

City of Trenton

Draft 2023 Annual Action Plan

July 1, 2023 – June 30, 2024



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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 (HUD) under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG) programs.

The primary federal funding resources in the City's 2020-2024 Consolidated Plan include:

- **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 recognizes the need to end homelessness through support of 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).

For the purpose of its Five-Year Strategic Plan, the City assumed its allocations each year over the five-year period would remain approximately the same and in line with the 2022 program year allocation. The Annual Action Plans submitted in each of the subsequent years would reflect actual allocation

amounts received. This FY 2023 Annual Action Plan represents the third year of the City's Consolidated Plan and associated Strategic Plan, which was submitted to HUD for FY 2020 through FY 2024. The City of Trenton anticipates receiving the following grant amounts in fiscal year 2023:

- CDBG: \$2,688,184
- HOME: \$995,689
- ESG: \$253,147

2. Summarize the objectives and outcomes identified in the Plan

For FY 2020-2024, The City of Trenton has identified the following goals and outcomes:

- Creation and preservation of affordable homeownership housing
- Blight removal
- Improve and expand public facilities to serve low-income populations
- Improve and expand infrastructure to serve low-income populations
- Enhance public services
- Provide housing and services to persons who are homeless
- Planning and Administration of programs.

3. Evaluation of past performance

The following evaluation of past performance is from the Program Year 2021 Consolidated Annual Performance and Evaluation (CAPER) Report. In 2021, the City of Trenton expended close to \$4.6 million in public facility, services, homeless prevention, and economic activities. The City is still operating under extenuating pandemic circumstances, which had great impacts on the goals set forth in the 2020 and 2021 Annual Action Plans. The City of Trenton reprioritized responding to new, as well as ongoing needs of the community. Throughout this CAPER, it is noted how both entitlement and CV funding has impacted programs.

The City of Trenton's Community Development Block Grant (CDBG) Program, HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) 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 its First-Time Homebuyer program and the Housing Rehabilitation Program. The City continues to fund its Senior Citizen Program operational needs. Several public facility-projects were stalled ~~due~~ due to the escalating project costs or are currently under construction.

In 2021, the City has either completed or is in the process of completing:

- Sam Naples Community Center – 100% complete
- West Ward Community Center Improvements
- South Broad Street Senior Center Improvements (2014 and 2019) – 100% complete
- Calhoun Street Pool Fencing– 100% complete

- Reading Senior Center Improvements (2014, 2015, 2016 and 2019) – 80% complete
- North Clinton Recreation Center (2014, 2015) – 95% complete

The City used prior year HOME funds to provide Tenant Based Rental Assistance to 66 households. The Jennings Village housing development creating 11 HOME assisted units was completed in FY 2021. Eight units were occupied as of July 1, 2022. A contractor was selected in 2020 and 19 properties were demolished in 2021 and 2022. Phase 2 of this housing project will include the demolition of 9 additional properties, projected to happen in 2022-2023.

4. Summary of citizen participation process and consultation process

Two hearings were held to encourage citizen input from residents of low- and moderate-income neighborhoods, public housing, assisted housing, and non-English speaking residents.

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 2023 AAP and conducted public hearings in a virtual way in accordance with its Citizen Participation Plan.

The City advertises all public meetings in the Trenton Times and the City's website. In addition to these publications, the City shares the availability of funding and meeting notices with the 1,500+ member CDBG email listserv.

The City implemented a collaborative planning process, involving a strategic 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 May 18, 2023, at 5:30 P.M., a public needs hearing on the FY 2023 Annual Action Plan was held to solicit input from social service agencies, housing providers, local municipalities, City agencies, and the public. A more in-depth orientation on CDBG eligibility, national objective, and rules was provided.

An advertisement in the newspaper was published as well as sent by direct mailing to all municipalities in the County providing notification of the meeting date on April 28, 2023, and the tentative schedule of other important program year dates. Each municipality was also asked to name a representative to the CDRS committee. An email was also sent to previous applicants and any organization who had expressed interest in applying for funding to notify them of the orientation meeting. County staff held one-on-one meetings with brand new applicants that had never applied before to discuss the process in more detail and review their potential application. Municipalities also referred interested organizations directly to the County.

The second public hearing notice was published in the newspaper on June 3, 2023. The draft document was also placed on display from June 3 – July 3, 2023, on the City of Trenton's web site: www.trentonnj.org/fedpublicnotices.

A second public hearing is scheduled to be held virtually on June 20, 2023. Information on the proposed projects for the 2023 Annual Action Plan will be provided to social service agencies, housing providers, local municipalities, City agencies, and the public.

The City Council is scheduled to approve submission of the Annual Action Plan at the July 6, 2023, meeting.

5. Summary of public comments

No comments received.

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

No comments received.

7. Summary

This plan outlines the goals of the City of Trenton for its CDBG, HOME, and ESG funds. Following outreach and public input, the 2023 Annual Action Plan clearly outlines programs and activities that will address the identified needs to maximize the investment of federal resources.

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator		TRENTON	Department of Housing and Economic Development
HOME Administrator		TRENTON	Department of Housing and Economic Development
ESG Administrator		TRENTON	Department of Housing and Economic Development

Table 1 – Responsible Agencies

Narrative (optional)

The Department of Recreation, Natural Resources and Culture is the lead agency responsible for overseeing the development of the Consolidated Plan and Annual Action Plans. The department is responsible for the overall administration of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG). The department will work closely with the Department of Health and Human Services and the CoC to administer the ESG programs. The department will work closely with the Department of Housing and Economic Development to administer HOME Investment Partnership programs and the Housing Rehabilitation programs.

Consolidated Plan Public Contact Information

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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. In addition, in early 2023, the City carried out extensive stakeholder participation as part of its preparation of the City's HOME ARP Allocation Plan. Information from those stakeholder sessions were included in this plan preparation.

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(l))

The City will implement this Action Plan in coordination with public, private, and non-profit agencies. Non-Profit agencies may include, but are not limited to, service providers and Community Housing Development Organizations (CHDO's). Private sector partners may include but are not limited to, local financial institutions, developers, and local businesses. The City works closely with its many partners to design programs that address identified needs. Table 2 outlines the types of agencies and organizations consulted throughout the program year and during the development of the City of Trenton Consolidated Plan and Annual Action Plan. Organizations consulted included various service providers, prospective CHDO's, Trenton Housing Authority, and the Trenton/Mercer Continuum of Care, and the various City of Trenton Departments, among others.

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 the co-applicant. 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 CoC since its inception. The City coordinated with the Trenton/Mercer Continuum of Care through its most recent PIT and Homeless Assessment reports and with residents through community meetings. The City attends

monthly Continuum of Care meetings and provides input and technical assistance on programs and policies. Through the public participation process the City conducted several meetings to gain input from the public. The CoC executive committee participated in the consultation for this plan. Invitations were sent to several agencies that provide services to the homeless population.

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 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 consulted with the lead agency for the CoC, THA, affordable housing providers and various social service providers. Additionally, the public, including but not limited to low-income residents and other entities impacted by housing and community development activities, were notified ~~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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Trenton DEPARTMENT OF HEALTH AND HUMAN SERVICES/COC
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	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
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Department HHS is the lead on the COC. Several member agencies attended the stakeholder meetings. The COC Executive Committee was consulted through this process. Consultation will result in better coordination between the grants programs.
2	Agency/Group/Organization	Trenton Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy PHA Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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 Neighborhood Planning Grant.

3	Agency/Group/Organization	City of Trenton
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless Services-Health Other government - Local Public Facilities Public Infrastructure
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Public facilities non housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	An interview was conducted with Public Works and Recreation Departments to discuss future CDBG resources and priority facilities projects. Various interviews and meetings with members of various City departments that use CDBG and ESG funds for various activities.

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. Because the City is the lead agency in CoC strategic plan process as well as its Annual Action Plan, goals are consistent.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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 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.
Workforce Innovation Opportunity Act Modification	Mercer County Workforce Development Board	This plan identified local needs and initiatives for employment
Broadband Part 1: Discussing the Technology	Delaware Valley Regional Planning Commission	This plan identified local needs and providers of broadband services.
Broadband Part 2: Understanding the Digital Divide	Delaware Valley Regional Planning Commission	This plan identified local needs and digital divide within the region.
Choice Neighborhood Planning Initiative	Trenton Housing Authority	Neighborhood transformation planning initiative through vital partnerships.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

The City provided many avenues and opportunities for agencies, stakeholders, and citizens to provide input on the application process and the types of programs desired to support the community and its residents. Through neighborhood meetings, agency workshops, the required public hearings, and the application process, the City recognized that the comments were consistent in supporting the goals determined by the prior Consolidated Plan process.

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. Since this waiver expired in 2023, the City carried out both in-person and virtual public meetings during the development of its 2023 AAP to solicit public comments. In accordance with the Citizen Participation Plan, accommodations were made available for persons with disabilities and LEP persons. Documents for public review were shared via the City's website.

The City has experienced a seventy five percent (75%) increase in citizen participation since offering virtual meetings. The City will continue to offer a virtual option for meetings.

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 2023 Action Plan, the City of Trenton held two public meetings. The meetings were advertised in the Trenton Times as display advertisements. A housing and community development needs meeting was held on May 18, 2023.

A second public hearing was held on June 20, 2023, to present a summary of the City's draft FY 2023 AAP, to present the City's proposed allocations of FY 2023 CDBG, HOME, and ESG funds, and to review the City's past program performance. City Council approved submission of the AAP at the July 6, 2023, meeting. The plan will be submitted to HUD on or by July 15, 2023.

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	Newspaper 05/16/23 06/20/23	Non-targeted/broad community	No attendance.	Public notice for public hearing did not result in any comments	Public notice for public hearing did not result in any comments	
2	Public Hearing #1: May 16, 2023	Non-targeted/broad community	First public hearing for the annual action plan.	No comments received.	No comments received.	
3	Public Hearing #2: June 20, 2023	Non-targeted/broad community	Second public hearing for the annual action plan.	No comments received.	No comments received.	
4	Newspaper Ad	Non-targeted/broad community	Newspaper ad was advertised June 3, 2023, in the Times of Trenton to advise the public of the FY2023 Action Plan and notification of the beginning of the 30-day public comment period.	N/A	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Trenton expects to receive the following funding amounts for its FY 2023 Program Year:

- CDBG: \$2,688,184.00
- HOME: \$995,689.00
- ESG: \$253,147.00

These funds will be combined with the available prior year CDBG and HOME funds. The FY 2023 funding awards were determined by the City Council to meet overall needs of the City and local and national objectives. Of the total available for 2023 activities exclusive of program administration, 100% of grant funds will be used for activities that benefit low/moderate income persons.

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	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$2,688,184.00	0	0	\$2,688,184.00	\$2,974,163	Funds for housing and non-housing community development needs.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$995,689.00	0	0	\$995,689.00	\$645,989	Funds for housing and non-housing community development needs.

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid Re-housing (rental assistance) Rental Assistance Services Transitional housing	\$253,147.00	0	0	\$253,147.00	\$243,943	Funds for housing and non-housing community development needs.

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 will look to leverage funds, if available, from State and Federal grant sources, City Departments (e.g., Public Works, Parks, and Recreation, etc.), public or social service providers, or other sources against CDBG, HOME, and ESG dollars. The City will 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.

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. All matching sources are verified prior to commitment of any federal funds. Specific matching requirements will be met as follows:

- HOME: The City of Trenton has a 100% match reduction due to Trenton's distressed status, however projects that leverage other funds will be rated more highly in the City's evaluation process.
- 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 THA has been awarded a Choice Neighborhood Planning Grant. CDBG funds are also leveraging the Choice Neighborhood Grant through funds allocated for housing rehabilitation, public infrastructure improvements and blight reduction.

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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 that are not suitable for rehabilitation are being demolished through the NJHMFA Demolition program, part of which is under the CDBG program to remove hazardous conditions and the creation of open spaces.

Discussion

No further discussion.

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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	Affordable Housing	2020	2024	Affordable Housing	CITY OF TRENTON RESIDENTS Choice Neighborhood North Trenton	Create and Maintain Affordable Housing	CDBG: \$600,000 HOME: \$896,121	Rental units constructed: 1 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted
2	Improve Public Facilities	2020	2024	Non-Housing Community Development	CITY OF TRENTON RESIDENTS Choice Neighborhood North Trenton	Improve Public Infrastructure Improve Public Facilities	CDBG: \$1,300,548	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 92400 Persons Assisted
3	Enhance Public Services	2020	2024	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Enhance Public Services	CDBG: \$250,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide Housing and Services To Persons Who Are Homeless	2020	2024	Homeless	CITY OF TRENTON RESIDENTS	Provide Homeless Housing and Services	ESG: \$234,161	Homeless Person Overnight Shelter: 1500 Persons Assisted Homelessness Prevention: 26 Persons Assisted
5	Planning and Administration	2020	2024	Planning and Administration	CITY OF TRENTON RESIDENTS Choice Neighborhood North Trenton	Planning and Administration	CDBG: \$537,636 HOME: \$99,568 ESG: \$18,986	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	Creation and preservation of affordable housing through use of HOME and CDBG funding.
2	Goal Name	Improve Public Facilities
	Goal Description	Improve public facilities serving low-income residents including parks, libraries, and social service agencies require capital improvements including handicap accessibility.

3	Goal Name	Enhance Public Services
	Goal Description	Expand and continue non-housing community development supportive services.
4	Goal Name	Provide Housing and Services To Persons Who Are Homeless
	Goal Description	Preservation of short- and long-term homeless facilities and housing including the provision of Tenant Based Rental Assistance (TBRA) to end homelessness. ESG funding includes Shelter and Homeless Prevention.
5	Goal Name	Planning and Administration
	Goal Description	Planning and administration of the CDBG, HOME, and ESG programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Trenton’s FY 2023 Annual Action Plan is based on 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.

Projects

#	Project Name
1	Senior Center Operations 2023
2	City Park Improvements 2023
3	Public Facility Improvements 2023
4	First Time Homebuyer Assistance
5	Housing Rehabilitation
6	ESG Homeless Activities 2023
7	HOME CHDO Set Aside
8	HOME Project
9	Administration 2023

Table 7 - Project Information

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

The primary obstacle to meeting underserved needs is limited resources to meet the competing demands. The City will continue to focus its CDBG funding on larger scale public facility and infrastructure projects to address timeliness concerns. The City provided funding for its Senior Center operations, housing rehabilitation, first-time homebuyers programs, park improvements, public facilities improvements, and homeless prevention activities in FY 2023.

The City gave priority funding to projects that:

- Met the Consolidated Five-Year Housing and Community Development Plan Strategic Goals
- Can begin immediately and finish within the contracted time
- Demonstrated capacity and the capability to carry out the project successfully
- 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.

The City of Trenton continues to have difficulty meeting timeliness. A CDBG Entitlement grantee, in accordance with the CDBG regulations at 24 CFR 570.902, must have a balance no greater than one and one-half (1.5) times its annual grant remaining in the Line of Credit, 60 days prior to the end of the program year. With several years allocation on hand, the City's balance is 3.61, more than twice the limit allowed by HUD. Until the Line of Credit is substantially reduced, the City will be in danger of HUD reducing FY2023 and subsequent grant allocations if the City remains untimely.

AP-38 Project Summary
Project Summary Information

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1	Project Name	Senior Center Operations 2023
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Enhance Public Services
	Needs Addressed	Enhance Public Services
	Funding	CDBG: \$250,000
	Description	Provide staffing and operations for senior centers in the City of Trenton.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 seniors will be served
	Location Description	Citywide
	Planned Activities	Operation expenses including staff salaries and fringe benefits.
2	Project Name	City Park Improvements 2023
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$300,000
	Description	The City's Recreation, Natural Resources and Culture Department will identify one or more parks and playgrounds that will be rehabilitated.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	84,000 households
	Location Description	Citywide
	Planned Activities	Rehabilitation of City parks and playgrounds.
3	Project Name	Public Facility Improvements 2023
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$1,000,548

	Description	Public Facility improvements may include rehabilitation to City-owned public facilities, including libraries, learning centers and community/recreation centers. This category also includes road and infrastructure such as roads, water/wastewater, sidewalks and curbing reconstruction or rehabilitation. A comprehensive list of improvements was created and will be used to select projects over the next several years.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 8,400 households will benefit
	Location Description	Citywide
	Planned Activities	Rehabilitation of public facilities and infrastructure.
4	Project Name	First Time Homebuyer Assistance
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	CDBG: \$200,000
	Description	Financial assistance is provided in the form of housing counseling, closing cost assistance and a matching down payment to qualified first time homebuyers. Financial assistance is based on the buyer 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	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	10-15 households
	Location Description	TBD
5	Planned Activities	Closing cost assistance, housing counseling, and matching down payment assisted to qualified first-time homebuyers.
	Project Name	Housing Rehabilitation
	Target Area	CITY OF TRENTON RESIDENTS

	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	CDBG: \$400,000
	Description	Rehabilitation of income qualified owner-occupied units Citywide. Rehabilitation includes both interior and exterior urgent improvements in accordance with program guidelines.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	50 housing units will be rehabilitated
	Location Description	TBD
	Planned Activities	Single-family rehabilitations
	Planned Activities	Single-family rehabilitations
6	Project Name	ESG Homeless Activities 2023
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Provide Housing and Services to Persons Who Are Homeless Planning and Administration
	Needs Addressed	Provide Homeless Housing and Services Planning and Administration
	Funding	ESG: \$234,161
	Description	Provide funding to homeless prevention activities and services related to assisting and or reducing homelessness: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, and (5) prevent families/individuals from becoming homeless. assistance for. The ESG program will provide assistance directly to those agencies associated with the helping the homeless persons living in the City including but not limited to: Emergency Shelters, Street Outreach, Homelessness Prevention, HMIS system support, and funding to City staff for administration of the ESG Program.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	1500 shelter nights provided: 14 families with homeless prevention assistance
	Location Description	Various
	Planned Activities	Emergency Shelter, Homeless Prevention, HMIS, Admin
7	Project Name	HOME CHDO Set Aside
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	HOME: \$149,353
	Description	A certified CHDO organization interested in purchasing and rehabilitating homes in the City for resale to low and moderate income buyers
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	1 low-income household
	Location Description	City of Trenton
8	Planned Activities	Single-family rehabilitations.
	Project Name	HOME Project
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	HOME: \$746,768
	Description	Development of new housing units and or substantial rehab of existing buildings to increase the number of affordable housing units.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 household will benefit.
	Location Description	City of Trenton

	Planned Activities	Housing development.
9	Project Name	Administration 2023
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$537,636 HOME: \$99,568 ESG: \$18,986
	Description	CDBG, HOME, and ESG program administration
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	CDBG, HOME, ESG program administration

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 several exceptions: small portions of Census Tracts: 9, 12, 17 and 22 and Census Tract 13.

The Consolidated Plan noted there are clear patterns of racial segregation throughout the City. Census tract data American Community Survey (2011-2015) shows evidence of minority concentration with respect to both the African American and Latino populations. In May 2022, CoC reports that single male Black/African Americans have ~~has~~ the most difficulty finding housing. 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
Choice Neighborhood North Trenton	59

Table 8 - 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 parks and infrastructure projects in low- and moderate-income neighborhoods.
- Coordinating and leveraging of resources.
- Responding to expressed neighborhood needs.

Most of the planned activities are non-site specific such as housing rehabilitation, affordable housing

development, homebuyers' assistance, public facility and park improvements, senior center assistance, accessibility projects, reducing homelessness City-wide.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Trenton will use HOME funds and a portion of CDBG funds for new affordable housing and to rehabilitate existing housing units. The special needs population will be served through the rehabilitation of existing homeowner housing. The homeless population will be served through Emergency Shelters, Street Outreach, and Homelessness Prevention. Homeowners will be assisted through the Homeowner Rehabilitation program and First Time Homebuyer Assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	26
Non-Homeless	21
Special-Needs	100
Total	147

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	14
The Production of New Units	1
Rehab of Existing Units	50
Acquisition of Existing Units	10
Total	75

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Rental Assistance is estimated to aid 14 households through the ESG Homeless Prevention Program.

The CHDO set aside will fund 1 new or substantially rehabilitated unit using HOME funds. As many as 50 housing units will be rehabbed through the City's Housing Rehabilitation Program over the next several years. ~~the first~~ The First Time Homebuyers program will assist 10-15 families acquiring a new home.

AP-60 Public Housing – 91.220(h)

Introduction

The Trenton Housing Authority builds and maintains safe, affordable, energy-efficient housing for residents in the City of Trenton. For more than 80 years, THA has provided thousands of Trenton households with affordable housing and the tools to help them become self-sufficient and improve their quality of life. The THA's 11 affordable housing developments serve 1,900 households and approximately 3,200 residents.

The mission of the THA is to provide decent, safe, and sanitary affordable housing that is well constructed, carefully maintained and expertly managed. THA seeks to identify projects that have the potential to act as a catalyst for the revitalization of neighborhoods in the City of Trenton. THA promotes self-sufficiency among the families that reside in our communities by partnering with local agencies and organizations to provide education, training, employment, and business opportunities.

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

THA will conduct an authority-wide portfolio analysis of its housing stock. THA will then develop plans to modernize and/or preserve its housing stock. THA will investigate all available sources of funding including local, state, and federal programs including Choice Neighborhood Grant, Moving to Work Demonstration Grant, Federal Home Loan Bank, and New Jersey LIHTC, CDBG, HOME and RAD programs. 30 units are targeted for modernization in 2023.

THA is following through in the disposition of 2 existing residential buildings (Frazier Court II) containing 30 units on 1.09 acres of land at Prospect Village. Frazier Court II has been rendered inhabitable since 2003. In its place, Project Based Rental Assistance (PBRA) will be developed constructing 24 larger two-bedroom units.

THA updated its 2021-2025 5-year and Annual Plan. The plan states its forthcoming implementation projects:

- Complete the redevelopment of one of its non-performing properties-Turner Pointe.
- Submit a RAD application to HUD to convert this property to Project Based Rental Assistance.
- Improve unit quality and living environment by installing durable flooring and cabinetry products, trash compactors, and landscaping.
- Implement the THA Section 3 Plan by partnering with several local supportive service organizations to provide education, recreation, and job training programs.
- Complete an assessment of site security and surveillance systems.
- Routine staff training in the areas of fair housing and equal opportunity.

THA is also involved in the establishment of a Choice Neighborhood program located in North Trenton.

This program is called the Donnelly Homes Target Neighborhood: North Trenton – Battle Monument and was awarded a \$1,300,000 Choice Neighborhood Planning Grant. The \$1,300,000 Choice Neighborhood Planning and Action Grant will bring together Trenton’s vast network of partners to co-develop a shared transformation plan that is rooted in the aspirations, culture, and history of the community. The process will be guided by the planning and design firm, Wallace Roberts and Todd; informed by Donnelly Homes residents and community leaders; and strongly supported by committed local partners.

Trenton Housing Authority (THA) and the City of Trenton are willing and ready to create an actionable plan to redevelop the distressed target housing development, Donnelly Homes. THA intends to draw from their successful experience of revitalizing dilapidated housing through the HOPE VI program, while the City seeks to seamlessly incorporate Donnelly Homes into their 20-year master plan for Trenton’s growth and development.

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

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 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.

The City of Trenton continues to work cooperatively with the Trenton Housing Authority. The Choice Neighborhood Planning Grant awarded provided residents of the targeted public housing development, Donnelly Homes in the North Trenton-Battle Monument neighborhood with an opportunity to become involved in the direction of planning efforts. The Choice Neighborhood team has been working with residents of Donnelly Homes in the North Trenton-Battle Monument community to craft a vision by choosing immediate and long-term projects to improve the overall quality of life within the project area.

THA also participates in the Family Self-Sufficiency Program (FSS). This program promotes independence, self-sufficiency and goal setting among THA residents. The program includes one-on-one counseling and referrals to supportive service providers. The mission of the program is to help THA residents set and achieve short- and long-term goals, one family at a time. Some of the goals set by residents include obtaining stable employment, budgeting and saving, achieving homeownership, purchase of transportation, pursuing vocational training or higher education, and much more.

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 as troubled.

Discussion

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

Introduction

The Trenton/Mercer CoC Program provides homeless assistance by leveraging funding needed through the Housing and Urban Development Consolidated Application; this provides collaboration between providers of housing and homeless assistance programs and other federal programs.

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 Coordinated Entry Assessment System (CEAS Center) operated by the City of Trenton Department of Health & Human Services is a key component in the Trenton/Mercer system to end homelessness. Through a coordinated entry process, homeless individuals (unsheltered or residing in an emergency shelter) are targeted, assessed, and prioritized for housing.

The CEAS Center collaborates with community partners to link literally homeless individuals (unaccompanied by children) and unaccompanied youth between the ages of 18 – 21 to housing and housing related services. The CEAS Center also serves as a site where community agencies can provide services and facilitate the journey from homelessness to 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; and 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. FY2023 ESG Funds have been allocated for shelter operations and essential services and homeless prevention.

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 CEAS System prioritizes the most vulnerable persons experiencing homelessness in the community by utilizing the prioritization policy established by the CoC. The goal is to move those designated with the highest priority to housing within 30 days. The CEAS 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 2021, 234 single households and 112 family households were placed into permanent housing. Of the single households permanently housed, 141 households were assisted through Rapid Rehousing. Most of the Rapid Rehousing households are adult Black/African American female households. Also, in 2021, 489 households were placed into permanent supportive housing.

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. This includes 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 an institutional setting into homelessness.

Since Foster Care in New Jersey is a statewide system, it is part of this statewide discharge policy. Specifically, the case worker works with the youth to identify available 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.

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.

Discussion

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

Introduction:

Affordable housing is defined by HUD as the lack of affordable housing available for rental or purchase to low- and moderate-income families in which the families pay no more than 30 percent of their income for total housing costs, including utilities. Income and the shortage of good quality affordable housing are barriers to homeownership in the City of Trenton.

Stakeholders during the 2023 AAP planning process noted an overall lack of desirable affordable housing in Trenton and difficulty in securing home improvement loans to make the required extensive repairs on a Trenton home and securing mortgages and homeownership insurance.

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

The City's strategies to remove barriers to affordable housing are outlined below:

- Assist with the implementation of the Housing and Neighborhood initiatives located within the City of Trenton Master Plan.
- Continue emphasis on neighborhood preservation of existing affordable housing stock.
- Work to build capacity of, and encourage partnerships with non-profit organizations and for-profit builders developing affordable housing development projects.
- Expand the use of subsidy programs by allocating more federal resources for affordable housing development and for programs that support residents remaining in their homes.
- Seek other grant resources to address the need for additional subsidies to help finance the cost of construction as building costs continue to rise.
- Finance public improvements to reduce the cost to build affordable housing.
- Work with lenders and housing counseling organizations to address mortgage products that can increase the production of affordable housing and reduce the number of foreclosure actions within the City of Trenton.
- Continue to coordinate internal systems in the areas of inspections, allocation of adequate financial resources for housing, plan review and zoning processes, disbursements and other identified areas that impact the delivery of affordable housing.
- Address any policy and/or procedural changes required to ensure that the City of Trenton incorporates energy efficiency standards into its building/rehab codes and all federally - funded projects.
- Support Housing Counseling and Homeownership programs.
- The City should also continue to encourage developers and community development

organizations to apply for Low-Income Housing Tax Credits (LIHTC) to increase the supply of housing for low-income families in Trenton.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

In 2023, 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

Despite efforts made by the City, stakeholders, and the non-profit organizations, significant obstacles to meeting the underserved needs exist. Staffing capacity issues remain as one of the greatest hurdles for the City of Trenton to meet the needs of its low-income residents. Lack of staffing lessens the ability to fund many worthwhile public service programs and activities. The City has worked to maximize the use of its limited resources through funding non-profit organizations to implement activities on the City's behalf to address the greatest needs and improve the quality of life for all its residents. Unfortunately, over the years this has become a highly criticized process, so the City has looked to fund other activities.

In 2020, the City received nearly a 700% increase in federal CDBG and ESG funds under the CARES Act. The increase in financial resources highlighted staff capacity issues. The City of Trenton will continue to collaborate with other departments and social service agencies to identify potential resources for meeting the service needs of City residents.

In 2023, the City is focusing heavily on improving public facilities through road reconstruction projects and housing rehabilitation. 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.

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.

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.

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

The City of Trenton has older housing stock compared to many other urban regions in the United States, thus the exposure of lead-based paint hazards poses a high risk. Lead was used as a pigment and drying agent in “alkyd” oil-based paint in most homes built before 1978. It can be present on any interior or exterior surface- particularly woodwork, doors, and windows.

The City’s homeownership and rehabilitation activities target low- to moderate-income households. The City will ensure that all federally funded housing programs and projects are in full compliance with the lead-based paint hazard regulations found in 24 CFR Part 35. This includes assisting households with the appropriate lead inspection, testing, and abatement of hazards, as required.

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 control 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.

Actions planned to reduce the number of poverty-level families

The City will seek to reduce the number of families that are below the poverty line. This will be done by pursuing the following strategies to reduce the number of poverty level families:

- Providing financial support to organizations offering necessary services such as food, senior services, and counseling programs for extremely low-income persons.
- Continued assistance to extremely low-income owner-occupied households with the improvement of their residences through the CDBG-funding housing rehabilitation.
- Providing homeownerships programs to support homeownership and the accumulation of equity.
- Lead-based paint abatement through community partners to address child lead poisoning, which can impact future employment and earning capabilities.
- Funding infrastructure improvements (streets, water mains, sidewalks, etc.) to enhance and beautify neighborhoods, thus increasing property values and raising residents’ pride in their community.
- Encouraging the introduction of economic development opportunities into distressed and impoverished areas.
- Providing financial support to organizations who provide referrals and assistance to special

needs persons.

- Continuing to fund agencies that provide financial counseling to allow residents to establish/repair credit, empowering those residents to gain a better financial future.
- Economic development programs aimed at developing job training and employability.
- Supporting youth and childcare programs, which provide mentoring and role models for children while helping parents secure employment.

Actions planned to develop institutional structure

The City will continue to recruit, train, and retain qualified staff to work with the CPD programs. In the interim, the City will supplement staffing with the assistance of consultants and non-profit service providers.

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 Recreation, Natural Resources and Culture is the lead agency responsible for administering the City's CDBG, ESG and HOME programs. The department will continue to partner with various City departments including, Department of Health and Human Services, the Department of Public Works and the Department of Housing and Economic Development to coordinate activities undertaken in the Action Plan.

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 within 30 days.

In addition, the City of Trenton, Office of Adult and Family Services provides several 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.

Discussion:

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(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

See Unique Appendix page 2

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.

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 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 using 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 a 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.

1. 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 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.
 2. For individuals unaccompanied by children, CoC has developed a Coordinated Entry and Assessment System (CEAS) 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 daytime 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).

The City of Trenton solicits applications for its ESG funding through a process that typically begins in November/December of each year. Nonprofit corporations and faith-based organizations are eligible to apply for ESG funds. Organizations need not be located within the City limits of Trenton. However, the beneficiaries or participants of the program must be Trenton residents. Applications are usually due in February, and a review/evaluation process begins then to assess organizational capacity, leveraging, application responsiveness, need addressed, matching funds, and leveraging resources and more. The CoC serves as the review committee and makes recommendations to the City of Trenton, who finalizes those recommendations, which are then forwarded to the Mayor. The Mayor considers input received and formalizes recommendations in the form of a resolution to the Trenton City Council. This approval authorizes entering contracts with each agency. Once contracts are executed, the organizations may begin implementing their respective programs.

It should be noted that the City decided to deviate from its normal ESG request for proposals while we focus our efforts on expending ESG-CV funding before the September 2023 deadline. A formal request for proposals will be published and awarded by September 2023.

Eligible activities for ESG funds will be divided into four (4) categories: 1) Homeless Prevention; 2) Emergency Shelters Operations and Essential Services; 3) Street Outreach; and 4) HMIS. Rapid Rehousing will continue to be funded through ESG-CV until funds are exhausted.

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.

