

City of Hartford Affordable Housing Plan

Comments Received from AHP Office Hours, Planning & Zoning Commission, and Other City Staff

October 7, 2022

Note: Written public comments received through oneplan@hartford.gov are compiled in a separate PDF document.

CHAPTER I. INTRODUCTION

- Draft a letter from the Mayor
- Obtain higher quality photos of groundbreaking ceremony.
- Add a summary of outreach conducted and update timeline
- Add a layman's explanation for affordable housing rents
- Clarify AMI levels vs. rents

CHAPTER II. INVENTORY OF EXISTING EFFORTS

- Inventory of existing efforts: Add which department is responsible for each program/tool and who can access what. Make this more useful for the public
- Clarify that Hartford's Section 8 program can be used to support homeownership for SF properties.
- Explain that Hartford doesn't have minimum lot sizes. This is an opportunity for more affordability.
- Add more information or contact info for Fair Rent Commission and Fair Housing Officer.

CHAPTER III. HOUSING NEEDS ASSESSMENT

- Note that Census may undercount issues in Hartford, especially for Black/Latino households.
- Add measure of over-crowding from the Census.
- Add more data broken down by race-ethnicity
- Add chart of multifamily rents by asset class
- Add CHFA Housing gap assessment for ownership, not just rental.
- Strengthen conversation around the double-edged sword of rising rents, risk of gentrification, and need for anti-displacement strategies
- Strengthen conversation around the double-edged sword of rising home values.
- Re-organize Market Section - clarify what the key findings are.
- Move summary of opportunities and challenges to the end of Chap III.
- Talk about impacts of COVID on evictions and the impact of the end of eviction moratoriums - eviction crisis is underway.
- Emphasize ongoing issues with poor quality of existing affordable housing projects

- Affordable housing projects struggle with the unpredictability of property taxes. Can be a strain on their operations.
- Highlight link between housing & access to amenities, including public transportation and lack thereof in suburban towns.
- Add more information about the existing supply of senior housing
- Additional challenge: Difficulty of using Section 8 vouchers and finding a good quality unit that meets cost criteria (i.e., units are too expensive, or if they meet the limit, they are in poor condition).
- Suggestion to directly compare current market rate rents in Hartford to 50-60% AMI.

CHAPTER IV. IMPLEMENTATION STRATEGY

- Why aren't there any neighborhood-level strategies? Discuss that this is a citywide plan. Possible action item: Encourage Neighborhood Plans to include affordable housing goals.
- Edit Figure 25 to add Mary Shepard Place project per request from the HACH
- Support for Goal 2, Action 2.c. Require a set-aside for any tax deal projects.
- Support for a disposition strategy for the City (Goal 2, Action 2.d.).
- Under Goal 2, need more funding to close the gap for large-scale addition to apartments – can we increase CRDA funding?
- Under Goal 2, new action item: Encourage ADUs (e.g., increase advertisement, allow pre-approved models, create funding/financing)
- Clarify whether ADUs strategy would be about the actual Regulations or other barriers?
- Explore private market strategies / ways to reduce the cost of development beyond just ADUs?
- Under Goal 2, new action item: Be more proactive with RFP'ing out our local funding sources.
- Under Goal 3, talk about added cost of renovation for historic homes – discrepancy w/ what is available to homeowners.
- Under Goal 3, new action items: Funding for renovation of historic homes
- New action item: Say something about short term rentals
- Add more about the Hartford Land Bank
- Under Goal 5: Add a new action item: Increase counseling for first-time homebuyers.
- Under Goal 7, add action item that outreach should be improved for stakeholders and residents.
- Suggested action item specific to senior housing and assisted living housing
- Suggested action item: Make property taxes for affordable housing projects more predictable over time
- Suggestion to speak to over-crowding in the Implementation Strategy.
- Suggested action item: Adopt an eviction cap or rent cap, or some kind of just-cause for eviction ordinance.
- Suggested action item: Create a new dedicated funding for construction of new affordable homes with restricted sale prices.

Evelyne St-Louis

From: Hartford Planning Division
Sent: Monday, September 12, 2022 8:30 AM
To: Evelyne St-Louis
Subject: FW: Affordable Housing Plan

Categories: Long-Range Plans

From: Casey Moran <moran.casey.p@gmail.com>
Sent: Sunday, September 11, 2022 11:52 AM
To: Hartford Planning Division <oneplan@hartford.gov>
Subject: Affordable Housing Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please contact the helpdesk at 860-757-9411 if you have any questions.

Hi Planning team,

The Affordable Housing draft Plan looks great for the city and its future. I appreciated the report highlighting the importance of new, non-subsidized development as making room for new neighbors and the 10% housing stock growth target. While I know the city recently passed a new zoning code to reduce development cost and streamline permitting, it would have been great if the report highlighted "ways to further reduce the cost of new development" by further improving the zoning/building code.

Something to think about
Casey

Evelyne St-Louis

From: Hartford Planning Division
Sent: Wednesday, September 21, 2022 8:39 AM
To: Evelyne St-Louis
Subject: FW: Feedback on housing report

Categories: Long-Range Plans

From: Denise Wilbur <denisewilbur@gmail.com>
Sent: Tuesday, September 20, 2022 9:01 PM
To: Hartford Planning Division <oneplan@hartford.gov>
Subject: Feedback on housing report

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please contact the helpdesk at 860-757-9411 if you have any questions.

Hi,

First, let me congratulate you on putting together a report that contains such a comprehensive view of affordable housing in Hartford. It's very impressive. Thank you for it.

I know this might be beyond the scope of your work right now, but these are other things on my mind:

1. The report focuses on the availability of affordable housing, but so many people now living in it experience serious difficulties connected with landlord negligence. I did notice a mention or two of "slumlords," but that's a throwaway term. More often it is landlords-- often out-of-town landlords of large investment buildings-- who neglect their buildings, leading to infestations, problems with heating systems, mold, and a refusal to deal with problems promptly as they arise. I'm hoping someone will address the ongoing quality of life in affordable housing, rather than just the availability and soundness of the structures themselves.
2. I also hope that, at some point, the city will address incentives to increase small-scale affordable housing, though legalizing accessory units and/or promoting shared housing options. I live in the West End, where large homes could be easily repurposed for shared living, including shared living for older residents. And there are back yards that could comfortably accommodate mini-homes, including some for aging parents. Of course, this neighborhood is also full of wealthy and influential people who would fight any progressive measures like these. The city, then, would need to have clarity on priorities and message any changes in a way that draws upon our collective obligation to serve the public good.
3. I appreciate the reaching out to suburban communities, but so much there hinges, also, on public transportation. I'm wondering, then, if there's any linkage between efforts to expand affordable housing and efforts to extend bus routes. Goodness knows, you can't live in most parts of Avon or Simsbury unless you have a car.

Thanks for offering this opportunity to respond,
Denise Wilbur

Evelyne St-Louis

From: Annette Sanderson <ASanderson@hartfordhousing.org>
Sent: Wednesday, September 21, 2022 10:36 AM
To: Evelyne St-Louis
Cc: Chambers, Aimee; Mathews, Brian
Subject: RE: Hartford Draft Affordable Housing Plan: Invitation to provide input

Categories: Long-Range Plans

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please contact the helpdesk at 860-757-9411 if you have any questions.

Evelyn, Aimee, Brian:

Thanks for the presentation this morning.

Here is my specific comment regarding Figure 25:

Please add “Mary Shepard Place” to the list of developments in Figure 25. Mary Shepard Place will be a phased project. The first phase is anticipated to start in 2024. There will be 63 units in Phase I. The anticipated completion date for Phase I is the end of 2025.

The stats for the overall project are as follows:

Total Units - 174

Market Rate Units - 35

Affordable Units - 139

% Affordable Units – 20%

Neighborhood – Northeast

AMI Level – at varying AMI levels below 60%

Form of Assistance – Tax Credits

Completion Date – Entire project is anticipated to be completed by the end of 2027

Please let me know if you need any other information from me at this point.

*Annette Sanderson, Executive Director
Housing Authority of the City of Hartford
180 John D. Wardlaw Way
Hartford, CT 06106
Ph # (860)723-8420
Fax # (860)723-8551
TDD #711 or 1-800-842-9710
Email asanderson@hartfordhousing.org*

From: Evelyne St-Louis <Evelyne.St-Louis@hartford.gov>

Sent: Thursday, September 15, 2022 3:15 PM

To: Evelyne St-Louis <Evelyne.St-Louis@hartford.gov>

Cc: Hartford Planning Division <oneplan@hartford.gov>; Chambers, Aimee <Aimee.Chambers@hartford.gov>; Mathews, Brian <Brian.Mathews@hartford.gov>; Davis, Randal <Randal.Davis@hartford.gov>; I. Charles Mathews

Evelyne St-Louis

From: dcosella@comcast.net
Sent: Wednesday, September 21, 2022 5:02 PM
To: Evelyne St-Louis
Subject: Re: Affordable Housing Plan Office Hour Session 3

Categories: Long-Range Plans

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please contact the helpdesk at 860-757-9411 if you have any questions.

Evelyne: Thank you again for the invite. The presentation was very informative. I can see a ton of work has gone into it and it will be very good for the City.

I especially like the idea of encouraging (or requiring) a set aside for affordable units in all new developments. This is so important as lower income residents will have an opportunity to live in all parts of the City. Developers are getting large City or State subsidies for these new projects and, as a result, there should really be no push back.

Property taxes on nonprofits or others offering affordable housing to City residents need to be handled in a consistent manner. This issue is probably outside the scope of your plan but wanted your group to be aware of the issue.

David Osella (not John Scully)
Board President - Immanuel House
15 Woodland Street
Hartford, CT 06105

On 09/20/2022 8:32 AM Evelyne St-Louis <evelyne.st-louis@hartford.gov> wrote:

Update: Please use the Microsoft Teams link below (not Webex). Apologies for the confusion.

Affordable Housing Plan Office Hours Session 3

3:00 PM - 5:00 PM Wednesday, Sep 21 2022

[Join Teams meeting](#)

Evelyne St-Louis

From: McIntosh, Patricia
Sent: Wednesday, September 21, 2022 10:31 AM
To: Evelyne St-Louis
Cc: Chambers, Aimee
Subject: RE: Draft Affordable Housing Plan: Input from City Staff

Categories: Long-Range Plans

Hi Evelyne and Aimee,

Thank you both for a great presentation and discussion opportunity. Journey Home will be discussing this at 11. Curious to know if you will be present for that discussion?

I also very much so appreciated the succinct PowerPoint review. Nicely done.

Thanks,
Patricia

From: Evelyne St-Louis <Evelyne.St-Louis@hartford.gov>
Sent: Wednesday, September 7, 2022 9:36 AM
To: Evelyne St-Louis <Evelyne.St-Louis@hartford.gov>
Cc: Hartford Planning Division <oneplan@hartford.gov>; Chambers, Aimee <Aimee.Chambers@hartford.gov>; Mathews, Brian <Brian.Mathews@hartford.gov>; I. Charles Mathews <I.Charles.Mathews@hartford.gov>; Davis, Randal <Randal.Davis@hartford.gov>
Subject: Draft Affordable Housing Plan: Input from City Staff

Good morning everyone,

The Housing Division and Planning & Zoning Division have put together a Draft Affordable Housing Plan, which you can download here: <https://www.hartfordct.gov/Government/Departments/DDS/DDS-Divisions/Planning-Zoning/Affordable-Housing-Plan>

This Plan was developed both to address recent State legislation mandating that every municipality in the state prepare an affordable housing plan (CGS Section 8-30j) and to engage with Hartford's local affordable housing needs.

The Affordable Housing Plan is a five-year strategy document that outlines the City's current efforts related to housing affordability; assesses the city's housing needs, opportunities, and challenges; and finally, sets a vision, goals, and specific actions related to housing affordability for the next five years.

We are looking for input from various City divisions/departments on this draft plan. We welcome internal comments from City staff until Wednesday September 21, 2022. Please send your written comments to oneplan@hartford.gov. You can call me (ext. 9083) with any clarifying questions.

Note that we are also seeking the community's input on this draft. Members of the public are invited to send comments until October 3, 2022, so please feel free to share this Draft Plan more widely with your networks. Written comments from the public should be emailed to oneplan@hartford.gov.

Evelyne St-Louis

From: YAH00 MA!L <barridoncorp@aol.com>
Sent: Thursday, September 22, 2022 8:31 AM
To: Evelyne St-Louis; Chambers, Aimee
Cc: Morin, David - PRA
Subject: Re: Affordable Housing Plan Office Hour Session 3

Categories: Long-Range Plans

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please contact the helpdesk at 860-757-9411 if you have any questions.

Hello Evelyne St-Louis & Aimee Chambers,

Questions from Office Hours Session yesterday:

How can we in Parkville Community Association
Specifically Parkville Revitalization Association,
(N.R.Z.) work to achieve the goal of increasing
affordable housing in our own neighborhood?

Are there viable/accessible sources for funding
this effort? For developers, individuals as well
as non-profits. How do we realize vision of plan?
See action steps, but, not enough details of how
to actually carry out when starting developments
or when reviewing projects for our Neighborhood.

Respectfully,

David Morin
President (N.R.Z.)
Parkville Revitalization Association
Cell Phone # (860) 830-5292
Email: barridoncorp@aol.com

In a message dated 9/21/2022 12:13:13 PM Eastern Standard Time, Evelyne.St-Louis@hartford.gov writes:

-----Original Appointment-----

From: Evelyne St-Louis
Sent: Tuesday, September 6, 2022 5:23 PM
To: Evelyne St-Louis; Chambers, Aimee; Mathews, Brian; dberto@housingenterprises.com;
maryp@parkwatershed.org; ewolfe@sheldonoak.org; tealeink@gmail.com; dcosella@comcast.net; Matthew
Straub; donclarkala@aol.com; dcthedon@aol.com; Maliha Ahsan
Subject: Affordable Housing Plan Office Hour Session 3
When: Wednesday, September 21, 2022 3:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams link below



Trinity College

HARTFORD CONNECTICUT

September 27, 2022

Planning & Zoning Commission
City of Hartford

Dear Planning & Zoning Commission Members,

As a Hartford resident, I would like to offer my strong support for the adoption of the Draft Affordable Housing Plan. I was impressed by the professionalism, research, thoughtfulness, and analysis that went into the report, and I believe the plan will serve Hartford well.

First, I believe the Department of Development Services does an excellent job explaining the “why” for the plan. While some could suggest that Hartford does not need an affordable housing plan given its ~40% stock of affordable units, I agree heartily with the plan that this juncture is an “opportunity to be forward looking and thoughtful in how to produce and preserve high-quality, diversified, and affordable housing options in Hartford.” This reasoning feels particularly salient in light of the deep history of socio-economic injustice that has harmed, excluded, and disenfranchised low-income communities of color in Hartford for decades through redlining, exclusionary practices, disruptive highway construction, concentrated public housing projects, and other unjust practices.

Furthermore, I appreciate that the report goes beyond available affordable housing stock—essential though that is—to also consider housing quality. As the report points out, Hartford housing is older than housing stock elsewhere in the county and state. Aged housing brings with it important equity issues, such as unsanitary conditions, disrepair, environmental risks such as mold and lead, and other concerns. As such, I very much agree with Goal 3 in the plan, “Improve housing quality and invest in existing affordable housing.”

In summary, I believe that the Draft Affordable Housing Plan provides expert, nuanced, multi-faceted, and overdue context, analysis, and vision for the future of affordable housing in Hartford. I commend the Department of Development Services for their excellent, equity-minded, and efficient work on this important plan.

Please vote to approve the Draft Affordable Housing Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "David Kurz".

Dr. David Kurz
Environmental Science Program
Trinity College



Comments on Hartford Municipal Affordable Housing Plan Draft ver. 9/6/22

October 2, 2022

We are writing to submit feedback on the draft Hartford Municipal Affordable Housing Plan.

About us

Summer of Solutions Hartford (SOS) has been running a summer teen employment program for about a decade in Hartford. It's based at our gardens on two long-empty housing lots in Frog Hollow. Our neighborhood is one of the poorest zip codes in the state, and many of our neighbors deal with addiction as well as the violence of poverty and gentrification.

Since the pandemic began, we shifted our emphasis to mutual aid, distributing groceries, cleaning supplies, baby needs, etc. We offer raised garden beds to community members, and we maintain two free sidewalk pantries in town. More recently we've also organized crowdfunding for rent, utilities, and pre-trial bail. Our coordinating committee are all tenants, current and former residents of Hartford.

Theoretical Framework

We have approached our review of the draft plan through our lived experiences as renters, some of us formerly homeless people, within a framework of human rights, intersectional feminism, and anti-racism. We believe that housing is a human right, and that safe, dignified shelter for all humans is the foundation of thriving, resilient communities.

Summary of Recommendations

Our comments and suggestions can be summarized as follows:

1. The plan should center the needs of women-led households.
2. The plan should use length of occupancy as a measure of success. Strategies and tactics for housing affordability should increase housing stability for Hartford residents, rather than promote mobility.

We believe that these two imperatives are mutually reinforcing, and would have the knock-on effect of improving all other markers of quality of life and economic abundance in Hartford.

I. Center women-led households

Landlords, including public housing authorities, file the majority of evictions in Connecticut against Black and Latinx women (CT Data 2021 Evictions Report). It is well documented that these women are the lowest earners, with the lowest educational attainment, and further burdened with lack of access to childcare, and healthcare, even while they are over-represented in service sector jobs - when they are employed - and unpaid family care work.

This draft plan itself acknowledges the challenges and harms that impact the lowest-income households - they are over-represented among cost-burdened households, eviction filings, and unsafe or low-quality housing, as well as locked out of opportunities for homeownership, or mobility to access other opportunities.

Anecdotally, the majority of requests for basic needs assistance that we receive at Summer of Solutions come from Black and Latinx women with young children. Consumer price inflation, the baby formula shortage, severe rent and utility increases, plus the loss of wages and childcare due to the Covid pandemic and other health problems, have multiplied the difficulty of making ends meet in Hartford. These families have reported long hold times, discriminatory treatment, lack of funds, and unresponsiveness from the proliferation of non-profit institutions in Hartford that are supposed to bridge the gap. They turn to us through word of mouth, even with our extremely modest grassroots capabilities.

Improving the conditions and affordability of housing for low-income women of color in Hartford will raise the floor on quality of life for all other city residents, and set up future generations - their children - for the stability and well-being needed to maintain Hartford's viability as an urban center that can support its own residents.

II. Increase length of occupancy

To that end, we believe that length of occupancy, paired with additional measures that contribute to healthy, stable homes, is the most important measure to improve quality of life for Hartford families.

Over 75% of Hartford residents are tenants, and over half are cost-burdened. Federal and state emergency measures during the first 2 years of the Covid pandemic did not protect tenants from no-fault evictions, illegal lockouts, security deposit theft, nor the direct medical costs and lost wages of living in unhealthy conditions.

We do not agree that home ownership is the end-all and be-all of municipal housing policy. We acknowledge the unique revenue challenges that are faced by the city of Hartford. And we support the desire of those who wish to own and occupy their own property in Hartford or elsewhere. But as for the municipality itself, we would rather see a lighter hand on fees, fines, and taxes to the lowest-income residents, and a firmer stance on collecting revenue from business entities, including non-profits and universities, especially a draw-down on tax abatements for corporate tenants and developers.

We believe initiatives to raise the health and safety of existing housing, urgent and creative solutions to buffer the impacts of severe market swings on housing costs, and improve the city's resilience to future severe weather - ensuring that everyone who wants to make their home and raise their family in Hartford can stay here - will bear greater long term benefits for the city as a whole.

Suggested Plan Initiatives

- Declare housing a human right and enact a local right to shelter law.
- Cease and desist all arrests for panhandling and loitering.
- Set the local minimum wage at or above the city's average housing wage rate.

- Immediately implement a local eviction and foreclosure moratorium until the City has filled and trained the maximum appropriate number of housing inspectors (at least 20), cleared the backlog of complaint-based housing inspections, and aided low-income homeowners in completing needed repairs.
- Inventory all available residential units, including commercial properties; deploy rapid rehabilitation crews to make vacant units safe and compliant with building and health standards; and offer them to families and individuals in the city's shelters, with priority to people with generational, family ties to Hartford.
- Create a local ordinance that pegs rent increases to real local wages and building conditions. The Fair Rent Commission complaint system is an affirmative process that places the burden on tenants to seek relief from landlords' profit motives. A set range for a fair increase holds landlords responsible for building upkeep, while protecting tenants from extreme swings in the housing market.
- Create an interest-bearing (per existing state law) escrow fund for all security deposits, to be released only when all parties to the relevant lease agree on the condition of the apartment and any needed repairs not due to prior condition or landlord negligence. We also note this would dovetail with Substitute House Bill No. 5234 regarding preoccupancy walkthrough inspections (introduced in the General Assembly in April 2022) were it to be reintroduced next session.
- Update the City's zoning code to allow co-habitation and co-ownership by chosen family, with reasonable limitations based on available bedrooms, and compliance with health and safety requirements. Promote legal and financial structures that allow multigenerational and chosen intentional families to share property ownership and build equity. Forms such as tenancy in common, and limited equity housing co-operatives are examples.
- Declare zero tolerance for lead poisoning and asthma. Drastically ramp up lead testing for all children in the city, abate all interior lead and sources of asthma triggers (such as rodents and roaches), and fund treatment programs. Furthermore, create testing and treatment programs for Hartford adult residents that were exposed to lead and asthma triggers as children in Hartford, and have dealt with or will deal with mental and physical health impacts over their lifetime as a result.

Additional Notes on Draft Plan Content

Overall, the goals and implementations are the most important part of this document, and yet this draft is repetitive, inconsistent, and not specific. Many of the stated goals and implementations are not specific or measurable (i.e. SMART goals).

Vision statement and Goal 1

It is not the remit of the City of Hartford to plan or develop initiatives for any region outside of city jurisdiction. Certainly, there are options and solutions to be explored through the auspices of CRCOG, or work with the state delegation to reinstate county administration. While we acknowledge that this document satisfies the requirements of a state law, it is also resident-facing, and this plan should center Hartford and its residents.

Goal 2

The goal of increasing density is at odds with the numerous mentions throughout the plan of encouraging homeownership through construction of single family homes or 2-unit owner-occupied housing. How will the city address the shift to work-from-home, with large corporate tenants declining to renew their office space leases, and the overall high cost of living in the region, vis a vis the goal to convert workers into residents, and increase density?

Goal 3

Improving and investing in existing affordable housing - this should be a top priority. Bring existing housing up to code, exceeding health and safety standards, and moving forward with climate-resilient upgrades through programs that hold landlords accountable but also properly incentivize them to complete the upgrades.

There should be a zero-tolerance policy for lead-poisoned children. Lead paint has been banned for over 40 years, and there is simply no excuse for this toxin to still be impacting children in their homes. It is unacceptable for the city to claim a decrease of only 25% to be an ambitious goal. Hartford families deserve to feel that their children's lifetime development is not being harmed at home.

Goal 4

There are too many resources for tenants, and not enough education about tenants' rights and available programs. Certainly, Hartford should increase financial resources that will benefit tenants, but the housing and homelessness ecosystem, consisting of municipal and private non-profit entities, needs to be streamlined and cleaned out. The

City should genuinely consider which programs should be brought back within municipal offices rather than outsourced to private entities with large overhead and admin costs.

Goal 5

See our suggested initiative on non-traditional ownership.

Goal 6

The imperative to center women-led families, and other vulnerable populations as noted including city elders, disabled residents, and veterans, will improve housing stability and prevent homelessness. Protecting tenants from spiking rents and utility costs, investing heavily in housing safety and quality, and additional anti-poverty measures including a local living wage, will keep many more Hartford families from the risk of homelessness.

We agree that the city's homelessness response should be premised on "housing first", paired with wraparound services determined by the individual or family, are the best approach.

We also note the dire lack of shelters and transitional housing, and inconsistent response on social service intakes and placements we have experienced and also heard anecdotally from the community.

The homelessness and social service sector was intended to be streamlined through the CAN system, with 211 as the point of entry, and shared documentation among agencies. This program initiative has failed to end homelessness in the region, and services seem to be no easier to access nor has it improved outcomes in more than a decade.

Implementation Actions: The stated implementations are post hoc programs that do not address the root causes nor prevent homelessness. Best practices exist in other jurisdictions in this country and region, and Hartford should emulate or exceed them.

Goal 7

The POCD statements paired here do not match the stated goal, and the stated goal should be combined with Goal 4.

Lack of awareness of tenant rights, and lack of capacity to exercise those rights, are a harmful disadvantage to Hartford tenants.

Regarding the statements pasted here from the POCD: how many marketing campaigns will the city throw money at? Over the years, the city has invested in a rotating portfolio of logos, taglines, billboards, and tax abatements. Invest in the basic needs and the stated desires of existing residents, let families grow and thrive, and the city will speak for itself.

Implementation Actions: We suggest investing more in TV and radio than in social media and newsletters (whether print or digital) as these media are more accessible to tenants. Social media platforms change in popularity, internet access and use are by no means universal, email newsletters are poorly designed and require opt-in, and the city has yet to provide adequate language or literacy access to its existing communications. Keep it simple and use what is accessible to the least savvy, who need the information the most.

Goal 8

Revise this goal to make the city proactively anti-racist and anti-poverty, and draft measurable initiatives with the funding to back it and make it happen. For example, declare a goal to eliminate the structural factors that create racialized, gendered poverty.

The reality is, this goal is at odds with the economic incentive structure that the city and its business interests subscribe to. This has more to do with behavioral psychology than with zoning laws or funding programs. The rights and wellbeing of poor tenants of color are at odds with the private property rights and profit motive of real estate speculators and landlords.

Implementation Action: This is un-actionable and un-accountable, and frankly lazy. Set SMART goals to show the city's commitment to anti-racism, and eliminating racialized poverty, then set out specific housing-based implementations that will realistically achieve those goals. Vaguely gesturing to the other goals is disrespectful and careless.

Data Transparency and Appendices

Appendix B, Fig. 28 and 29 - this granular data on all CT towns is not germane to Hartford's Municipal Affordable Housing Plan. This information would be helpful to CROG or the city's state legislative delegation.

In the research we undertook to respond to this draft plan, we found a number of key datasets that would be highly relevant but are completely missing or effectively inaccessible to the public.

- The disconnect between the owner listed on the Tax Assessor's property card, and the members listed in the LLC documentation hides what the true distribution of ownership is in Hartford. This puts tenants and advocates at a disadvantage, of not knowing where their payments go, who is responsible for the safety of their home, what their vested interests or political influence are, etc. - and obviously also prevents tenants from organizing and collectively bargaining.
 - How many landlords are there in Hartford, disaggregated from LLC's and other ownership structures?
 - What size are the buildings in their portfolio?
 - For how long - what are the building sale turnover rates?
 - What percent of Hartford's total housing stock do they own?
- We would have also liked to see detailed data from the Fair Rent Commission: statistics from complaints, hearings, and decisions.
- Housing court statistics are extremely limited. With the understanding that this is a matter for the state legislature, we believe that more detailed demographics on the households involved in eviction filings would elucidate better ways to prevent evictions in the first place, and to increase housing stability, and all other quality of life measures. The data is simply not collected or reported by the judicial branch. (See methodology notes in the 2021 Evictions Report from CTData.)

We appreciate the efforts of the Planning Department to (belatedly) fulfill this requirement of 8-30j. Unfortunately, much of the content of this draft reads like an economic development plan that tries and fails to anticipate market changes. While we recognize that housing and economic development are interdependent, we know that the economy is made up of individuals and families. The housing market has names, faces, basic needs, and human rights. These basic needs are not prioritized in this plan. Given the longstanding policies and practices that have created inhumane conditions in Hartford— and which this plan acknowledges— they are not addressed with the urgency and resourcefulness required to give meaning to the plan vision.

Stabilizing housing for the least privileged of Hartford's residents will set a strong foundation for the local economy for future abundance and resilience. Hartford's women-led households must be the first and foremost client of this plan.

Links to references are below. We hope this has been useful, and we look forward to the progress of the plan with urgency and justice in all deliberations.

Allie McConnell
For Summer of Solutions Hartford
Allie.McConnell.Hills@gmail.com

Evictions Report
<https://www.ctdata.org/evictions-report>

Preoccupancy walkthrough bill
<https://www.cga.ct.gov/2022/fc/pdf/2022HB-05234-R000591-FC.pdf>

Evelyne St-Louis

From: Hartford Planning Division
Sent: Tuesday, October 4, 2022 9:06 AM
To: Matthew Straub
Cc: James Horan; Kasey LaFlam; Debi Martin; Evelyne St-Louis
Subject: RE: LISC Feedback- Affordable Housing Plan

Hello Matt,

Received, thank you for your input.

Best,

Paige Berschet
Administrative Assistant
City of Hartford - Department of Development Services
Planning & Zoning Division
she/her/hers
260 Constitution Plaza, 1st Floor
oneplan@hartford.gov
Desk: 860-757-9029

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From: Matthew Straub <MStraub@lisc.org>
Sent: Monday, October 3, 2022 5:34 PM
To: Hartford Planning Division <oneplan@hartford.gov>
Cc: James Horan <JHoran@lisc.org>; Kasey LaFlam <KLaFlam@lisc.org>; Debi Martin <DMartin@lisc.org>
Subject: LISC Feedback- Affordable Housing Plan

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Hello-

Thank you for the opportunity to provide feedback! Overall, we found a lot to like in the plan, however we've identified the following areas to offer comments:

- We greatly appreciate the focus on rental and sales market trends and the housing gap analysis. This provided clear context for the plan.
- The plan does not offer concrete actions in goal 8, Advance racial and socio-economic equity. Its placement in the plan and its actions only consisting of referrals to other sections render it an afterthought. This could be better advanced as goal 1, offering a clear framework for how the remaining goals and actions help to advance this ultimate goal.
- The plan offers clear goals for the creation of homeownership opportunities, but does little to address the stated issue of low-quality housing stock for homeowners. Dedicated funding streams are available to address substandard rental housing, but little is available for owners of single-family or small multi-family homes to address housing quality issues, a pervasive concern in communities with disinvested housing and ongoing appraisal gap issues.

- The plan leads with a goal of advocating for a regional approach to affordable housing. While this is a good overall goal, it sets a tenor that feels incompatible with the overall goal of a City housing plan. The plan shouldn't lead with a first action of "help Section 8 voucher holders move out of Hartford." This goal should be de-emphasized, at minimum beyond goal/action 2 and 3.
- The role of the NRZs is de-emphasized in the plan. We see this as a missed opportunity to better integrate community input in the implementation of the plan. It's unclear as to how community input may have impacted any of the goals outlined, and it appears that NRZs are only specifically mentioned in the outgoing communication of resources, but generally not offering any proactive feedback.
- The plan does not consider LISC or other CDFIs as partners in the plan. CDFIs are an integral part of the affordable housing development ecosystem, providing substantial acquisition, predevelopment, and construction capital in the City of Hartford. CDFIs are key in offering access to capital, inclusive of higher leverage and more patient capital than typical financial institutions. A closer relationship between the City of Hartford and the CDFI community would meaningfully improve the affordable housing development process in Hartford.
- The plan is inconsistent in how it names specific partners in certain neighborhoods or who take on specific activities. At minimum, the city's CDCs should be noted consistently in the plan, particularly in the section about upcoming projects.
- Affordable development continues to be concentrated outside of downtown areas. While we understand the desire and need for new market rate housing, the limited number of affordable units are also generally affordable at higher rates that are more consistent with a "workforce housing" designation, 80-120% AMI. 80% AMI for a single person is approximately \$62,000/year, far above the median in most Hartford census tracts. A focus on offering more deeply affordable units in new downtown developments would be welcomed.

We welcome the opportunity to discussion any or all of the above comments. Thank you again for this opportunity!

Matt

Matthew Straub, Senior Program Officer- Lending and Investments

Pronouns: he/him/his

LISC Connecticut

Local Initiatives Support Corporation

T 860.525.4031

E mstraub@lisc.org

www.lisc.org/connecticut

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Dear Hartford Planning and Zoning Office,

On behalf of the Non-Profit Accountability Group, Sierra Club Connecticut, Sunrise CT, and Connecticut Citizens Action Group, and CT Renews we thank you for the opportunity to comment on the Draft Affordable Housing plan for the city of Hartford.

We believe that Housing is a human right. All people deserve safe, affordable housing. Unfortunately, Hartford is not currently meeting that need for its residents. If there is truly going to be an equitable affordable housing plan in Hartford, we must consider that each individual has different circumstances and needs, and therefore may need different resources and opportunities in order to thrive. Not only is there a lack of affordable housing (for Hartford residents) in general, but due to the eviction moratorium ending, folks are being moved out and priced out of their current homes. The homeless rate is skyrocketing and the emergency shelters are at capacity. This is exacerbating an already untenable situation. The immediate crisis is not being met and current safety nets in place are not getting to the folks that need them the most. Nor are the root causes of homelessness being addressed. And with a high representation of Black, Brown, and frontline communities facing eviction, it is imperative that we live up to the global housing rights standards determined by the United Nations Committee on Economic, Social, and Cultural Rights.

We applaud the efforts of the office in putting together a more than necessary five year plan to address the Housing Crisis the city, and much of Connecticut, now faces. We support improvements to current affordable housing, such as weatherization and lead paint remediation. Increasing communication and advancing homeownership are goals we can all get behind. There are some admirable goals in this plan, but it unfortunately does little to equitably address the immediate and future needs of the residents of Hartford.

The current number (40%) of Affordable Housing units in the city is too low to combat the higher concentration of poverty in the city. The poverty rate in Hartford is 28% and the amount of people that are either severely or moderately housing burdened is over 50%. Unfortunately, those who are most housing burdened are those least able to afford any increase in or unexpected expenditures. The plan must ensure on how to get both current and future support systems to the folks that need them the most, ex: rent vouchers.

The plan calls for an increase in new affordable housing and updates to current affordable housing units. However, it does not reexamine housing affordability relative to the needs of the impacted and marginalized communities it aims to serve. Hartford needs fair rent practices like rent caps and the ability to look at situations case by case instead of as a whole which can erase the needs of the individuals. It also doesn't address the stressors caused by the COVID-19 pandemic or the rocketing rate of inflation.

The plan also discusses pushing for "No More Slumlords" but we hold concerns that the plan does not lay out what will actually be done to address tenants' needs and concerns. We would like to see more details on how slumlords and out of state landlord corporations will be held

accountable. Currently, many tenants feel unsafe even voicing their complaints for fear of retaliation or eviction. The housing plan must address these concerns.

Regarding “Goal 7: Communicate and advertise available resources to residents”, we are concerned about the focus on marketing Hartford and getting people to move to the city instead of focusing on educating current Hartford residents on the different forms of assistance and benefits they can access. We would also like to see more focus in this category on making sure information is accessible for Spanish speakers as well.

Another concern is the lack of immediate plans in place to support Hartford residents that are currently facing or will soon face eviction. Considering we are still in a pandemic, it is not fair to turn away people with evictions on their records from accessing housing. A new eviction moratorium going into the winter months would help address this immediate need and addressing stronger eviction prevention language within the Affordable Housing plan would help address future needs.

Finally, the goal of bringing more workers and college students into the city as residents runs the risk of gentrifying neighborhoods, rendering them unaffordable to the current residents. The plan should address the needs of the current residents first and foremost and address the issues facing them before expanding the population, potentially taking away the already limited resources.

Please feel free to reach out to us with any questions.

Sincerely,

Teneya Taylor, Non-Profit Accountability Group
Angel Serrano, Connecticut Citizens Action Group
Kimberly Reindl and Clara Dewey, Sunrise CT
Ann Gadwah, Sierra Club Connecticut
On Behalf of the CT RENEWS Coalition