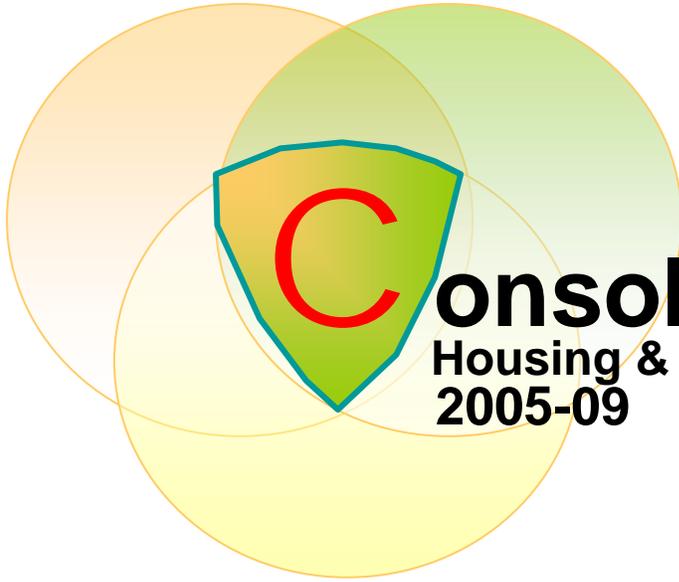


City of NORWALK



Consolidated Plan *for* **Housing & Community Development** **2005-09**

Submitted by
THE NORWALK REDEVELOPMENT AGENCY
125 East Avenue
Norwalk, CT 06856



3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

The Executive Summary is optional, but encouraged. If you choose to complete it, please provide a brief overview that includes major initiatives and highlights that are proposed throughout the 3-5 year strategic planning period.

3-5 Year Strategic Plan Executive Summary:

Introduction

The Economic Nexus of Housing and Community Development for Norwalk

This *Consolidated Plan for Housing and Community Development* (Plan) begins with the observation that many of the best reasons for making investments in sectors of our community which are traditionally thought of in the context of charity are, in fact, based on the community's own economic self-interest.

It is interesting to note, for example, that the business community is becoming a more vocal advocate for affordable housing as their attempts to locate in proximity to a high-quality workforce are frustrated by that workforce's ability to afford area housing.¹ Locational decision-making is based chiefly on proximities to quality workforces.² And throughout recent history, Connecticut, despite its tax and regulatory structure, has been fairly successful at landing large employers. But, increasingly, many regions around the world besides ours have large, well-educated, and capable workforces. While the US graduated 65,000 engineers in 2003, for example, China graduated 665,000.³ And so, more than ever, the most humane economic development strategy for American cities today happens to also be the one with the best potential. Norwalk's best hope is to invest in its people – in their education, in their employment, and in their housing and quality of life. In addition to the direct benefits to people's lives of such a strategy, it is also increasingly clear that this approach produces fiscal and quality-of-life benefits to the city as a whole, creating not only better lives, but better places in which to live.

Cultivating the Workforce; Cultivating the Grand List

In his book *The Work of Nations*, former Labor Secretary Robert Reich puts the future work of nations into three categories: routine production (increasingly what is 'produced' in this category in our country is data), in-person service (retail sales, waiting tables, custodial services, etc.), and what he calls symbolic analysis.⁴ The first two categories have the lowest wages and the least job security, and, in the context of global trade and technological innovation, are the least likely to remain long in our economy. The third, the 'symbolic analyst,' is the type of worker that relies on education, knowledge, and a diverse skill set. Research from The Workplace, Inc. states that, with a low unemployment rate, and a major imminent demographic shift out of the labor force by the baby boomers, the problem facing the shrinking labor force increasingly is not the quantity of jobs. Rather, it is and will continue to be the quality of jobs, as labor continues to get either outsourced to cheaper labor markets overseas, or made obsolete by technological innovations here at home, each of which will exert downward pressure on wages in those sectors. The primary hope for the American (and Connecticut) workforce, if it can't be cheaper, is to be better: better educated, more technologically able, more efficient, and more productive, so that it can be first at the table for the global economy's most knowledge-based, high-quality jobs.

This is especially true for Norwalk, which for years has enjoyed the regional role of a work center, where high-value commerce and industry and a quality workforce converged to create the synergy of our local economy. As a consequence, it has enjoyed a grand list made up of over 20% commercial/industrial property -- twice to three times the rate of its neighbors.

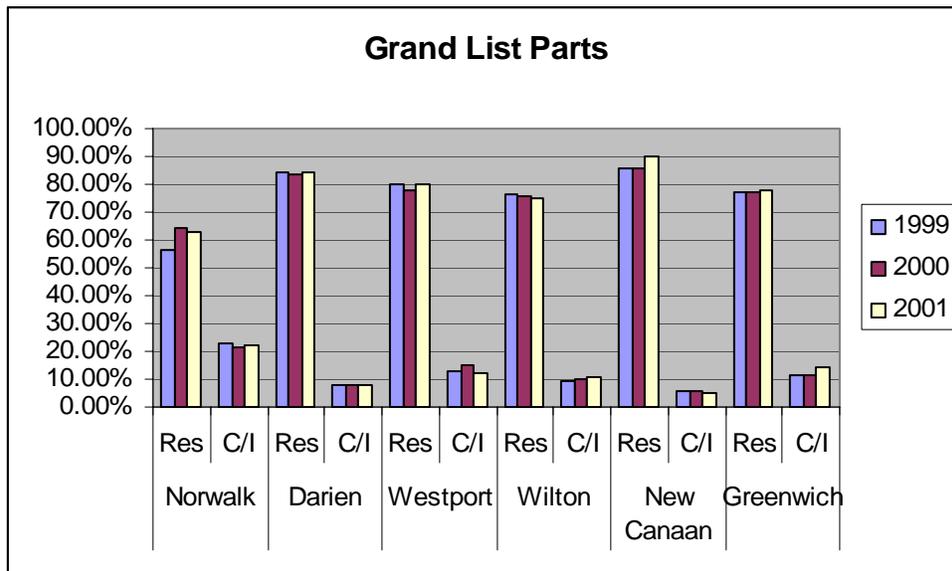


Figure 1: Grand List Parts
Source: Connecticut State Office of Policy and Management

To preserve this golden egg-laying goose, Norwalk needs to be concerned about two things: first, are we continuing to produce – and maintain – a quality workforce, and, second, can we house that workforce? The success of Norwalk's community, therefore, hinges significantly on its ability to fully economically engage its population, both in a preparatory sense, and in a lifelong sense. And, Norwalk must ensure that this most precious economic asset -- its people -- can reside in decent housing and a suitable living environment. Norwalk must eliminate the achievement gap of its youth,

re-engage all its subpopulations in the socioeconomic life of its community, and de-concentrate poverty by fostering more expansive housing opportunity and better neighborhoods. These are the three overarching themes of this Plan.

THEME ONE: Closing the Achievement Gap

Norwalk invests substantial resources in education. According to the most recent data available, we rank 28th -- within the top 1/5th -- of per pupil expenditures in a state that, in turn, ranks 4th in the nation.⁵ And we are currently engaged in an ambitious physical renovation program of our school buildings. On the other hand, child abuse and neglect cases continue to rise⁶, 50% of Norwalk 4th graders are not meeting the state goals in reading and math⁷, 4,300 Norwalk children are enrolled in HUSKY⁸ although virtually no pediatrician in Norwalk accepts it,⁹ and one out of every ten Norwalk students never graduate high school.¹⁰ While improvements can always be made at the class-room level, we must also recognize that much of a child's success in school depends on to what extent s/he comes to school prepared and able to learn. If the child is hungry, sick, abused, or unsafe during out-of-school time, even the best teachers or classrooms are unlikely to deliver that child into a successful adulthood. Because of the neighborhoods and communities that are affected by each child's success or failure, Norwalk has identified CLOSING THE ACHIEVEMENT GAP as a goal over the next five years, and the Plan recommends community development (CDBG) investments that address that goal, including such things as after school programs, violence prevention, parent education, and jobs for youth.

THEME TWO: Economic Re-engagement

While Norwalk plans for the economy of the future and prepares its young people to enter and compete effectively in it, pockets of our city have, unfortunately, already been left behind, or are struggling on the margins of the economy, disengaged. These 'pockets' include both people and places, and often overlap, concentrating, entrenching, and exacerbating the effects of poverty as further discussed below. The frail elderly, prisoners who have served their time and are re-entering society, recovering addicts, dislocated workers, the homeless, the illiterate, and the working poor all can be liabilities to their communities or, with effective community investment in their success, be converted to assets – to their families, neighborhoods, and their communities at large. Accordingly, the Plan calls for initiatives that will promote the ECONOMIC RE-ENGAGEMENT of those segments of our community whose disadvantages could easily deprive not only them, but also us, of the economic and social value of lives lived to their full potential. Some of the initiatives proposed are business development, addiction recovery, and senior services.

THEME THREE: Deconcentration of Poverty

Regions with strong central cities regularly outperform those with weak ones.¹¹ Without vital downtowns and strong central cities, an ebbing tide lowers all boats in a region, making it in everyone's interest not to allow poverty to concentrate. When poverty becomes concentrated in a specific geographic area, a negative synergy occurs whereby typical symptoms of poverty (crime, ill health, chemical addiction) escalate at disproportionate rates and perpetuate themselves over time. A map demonstrating this affect with respect to incidence of crime is included later in this document, along with additional maps which confirm that, at a local level, Norwalk has (like most cities) gradually allowed its downtown to become an area of concentrated poverty, and that, at a regional level, the region has concentrated its low- and moderate-income (LMI) population in Norwalk. The downward-spiral of poverty concentration is illustrated in the figure below.

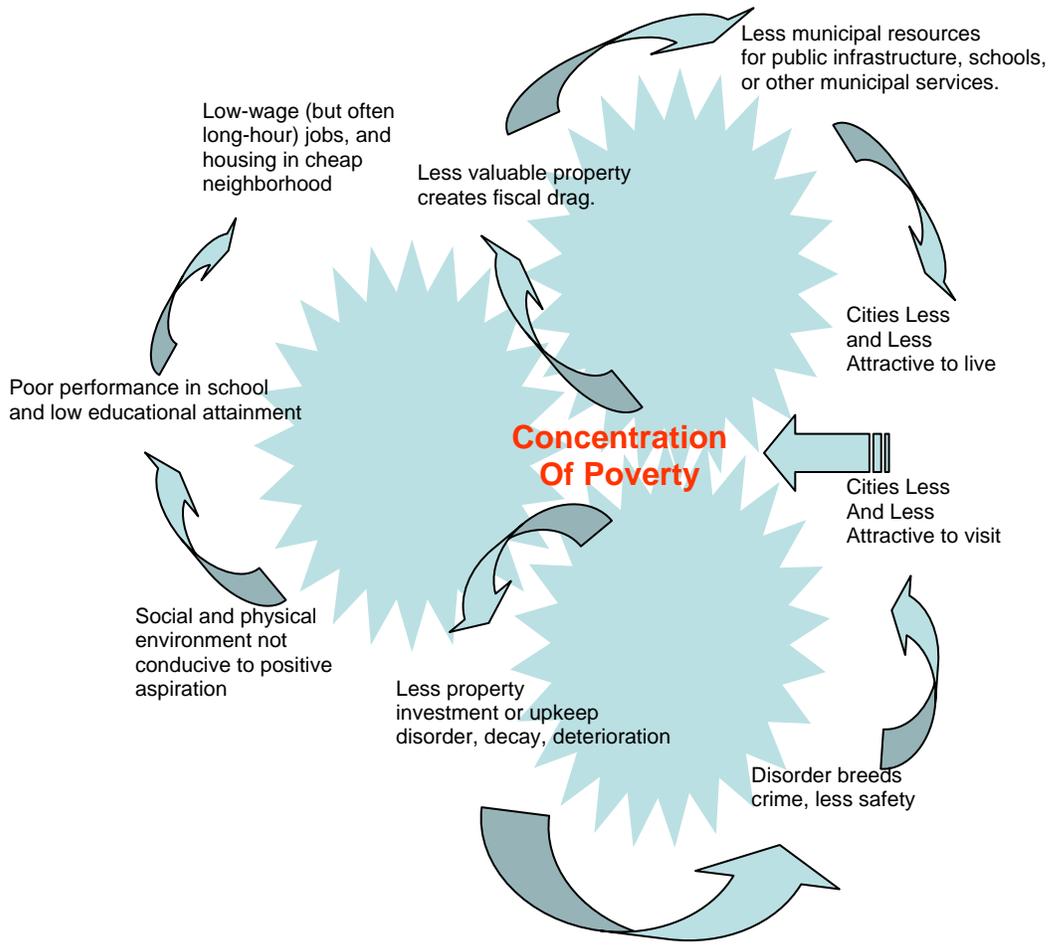


Figure 2: Poverty Concentration

This problem can be approached in three ways: one can attempt to disperse the LMI population to areas of lower LMI concentration (something that the US Department of Housing and Urban Development – ‘HUD’s’ – Section 8 program aims at), or it can attempt to attract upper-income persons to areas of LMI concentration by making those areas more attractive (something downtown redevelopment and neighborhood revitalization often aim at, and which SoNo is a successful example of). The third way, of course, is to attempt to raise the LMI population out of poverty, in-place, a much more difficult, long-range endeavor. However, sometimes pursuing this third approach can yield some of the objectives of the second, by attracting new residents through the physical neighborhood manifestations of the target population's diminishing poverty. Because poverty -- especially when geographically concentrated -- is a vicious cycle that affects the whole community, the Plan has identified the DE-CONCENTRATION OF POVERTY as an ongoing goal over the next five years, and proposes place-based investments in housing and urban neighborhoods to address that goal. Specific output targets for these three goals are in the Objectives Table.

NEEDS							Priority
I	REVERSE THE ACHIEVEMENT GAP						
1	After/Out-of School Programs	Red					H
2	Teen Space						H
3	Language/Literacy Development	Yellow					H
4	Kids Health (Mental, Dental, Physical, Lead Hazard Prevention)	Red	Yellow	Blue			M
5	Violence/Gang Prevention	Red	Purple				M
6	Parent Education	Red	Yellow				M
7	Child Care	Yellow					M
8	Children with Disabilities	Yellow	Red				L
9	Jobs for Youth	Red					H
10	LMA Facilities Serving Children	Red					H
II	ECONOMIC RE-ENGAGEMENT						
11	Job Training	Red	Orange	Purple			H
12	Language/Literacy Development	Yellow					H
13	Business Development	Orange	Green				M
14	Child Care	Yellow					M
15	Transportation	Yellow	Purple				L
16	Live-where-you-work	Orange	Green				H
17	Senior Services	Yellow					M
18	Addiction Recovery	Purple					H
19	Prisoner Reentry	Purple					M
20	Violence/Gang Prevention	Red	Purple				M
21	Homelessness	Blue	Purple				M
III	DECONCENTRATE POVERTY						
22	Obesity	Red	Cyan				L
23	Pedestrian initiatives	Purple	Cyan				L
24	Sanitation	Cyan					M
25	Empty Storefronts	Orange	Cyan				L
26	Neighborhood Centers Improvements	Orange	Cyan				H
27	Transit Nodes	Purple	Cyan	Green			M
28	Crime Prevention / Security through Lighting, other enhancements	Cyan					H
29	Better Sidewalks	Cyan	Purple				M
30	Wall Street	Green	Blue	Orange	Cyan	Purple	L
31	Historic Preservation	Blue	Cyan				M
32	Urban Parks	Purple	Cyan				M
33	Affordable Housing	Green	Blue				H
34	Housing Placement Assistance	Green					H
35	Rehab of Affordable Housing	Blue					H
36	Homeownership Initiatives	Green					H
37	HOPE VI	Green					H
38	Housing for Disabled	Green					M
39	Housing for Elderly	Green	Blue				H
40	Weatherization	Blue					M
41	Supportive Housing	Green					M

OBJECTIVES TABLE

OBJECTIVES

- A** Support activities that help close the achievement gap for youth via after- and out-of-school opportunities to include program activities, safe places, and career advancement initiatives.
- B** Respond to the severe affordable housing shortage in our region by supporting efforts to increase and/or reinforce mixed income housing development, housing placement assistance, supportive housing, and housing for persons with disabilities.
- C.** Support renovation, weatherization, lead hazard reduction and other improvements to existing affordable housing stock including housing for seniors and persons with disabilities
- D** Support programs and initiatives which strengthen families in the community, via child care, health care, literacy, senior services, transportation, or by lead safe homes, or by barrier-free environments or opportunities.
- E** Stimulate downtown economy through business development initiatives that create or retain jobs held by LMI persons, and/or are located in LMAs, and/or are jobs held by Norwalk Residents
- F.** Support systems which provide effective fresh starts to members of the community which have experienced severe set backs from which they are trying to recover and constructively reengage with society.
- G.** Promote neighborhood beautification with initiatives that make places clean and safe, and more reflective of their historic character.
- H** Develop with DPW pedestrian improvements in LMAs interconnecting urban parks, transit node(s), and existing sidewalk networks to be marketed and programmed via the departments of Park and Rec, and Health to promote public health and fitness.
- I** Plan, administer, monitor, and report on all aspects of Norwalk's housing and community development activities under its CDBG Program and this Plan.

		units	target
OUTPUT TARGETS			
A1	After School Participation	LMI Kids	275
A2	Out-of-School / Summer Programs	LMI Kids	275
A3	Dev. of LMA Facilities Serving Children	Facilities	2
A4	Career Advancement Initiatives	LMI Kids	500
B1	Increase	Housing Units	20
B2	Reinforcement	Housing Units	20
B3	Placement	Households	20
B4	Permanent Supportive Housing	Housing Units	20
B5	Special Needs Housing	Housing Units	9
B6	Senior Housing	Housing Units	4
C1	Renovation	Housing Units	70
C2	Weatherization	Housing Units	20
C3	Lead Hazard Reduction	Housing Units	5
C4	Security Enhancements; other	Housing Units	5
D1	Child Care	Facilities	1
D2	Health Care	LMI Kids/Facilities	110-3
D3	Literacy	Peoples	150
D4	Senior Services	Seniors	38
D5	Transportation	Routes	2
D6	Facilities Improvements (lead/barriers)	Facilities	3
E1	Business Development Job Creation	Jobs	2
E2	Business Development Job Retention	Jobs	2
E3	Business Development in LMAs	LMAs	1
E4	Job Creation/Retention for Residents	Jobs	3
F1	Addiction Recovery	People	157
F2	Prisoner Re-entry	People	300
F3	Homelessness	Beds/Services/Renov	13-197-1
F4	Job Training	People	200
G1	Neighborhood Centers	LMAs	2
G2	Sanitation	LMAs	1
G3	Wall Street	LMAs	2
G4	Historic Preservation	Res/Com Unit	5
H1	Pedestrian Initiatives	Live' Initiatives	1
H2	Anti-obesity Initiatives	Live' Initiatives	1
H3	Urban Parks	LMAs	3
H4	Transit Nodes	LMAs	3
I1	Housing Project Management	Housing Units	100
I2	General Program Administration	Program Year	1
I3	Neighborhood Coordinator	Program Year	1

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

General Questions

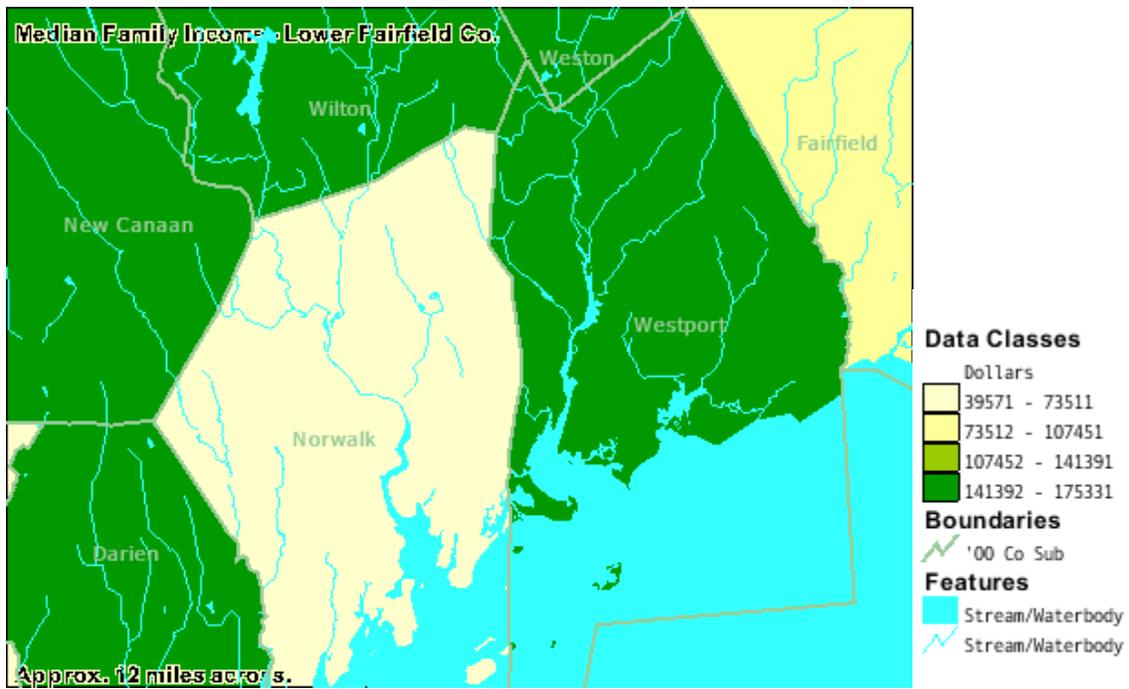
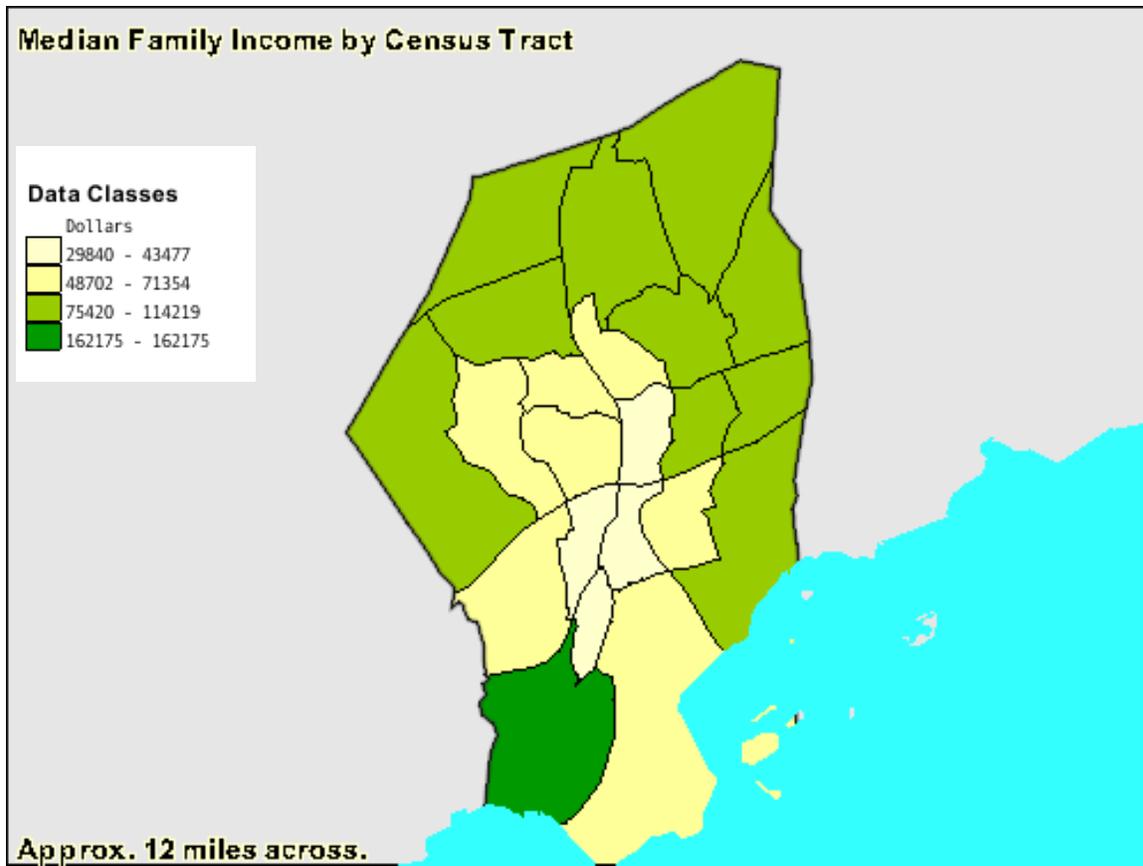
1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).
3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic Plan General Questions response:

1. Attached or below are a series of maps describing the geographic areas of Norwalk, including low income families and minority concentration. One map, from a recent Annual Plan, shows a typical distribution of Norwalk's CDBG allocations relative to those areas.

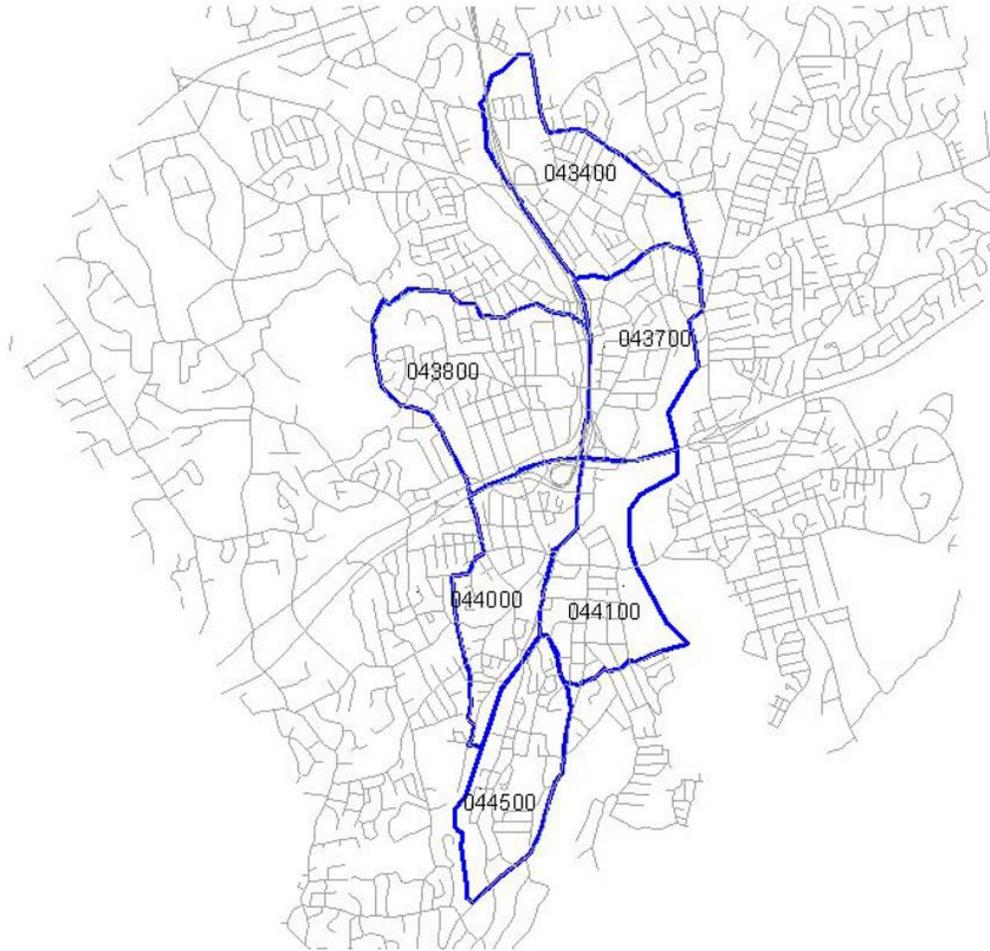
2. The Appendices include a list of criteria staff utilizes when reviewing applications for CDBG funds. Included in the criteria is a scoring system which favors applications for funds to be invested in low- and moderate-income census tracts. Additionally, as can be seen from the discussion above, the community's stated priority needs, herewith integrated into this Plan, articulate several place-based initiatives which necessarily target low- and moderate-income (LMI) tracts and neighborhoods. Consistency with the Plan is another source of points in Norwalk's application scoring system.

3. [The following answer is referred to in all sections of this Plan regarding "obstacles to meeting underserved needs."] The most obvious and powerful obstacle to meeting underserved needs in the community remains affordable housing. Discussed in other sections of this Plan, affordable housing emerged in the citizen consultation/participation process as a deeply embedded thorn in the side of virtually every other need that arose, from moderate-income working families, to persons recovering from substance abuse, to economic and business development, to issues surrounding prisoner re-entry, to the frail elderly, to the home-life of poor children struggling to close the achievement gap in environments not conducive to school preparedness.

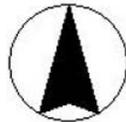


Maps 1 & 2: Local and Regional LMI Concentrations
Source: US Census [<http://www.census.gov>]

LMI Tracts

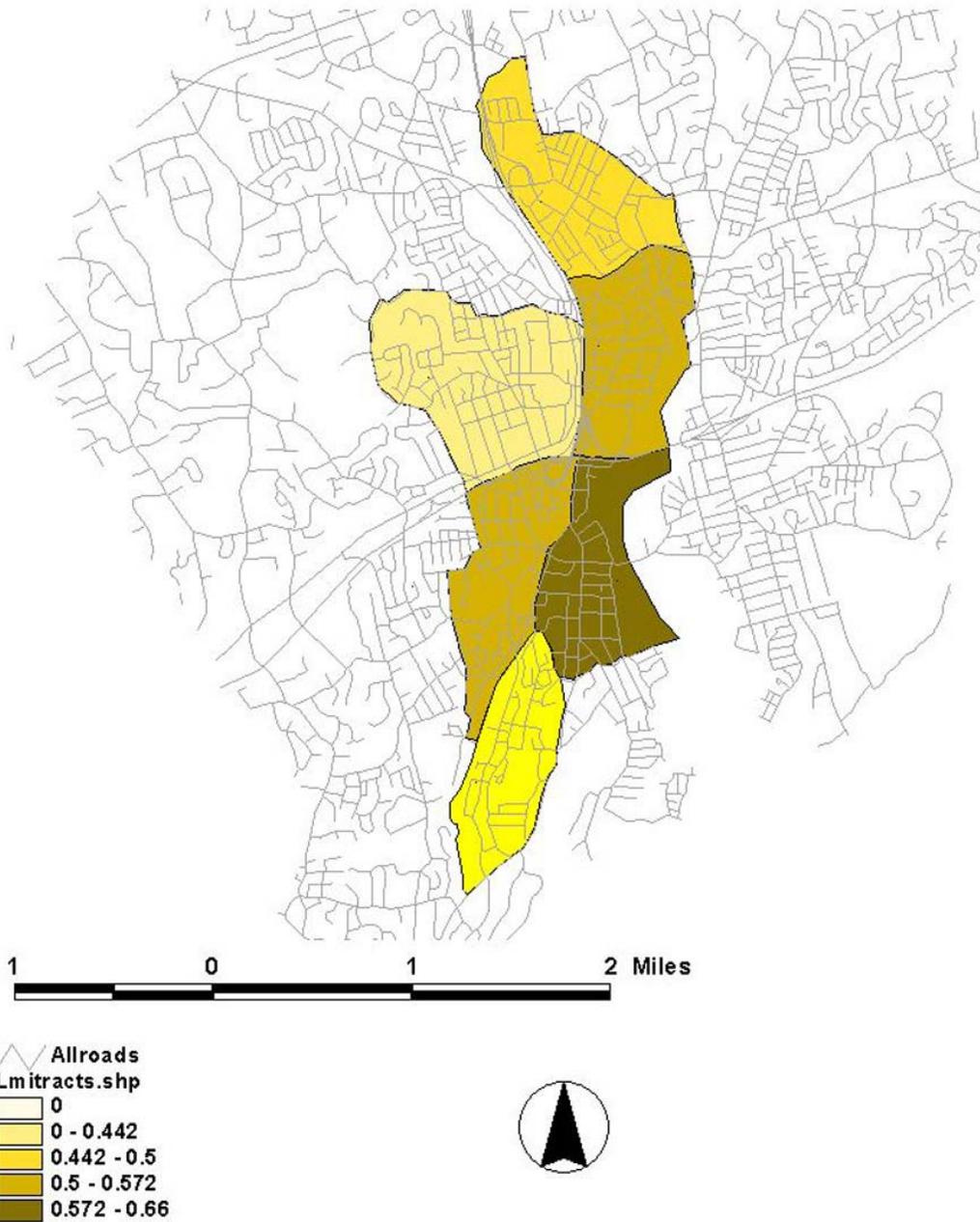


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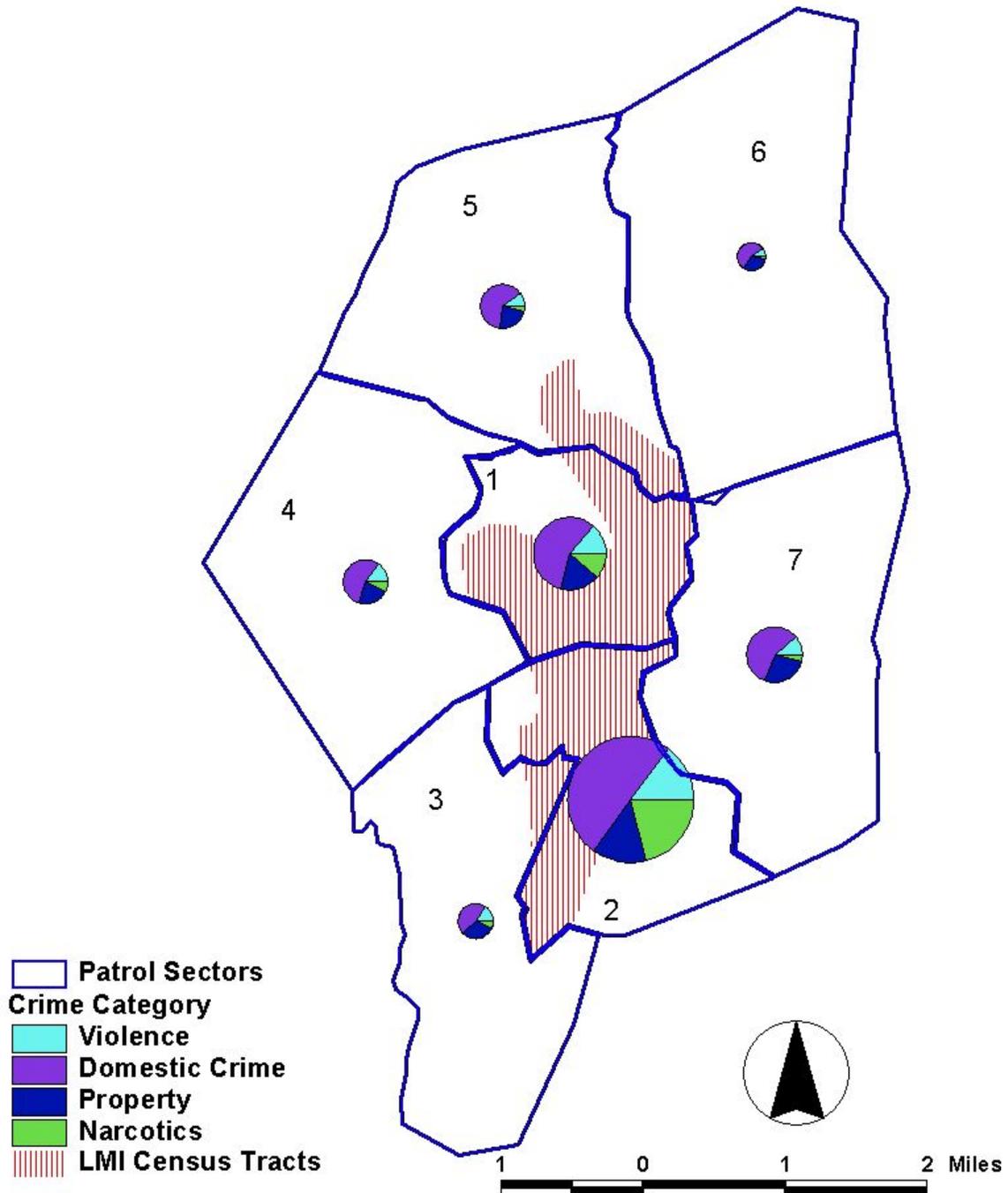
Map 3: Norwalk's Low- and Moderate-Income Census Tracts

Minority Concentration



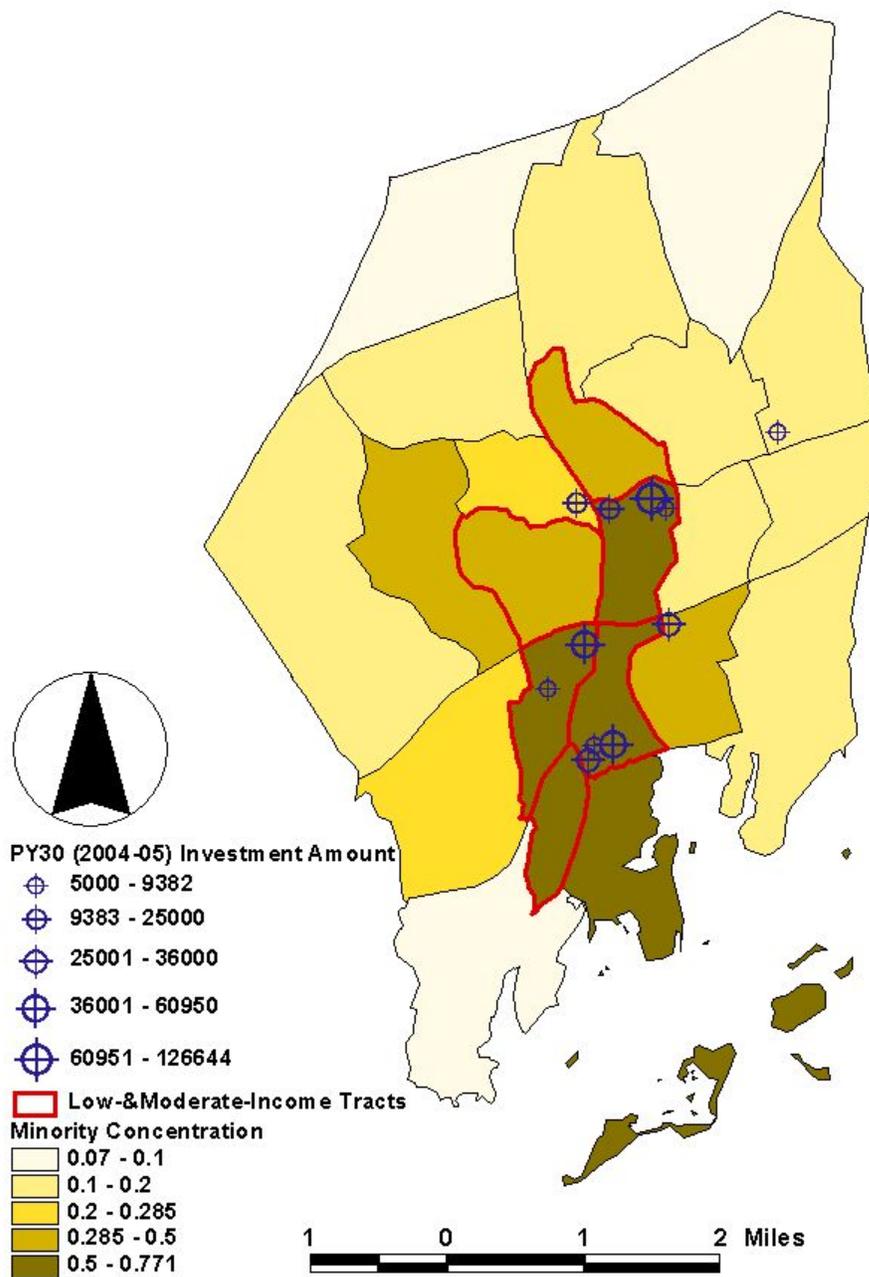
Map 4: Norwalk's Census Tracts with High Minority Concentration

Incidence of Crime



Map 5: Concentrations of Crime
Source: Norwalk Police Department, 2004 Patrol Data

CDBG Investment\$



Map 6: PY30 CDBG Investments Relative to LMI Areas and Minority Concentration

Managing the Process (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

3-5 Year Strategic Plan Managing the Process response:

1. The lead agency developing the Plan is the Norwalk Redevelopment Agency, whose mission is *to improve the physical, economic and social environment of the Norwalk community by serving as the primary governmental organization dedicated to promoting commercial development, to preserving and improving the City's housing stock and to securing and administering the resources required to carry out these goals*. In addition to administering the CDBG program on behalf of the City of Norwalk, the Agency is also a subrecipient, applying each year for funds to administer the CDBG-seeded Residential Rehabilitation Revolving Loan fund.

2. During the drafting of the *2005-2009 Consolidated Plan for Housing and Community (Plan)* Norwalk Redevelopment Agency (Agency) staff coordinated outreach meetings with representatives of public agencies, social service organizations and stakeholders. The meetings were conducted with public agency and non-profit professionals representing a range of community need categories including but not limited to, affordable housing, health care, workforce development, public safety and child wellness. During these meetings staff attempted to determine the needs of the low/moderate income community while identifying other sources on which to draw information. Agency staff conducted approximately forty-five (45) outreach meetings between Fall 2004 and Winter 2005. The topics raised in these meetings are included in a written summary in the Appendices.

When preparing those sections of the *Plan* associated with lead-based paint hazards, staff consulted closely with the Chief Environmental Officer of the Norwalk Health Department. The Norwalk Health Department was able to provide statistics from the past five years related to the number of children screened for the presence of lead and the number of children identified with Elevated Blood Lead Levels. Health Department staff also provided an overview of efforts to incorporate lead screening into the City's housing programs.

During the preparation of the of the description of the municipality's priority non-housing community development needs the City and Agency will make arrangements to circulate the draft *Plan* to the government offices of surrounding communities

including Wilton, New Canaan, Westport and Darien as well as the Southwestern Connecticut Regional Planning Association, the regional planning body.

Agency staff consulted with the Norwalk Housing Authority in order to analyze public housing needs and plan Comprehensive Grant activities.

Citizen Participation (91.200 (b))

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

3-5 Year Strategic Plan Citizen Participation response:

Introduction

The City of Norwalk (City) and Norwalk Redevelopment Agency (Agency) considers the involvement and input of the City's low/moderate income residents to be essential to the creation and implementation of its *2005-2009 Consolidated Plan for Housing and Community Development (Plan)*. In order to ensure the involvement from those who will derive the greatest benefit from the *Plan*, the Agency has created a formal *Citizen Participation Plan*. Drafted in accordance with 24 CFR 91.105, this *Citizen Participation Plan* outlines the strategy and formal processes for securing comment regarding the goals, objectives and content of the *Plan*. This strategy will detail:

- The process for submitting public comment;
- The steps used to publicly notice the draft document;
- The duration of public comment periods;
- The locations for accessing copies of the draft *Plan*;
- The dates and times of public hearings and
- The criteria for amending the *Plan*.

CITIZEN PARTICIPATION PLAN

The Agency has moved proactively to encourage participation of all its citizens including minorities and non-English speaking persons, as well as persons with disabilities. Information and records related to the *Plan* and use of assistance received under the United States Department of Housing and Community Development's (HUD) Community Development Block Grant Program (CDBG) are available at the Agency offices. Agency staff made information regarding the drafting of the *Plan* available to Norwalk Housing Authority officials, including the Executive Director, Deputy Director and Development and Personnel Analyst, in order to assist with the creation of the Housing Authority's five-year Comprehensive Grant.

Requirements of the Consolidated Plan for Housing and Community Development (Plan) and Annual Action Plans (AAPs)

Prior to the City's approval of the *Plan*, the City will make available to residents, governmental agencies, social service organizations and other interested stakeholders information that includes (1) the amount of financial assistance the City expects to receive from the CDBG Program, (2) the range of activities that may be undertaken and (3) the estimated amount that will benefit persons of low/moderate income. The City will make this information available as part of the annual Notice of Funding Availability (NOFA) process associated with the dissemination of program funds to sub-grantees. The NOFA will contain the value of the City's annual allocation of HUD funding and budget for these funds.

Minimization of Displacement

Projects and activities funded using CDBG Program monies will be planned in order to minimize the displacement of low/moderate income residents. In the event displacement occurs, the City will notify affected persons and provide assistance consistent with the provisions of the Federal Uniform Relocation Act and all other applicable governmental regulations.

Publication of the Plan

The City will publish and make public all versions of the *Plan*. The publication of these documents will afford the opportunity to provide comment regarding content.

The City will place copies of the draft and final versions of these documents at the following locations:

- The Norwalk Public Library,
- The South Norwalk Branch Library,
- The Norwalk Redevelopment Agency,
- The administrative offices of the Norwalk Housing Authority and
- Norwalk Economic Opportunity Now, Inc. (NEON) and
- The Human Services Council (HSC).

In addition the City will make these documents available to other area funders, and on the City's website: www.norwalkct.org. The City will also make free copies of the *Plan* available to those groups or individuals that request the document.

A summary of the proposed *Plan* including a listing of sites where the document is available will be published in a periodical of general circulation (presently, the *Norwalk Hour*). This summary will contain a description of the contents and purpose of the *Plan*. The City and Agency will place a final copy of the document, as adopted or amended by the Common Council and in the format to be submitted to HUD, at the previously mentioned sites.

Public Hearings

The City and Agency will conduct at least two public hearings during the drafting and development of the *Plan*. At a minimum, published Notices of Public Hearing will appear in the legal notices sections of the *Norwalk Hour* twice prior to each hearing. The City and Agency will publish the first such notice no earlier than fourteen (14) days prior to any public hearing.

The Agency will also schedule a thirty day period in order to accept comments regarding the near complete version of the draft document. The City and Agency will

consider any comments or views of citizens received in writing, in preparing the final *Plan*. The City and Agency will produce a summary of the comments and a summary of any comments not accepted and the reasons for their exclusion and attach this summary to the final *Plan*.

Access to Records

The City will provide residents, social service organizations and stakeholders with reasonable and timely access to information and records relating to the City's use of assistance under the programs covered by this part during the preceding years.

Technical Assistance

The City and Agency will provide for technical assistance to groups representative of persons of low/moderate income that request such assistance in developing proposals for funding assistance under any of the programs covered by the *Plan*, with the level and type of assistance determined by the City and Agency.

Complaints

The City and Agency will provide timely, substantive written response to every written citizen complaint, within fifteen (15) days.

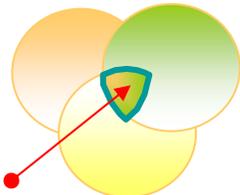
Development of Annual Plans and Release of Notices of Funding Availability (NOFAs)

At least annually, the Agency will announce the availability of funding under the Community Development Block Grant program, following the procedures outlined in this section for notices, public hearings, and information sharing. The NOFAs will include an application form for receiving a sub-grant of CDBG funds. Eligible applications will be those that clearly comport with and advance the goals of this Plan. Applicants are asked to submit proposals addressing needs and themes, discussed in this Plan and its Tables.

It is the consensus of both staff and the community at large that, with the modest \$1 million average entitlement typically received by Norwalk, and the overwhelming need for those funds in the community, a strategy more critical than ever for Norwalk to follow is that of 'leveraging.' In an era of growing need and shrinking resources, it is critical that every available resource be leveraged to collaboratively address the needs of the community. In that spirit, a critical component of the Plan is a three-pronged leveraging strategy for all funding proposals, and will not fund ongoing maintenance of any organization. First, applicants will self-evaluate how their proposal leverages the participation and resources of other organizations in Norwalk to form partnerships and avoid duplication. Second, applicants will assess how their proposal leverages funds from a diversity of funding sources, also to form partnerships and avoid duplication.

Third, applicants will discuss how their initiative is leveraged to address a

plurality of community needs. Applicants should refer to Figure 4, below, and seek to develop initiatives that respond to a number of needs and/or aim at the center of the diagram where the community goals of reversing the achievement gap, de-concentrating poverty, and economically re-engaging vulnerable populations all overlap.



Substantial Amendments

According to 24 CFR 91.105(c) the Citizen Participation Plan must identify a process for obtaining public comment when a substantial amendment is proposed for the *Plan*.

Substantial amendments include what is frequently referred to as 'reprogramming' and are defined in 24 CFR Section 91.505 as:

- Any new use of funds,
- The elimination of a previously approved activity prior to the start of the new contract period,
- Any change in the method of distribution of funds,
- Any modification not previously identified in the *Plan* that results in a 25% increase or decrease in level of funding or
- A change in the purpose, location or beneficiaries of a previously approved activity.

In order to comply with requirements for public comment, any substantial amendment to the *Plan* will require a public hearing and a public comment period of at least 30 days. The City and Agency will publish the notice of the public hearing and public comment period in the legal notices sections of the Norwalk Hour twice prior to the hearing. The City and Agency will publish the first such notice no earlier than fourteen (14) days prior to any public hearing. The public comment period will begin the day following the hearing. Following the close of the public comment period the proposed amendment must receive approval from the Commissioners of the Redevelopment Agency and the Norwalk Common Council.

The City and Agency will consider any comments or views of citizens received in writing, or orally during at the public hearing, in preparing the substantial amendment to the *Plan*. The City and Agency will produce a summary of those comments or views, and a summary of any comments or views not accepted and the reasons for their exclusion and attach said summary to the substantial amendment.

Performance Reports –

Consolidated Annual Performance Evaluation Report (CAPER)

The City and Agency will provide citizens with the opportunity to comment on the annual CAPER that measures the annual expenditure of CDBG funds and the progress of activities and projects funded with CDBG monies. The City will provide a period of fifteen days during which residents, social service organizations and stakeholders may comment on the performance report that the City and Agency will submit to HUD. The City and Agency will publish a notice for the public comment period in the legal notices sections of the Norwalk Hour twice prior to the start of the comment period. The City and Agency will publish the first such notice no earlier than fourteen (14) days prior to the start of the comment period.

Public Hearings Related to Annual Administration of Program

The City and Agency will provide for two public hearings each year to entertain comments and questions from residents, social service organizations and stakeholders. The hearings will address housing and community development needs and review of program performance. During the first program year of a *Plan*, the City and Agency will conduct at least one of these hearings before the proposed *Plan* is published for public comment.

The City and Agency will hold these hearings in Norwalk City Hall, a public building fully accessible to individuals with physical disabilities. Notices for each public hearing will appear in the legal notices sections of a periodical of general circulation, the Norwalk Hour twice prior to each hearing. The City and Agency will publish the first such notice no earlier than fourteen (14) days prior to any public hearing.

Citizen Participation in the Creation of the Plan

The City's *Plan* will illustrate a strategy for the allocation of a limited public financial resource, CDBG funds, in order to address the socioeconomic challenges facing Norwalk's low/moderate residents. Recognizing that citizen participation and public comment are integral to (1) the identification of these challenges and (2) the development of viable strategies to address those challenges with CDBG and other resources, the Agency formulated a multi-pronged process to procure this input. This process captured information from a broad spectrum of citizens, social service providers and stakeholders that became the basis of the *Plan*.

The Survey and Outreach Process

The specific sources of information, or input, were derived from five (5) categories. The information from these inputs played a critical role in identifying emerging themes and priority needs described in the *Plan*.

1. Outreach Meetings

The first such source included Agency-led outreach meetings with residents, social service organizations and stakeholders. The meetings were conducted with professionals representing a range of community need categories including but not limited to, affordable housing, health care, workforce development, public safety and child wellness. During these meetings staff attempted to determine the needs of the low/moderate income community while identifying other sources on which to draw information. Agency staff conducted approximately thirty-five (35) outreach meetings between Fall 2004 and Winter 2005. The topics raised in these meetings are included in a written summary that accompanies the *Plan*.

2. Surveys

Agency staff circulated approximately five hundred (500) community needs surveys to low/moderate income residents of Norwalk. These surveys asked respondents to rank several needs categories, including jobs, places, services and health, in order of importance. To serve Norwalk's non-English speaking residents these surveys were translated into Spanish and French Creole for Norwalk's Haitian community. Agency staff circulated these surveys to the homeless through the *Advocates Group to End Homelessness*, residents of three of Norwalk's public housing developments and to Norwalk church congregations through the Norwalk Clergy Association. Staff received seventy (70) responses to these surveys.

3. Reports and Empirical Studies

Agency staff also conducted research using a broad spectrum of reports and studies that explore the needs of the low/moderate income individuals within the greater Norwalk area. These reports included community needs surveys conducted by local non-profit, social service agencies, and academic materials. As part of this phase Agency staff reviewed a total of eight (8) reports and empirical studies listed in the Appendix, as well as HUD's CHAS Data Book.

4. Infoline

Infoline, a service of the regional office of the United Way, is an informational hotline that area residents may contact in order to identify available social services. Agency staff also reviewed the questions and issues raised during three years, totaling over fourteen thousand (14,254) calls. Agency staff identified the top ten categories of calls.

5. *Steering Committee and Joint Committee*

While employing a variety of tools to collect comment directly from residents and those organizations serving the City's low/moderate community, the City and Agency also created two ad-hoc committees comprised of members of the Planning Committee of the Norwalk Common Council and the Agency's Commissioners in order to integrate the experience, judgment, and discretion of locally elected and appointed officials into the development of the *Plan* and the allocation of the City's CDBG funding.

The first such committee, the *Plan Steering Committee*, was charged with reviewing information collected by staff and creating the final goals and objectives that serve as the basis for the *Plan*. The members of the *Steering Committee* met with Agency staff members in order to review the information collected by staff periodically. As the result of these meetings Agency staff and the *Steering Committee* members were able to synthesize the information collected from the community and then establish the needed goals and policy priorities for the *Plan*.

As part of the work of the Steering Committee the Agency held a public hearing during which staff provided an overview of the *Plan* and afforded the public an opportunity to offer comment. This hearing was held at Norwalk City Hall on February 22, 2005. The minutes of the hearing are included in the Appendices.

The second, the *Joint Committee*, is an annual ad-hoc committee, responsible for making recommendations concerning the distribution of the City's annual allocation of CDBG funding to sub-grantees. This process is initiated by the circulation of a Notice of Funding Availability that outlines the amount of funding available each year, identifies annual funding priorities and the steps associated with applying to the Agency for funding. Requests are rated and ranked by City and Agency staff using several criteria such as the applicant's (1) adherence to the goals and objectives outlined in the *Plan*, (2) ability to use CDBG funds to leverage other resources and (3) past performance using CDBG funds. These criteria are included in the appendix.

Institutional Structure (91.215 (i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.
2. Assess the strengths and gaps in the delivery system.
3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

3-5 Year Strategic Plan Institutional Structure response:
Summary of Institutional Structure
(24 CFR 91.100)

The Norwalk Redevelopment Agency (Agency) has been designated by the City of Norwalk to administer the municipality's annual allocation of Community Development

Block Grant (CDBG) funds. In addition the Agency is charged with creating this Plan, the strategic planning tool that identifies the needs of Norwalk's low/moderate income residents and establishes goals and objectives for the disbursement of CDBG funds to address those needs. The successful implementation of the *Plan* requires close coordination between the community's extensive non-profit service providers, private industry and public institutions.

The Agency serves at the core of the institutional structure, or continuum of organizations, that is charged with this implementation process. The first step in this process is the Agency's development and dissemination of a Notice of Funding Availability (NOFA). The NOFA provides an opportunity for local and regional organizations to apply for CDBG funding to carry out the goals and objectives of the Plan. The NOFA describes the amount of funding available and measures for ranking applications. Applications are assessed according to several criteria including the applicants' adherence to the themes and needs cited in the *Plan*, the ability to use CDBG funding to leverage other resources and the applicant's skill in managing past grant awards from the CDBG Program. Once grants are awarded to sub-grantees, the Agency is charged with monitoring each award to ensure funds are spent in accordance with CDBG programmatic guidelines.

Once funds are awarded, the successful implementation of the *Plan* is dependent on the sub-grantees ability to implement those programs funded with CDBG monies. The City of Norwalk is home to a broad array of governmental institutions and non-profit organizations that serve the social needs of Norwalk's low/moderate income residents and often partner with the CDBG program. These organizations are identified in the Norwalk Resource Directory, incorporated by reference in the Appendices.

The community is also home to a number of potential partnerships in private industry (such as for-profit developers), and faith-based organizations, such as the Norwalk Clergy Association.

The strengths of this institutional structure are its size, and scope. Another strength is the degree to which the structure has been mapped out in the form of the attached "Norwalk Resource Directory." A weakness may be the part of the structure dealing with the issues of teenagers (a teen center was a popular request during the citizen participation process) in a comprehensive fashion. Norwalk has suffered a number of incidents of youth/gang violence recently,¹² and, while a number of youth-focused initiatives exist within the community, the addition to its institutional structure of a coordinating body around the issue of teenage health, safety, and well-being in Norwalk might be welcome. Recently, a group modeled after Boston's "Ten Point Coalition" has been meeting to coordinate the efforts of area clergy, police, and social service organizations, toward the prevention of gang violence. Additionally, while the area has a number of non-profit housing developers (The Housing Development Fund, Mutual Housing Authority, Action Housing, Northwalke Housing Corp.), there is a sense that none have, in recent years, produced significant additional affordable housing units in Norwalk. This area of the institutional structure may also benefit from improvement.

The Norwalk Housing Authority has prepared a five-year comprehensive plan for public housing needs as required by the United States Department of Housing and Urban Development under the Quality Housing and Work Responsibility Act. The Housing Authority's plan was adopted in 2005 and an executive summary is incorporated in the Appendices of this Plan.

Monitoring (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic Plan Monitoring response:

1. Norwalk implements mid-year and end-year monitoring with each of its subrecipients. Beginning last year, it also meets with organizations applying for funds to maximize proposal's compatibility with program regulations from inception. Norwalk also conducts "Pre-award Conferences" with successful applicants so that, prior to the signing of subrecipient agreements, each organization is clear on its responsibilities vis a vis the CDBG program.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

1. The Consolidated Plan Steering Committee, made up of staff and one representative each of the Norwalk Redevelopment Agency and the Planning Committee of the Common Council oversaw the development of this Plan. Once the goals and needs were articulated via community input, staff drafted strategies that the other Steering Committee members prioritized based upon their understanding of community needs in their capacities as community representatives. These priorities were then translated to HUD's CPMP tables and integrated into this Plan's narrative sections.

Since October of last year, Norwalk Redevelopment Agency staff have undertaken a 3-part strategy to assemble the informational foundation of the new Plan, including the communities identified needs. This strategy, the results, and the process are depicted in Figure 3.

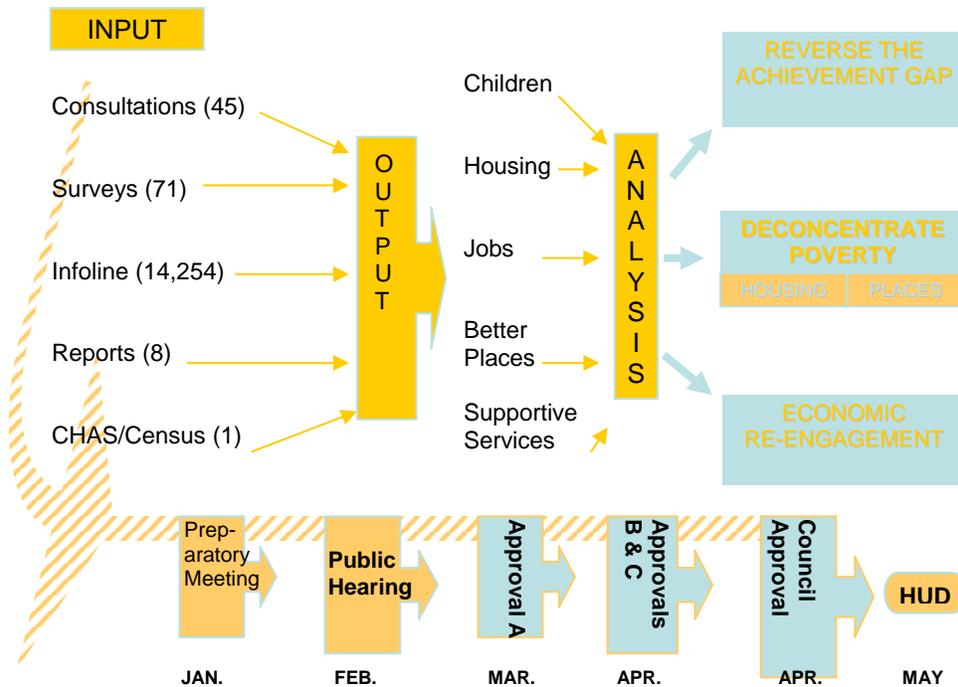


Figure 3: Con Plan process to date, and anticipated

First and foremost, staff have attempted to meet directly with the community, visiting organizations, community leaders, and residents of subsidized housing throughout the city. Staff have asked three simple questions: one, where are the needs of the low and moderate-income community greatest; two, whom else should be asked; and three, what sources of information on this question should staff consult. Staff takes this opportunity to gratefully acknowledge all those who have participated in this process, and invite those same persons and organizations to remain involved as stewards of the completed Plan.

Second, staff have consulted a range of other plans and reports exploring the needs of low and moderate income individuals in the greater Norwalk area. These have been listed in the Appendix.

Third, staff have reviewed a range of survey and statistical data documenting the community conditions affecting the low- and moderate-income population, mostly derived from the US Census.

Findings

As related above, staff have been fortunate to receive a wide array of input from across the community, and from various sources. This input addresses the basic question of ‘where/what are the needs of the low- and moderate-income community?’ That input is summarized in the small type of the diagram below.

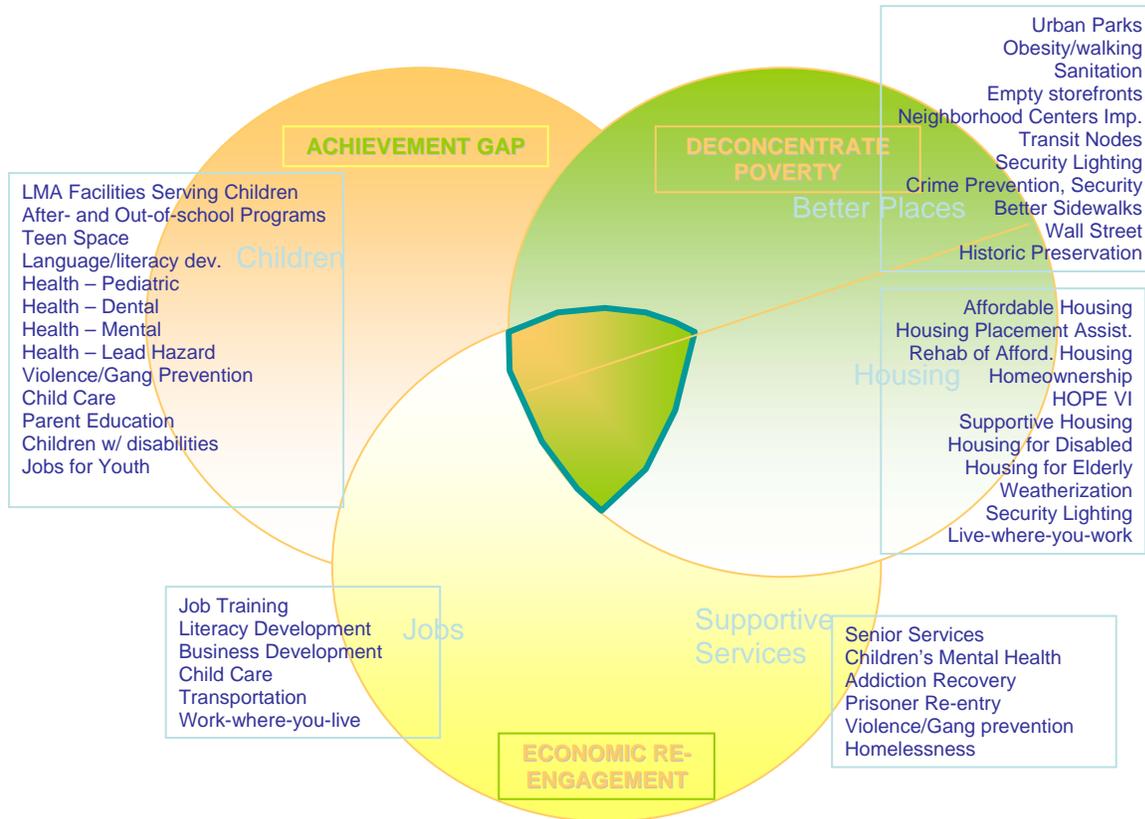


Figure 4: Feedback, Identified Needs and Main Themes

As the list of needs grew, certain groupings suggested themselves (e.g., ‘children,’ ‘jobs,’ etc.). Those groupings have been shown as the boxes of type. And as the needs and groupings were analyzed, three macro high-priority needs – “themes” – emerged: reversing the achievement gap, de-concentrating poverty, and economic re-engagement of vulnerable subpopulations. Each program year will be ascribed one of these themes as a priority, or “Community Impact Area,” and applicants will be encouraged to develop proposals addressing the Plans objectives under that theme.

2. See General Questions, #3.

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs.

3-5 Year Strategic Plan Lead-based Paint response:

Methods currently employed for ascertaining active lead hazards are mainly reactive, and not currently yielding data to implicate lead-based paint as a significant public health issue. However, 82% of Norwalk's housing stock was built prior to 1979 and is assumed to present lead-based paint hazards. As many as 8,678 residential units are presumed to be impacted by active or encapsulated lead-based paint hazards. As is typical, Norwalk's densest and oldest housing is concentrated in its downtown, low- and moderate-income census tracts. Therefore, of the aforementioned 8,678 units, most are thought to be occupied by low/moderate income households. Lead-based paint appears to present a significant hazard to children living in Norwalk's low/moderate income census tracts and the ongoing identification and hazard control of lead paint is a strategy under the goal of reversing the achievement gap.

During the calendar year 2004, the Department of Health tested 126 children under the age of six (6) for elevated levels of lead in the bloodstream. Seventy-four (74) of those children had elevated levels of lead in their bloodstream: sixty-four (64) registered lead counts of 10-19 micrograms per deciliter and ten (10) registered lead counts of twenty (20) micrograms per deciliter or greater.

In addition to monitoring the health of children with elevated levels of lead in their blood, the Health Department conducts testing for lead-based paint in those environments where those children spend significant amounts of time to determine the source of exposure. Once the source of exposure is located, efforts to abate the issue are undertaken.

Children with EBLL are referred to the Health Department from multiple sources including referrals from local pediatricians and blood lead testing conducted at the Health Department's community clinic. Lead based hazard reduction practices have also been incorporated into local housing programs. The Health Department adheres closely to State of Connecticut regulatory guidelines in order to remediate the conditions that generate incidents of EBLL in children. For those children with blood lead levels between 10-19 micrograms per deciliter, the Health Department provides a package of educational materials to the household which describes methods for reducing the risk of lead-paint hazards.

When blood lead levels exceed twenty (20) microgram per deciliter the Health Department pursues a comprehensive list of activities to remediate lead-based hazards from the household. These activities include:

- Epidemiological investigations,
- A comprehensive lead inspection,
- The creation and implementation of an abatement plan and
- Clearance dust wipes and post abatement inspections.

The Redevelopment Agency also maintains a *Residential Rehabilitation Program* that offers below-market rate loans to low/moderate income homeowners for completion of critical renovations to the household. Homeowners may use these funds to complete renovations that result in lead-safe environments.

Additionally, the Health Department and Redevelopment Agency are participants in a State-wide consortium, Lead Action for Medicaid Primary Prevention (LAMPP), which funds lead-safe rehabilitation for qualifying households and conducts lead-safe work practice training for contractors in the housing construction and renovation trades.

HOUSING

Housing Needs (91.205)

*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).
2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

3-5 Year Strategic Plan Housing Needs response:

1. Defining and responding to Norwalk's housing needs continues to be an issue of controversy, passion, and consternation. To many, the need could not be more apparent: Norwalk's average home sale passed the \$600,000 level last year.¹³ However, Norwalk's battle with expanding affordable housing is fraught with the usual hang-ups -- NIMBY-ism (Not In My Back Yard), and a menu of politically difficult choices (e.g., inclusionary zoning, allocation of financial resources in tight budgetary periods, etc.) -- and, consequently, progress on affordable housing has been modest in Norwalk.

Approaches to Defining and Discerning 'Need'

Local Consensus

Ultimately, for whom what kind of housing gets provided requires decisions -- whether made actively or passively -- about who the Norwalk community should include, who it should exclude, and what sort of regional adjustments the community is willing to accept in order to reach the desired composition.

The gap between Norwalk's collective vision for its socioeconomic makeup and the ability of the low- and moderate-income segment of that makeup to live here is what, logically, comprises Norwalk's actual 'housing need.' In that sense, Norwalk has no clearly defined or quantified housing need, but rather a varied set of indicators, market conditions, and federal and state policy objectives. Some of the additional descriptions of need are as follows.

Market Forces

First, it must be acknowledged that "Need" is difficult to define. To the extent that Norwalk's housing is controlled by market forces, the evidence of abundant buyers and sellers, renters and landlords would seem to indicate that the basic principles of supply

and demand are functioning, and that the "housing needs" of sufficient significance to make their presence known in the marketplace are being answered by those who develop, build, sell and lease housing. The median home sold in Norwalk last year, at \$491,000¹⁴ was exactly 'affordable' to last year's area median family income of \$111,600. And residential development activity has been strong in recent years. Last year's single family home sales rose by 3.2% to 848.¹⁵ That being said, housing analysts say that 5% and 1-2% are optimal vacancy rates for rental and ownership housing, respectively,¹⁶ which is well above Norwalk's 1% and 0%. However, those who define need strictly on the basis of market performance may point to an active -- and statistically well-matched -- year of home sales.

Waiting Lists

On the other hand, statistical medians don't always tell the whole story, and the desire for housing beyond that which is being produced in the marketplace can be seen in various waiting lists across Norwalk's housing spectrum. A senior congregate housing facility, The Marvin, has a waiting list in excess of twice its capacity,¹⁷ and the Norwalk Housing Authority (NHA) has a waiting list for Section 8 certificates -- even as decisions at the federal level during the writing of this Plan reduce this program's capacity -- approaching 1,000 families.¹⁸ NHA's waiting list for public housing is 951 households long.¹⁹

Cost Burden

HUD's Table 2A (attached) uses the concept of "cost burden" (when a household must spend more than 30% of its total gross income on housing costs) to get at a definition of 'need.' According to the census 32% of Norwalk's households spend over a third of their income on housing, and of that 32%, over 54% are spending more than 50% of their income. (If this seems inconsistent with the market indicators described above, it is because the "area" referred to in the datum "area median family income," incorporates Norwalk's more affluent neighbors of Darien, New Canaan, Westport, Weston, and Wilton, as well as Greenwich and Stamford. During the 2000 census, Norwalk's median family income was \$68,219, or only two-thirds of the area's \$102,400.²⁰) Table 2A analyzes this housing need in the categories of persons indicated by the question (renters, owners, very low- and low-income, the elderly, etc.), with the exception of persons with HIV/AIDS, whose housing needs are expected to remain at their current level.²¹ Among the senior population, there is a strong desire for more congregate housing, evidenced by a relatively short waiting list for senior public housing (currently at 22 for a stock of about 300 units²²), and much longer lists for congregate housing (1-2 years for The Marvin and Broad River Homes).²³

State Policy

Yet a third approach to understanding need exists in Norwalk, and is reflected in its focus on maintaining a stock of government assisted and deed-restricted housing at a rate that exceeds the state's affordable housing appeals statute threshold of 10%. When a community in Connecticut falls below this threshold, the burden of proof in a zoning appeal for any development which includes an affordable housing component falls upon the municipality. This percentage is now estimated to be between ten and eleven percent in Norwalk, and much higher than in its immediately surrounding towns.

TOWN	2000 CENSUS HOUSING UNITS	GOVERNMENTALLY ASSISTED UNITS	CHFA/FmHA MORTGAGES	DEED RESTRICTED	TOTAL ASSISTED	PERCENT
Towns which are exempt under Section 8-30g CGS						
Norwalk	33,753	2838	326	485	3,649	10.81%
Stamford	47,317	5227	244	104	5,575	11.78%
Towns which are not exempt under Section 8-30g CGS						
Darien	6,792	85	2	32	119	1.75%
New Canaan	7,141	143	1	31	175	2.45%
Westport	10,065	192	10	-	202	2.01%
Wilton	6,113	86	-	70	156	2.55%

Figure 5: Affordable Housing for Norwalk and its Neighbors
 Source: Connecticut Department of Economic and Community Development

A peculiar characteristic of this State benchmark is that the "total" number of housing units that are used to calculate the rising and falling percentages, is frozen at the 2000 Census level (i.e., 1999), effectively excluding any and all creation of market rate housing units coming on line since 1999. The mathematical effect is that any new affordable housing -- however meager in context -- increases this percentage until the 2010 Census, even if those increases are far outweighed (as they are in Norwalk's case) by increases in market rate units. Therefore, this Plan is using state department of public health housing construction estimates for 1993-2003, and has determined that Norwalk's total housing units increased on average at a rate of six tenths of one percent throughout that time period. This suggests that to maintain a percentage of state-designated affordable housing at or above the true 10% level would necessitate the production of about twenty-one units of assisted and deed-restricted units per year over the 5-year period of this Plan. To avoid costly litigation and potentially poor quality development imposed on it through CGS §8-30(g), Norwalk will likely endeavor to keep its stock above this 10% level.

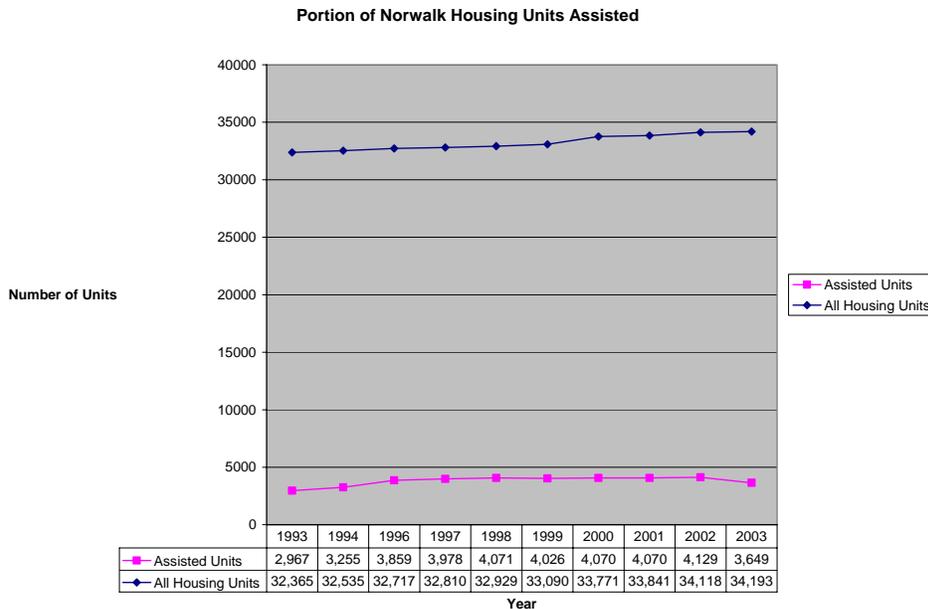


Figure 6: Norwalk's §8-30-eligible Affordable Housing (note: 2000-03 are Connecticut State Department of Public Health estimates)
 Source: Connecticut State Department of Economic and Community Development

Economic and Workforce Diversity

In the last census, the population in the 18-34 age range – the ages at which someone typically finishes high school, or college, and must decide where to locate, live and

work, and, later, to settle down. This population, in 1990, comprised 46% of the working-age population. And, this population decreased by 15%, or by over 3,700 persons, between 1990 and 2000.²⁴ The need (for reasons explained at the beginning of this Plan) to house a workforce in a city heavily dependent on its commercial tax base is another possible 'housing need,' since without such housing, increasing numbers of people under middle-age will continue to opt out of Norwalk, to the potential detriment of the economy and the commercial tax base.

Source: SWRPA	Norwalk					
	2000 #	2000%	1990 #	1990%	Change #	Change %
Under 5 years	5,689	6.9%	5,326	6.8%	363	6.8%
5 to 17	12,621	15.2%	10,431	13.3%	2,190	21.0%
18 to 34	20,480	24.7%	24,242	30.9%	-3,762	-15.5%
35 to 49	20,525	24.7%	16,774	21.4%	3,751	22.4%
50 to 64	13,035	15.7%	11,665	14.9%	1,370	11.7%
65 years and over	10,601	12.8%	9,893	12.6%	708	7.2%
Total (All Ages)	82,951	100.0%	78,331	100.0%	4,620	5.9%

Figure 7: Population Shifts by Age Cohort
 Source: US Census, as compiled by the Southwestern Regional Planning Agency

This issue was explored in a model study commissioned by Minneapolis and St. Paul Minnesota, known as the "Twin Cities Study" which was used both to define and advocate for the housing needs of those communities.²⁵ The study determined a 'typical' area worker's salary and the supply of housing stock available to affordably house that worker. With that existing deficit, the study mathematically blended an allowance for unfilled jobs, the lower-than-desirable housing vacancy rates, and employment growth projections to determine the housing need over the next five years. The study went on to articulate a case for the economic benefit of housing development, which it based on multipliers derived from the economic activity both of the housing's construction and occupancy, and of the earnings expenditures of those housed, and finally of the business income realized when firms are able to fill vacant positions.

Transportation

The population which fills the jobs offered with Norwalk business but cannot afford to live here becomes part of the regional transportation problem. A community where its citizens can both live *and* work acts as a partial antidote to this problem. However, the population which lives AND works in Norwalk is declining.²⁶ Whereas most of the people who worked in Norwalk used to live in Norwalk, today, only about 17,000 of Norwalk's jobs are held by residents, while another 27,000 are held by those who must commute in.²⁷

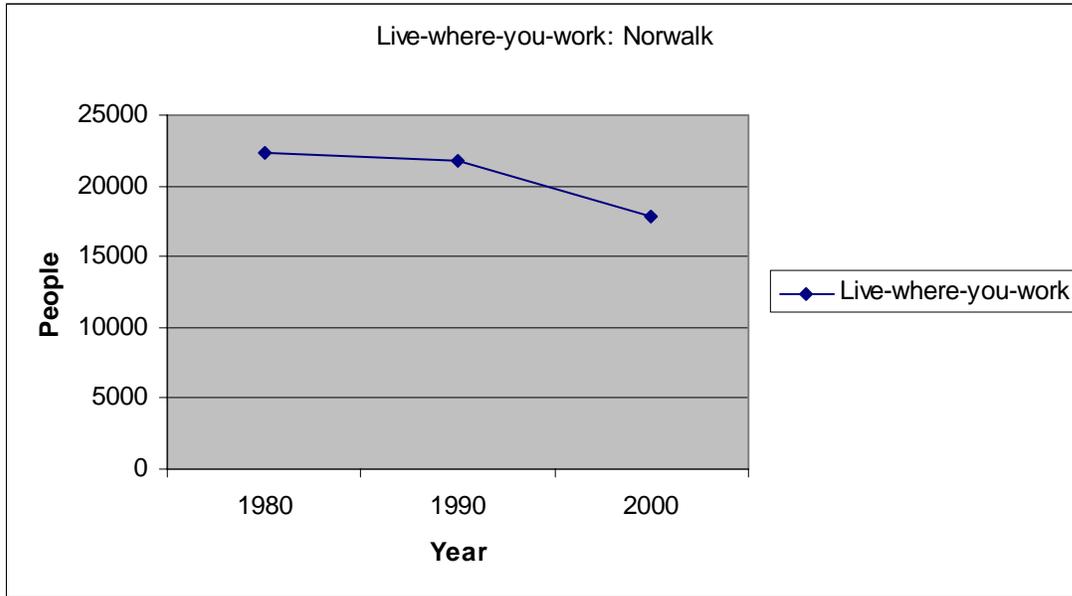
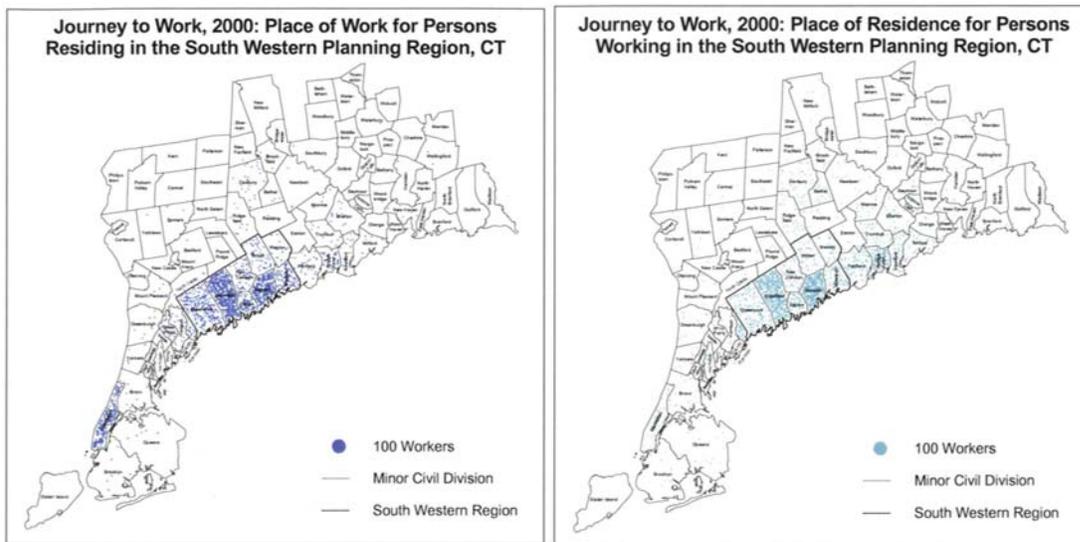


Figure 8: Live Where You Work Declines
 Source: US Census, Journey to Work data, compiled by Southwestern Regional Planning Agency



2. A review of 2000 United States Census data, specifically the Comprehensive Housing Affordability Strategy (CHAS) dataset, reveals whether the housing needs of a particular racial or ethnic group are disproportionately higher than the balance of the community. For this exercise, the housing needs of Norwalk’s (1) Hispanic, (2) non-Hispanic, Black and (3) Asian non-Hispanic communities were analyzed. This data revealed that 57.1% of Hispanic householders are faced with housing problems such as substandard housing or the lack of sufficient capital to afford housing. In addition, 46.1% of non-Hispanic Black householders are faced with housing problems. Concurrently, Asian non-Hispanic householders 33.0% experience similar housing problems. The statistical measures for Hispanic and non-Hispanic, Black households exceed the City average (35.2%) by greater than ten (10) percentage points.

These indicators of racial disproportionality reflect, in part, consequences of misguided social and urban planning policies of the past. Government efforts to construct high density, publicly-supported housing were one such policy. Federal and State – supported public housing, initially constructed in the World War II era, served to group economically disadvantaged populations into small geographic areas often within working-class neighborhoods. In Norwalk, 77% of family occupied, public housing units are located in the City’s most economically disadvantaged neighborhoods.²⁸

To exacerbate matters, these housing units were occupied primarily by members of ethnic and racial groups that historically faced discriminatory practices or had difficulty in achieving economic advancement. Often in these settings persons were deprived of necessary services such as adequate public education. Such circumstances served to reinforce poor socioeconomic conditions thus making it difficult for the residents of public housing to climb the economic ladder and access the resources necessary to afford safe and adequate housing.

Other causes of racial disproportionality in housing are attributable to the ever increasing ethnic population found in Norwalk and throughout the Nation’s urban centers. This diversity is fueled by an influx of immigrant labor. However cultural and linguistic barriers often pose a substantial challenge to those seeking to gain the necessary skills and job opportunities needed to achieve economic security and to purchase or rent safe, adequate housing.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. Describe the basis for assigning the priority given to each category of needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

1. The priority housing needs are identified in Table 2A (the "Housing Needs Table"), with data derived from the US Census and HUD's Comprehensive Housing Affordability Survey ("CHAS") data. Prioritizations were based on the analysis that the economic housing 'pinch' is greatest -- in both need and numbers -- on the population making 30-50% of area median income since other government programs (including for example Public and Section 8 housing, HUSKY health care for children, and Care4Kids childcare) target the lowest income population, leaving out working families with steady but modest incomes.

2. Although the needs are perpetual and ever-increasing, Norwalk is well-served by its existing stock of affordable housing, public housing, Section 8 certificates, and housing

for subpopulations requiring special needs. The recent boom in refinancing due to historic low interest rates spurred significant payoff activity in the Agency's Residential Rehabilitation Revolving Loan Fund, swelling the size of the fund and the amounts available for additional rehabilitation loans in the community. The housing market in Norwalk is also characterized by unusually high prices, being one of the highest priced markets in the nation. These several factors underpin the process of determining the relative priority of preserving existing affordable housing and the development of new units, as noted below.

3. Citizen input on the community's priority needs was emphatic on the need for more affordable housing. Other consultations, especially with the Consolidated Plan Steering Committee, noted that CDBG resources -- at roughly \$1 million/year -- would be stretched thin to create new units. Prohibitions on CDBG's use for new housing construction is an additional consideration on this topic. Consequently, the rehabilitation and preservation of existing affordable housing stock is viewed as the top priority through CDBG resources, while strategies of leveraging and funding partnerships will be the approach taken to pursue creating new units, an equally high priority in the community's mind, although less well-suited to the size and nature of the primary resource (CDBG) at the center of this Plan.

4. See General Questions #3.

Housing Market Analysis (91.210)

*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.
2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).
3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

3-5 Year Strategic Plan Housing Market Analysis responses:

1. According to the Comprehensive Housing Affordability Survey (CHAS), cited in this Plan's Housing Market Analysis Table, there are 33,178 housing units, consisting of approximately 7,000 efficiency and one bedroom units, 1,000 two bedroom units, and 16,500 units with three or more bedrooms. The CHAS shows a tight housing market, with 0% vacancy for sale units, and a 1% vacancy rate for rental units. HUD's published Fair Market Rents for the Stamford-Norwalk area are \$944 for efficiencies, \$1,149 for one bedrooms, and \$1,437 for two bedroom apartments. However, as noted earlier, Norwalk's inclusion in the Stamford-Norwalk statistical area obscures its much lower median family income. According to data from the William Raveis office in Norwalk, quoted in the *Norwalk Advocate* on 2/11/05, the average single family home

sale for 2004 was \$612,000, and the median was \$490,000. The least expensive single family home sold last year was a two-bedroom Cape Cod on .07 acres for \$150,000, the most expensive being a 8,000 SF 18-room waterfront home for \$6.2 million. The average condo sale was \$295,922, and the median was \$275,000.

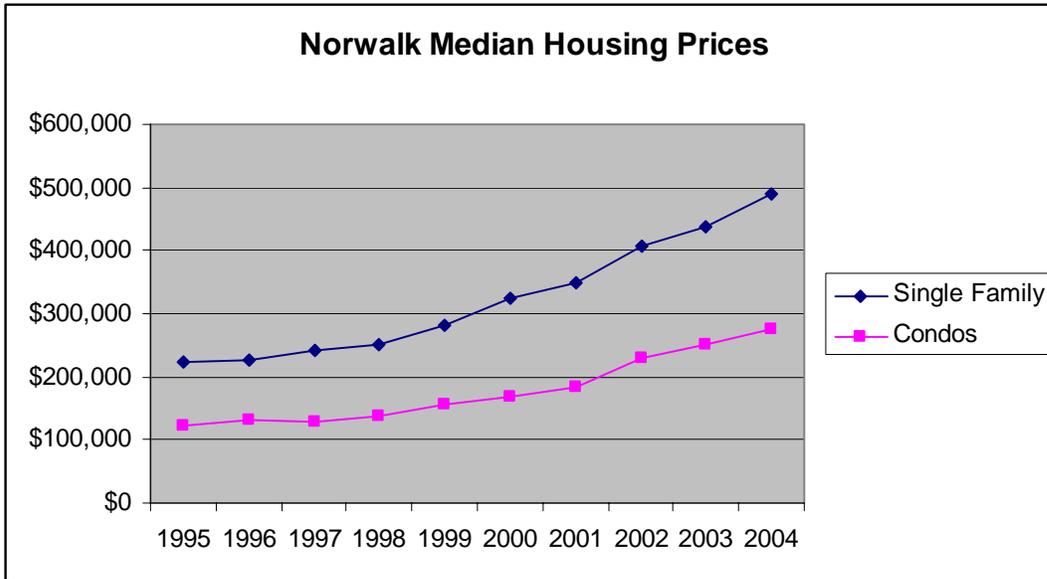


Figure 9: Norwalk's Median Housing and Condominium Prices in 2004
Source: William Raveis Real Estate

2. The most recent estimate of total housing units in Norwalk is from the Connecticut State Department of Public Health, for 34,193 units in 2003. (The number from the 2000 census used in the Plan's tables is: 33,173.) From the State Department of Economic and Community Development, who tracks data pertaining to the Affordable Housing Appeals Statute, we know that approximately 10% of those units are publicly assisted and/or deed restricted as affordable units, i.e., roughly 3,700. Of that, the local housing authority owns or manages over 1,000 units of public rental housing and 851 Section 8 certificates. Approximately 2,000 other units of housing are deed restricted, or otherwise reserved through government assistance for affordable housing. (This last category covers such developments as congregate senior housing like The Marvin and Broad River Homes as well as Action Housing developments and Keystone Homes.) A thorough inventory of assisted and deed restricted housing is included in the Appendices.

Norwalk counts 457 units of assisted housing for persons with a disability. When adding to this number the housing units that are for elderly and persons with disabilities, the number rises to 849. Using Norwalk's average household size of 2.5, these units may conceivably house roughly 16% of the 12,769 Norwalk individuals claiming a serious disability during the 2000 census, with the balance living in non-assisted housing. Keystone and Cedar Court are both examples of assisted housing for the disabled whose units are included in this number.

The Mid-Fairfield AIDS Project maintains 28 apartment units in the greater Norwalk area for low income persons living with HIV/AIDS and their families and there is always a waiting list about 4 persons long.²⁹ These apartments are subsidized through the Continuum of Care and an annual HOPWA grant. Although these units are set aside for persons with HIV/AIDS, they do not fully represent either the housing supply

or demand of persons living with HIV/AIDS, as most of this (and many other) subpopulation cross-diagnose with other afflictions, such as substance abuse, homelessness, mental illness, etc., and will sometimes avail themselves of the housing services available through organizations serving those other subpopulations.

According to the *Affordable Housing Task Force Study Report* (Greater Norwalk Chamber of Commerce / City of Norwalk; March 5, 2002), the earliest affordable housing stock anticipated to come off-line is approximately 90 units in 2010, beyond the expiration of this Plan.

3. The severe costs in Norwalk's housing market (by one account, it is the second most expensive in the nation³⁰), and other economic factors discussed earlier in this plan, suggest the ongoing importance of an aggressive stance on affordable housing, including the preservation of existing affordable stock -- through rehabilitation -- and the development of new affordable housing stock in concert with private for-profit and non-profit initiatives. The recent boom in refinancing due to historic low interest rates spurred significant payoff activity in the Agency's Residential Rehabilitation Revolving Loan Fund, swelling the size of the fund and the amounts available for additional rehabilitation loans in the community. These two market factors, along with labor, transportation, and fiscal factors discussed later, will influence the use of funds available to meet Norwalk's housing needs.

Specific Housing Objectives (91.215 (b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Strategic Plan Specific Housing Objectives response:

1. Norwalk's objectives are to respond to the needs articulated by the community, i.e., to preserve existing affordable housing, create additional affordable housing, provide housing placement assistance, and permanent supportive housing for the homeless, housing for the disabled and elderly, weatherization, security lighting, homeownership, HOPE VI support, and support for initiatives that expand live-where-you-work opportunities in Norwalk.
2. Locally, Norwalk will continue to work with a redevelopment model it has employed effectively, to negotiate 10% of a redeveloper's housing units to be set aside as affordable to families at 80% of the state's median family income, using its redevelopment powers, as well as its land resources to strengthen its negotiating position. It will continue to utilize its revolving loan fund, and its resources devoted to housing-related staff who protect and promote the city's housing stock. At the state level, legislation for an Affordable Housing Trust Fund is seems likely to be enacted, and a likely potential resource for addressing Norwalk's priority housing needs. At the federal level, Norwalk will continue to pursue Continuum of Care funding, ESG, HOME, and HOPWA, and such other federal programs that may be available to it. The community will also pursue state and federal tax credits where available.

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

As stated in its mission, the Norwalk Housing Authority (NHA) is committed to providing "safe, decent and affordable housing, and to assist the low-income housing participants to become self-sufficient". The NHA is charged with the maintenance of a total of 1,131 units of public housing located within sixteen (16) public housing complexes: 790 of these units are reserved for family housing and the balance of these units, equaling 341, are targeted for the elderly. According to the NHA's comprehensive 5-Year Plan for 2005-2009, 951 households were on the waiting list for public housing. The characteristics of the wait-listed households are summarized below:

Characteristic	Number of Households	% of total families
Wait list total	951	
Extremely low income (<=30%AMI)	936	98%
Very low income (>30% but < 50%AMI)	11	1%
Low Income (>50% but < 80%AMI)	2	<1%
Families with Children	592	62%
Elderly Households	37	4%
Families with Disabilities	38	4%
Race White	431	45%
Race Black	505	53%
Race Other	15	2%
Race Non-Hispanic	730	77%
Race Hispanic	221	23%

The waiting list for public housing units is currently closed and it is anticipated that annual turnover is seventy-six (76) units.

The following chart illustrates the need for units of households currently wait listed, demand as a percentage of total units demanded and the anticipated annual turnover by unit size:

Units Size	Demand in Units	% of Total Demand	Annual Turnover
1 Bedroom	303	32%	145
2 Bedroom	436	46%	79
3 Bedroom	189	20%	13
4 Bedroom	18	2%	10
5 Bedroom	3	<1%	1
5< Bedroom	0	0%	0

The Norwalk Housing Authority also administers project and tenant-based Section 8 certificates. A total of 950 certificates are currently in use and an additional 906 applicants are on the waiting list for Section 8 assistance. Like the waiting list for public housing, the waiting list for Section 8 assistance is currently closed.

Characteristics of those households awaiting Section 8 assistance are as follows:

	# of Families	% of total families	Annual Turnover
Wait list total	906		69
Extremely low income (<=30%AMI)	904	100%	
Very low income (>30% but < 50%AMI)	2	<1%	
Low Income (>50% but < 80%AMI)	0	0%	
Families with Children	606	67%	
Elderly Families	6	4%	
Families with Disabilities	43	5%	
Race White	320	35%	
Race Black	580	64%	

Race Other	6	1%
Race Non-Hispanic	697	77%
Race Hispanic	209	23%

Public Housing Strategy (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

3-5 Year Strategic Plan Public Housing Strategy response:

The Norwalk Housing Authority has outlined a multi-pronged strategy to increase services and improve the living environment for the extremely low-income, low-income and moderate-income families residing in the City of Norwalk's public housing units and complexes. This strategy is summarized in the NHA's comprehensive 5-Year Plan for 2005-2009, and executive summary of which is included in the Appendices. The main tenets of this strategy reflect the NHA's commitment to de-concentrate poverty, bridge the achievement gap facing those children residing in public housing complexes and empowering public housing residents to improve their economic condition.

In order to affect the de-concentration of poverty, the NHA, over the course of the newly adopted comprehensive plan, will seek to aggressively implement its Housing Choice Homeownership Program, which permits eligible participants the option of using a housing voucher to purchase a home. The NHA will also seek to access financing through innovative governmental programs, such as the HOPE VI, in order to undertake redevelopment projects that will transform the traditional public housing complex into a mixed-use setting to include a residents of varied incomes. The NHA will also pursue the development of special needs housing which can serve special populations such as the mentally ill and the frail elderly, utilizing a variety of financing and development approaches including project based HCV. The NHA is also considering revising its marketing and admission program in order to attract residents from a broad range of incomes.

In an effort to address the academic achievement gap the NHA intends to expand existing educational and social service programming. The NHA may achieve this by broadening the scope of the programs offered at its Learning Center Program to serve all ranges of residents including children attending Norwalk's public schools and adult learners.

The executive summary of the NHA comprehensive 5-Year Plan for 2005-2009 is included as an attachment to this document.

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

3-5 Year Strategic Plan Barriers to Affordable Housing response:

1. Norwalk's local policies, including zoning and other land use policies, leave ample room for improvement to encourage the development of new affordable housing. In addition, the rehabilitation, preservation and acquisition assistance for the current stock of affordable housing are strategies that are not pursued as aggressively as they should be.

2. Zoning

In Norwalk, multifamily housing is only permitted in areas of the city Zoned 'D' or lower, including the downtown area and along the two commercial corridors (coincidentally, the low-moderate income census tracts). Thus, should a private developer acquire land in any other portion of the city, it would not be permitted to construct affordable multifamily housing, nor even market rate multifamily housing that includes affordable units. Rather, the majority of the residentially-zoned land in the city is restricted to single family units which cannot, due to costs of land and construction, be constructed and sold or rented under any definition of "affordable," without an exorbitant subsidy. One positive aspect of the regulations is their allowance for the development of accessory ("in-law") apartments, even in the restrictive, single family detached zones.

Although discussed for years, the City has not yet enacted an affordable housing policy, inclusionary zoning ordinance, or regulation. Lacking same, private developers are asked to include affordable housing in their market rate developments, but are under no compulsion to do so. Thus, several have refused, including the developers of the AvalonBay project (yet to be developed). Another market rate (in this case, luxury) housing development currently being planned, for the former Pepperidge Farm site, also does not include affordable housing. The housing being developed in Reed Putnam, known as Maritime Yards, will include 10% of the units as affordable, with 90% market rate. Other development project areas may include affordable housing,

however, there is nothing compelling the private market developers, other than political persuasion. Ordinances already in place include Section 118-1050 *et seq.* of the Norwalk Code, which states that developers of multifamily housing units to be developed in permitted areas of the city (defined as complexes in excess of 12 units in the areas previously mentioned) may apply for a density bonus (up to a 20% increase in number of units) such that for every two (2) units that are added, one shall be “affordable” to moderate income people. There is also a provision where a developer could buy out the obligation to create affordable units by contributing to a fund. Since developers must “apply,” this is permissive rather than mandatory. Further, this ordinance, enacted in 1994, has not resulted in the creation of even one affordable unit.

Land Costs

Land costs are a significant stumbling block to the creation of affordable housing in Norwalk. However, the City must not fail to address this problem and take actions to ameliorate it. Many possibilities could be explored: tax incentives (credits or other tax devices) for developers of affordable housing so as to provide an incentive, rather than the current disincentive (economic loss) associated with developing affordable housing; tax reductions on affordable units once created, in recognition that they are not providing a market rate return to the developer/owner; partnering more closely with various non-profit entities, charitable foundations and public funding sources, to create pools of money to assist in land acquisition and other development costs;³¹ redirecting the large sums of monies paid back in the recent refinancing heyday, and budgeting additional monies, to most effectively leverage them for use in creating new affordable housing opportunities; funding the City’s development nonprofit, Northwalke, so that it could actually develop more units, in partnership with other entities; and more.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

*Please also refer to the Homeless Needs Table in the Needs.xls workbook

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

Table 1A (The Continuum of Care chart), reflecting the Greater Norwalk Area Continuum of Care's (CoC) Point-in-time Survey, shows that on any given day, Norwalk has roughly 225 homeless. Statistics for the Norwalk Emergency Shelter, Norwalk's largest local shelter provider, show that over the course of a year, well over a 1000 unduplicated individuals experience homelessness. Norwalk's homeless population tends to be male, minority, chronically homeless, and suffer from severe mental illness and chronic substance abuse. Often they have been legally evicted from their former residence. About 10% of Norwalk's homeless are employed -- some full-time, but more often part-time, or on a seasonal basis. Those claiming educational attainment at the high school graduate level or above comprise the majority of Norwalk's homeless population.

Table 1A also shows the gap and needs for facilities and services for homeless individuals and families (sheltered and un-sheltered). The gap, which includes emergency shelter, transitional housing, and permanent supportive housing, is 109 beds for individuals, and 117 beds for families. Services needed are outlined in Norwalk's CoC, and include Prevention, outreach & assessment, shelter services, and housing placement assistance and support through transitional housing to either permanent supportive housing, or independent living.

In the Agency's 24CFR91.100 consultations, it learned that that Norwalk's population at-risk of becoming homeless (excluding those who are chronically homeless and make periodic -- but not new -- fresh entries onto the shelter log) often use the services of local soup kitchens and food pantries. In a community where affording a "fair market rent" two-bedroom apartment requires an hourly wage of over \$27/hr,³² it is not uncommon for unaffordability alone to sometimes drive a family to homelessness, due to foreclosure or eviction from failure to pay rent.

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.

2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

1. Norwalk is attaching 'Exhibit 1' of its most recent Continuum of Care application which articulates its homeless and homeless prevention strategies, based on data collected during its point-in-time survey, consultation with homeless assistance providers, homeless persons, and other concerned citizens, and applicable to its

chronic and non-chronic homeless populations. Broadly, these strategies include the ongoing development and maintenance of a funnel-shaped continuum, beginning with outreach and assessment efforts, aimed at identifying homeless in the community and assessing their needs; connecting them to their most urgent shelter and service needs; assisting them to transition from emergency shelters to transitional, permanent supportive, or independent housing; and aggressively pursuing methods and strategies to prevent homelessness – both for the chronic homeless, and for those at risk of experiencing it for the first time.

2. With such a large number (102) of Norwalk’s homeless falling within the “Chronically Homeless” category, and a national policy to ‘end’ homelessness, the high priority will be on developing permanent supportive housing; the medium priority will be on sustaining emergency shelters as the option of last resort, and the low priority will be on the middle area of the continuum, transitional housing.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

Continuum of Care Housing Activity Chart and Service Activity Charts are attached.

Homeless Strategic Plan (91.215 (c))

1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

2. Chronic homelessness—Describe the jurisdiction’s strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Plan, CoC, and any other strategy or plan to address chronic homelessness.

3. Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.
4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.
5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

3-5 Year Homeless Strategic Plan response:

1. As discussed above, Norwalk's CoC includes a funnel/continuum of shelter and services, including outreach and assessment, emergency shelter and services, transitional and permanent supportive and independent housing. The need continues to challenge the threshold of sufficient resources to meet it. However, the community continues to endeavor to leverage every available asset and resource.
2. The Norwalk CoC is coordinating with regional and state "Reaching Home" efforts to end homelessness. Specific mention is made to the Connecticut Coalition to End Homelessness (CCEH) and the Fairfield 8. The state initiative has set a goal of creating 10,000 units of supportive housing by 2013, and the Fairfield 8 has set a regional goal of adding 2,400 units of permanently affordable supportive housing in the County by 2008. The Norwalk CoC's goal is 100 units. Norwalk's Consolidated Plan staff is a regular attendee at the Norwalk CoC meetings in order to promote coordination in the city's planning efforts around homelessness.
3. The Norwalk CoC works on both the 'front' and 'back' ends of the homelessness cycle to prevent homelessness. On the 'back' end, the CoC works to provide seamless 'follow-on' support for homeless families and individuals that have been moved through the transitions of homelessness onto more permanent and independent living arrangements. On the 'front' end, the CoC advocates for affordable housing, outreaches to soup kitchen and food pantry clients (sometimes at the threshold of homelessness), and promotes education and awareness of the issue of homelessness.
4. The structure through which the CoC addresses homelessness in our area is both large and diverse. Through a consortium consisting of some 30 non-profit organizations, 20 state and local agencies, 20 local service providers, and a number of developers, businesses and business organizations, and area funders, The Advocates Group (TAG) coordinates over 100 meetings and activities per year, organizes the CoC and both creates and navigates the institutional structures that are part and parcel of addressing homelessness in Norwalk.

5. Most of the persons discharged from public institutions reenter the community from Connecticut state institutions, and for that reason, TAG has directly involved itself with state agencies (Department of Corrections, Department of Children and Families, Department of Social Services, Department of Mental Health and Substance Abuse / DMHAS, etc.), and state organizations (The Connecticut Coalition to End Homelessness) on a collaborative basis to evaluate and modify the patterns of re-entry and homelessness. Housing placement services (which avoid emergency shelters) are being developed and improved as integral steps in state discharge policies. Better prisoner re-entry support is one of the priority needs identified by the community during the citizen participation process, as this population is typically too poor to afford housing, yet barred from most public housing assistance, and statistically prone to recidivism when forced to return to the same locations from which their criminal behavior originated.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

3-5 Year Strategic Plan ESG response:

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1. Norwalk's chief non-housing community development needs relate to its themes of reversing the Achievement Gap and the Economic Re-engagement of vulnerable

subpopulations. More specific needs and objectives are listed in the Objectives Table, and in Table 2B, and include such items as after-school programs, gang prevention, facilities serving children in low- and moderate-income areas, addiction recovery, business development, senior services, and prisoner re-entry.

Data from the State Department of Education provide some perspectives on Norwalk's achievement gap, discussed earlier in this document. It also shows that per pupil expenditures are high in Norwalk, and so this Plan does not call for increased expenditures on Norwalk's school system.

Passing CT Mastery Tests 2003-04

	Norwalk	ERG	State
4th Graders	0.35	0.33	0.42
6th Graders	0.29	0.34	0.46
8th Graders	0.31	0.33	0.46

Figure 10: CT Mastery Tests 2003-04
Source: Connecticut State Department of Education

Connecticut State Department of Education 2000-2001 Net Current Expenditures per Pupil (NCEP)

Rank	District Name	Net Current Expenditures (NCE)	Average Daily Membership (ADM)	NCEP
2	Greenwich	\$103,737,442	8,577.30	\$ 12,094.00
4	Westport	\$55,708,076	4,788.30	\$ 11,634.00
16	New Canaan	\$40,085,146	3,763.10	\$ 10,652.00
18	Darien	\$39,262,253	3,806.60	\$ 10,314.00
21	Stamford	\$155,188,155	15,095.50	\$ 10,280.00
28	Norwalk	\$110,938,352	10,945.00	\$ 10,136.00
51	Wilton	\$36,557,750	3,932.00	\$ 9,298.00
	Statewide	\$5,018,147,832	558,920.00	\$ 8,978.00

Figure 11: 2000-01 Expenditures per Pupil
Source: Connecticut State Department of Education

However, it does fall within the scope of the CDBG program's primary objective to provide "a suitable living environment" and "expand economic opportunities" for LMI persons. In that spirit, the Plan supports the community's stated priority to support its children outside of school, so that they can be safe, healthy, and prepared to learn when they show up to school, so that they may best avail themselves of the public education Norwalk has to offer, and so that they, in turn, may "expand their economic opportunities."

2. See Priority Needs Analysis and Strategies, page 17.
3. See General Questions, #3.
4. The foregoing sections of the plan have discussed three major themes, or generalized high-priority needs: reversing the Achievement Gap, Economic Re-engagement, and the Deconcentration of Poverty. These three themes comprise this Plan's long-term objectives in accordance with the referenced statutory goals, and the

primary objective of the CDBG program. The more detailed needs and objectives, as listed in the Objectives Table, comprise the community's short-term objectives, or interim steps and strategies for meeting the long-term ones.

Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.

2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic Plan Antipoverty Strategy response:

Each of Norwalk's three goals – to reverse the achievement gap, economically re-engage vulnerable subpopulations, and to deconcentrate poverty – is part of its antipoverty strategy.

It is useful to note how many families in Norwalk there are at what levels of poverty. The following tables will illustrate. The per-month dollar amounts indicate what that family's housing allowance should be at 30% of their gross monthly income. ("Fair Market Rent" for a two bedroom is, at the writing of this document, \$1,437/month.)

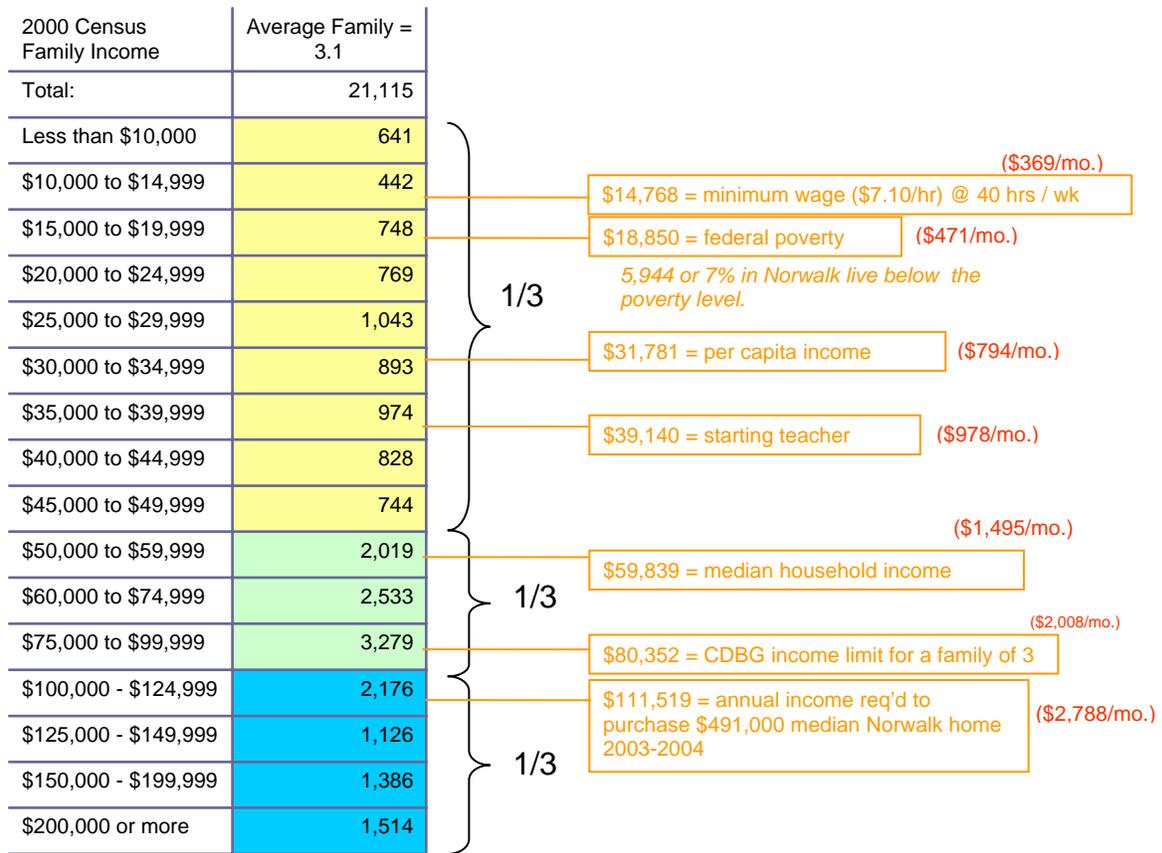


Figure 12: Income Distribution for Norwalk Families with Benchmarks
 Sources: US Census, Connecticut State Department of Labor, HUD, Norwalk Department of Personnel and Labor Relations

The population living below poverty level is described by age in the table on the following page.

	Norwalk city, Connecticut
Total:	82,243
Income in 1999 below poverty level:	5,944
Under 5 years	391
5 years	171
6 to 11 years	748
12 to 17 years	474
18 to 64 years	3,521
65 to 74 years	278
75 years and over	361
Income in 1999 at or above poverty level:	76,299
Under 5 years	5,029
5 years	890
6 to 11 years	5,739
12 to 17 years	4,589
18 to 64 years	50,538
65 to 74 years	5,314
75 years and over	4,200

1,784 children below poverty level in Norwalk

Figure 13: the Poverty Line - Who's Above and Below
Source: US Census

Affordable housing, again, is an important thread running through this topic. Certainly, homeownership is widely held to be one of the most reliable vehicles to wealth creation. While many affordable homeownership mechanisms restrict resale prices, nevertheless, equity accumulation and the ultimate investment of that equity, potentially, into other local property remedies the subject's poverty, provides the stabilizing influence of homeownership to his neighborhood, and acts as a bridge to additional – usually larger – residential property investment in the city.

As for rental property, in Norwalk, affordable rental property is, quite simply, housing for working families. According to the census – whose data is already 5 years old – 32% of Norwalk's households spend over a third of their income on housing, and of that 32%, over 54% are spending more than 50% of their income. In other words, a significant portion of the 'need' for affordable housing, including rental housing, comes from existing Norwalk residents who work hard enough to pay for market rate housing, but only at the cost of sacrificing critical household budgetary principles which cripples their ability to become financially secure in the future.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

3. Describe the basis for assigning the priority given to each category of priority needs.

4. Identify any obstacles to meeting underserved needs.

5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

1.

Seniors

With the imminent retirement of the baby boomers, the number of Norwalk’s elderly is expected to increase. However, this population is not expected – in the short term – to require many services, being, in general, a more active and independent cohort than their predecessors. (One significant trend that is emerging among this population though is increasing guardianship responsibilities, a phenomenon that may prove ripe for a community development initiative within the next 5 years.) This plan estimates that, for the population between 65-75, only about one in five seniors require assistance; from ages 75-85, this figure changes to one in three; by age 85, most seniors are in need of some form of assistance or another.³³ Extrapolating from the 2000 census, Norwalk’s senior population aged 80 and over is estimated at approximately 4,600 persons, of which, a third may be expected to be LMI, and 360-400 live below the poverty level. Some portion of this low-income, 80+ y.o. population constitutes the ‘frail elderly,’ is not significantly more populous, and is the primary target for CDBG assistance under this Plan. In short, the needs and service levels for this population are not expected to change significantly from their current status, the more significant demand emerging beyond the horizon of this 5-year Plan.

Mental Health and Addiction

According to statistics provided by the State Department of Mental Health and Addiction Services, trends for mental health and substance abuse admissions for Norwalk residents have both been on the rise. The graphs below illustrate the trends.

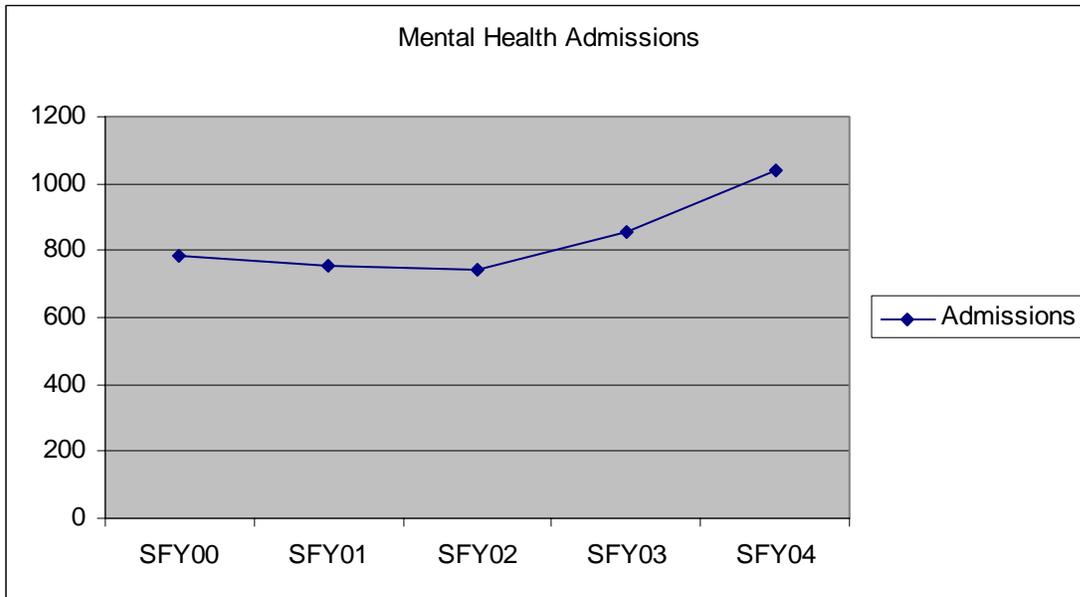


Figure 14: Mental Health Admissions for Norwalk Residents
Source: Connecticut State Department of Mental Health and Addiction Services

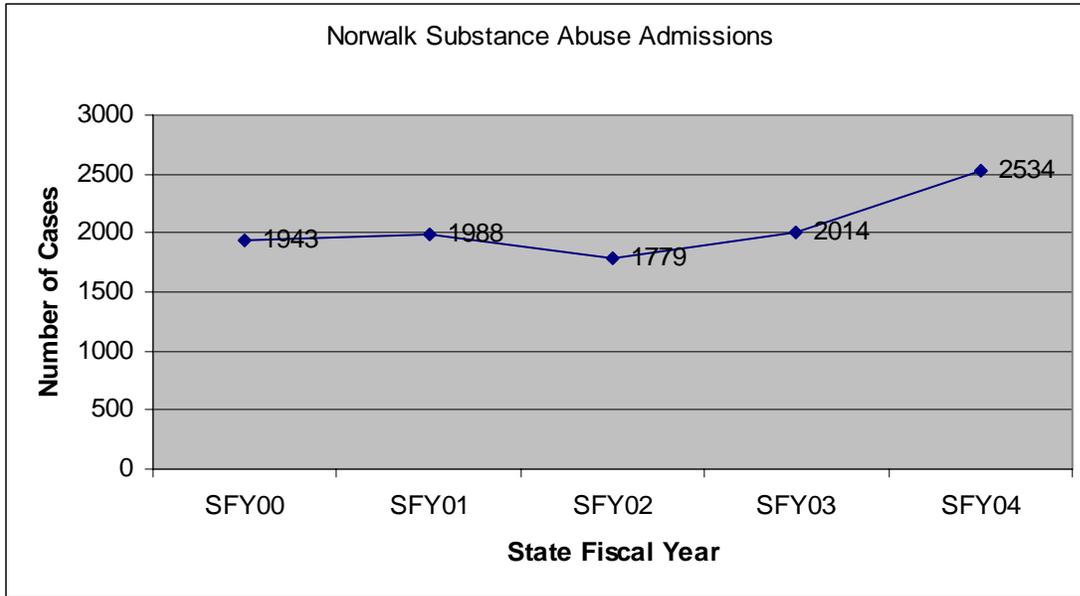


Figure 15: Substance Abuse Admissions for Norwalk Residents
Source: Connecticut State Department of Mental Health and Addiction Services

Disabled

In the 2000 census, 12,769 Norwalk residents identified themselves as having a serious disability. Disabilities are varied, and this Plan does not have a breakdown of which disabilities and in what quantities are included in this number. However, during the citizen participation process, a need was identified for increased accessibility to after- and out-of-school activities for children with physical disabilities.

2. See Table 1B.
3. See Priority Needs Analysis and Strategies, page 17.
4. See General Questions, #3.
5. Supportive housing and discharge policies and measures are discussed under Homeless Needs.
6. This Plan anticipates ongoing usage of all tenant-based rental assistance (TBRA) currently provided to Norwalk, as well as the potential use of other TBRA that it applies for in pursuit of the 80 Fair Street project, the Leonard Street project, and other as-yet undefined projects that may arise in the next five years in the course of Norwalk’s endeavors to provide additional affordable housing.

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Strategic Plan Specific Special Needs Objectives response:

1. Most of the priorities and specific objectives Norwalk hopes to achieve over the life of this Plan fall under the theme of the Economic Re-engagement of vulnerable subpopulations, or of reversing the Achievement Gap. They are listed in the Objectives Table, and include such things as language and literacy development, mental health services (especially for children), senior services, addiction recovery, prisoner re-entry, and violence(/gang) prevention.
2. At the writing of this plan, next year's federal budget shows the elimination of the CDBG program, and the development of a modified program under the Department of Commerce. Should the CDBG program survive in its current state, (and/or should Norwalk continue to receive funding under the modified program), Norwalk will continue to use the resource in partnership with local non-profits and state agencies to leverage maximum resources for addressing the needs of special populations. At the federal level, Norwalk will continue to pursue Continuum of Care funding, ESG, HOME, and HOPWA, and such other federal programs that may be available to it.

Housing Opportunities for People with AIDS (HOPWA)

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts

committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.

5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.

6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response:

Norwalk is not an EMSA. The Mid-Fairfield AIDS Project is a Norwalk-based non-profit that receives HOPWA money, but does so as a subrecipient to the Bridgeport EMSA.

Specific HOPWA Objectives

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Specific HOPWA Objectives response:

N/A.

OTHER NARRATIVE

Include any Strategic Plan information that was not covered by a narrative in any other section.

¹ Joseph McGee, Ed Musante, Joseph Carbone, Clay Fowler, interviews by Michael Moore and Munro Johnson, in Stamford, Norwalk, Bridgeport, and Norwalk, 4 January 2005, 29 December 2004, 8 February 2005, and 10 February 2005.

² US Chamber of Commerce Center for Workforce Preparation, *Workforce Issues: A Top Priority for Chamber Members* (Washington, D.C., 1999), 2.

³ Joseph Carbone, interview by Michael Moore and Munro Johnson, Bridgeport, 8 February 2005.

⁴ Reich, Robert, *The Work of Nations* (New York: Alfred A Knopf, 1991).

⁵ Connecticut State Department of Education; US Department of Education

⁶ Connecticut State Department of Children and Families, as cited in: The Norwalk Discovery Initiative, *Norwalk's Young Children: What They Need to Succeed* (2003) p.13

⁷ Connecticut State Department of Education, as cited in: The Norwalk Discovery Initiative, *Norwalk's Young Children: What They Need to Succeed* (2003) p.9

⁸ The Norwalk Discovery Initiative, *Norwalk's Young Children: What They Need to Succeed* (2003) p.14

⁹ Based on Authors' March 2005 survey of all Participating Providers in the HUSKY Program for Norwalk. The Norwalk Community Health Center, and Dr. Parness on Park

Street are the only pediatricians available in Norwalk to children on HUSKY. The reasons for this are largely thought to relate to the administrative burdens associated with filing claims and reimbursement rates, although HUSKY coverage for the patients is expansive.

¹⁰ Connecticut State Department of Education, *Graduation Rates, 2002*

[<http://www.csde.state.ct.us/public/der/schools/index.htm#gradrates>]

¹¹ Voith, R., "Do Suburbs Need Cities," *Journal of Regional Science*, 38, Issue 3 (August 1998), p. 445.

¹² Lisa Charnoff, "Teen Shot in Face in Norwalk Parking Lot," *The Norwalk Advocate*, 28 March 2005. An excerpt of this story lists other local shootings "* On Jan. 4 16-year-old boy was injured in a drive-by shooting on West Main Street. Kareem Leach, 18, of 36 Fairfield Ave., and Michael Porter, 18, of 11 Ferris Ave., were arrested during the past week and a half for their alleged role in the crime.* On Jan. 24, Thounsa Addison Jr. was killed after he was shot while driving on Cross Street. Court documents indicate the shooting of Addison was retaliation for the Jan. 4 assault.* On March 7, a female cousin of Addison's was shot in the leg while driving on Jefferson Street. * On March 14, the same 16-year-old shot on Jan. 4 was wounded again during mid-day gunplay at the bus depot on Burnell Boulevard. Frantz Maignan, 18, of 156 Suncrest Road, Norwalk, was charged in connection with that crime.* On March 18, nine bullets pierced the windshield of a car in East Norwalk and left the driver with a gunshot wound to the wrist"

¹³ Susan Nova, "Regional roundup: Area has banner year for home sales," *The Norwalk Advocate*, 11 February 2005.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Maxfield Research Inc., GVA Marquette Advisors, "Workforce Housing: The Key to Ongoing Regional Prosperity - A Study of Housing's Economic Impact on the Twin Cities," Minnesota Housing Finance Agency and Minnesota Multi Housing Association, Minnesota, 2001. p 13

¹⁷ Mary Windt, Interview with Mike Moore and Munro Johnson, Norwalk, 25 February 2005.

¹⁸ Candace Mayer, Phone Interview with Munro Johnson, Norwalk, 16 February 2005.

¹⁹ Ibid.

²⁰ 2000 US Census

²¹ Stuart Lane, Telephone Interview with Mike Moore and Munro Johnson, Norwalk, 7 March 2005.

²² Candace Mayer, Telephone Interview with Munro Johnson, Norwalk, 16 February 2005.

²³ Mary Windt, 25 February 2005. Monica Michalsky, Telephone Interview with Munro Johnson, Norwalk, 30 March 2005.

²⁴ 2000 US Census, as compiled by the South Western Regional Planning Agency (SWRPA)

²⁵ Maxfield Research Inc., GVA Marquette Advisors, "Workforce Housing: The Key to Ongoing Regional Prosperity - A Study of Housing's Economic Impact on the Twin Cities," Minnesota Housing Finance Agency and Minnesota Multi Housing Association, Minnesota, 2001.

²⁶ 1990 and 2000 US Census, as compiled by SWRPA

²⁷ Ibid.

²⁸ Candace Mayer, Telephone Interview with Mike Moore, Norwalk, 15 March 2005.

²⁹ Stuart Lane, Telephone Interview with Mike Moore and Munro Johnson, Norwalk, 7 March 2005.

³⁰ National Low Income Housing Coalition, *Out of Reach 2004*, Washington, D.C., 2004. [<http://www.nlihc.org/oor2004/table2.htm>]

³¹ The Housing Development Fund, Inc., a lower-Fairfield County non-profit, has already headed in this direction, amassing significant pools of money. For example, as of November, 2004, it had a fund of \$1.4 million in its “Flexible Lending Pool (to be used for predevelopment expenses, land acquisition, gap financing, and bridge loans). HDF has also established a “Capital for Down Payment Assistance Fund” which as of November, 2004, had grown to \$2.5 million. HDF further developed a “Construction and Permanent Financing” Fund, which has grown to \$25 million. All of these pools are financed by public, private and charitable partners, and leverage many times their value in total contributions to these efforts.

³² National Low Income Housing Coalition, *Out of Reach 2004*, Washington, D.C., 2004. [<http://www.nlihc.org/oor2004/table2.htm>]

³³ Laura Epstein, Interview with Munro Johnson, Norwalk, 4 October 2004.

[Appendices Part One](#)

[Appendices Part Two](#)

[Appendices Part Three](#)

[Appendices Part Four](#)

[Appendices Part Five](#)