

Affordable Housing Report and Recommendations

January 24, 2019

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Executive Summary

The Affordable Housing Task Force (AHTF) was established by the Board of Alders in March 2018 after the conversion of the Duncan Hotel, which was partly a rooming house, displaced 19 low income people. The Task Force was asked to recommend “actions that the City can take which would increase the number of safe and sanitary SRO units and other low-income housing options.” The members convened public meetings in June, July, September, October, November 2018, and January 2019. There was robust engagement from stakeholders at and between meetings. Over the course of its work the Task Force heard testimony from residents, state and federal policy experts, elected officials, developers, advocates, and activists. AHTF members engaged their own subject knowledge expertise as well as the passionate and creative proposals presented by those engaged in the process. There are six major recommendation areas. Each contains items on which we hope that the appropriate branch of government will act promptly.

1. Ensure Continued Action on the Creation and Preservation of Affordable Housing

Currently a number of City Boards, Departments, Agencies and Commissions work on issues related to affordable housing but there is no single administrative or legislative entity in the city responsible for monitoring, addressing, and making recommendations about affordable housing. Given the scope of the issue in New Haven, in the region, and across the country, New Haven needs an entity with the mandate to examine the impact of City, State, and Federal policy on the ongoing maintenance and creation of safe and affordable housing in the City of New Haven, and to continue to facilitate the effective collaboration between elected officials, City staff, and residents on this important issue.

Recommendations:

- The Board of Alders should create a permanent Affordable Housing Commission to oversee City, State, and Federal policy and results and report annually on the state of affordable housing in New Haven.

2. Ensure that the City has a Wide Spectrum of Housing Options for People at all Income Levels

Each day millions of families live with housing instability. These families pay far more than they can afford to cover their housing costs. They face economic hardship and episodic and chronic homelessness. Research shows that housing instability results in poor outcomes for families in terms of education, employment, health and other related outcomes. Housing instability disproportionately impacts families of color. In New Haven, 41% of all households are housing burdened meaning that they are paying in excess of 30% of their household income toward rent and utilities. The greatest need is at the lowest income tier with over 10,000 families living at or below 30% of the AMI experiencing rent burden. Affordable housing is needed across a full spectrum of lower income levels with those families needing the deepest subsidy accounting for the most units. A vibrant City should offer housing options across the full range, from deeply subsidized to market rate housing.

Recommendations:

- The City should continue to invest in New Haven's affordable housing stock to preserve housing currently in place to ensure that it offers high quality options for families.
- The City, its State, and Federal Delegations should advocate for additional state and federal funding for the development and operation of affordable housing projects and support services.
- The Board of Alders should create a process mandating that developers of market rate projects consult with a recognized affordable housing developer to explore good-faith efforts to include affordable units.
- The City should increase financial support opportunities for landlords in partnership with private firms and nonprofit organizations.
- The City should fund a Case Manager program for tenants, managed by a nonprofit partner, to assist residents in navigating the affordable housing system.
- The Board of Alders and City Plan Commission should make zoning changes to permit a wider range of affordable housing options.
- The Board of Alders should establish a housing trust fund to direct resources into new affordable housing projects.

3. Increase Land Use Efficiency

The zoning code of the City of New Haven continues to pose challenges to the creation of dense and efficient developments that would increase the supply of safe, affordable housing options. In addition, while *de facto* inclusionary zoning has netted the City hundreds of units of affordable housing there is public interest in exploring more formal options.

Recommendations:

- The City Plan Commission (CPC) and its staff should review and investigate the zoning changes proposed by the AHTF.
- The City should increase public awareness of city-owned lots and tax-delinquent properties that could be developed into affordable housing projects.
- The City should tax short-term rentals and contribute proceeds to an affordable housing trust fund.
- The City should fund an inclusionary zoning feasibility study.

4. Work Regionally to Create Affordable Housing, Deconcentrate Poverty, and Promote Integration

The need for affordable housing affects the City of New Haven but there are many ways in which this issue is rooted in the lack of a comprehensive regional or statewide affordable housing policy. Three of the 15 towns comprising Southcentral Connecticut contain more than 78% of the region's affordable housing, a disparity that heightens economic and racial disparities in the County.

Recommendations:

- The City should take a leadership role in the Southcentral Regional Council of Governments (COG) to study and address the disproportionate siting of affordable housing, and initiate a COG compact for the fair distribution of affordable housing in the region.
- The City and partner organizations should advocate that the State allow municipal housing authorities to create housing out of its jurisdiction, and to explore regional/state zoning authority to govern land use development around transit sites.
- The City and partner organizations should advocate that the State make changes to Connecticut General Statutes 8-2.
- The City and partner organizations should advocate to the State for the development of a Housing Affordability Impact Analysis.
- The City and partner organizations should advocate for statewide changes that require a set aside on waitlists for affordable housing developments built in areas of opportunity for families who are currently on urban waitlists.

5. Increase the Ability of People to Stay in Current Housing by Improving the Quality and Stability of Existing Affordable Housing

There are thousands of units of affordable housing in New Haven but not all are safe and habitable. In addition, New Haven has high foreclosure and eviction rates. There is a need to ensure that current affordable housing options are safe, diverse, and of high quality, and that the City develop programs to address the foreclosure and eviction crises facing many of its most at-risk residents. There are a number of actions that can be taken to shore up the Fair Rent Commission and Livable City Initiative, two City agencies responsible for regulatory and enforcement activities.

Recommendations:

- The City and Board of Alders should increase the staffing of the Fair Rent Commission and Livable City Initiative.
- The City and Board of Alders should delegate housing development functions to the Economic Development Corporation of the City of New Haven and return LCI's focus to enforcement activities.
- The City should broaden its relationship with State and federal agencies to investigate and seek criminal penalties for property owners out of compliance with the housing code.
- The City and partner organizations should seek resources to provide grants for a local Rental Assistance Program to assist with security deposits, moving expenses and financial counseling.

- The City and partner organizations should advocate that State support legislation removing the sunset provision for the foreclosure mediation program, and support outreach efforts to ensure New Haven residents know and understand their rights.
- LCI should increase fines, where applicable, to encourage repairs, renovations and lead abatement.

6. Improve Access to Affordable Housing

Beyond the shortage of affordable units, the rental landscape for families in search of affordable housing is further complicated by the lack of a coordinated system to access these units. Because of the lack of an effective regional or statewide allocation program, families that need housing are left navigating a confusing and bureaucratic process. The AHTF heard from many residents who have had difficulty navigating the system to access affordable housing. These stories involved long waitlists, confusing admission criteria and the need to make multiple inquiries and phone calls in order to access limited housing resources. Families experienced periods of homelessness and severe rent burden in the interim. While some have been housed, many remained in precarious housing situations. These challenges are amplified for families with histories of incarceration or eviction.

Recommendations:

- The City and partner organizations should consolidate waitlists for affordable housing, create an accessible local database of information on affordable housing units, and advocate for the implementation of a statewide or regional database that would support applicants' ability to navigate the statewide system of affordable housing.
- The City and partner organizations should invest in a local, user-friendly system of accurate and timely documentation of the existence and availability of its affordable housing resources (i.e., partnerships with landlords, rental assistance programs).
- The City and partner organizations should create down payment/security deposit assistance programs.
- The City and partner organizations should create an eviction prevention program and structured payment program for tenants in crisis so that the housing provider will be paid the rent that is owed as long as it refrains from starting a summary process action.
- The City and Board of Alders should develop a pool of funds to be used for rapid rehousing to alleviate housing instability.

Introduction

The Affordable Housing Task Force (AHTF) was established by the Board of Alders in March 2018 after the conversion of the Duncan Hotel, which was partly a rooming house, displaced 19 low income people. The Task Force was asked to recommend “actions that the City can take which would increase the number of safe and sanitary SRO units and other low-income housing options.” The members convened public meetings in June, July, September, October, November 2018, and January 2019. There was robust engagement from stakeholders at and between meetings. Over the course of its work the Task Force heard testimony from residents, state and federal policy experts, elected officials, developers, advocates, and activists. AHTF members engaged their own subject knowledge expertise as well as the passionate and creative proposals presented by those engaged in the process. There are six major recommendation areas. Each contains items on which we hope that the appropriate branch of government will act promptly.

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1. Ensure Continued Action on the Creation and Preservation of Affordable Housing
2. Ensure that the City has a Wide Spectrum of Housing Options for People at all Income Levels
3. Increase Land Use Efficiency
4. Work Regionally to Create Affordable Housing, Deconcentrate Poverty, and Promote Integration
5. Increase the Ability of People to Stay in Current Housing by Improving the Quality and Stability of Existing Affordable Housing
6. Improve Access to Affordable Housing

1. Ensure Continued Action on the Creation and Preservation of Affordable Housing

Currently a number of City Boards, Departments, Agencies and Commissions work on issues related to affordable housing: The Boards of LCI and the Elm City Communities/Housing Authority of the City of New Haven; the Homelessness and Youth Commissions; and the Community Development Committee of the Board of Alders.

Yet there is no single administrative or legislative entity in the city responsible for monitoring, addressing, and making recommendations about affordable housing. Given the scope of the issue in New Haven, in the region, and across the country, New Haven needs an entity with the mandate to examine the impact of City, State, and Federal policy on the ongoing maintenance and creation of safe and affordable housing in the City of New Haven, and to continue to facilitate the effective collaboration between elected officials, City staff, and residents on this important issue.

Recommendations:

- The Board of Alders should create a permanent Affordable Housing Commission to oversee City, State, and Federal policy and results and report annually on the state of affordable housing in New Haven to the Community Development Committee of the Board. The Commission, like others housed in City Government, can make policy

recommendations, request documents, invite guests, and hold public hearings on affordable housing and related topics.

- The Commission should be staffed by the Executive Director of the Livable City Initiative. The membership should be an odd number of no more than 13, including alternate members.
- Membership should include 1 representative from the Board of Alders; 1 representative from the Mayor's Office; 1 representative from the Economic Development Administrator's Office; 1 representative from the President of Elm City Communities/Housing Authority of the City of New Haven's Office.
- The President of the Board of Alders should have 4 appointments to the Commission. The Mayor should have 3 appointments. Other appointees should be members of community engagement organizations working on affordable housing; New Haven residents; fair housing and other subject experts; members of the development community; and interested stakeholders.
- The Executive Director of LCI should be responsible for carrying out affordable housing goals approved by the Board of Alders. The Executive Director of LCI, in her or his capacity as staff for the Affordable Housing Commission, should be responsible for an annual report to the Board of Alders.

2. Ensure that the City has a Wide Spectrum of Housing Options for People at all Income Levels

Each day millions of families live with housing instability. These families pay far more than they can afford to cover their housing costs. They face economic hardship and episodic and chronic homelessness. Current estimates indicate the national need for affordable housing requires an additional 8 million units. The shortage of affordable housing nationwide has been called a national crisis: the US Department of Housing and Urban Development (HUD) estimates that of all eligible families, only one in four is receiving federal housing subsidy. Connecticut renters face one of the least affordable housing markets in the nation.

Research shows that housing instability results in poor outcomes for families in terms of education, employment, health and other related outcomes. Housing instability disproportionately impacts families of color.

In New Haven, 41% of all households are housing burdened meaning that they are paying in excess of 30% of their household income toward rent and utilities. The greatest need is at the lowest income tier with over 10,000 families living at or below 30% of the AMI experiencing rent burden.

The median rent in the city is \$1,090 and 58% of the units in the city rent for more than \$1,000/month. Based upon New Haven’s median income, an affordable rent is \$750/month and yet fewer than 22% of all housing units rent for this amount.

The housing wage in the city is calculated to be \$25.31/hour. When assessing rent-burdened households in New Haven, there are over 25,000 families living at or below 80% of the area median income who are paying far more than they can afford for living costs.

As summarized in the chart below, affordable housing is needed across a full spectrum of lower income levels with those families needing the deepest subsidy accounting for the highest need. The data suggest that an additional 25,000 affordable units are needed.

Area median income	Number of rent burdened families
At or below 30% AMI	10,700
Between 30 to 50% of AMI	6,230
Between 50 and 80% of AMI	5,212
Greater than 80% of AMI	2,920
Total	25,062

Affordable housing is needed across a full spectrum of lower income levels with those families needing the deepest subsidy accounting for the most units. A vibrant city should offer housing options across the full range, from deeply subsidized to market rate housing.

While part of this solution can come from efforts by the City of New Haven, a regional approach is required to meet the need. This section will present recommendations that may be undertaken within and by the City of New Haven.

Recommendations:

Increase quantity and quality of options

- The City should continue to invest in New Haven’s affordable housing stock to preserve housing currently in place to ensure that it offers high quality options for families.
 - The City should prioritize the efforts of the Elm City Communities/Housing Authority of the City of New Haven/Glendower Group, LCI, and area nonprofit developers in their efforts to recapitalize and revitalize their portfolio.
 - The City and partner organizations should provide support for naturally occurring affordable housing through landlord education, enforcement and public noticing of landlord inspection results.
 - The City should increase penalties and enforcement against landlords who do not maintain their housing to applicable housing quality standards.
 - The City and partner organizations should investigate effects of and provide regulatory oversight over private large portfolio holders.
- The City and its State and Federal Delegations should advocate for additional state and federal funding for the development and operation of affordable housing projects and support services.
 - The City and its State and Federal Delegations should help to accelerate production of city-sponsored affordable units by advocating for additional state and federal funding dedicated to urban development, transit-oriented development and reinvestment in neighborhoods of lower opportunity and appropriation of additional local dollars.
- The Board of Alders should create a process mandating that developers of market rate projects consult with a recognized affordable housing developer to explore good-faith efforts to include affordable units.
 - Such consultation must be documented via certification from the affordable housing provider of good-faith efforts to include affordable units.
 - Good faith efforts must include preparation and review of pro forma budgets demonstrating the feasibility of inclusion of units.
 - If units are deemed not feasible, a statement of non-feasibility must be provided to city officials for review and analysis.
 - Priority for local affordable housing developers shall be given as local developers have a track record of reinvestment in the local community.
- The City should increase financial support opportunities for landlords in partnership with private firms and nonprofit organizations.
 - The City and partner organizations should develop low interest and forgivable loan programs for private landlords providing naturally occurring affordable housing to ensure that the units are maintained and made accessible to New Haven’s lowest income residents.

- The City and partner organizations should institute loan programs for rooming house ownership to ensure that the units are maintained and made accessible to New Haven's lowest income residents.
- The City should fund a Case Manager program for tenants, managed by a nonprofit partner, to assist residents in navigating the affordable housing system, accessing housing and retaining housing and avoiding eviction.
- The Board of Alders and City Plan Commission should make zoning changes to permit a wider range of affordable housing options.
 - The Board of Alders, on the advice of the City Plan Commission and its Staff, should implement zoning changes to permit a wider range of affordable housing options including expanded permitting of rooming houses, allowance for accessory dwelling units, ease minimum lot area requirements; increase in density allowances and more.
 - The Board of Alders, on the advice of the City Plan Commission and its Staff, should develop a detailed plan of action to encourage the development of new, affordable rooming houses in line with current demand, and to make changes in zoning and other regulations to encourage the creation of that number.
 - The Board of Alders, on the advice of the City Plan Commission and its Staff, should identify best practices to ensure that all rooming houses meet minimum standards of safety and legality through enforcement, counseling and financial assistance.
- The Board of Alders should establish a housing trust fund to direct resources earned from development of market rate housing and other leveraged dollars into new affordable housing.
- The City and partner organizations should coordinate efforts with homeless services and economic development initiatives to better support residents.
 - The City and partner organizations should collaborate to support efforts to end homelessness and expand supports for underserved populations.
 - The City and partner organizations should collaborate to enhance programmatic offerings for youth experiencing homelessness.
 - The City and partner organizations should improve conditions in the city's homeless shelters. shelters.
- The City, Board of Alders, and partner organizations should recognize that all housing efforts must be coupled with economic development efforts that seek to raise the income level of New Haven residents overall.

3. Increase Land Use Efficiency

In the 1960s the City's zoning code was reworked to support then current ideas of the "City Beautiful." These ideas called for the maximum amount of open space per housing unit and keeping the number of occupants of each unit as low as possible. The assumption was that low-density housing was the best for people, as opposed to the overcrowding common in big cities. Today, planners have a much better understanding of the benefits of dense city living, including the creativity fostered by diversity of neighborhoods and the economic advantages of efficient use of space.

A considerable number of the citizens who talked with us suggested changes in our current zoning code that would allow landowners and zoning officials to make more sensible land use decisions. We compiled a list of these recommendations and chose those that we felt would improve the city, but not significantly injure citizens who had relied on the old rules, i.e. no glue factories in residential neighborhoods. Since we are not zoning experts, we suggest that the Board of Alders request that the City Plan Commission (CPC) and its staff review this list and write appropriate language to change our Zoning Code to incorporate these ideas, as well as reporting to the Board, the Commission's views concerning the non-zoning suggestions. We should note that all of the suggested zoning changes have been adopted by many other municipalities, so the Commission, if it can, should let us know how they have worked out.

The majority of speakers to the AHTF strongly recommended that the City adopt some form of Inclusionary Zoning. This is usually defined as a legal requirement that builders of new large-scale market-rate housing projects provide reduced rental cost units to allow middle- and low-income tenants to move into the projects. Some cities permit builders to pay a fee to a municipal affordable housing fund in lieu of actually providing the housing themselves. For a number of years, the City of New Haven, like others, has negotiated individual deals with developers that require them to provide such house and has been quite successful in achieving its goals.

Many members of the public told us that they think the City should have a formal policy both because it would be fairer, but also because the building boom here is so significant, the City could do better with an ordinance.

AHTF members felt that they lacked the professional expertise to make a specific recommendation to the Board of Alders, but rather would ask the Board and the Administration to fund a feasibility study to determine how the City could best maximize the numbers of affordable units stemming from these new projects before implementing a new Inclusionary Zoning ordinance. However, given the urgency of the affordable housing crisis AHTF members ask that the study resulting in a proposed Inclusionary Zoning ordinance be completed by the end of 2019.

The City Plan Commission should submit draft regulations in accordance with the following recommendations to the Board of Alders in a timely and efficient manner:

General Zoning:

- Amend zoning ordinances to allow a broader definition of “family member,” including, but not limited to, increasing the number of non-related roommates permitted.
- Increase number of rentable rooms in single family homes from 1 to 2.
- Encourage the construction of “mother-in-law” apartments and backyard cottages, both of which are forbidden by current zoning ordinances.
- Eliminate parking requirements for new housing developments and consider imposing maximum parking caps accompanied by violation fees.
- Encourage congregate housing by amending zoning ordinances to allow cooperative living units.
- Encourage the development of “tiny” units.
- Amend zoning ordinances to allow housing where not currently allowed, e.g., in areas zoned BB and BE.

Land Inventory:

- The City should increase public awareness of city-owned lots and tax-delinquent properties that might be made available for development.
- The City should create an inventory of privately-owned vacant lots and make efforts to facilitate their redevelopment.
- The City should convert city-owned parking lots into affordable housing where appropriate.

Administrative:

- The City should pursue private financing to develop affordable housing, such as Capital for Change.
- The City should tax short-term rentals and use proceeds to fund affordable housing subsidies.
- The City should obtain permission from the State to allow Housing Authorities to create low-income housing outside of central cities.

Inclusionary Zoning:

- The Board of Alders and the Administration should fund a feasibility study to determine how the City could best maximize the numbers of affordable units stemming from new market-rate development.
- The Board of Alders should make approval of new market-rate development projects contingent upon inclusivity principles based upon framework developed by the feasibility study and resulting ordinance.
- The City Plan Commission should consider granting density bonuses for low-income additions to market-rate developments.

4. Work Regionally to Create Affordable Housing, Deconcentrate Poverty, and Promote Integration

The need for affordable housing affects the City of New Haven but there are many ways in which this issue is rooted in the lack of a comprehensive regional or statewide affordable housing policy. In the absence of such coordinated efforts, affordable housing needs for the region and state are borne in the urban centers with the surrounding communities contributing little to solve the needs of CT’s families.

Southcentral Connecticut¹ is a 15-town region with a population of 570,000. New Haven is the only municipality with the majority of its households as renter households (63%). The percentage in the other towns in the region range from a low of 9% in Woodbridge to 40% in West Haven.

When considering affordable rental units, the discrepancies become even starker. Only about 13% of the 240,575 units in the region are subsidized with New Haven accounting for the vast majority (56% of the region’s affordable units are in New Haven).

By CT statute, every city and town should have a minimum of 10% of its housing units affordable. In this region, only 3 municipalities meet this threshold: New Haven (32%), Meriden (16.1%) and West Haven (13.2%).

Municipality	% affordable units
Bethany	0.59%
Branford	3.24%
East Haven	7.70%
Guilford	2.38%
Hamden	8.19%
Madison	1.62%
Meriden	16.06%
Milford	5.35%
New Haven	31.77%
North Branford	2.29%
North Haven	5.08%

¹ Bethany, Branford, East Haven, Guilford, Hamden, Madison, Meriden, Milford, New Haven, North Branford, North Haven, Orange, Wallingford, West Haven and Woodbridge.

Orange	1.37%
Wallingford	4.13%
West Haven	13.19%
Woodbridge	1.21%
Total	12.96%

Source: CT DOH Affordable Housing Appeals List
https://www.ct.gov/doh/lib/doh/amended_final_appeals_summary_2017.pdf

This data suggests that the region’s solution to the affordable housing crisis cannot rest solely on the efforts of the municipalities that have already been providing this needed service. New Haven must play a role in regional and statewide advocacy efforts to hold its neighboring cities and towns accountable for meeting the needs of CT’s lower income families.

According to the Greater New Haven Community Index (2016), “the region has many assets including access to jobs, the arts, health care and world-class educational institutions.” However, due to the lack of affordable housing in many communities, low income and disproportionately communities of color, are relegated to distressed neighborhoods. The City of New Haven and this entire region must simultaneously invest in distressed communities while also developing housing opportunities in areas of opportunity.

Creating incentives and removing barriers to developing housing opportunities in other municipalities can be addressed through revisions to state zoning enabling statutes and New Haven officials should take active steps to advocate for these needed changes.

Recommendations:

- The City should take a leadership role in engaging the Southcentral Region Council of Governments to study and address the disproportionate siting of affordable housing and initiate a COG compact for the fair distribution of affordable housing in the region.
- The City and partner organizations should advocate for the state to allow Housing Authorities to create housing outside of its jurisdiction and to explore regional/state zoning authority to govern land use development around transit areas.
- The City and partner organizations should advocate to remove references to considering community character in the Zoning Enabling Statue (C.G.S. 8-2); strengthen language that local regulations must include zoning for housing to meet the needs identified in the State consolidated plan; and establish deadlines by which municipalities must demonstrate compliance with sanctions imposed.
- The City and partner organizations should advocate to the State for the development of a Housing Affordability Impact Analysis. Prior to enacting state or local regulations, require an analysis of the impact of that action on the housing affordability in the local or regional area.

- The City and partner organizations should advocate for statewide changes that require a set aside on waitlists for affordable housing developments built in areas of opportunity for families who are currently on urban waitlists.

5. Increase the Ability of People to Stay in Current Housing by Improving the Quality and Stability of Existing Affordable Housing

The AHTF was charged with determining actions the City can take to increase safe and sanitary SROs and other low-income housing options.

Discussions during public and AHTF meetings led to the City researching opportunities to provide additional resources to “shore up” the existing housing stock through increased enforcement and provide subsidies for those residents in need of funds to secure decent affordable rental units.

In addition, New Haven has the highest foreclosure rate in the State. While the State’s foreclosure mediation program assists homeowners in modifying their mortgages and staying in their homes, this program is due to sunset in June 2019. Losing this program could result in many New Haven residents who live in existing affordable housing being foreclosed upon and thrust into an unaffordable rental market.

Inventory

There are currently more than 28,000 units of rental housing in the City of New Haven. As the City continues to lose homeowner occupied units to private acquisitions and foreclosures, we have struggled to stabilize homeowner disinvestment in competition with speculators and privately held Limited Liability Corporations. Several factors have contributed to this loss. During its early years, the Livable City Initiative (LCI) eliminated over one thousand structures in an effort to eliminate blight throughout the city, which led to a loss of approximately fifteen hundred housing units. Many of those units were older two-family residences with third floor occupancy capacity which often housed family members and tenants that could afford to cover the cost for housing accommodations.

These properties were located predominately in the heart of New Haven’s working-class neighborhoods of color: Dixwell, Newhallville, Fair Haven, and the Hill. Additionally, the 2008 housing crisis which began with mortgage dealers who issued mortgages with terms unfavorable to borrowers who were often families that did not qualify for ordinary loans. Many times, these were working class families of color. Some of these so-called subprime mortgages carried low “teaser” interest rates that eventually ballooned to double digit rates in later years. Some mortgages included prepayment penalties that made it too expensive to refinance.

Many of these properties fell into foreclosure and were prime real estate targets for the impending industrial rental housing industry. These factors created a vacuum which has been filled by the industrial rental housing complex. The influx of housing developers purchased significant numbers of housing units in the New Haven’s working-class neighborhoods.

After purchasing these properties, many of which were in sub-standard condition, the developers systematically uprooted tenants by increasing rents. Hundreds if not thousands of these units did not qualify as safe or affordable.

The AHTF received considerable information about the extreme shortage of rooming housing/SRO housing in the city. Many other cities are working to increase their number of rooming houses, since there is little federal aid for singles housing and such houses can be successfully run with rental income only.

The City of New Haven has two agencies responsible to ensure housing in the city is safe, healthy and affordable for residents seeking quality housing options: the Fair Rent Commission and the Livable City Initiative (LCI). Both agencies are governed by Board of Alders-approved Ordinances and an appointed Board and must comply with federal, state and municipal regulations.

The Fair Rent Commission

During his presentation to the AHTF Michael C. Santoro (Connecticut Department of Housing, Policy, Research and Housing Support) stated that "... the most powerful agency you have to deal with maintaining affordable housing is that guy right there – the Fair Rent Commission."

The Act enabling Connecticut Municipalities to create Fair Rent Commissions was adopted by the General Assembly in October 1970 (Public Act 274 SS 1). The Fair Rent Commission was enacted by the City of New Haven Board of Alders in December, 1970 for the purpose of controlling and eliminating excessive rental charges on residential property within the city of New Haven in recognition of the compelling need for rent stabilization for the duration of the severe housing shortage in New Haven (Code of Ordinances 12 3/4-1, amended and adopted December 13, 1984, Chapter 12 3/4 Fair Rent Practices 12 3/4).

We believe the work of this agency should be supported by ancillary agencies including the Livable City Initiative and Office of Building Inspection and Enforcement to ensure its objectives are met and the needs of residents seeking services are addressed collaboratively.

For many years the Fair Rent Commission has operated with limited staff and resources to respond to and provide services to residents seeking assistance with landlord/tenant issues. These limitations have stifled the Commission's ability to remain proactive in its attempt to identify and sanction landlords and property owners that are out of compliance with Housing Code Standards and Practice. The AHTF believes that a true commitment toward staffing and funding the Commission would assist those in need dramatically.

The Livable City Initiative

The Livable City Initiative enforces the housing code. The City of New Haven should consider instituting procedures through in-house revision and possible legislative action to expedite the housing code compliance process.

As part of this proposal, fines should be levied for non-compliance within prescribed deadlines; fines should be executed immediately, particularly for violations reported to be remedied in hours and days. Failure to pay these fines should initiate liens on property. Furthermore, in cases where a property is abandoned, this housing should be considered as low-income housing options, including SRO housing.

The Livable City Initiative currently operates as the city's "One Stop Shop" for all neighborhood, property, enforcement, and community activity. Although this role serves the neighborhoods well it has taken away from LCI's primary responsibility for code enforcement and blight remediation. The AHTF agrees that more concentrated resources for housing code and blight remediation should be enhanced at LCI to ensure compliance with landlords and property owners to improve the quality and stability of housing in the City of New Haven.

For several years LCI has become more active in the development of housing in response to preserving affordability in concentrated neighborhoods. The agency has completed several successful projects utilizing federal, state and local resources and should continue to administer the City's CDBG allocation activities, however we feel a greater impact can be made with a collaborative approach.

Economic Development Corporation-New Haven was established to serve as a redevelopment agency working in conjunction with City government, partners, and stakeholders to redefine and establish goals and objectives for development in the City of New Haven. We believe establishing a working collaboration between the two agencies will broaden opportunities for concentrated development within neighborhoods and provide greater opportunity to utilize private/public resources to advance the city's agenda for affordable units throughout the city. Utilizing existing resources through acquisitions, land transfers and development agreements will provide the leverage required to participate in housing and community development projects.

Conclusions:

- The SRO inventory was and continues to be negligible at best and developing such housing is an expensive task.
- The efforts by the City will never meet the desired quantity of affordable housing units and a regional approach is warranted.
- The Livable City Initiative Housing Code and Enforcement Unit may have a significant impact on affordability and should consider strengthening the housing code inspection violations that would issue immediate fines for non-compliance, particularly in those instances where violations were ordered to be repaired in hours/days.

Recommendations:

- The City and Board of Alders should increase the staffing and resourcing of the Fair Rent Commission and Livable City Initiative.
- The City and Board of Alders should delegate housing development functions to the Economic Development Corporation of the City of New Haven and return LCI's focus to enforcement activities.
- The City should broaden its relationship with State and federal agencies to investigate and seek criminal penalties for property owners out of compliance with the housing code.
- The City and partner organizations should seek resources to provide grants for a local Rental Assistance Program to assist with security deposits, moving expenses and financial counseling.
- The City and partner organizations should advocate that the State support legislation removing the sunset provision for the foreclosure mediation program, and support outreach efforts to ensure New Haven residents know and understand their rights.

- LCI should increase fines, where applicable, to encourage repairs, renovations and lead abatement.
- The City should advocate to the state for the services of the Fair Rent Commission to be expanded to cover the Greater New Haven region.
- The City and partner organizations should support legislation which removes the sunset provision for the foreclosure mediation program and support outreach efforts to ensure New Haven residents know and understand their rights.

6. Improve Access to Affordable Housing

Beyond the shortage of affordable units, the rental landscape for families in search of affordable housing is further complicated by the lack of a coordinated system to access these units. Each public housing authority, state entity offering units and private developer maintains their own unique waitlists. While CT's 211 system offers a platform by which a family can register to receive alerts statewide when a Housing Choice Voucher waitlist opens, no such system exists for public housing, tax credit or other affordable units.

This leaves families that need housing in the situation of having to search for and make numerous calls to various entities so that the heads of household can access the information about current openings. The complicated and multi-level housing system that has differing income eligibility requirements, various waitlist eligibility policies and limited time periods within which to apply makes this process difficult, if not impossible, to navigate.

Streamlining the system of accessing housing, especially at the deeply affordable level, that makes the process of achieving a positive outcome for families should be a priority. More than that, insuring that this system is user friendly and responsive, as well as producing family-centered outcomes and greater permanence for them is essential to reducing a first or future instance of homelessness.

To be sure, when the income of families is insufficient to access housing at levels above the 30% level, which is considered deeply affordable, there is a greater threat of homelessness.

Sometimes, it is episodic in nature and can be lessened when families have access to immediate social supports that can stave off an eviction or allow them to move into a unit with help with security deposit, first month rents or utility charges.

Such minimal investments may allow families to retain needed housing and avoid an eviction and possible homelessness. According to Eviction Lab at Princeton University, as of 2016 New Haven has double the national eviction rate – 4.05%.

However, they do not address the core and underlying need for increased income, increased skills and support for families so that they are not in crisis, forced to face a return to homelessness or feel as if they have failed because of limited employment opportunities.

The priority in this case, is to forge and develop initiatives within the recommended system that will allow for the design and implementation of social service enhanced affordable housing – employment and training programs – that offers “coaching and follow up support” to families and the development of partnerships with landlords in that housing to keep families housed. This might also involve specific work with the Fair Rent Commission and other city departments.

Episodic homelessness may be lessened when families have access to immediate supports that can stave off an eviction or allow them to move into a unit with help with security deposit, first month rents or utility charges. By making minimal investments, families may retain needed housing avoiding an eviction and possible homelessness.

Finally, residents benefit from education on rental processes and on how to be a good tenant. Modest investments in programs that educate tenants can foster positive landlord-tenant relationships and assist renters in maintaining their housing.

The AHTF heard from many residents who have had difficulty navigating the system to access affordable housing. These stories involved long waitlists, confusing admission criteria and the need to make multiple inquiries and phone calls in order to access limited housing resources. Families experienced periods of homelessness and severe rent burden in the interim. While some have been housed, many remained in precarious housing situations. These challenges are amplified for families with histories of incarceration or eviction.

The City of New Haven should invest in a local system of accurate and timely documentation of the existence and availability of its affordable housing resources (i.e., partnerships with landlords, rental assistance programs). This system should be user-friendly and easy for residents to access and navigate. This may involve using information gleaned from individuals - advocates, housing organizations and state/federal officials who offered testimony of other municipalities that have been successful in this area.

Recommendations:

- The City and partner organizations should implement a system that consolidates waitlists for affordable housing.
 - The City and partner organizations should pursue a coordinated process for accessing New Haven-based affordable housing units.
- The City and partner organizations should invest in a local, user-friendly system of accurate and timely documentation of the existence and availability of its affordable housing resources.
 - The City and partner organizations should develop an accessible local database of information on affordable housing units.
 - The City should further advocate to the state for the implementation of a statewide or regional database that would support applicants' ability to navigate the statewide system of affordable housing
 - The City should collaborate with formal and informal partners to identify and develop relationships with prospective landlords and local housing development groups and homeless service providers.
 - The City should develop mechanisms for the licensing landlords, working with the Fair Rent Commissions and developing new policies and procedures for working with state and municipal partners to increase access to deeply affordable housing units.
- The City and partner organizations should create an eviction prevention program and consider facilitating structured payment plans for tenants in crisis to permit more agreements to prevent evictions.
- The City and Board of Alders should develop a pool of funds to be used for rapid rehousing to alleviate housing instability.
 - The City and Board of Alders should create down payment/security deposit assistance programs. This may involve surveying housing organizations that

provide such support or other governmental entities – other cities and the State of Connecticut – so that the eligibility is clear and will be used to support families that are in the best financial situation to succeed. Along with this, it may involve developing a social service follow up program to ensure that the contact with the family is maintained at regular intervals to monitor progress.

- The City and Board of Alders should develop a pool of funds to be used for rapid rehousing to alleviate housing instability. This may involve reviewing the results of the Secure Jobs Initiative and its use of rapid rehousing and employment and/or training to design an approach that would increase income or other initiatives, as the percentage financial investment decrease, to insure the success and longer-term stability for the families selected for this type of housing.