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March 15, 2021

Joan Veley, Chairwoman
Planning & Zoning Commission
Town of Berlin, Town Hall
240 Kensington Road
Berlin, CT 06037

Re: Third-Party Review – Applicant Proposed Housing Affordability Plan

Dear Chairwoman, Veley:

Per a request by staff, I have revisited the proposed Housing Affordability Plan submitted by the applicant. The request to revisit the Plan resulted from further remarks and concerns raised by Doug Truitt in a memo dated March 2, 2021. In that memo, Mr. Truitt explains, "The 404 Berlin Turnpike proposal is out of compliance" in two ways. He continued to explain:

> 1) In section VIII, Maximum Rental Price, the proposal states that "a studio apartment is calculated as a one bedroom unit". This is in direct contradiction of 8-30g-8 which stipulates that rent for a studio apartment is calculated at one person occupancy, a 1-bedroom at 1.5 person occupancy, and a 2-bedroom at 3 person occupancy.
>
> 2) The sample rent calculation in the same section does not implement the formula defined in 8-30g-8, and arrives at a maximum rent allowance significantly larger than would be calculated by applying the method defined in the regulations.

I agree with Mr. Truitt's findings and believe the Plan calculations need to be more specific as to the number of persons per household, the income limits per household size, and the unit types (number of bedrooms). Therefore, to resolve this matter and ensure compliance I recommend the following changes to the Housing Affordability Plan:

- Modify the 'Sample Calculation Table' in Section VIII (Maximum Rental Price) to provide sample calculations for each of the three unit types. The table can be presented with three columns for each of the unit types: Studio, One-Bedroom, and Two-Bedroom.
- The studio unit column should be calculated for a 1-person household at the applicable income limits provided via HUD and the State Department of Housing.
- The one-bedroom u unit column should be calculated for a 1.5-person household at the applicable income limits provided via HUD and the State Department of Housing.
- The two-bedroom unit column should be calculated for a 3-person household at the applicable income limits provided via HUD and the State Department of Housing.

With this memo, I have provided files containing the most recent year income limits by household size and rent limits for the most recent year (2020), as provided by HUD and the State Department of

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Housing. By utilizing these numbers and providing the specific calculations for each of the unit types by the number of persons and the applicable incomes limits, the applicant can resolve this issue.

I also recommend that language be added to Section VIII. Maximum Rental Price explaining that the calculations (moving forward) be based on the most recent year income limits for the Hartford-West Hartford-East MSA (or statewide) as updated by HUD and the State Department of Housing.

I look forward to discussing this with you and the Commission further at the next hearing. Please feel free to ask any questions you or the Commission may have.

Respectfully submitted,

Donald J. Poland, PhD, AICP
Planning Consultant

DOH Program Rent Limits based on HUD FMRs
2020 HUD FMRs (effective 9/2020)
PMSA/MSA area

		Bedroom Size						
		0	1	2	3	4	5	6
Bridgeport-Stamford-Norwalk MSA								
Bridgeport	FMR	878	1,077	1,346	1,706	2,114	2,431	2,748
	25% Rent Limit	449	481	578	667	744	821	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	878	962	1,155	1,334	1,488	1,642	1,795
	HIGH HOME Rent	878	1,077	1,346	1,700	1,878	2,053	2,229
	50% LIHTC and State Bond Fund	898	962	1,155	1,334	1,488	1,642	1,795
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,878	2,053	2,229
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	1,098	1,346	1,683	2,133	2,643	3,039	3,435
	120% Housing Trust Fund	1,317	1,616	2,019	2,559	3,171	3,647	4,122
Danbury	FMR	1,140	1,360	1,749	2,187	2,680	3,082	3,484
	25% Rent Limit	509	546	654	756	844	931	
	30% Rent Limit (S811 PRA/NHTF)	641	686	823	951	1,062	1,171	1,284
	LOW HOME Rent	1,067	1,143	1,372	1,586	1,770	1,952	2,135
	HIGH HOME Rent	1,140	1,360	1,744	2,007	2,220	2,431	2,642
	50% LIHTC and State Bond Fund	1,018	1,091	1,308	1,512	1,687	1,861	
	60% LIHTC and State Bond Fund	1,222	1,309	1,570	1,815	2,025	2,234	
	65% Rent Limit (HUD)	1,354	1,452	1,744	2,007	2,220	2,431	2,642
	100% FLEXIBLE Program	1,425	1,700	2,186	2,734	3,350	3,853	4,355
	120% Housing Trust Fund	1,710	2,040	2,624	3,281	4,020	4,623	5,226
Stamford Norwalk	FMR	1,356	1,701	2,079	2,616	2,926	3,365	3,804
	25% Rent Limit	591	633	759	877	978	1,079	
	30% Rent Limit (S811 PRA/NHTF)	752	806	967	1,118	1,247	1,376	1,505
	LOW HOME Rent	1,263	1,353	1,623	1,876	2,092	2,309	2,525
	HIGH HOME Rent	1,356	1,458	1,752	2,015	2,229	2,441	2,652
	50% LIHTC and State Bond Fund	1,181	1,265	1,518	1,753	1,956	2,158	
	60% LIHTC and State Bond Fund	1,417	1,518	1,822	2,104	2,347	2,590	
	65% Rent Limit (HUD)	1,360	1,458	1,752	2,015	2,229	2,441	2,652
	100% FLEXIBLE Program	1,695	2,126	2,599	3,270	3,658	4,206	4,755
	120% Housing Trust Fund	2,034	2,552	3,119	3,924	4,389	5,048	5,706
Hartford-West Hartford-East Hartford MSA								
Hartford-West/East Hartford	FMR	801	993	1,230	1,533	1,757	2,021	2,284
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	801	962	1,155	1,334	1,488	1,642	1,795
	HIGH HOME Rent	801	993	1,230	1,533	1,757	2,021	2,229
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	

	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	1,001	1,241	1,538	1,916	2,196	2,526	2,855
	120% Housing Trust Fund	1,202	1,490	1,845	2,300	2,636	3,032	3,426

Evonne M. Klein
Commissioner

PMSA/MSA area

		Bedroom Size						
		0	1	2	3	4	5	6
Southern Middlesex County	FMR	944	1,100	1,449	2,090	2,544	2,926	3,307
	25% Rent Limit	475	509	611	705	787	868	
	30% Rent Limit (S811 PRA/NHTF)	588	630	756	873	975	1,076	1,176
	LOW HOME Rent	944	1,050	1,260	1,456	1,625	1,792	1,960
	HIGH HOME Rent	944	1,100	1,449	1,942	2,148	2,351	2,554
	50% LIHTC and State Bond Fund	950	1,017	1,221	1,410	1,573	1,736	
	60% LIHTC and State Bond Fund	1,140	1,221	1,465	1,692	1,888	2,084	
	65% Rent Limit (HUD)	1,310	1,405	1,688	1,942	2,148	2,351	2,554
	100% FLEXIBLE Program	1,180	1,375	1,811	2,613	3,180	3,658	4,134
	120% Housing Trust Fund	1,416	1,650	2,174	3,135	3,816	4,389	4,961
New Haven-Milford MSA								
Milford-Ansonia-Seymour	FMR	897	1,118	1,376	1,715	2,143	2,464	2,786
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	568	609	731	843	941	1,038	1,135
	LOW HOME Rent	897	1,015	1,217	1,406	1,570	1,731	1,893
	HIGH HOME Rent	897	1,118	1,376	1,715	1,984	2,170	2,356
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,211	1,299	1,562	1,795	1,989	2,170	2,356
	100% FLEXIBLE Program	1,121	1,398	1,720	2,144	2,679	3,080	3,483
	120% Housing Trust Fund	1,346	1,677	2,064	2,573	3,215	3,696	4,179
New Haven-Meriden	FMR	1,042	1,162	1,407	1,775	2,008	2,309	2,610
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	898	962	1,155	1,334	1,488	1,642	1,795
	HIGH HOME Rent	1,042	1,162	1,407	1,700	1,878	2,053	2,229
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	1,303	1,453	1,759	2,219	2,510	2,886	3,263
	120% Housing Trust Fund	1,563	1,743	2,111	2,663	3,012	3,464	3,915
Waterbury	FMR	729	906	1,119	1,394	1,573	1,809	2,045
	25% Rent Limit	424	454	545	629	702	775	

30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
LOW HOME Rent	729	906	1,119	1,334	1,488	1,642	1,795
HIGH HOME Rent	729	906	1,119	1,394	1,573	1,809	2,045
50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
100% FLEXIBLE Program	911	1,133	1,399	1,743	1,966	2,261	2,556
120% Housing Trust Fund	1,094	1,359	1,679	2,091	2,360	2,714	3,068

PMSA/MSA area

		Bedroom Size						
		0	1	2	3	4	5	6
Norwich-New London MSA								
Colchester-Lebanon	FMR	838	969	1232	1777	2014	2316	2618
	25% Rent Limit	483	517	620	717	799	882	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	838	969	1232	1495	1667	1,840	2012
	HIGH HOME Rent	838	969	1232	1777	2014	2,316	2554
	50% LIHTC and State Bond Fund	965	1,033	1,240	1,433	1,598	1,763	
	60% LIHTC and State Bond Fund	1,158	1,240	1,488	1,719	1,918	2,116	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	1,019	1,173	1,489	1,928	2,385	2,743	3,100
	120% Housing Trust Fund	1,223	1,407	1,787	2,313	2,862	3,291	3,720
Norwich-New London	FMR	815	938	1,191	1,542	1,908	2,194	2,480
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	815	938	1155	1334	1488	1642	1795
	HIGH HOME Rent	815	938	1191	1542	1878	2053	2229
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	1,019	1,173	1,489	1,928	2,385	2,743	3,100
	120% Housing Trust Fund	1,223	1,407	1,787	2,313	2,862	3,291	3,720
County Parts								
Litchfield County	FMR	770	916	1,180	1,502	1,599	1,839	2,079
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	770	916	1,155	1,334	1,488	1,642	1,795
	HIGH HOME Rent	770	916	1,180	1,502	1,599	1,839	2,079
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	963	1,145	1,475	1,878	1,999	2,299	2,599

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	120% Housing Trust Fund	1,155	1,374	1,770	2,253	2,399	2,759	3,119
Windham County	FMR	787	811	1,020	1,304	1,571	1,807	2,042
	25% Rent Limit	424	454	545	629	702	775	
	30% Rent Limit (S811 PRA/NHTF)	540	578	693	801	893	986	1,078
	LOW HOME Rent	787	811	1,020	1,304	1,488	1,642	1,795
	HIGH HOME Rent	787	811	1,020	1,304	1,571	1,807	2,042
	50% LIHTC and State Bond Fund	847	908	1,090	1,258	1,403	1,549	
	60% LIHTC and State Bond Fund	1,017	1,089	1,308	1,510	1,684	1,859	
	65% Rent Limit (HUD)	1,148	1,231	1,479	1,700	1,878	2,053	2,229
	100% FLEXIBLE Program	984	1,014	1,275	1,630	1,964	2,259	2,553
	120% Housing Trust Fund	1,181	1,217	1,530	1,956	2,357	2,711	3,063

DOH Development Program Income Limits based on HUD Median Incomes

2020 Income Limits (Revised 9/16/2020)

PMSA/MSA Area		Household Size							
		1	2	3	4	5	6	7	8
Bridgeport-Stamford-Norwalk MSA									
Bridgeport - HMFA	25% of AMI	$ 17,150	$ 19,600	$ 22,050	$ 24,500	$ 26,460	$ 28,420	$ 30,380	$ 32,340
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 47,100
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,460	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,550	$ 63,650	$ 67,750
	50% of AMI	$ 34,300	$ 39,200	$ 44,100	$ 49,000	$ 52,920	$ 56,840	$ 60,760	$ 64,680
	60% of AMI	$ 43,140	$ 49,260	$ 55,440	$ 61,560	$ 66,540	$ 71,460	$ 76,380	$ 81,300
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 54,880	$ 62,720	$ 70,560	$ 78,400	$ 84,672	$ 90,944	$ 97,216	$ 103,488
	100% of AMI (AHP)	$ 68,600	$ 78,400	$ 88,200	$ 98,000	$ 105,840	$ 113,680	$ 121,520	$ 129,360
	110% of AMI (ECL)	$ 75,460	$ 86,240	$ 97,020	$ 107,800	$ 116,424	$ 125,048	$ 133,672	$ 142,296
	120% of AMI (HTF)	$ 82,320	$ 94,080	$ 105,840	$ 117,600	$ 127,008	$ 136,416	$ 145,824	$ 155,232
Danbury - HMFA	25% of AMI	$ 21,350	$ 24,400	$ 27,450	$ 30,500	$ 32,940	$ 35,380	$ 37,820	$ 40,260
	30% of AMI - HOME/CDBG	$ 25,650	$ 29,300	$ 32,950	$ 36,600	$ 39,550	$ 42,500	$ 45,400	$ 48,350
	30% of AMI (NHTF)	$ 25,650	$ 29,300	$ 32,950	$ 36,600	$ 39,550	$ 42,500	$ 45,400	$ 48,350
	Very Low Income - HOME/CDBG	$ 42,700	$ 48,800	$ 54,900	$ 61,000	$ 65,900	$ 70,800	$ 75,650	$ 80,550
	50% of AMI	$ 42,700	$ 48,800	$ 54,900	$ 61,000	$ 65,880	$ 70,760	$ 75,640	$ 80,520
	60% of AMI	$ 51,240	$ 58,560	$ 65,880	$ 73,200	$ 79,080	$ 84,960	$ 90,780	$ 96,600
	Low Income - HOME/CDBG	$ 57,050	$ 65,200	$ 73,350	$ 81,500	$ 88,050	$ 94,550	$ 101,100	$ 107,600
	80% of AMI	$ 68,320	$ 78,080	$ 87,840	$ 97,600	$ 105,408	$ 113,216	$ 121,024	$ 128,832
	100% of AMI (AHP)	$ 85,400	$ 97,600	$ 109,800	$ 122,000	$ 131,760	$ 141,520	$ 151,280	$ 161,040
	110% of AMI (ECL)	$ 93,940	$ 107,360	$ 120,780	$ 134,200	$ 144,936	$ 155,672	$ 166,408	$ 177,144
	120% of AMI (HTF)	$ 102,480	$ 117,120	$ 131,760	$ 146,400	$ 158,112	$ 169,824	$ 181,536	$ 193,248
Stamford-Norwalk - HMFA	25% of AMI	$ 25,095	$ 28,680	$ 32,265	$ 35,850	$ 38,718	$ 41,586	$ 44,454	$ 47,322
	30% of AMI - HOME/CDBG	$ 30,100	$ 34,400	$ 38,700	$ 43,000	$ 46,450	$ 49,900	$ 53,350	$ 56,800
	30% of AMI (NHTF)	$ 30,100	$ 34,400	$ 38,700	$ 43,000	$ 46,450	$ 49,900	$ 53,350	$ 56,800
	Very Low Income - HOME/CDBG	$ 50,200	$ 57,400	$ 64,550	$ 71,700	$ 77,450	$ 83,200	$ 88,950	$ 94,650
	50% of AMI	$ 50,190	$ 57,360	$ 64,530	$ 71,700	$ 77,436	$ 83,172	$ 88,908	$ 94,644
	60% of AMI	$ 60,240	$ 68,880	$ 77,460	$ 86,040	$ 92,940	$ 99,840	$ 106,740	$ 113,580
	Low Income - HOME/CDBG	$ 66,500	$ 76,000	$ 85,500	$ 95,000	$ 102,600	$ 110,200	$ 117,800	$ 125,400
	80% of AMI	$ 80,304	$ 91,776	$ 103,248	$ 114,720	$ 123,898	$ 133,075	$ 142,253	$ 151,430
	100% of AMI (AHP)	$ 100,380	$ 114,720	$ 129,060	$ 143,400	$ 154,872	$ 166,344	$ 177,816	$ 189,288
	110% of AMI (ECL)	$ 110,418	$ 126,192	$ 141,966	$ 157,740	$ 170,359	$ 182,978	$ 195,598	$ 208,217
	120% of AMI (HTF)	$ 120,456	$ 137,664	$ 154,872	$ 172,080	$ 185,846	$ 199,613	$ 213,379	$ 227,146
Hartford-West Hartford-East Hartford MSA									
Hartford - West/East Hartford - HMFA	25% of AMI	$ 17,045	$ 19,480	$ 21,915	$ 24,350	$ 26,298	$ 28,246	$ 30,194	$ 32,142
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 55,450	$ 59,550	$ 59,550	$ 63,650	$ 67,750
	50% of AMI	$ 34,090	$ 38,960	$ 43,830	$ 48,700	$ 52,596	$ 56,492	$ 60,388	$ 64,284
	60% of AMI	$ 43,140	$ 49,260	$ 55,440	$ 61,560	$ 66,540	$ 71,460	$ 76,380	$ 81,300
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 54,544	$ 62,336	$ 70,128	$ 77,920	$ 84,154	$ 90,387	$ 96,621	$ 102,854

DOH Development Program Income Limits based on HUD Median Incomes

2020 Income Limits (Revised 9/16/2020)

PMSA/MSA Area		Household Size 1	2	3	4	5	6	7	8
	100% of AMI (AHP)	$ 68,180	$ 77,920	$ 87,660	$ 97,400	$ 105,192	$ 112,984	$ 120,776	$ 128,568
	110% of AMI (ECL)	$ 74,998	$ 85,712	$ 96,426	$ 107,140	$ 115,711	$ 124,282	$ 132,854	$ 141,425
	120% of AMI (HTF)	$ 81,816	$ 93,504	$ 105,192	$ 116,880	$ 126,230	$ 135,581	$ 144,931	$ 154,282
Southern Middlesex County - HMFA	25% of AMI	$ 19,600	$ 22,400	$ 25,200	$ 28,000	$ 30,240	$ 32,480	$ 34,720	$ 36,960
	30% of AMI - HOME/CDBG	$ 23,550	$ 26,900	$ 30,250	$ 33,600	$ 36,300	$ 39,000	$ 41,700	$ 44,400
	30% of AMI (NHTF)	$ 23,300	$ 26,600	$ 29,950	$ 33,250	$ 35,950	$ 38,600	$ 41,250	$ 43,900
	Very Low Income - HOME/CDBG	$ 39,200	$ 44,800	$ 50,400	$ 56,000	$ 65,000	$ 69,450	$ 69,450	$ 73,950
	50% of AMI	$ 39,200	$ 44,800	$ 50,400	$ 56,000	$ 60,480	$ 64,960	$ 69,440	$ 73,920
	60% of AMI	$ 47,040	$ 53,760	$ 60,480	$ 67,200	$ 72,576	$ 77,952	$ 83,328	$ 88,704
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 62,720	$ 71,680	$ 80,640	$ 89,600	$ 96,768	$ 103,936	$ 111,104	$ 118,272
	100% of AMI (AHP)	$ 78,400	$ 89,600	$ 100,800	$ 112,000	$ 120,960	$ 129,920	$ 138,880	$ 147,840
	110% of AMI (ECL)	$ 86,240	$ 98,560	$ 110,880	$ 123,200	$ 133,056	$ 142,912	$ 152,768	$ 162,624
	120% of AMI (HTF)	$ 94,080	$ 107,520	$ 120,960	$ 134,400	$ 145,152	$ 155,904	$ 166,656	$ 177,408
New Haven-Milford MSA									
Milford-Ansonia-Seymour - HMFA	25% of AMI	$ 18,935	$ 21,640	$ 24,345	$ 27,050	$ 29,214	$ 31,378	$ 33,542	$ 35,706
	30% of AMI - HOME/CDBG	$ 22,750	$ 26,000	$ 29,250	$ 32,450	$ 35,050	$ 37,650	$ 40,250	$ 42,850
	30% of AMI (NHTF)	$ 22,050	$ 25,200	$ 28,350	$ 31,450	$ 34,000	$ 36,500	$ 39,010	$ 43,430
	Very Low Income - HOME/CDBG	$ 37,900	$ 43,300	$ 48,700	$ 54,100	$ 58,450	$ 62,800	$ 67,100	$ 71,450
	50% of AMI	$ 37,870	$ 43,280	$ 48,690	$ 54,100	$ 58,428	$ 62,756	$ 67,084	$ 71,412
	60% of AMI	$ 45,480	$ 51,960	$ 58,440	$ 64,920	$ 70,140	$ 75,360	$ 80,520	$ 85,740
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 60,592	$ 69,248	$ 77,904	$ 86,560	$ 93,485	$ 100,410	$ 107,334	$ 114,259
	100% of AMI (AHP)	$ 75,740	$ 86,560	$ 97,380	$ 108,200	$ 116,856	$ 125,512	$ 134,168	$ 142,824
	110% of AMI (ECL)	$ 83,314	$ 95,216	$ 107,118	$ 119,020	$ 128,542	$ 138,063	$ 147,585	$ 157,106
	120% of AMI (HTF)	$ 90,888	$ 103,872	$ 116,856	$ 129,840	$ 140,227	$ 150,614	$ 161,002	$ 171,389
New Haven-Meriden - HMFA	25% of AMI	$ 15,960	$ 18,240	$ 20,520	$ 22,800	$ 24,624	$ 26,448	$ 28,272	$ 30,096
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,550	$ 63,650	$ 67,750
	50% of AMI	$ 31,920	$ 36,480	$ 41,040	$ 45,600	$ 49,248	$ 52,896	$ 56,544	$ 60,192
	60% of AMI	$ 43,140	$ 49,260	$ 55,440	$ 61,560	$ 66,540	$ 71,460	$ 76,380	$ 84,300
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 76,050	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 51,072	$ 58,368	$ 65,664	$ 72,960	$ 78,797	$ 84,634	$ 90,470	$ 96,307
	100% of AMI (AHP)	$ 63,840	$ 72,960	$ 82,080	$ 91,200	$ 98,496	$ 105,792	$ 113,088	$ 120,384
	110% of AMI (ECL)	$ 70,224	$ 80,256	$ 90,288	$ 100,320	$ 108,346	$ 116,371	$ 124,397	$ 132,422
	120% of AMI (HTF)	$ 76,608	$ 87,552	$ 98,496	$ 109,440	$ 118,195	$ 126,950	$ 135,706	$ 144,461
Waterbury - HMFA	25% of AMI	$ 14,053	$ 16,060	$ 18,068	$ 20,075	$ 21,681	$ 23,287	$ 24,893	$ 26,499
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,550	$ 63,650	$ 67,750
	50% of AMI	$ 28,105	$ 32,120	$ 36,135	$ 40,150	$ 43,362	$ 46,574	$ 49,786	$ 52,998

DOH Development Program Income Limits based on HUD Median Incomes

2020 Income Limits (Revised 9/16/2020)

PMSA/MSA Area

	Household Size							
	1	2	3	4	5	6	7	8
60% of AMI	$ 43,140	$ 49,260	$ 55,440	$ 61,560	$ 66,540	$ 71,460	$ 76,380	$ 81,300
Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
80% of AMI	$ 44,968	$ 51,392	$ 57,816	$ 64,240	$ 69,379	$ 74,518	$ 79,658	$ 84,797
100% of AMI (AHP)	$ 56,210	$ 64,240	$ 72,270	$ 80,300	$ 86,724	$ 93,148	$ 99,572	$ 105,996

DOH Development Program Income Limits based on HUD Median Incomes

2020 Income Limits (Revised 9/16/2020)

PMSA/MSA Area		Household Size 1	2	3	4	5	6	7	8
	110% of AMI (ECL)	$ 61,831	$ 70,664	$ 79,497	$ 88,330	$ 95,396	$ 102,463	$ 109,529	$ 116,596
	120% of AMI (HTF)	$ 67,452	$ 77,088	$ 86,724	$ 96,360	$ 104,069	$ 111,778	$ 119,486	$ 127,195
Norwich-New London MSA									
Norwich-New London - HMFA	25% of AMI	$ 16,065	$ 18,360	$ 20,655	$ 22,950	$ 24,786	$ 26,622	$ 28,458	$ 30,294
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,560	$ 63,650	$ 67,750
	50% of AMI	$ 32,130	$ 36,720	$ 41,310	$ 45,900	$ 49,572	$ 53,244	$ 56,916	$ 60,588
	60% of AMI	$ 43,140	$ 49,260	$ 55,440	$ 61,560	$ 66,540	$ 71,460	$ 76,300	$ 84,300
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 51,408	$ 58,752	$ 66,096	$ 73,440	$ 79,315	$ 85,190	$ 91,066	$ 96,941
	100% of AMI (AHP)	$ 64,260	$ 73,440	$ 82,620	$ 91,800	$ 99,144	$ 106,488	$ 113,832	$ 121,176
	110% of AMI (ECL)	$ 70,686	$ 80,784	$ 90,882	$ 100,980	$ 109,058	$ 117,137	$ 125,215	$ 133,294
	120% of AMI (HTF)	$ 77,112	$ 88,128	$ 99,144	$ 110,160	$ 118,973	$ 127,786	$ 136,598	$ 145,411
Colchester-Lebanon - HMFA	25% of AMI	$ 20,125	$ 23,000	$ 25,875	$ 28,750	$ 31,050	$ 33,350	$ 35,650	$ 37,950
	30% of AMI - HOME/CDBG	$ 24,150	$ 27,600	$ 31,050	$ 34,500	$ 37,300	$ 40,050	$ 42,800	$ 45,550
	30% of AMI (NHTF)	$ 24,150	$ 27,600	$ 31,050	$ 34,500	$ 37,300	$ 40,050	$ 42,800	$ 45,550
	Very Low Income - HOME/CDBG	$ 40,250	$ 46,000	$ 51,750	$ 57,500	$ 62,100	$ 66,700	$ 71,300	$ 75,900
	50% of AMI	$ 40,250	$ 46,000	$ 51,750	$ 57,500	$ 62,100	$ 66,700	$ 71,300	$ 75,900
	60% of AMI	$ 48,300	$ 55,200	$ 62,100	$ 69,000	$ 74,520	$ 80,040	$ 85,560	$ 91,080
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 64,400	$ 73,600	$ 82,800	$ 92,000	$ 99,360	$ 106,720	$ 114,080	$ 121,440
	100% of AMI (AHP)	$ 80,500	$ 92,000	$ 103,500	$ 115,000	$ 124,200	$ 133,400	$ 142,600	$ 151,800
	110% of AMI (ECL)	$ 88,550	$ 101,200	$ 113,850	$ 126,500	$ 136,620	$ 146,740	$ 156,860	$ 166,980
	120% of AMI (HTF)	$ 96,600	$ 110,400	$ 124,200	$ 138,000	$ 149,040	$ 160,080	$ 171,120	$ 182,160
Worchester, MA-CT									
Windham County - HMFA	25% of AMI	$ 15,208	$ 17,380	$ 19,553	$ 21,725	$ 23,463	$ 25,201	$ 26,939	$ 28,677
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,550	$ 63,650	$ 67,750
	50% of AMI	$ 30,415	$ 34,760	$ 39,105	$ 43,450	$ 46,926	$ 50,402	$ 53,878	$ 57,354
	60% of AMI	$ 36,498	$ 41,712	$ 46,926	$ 52,140	$ 56,311	$ 60,482	$ 64,654	$ 68,825
	Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
	80% of AMI	$ 48,664	$ 55,616	$ 62,568	$ 69,520	$ 75,082	$ 80,643	$ 86,205	$ 91,766
	100% of AMI (AHP)	$ 60,830	$ 69,520	$ 78,210	$ 86,900	$ 93,852	$ 100,804	$ 107,756	$ 114,708
	110% of AMI (ECL)	$ 66,913	$ 76,472	$ 86,031	$ 95,590	$ 103,237	$ 110,884	$ 118,532	$ 126,179
	120% of AMI (HTF)	$ 72,996	$ 83,424	$ 93,852	$ 104,280	$ 112,622	$ 120,965	$ 129,307	$ 137,650
County									
Litchfield County	25% of AMI	$ 17,955	$ 20,520	$ 23,085	$ 25,650	$ 27,702	$ 29,754	$ 31,806	$ 33,858
	30% of AMI - HOME/CDBG	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 38,200	$ 40,700
	30% of AMI (NHTF)	$ 21,600	$ 24,650	$ 27,750	$ 30,800	$ 33,300	$ 35,750	$ 39,640	$ 44,120
	Very Low Income - HOME/CDBG	$ 35,950	$ 41,050	$ 46,200	$ 51,300	$ 55,450	$ 59,550	$ 63,650	$ 67,750

DOH Development Program Income Limits based on HUD Median Incomes

2020 Income Limits (Revised 9/16/2020)

PMSA/MSA Area

	Household Size							
	1	2	3	4	5	6	7	8
50% of AMI	$ 35,910	$ 41,040	$ 46,170	$ 51,300	$ 55,404	$ 59,508	$ 63,612	$ 67,716
60% of AMI	$ 43,092	$ 49,248	$ 55,404	$ 61,560	$ 66,485	$ 71,410	$ 76,334	$ 81,259
Low Income - HOME/CDBG	$ 54,950	$ 62,800	$ 70,650	$ 78,500	$ 84,800	$ 91,100	$ 97,350	$ 103,650
80% of AMI	$ 57,456	$ 65,664	$ 73,872	$ 82,080	$ 88,646	$ 95,213	$ 101,779	$ 108,346
100% of AMI (AHP)	$ 71,820	$ 82,080	$ 92,340	$ 102,600	$ 110,808	$ 119,016	$ 127,224	$ 135,432
110% of AMI (ECL)	$ 79,002	$ 90,288	$ 101,574	$ 112,860	$ 121,889	$ 130,918	$ 139,946	$ 148,975
120% of AMI (HTF)	$ 86,184	$ 98,496	$ 110,808	$ 123,120	$ 132,970	$ 142,819	$ 152,669	$ 162,518

AMI - Area Median Income
NHTF - Federal National Housing Trust Fund
HOME - Federal HOME Investment Partnerships Program
AHP - State Affordable Housing Program (FLEX)
HTF - State Housing Trust Fund Program
ECL - Energy Conservation Loan Program
CDBG - Community Development Block Grant

TOWN OF BERLIN
SOCIAL & YOUTH SERVICES DEPARTMENT
240 KENSINGTON ROAD BERLIN, CT 06037

Director
Doug Truitt
Social Worker
Jaymee Miller

March 2, 2021

Comments on the revised (02/24/2021) 404 Berlin Turnpike Housing Affordability Plan

I would like to submit the following comments and concerns regarding the most recent revision of the proposal for an Affordable Housing Development at 404 Berlin Turnpike.

Chapter 54 Section 4-166(13) of the Connecticut General Statutes defines a regulation as:

> "each agency statement of general applicability, without regard to its designation, that implements, interprets, or prescribes law or policy, or describes the organization, procedure or practice requirements of any agency."

When Berlin Zoning Regulations VIII H.8 authorizes the construction of deed restricted Affordable Housing units conforming with C.G.S. §8-30g, it carries with it the expectation that such housing will be in compliance with the regulations promulgated for implementing that statute.

As currently proposed, the 404 Berlin Turnpike Housing Affordability Plan is not in compliance with section 8-30g of the State regulations. In order to be considered Affordable Housing and be counted towards the 10% threshold required for municipalities to be exempt from the statute, section 8-30g-2(a) (3) (B) of State regulations stipulates that rents "**Are calculated, consistent with section 8-30g-8 of the Regulations of Connecticut State Agencies**, by limiting assumed annual household expenditures for housing to no more than thirty percent (30%) of such household annual income." Section 8-30g-2(a) (3) also requires that the method for rent calculation be included in the deed restrictions.

Section 8-30g-8 defines a process for calculating the maximum allowed rents based on HUD regional or statewide median income, assumed occupancy based on number of bedrooms, and comparison to HUD Fair Market Rents by locality. The 404 Berlin Turnpike proposal is out of compliance with this in the following ways:

1) In section VIII, Maximum Rental Price, the proposal states that "a studio apartment is calculated as a one-bedroom unit". This is in direct contradiction of 8-30g-8 which stipulates that rent for a studio apartment is calculated at one person occupancy, a 1-bedroom at 1.5 person occupancy, and a 2-bedroom at 3 person occupancy.
2) The sample rent calculation in the same section does not implement the formula defined in 8-30g-8, and arrives at a maximum rent allowance significantly larger than would be calculated by applying the method defined in the regulations.

If this plan were to go forward as written, none of the housing units in the development would be considered as Affordable Housing by the State, and Berlin would drop further below the 10% threshold needed for exemption from §8-30g. I recommend the Town require that the plan be revised to be in compliance with State regulations before moving forward.

Doug Truitt

Doug Truitt, MCW
Berlin Social & Youth Services