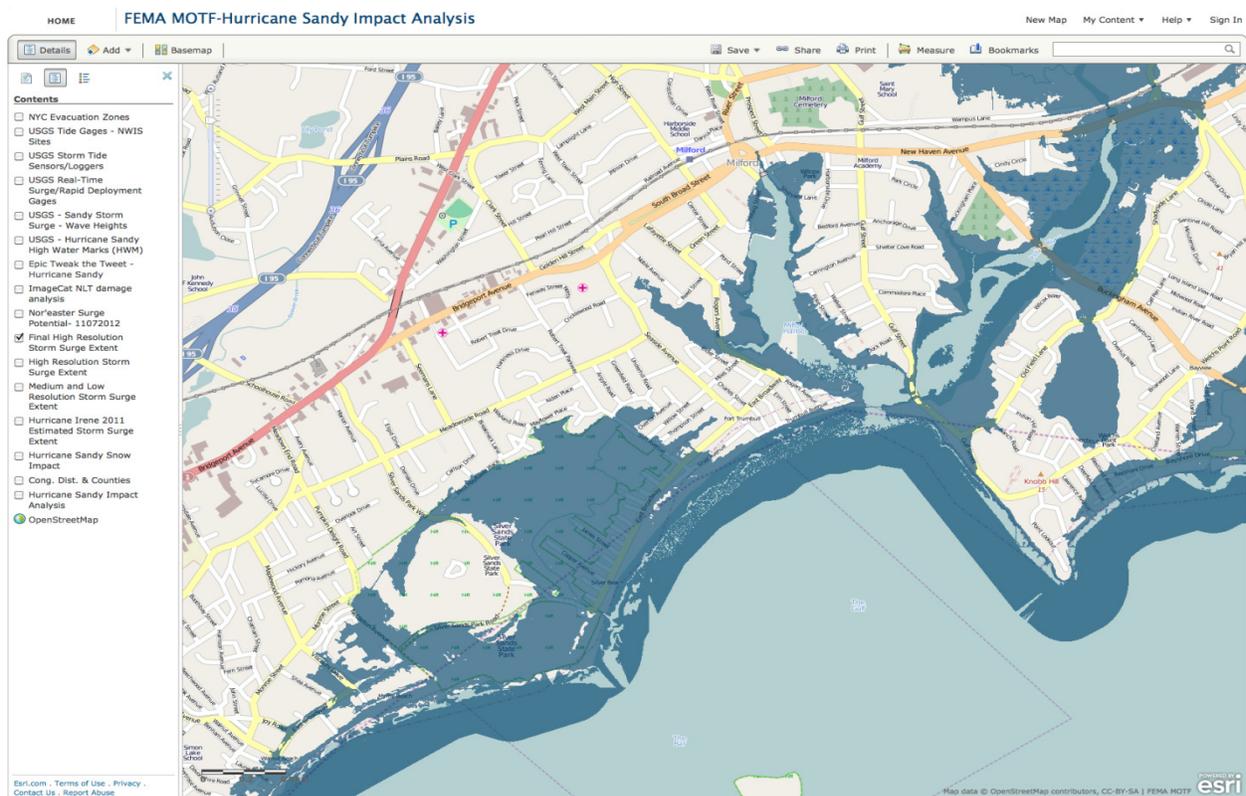
⁵² American Community Survey 2008-2012 Five Year Survey

Branford’s estimated median household income in 2012 was \$70,075. The estimated poverty rate for Branford was four percent (4.3%).

Branford’s homeownership rate in 2012 was 71.2%.⁵³ The current (2014) estimated median house or condo value is \$256,100, up from \$248,100 in 2011 and down from \$291,000 in 2009.⁵⁴ The current (2014) average advertised rent is \$1,692, down from \$1,760 in 2011 a month for a three bedroom, two bath unit.⁵⁵

City of Milford

Milford contains over half the homes damaged in the county and the only neighborhoods in the county where more than twenty percent (20%) of the housing stock was damaged. Eighty percent (80%) of the county’s homes that were flooded with more than four feet of water are located in Milford.



⁵³ American Community Survey 2008-2012 Five Year Survey

⁵⁴ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Branford-home-value/r_397516/); February 12, 2014

⁵⁵ Zillow Rent Index (http://www.zillow.com/local-info/CT-Branford-home-value/r_397516/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D397516%252C37550%26el%3D0); April 29, 2013

Milford is a 26.1 square mile town situated on Long Island Sound. Milford has a fourteen mile long coastline. The areas with the highest overall Hurricane Sandy impact were the East Broadway and Silver Sands neighborhoods. At least 669 single family homes were affected in the town.⁵⁶

In early February 2014, the City updated the housing unmet need. The City of Milford identified 28 properties which require elevation at an estimated cost of \$2,469,709. These properties were submitted for a HMPG award which was denied due to a lack of funds.

Milford's total population in 2012 was 52,759. Almost twelve percent (11.6%) of Milford's population is minority. The largest minority populations are Asians, Blacks and Other with 6.1%, 2.3%, and 1.8% of the population, respectively. Over twenty-two percent (22.2%) of the population is elderly.⁵⁷

Milford's estimated median household income in 2011 was \$79,531. The estimated poverty rate for Milford was nearly four percent (3.2%).

Milford's homeownership rate in 2011 was 77.2%.⁵⁸ The current (2014) estimated median house or condo value is \$257,500 up from \$242,900 in 2011 and down from \$268,000 in 2009.⁵⁹ The current (2014) average advertised rent is \$1,763 a month for a three bedroom, two bath unit.⁶⁰

City of East Haven

East Haven is a 13.4 square mile city situated on Long Island Sound. The neighborhood with the highest overall impact in the city was the area along Cosey Beach. At least 155 single family homes were affected in the city.⁶¹

In early February 2014, the City updated the housing unmet need. The City of East Haven identified 1 property which requires elevation at an estimated cost of \$49,125. The property was submitted for a HMPG award which was denied due to a lack of funds.

East Haven's total population in 2012 was 29,257. Nearly ten percent (9.6%) of East Haven's population is minority. The largest minority populations are Blacks, Asians, and Other with 3.3%, 2.6%, and 1.9% of the population, respectively. Twenty-two percent (22.1%) of the population is elderly.⁶²

⁵⁶ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

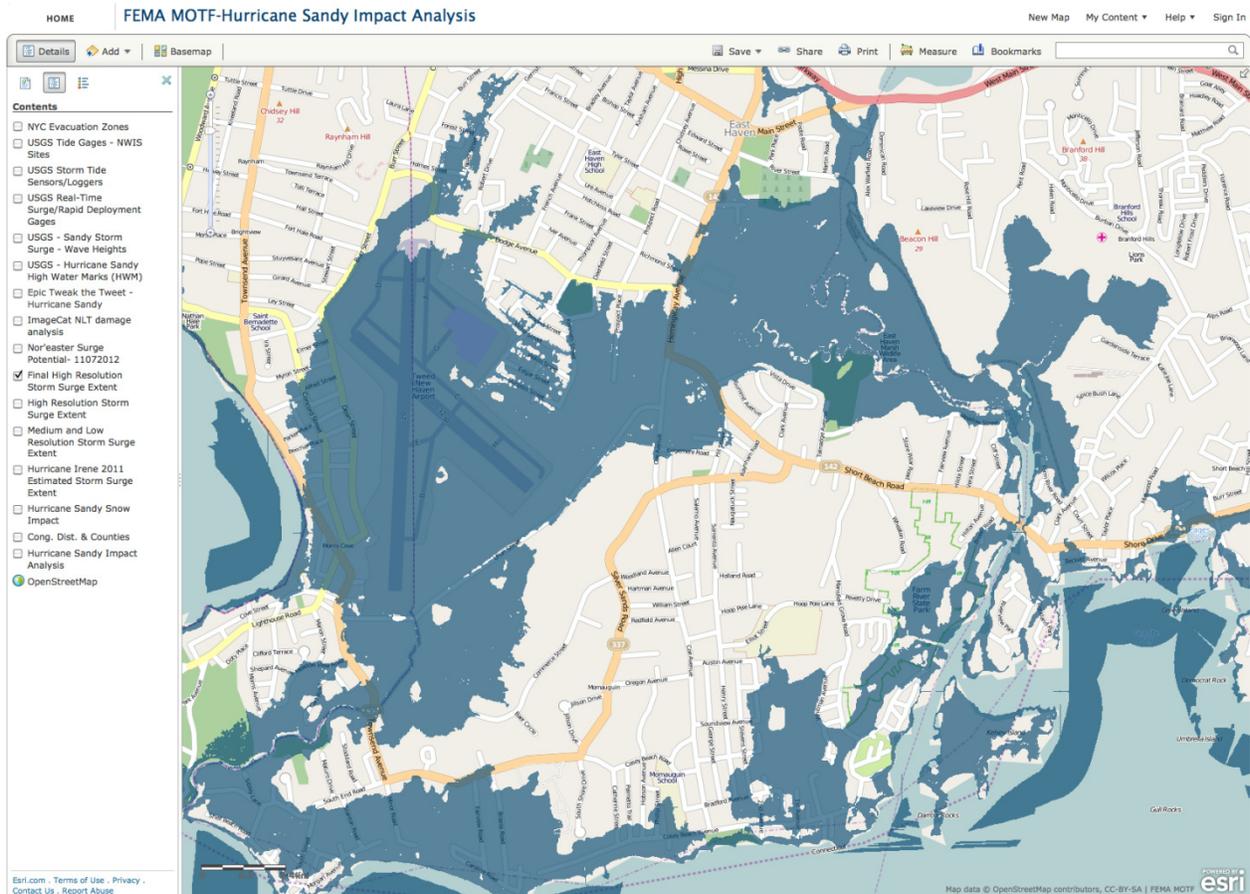
⁵⁷ American Community Survey 2008-2012 Five Year Survey

⁵⁸ American Community Survey 2008-2012 Five Year Survey

⁵⁹ Zillow Home Value Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

⁶⁰ Zillow Rent Index (http://www.zillow.com/local-info/CT-Stratford-home-value/r_14016/); February 12, 2014

⁶¹ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013



East Haven’s estimated median household income in 2012 was \$63,574. The estimated poverty rate for East Haven was eight percent (8.1%).

East Haven’s homeownership rate in 2011 was 73.9%.⁶³ The current (2014) estimated median house or condo value is \$181,200, up from \$168,200 in 2011 and down from \$205,000 in 2009.⁶⁴ The current (2014) average advertised rent is \$1,447 a month for a three bedroom, two bath unit.⁶⁵

City of West Haven

⁶² American Community Survey 2008-2012 Five Year Survey

⁶³ American Community Survey 2008-2012 Five Year Survey

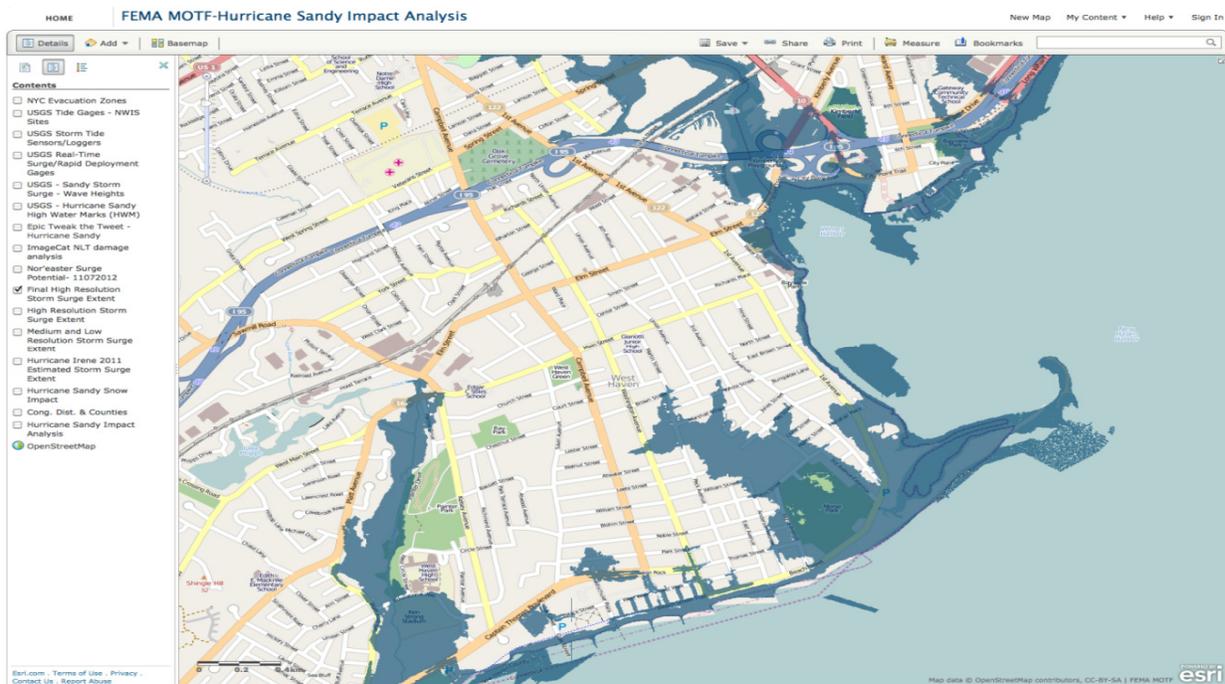
⁶⁴ Zillow Home Value Index (http://www.zillow.com/local-info/CT-East-Haven-home-value/r_4474/); February 12, 2014

⁶⁵ Zillow Rent Index (http://www.zillow.com/local-info/CT-East-Haven-home-value/r_4474/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D4474%26el%3D0); February 12, 2014

West Haven is an 11 square mile city situated on Long Island Sound. At least 126 single family homes were affected in the city.⁶⁶

West Haven's total population in 2012 was 55,564. Thirty percent (30.1%) of West Haven's population is minority. The largest minority populations are Blacks and Asians, with 19.7% and 3.9% of the population, respectively. Nineteen percent (19%) of the population is elderly.⁶⁷

West Haven's estimated median household income in 2012 was \$51,911. The estimated poverty rate for West Haven was ten percent (10%).



West Haven's homeownership rate in 2012 was 55.7%.⁶⁸ The current (2014) estimated median house or condo value is \$162,300, up from \$159,000 in 2011 and down from \$189,000 in 2009.⁶⁹ The current (2014) average advertised rent is \$1,520 up from \$1,510 a month in 2011 for a three bedroom, two bath unit.⁷⁰

⁶⁶ Analysis of Communities Impacted by Hurricane Sandy in Connecticut; HUD: PD&R; March 7, 2013

⁶⁷ American Community Survey 2008-2012 Five Year Survey

⁶⁸ American Community Survey 2008-2012 Five Year Survey

⁶⁹ Zillow Home Value Index (http://www.zillow.com/local-info/CT-West-Haven-home-value/r_27864/); February 12, 2014

⁷⁰ Zillow Rent Index (http://www.zillow.com/local-info/CT-East-Haven-home-value/r_4474/#metric=mt%3D50%26dt%3D1%26tp%3D5%26rt%3D8%26r%3D4474%26el%3D0); April 29, 2013

Balance of New Haven County

A total of five other municipalities in New Haven County reported damage to 145 housing units. Summary demographic data for each is provided in the table below.

<i>Additional Towns: New Haven County</i>									
Town	Damaged Homes	Population	Racial/Ethnic Minority	Elderly	Median Income	Poverty Rate	Home Ownership	Current Median Home Value	Current Average Rent
New Haven	58	129,779	54.4%	13.3%	\$38,482	21.8%	30.8%	\$166,200	\$1,478
Guilford	38	22,275	5.0%	27.3%	\$95,745	2.5%	87.3%	\$344,400	\$1,959
Madison	23	18,269	4.3%	24.3%	\$107,062	1.4%	86.3%	\$403,900	\$2,208
Waterbury	15	110,366	41.3%	17.3%	\$40,867	18.3%	49.2%	\$109,300	\$1,205
Hamden	10	60,960	28.8%	20.1%	\$68,462	4.5%	66.6%	\$195,500	\$1,644

In early February 2014, the City of Madison updated the housing unmet need. The City of Madison identified 6 additional properties which require rehabilitation at an estimated cost of \$2,000,000. .

Applications from homeowners from each of these municipalities may apply for funding under the CDBG-DR owner-occupied rehabilitation program if, like applications from homeowners elsewhere in the eligible jurisdictions, they meet all eligibility criteria, including, for example, the regulatory requirements set forth in the Federal Register Notice.

New London County

A total of six municipalities in New London County reported damage to 271 housing units. Summary demographic data for each of these municipalities is provided in the table below. The total estimated unmet need for owner-occupied rehabilitation in all municipalities within New London County is \$9.7 million.

Applications from homeowners from each of these municipalities may apply for funding under the CDBG-DR owner-occupied rehabilitation program if, like applications from homeowners elsewhere in the eligible jurisdictions, they meet all eligibility criteria, including, for example, the regulatory requirements set forth in the Federal Register Notice.

<i>New London County</i>									
Town	Damaged Homes	Population	Racial/Ethnic Minority	Elderly	Median Income	Poverty Rate	Home Ownership	Current Median Home Value	Current Average Rent
Groton	64	40,115	21.2%	17.8%	\$61,966	5.7%	51.3%	\$196,900	\$1,430
Stonington	62	18,545	7.8%	27.0%	\$80,666	4.1%	70.7%	\$395,200	\$1,719
Old Lyme	50	7,603	3.8%	27.7%	\$92,175	2.8%	82.9%	\$344,900	\$1,560
New London	39	27,620	37.4%	13.2%	\$44,106	16.1%	36.3%	\$148,000	\$1,251
East Lyme	31	19,159	15.5%	23.8%	\$81,599	2.4%	82.8%	\$289,200	\$1,759
Waterford	25	19,517	10.6%	26.6%	\$75,270	2.4%	84.9%	\$224,200	\$1,461

Middlesex County

A total of three municipalities in Middlesex County reported damage to 148 housing units. Summary demographic data for each is provided in the table below. The total estimated unmet need for homeowner rehabilitation in all municipalities within Middlesex County is \$1.8 million.

<i>Middlesex County</i>									
Town	Damaged Homes	Population	Racial/Ethnic Minority	Elderly	Median Income	Poverty Rate	Home Ownership	Current Median Home Value	Current Average Rent
Old Saybrook	76	10,242	6.1%	33.5%	\$78,227	5.3%	83.5%	\$365,000	\$1,708
Clinton	40	13,260	4.2%	22.7%	\$68,225	4.1%	79.9%	\$254,300	\$1,489
Westbrook	32	6,938	4.3%	29.0%	\$63,855	0.5%	80.6%	\$336,500	\$1,618

Applications from homeowners from each of these municipalities may apply for funding under the CDBG-DR owner-occupied rehabilitation program if, like applications from homeowners elsewhere in the eligible jurisdictions, they meet all eligibility criteria, including, for example, the regulatory requirements set forth in the Federal Register Notice.

Needs Assessment: Multifamily Housing

Summary

Hurricane Sandy damage in multifamily housing developments was concentrated in Fairfield and New Haven Counties. In total, multifamily developments comprising 1,298 units sustained damage. Multifamily properties in the 100- and 500-year flood plains were the hardest hit, with three public housing projects collectively comprising 581 units sustaining the largest overall damage. In total, eight public housing properties with a total of 815 units need to be either elevated and rehabilitated or relocated to higher ground.

Surveys from the affected communities indicated 483 units outside the 100- and 500-year floodplains will require rehabilitation at an estimated cost of \$942,000 in Fairfield County and \$691,000 in New Haven County, for an average estimated cost of \$4,000 per unit. The unmet need associated with the cost of such rehabilitation is \$482,500 and \$425,000, respectively.

Preliminary requests from various multifamily property owners for financial assistance under the CDBG-DR Program for new construction in Fairfield County totaled \$7 million. Total project costs are estimated at \$30.3 million in the aggregate, which would create 104 new units of affordable housing above the 500-year flood plain.

In total, eight requests for the elevation or relocation of existing multifamily housing with a total of 815 units were received as part of the State's surveys from the affected communities. In total, the estimated aggregate cost of the various projects was \$240.7 million. The amount of financial assistance under the CDBG-DR Program was \$140 million. These requests were concentrated in Fairfield County.

Unmet Need

The greatest unmet need is in the relocation of existing multifamily housing that serves LMI persons and is located within the 100 year flood plain in Fairfield County. Six existing large LMI developments, collectively comprising 812 units, have been identified by municipalities or housing authorities as requiring funding in order to be rebuilt outside of the 100-year flood plain. These projects include some that are completely in the 100 year flood plain and others that are partially in the 100-year plain and partially in the 500-year flood plain. Detailed applications and redevelopment plans will be necessary to determine if any of these activities are feasible, either physically or financially, but it is clear that the need to address these units exists.

The estimate of the cost of the unmet need in this category reflects the estimates provided by individual housing authorities for the total cost of replacement housing. These estimates total \$147,000,000,

assuming leverage with over \$123 million in low income housing tax credits and tax exempt bond financing.

The second greatest need in this category is the repair and rehabilitation of LMI housing located outside the 100-year floodplain in both New Haven and Fairfield Counties. These developments, which collectively comprise 483 units, include the rehabilitation of scattered-site single family homes for rent and the replacement of roofs for buildings in small multifamily complexes. The total cost of any such rehabilitation work will include any additional work that may be required to bring the properties up to applicable State or local code.

Table 6					
Multifamily Housing Unmet Needs					
Activity	Total Unmet Need	Fairfield County	New Haven County	New London County	Middlesex County
LMI Housing relocated from 100 Year Floodplain	\$147,000,000	\$147,000,000	\$0	\$0	\$0
Rehabilitation of Units outside the Floodplain	\$ 907,500	\$ 482,500	\$ 425,000	\$0	\$0
New Units	\$ 7,000,000	\$ 7,000,000	\$ 0	\$0	\$0
TOTALS	\$154,907,500	\$154,482,500	\$ 425,000	\$0	\$0

Multifamily Costs of Mitigation

One of the primary reasons to consider new construction of affordable replacement housing outside of the floodplain is the extremely high cost of mitigation. It may in fact be more cost effective and efficient to build new units outside of the flood plain, rather than pay the high cost of mitigation in addition to even moderate rehabilitation costs. The table below provides the estimated costs to elevate buildings of various footprint sizes to varying heights.

Table 7					
Multifamily Elevation Costs					
Footprint in Square Feet	First Two Feet	Four Feet Total	Eight Feet Total	Ten Feet Total	Twelve Feet Total
1,000	\$60,000	\$80,000	\$120,000	\$140,000	\$160,000
2,000	\$120,000	\$160,000	\$240,000	\$280,000	\$320,000
3,000	\$180,000	\$240,000	\$360,000	\$420,000	\$480,000
4,000	\$240,000	\$320,000	\$480,000	\$560,000	\$640,000
5,000	\$300,000	\$400,000	\$600,000	\$700,000	\$800,000
6,000	\$360,000	\$480,000	\$720,000	\$840,000	\$960,000

Guidance provided by the Hurricane Sandy Rebuilding Task Force on April 3, 2013 establishes a requirement that all elevations must be one foot above the Base Flood Elevation (“BFE”). In the projects identified by municipalities thus far, the BFE ranges between eight feet and ten feet, resulting in a significant cost to elevate. Elevation, by its nature, results in additional rehabilitation costs related to damage incurred and the relocation of utility connections above the BFE. The typical project submitted has an average of five 5,000 sq. foot buildings, which will require elevation of nine feet, creating an elevation cost basis of \$750,000 per building or a total cost of \$3.75 million for elevation of the typical project.

Homelessness, Transitional and Supportive Facilities, Units and Populations

As stated previously, the State surveyed municipalities, public housing authorities and other local stakeholders, which it conducted in connection with the preparation of this Action Plan. Although we recognize that the displacement of a number families and households has occurred as a result of the damage caused by Hurricane Sandy, to date we have not received any information indentifying any to unmet need or a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities. Objectively, we recognize that the loss of units, and the displacement of these families, if even temporarily, has placed added stress on this valuable community resource. However, the homeless service community. This result is consistent with inquiries made in the immediate aftermath of Hurricane Sandy to homeless shelter operators.

As a result, the State has not reserved any of the first allocation of Funding specifically to address the rehabilitation, reconstruction or replacement of any McKinney-Vento funded shelters and housing for

the homeless – including emergency shelters and transitional and permanent housing for the homeless, and private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program. However, as the State continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order address any newly identified unmet needs that may arise. In addition, the State may allocate a portion of additional CDBG Program funding to address the resiliency measures for transitional and permanent housing for the homeless in order to protect the homeless and other vulnerable populations.

Should information relative to unmet need associated with alleviating the pressures of homelessness associated with the devastation caused by Hurricane Sandy become apparent, the State is committed to allocating any necessary resources from the next allocation of funding, consistent with all federal requirements and obligations.

Through the State’s Entitlement Programs and other resources, there are considerable efforts underway to address the needs of these populations. In accordance with the current State of Connecticut Consolidated Plan for Housing and Community Development (2014), several actions will be taken during the applicable period to address emergency shelter, transitional and permanent housing needs of homeless.

In addition to funding emergency shelters and transitional living programs, the State will continue to provide services through homeless drop-in day programs, Housing First for Families Program, CT Beyond Shelter Program, Housing First for Families; New London County Homelessness Fund Pilot Project; CT Rapid Rehousing-ESG financial assistance; CT Rapid Rehousing housing stabilization supports; food pantries, and connections with other state services. It is the State’s expectations that these services will assist with the reduction in the re-occurrence of homelessness by assisting the target population with services to achieve housing stability, based upon individual needs.

The State has an active permanent supportive (chronic homelessness) housing production program, funded with approximately \$30 million in capital and another \$1.5 million in rental and service subsidies in the State’s budget for fiscal years 2012 and 2013. An additional \$20 million in capital funding, again with additional funding for rental and service subsidies is proposed for the State’s budget for fiscal years 2014 and 2015. This housing production program is expected to fund the creation of 250 permanent supportive housing.

The State has and will continue to contractually require all emergency shelter and transitional living programs to enter information into the HMIS. Various services provided include, but are not limited to: advocacy, intake, needs assessment and case management services; health/mental health services; shelter and housing assistance; transportation/provision of bus tokens, substance abuse counseling, information and referrals, budgeting, etc.

The State anticipates aligning its emergency shelter services with Emergency Solution Grants expectations.

The State will emphasize programs targeted at homelessness prevention and rapid rehousing and supportive housing as the primary means to prevent and end homelessness in Connecticut. The State will work to expand permanent supportive housing in Connecticut to break the cycle of long-term, chronic homelessness.

Housing Goals

The State's housing recovery programs are designed to meet the unmet housing needs of the communities most impacted by Hurricane Sandy (i.e. the costs of repairs, reconstruction and new construction that insurance, FEMA and any other sources of funding does not cover). The objectives of the housing programs include helping people directly affected by Hurricane Sandy by:

1. replacing and rehabilitating homes, including identifying opportunities for mitigation enhancement measures;
2. improving the resilience of their homes while restoring their buildings/residences;
3. Assisting homeowners, multifamily property owners and public housing authorities in completing applications for funding; and
4. Directing homeowners, multifamily property owners and public housing authorities to additional potential sources of funding.

To pursue these objectives, the State has developed a program that incorporates best practices from past disasters; builds upon stakeholder input from agencies and relevant organizations across the affected counties to ensure the diverse needs of residents and communities are appropriately addressed.

The State's strategy will balance speedy response with proper planning, and support while considering and incorporating the distinct needs and resources of different communities the members of those communities. The State will manage all program operations and ensure that all appropriate accountability and oversight mechanisms in place.

Owner-occupied Housing Program

Based on the identified needs of the State's most impacted communities, the State will have a single owner-occupied housing program to provide funding both to property owners that need only rehabilitation assistance and those that need substantial rehabilitation or reconstruction assistance as well as mitigation.

In addition, the State will permit reimbursement for eligible expenses incurred and for mitigation only under the same terms and conditions outlined below.

DOH staff and third-party contractors will provide assistance to potential applicants at the application stage and then will work closely with homeowners eligible for assistance under this program to evaluate the extent of the damage, engage a contractor to perform the appropriate scope of construction work.

Summary of Program Eligibility and Program Priorities for Owner-occupied Housing Programs

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance, including, without limitation, the following activities:
 - acquisition of real property; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; American Disability Act improvements; fair housing counseling; homeownership counseling and assistance; and actions to meet the State’s certification to affirmatively further fair housing.
- Impacted and Distressed Area – each property must be located in one of the four counties in which the expenditure of the Funding is allowable (i.e. Fairfield County, New Haven County, Middlesex County, New London County) or the Mashantucket Pequot Indian Reservation, all of which sustained significant damage from Hurricane Sandy;
- Readiness to Proceed – each property must be capable of being undertaken immediately to provide outcomes to intended beneficiaries effected by the disaster;
- Feasibility – each property must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each property must be reflective of the goals, priorities and requirements of the State of Connecticut’s 2010-2015 Consolidated Plan.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 80% of the Funding be spent in Fairfield and New Haven Counties;
- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);

- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible.

Multifamily Rehabilitation Program

The Multifamily Rehabilitation program will provide financial assistance to rehabilitate LMI units in eligible multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by Hurricane Sandy and located outside the 100 and 500 year flood plain in any community in Fairfield and New Haven counties. The general requirements of this program are as follows:

1. Eligible applicants include owners of existing low moderate income (LMI) multifamily properties outside of the 100 and the 500 year flood plain in New Haven and Fairfield counties (for-profit and non-profit owners as well as public housing authorities);
2. An eligible applicant’s property must have been damaged by Hurricane Sandy;
3. Each property to be assisted must have been insured at the time of the storm;
4. Each property to be assisted must be current on property taxes, if applicable (“current on property taxes” includes being in compliance with a payment plan or stipulated agreement with the taxing entity);
5. Each property must have a minimum of five units (applicants may aggregate existing units to meet the threshold of five units);
6. Properties to be assisted must meet applicable State and local codes at completion;
7. The owner/developer must submit a relocation plan that conforms to the Uniform Relocation Act (the “URA”), if applicable;
8. The owner must propose the financial structure, which, at a minimum shall meet all of the following criteria:
 - a. CDBG-DR Program funds are used as gap financing in the form of a subordinate debt, which may be secured by a mortgage;
 - b. CDBG-DR Program funds are limited to the hard and soft costs of rehabilitation;
 - c. The application accounts for the expenditure of all benefits received prior to application, including:
 - i. insurance payments;

- ii. FEMA or SBA payments;
 - iii. Cash or other benefits provided by any charitable organization in connection with the project;
 - iv. Other federal, State or local financial assistance provided in connection with the project.
9. All properties assisted with CDBG-DR Program funds shall be encumbered with a lien for a period to be determined by DOH based on its underwriting of the project;
 10. The property and the applicant meet all of the federal, State and local requirements of eligibility and underwriting for the Funding and all other applicable federal requirements;
 11. No portion of the Funding may be used to reimburse the applicant for costs incurred prior to its application.

Multifamily Rehabilitation/Rebuilding and Mitigation Program

The Multifamily Rehabilitation/Rebuilding and Mitigation Program will target eligible LMI multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by Hurricane Sandy and located within the 100 or 500 year flood plain in any community in Fairfield and New Haven counties. The general requirements of this program are as follows:

1. Eligible applicants include owners of existing low moderate income (LMI) multifamily properties outside of the 100 and the 500 year flood plain in New Haven and Fairfield counties (for-profit and non-profit owners as well as public housing authorities);
2. An eligible applicant's property must have been damaged by Hurricane Sandy;
3. Each property to be assisted must have been insured at the time of Hurricane Sandy;
4. Each property to be assisted must be current on property taxes, if applicable ("current on property taxes" includes being in compliance with a payment plan or stipulated agreement with the taxing entity);
5. Each property must have a minimum of twenty units or beds in the case of McKinney-Vento funded shelters (applicants may aggregate existing units to meet the threshold of twenty units);
6. All applicants must submit a feasibility analysis of the most cost effective approach of either mitigation and rehabilitation/reconstruction or relocation and reconstruction;
7. Properties to be assisted must meet applicable State and local codes at completion and meet the federal and State requirements for energy efficiency, if applicable;
8. Relocation of replacement units outside the floodplain;
 - a. Units to be constructed must meet applicable State and local codes at completion and meet the federal and State requirements for green building and energy efficiency;
 - b. The owner/developer must submit a relocation plan that conforms to the URA, if applicable;
 - c. For State Public Housing, the residual vacant land shall be sold at public auction to the highest bidder and the net proceeds (sale price less costs of sale and public or private

sector liens) realized from the sale shall be distributed as follows: to DECD/DOH, the total amount of CDBG-DR Program funds, if any, expended on the demolition of the existing units together with one half of the net proceeds, and the balance to the developer/owner;

- d. A public housing authority applicant proposing the relocation of units out of the flood plain shall provide a HUD disposition plan for the closure of existing public housing units;
9. Elevation and Rehabilitation:
- a. The applicant shall be required to raise the elevation at least one (1) foot above the applicable flood plain map 100 year elevation; and
 - b. The applicant shall be required to raise all base utilities to the required code level above the elevation;
10. The applicant must propose the financial structure, which, at a minimum shall meet all of the following criteria:
- a. CDBG-DR Program funds are utilized as gap financing in the form of subordinate debt, which may be secured with a mortgage;
 - b. CDBG-DR Program funds are limited to the hard and soft costs of mitigation and rehabilitation or new construction;
 - c. The applicant must propose a financial structure that leverages CDBG-DR Program funds by:
 - i. Utilizing four percent or nine percent low income housing tax credits; or
 - ii. Utilizing other forms of financing or equity except deferred development fees;
 - d. The application accounts for the expenditure of all benefits received prior to application, including:
 - i. insurance payments;
 - ii. FEMA or SBA payments;
 - iii. Cash or other benefits provided by any charitable organization in connection with the project;
 - iv. Other federal, State or local financial assistance provided in connection with the project.
11. All properties assisted with CDBG-DR Program funds shall be encumbered with a lien for a period to be determined by DOH based on its underwriting of the project;
12. The property and the applicant must meet all of the federal, State and local requirements of eligibility and underwriting for CDBG-DR Program funding and all other applicable federal requirements.
13. No portion of the Funding may be used to reimburse the applicant for costs incurred prior to its application.

Funding Priorities

Public Housing Properties

The State intends to provide significant financial assistance, both with a portion of the Funding, as well as with other state-administered resources (see section V. Federal, State, Local, Non-profit, and Individual Sources of Funding to be Leveraged) to specifically address the needs of the most critically impacted state and federal public housing units identified in the Needs Assessment (see the chart below).

Public Housing Properties in the 100 Year Flood Plain						
County	Town	Description	Estimated Unmet Need	Total Cost	Number of Units	Estimated Cost per Unit
Fairfield	Bridgeport	Marina Village	\$ 50,000,000	\$ 105,000,000	406	\$ 258,621
Fairfield	Stratford	Meadowview Manor	\$ 22,700,000	\$ 32,307,600	100	\$ 323,076
Fairfield	Stratford	Elm Terrace	\$ 11,350,000	\$ 16,153,800	50	\$ 323,076
Fairfield	Stratford	Hearthstone Apartments	\$ 22,700,000	\$ 32,307,600	100	\$ 323,076
Fairfield	Stratford	Robert F. Kennedy Apts.	\$ 17,025,000	\$ 24,230,700	75	\$ 323,076
Fairfield	Norwalk	Washington Village	\$ 16,000,000	\$ 30,416,005	81	\$ 323,076
New Haven	Milford	136 Merwin Ave (5 1br)	\$ 140,000	\$ 140,000	1	\$ 140,000
New Haven	Milford	183 Broadway (duplex)	\$ 125,000	\$ 125,000	2	\$ 62,500
Total			\$ 140,040,000	\$ 240,680,705	815	\$ 259,563

In particular, the State is committed to working closely with the affected public housing authorities to identify necessary costs and ensure that funding is dedicated to addressing the unmet needs of damaged public housing. We anticipate that not less than \$13 million of the \$26 million allocated for the Multifamily Rehabilitation/Rebuilding and Mitigation Program will be used to assist public housing units.

HUD-assisted Housing, McKinney-Vento funded shelters, other HUD Properties

Through the various data and information collection efforts carried out by the State, as detailed earlier in this section and described in the Citizen Participation portion of section XII, there have not been any HUD-assisted housing properties identified as having unmet needs. However, these properties are

eligible to apply for the Funding, using the criteria established above, and will be eligible to compete for funds necessary to address their specific needs.

Infrastructure

Needs Assessment

Based on the State’s needs assessment survey, public outreach and FEMA reports, it is clear that Connecticut sustained significant damage to infrastructure as a result of Hurricane Sandy.

The largest unmet need identified to date in the area of infrastructure is the repair or replacement of drainage systems. However, roads and seawalls also have significant unmet repair and rebuilding needs. These three areas constitute approximately eighty percent (80.0%) of repair, replacement and construction activities identified.

Table 8		
Infrastructure/Infrastructure-Related/Public Facilities Unmet Needs		
Activity	Total Unmet Need	Percentage of Unmet Need
Drainage	\$ 9,623,053	6.1%
Roads & Bridges	\$ 59,264,743	37.7%
Seawalls & Dykes	\$ 76,680,846	48.7%
Municipal Utility Repairs	\$ 910,200	0.6%
Water & Sewer	\$ 10,625,000	6.8%
Sidewalks	\$ 294,000	0.2%
INFRASTRUCTURE TOTALS	\$157,397,842	100%
Equipment	\$ 14,117,780	
Public Facilities/Buildings	\$ 709,229	
Planning (Resiliency/Mitigation)	\$ 9,000,000	
Resiliency Only	\$ 32,300,000	

Infrastructure projects represent a wide range of unmet need encompassing numerous types of infrastructure repair, including, for example, dredging existing channels and repairing or replacing fences and guardrails along critical roadways.

Moreover, the calculation of unmet needs in the infrastructure is not intended to be comprehensive as much of the necessary data is not yet available. The State will continue to collect and analyze data in connection with future allocations of funding under the CDBG-DR Program.

Infrastructure Goals

The primary goal of Connecticut's CDBG-DR disaster recovery program with regard to infrastructure is to restore a suitable living environment in disaster impacted areas by rehabilitating or reconstructing infrastructure, particularly though exclusively where such infrastructure primarily serves LMI persons. The State also intends to make infrastructure repairs in a manner that supports energy conservation/efficiency objectives and responsible growth as well as transit-oriented development.

Infrastructure Program

The proposed allocation from the Funding specifically for infrastructure activities is \$30,000,000. As previously noted, it is not expected that this amount is sufficient to address a large portion of the State's unmet infrastructure needs. In response to the DOH request for information regarding infrastructure and infrastructure-related needs, other state agencies and local governments identified more than forty projects with needs totaling approximately \$157.4 million. HUD has indicated that future CDBG-DR funding will be intended primarily for unmet infrastructure, public facility and mitigation "only" needs. Connecticut will more fully address its infrastructure needs when such future funds are allocated.

Grant Caps

There are no grant caps associated with this activity. However, local governments will be required to provide a 25% match toward the total development cost of the activity. Infrastructure projects will be selected on a basis modeled after the Small Cities CDBG Program. Funding will be available to specific projects submitted by municipalities and their partners through a competitive application round. DOH will provide advance notice of fund availability but will reserve the right to cease accepting applications at any time that all available funds have been committed.

Consistent with CDBG-DR Program requirements, the State's use of a portion of the Funding for this program will be consistent with the following:

Eligibility Threshold Requirements

1. Unmet Needs – Funding is available solely to address unmet needs;
2. Eligible/Fundable – each project must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and related guidance;
3. Impacted and Distressed Area – each project must be located in one of the four counties in which the expenditure of the Funding is allowable (i.e. Fairfield County, New Haven County, Middlesex County, New London County) or the Mashantucket Pequot Indian Reservation, all of which sustained significant damage from Hurricane Sandy;

4. Readiness to Proceed – each project must be capable of being undertaken (design or construction) immediately to provide outcomes to intended beneficiaries effected by the disaster;
5. Feasibility – each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
6. Consistency with Consolidated Plan/Action Plan – each project must be reflective of the goals, priorities and requirements of the State of Connecticut’s 2010-2015 Consolidated Plan.

Funding Priorities

Funding priorities are proposed for Second Tranche, as follows:

- Restoration or replacement of infrastructure damaged as a result of Superstorm Sandy, especially for projects that are vital for the redevelopment of properties damaged as a result of Superstorm Sandy.
- Hardening/mitigation activities related to water or wastewater systems.
- Hardening/mitigation activities related to streets and/or drainage systems.
- Hardening/mitigation of transportation systems and controls.
- Hardening/mitigation of energy systems.
- Other mitigation activities.

Project Selection Process

As previously indicated in our Action Plan, Infrastructure projects will be selected on a competitive basis modeled after the Small Cities CDBG Program. Funding will be available to specific projects submitted by municipalities, regional councils of government, state agencies, and other eligible partners through a competitive application round.

DOH will assemble representatives from within the Department, as well as from the DESPP/DEMHS, DEEP and DECD for application review. Detailed rating and ranking criteria will be established consistent with the Funding Priorities identified above, as well as the Comprehensive Risk Analysis used to develop the Connecticut Natural Hazard Mitigation Plan.

Prior to implementation, these rating and ranking criteria will be made available to the public and our constituent groups consistent with the citizen participation requirements in our Action Plan, which would include a 7 day public comment period.

Applications will be reviewed by the interagency team, and recommendations will be made to the Commissioner prior to award.

Construction / Reconstruction of Streets and Drainage Systems

Infrastructure activities will include the construction or reconstruction of streets, bridges and drainage systems. The State’s needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Necessary repairs and construction projects are estimated to cost

approximately \$ 68,887,796. Anticipated uses of funds in this activity area are expected to include a focus on road and drainage improvements.

Rehabilitation/Reconstruction of Other Non-Residential Structures

Additionally, infrastructure activities will include the rehabilitation/reconstruction of other non-residential structures. The State's needs assessment indicates a large unmet need for infrastructure repairs related to seawalls that either failed or were damaged, and is estimated to cost \$76,680,846. It is therefore anticipated that a portion of the Funding will be used to address unmet needs related to seawall repairs. In addition to allocating a portion of the Funding for seawall replacement or repairs, the State may direct a portion of the Funding for improvements to publicly owned utility infrastructure and sidewalks along with a variety of other improvement projects.

Construction / Reconstruction of Water Sewer Lines or Systems

Lastly, infrastructure activities will include the reconstruction or construction of water and sewer lines or systems. While the State has collected detailed information about potential projects (as part of its needs assessment), it plans to select projects through the competitive process described above. Complete information on all selected infrastructure projects will be provided to the public at the conclusion of that process. At the time of the submission of this Action Plan Amendment, the State notes that six point eight percent (6.8%) of its unmet needs relate to water and sewer facilities so a portion of the allocation is likely to be used for this category of improvements.

Public Facilities

Allocation: \$0

Since the completion of the initial Action Plan, the State's has gathered additional responses to the request for unmet needs data. For this Amendment, local governments identified an additional seventeen projects with unmet needs totaling of approximately \$27.9 million bringing the total unmet needs for Public Facilities to just over \$62 million. Public Facilities projects received an initial allocation of \$2.2 million, which was (or will be) utilized to meet just 6.4% of the initially identified unmet needs. However, due to Funding priorities, there will be no additional allocation of Funds for Public Facilities as part of this Action Plan Amendment.

C. Risk Analysis

The 2014 Connecticut State Hazard Mitigation Plan Update serves as guidance for hazard mitigation for the State of Connecticut. Its vision is supported by three central goals, each with an objective, a set of strategies and associated actions for Connecticut state government, stakeholders, and organizations that will reduce or prevent injury from natural hazards to people, property, infrastructure, and critical state facilities. Funding for this Plan was provided through a FEMA Hazard Mitigation Grant Program (HMGP) sub-grant (FEMA-DR-4023-CT-2P). This plan fulfills the standard state mitigation planning requirements (44 CFR §201.4) of the Disaster Mitigation Act of 2000 (DMA2000; Public Law 106-390, signed into law October 10, 2000). This plan was adopted by the State on and approved by FEMA on January 9, 2014. Excerpts from the Executive Summary of the Report are included later in this section.

The State will be selecting projects based on a set of criteria that includes the sustainability of construction proposed and durability of materials. DOH, in consultation with the Department of Energy and Environmental Protection (DEEP) and the Department of Emergency Services and Public Protection/Division of Emergency Management and Homeland Security (DESPP/DEMHS) and will be evaluating all proposals based on the principles in the 2014 Connecticut Natural Hazards Mitigation Plan Update (CTNHMP) and the Ranking Methodology laid out in the plan update. The Goals, Objectives and Strategies that will be employed can be found in Section 2.6 of this Plan. The CTNHMP is posted at: http://www.ct.gov/deep/lib/deep/water_inland/hazard_mitigation/ct_nhmp_adopted_final.pdf.

For the purposes of this plan, a standardized methodology was developed to compare different hazards' risk on a jurisdictional (County) basis, as decided by the Mitigation Planning Team. This method prioritizes hazard risk based on a blend of quantitative factors extracted from NCDC and other available data sources. This risk assessment ranking is new to the 2014 plan update and has been structured to identify:

- 2010 population vulnerability (US Census)
- 2025 population projections (UCONN)
- 2012 Building Permits (CT DECD)
- Annualized events (NCDC)
- Annualized damages (NCDC)
- Injuries and/or deaths from previous events (NCDC)
- Local plan ranking
- Geographic extent (Hazard Specific)

Eight ranking parameters were used to determine jurisdiction based hazard rankings. Each parameter was rated on a scale of 1 through 4, with those rated 1 considered low risk and those rated at 4 considered high risk. Population vulnerability, projections and building permits are each weighted at 0.5

relative to all other parameters. Since building permit data and housing stock changes showed consistent results, building permits were used instead of changes in overall housing stock in order to better capture additional growth activity not captured by new structures alone. Geographic extent was weighted at 1.5 relative to all other parameters. Damages, events, death/injuries and local plan ranking were weighted 1.0 relative to the other parameters. These scores were summed by jurisdiction for each hazard separately, allowing for easy comparison between jurisdictions for each hazard type. A summation of all the scores for all hazards in each jurisdiction provides a composite, “all-hazards” risk prioritization.

In order to simply comparison of NCDC data, events and damages were all annualized. This was accomplished by taking the parameter of interest and dividing by the length of record for each hazard. This annualized value provides an estimate of what can be expected in a given year. Comparing and prioritizing the risk posed by different hazards requires a system for equalizing the units of analysis. Since many of the hazards assessed in this plan do not have quantifiable probability or impact data, some semi-quantitative scoring were used in the ranking algorithm used to compare hazards.

Every grantee or subrecipient that receives funding through the CDBG-Disaster Recovery program will be required to agree to a long-term Maintenance Agreement for the infrastructure and or facility assisted through CDBG-DR. This Maintenance Agreement will commit the unit of local government (ULG) to up-keep and maintenance of the item along with state monitoring annually. All costs for upkeep and repairs will be borne by the ULG.

Planning Process

The development of this plan was led by the hazard mitigation staff at the Department of Energy and Environmental Protection (DEEP) and the Department of Emergency Services and Public Protection, Division of Emergency Management and Homeland Security, with the assistance of Dewberry’s consulting team. The Connecticut State Hazard Mitigation Planning Team (SHMPT) and a large group of stakeholders that include Connecticut state agencies, Federal government collaborators, Non-Governmental Organizations, and local representation attended four plan development meetings and provided comments on the plan draft. Staff from FEMA Region I’s Joint Field Office (JFO) offices provided additional technical assistance and plan review. Public participation for the update of the Plan was primarily enabled through participation in an internet-based survey and posting of the Draft 2014 Connecticut State Hazard Mitigation Plan Update to DEEP’s website.

Natural Hazard Identification and Risk Assessment

The SHMPT identified natural hazards that threaten Connecticut and ranked them according to the relative extent of risk they pose to the lives and property of the state’s residents and its economy. Vulnerability assessments and loss estimations, based on the history of occurrences and exposure, were developed to present an understanding of the potential impacts to the State from natural hazard events.

Population

To fully understand the risks and potential impacts of natural hazard events, it is pertinent to understand the assets including facilities and population within the State that may be at risk. Section 2.2.2 presents a summary of Connecticut's demographics. The total state population estimate for 2012 was 3,590,347 people. Fairfield, Hartford, and New Haven have the greatest density of people per square mile. Two-thirds of the State's population and housing units are within Fairfield, Hartford, and New Haven counties.

Facilities

The Connecticut Department of Administrative Services, Division of Construction Services provided available data on critical and state facilities. The assessed values for the buildings were derived from the JESTIR database. There are over 3,300 state-owned facilities, valued over \$8.7 billion. Hartford contains over 26% of the structures. There are over 1,400 identified critical facilities as presented in data files including law enforcement, fire stations, EMS, health departments, and correctional facilities and water pollution control facilities (WPCFs). Additionally, one nuclear power plant, Petroleum, Oil, and Lubricant (POL) terminals, storage facilities, and farms have been included as critical facilities. Fire stations account for 42% of the structures within the critical facilities dataset, followed by EMS (34%), and law enforcement (15%).

Land Use and Development

Existing and planned land use patterns greatly influence a community's hazard vulnerability. Future land use decisions should look at a community's potential hazards and vulnerability, and direct development towards those areas that are least vulnerable, creating a more disaster-resistant environment. Section 2.2.4 summarizes the current land use and development trends within Connecticut. The Center for Land Use Education and Research (CLEAR) at the University of Connecticut provides information, education, and assistance to land use decision makers, in support of balancing growth and natural resource protection. CLEAR provided a Statewide Land Cover map from 2006 which presents 12 different land cover types across categories such as developed land, forests, and grass. From 1985 to 2006 developed land increased almost 3% throughout the state and turf & grass increased 1.5%, while deciduous and coniferous forests decreased by 3.5% collectively. A significant amount of the development occurred along the shoreline, which is vulnerable to storm surge and flooding. Development also occurred along Route 91 in the center of the state and within denser municipalities. Based on the number of building permits issued in Connecticut, development slowed dramatically between 2007 and 2011.

Climate Change

Climate change is both a present threat and an on-setting disaster. It acts as an amplifier of existing hazards. Extreme weather events have become more frequent over the past 40 to 50 years and this trend is projected to continue. Rising sea levels, coupled with potentially higher hurricane wind speeds,

rainfall intensity, and storm surges are expected to have a significant impact on coastal communities. More intense heat waves may mean more heat-related illnesses, droughts and wildfires. This plan update includes discussions of how climate change is and will continue to impact the frequency, intensity and distribution of specific hazards. Several state-level committees and task forces have been established to address climate change and sea level rise issues. The progress of these groups is outlined in Chapter 3.

History of Natural Disasters

Since 2010, Connecticut has experienced six major disaster declarations, while during the decade prior, the state had only experienced two major disaster declarations. There have been 19 State disaster declarations and 11 emergency declarations since 1954. These disasters had significant impacts on Connecticut and its residents, such as loss of residences, property and possessions, loss of life and injury, lost wages and business revenue, in addition to psychological and sociological costs to disaster victims and their families. Historically, flooding has caused the most damage to the State and its citizens, along with recent wind and winter storm disaster events.

Section 2.3.1 presents a summary of disaster declarations in Connecticut including brief descriptions of major Disaster Declarations and Emergency Declarations since 2011. These include Winter Storm Nemo, Super Storm Sandy, Tropical Storm Irene, and several other weather events.

Section 2.3.2 details the records available within the National Oceanic and Atmospheric Administration (NOAA) National Climatic Data Center (NCDC) database. NOAA has recorded an estimated 4,016 severe weather events for Connecticut in the NCDC storm events database, dating back to 1950. Since the 1950s, over 1.6 billion in property losses has been documented in NCDC. The majority of the documented damages are attributed to tornado, specifically in Hartford and New Haven counties. Thunderstorms represent 61% of the events within the database, followed by Winter Weather (20%) and Flood (15%). Litchfield has experienced the most events including thunderstorms, winter weather, and flooding. No losses have been recorded for drought.

Review of Local Hazard Mitigation Plans

In preparation of this plan update, local hazard mitigation plans covering 156 communities were reviewed for three components: (1) identified hazards, (2) estimated potential losses, and (3) land use and development trends.

Estimations of potential losses were highly variable among the local plans. The majority of plans provided loss estimates based on historical damages from flooding, wind, or earthquake events. Table 2-13 summarizes the results.

Table 2-13. Local plan loss estimates by hazard type

Hazard Type	Total Loss Estimate	Number of Plans with Loss Estimates
1% Annual Chance Hurricane Wind	\$1,582,020,000	56
1938 Hurricane Wind (LCRVCOG)	\$4,181,000,000	17
1% Annual Chance Flood	\$3,137,146,000	53
Earthquake (Largest damage of four CT State Plan Scenarios)	\$6,248,160,000	47

A review of land use from the local hazard mitigation plans presents a closer look at where development is occurring across the state. Although Tolland and Windham Counties have largely remained rural, many of the other counties have seen development over the years and may continue to see increased development moving forward. Many communities in Fairfield County are projecting that growth will occur near Metro-North stations, including Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston and Westport. Additionally, it seems that there is growth in many towns like Easton and Fairfield, and although towns such as Fairfield are limiting development in natural hazard areas like the coast and, specifically, the Town of Monroe is looking to designate areas as open space, other communities, like the Town of Stratford, have indicated that growth has been directed to former industrial areas that are located within the coastal flood hazard area.

Public Input

Public participation and input was gathered through an internet-based survey. Survey questions related to hazard identification and recent hazards events. Several important messages were provided by the survey responders. With equal emphasis, the top two messages are to:

- Address wind and snow damage to electrical lines that results in power outages, and
- Manage flood risk zones to reduce flood damage.

Responders would like the state, municipalities, and utilities to address wind and snow damage to electrical lines by requiring, facilitating, funding, encouraging, or accomplishing trimming of tree limbs, removal of trees, burying power lines, hardening power lines, and creation of micro-grids and other redundancies. Responders would like the State and its municipalities to remove structures from flood zones, prevent new buildings in flood zones, and prevent rebuilding in flood zones after damage occurs. While many of the responders were speaking of inland and coastal flood zones, some of them chose to emphasize retreat from the shoreline. The public input was integrated into the development of state mitigation activities as presented in Chapter 5.

Hazard Analysis and Ranking

A detailed hazard ranking methodology is presented in Section 2.6. This process incorporated 2010 population vulnerability, 2025 population projections, 2012 building permits, annualized events, annualized damages, injuries and/or deaths from previous events, local plan ranking, and geographic extent.

Section 2.7 contains descriptions of each type of natural hazard Connecticut may expect to experience. The descriptions include general information, past history, future risk and vulnerability. Supplemental information on past events and analysis is provided in Appendix 2.

The hazards determined to have a significant impact on the population and built environment of Connecticut are:

- **Thunderstorm related hazards**
 - High Wind
 - Severe Thunderstorm
- **Tropical Cyclone (Hurricane and Tropical Storm)**
- **Tornado**
- **Winter related hazards**
 - Blizzard
 - Freezing Rain
 - Ice Storm
 - Nor'easter
 - Sleet
 - Snow
 - Winter Storm
- **Flood related hazards**
 - Riverine Flooding
 - Coastal Flooding
 - Flash Flooding
 - Shallow Flooding
- **Sea Level Rise**
- **Wildland Fire**
- **Drought**
- **Earthquake**

Figure 2-69 depicts the results of the risk analysis. The composite ranking as shown, provides a tool for the State of Connecticut to prioritize appropriate mitigation actions within each county.

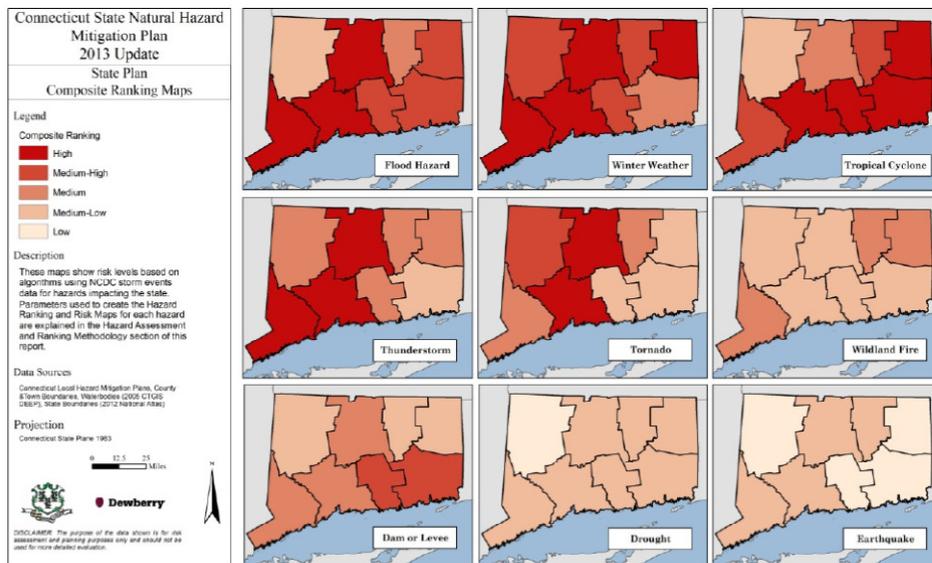


Figure 2-69. Composite hazard ranking maps, relative to Connecticut.

Potential Losses and Anticipated Impacts

Based on information from the NCDL database, Connecticut has experienced over \$1.4 billion in property damages from the hazards profiled in this plan. The state can expect to experience approximately \$28,859,935 in annualized damages due to all the hazards that impact the State (excluding the NCDL hurricane events). Flooding and winter weather have the highest total annualized losses of the ranked hazards and together make up over 91% of the total NCDL annualized losses. Thunderstorm and winter weather occur the most frequently, at least 40 times a year statewide. Hartford and Litchfield can expect 8 thunderstorm related events in any given year while Fairfield and Litchfield will see over 5 flooding events per year.

Capability Assessment

The State and local governments offer many policies, programs, and capabilities to support the implementation of mitigation actions. Chapter 3 presents in detail federal agencies, state agencies, and local agencies which continue to assist with mitigation and risk reduction activities across the State. This chapter outlines pertinent executive orders, programs, and policies at all levels of government which support the State's mitigation strategy. It also acknowledges capabilities available through utility providers, the University of Connecticut, The Nature Conservancy, Citizen Volunteer Organizations, and other groups such as the American Red Cross and the Salvation Army.

Some key committees and task forces established in recent years which support resiliency include:

- The Adaptation Subcommittee of the Governor's Steering Committee on Climate Change (formed in 2008)
- The Governor's Two Storm Panel (formed in 2011)

- The Connecticut GIS Council's (now with the Office of Policy and Management) Storm Response and Recovery Assessment Group(formed in 2011)
- The Shoreline Preservation Task Force (formed in 2012)
- The State's Long-Term Recovery Committee (formed in 2012)
- The State Vegetation Management Task Force (formed in 2012)

Other new improvements to the state's capabilities in this regard include Risk MAP progress, updates to the State Building Code, and updates to the State Conservation and Development Policies Plan.

Local Planning Coordination

The State of Connecticut continues to encourage and facilitate local planning efforts to ensure that local and multi-jurisdiction hazard mitigation plans are in place. Connecticut began assisting communities in the drafting of local hazard mitigation plans in 1997, utilizing Flood Mitigation Assistance (FMA) planning grant funds. The State of Connecticut's current approach is to work with regional planning organizations (RPOs) as frequently as possible to prepare multi-jurisdiction hazard mitigation plans. It is expected that 100% of Connecticut communities will have a local plan in place by the time of the next State HMP update in 2016.

Hazard Mitigation Strategy for 2014

During the 2014 plan update process, the State's planning team met on multiple occasions to discuss the goals, objectives, strategies, and activities required to minimize the identified natural hazard risks. Chapter 5 presents the detailed mitigation strategy which is based on the following goals and objectives. The complete mitigation strategy includes specific strategies for each goal as well as prioritized implementable actions.

- **Goal 1** – Promote implementation of sound floodplain management and other natural hazard mitigation principals on a State and local level.
Objective for Goal 1: To increase general awareness of Connecticut's natural hazards and encourage State agencies, local communities, and the general public to be proactive in taking actions to reduce long-term risk to life and property.
- **Goal 2** – Implementation of effective natural hazard mitigation projects on a state and local level
Objective for Goal 2: To enhance the ability of State agencies and local communities to reduce or eliminate risks to life and property from natural hazards through cost-effective hazard mitigation projects.
- **Goal 3** – Increase research and planning activities for the mitigation of natural hazards on a state and local level
Objective for Goal 3: To increase general awareness of Connecticut's natural hazards

and encourage State agencies, local communities, and the general public to be proactive in taking actions to reduce long-term risk to life and property.

Plan Monitoring, Maintenance, and Revision

A Mitigation Action Tracker spreadsheet was created for tracking implementation of all new and “carry over” mitigation actions. Specific annual reporting and update targets have been established with firm due dates in the maintenance schedule presented in Section 6.2.3. Primary responsibility for plan monitoring and maintenance resides with the SHMO, within DEMHS. Standing, ad-hoc Mitigation Sub-Committees will be convened, surveyed or engaged periodically as necessary during the 2014–2016 plan implementation cycle.

Hurricane Sandy impacted:

5 counties
2 tribal nations
12,380+ residents (registered for disaster assistance)

\$11.5 million was approved for housing assistance

\$32+ million was approved in low-interest disaster loans

D. Resilience Performance Standards

The State recognizes that future storms may severely damage homes, businesses, infrastructure and public facilities in municipalities throughout Connecticut. It is essential that our infrastructure and public facilities be hardened in anticipation of these events. The full allocation for these efforts will be \$7,000,000 with a portion of these Planning funds (\$1,800,000) being used to assist the State, regional planning agencies, and/or local governments to plan resiliency and mitigation investments that are anticipated to be addressed with future allocations of funds. For example, the State may undertake a coordinated effort to promote consistency in resiliency and mitigation planning across State agencies and local governments, training and capacity building initiatives to promote preparedness, hazard mitigation, and future disaster resilience at the local, regional and state level, and specific studies to coordinated, cost effective long-term resiliency and mitigation investments.

In addition, a significant and necessary investment has been made in preparation for the receipt and distribution of the Funding. Accordingly, the State will utilize a portion of these Planning funds to offset the costs incurred to develop the proposed programs and activities through which the Funding will be administered.

The State of Connecticut has put together a Natural Hazard Mitigation Plan update. The development of the plan was led by the hazard mitigation staff at the Department of Energy and Environmental Protection (DEEP) and the Department of Emergency Services and Public Protection, Division of Emergency Management and Homeland Security, with the assistance of Dewberry’s consulting team. The Connecticut State Hazard Mitigation Planning Team (SHMPT) and a large group of stakeholders that include Connecticut state agencies, Federal government collaborators, Non-Governmental Organizations, and local representation attended four plan development meetings and provided comments on the plan

draft. Staff from FEMA Region I's Joint Field Office (JFO) offices provided additional technical assistance and plan review. Public participation for the update of the Plan was primarily enabled through participation in an internet-based survey and posting of the Draft 2014 Connecticut Natural Hazard Mitigation Plan Update (CTNHMP) to DEEP's website.

This plan presents the types of natural hazards that have potential to inflict significant damage to various parts of the state. Those hazards are incorporated into a risk analysis that presents what parts of the State are more vulnerable than others depending on the type of natural hazard. This information is then paired with a hazard mitigation strategy that outlines the various steps the State is taking or will take to guard against major damage. A major part of the plan includes a detailed account of the Planning Process to develop and incorporate mitigation strategies. It is within this planning process that the resilience performance standards will be developed and guidance about which types of projects the standards apply to will be given.

In addition, DEEP has developed a list of infrastructure projects that are priorities. At this stage, there has already been considerable attention given to how these projects will promote resilience and mitigate for the possible adverse effects of climate change.

In the Federal Register Notice dated November 18, 2013, it was required that grantees identify and implement resilience performance standards that can be applied to each infrastructure project. The notice goes on to say that the grantees are expected to describe plans for the development and application of these standards. The Infrastructure Resilience Guidelines are spelled out in the *Hurricane Sandy Rebuilding Strategy* developed by the Hurricane Sandy Rebuilding Task Force (see Pages 50 thru 52 of that report). It is the intention of the State to implement the Infrastructure Resilience Guidelines, wherever practicable and achievable, as well as consistent with the CTNHMP. In addition, it will be expected that infrastructure projects that are identified in the future and seek State funding will adhere to these Infrastructure Resilience Guidelines and performance standards.

E. Green Infrastructure Projects and Activities

Green infrastructure as defined in the Federal Notice is the "integration of natural systems and processes, or engineered systems that mimic natural systems and processes, into investments in resilient infrastructure." Green Infrastructure and Low-Impact Development (LID) are often used interchangeably. Through the needs assessments done prior to the action plan as well as the DEEP Hazard Mitigation Plan update, the State has identified a list of infrastructure projects. Many of those projects relate to stormwater management and will use green infrastructure best practices. If selected to receive funding, projects such as the living shoreline pilot and other erosion and flood control projects will use LID strategies to mimic natural drainage systems. It is the State's expectation that any project planning on receiving CDBG-DR dollars will incorporate green infrastructure practices where appropriate and feasible. Any infrastructure project that does not, will either not receive funding or will have to demonstrate using acceptable cost-benefit methodologies why it is not feasible and/or cost effective.

The State will also strongly encourage attention to the green infrastructure components of the green building standards that will be required for any new housing construction. The State will instruct all funding recipients to familiarize themselves with the EPA's Green Infrastructure resources and incorporate them into their project to the extent feasible. The Enterprise Green Communities Criteria will guide funding recipients in this regard to a certain extent as well – primarily through landscaping techniques. In New Haven and Bridgeport, two of the impacted communities, feasibility studies were recently completed for incorporating green infrastructure policies into their storm water management planning. So, there is in-state familiarity with the costs and benefits of incorporating green infrastructure techniques.

In addition, the State will build off the work that DEEP has done around LID. It will promote educational events such as their Green Infrastructure Symposium and the range of educational resources around green infrastructure such as the low-impact development manuals DEEP has developed. It will also continue work with municipalities to expand the number that have adopted LID guidelines into their land use requirements. The State of Connecticut, through its agencies as well as institutions of higher education, have a wealth of knowledge and resources to ensure that green infrastructure is incorporated into the storm water and erosion infrastructure projects that come about when rebuilding after Hurricane Sandy.

F. Long-Term Efficacy and Fiscal Sustainability:

The State of Connecticut has adopted the following principles which were laid out in the Hurricane Sandy Rebuilding Strategy published by the Hurricane Sandy Rebuilding Task Force.

“For all infrastructure programs, agencies should require a plan to monitor and evaluate the efficacy and sustainability of the implemented project, taking particular account of changing environmental conditions such as sea level rise or changing development patterns using risk management tools as well as changing funding sources. Periodic evaluation of effectiveness and fiscal sustainability is essential to ensure that the Federal, State, and local agencies involved in funding infrastructure projects continue to be able to provide funding as needed, as well as to reflect any future changes in the Federal role in funding. In addition, periodic evaluation also allows improvements to existing infrastructure based on new, enhanced scientific understanding of risk or the development of more resilient technological solutions. Fiscal sustainability is important, for example, to ensure that funding both for operations (when required) and for maintaining the asset to a state of good repair is programmed and available to the entity operating the asset.”

If funded, DOH will assure the long-term efficacy and sustainability of projects through ongoing monitoring and evaluation. During implementation, the DOH will ensure that all the appropriate mitigation measures are put into place and meet government standards. DEMHS will be vigilant in doing immediate assessments after future storms events. The agency will provide monitoring or assessment of the structures and equipment to see if they can withstand storm and hurricane conditions. This will be reported to the appropriate State departments to address any failures in structures and equipment.

G. Public Notice and Inclusive Decision Processes (Citizen Participation)

The State has offered several opportunities for public notice and comment on this Substantial Amendment to the 2013 Action Plan including:

- Having a meeting with the mayors and first selectman of affected communities on February 6, 2014 in Fairfield CT
- Posting a survey document for communities to complete and submit to identify an unmet needs that have not otherwise been identified
- Submitting an Allocation Plan to the Connecticut Legislature for the distribution of the second tranche of funding of \$66M and an update of the first tranche of funding in the amount of \$72M
- Posting the full Amendment to the Action Plan on the Department of Housing web site on February 14, 2014 for 30 days of public comment
- Holding a Legislative Public Hearing on the full Amendment, with an emphasis on the Allocation of funds on March 18, 2014

The State's CDBG-DR Action Plan and Amendment planning process has been coordinated through a collaborative effort of local, state, federal and private sector partners.

In the wake of Tropical Storm Irene in 2011, DESPP/DEMHS established the LTRWG, co-led by staff members from each of DECD (now DOH) and DOI and made up of members from state agencies, municipal representatives from the five DESPP/DEMHS geographical emergency planning regions, federal partners, and non-governmental organizations such as the American Red Cross and United Way 2-1-1. As part of the LTRWG's Hurricane Sandy response and recovery work, a State-led Housing Task Force was formed as a component of the LTRWG, and is currently co-chaired by staff from DECD and DSS. The State-led Housing Task Force facilitated cooperation and coordination among federal, State and local governmental offices, non-profit relief and recovery providers and advocates of vulnerable communities; documented unmet housing needs, and has now undertaken the preparation of a Hurricane Sandy Disaster Plan as well as a steady-state disaster plan to promote preparedness for the impact of any future disaster on the housing needs of Connecticut's communities and residents.

Governor Malloy appointed DESPP/DEMHS Deputy Commissioner William Shea as the State Disaster Recovery Coordinator, with the two co-leaders of the LTRWG as his designated coordinators. Together they have worked closely with the FEMA Federal Disaster Recovery Coordinator on a variety of recovery functions, including identifying unmet needs, building community capacity, natural and cultural resources, and housing. At the direction of the Governor's Office, Deputy Commissioner Shea has also convened an Interagency Recovery Coordination Group to coordinate recovery efforts, manage outreach, and bring additional agencies together to support recovery. This interagency initiative

includes: DESPP/DEMHS, DOH, DECD, DOI, DSS, DOE, DOT, DMHAS, DPH, DEEP, DOL, OPM, the Governor's Office, the American Red Cross, and United Way 2-1-1.

This Interagency Recovery Coordination Group continues to coordinate the State's efforts to take full advantage of all available opportunities for federal funding to maximize assistance to the State, its municipalities, residents and various other stakeholders statewide for disaster relief and recovery. The planning work to be undertaken with the Funding and the coordination within the Interagency Recovery Coordination Group will ensure that as many needs as possible are met, and that they are met using the appropriate source(s) of federal funding.

Pursuant to Section 4-28b of the Connecticut General Statutes, the Joint Standing Committees of Connecticut's General Assembly that have cognizance, are required to meet to review Community Development Block Grant Allocation Plans. In preparation for this meeting, a draft Allocation Plan was submitted to the General Assembly on February 14, 2014.

DOH continued to provide information regarding the Disaster Recovery funding and solicited input into the development of the draft Action Plan through such mechanisms as; press releases like the April 19, 2013 from the Governor's Office, briefings similar to the Community Developers Network (CDN) Quarterly meeting on April 24, 2013, and informational meetings allowing for the discussion of funding opportunities, process, and pending issues including the following meetings held: May 3, 2013 in Fairfield, May 3, 2013 in New Haven County, and May 6, 2013 held in Hartford with officials from New Milford.

The draft Substantial Amendment to the Action Plan was made available for a 30 day public comment period, starting on February 14, 2014 and ending on March 16, 2014. A Legal Notice requesting comment on the draft Amendment to the Action Plan was published in two newspapers, including one in Spanish on February 13, 2014. A copy of the legal notice was sent to all the municipalities and public housing authorities, applicable tribes, DOH's Community Partners, and the members of the State Legislature's Appropriations Committee, Commerce Committee, Planning and Development Committee, and the Chairs of the Housing Sub-Committee. The legal notice and the Substantial Amendment to the Action Plan were posted to the designated Hurricane Sandy page on the DOH website for the 30 day comment period. Comments were accepted in written or electronic versions. Hard copies of documents were also made available upon request. Limited English Proficiency (LEP) is addressed by the availability of a Google translation browser button.

Summary of Comments Received and Response

Upon completion of the 30 day comment period, a total of thirteen (13) comments were received; seven (7) from private citizens, five (5) from local government officials, one (1) from a local taxing official.

1. Two comments were received from private citizens requesting funds be made available to assist second homes. *Response: CDBG-DR funds are prohibited by federal regulation from being used to assist second homes. This is not a provision that can be revised by DOH.*
2. One comment was received from a private citizen recommending assistance be provided to “first responders” and for improved “communication”. *Response: The proposed activities do not appear to be eligible activities under the regulations for CDBG-DR funds.*
3. One comment was received from a private citizen who identified a technical correction within a table of information. *Response: The correction has been made.*
4. One comment was received from a private citizen requesting reimbursement for completed mitigation. *Response: As detailed in this Substantial Amendment, DOH proposes to fund such activities.*
5. One comment was received from a private citizen requesting grant assistance for future mitigation. *Response: As detailed in this Substantial Amendment, DOH proposes to fund such activities.*
6. One comment was received from a private citizen recommending against the establishment of grant priorities and sizes by income group; no alternative offered. *Response: As detailed in this Substantial Amendment, DOH intends to use grant priorities and sizes by income group in order to ensure that the federal requirement associated with the expenditure of 50% of the funds under the Low- Moderate-Income National Objective is met.*
7. Two comments were received from local government officials recommending “significant” resources be put in place for mitigation; both home elevations and roadway/bridge infrastructure. *Response: As detailed in this Substantial Amendment, DOH proposes to fund such activities.*
8. One comment was received from a local government official recommending additional funds be allocated for large scale low- and moderate-income multifamily projects. *Response: As detailed in this Substantial Amendment, DOH does not propose to allocate funds for such activities at this time, based on documented unmet need. Should additional information become available in the future, DOH will consider reallocating unspent funds from other categories.*
9. One comment was received from a local government official recommending a “dramatic increase” in the line item for infrastructure and infrastructure-related projects, as well as expressing concern over the 25% local match. *Response: As detailed in this Substantial Amendment, DOH proposes to fund such activities at the current level, which represents more than 50% of the available program funds. Further, consistent with other forms of state and federal assistance, DOH intends to require the 25% local match contribution.*

10. One comment was received from a local government official recommending the specific inclusion of two (2) local infrastructure projects in the Substantial Amendment. *Response: As detailed in this Substantial Amendment, DOH proposes to select infrastructure activities on a competitive basis, and is not prepared to identify any specific projects at this time.*
11. One comment was received from a local taxing official recommending the specific inclusion of one infrastructure project in the Substantial Amendment. *Response: As detailed in this Substantial Amendment, DOH proposes to select infrastructure activities on a competitive basis, and is not prepared to identify any specific projects at this time.*

Substantial Amendments to the Action Plan

A Substantial Amendment to the Action Plan shall be defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures previously identified herein. Specifically, a public notice will be published and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further refined by type of activity and location, if applicable.

Citizens, units of local government, and our community partners will be provided with advanced notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. An electronic copy of the proposed Substantial Amendment will be posted on the official Hurricane Sandy page of the DOH website. Hard copies will also be made available upon request. No less than seven days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval.

Non-Substantial Amendments to the Action Plan

Non-Substantial Amendments are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the State is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are not subject to the public notification and public comment procedures previously identified herein. All Amendments to the Action Plan (substantial and non-substantial) will be numbered sequentially and be posted to the Storm Sandy page on the DECD/DOH website.

Performance Reports

The State must submit a Quarterly Performance Report (“QPR”) through HUD’s Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Within three (3) days of submission to HUD, the QPR must be posted on the State’s official Hurricane Sandy page on the DOH website for public review and comment. The State’s first QPR is due after the first full calendar quarter after the grant award. QPR’s will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported. Each QPR will include information about the uses of funds in activities identified in the Action Plan as entered in the DRGR reporting system. This includes, but is not limited to: project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG-DR Program funds to be expended on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number of housing units complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The State must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the State to affirmatively further fair housing will also be included in the QPR.

During the term of the grant, the grantee will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the approved program and to the grantee’s use of grant funds as well as contracts procured with CDBG-DR funding. This information shall be posted on the State’s official Hurricane Sandy page on the DOH website.

Citizen Complaint Procedures

The State will accept written citizen complaints from citizens related to the disaster recovery programs, Action Plans, Substantial Amendments, or quarterly performance reports. Written complaints should be submitted via email to CT.Housing.Plans@ct.gov or be mailed to:

Program Coordinator

CDBG-DR Program

Department of Housing

505 Hudson Street

Hartford, CT 06106-7106

The State will make every effort to provide a timely written response to every citizen complaint within fifteen working days of the receipt of the complaint, where practical. All citizen complaints relative to Fair Housing/ Equal Opportunity violations involving discrimination will be forwarded to the following

address for disposition: Commission on Human Rights and Opportunities, 25 Sigourney Street, Hartford, CT 06106.

Limited English Proficiency

Requests for this Amendment to the Action Plan or related documents in alternate formats consistent with the provisions of federal requirements related to limited English proficiency must be directed to the ADA (504) Coordinator, of the Department of Housing.

H. Certification of Resilience Standards

The State of Connecticut certifies that it will apply the Infrastructure Resilience Guidelines that are identified in the *Hurricane Sandy Rebuilding Strategy* and identified in this Action Plan Substantial Amendment dated March 23, 2014 to the extent that is practicable and reasonable. In addition, the State will use the methodology, priorities and principals identified in the Connecticut Natural Hazard Mitigation Update when selecting infrastructure projects for funding.