

PUTNAM PARK PLACE HOUSING AFFORDABILITY PLAN

INTRODUCTION

March 2nd, 2026

Rose Marino, homeowner, developer, and owner of single-member LLC (Putnam Park Place, LLC), is submitting this Housing Affordability Plan along with its application to the Bethel Planning & Zoning Commission for approval of a 3 unit multi-family affordable housing development, Putnam Park Place, LLC, (hereafter, "Putnam Park Place") on property located at 49 Putnam Park Road, Bethel, Connecticut. The Application consists of creating three (3) new residential Units in an existing accessory building. Each unit will contain 1-bedroom. This Affordability Plan shall be binding upon the current owner, and its successors and assigns for the Affordability Period described herein.

Under this plan, at least (30%) of the residential rental units – or one (1) unit will be designated as a Housing Opportunity Unit that will meet the criteria for "affordable housing" as defined in Connecticut General Statutes ("C.G.S.") § 8-30g ("Housing Opportunity Units"). C.G.S. § 8-30g(a)(g) requires that fifteen percent (15%) of the Housing Opportunity Units be affordable for 40 years to families earning eighty percent (80%) or less of the area or State median income, whichever is less, and that fifteen percent (15%) be affordable to families earning sixty percent (60%) or less of the area or State median income, whichever is less.

This Affordability Plan, which is proposed as a condition of the above listed approval by the Bethel Zoning Department for Putnam Park Place, describes how the regulations regarding affordability will be administered.

AFFORDABILITY PLAN

1. Units Designated as Housing Opportunity Units.

At least thirty (30%) percent of the residential rental units, or one (1) unit, will be designated as a Housing Opportunity Unit pursuant to C.G.S. § 8-30g. Of the three (3) total one-bedroom units, one (1) unit will be rented to persons or families whose income is less than sixty (60%) percent of the median income for the area as defined by Connecticut General Statutes Section 8-30g(a)(7) and the other two (2) units will be market rate units. The specific unit designated as affordable housing (49 Putnam Park Rd. Unit 3) is shown on Schedule A attached hereto.

2. Forty (40) Year Deed Restriction Period.

The Housing Opportunity Unit shall be designated as an affordable unit for at least forty (40) years after the initial occupation. The 40 years shall be calculated beginning on the date that the certificate of occupancy is issued for the Housing Opportunity Unit. See Schedule B for the suggested deed restriction, which shall be recorded on the land records and shall be binding upon any subsequent purchaser or owner of the property and any mortgagee or lien holder with an interest in, to, or against the property.

3. Pro-Rata Construction and Dispersion.

The Housing Opportunity Unit shall be built, receive the Certificate of Occupancy and be offered for lease at the same time as the market rate units.

4. Nature of Construction of Housing Opportunity Units and Market Rate Units

The Housing Opportunity Unit shall be constructed in substantial conformance with the site plans and floor plans approved in the zoning permits for the building, and may be modified based on the requirements of the Bethel Building Official or other Town staff involved in signing off on administrative permits or approvals.

5. Entity Responsible for Administration and Compliance.

This Affordability Plan will be administered by Putnam Park Place, represented by Rose Marino, developer and owner. Upon any changes to the principal point of contact or the Administrator, the owner will provide notice of such change, prior to it taking effect, to the Town of Bethel and the current residents.

6. Notice of Initial Rental of Housing Opportunity Units.

The Administrator shall provide notice of the availability for rental of the Housing Opportunity Unit. At a minimum, such notice shall be provided by advertising at least two times in a

newspaper of general circulation in the town of Bethel. The Administrator shall also provide such notices to the Bethel Planning and Zoning Department and to the Town Clerk of the Town of Bethel. These notices shall include a description of the available Housing Opportunity Unit, the eligibility criteria for potential residents, the maximum rental price, as calculated in section 11 below, and the availability of application forms and additional information.

All such notices shall comply with the federal Fair Housing Act, 42 U.S.C. §§ 3601 et seq. and the Connecticut Fair Housing Act, C.G.S. §§ 46a-64b et seq. (together, the "Fair Housing Acts").

7. Resident Eligibility.

Eligibility of applicants to lease a Housing Opportunity Unit in the Community shall be determined by the Administrator in accordance with this Plan and C.G.S. § 8-30g, as amended.

If an existing resident is determined to be ineligible in the future, the applicant will take all reasonable measures to either find the tenant another unit in the building that is not restricted or transfer the affordability restriction to another vacant unit. Provided, however, that the owner and/or the Administrator will not take any action that is not permitted pursuant to C.G.S. § 8-30g, as amended, or would result in the property being out of compliance. If there are no vacant units at the time the applicant becomes over-income, then the owner and/or the Administration shall comply with the requirements of C.G.S. § 8-30g, as amended.

8. Affirmative Fair Housing Marketing Plan.

The rental of both the Housing Opportunity Unit and market-rate units at 49 Putnam Park Rd. shall be publicized, using State regulations for affirmative fair housing marketing programs as guidelines. The purpose of such efforts shall be to apprise residents of municipalities of relatively high concentrations of minority populations of the availability of such units. The Administrator shall have responsibility for compliance with this section. Notices of initial availability of units shall be provided, at a minimum, by advertising at least two times in a newspaper of general circulation in Bethel, CT. The Administrator shall also provide such notices to the Commission and the local or regional housing authority. Such notices shall include a description of the available Housing Opportunity Unit, the eligibility criteria for tenants, and the availability of application forms and additional information. Using the above-referenced State regulations as guidelines, information about available Housing Opportunity Units and market-rate units shall include:

A. Analyzing census, Connecticut Department of Economic and Community Development town profiles, and other data to identify racial and ethnic groups least likely to apply based on representation in Bethel's population, including Asian Pacific, Black, Hispanic, and Native American populations.

B. Announcements/advertisements in publications and other media that will reach minority populations, including newspapers, and radio stations serving Bethel and other towns in the metropolitan statistical area and regional planning area, and advertisements or flyers likely to be viewed on public transportation or public highway areas.

C. Announcements to social service agencies and other community contacts serving low-income minority families (such as churches, civil rights organizations, the housing authority, and other housing authorities in towns represented in Bethel's metropolitan statistical area and regional planning agency, legal services organizations, etc.).

D. Assistance to minority applicants in processing applications.

E. Marketing efforts in geographic area of high minority concentrations within the housing market area and metropolitan statistical area.

F. Beginning affirmative marketing efforts prior to general marketing of units, and repeating again during initial marketing and at 50 percent completion and thereafter at reasonable period intervals with respect to re-rentals.

All notices shall comply with the State and Federal Fair Housing Acts.

9. Application Process.

A person seeking to rent the Housing Opportunity Unit ("Applicant") must complete an application to demonstrate eligibility. The application form and process shall comply with the Fair Housing Acts.

A. Application Form.

The application form shall be provided by the Administrator and shall include an income certification form. In general, "income" for purposes of determining an Applicant's qualification shall include the Applicant family's total anticipated income from all sources for the twelve (12) month period following the date the application is submitted ("Application Date"). If the Applicant's financial disclosures indicate that the Applicant may experience a significant change in the Applicant's future income during the twelve (12) month period, the Administrator shall not consider this change unless there is a reasonable assurance that the change will in fact occur. In determining what is and is not to be included in the definition of annual family income, the Administrator shall use the criteria set forth by HUD and listed on Schedule C, attached.

B. Applicant Interview.

The Administrator shall interview an Applicant upon submission of a completed application. Specifically, the Administrator shall, during the interview, undertake the following:

1. Review with the Applicant all the information provided on the application.
2. Explain to the Applicant the requirements for eligibility, verification procedures, and the penalties for supplying false information.
3. Verify that all sources of family income and family assets have been listed in the application. Make clear that the term "family" includes all individuals who are to occupy the home, and that no relationship by blood or marriage is required.
4. Request the Applicant to sign the necessary release forms to be used in verifying income. Inform the Applicant of what verification and documentation must be provided before the application is deemed complete.
5. Inform the Applicant that a decision as to eligibility cannot be made until all items on the application have been verified.

C. Verification of Applicant's Income.

Where it is evident from the income certification form provided by the Applicant that the Applicant is not eligible, additional verification procedures shall not be necessary. However, if the Applicant appears to be eligible, the Administrator shall require verification of the Applicant's reported income. If applicable, the Applicant shall provide the documentation listed on Schedule D, attached hereto, to the Administrator. This list is not exclusive, and the Administrator may

require any other verification or documentation as the Administrator deems necessary. Federal regulations are subject to change, and it is the intent of this Affordability Plan to follow HUD regulations with respect to income certification as such regulations may be amended from time to time.

10. Prioritization of Applicants for Initial Rental.

In the event that the number of qualified Applicants exceeds the number of Housing Opportunity Units, then the Administrator shall compile a waiting list, from which Applicants will be selected on a first-come, first-served basis. For purposes of this section, an application shall be considered received when a completed and signed application form is submitted with the applicable application fee.

11. Maximum Rental Price.

Calculation of the maximum rental price ("Maximum Rental Price") for a Housing Opportunity Unit, so as to satisfy C.G.S. § 8-30g, shall utilize the lesser of the area median income for the Town of Bethel or the statewide median income as published by HUD as in effect on the day a lease is signed by the lessee of the Housing Opportunity Unit ("Resident"). Such income shall then be adjusted for household size assuming occupancy by 1.5 persons per bedroom and using the adjustment formula adopted by State regulations. The Maximum Rental Price shall be calculated as follows:

1BR 60% RENT CALCULATIONS

1. Determine lower of relevant year (2025) area median income for "FMR AREA" (\$148,900) or statewide (2025) median income (\$124,600), adjusted for family size (family of 4) as published by HUD		\$124,600.00
2. Determine adjusted income for household of 1.5 persons by calculating 75% of Step 1	75%	\$93,450.00
3. Calculate 60% of Step 2	60%	\$56,070.00
4. Calculate 30% of Step 3, for maximum amount of a family's income that may be used for housing expenses	30%	\$16,821.00
5. Divide Step 4 by 12 to determine maximum monthly housing expense	÷ 12	\$1,402.00
6. Compare HUD 2026 Fair Market Rents for "FMR Area" 1BR (\$1,880) times 100%	100%	\$1,880.00
7. Use lesser of calculated maximum monthly expense (Step 5) vs. HUD fair market rent (Step 6)		\$1,402.00
8. Determine by reasonable estimate monthly expenses for heat and utility costs, excluding telephone and cable television but including any fee required for all tenants (tenant responsible for such expenses)	-	\$115.00
9. Subtract reasonable monthly expenses (Step 8) from maximum housing expense (Step 7) to determine maximum amount available for rent		\$1,287.00

12. Principal Residence.

Housing Opportunity Units shall be occupied only as a Resident's principal residence, notwithstanding any zoning, subdivision, or other regulation to the contrary, subleasing of Housing Opportunity Units shall be prohibited.

13. Requirement to Maintain Condition.

All Residents are required to maintain their units. The Resident shall not destroy, damage or impair the unit, allow the unit to deteriorate, or commit waste on the unit. When a Housing Opportunity Unit is offered again for rental, the Administrator shall cause the unit to be inspected.

14. Change of Income or Qualifying Status of Resident.

If a resident's Family Income changes to exceed the maximum permitted, the resident must provide notice to the Administrator within seven days of the disqualification. The tenant will have ninety (90) days to vacate the unit. If the Owner designates a replacement Housing Opportunity Unit within that time period, the tenant can sign a new lease at market rate instead of vacating the unit.

15. Enforcement.

A violation of this Affordability Plan shall not result in a forfeiture of title, but the Commission shall otherwise retain all enforcement powers granted by the General Statutes, including § 8-12, which powers include, but are not limited to, the authority, at any reasonable time, to inspect the property and to examine the books and records of the Administrator to determine compliance of Housing Opportunity Units with this Affordability Plan and applicable state statutes and regulations.

16. Change In Ownership.

If at any time there is a change of ownership of the Property, the existing owner shall provide written notice of the sale or transfer to the Town Planner within 30 days of executing Purchase and Sale Agreement, which notice shall include the name of the person(s) or company that is purchasing the property along with a contact at said company.

17. Reporting.

The owner shall submit an annual report or certification to the Town of Bethel Director of Planning to confirm that the property remains in conformance with the requirements of CGS 8-30g as it pertains to renting units to qualifying tenants.

SCHEDULE B DEED RESTRICTION FOR 8-30g UNITS

"This development is a set aside development as defined in section 8-30g of the Connecticut General Statutes and in accordance with the applicable regulations for state agencies that were in effect on the date of the original application for initial local approval _____(insert appropriate date), containing 1 affordable housing dwelling unit, and is therefore subject to limitations on the maximum annual income of the household that may rent the designated affordable housing dwelling unit, and on the maximum rental that may be charged for such affordable housing dwelling unit. These limitations shall be strictly enforced, and may be enforced by the zoning enforcement authority of the Town of Bethel against the record owner of the development or the person identified in the affordability plan as responsible for the administration of these limitations.

For the duration of this covenant or restriction, no less than fifteen percent (15%) of the dwelling units in this development shall be rented to persons and families whose annual income is less than or equal to eighty percent (80%) of the median income as defined in subsection 8-30g-1(10) of the Regulations of Connecticut State Agencies, and such units may be rented only at a rental equal to or less than the rental determined using the formula for maximum monthly rental amount stated in section 8-30g-8(d) of the Regulations of Connecticut State Agencies. In addition, no less than fifteen percent (15%) of the dwelling units shall be rented to persons and families whose annual income is less than or equal to 60 percent (60%) of the median income as defined in subsection 8-30g-1(10) of the Regulations of Connecticut State Agencies, and such units may be rented only at a rental equal to or less than the rental determined using the formula for maximum monthly rental amount stated in section 8-30g-8(e) of the Regulations of Connecticut State Agencies."

SCHEDULE C

DEFINITIONS AND ELEMENTS OF ANNUAL FAMILY INCOME

1. Annual income shall be calculated with reference to 24 C.F.R. §609, and includes, but is not limited to, the following:
 - A. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips, bonuses and other compensation for personal services.
 - B. The net income from operations of a business or profession, before any capital expenditures but including any allowance for depreciation expense.
 - C. Interest, dividends and other net income of any kind from real or personal property.
 - D. The amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, or other similar types of periodic payments.
 - E. Payments in lieu of earnings, such as unemployment and disability compensation, workers' compensation and severance pay.
 - F. Welfare assistance. If the welfare assistance payments include an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance to be included as income consists of the following:
 - (i) The amount of the allowance exclusive of the amounts designated for shelter or utilities; plus
 - (ii) The maximum amount that the welfare assistance agency could, in fact, allow the family for shelter and utilities;
 - G. Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing with the Applicant (e.g., periodic gifts from family members, churches or other sponsored group, even if the gifts are designated as rental or other assistance).
 - H. All regular pay, special pay and allowances of a member of the armed forces.
 - I. Any assets not earning a verifiable income shall have an imputed interest income using a current average annual savings interest rate.

2. Excluded from the definition of family income are the following:
 - A. Income from employment of children under the age of 18;
 - B. Payments received for the care of foster children;
 - C. Lump-sum additions to family assets, such as inheritances, insurance payments, capital gains and settlement for personal or property losses;
 - D. Amounts received that are specifically for, or in reimbursement of, the cost of medical expense for any family member;
 - E. Amounts of educational scholarships paid directly to the student or to the educational institution and amounts paid by the government to a veteran in connection with education costs;
 - F. Amounts received under training programs funded by HUD;

- G. Food stamps; and
- H. Temporary, nonrecurring or sporadic income (including gifts that are not regular or periodic).

3. Net family assets for purposes of imputing annual income include the following:

- A. Cash held in savings and checking accounts, safety deposit boxes, etc.;
- B. The current market value of a trust for which any household member has an interest;
- C. The current market value, less any outstanding loan balances of any rental property or other capital investment;
- D. The current market value of all stocks, treasury bills, certificates of deposit and money market funds;
- E. The current value of any individual retirement, 401K or Keogh account;
- F. The cash value of a retirement or pension fund with the family member can withdraw without terminating employment or retiring;
- G. Any lump-sum receipts not otherwise included in income (i.e., inheritances, capital gains, one-time lottery winnings and settlement on insurance claims);
- H. The current market value of any personal property held for investment (i.e., gems, jewelry, coin collections); and
- I. Assets disposed of within two (2) years before the Application Date, but only to the extent consideration received was less than the fair market value of the asset at the time it was sold.

4. Net family assets do not include the following:

- A. Necessary personal property (clothing, furniture, cars, etc.);
- B. Vehicles equipped for handicapped individuals;
- C. Life insurance policies;
- D. Assets which are part of an active business, not including rental properties; and
- E. Assets that are not accessible to the Applicant and provide no income to the Applicant.

SCHEDULE D

DOCUMENTATION OF INCOME

The following documents shall be provided, where applicable, to the Administrator to determine income eligibility:

1. Employment Income. Verification forms must request the employer to specify the frequency of pay, the effective date of the last pay increase, and the probability and effective date of any increase during the next twelve (12) months. Acceptable forms of verification (of which at least one must be included in the Applicant file) include:
 - a. An employment verification form completed by the employer.
 - b. Check stubs or earning statement showing Applicant's gross pay per pay period and frequency of pay.
 - c. W-2 forms if the Applicant has had the same job at least two years and pay increases can be accurately projected.
 - d. Notarized statements, affidavits or income tax returns signed by the Applicant describing self-employment and amount of income, or income from tips and other gratuities.
2. Social Security, Pensions, Supplementary Security Income, Disability Income.
 - a. Benefit verification form completed by agency providing the benefits.
 - b. Award or benefit notification letters prepared and signed by the authorizing agency. (Since checks or bank deposit slips show only net amounts remaining after deducting SSI or Medicare, they may be used only when award letter cannot be obtained.)
 - c. If a local Social Security Administration (SSA) office refuses to provide written verification, the Administrator should meet with the SSA office supervisor. If the supervisor refuses to complete the verification forms in a timely manner, the Administrator may accept a check or automatic deposit slip as interim verification of Social Security or SSI benefits as long as any Medicare or state health insurance withholdings are included in the annual income.
3. Unemployment Compensation.
 - a. Verification form completed by the unemployment compensation agency.
 - b. Records from unemployment office stating payment dates and amounts.
4. Government Assistance.
 - a. All Government Assistance Programs. Agency's written statements as to type and amount of assistance Applicant is now receiving, and any changes in assistance expected during the next twelve (12) months.
 - b. Additional Information for "As-Paid" Programs: Agency's written schedule or statement that describes how the "as-paid" system works, the maximum amount the Applicant may receive for shelter and utilities and, if applicable, any factors used to ratably reduce the Applicant's grant.
5. Alimony or Child Support Payments.
 - a. Copy of a separation or settlement agreement or a divorce decree stating amount

and type of support and payment schedules.

- b. A letter from the person paying the support
- c. Copy of latest check. The date, amount, and number of the check must be documented.
- d. Applicant's notarized statement or affidavit of amount received or that support payments are not being received and the likelihood of support payments being received in the future.

6. Net Income from a Business. The following documents show income for the prior years. The Administrator must consult with Applicant and use the data to estimate income for the next twelve (12) months.

- a. IRS Tax Return, Form 1040, including any:
 - (i) Schedule C (Small Business);
 - (ii) Schedule E (Rental Property Income); or
 - (iii) Schedule F (Farm Income).
- b. An accountant's calculation of depreciation expense, computed using straight-line depreciation rules. (Required when accelerated depreciation was used on the tax return or financial statement.)
- c. Audited or unaudited financial statement(s) of the business.
- d. A copy of a recent loan application listing income derived from the business during the previous twelve (12) months.
- e. Applicant's notarized statement or affidavit as to net income realized from the business during previous years.

7. Recurring Gifts.

- a. Notarized statement or affidavit signed by the person providing the assistance. Must give the purpose, dates and value gifts.
- b. Applicant's notarized statement or affidavit that provides the information above.

8. Scholarships, Grants, and Veterans Administration Benefits for Education.

- a. Benefactor's written confirmation of amount of assistance, and educational institution's written confirmation of expected cost of the student's tuition, fees, books and equipment for the next (12) months. To the extent the amount of assistance received is less than or equal to actual educational costs. The assistance payments will be excluded from the Applicant's gross income. Any excess will be included in income
- b. Copies of latest benefits checks, if benefits are paid directly to student. Copies of canceled checks or receipts for tuition, fees, books, and equipment, if such income and expenses are not expected to change for the next twelve (12) months.
- c. Lease and receipts or bills for rent and utility costs paid by students living away from home.

9. Family Assets Currently Held. For non-liquid assets, collect enough information to determine the current cash value (i.e., the net amount the Applicant would receive if the asset were converted to cash)

- a. Verification forms, letters, or documents from a financial institution,

broker, etc.

- b. Passbooks, checking account statements, certificates of deposit, bonds, or financial statement completed by a financial institution or broker.
- c. Quotes from a stock broker or realty agent as to net amount Applicant would receive if Applicant securities or real estate.
- d. Real estate tax statement if tax authority uses approximate market value.
- e. Copies of closing documents showing the selling price, the distribution of the sales proceeds and the net amount to the borrower
- f. Appraisals of personal property held as an investment.
- g. Applicant's notarized statements or signed affidavits describing assets or verifying the amount of cash held at the Applicant's home or in safe deposit boxes.

10. Assets Disposed of for Less Than Fair Market Value ("FMV") During Town Years Preceding Application Date.

- a. Applicant's certification as to whether it has disposed of assets for less than FMV during the two (2) years preceding the Application Date.
- b. If the Applicant states that it did dispose of assets for less than FMV, then a written statement by the Applicant must include the following:
- c. Quotes from a stock broker or realty agent as to net amount Applicant would receive if Applicant liquidated securities or real estate.
- d. Real estate tax statements if tax authority uses approximate market value.
- e. Copies of closing document showing the selling price, the distribution of the sales proceeds and the net amount to the borrower.
- f. Appraisals of personal property held as an investment.
- g. Applicant's notarized statements or signed affidavits describing assets or verifying the amount of cash held at the Applicant's home or in safe deposit boxes.

11. Savings Account Interest and Dividends.

- a. Account statements, passbooks, certificates of deposit, etc., if they show enough information and are signed by the financial institution.
- b. Broker's quarterly statements showing value of stocks or bonds and the earning credited the Applicant.
- c. If an IRS Form 1099 is accepted from the financial institution for prior year earnings, the Administrator must adjust the information to project earning expected for the next twelve (12) months.

12. Rental Income from Property Owned by Applicant. The following, adjusted for changes expected during the next twelve (12) months, may be used:

- IRS Form 1020 with Schedule R (Rental Income).
- Copies of latest rent checks, leases, or utility bills.
- Documentation of Applicant's income and expenses in renting the property (tax statements, insurance premiums, receipts for reasonable maintenance and utilities, bank statements or amortization schedule showing monthly interest expense).
- Lessee's written statements identifying monthly payments due the Applicant and Applicant's affidavit as to net income realized.

13. Full-Time Student Status.

- a. Written verification from the registrar's office or appropriate school official.
- b. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the school.