Community Development Block Grant

Disaster Recovery Program

Substantial Amendment to the Action Plan

Tranche 3

DEPARTMENT OF HOUSING

Evonne M. Klein, Commissioner

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Table of Contents

A. BACKGROUND 1

B. UPDATE OF UNMET NEED 7

C. ALLOCATION OF CDGB-DR FUNDS 11

D. PROPOSED DISTRIBUTION OF CDGB-DR FUNDS FROM TRANCHE 3 19

E. ADMINISTRATION OF THE RESILIENT BRIDGEPORT REBUILD BY DESIGN FUNDS 21

F. STATE ALLOCATION PROCESS 24

G. PUBLIC NOTICE AND INCLUSIVE DECISION PROCESSES (CITIZEN PARTICIPATION) 25

H. CERTIFICATION OF RESILIENCE STANDARDS 33

I. EXHIBITS 33

A. Background

On Monday, October 29, 2012 Hurricane Sandy made landfall near Atlantic City, New Jersey, as a post-tropical cyclone. The storm created a significant tidal surge from the Mid-Atlantic region to New England. After landfall, Sandy headed north by northwest bringing high winds, rain, and storm surge to coastal areas of Connecticut, causing widespread wind damage, flooding, and power outages. On Saturday, October 27, in advance of Sandy's forecasted impact on Connecticut, Governor Malloy signed a declaration of emergency and the following day the Governor requested, and President Obama approved a declaration of emergency.

The size and scope of the storm has been attributed to a convergence of weather systems. As the hurricane pivoted toward land, it merged with a winter storm from the west and cold air moving south from the Arctic. The hybrid storm - with both tropical and extra-tropical characteristics - brought high winds and coastal flooding to southern New England. High wind warnings and coastal flood warnings were issued by the National Weather Service, with storm surge prediction in the range of 6 to 11 feet above astronomic high tide, with 6 to 10 foot waves on top of the surge.

In response to the extraordinary destruction caused by Hurricane Sandy, Congress passed and the President signed into law The Disaster Relief Appropriations Act; also known as Public Law 113-2 (the "Act"), which, among other things, appropriated approximately $60 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act. A significant portion of those funds was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG-DR Program") to be administered by the United States Department of Housing and Urban Development ("HUD").

Governor Dannel P. Malloy has designated the Connecticut Department of Housing ("DOH") the principal state agency for the allocation and administration of the CDBG-DR Program and all associated funding.

As explained in more detail below, the State of Connecticut, through DOH, has received two previous allocations of these federal block grant funds, Tranche 1 - $71,820,000 and Tranche 2

- $66,000,000, totaling $137,820,000. This third allocation (Tranche 3) appears to be the final allocation of CDBG-DR funds to be made to the State of Connecticut, and includes a new component not previously made available.

Tranche 3 consists of $11,459,000 in CDBG-DR funds and $10,000,000 in Rebuild by Design ("RBD") funds intended to support the Resilient Bridgeport initiative, totaling $21,459,000. This Allocation Plan describes the programs and activities for which the State intends to expend the Tranche 3 funding in compliance with the federal requirements set forth in public notice released by HUD on October 16, 2014, in the Federal Register at Vol. 79, No. 200, Page 62184 entitled: "Third Allocation, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy".

In accordance with the Federal Register Notice, for both the Tranche 3 funds and the RBD funds, the State must submit a Substantial Action Plan Amendment to the Action Plan and must be expended by the State in a manner consistent with the Act and all other applicable federal laws and regulations. As in the past, in accordance with Section 4-28b of the Connecticut General Statutes, DOH is required to submit an Allocation Plan for any federal block grants received. Exhibit A is a copy of the State's Tranche 3 Allocation Plan which was submitted to the Legislature for consideration, and is subject to a legislative hearing as noted above. Should any revisions be necessary as a result of that hearing, a revised Allocation Plan reflecting those revisions will be submitted and included in the final Substantial Action Plan Amendment to the Action Plan for Tranche 3 for submission to HUD.

This Substantial Action Plan Amendment to the Action Plan for Tranche 3 provides updates on Tranche 1 and Tranche 2 funds, as well as describes the intended allocation of the Tranche 3 funds, including the RBD funds.

As with the previous Substantial Action Plan Amendments to the Action Plan, this Substantial Amendment must also provide a description of the State's public outreach and citizen participation practices. The State is obligated to ensure that the processes, procedures, and fiscal and administrative controls it will use in the course of expending CDBG-DR funds are sufficient to safeguard CDBG-DR funds from waste, fraud and abuse.

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

In addition to specifying the amount of funds allocated to the State, the Federal Register Notice also sets forth, among other requirements, the areas within the State where CDBG-DR funds can be expended, the programs or activities for which CDBG-DR funds can be used, and the national objectives that each program or activity must meet. The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State.

The only areas in which the Tranche 3 Funding can be expended are Fairfield County, and New Haven County.

The Appropriations Act requires funds to be used only for specific disaster recovery related purposes and the State must detail their proposed use of funds, including criteria for eligibility and how the use of these funds will address disaster relief, long-term recover, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas. In addition, as set forth in the Federal Register Notice, CDBG-DR funds cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of CDBG-DR funds, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a "National Objective"): low- and moderate income benefit; elimination of slum and blight; and urgent need. Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of CDBG-DR funds can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget. HUD has granted a number of general program waivers which have provided greater flexibility to the administration of the program. DOH will make use of these waivers whenever applicable, and reserves the right to request such additional waivers as may be appropriate and consistent with the waiver guidance provided by HUD.

Overview of Substantial Amendment

Federal Requirements – Third Tranche and RBD

On Thursday, June 13, 2014 the Department of Housing received verbal notification from the U.S. Department of Housing and Urban Development that the State of Connecticut was scheduled to receive an additional allocation of federal funds under CDBG-DR. However, no information on the actual amount of funds to be allocated was available at that time.

In mid-October, 2014, HUD promulgated regulations that established the regulatory framework for the receipt and expenditure of the Third Allocation of CDBG-DR Program funds, all as set forth in Federal Register Notice (Vol. 79, No. 200; October 16, 2014 Page 62184) titled: "Third Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy" (the "Federal Register Notice"). Via this Notice, we became aware that Connecticut would receive an allocation of $11,459,000 under CDBG-DR. In addition, the State of Connecticut would be the recipient of an additional $10,000,000 specifically in support of the Resilient Bridgeport initiative pursued by the City of Bridgeport under the Rebuild by Design process managed by HUD.

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

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

- DOH consults with affected citizens, stakeholders, local governments and public housing authorities to update its needs assessment;
- DOH amends its citizen participation plan to reflect the requirement for a public hearing;
- DOH publishes a substantial amendment to its previously approved Action Plan for Disaster Recovery on the DOH Web site for no less than 30 calendar days and holds at least one public hearing to solicit public comment;
- DOH responds to public comment and submits its Substantial Amendment to HUD no later than 120 days after the effective date (February 23, 2015);
- HUD reviews the Substantial Amendment within 60 days from date of receipt and approves the Amendment according to all published criteria; and
- HUD sends a Substantial Amendment approval letter, with revised grant conditions (if applicable), and an amended unsigned grant agreement to DOH.
- If the substantial Amendment is not approved, a letter will be sent identifying its deficiencies; DOH must then revise and resubmit the Amendment within 45 days of the notification letter; and
- DOH ensures that the HUD approved Substantial Amendment is posted on its official Web site.

Use of the Third Tranche Funds

The Appropriations Act requires that these funds be used only for specific disaster recovery related purposes. Consistent with the Rebuilding Strategy, it is essential to build communities back stronger and more resilient. This allocation provides additional funds to Sandy-impacted grantees to support investments in resilient recovery.

In addition to specifying the amount of funds allocated to Connecticut in the third tranche ($11,459,000), the Federal Register Notice also provides an additional $10,000,000 specifically designed to support the Resilient Bridgeport initiative under the Rebuild by Design ("RBD") competition.

Rebuild by Design (RBD) was a planning and design competition to increase resilience in the Sandy-affected region as part of recovery from the storm. HUD conducted the competition under the authority of § 105 of the America COMPETES Reauthorization Act of 2010 (15 U.S.C. 3719). Administered in partnership with philanthropic, academic, and nonprofit organizations, HUD solicited the best talents and ideas from around the world to seek innovative solutions for how communities rebuild and adapt in response to the damage from a disaster and future risks presented by natural hazards and climate change. More regarding the history of the competition can be found in the Federal Register at 78 FR 45551, published July 29, 2013, and 78 FR 52560, published August 23, 2013. The competition resulted in the selection of ten interdisciplinary design teams as finalists to participate in an in depth process. Ultimately, six proposals were announced as winning proposals in June 2014, representing an award of distinction for the respective design teams.

Although the Resilient Bridgeport proposal was not selected as a winning proposal, the $10,000,000 in CDBG-DR funds are being allocated by HUD to reduce flood risk for the most vulnerable public housing stock in the city and to leverage other funding. HUD recognizes that additional planning is required to reassess and re-scope one or more elements of the proposal to identify a pilot project that can be implemented and that the forthcoming project may require greater deviation from the proposal as submitted relative to that of the winning proposals. This funding is to be used for continued study, analysis, planning, and community engagement as well as for design, engineering, and construction of a to-be-identified pilot project. At a minimum, the pilot project must reduce flood risk to public housing in the City's South End/Black Rock Harbor area. In order to allow the time necessary for engagement of community stakeholders regarding selection of a pilot project, the pilot project does not need to be identified in the initial Action Plan Amendment and is therefore not identified here. DOH and the City of Bridgeport are committed to working together, along with local partners identified in the initial RBD process, as well as to continue the community engagement process started under RBD to study, analyze and identify and plan for a pilot project that meets the requirements of the Notice.

Once the pilot project is identified, DOH must then submit a substantial Action Plan Amendment that incorporates the pilot project in order for project-related funds to be obligated.

B. Update of Unmet Need

The State of Connecticut continues to have Unmet Recovery Needs, meaning needs that have not been addressed by Federal, state, or other sources, in Fairfield and New Haven Counties.

Owner Occupied Housing

As detailed in our original Action Plan and Substantial Amendment, DOH is administering an Owner Occupied Rehabilitation and Rebuilding program, specifically targeted to assist homeowners of 1-4 unit owner occupied properties address their rehabilitation and mitigation/elevation needs. The first phase of this program was to address unmet rehabilitation needs, either alone or in conjunction with mitigation/elevation needs. A second phase was added under the second allocation of CDBG-DR funding to address mitigation/elevation needs of those 1-4 unit owner occupied properties that had been damaged by Hurricane Sandy, but were able to address their needs through insurance proceeds, FEMA and/or SBA assistance.

We have reviewed our current application list to identify the number of households that would continue to be displaced or homes that will not be served by these programs due to insufficient funding. In order to accomplish this analysis, we made the following assumptions:

- There is remaining Unmet Need existing among homeowners in both New Haven and Fairfield County consisting of those on our current application list;
- Mitigation/elevation needs exist in both New Haven and Fairfield County consisting of those on our current application list; and,
- Cost estimates for Unmet Need were determined using the average cost of assisted or to-be-assisted homeowners in the respective counties from our database.

The Summary Table on the following page, Table 1, identifies the number of current applicants seeking assistance, either with remaining unmet rehabilitation or with unmet mitigation/elevation needs which cannot be addressed with the current funding available.

Table 1 Summary Table of Unmet Need - Owner Occupied						
		# of Households	Average Cost	Total Need	Average Assistance Other Sources (Insurance, FEMA, SBA)	Remaining Unmet Need
Fairfield County	Rehabilitation and/or Mitigation	99	$181,579	$17,976,315	$114,393	$11,324,923
New Haven County	Rehabilitation and/or Mitigation	74	$175,325	$12,974,098	$52,139	$9,115,794
				$30,950,413	$166,532	$20,440,717

Referring to Table 2 below, which was copied from Table 5 on page 22 of the CDBG-DR Substantial Amendment – Tranche 2, there were estimated to be FEMA unpaid losses and open claims, after adjustments, of $39,329,391 and $6,186,325 in Fairfield and New Haven, respectively. According to updated data provided to us by FEMA, it would appear that approximately $9,830,950 in claims has been paid out in Fairfield and $4,402,584 in claims have been paid out in New Haven counties. This would indicate a remaining unmet need, without taking into consideration mitigation/resiliency activities, $29,498,441 and $1,783,741 in remaining unmet need in these two counties.

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

Multifamily Housing

As detailed on page 53 of our original Action Plan, DOH is administering a Multifamily Rehabilitation/Rebuilding and Mitigation program, specifically targeted to low and moderate income multifamily properties with unmet need, with an emphasis on state or federal public housing. There were more than 815 units of state or federal public housing located within the 100 Year Flood Plan in Fairfield County. The total estimated need associated with the rehabilitation and mitigation of these units was in excess of $240,000,000, with an estimated unmet need of more than $140,000,000.

DOH anticipated using significant state and other resources to leverage these activities, and thus only allocated $26,000,000 of the available CDBG-DR funding to address these needs. These other resources include state taxable and tax exempt bond financing, federal Low Income Housing Tax Credits (both 4% and 9% credits), as well as conventional housing financing. To date, DOH has targeted the majority of the $26,000,000 available on three separate public housing replacement activities as identified in Table 3. As this table shows, there is significant remaining unmet need relative to the rehabilitation or replacement of these units.

Table 3
Summary Table of Unmet Need -Multifamily

Fairfield County		# of Units	Total Development Cost	CDBG-DR Assistance	Estimated Assistance Other Sources (DOH/LIHTC/ Other)	Remaining Unmet Need
Stamford	Summer Place (fka: Ed Czescik Homes)	48	$14,525,240	$6,400,000	$8,125,240	$0
Stamford	Scattered Site (Phase 2 of Ed Czescik Replacement)	2	$200,000	$0	$100,000	$100,000
Bridgeport	Crescent Corner (Phase 1 of Marina Village)	93	$32,163,563	$6,975,000	$25,188,563	$0
Bridgeport	Marina Village 2	84	$28,500,000	$0	$16,500,000	$12,000,000
Bridgeport	Marina Village 3	84	$28,500,000	$0	$12,500,000	$16,000,000
Bridgeport	Marina Village 4	102	$35,500,000	$0	$22,000,000	$13,500,000
Norwalk	Washington Village - Phase 1	80	$32,632,384	$9,855,000	$22,777,384	$0
Norwalk	Washington Village - Phase 2	85	$34,500,000	$0	$15,000,000	$19,500,000
Norwalk	Washington Village - Phase 3	108	$36,250,000	$0	$17,500,000	$18,750,000
Stratford	Meadowview Manor	100	$32,307,600	$0	$32,307,600	$0
	Elm Terrace	50	$16,153,800	$0	$8,000,000	$8,153,800
	Robert F. Kennedy Apartments	75	$24,230,700	$0	$12,000,000	$12,230,700
New Haven County						
Meriden	Mills Memorial Housing	140	$43,000,000	$0	$18,000,000	$25,000,000
			$358,463,287	$23,230,000	$209,998,787	$125,234,500

Summary of Unmet Housing Need

As demonstrated above, there is significant unmet need relative to housing in the most impacted and distressed counties, Fairfield and New Haven, in excess of $145,000,000.

Infrastructure

As detailed in the CDBG-DR Substantial Amendment – Tranche 2, DOH is administering an Infrastructure and Infrastructure-related Program, specifically targeted to provide assistance to known infrastructure and infrastructure-related activities that have not been addressed through available resources. In response to a DOH request for information regarding infrastructure and infrastructure-related needs, other state agencies and local governments identified more than forty projects with needs totaling approximately $157.4 million. Of these projects, thirty (30) of these projects have received funding of approximately $36 million.

The State intends to seek additional funding through other sources to address these remaining unmet infrastructure and infrastructure-related projects.

C. Allocation of CDGB-DR Funds

Tranche 1 and Tranche 2 Recap

Table 1 shows the activities and funding levels for Tranche 1 and Tranche 2 of CDBG-DR.

Table 1 CDBG-DR Tranche 1 and Tranche 2 Activities and Funding			
Activity	**Unmet Need in All Eligible Areas**	**Tranche 1 Allocation**	**Tranche 2 Allocation**
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	$111,500,000	$33,000,000	$4,200,000
Owner-Occupied Reimbursement (Completed Rehab and Mitigation) 0 – 80% AMI – Priority One 80 – 120 % AMI – Priority Two 120 - 150% AMI – Priority Three		0	$11,200,000
Owner-Occupied Mitigation 0 – 100% AMI – Grant 100 – 120 % AMI - $30k grant/referral to Shoreline RF 120 - 150% AMI – $15k grant/referral to Shoreup CT		0	$10,000,000
Multi-family (Rehab & New Construction)	$147,907,500	$26,000,000	0
Infrastructure/Public Facilities	$151,600,000	$6,200,000	$30,000,000
Evidence-based Strategies	NA	0	$300,000
Economic Revitalization	$10,797,888	$1,000,000	0
Mitigation	$27,758,056	0	0
Administration	NA	$3,591,000	$3,300,000
Planning	$25,000,000	$2,029,000	$7,000,000
TOTAL	**$474,563,444**	**$71,820,000**	**$66,000,000**

Administration of the Program

DOH administers the Tranche 1 and Tranche 2 Funds through selective application processes wherever feasible. The project eligibility requirements implemented by DOH include the following (though not all requirements will apply to all types of projects):

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

Owner-Occupied Housing (Unmet Rehabilitation & Mitigation)

Grant Caps

- The total grant minimum including mitigation is $10,000.
- The total grant maximum including mitigation is $150,000.
- Waivers of the grant cap for low income families may be granted on a case-by-case basis.

Funding Priorities

- Priority 1: Assist households whose income is less than 80% of the AMI and who are also currently displaced from their home.
- Priority 2: Assist those whose income is less than 80% of the AMI.
- Priority 3: Assist households whose income is between 80% and 120% of the AMI and who are also currently displaced from their home.
- Priority 4: Assist those whose income is 80% to 120%.
- Priority 5: Assist households whose income is above 120% of the AMI and who are also currently displaced from their home.
- Priority 6: Assist those whose income is above 120% of AMI depending on funding availability.

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

Grant Caps

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

Funding Priorities

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

Owner-Occupied Mitigation (Mitigation Only activities)

Grant Caps

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

Funding Priorities

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

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

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

The Multifamily CDBG-DR assistance programs provide funding for necessary expenses related to disaster relief, long-term recovery and restoration of multifamily housing impacted as a result of Superstorm Sandy. This assistance targets eligible Low to Moderate Income (LMI) multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by Superstorm Sandy and depending upon state and/or federal requirements, located either within or outside the 100 or 500 year floodplain in any eligible community located in the four designated counties with emphasis on properties located in Fairfield and New Haven counties.

Grant Caps

1. Scattered Site Rehabilitation and Rebuilding Program (SSRR) (non-owner occupied)
   - The total grant minimum including mitigation, as indicated above is $10,000.
   - The total grant maximum including mitigation, as indicated above is $150,000.

2. Multifamily Rehabilitation Program (Outside the floodplain) (MFRO)
   - The minimum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $5,000.
   - The maximum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $75,000.

3. Multifamily Rehabilitation/Rebuilding & Mitigation Program (Inside the floodplain) (RRMI)
   - The minimum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $5,000.
   - The maximum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $75,000.

Funding Priorities

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

- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible when undertaken with rehabilitation to correct the damage conditions caused by the disaster.
- Projects involving the relocation of existing multifamily housing that serves LMI persons and is located within the 100 year floodplain in New Haven and Fairfield Counties.
- Projects involving the repair and rehabilitation of LMI housing located outside the 100 year floodplain in New Haven and Fairfield Counties.

Economic Revitalization:

Grant Caps

- There is no minimum grant requirement.
- The maximum grant for economic revitalization is $50,000 from CDBG-DR and $50,000 from the State Small Business Express Program per business.
- There are also loan funds available in accordance with the current State Small Business Express Program guidelines.

Funding Priorities

Any small business in one of the four eligible counties is eligible to participate.

Infrastructure/Infrastructure-related Projects

Grant Caps

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

Funding Priorities

- Restoration or replacement of infrastructure damaged as a result of Superstorm Sandy, especially for projects that are vital for the redevelopment of properties damaged as a result of Superstorm Sandy.

- Resilience/mitigation activities related to water or wastewater systems.
- Resilience/mitigation activities related to streets and/or drainage systems.
- Resilience/mitigation of transportation systems and controls.
- Resilience/mitigation of energy systems.
- Other mitigation activities.

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

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

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

Evidence-based Strategies

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

DOH, in coordination with the Department of Mental Health and Addiction Services (DMHAS), intends to respond to a Request for Proposals from the Corporation for Supportive Housing in pursuit of a grant up to $150,000 in support of this activity. If successful in receiving this grant, DOH and DMHAS will leverage these two funding sources to determine if "pay for success" can be a working model in Connecticut.

Planning for Mitigation/Resiliency

The State recognizes that future storms may severely damage homes, businesses, infrastructure and public facilities in municipalities throughout Connecticut. It is essential that our infrastructure and public facilities be hardened in anticipation of these events. Based on input from other state agencies and local governments, DOH continues to support a coordinated effort to promote consistency in resiliency and mitigation planning across State agencies and local governments, training and capacity building initiatives to promote preparedness, hazard mitigation, and future disaster resilience at the local, regional and state level, and specific studies to coordinated, cost effective long-term resiliency and mitigation investments, including the development of "green" initiatives.

Also, in accordance with the federal guidelines, the State will utilize a portion of these Planning funds to offset the costs incurred to develop the proposed programs and activities through which CDBG-DR funds will be administered.

Administration

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

In addition, there are long term compliance and monitoring requirements associated with CDBG-DR funds that will require oversight by the State well beyond the period during which program funds may be expended. Specifically, all program funds must be committed to specific projects on or before June 1, 2018. As required in the Federal Notice, all program funds must be fully expended, with all projects completed before March 19, 2019. However, some projects will require compliance monitoring by the State for up to fifteen years beyond 2019. In order to effectively administer CDBG-DR funds, consistent with these federal requirements, and to ensure that the necessary safe guards are provided, and monitoring processes and procedures

are established and followed, the State intends to utilize the full allotment of administrative funds allowed under the Federal Register Notice. However, prior to the commitment date noted above, the State can request that a portion of these funds be reallocated to program activity as necessary and DOH intends to use these funds for such purpose, if appropriate.

Future Adjustments in Distributions

In accordance with federal guidelines, any proposed alterations or modifications in these distributions in excess of 25% of the original distribution require the preparation and submission of an amended Substantial Amendment.

Status of Tranche 1 and Tranche 2 Activity

In accordance with federal guidelines, quarterly status reports on all eligible program activities are posted on the DOH website. The most recent quarterly report may be accessed at the Hurricane Sandy webpage, which can be accessed at this link.

D. Proposed Distribution of CDGB-DR Funds from Tranche 3

Table 2 shows the activities and funding levels that are being proposed for Tranche 3 of CDBG-DR, as well as the anticipated distribution of funding for the Resilient Bridgeport RBD funds.

Activity	Tranche 3 Distribution	Resilient Bridgeport RBD
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	$6,886,050	0
Multi-family (Rehab & New Construction)	$3,000,000	0
Infrastructure/Infrastructure-related	$1,000,000	$8,000,000
Administration (5%)	$572,950	$ 500,000
Planning	0	$1,500,000
TOTAL	**$11,459,000**	**$10,000,000**

Administration of the Tranche 3 Funds

DOH intends to administer the Tranche 3 Funds through the existing processes and programs adopted and implemented under Tranche 1 and Tranche 2, including the use of selective application processes wherever feasible. The project eligibility requirements proposed to be implemented by DOH include the following (though not all requirements will apply to all types of projects):

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

Owner-Occupied Housing (Unmet Rehabilitation & Mitigation)

As noted in the table above, the majority of the Tranche 3 funds will be used to address remaining unmet need under the Owner-Occupied Housing program. Rising construction costs, including and in particular the cost of elevation and other resiliency measures, have lead to increasing unmet need, especially for those families in the low and moderate income range. These additional funds will allow DOH to continue to address the needs of applicants at all income ranges, consistent with the federal programs requirements.

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

Due to the multiple-phased complex financial nature of large scale multi-family housing rehabilitation and new construction, DOH has identified the need for additional funds to support this activity. DOH continues to require significant leveraging requirements associated with these large scale projects, including but not limited to the use of other federal funding sources such as the Low Income Housing Tax Credit program, Federal Home Loan Bank financing and federal Historic Tax Credits. These additional funds will allow DOH to continue to move additional phases of these large scale developments to occupancy.

Infrastructure/Infrastructure-related Projects

In order to support the continued resiliency of some of our most severely impacted municipalities, additional funds are being proposed to address infrastructure and infrastructure-related activities. In coordination with other resiliency efforts, such as the federal Choice Neighborhoods program, the National Disaster Resiliency Competition, the 100 Resilient Cities Initiative and FEMA's Hazard Mitigation Grant program, these funds are intended to allow us to leverage these additional resources and contribute to the resiliency needs of our State's municipal infrastructure.

Administration

Total administrative fees for CDBG-DR are set by HUD at 5% of the total allocation. DOH continues to make the most of its limited administrative funding, including the use of some of its administrative funding available to support the State's application under the National Disaster

Resilience Competition. With coordination by the Office of Policy and Management and in conjunction with the Departments of Public Health, Transportation, Energy and Environmental Protection, Emergency Management and Public Safety and host of municipal and local partners, DOH intends to apply for these federal funds as part of HUD's competitive process.

E. Administration of the Resilient Bridgeport Rebuild by Design Funds

Although the Resilient Bridgeport proposal was not selected as a winning proposal, the $10,000,000 in CDBG-DR funds are being allocated by HUD to reduce flood risk for the most vulnerable public housing stock in the city and to leverage other funding. HUD recognizes that additional planning is required to reassess and re-scope one or more elements of the proposal to identify a pilot project that can be implemented and that the forthcoming project may require greater deviation from the proposal as submitted relative to that of the winning proposals. This Funding is to be used for continued study, analysis, planning, and community engagement as well as for design, engineering, and construction of a to-be-identified pilot project.

DOH and the City of Bridgeport are committed to working together, along with local partners identified in the initial RBD process to identify a pilot project which will address the resiliency needs of the City's South End/Black Rock Harbor area, as well as to continue the community engagement process started under RBD to study, analyze and identify and plan for the broader resiliency needs of the City.

Once a pilot project has been identified, DOH will submit a substantial Action Plan Amendment to HUD that identifies the project-related funds to be obligated. These are currently identified as Infrastructure/Infrastructure-related in Table 2 above.

Having been selected by HUD to participate in the Rebuild by Design process, Bridgeport was paired with a team of engineering, architecture, urban design, and stakeholder engagement consultants from the United States Gulf Coast, Connecticut, and the Netherlands. From November, 2013 through March, 2014, this team worked with city staff, state and regional agency representatives, and civic, private, and neighborhood stakeholders to identify vulnerabilities in the city and to devise strategies that would make Bridgeport and its

neighborhoods more resilient to future storm impacts. The resulting proposal included ten projects that could be implemented in the near term and five studies to identify longer term investments. The projects included a combination of coastal naturalization (wetland restoration, off-shore reef construction, green infrastructure, etc…) and fortification (flood walls, berms, elevated infrastructure, etc…) that would collectively buffer the city's hardest hit neighborhoods from future storm impacts. While the projects were focused on Black Rock, the South End, Downtown, and the Pequonnock River corridor, the initiatives would provide important lessons for how similar strategies could be utilized in other city neighborhoods and in other municipalities in the state and the region. Following a presentation of these projects and studies to a jury chaired by the Secretary of HUD, HUD determined that the initiatives needed further development before implementation could be justified. Resilient Bridgeport was awarded the $10 million as a component of the State's Tranche 3 allocation to enable the concepts included in the proposal to be further refined and to enable implementation of a pilot project identified through that planning and design process.

Planning

In order to accomplish the further planning identified as necessary by HUD, it is anticipated that up to $1,500,000 of the funds available will be utilized for further neighborhood-scale planning. These funds will be used for data collection, analysis, general planning and community engagement, as well as design, and engineering and environmental impact analysis.

Since HUD announced the award to Resilient Bridgeport, city staff and consultants have worked to hone the scope of the initiative and identify the few key projects that justify further exploration and investment at this stage. Focusing on the South End generally and the Marina Village public housing complex and the Seaside Village co-op neighborhood in particular, the planning process will identify the combination of naturalization and fortification measures best suited to protect these developments and surrounding housing and businesses from future storm impact. It is anticipated that a linear fortification system consisting of a combination of flood walls, landscaped berms, elevated roadways, and integrated foundations/sites of private developments will be identified through this planning process. It will protect areas within the South End from both chronic and acute flooding. It is anticipated that this fortification system will

be complemented by a naturalization/green infrastructure strategy that will utilize some lands within the neighborhood for the purposes of naturally managing storm impacts. Together, these systems will limit flooding, protect existing and future development, restore natural processes, and enhance quality of life for residents of the South End and adjacent neighborhoods. Additionally, the city will advance the Downtown Design Center concept proposed in Resilient Bridgeport to bring together faculty, staff, and students from area universities in a collaborative setting to foster interdisciplinary and inter-institutional teams' utilization of Bridgeport as a living laboratory for identifying coastal resiliency strategies to the benefit of Connecticut's coastal communities and beyond.

The planning stage of the project will focus first on identifying the preferred form and route of the flood protection measures and preferred location of naturalization measures. Following this, the system will move into preliminary design, modeling, and engineering. Once the design is honed, a pilot section will be identified for implementation. A future substantial amendment will be submitted following the identification of the pilot project for implementation.

Administration

As previously noted, total administrative fees for CDBG-DR are set by HUD at 5% of the total allocation. Although DOH will be administering and ultimately responsible for the management and disbursement of funds under this portion of Tranche 3, DOH intends to absorb the cost of this administrative activity and make these administrative funds available to the City of Bridgeport to offset some of their administrative burden and staff costs which will be necessary for the successful implementation of this component of Tranche 3.

Infrastructure/Infrastructure-related Projects

These funds are currently a place holder for the pilot project will be identified through the local planning process. As required by the Notice, another Substantial Amendment will be prepared and vetted through the required Citizen Participation process.

F. State Allocation Process

In accordance with Section 4-28b of the Connecticut General Statutes, an Allocation Plan was made available to the Legislature for its consideration. The draft Allocation Plan was incorporated into this Substantial Amendment to the Action Plan Tranche 3, which was made publicly available for a thirty-day public comment period beginning on or about January 8th, 2015. A legal notice requesting comment on the Substantial Amendment was published in three newspapers, including one in Spanish, on or before January 8th, 2015. A copy of the legal notice and the Substantial Amendment was sent to all municipalities and public housing authorities, as well as the Community Partners identified in the State's Consolidated Plan for Housing and Community Development. The legal notice and Substantial Amendment was posted to the Hurricane Sandy designated page on the DOH website for the full comment period.

In accordance with the Notice, the Substantial Amendment, including the approved Allocation Plan, will be provided to HUD on or before February 23rd, 2015. HUD then has sixty (60) days to review either approve or recommend revisions to the Substantial Amendment.

RBD Substantial Amendment

Upon identification of the pilot project(s) under the Resilient Bridgeport RBD funding, and in accordance with Section 4-28b of the Connecticut General Statutes, a revised Allocation Plan will be made available to Legislature for its consideration. That revised Allocation Plan will provide detail on the community engagement process, as well as the planning process used to identify the pilot project(s). It will further detail the proposed allocation of the remaining Resilient Bridgeport RBD funding.

That information will be used to prepare a federally required amended Substantial Amendment to the Action Plan Tranche 3, which will be made publicly available in accordance with the Citizen Participation requirements of the Notice.

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

The State's CDBG-DR Substantial Amendment planning process has been coordinated through a collaborative effort of local, state, federal and private sector partners. The State has offered several opportunities for public notice and comment on this Substantial Amendment including:

- Holding meetings and/or teleconferences with the mayors and first selectman of affected communities as part of the Long Term Recovery Working Group;
- Attending monthly meetings of CONN-NAHRO (housing authorities);
- Notice of a seven-day public comment period to solicit input in the development of the Substantial Amendment was posted from December 11, 2014 through December 18, 2014;
- Holding a Public Hearing on December 18th, 2014 in the City of Bridgeport in coordination with the continued community involvement relative to Resilient Bridgeport;
- Submitting an Allocation Plan to the Connecticut Legislature for the distribution of the third tranche of funding of $11.459M and an update of the first and second tranche of funding in the amount of $137.82M;
- Posting the full Substantial Amendment to the Action Plan Tranche 3 on the Department of Housing web site on January 8, 2015 for 30 days of public comment;
- Holding a Legislative Public Hearing on the full Amendment, with an emphasis on the Allocation of funds.

Pursuant to Section 4-28b of the Connecticut General Statutes, the Joint Standing Committees of Connecticut's General Assembly that have cognizance, are required to meet to review Community Development Block Grant Allocation Plans. In preparation for this meeting, a draft Allocation Plan was submitted to the General Assembly on December 23, 2014.

In addition, Resilient Bridgeport was created through a robust public participatory process that spanned the Rebuild by Design timeframe in 2013 and 2014. City staff worked to continue the stakeholder engagement process since the conclusion of the competition in the spring of 2014 so that there was not a major gap in the public's awareness and involvement in the initiative's progress. The following lists and describes all significant public meetings at which Resilient Bridgeport was discussed since the conclusion of the Rebuild by Design competition.

July 10, 2014 South End Neighborhood Revitalization Zone (NRZ) Meeting

John J. Cox Student Center

University of Bridgeport
244 University Ave., Bridgeport, CT 06604

Office of Planning and Economic Development (OPED) Director David Kooris provided an overview of the Rebuild by Design project to the South End neighborhood. Director Kooris informed the community that HUD has recently awarded $10 million in federal funds as part of Rebuild by Design to promote disaster resiliency in the South End neighborhood. The community members were interested to know more about the types of projects that could be funded and the project schedules. Community involvement process was widely discussed in various phases of project planning and implementation.

September 11, 2014 – South End NRZ Leadership Meeting

Margaret E. Morton Government Center
999 Broad St., 2nd Floor
Bridgeport, CT 06604

OPED Director David Kooris and Planning Director Parag Agrawal met with the President and the Secretary of the South End NRZ and briefed them about the City's efforts to incorporate flood resiliency standards into South End's development standards and the proposed rezonings. South End NRZ members applauded the city's efforts and invited the staff to attend the NRZ meeting.

September 11, 2014 – South End NRZ Meeting

John J. Cox Student Center
University of Bridgeport
244 University Ave., Bridgeport, CT 06604

Planning Director Parag Agrawal presented the proposed zoning changes and the new flood resiliency standards at the South End NRZ meeting. The community members were interested to know more about how the new flood resiliency standards would impact the existing homes and their impact on neighborhood character. They asked the City staff to put together a handbook that discusses various retrofitting techniques. The community supported the proposed changes, but requested a special NRZ meeting to further discuss the rezoning and the new standards.

September 25, 2014 – Special South End NRZ Meeting

John J. Cox Student Center
University of Bridgeport
244 University Ave., Bridgeport, CT 06604

Planning Director Parag Agrawal presented the proposed zoning changes and the new flood resiliency standards at the special South End NRZ meeting. Project handouts discussing the proposed changes were made available. The community was interested to know more about how the new flood resiliency standards could mitigate the stormwater management issues in the neighborhood and the impact on flood insurance premiums. The neighborhood residents would like to see a program that could help them retrofit their existing properties to meet the flood resistant construction required. Whether Rebuild by Design funds could be used to launch such a program was also discussed.

October 9, 2014 – South End NRZ Meeting

John J. Cox Student Center
University of Bridgeport
244 University Ave., Bridgeport, CT 06604

Planning Department Staff presented the updated South End NRZ Plan to the community. As nearly 70 percent of South End neighborhood is in 100 year flood plain, the Plan focuses on coastal resiliency and sustainability. The Staff discussed number of disaster resiliency strategies like launching green street design, tree planting programs and incorporating floodplain development standards. The community members were interested to know what type of projects could be funded through Rebuild by Design funds.

December 18, 2014 – Tranche 3 Resilient Bridgeport Workshop (and Public Hearing)

John J. Cox Student Center
University of Bridgeport
244 University Ave., Bridgeport, CT 06604

OPED Director Kooris joined by Planning Department staff, HUD staff (Hartford and DC offices), CT DOH staff, and Rebuild by Design staff presented progress achieved since the submission of the Resilient Bridgeport proposal including the three focal projects described above. Following the presentation and a discussion, stakeholders were divided into tables were

facilitated discussions helped staff identify areas of the South End that need to be prioritize for flood mitigation as components of the initiatives fortification and naturalization strategies.

As demonstrated by the meetings held over the last seven months, the city has a strong commitment to public participation and stakeholder engagement and will continue a comparable process through the planning stage of this initiative. It is anticipated that, with consultant support, there will be two workshops and three public meetings during the planning stage to garner input in the design as it develops. In addition, city staff will provides monthly updates and opportunities for input at the regularly scheduled meetings of the South End Neighborhood Revitalization Zone.

The following chart lists the South End NZ meeting dates for the next 12 months and also sets a timeframe for future workshops and public meetings during the planning stage to seek community input:

Months	**NRZ Meetings**	**Workshops/ Public Meetings**
January	January 8	
February	February 12	
March	March 12	Public Workshop
April	April 9	
May	May 14	Public Meeting
June	June 11	
July	July 09	Public Workshop
August	August 13	

September	September 10	Public Meeting
October	October 8	
November	November 12	Public Meeting
December	December 10	

The draft Substantial Amendment to the Action Plan for Tranche 3 was made available for a 30 day public comment period, starting on January 8, 2015 and ending on February 8, 2015. A Legal Notice requesting comment on the draft Amendment to the Action Plan was published in two newspapers, including one in Spanish on January 8, 2015. A copy of the legal notice was sent to all the municipalities and public housing authorities, applicable tribes, DOH's Community Partners, and the members of the State Legislature's Appropriations Committee, Commerce Committee, Planning and Development Committee, and the Chairs of the Housing Sub-Committee. The legal notice and the Substantial Amendment to the Action Plan were posted to the designated Hurricane Sandy page on the DOH website for the 30 day comment period. Comments were accepted in written or electronic versions. Hard copies of documents were also made available upon request. Limited English Proficiency (LEP) is addressed by the availability of a Google translation browser button.

Summary of Comments Received and Response

Pre-Draft Public Hearing, December 18, 2014

A copy of the transcript is attached as Exhibit C-1.

1. Various comments were made relative to specific projects or activities to be undertaken through the RBD process in Bridgeport.
   Response: Commenters were informed that specific projects will not be identified at this time, but that their participation in the community planning and decision-making process will be appreciated.

Public Hearing, February, 4, 2015

A copy of the transcript is attached as Exhibit C-2. No one other than DOH staff were present. No comments were made.

Legislative Public Hearing, February, 5, 2015

A video recording of the proceedings is available at http://ct-n.com/ondemand.asp?ID=11163. The CDBG-DR Allocation Plan was unanimously approved.

Public Comment Period

Upon completion of the 30 day comment period, only one formal written comment was submitted. A copy of that comment is attached in Exhibit B.

1. One comment was received from Rebuild By Design in support of the proposed process.
   Response: DOH appreciates the support, and intends to proceed accordingly.

Substantial Amendments to the Action Plan

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

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

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

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

received and responses will be included in the Substantial Amendment that is submitted to HUD for approval.

Non-Substantial Amendments to the Action Plan

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

Performance Reports

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

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

Citizen Complaint Procedures

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

Program Coordinator
CDBG-DR Program
Department of Housing
505 Hudson Street
Hartford, CT 06106-7106

The State will make every effort to provide a timely written response to every citizen compliant within fifteen working days of the receipt of the complaint, where practical. All citizen complaints relative to Fair Housing/ Equal Opportunity violations involving discrimination will be forwarded to the following address for disposition: Commission on Human Rights and Opportunities, 25 Sigourney Street, Hartford, CT 06106.

Limited English Proficiency

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

H. Certification of Resilience Standards

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

I. Exhibits

Exhibit A	CDBG-DR Allocation Plan – Tranche 3
Exhibit B	Legal Notices
Exhibit C	Transcripts
Exhibit D	Public Comments Received

Exhibit A

Community Development Block Grant

Disaster Recovery Program

Allocation Plan

Substantial Amendment for Tranche 3

DEPARTMENT OF HOUSING

Evonne M. Klein, Commissioner

December 2014

Table of Contents

A. BACKGROUND 1

B. OVERVIEW OF ALLOCATION PLAN 4

C. ALLOCATION OF CDGB-DR FUNDS 7

D. PROPOSED ALLOCATION OF CDGB-DR FUNDS FROM TRANCHE 3 14

E. ADMINISTRATION OF THE RESILIENT BRIDGEPORT REBUILD BY DESIGN FUNDS 16

F. STATE ALLOCATION PROCESS 17

A. Background

On Monday, October 29, 2012 Hurricane Sandy made landfall near Atlantic City, New Jersey, as a post-tropical cyclone. The storm created a significant tidal surge from the Mid-Atlantic region to New England. After landfall, Sandy headed north by northwest bringing high winds, rain, and storm surge to coastal areas of Connecticut, causing widespread wind damage, flooding, and power outages. On Saturday, October 27, in advance of Sandy's forecasted impact on Connecticut, Governor Malloy signed a declaration of emergency and the following day the Governor requested, and President Obama approved, a declaration of a pre-landfall emergency.

The size and scope of the storm has been attributed to a convergence of weather systems. As the hurricane pivoted toward land, it merged with a winter storm from the west and cold air moving south from the Arctic. The hybrid storm - with both tropical and extra-tropical characteristics - brought high winds and coastal flooding to southern New England. High wind warnings and coastal flood warnings were issued by the National Weather Service, with storm surge prediction in the range of 6 to 11 feet above astronomic high tide, with 6 to 10 foot waves on top of the surge.

In response to the extraordinary destruction caused by Hurricane Sandy, Congress passed and the President signed into law The Disaster Relief Appropriations Act; also known as Public Law 113-2 (the "Act"), which, among other things, appropriated approximately $60 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act. A significant portion of those funds was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG-DR Program") to be administered by the United States Department of Housing and Urban Development ("HUD").

Governor Dannel P. Malloy has designated the Connecticut Department of Housing ("DOH") the principal state agency for the allocation and administration of Funding.

As explained in more detail below, the State of Connecticut, through DOH, has received two previous allocations of these federal block grant funds, Tranche 1 - $71,820,000 and Tranche 2 - $66,000,000, totaling $137,820,000. This third allocation (Tranche 3) appears to be the final

allocation of CDBG-DR funds to be made to the State of Connecticut, and includes a new component not previously made available.

Tranche 3 consists of $11,459,000 in CDBG-DR funds and $10,000,000 in Rebuild by Design ("RBD") funds intended to support the Resilient Bridgeport initiative, totaling $21,459,000. This Allocation Plan describes the programs and activities for which the State intends to expend the Tranche 3 funding in compliance with the federal requirements set forth in public notice released by HUD on October 16, 2014, in the Federal Register at Vol. 79, No. 200, Page 62184 entitled: "Third Allocation, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy".

In accordance with the Federal Register Notice, for both the Tranche 3 funds and the RBD funds, the State must submit a Substantial Action Plan Amendment to the Action Plan and must be expended by the State in a manner consistent with the Act and all other applicable federal and laws and regulations. As in the past, in accordance with Section 4-28b of the Connecticut General Statutes, DOH is required to submit an Allocation Plan for any federal block grants received. Therefore, we now submit the State's Tranche 3 Allocation Plan for these funds for your review and approval, which will support the Substantial Action Plan Amendment required by HUD.

This Allocation Plan provides updates on Tranche 1 and Tranche 2 funds, as well as describes the intended allocation of the Tranche 3 funds, including the RBD funds.

As with the previous two Substantial Action Plan Amendment to the Action Plan, this Substantial Amendment must also provide a description of the State's public outreach and citizen participation practices. The State is obligated to ensure that the processes, procedures, and fiscal and administrative controls it will use in the course of expending the Funding are sufficient to safeguard the Funding from waste, fraud and abuse.

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

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

The only areas in which the Tranche 3 Funding can be expended are Fairfield County, and New Haven County. This requirement is consistent with the damage and impact assessments that were reported by the Federal Emergency Management Agency ("FEMA"), the U.S. Small Business Administration ("SBA"), the Connecticut Department of Emergency Services and Public Protection division of Emergency Management and Homeland Security ("DESPP/DEMHS"), as well as municipalities within the impacted counties.

The Appropriations Act requires funds to be used only for specific disaster recovery related purposes and the State must detail their proposed use of funds, including criteria for eligibility and how the use of these funds will address disaster relief, long-term recover, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas. In addition, as set forth in the Federal Register Notice, the Funding cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of the Funding, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a "National Objective"): low- and moderate income benefit; elimination of slum and blight; and urgent need. Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of the Funding can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget. HUD has granted a number of general program waivers which have provided greater flexibility to the administration of the program. DOH will make use of these waivers whenever applicable, and reserves the right to request such additional waivers as may be appropriate and consistent with the waiver guidance provided by HUD.

B. Overview of Allocation Plan

Federal Requirements – Third Tranche and RBD

On Thursday, June 13, 2014 the Department of Housing received verbal notification from the U.S. Department of Housing and Urban Development that the State of Connecticut was scheduled to receive an additional allocation of federal funds under CDBG-DR. However, no information on the actual amount of funds to be allocated was available at that time.

In mid-October, 2014, HUD promulgated regulations that established the regulatory framework for the receipt and expenditure of the Third Allocation of CDBG-DR Program funds, all as set forth in Federal Register Notice (Vol. 79, No. 200; October 16, 2014 Page 62184) titled: "Third Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy" (the "Federal Register Notice"). Via this Notice, we became aware that Connecticut would receive an allocation of $11,459,000 under CDBG-DR. In addition, the State of Connecticut would be the recipient of an additional $10,000,000 specifically in support of the Resilient Bridgeport initiative pursued by the City of Bridgeport under the Rebuild by Design process managed by HUD.

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

To access funds grantees must submit a Substantial Amendment to their approved Action Plan.

Any Substantial Amendment submitted is subject to the following requirements:

- DOH consults with affected citizens, stakeholders, local governments and public housing authorities to determine updates to its needs assessment; in addition, grantee prepares a comprehensive risk analysis;
- DOH amends its citizen participation plan to reflect the requirement for a public hearing;
- DOH publishes a substantial amendment to its previously approved Action Plan for Disaster Recovery on the DOH Web site for no less than 30 calendar days and holds at least one public hearing to solicit public comment;
- DOH responds to public comment and submits its Substantial Amendment to HUD no later than 120 days after the effective date (February 23, 2015);
- HUD reviews the Substantial Amendment within 60 days from date of receipt and approves the Amendment according to all published criteria;
- HUD sends a Substantial Amendment approval letter, with revised grant conditions (if applicable), and an amended unsigned grant agreement to DOH.
- If the substantial Amendment is not approved, a letter will be sent identifying its deficiencies; DOH must then re-submit the Amendment within 45 days of the notification letter; and
- DOH ensures that the HUD approved Substantial Amendment is posted on its official Web site.

Use of the Third Tranche Funds

The Appropriations Act provides requires that these funds be used only for specific disaster recovery related purposes. Consistent with the Rebuilding Strategy, it is essential to build communities back stronger and more resilient. This allocation provides additional funds to Sandy-impacted grantees to support investments in resilient recovery.

In addition to specifying the amount of funds allocated to Connecticut in the third tranche ($11,459,000), the Federal Register Notice also provides an additional $10,000,000 specifically designed to support the Resilient Bridgeport initiative under the Rebuild by Design ("RBD") competition.

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Rebuild by Design (RBD) was a planning and design competition to increase resilience in the Sandy-affected region as part of recovery from the storm. HUD conducted the competition under the authority of § 105 of the America COMPETES Reauthorization Act of 2010 (15 U.S.C. 3719). Administered in partnership with philanthropic, academic, and nonprofit organizations, HUD solicited the best talents and ideas from around the world to seek innovative solutions for how communities rebuild and adapt in response to the damage from a disaster and future risks presented by natural hazards and climate change. More regarding the history of the competition can be found in the Federal Register at 78 FR 45551, published July 29, 2013, and 78 FR 52560, published August 23, 2013. The competition resulted in the selection of ten interdisciplinary design teams as finalists to participate in an in depth process. Ultimately, six proposals were announced as winning proposals in June 2014, representing an award of distinction for the respective design teams.

Although the Resilient Bridgeport proposal was not selected as a winning proposal, the $10,000,000 in CDBG-DR funds are being allocated by HUD to reduce flood risk for the most vulnerable public housing stock in the city and to leverage other funding. HUD recognizes that additional planning is required to reassess and re-scope one or more elements of the proposal to identify a pilot project that can be implemented and that the forthcoming project may require greater deviation from the proposal as submitted relative to that of the winning proposals. This Funding is to be used for continued study, analysis, planning, and community engagement as well as for design, engineering, and construction of a to-be-identified pilot project. At a minimum, the pilot project must reduce flood risk to public housing in the City's South End/Black Rock Harbor area. In order to allow the time necessary for engagement of community stakeholders regarding selection of a pilot project, the pilot project does not need to be identified in the initial Action Plan Amendment and is therefore not identified here. DOH and the City of Bridgeport are committed to working together, along with local partners identified in the initial RBD process, as well as to continue the community engagement process started under RBD to study, analyze and identify and plan for a pilot project that meets the requirements of the Notice.

Once the pilot project is identified, DOH must then submit a substantial Action Plan Amendment that incorporates the pilot project in order for project-related funds to be obligated.

C. Allocation of CDGB-DR Funds

Tranche 1 and Tranche 2 Recap

Table 1 shows the activities and funding levels for Tranche 1 and Tranche 2 of CDBG-DR.

Table 1 CDBG-DR Tranche 1 and Tranche 2 Activities and Funding			
Activity	**Unmet Need in All Eligible Areas**	**Tranche 1 Allocation**	**Tranche 2 Allocation**
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	$111,500,000	$33,000,000	$4,200,000
Owner-Occupied Reimbursement (Completed Rehab and Mitigation) 0 – 80% AMI – Priority One 80 – 120 % AMI – Priority Two 120 - 150% AMI – Priority Three		0	$11,200,000
Owner-Occupied Mitigation 0 – 100% AMI – Grant 100 – 120 % AMI - $30k grant/referral to Shoreline RF 120 - 150% AMI – $15k grant/referral to Shoreup CT		0	$10,000,000
Multi-family (Rehab & New Construction)	$147,907,500	$26,000,000	0
Infrastructure/Public Facilities	$151,600,000	$6,200,000	$30,000,000
Evidence-based Strategies	NA	0	$300,000
Economic Revitalization	$10,797,888	$1,000,000	0
Mitigation	$27,758,056	0	0
Administration	NA	$3,591,000	$3,300,000
Planning	$25,000,000	$2,029,000	$7,000,000
TOTAL	**$299,535,788**	**$71,820,000**	**$66,000,000**

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Administration of the Program

DOH administers the Tranche 1 and Tranche 2 Funds through selective application processes wherever feasible. The project eligibility requirements implemented by DOH include the following (though not all requirements will apply to all types of projects):

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

Owner-Occupied Housing (Unmet Rehabilitation & Mitigation)

Grant Caps

- The total grant minimum including mitigation is $10,000.
- The total grant maximum including mitigation is $150,000.
- Waivers of the grant cap for low income families may be granted on a case-by-case basis.

Funding Priorities

- Priority 1: Assist households whose income is less than 80% of the AMI and who are also currently displaced from their home.
- Priority 2: Assist those whose income is less than 80% of the AMI.
- Priority 3: Assist households whose income is between 80% and 120% of the AMI and who are also currently displaced from their home.
- Priority 4: Assist those whose income is 80% to 120%.
- Priority 5: Assist households whose income is above 120% of the AMI and who are also currently displaced from their home.
- Priority 6: Assist those whose income is above 120% of AMI depending on funding availability.

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

Grant Caps

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

Funding Priorities

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

Owner-Occupied Mitigation (Mitigation Only activities)

Grant Caps

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

Funding Priorities

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

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

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

The Multifamily CDBG-DR assistance programs provide funding for necessary expenses related to disaster relief, long-term recovery and restoration of multifamily housing impacted as a result of Superstorm Sandy. This assistance targets eligible Low to Moderate Income (LMI) multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by Superstorm Sandy and

depending upon state and/or federal requirements, located either within or outside the 100 or 500 year floodplain in any eligible community located in the four designated counties with emphasis on properties located in Fairfield and New Haven counties.

Grant Caps

1. Scattered Site Rehabilitation and Rebuilding Program (SSRR) (non-owner occupied)
   - The total grant minimum including mitigation, as indicated above is $10,000.
   - The total grant maximum including mitigation, as indicated above is $150,000.

2. Multifamily Rehabilitation Program (Outside the floodplain) (MFRO)
   - The minimum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $5,000.
   - The maximum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $75,000.

3. Multifamily Rehabilitation/Rebuilding & Mitigation Program (Inside the floodplain) (RRMI)
   - The minimum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $5,000.
   - The maximum grant allowed for rehabilitation, reconstruction and/or mitigation per unit is $75,000.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 80% of the Funding be spent in Fairfield and New Haven Counties;
- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible when undertaken with rehabilitation to correct the damage conditions caused by the disaster.
- Projects involving the relocation of existing multifamily housing that serves LMI persons and is located within the 100 year floodplain in New Haven and Fairfield Counties.

- Projects involving the repair and rehabilitation of LMI housing located outside the 100 year floodplain in New Haven and Fairfield Counties.

Economic Revitalization:

Grant Caps

- There is no minimum grant requirement.
- The maximum grant for economic revitalization is $50,000 from CDBG-DR and $50,000 from the State Small Business Express Program per business.
- There are also loan funds available in accordance with the current State Small Business Express Program guidelines.

Funding Priorities

Any small business in one of the four eligible counties is eligible to participate.

Infrastructure/Infrastructure-related Projects

Grant Caps

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

Funding Priorities

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

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

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

1. Regional climate change has resulted in a sudden and unexpected need to address these activities;
2. Failure to take on these activities would result in an immediate or future threat to the health and welfare of the community;

3. As previously noted, all potential infrastructure or infrastructure-related projects must have been identified on or before the 18 month anniversary of Superstorm Sandy; and
4. There are currently no other funds available to carry out these activities.

Evidence-based Strategies

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

There has not been any activity under this initiative as of yet.

Planning for Mitigation/Resiliency

The State recognizes that future storms may severely damage homes, businesses, infrastructure and public facilities in municipalities throughout Connecticut. It is essential that our infrastructure and public facilities be hardened in anticipation of these events. Based on input from other state agencies and local governments, DOH continues to support a coordinated effort to promote consistency in resiliency and mitigation planning across State agencies and local governments, training and capacity building initiatives to promote preparedness, hazard mitigation, and future disaster resilience at the local, regional and state level, and specific studies to coordinated, cost effective long-term resiliency and mitigation investments, including the development of "green" initiatives.

Also, in accordance with the federal guidelines, the State will utilize a portion of these Planning funds to offset the costs incurred to develop the proposed programs and activities through which the Funding will be administered.

Administration

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

In addition, there are long term compliance and monitoring requirements associated with the Funding that will require oversight by the State well beyond the period during which program

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

Future Adjustments in Allocations

In accordance with federal guidelines, any proposed alterations or modifications in these allocations in excess of 25% of the original allocation require the preparation and submission of an amended Substantial Amendment.

Status of Tranche 1 and Tranche 2 Activity

In accordance with federal guidelines, quarterly status reports on all eligible program activities are posted on the DOH website. The most recent quarterly report may be accessed at the Hurricane Sandy webpage, which can be accessed at this link.

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D. Proposed Allocation of CDGB-DR Funds from Tranche 3

Table 2 shows the activities and funding levels that are being proposed for Tranche 3 of CDBG-DR, as well as the anticipated distribution of funding for the Resilient Bridgeport RBD funds.

Activity	Tranche 3 Allocation	Resilient Bridgeport RBD
Owner-Occupied Housing (Unmet Rehabilitation Need and Mitigation)	$6,886,050	0
Multi-family (Rehab & New Construction)	$3,000,000	0
Infrastructure/Infrastructure-related	$1,000,000	$8,000,000
Administration (5%)	$572,950	$ 500,000
Planning	0	$1,500,000
TOTAL	**$11,459,000**	**$10,000,000**

Administration of the Tranche 3 Funds

DOH intends to administer the Tranche 3 Funds through the existing processes and programs adopted and implemented under Tranche 1 and Tranche 2, including the use of selective application processes wherever feasible. The project eligibility requirements proposed to be implemented by DOH include the following (though not all requirements will apply to all types of projects):

- Applicants must be "Eligible Applicants" as defined by HUD program regulations as modified by the Federal Register Notice;
- Proposed activity must be an "Eligible Activity" as defined by HUD program regulations as modified by the Federal Register Notice;
- Projects much meet at least one National Objective and such national Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Action Plan must be demonstrated;
- Fair Housing and Equal Opportunity Compliance must be evidenced by a Fair Housing Action Plan that complies with DOH's guidelines/policies; and

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- Applicants must be in compliance with all existing assistance agreements with DOH and cannot be in default under any CHFA or HUD-administered program.

Owner-Occupied Housing (Unmet Rehabilitation & Mitigation)

As noted in Table 2, the majority of the Tranche 3 funds will be used to address remaining unmet need under the Owner Occupied Housing program. Rising construction costs, including and in particular the cost of elevation and other resiliency measures, have lead to increasing unmet need, especially for those families in the low and moderate income range. These additional funds will allow DOH to continue to address the needs of applicants at all income ranges, consistent with the federal programs requirements.

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

Due to the multiple-phased complex financial nature of large scale multi-family housing rehabilitation and new construction, DOH has identified the need for additional funds to support this activity. DOH continues to require significant leveraging requirements associated with these large scale projects, including but not limited to the use of other federal funding sources such as the Low Income Housing Tax Credit program, Federal Home Loan Bank financing and federal Historic Tax Credits. These additional funds will allow DOH to continue to move additional phases of these large scale developments to occupancy.

Infrastructure/Infrastructure-related Projects

In order to support the continued resiliency of some of our most severely impacted municipalities, additional funds are being proposed to address infrastructure and infrastructure-related activities. In coordination with other resiliency efforts, such as the federal Choice Neighborhoods program, the National Disaster Resiliency Competition, the 100 Resilient Cities Initiative and FEMA's Hazard Mitigation Grant program, these funds are intended to allow us to leverage these additional resources and contribute to the resiliency needs of our State's municipal infrastructure.

Administration

Total administrative fees for CDBG-DR are set by HUD at 5% of the total allocation. DOH continues to make the most of its limited administrative funding, including the use of some of its administrative funding available to support the State's application under the National Disaster Resilience Competition. With coordination by the Office of Policy and Management and in conjunction with the Departments of Public Health, Transportation, Energy and Environmental Protection, Emergency Management and Public Safety and host of municipal and local partners, DOH intends to apply for these federal funds as part of HUD's competitive process.

E. Administration of the Resilient Bridgeport Rebuild by Design Funds

Although the Resilient Bridgeport proposal was not selected as a winning proposal, the $10,000,000 in CDBG-DR funds are being allocated by HUD to reduce flood risk for the most vulnerable public housing stock in the city and to leverage other funding. HUD recognizes that additional planning is required to reassess and re-scope one or more elements of the proposal to identify a pilot project that can be implemented and that the forthcoming project may require greater deviation from the proposal as submitted relative to that of the winning proposals. This Funding is to be used for continued study, analysis, planning, and community engagement as well as for design, engineering, and construction of a to-be-identified pilot project.

DOH and the City of Bridgeport are committed to working together, along with local partners identified in the initial RBD process to identify a pilot project which will address the resiliency needs of the City's South End/Black Rock Harbor area, as well as to continue the community engagement process started under RBD to study, analyze and identify and plan for the broader resiliency needs of the City.

Once a pilot project has been identified, DOH will submit a substantial Action Plan Amendment to HUD that identifies the project-related funds to be obligated. These are currently identified as Infrastructure/Infrastructure-related in Table 2 above.

Planning

As specified in the Notice, and confirmed via teleconference with HUD staff, HUD recognizes that additional planning is required to reassess and re-scope one or more of the elements of the Resilient Bridgeport proposal in order to identify a pilot project that can be implemented. It is anticipated that up to $1,500,000 of the funds available will be needed as part of the planning process. These funds will be used for data collection, analysis, general planning and community engagement, as well as design, and engineering and environmental impact analysis.

Administration

As previously noted, total administrative fees for CDBG-DR are set by HUD at 5% of the total allocation. Although DOH will be administering and ultimately responsible for the management and disbursement of funds under this portion of Tranche 3, DOH intends to absorb the cost of this administrative activity and make these administrative funds available to the City of

Bridgeport to offset some of their administrative burden and staff costs which will be necessary for the successful implementation of this component of Tranche 3.

Infrastructure/Infrastructure-related Projects

These funds are currently a place holder for the pilot project will be identified through the local planning process. As required by the Notice, another Substantial Amendment will be prepared and vetted through the required Citizen Participation process.

F. State Allocation Process

In accordance with Section 4-28b of the Connecticut General Statutes, this Allocation Plan is being made available to Legislature for its consideration. It will be incorporated into the federally required Substantial Amendment to the Action Plan ("Substantial Amendment"), which will be made publicly available for a thirty-day public comment period beginning on or about January 8th, 2015. A legal notice requesting comment on the Substantial Amendment will be published in two newspapers, including one in Spanish, on or before January 8th, 2015. A copy of the legal notice and the Substantial Amendment will be sent to all municipalities and public housing authorities, as well as the Community Partners identified in the State's Consolidated Plan for Housing and Community Development. The legal notice and Substantial Amendment will be posted to the Hurricane Sandy designated page on the DOH website for the full comment period.

In accordance with the Notice, the Substantial Amendment, including the Allocation Plan, will be provided to HUD on or before February 23rd, 2015. HUD then has sixty (60) days to review either approve or recommend revisions to the Substantial Amendment.

RBD Substantial Amendment

Upon identification of the pilot project(s) under the Resilient Bridgeport RBD funding, and in accordance with Section 4-28b of the Connecticut General Statutes, a revised Allocation Plan will be made available to Legislature for its consideration. That revised Allocation Plan will provide detail on the community engagement process, as well as the planning process used to identify the pilot project(s). It will further detail the proposed allocation of the remaining Resilient Bridgeport RBD funding.

That information will be used to prepare a federally required amended Substantial Amendment to the Action Plan ("Amended Substantial Amendment"), which will be made publicly available in accordance with the Citizen Participation requirements of the Notice.

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Exhibit B

NOTICE OF PUBLIC HEARING

The State of Connecticut, Department of Housing is holding a PUBLIC HEARING on the DRAFT Substantial Amendment to the Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan for Tranche 3.

A PUBLIC HEARING will be held to discuss the DRAFT Substantial Amendment to the CDBG-DR Action Plan for Tranche 3. The Department of Housing and Urban Development (HUD) released a Federal Register Notice announcing the third allocation of CDBG-DR funding to Connecticut as appropriated by the Disaster Relief Appropriations Act, 2013 (Public Law 113-2). Connecticut's third allocation is for a total $21,459,000 to address infrastructure and mitigation, as well as any remaining unmet housing needs as a result of Superstorm Sandy. Of this total allocation, $10,000,000 is intended to support the Rebuild by Design application of the City of Bridgeport known as "Resilient Bridgeport".

All State residents are invited to attend the PUBLIC HEARING and provide input/comment on the State of Connecticut DRAFT Substantial Amendment CDBG-DR Action Plan Tranche 3. All input received will be considered and included in the final submission to HUD.

Bridgeport
5:00 p.m.
February 4, 2015
City Hall Annex
999 Broad Street
Bridgeport, CT

The Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-270-8261.

NOTICE OF PUBLIC COMMENT PERIOD

The State of Connecticut, Department of Housing is seeking public comment on the DRAFT Substantial Amendment to the Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan for Tranche 3.

A thirty (30) day comment period on the DRAFT Substantial Amendment to the CDBG-DR Action Plan for Tranche 3 will begin on Thursday, January 8, 2015 and end on Sunday February 8, 2015. Effective October 21, 2014, the Department of Housing and Urban Development (HUD) released a Federal Register Notice announcing the third allocation of CDBG-DR funding to Connecticut as appropriated by the Disaster Relief Appropriations Act, 2013 (Public Law 113-2). Connecticut's third allocation is for a total $21,459,000 to address infrastructure and mitigation, as well as any remaining unmet housing needs as a result of Superstorm Sandy. Of this total allocation, $10,000,000 is intended to support the Rebuild by Design application of the City of Bridgeport known as "Resilient Bridgeport".

All State residents, including residents of the City of Bridgeport are invited to provide comment on the State of Connecticut DRAFT Substantial Amendment CDBG-DR Action Plan Tranche 3. Written comments may be sent to Michael C. Santoro, Community Development Specialist, Office of Policy, Research and Housing Support, Department of Housing, 505 Hudson Street, Hartford, CT 06106-7106 or to CT.Housing.Plans@ct.gov through midnight on Sunday, February 8, 2015.

A Public Hearing and Legislative Hearing will be held during the thirty day public comment period at the Legislative Office Building, Hartford, Connecticut at a date and time to be determined. A request for a direct notice of the time and date of the hearing may be sent to the address and/or email above.

All comments received at the Public Hearing and in writing will be summarized and included in the DRAFT Substantial Amendment CDBG-DR Action Plan Tranche 3 submitted to HUD. For a copy of the approved Substantial Amendment CDBG-DR Action Plan Tranche 2 and related information, please refer to the Department of Housing website Superstorm Sandy page at www.ct.gov/doh .

The Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-270-8261.

Publication Date: January 8, 2015

Exhibit C-1

ORIGINAL

VERBATIM PROCEEDINGS

received
12-30-14

STATE OF CONNECTICUT, DEPARTMENT OF HOUSING

DRAFT SUBSTANTIAL AMENDMENT

CDBG - DR TRANCH 3

PUBLIC MEETING

DECEMBER 18, 2014

244 UNIVERSITY DRIVE
BRIDGEPORT, CONNECTICUT

POST REPORTING SERVICE
HAMDEN, CT (800) 262-4102

. . . Verbatim proceedings of a public hearing before the State of Connecticut, Department of Housing, in re: Draft Substantial Amendment CDBG - DR Tranch 3, held at 244 University Drive, Bridgeport, Connecticut, on December 18, 2014, at 6:12 p.m. . . .

MR. MICHAEL SANTORO: Thanks everybody, we're going to get started technologically and I think we've got a very nice crowd. It is by the clock 6:12 p.m. in the evening. My name is Michael Santoro, I am with the State of Connecticut, Department of Housing. I want to thank you all for coming to this public hearing, community discussion, and roundtable.

I'm going to talk about the open public hearing portion of tonight's agenda, there is an agenda around I believe -- I believe it was distributed. And if you don't have one I think there's at least one at every table. The evening will go like this. We're going to open the public hearing. If anyone would like to speak about either the CDBG - DR, Substantial Amendment Tranch 3, or the Resilient Bridgeport RBD activities, we're

1 going to ask you to come sign your name, and then the
2 microphone at the table in front of me will be at your
3 disposal.
4 And after that we will close the public
5 hearing and then we'll have a presentation by David
6 Kooris with the City of Bridgeport and additional
7 activities as indicated on the agenda. I'm going to talk
8 now a little bit in advance of the public hearing
9 component to give you an idea of why we're here, what the
10 Substantial Amendment Tranch 3 process is all about, and
11 how the process for the State will be going forward
12 relative to both our funds and the funds that are
13 targeted for the City of Bridgeport.
14 Okay for anybody who doesn't know, Monday,
15 October 29, 2012, Super Storm Sandy hit the State of
16 Connecticut. The majority of the communities along the
17 shore suffered a great deal of damage and the U.S.
18 Department of Housing and Urban Development was charged
19 by Congress to administer about $16 billion worth of
20 federal assistance. Most of that was funneled through
21 what is called the Community Developmental Block Grant
22 Disaster Recovery Program.
23 Governor Malloy designated the Department
24 of Housing as the lead agency for administering those

1 funds. As in the State of Connecticut, we were the
2 agency with the most experience relative to the Community
3 Development Block Grant Program. Disaster Recovery is a
4 component of and a subset of the Community Development
5 Block Grant Program.
6 We originally were allocated approximately
7 $72 million in Tranch 1, we got another $66 million in
8 Tranch 2, and we just received our third notification of
9 funds in the amount of $11.459 million to be administered
10 by the State of Connecticut. In addition thanks to the
11 efforts of the City of Bridgeport under the Resilient
12 Bridgeport Initiative, an additional $10 million was made
13 available to the State of Connecticut for activity in the
14 City of Bridgeport.
15 What we're talking about tonight are both
16 pots of money, the $11.459 million that the State of
17 Connecticut will administer and which will be targeted to
18 activities in either New Haven or Fairfield Counties in
19 accordance with the notice in the Federal Register, and
20 the $10 million that is being used through the City of
21 Bridgeport to address issues identified in the Resilient
22 Bridgeport Initiative under the rebuild by design
23 process.
24 Now I know most of you in the room, I

1 believe, participated in the RBD process. Can I get a
2 show of hands of everybody who participated in RBD?
3 Okay. I thank you all for coming and I really appreciate
4 your continued interest and support for that activity.
5 We will be drafting a Substantial
6 Amendment to our Action Plan in accordance with the
7 notice that will address how we intend to use the $11.459
8 million and how the $10 million will be targeted as a
9 first step in the Resilient Bridgeport RBD process. So
10 we are here tonight to take comment prior to the
11 generation of that Draft. After tonight we will take any
12 comments that were received either in writing or at
13 tonight's public hearing portion, and those comments will
14 be incorporated into the Substantial Amendment.
15 We anticipate having a Draft Substantial
16 Amendment that will be put out for a 30-day public
17 comment period beginning on or around January 8th, so
18 this is not your one and only shot. As a matter of fact,
19 this is a preliminary shot at both the Substantial
20 Amendment and the activities related to Resilient
21 Bridgeport and the RBD process. That public hearing --
22 that public comment period, again, we expect to begin
23 somewhere around January 8th.
24 It is a 30-day public comment period

1 mandated by the Federal LOTUS, during which period of
2 time we will also have a legislative and public hearing
3 in Hartford. That is required by State statute, and that
4 process will happen concurrent with the public hearing
5 process required through the federal government.
6 After that public comment period and
7 legislative public hearing we will have a final
8 Substantial Amendment Action Plan, which will be
9 submitted to HUD on or before February 23rd. HUD has 60
10 days to review that plan. If they like it, they'll
11 approve, if they don't like it, they'll get back to us
12 with modifications and we go from there.
13 At this point in time if there are any
14 questions prior to us opening the floor to public
15 comment, just give me a -- raise your hand and I will be
16 happy to try to answer them before we go. If you could,
17 give us your name, spell it, and then what can we do for
18 you.
19 MS. LYDIA SILVAS: My name is Lydia
20 Silvas, S-I-L-V-A-S. I live --
21 MR. SANTORO: Okay, sorry. If you have a
22 question, I'm sorry, can you come up here and speak into
23 the microphone because we are -- this is actually being
24 transcribed and it will be incorporated into the

1 Substantial Amendment.
2 Now understand, the Q&A will -- after Q&A
3 you'll also have an opportunity to come up and simply
4 make a statement if you would like. That one or this
5 one, wherever you'd like.
6 MS. SILVAS: Hello -- okay.
7 MR. SANTORO: That's good.
8 MS. SILVAS: I just want to know if the
9 comments for our points for the Amendment that are made
10 will be posted for people to look at prior to the
11 hearing?
12 MR. SANTORO: No, this is not really set
13 up to operate in the format of a blog where they talk --
14 you're looking for an interactive -- somebody makes a
15 comment and then you can --
16 MS. SILVAS: No, no --
17 MR. SANTORO: -- okay.
18 MS. SILVAS: -- I mean, if they will be
19 posted anywhere online or on a State website or anything
20 for people to look at just to see feedback as to what
21 people are wanting to amend or to make suggestions about.
22 MR. SANTORO: Again, any comments you make
23 tonight will be in the Draft Amendment that is also
24 public comment.

1 MS. SILVAS: Okay.
2 MR. SANTORO: So if that's what you mean,
3 the answer is yes.
4 MS. SILVAS: And where is -- where could
5 we view that?
6 MR. SANTORO: That would be posted at the
7 Department of Housing's website, which is www.ct.gov/DOH,
8 for Department of Housing. There's actually a Hurricane
9 Sandy page. If you go there you can see this Substantial
10 Amendment, all of our prior documents, program materials,
11 etc.
12 MS. SILVAS: Okay, thank you.
13 MR. SANTORO: Okay?
14 MS. SILVAS: Yup.
15 MR. SANTORO: Again, any other questions
16 relative to either the process or how we go forward.
17 Ma'am, if you would -- come up to this microphone if you
18 would.
19 MS. ELAINE WARD: I really don't need a
20 microphone.
21 MR. SANTORO: Okay --
22 MS. WARD: I just want to get the address
23 again please.
24 MR. SANTORO: Oh sure, www.ct.gov, that's

1 the State of Connecticut's website, and if you forward
2 slash DOH for Department of Housing.
3 MS. WARD: Okay, thank you.
4 COURT REPORTER: Can I just get your name
5 for the record?
6 MS. WARD: Elaine Ward.
7 COURT REPORTER: Thank you.
8 MR. SANTORO: Thank you.
9 MS. WARD: CCE&J.
10 MR. SANTORO: Okay, any other questions?
11 Otherwise, if you would like to make comment either on
12 where you believe we should target the State's $11.459
13 million or comment on where you believe Resilient
14 Bridgeport should target or use the $10 million being
15 made available through us, we are happy to take your
16 comments at this time.
17 If you would come up, sit in front of the
18 microphone, say whatever you want to say. Please again,
19 identify yourselves and spell your name for the record.
20 This gentleman here?
21 MR. GREG BRELAND: Greg Breland, B-R-E-L-
22 A-N-D. There's a low point where the Remington Shaver
23 plant is, and assuming money is going to be short or
24 going to be constricted or at least there's the

1 possibility of it, I would suggest we focus if we do have
2 limited funds along that Remington Shaver area. I think
3 that will stop a lot of the storm surge from coming into
4 the south end.
5 MR. SANTORO: Thank you very much. I
6 assume that's specifically targeted at the $10 million
7 under Resilient Bridgeport?
8 MR. BRELAND: It's directed toward the
9 storm surge or however you want to play with it.
10 MR. SANTORO: Okay, thank you. The
11 gentleman in the checkered shirt and then we'll get to
12 the gentlemen at the front table here. Again if you
13 would, give your name, spell it and --
14 MR. STUART SACHS: Good evening, my name
15 is Stuart Sachs, that's S-T-U-A-R-T, and the last name is
16 S-A-C-H-S. I'm concerned about Ash Creek, which is the
17 boundary between Bridgeport and Fairfield and the
18 coordination of collaboration between the two Towns.
19 That is a waterway that is an estuary
20 tidal. It can easily affect not only the houses directly
21 in Bridgeport but also a good portion of the Town of
22 Fairfield, which is across the river. I have my own
23 interest hoping for Bridgeport's care and protection.
24 Thank you.

MR. SANTORO: Wonderful, thank you for your comments. We really appreciate it. This gentleman over here.

MR. JACK BANTA: Hi, Jack Banta, City Council, 131st District. My question is -- I'd like to piggyback off of what Mr. Breland was saying about as far as the storm surge.

I have taken the time with the Harbor Master, he has taken me around the Bridgeport waterfront, and basically the discharge pipes that we have for the most part are pretty much parallel with the water. So basically what we're having is when we get a high tide and a heavy rainstorm, it doesn't have to even be at the stage of a hurricane or whatever, our sewage system is -- you know, the water is raising and there's no place for the water to go.

I'm not an engineer by any stretch, you know, I'm an electrician, blue collar, but my question to you is can we take some of that money and perhaps -- I don't know if this is private land. I would assume it's Sikorsky-owned and I know some of it is City-owned. Can we perhaps maybe trench back, perhaps elevate the storm drains that are -- that will eventually lead into the -- I forgot the name, the other waterfront over there. Can

1 anybody help me out?
2 MALE VOICE: Cedar Creek.
3 MR. BANTA: Cedar Creek, that's the one --
4 into Cedar Creek because again, even the pipes that come
5 up on Anniston Avenue which also go into Cedar Creek,
6 they're just constantly under water just about any time
7 of the day.
8 That's like when the time is right and the
9 tide is right, that's when we are basically pretty much
10 due for disaster.
11 MR. SANTORO: Thank you very much.
12 MR. BANTA: Thank you.
13 MR. SANTORO: If you have data or
14 information that you'd like to share as we go out, not
15 just through this process but as part of Resilient
16 Bridgeport -- and this goes for anyone in the room, if
17 you have data or information --
18 FEMALE VOICE: I have pictures.
19 MR. SANTORO: -- be sure to share it as
20 part of the community discussion, which is a continuation
21 of the RBD process that will occur after tonight and in
22 the coming months.
23 MR. BANTA: Thank you.
24 MR. SANTORO: Okay, anyone else care to

1 make a comment relative to the generation of the
2 Department's Draft Substantial Amendment? Just so you --
3 and I probably don't need it now Hermia. The attractive
4 young lady to my left is Hermia Delaire. She's the
5 program manager for CDBG - DR in the State of
6 Connecticut.
7 We brought Hermia onboard specifically to
8 manage the CDBG - DR process. She and her dedicated
9 staff deal solely with Hurricane Sandy, the work
10 associated with Hurricane Sandy in administering the
11 funds under Hurricane Sandy. The silver-haired lady in
12 the back is Liz Wenson.
13 MS. LIZ WENSON: That would be me.
14 MR. SANTORO: That would be Liz, she works
15 directly for Hermia specifically on infrastructural-
16 related activities under CDBG - DR.
17 If there are no further comments -- last
18 call for everybody, we will actually close the public
19 hearing portion of tonight's agenda. We're going to turn
20 the agenda over to Mr. David Kooris for the City of
21 Bridgeport, there is an agenda of activities.
22 I believe the City is very interested in
23 the specific activities and interest that you have to the
24 City and in continuing the discussion around rebuild by

design in Resilient Bridgeport.

Thank you very much for your time. David, the floor is yours.

(Whereupon, the hearing was concluded at 6:30 p.m.)

HEARING RE: CT DEPARTMENT OF HOUSING/DRAFT AMENDMENT
DECEMBER 18, 2014

INDEX OF SPEAKERS

	PAGE
LYDIA SILVAS	6
ELAINE WARD	8
GREG BRELAND	9
STUART SACHS	10
JACK BANTA	11

CERTIFICATE

I, Paul Landman, a Notary Public in and for the State of Connecticut, and President of Post Reporting Service, Inc., do hereby certify that, to the best of my knowledge, the foregoing record is a correct and verbatim transcription of the audio recording made of the proceeding hereinbefore set forth.

I further certify that neither the audio operator nor I are attorney or counsel for, nor directly related to or employed by any of the parties to the action and/or proceeding in which this action is taken; and further, that neither the audio operator nor I are a relative or employee of any attorney or counsel employed by the parties, thereto, or financially interested in any way in the outcome of this action or proceeding.

In witness whereof I have hereunto set my hand and do so attest to the above, this 29th day of December, 2014.

Paul Landman
President

Post Reporting Service
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Exhibit C-2

VERBATIM PROCEEDINGS

STATE OF CONNECTICUT, DEPARTMENT OF HOUSING

DRAFT SUBSTANTIAL AMENDMENT

CDBG - DR TRANCH 3

PUBLIC MEETING

FEBRUARY 4, 2015

244 UNIVERSITY DRIVE
BRIDGEPORT, CONNECTICUT

POST REPORTING SERVICE
HAMDEN, CT (800) 262-4102

. . . Verbatim proceedings of a public hearing before the State of Connecticut, Department of Housing, in re: Draft Substantial Amendment CDBG - DR Tranch 3, held at 244 University Drive, Bridgeport, Connecticut, on February 4, 2015, at 5:12 p.m. . . .

MR. MICHAEL SANTORO: Okay, good evening and thank you very much for coming. It is 5:12 p.m. on February 4, 2015. I'm here to open the public hearing on the Substantial Amendment for the Community Development Block Grant Disaster Recovery Funds, Tranch 3.

This public hearing was noticed, how many days ago --

MR. PARAG AGRAWAL: A couple of weeks.

MR. SANTORO: -- about two weeks ago. And the public comment period for this particular plan ends, and I don't even have it here -- at the end -- at February the 8th.

Currently, there is no one here to testify in support of or comment on the Substantial Amendment. In attendance are myself, Mike Santoro, and --

MR. AGRAWAL: Parag Agrawal, City of Bridgeport.

MR. SANTORO: -- although --

COURT REPORTER: Tynan Cooney, Court Reporter.

MR. SANTORO: -- oh, and I stand corrected. We have at least one individual in attendance. Please, come sit at the table. If you're interested in speaking please sign up, but otherwise I'll do a quick synopsis of the plan and we'll move on.

Are you interested in speaking or providing comment?

MR. STEVE HLADUN: No, I'm just here to watch.

MR. SANTORO: No, okay, very good. So that being said, we will pause transcription for about 10 to 15 minutes in case someone shows up. We'll reopen if that is the case and otherwise, we'll go from there. Thank you very much.

(off the record)

MR. SANTORO: Back on the record. Well, I don't see anybody else coming so -- okay, I'll do a quick synopsis of our Substantial Amendment.

The State of Connecticut, through the

Department of Housing, is being allocated $11.459 million under Tranch 3 of the CDBG - DR Program. In addition, $10 million is being targeted through the State of Connecticut to be used in support of Resilient Bridgeport under the RBD, or Rebuild By Design process.

The State of Connecticut continues to work closely with the City with regard to the planned activities associated with the $10 million. With regard to the $11.459 million allocated to the State for additional activities under CDBG - DR, our intention is to continue those programs originally established under Tranch 1 and Tranch 2 of CDBG - DR, and to allocate the funds as follows:

$6.886 will be going to owner-occupied housing rehabilitation; $3 million will be going for multi-family rehabilitation and new construction; $1 million will be set aside for infrastructure or infrastructure-related projects; and the federally allocated administrated fund of $572,950.00 will be spent on administrative costs associated with the preparation of this Plan and the implementation of those funds.

With that, I note it is 11 -- excuse me, 5:26. We have no one who is interested in testifying either on behalf of, in support of, or against the Plan as

proposed. And as such, we close this public hearing.

(Whereupon, the hearing was concluded at 5:26 p.m.)

Exhibit D

REBUILD
BY
DESIGN

Michael C. Santoro
Community Development Specialist
Office of Policy, Research and Housing Support
Department of Housing
505 Hudson Street
Hartford, CT
06106-7106

February 6, 2014

Dear Mr. Santoro,

Rebuild by Design respectfully submits the following comments for the State of Connecticut's Substantial Amendment for the third tranche of CDBG-DR funding as it pertains to developing elements of "Resilient Bridgeport," a proposal created during the 2013-2014 Rebuild by Design competition.

The State of Connecticut and City of Bridgeport have dedicated laudable creativity, perseverance, and commitment to developing a local vision for resiliency. This memo highlights key elements of the approach articulated within the Substantial Amendment and recommends several actions to help the government most effectively cultivate resiliency as implementation moves forward with $10 million in federal CDBG-DR funding.

South End Pilot Project

The State and City have recognized the value of directing their current resources to preliminary projects that will protect the Seaside Village co-op, Marina Village public housing complex, and neighborhoods in the South End.

(1) Rebuild by Design recommends that the State and City strive for transparency to the greatest extent possible during the implementation process, with the explicit aim of using the current developments to leverage new funding that can expand project implementation to other parts of the city.

(2) Rebuild by Design also recommends that the City continue to include collaboration with key community stakeholders as a fundamental part of its ongoing strategic planning for these projects and others: rather than developing a resiliency strategy, the government can co-develop one with community members to ensure that implementation upholds the larger vision embodied by the Resilient Bridgeport project.

The collaborative process established during the competition will promote community-based resiliency, foster broad public buy-in, and help secure additional funding for implementing the full Resilient Bridgeport proposal.

Downtown Design Center

The State and City are dedicating resources to developing a Downtown Design Center to "bring together faculty, staff, and students from area universities." The Center was envisioned as part of a comprehensive plan for Bridgeport's resiliency.

(1) Rebuild by Design urges the State and City to ensure that the Center includes local stakeholders alongside experts to develop strategies that directly address the lived experiences of those Bridgeport residents most in need of enhanced coastal resilience. As part of the Center's mission to foster resilience within local populations, its programs must continually keep community involvement at the center of its interactions.

(2) Rebuild by Design recommends the State and City continue to include local residents, community organizations, and other stakeholders in decisions about the Center's construction, programming, and resource allocation as it is designed, built, and used. By involving the community in strategic planning and implementation, the City will maintain Resilient Bridgeport's conception of the Center as a resource whose resiliency strategies will directly benefit local residents.

Accessibility

The State and City have demonstrated their commitment to continual community collaboration by scheduling regular Neighborhood Revitalization Zone meetings; however, the government must ensure that the public has enough technical capacity to play a meaningful role in public discussions around both the South End pilot projects and Downtown Design Center.
Rebuild by Design recommends holding education sessions where key members from community groups can learn from consultants or representatives of the project teams to close the gap in expertise, vocabulary, and information that exists for many of the community stakeholders who will be most involved in project implementation. Educational sessions offering an

opportunity to learn about technical, planning, or design issues will empower community members to become partners.

Transparency and Inclusivity

Rebuild by Design encourages the City to liaise with community members and key stakeholders to ascertain the best methods of promoting transparency during the South End projects and the Downtown Resilience Center development; the community's input should be sought as to the optimal formats and frequency for communications going forward.

Rebuild by Design is available to offer assistance in any capacity as the Department of Housing and the City of Bridgeport develop plans for both an effective pilot and the Downtown Design Center both in the process of the competition and the product of the final proposal We would welcome the opportunity to share these learnings and help develop create effective processes for including communities, key stakeholders, and look forward to a continued partnership with both the City of Bridgeport and State of Connecticut.

Sincerely,

Amy Chester
Managing Director
Rebuild by Design