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FAIR SHARE HOUSING MODEL FOR CONNECTICUT, 2020

OPEN COMMUNITIES ALLIANCE

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Prepared for and in collaboration with:

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EXECUTIVE SUMMARY

Connecticut needs more and more diverse affordable housing throughout the state in all kinds of towns, particularly those that have not yet provided significant opportunities for housing choice and multifamily dwellings, as required by state law.

To address these needs, the Open Communities Alliance has prepared a 14-step fair share model that assesses regional housing need in Connecticut today (2020) and allocates that need fairly to each region's towns. The long-established regions of Connecticut's nine regional councils of government serve as the basis for the Housing Regions for this fair share model.

Recognizing that the state's affordable housing needs have accumulated over decades, and cannot reasonably be satisfied in even one decade, the Open Communities Alliance model intentionally adopts a narrow definition of Current Need of 137,304 affordable housing units, which is only 36% of Connecticut's 380,000 lower income households who currently spend more than 30% of their income for housing.

This model then allocates this Regional Current Need (Fair Share) to each Housing Region's towns based on differences in ratables, household income, poverty, and multifamily housing among the towns. Next, the model screens, pools, and reallocates the Gross Fair Shares initially allocated to High Poverty towns, and incorporates a Transition Adjustment Factor that recognizes that the need for affordable housing has accumulated over decades and cannot be remedied overnight. Finally, the model then calculates the allocated and, in some cases, adjusted Fair Share for each town, for a statewide total of 120,776 affordable housing units as of 2020. Appendix A presents the Fair Share for each of the 169 towns in Connecticut, both by Housing Region and alphabetically.

This report explains in detail the steps and data used in the fair share model to make these calculations.

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INTRODUCTION

Prepared for and in collaboration with the Open Communities Alliance ("OCA"), this report presents a methodology for assessing and allocating fairly the current need for affordable housing in Connecticut by lower income families and individuals. This report begins by defining several key terms and providing some context on housing needs in Connecticut. Next, the scope and focus of this methodology are explained, followed by an articulation of the principles that have guided the preparation of this methodology.

The core of this report is a step-by-step presentation in 14 steps of this fair share model ("model") and its calculations, both regional assessments of current affordable housing need, resulting in a statewide Current Need of 137,304 housing units, and allocations of Regional Current Need (Fair Share) to each Housing Region's towns. An Excel workbook, available at this link [https://www.ctoca.org/fairshare], constitutes the fair share model and its data, algorithms, calculations, results, and data sources. Appendix A presents the calculated Allocated Fair Share, i.e., number of needed affordable housing units, for each of the 169 towns in Connecticut.

Finally, the need for affordable housing in Connecticut's towns and regions has accumulated over decades. Consequently, the Model includes a Transition Adjustment Factor. As applied, the statewide total adjusted Fair Share is 120,776 affordable housing units.

DEFINITIONS

"Affordable housing" means, for this methodology and report, income-restricted, safe, decent housing sold or rented such that the cost of housing for a very low income or a low-income household is less than 30% of gross household income, adjusted for household size.

"Cost-burdened" means a household spends more than 30% of its income on housing. A household that spends more than 50% of its income on housing is considered "severely cost-burdened." These households have less disposable income to spend on food, transportation, health care, clothing, and other essentials of daily life.

"Low-income household" means a household whose income is more than 50% and less than 80% of the HUD Adjusted Median Family Income ("HAMFI"), [1] as defined and calculated annually by the U.S. Department of Housing and Urban Development ("HUD") by HUD Metro Fair Market Rent Area ("HMFA")[2] throughout the United States for its Section 8 (Housing Opportunity Voucher) Income Limits program.

"Very-low income household" means a household whose income is 50% or less than the HAMFI.

"Extremely low-income household" means a household whose income is 30% or less than the HAMFI.

"Lower income household" means a household whose income is less than 80% of the HAMFI, i.e., includes both extremely low- and very low-income households.

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[1] For HUD's step-by-step explanation of how it calculates median family income, see "Median Family Income Calculation," https://www.huduser.gov/portal/datasets/il/il2019/2019MedCalc.odn For HUD's explanations of how it calculates income limits by category or tier, see the HUD explanations for extremely low income, very low income, and low income in its FY 2020 Income Limits Documentation System, https://www.huduser.gov/portal/datasets/il/il2019/2019summary.odn <accessed April 23, 2020>

[2] HUD cautions that its HMFAs "are not comparable to any standard Census geography" used by the U.S. Census Bureau. In New England, HUD bases its HMFAs on towns, while elsewhere in the United States these areas are based on Metropolitan Areas and nonmetropolitan counties defined by the Office of Managements and Budget. "HUD Metropolitan Fair Market Rent Areas," https://www.huduser.gov/portal/datasets/il/il2019/area_definitions.odn?systype=IL&year=2020&wherefrom=geo <accessed February 5, 2020>

For Connecticut, HUD annually calculates separate sets of median family incomes and income limits for 12 different regions of the state, known as HUD Metro Fair Market Rent Areas ("HMFAs"), using HUD's geographic area definitions for determining Fair Market Rent ("FMR"), as shown in Figure 1.

Figure 1: Map of Connecticut HUD Metro Fair Market Rent Areas (HMFAs)

Source: HUD Web site, https://www.huduser.gov/portal/datasets/mtsp/mtsp20/area-definitions.pdf, <accessed September 14, 2020>
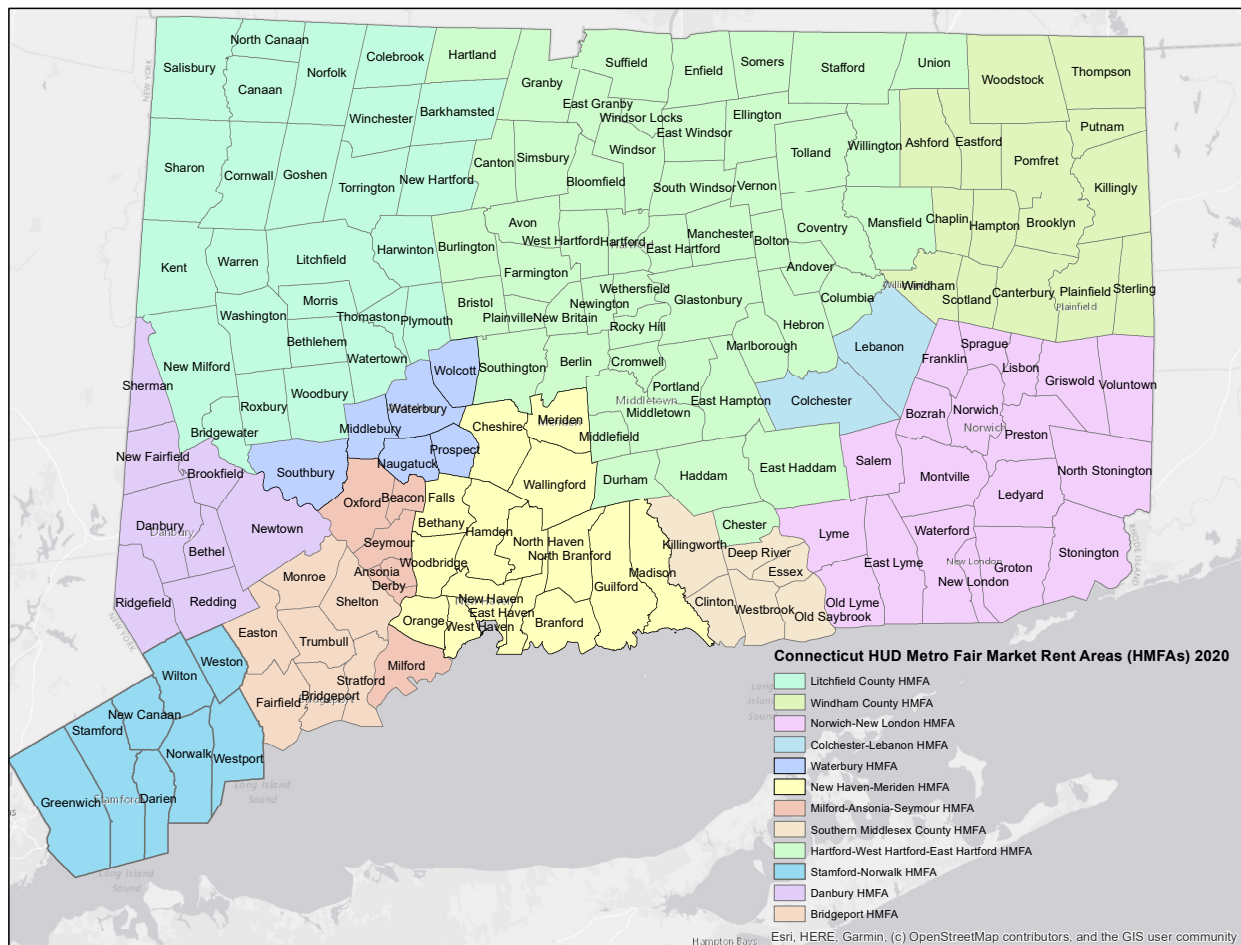
HUD calculates a median family income for a four-person family for each of these areas, making certain adjustments, and then adjusts income limits for family size and percentage of adjusted median family income.[3] [4]

HUD uses these regional income limits to determine the eligibility of applicants for its assisted and public housing programs. Connecticut and other states use these HUD income limits to administer their affordable housing programs. Income eligibility for more than eight million assisted affordable housing units across the United States is determined using these HUD income limits.[5] Each year the Connecticut State Department of Housing ("DOH") prepares and posts a table with "DOH Development Program Limits based on the HUD Median Incomes" for the 12 HMFAs using the HUD income limits for 11 different tiers of income limits used in several housing programs, including the three tiers calculated by HUD: extremely low-income, very low-income, and low income.[6]

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[3] For an example of the adjustments, for its FY 2020 Income Limits, HUD began this calculation with a special tabulation by the U. S. Census Bureau of estimates for median family income from the 2013-2017 5-Year American Community Survey ("ACS"), Table B19113, but used 2017 1-Year ACS estimates that were available and deemed reliable before adding a Consumer Price Index ("CPI") inflation factor and rounding to the nearest $100. The lower income limit is 80% of the resulting HAMFI. HUD also calculates the income limits in three categories – extremely low, very low, and low – with adjustments by eight family sizes. HUD's annual Income Limits Documentation System provides these limits for every HMFA.

[4] To review the calculations of the HAMFI for any HUD FMR Metro Area, see the HUD Web site and in the drop-down windows chose a state and then choose a county or town. Buttons on the Web page marked "Explanation" lead to detailed explanations of the calculations each year of income limits.
https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn <accessed April 29, 2020>

[5] The affordable housing supply of the United States subject to HUD-based income limits currently (2020) includes: (a) 3.13 million units financed through Low Income Housing Tax Credits, (b) 2.2 million federal Housing Opportunity Vouchers, (c) 1.3 million public housing units, (d) 1.0 million Project-Based Section 8 housing units, (e) about 360,000 HOME-funded units, and (f) about 356,000 Section 202 (senior) and Section 811 (disability) units, plus additional units funded by state programs and private sector inclusionary developments.
Sources; HUD, Center for Budget and Policy Priorities, and National Housing Law Project:
https://www.huduser.gov/portal/datasets/lihtc.html
https://www.cbpp.org/research/housing/federal-rental-assistance-fact-sheets - US
http://nhlp.org/files/multifamily_programs_info_packet.pdf
<accessed June 12, 2020>

[6] Connecticut State Department of Housing, DOH Development Program Income Limits Based on HUD Median Income, (Revised 9/16/2020) https://portal.ct.gov/DOH/DOH/Additional-program-pages/HUD-Rent-and-Income-Limits <accessed October 20, 2020>

These income categories are often referred to in terms of percentage of area median income ("AMI"), e.g., that low-income means less than 80% of AMI. However, it is important to note that the HUD median family incomes, and resulting income limits, are not mathematically correct medians, due to the adjustments that HUD makes to the sample data on median family incomes it obtains annually as special tabulations from the U.S. Census Bureau.[7] Also, it is important that the "area" in "area median income" be specified, as various geographic definitions are possible. Finally, while the HUD income limits are based on "family" median income data, they are applied as well to households in calculating housing need and determining income eligibility for assisted housing. Under U.S. Census Bureau definitions, all families are households, but not all households are families. While the U.S. Census Bureau defines a "family" as two or more related persons living together, HUD calculates income limits as well for a one-person "family," which by U.S. Census Bureau definition is considered a "household."[8] For that reason, this fair share methodology refers to households.

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[7] See the annually updated HUD general explanation of its income limits methodology, "Methodology for Determining Section 8 Income Limits,"
https://www.huduser.gov/portal/datasets/il//il20/IncomeLimitsMethodology-FY20.pdf
HUD explains in a FAQ the reason low income limits do not equal 80% of median income: "There are many exceptions to the arithmetic calculation of income limits. These include adjustments for high housing cost relative to income, the application of state nonmetropolitan income limits in low-income areas, and national maximums in high-income areas." https://www.huduser.gov/portal/datasets/il.html - 2020_faq <accessed April 23, 2020>
See also the specific HUD explanation for the calculation of both adjusted median family income and income limits, posted annually for each HMFA. For an example, the calculations for the New Haven-Meriden, CT HUD Metro FMR Area for FY 2020, see
https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn <accessed April 23, 2020>
[8] For the US Census Bureau definitions of "family" and "household," see US Census Bureau, Subject Definitions,
https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html#householder <accessed April 29, 2020>

CONTEXT: AFFORDABLE HOUSING NEEDS IN CONNECTICUT, 2020

- Population Estimate, July 1, 2019: 3,565,287[9]

- Population in Households (2018): 3,466,662[10]

- Households (2018): 1,367,374[11]

- Housing Units, July 1, 2018: 1,521,117[12]

- Occupied Housing Units (2018): 1,378,091[13] (90.5% of total housing units)

- Affordable Housing Units: 172,277 (11% of total housing units)[14]

- Population in Group Quarters (2018): 114,842[15]

- Homeless (Point in Time Survey, 2019): 3,033 people[16]

- Supportive Housing Need (2020): 10,582 units[17]

- Cost-Burdened Households (2016): 474,040 (35.0% of total)[18]

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[9] U.S. Census Bureau, QuickFacts, Connecticut, https://www.census.gov/quickfacts/CT <accessed February10, 2020>

[10] U.S. Census Bureau, QuickFacts, Connecticut, https://www.census.gov/quickfacts/CT 2018 ACS1-Year Estimates, DP02 <accessed February 10, 2020>

[11] U.S. Census Bureau, QuickFacts, Connecticut, https://www.census.gov/quickfacts/CT 2018 ACS1-Year Estimates, S2601A <accessed February 10, 2020>

[12] U.S. Census Bureau, 2018 ACS 1-Year Estimates, DP04 https://data.census.gov/cedsci/all?q=ct%20housing%20unit%202018&g=0400000US09&tid=ACSDP1Y2018.DP04&y=2018&cid=DP04_0001E&vintage=2018 <accessed February 10, 2020>

[13] U.S. Census Bureau, 2018 ACS 1-Year Estimates, DP04 https://data.census.gov/cedsci/all?q=ct%20housing%20unit%202018&g=0400000US09&tid=ACSDP1Y2018.DP04&y=2018&cid=DP04_0001E&vintage=2018 <accessed February 10, 2020>

[14] Connecticut State Department of Housing, 2019 Affordable Housing Appeals List (includes publicly assisted housing, rental housing occupied by tenants receiving state and/or federal housing vouchers, ownership housing financed by the Connecticut Housing Finance Authority and/or U.S. Department of Agriculture, and deed-restricted privately developed affordable housing) https://portal.ct.gov/-/media/DOH/2019-Appeals-List-for-online.pdf <accessed September 14, 2020>

[15] U.S. Census Bureau, 2018 ACS 1-Year Estimates, DP02 https://data.census.gov/cedsci/all?q=group%20quarters%20population%20%20connecticut&g=0400000US09&tid=ACSST5Y2018.S2601A&t=Group%20Quarters%20Population&cid=S2601A_C01_001E <accessed February 10, 2020>

[16] Connecticut Coalition to End Homelessness, Connecticut Count, June 2019, https://cceh.org/wp-content/uploads/2019/06/PIT_2019.pdf <accessed February 5, 2020>

[17] Corporation for Supportive Housing (CSH), "Supportive Housing Needs in the United States," https://www.csh.org/supportive-housing-101/data/ - RDDI <accessed May 14, 2020>

[18] HUD, Consolidated Planning/CHAS Data, 2012-2016 5-Year ACS, https://www.huduser.gov/portal/datasets/cp.html <accessed November 5, 2019>

- Households with Severe Cost Burden (2016): 220,685 (16.3% of total households)[19]

- Lower Income Households (<80% HAMFI) (2016): 570,270 (42.1% of total households)[20]

- Cost-Burdened Lower Income Households (2016): 375,850 (66.1% of total lower income households)[21]

- Lower Income Households with Severe Cost Burden (2016): 203,970 (36.5% of total lower income households)[22]

- Extremely Low Income Households with Severe Cost Burden (2016): 135,740 (10.0% of total households)[23] [24]

- Annual Household Income Needed to Afford a Two-Bedroom Rental Home at HUD's Fair Market Rent of $1,374/month (2020): $54,956[25]

- Connecticut Rank Among States by Two-Bedroom Housing Wage (2020): 10th Most Expensive[26]

- Connecticut ALICE families (Asset Limited, Income Constrained, Employed) (2018): 40% of households [27]

Figure 2 presents graphically some of these key facts on the numbers of households in Connecticut by household income tier. It also graphs the share of these households that exceed the widely accepted standard that a household's housing costs should not be more than 30% of income, otherwise they are deemed "cost-burdened."

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[19] Ibid.

[20] Ibid.

[21] Ibid.

[22] Ibid.

[23] Ibid.

[24] Note that this total is based on statewide HUD CHAS data, which differs by 2,014 households from the total of 137,754 households derived from aggregating HUD CHAS data at the town level from Connecticut's 169 towns and used in this fair share methodology as the calculation of Current Need.

[25] National Low Income Housing Coalition, Housing Needs By State, 2020, Website, https://reports.nlihc.org/sites/default/files/oor/files/reports/state/CT-2020-OOR.pdf <accessed August 20, 2020>

[26] National Low Income Housing Coalition, *Out of Reach, 2020*, Website, https://reports.nlihc.org/sites/default/files/oor/OOR_2019.pdf <accessed August 20, 2020>

[27] Connecticut United Ways, *2018 ALICE Report*, Website, https://alice.ctunitedway.org/aliceupdate/ <accessed May 14, 2020>

Figure 2: Connecticut Households and Cost Burden, 2016

Connecticut Households and Housing Cost Burden, 2016
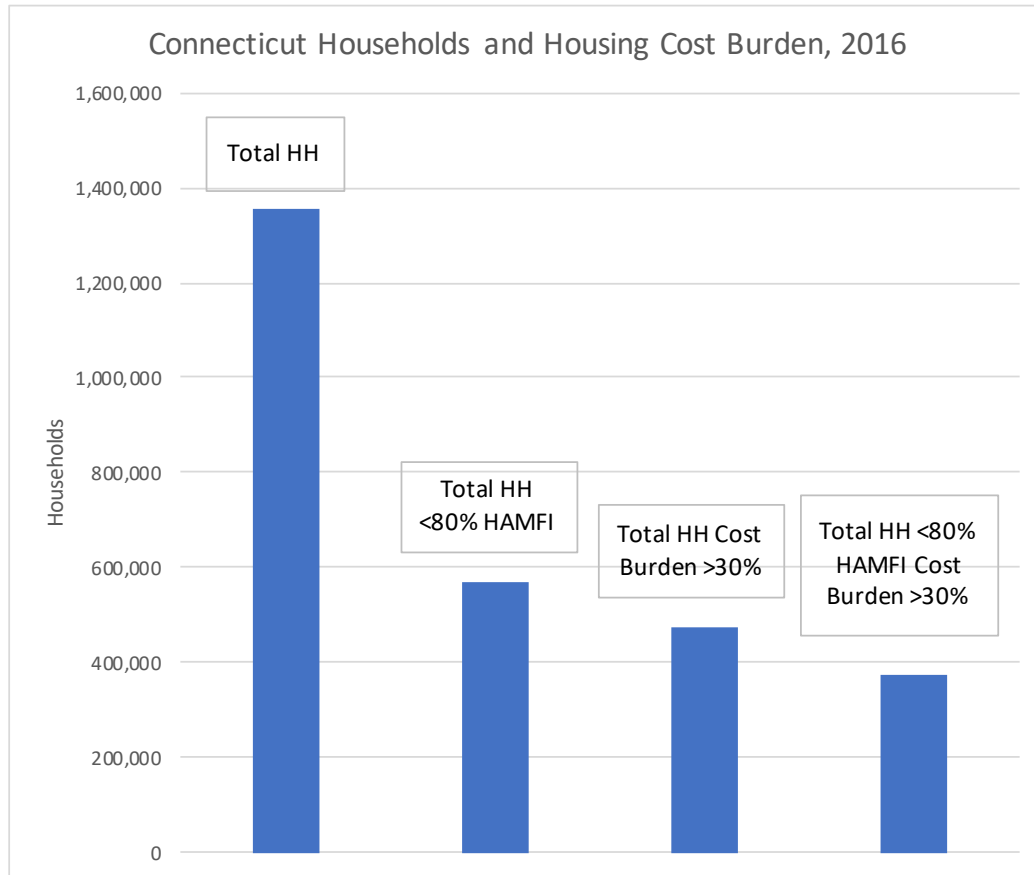
HH = households
HAMFI = HUD Adjusted Median Family Income
Note: This chart is based on HUD CHAS data derived from the 2012-2016 ACS 5-Year, released in late 2019 by HUD.
Source: US HUD, Consolidated Planning/CHAS Data, https://www.huduser.gov/portal/datasets/cp.html <accessed Nov. 6, 2019>
Prepared by David N. Kinsey, PhD, FAICP, May 13, 2020

By definition, all households in the smallest column in this graph, 376,850 existing lower income, cost-burdened households living in Connecticut, are income-eligible for affordable housing. Connecticut's current supply of about 170,000 affordable housing units is important, but by the standard federal metric the "need" is more than twice the existing supply.

SCOPE

This fair share model quantifies recommended municipal responsibility for creating realistic opportunities for affordable housing, defined as a fair share of the Regional Current Need for affordable housing, fairly allocated to all towns in a region. The model has two discrete components: first, defining and calculating the Regional Current Need for affordable housing, and, second, allocating fairly Regional Current Need to each region's towns.

The model's definition of "affordable housing need" is intentionally substantially <u>less</u> than the current "need," on a cost basis, for affordable housing by the estimated 376,850 lower income, cost-burdened households currently living in Connecticut. The model identifies the number of existing extremely low-income households (household income <30% HAMFI) by region who are severely cost-burdened (spend >50% of income for housing costs). HUD's most recent statewide estimate, released in late 2019, is that Connecticut currently has 135,740 households that meet these two criteria: (a) extreme low-income and (b) severe cost-burden, as shown in Figure 3.[28] As defined, housing need is referred to as "Current Need" as of 2020 for the purpose of this fair share methodology.[29] While the 135,740 households in this category are merely 36% of Connecticut's 376,850 cost-burdened lower income households, which is arguably the full population in need of affordable housing, it nevertheless is a substantial, 10% of Connecticut's total households, according to HUD's most recent data, as shown in Figure 3.

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[28] The statewide total calculated by HUD is 135,740 households, but the aggregate of HUD's calculations by town is 137,754 households, as calculated by this fair share model., see Figure 6.

[29] The year "2020" is used in this methodology to describe Current Need for two reasons. First, the methodology was prepared in 2020, so the "current" time is 2020. Second, the best available data is the HUD CHAS data released in 2019, although based on 2012-2016 ACS estimates, which is close to 2020.

Figure 3: Connecticut Housing Need, 2016

Connecticut Housing Need (based on HUD CHAS data for 2012-2016 released August 2019)				
Income Tier	% of HAMFI	Total	Cost Burden (>30%)	Severe Cost Burden (>50%)
Total Households	100%	1,354,715	474,040	220,685
Lower Income Households	<80%	570,270	376,850	208,130
Low Income Households	>50% to <80%	183,600	82,910	20,120
Very Low Income Households	>30% to <50%	171,925	126,445	52,270
Extremely Low Income Households	<30%	214,745	167,495	135,740
Notes:				
1. "HAMFI" = HUD Adjusted Median Family Income				
2. The data in this table are derived from statewide estimates by HUD. The total estimated extremely low income households with severe cost burden is 1,564 fewer than the aggregate total of 137,304 households of the HUD estimates by town, reported in Figure 6				
Source: HUD, Consolidated Planning/CHAS Statewide Data for 2012-2016, released August 5, 2019, https://www.huduser.gov/portal/datasets/cp.html <accessed November 6, 2019>				
Prepared by David N. Kinsey, PhD, FAICP, August 20, 2020, revised May 28, 2021				

Figure 4 displays the relationship between Connecticut's total households, households income-qualified for affordable housing, and the intentionally narrower definition of Current Need in this methodology, i.e., extremely low income households with severe cost-burden.

Figure 4: Connecticut Households and Current Need, 2020
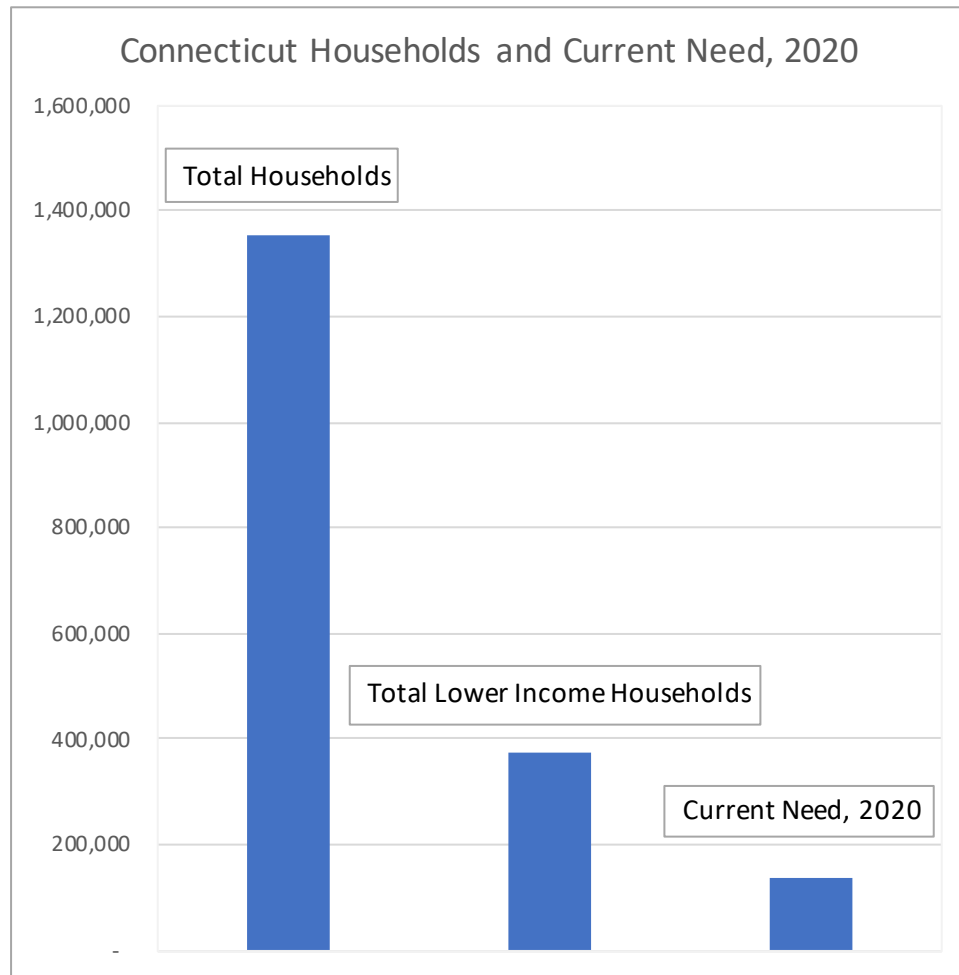
Connecticut Households and Current Need, 2020

(Bar chart with y-axis ranging from - to 1,600,000 in increments of 200,000)

- Total Households (~1,350,000)
- Total Lower Income Households (~375,000)
- Current Need, 2020 (~140,000)

Note: This chart is based on HUD CHAS data derived from the 2012-2016 ACS, 5-Year released in late 2019 by HUD.
Source: US HUD, Consolidated Planning/CHAS Data, https://www.huduser.gov/portal/datasets/cp.html <accessed Nov. 6, 2019>
Prepared by David N. Kinsey, PhD, FAICP, August 20, 2020

Current Need is calculated by Housing Region in this model and then allocated fairly to each Housing Region's towns as its Fair Share. Affordable housing need is defined in terms of households, because households occupy housing units by U.S. Census Bureau definitions.

While affordable housing need in Connecticut is dire and significant by several metrics (see Figures 2, 3, and 4 above), these needs have accumulated over decades. Consequently,

this initiative does not attempt to quantify and allocate responsibility for all of Connecticut's affordable housing needs.[30]

This intentional undercount also recognizes the capacity and record of the home building industry in Connecticut, as evidenced by trends over the past two decades in issuance of housing construction permits, approximately 6,700 permits for housing units per year statewide over 2000-2019 but only 4,500 permits per year more recently during 2010-2019.[31] [32]   This intentional undercount also recognizes the scale of financial subsidies available for affordable housing construction. For example, in the 2019 annual cycle, the Connecticut Housing Finance Authority awarded highly-competitive 9% Low Income Housing Tax Credits for the construction of only 348 affordable housing units and State Housing Tax Credit Contributions (HTCCs) to non-profit developers to finance the construction of only 596 affordable housing units.[33]

Nor does this methodology attempt to project the distribution of newly forming lower income households by age group or expected housing tenure (renters or owners) that will need housing in the future,[34] or assess and allocate the number of housing units needed by region for all income categories in the future.[35]

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[30] This initiative also does not attempt to calculate or estimate the number of lower income households living in substandard housing in need of rehabilitation, the homeless, or persons in need of supportive or special needs housing, such as the disabled, victims of domestic violence, or veterans. If income-eligible, all of these special needs populations would qualify for affordable housing.

[31] Analysis of annual and monthly building permit data for 2000-2019 available from the CT Department of Economic and Community Development, "Housing & Income Data" website, https://portal.ct.gov/DECD/Content/About_DECD/Research-and-Publications/01_Access-Research/Exports-and-Housing-and-Income-Data <accessed June 17, 2020>

[32] Local land use regulation and limited developable land zoned for multifamily housing have also no doubt affected the record of housing construction during 2000-2019.

[33] Connecticut Housing Finance Authority, "2019 Summary Report," pp. 29-31, https://www.chfa.org/assets/1/6/2019_Summary_Report.pdf <accessed August 19, 2020>

[34] SCCOG and SECHA did recently prepare a regional housing needs assessment for Southeast CT RCOG region that did project household growth and housing demand, by age groups and tenure as of 2030; see SCCOG & SECHA *Southeastern Connecticut Housing Needs Assessment*, 2018, http://seccog.org/wp-content/uploads/2018/05/2018_Housing_Needs_Assessment_03162018.pdf <accessed April 27, 2020>

[35] This methodology is much more limited in scope than the California Regional Housing Needs Allocation ('RHNA") system, in which the state calculates future population growth and needed housing at all income levels for more than 20 regions whose regional planning agencies in turn then assign each local government

Instead, this fair share methodology adopts a well-defined portion of current affordable housing need as a proxy for these diverse housing needs, referred to as Current Need. Creating affordable housing opportunities for the needs identified and allocated in this initiative will go a long way towards meeting the state's overall housing needs.

in their regions its allocation of housing need for which the local government must zone to accommodate its share of the regional need established by the state. See California Department of Housing and Community Development, "Regional Housing Needs Allocation and Housing Elements," Website, https://www.hcd.ca.gov/community-development/housing-element/index.shtml <accessed May 13, 2020>

GUIDING PRINCIPLES FOR THE FAIR SHARE HOUSING MODEL

Several principles have guided the development of this fair share housing model and its methodology:

- Make the model transparent and accessible as to data, data sources, algorithms, formulae, and calculations

- Use the best available, most up-to-date, and reliable data

- Use only publicly available data from the U.S. Census Bureau, U.S. Department of Housing and Urban Development, and the State of Connecticut

- Use consistent data sets, to the maximum extent practicable

- Use consistent time periods for start dates and end dates, to the extent feasible

- Make the model as simple and straightforward as possible

- Make the model as accurate as possible, given the limitations of the available data

METHODOLOGY FOR THE FAIR SHARE MODEL

PHASE ONE:
ASSESS HOUSING NEEDS OF HOUSING REGIONS

Step 1: Identify Housing Regions

Connecticut's 169 municipalities (towns and cities) and their surrounding areas have considerable socioeconomic, demographic, and racial/ethnic diversity. For example, while the statewide median household income was $76,106 in 2018, the median municipal household income ranged from a low of $34,338 in Hartford to a high of $219,083 in Weston. [36] Given this diversity, it is reasonable and appropriate to divide the state into regions that generally share some economic characteristics for the purpose of assessing housing needs, otherwise housing that might be deemed affordable in one part of the state would not be affordable elsewhere. For example, while in 2018 the median household in Weston could afford a monthly housing cost of $5,477, the statewide median household could afford a monthly cost of $1,903, and the median household in Hartford could afford only a monthly housing cost of $858, without being cost-burdened.[37]

Several kinds of regions have been delineated in Connecticut for different reasons, encompassing different combinations of the state's 169 municipalities, including:

- Nine "planning regions" for regional councils of government ("RCOGs"), which comprise from six to 38 towns[38]
- Eleven HUD Metro FMR Areas ("HMFA"), grouping from two to 51 municipalities, for which HUD annually calculates median family incomes and sets the income

[36] U.S. Census Bureau, 2018 American Community Survey, 5-Year Estimate, Table B19013. Connecticut Data Collaborative <accessed April 21, 2020>

[37] The calculations cap monthly housing cost at 30% of income.

[38] State of Connecticut, Office of Policy and Management, Regional Councils of Government (RCOGs) in Connecticut. <accessed March 4, 2020> Originally, Connecticut had 15 RCOGs, but in 2014 the Office of Policy and Management completed a comprehensive "analysis of the boundaries of local planning regions" that resulted in some consolidation and realignment of the boundaries into nine planning regions. The analysis considered many relevant factors, including economic regions, economic development districts, labor market areas, natural boundaries, relationships between urban, suburban and rural areas, census and other demographic data, political boundaries, transportation corridors, metropolitan planning agencies, and federal, state, and municipal service delivery regions. CT Gen Stat § 16a-4c (2012).

limits used in affordable, assisted, and public housing programs in Connecticut and nationwide

- Eight counties, although most of their governmental functions were abolished in 1960

- Four Metropolitan Statistical Areas and one Micropolitan Statistical Area ("MSA") used by the U.S. Census Bureau for reporting data, whose delineation corresponds to either a county or one group of three counties

- 26 Public Use Microdata Areas ("PUMAs") defined by the U.S. Census Bureau for disseminating Public Use Microdata Sample ("PUMS") data, comprising either an entire county or from two to seven municipalities in a county depending upon population size

- Nine Labor Market Areas, delineated by the U.S. Department of Labor, Bureau of Labor Statistics, are combinations of municipalities, largely based on commuting flows, for the purpose of compiling, reporting, and analyzing data on employment, unemployment, and workforce availability[39]

The nine RCOGs and their planning regions are well-established and well-recognized in Connecticut planning law and practice. Originally established in 1971, the RCOGs bring together municipalities to address common concerns, coordinate land use and transportation planning on a regional basis, organize shared services, conduct regional planning, and collect, disseminate and analyze data pertaining to each region. Significantly, Connecticut's zoning enabling law requires municipal zoning regulations to

"…encourage the development of housing opportunities, including opportunities for multifamily housing, consistent with soil types, terrain and infrastructure capacity, for all residents of the municipality and the **planning region** in which the municipality is located …" [emphasis added][40]

RCOG planning regions are all agglomerations of towns, so that data available on a municipal basis can be aggregated at a regional level. All of the key data sets used in this fair

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[39] As defined by the Bureau of Labor Statistics, "…a LMA is an economically integrated geographic area within which individuals can reside and find employment within a reasonable distance or can readily change employment without changing their place of residence." U.S. Department of Labor, Bureau of Labor Statistics, Web site, https://www.bls.gov/lau/laugeo.htm <accessed April 21, 2020>
[40] CT Gen Stat § 8-2.

share model, including (a) estimates of lower income households that are cost-burdened, (b) population projections, and (c) population and household counts and estimates, are available at the town level and can easily be aggregated for each RCOG planning region.

The HUD Metro FMR Areas are a critical building block in any fair share housing methodology, as they provide the basis, standard across the United States, for establishing the income limits used to define lower income households. However, the eleven HMFAs do not coincide with the nine RCOGs and have no grounding in Connecticut planning law.

The U.S. Census Bureau reports key data sets in this fair share methodology on a county basis. Also, this fair share model relies in part on population projections, which are inherently more reliable for larger geographic areas, such as counties compared with municipalities, as the larger population base of a county will be less susceptible to short term variations and exogenous events. However, county government in Connecticut no longer exists and has no role in Connecticut planning law and practice.

The Census Bureau's MSAs are important geographies for statistical reporting and providing a metropolitan perspective, while its PUMAs are important for consistent sampling purposes, but neither has any particular linkage with Connecticut planning law or regional planning practice. Also, some of the MSAs encompass Connecticut counties as well as parts of other adjacent states.

Similarly, the Labor Market Areas are important geographies for statistical reporting and economic analysis, but have no linkage with Connecticut planning law.

Consequently, this methodology adopts the RCOG planning regions, with a refinement to promote a more equitable allocation of towns, as the "Housing Regions" for this fair share model, principally because they meet three important criteria:

- The State of Connecticut has delineated these regions under State law for regional planning purposes

- The RCOG planning region boundaries coincide with municipal boundaries that are important due to the availability of key data at the municipal level

- The RCOG planning regions are an integral component of Connecticut's land use planning system[41]

The smallest RCOG planning region by number of towns, the Metropolitan planning region, consists of only six (6) towns, only 3.5% of Connecticut's towns, while the median region has 18 towns and the mean region has 18.8 towns. The Western planning region, adjacent to the west of the Metropolitan region, has 18 towns. Combining these two planning regions for the purpose of this fair share housing model, as required by pending legislation,[42] creates a combined Metropolitan + Western housing region with 24 towns that is more comparable to both the mean number of towns in each housing region. It is a more equitable distribution of towns by the eight housing regions and is adopted in this fair share housing methodology for that reason.[43]

Figure 5 maps these eight Housing Regions.

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[41] Each RCOG is charged with prepared a regional plan of conservation and development, which must be considered by each municipality in the region when it prepares its municipal plan of conservation and development at least once every ten years. CT Gen Stat § 8-23(d).

[42] Connecticut General Assembly, January Session, 2021, Substitute House Bill No. 6611, File No. 543, April 21, 2021, An Act Concerning A Needs Assessment And Other Policies Regarding Affordable Housing and Development, Section 1.(4). https://www.cga.ct.gov/2021/FC/PDF/2021HB-06611-R000543-FC.PDF <accessed April 28, 2021>

[43] With the proposed eight housing regions, the mean is 21.1 towns per region, while the median is19 towns per region.

Figure 5: Connecticut Housing Regions
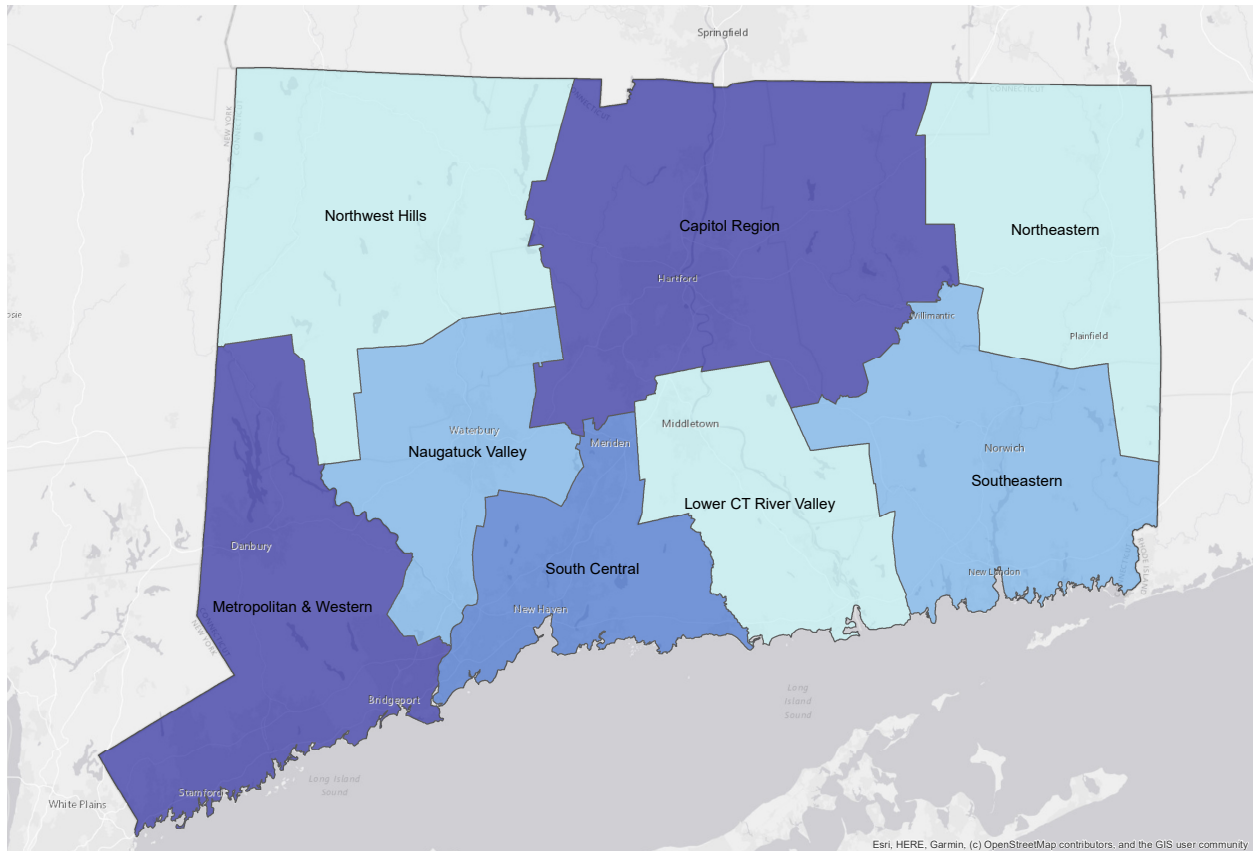
Step 2:   Calculate Regional Current Need (Fair Share), 2020

This fair share methodology defines Current Need as the number of existing extremely low income households (household income <30% of median income) in Connecticut and its Housing Regions in 2020 who are severely cost-burdened (spend >50% of income for housing costs).

HUD calculates this component of affordable housing need, from time-to-time, for states, counties, and "minor civil divisions" ("MCD"), which are towns in Connecticut, based on custom tabulations of American Community Survey data from the U.S. Census Bureau.   As HUD explains,

"These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households."[44]

These federal data are the basis for calculating Current Need by Housing Region, as shown in Figure 6. While the most recent CHAS data, released by HUD on August 5, 2019, are derived from the 2016 ACS 5-Year and 2017 ACS 1-Year,[45] Current Need in this methodology is referred to as of 2020, as the HUD CHAS calculations are the best available and most recent data.[46]

The Current Need of each Housing Region is the aggregate of the HUD calculations by town of the extremely low-income households who are severely cost-burdened by town in each region.

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[44] US HUD, Consolidated Planning/CHAS Data, Web site, https://www.huduser.gov/portal/datasets/cp.html. <accessed April 23, 2020>

[45] Ibid.

[46] HUD has updated the CHAS data used in the first version of the Model and this report and now makes available CHAS data based on 2013-2017 ACS 5-Year data; see US HUD, Consolidated Planning/CHAS Data website, https://www.huduser.gov/portal/datasets/cp.html <accessed May 18, 2021>. This newer data could easily be used to update the Model, but we have not made such a partial update for several reasons. First, the change in households is modest, e.g., an increase of 0.5% in overall households in Connecticut. Second, the Model's fair share allocations are illustrative, with updates explicitly anticipated as updated data becomes available. Third, when the Model is updated, it should be updated on the basis of updated data for all inputs to the Model.

Figure 6: Connecticut Current Need by Housing Regions, 2020

Connecticut Current Need by Housing Regions, 2020			
Housing Region	Total Households (2016)	Lower Income Households (2016)	Current Need (affordable housing units)
Capitol	370,235	157,750	36,498
Lower CT River Valley	70,725	25,070	5,283
Metropolitan + Western Combined	324,290	124,542	35,365
Naugatuck Valley	168,230	76,895	17,822
Northeast CT	36,830	15,525	2,750
Northwest Hills	45,920	18,456	3,498
South Central	220,495	102,789	25,889
Southeastern CT	109,685	49,765	10,200
CONNECTICUT	1,346,410	570,792	137,304

Notes

1. Current Need = Extremely Low Income Households (income <30% HAMFI) with Severe Cost Burden (spending for housing >50% of income)

2. The statewide total of Current Need is the aggregate of data for 169 towns and differs by 1.4% (2,014 units) from the statewide estimate of the U.S. Census Bureau presented in Figure 3

Sources:

HUD, Consolidated Planning/CHAS Data by Towns for 2012-2016, released August 5, 2019, https://www.huduser.gov/portal/datasets/cp.html <accessed November 6, 2019>

OCA Fair Share Model, Tab Current Need

Prepared by David N. Kinsey, PhD, FAICP, August 20, 2020, revised May 26, 2021

The statewide total of Regional Current Need (Fair Share) of 137,304 needed affordable housing

units computed by this fair share methodology must be considered in the context of the overall

need for affordable housing in Connecticut.[47]   Figure 4 above on page 17 charts the key comparisons that are important to recall:

- Connecticut today (2020) has about 1.3 million households

- Connecticut today (2020) has about 0.37 million lower income households (<80% AMI) that pay more than 30% of their income for housing costs (cost-burden)

- The computed Current Need of 137,754 housing units by this methodology represents about one-third (36.6%) of current lower income households in need of affordable housing today (2020)

This intentional undercount of housing need, by almost-two thirds, results from a policy choice by Open Communities Alliance and conceptual and data choices in developing this fair share model. In an effort to be fair and use the best available, most up-to-date, and reliable data, this methodology relies on two key assumptions, deemed reasonable in the context of this significant intentional undercount of need and the representation that the Fair Share calculated is only intended as a proxy for quantifying some of Connecticut's affordable housing needs. These assumptions are:

- RCOG planning regions are the most appropriate "Housing Regions" for this methodology

- HUD calculations, released in August 2019, of extremely low income, severely cost-burdened households by town are a reasonable proxy for current (2020) Current Need, albeit based on 2016 ACS 5-Year data

Now that the regional assessments of housing need have been completed, the next phase of this fair share methodology is to allocate fairly each Housing Region's Regional Current Need (Fair Share) to each town in each Housing Region.

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[47] Note that the statewide total of Current Need is 2,014 households (units), based on aggregated town-level data, is greater than the total of 135,740 households calculated by HUD CHAS statewide data. See Footnote 25.

PHASE TWO:
ALLOCATE REGIONAL CURRENT NEED TO EACH HOUSING REGION'S TOWNS

In the second phase of this fair share methodology, each Housing Region's Current Need is allocated fairly to the towns in the Housing Region. The methodology uses four allocation factors, which are measures of a town's comparative responsibility and capacity for accommodating affordable housing, compared with other towns in the same Housing Region. The four factors are:

- Equalized ratables, 2018
- Household income difference, 2018
- Poverty, 2018
- Multifamily housing, 2018

For each allocation factor, the methodology calculates the total regional value of each factor and each town's percentage, or share, of the regional total of the factor. Stated differently, the value of each allocation factor for each town is divided by the regional total for each allocation factor. The four resulting numbers, expressed as decimals, are averaged and then multiplied by the Housing Region's Regional Current Need to yield each town's Gross Fair Share of the Regional Current Need. All four allocation factors are weighted equally and averaged in allocating Regional Current Need among each Housing Region's towns. The rationale for the allocation factors and the data used to allocate Regional Current Need are identified below in the description of each allocation factor.

Step 3   Calculate the Ratables Allocation Factor

The capacity of a town to accommodate its Fair Share depends in part on its fiscal resources available to support vital local services. The ratables factor uses annual data from the Grand List, the aggregate valuation of taxable property in a town, also known as "ratables," which is available from the CT Office of Policy and Management[48] and the CT Open Data Portal.[49] For a fair comparison of ratables among towns, this methodology uses only equalized valuations, which are available for four property types: (a) residential, (b) apartment, (c) commercial/industrial/public utility, and (d) vacant land. The most recent available equalized data is the Equalized Net Grand List by Town, 2018, maintained by the CT Office of Policy and Management, which is the data source used in this methodology.

This methodology calculates this allocation factor by first adding the equalized valuations by town by Housing Region for four property types: (a) residential, (b) apartment, (c) commercial/industrial/public utility, and (d) vacant land. Second, each town's equalized valuation is divided by the region's total equalized valuation. The resulting ratio or percentage is the town's Ratables Allocation Factor, its share of the region's ratables.

Step 4   Calculate the Household Income Difference Allocation Factor

The capacity of a town to accommodate its Fair Share also depends in part on the financial resources of its resident taxpayers and their ability to provide the fiscal resources necessary to support vital local services. Some towns in a region are more affluent than others. To identify the extent of these differences in household income among a region's towns, this methodology averages two measures of median household income by town by region:

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[48] CT Office of Policy and Management, "Total Grand Lists by Town," Website, <accessed May 27, 2020>
, https://portal.ct.gov/OPM/IGPP-MAIN/Publications/Total-Grand-List-by-Town
[49] CT Data Website, https://data.ct.gov/browse?q=Net+Grand+List+by+Town, <accessed May 27, 2020>

Income Measure No. 1:

Municipal share of the regional sum of the differences between median household income and an income floor ($100 below the lowest municipal median household income in the region) and

Income Measure No. 2:

Municipal share of the regional sum of the differences between median municipal household incomes and an income floor ($100 below the lowest municipal median household income in the region) weighted by the number of households (occupied housing units) in the municipality.

The result is each town's share or percentage of the regional household income differences.

The most recent data on median household income and number of households by town are from the 2018 ACS 5-Year (Table S1901). This data for all towns is used in this methodology to calculate municipal shares (percentages) of differences in regional household incomes, i.e., the Household Income Difference Allocation Factor.

Step 5   Calculate the Poverty Allocation Factor

Connecticut law directs municipal zoning regulations to "…promote … economic diversity in housing, including housing for both low- and moderate-income households,"[50] yet some towns, compared with peers in their Housing Region, lack economic diversity. One readily available metric of economic diversity is the poverty rate by town, calculated by the U.S. Census Bureau. The poverty rate in this context is the percentage of a town's total population that is below the poverty threshold calculated annually by the U.S. Census Bureau.[51] Towns with a low poverty

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[50] CT Gen Stat §8-2.
[51] U.S. Census Bureau, "How the Census Bureau Measures Poverty," Website, https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html <accessed June 30, 2020> Note that the U.S. Census Bureau calculates the "poverty rate" based on the "Total Population for Whom Poverty Status Is Determined," which is fewer people in many towns than the total population estimated by its ACS. This fair share methodology calculates this Poverty Allocation Factor based on the total population by town to more accurately compare the differences in the extent of poverty among a region's towns.

rate and a high percentage of their population with incomes above the federal poverty threshold are not as economically diverse as towns with more moderate percentages of their population above the poverty threshold. This methodology establishes a higher poverty rate allocation factor for towns that have a lower poverty rate, compared with their regional peers.

The most recent data on the population by town with incomes below the poverty threshold, as defined by the U.S. Census Bureau, is 2018 ACS 5-Year (Table B17001).[52] This data for all towns is used in this methodology to calculate a town's share of the regional sum of the towns' percentages of population at or above the federal poverty threshold, the Poverty Allocation Factor.

Step 6   Calculate the Multifamily Housing Allocation Factor

Connecticut law directs municipal zoning regulations to

"…encourage opportunities for multifamily dwellings, … promote housing choice… and encourage the development of housing which will meet the housing needs identified in … the housing component and the other components of the state plan of conservation and development prepared pursuant to section 16a-26." [53]

The current "state plan of conservation and development," entitled *Conservation & Development Policies for Connecticut, 2013-2018*, and its successor, *Conservation & Development Policies for Connecticut, 2018-2023,* Revised Draft, contains an identical Growth Management Principle #2:

"Expand housing opportunities and design choices to accommodate a variety of household types and needs."[54]

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[52] For 2018, the U.S. Census Bureau defined the poverty threshold for a four-person household of two adults and two children at an annual income of $25,701. U.S. Census Bureau, "Poverty Thresholds," Website,
https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html
[53] CT Gen Stat §8-2.
[54] CT Office of Policy and Management, *Conservation & Development Policies for Connecticut, 2013-2018,* adopted June 5, 2013, page 12, and *Conservation & Development Policies for Connecticut, 2018-2023,* Revised Draft [no date, under consideration by the General Assembly in the 2020 legislative session], page 9, Website, https://portal.ct.gov/OPM/IGPP-MAIN/Responsible-Growth/Conservation-and-Development-Policies-Plan/Conservation-and-Development-Policies-Plan, <accessed May 27, 2020>

One readily available metric of the extent of "opportunities for multifamily dwellings" and the extent of "variety of housing types" that have been accommodated in compliance with this Growth Management Principle is the share of a town's housing stock that are multifamily housing units compared with other towns in the same region. The most recent data on existing multifamily housing units (2 or more units in a structure) by town, as defined by the U.S. Census Bureau,[55] is 2018 ACS 5-Year (Table B25032). This data for all towns is used in this methodology to calculate a town's share of the regional sum of the towns' multifamily housing units as percentages of total occupied housing units by region, the Multifamily Housing Allocation Factor.

Step 7   Calculate the Average Allocation Factor by Town

Next, the four allocation factors calculated in Step 3 through Step 6 are averaged by town to calculate the Average Allocation Factor by town.

Step 8   Calculate the Gross Fair Share by Town

Multiplying the Regional Current Need by a town's Average Allocation Factor yields a town's allocated Gross Fair Share of the Regional Current Need, i.e., needed new housing units affordable to lower income households.

In this manner, the statewide need of 137,304 affordable housing units calculated in Step 2 is allocated fairly, by Housing Region, initially to all 169 towns.

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[55] U.S. Census Bureau, American Housing Survey for the United States, 2017, Appendix A. Subject Definitions and Table Index,
 https://www2.census.gov/programs-surveys/ahs/2017/2017%20AHS%20Definitions.pdf <accessed June 30., 2020>

Step 9   Screen High Poverty Towns

The uneven distribution of affordable housing among Connecticut's towns, coupled with decades of exclusionary zoning and other exclusionary policies and practices, has resulted in the state's poor being concentrated in a small percentage of its 169 towns. For example, 42.8% of Connecticut's total poverty population live in only seven towns, which have only 17.7% of the state's total population. These seven towns, in descending rank of percent of total population in poverty, are: Hartford, New London, New Haven, Waterbury, Windham, New Britain, and Bridgeport. According to the most recent data from the U.S. Census Bureau, in 2018 a total of 348,449 persons in Connecticut lived in households below the poverty threshold, for a statewide average poverty rate of 9.73% of the total population.[56]

To limit a further concentration of poverty, and of affordable housing,[57] this fair share methodology screens out the seven highest-ranked "High Poverty" towns, defined as towns with poverty rates greater than 20%, which is significantly higher than the statewide average of 9.73%, and significantly higher than the eighth-ranked town, by a difference of 2.43%.   This screening out results in these seven towns having an Average Allocation Factor Post Poverty Rank Screening of zero (0.0) in the Model.

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[56] U.S. Census Bureau, 2018 ACS 5-Year, Table B17001 and Table B09019. Note that the Census Bureau ACS estimates by town the "Total Population for Whom Poverty Status is Determined," while this fair share methodology uses that data to calculate the percentage of the <u>total</u> population of a town that is below the poverty level.

[57] Connecticut has eight towns where more than 20% of the housing is counted as affordable housing under the Affordable Housing Land Use Appeals Act, CT Gen Stat 8-30g. Connecticut State Department of Housing, 2019 Affordable Housing Appeals List https://portal.ct.gov/-/media/DOH/2019-Appeals-List-for-online.pdf <accessed September 14, 2020> In six of the seven towns identified in this fair share methodology as High Poverty more than 20% of the housing stock is affordable housing.

Step 10 Identify the Average Allocation Factor Post Screening High Poverty Towns

Next, the Average Allocation Factor Post Screening High Poverty Towns is identified in a binary choice. It is either the Average Allocation Factor initially calculated in Step 7 for Housing Regions or zero for the seven High Poverty towns.

Step 11 Reallocate High Poverty Towns' Gross Fair Share by Calculating the Reallocated Average Allocation Factor Post Poverty Rank Screening

The Gross Fair Shares of the seven High Poverty towns, totaling 6,342 units or 4.6% of the total statewide, do not disappear in the Model. Instead, these Gross Fair Shares are pooled and reallocated within each of the five Housing Regions that host one or more of the High Poverty towns. This reallocation takes place in the calculation of the Reallocated Average Allocation Factor Post Poverty Rank Screening. For each town, its Average Allocation Factor Post Poverty Rank Screening, calculated in Step 10, is divided by the sum of its Housing Region's total of Average Allocation Factors Post Poverty Rank Screening, to yield its Reallocated Average Allocation Factor Post Poverty Rank Screening.

Step 12 Calculate the Gross Fair Share by Town Post High Poverty Town Screening

Next, the Gross Municipal Fair Share is recalculated for the towns in a Housing Region with one of more of the High Poverty Towns, by multiplying the Regional Fair Share calculated in Step 2 by the Reallocated Average Allocation Factor Post Poverty Rank Screening calculated in Step 11. For Housing Regions with no High Poverty Towns, there is no change in the Gross Municipal Fair Share.

Step 13 Calculate Transition Adjustment Factor

Towns should prepare, propose for public scrutiny and input, adopt, implement, and periodically review, update, and amend municipal plans to satisfy their Fair Share through zoning changes, new construction of affordable housing, and other mechanisms. As Connecticut's current affordable housing crisis and segregated landscape has developed over decades, the Municipal Fair Share is viewed generally as a ten-year goal, but some towns may need more time to take the steps necessary to accommodate their Fair Share responsibility.

To that end, this fair share methodology provides for a Transition Adjustment Factor, defined as 20% of the occupied housing in a town, as a ceiling for fair share units allocated to a municipality for an initial ten-year implementation-compliance period. The Model adjusts the Fair Share for the first decade, for 2020-2030, to the level of the Transition Adjustment Factor. Connecticut's housing needs should be reassessed and Fair Share responsibilities reallocated based on updated data before the end of the first decade.

Step 14 Calculate the Fair Share by Town

The final step in this fair share methodology is to calculate the Fair Share of all towns. For the seven highest ranking towns by % poverty population, there is no allocation, to avoid a further concentration of poverty. For the 48 towns that qualify for the Transition Adjustment Factor, the Fair Share is the Gross Fair Share Post Poverty Rank Screening adjusted downward to the level of the calculated Transition Adjustment Factor. For the remaining 114 towns, the Fair Share is either the Gross Fair Share or, if in a Housing Region with one of more of the seven High Poverty towns, the Gross Fair Share Post Poverty Rank Screening.

The statewide total of the Fair Share of towns, allocated on a regional basis, pooled and reallocated after screening out High Poverty towns, and adjusted using a Transition Adjustment Factor, is 120,776 affordable housing units.

CONCLUSION

This Open Communities Alliance Fair Share Model for Connecticut assesses affordable housing need realistically and pragmatically by Housing Region, and then allocates fairly that need to all towns in each Housing Region. After screening out High Poverty Towns, reallocating their Fair Shares, and applying a Transition Adjustment Factor, the Model results in a statewide total allocated and adjusted Fair Share of 120,776 affordable housing units as of 2020.   Figure 7 presents these allocations by Housing Region:

Figure 7: Connecticut Fair Share Allocations by Housing Region, 2020

Connecticut Fair Share Allocations by Housing Region, 2020		
Housing Region	Gross Regional Fair Share (units)	Regional Fair Share, Post Poverty Rank Screening, Reallocation, and Transition Adjustment Factor (affordable housing units)
Capital	36,498	33,844
Lower CT River Valley	5,283	5,251
Metropolitan + Western Combined	35,365	29,574
Naugatuck Valley	17,822	16,265
Northeast CT	2,750	2,669
Northwest Hills	3,498	3,396
South Central CT	25,889	20,843
Southeastern	10,200	8,934
CONNECTICUT	137,305	120,776
Source: OCA Fair Share Model, Tab Fair Share Allocations by Towns Prepared by David N. Kinsey, PhD, FAICP, November 11, 2020, revised May 27, 2021		

Appendix A presents the Fair Share for each of the 169 towns in Connecticut, alphabetically and by Housing Region.   Across the state, the Fair Share of towns, not including the High Poverty Towns, ranges from 97 affordable housing units for North Canaan to 3,383 affordable housing units for Greenwich.

As updated data on population, estimated households, lower income households, cost-burdened households, household income, poverty, ratables, multifamily housing, and other inputs to the Model become available, the Model can be easily updated. The Model (v2 5-17-21) and all the data used in the calculations of Fair Share are available in an Excel workbook at this link [https://www.ctoca.org/fairshare].

Summary of Connecticut Fair Share Housing Allocations by Towns, 2020 (affordable housing units)					
by Housing Regions			Alphabetically		
Town	Gross Municipal Fair Share	Fair Share	Town	Gross Municipal Fair Share	Fair Share
Capitol Region					
Andover	776	236	Andover	776	236
Avon	1,274	1,274	Ansonia	642	642
Berlin	1,104	1,104	Ashford	132	132
Bloomfield	996	996	Avon	1,274	1,274
Bolton	813	316	Barkhamsted	180	180
Canton	839	839	Beacon Falls	770	537
Columbia	851	434	Berlin	1,104	1,104
Coventry	908	908	Bethany	1,638	427
East Granby	788	442	Bethel	1,086	1,086
East Hartford	956	956	Bethlehem	800	264
East Windsor	755	755	Bloomfield	996	996
Ellington	872	872	Bolton	813	316
Enfield	1,161	1,161	Bozrah	444	199
Farmington	1,254	1,254	Branford	1,856	1,856
Glastonbury	1,550	1,550	Bridgeport	-	-
Granby	996	803	Bridgewater	1,009	126
Hartford	-	-	Bristol	1,354	1,354
Hebron	925	727	Brookfield	1,124	1,124
Manchester	1,264	1,264	Brooklyn	188	188
Mansfield	625	625	Burlington	304	304
Marlborough	867	503	Canaan	114	114
New Britain	-	-	Canterbury	209	209
Newington	1,107	1,107	Canton	839	839
Plainville	779	779	Chaplin	127	127
Rocky Hill	938	938	Cheshire	1,489	1,489
Simsbury	1,262	1,262	Chester	242	242
Somers	913	873	Clinton	296	296
South Windsor	1,422	1,422	Colchester	696	696
Southington	1,294	1,294	Colebrook	129	117
Stafford	743	743	Columbia	851	434
Suffield	1,021	1,021	Cornwall	130	103
Tolland	1,039	1,039	Coventry	908	908
Vernon	821	821	Cromwell	355	355
West Hartford	1,905	1,905	Danbury	1,297	1,297
Wethersfield	1,064	1,064	Darien	1,911	1,271
Willington	630	570	Deep River	191	191
Windsor	1,165	1,165	Derby	599	599
Windsor Locks	821	821	Durham	357	357
Lower CT River Valley Region			East Granby	788	442
Chester	242	242	East Haddam	303	303
Clinton	296	296	East Hampton	381	381
Cromwell	355	355	East Hartford	956	956
Deep River	191	191	East Haven	1,404	1,404
Durham	357	357	East Lyme	800	800
East Haddam	303	303	East Windsor	755	755
East Hampton	381	381	Eastford	151	151

Summary of Connecticut Fair Share Housing Allocations by Towns, 2020 (affordable housing units)

by Housing Regions			Alphabetically		
Town	Gross Municipal Fair Share	Fair Share	Town	Gross Municipal Fair Share	Fair Share
Essex	280	280	Easton	1,209	529
Haddam	357	357	Ellington	872	872
Killingworth	340	340	Enfield	1,161	1,161
Lyme	263	231	Essex	280	280
Middlefield	258	258	Fairfield	2,064	2,064
Middletown	360	360	Farmington	1,254	1,254
Old Lyme	346	346	Franklin	454	144
Old Saybrook	356	356	Glastonbury	1,550	1,550
Portland	292	292	Goshen	168	168
Westbrook	309	309	Granby	996	803
Metropolitan & Western Regions Combined			Greenwich	3,304	3,304
Bethel	1,086	1,086	Griswold	436	436
Bridgeport	-	-	Groton	937	937
Bridgewater	1,009	126	Guilford	2,100	1,671
Brookfield	1,124	1,124	Haddam	357	357
Danbury	1,297	1,297	Hamden	1,954	1,954
Darien	1,911	1,271	Hampton	133	133
Easton	1,209	529	Hartford	-	-
Fairfield	2,064	2,064	Hartland	140	140
Greenwich	3,304	3,304	Harwinton	203	203
Monroe	1,211	1,198	Hebron	925	727
New Canaan	1,775	1,350	Kent	120	120
New Fairfield	1,154	863	Killingly	207	207
New Milford	1,105	1,105	Killingworth	340	340
Newtown	1,364	1,364	Lebanon	553	533
Norwalk	1,738	1,738	Ledyard	651	651
Redding	1,120	700	Lisbon	490	343
Ridgefield	1,558	1,558	Litchfield	190	190
Sherman	1,076	258	Lyme	263	231
Stamford	2,443	2,443	Madison	1,995	1,397
Stratford	1,201	1,201	Manchester	1,264	1,264
Trumbull	1,474	1,474	Mansfield	625	625
Weston	1,517	600	Marlborough	867	503
Westport	2,070	1,808	Meriden	1,530	1,530
Wilton	1,555	1,113	Middlebury	993	608
Naugatuck Valley Region			Middlefield	258	258
Ansonia	642	642	Middletown	360	360
Beacon Falls	770	537	Milford	2,670	2,670
Bethlehem	800	264	Monroe	1,211	1,198
Bristol	1,354	1,354	Montville	603	603
Cheshire	1,489	1,489	Morris	144	144
Derby	599	599	Naugatuck	935	935
Middlebury	993	608	New Britain	-	-
Naugatuck	935	935	New Canaan	1,775	1,350
Oxford	1,145	1,096	New Fairfield	1,154	863
Plymouth	827	827	New Hartford	203	203
Prospect	962	659	New Haven	-	-

Summary of Connecticut Fair Share Housing Allocations by Towns, 2020 (affordable housing units)					
by Housing Regions			Alphabetically		
Town	Gross Municipal Fair Share	Fair Share	Town	Gross Municipal Fair Share	Fair Share
Seymour	837	837	New London	-	-
Shelton	1,798	1,798	New Milford	1,105	1,105
Southbury	1,158	1,158	Newington	1,107	1,107
Thomaston	676	624	Newtown	1,364	1,364
Waterbury	-	-	Norfolk	111	111
Watertown	1,018	1,018	North Branford	1,513	1,063
Wolcott	982	982	North Canaan	97	97
Woodbury	838	838	North Haven	1,967	1,812
Northeast CT Region			North Stonington	485	394
Ashford	132	132	Norwalk	1,738	1,738
Brooklyn	188	188	Norwich	569	569
Canterbury	209	209	Old Lyme	346	346
Chaplin	127	127	Old Saybrook	356	356
Eastford	151	151	Orange	1,909	1,006
Hampton	133	133	Oxford	1,145	1,096
Killingly	207	207	Plainfield	217	217
Plainfield	217	217	Plainville	779	779
Pomfret	166	166	Plymouth	827	827
Putnam	136	136	Pomfret	166	166
Scotland	152	142	Portland	292	292
Sterling	155	155	Preston	464	369
Thompson	229	229	Prospect	962	659
Union	147	76	Putnam	136	136
Voluntown	140	140	Redding	1,120	700
Woodstock	262	262	Ridgefield	1,558	1,558
Northwest Hills Region			Rocky Hill	938	938
Barkhamsted	180	180	Roxbury	214	186
Burlington	304	304	Salem	542	311
Canaan	114	114	Salisbury	198	198
Colebrook	129	117	Scotland	152	142
Cornwall	130	103	Seymour	837	837
Goshen	168	168	Sharon	150	150
Hartland	140	140	Shelton	1,798	1,798
Harwinton	203	203	Sherman	1,076	258
Kent	120	120	Simsbury	1,262	1,262
Litchfield	190	190	Somers	913	873
Morris	144	144	South Windsor	1,422	1,422
New Hartford	203	203	Southbury	1,158	1,158
Norfolk	111	111	Southington	1,294	1,294
North Canaan	97	97	Sprague	354	225
Roxbury	214	186	Stafford	743	743
Salisbury	198	198	Stamford	2,443	2,443
Sharon	150	150	Sterling	155	155
Torrington	199	199	Stonington	796	796
Warren	164	131	Stratford	1,201	1,201
Washington	208	208	Suffield	1,021	1,021
Winchester	130	130	Thomaston	676	624

Summary of Connecticut Fair Share Housing Allocations by Towns, 2020 (affordable housing units)

by Housing Regions			Alphabetically		
Town	Gross Municipal Fair Share	Fair Share	Town	Gross Municipal Fair Share	Fair Share
South Central Region			Thompson	229	229
Bethany	1,638	427	Tolland	1,039	1,039
Branford	1,856	1,856	Torrington	199	199
East Haven	1,404	1,404	Trumbull	1,474	1,474
Guilford	2,100	1,671	Union	147	76
Hamden	1,954	1,954	Vernon	821	821
Madison	1,995	1,397	Voluntown	140	140
Meriden	1,530	1,530	Wallingford	2,082	2,082
Milford	2,670	2,670	Warren	164	131
New Haven	-	-	Washington	208	208
North Branford	1,513	1,063	Waterbury	-	-
North Haven	1,967	1,812	Waterford	926	926
Orange	1,909	1,006	Watertown	1,018	1,018
Wallingford	2,082	2,082	West Hartford	1,905	1,905
West Haven	1,428	1,428	West Haven	1,428	1,428
Woodbridge	1,842	542	Westbrook	309	309
Southeastern CT Region			Weston	1,517	600
Bozrah	444	199	Westport	2,070	1,808
Colchester	696	696	Wethersfield	1,064	1,064
East Lyme	800	800	Willington	630	570
Franklin	454	144	Wilton	1,555	1,113
Griswold	436	436	Winchester	130	130
Groton	937	937	Windham	-	-
Lebanon	553	533	Windsor	1,165	1,165
Ledyard	651	651	Windsor Locks	821	821
Lisbon	490	343	Wolcott	982	982
Montville	603	603	Woodbridge	1,842	542
New London	-	-	Woodbury	838	838
North Stonington	485	394	Woodstock	262	262
Norwich	569	569	Source: OCA Fair Share Model		
Preston	464	369			
Salem	542	311			
Sprague	354	225			
Stonington	796	796			
Waterford	926	926			
Windham	-	-			
Source: OCA Fair Share Model					