



Norwalk Affordable Housing Action Plan

2025

ACKNOWLEDGEMENTS

The City of Norwalk Affordable Housing Plan Advisory Committee was formed to assess the City's affordable housing needs and address their potential economic, environmental, and social equity impacts. The purpose of the Affordable Housing Action Plan is to help the City to identify different levels and types of affordable housing needed, while providing guidance and direction on how to achieve those levels. While the plan was required to comply with CT General Statute 8-30j, the City viewed this planning process as an opportunity to fully understand the City's housing needs at all income levels and develop strategies to ensure there are housing options available to all who seek to live in our great City. We thank the members of this committee, who helped guide this plan through the inclusive planning process.

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PLAN PREPARED BY:



GLOSSARY OF TERMS AND ACRONYMS

Term	Acronym	Definition
Accessory dwelling units	ADUs	A smaller, independent residential dwelling unit located on the same lot as a stand-alone (i.e., detached) single-family home. ¹
Area Median Income	AMI	Measure used to define income eligibility, defined by the U.S. Department of Housing and Urban Development. For Norwalk, the AMI is calculated from all households within Fairfield County. ²
Community Development Block Grant	CDBG	A program which provides annual grants on to municipalities to develop housing and economic opportunities for residents in low and moderate-income groups. ³
Connecticut General Statutes	CGS	The official codified public acts (as well as special acts that impact the public) of the State of Connecticut. ⁴
Connecticut Department of Housing	CT DOH	A State governmental department devoted to housing in the state of Connecticut.
Dissimilarity Index	DI	A measure of evenness regarding segregation ranging from 0.0 to 1.0.
Office of Brownfield Remediation and Development	OBRD	A State governmental department devoted to brownfield redevelopment. It provides financial and technical assistance to municipalities, economic development agencies, brownfield owners, and potential developers.

¹ <https://www.planning.org/knowledgebase/accessorydwellings/>. Accessed 9/6/2024

² <https://affordablehousingonline.com/housing-search/Connecticut/Norwalk?page=3>. Accessed 9/6/2024

³ https://www.hud.gov/program_offices/comm_planning/cdbg. Accessed 9/6/2024.

⁴ <https://libguides.ctstatelibrary.org/law/statutes>. Accessed 9/6/2024.

Shared Appreciation Mortgages	SAMS	A type of home loan in which the lender receives an interest that is contingent on the value appreciation of the home. ¹
State Median Income	SMI	The median income for the state of Connecticut.
Western Connecticut Council of Governments	WestCOG	A regional council of governments in western Connecticut that collaborate to address regional issues. ²

¹ <https://www.cga.ct.gov/2019/rpt/pdf/2019-R-0190.pdf>. Accessed 9/11/2024.

² <https://westcog.org/about/what-is-a-cog/>. Accessed 9/6/2024.

INTRODUCTION & EXECUTIVE SUMMARY

The Norwalk Affordable Housing Action Plan (the “Plan”) assesses the City’s affordable housing needs and addresses their potential economic, environmental, and social equity impacts. This Plan fulfills Connecticut General Statutes (CGS), Title 8, Chapter 126a, § 8-30j which requires each municipality in the State of Connecticut prepare an affordable housing plan once every five years. Per the US Department of Housing and Urban Development and CGS Section 8-30g, housing is considered affordable if the cost of rent or home ownership including utilities is not more than 30% of a household’s gross monthly income for households with an income at or below 80% of the area median income. Minimum wage, at \$15.69 per hour in 2024, has not kept pace with the cost of housing in Norwalk. Based on the HUD formula, the maximum amount a person making minimum wage can spend per month on housing is \$816. The average rental cost of a studio apartment in Norwalk is over \$1,800 per month, requiring a minimum household income of \$72,000 or \$35 per hour.

Norwalk strives to be a city with housing accessible to all, a place where residents can live and work because of the affordable, diverse housing stock that accommodates the diversity of its population.

The development of this Plan was guided by empirical data, community engagement, City of Norwalk staff, and the Affordable Housing Plan Advisory Committee. Through this analysis and engagement, Norwalk’s vision for affordable housing was established.

A common set of guiding principles emerged through the public engagement process. These principles were used to set goals for achieving housing opportunity, equity, health, sustainability, and inclusivity. In the action plan, several goals are identified to meet each principle, and action items and responsible parties are identified to achieve each goal.



Principle 1: Norwalk is a diverse and inclusive city that strives to provide a diversity of housing types to meet the needs of all residents, as well as those who are employed in Norwalk and desire to live within the city.



Principle 2: Norwalk has a critical need to provide more affordable housing, social services, and economic pathways for its very low-income households. The market alone will not address this gap and public investment is required.



Principle 3: Norwalk recognizes that financial incentives such as tax abatements and grants are needed to bridge the market gap and facilitate the preservation and construction of quality affordable and moderate income housing.



Principle 4: Norwalk recognizes that the housing crisis is a complex regional problem that requires partnerships with state and federal agencies to address its many fronts. Norwalk is committed to advancing equity in housing, and to addressing enduring racial disparities in income levels and housing access.

STATE AND LOCAL CONTEXT

Norwalk prepared this Affordable Housing Action Plan to satisfy the statutory requirements of CGS Section 8-30j. The statute requires that:

1. At least once every five years, every municipality must prepare or amend and adopt an affordable housing plan.
2. The plan must specify how the municipality intends to increase the number of affordable housing developments within the municipality.
3. The municipality may hold public informational meetings or organize other activities to inform residents about the plan development process.
4. The municipality must provide at least 35 days notice for a public hearing on adoption of the plan and must make the draft plan available to the public for review prior to such public hearing.
5. Following adoption, the municipality must regularly review and maintain their affordable housing plan.¹

Section 8-30j provides a pathway for municipalities to achieve the affordable housing goals in Section 8-30g. The Affordable Housing Land Use Appeals Procedure under CGS § 8-30g establishes an appeals procedure where local zoning denials of affordable housing proposals may be overridden in municipalities where less than 10% of the housing stock is affordable or if they have not been granted a moratorium for taking measurable steps to reach the 10% goal. According to the State's 2023 Land Use Appeals data, 13.34% of Norwalk's housing stock is considered affordable. However, Norwalk is surrounded by communities that fall well

¹ Regional Plan Association (RPA) and Connecticut Department of Housing. "Planning for Affordability in Connecticut: Affordable Housing Plan and Process Guidebook." December 2020. Available at: <https://rpa.org/work/reports/connecticut-affordable-housing-plan-process-guidebook>

below the State's threshold including: New Canaan (3.93%), Westport (3.77%), and Wilton (3.55%). In Fairfield County, only Bridgeport (20.68%), Danbury (10.51%), Norwalk, and Stamford (13.93%) exceed the 10%.¹

This discrepancy among Norwalk's neighbors highlights the need for a regional approach to housing. While Norwalk has taken great strides towards meeting the housing needs of its residents and workers, there is still a significant gap. This Plan looks at how Norwalk can continue to exceed the 10% minimum, as well as expand affordable housing opportunities.



Community Listening Session, November 16, 2023

AFFORDABLE HOUSING NETWORK

Various agencies and groups—from the federal to the local level—are involved in affordable housing in Norwalk. The following section identifies the key agencies, organizations, and groups involved in the development and administration of affordable housing in Norwalk.

FEDERAL AND STATE AGENCIES

- Federal and State agencies influence funding and financing of affordable housing units.
- US Housing and Urban Development (HUD) - administers various funding programs such as the Federal Housing Association (FHA) first time homebuyers

¹ Affordable Housing Appeals listing CT.gov. Available at: <https://portal.ct.gov/DOH/DOH/Programs/Affordable-Housing-Appeals-Listing> (Accessed: 16 August 2024).

loans, Housing Choice Vouchers, HOME Investment Partnerships Program (HOME), and Community Development Block Grant (CDGB).

- Connecticut Housing Finance Authority (CHFA) - provides funding for housing programs through local governments and community groups, distributes the Low-Income Housing Tax Credits (LIHTC), and helps manage lending for first-time homeowners.
- Connecticut Department of Housing (DOH) - offers a range of funding sources for affordable housing such as the Housing Trust Fund and the Affordable Housing Program.

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- Norwalk Redevelopment Agency - provides grant opportunities that help to maintain naturally affordable housing, such as the South Norwalk Improvement Program and the Residential Improvement Fund.
- Norwalk Economic Development Office - provides financing assistance to larger-scale housing developments, which would include requirements for affordable housing units.
- Norwalk Planning and Zoning Department – makes decisions that affect density and land use, including review of development applications and implementation of long-term planning goals.

NORWALK HOUSING AUTHORITY

- The Norwalk Housing Authority (NHA) - provides affordable housing for low-income and senior residents through construction and maintenance of public housing residences, as well as Section 8 Housing Choice Vouchers (HCV) and the Homeownership Voucher program.

HOUSING DEVELOPERS

- Non-profit Developers - Certain non-profits, including Community Development Corporations (CDCs) and nation-wide developers such as Enterprise and the National Housing Trust, specialize in building, rehabilitating, and managing affordable housing developments.
- Private Developers - Developers of multifamily market-rate housing are often required to include a percentage of affordable housing units or pay into the City's fund to develop affordable housing.

COMMUNITY AND ADVOCACY NON-GOVERNMENT ORGANIZATIONS (NGOS) (EXAMPLES)

- Open Doors - offers affordable housing units to very low-income households, connects low-income households and people experiencing homelessness with educational and housing services.
- Malta House – provides shelter, support services, and independent living skills to pregnant and parenting mothers.
- Homes with Hope – provides emergency shelter, permanent supportive housing, and mentoring services for individuals and families facing homelessness.
- Pacific House – provides emergency shelter and deeply affordable housing to people experiencing homelessness.

DEVELOPMENT OF THE PLAN

The City of Norwalk established a committee to lead the preparation of the Plan which included representatives from the Norwalk Affordable Housing Committee, the Norwalk Planning Department, the Norwalk Housing Authority, the Norwalk Redevelopment Agency and Open Doors. The City also retained the services of a consultant team including AKRF, KDLLC, and the Land Use Law Center at Pace Law to prepare the Plan. The Affordable Housing Action Plan kicked off in September 2023.

HOUSING NEEDS ASSESSMENT

The first step in the process was initiating public outreach and engagement to facilitate the development of the Housing Needs Assessment. The Housing Needs Assessment, which is summarized in Section 3 and included in full as **Appendix A** of this document, included extensive community input and data analysis. The assessment sought to identify the need for housing at all price points for all income levels. The Housing Needs Assessment led to recommendations for closing the gap in housing including units offered through affordable housing programs as well as units offered on the open market, which are further discussed and elaborated on in this Affordable Housing Action Plan. The Housing Needs Assessment was completed in June 2024, and key findings were presented to the Affordable Housing Plan Advisory Committee and to the public on June 24th, 2024. Four key objectives governed production of Housing Needs Assessment:

1. Engage the Norwalk community and housing stakeholders in robust dialogue about current and future housing needs
2. Compile demographic, housing, and market data to identify the factors, trends, and shifts that are impacting housing needs
3. Identify disparities and the unique needs of different sub-populations including certain lower-income households, racial groups, or age groups.

4. Serve as a tool for housing policy and program design, the next phase in the Norwalk Affordable Housing Plan.

Community Input

The Housing Needs Assessment included a broad community outreach process aimed at collecting qualitative observations about housing needs. This process included an extensive public engagement process; interviews with local housing stakeholders; and collaboration with the Norwalk Redevelopment Agency on a housing preference survey. Roundtable discussions with residents and city staff were held in November 2023. A Housing Needs Webinar and in-person Housing Needs Community forum were held in November of 2023. In addition, pop-up events were hosted throughout the City where residents were encouraged to engage in conversations about housing needs in Norwalk and leave notes with their ideas on poster boards for the committee to review. Other engagement included stakeholder interviews and an online survey.



Post-it note exercise from engagement event on March 3, 2024.

Demographic Trends

Drawing primarily on the most recently available data from the US Census Bureau's American Community Survey (1-year data from 2022), the assessment analyzes both local and regional shifts in demographic composition and considers how these shifts may be impacting changes in the types of housing needed or identify the reasons behind certain housing challenges.

Housing Inventory & Conditions

Drawing upon census data as well as additional data provided by the City of Norwalk, the assessment includes a detailed presentation of the existing supply of housing in Norwalk as well as trends related to housing cost burden.

Market Trends

Shifts in the demand for sales and rental housing for both the locality and the region are presented in the assessment to show how housing costs have been rising while available inventory has been plummeting.

DEVELOPMENT OF THE AFFORDABLE HOUSING ACTION PLAN

The Housing Needs Assessment identified a need to increase the supply of housing at all income levels. The following overarching policy responses to address the critical housing needs of Norwalk residents emerged from this effort. These policy responses are further developed in Section 5, "Vision, Principles, Goals, and Actions" of this document.

Local Zoning and Regulatory Changes

The City can implement additional zoning and regulatory tools to encourage the development of affordable housing. Potential tools include expansion of the City's

PUBLIC ENGAGEMENT SUMMARY

1. *Community and Economic Development Roundtable* 11/9/2023 and 11/14/2024: Discussion with City of Norwalk, Norwalk Affordable Housing Committee, and Norwalk Community Service Providers.
2. *Norwalk Talks Housing Public Listening Session* 11/16/2023 and 11/30/2023 with discussions and breakout group activity
3. *Pop Up City of Norwalk Holiday event* 12/2/2023: Discussions about housing initiatives and issues, interactive post it activity
4. *Pop Up at Norwalk ESL class* 1/11/2024: Discussions about housing initiatives and issues, interactive post it activity
5. *Pop Up at Open Doors shelter* 1/18/2024: Discussions about housing initiatives and issues, interactive post it activity
6. *Pop Up at Norwalk Libraries* 1/31/2024 and 2/4/2024: Discussions about housing initiatives and issues, interactive post it activity
7. *Pop Up with Family & Children's Agency at Senior Court* 3/4/2024: Discussions about housing initiatives and bingo activity
8. *Interviews* with Norwalk Planning Department, Norwalk Housing Authority, Norwalk Redevelopment Agency, and Open Doors

inclusionary zoning requirements¹; increasing density bonuses for the provision of affordable housing units; further incentivizing family-sized affordable housing and moderate income housing units; allowance to alternative housing types such as single-room occupancy buildings; and increasing permitted density to facilitate increased supply of all housing types. In addition, the City can further explore transit oriented development incentives, reduction of parking requirements, and reducing the limitations on accessory dwelling units (ADUs). Lastly, the City could streamline the development review and approval process for affordable developments, which decreases the development costs for the applicant and could advance projects in a more efficient manner.

Public Private Partnerships

Underutilized city-owned land could be redeveloped for affordable housing, including family sized and deeply affordable units, through public private partnerships. Through a Request for Proposals process the City could seek development proposals with specific criteria to meet identified housing needs and community goals on identified underutilized parcels. Through this competitive solicitation process, the City could identify a preferred development program that could be implemented through a mix of public land, public funds (e.g., grants), and private capital.

Tax and Financing Innovations

The City can utilize financing innovations to facilitate affordable housing development, as well as the preservation and rehabilitation of existing affordable housing. Financing innovations include micro-grants, community land trusts, and tax abatements. Micro-grants could be used to facilitate capital improvements on existing developments. Community land trusts enable the construction of affordable home ownership units on commonly held land. Tax abatements can be utilized to incentivize affordable housing development.

Administration and Implementation

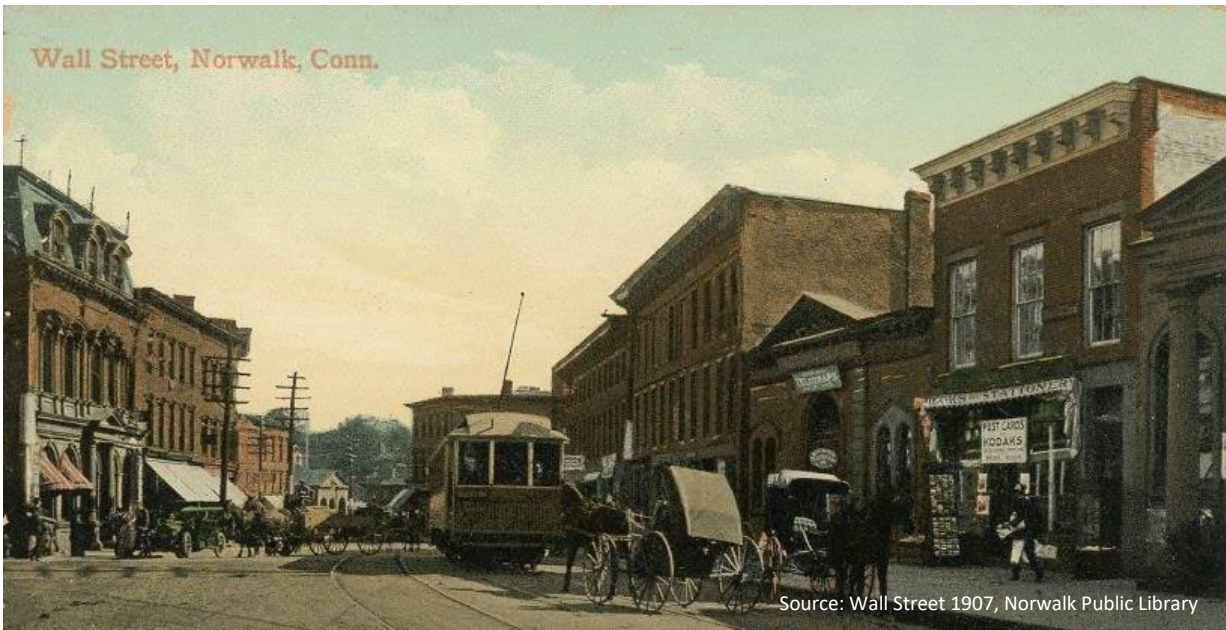
To realize the policies and implementation measures identified in the Affordable Housing Action Plan, it will be important for the City to track progress. Section 5, “Vision, Principles, Goals, and Actions” identifies key policy strategies, implementation measures, responsibility for the action item, and anticipated timeline. To document progress, the City should

¹ Norwalk’s inclusionary zoning requirements are set forth in Section 6.12, Workforce Housing.

implement a tracking system for annual housing starts and demolitions to chart annual shifts in its housing supply.

Federal and State Advocacy

A barrier to certain types of affordable and missing middle housing—in particular, home ownership units—are the tax and financing policies at the state and federal level. Norwalk can utilize its state and federal delegations to lobby for policy changes needed to overcome the institutional, financing, and tax code barriers to multi-family ownership buildings including condominiums and limited equity coops. Such policies that encourage rental over ownership units include the federal IRC §42 Low Income Housing Credit Program. At the state level, programs such as the Department of Housing Homeownership Initiative (PA 22-118) could be expanded. In addition, the City can continue to advocate for more governmental funding for public and affordable housing.



HISTORY OF AFFORDABLE HOUSING IN NORWALK

Norwalk's history of affordable housing is reflective of national trends in housing policy, including the impact of post-war suburban sprawl, urban renewal, redlining, and discriminatory financing practices. This history influences Norwalk's position in Fairfield County's land use patterns and housing conditions today. As reported in the Commission on Connecticut's Future and Development's *Report of the Affordable Housing Plans Working Group*, February 2023, Connecticut has an imbalance of single-family and multi-family development, which contributes to a regional housing shortage and residential segregation. Half of all 5+ unit buildings in Connecticut are in 13 (including Norwalk) of the 169 municipalities. The Bridgeport-Stamford-Norwalk metropolitan area is residentially segregated as measured by the Dissimilarity Index score (DI) and ranks in the top 20 percent of all metropolitan areas in the country (total of 366). DI compares the distribution of two different groups (in this case, white and non-white) across census tracts within a state and indicates the percent of a particular racial group that would have to relocate to achieve an even distribution.¹

¹ Commission on Connecticut's Future and Development, Report of the Affordable Housing Plans Working Group, February 2023, p. 9

EARLY SETTLEMENT THROUGH 20TH CENTURY

Norwalk was one of the earliest European settlements in colonial Connecticut, dating back to 1640 as a farming, port, and shell fishing community. It evolved into a manufacturing center between the late nineteenth and early twentieth century. Following regional trends, manufacturing declined post World War II, and Norwalk saw a growth in suburban office parks such as Merritt 7, as well as a suburban housing boom. Norwalk experienced the greatest population growth between 1940 and 1970, which is when many of its suburban single-family residential neighborhoods were built out.¹

Norwalk has a long history of striving to meet the housing needs of its residents. The Norwalk Housing authority was established in 1939 to provide decent, affordable housing for eligible low-income families and the elderly. South Norwalk experienced urban renewal programs in the 1960s which demolished old buildings on West Washington Street, and replaced them with offices, a shopping center, and public housing. However, in the 1970s historic preservationists pushed back on further urban renewal through the creation of historic districts.²

The Fair Housing Act of 1968 prohibited discrimination concerning the sale, rental, and financing of housing based on race, religion, national origin, sex, (and as amended) handicap and family status. The Fair Housing Act grew out of the Civil Rights movement and was in response to national housing policies that contributed to housing segregation, such as the process of “redlining” minority neighborhoods based on perceived investment risk and discriminatory real estate practices such as restrictive covenants.³ Norwalk spent the next decade advancing Fair Housing Act Policies. By 1978, Norwalk had developed a Fair Housing Plan, established a Human Relations Commission, conducted a Fair Housing Conference with minority-oriented housing groups, advertised fair housing information in the media, and conducted meetings with realtors to inform them of fair housing requirements.⁴

¹ Norwalk Citywide Plan: 2019-2029 Plan of Conservation & Development, pg. 6

² Norwalk Citywide Plan: 2019-2029 Plan of Conservation & Development, pg. 7

³ https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutfheo/history

⁴ The Status of Equal Housing Opportunity A Report of the Connecticut Commission on Human Rights and Opportunities, May 1978

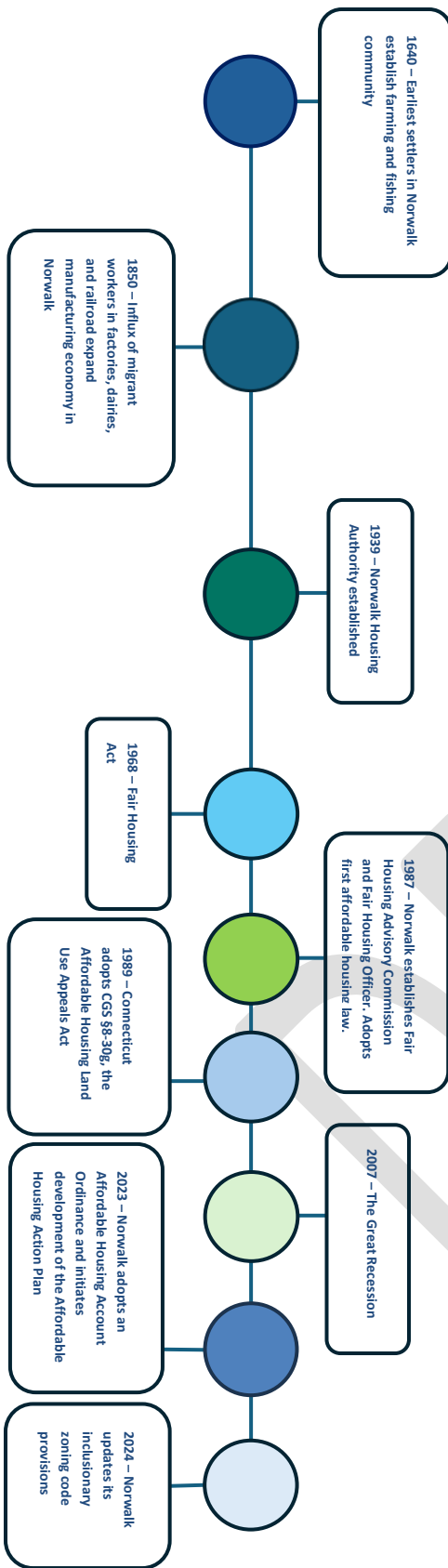
However, in 1983 the NAACP filed a Fair Housing complaint with the United States Department of Housing and Urban Development (HUD), which then initiated an investigation into Norwalk's housing practices. HUD's investigation concluded that Norwalk had concentrated subsidized low-income housing projects in minority neighborhoods, particularly in South Norwalk. The report cited a 1979 Common Council decision to reject a plan to construct 45 low-income units on Keeler Avenue, near the Darien border.¹ The complaint was resolved by consent decree in 1986 (which was later amended in 2004), which resulted in the establishment of the Norwalk Fair Housing Advisory Commission and the position of Fair Housing Officer which share a mission to educate, advocate, assist and advise the City and its residents regarding housing discrimination with the goal of eliminating it. The Fair Housing Advisory Commission monitors private and public housing practices for compatibility with fair housing laws and objectives, identifies problem areas and makes recommendations to the Mayor, Common Council, and other appropriate city agencies/commissions. The Fair Housing Officer provides information/assistance regarding landlord/tenant laws, housing discrimination and foreclosure; investigates housing discrimination complaints and assists residents in seeking remedies; conducts educational programs and writes a quarterly newspaper column; works with Norwalk landlords and tenants, property managers and real estate professionals; and assists developers and architects of new multifamily housing as to the accessibility requirements in the Fair Housing Act.² Norwalk adopted its first affordable housing regulations in 1987.

In 1989 the State of Connecticut "Blue Ribbon Commission" released a Housing Report to the Governor and General Assembly. This report found a deficit in housing across the state, including a 13.87 percent deficit in the number of units for south western Connecticut, which includes Norwalk.³ This report, and the 1988 Connecticut Supreme Court decision in *Builders Service Corp. v. East Hampton Planning and Zoning Commission*, which identified exclusionary zoning practices, led to the adoption of Connecticut General Statutes (CGS) §8-30g, the Affordable Housing Land Use Appeals Act, in 1989.

¹ Dudko, R. (1984, May 6). Norwalk Accused of Bias in Housing. *The New York Times*.

² <https://www.norwalkct.gov/1134/Fair-Housing>

³ Blue Ribbon Commission Housing Report to the Governor and General Assembly, February 1989, p. 9



The Affordable Housing Land Use Appeals Procedure under CGS § 8-30g places the burden of proof on municipalities to defend their land use decisions to reject qualifying affordable housing development applications or approve them with costly conditions. The purpose of this law was to prevent the rejection of new affordable housing developments by local land use boards for arbitrary and capricious reasons. Between 1991 and 2000, the General Assembly revised CGS § 8-30g to promote economic and racial diversity and choice in housing, and to clarify the moratorium procedures. Norwalk is one of the few municipalities in Connecticut that has a sufficient percentage of affordable housing such that it is exempt from the land use appeals procedure under CGS § 8-30g.

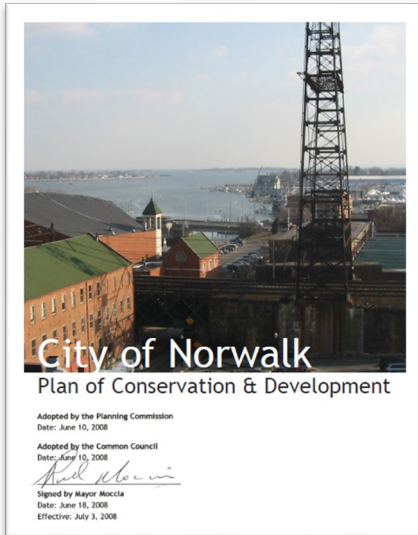
21ST CENTURY

Since 2000, Norwalk has continued to grow as a desirable location for residents and businesses with convenient rail transit, access to Interstate 95, strong and diverse neighborhoods, location on the Long Island Sound, and regional attractions. Norwalk's 2008 Plan of Conservation and Development (2008 POCD) documented an annual increase in housing prices between 2000 and 2008 at a rate of 16% for owner-occupied and 17% for rental housing and identified affordability an increasing concern. The 2008 POCD noted that Norwalk is almost fully built-out, the lack of "greenfields", and the need for advancing infill development to meet housing needs. It also noted that housing for lower- and moderate-income households should be dispersed throughout the city in forms appropriate to the neighborhood/district, as well as through Fairfield County as a whole to ensure surrounding localities are doing their "fair share." In 2004, Norwalk built over 40% of Fairfield County's multifamily structures containing five or more units.¹

In 2007, the State adopted the voluntary Incentive Housing Program CGS § 8-13m. However, that program's financial incentive provisions then never materialized due to the Great Recession that

¹ City of Norwalk Plan of Conservation and Development, July 3, 2008.

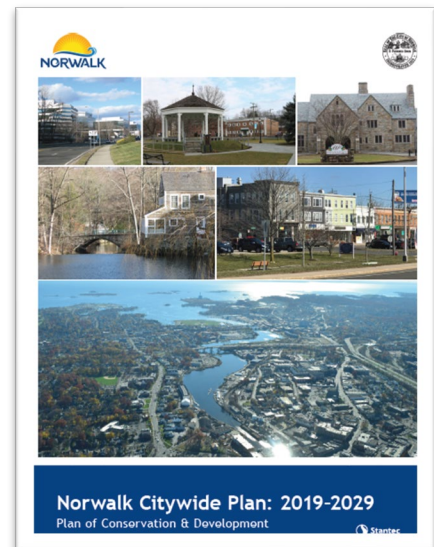
began in 2008. Norwalk's 2019 Plan of Conservation and Development (2019 POCD) noted that Norwalk, and Connecticut as a whole, were significantly affected by the Great Recession. By 2019, Connecticut had only recovered 76% of the jobs lost during the recession, and that Fairfield County was not yet back to pre-recession job numbers.¹



During the recession real estate values plummeted but recovered more quickly in Fairfield County compared to the rest of Connecticut. Norwalk remained attractive to households and businesses in the post-recession years, benefiting from its close proximity to New York City, lively urban centers, growth in multi-family residential development, and affordability compared to adjacent municipalities. However, housing prices and rents were expensive for lower-income workers. During that time period, Norwalk's zoning regulations required that a minimum of 10% of units in buildings with no less than 20 units be affordable to income-eligible tenants. The 2019 POCD noted that as of June 2018, the new multi-

family developments had produced 172 new affordable units.²

In 2017, the State directed all cities and towns to prepare a plan for affordable housing development at least every five years. Then in 2021, the State mandated that every municipality file an affordable housing plan no later than June 1, 2022, and updated the language of the statutes to require economic and racial diversity in housing. In March of 2022, a State Working Group on Affordable Housing Plans was established to prepare a guidance document for the



¹ Norwalk Citywide Plan: 2019-2029 Plan of Conservation & Development, pg. 7

² Norwalk Citywide Plan: 2019-2029 Plan of Conservation & Development, pg. 19

preparation of Affordable Housing Plans. This guidance document was released in February 2023.¹

In 2024, Norwalk adopted new zoning regulations that included updated inclusionary housing requirements. In an effort to create more affordable and moderate income housing units, the new regulations added a requirement that new developments with three to nine units either include one unit affordable to households earning no more than 80% SMI or be accompanied by an inclusionary zoning fee of \$10 per \$1,000 of residential construction cost to an Affordable Housing Account.² In addition, the new regulations provide an option to developers of more than ten units to either provide a minimum of 10% of the total number of dwelling units as inclusionary zoning units affordable to households earning no more than 60% SMI, or to provide a minimum of 10% of the total number of dwelling units as inclusionary zoning units affordable to households earning no more than 80% SMI accompanied by an inclusionary zoning fee of \$10 per \$1,000 of residential construction cost to be paid into the Affordable Housing Account. In addition, all new non-residential construction, exceeding twenty-five thousand square feet or more is required to pay an inclusionary zoning fee of \$10 per \$1,000 of construction cost to be paid into the Affordable Housing Account. The Affordable Housing Account is used to construct, rehabilitate, or repair affordable housing for individuals or families whose annual income does not exceed 60% SMI.

In developing this Affordable Housing Action Plan, Norwalk continues its long history of aiming to meet the housing needs of the Norwalk community. Norwalk continues to embrace its diversity and strives to be a city with housing accessible to all, a place where residents can live and work because of the affordable, varied housing stock that accommodates the multiplicity of its population.

¹ Report of the Affordable Housing Plans Working Group, Commission on Connecticut's Future and Development, February 2023

² The Affordable Housing Account was established by ordinance adopted by the Common Council in November 2023.



HOUSING NEEDS ASSESSMENT

INTRODUCTION

A Housing Needs Assessment was prepared as part of the development of Norwalk's Affordable Housing Action Plan. It was based on extensive community input and data analysis. The assessment sought to identify the need for housing at all price points for all income levels and led to recommendations for closing the gap in housing including units offered through affordable housing programs as well as units offered on the open market. It included a comprehensive inventory of the City's housing stock, much of which is significantly more diverse in type and price points than the housing supplied in the surrounding region. Four key objectives governed production of Housing Needs Assessment:



1. Engage the Norwalk community and housing stakeholders in robust dialogue about current and future housing needs



2. Compile demographic, housing, and market data to identify the factors, trends, and shifts that are impacting housing needs



3. Identify disparities and the unique needs of different sub-populations including certain lower-income households, racial groups, or age groups.



4. Serve as a tool for housing policy and program design, the next phase in the Norwalk Affordable Housing Plan.

The Housing Needs Assessment was completed in June 2024, and key findings were presented to the Affordable Housing Plan Advisory Committee and to the public on June 24th,

2024. This section summarizes the results and key findings of the Housing Needs Assessment. The complete assessment is included as **Appendix A**.

KEY FINDINGS

While meeting Norwalk's housing needs requires broader policy changes at all levels of governance, there are local strategies that Norwalk can undertake to relieve housing cost burdens and enhance accessibility to a wider variety of housing units. The Housing Needs Assessment was designed as a repository of data and observations that can help inform local policy decisions while also attesting to the enduring need for regional, state, and federal support for housing production.

1. The City has a critical need to provide more affordable housing, social services, and economic pathways for its very low-income households.

Although Norwalk has a relatively high median income of \$98,000 compared to \$92,000 for Connecticut, a large share of its population remains low-income. As shown in the table below, a quarter of all residents, 38% of renters, and 15% of homeowners earn less than \$50,000 a year.

Norwalk Households by Income Band, 2022			
Income Band	All Households	Renters	Owners
Below 22% SMI [Less than \$20,000]	10%	17%	4%
23% SMI - 39% SMI [\$20,000 to \$34,999]	8%	11%	5%
40% SMI - 55% SMI [\$35,000 to \$49,999]	7%	9%	6%
56% SMI - 83% SMI [\$50,000 to \$74,999]	14%	16%	13%
Under 56% SMI (below \$50,000)	25%	38%	15%

Source: US Census, ACS

While some of the households within this income bracket are housed in Norwalk Housing Authority units or receive housing choice vouchers, there are ultimately very few housing options for Norwalk's very low-income population. Some of the housing on the open market that is naturally affordable to very low-income residents is provided at a sub-standard level of condition. The City is currently limited in its legal ability to proactively inspect these homes and ensure their compliance with building codes. As such, very low-income residents are vulnerable not only to poor living conditions but also displacement and homelessness.

Meeting the housing needs of low-income households is challenging because of limited governmental funding for public housing; long waiting lists and low turnover rates for

Housing Authority units and vouchers; limited development sites, and the financial infeasibility of private developers constructing deeply affordable housing without substantial capital and operational subsidies.

However, none of these challenges mean that Norwalk cannot explore options for expanding its supply of housing for very low-income households. Continued advocacy for more governmental funding for public housing; partnerships with non-profit developers; and capitalizing affordable housing funds are all strategies that the City can use to ensure housing security for its most economically challenged residents. However, these housing approaches need to be interlinked with expanded anti-poverty strategies including social service provisions, financial counseling, vocational training, and job search assistance. The effectiveness of supportive services was demonstrated by the significant reduction of chronic homelessness in Norwalk over the last 10 years thanks to a broad range of homelessness prevention programs supported with federal and state monies and implemented by local organizations.

2. There are some renters and homeowners at all income levels that are financially burdened by the high cost of housing in Norwalk.

A large segment of Norwalk's households pays more than 30% of their household income toward their housing costs. These households, considered to be housing cost burdened, represent 39% of the city's 36,149 households and include both renters and homeowners. As shown in the table below, almost 14,000 Norwalk households were cost burdened in 2022.

Housing Cost Burdened Households in Norwalk (2022) Including Renters and Owners		
Cost Burdened Units for All Income Bands	#	%
Total Households	36,149	100%
Total Cost Burdened Households	13,986	39%
Cost Burdened Units by Income Band	#	%
Below 22% SMI [Less than \$20,000]	3,988	99%
23% SMI - 39% SMI [\$20,000 to \$34,999]	1,870	100%
40% SMI - 55% SMI [\$35,000 to \$49,999]	1,816	92%
56% SMI - 83% SMI [\$50,000 to \$74,999]	2,387	60%
Cost Burdened Units Above and Below 83% SMI	#	%
Over 83% SMI [\$75,000 or more]	3,925	17%
Under 83% SMI [Below \$75,000]	10,061	85%

Source: US Census, ACS

The rates of cost burden are notably higher for lower-income households. Approximately 85% of the households earning below 83% of Connecticut's State Median Income (SMI) are cost burdened compared to only 17% of households making more than 83% of SMI. Moreover, almost every single household making less than 40% SMI (or \$35,000) is housing cost burdened.

3. The City needs to significantly expand the supply of rental housing that are affordable to households earning incomes less than \$75,000 per year, or 83% of Connecticut's median income of \$92,000.

Although Norwalk residents are broadly cost-burdened, a much greater share (57%) of the city's 14,000 cost burdened households are comprised of renters than homeowners (43%). As shown in the table below, nearly half (47%) of Norwalk's approximately 17,000 renters were cost burdened in 2022. And as is the case with all residents generally, the rates of cost burden are notably higher for renters with lower incomes. Approximately 85% of the renters earning below 83% of Connecticut's SMI are cost burdened compared to only 14% of households making more than 83% of SMI. Moreover, almost every single renter making less than 40% SMI is housing cost burdened.

Housing Cost Burdened Renters in Norwalk (2022)		
Cost Burdened Renters for All Income Bands	#	%
Total Occupied Rental Units	16,996	100%
Total Cost Burdened Rental Units	7,994	47%
Cost Burdened Renters by Income Band		
Below 22% SMI [Less than \$20,000]	3,205	99%
23% SMI - 39% SMI [\$20,000 to \$34,999]	1,294	100%
40% SMI - 55% SMI [\$35,000 to \$49,999]	919	89%
56% SMI - 83% SMI [\$50,000 to \$74,999]	1,395	57%
Cost Burdened Renters Above and Below 83% SMI		
Over 83% SMI [\$75,000 or more]	1,181	14%
Under 83% SMI [Below \$75,000]	6,813	85%

Source: US Census, ACS

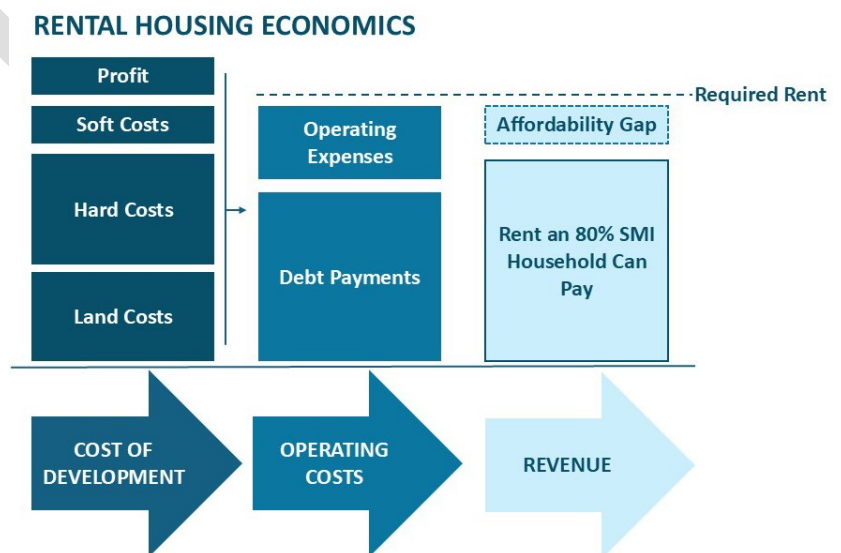
The number of cost burdened households represents a gap between the need for affordable rental housing and the available supply of appropriately priced units. ***As such, to close the gap, Norwalk would need to provide close to 8,000 units of affordable rental housing.*** Specifically, Norwalk needs 3,205 rental units for households under 22% SMI; 1,294 rental units for households between 23% and 39% SMI; 919 rental units for households between 39% and 55% SMI; 1,395 units for households between 55% and 82% SMI; and 1,811 units for households earning 83% SMI and above.

Neither affordable housing providers nor the private housing market is closing this gap in housing need. There is a vast shortage of income restricted housing such as those offered by the Norwalk Housing Authority. Meanwhile, the prices of Norwalk rental units on the open market are not serving households making less than 83% SMI:

- Approximately 76% of the 29 currently listed studio apartments are priced over \$1800, a rental cost requiring a minimum household income of \$72,000.
- Approximately 86% of the 131 currently listed one-bedroom apartments are priced over \$2,000, a rental cost requiring a minimum household income of \$80,000.
- Approximately 92% of the 90 currently listed two-bedroom apartments are priced over \$2,600, a rental cost requiring a minimum household income of \$104,000.

Even though there is a supply of 250 rental units currently on the open market, these units are not affordable to a significant share of Norwalk's population. Over the last ten years, Norwalk's median income has risen significantly (16%), climbing to \$98,000 in 2022. The median income for all renters is only \$71,000, an income level which is lower than the income needed for a large majority of rental units on the market. In addition, there are wide racial disparities in the income levels of Norwalk residents. For example, White households earn a median income of \$112,143, about \$40,000 higher than the median incomes of Black and Hispanic households. Brokers report that when rental units are affordable to households making less than 83% SMI come to market, these units are almost immediately rented. With zero fluidity in the affordable rental market, these households have no choice but to search for housing in other localities.

For Norwalk to close the affordability gap in its rental market and redress racial disparities in housing access, the City should contemplate a broad variety of tools for expanding the production of affordable rental housing including deeper levels of affordability in the City's inclusionary housing regulations; zoning changes that would enable higher levels of density in exchange for deeper levels and

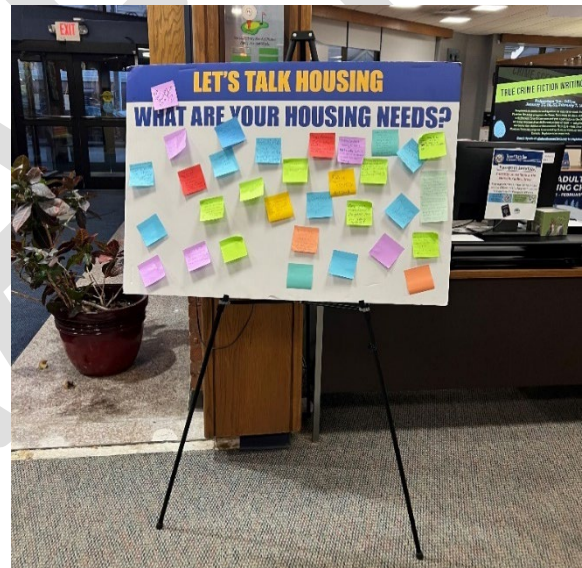


greater amounts of affordable rental housing; significant reduction or elimination of parking requirements for new transit-oriented rental development; streamlining the approval process for affordable housing developments; and tax abatements for affordable rental developments.

4. The City needs wider and more affordable options for homeownership.

Homeownership in Norwalk has fallen considerably both in proportional and absolute terms. Between 2012 and 2022, the homeownership rate fell from 65% of households to 55% of households. During this same period, the actual number of homeownership units dropped by 16% from 22,714 units to 19,513 units. Homeownership units are especially low for Black householders (44%), Asian householders (42%), and Hispanic householders (36%).

The fall in homeownership likely stems from a multiplicity of factors including the increased demand for rental housing, higher mortgage eligibility requirements, rising home values, and limited housing inventory. Barriers to building more homeownership units include limited availability of land for the construction of new single family; federal financing limitations, specifically access to FHA loans; tax policies that favor rental buildings; higher levels of liability for condo developers that in turn translate to increased costs; and the ambivalence of capital markets to finance condominiums given the risk exposure relative to rental buildings.



Amidst these supply constraints, the median sales price for a single-family home in Norwalk rose between rose by 41% from \$413,000 in September 2015 to \$700,000 in September 2023 while inventory plummeted by 81%. These trends are consistent with the surrounding region. During the same time period, Fairfield County's median sales price for single family homes rose by 55% while inventory declined by 74%.

Though owners are not as cost burdened as renters, just over 30% of Norwalk's homeowners pay more than 30% of their household income toward their housing costs. As shown in the table below, almost 6,000 Norwalk homeowners were cost burdened in 2022. The rates of cost burden are notably higher for lower-income homeowners.

Approximately 85% of the households earning below 83% of Connecticut’s State Median Income (SMI) are cost burdened compared to only 18% of households making more than 83% of SMI. Moreover, every single homeowner in Norwalk making less than 40% SMI is housing cost burdened.

Housing Cost Burdened Owners in Norwalk (2022)		
Cost Burdened Owners for All Income Bands	#	%
Total Occupied Owner Units	19,153	100%
Total Cost Burdened Owner Units	5,992	31%
Cost Burdened Owners by Income Band		
Below 22% SMI [Less than \$20,000]	783	100%
23% SMI - 39% SMI [\$20,000 to \$34,999]	576	100%
40% SMI - 55% SMI [\$35,000 to \$49,999]	897	96%
56% SMI - 83% SMI [\$50,000 to \$74,999]	992	65%
Cost Burdened Owners Above and Below 83% SMI		
Over 83% SMI [\$75,000 or more]	2,744	18%
Under 83% SMI [Below \$75,000]	3,248	85%

Source: US Census, ACS

Norwalk needs a greater amount and variety of sales units at different price points to help residents reap the investment benefits of homeownership and ensure long-term housing security. To make it easier and more affordable for residents to own their homes, the City will need to explore more regulatory tools such as zoning changes and lot size requirements that could enable a wider variety of homes including accessory units, townhomes, duplexes, or small cooperatively owned apartment buildings. Broader advocacy at the state and federal level is needed to overcome the institutional, financing, and tax code barriers to multi-family ownership buildings including condominiums and limited equity coops. Other potential pathways include the creation of community land trusts for ownership units that include income restrictions and resale limitations. Tax abatements for affordable ownership buildings may be another tool for helping developers overcome the financing barriers to condominium development. Lastly, affordable ownership units should be fast-tracked through the development approval process.

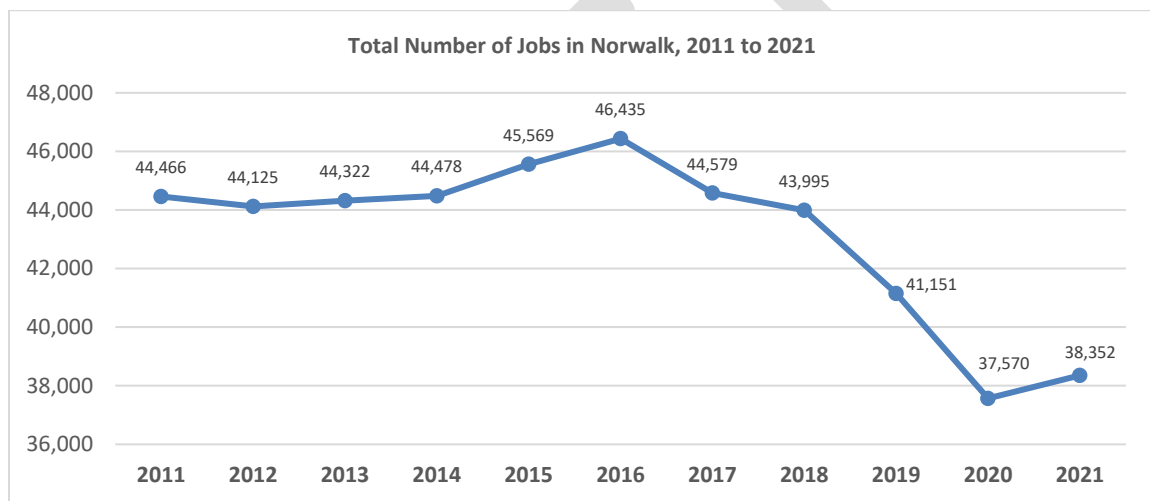
5. Norwalk needs more housing to accommodate its workers including retail workers, public safety personnel, teachers, and hospital workers.

Approximately 75% of all workers employed within Norwalk do not live within the city. These workers contribute not only to the local economy but also are essential workers critical to the provision of public services. However, a large share of Norwalk workers

cannot afford to live in the City. About a third of Norwalk workers make less than \$40,000 a year.

Further compounding the housing challenges of Norwalk workers is the lack of affordable rental housing in the communities surrounding Norwalk. As a result, lower income workers are forced to live further distances away from Norwalk, thereby taxing the local and regional road networks and contributing to higher levels of congestion and commuting times.

Meanwhile, the lack of affordable housing makes it harder for Norwalk's employers to secure labor or grow their businesses. Between 2011 and 2021, the number of jobs in Norwalk fell by 16% from 44,446 jobs to 38,352 jobs.



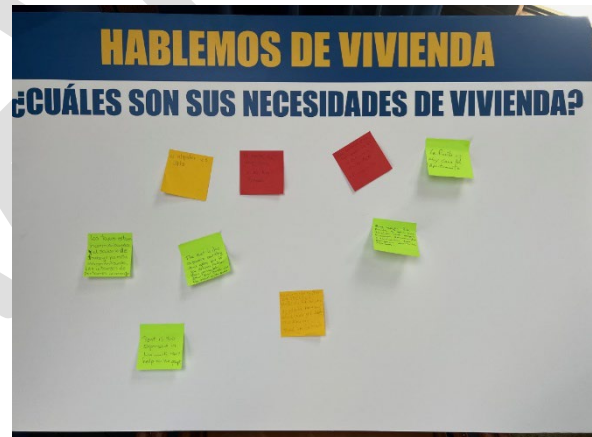
Norwalk needs more affordable and moderate income housing not only for the benefit of its workforce but also to nourish its local economy and commercial tax base. In order to make it easier for local workers to secure housing in Norwalk, the City needs to explore not only the above mentioned approaches for increasing the production of affordable rental housing but also examine options for prioritizing affordable housing for essential workers.

6. The City has a growing supply of new rental housing that serves the regional housing market but also fulfills local housing, quality of life and economic development needs.

As mentioned above, Norwalk has a healthy supply of rental housing units on the open market that are affordable to median income households. Moreover, the city's rental housing supply is expected to grow by hundreds of market-rate units over the next three years as approved rental buildings are constructed and come to market.

During the public outreach process for the housing needs assessment, many residents expressed the view that more market rate units are not needed because they are already in abundant supply. Other residents claimed that newer developments fulfill the housing needs of more affluent newcomers to Norwalk rather than long-time cost burdened residents. Some residents speculated that high-priced market rate units contribute to the elevation of all rental prices through the city.

While it is true that Norwalk does indeed have an adequate and growing supply of rental units that serve the regional market, these units are also providing a broad variety of local benefits that may not be readily discernible to all residents. First, the expanded supply of market rate units does in fact serve a sizeable segment of Norwalk's local population, a large share of which can in fact afford apartments priced at median income or higher. Over 35% of Norwalk renters earn more than \$100,000 a year. Higher income residents in turn enhance the city's consumer base for local businesses while also serving as a valuable labor supply for companies and organizations seeking to grow within the city. The production of new rental buildings, often built as part of broader redevelopment plans, has also helped to revitalize key parts of the City, especially South Norwalk and the Route 7 corridor. The redevelopment of empty or distressed sites in these areas has not only helped to enhance the overall livability and vitality of the city but also served to expand and diversify Norwalk's fiscal base. Lastly, the development of new rental buildings also resulted in the production of at least some affordable units through enforcement of inclusionary housing regulations generally mandating 10% of new units be affordable to households at 80% SMI.



Whether or not the newer higher priced rental units are more broadly increasing demand for housing in Norwalk and therefore inflating housing prices is less clear. There is no question that Norwalk's rental prices, as has occurred throughout the surrounding region, have risen considerably in recent years. Between 2017 and 2022, the median rent for all housing units in Norwalk increased by 16% from \$1,575 to \$1,840 per month. During this same period, Norwalk increased its supply of rental units by 755 units.

It is difficult, though, to determine the extent to which these new housing units are truly responsible for heating Norwalk's rental market and elevating citywide housing prices. Besides the fact that the new housing generally represents a unique rather than

competing or even complementary market segment, a broad range of regional and demographic factors have also placed pressure on Norwalk's older rental stock. Specifically, a rising demand for multi-family apartment rentals has grown throughout the region as younger families have sought more affordable alternatives to homeownership and seniors have sought to downsize from single family homes.

Rising rental prices in New York City and Westchester has in turn placed increased pressure on cities like Norwalk that offer an urban residential environment with diverse housing choices. Meanwhile, Norwalk's neighboring communities have remained predominantly low-density and single family with little to no increases in rental supply. This mismatch between regional housing demand and regional housing needs has likely had a far greater impact on Norwalk's rental housing prices than its production of market rate units. Moreover, as mentioned, the City's market rate housing generated at least some level of affordable housing as a result of inclusionary housing regulations.

To better meet its local housing needs, Norwalk should explore ways that it can address underserved segments of the housing market. Revising the City's inclusionary housing regulations to require more affordable units and at deeper levels of affordability could help attract developers to Norwalk who are better equipped at developing truly mixed-income projects and qualifying for affordable housing financing programs. Additionally, mixed-income projects with strong economic development benefits as well as deep levels of affordability should be fast-tracked through the development approval process, receive tax abatements, and granted density bonuses.

Norwalk should also continue to advocate for increased production of rental housing at all price points by other localities in its surrounding region. This is not to suggest that Norwalk cannot or should not continue to increase its own housing supply. But if the rental housing supply increased regionally, it would help Norwalk maintain a higher available inventory of its older housing stock at lower price points.

7. All kinds of rental housing are needed but there is an especially acute need for affordable two-bedroom rental apartments and family sized units.

Input gathered from renters and real estate brokers along with analysis of listings data suggests a shortage of affordable rental apartments for all unit types including studios, one-bedroom apartments, and two-bedroom apartments. However, it is noteworthy that affordable two-bedroom apartments are especially in rare supply and that the median price of a two-bedroom has increased by 31% from \$1,950 in 2014 to \$2,825 in 2023.

During the outreach process for the housing needs assessment, both residents and real estate brokers broadly emphasized the undersupply of affordable two-bedroom

apartments and their desirability amongst young couples and starter families without the means to purchase a home. Another growing market for two-bedrooms are seniors who represent almost 1/5th of the city's population. Between 2012 and 2022, the city's senior population grew by 30% or 3,830 individuals. Facing diminishing incomes and rising tax burdens, two-bedroom rentals are an ideal housing type for seniors seeking to reduce overhead expenses and have room for other family members, visitors, or live-in caretakers.

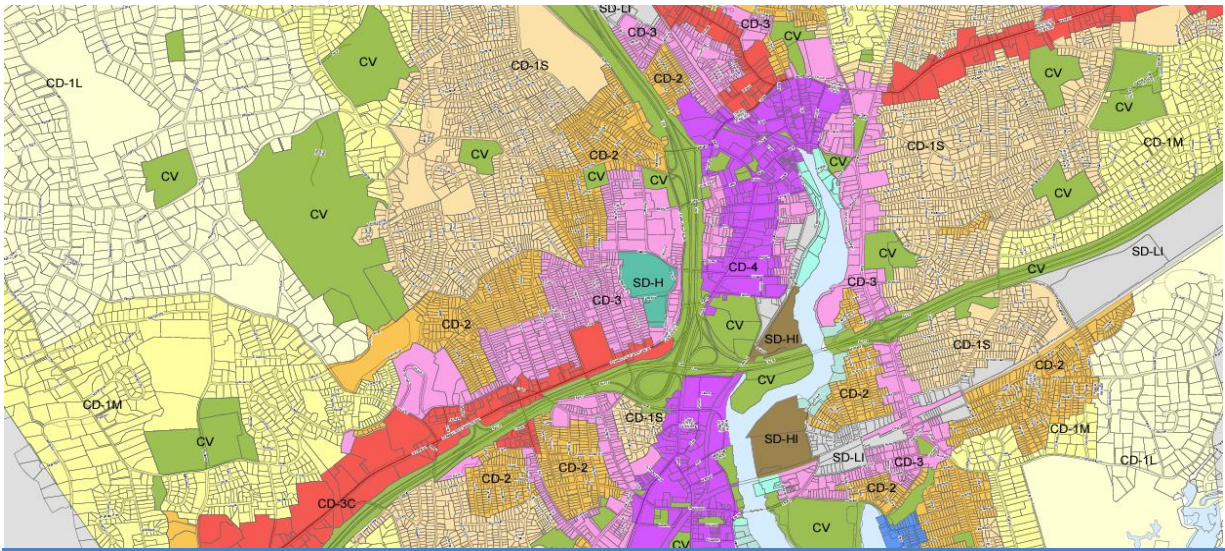
It should not be overlooked, however, that almost 40% of Norwalk's renters live alone. Interviews with housing providers observed that lower-income singles are in great need for affordable studio apartments.

Norwalk has limited ability to control the unit mix of private housing development. However, in its disposition of City-owned land and forging of development partnerships with the Redevelopment Agency, Norwalk Housing Authority, and the non-profit housing developers, the City has an opportunity to pursue higher-density rental buildings with a mix of units that represents the diversity of household types living in Norwalk.

8. The City needs to continue advancing housing linked to transit, walkable neighborhoods, and economic development strategies.

The housing needs assessment did not include an evaluation of potential development sites for new housing. And during the outreach process, neither residents nor stakeholders offered many suggestions for specific sites they thought should be redeveloped as housing. However, both residents and stakeholders broadly expressed a strong need for expanded mass transit options and the interlinking of new housing development with frequent and fast transit connections to both local and regional destinations. With current levels of transit utilization under 2% for work trips to Norwalk job sites, the city is far from being transit accessible.

The City's move toward creating transit-oriented districts and completion of the new Merritt 7 rail station are steps in the right direction of enabling transit supportive densities. However, the City will need to dramatically increase the speed and coverage of its local transit service and integrate job-generating commercial development with housing development in order to expand housing supply without worsening traffic levels. More robust transit service would also help to reduce the transportation costs for households by reducing their need for an automobile while also allowing developers to build new housing with less parking and thereby bring down housing costs.



LAND USE AND ZONING ANALYSIS

LAND USE

Norwalk is a coastal city with diverse neighborhoods—including urban and suburban areas. The existing Land Use Map below (see **Figure 1**) highlights Norwalk’s development patterns, with concentrations of mixed-use higher-density development in areas like SoNo and Wall Street, commercial corridors along Route 1 and Route 7, mixed density neighborhoods like Spring Hill and East Norwalk, and single-family neighborhoods throughout the City. Norwalk is substantially developed, with limited acres of undeveloped or underutilized land. Approximately **65 percent** of the total land area in Norwalk is zoned for single-family homes, seven percent permits two-family homes, and 13 percent permits mixed-use development. The remaining land area is zoned for commercial, industrial, and government uses. Of the land zoned for residential use, 77 percent is dedicated to single-family development. With such a large proportion of land zoned for single-family development, the ability to continue to add to the housing stock is limited.

**Percent of Land Area
by Allowable Zoning Use**

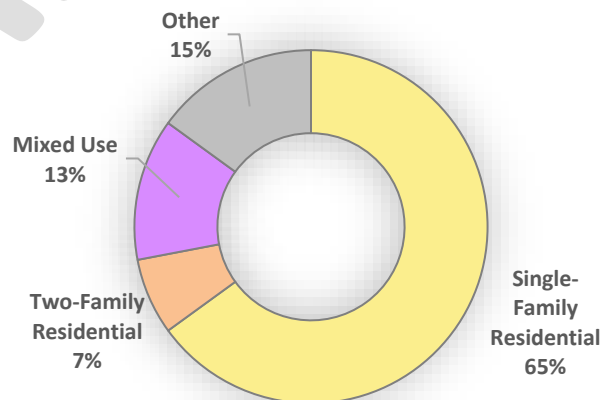
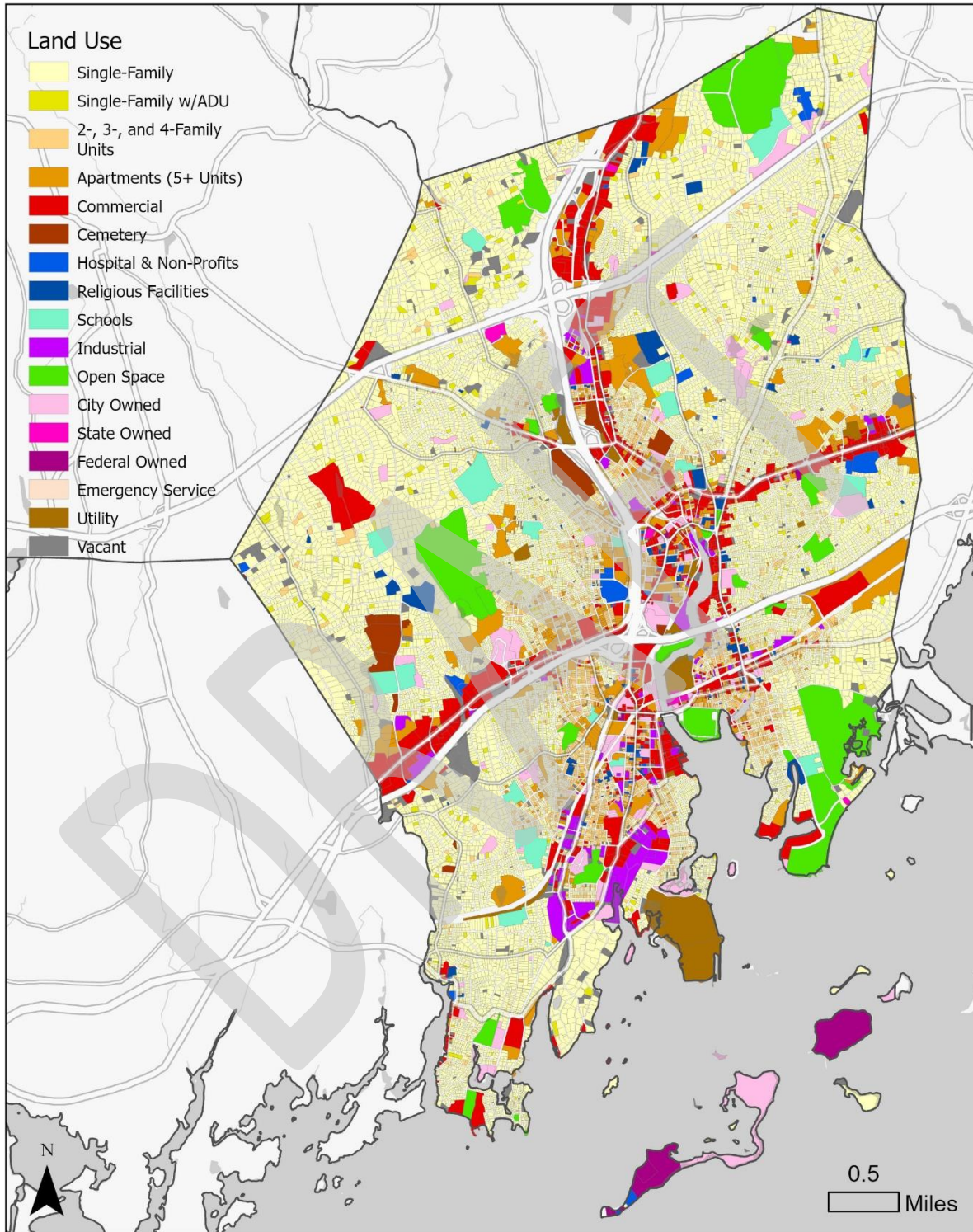
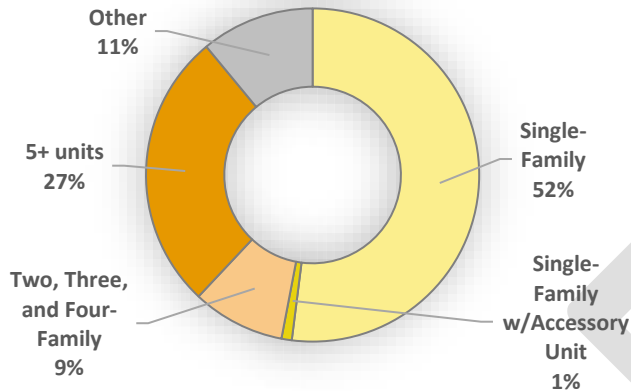


Figure 1: Existing Land Use Map



Source: City of Norwalk, Esri, TomTom, SafeGraph, Geotechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Percent of Parcels by Land Use



Accessory dwelling units (ADUs) do allow the creation of some new units within the areas zoned for single-family housing, however only one percent of existing single-family homes have ADUs. This could be due to several factors including the requirement for an additional parking space, limitations on the size and location, and the physical limitations of individual properties, as well as homeowner preference.

Nationally, several major cities that relaxed their ADU regulations

experienced an increase in ADU production. For example, Seattle Washington updated its ADU regulations in 2019, including providing pre-approved detached ADU plans. In the four years prior to changing the regulations ADU permitting averaged 263 units annually. Following the regulatory changes, annual ADU permits increased steadily to 482 in 2020 to 987 permits in 2023.¹

South Norwalk and Downtown/Town Green have the highest concentration of mixed-use and multi-family developments within the City and are more urban in scale. These neighborhoods are higher density and have a mix of uses including single-family residential; multifamily residential; civic and institutional; and commercial. South Norwalk also has some industrial uses. There is a growing concentration of multi-family residential along the Route 7 corridor north of the Merritt Parkway. This area has access to the Merritt 7 Train Station on the Danbury Metro-North line and is in an area that was previously dominated by office park uses. East Norwalk and the Spring Hill/Hospital area are characterized by a mix of uses. Zoning in these areas allows for low- and medium-density residential, interspersed with institutional, commercial, and industrial uses.

A substantial portion of Norwalk's land area is made up of suburban single-family residential neighborhoods. Lot sizes nearer to Downtown, South Norwalk, and Calf Pasture tend to be smaller, with larger lot sizes in the West Norwalk, Cranbury, Rowayton and Silvermine neighborhoods. These neighborhoods are characterized by low density residential, with large

¹ Accessory Dwelling Units 2023 Annual Report, July 2024. OPCD-ADU-Report-2023.pdf

residential lots interspersed with civic and institutional uses such as churches, schools, and parks.

Some of the denser neighborhoods with older housing stock, such as Spring Hill and South Norwalk, have “naturally affordable” housing units which are not income restricted, but may be older, smaller, or lack amenities and are therefore less expensive than newer luxury units or single-family homes.



Example in Norwalk’s Spring Hill neighborhood of a single-family dwelling in a CD-3 zoning district with varied housing types.



Example of a single-family dwelling in Norwalk's CD-1L zoning district, which has the largest lot requirements in the city.

Approximately seven percent of the land in Norwalk is zoned for commercial purposes. Norwalk is currently experiencing high office vacancy rates. In Quarter 1 (Q1) of 2024, commercial office vacancy rates were 42 percent, notably higher than the overall 28.2 percent vacancy rate in Fairfield County.¹ Prior to the pandemic (Q4 of 2019) Norwalk's office vacancy rate was 35 percent.² Long-term high vacancy rates in the commercial office market point to properties that could be converted to housing, whether as a complete redevelopment or adaptive reuse.

UNDERUTILIZED LAND

An analysis of underutilized land was conducted to identify areas that could potentially support housing development. For the purposes of this analysis, underutilized land included:

- Vacant land
- Surface parking lots
- Low-rise buildings where zoning allows for substantially taller structures

¹ *Cushman & Wakefield Research Publication (2024) 'Marketbeat Fairfield County Office Q2 2024'.*

² *Cushman & Wakefield Research Publication (2019) 'Marketbeat Fairfield County Office Q2 2019'.*

- Underutilized municipal property (but not parkland)
- Vacant buildings (e.g., office parks, retail)

The Underutilized Land Map (see **Figure 2**) identifies parcels that have the potential to support additional growth under Norwalk's recently adopted Zoning Code. The map also shows local, state, and national historic districts that overlap underutilized parcels. Norwalk values its historic properties and districts, as they further Norwalk's unique identity and sense of place. Redevelopment within historic districts would need to be sensitive to the historic character and contributing features of that district. In addition, historic structures may not be able to realize the full build-out potential under the zoning due to their preservation value and historical significance. As shown on the map, potential growth areas are concentrated along the Route 7/Main Avenue and Route 1 corridors, which have a substantial amount of commercial and retail activity, as well as South Norwalk and Downtown. The Community District CD-4 (CD-4) Zoning District permits a maximum height of 6.5 stories. The parcels identified on the Underutilized Land Map have structures that are less than 3 stories, presenting an opportunity for vertical development, including additional housing. The CD-4 parcels are primarily located in Downtown, South Norwalk, and near the Merritt 7 Train Station.

The Community District CD-3C (CD-3C) Zoning District permits a maximum height of 4 stories. The parcels identified on the Underutilized Land Map have structures that are less than 2 stories, presenting an opportunity for vertical development, including additional housing. These CD-3 parcels are concentrated along the Route 1 and Route 7/Main Avenue corridors. The Route 1 corridor between the Darien border and Route 7 is dominated by big box retailers, strip retail centers, and some commercial office space. A large percentage of these buildings are one to two stories and some sit within underutilized parking lots.

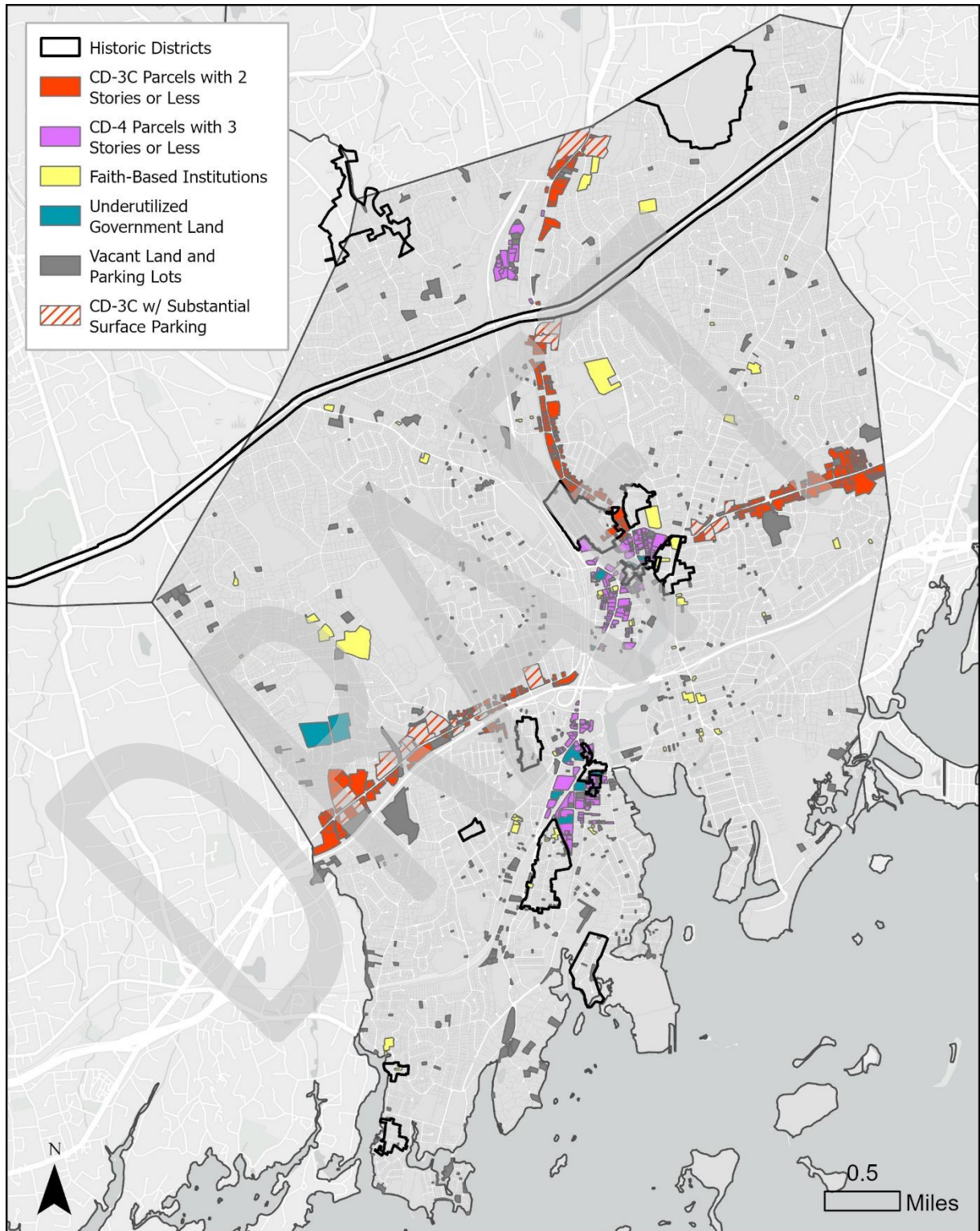
The Route 1 corridor between the Darien border and Route 7 is dominated by big box retailers (Costco, Home Depot, Kohl's), strip retail centers, fast food and fast casual restaurants, and medical office space. A large percentage of these buildings are one- to two-stories and set back from the roadway behind underutilized parking lots with limited landscaping. During a windshield survey performed in August 2024, one new multi-family development along this corridor was observed (71 Connecticut Avenue, three-story residential building above surface-level parking). The Route 1 corridor between Route 7 and the Westport border is also heavily commercial, but has a wider mix of large floorplan retailers, retail centers, smaller commercial spaces, and fast-food establishments. The buildings along this corridor are also predominantly one- to two-stories.



Route 1 corridor, near the intersection of Keeler Ave., in the Norwalk CD-3C District.

Based on the August 2024 windshield survey, commercial vacancy along the Route 1 corridor appears to be relatively low, and active construction for three major retailers was observed on Route 1 near I-95 exit 13, including the development of a Wegmans grocery store (675 Connecticut Avenue) and a Target (in the space of a former Walmart at 680 Connecticut Avenue).

Figure 2. Underutilized Land Map



Source: City of Norwalk, Connecticut Department of Energy and Environmental Protection GIS Open Data Website, Esri, TomTom, SafeGraph, Geotechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Main Avenue between Route 1 and the Merritt Parkway is characterized by smaller retail centers, restaurants, and small- to mid-sized commercial buildings. There is a big box center just south of the Merritt Parkway with a vacancy and oversized parking lot that has some redevelopment potential. The area just north of the Merritt Parkway is fairly built-out with office and new multi-family residential, particularly on the west side of Main Avenue. Potential for redevelopment beyond what is already contemplated may be more limited in the near term.

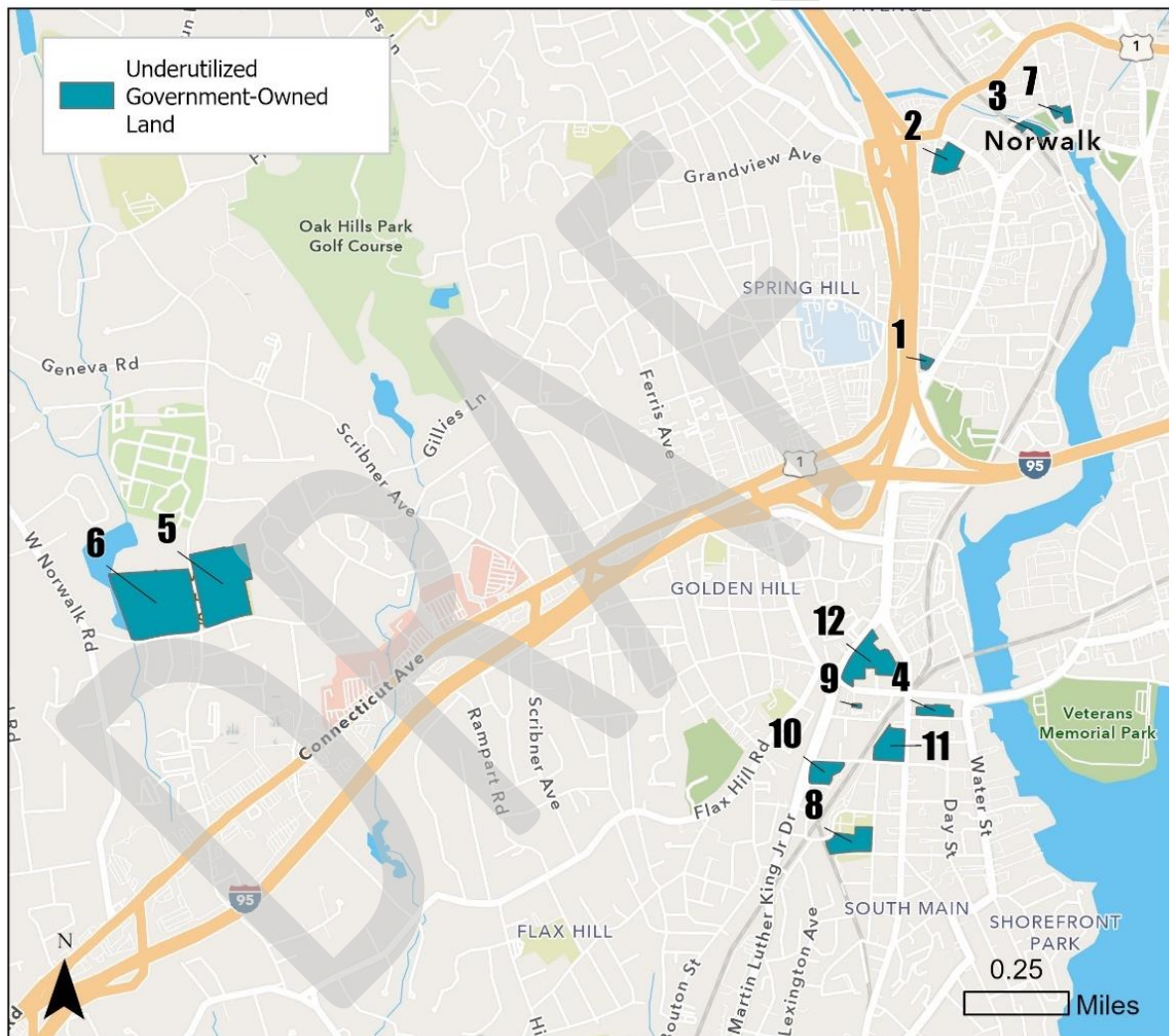


Example of an existing CD-3C parcel that is considered underutilized because the site is permitted to have buildings up to 4 stories high.

The Underutilized Land Map also identifies parcels with large surface parking lots, many of which were observed to be underutilized during the August 2024 windshield survey. Surface parking lots are considered potential redevelopment sites because many areas are “overparked” – meaning that the amount of parking provided is significantly greater than the demand. Redeveloping unnecessary parking areas for residential use is more environmentally friendly than developing existing green or open spaces, and structured parking can be developed as necessary to allow for larger building footprints. This approach is consistent with the City’s recent zoning changes which lowered some of the required parking, put a cap on the amount of parking required, and requires parking in the rear of buildings in certain districts to improve the streetscape and pedestrian atmosphere.

Throughout the country, faith-based institutions have become partners in developing affordable housing.¹ Such developments are often located on large lots and in existing residential areas. The Underutilized Land Map shows several large faith-based properties where public-private partnerships may be feasible.

Figure 3. Underutilized Government Owned Land



Source: City of Norwalk, Esri, TomTom, SafeGraph, Geotechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Underutilized publicly owned land provides opportunities for public-private partnerships to develop new affordable housing. The Underutilized Government Owned Land map and

¹ Freed, S. (2024) 'Amid a Housing Crunch, Religious Groups Unlock Land to Build Homes', *New York Times*, 24 January.

corresponding table (see **Figure 3** and **Table 1**) identifies government-owned parcels that do not maximize the buildable area under the zoning or contain substantial areas of surface parking. All of the parcels are located in the Civic District (CV) or CD-4 zoning districts.

The CV district is assigned to areas designated for civic purposes owned by a Governmental Agency, or land dedicated and deed restricted as Open Space. Allowable uses include civic purposes such as city halls, post offices, libraries, places of assembly, schools, and community centers. Multi-family affordable housing development on the parcels would require a zoning text or map amendment. As discussed above, the CD-4 zoning district permits multi-family housing and structures up to 6.5 stories. As such, redevelopment of these parcels could proceed under the current regulations. **Table 1** provides additional context for each of the parcels and discusses the redevelopment potential.

Table 1 Underutilized Government owned Land						
Map Point	Address	Use	Owner	Acres	Zoning District	Considerations and Challenges
1	340 and 350 West Ave.	Parking Lot	City of Norwalk	0.64	CV	This City-owned surface parking lot abuts the Norwalk River Valley Trail (NRVT) and CT Route 7 just north of the I-95 interchange. The site has been considered for redevelopment in the past, in particular in conjunction with the redevelopment of the adjacent former YMCA. The site currently provides overflow parking for the Lockwood Mathews Mansion Museum across the street. Potential challenges include the displacement of parking for civic uses in the area.
2	17 Belden Ave.	Norwalk Courthouse	State of Connecticut	2.39	CV	The Norwalk Courthouse is a one-story building with a substantial amount of surface parking (approximately 50% of the lot area). The courthouse has been temporarily closed since 2022. Future redevelopment would require a partnership with the State of Connecticut which owns the property, which has not yet determined its long-term plans for the site.
3	46 Wall St.	Parking Lot	City of Norwalk	0.72	CD-4	This municipal surface parking lot is located along the Norwalk River and serves the surrounding retail shops. This site may be suitable for future redevelopment, particularly given its location in an active area. Future redevelopment would likely need to include municipal parking to meet existing parking needs. In addition, this site is located in an area that experiences flooding. Potential flooding

						impacts would need to be addressed in any future redevelopment plans.
4	5 Haviland St.	Parking structure	City of Norwalk	3.59	CV	The Haviland Parking Deck is two levels of paid parking near the waterfront and serves the SoNo area. The site may have potential for redevelopment, particularly due to its location in an active area. The current parking structure is not able to hold additional levels of construction. Future redevelopment would likely need to replace the existing structure and include municipal parking to meet existing parking needs.
5	188 Richards Ave.	Norwalk Community College	State of Connecticut	13.87	CV	Both 181 and 188 Richards Ave are utilized by Norwalk Community College. The lots contain campus buildings and substantial surface parking, which is underutilized. The underutilized parking areas may be suitable for future development, such as student or faculty housing. Future development would require a partnership with the State of Connecticut which owns the property, as well as an analysis of deed restrictions regarding the use of the property. In addition, the site contains wetland and wetland buffer areas which would need to be considered in redevelopment plans.
6	181 Richards Ave.	Norwalk Community College	State of Connecticut	17	CV	See 188 Richards Ave., above.
7	20 Main St.	Parking Lot	City of Norwalk	0.91	CD-4	This large municipal surface parking lot is located near the Norwalk River and Irving Freese Park (pocket park) and serves the surrounding commercial area. The site has potential for future redevelopment. Future redevelopment would likely need to include municipal parking to meet existing parking needs of this active commercial area.
8	46 Concord St.	Elementary School	City of Norwalk	3.25	CV	This site contains the Columbus Magnet School and a large underutilized parking area. The underutilized parking area may be suitable for future redevelopment in the as it is located in the SoNo neighborhood and walkable to the train station. However, the school and associated parking lot is planned to be used in the near term as swing space during the construction of other Norwalk schools. Therefore, it is unavailable for redevelopment in the near to medium term. In the long term,

						future development would need to preserve adequate space for the use of the building and its outdoor recreation and parking needs. Future redevelopment of the parking area could also be considered as part of a larger redevelopment of the surrounding area.
9	12 Washington St.	Parking Lot	City of Norwalk	0.1	CV	Located behind the SoNo Branch Library, this small parking lot may not be suitable for redevelopment due to size constraints.
10	26 Monroe St.	Multi-Family	City of Norwalk	2.18	CD-4	This property is currently developed with NHA senior housing, which is 4 stories and 48 units, parking, and a unused open lawn space. The existing building could be expanded by adding up to 2.5 stories, as the maximum permitted height in the in the CD-4 district is 6.5 stories. A portion of the underutilized lawn space may also be suitable for new construction. The site is directly adjacent to the SoNo Metro North train station.
11	1 Monroe St.	Police Department	City of Norwalk	3.01	CV	This property contains the Norwalk Police Station and a large parking lot, which is underutilized. A portion of the parking lot may have the potential for future redevelopment. The site is walkable to the SoNo Metro North train station. Adequate parking for all Police Department functions and needs would need to be considered in any future redevelopment plans, in addition to adequate security measures.
12	55 Dr. Martin Luther King Jr Dr.	Parking Lot	City of Norwalk	4.97	CD-4	This large surface parking lot is located the SoNo neighborhood and serves the surrounding commercial uses. The site is within walking distance to the train station. Future redevelopment would likely need to include municipal parking to meet existing parking needs.

ZONING ASSESSMENT

Zoning regulations guide development within the City and affect the amount and type of housing that can be constructed. Regulations that permit a balance of housing types, including single-family, missing middle (e.g., duplex, triplex, and townhouse units), and higher-density buildings are necessary to facilitate a diversity of housing stock and meet housing demand. The ability to construct new housing directly affects housing supply and housing affordability.

The City of Norwalk recently underwent a complete update of its zoning ordinance and map (see **Figure 4**). The changes reduce the number of zoning districts, implement a form-based code, and take steps to break down barriers to the creation of affordable housing. While the previous code permitted accessory dwelling units, this update permits them in all residential community districts and amends their governing regulations. In addition, the new zoning expands locations where duplexes or two-family dwellings are permitted and establishes stronger inclusionary zoning standards. It also includes some overlay districts to facilitate affordable housing by promoting a mix of residential uses and higher densities. For example, the East Norwalk Village TOD Overlay (O-EVTZ) promotes a mix of residential in appropriate village clusters and within walking distance of the train station and village area. The Merritt Station Village District Overlay (O-MSVD) promotes density near mass transit.

Accessory dwelling units are permitted by-right with restrictions in all Community Districts (CD). An additional parking space is required for all accessory dwelling units and site plan approval is required for detached units. The regulations limit the size of detached units to 700 square feet (SF) and attached units to 1,000 SF. The property must still maintain the look of a single-family dwelling, and the owner is required to reside on the property. Requirements such as site plan approval, and the provision of an additional parking space add costs and potential barriers to building an accessory dwelling units. Requiring an additional parking space may be an unnecessary increase in impervious surface in locations where on street parking or public transportation



Example of a large, multifamily building in the CD-3C district in Norwalk. This building provides condominium ownership, a type of ownership opportunity we heard residents say they want more of.

is available. The strict size limitations do not allow for diversity in size or bedroom count, limiting their availability to certain groups.

The new zoning includes the CD-2 (Sub-Urban Single- and Two-Family Community District) which consists of primarily low density single-family detached and two-family residential areas. It has medium-to-deep front setbacks and medium-to-wide side setbacks. This new district expanded areas where two-family units are permitted. However, it does not permit townhomes or other missing middle housing types. The boundaries of the CD-2 district could be further expanded to encompass adjacent areas zoned CD-1M (Sub-Urban Medium Lot Community District) and CD-1S (Sub-Urban Single Family Community District) that have pre-existing duplexes. The CD-1M and CD-1S are both single-family districts on medium and small lots, respectively. In particular, there are concentrations of duplexes in the CD-1S districts near South Norwalk, East Norwalk, Hospital Hill, and the neighborhood in the Historic District (east of the Norwalk River). Similarly, certain CD-2 zoned areas could be amended to include an allowance for triplex (three-unit) and quadplexes (four-unit) residential uses. There are existing concentrations of triplex units in the CD-2 districts located in the Hospital Hill neighborhood, South Norwalk, and East Norwalk.



Regional example of two neighboring two-family homes that are similar in scale and architectural detail to a single-family home.

The prohibition of missing middle housing and the large lot size and dimensional requirements for the CD-1L (Sub-Urban – Large Lot) and CD-1M districts inhibit the ability to create entry level homeownership opportunities. There is limited available land in Norwalk, and the cost of land is high. Requiring larger lot sizes constricts the supply of available land. A fundamental economic principle is that limited supply with growing demand results in increased prices. Smaller lot sizes, smaller dimensional requirements, and the ability to construct missing middle housing types such as duplexes and townhomes, allows for increased supply on the same amount of limited land. The CD-1L district has a minimum lot size of 1 acre, maximum 25% -30% impervious surface coverage, and only allows for single-family dwellings and an accessory dwelling unit. The CD-1M district has a smaller lot size requirement of 12,500 SF, however lots in the CD-1S district are as small as 6,250 SF. The City could consider reducing the minimum lot size and lot widths to facilitate some additional density in these areas.

The new zoning regulations expanded inclusionary zoning requirements. Under the new regulations developments with three to nine units are required to have one inclusionary zoning unit for those earning 80% state median income (SMI) or less or pay an inclusionary zoning fee that would go to construct or rehabilitate housing for those earning 60% SMI. Developments with ten units or more are required to have a minimum of 10% of the units affordable to households earning no more than 60% SMI, or 80% SMI if the developer also pays an inclusionary zoning fee. Inclusionary zoning regulations were also expanded to require an inclusionary zoning fee for any non-residential development over 25,000 SF. It will be important to monitor the success of these regulations in generating affordable housing. The required set asides, inclusionary zoning fees, and SMI percentages should be reviewed on an annual basis to see if they should be adjusted to respond to market conditions. In addition, the City can consider density bonuses for the provision of affordable or moderate income housing above and beyond the minimum requirements. Density bonuses could be targeted to the housing types that are in greatest need – such as 2 and 3 bedroom or deeply affordable units. Deeply affordable units target households with less than 60% SMI.

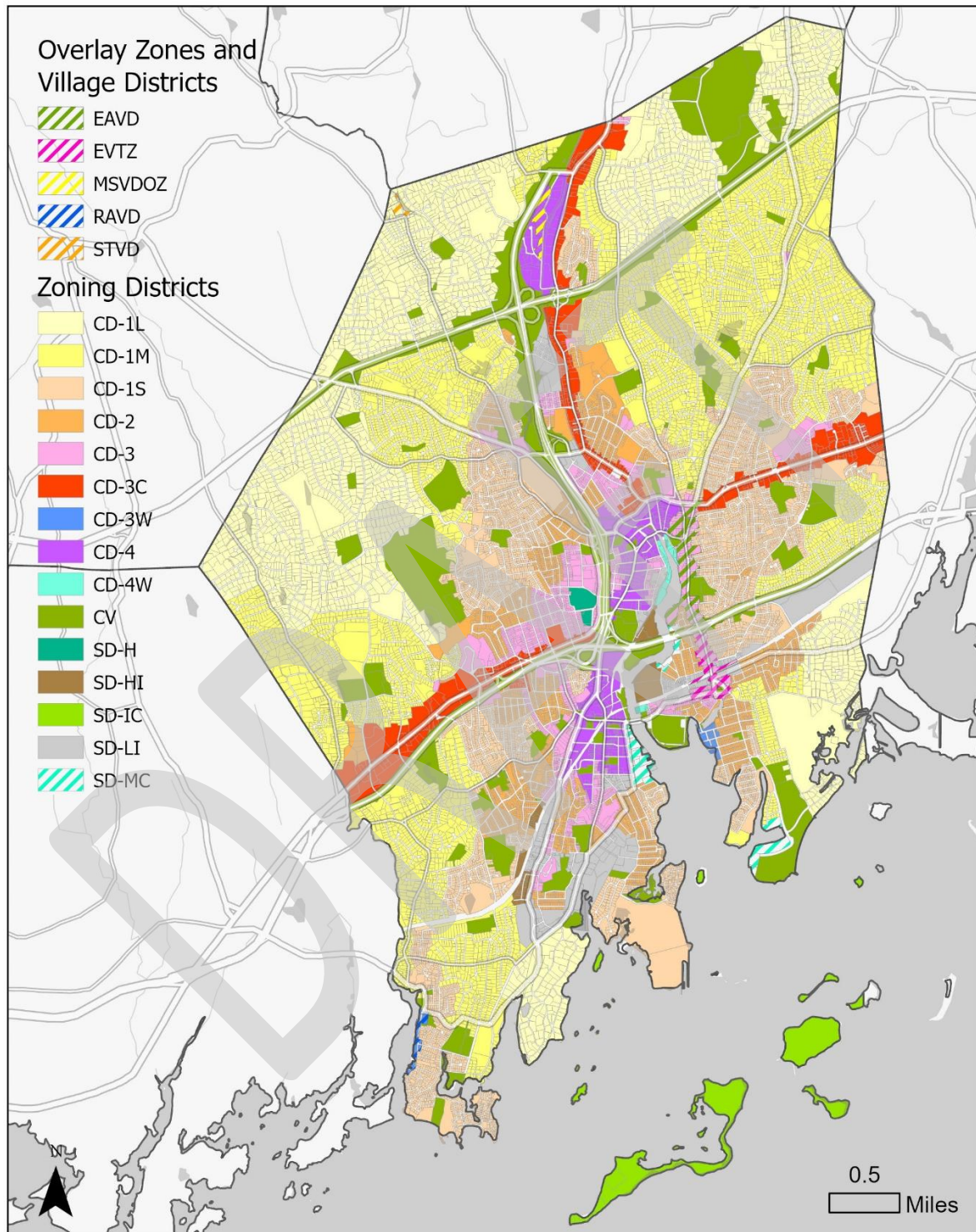


Examples of developments that would be subject to workforce housing standards near Norwalk Hospital.



Some zoning regulations have indirect effects on the creation of affordable housing. For example, the zoning regulations limit the height of an accessory structure to 20 feet at the peak of the roof in a residential district. This height restriction has the potential to inhibit the ability to create an accessory dwelling above a detached garage. Measuring the height to the midline of the roof could avoid this concern.

Figure 4. 2024 Zoning Map



Source: City of Norwalk, Esri, TomTom, SafeGraph, Geotechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

In addition, the City can consider adding alternative housing types, such as single-room occupancy buildings, as permitted uses in certain zoning districts. Single-room occupancy buildings typically contain single rooms without a bathroom, kitchen, or shower, and share a common kitchen and bathroom (similar to a dormitory). This type of use could help target those in need of deeply affordable places to live.

PROJECT SPOTLIGHT: *40 SOUTH MAIN*

The Human Services Council operates 40 South Main Street, a transformative housing initiative located in South Norwalk. This 44-unit single-room occupancy building has provided deeply affordable transitional housing units to the Norwalk community since 1996. It also provides a pathway to stability, job training, and community support.



There is also a need for supportive housing in Norwalk. Supportive housing is a combination of affordable housing and social services, typically administered by a not for profit or government entity. The purpose of supportive housing is to address barriers to housing for people who are formerly unhoused, disabled, or facing other hardships. Social services are provided onsite to help people achieve stability, regain independence, and transition to permanent housing. In Norwalk, supportive housing services are provided by the Human

Services Council.¹ While supportive housing is not specifically defined in Norwalk’s zoning ordinance, it would be permitted in locations where community residences, congregate housing, elderly housing, halfway housing, and mixed-use multi-family would be permitted.

While the new form-based zoning code includes provisions for missing middle housing such as duplexes, townhomes, and small multifamily buildings, the locations in which these types of units are permitted could be expanded. Form-based codes are built on the premise that different types of uses should be permitted provided they fit the character—or form—of the neighborhood. Through the

form-based code, duplexes, triplexes, and quads could be achieved in traditionally single-family neighborhoods with little effect on the surrounding character. This is achieved through regulating the design, form, setbacks, and other physical characteristics of the structure. For example, a single-



Regional Example of Quad Housing that looks like a large single-family home

family home could be 5,000

square feet and take up the entire building envelope on a site, or a building of the exact size and of similar character could have 5 units in it. If the medium density housing development can meet the parking requirements as well as any other additional requirements, and it generally looks the same, a model form-based code would allow for both.

The large amount of land committed to single-family homes not only in Norwalk, but the greater Fairfield County region, is an obstacle in expanding affordable housing. Zoning tools such as form-based codes that allow for missing middle housing can help facilitate additional housing production on a scale that allows for homeownership opportunities and maintains neighborhood and community character.

Parking regulations can also affect the ability to construct affordable housing. Parking requires land, which is a limited resource. In addition, structured parking is costly to construct. The cost incurred by developers to meet parking requirements directly impacts the cost of housing. The new zoning regulations permit shared parking reductions and reduced parking requirements for large multi-family developments and mixed-use projects near the

¹ <https://hscct.org/program/supportive-housing/>

East Norwalk, SoNo, and Merritt 7 Train Stations, as well as the Norwalk Transit Hub. There are now two districts, the CD-4 and CD-4W, that have no minimum parking requirements. Reducing parking requirements was an important step to minimizing barriers to affordable housing. However, the effect of these new regulations should be revisited annually.

Streamlining development approvals is another tool that can help facilitate the construction of new housing stock. Streamlining measures can include making more types of applications administrative reviews as opposed to requiring site plan approval from the Planning and Zoning Commission and establishing a prescribed impact fee schedule that creates certainty in development costs. Regionally, the City of New Rochelle, NY established a Downtown Overlay Zoning District and Community Benefits Policy specifically designed to fast-track development and generate new housing downtown. New Rochelle did a substantial amount of due diligence up front through the preparation of a Generic Environmental Impact Statement that analyzed potential traffic, infrastructure, school, and other impacts that could result from new development. Through this they established new zoning to provide a clear roadmap for investment to developers and property owners, that also included design standards and community benefit requirements to establish a thriving, attractive, and sustainable city center. A “Fair Share Mitigation Fund” was created to ensure that new development covered public costs associated with growth and that there was a net benefit to tax payers.¹ Undertaking upfront development studies and establishing clear metrics for required community benefits and fair share mitigation are steps that Norwalk could consider to facilitate more housing construction.

EXISTING HOUSING PROGRAMS

NORWALK HOUSING AUTHORITY

The Norwalk Housing Authority (NHA) manages approximately 853 units, usually 30 percent and below the area median income. These units are spread over 18 developments, seven of which are restricted to seniors, and some of which are currently under redevelopment. The majority of these units are within the urban core.

A recent significant redevelopment is Washington Village in South Norwalk. Washington Village, a former low-income public housing development, has been replaced with a mixed-income development known as Soundview Landing. The redevelopment project included 136

¹ <https://www.newrochelleny.com/1015/TOD-Downtown-Cluster>

replacement public housing units, 67 income-restricted housing units, and 70 market-rate units.

Additionally, the NHA has completed the expansion of Colonial Village, within the Route 1 Corridor, for a total of 269 affordable units across 27 buildings. The development also included a 5,400-square-foot Colonial Village Learning Center, which provides K-12 educational support. Adjacent to Colonial Village, construction is underway for Oak Grove, a US Housing and Urban Development (HUD) project, that will add 69 units of affordable housing and new NHA-managed Learning Center.

While the majority of the units managed by the NHA are in the urban core, the NHA also issues Section 8 vouchers which allow people to rent in more suburban areas, or areas of traditionally higher income.

NORWALK REDEVELOPMENT AGENCY

Housing stabilization is an important part of the City's affordable housing goals. The Norwalk Redevelopment Agency created the Norwalk Renovation Program to implement a pilot program that purchased homes to rehabilitate as two-family homes. These homes were then sold as deed-restricted, creating for-ownership affordable housing.

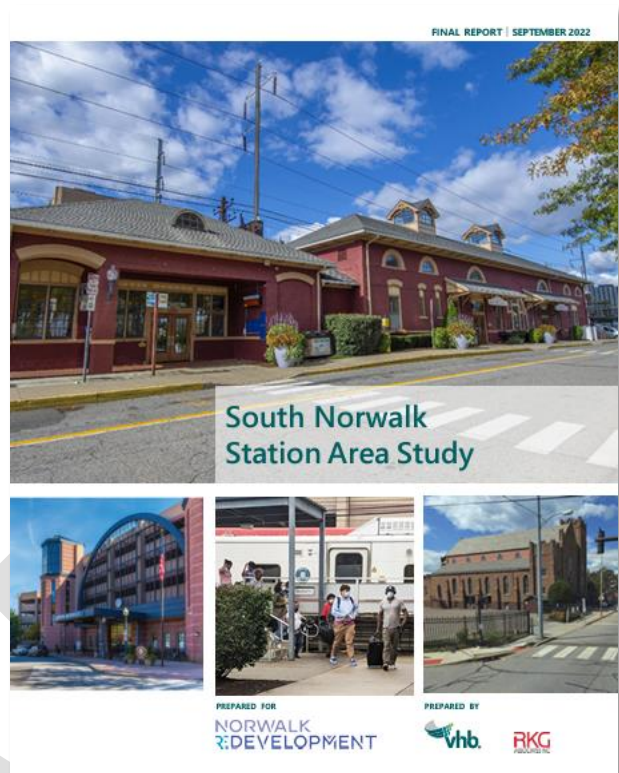
EXISTING POLICY DOCUMENTS

SOUTH NORWALK STATION AREA STUDY 2020-2022

The South Norwalk Station Area Study was undertaken by the Norwalk Redevelopment Agency and the City of Norwalk to promote growth around transportation assets such as the train station. It expands and updates the South Norwalk TOD Redevelopment Plan, adopted in 2016, after the City rezoned South Norwalk (SoNo) to include affordable housing requirements.

The first recommendation of the plan is to couple the city's affordable housing requirements in the zoning ordinance with assistance programs providing down payments for low and moderate-income households. The second recommendation is to establish a Community Land Trust (CLT), which would be either a community or non-profit body that would purchase homes for resale at affordable prices. The CLT would retain the ownership of the land and would ensure deed restrictions would be in place on the building so as to cap resale prices and keep them affordable.

Another incentive to encourage affordable housing is density bonuses. In exchange for a developer building more affordable housing or housing for those of even lower income than required, they get additional density that otherwise would not be allowed by-right. The final option that the plan gives are limited-equity housing co-ops in which resale of condominium style units would be limited to keep them affordable. The plan also recommends a homebuyer education program to help potential new homeowners learn what buying a house entails, as well as potential funding sources.



PLAN OF CONSERVATION AND DEVELOPMENT (CITYWIDE PLAN 2019-2029)

Norwalk's Plan of Conservation and Development (POCD), titled Citywide Plan 2019-2029, was compiled with public input, as well as review and discussion by the Oversight Committee and the Planning Commission. The POCD lays out an implementation matrix for the next ten years and defines a vision that specifically calls for varied housing choices for a range of demographics and income levels. Affordable housing was a high priority theme identified by constituents and officials alike and the POCD identified a disproportionate impact and need on minority populations, the elderly, and the very low-income population that needs to be addressed.

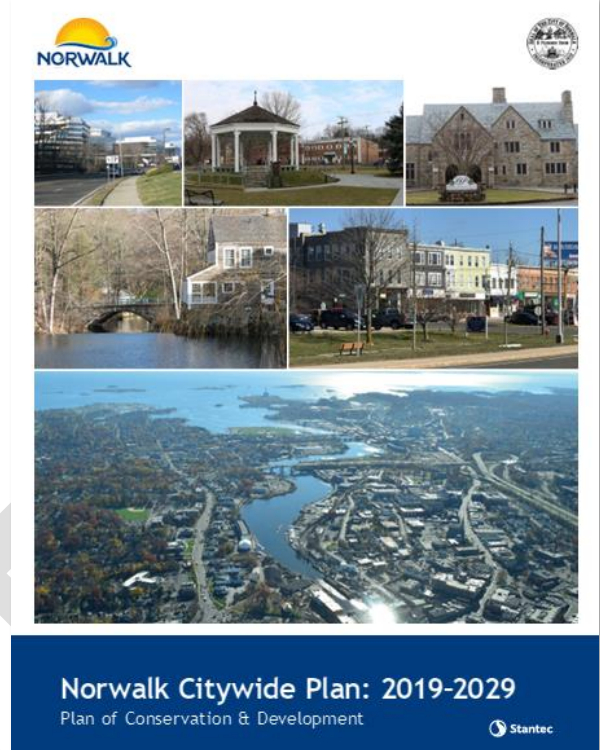
Even though the POCD notes that the City of Norwalk is meeting the requirement from the State of Connecticut that 10 percent of housing units are affordable, as well as its relative affordability compared to the region, the POCD states that 22 percent of households are severely housing cost burdened, and 45 percent are cost burdened. The POCD also acknowledges that even though the state threshold has been met, work is needed to expand options to a wider range of income levels. It also states that in low-income households (88

percent renter occupied and 76 percent of owner-occupied units) experience overcrowding, and others are turning to illegal housing.

Several implementation goals related to affordable housing came out of the POCD. The POCD immediately called for a comprehensive housing policy that addressed varied types of housing, from suburban, single-family homes, to urban, walkable, mixed-use areas to ensure vibrant, healthy, and sustainable neighborhoods. It also suggested conducting a housing study and instituting an implementation structure within the City and across different entities to continue to expand affordable housing opportunities. The following are actions the City of Norwalk identified through the POCD to further affordable housing:

- Prepare Assessment of Fair Housing, as required by the U.S. Dept. of Housing and Urban Development (HUD);
- Ensure existing affordable units stay affordable;
- Institute a Housing Policy Advisory Committee;
- Create a Norwalk Housing Plan, and within that an affordable housing strategy;
- Incorporate live-work units for the artisan community;
- Explore innovative solutions such as a Limited Equity Cooperative or Community Land Trust;
- Evaluate a guaranteed security deposit program for renters;
- Grow programs similar to the South Norwalk Renovation Program; and
- Remain within the State of Connecticut compliance threshold and continue to develop affordable housing.

The POCD states that creating housing options that allow the workforce to stay in the City has benefits such as reduced commutes and traffic. It also attracts a workforce population in addition to new residents, which are needed to support existing and future economic development. Through the planning process the public made it known that a priority was creating affordable housing around employment and transit centers, continuing the existing



affordability programs, and creating both affordable rental and homeownership opportunities.

The POCD included a short evaluation of different affordable housing mechanisms already utilized within the City and stated that Norwalk has 4,363 housing units that are below market-rate, achieved/maintained through an array of mechanisms including the City's public housing stock (approximately 853 units operated by the Norwalk Housing Authority, including the availability of housing vouchers), and moderate/affordable units built and operated by nonprofit organizations.

DRAFT

VISION, PRINCIPLES, GOALS, AND ACTIONS

This chapter builds on the key findings of the housing needs assessment and the community and stakeholder engagement process, to establish a vision statement, guiding principles, goals, and actions to implement the plan over the next 5 years.

HOUSING NEEDS ASSESSMENT KEY FINDINGS

The Housing Needs Assessment included the following key findings:

1. The City has a critical need to provide more affordable housing, social services, and economic pathways for its very low-income households.
2. There are some renters and homeowners at all income levels that are financially burdened by the high cost of housing in Norwalk.
3. The City needs to significantly expand the supply of rental housing that are affordable to households earning incomes less than \$75,000 per year, or 83% of Connecticut's median income of \$92,000. The analysis revealed that even where incomes exceeded the 8-30g threshold of 80% SMI, residents experienced difficulties securing affordable housing.
4. The City needs wider and more affordable options for homeownership.
5. Norwalk needs more housing to accommodate its workers including retail workers, public safety personnel, teachers, and hospital workers.
6. The City has a growing supply of new rental housing that serves the regional housing market but also fulfills local housing, quality of life and economic development needs.
7. All kinds of rental housing are needed but there is an especially acute need for affordable 2BR rental apartments and family sized units.
8. The City needs to continue advancing housing linked to transit, walkable neighborhoods, and economic development strategies.

COMMUNITY VALUES STATEMENT

Norwalk strives to be a city with housing accessible to all, a place where residents can live and work because of the affordable, diverse housing stock that accommodates the diversity of its population.

GUIDING PRINCIPLES

A common set of guiding principles emerged through the public engagement process. These principles were used to set goals for achieving housing opportunity, equity, health, sustainability, and inclusivity.

1. Norwalk is a diverse and inclusive city that strives to provide a diversity of housing types to meet the needs of all residents, as well as those who are employed in Norwalk and desire to live within the city.
2. Norwalk has a critical need to provide more affordable housing, social services, and economic pathways for its very low-income households. The market alone will not address this gap and public investment is required.
3. Norwalk recognizes that financial incentives such as tax abatements and grants are needed to bridge the market gap and facilitate the preservation and construction of quality affordable- and moderate income housing.
4. Norwalk recognizes that the housing crisis is a complex regional problem that requires partnerships with state and federal agencies to address its many fronts. Norwalk is committed to advancing equity in housing, and to addressing enduring racial disparities in income levels and housing access.

GOALS AND IMPLEMENTATION STRATEGY

The Affordable Housing Action Plan's goals and implementation strategy are presented in the matrix below. The goals and strategies are organized by theme, which includes:

1. Zoning and Land Use
2. Public Private Partnerships
3. Tax and Financing Innovations
4. Federal and State Advocacy

The implementation strategy identifies specific actions which are categorized as short-term, medium-term, and long-term. It also identifies the responsible party that would take the

lead in advancing the strategy. Within these actions, there are five called out as “high priority” – these are short- and medium-term items most critical to increasing the supply of affordable housing. These high priority items include:



Further incentivize construction of affordable- and moderate income housing through incentives (e.g., density bonuses, height increases, fee waivers, and tax abatements)



Public/private partnerships on City-owned land to develop new affordable units that meet Norwalk’s identified needs.



Develop a micro-grant program to preserve and update "naturally affordable units" (e.g., market rate units in older/less amenitized buildings) in exchange for deed restricted affordable units.



Establish an affordable housing property tax incentive policy for qualified affordable housing units (see CGS Section 12-65b) to incentivize the creation of new deed restricted affordable units, and the improvement/preservation of naturally occurring affordable housing units.



Advocate for more governmental funding for public and affordable housing.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges	
Zoning and Land Use						
Norwalk is a diverse and inclusive city that strives to provide a diversity of housing types to meet the needs of all residents, as well as those who are employed in Norwalk and desire to live within the city.	A. Update the City of Norwalk Zoning regulations to further expand affordable and moderate income housing opportunities, and to ensure that regulations are adequately addressing resident financial needs. In particular, the zoning updates should target expanding the supply of rental housing of all types that is affordable to households making between 41% SMI and 85% SMI (or between 35K and 75K a year) and as well as facilitating a greater proportion of two-bedroom and family sized units.	High Priority	1. Consider expanding inclusionary zoning provisions to further incentivize the development of affordable and moderate income housing units—including two-bedroom and family sized units which are in high-demand—as well as increasing the percentage of affordable housing within a particular development. Incentives include increased density bonuses, increased maximum height, and financial incentives (e.g., fee waivers and tax abatements). In the short term, capital funding could be set aside for analyzing and identifying specific per unit financial incentives to create a sliding scale for implementation.	Medium-Term	Norwalk Planning & Zoning Commission	Outreach to the development community and financial modeling revealed that requiring additional inclusionary zoning units could negatively affect housing production due to financial constraints. Incentives, such as density bonuses and tax abatements could mitigate those financial constraints and may be preferable to increasing the required set aside.
			2. Financial analysis revealed that the current 10% set aside is appropriate for the current economic climate of higher interest rates and construction costs. The City should periodically review its inclusionary zoning requirements (Section 6.12, Workforce Housing) to assess whether the percentage of units in new developments required to be designated as affordable could be increased as economic conditions evolve. Also consider adding incentives, such as density bonuses and tax abatements to facilitate construction of affordable housing units above the minimum requirement. This requirement should be monitored to ensure that the increase is not inadvertently adversely affecting housing production in the City. Further monitoring and analysis should be identified as a funding need in the City’s budget.	Short-Term	Norwalk Planning & Zoning Commission	Financial modeling revealed that requiring addition al inclusionary zoning units could negatively affect housing production due to financial constraints associated with current interest rates, land values, and construction costs. Multiple sources within the development community (market rate developers as well as affordable housing developers) recommended that any future implementation of a higher set aside be rolled out over a minimum of 5 years to mitigate the effect on land values and the potential stalling of projects that are in the predevelopment phases.
			3. Consider amending Section 6.12 to incentivize through density bonuses or tax abatements housing from 85%-80% State Median Income (SMI). This population is cost burdened but just above the threshold to be eligible for existing affordable housing.	Short-Term	Norwalk Planning & Zoning Commission; Norwalk Corporation Counsel	Prior to implementation, additional review to understand all potential impacts and hurdles of further changes.
			4. To the extent permitted by State statute, consider amending Section 6.12 to allow for existing tenants to increase their annual income at levels consistent with inflation and not lose eligibility until they reach a set cutoff point.	Short Term	Norwalk Planning & Zoning Commission; Norwalk Corporation Counsel	Any proposed language shall be reviewed to be in compliance with State statute.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
		5. Clarify in the definition of “Workforce Housing Unit” that required fees (e.g., amenity fees, parking fees) should be included in the maximum housing payment calculation or waived for residents of deed restricted affordable and moderate income housing units. Consider updating the term “Workforce Housing Unit” to “Inclusionary Housing Unit.”	Short-Term	Norwalk Planning & Zoning Commission	Proposed changes must consider impacts to construction of new units.
		6. Streamline development approvals process for new moderate income and affordable housing developments. Streamlining could include administrative only reviews, and reduced building department fees.	Short-Term	Norwalk Planning & Zoning Commission	Prior to implementation ensure adequate resources (staff & budgetary) are in place
	B. Expand the supply of all housing types to address the substantial number of renters and homeowners of all income levels that are financially burdened by the high cost of housing in Norwalk.	1. Consider lowering large lot size requirements to allow for more land for housing, and the increase the supply.	Medium-Term	Norwalk Planning & Zoning Commission	The city experienced public opposition to similar proposals during the recent zoning regulation rewrite. Future implementation would require public engagement to address community concerns prior to adoption.
		2. Consider reducing the minimum lot sizes and corresponding dimensional requirements for the “Community District” zones (see Article 4, “Building and Lot/ Building Design Standards”) to allow for increased density.	Medium-Term	Norwalk Planning & Zoning Commission	
		3. Consider allowing as-of-right conversions from single-family to two-family dwellings in additional areas within the City.	Medium-Term	Norwalk Planning & Zoning Commission	
		4. Consider allowing duplexes, townhouses, small multi-family buildings, mid-rises, and mixed-use buildings in the CD-2 district.	Long-Term	Norwalk Planning & Zoning Commission	These areas recently allowed upzoning to 2-family dwellings on all lots within the CD-2 zone. The city experienced recent push back during the zoning regulation rewrite on these particular incentives. City should evaluate this slowly and carefully and gauge public input before implementing.
		5. Allow alternative housing types (e.g., single-room occupancy buildings) in mixed-use commercial areas, such as locations where hotels are currently permitted.	Medium-Term	Norwalk Planning & Zoning Commission	Where these units are located requires careful analysis and consideration to ensure neighborhood integrity is maintained.
	C. Further reduce minimum parking requirements for all housing types to reduce the cost of construction and minimize barriers to housing development.	1. Target parking reductions in areas that are transit rich areas and locations where on-street or municipal parking is readily available.	Medium -Term	Norwalk Planning & Zoning Commission	Significant reductions were afforded in the recent zoning rewrite. Monitoring impacts and making adjustments over time is warranted.
		2. Amend Article 4, “Building and Lot/ Building Design Standards” to reduce parking requirements from 1.3 per dwelling unit for large multifamily buildings to 1 in areas in close proximity to mass transit.	Medium -Term	Norwalk Planning & Zoning Commission	Monitoring impacts and making adjustments over time is warranted.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
	D. Further reduce regulations inhibiting the construction of Accessory Dwelling Units (ADUs).	3. Amend Article 4, “Building and Lot/ Building Design Standards”, to further reduce the parking requirements for developments withing ¼ mile and 1/8 mile from transit centers from 10% less to 15% less.	Medium -Term	Norwalk Planning & Zoning Commission	Monitoring impacts and making adjustments over time is warranted.
		1. Amend Article 4, “Building and Lot/ Building Design Standards”, to reduce the minimum setbacks from the Accessory buildings from 20 ft+ the principal building setback to 10 ft+ the principal building setback.	Short-Term	Norwalk Planning & Zoning Commission	Commission should evaluate whether this is appropriate and whether there will be any impacts.
		2. Develop “pre-approved” detached ADU plans to minimize design costs and facilitate fast-tracked approvals for new accessory dwelling units.	Medium-Term	Building & Code Enforcement Department	Determine whether there are staffing or budgetary hurdles to overcome.
		3. Conduct a GIS mapping analysis to identify properties that have the potential to support an ADU. Initiate a public outreach campaign to build awareness and encourage new ADUs.	Medium-Term	Norwalk Planning & Zoning and Community Services Department	Determine whether there are staffing or budgetary hurdles to overcome.
	E. Improve Administration and Implementation of Affordable Housing.	1. Implement a tracking system for annual housing starts and demolitions to chart annual shifts in housing supply. The monitoring of affordable housing program impacts can be made publicly available online.	Short-Term	Building & Code Enforcement Department	Determine whether there are staffing or budgetary hurdles to overcome.
		2. Publish a table on the City’s website that shows affordable housing eligibility based on household income at the time of application.	Short-Term	Norwalk Housing Authority	Determine whether there are staffing or budgetary hurdles to overcome.
		3. Publish an annual housing report to track city spending on affordable housing development and preservation.	Short-Term	Norwalk Housing Authority	Determine whether there are staffing or budgetary hurdles to overcome.
		4. Streamline the application process for prospective workforce housing residents. Create a standardized application form for all workforce housing in Norwalk, and unified waitlist procedures that include automated notifications. Require all buildings with workforce housing units to advertise such units on their website and include information on how to apply and current waitlist information. Require all buildings with workforce housing units to provide Norwalk with full contact information to publish on the Affordable Housing website.	Medium-Term	Norwalk Housing Authority	Determine whether there are legal or statutory hurdles to overcome.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
	F. Streamline development review and approval process.	1. Implement a publicly accessible checklist of all application materials, as well as a flow chart which details the timeline and review process for the applicant.	Medium-Term	Norwalk Planning & Zoning Commission	Determine whether there are staffing or budgetary hurdles to overcome.
	G. Facilitate connecting residents with affordable and moderate income housing opportunities.	1. Coordinate department resources to support residents seeking affordable units and moderate income housing units.	Short-Term	Norwalk Planning & Zoning and Community Services Department	Determine whether there are staffing or budgetary hurdles to overcome.
Public Private Partnerships					
Norwalk has a critical need to provide more affordable housing, social services, and economic pathways for its very low-income households (e.g., under 30%, 50%, and 60% SMI). The market alone will not address this gap and public investment is required.	A. Facilitate the construction of new affordable housing units targeted below 80% SMI to address the gap in production of deeply affordable units through the use of underutilized City-owned land or City affordable housing funds.	1. Identify underutilized municipal land that can be used for affordable housing development, including properties with excess surface parking.	Short-term	Planning & Zoning Department	Careful consideration regarding all needs and impacts must be considered prior to advancing requests for proposals or development plans for specific properties.
		2. Identify privately owned properties with excess vacant land or excess surface parking that could be used for affordable housing development as part of a public private partnership that includes the use of the City's Affordable Housing Account funds. This could include faith-based institutions and buildings in the CD-3 and CD-4 districts that could be expanded vertically to include new housing units.	Medium-term	Planning & Zoning Department	Careful consideration regarding all needs and impacts must be considered prior to advancing requests for proposals or development plans for specific properties.
		High Priority3. Conduct a competitive developer Request for Proposal (RFP) process to solicit proposals for the construction of new affordable units on City-owned land. RFP can include specific development criteria to meet the City's identified housing needs and community goals (e.g., minimum number/type of units, community benefits, parking). Ultimate development could include a mix of public land, public funds (e.g., grants), and private capital.	Medium to Long-Term	Norwalk Redevelopment Agency & Planning & Zoning Department	Pending analysis of prior recommendations.
	B. Work with community partners to facilitate the development and preservation of	High Priority1. Develop a program to preserve/update "naturally affordable units" (e.g., market rate units in older/less amenitized buildings). Program could offer micro-grants/capital funds for building improvements in exchange for deed restricted affordable units.	Medium-Term	Norwalk Economic and Community Development Office	Ensure there is no overlap with existing City programs. Also dependent on City funds and staff availability.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
	affordable and moderate income housing.	2. Facilitate connecting local development partners with direct grants/subsidies from the State Department of Housing and Connecticut Housing Finance Authority.	Medium-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints.
		3. Facilitate collaboration between nonprofit housing organizations, private housing developers, and agencies to share resources, technical skills, and knowledge regarding availability of land, capital, and funding resources for affordable housing.	Medium-Term	Norwalk Redevelopment Agency	Dependent on staff availability and budgetary constraints.
	C. Expand both housing and economic development opportunities for low-income residents.	1. Use Community Development Block Grant (CDBG) funding to support local not-for-profit organizations that address housing insecurity and provide training for housing providers, workforce development, and vocational training.	Short-Term	Norwalk Redevelopment Agency	Dependent on staff availability and budgetary constraints.
		2. Support community partners who provide training for housing providers, workforce development and vocational training through the Neighborhood Assistance Act (NAA) Tax Credit Program.	Short-Term	Norwalk Redevelopment Agency	Dependent on staff availability and budgetary constraints.
		3. Provide homeownership counseling and education programs to prepare potential homeowners for the responsibilities of home ownership, including budgeting, maintenance, and financial planning. This could include increasing awareness of existing programs offered by community partners (e.g., the Housing Development Fund, https://hdfconnects.org/first-time-home-buyer/)	Medium-Term	Norwalk Housing Authority	Need to ensure that the Norwalk Housing Authority has capacity.
		4. Provide real estate training and technical assistance for local private market and community-based housing providers in alignment with the Norwalk Redevelopment Agency’s Strategic Plan	Short-Term	Norwalk Redevelopment Agency	Dependent on staff availability and budgetary constraints.
	Tax and Financing Innovations				
Norwalk recognizes that financial incentives such as tax abatements and grants are needed to bridge the market gap and facilitate	A. Facilitate capital improvements on existing deed restricted affordable and "naturally affordable units" (e.g., market rate	1. Participate in the Neighborhood Assistance Act (NAA) Tax Credit Program.	Short-Term	Norwalk Redevelopment Agency	None, pending further analysis of the program and its impacts.
		2. Leverage Community Development Block Grant (CDBG) funds.	Short/Medium-Term	Norwalk Economic and Community Development Office	Need to assess how this fits into existing programming and budgetary framework.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
the preservation and construction of quality affordable and moderate income housing.	units in older/less amenitized buildings).	3. Develop a local micro-grant program to provide capital assistance to smaller developers and landlords to facilitate building improvements in exchange for deed restricted affordable units.	Medium-Term	Norwalk Economic and Community Development Office	Sources of funding need to be considered, including budgetary impacts.
		4. Develop a local micro-grant program to provide capital assistance to homeowners to facilitate construction of deed restricted affordable ADUs.	Medium-Term	Norwalk Economic and Community Development Office	Sources of funding need to be considered, including budgetary impacts.
		5. Provide education and application support services to landlords looking to make capital improvements. Facilitate awareness of existing CT DOH programs such as Competitive Housing Assistance for Multifamily Properties (CHAMP) and the CT Housing Development Fund (HDF) LEAP (Landlord Entrepreneurship Affordability Program).	Medium-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints.
	B. Support the development of affordable homeownership units and pathways for residents to become homeowners.	1. Facilitate participation in the CT DOH Land Bank & Land Trust Program to acquire real property for the purpose of providing existing and future needs of very low-, low-, and moderate income families.	Long-Term	Norwalk Redevelopment Agency	None. Provided funding and staffing impacts are fully analyzed and understood.
		2. Establish a prioritization list for funding streams, made accessible online. Maintain and update list on an annual basis.	Short-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints.
		3. Collaborate with the Connecticut Office of Brownfield Remediation and Development (OBRD) for financing and technical assistance to redevelop Norwalk's 33 Brownfields land for future affordable and moderate income developments, for properties where residential development is permitted and appropriate. ¹ Work with Connecticut Brownfield Land Bank for financial and technical assistance for the acquisition of these sites. ²	Medium/Long-Term	Norwalk Housing Authority	Consideration should also be given for other needs and uses within the district.

¹ <https://portal.ct.gov/deep/remediation--site-clean-up/brownfields/brownfields-site-inventory>. Accessed 9/11/2024.

² <https://ctblb.org/>. Accessed 9/11/2024.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
		4. Facilitate the establishment of a Community Land Trust (CLT) or Land Bank as a mechanism to acquire land for the purpose of creating permanently affordable home ownership opportunities. ¹	Medium-Term	Norwalk Economic and Community Development	Need to ensure that there are no budgetary impacts on change in policy.
		5. Educate community members on the availability of state and local resources to support the development of affordable housing.	Short-Term	Norwalk Housing Authority	Dependent on staff availability and budgetary constraints.
		6. Collaborate with a sponsoring organization or private lenders to facilitate Shared Appreciation Mortgages (SAMS).	Medium-Term	Norwalk Economic and Community Development Office	Need to ensure that there are no budgetary impacts on change in policy.
		7. Create new low-interest or forgivable loan program that provides financial assistance for: affordable housing developers, the rehabilitation of naturally affordable units, first time homeowners who make less than 85% of SMI.	Medium-Term	Norwalk Housing Authority	Need to ensure that there are no budgetary impacts on change in policy.
		8. Provide direct subsidies or down payment assistance to help buyers purchase homes through the implementation of Subsidized Purchase Programs.	Medium-Term	Norwalk Economic and Community Development Office	Need to ensure that there are no budgetary impacts on change in policy.
		9. Implement a Graduated Homeownership Program, where eligible renters can gradually purchase their homes over time, with portions of their rent contributing to their equity in the home.	Medium-Term	Norwalk Housing Authority	Evaluation and consideration of fiscal and budgetary impacts needs to be considered before enactment.
		10. Facilitate lease-purchase agreements that would enable renters to lease a property with an option to buy after a certain period. This type of agreement would typically be between a private or non-profit housing developer and a renter.	Medium-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints as well as legal review regarding any city liability.
	C. Provide local tax incentives to facilitate affordable housing.	<div>High Priority</div> 1. Establish an affordable housing property tax incentive policy for qualified affordable housing units (see CGS Section 12-65b) to incentivize the creation of new deed restricted affordable units, and the improvement/preservation of naturally occurring affordable housing units.	Medium-Term	Common Council / Board of Estimate and Taxation	Evaluation and consideration of fiscal impacts needs to be considered before enactment.

¹ Community Land Trusts are typically operated by not-for-profit entities whereas Land Banks are typically operated by municipal entities.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
Federal and State Advocacy					
Norwalk recognizes that the housing crisis is a complex regional problem that requires partnerships with state and federal agencies to address its many fronts. Norwalk is committed to advancing equity in housing, and to addressing enduring racial disparities in income levels and housing access.	A. Expand affordable housing opportunities by lobbying Norwalk’s state and federal delegations to address tax and financing policies that act as a barrier to certain unit types (e.g., multi-family ownership buildings including condominiums and limited equity coops) and to expand existing affordable housing programs.	1. Advocate for continued and expanded funding of State Department of Housing and Connecticut Housing Finance Authority programs.	Medium-Term	City of Norwalk Mayor’s Office	Dependent on staff availability and budgetary constraints.
		2. Promote Connecticut Housing Finance Authority and United States Department of Agriculture First-Time Homebuyer Mortgage Programs. Lobby for expansion/continuation of these programs to ensure that they remain applicable to buyers in high-income areas such as Fairfield County, and capture all unit types (e.g., condominiums, co-op apartments) and not just single-family dwellings.	Medium-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints.
		3. Lobby for the expansion of the CT DOH Homeownership Initiative (PA 22-118).	Medium-Term	City of Norwalk Mayor’s Office	Dependent on staff availability and budgetary constraints. Confirmation with legal and legislative team also necessary.
		4. Lobby for the federal Affordable Housing Credit Improvement Act (AHCIA) which would strengthen the Low-Income Housing Tax Credit (IRC §42) program that supports the development of affordable housing.	Short-Term	City of Norwalk Mayor’s Office	Dependent on staff availability and budgetary constraints. Confirmation with legal and legislative team also necessary.
		5. Lobby for Senate Bill 143, a bill that incorporates eviction reform policies protecting rental tenants from evictions at the end of their lease agreements.	Medium-Term	City of Norwalk Mayor’s Office	Dependent on staff availability and budgetary constraints. Confirmation with legal and legislative team also necessary.
		6. Housing affordability is a regional crisis. Work with WestCOG to further fair housing goals and the creation of affordable housing in adjacent municipalities. Support the recommendations in the WestCOG Affordable Housing Finance Study to create an Affordable Housing Resource Center, an Affordable Housing Trust Fund, and a Community Land trust.	Medium-Term	City of Norwalk Mayor’s Office / Norwalk Housing Authority	Dependent on staff availability and budgetary constraints.
		<div>High Priority</div> 7. Advocate for more governmental funding for public and affordable housing.	Long-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints.

Principle	Goal	Action	Timeframe	Responsible Party	Challenges
		8. Advocate for Act Increasing the Minimum Fair Wage to increase the statewide minimum wage. ¹	Long-Term	Norwalk Economic and Community Development Office	Dependent on staff availability and budgetary constraints. Confirmation with legislative team also necessary.
Notes: CDBG = Community Development Block Grant CT DOH = CT Department of Housing CGS = Connecticut General Statutes SMI = State Median Income WestCOG = Western Connecticut Council of Governments					

¹ <https://www.cga.ct.gov/2019/act/pa/pdf/2019PA-00004-R00HB-05004-PA.pdf>. Accessed 9/11/2024.