

City of Trenton, New Jersey

2021 Annual Action Plan



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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Trenton receives funding annually from the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG) programs. The City of Trenton's FY 2021 Annual Action Plan (AAP) is mandated by federal law and regulations enforced by the U.S. Department of Housing and Urban Development (HUD) in order for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income (LMI) persons.

The primary federal funding resources in the FY 2021 Annual Action Plan include the following:

- **Community Development Block Grant (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program (HOME):** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- **Emergency Solutions Grant (ESG):** The Emergency Solutions Grant program became the Emergency Solutions Grant program under the Hearth Act of 2009. Recognizing the need to end homelessness, the Hearth Act places more emphasis on homeless prevention and rapid re-housing and less on shelters and transitional housing. ESG funding can be used to support traditional shelters, transitional housing that is grandfathered from 2010 funding, supportive services, rent and utility payments and security deposits to prevent homelessness or to rapidly re-house homeless individuals and families, street outreach, and management of a homeless management information system (HMIS).

Each year, the City of Trenton receives federal grants through the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) Programs. HUD requires the City to prepare

Annual Action Plan

an AAP to guide the investment of CDBG, HOME and ESG grant funds to address the City's housing, community development and economic development needs. This AAP covers the period from July 1, 2021 to June 30, 2022.

The City of Trenton anticipates the following federal resources in FY 2021:

- CDBG: \$2,802,586.03
- HOME: \$890,749
- ESG: \$252,442

2. Summarize the objectives and outcomes identified in the Plan

The 2020-2024 Consolidated Plan identified 6 goals, along with corresponding objectives and strategies, to address the City of Trenton's housing and community development needs. These goals are summarized as follows:

HOUSING

The City of Trenton will have desirable, stable, and inclusive neighborhoods, with a range of affordable and attractive housing options available to a diverse population.

- Support and improve partnerships and programs that reduce housing vacancies and strengthen neighborhoods.
- Expand affordable homeownership opportunities for all households by maintaining and expanding existing homeownership opportunities.
- Support City-wide emergency repair for owner-occupied income-qualified owners throughout the City.
- Diversify the City's housing stock, including the development of rental housing, to low anyone to make Trenton their home.

BLIGHT REMOVAL

The City of Trenton will eliminate blight and urban decay through housing rehabilitation and demolition.

IMPROVE PUBLIC INFRASTRUCTURE

- Develop a well-maintained and efficient network of roads and streets to facilitate the safe and efficient movement of vehicles.
- Repair and right-size key neighborhood infrastructure to increase resident safety, quality of life, and efficiency.
- Leverage green technology to reduce energy costs, improve air quality, and increase long-term sustainability.

IMPROVE PUBLIC FACILITIES

The City of Trenton will promote neighborhood revitalization and activities to enhance the quality of life for residents in low-to-moderate income area.

- Develop a network of comprehensive community facilities and services provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner.
- Provide parks, open space, and recreation infrastructure that both meets the needs of the community and is maintainable by the City and its community partners.

SUPPORT PUBLIC SERVICES

The City of Trenton will develop a network of comprehensive community facilities and services provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner to.

- Provide operating support for the Trenton Senior Centers
- Strengthen the educational attainment of youth.
- Promote literacy programs in youth and adults.
- Provide services to residents to improve skills and increase access to employment opportunities.

PREVENT HOMELESSNESS

Help to prevent and reduce homelessness in the City of Trenton.

- Increase housing stock/options that are affordable to extremely low-income households.
- Increase permanent supportive housing with appropriate and available services and supports.
- Link interim housing consumers to placement in permanent housing as soon as is practical for the client.

PROVIDE FACILITIES SERVICES FOR COVID RECOVERY

3. Evaluation of past performance

The last report submitted to HUD in the Comprehensive Annual Performance and Evaluation Report (CAPER) was for FY 2019 which ended June 30, 2020. Mid-way into FY 2020, the impact of the pandemic on the City's ability to provide services and continue construction was manifest. City Hall was closed, staff was quarantined, and ill and service providers and contractors were shut down. Further, the City had to budget, plan, and execute several covid-related programs include rental assistance from additional CDBG and ESG funding awarded to the City in the Summer of 2020.

During 2019, the City of Trenton's CDBG Program and HOME Investment Partnership Program offered comprehensive assistance to extremely low, very low and low-income persons and families with a variety of housing opportunities, social services, recreational opportunities and financial assistance. In addition, the City's Emergency Solutions Grant was utilized to assist the homeless or those at risk of homelessness. The City continued the First-Time Homebuyer program and ramped up production in the Housing Rehabilitation Program. Several public facility projects were completed, and others have received bids that are under review. Due to the global pandemic, construction in the City of Trenton was largely postponed.

In 2019, the City received a right to first refusal to purchase the Carver Center. CDBG funds were used to acquire the Carver Center, which will be used as a recreational facility for City of Trenton residents. The Homefront TLC capital improvement project construction was underway during 2019, however due to the global pandemic, construction was suspended. As of June 30, 2020 the building has passed all inspections.

During FY 2019 the City completed the following activities that were considered high priority

- First Time Homebuyer assistance: 3 persons
- Persons benefiting from Public services: 650 persons served
- Housing Units rehabilitated: 1 units completed
- Public Facilities rehabilitated (Persons served): 83,940 persons
- The Emergency Shelter Grant provided assistance to 4 agencies who assisted 1,613 people

Also underway during FY 2019 and FY2020:

- Construction began on four City owned Senior and Recreation public facility improvement projects.
- The Housing rehabilitation program began work on additional properties. The program is now back to being fully operational after a short suspension of construction due to the pandemic.
- Three economic development activities are underway to create new jobs for residents.
- The Emergency Solutions Grant funds was provided to homeless service agencies who used the funds to continue Emergency Shelter, Street Outreach, Homeless Prevention and Rapid Re-housing programs.
- The Patriot Village II project closed in 2020 and construction is underway. This project will create 11 new HOME housing units for households below 50% MFI.
- The global pandemic impacted the City's ability to accomplish all goals outlined in 2020's AAP. As a result of the changing needs in the community, the City had to establish a rental assistance program and a food distribution program.

4. Summary of Citizen Participation Process and consultation process

The City implemented a collaborative planning process, involving a broad range of public and private agencies, to identify key activities that will foster a stronger community for the use of federal entitlement funds available through the CDBG, HOME, and ESG Programs.

On February 3, 2021, the U.S. Department of Housing and Urban Development (HUD) granted a waiver allowing public hearings to be held virtually to allow for social distancing and limited public gatherings during a public health emergency. In agreement with 24 CFR 91.115(e) Trenton has adopted a Citizen Participation Plan describing the citizen participation requirements of its CDBG program. The Due to the on-going risk from infection, all public hearings for the 2021 program year were held virtually. The City revised its Citizen Participation Plan to allow for virtual public meetings during public health emergencies. The Citizen Participation Plan is on file at the City Department of Housing and Economic Development and available online at www.trentonnj.org/cdbg.

The City is continuing to follow local, state and federal recommendations to limit public gatherings during the COVID-19 public health emergency. As such, the City is utilizing the waiver during the development of its 2021 AAP and conducted public hearings in a virtual way in accordance with its Citizen Participation Plan.

On February 10, 2021, a public needs hearing on the FY 2021 Annual Action Plan was held to solicit input from social service agencies, housing providers, local municipalities, City agencies, and the general public. A more in-depth orientation on CDBG eligibility, national objective, and rules was provided.

The second notice was published March 22, 2021 and provided a public review period from March 22, 2021 to April 22, 2021. The document was also placed on the City of Trenton's web site:

www.trentonnj.org/fedpublicnotices.

A second public hearing will be held virtually on April 7, 2021.

The City Council approved submission of the Annual Action Plan at the April 29, 2021 meeting.

5. Summary of public comments

Public Needs Hearing

On February 10, 2021, a virtual public needs meeting was held. The meeting began at 6:00PM with a presentation by M&L of the overall purpose of the public meeting, a general review of the 5-year Consolidated Plan, eligible activities under CDBG, ESG and HOME, the National Objectives, Fiscal Year 2021 anticipated funding, request for proposal application process, timeline and next steps in the process, and final submission of the 2021 Annual Action Plan to HUD.

Throughout the presentation, the meeting was open for public comments on housing and community development needs by those in attendance. Public comment and question details are in the Appendix of this document. The following items/needs/issues were stated by the meeting attendees:

- Participants noted the need for additional affordable housing in the City of Trenton.
- There is a continued need for housing rehabilitation across the community.
- Participants noted the need for continued youth enrichment programs, particularly during these times of the global pandemic. These include:
 - Recreational programs for youth;
 - Community based supervision and services for justice involved youth; and
 - A wide variety of programming and services to meet the unique needs of all youth in the community.
- Many programs have been able to continue to provide services virtually or through modified, socially distant means.
- Participants also noted the continued need for supplemental home delivered meals to elderly and disabled residents, many who have less support options due to COVID.

6. Summary of comments or views not accepted and the reasons for not accepting them

To be completed after the document is on public display.

7. Summary

To be completed after the document is on public display.

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The City of Trenton Department of Housing & Economic Development – Division of Housing Production (HED-HP) is the entity responsible for preparing/administering the Consolidated Plan.

Agency Role	Name	Department/Agency
Lead Agency	City of Trenton	Department of Housing and Economic Development

TABLE 1 – RESPONSIBLE AGENCIES

Narrative (optional)

The lead agency for the Annual Plan (AP) is the Department of Housing and Economic Development (H&ED). The Division of Housing Production is responsible for the day-to-day administration of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG). HED worked with a number of entities, including community stakeholders, service providers and the Trenton/Mercer Continuum of Care (CoC) as well as residents and sub-recipients and other divisions within the City of Trenton in order to develop a meaningful document.

Consolidated Plan Public Contact Information

Inquiries, comments or complaints concerning the Plan, any amendments, or performance reports, can be conveyed by contacting City staff at:

City of Trenton
Department of Housing and Economic Development
319 East State Street - 3rd floor
Trenton NJ 08608
Phone: (609) 989-3516
fgee@trentonnj.org
Business Hours; 8:30 am – 4:30 pm, Monday through Friday AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Trenton developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notes, stakeholder meetings and telephone interviews.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Trenton works closely with the Trenton Housing Authority (THA). The THA is the grant recipient of a HUD Choice Neighborhood planning grant and the City is a part of this process. The City has also provided grant funds to THA for public housing modernization. The THA is also the developer of housing opportunities through a RAD conversion of the former Donnelly-Homes into a mixed income community.

The City is the lead entity for the Trenton/Mercer Continuum of Care (CoC). Through the Department of Health and Human Services, the City administers the CoC Program grant received from HUD. Through the COC the City maintains a close relationship with the mental health, and other service agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City's Department of Health and Human Services had been the lead agency for the Continuum of Care since its inception. The Health and Human Services Department provides staffing to administer the grants received from HUD for the various programs. Through the Department of Health and Human Services, the City administers the CoC Program grant received from HUD. There is a strong relationship between the City Departments in addressing homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Trenton Health and Human Services Department administers the programs of the Continuum of Care (COC) and works with the Executive Committee to develop the funding plan for the use of ESG funds as well as the development of the performance standards, outcome measures, and policies and procedures.

The Homeless Management Information System (HMIS) in New Jersey is administered by the NJHMFA. The COC requires that all programs participate in HMIS including all ESG funded programs.

The City of Trenton consulted with the lead agency for the Trenton/Mercer CoC, the Trenton Housing Authority, affordable housing providers and various social service providers. Additionally, the public, including but not limited to low- and moderate-income residents and other entities impacted by housing and community development activities, were noticed of public meetings by email, website, and flyers, and public hearings by newspaper advertisements

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Agency/Group/ Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?
City of Trenton Department of Health and Human Services	Other government - City	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy	The Department HHS is the lead on the COC. Several member agencies attended the stakeholder meetings. The COC was consulted through this process. Consultation will result in better coordination between the grants programs.
Trenton Housing Authority	PHA	PHA Needs Market Analysis Anti-poverty Strategy	This organization was consulted through the stakeholder process, in-person interviews and follow-up telephone conversations, as necessary. The City and THA have collaborated on several projects and will continue to do so through the Choice Neighborhoods planning grant.

City of Trenton	Housing Services-Elderly Persons Services-homeless Services-Health Other government - Local	Housing Need Assessment Economic Development	Various interviews and meetings with members of the Department of Housing & Economic Development. These departments use CDBG funds for various activities.
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TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED

Identify any Agency Types not consulted and provide rationale for not consulting

There were no types of agencies that the City did not consult, either through focus group meetings, personal interviews and/or questionnaires throughout the year.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Trenton	The goals of the COC were used in the development of the Strategic Plan. The City is the lead agency in both processes so the goals are the same.
Trenton 250 Plan	City of Trenton	The Comprehensive Plan directs growth in the City and is used to inform location decisions for housing projects
Mercer County Multi-Jurisdictional Hazard Mitigation Plan	Mercer County Office of Emergency Management	The Strategic Plan implementation will acknowledge the HMP goals and not place new housing in the flood plain or vulnerable sites.
Local Area Plan for the Workforce Innovation and Opportunity Act July 1, 2019 Modification	Mercer County Workforce Development Board	This plan identified local needs and initiatives for employment
Broadband Part One: Discussing the Technology	Delaware Valley Regional Planning Commission	This plan identified local needs and providers or broadband services.
Broadband Part Two: Understanding the Digital Divide	Delaware Valley Regional Planning Commission	This plan identified local needs and digital divide within the region.

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

On February 3, 2021, HUD issued a waiver allowing public hearings to be held virtually to allow for social distancing and limited public gatherings during a public health emergency. The City revised its Citizen Participation Plan to allow for virtual public meetings during public health emergencies. The City is continuing to follow local, state and federal recommendations to limit public gatherings during the COVID-19 public health emergency. As such, the City is utilizing the waiver during the development of its 2021 AAP and will solicit public comment and conduct public hearings in a virtual way in accordance with its Citizen Participation Plan. Accommodations were made for persons with disabilities and LEP persons. Documents for public review were shared via the City's website.

The City of Trenton's goal for citizen participation is to ensure broad participation of City residents, housing, economic, and service providers, city departments, nonprofit organizations, neighborhood groups, and other stakeholders in the planning and implementation of community development and housing programs.

For the development of the FY 2021 Action Plan, the City of Trenton held two public meetings that included a technical assistance workshop. The meetings were advertised in the Trenton Times as display advertisements. A housing and community development needs meeting was held on February 10, 2021. A second public meeting was held on April 7, 2021 to present a summary of the City's draft FY 2021 Annual Action Plan (AAP), to present the City's proposed allocations of FY 2021 CDBG, HOME, and ESG funds, and to review the City's past program performance. City Council approved submission of the AAP at the April 29, 2021 meeting. The plan will be submitted to HUD on or by May 15, 2021.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing/Technical Assistance Workshop	Non-targeted/broad community	50 persons attended the February 10, 2021 public needs hearing. The attendees represented a cross-section of social service and community organizations and general public members.	See Appendix	All comments were accepted.	
2	Public Hearing	Non-targeted/broad community	[will be completed after hearing]	will be completed after hearing]	will be completed after hearing]	
3	Public Meeting	Non-targeted/broad community	City Council provided an opportunity to comment prior to decision to approve the AAP.	will be completed after hearing]	will be completed after hearing]	

TABLE 4 – CITIZEN PARTICIPATION OUTREACH

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Trenton's total allocation is \$2,802,586 in CDBG funding, \$890,749 in HOME funding, and \$252,442 in ESG funding for FY 2021. There will be a reduction in the total CDBG allocation available for the 2021 plan due to a required voluntary grant repayment to HUD in the amount of \$248,345. The total CDBG funds available in 2021 is \$2,802,586.03. However, the City expects to return through a Voluntary Grant Reduction (VGR) for expenses found to be ineligible from FY 2008 and 2009, \$248,345. The effective CDBG budget will be \$2,554,241.03. These CDBG funds will be used for housing and community development activities including, but not limited to, increasing homeownership, public services, public improvements, and administration of the City's CDBG program. The total budget including CDBG, HOME and ESG funds is \$3,945,777 before the VGR.

Other resources, such as private and non-Federal public sources may become available to the City of Trenton during the program year. For CDBG leveraging, these include funding from State and Federal grant sources, City Departments (e.g. Public Works, Recreation), public or social service providers, or other sources. The City will also look to leverage funds, if available, from Community Housing Development Organizations (CHDOs), Public Housing Authority (PHA), or other agencies and programs against CDBG, HOME, and ESG dollars.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Admin and Planning Housing Public Improvements Public Services	\$2,802,586.03	\$0	\$0	\$2,802,586.03	\$8,407,758.09	Block grant from HUD to address housing, community development and economic development needs in the City. The expected amount available is three times the year one allocation.
HOME	Public-federal	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA Administration	\$890,749	\$0	\$0	\$890,749	\$2,672,247	Grant from HUD to address housing rehabilitation and development. The expected amount available is three times the year one allocation.
ESG	Public-federal	Street Outreach Emergency Shelter Homeless Prevention HMIS Administration	\$252,442	\$0	\$0	\$252,442	\$757,326	Grant from HUD to address needs of persons who are homeless. The expected amount available is three times the year one allocation

TABLE 5 - EXPECTED RESOURCES – PRIORITY TABLE

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City has continuously sought public and private resources to leverage its entitlement funds in assisting with implementation of policies and programs to create the vision. This Annual Action Plan leverages many different resources, beyond CDBG, ESG, and HOME to meet the priority needs and goals set forth in the Consolidated Plan. The City of Trenton is adept at leveraging resources from all levels of government, as are for-profit and non-profit organizations that address the many needs in the community.

The Emergency Solutions Grant Program and the HOME Program require matching funds. All applicants to these programs must identify the match in the applications for funding from the Department of Housing and Economic Development. All matching sources are verified prior to commitment of any federal funds.

The City has not committed any funds specifically to provide a monetary match to any activity but may provide the match for Emergency Solutions Grant activities through local grant-in-aid to homeless service providers. Sponsors of HOME activities are responsible to provide their match. Specific matching requirements will be met as follows:

- HOME: The City of Trenton has a 100% match reduction.
- ESG: The City must provide a 1:1 match for funding provided from the Emergency Solutions Grant Program. Match funds are provided by subgrantees.

The City and Trenton Housing Authority has been awarded a Choice Neighborhood Planning Grant. The Choice Neighborhoods Planning Grant (CNI) is a grant issued by the U.S. Department of Housing and Urban Development (HUD) and the successor program to HOPE VI. The City of Trenton is the Co-Applicant with the Trenton Housing Authority as the Lead Applicant for the CNI Planning and Action grant. The CNI Planning and Action Grant is approx. \$1.3 million dollars. The CNI planning process will take approximately 2 years, followed by an Action Activity Implementation process of approximately 1.5 years.

The Choice Neighborhoods Planning Grant program leverages significant public and private dollars to support locally driven strategies that address struggling neighborhoods with distressed public or HUD-assisted housing through a comprehensive approach to neighborhood transformation. Local leaders, residents, and stakeholders, such as public housing authorities, cities, schools, police, business owners, nonprofits, and private developers, come together to create and implement a plan that revitalizes distressed HUD housing and addresses the challenges in the surrounding neighborhood. The program helps communities transform neighborhoods by redeveloping severely distressed public and/or HUD-assisted housing and catalyzing critical improvements in the neighborhood, including vacant property, housing, businesses, services and schools.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City concluded a study in 2020 that identified vacant structures throughout the City. The City has a number of these that were acquired through Tax Foreclosure. The City has been auctioning off the properties which local contractors and small local developers are purchasing and rehabilitating to create new housing opportunities. Other properties owned by the City are not suitable for rehabilitation and are being demolished through the NJHMFA Demolition program, part of which is under the CDBG program.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase the number of affordable units	2021	2022	Affordable Housing	City of Trenton Residents Choice Neighborhood North Trenton	Create and Maintain Affordable Housing	CDBG: \$75,000 HOME: \$614,474	Units Constructed: 10 housing units Homeowner Housing Rehabilitated: 1 unit Financial Assistance to Homebuyers: 7 households
2	Improve Public Facilities	2021	2022	Non-Housing Community Development	City of Trenton Residents Choice Neighborhood North Trenton	Improve Public Facilities	CDBG: \$1,421,393	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 92400 persons

3	Support Public Services	2021	2022	Non-Homeless Special Needs	City of Trenton Residents	Support Public Services	CDBG: \$547,000	Public Service activities other than Low/Moderate Income Housing Benefit: 525 persons
4	Provide housing and services to Persons who are homeless	2021	2022	Homeless	City of Trenton Residents	Provide Homeless Housing and Services	ESG: \$252,442 HOME: \$187,200	Homeless Person Overnight Shelter: 1500 persons Homelessness Prevention: 26 persons
5	Planning and Administration	2021	2022	Other	City of Trenton Residents Choice Neighborhood North Trenton	Planning and Administration	CDBG: \$510,848.00 HOME: \$89,074.90	Other

TABLE 6 – GOALS SUMMARY

TABLE 7 GOAL DESCRIPTIONS

1	Goal Name	Increase the number of affordable units
	Goal Description	<p>Continue the housing rehabilitation, first-time homebuyer, and new housing construction activities to maintain existing housing and to support an increase in the number of affordable units in the City of Trenton.</p> <ul style="list-style-type: none"> • Support and improve partnerships and programs that reduce housing vacancies and strengthen neighborhoods. • Expand affordable homeownership opportunities for all households by maintaining and expanding existing homeownership opportunities. • Support City-wide emergency repair for owner-occupied income-qualified owners throughout the City. • Diversify the City’s housing stock, including the development of rental housing, to low anyone to make Trenton their home.
2	Goal Name	Blight Removal
	Goal Description	<p>The City of Trenton will promote neighborhood revitalization and activities to enhance the quality of life for residents in low- and moderate-income areas. The City of Trenton seeks to improve the sustainability of suitable living environments by acquiring strategically located buildings for redevelopment.</p>
3	Goal Name	Improve Public Infrastructure
	Goal Description	<p>The City of Trenton will enjoy a system of reliable and efficient infrastructure tailored to meet local needs provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner.</p> <ul style="list-style-type: none"> • Develop a well-maintained and efficient network of roads and streets to facilitate the safe and efficient movement of vehicles. Repair and right-size key neighborhood infrastructure to increase resident safety, quality of life, and efficiency. • Leverage green technology to reduce energy costs, improve air quality, and increase long-term sustainability.
4	Goal Name	Improve Public Facilities
	Goal Description	<p>The City of Trenton will have a network of comprehensive community facilities and services provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner.</p> <ul style="list-style-type: none"> • Provide parks, open space, and recreation infrastructure that both meets the needs of the community and is maintainable by the City and its community partners.

5	Goal Name	Support public services
	Goal Description	<p>Support non-housing community development supportive services</p> <ul style="list-style-type: none"> • Provide operating support for the Trenton Senior Centers • Strengthen the educational attainment of youth. • Promote literacy programs. • Provide services to residents to improve skills and increase access to employment opportunities.
6	Goal Name	Provide housing and services to Persons who are homeless
	Goal Description	<p>Preservation of short- and long-term homeless facilities and associated services.</p> <ul style="list-style-type: none"> • Increase housing stock/options that are affordable to extremely low-income households. • Develop an inventory of interim housing units for those whom a “Housing First” strategy is inappropriate • (such as the chronically homeless, people in recovery or families fleeing an immediate domestic violence • situation). • Increase permanent supportive housing with appropriate and available services and supports. • Link interim housing consumers to placement in permanent housing as soon as is practical for the client.
9	Goal Name	Planning and administration
	Goal Description	Planning and administration of the CDBG, HOME, and ESG programs.

Projects

AP-35 Projects – 91.220(d)

Projects

#	Project Name
1	Senior Center Operations 2021
2	CEASe Center Operations
3	City Park improvements
4	Public Facility Improvements
5	Job Training
6	Youth Education and Recreation Enrichment
7	First Time Homebuyer Assistance
8	ESG 2021
9	HOME CHDO Set Aside
10	HOME TBRA
11	HOME Project
12	Administration 2021

TABLE 8 - PROJECT INFORMATION

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Trenton’s 2021 Action Plan is based the needs identified in the Five-Year Consolidated Plan.

The City anticipates that 100% of its CDBG resources this year, other than those allocated for administration/planning will be spent to benefit low- and moderate-income residents. The primary obstacle to meeting underserved needs is limited resources to meet the competing demands.

Due to the uncertainty of the Covid-19 pandemic, the City will set aside funding for youth educational and recreational public services programs to be determined by the restrictions set for public gatherings. The city will continue to fund the Senior Center operations in FY 2021.

Funding for ESG activities was divided into four categories: 1) Homeless Prevention; 2) Operations and Support for Emergency Shelters; and 3) HMIS. The selection process was outlined to give funding priority to projects that:

- Were clearly defined as to scope, location, need, budget, and goals
- Met the Consolidated Five-Year Housing and Community Development Plan Strategic Goals
- Can begin immediately and finish within the contracted time
- Demonstrate the applicant has the capacity and the capability to carry out the project

successfully

- Establish means for program evaluation and accomplishment tracking
- Have adequate community support, and address an identified community need
- Impact a significant number and/or percentage of low- and moderate-income persons
- Maximize the use of outside funds and services and coordinate with other public and private efforts
- Help end homelessness and/or create connections with employment in the community.

DRAFT

AP-38 Project Summary

TABLE 9 PROJECT SUMMARY INFORMATION

1	Project Name	Senior Center Operations 2021
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Enhance Public Services
	Needs Addressed	Enhance Public Services
	Funding	CDBG: \$172,000
	Description	Provide staffing and operations for senior centers in the City of Trenton.
	Target Date	6/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Approximately 100 seniors will be served
	<i>Location Description</i>	Various
	<i>Planned Activities</i>	Operation expenses including staff salaries and fringe benefits.
2	Project Name	CEASe Center Operations
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Support Public Services
	Needs Addressed	Support Public Services
	Funding	CDBG: \$75,000
	Description	The CEASe Center collaborates with community partners to link homeless individuals and unaccompanied youth between the ages of 18 – 21 to housing and housing related services. A staff person provides Case Management services to near homeless persons to provide homeless prevention.
	Target Date	06/30/2022

	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Approximately 125 homeless households will be served.
	<i>Location Description</i>	509 Perry Street
	<i>Planned Activities</i>	Case Management services at the CEASe Center.
3	Project Name	City Park Improvements
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$400,000
	Description	The City's Recreation, Natural Resources and Culture Department will identify one or more parks and playgrounds that will be rehabilitated.
	Target Date	06/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	84,000 households
	<i>Location Description</i>	Various
	<i>Planned Activities</i>	Rehabilitation of City parks and playgrounds.
4	Project Name	Public Facility Improvements
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$1,021,393
	Description	Public Facility improvements may include rehabilitation to some or all of the City Owned Public facilities, including Libraries, learning centers and recreation centers. A comprehensive list of improvements was created and will be used to select projects over the next several years.
	Target Date	06/30/2022

	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Approximately 8400 households will benefit
	<i>Location Description</i>	Various
	<i>Planned Activities</i>	Rehabilitation of facilities.
5	Project Name	Job Training
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Support Public Services
	Needs Addressed	Support Public Services
	Funding	CDBG: \$50,000
	Description	The City will partner with a local non-profit or institution of higher learning to provide vocational services to low-to moderate income residents. Program details will be made available after an RFP process and subgrantee selection is made.
	Target Date	06/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Approximately 50 persons
	<i>Location Description</i>	TBD
	<i>Planned Activities</i>	Services may include but not limited to workforce development programs, vocational and life-skills training, skill building services, job placement and retention services, and adult education.
6	Project Name	Youth Education and Recreation Enrichment
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Support Public Services
	Needs Addressed	Support Public Services
	Funding	CDBG: \$250,000

	Description	The City will partner with local non-profit organizations to provide educational and recreation enrichment services to area youth.
	Target Date	06/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	250 households
	<i>Location Description</i>	TBD
	<i>Planned Activities</i>	Youth education and recreational services to include but not limited to after school enrichment activities, summer youth programs, services for criminal justice involved youth, mentoring and education services, and life-skills training.
7	Project Name	First Time Homebuyer Assistance
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Increase the number of affordable units
	Needs Addressed	Create and maintain affordable housing
	Funding	CDBG: \$75,000
	Description	Financial assistance is provided in the form of closing cost assistance and a matching down payment to qualified first time homebuyers. Financial assistance is based on the buyer's household income, assets and homeowner history, an approved first mortgage loan terms and interest rate, meeting all program criteria, and the purchase of an eligible property in the City of Trenton.
	Target Date	06/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	7 households
	<i>Location Description</i>	TBD
	<i>Planned Activities</i>	Closing cost assistance and matching down payment assisted to qualified first-time homebuyers.

8	Project Name	ESG 2021
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Provide Housing and Services to Persons Who Are Homeless
	Needs Addressed	Provide Homeless Housing and Services
	Funding	ESG: \$252,442
	Description	Funding from the Emergency Solutions Grant program for Homeless Prevention, Emergency Shelter Operations and Essential Services and Administration of the ESG program to the following agencies: ESG funds will be provided to Anchor House (\$50,000), Rescue Mission (\$30,000) and Homefront (\$30,000) for Emergency Shelter. ESG funds will also be provided for Homeless Prevention (\$108,942). In addition, ESG funds will be used to support the HMIS system (\$15,000) and ESG Administration: (\$18,500).
	Target Date	06/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	1500 shelter nights provided: 14 families with homeless prevention assistance
	<i>Location Description</i>	Various
	<i>Planned Activities</i>	Emergency Shelter, Homeless Prevention, HMIS, Admin
9	Project Name	HOME CHDO Set Aside
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Increase the number of affordable units
	Needs Addressed	Create and maintain affordable housing
	Funding	HOME: \$133,612.35
	Description	The City will identify an organization interested in purchasing and rehabilitating homes in their neighborhood for resale to low- and moderate- income buyers.
	Target Date	06/30/2022

10	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	1 low-income household.
	<i>Location Description</i>	City of Trenton
	<i>Planned Activities</i>	Single-family rehabilitations.
	Project Name	HOME TBRA
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Increase the number of affordable units
	Needs Addressed	Create and maintain affordable housing
	Funding	HOME: \$187,200
	Description	Program will provide assistance to individual households to help them afford the housing costs of market-rate units, by providing payments to make up the difference between the amount a household can afford to pay for housing and the local rent standards.
	Target Date	06/30/2022
11	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	12 households
	<i>Location Description</i>	Various Location
	<i>Planned Activities</i>	Tenant based rental assistance
	Project Name	HOME Project
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Increase the number of affordable units
	Needs Addressed	Create and maintain affordable housing
	Funding	HOME: \$480,861.75
	Description	Housing development
Target Date	06/30/2022	

	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Approximately 10 households will benefit.
	<i>Location Description</i>	City of Trenton
	<i>Planned Activities</i>	Housing development.
12	Project Name	Administration 2021
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$510,848.03 HOME: \$89,074.90
	Description	CDBG and HOME program administration
	Target Date	6/30/2022
	<i>Estimate the number and type of families that will benefit from the proposed activities</i>	N/A
	<i>Location Description</i>	N/A
	<i>Planned Activities</i>	CDBG and HOME program administration
	Project Name	Unallocated
	Target Area	
	Goals Supported	
	Needs Addressed	

Funding	CDBG: \$248,345
Description	CDBG Voluntary Grant Reduction due to ineligible activities in FY 2008, 2009
Target Date	9/30/2021
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	N/A
Planned Activities	HUD will recapture funds due to insufficient file documentation of national objective compliance from older program years.

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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

By federal regulation, 70% of CDBG funds must be spent in neighborhoods where at least 51% of the population is Low and Moderate Income (LMI). New Census Data issued by HUD Effective April 1, 2019 shows that portions of all census tracts in the city meet the LMI criteria with one exception (Census Tract 6, or the Villa Park neighborhood). Census Tract 13 is the only other non-LMI census tract.

There are clear patterns of racial segregation throughout the City. Tract data from the 2011-2015 American Community Survey shows evidence of minority concentration with respect to both the African American and Latino populations. Approximately 62% of the City's African American population lived in tracts in which 65% or more of the population was African American. The Latino population was concentrated in the city's South and East wards, Census Tracts 1, 4, 9, 10, 21 and 22.

Geographic Distribution

Target Area	Percentage of Funds
City of Trenton Residents	41%
North Trenton	59%

TABLE 10 - GEOGRAPHIC DISTRIBUTION

Rationale for the priorities for allocating investments geographically

CDBG and HOME funds are intended to provide low and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities to be funded with CDBG funds include public improvements, housing rehabilitation and preservation, affordable housing development activities, public services, planning, and administration. ESG funds are intended to address homelessness.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program.
- Meeting the needs of very-low, low-, and moderate-income residents.
- Focusing on low- and moderate-income persons, areas, or neighborhoods.
- Coordinating and leveraging of resources.
- Responding to expressed needs.

Most of the planned activities are non-site specific. Housing rehabilitation, historic preservation and accessibility projects will be undertaken City-wide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	26
Non-Homeless	19
Special-Needs	0
Total	45

TABLE 11 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households Supported Through	
Rental Assistance	26
The Production of New Units	
Rehab of Existing Units	11
Acquisition of Existing Units	7
Total	45

TABLE 12 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

Discussion

Rental Assistance will be provided to 14 households through the ESG Homeless Prevention Program and 12 households through the HOME TBRA program.

The CHDO set aside will fund 1 new or substantially rehabilitated unit and the HOME Project will rehabilitate 10 housing units. Acquisition of existing units will be for 7 households assisted through the first-time homebuyers program.

AP-60 Public Housing – 91.220(h)

Introduction

The Trenton Housing Authority (THA) provides public housing within the City of Trenton.

Actions planned during the next year to address the needs to public housing

In the 2021 Annual Plan, THA will be conducting an authority-wide portfolio analysis of its housing stock. THA will then develop plans to modernize and/or preserve its housing stock.

THA also was a successful applicant in the Rental Assistance Demonstration (RAD) program. As part of this application, THA received an award to convert 77 units at its Page Homes Development, now named Turner Pointe, to Project Based Rental Assistance. The ribbon cutting for the completion of the three-story townhome buildings was in October 2020. THA already began leasing and accepting additional applications for the project.

THA also submitted RAD applications for several developments and plans to apply for RAD for the remainder of public housing units once other conversions are underway.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Trenton Housing Authority (THA) has established a Resident Advisory Board. Tenants are recommended to this board by their property managers as a tenant who is involved in their residential community and is in good tenant standing with THA. The purpose of the RAB is to include THA residents in the THA's strategic planning and redevelopment efforts. The RAB will provide THA staff and residents with a forum for sharing information and providing input concerning the THA's Annual and Five-Year Plans. The main role of the RAB is to make recommendations regarding the development of the THA's Annual and Five-Year Plans and to provide input related to THA's public housing redevelopment efforts. Even throughout the global pandemic, THA has provided public housing residents opportunities to be involved and provide input. THA made meetings available using virtual platforms and set up socially distanced areas in community spaces to display meetings. THA also provided tablets to residents to ensure access to the internet.

Trenton Housing Authority has promoted the development of resident councils for the various housing sites and encourage resident leaders to participate. The resident council are charged with communicating with THA and property management staff about programming and service needs and other resident concerns that may emerge. These resident councils have input/involvement with THA management operations and modernization needs. The resident council is opened to all families at their residential developments. Some Resident council officers serve on THA's Resident Advisory Board (RAB).

Trenton Housing Authority created an endowment trust from the remaining HOPE VI program funds. These funds were designed to continue services for households in meeting their self-sufficiency goals, especially those associated with maintaining residency, and for some, moving out of subsidized housing. In addition, these funds will go to promote family self-sufficiency through family stability and increased

opportunities for case management, supportive services, stable employment, job training, education programs, higher paying jobs, financial literacy, and homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable. The THA is not designated troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Trenton/Mercer Continuum of Care has a comprehensive a Coordinated Assessment System that targets and prioritizes the most vulnerable persons experiencing homelessness in the community. The CoC Program interim rule (24 CFR 578) released by HUD in 2012 requires that CoCs establish and operate a “centralized or coordinated assessment system,” hereafter referred to as a coordinated entry system. The rule defines coordinated entry as a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. [Such a] system covers the [CoC’s] geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardize assessment tool. (24 CFR part 578.3)

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Trenton/Mercer Coordinated Assessment System has a process for homeless individuals and families. From January 1, 2020 through December 31, 2020 a total of 563 assessments were completed.

- a. For individuals unaccompanied by children, CoC has a Coordinated Entry and Assessment System (CEASe) for individuals experiencing homelessness. This system operates as the point of entry to access housing and community services for homeless individuals. Through a coordinated assessment process, the needs of the homeless are identified and prioritized and a plan to move from homelessness to housing is developed. The goal of this system is to prioritize chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
- b. For homeless households with children, a centralized intake is in place at the Mercer County Board of Social Services that seeks to mediate/prevent homelessness whenever possible and reduce the length of time families are homeless through a rapid rehousing - a model that places a priority on moving a family experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of a family becoming homeless. A Universal screening Tool is used to identify and prioritize families for services with a primary goal of returning the family to permanent housing.

The City of Trenton, the Mercer County Department of Human Services and the Mercer County Board of Social Services have been pursuing a system change planning and implementation process centered around Mercer County's Ten-Year Plan to End Homelessness. The City of Trenton, Department of Health and Human Services is the lead agency for planning and grant applications under the Trenton/Mercer Continuum of Care process. The Continuum is made up of over 40 social service providers: both governmental and non-profit organizations.

The Trenton/Mercer CoC coordinates a broad array of services that includes, but is not limited to:

- Outreach Assessments

- Prevention of Homelessness
- Emergency Shelter/Services
- Rapid Rehousing
- Transitional Housing
- Case management/Support Services
- Permanent Housing
- Education Resources

Addressing the emergency shelter and transitional housing needs of homeless persons

The agencies in the City provide an array of Shelter and Transitional housing facilities, although the latter are being phased out and converted to permanent housing. The City is supporting emergency shelters with support for operations and capital improvements. ESG Funds have been allocated for shelter operations and essential services and homeless prevention.

The City also received CARES Act funding that will be used to address the needs of persons experiencing homelessness. In the spring of 2020 the City funded projects to address shelter operations and homeless prevention. With the second allocations of ESG-CV funds, the City will prioritize projects that provide rapid rehousing assistance to homeless individuals and families, emergency shelter operations and essential service and street outreach.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Trenton/Mercer CoC, led by the City of Trenton, has made great strides in helping families and individuals move from homelessness to housing. The CEASe System prioritizes the most vulnerable persons experiencing homelessness in the community by utilization the prioritization policy established by the CoC. The goal is to move those designated with the highest priority to housing within 30 days. The CEASe Center serves as the single point of entry for homeless individuals and will collect information on homeless individuals and coordinate resources, services and outreach activities that facilitate housing for homeless singles. All individuals, both sheltered and unsheltered, are screened and assessed and a housing plan is developed based on the person's homeless history and level of need, with priority given to the chronically homeless.

In calendar year 2020, 255 single households and 155 family households were placed into permanent housing. Of the single households permanently housed, 19% were assisted through Rapid Rehousing.

Over 50% of family households permanently housed, were assisted through Rapid Rehousing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Trenton/Mercer CoC works the systems of care to provide appropriate discharge planning and housing for persons leaving institutions. The COC worked with the New Jersey Policy academy to develop the State's discharge plan. The vision for this plan is one that plans for greater coordination of services and programs required to address homelessness in New Jersey including the promotion of prevention strategies and services to prevent homelessness and reduce the risk of homelessness for families and individuals.

The New Jersey Department of Human Services Division of Mental Health Services, New Jersey Department of Children and Families, Division of Youth and Family Services, Division of Developmental Disabilities, and the New Jersey Department of Corrections in conjunction with the Department of Health and Senior Services Division of AIDS, prevents discharges from facilities without the immediate provision of shelter. The State's plan guarantees no persons being discharged from and institutional setting into homelessness.

Since Foster Care in New Jersey is a statewide system it is part of this statewide discharge policy. Specially, the case worker works with the youth to identify available Trenton and Mercer County City and County resources and appropriate housing. Under current New Jersey child welfare reform legislation, several new programs have been implemented that allow for a more seamless transition from youth to adulthood. Many of these programs include permanent housing.

As a result of the economic strain many households are experiencing during the global pandemic, the City of Trenton will utilize federal CARES Act funds from HUD and US Treasury to meet the needs of households who are behind in paying their rent and/or mortgages in order to prevent future homelessness. The US Census Pulse Survey for January 20, 2021 through February 1, 2021, shows that of the 342,837 homeowners who completed the survey in New Jersey, 19% feel it is very likely or somewhat likely they will have to leave their current housing in the next two months due to foreclosure. For this same period, 37% of the 246,847 New Jersey renters feel it is very likely or somewhat likely they will have to leave their current housing in the next two months due to eviction.

Utilizing CARES Act funding, the City provided rent assistance, TBRA and other assistance to stabilize housing. Under the third allocation of CARES Act funds, additional resources will go to help with utilities

along with the Rental Assistance program administered by the County.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Income and a shortage of good quality affordable housing are barriers to homeownership in the City of Trenton. The City's goals are to improve job opportunities for all Trentonians and improve the quality of the housing stock.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

During the Consolidated Planning process, stakeholders identified difficulty in getting home improvement loans and mortgages.

Structural issues in banking have been identified. The loan to value ratio is negatively impacted by improvement assistance from the City. When the City places even a subordinated mortgage on the property for rehabilitation or homebuyer assistance it raises the loan to value ratio to above both the sales price and the appraised value of the home, creating a situation lenders perceive as high risk.

Another issue is that many housing subsidy programs require affordability controls in the form of deed restrictions that do not extinguish in the case of foreclosure. It has become a problem over the last few years because lenders are relying increasingly on FHA to insure their mortgages, rather than private mortgage insurance companies, and FHA rules prohibit them from insuring mortgages that have deed restrictions that survive foreclosure. While this rule has been on the books at FHA for years, it apparently wasn't as aggressively enforced.

These issues combine in a way that is severely limiting the availability of home purchase financing for subsidized homes in Trenton. The City has successfully worked with local lending institutions to address these barriers and has found lenders that can underwrite loans with subordinated loans. The City has funds remaining from prior years to continue the Homebuyer Assistance Program.

Stakeholders during the 2021 AAP process noted an overall lack of affordable housing in the community and noted some are unaware of the State's website which lists affordable housing units in a consolidated place.

AP-85 Other Actions – 91.220(k)

Introduction:

In 2021 the City of Trenton plans the following actions to help address the housing and community development needs of City residents, especially low/moderate income residents.

Actions planned to address obstacles to meeting underserved needs

The chief obstacle to meeting underserved needs is a lack of, or inadequate, resources---both financial and human (staffing). The City of Trenton received nearly a 700% increase in federal CDBG and ESG funds under the CARES Act. The increase in financial resources highlighted the capacity issues many human and social service agencies face. The City of Trenton will continue to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the service needs of City residents. The City will support the efforts of service agencies to maximize the use of available resources and to obtain additional resources whenever possible.

The City is focusing heavily on improving project management and greater system-wide efficiencies. The City will continue to improve staffing through additional training on CDBG, HOME, and ESG programs, providing the ability to maximize limited resources to address underserved needs.

Utilizing CARES Act funding, the City provided rent assistance, TBRA and other assistance to stabilize housing. Under the third allocation of CARES Act funds, additional resources will go to help with utilities along with the Rental Assistance program administered by the County.

Actions planned to foster and maintain affordable housing

The City of Trenton will continue to create and maintain affordable housing. The City will continue to support its goal of maintaining and expanding affordable housing by utilizing its CDBG and HOME allocations to create new opportunities for affordable rental and homeownership and rehabilitate existing affordable units. Several new housing rehabilitation programs will be created to enable the funds to reach more homeowners. An accessibility program allows seniors and persons with disabilities to stay in their homes while an urgent need rehabilitation program addresses specific housing issues that might force a family to become homeless such as a heating unit that does not work or roof leaks. Funds have been allocated for rehabilitation of facades of homes in historic areas. HOME funds will be used to support creation of new rental units and to support a CHDO with a home rehabilitation for resale.

Actions planned to reduce lead-based paint hazards

If a rehabilitation activity funded by CDBG or HOME disturbs a painted surface, then lead-based paint tests will be done to determine if the area of impact or other parts of the home have lead-based paint that poses a hazard for the homeowner. When a project is over \$5,000 but less than \$25,000, interim controls measures will be taken to remove the lead-based paint hazards throughout the home. Projects under \$5,000 will require that the immediate area be addressed.

In February 2021, the City of Trenton launched the Trenton Urgent Rehabilitation Program (TURP), which provides up to \$5,000 to qualifying homeowners in need of an urgent or accessibility-related repair and \$1,000 for lead service line replacement. Financial assistance will be provided to homeowners in the form of a grant, with no lien filed on the property. Funds must be used on repairs that pose an immediate risk to homeowner's health and safety or provide accessibility improvements to elderly or disabled homeowners. Eligible repairs include heaters, water heaters, plumbing, electrical, sewer, and severely leaking roofs. Accessibility improvements include wheelchair ramps, grab bars in showers, and accessible toilets. This initiative is backed by \$750,000 in Community Development Block Grant (CDBG) funds.

Actions planned to reduce the number of poverty-level families

The resources that the City of Trenton has to reduce the number of persons with incomes below the poverty level are limited. The City will continue to pursue and support various economic development and housing activities in an effort to provide an environment that will attract and retain businesses or facilitate the expansion of existing businesses thereby securing employment and increased incomes for City residents.

Actions planned to develop institutional structure

The City will endeavor to fill the position of HOME Program specialist. This is a gap in staffing that must be filled. Meanwhile the CDBG staff will fill the role with the assistance of a consultant.

The City of Trenton relies on a network of public sector, private sector, and non-profit organizations to deliver needed housing and community development services to City residents, particularly the homeless and special needs populations. Many of the organizations in the network operate on a county or regional level.

The demand for services greatly exceeds the available resources. The City of Trenton will continue to collaborate with human and social service agencies and the Trenton/Mercer County Continuum of Care (CoC) to identify potential resources for meeting the service needs of City residents. The City will support the efforts of service agencies to obtain any available or future resources.

Actions planned to enhance coordination between public and private housing and social service agencies

The Department of Housing and Economic Development (HE&D) is the lead agency responsible for administering the City's CDBG, ESG and HOME programs. HE&D works with the Department of Health and Human Services, and the Department of Public Works to coordinate activities undertaken in the Action Plan. The Department of Health and Human Services assists in the administration of the City's ESG program.

The Trenton/ Mercer CoC is a planning committee that reviews, evaluates, maintains and develops ongoing strategies to address quality of life issues for the residents of Mercer County who may be homeless or in jeopardy of homelessness. The CoC has developed a system-wide approach for implementation of the HEARTH Act which is to consolidate homeless assistance programs, codify the CoC

planning process, and establish a goal of ensuring that families who become homeless return to permanent housing with 30 days.

The Mercer County CoC has been a partner in the development of this Action Plan.

In addition, the City of Trenton, Office of Adult and Family Services provides a number of services which address the needs of persons who are not homeless, disabled, mentally & physically ill and who require supportive housing. These services include: (a) rental assistance to families and individuals in order to prevent homelessness (b) intensive and comprehensive case management services (c) referrals to other social services agencies which include substance abuse, mental health counseling, medical and dental services and educational and occupational training (e) referrals for emergency food, clothing and furniture (f) provide information for budget management, cleaning up personal credit, buying a home and preventing foreclosures.

The City continues to work with a host of social service providers including:

- Mercer Arc - provides services for the developmentally disabled.
- Family Guidance Center- operates a Consumer Credit Counseling component and representative payee services for recipients of Social Security Income (SSI) and Social Security Disability Income (SSDI).
- Oaks Integrated Care - provides supportive services focus on mental health issues
- Mercer County Office on Aging - provides supportive services, meals and other services to the elderly.
- Trenton Treatment Center - provides substance abuse counseling and treatment to drug and alcohol addicts.
- Catholic Charities Diocese of Trenton – mental health services including addiction focused treatment, residential services, and counseling services.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

This section of the Action Plan contains information on funding for the City's CDBG program, including program income, proceeds from Section 108 loans, and other revenue anticipated to be received by the City (\$0)

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income	\$0

Other CDBG Requirements

1. The amount of urgent need activities	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
All HOME funds will be invested in a manner consistent with 24 CFR 92.205(b){I}. Specifically, HOME funds are invested as construction financing for new construction and gut rehabilitation projects.

The City of Trenton HOME Program provides incentives to developers, for-profit and non-profit, to develop and support affordable rental housing and homeownership. New construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, are all considered eligible uses of HOME program funds. All HOME funded housing must be permanent.

The City accepts applications on a rolling basis which are available at www.TrentonNJ.org/HOME. Applications are funded based on availability of HOME funds and readiness to undertake the project.

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

To promote affordable housing, the City of Trenton is outreaching to organizations that may be eligible to be a CHDO. Once identified, the City will work with the CHDO to fund the rehabilitation of a unit for sale to a low- and moderate-income household. The sale will be subject to resale restrictions. The buyer will enter into an Affordable Housing Agreement with the City which requires that the buyer occupy the unit as their principal residence, and that they sell their unit only to another income-eligible buyer. The future resale price will be based on the original purchase price, plus an annual return on equity utilizing the regional income limits established by the NJ Council on Affordable Housing (COAH) per N.J.A.C. 5:97-9.3 as well as allowances for eligible capital improvements which may include any additions, exterior improvements such as windows, doors, solar panels, HVAC, or other energy-efficiency improvement to the housing unit. Per COAH guidelines, the price of owner-occupied low and moderate-income units may increase annually based on the percentage increase in the regional median income limit for each housing region. In no event shall the maximum resale price be lower than the last recorded purchase price.

The resale prices shall be restricted to the maximum sale value set by HOME – 95% of the median area purchase price.

The length of the affordability period will be determined by the amount of direct homeowner subsidy as shown below. CHDOs are limited to providing 10% in homebuyer assistance. The City may provide additional assistance from the CDBG Homebuyer Assistance program.

Rental Housing Activity	Minimum period of affordability in years
Rehabilitation or acquisition of existing housing per unit amount of HOME funds: Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

The CHDO, when identified, will be responsible for carrying out an outreach program to solicit

buyers. The City will review and approve the plan and monitor the implementation. There is a problem in that there is lack of capacity among the several certified Community Housing Development Organizations (CHDOS) in the City which has resulted in a lack of projects. The City of Trenton will commit the statutory 15% CHDO set aside for several projects and to working with the CHDOs to build capacity.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City will utilize a resale provision for homeownership units to ensure the long-term affordability of units. The City of Trenton has chosen to comply with the HOME program requirements by choosing resale provisions to preserve the affordability of units during the HOME period of affordability. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via covenants running with the land. The resale provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

The HOME resale provisions are established at §92.254 (a)(5)(i and ii), and permit the original homebuyer to sell the property to any income qualified buyer during the period of affordability. The City will only recapture Direct HOME Subsidy from the original buyer.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City will utilize a resale provision for homeownership units to ensure the long-term affordability of units. For HOME-assisted homebuyer units under the resale option, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods.

If the total HOME investment direct subsidy in the unit is:	The period of affordability is:
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

The HOME resale provisions are established at §92.254 (a)(5)(i and ii), and permit the original homebuyer to sell the property to any income qualified buyer during the period of affordability. The City will only recapture Direct HOME Subsidy from the original buyer.

Direct HOME subsidy is defined as the amount of HOME assistance, including any program income, which enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer.

In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value, the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

Enforcement mechanisms to be used to impose the City's resale provisions is a recorded mortgage and note or covenants running with the land that incorporates the resale provisions and details the period of affordability based on the amount of direct HOME funds invested in project.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Trenton does not use HOME funds to refinance existing debt.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment) The City of Trenton ESG Program Handbook that is attached to each contract with subrecipients. This Program Handbook includes definitions of ESG terms and activities, general ESG requirements including eligible services and activities and system wide program standards, descriptions of program activities and all forms necessary for program implementation. A copy of the primer is attached to this document.

The COC Board is the advisory committee for review and recommendations for funding under ESG. The COC Board includes persons who are homeless or recently homeless.

The City will continue to help sub-recipients reach their goals through the use of performance-based contracts and conducting reviews of monthly programmatic reports. The contracts will continue to outline specific target timeframes for achieving specific goals and plans for addressing non-performance issues. Discussions and meetings will continue to be held to discuss performance issues and recommended solutions. A review of the recommendations within a reasonable timeframe will determine if issues were resolved. Severe performance issues that are not reasonably addressed may jeopardize the sub-recipients future funding opportunities.

2. If the Continuum of Care has established centralized or coordinated assessment system that

meets HUD requirements, describe that centralized or coordinated assessment system.

The Trenton/Mercer Continuum of Care, through a comprehensive Coordinated Assessment Process, targets and prioritizes the most vulnerable persons experiencing homelessness in the community. The CoC follows a two-part coordinated assessment process for families and individuals.

- a. For homeless households with children, a centralized intake is in place at the Mercer County Board of Social Services that seeks to mediate/prevent homelessness whenever possible and reduce the length of time families are homeless through a rapid rehousing - a model that places a priority on moving a family experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of a family becoming homeless. A Universal screening Tool is used to identify and prioritize families for services with a primary goal of returning the family to permanent housing.
 - b. For individuals unaccompanied by children, CoC has developed a Coordinated Entry and Assessment System (CEASe) for individuals experiencing homelessness. This system operates as the point of entry to access housing and community services for homeless individuals. Through a coordinated assessment process, the needs of the homeless are identified and prioritized and a plan to move from homelessness to housing is developed. The goal of this system is to prioritize chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
 - During day time business hours, homeless individuals are directed to the Mercer County Board of Social Services. Screening and assessments are conducted to determine housing needs and eligibility to benefits (emergency assistance). For those persons who cannot be diverted from the system, emergency shelter referrals are provided.
 - After business hours, homeless individuals are directed to the Rescue Mission Emergency Shelter where screening for housing need and shelter services are provided.
 - Additional System Access Points will be added as the system develops.
 - A screening tool is used to assess individuals for vulnerability risk factors and chronic homelessness.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Under Title I of the Housing and Community Development Act of 1974, as amended, cities such as Trenton receive formula-based entitlement grants from the US Department of Housing and Urban Development (HUD) each year. Among them is the Emergency Solutions Grant (ESG).

Nonprofit corporations and faith-based organizations are eligible to apply for ESG funds. Organization need not be located within the City limits of Trenton. However, the beneficiaries or participants of the program must be Trenton residents.

Eligible activities for ESG funds will be divided into two categories: 1) Rapid Re-Housing for Individuals; and 2) Operations, and Essential Services for Emergency Shelters. The City awards the Rapid Re-Housing for Individuals Program (including Street Outreach) to one (1) agency. Multiple awards may be

made for Emergency Shelter projects.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Not applicable – there are formerly homeless people on the Board of the COC.

5. Describe performance standards for evaluating ESG.

All ESG activities are setup as programs in the CoC's HMIS system. The CoC's System Oversight Committee (which includes the City's CDBG Coordinator) meet monthly to review the accomplishments and challenges to the implementation of all CoC and ESG-funded activities. As necessary, representatives from the sponsors of troubled projects are invited to future meetings to help resolve issues.