

**CITY OF TRENTON**

**2010**

**FIVE YEAR**

**CONSOLIDATED PLAN**

(COVERING THE PERIOD JULY 1, 2010 – JUNE 30, 2015)

REVISED 8/06/2010

A community planning and development document  
submitted to  
the U.S. Department of Housing and Urban Development

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# INTRODUCTION

The Consolidated Plan is a collaborative process whereby a community establishes a unified vision for community development actions. It offers local jurisdictions the opportunity to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level.

The Consolidated Plan approach is also the means to meet the submission requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) formula programs. This process replaces prior CPD planning and submission requirements with a single document that satisfies the submission requirements of the four CPD formula programs for local jurisdictions.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are:

DECENT HOUSING - - which includes:

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining the affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

A SUITABLE LIVING ENVIRONMENT - - which includes:

- improving the safety and livability of neighborhoods;
- eliminating blighting influences and the deterioration of property and facilities;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conserving energy resources and use of renewable energy sources.

EXPANDED ECONOMIC OPPORTUNITIES - - which includes:

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- the provision of public services concerned with employment;
- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

A complete consolidated plan contains information required by §91.200 through §91.230 submitted according to instructions prescribed by HUD (including tables and narratives), or in such other format as jointly agreed upon by HUD and the jurisdiction. The complete consolidated plan is due every three to five years no less than 45 days prior to the start of the grantee's program year start date. A summary of the citizen participation and consultation process, the action plan, and the certifications must be submitted on an annual basis. HUD does not accept plans between August 15 and November 15.

# CONSOLIDATED PLAN

**NAME OF JURISDICTION:** City of Trenton

**Consolidated Plan Time Period:** July 1, 2010 – June 30, 2015

## Executive Summary

An Executive Summary is required. The Summary must include the objectives and outcomes identified in the plan and an evaluation of past performance.

Goals and objectives make up the core of an organization's policies. Those policies should be based on documented goals and objectives which are established and published by the organization. Stated below are the priority objectives for the City of Trenton's Five Year Consolidated Plan. Each priority objective is required to meet one of the performance objectives which are described in the Introduction to this plan. The priority objectives are also keyed to outcomes which are explained in the table below the priority objective listing.

### A. PRIORITY HOUSING OBJECTIVES (Performance Objective and Outcome: DH-1\*)

1. Increase and support the creation and rehabilitation of affordable, quality homeownership opportunities as part of a comprehensive neighborhood stabilization effort.
2. Provide pre and post purchase counseling/Financial Literacy programs
3. Foster comprehensive neighborhood rebuilding and stabilization with broad resident participation, beyond bricks and mortar development.
4. Prevent and/or eliminate vacant properties that blight Trenton's neighborhoods through rehabilitation, brownfield remediation/adaptive reuse and strategic demolition (where rehab is not structurally or economically feasible).
5. Provide safe, affordable quality rental housing

### B. PRIORITY HOMELESS OBJECTIVES (Performance Objective and Outcome: DH-1\*)

Provide housing and appropriate supportive/essential services to individuals and families that are homeless or at-risk of homelessness, including the following activities: a) homeless prevention subsidies; b) payments to prevent foreclosures; c) housing placement; d) shelter assistance; e) emergency food; f) case management; g) health care services (excluding HIV/AIDS); h) mental health services; i) alcohol and drug abuse services; j) life skills; k) child care; l) education; and m) employment assistance.

### C. PRIORITY PUBLIC SERVICES OBJECTIVES (Performance Objective and Outcome: SL-1\*)

1. Expand and enhance out-of-school time programs for at-risk youth in the City of Trenton, in particular, by meeting gaps in services as identified below:
  - a. Supplement after school programming at one of the current SCOOP sites.
  - b. Enhance comprehensive programming to older teens (ages 13-18), which focus on leadership development, development of employability skills and or strategic thinking skills.
  - c. Continue programs serving the chess community in connection

- with the citywide chess program.
  - d. Coordinate and manage both the North Clinton Center and West Ward Center.
  - e. Provide programs targeted or designed for underserved populations (i.e., girls, children with special needs)
2. Support innovative or pilot programs and organizational capacity building for new/emerging agencies which addresses critical community needs in the City of Trenton.

**D. Priority Economic Development Objectives: (Performance Objective: EO\*)**

- 1. Stimulate increased economic development; attract new residents, visitors and businesses; and retain existing residents and businesses.
- 2. Develop a vibrant, diverse economy in Trenton, which will provide jobs, create tax revenue, and contribute directly to the commercial and industrial health of the city.

\*The table below defines Objective and Outcome codes used above.

| Objective                          | Outcome                           | Outcome              | Outcome               |
|------------------------------------|-----------------------------------|----------------------|-----------------------|
|                                    | <b>Availability/Accessibility</b> | <b>Affordability</b> | <b>Sustainability</b> |
| <b>Decent Housing</b>              | DH-1                              | DH-2                 | DH-3                  |
| <b>Suitable Living Environment</b> | SL-1                              | SL-2                 | SL-3                  |
| <b>Economic Opportunity</b>        | EO-1                              | EO-2                 | EO-3                  |

One way to summarize the City of Trenton's 2010 Five Year Plan is to describe how it differs from the City's 2005 Five Year Plan. The main differences between the current plan and the prior plan are as follows:

Public input on the development of the 2010 Five Year Plan was more extensive than in the past. This was accompanied through the utilization of a Community Development Needs Assessment survey that was conducted via phone, door and online outreach. The findings of that survey were incorporated into the plan. Details and results of the survey can be found in our response to question 5 of this document.

The 2010 Five Year Plan was generated with input from numerous staff members from the seven divisions at the City of Trenton that utilize CBDG funding. It also includes input from more than 300 individuals and organizations in the Trenton community.

In addition to community development objectives, this document includes an analysis and explanation of the City's affordable housing policies. Such policies are required as part of the Housing Element of the City of Trenton Master Plan. The Trenton Housing Authority commissioned a market study in 2009 as part of its HOPE 6 application. The goal of the study was to determine the demand and absorption rate of the proposed HOPE VI development. The study examined the affordable and market rate housing markets within a three mile competitive market area (the entire city). This study reports that the total housing stock in the City increased from 33,908 units in 2000 to 34,909 units in 2009 (+3%) and projects an increase to 35,699 units by 2014 (+ 2.3%). Well managed affordable housing developments were usually occupied upon completion or within weeks of completion. Market rate

homes were found to require more time before occupancy with an absorption rate of 1-2 units +/- per month. For homeownership, the study found that their data supports a homeownership sales market in the \$150,000 to \$175,000 +/- price range. However, the report notes that a more meaningful gauge of future homeownership sales price will be dependent upon the income requirements of the individual buyers. The study also found that turnover rates varied between market rate and subsidized housing, with age, condition and competency of management also affecting turnover rates. Market rate housing was found to have a turnover rate of approximately 20%-35% with newer subsidized housing experiencing a rate of only 5%-15%.

## MANAGING THE PROCESS

### Consultation 91.200(b)

1. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

Within the Trenton city administration, the Division of Planning, in the Department of Housing and Economic Development has been the lead agency for developing this Consolidated Plan. The Division of Housing Production will take on the lead role in the Consolidated Plan over the next five years.

Attachment A is an organizational chart which shows the CDBG, ESG and HOME programs and illustrates the relationship between staff and program responsibilities.

The process of developing the plan included gathering input from citizens and organizations that operate in Trenton. Attachment B is the City's 2010 Citizen Participation Plan which describes the process used for receiving input.

The City has good working relationships with federal, state and county entities, supportive service providers, non- and for-profit developers, and various financial institutions and used these relationships to develop the Five Year Consolidated Plan.

2. Identify agencies, groups, and organizations that participated in the process. This should reflect consultation requirements regarding the following:
  - **General** §91.100 (a)(1) - Consult with public and private agencies that provide health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during the preparation of the plan.
  - **Homeless strategy** §91.100 (a)(2) – Consult with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless.

- **Lead lead-based paint hazards §91.100 (a) (3)** – Consult with State or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings.
- **Adjacent governments §91.100 (a)(4)** -- Notify adjacent governments regarding priority non-housing community development needs.
- **Metropolitan planning §91.100 (a)(5)** -- Consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction, i.e. transportation, workforce, etc.
- **HOPWA §91.100 (b)** -- Largest city in EMSA consult broadly to develop metropolitan-wide strategy for addressing needs of persons with HIV/AIDS and their families.
- **Public housing §91.100 (c)** -- Consult with the local public housing agency concerning public housing needs, planned programs, and activities.
- The following public agencies, which provide health services, social and fair housing services, participated in the development of Trenton's 2010 Five Year Consolidated Plan: Trenton Department of Health and Human Services, Trenton Department of Housing and Economic Development, and Trenton Department of Recreation, Natural Resources and Culture.
- The following private agencies, which provide assisted housing, health services, and social services, participated in the development of Trenton's 2010 Five Year Consolidated Plan: Homefront, Inc, Rescue Mission, Puerto Rican Community Day Care, Mercer Street Friends, Catholic Charities and Mercer Alliance to End Homelessness.
- Participation from the public and private agencies identified above helped determine the resources that are available and needed to address the needs of chronically homeless persons. The City of Trenton Department of Health and Human Services, which is responsible for overseeing the Homeless strategy, provided the most critical information in this area.
- Staff from the department of Housing and Economic Development and Isles, a local community development corporation, who deal with data related to lead-based paint hazards and poisonings, also contributed to this plan.
- The public housing agency, Trenton Housing Authority, was closely involved in the development of this plan.
- The townships of Ewing, Lawrence and Hamilton, which are adjacent to Trenton, were notified of the development of the plan. Staff at Mercer County were also notified via email.

### **Citizen Participation 91.200 (b)**

3. Based on the jurisdiction's current citizen participation plan, provide a



summary of the citizen participation process used in the development of the consolidated plan. Include a description of actions taken to encourage participation of all its residents, including the following:

- low- and moderate-income residents where housing and community development funds may be spent;
- minorities and non-English speaking persons, as well as persons with disabilities;
- local and regional institutions and other organizations (including businesses, developers, community and faith-based organizations);
- residents of public and assisted housing developments and recipients of tenant- based assistance;
- residents of targeted revitalization areas.

In addition to the general public notification of the Draft Citizen Participation Plan and 2010 Consolidated Plan, the city undertook a variety of actions to increase awareness of the resources available in the 2010 Consolidated Plan-particularly towards minorities and non-English-speaking persons, as well as persons with disabilities. These actions included:

· Non-profit organizations that are serving low and moderate income residents were contacted and requested to alert their groups about the development of the Five Year Consolidated Plan;

· A survey of low and moderate income residents and the community development groups serving them was conducted. The survey alerted these individuals about the consolidated plan, how the funds had been used and solicited feedback on how to improve use of these funds; The survey was placed on the City of Trenton's website and distributed in hard-copy form to various groups around the city.

· A public meeting was convened to explain the consolidated plan and receive feedback and comments from the public;

· Outreach to non-English speaking individuals was done through organizations established to serve those populations (El Centro, MECHA, etc.) as well as through survey distribution in those neighborhoods (e.g., Polish neighborhood);

· We also reached out to Enable, Inc. the primary agency servicing the disabled population and provided them information about public hearing and draft consolidated plan;

· The City of Trenton has a database of more than 200 regional institutions including businesses, developers, community and faith based organizations. These organizations received two notifications about the plan and the public hearing-first via e-mail and followed up with a letter from the Mayor;

· The Department of Housing and Economic Development staff worked through the Trenton Housing Authority (THA) to notify THA residents of this plan. The Department of Housing and Economic Development staff reached out to the

operators of assisted ---- developments as well as the recipients of tenant-based assistance; and

· There was no special outreach devoted towards residents in targeted revitalization areas as the city does not have any targeted revitalization areas.

4. Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30 day citizen comment period, and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.

Attachment B is the City's 2010 Citizen Participation Plan, which describes the process used to allow citizens to review and submit comments on the proposed consolidated plan. A public hearing on the Draft Citizen Participation Plan was held in conjunction with a public hearing on the Five Year Consolidated Plan per the schedule described below: Citizen participation efforts for the 2010 Consolidated Plan included two advertised public hearings. Numerous organizations were represented at a public meeting held on the preparation of the Consolidated Plan at 5:30 p.m. on January 11, 2010. The second hearing on the Draft Five Year Consolidated Plan was held at noon on April 9, 2010. Prior to this meeting, the City published a summary of the draft Consolidated Plan in the local newspaper and on the City's website. Copies of the draft plan were made available upon request. A revised summary was advertised on July 13, 2010. (See Attachment C.) The thirty-day public review period for the draft Plan ends on August 13, 2010.

In order to increase the degree of public input into the development of the Consolidated Plan, a comprehensive survey of a representative sample of both residents and service providers in the City of Trenton was created. The survey was distributed with the intent to encourage participation by residents of predominantly low- and moderate-income neighborhoods. A summary of the survey analysis is provided in the response to question 5 below.

5. Provide a summary of citizen comments or views received on the plan and explain any comments not accepted and reasons why these comments were not accepted.

Over a six week period, 326 residents of the City of Trenton took part in the Community Development Needs Assessment Survey. Approximately 65% of the respondents were renters and the remaining were homeowners. Overall there was a good demographic mix with a majority of the respondents of Latino origin (63%). The majority of the survey respondents were employed.

Overall, this survey has assisted the City of Trenton in identifying what the community believes is the greatest service need and how the community would like CDBG funds to be allocated. The survey also provides a good baseline for understanding other areas of interest among residents. In summary:

- 76.4% of the respondents were renters in the City of Trenton. This points to the continued expansion of the renter community in the city and speaks to our goal of attracting more homeownership.
- A majority of the respondents' have children who attend public schools in the City of Trenton (85.0%)
- The top three areas that respondents reported would benefit their households were computer training programs, financial management classes and youth and job training.
- The overwhelming majority of respondents stated that there was a great need for more tutoring programs in the City of Trenton (88.9%)

Our analysis also included feedback from nonprofit service providers in the City of Trenton. The results of their feedback are incorporated in the summary. Listed below are what we believe to be the most important findings.

### Public Facilities Needs

- Parks and Recreational Facilities ranked as being of the highest importance (79.6%) among the respondents. The other facilities scored very high in the survey as well, which underscores the dependency of City residents on City run facilities to meet their recreational and service needs.

| Highest Unmet Needs      |                                      | Percentage |
|--------------------------|--------------------------------------|------------|
| 1 <sup>st</sup> Priority | Park Recreational Facilities         | 79.6%      |
| 2 <sup>nd</sup> Priority | Abused/Neglected Children Facilities | 76.3%      |
| 3 <sup>rd</sup> Priority | Youth Center Facilities              | 75.5%      |
| 4 <sup>th</sup> Priority | Neighborhood Facilities              | 75.2%      |

### a. Infrastructure Improvement Needs

Of all the categories in the survey, the infrastructure improvement needs scored the highest (83.6%). The other areas within this subset (for flood, drainage, water, street, sidewalk and tree plantings) also ranked high on the survey.

| Highest Unmet Needs      |                                 | Percentage |
|--------------------------|---------------------------------|------------|
| 1 <sup>st</sup> Priority | Street Improvements             | 83.6%      |
| 2 <sup>nd</sup> Priority | Sidewalks                       | 83.0%      |
| 3 <sup>rd</sup> Priority | Tree Planting                   | 81.6%      |
| 4 <sup>th</sup> Priority | Flood and Drainage Improvements | 77.6%      |

### b. Removal of Architectural Barrier Needs

This category was not considered by the respondents as being one of greatest unmet needs. That may be due, in part, to the fact that the existing infrastructure needs substantially outweigh this category.

### c. Public Services Needs

Public Service Needs is a broad category and the identified areas of need are diverse. Resident feedback in this category was diverse, but by far the largest number of responses was in the area of neighborhood clean-up, followed by employment training, health services and services for abused and neglected children.

**d. Housing Needs**

This was one of the most interesting categories in the survey as it reflects a key trend that has developed in housing over the last five years, the inclusion of energy efficiency in the area of housing. The greatest number of respondents (77.8%) identified energy efficiency as being the most critical unmet need.

| Highest Unmet Needs      |                                | Percentage |
|--------------------------|--------------------------------|------------|
| 1 <sup>st</sup> Priority | Energy Efficiency Improvements | 77.8%      |
| 2 <sup>nd</sup> Priority | Rehabilitation: Multi Family   | 76.2%      |
| 3 <sup>rd</sup> Priority | Homeownership Assistance       | 75.7%      |
| 4 <sup>th</sup> Priority | Lead Hazard Abatement          | 74.4%      |

**e. Economic Development Needs**

This area generated very high responses in each category. The highest support of allocating resources was in the areas of Job Creation/Retention (80.6%) and Business Technical Assistance (76.1%).

**f. Other Needs**

The three categories under this category are; clearance and demolition, clean-up of contaminated sites and code enforcement. Surprisingly, none of these areas received strong prioritization from the sample of residents surveyed. It should be noted in another survey for the CARE grant, vacant city properties were identified by residents as being the most hazardous condition to the City and its residents.

**g. Main Categories Prioritization**

In the final section of the survey the residents indicated that they were most concerned with the level of resources available to support economic development needs for the City of Trenton. The areas that received the greatest support focus on job training and business development. This is consistent with the feedback from the rest of the survey.

**Methodology**

The findings of this survey are based on individual and service provider responses to a questionnaire conducted in phone, door and online outreach effort. The survey was offered in both English and Spanish. The City of Trenton utilized the Survey Monkey software for analysis.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

## HOUSING AND HOMELESS NEEDS

### Housing Needs 91.205

*\*If not using the CPMP Tool:* Complete and submit CHAS Table from:  
<http://socds.huduser.org/scripts/odbic.exe/chas/index.htm>

*\*If using the CPMP Tool:* Complete and submit the Needs/Housing Table

The CHAS Table can be found in Attachment D.

6. In this narrative, describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families) and substandard conditions being experienced by extremely low-income, low-income, moderate-income, and middle-income renters and owners compare to the jurisdiction as a whole. The jurisdiction must define the terms "standard condition" and "substandard condition but suitable for rehabilitation."

Trenton defines a housing unit as "substandard, but suitable for rehabilitation" when that unit lacks complete plumbing and/or kitchen facilities. (This is also the U.S. Census definition.) A standard housing unit is a unit that satisfies the housing code. In contrast, substandard housing meets a minimum standard of habitability. When a unit is deemed incapable of rehabilitation, it is placed on the City's demolition list. Currently, 125 units are slated for demolition because they are inhabitable and substandard.

The following analysis of the estimated housing needs projected for the next five years for various categories of households is based on the 2000 U.S. Census data which includes special tabulations of 2000 Census source information provided in the Comprehensive Housing Affordability Strategy (CHAS), which is submitted in the Tables section of this document.

The Department of Housing and Urban Development (HUD) defines low- to moderate-income (LMI) households as households with an income below 80% of the County median income. Within that category, there are three income levels as follows:

\* Extremely low-income households, which are households with an annual income below 30% of the MSA median income.

\* Low-income households, which are households with an annual income between 30-50% of the MSA median income.

\* Moderate-income households, which are households with an annual income between 50-80% of the MSA median income

**2010 HOME PROGRAM INCOME LIMITS AS A PERCENTAGE OF AREA MEDIAN INCOME (in dollars)**

**Mercer County, New Jersey**

| <b>FY 2010 Income Limit Area</b> | <b>Median Income</b> | <b>FY 2010 Income Limit Category</b>     | <b>1 Person</b> | <b>2 Person</b> | <b>3 Person</b> | <b>4 Person</b> | <b>5 Person</b> | <b>6 Person</b> | <b>7 Person</b> | <b>8 Person</b> |
|----------------------------------|----------------------|--|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
|                                  |                      | <b>Very Low (50%) Income Limits</b>      | \$32,000        | \$36,550        | \$41,100        | <b>\$45,650</b> | \$49,350        | \$53,000        | \$56,650        | \$60,300        |
| <b>Mercer County</b>             | \$91,300             | <b>Extremely Low (30%) Income Limits</b> | \$19,200        | \$21,950        | \$24,700        | <b>\$27,400</b> | \$29,600        | \$31,800        | \$34,000        | \$36,200        |
|                                  |                      | <b>Low (80%) Income Limits</b>           | \$45,100        | \$51,550        | \$58,000        | <b>\$64,400</b> | \$69,600        | \$74,750        | \$79,900        | \$85,050        |

The CHAS Housing Needs Table includes three income categories (extremely low-, low-, and moderate-income), five household types ("Large family", "Non-family Household, Elderly", "Non-family Household, Not Elderly", "Small Family, Elderly", and "Small Family, Not Elderly Households"), and two tenure types ("renter" and "owner").

The CHAS Housing Needs Table also identifies three categories of housing problems for both renters and homeowners. They include: paying more than 30-50% of income for housing costs (cost burden), paying more than 50% of income for housing costs (severe cost burden), and experiencing one or more of any type of housing problems, including cost burden, severe cost burden, overcrowding, and/or substandard housing (incomplete kitchens or plumbing facilities).

**Housing Needs Information by Household Type Categories**

*Cost burden*

When a household must pay more than 30% of monthly income for housing costs (rent plus utilities for renters, and mortgage, real estate taxes and insurance for owners), the household is said to have a housing cost burden.

*Severe cost burden*

The incidence of severe cost burden (more than 50% of income for housing costs) is concentrated in the extremely low-income category of households. 66% of the owner households in the 0-30% MFI are severely cost burdened and 30% of 30-50% MFI household categories are experiencing severe cost burden. As household incomes increase, the incidence of severe cost burden generally declines. Only 1% of owner households making 80% of MFI and above are severely cost burdened and 6% are cost burdened. Similarly, 3% of renters making 80% of MFI are cost burdened and there are no numbers reported for severe cost burden.

*Extremely low-income families (incomes between 0% and 30% of median family income (FMI), adjusted for household size),*

The Housing Needs Table identifies 4,576 renter households and 3,727 owner households with incomes less than or equal to 30% of MFI. Of the extremely low-income renters, 79% are cost burdened and 50% experience severe cost-burden. Of the extremely low income owners, 93% have one or more housing problems, 93% are cost burdened and 66% experience severe cost burden.

*Low-income families (incomes between 30% and 50% of MFI)*

The Housing Needs Table identifies 2,196 renter households and 1,795 owner households with incomes in a range between 30% and 50% of MFI. Of the low-income renters, 61% have one or more housing problems, 61% are cost burdened and 25% experience severe cost-burden. Of the low-income owners, 60% have one or more housing problems, 60% are cost burdened and 30% experience severe cost burden.

*Moderate-income families (incomes between 50% and 80% of MFI)*

The Housing Needs Table identifies 2,297 renter households and 1,878 owner households with incomes in a range between 50% and 80% of MFI. Of the moderate-income renters, 25% have one or more housing problems, 25% are cost burdened and 2% experience severe cost-burden. Of the moderate income owners, 25% have one or more housing problems, 25% are cost burdened and 4% experience severe cost burden.

*Renter households*

The CHAS Data indicates that there are 14,261 renter households at all income levels. Of these, renter households with incomes in a range between 0% and 30% of MFI 22% are cost burdened and 57% are severely cost burdened. Of the renter households with incomes 30-50% of MFI 37% are cost burdened and 25% are severely cost burdened and .5% live in substandard housing. Of the renter households with incomes 50-80% of MFI 23% are cost burdened and 2% are severely cost burdened.

*Owner Households*

The CHAS Data indicates that there are 13,099 owner households at all income levels. Of these, 66% of owners with an income of 0-30% of MFI were severely cost burdened and 27% were cost burdened. Of the owner households making 30-50% of MFI, 30% were cost burdened and 30% were severely cost burdened. Of the households making 50-80% of MFI, 21% were cost burdened and 4% were severely cost burdened.

Poverty is closely correlated with housing cost burden. As such, groups that are low-income can be expected to have high housing needs. Poverty levels for the following groups are provided as a indication of housing need. (We were not able to determine housing needs for these groups. However, we are providing figures from the 2000 Census as a rough indication of the magnitude of the housing needs that may exist.)

|   | <i>Population</i> | <i>% in poverty</i> |
|---|-------------------|---------------------|
| <i>Elderly (age 65 and over)</i>                        | <i>9,716</i>      | <i>19.5%</i>        |
| <i>Persons with disabilities - age 5 to 20 year old</i> | <i>2,371</i>      |                     |
| <i>Persons with disabilities - age 21 to 64</i>         | <i>13,170</i>     |                     |

|  |                                   |  |
|--|-----------------------------------|--|
| Persons with disabilities – age 65 and over  | 4,658                             |  |
| Persons with HIV/AIDS<br>(Source: NJ Department of HHS website, as of June 30, 2009)       | 1,994                             |  |
| Large families   | 4,056                             |  |
| Victims of domestic violence<br>(Source: The Trenton Police Department estimates for 2009) | 1,800 to 1,900 including children |  |

**Housing Needs Information by Specific Housing Problem Categories**

*Substandard housing and overcrowding (especially large families)*

The Housing Needs Table provides statistics for a factor labeled, “any housing problems”. That factor includes the incidence of overcrowding (more than 1.01 persons per room) and substandard housing (defined as incomplete kitchen or plumbing facilities).

According to the 2000 Census, 51% of all residential structures (33,908) in the city were built prior to 1939. 32,061 (95%) of all residential structures were built prior to 1980. This figure provides an estimate of the number of housing units that may have lead-based paint. Although lead based paint is not necessarily an indicator of substandard housing conditions, more often than not, the paint chips and flakes in older homes and this poses a serious health hazard especially for children.

Substandard housing conditions are integrally linked to poverty and a lack of disposable income. The constant flow of applications and requests for home improvement loans to address deficiencies essential to safe and healthy living make it clear that the needs are substantial. According to the 2000 Census, 661 or 1.9% of the total housing stock is substandard. This includes .8% of Trenton’s rental housing stock and 1.1% of the owner-occupied stock. Additionally, the City of Trenton assists about 60 seniors every year with home improvement grant and loans and each year about 300 applicants are waitlisted

Residential overcrowding has long been identified as an important housing policy issue because it is deleterious to people’s physical and mental health. Overcrowding is a highly complex problem, involving household structure, racial and ethnic diversity, housing availability, and consumer preferences. An analysis of Census data shows that of 16,054 total renter-occupied units in Trenton, 2,047 or 12% are overcrowded. Of the 13,401 owner-occupied units in Trnton, 472, or 3% are overcrowded.

- To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must provide an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

*Extremely low-income families (incomes between 0% and 30% of MFI)*



Among renters at the extremely low-income level, no households have a disproportionate housing need when compared to the needs of all the renter households with incomes at or below 30% of MFI. Among owners in the same income category, no racial and ethnic groups have a disproportionate housing need.

*Low-income families (incomes between 30% and 50% of MFI)*

Among renters at the low-income level, only 60% of households have a disproportionate housing need when compared to the needs of all the renter households with incomes between 30% and 50% of MFI. Among homeowners in the same income category, 25% of households have a disproportionate housing need.

*Moderate-income families (incomes between 50% and 80% of MFI)*

Among renters at the moderate-income level, no households have a disproportionate housing need when compared to the needs of all renter households with incomes between 50% and 80% of MFI. Among homeowners in the same income category, 25% of households have a disproportionate housing need.

## **Homeless Needs 91.205 (c)**

\*Refer to the Homeless Needs Table 1A or the CPMP Tool's Needs.xls workbook

8. Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered.

The needs of homeless individuals and families in Trenton are characterized by a high incidence of unemployment, mental illness, substance abuse, substandard housing conditions and high cost burden among low-income renter house. In addition to these factors, Trenton, like other areas, has been affected by an increase in the national unemployment rate. High unemployment has played a major role in increased homelessness in the Trenton area. In addition, the shortage of affordable housing for Trenton's very low-income individuals and families on public assistance prevents people from leaving homeless shelters once homelessness occurs. Very low-income individuals and families often wait years to receive Section 8 voucher or public housing placement. (Based on data from the Homeless Management Information System (HMIS), there were 165 or 20% homeless individuals & families collecting Unemployment Benefits, there were 11 or 1.3% receiving General Public Assistance and 216 or 26.2% looking for work. This data is based on the number of consumers in the program on 7/20/10...Total count 824. The City of Trenton has a great need for additional beds for homeless families provided in a supportive environment. The U.S. Conference of Mayors 2009 Status report on Hunger & Homelessness for the City of Trenton reported that there are 1,036 single adults, 205 families and 20 youth living in emergency shelters for a

total of 1,261 persons. There were 262 single adults and 85 families living in transitional housing for a total of 347 people.

To an extent, all homeless person have special needs, however, Trenton's homeless population is comprised of several sub-groups that complicate the delivery of adequate services to all those in need. Some of these sub-group include; homeless youth, including parenting and /or pregnant teens; recently de-institutionalized persons from the state psychiatric hospital and from the state prison; families and individuals with addiction problems and/ or mental illness; AIDS infected individuals and families; and individuals and /or families with children whose breadwinner/ caretaker has recently become unemployed or ill or incarcerated and are unable to make rental payments as well as growing number of Kinship families. Other social factors such as limited education skills, physical and mental disabilities, and domestic violence can also lead to homelessness.

### 1. Homeless Youth

According to the Homeless Management Information System (HMIS), as of 7/20/10, there were approximately 923 homeless youth in the City of Trenton. This represents a substantial number of youth in Trenton who are in need of supportive shelter and services. Many of these youth are victims of broken families as a result of their parent's incarceration, drug and alcohol abuse, domestic violence, illness or unemployment. Approximately 206 of these children are attending school.

### 2. Homeless Individuals and families with Mental Illness and/ or Alcohol/Drug Addiction

The leading cause of homelessness in Trenton is unemployment or loss of income as a result of mental illness or substance or a combination of the two. Of homeless single individuals who are sheltered at the Rescue Mission and who regularly received assistance, it is estimated that 65-70% are in need of treatment for both drug or alcohol abuse and mental health issues, while approximately 25% are in need of treatment for just mental illness.

Based on data from HMIS, 821 people were homeless on 7/20/10. 702 of these people were looking for shelter or housing and 11 people were identified as substance abusers. Substance abuse rehabilitation programs, including both in-patient and out-patient services, are needed in the City. Despite the construction of some 160 units over the past few years, there is still a need for supportive transitional and affordable permanent housing options for recovering substance abusers. In 2009-10, The City of Trenton added approximately 20 to 25 new permanent housing beds for the mentally ill population. In 2010-11, The Rescue Mission will develop 12 new units of Permanent Supportive Housing. The project will target homeless single men, substance users and individuals with a co-occurring condition.

### 3. AIDS/HIV INFECTED/Other illness

The term prevalence is used to describe the number of people living with HIV infection at the end of a given year. According to data from HMIS, the 2009 Mercer County prevalence rate is 347.8 per 100,000 people. The CDC lists the US national prevalence rate in 2008 as 447.8 per 100,000. The prevalence rate for Trenton in 2009 is 1,317 per 83,242. Out of a total of 1,614 cases in Mercer County, Trenton has 1,317 cases. The number of HIV cases are 464 in Mercer County; out of this number, Trenton has 380 cases.

The number of AIDS cases in Mercer County is 1,150; of which, Trenton has 937 cases. Although New Jersey is in the top ten in the US in recent HIV/AIDS diagnosis, undoubtedly, a disproportionate number of City residents suffer from HIV/AIDS compared to both the State and national number and the incidence rate for HIV/AIDS is extremely high in the city.

There is a need for special homeless facilities for people who have AIDS, are HIV-infected, or other communicable illnesses. Those individuals who are infected by AIDS have a great need for hospice care in a group home setting, especially in the illness' later stages. The City of Trenton/Mercer County plans to continue to collaborate with local non-profit sponsors to provide additional permanent housing for HIV/AIDS homeless people in 2009-10.

#### 4. Persons Threatened with Homelessness

##### (a) Extremely Low-income households

The main populations at risk of homelessness are extremely low-income households, especially those households who are or have been dependent on public assistance of some kind and who do not live in some form of subsidized housing. Many of these families experience severe housing cost burdens and could become homeless under a number of adverse situations. As an illustration of the tremendous size of this at-risk population, it should be noted that the 2000 Census data indicated that 46% or 2,352 very low-income households suffered from severe housing cost burden. The City estimates that it needs approximately 300 additional units of supportive housing for very low-income single adults.

##### (b) Mentally Ill and/or Addicted population

Another population at risk of homelessness is the mentally ill population, many of whom may have recently been deinstitutionalized. The problem is compounded by the fact that many or some mentally ill individuals also have substance abuse problems. The Greater Trenton Behavioral HealthCare Center indicated that a large proportion of its 2,000 clients, many of whom live in Trenton, are at risk of becoming homeless. About 25% of those are considered at risk of homelessness. Of this high risk group, approximately 80% suffer from substance abuse problems and mental illness.

##### Priority Homeless Needs

The City of Trenton received a direct allocation of Homeless Prevention and Rapid Re-housing Program (HPRP) funds through the 2009 federal stimulus program. These funds were leveraged with existing funds from the State of NJ, Division of Family Development's Social Services for the Homeless (SSH) as well as the American Recovery & Re-investment Act (ARRA) funds for families enrolled in the Temporary Assistance for Needy Families (TANF) program. This initiative began on October 1, 2009, and is being coordinated with the Continuum of Care (CoC)-funded Rapid Re-housing initiative that was submitted last year. The City of Trenton, as the CoC's lead entity, was successful in forging a dynamic and creative partnership between the County and the City. The CoC works directly with the entitlement communities on Neighborhood Stabilization Program. This includes prioritizing both sites and populations involve in the NSP program. The CoC coordinates all funds to serve the homeless and at risk populations through the America Recovery and Reinvest Act of 2009; including the Board of Social Services and One Stop Career Centers. In addition, all members of the CoC will also be expected to

closely collaborate with each other. The CoC will work with both the entitlement communities and Board of Social Services to determine if any additional connections can be made to other funds provided by the American Recovery and Reinvestment Act.

It is our goal to assist 560 people over the next three years to keep them from becoming homeless, allow them to stay in their homes, and/or to find housing as quickly as possible.

Addressing housing for the sheltered and unsheltered:

The Mercer Alliance to End Homelessness, the group that developed the Ten Year Plan to End Homelessness, reports the following counts of unsheltered homeless people:

| <u>Year</u> | <u>Count</u> |
|-------------|--------------|
| 2008        | 97           |
| 2009        | 35           |
| 2010        | 59           |

The City of Trenton/Mercer CoC is working in collaboration with the Mercer Alliance to End Homelessness to make homes available as rapidly as possible for those with high and moderate service needs, prioritize housing vouchers for people with high and moderate barriers, ensure an inventory of safe affordable apartments in the rental market, rehabilitate existing buildings to create rental homes, and include a percentage of homes for formerly homeless tenants in affordable housing projects in all our municipalities.

As a consequence of this strategy, we have seen a decrease in the count of unsheltered homeless by 39% since 2008. As vouchers for permanent housing become available, we request applications from people living on the streets and from institutions serving the long-term homeless, such as The Rescue Mission and the Trenton Area Soup Kitchen. Outreach to these individuals is followed by enrollment in Housing First and a move, as soon as possible, to an apartment of the individual's choice.

9. Describe, to the extent information is available, the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

Table 1B contains data on Trenton's Special Needs (non-homeless) populations. Trenton does not maintain data on the at-risk homeless population, however, a definition of the at-risk group is provided:

1. The family has income 30 percent of median income for the geographic area
2. Has insufficient resources immediately available to attain housing stability
3. Has moved frequently because of economic reasons
4. Is living in the home of another because of economic hardship
5. Has been notified that their right to occupy their current housing or living situation will be terminated
6. Lives in hotel or motel

- 7. Lives in severely overcrowded housing
- 8. Is exiting an institution or otherwise living in housing that has characteristics associated with instability and an increased risk of homelessness

**Non-homeless Special Needs 91.205 (d) including HOPWA**

\*Please also refer to the Non-homeless Special Needs Tables 1A & 1B or, in the CPMP Tool, the Needs.xls workbook.

10. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, public housing residents, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (Table 1B or Needs.xls in CPMP Tool) of their Consolidated Plan to help identify these needs.

Table 1B Special Needs (Non-Homeless) Populations Table, which is included in this document, provides the estimates requested in this question.

**Lead-based Paint 91.205 (e)**

11. Estimate the number of housing units\* that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.

The City of Trenton has been designated as a Priority I area for lead poisoning prevention activities. Low-income children living in the city are considered high risk for lead poisoning because a large proportion of city housing units are older and in substandard condition. Family poverty and poor nutrition also increase the risk of lead poisoning for these children. About 18% of the children tested through the City’s clinics are found to have increased lead levels. According to the 2006-2008 American Community Survey, approximately 25,344 homes in the City of Trenton were built prior to 1978 out of a total of 32,743 housing units. To illustrate the severity of this issue, ISLES, Inc. a non-profit group in the City of Trenton, performed dust samples on 1,299 homes in the City of Trenton. 66% tested positive for hazardous levels of lead and 20% had detectable levels of lead. Analyzing Census data on the age of housing in Trenton with data on median household income, the City of Trenton estimates that some 50% of its housing stock poses a lead exposure problem for residents.

Below are the results of Isles’ tests. Attachment E is a map showing the location of the 1,299 homes tested and the results of the tests.

Test results as of February 2010

| # | % |
|---|---|
|---|---|

|      |         |  |
|------|---------|--|
| 434  | 33.41%  | NCHH*-only (these are the cases that would not be considered positive under EPA standards) |
| 425  | 32.72%  | EPA  |
| 274  | 21.09%  | Detectable   |
| 115  | 8.85%   | Non Detectable (no lead)   |
| 51   | 3.93%   | No Results   |
| 1299 | 100.00% | Total  |

(859(#)) 66.13% NCHH-only and EPA (total positive))

| standards   | NCHH + EPA | NCHH   | EPA   | Detectable | No detection | No results |
|-------------|------------|--------|-------|------------|--------------|------------|
| # or units  |            |        |       |            |              |            |
| 859         | 66.13%     |        |       |            |              |            |
| 434         |            | 33.41% |       |            |              |            |
| 425         |            |        | 32.72 |            |              |            |
| 274         |            |        |       | 21.09%     |              |            |
| 115         |            |        |       |            | 8.85%        |            |
| 51          |            |        |       |            |              | 3.93%      |
| Total 1,299 |            |        |       |            |              |            |

\*National Center for Healthy Housing (NCHH)

\* *If using the CPMP Tool, this number can be provided on the Housing Needs Table in the Needs.xls file.*

## HOUSING MARKET ANALYSIS

### Housing Market Analysis 91.210

Refer to the Housing Market Analysis Table in the Needs.xls workbook

12. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.

As part of its HOPE 6 application, the Trenton Housing Authority commissioned a market study in 2009 to determine the demand and absorption rate of their proposed development. This study examined the affordable and market rate housing markets within a three mile competitive market area (the entire city). This study reports that the total housing stock in the City increased from 33,908 units in 2000 to 34,909 units in 2009 (+3%) and projects an increase to 35,699 units by 2014 (+2.3%). Well managed affordable housing developments were usually occupied upon completion or within weeks of completion. Market rate homes were found to require more time before occupancy with an absorption rate of 1-2 units +/- per month. For homeownership, the study found that their data supports a homeownership sales market in the \$150,000 to \$175,000 +/- price range. However, the report notes that a more meaningful gauge of future homeownership sales price will be dependent

upon the income requirements of the individual buyers. The study also found that turnover rates varied between market rate and subsidized housing, with age, condition and competency of management also affecting turnover rates. Market rate housing was found to have a turnover rate of approximately 20%-35% with newer subsidized housing experiencing a rate of only 5%-15%.

A detailed study of Trenton's housing market can be found in Attachment F – Trenton's 2010-2015 Housing Market Analysis Report, and Attachment G - Housing Market Analysis Table, and Attachment D, the Comprehensive Housing Affordability Strategy (CHAS) Table. Overall, the CHAS data shows that the City of Trenton has seen little growth over recent years, with slight population and household loss and only slight increases in median household income. These trends are similarly reflected by a lack of overall activity in the housing market, except for an increase in foreclosures throughout 2009. An analysis of annual demand, based on historical household trends and annual turnover, indicates total demand of 221 for-sale housing units and 937 rental housing units in the Trenton housing market. Given the lack of household growth in recent years, a majority of this demand is likely met by the existing housing inventory.

This analysis also revealed that there is a persistent lack of housing affordability for lower income families; 66 % of households earning less than 30% of the area median income (AMI) spend over half of their annual income on housing each year. According to U.S. Department of Housing and Urban Development foreclosure data from 2007 and the first half of 2008, foreclosures in Trenton continue to represent 85%-90% of foreclosures within Mercer County. Overall, the City of Trenton's foreclosure rate was 9.8% during this time period with South Trenton/Waterfront, Downtown/Central West, and Stuyvesant/Prospect/Penning having the highest foreclosure rates of 10.9%, 10.8%, and 10.5%, respectively. Top Road/East Trenton (North) and the West Trenton neighborhoods had the lowest foreclosure rates of 8.4% and 8.9%, respectively. The Chambersburg/Franklin Park/Chestnut Park area had the majority of Trenton's foreclosures during this time period, with 305, or 32% of the city's foreclosures.

In comparison, the foreclosure rates in the city's HUD sponsored homeownership zone remain minimal with 3 foreclosures out of 307 units. This low rate is attributable to a focus on housing cost burdens for buyers - making sure that housing costs were no more than approximately one-third of gross monthly income, low debt to income ratios and pre and post purchase counseling provided as an integral part of the process giving the requisite financial knowledge to buyers. Additionally, the HOME retention documents capped refinancing to not exceed 95% of loan to value ratio and our program did not allow no-document loans and Stated Income and Stated Asset (SISA) documents for loan qualification.

Clearly, we need more counseling and financial education programs since housing opportunities for extremely-low income renters was identified as a priority from the CHAS data. Consequently, HOME funds will be used to provide more affordable ownership opportunities for residents.

The City will continue to partner with the Trenton Housing Authority, Trenton City Home and other non-profit and for profit partners to apply for HOPE VI Program Funds, Neighborhood Stabilization Program Funds, as well as Choice Neighborhoods Initiative Funds. The creation of more ownership opportunities will continue to be the catalyst to stabilize cash-starved, disadvantaged parts of the city since wealth

creation is an important component in the community building process. Ownership gives people a real stake in their community, strengthening the bonds of citizenship and the connections between people, institutions, and places. Ownership done properly, anchors jobs locally, expands the provision of public services, and ensures local economic stability.

13. Provide an estimate; to the extent information is available, of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.

The City of Trenton estimates that there are about 1,500 vacant or abandoned properties within its jurisdiction. This represents approximately 5% of all properties in the city. The department of Inspections estimates that 125 of these properties are substandard nuisance structures that cannot be rehabilitated within reasonable costs. Thus, approximately, 1,375 properties in Trenton may be suitable for rehabilitation.

An analysis of the ownership of vacant properties was done in 2007. According to the analysis, approximately 30% of the total vacant properties were owned by the City of Trenton, while 70% were privately owned at that time.

The City has dealt with the problem of vacant buildings for many years; the city has experienced property abandonment since the 1960's resulting in public ownership of thousands of parcels of tax-reverted property. While property disposition for redevelopment is pretty aggressive, the sheer number of the properties is overwhelming. There have been many successful building rehabilitation projects in Trenton including projects such as a 29 unit project on Carroll Street, a 19 unit project on Ewing Street, a 52 unit project on Spring Street and Passaic Street, among others.

The following tools are used to rehab these buildings:

- a) Redevelopment Plans. Where appropriate and possible, Trenton uses the New Jersey Redevelopment Law, which allows the city to create redevelopment areas and expedite the disposition of abandoned properties to redevelopers. Projects in redevelopment areas are usually large-scale, averaging from 10-150 units. Projects of this scale have the potential to eradicate blight and positively impact neighborhood values.
- b) Local Lands and Buildings Law NJSA 40A:12-1 allows for disposition of city owned properties through regular auctions. Many vacant properties were acquired by the City through involuntary means (tax foreclosure, primarily). Buildings and buildable lots are often auctioned with the stipulation that they be redeveloped for home ownership, which conforms to the City's goal of increasing and supporting homeownership.
- c) Historic district and historic landmark designations. Rehabilitation of properties in historic districts and properties with historic landmark status are overseen by the City's Landmarks and Historic Preservation Commission. To encourage redevelopment of historic properties, the Trenton Historic Society offers grants



for rehabilitation and awards for rehabilitation projects that maintain the historic integrity of buildings.

d) While the City is primarily concerned with properties it owns, it is also concerned with the privately-owned vacant properties. To that end, the City has investigated the New Jersey Abandoned Properties Act and the receivership laws to expedite the redevelopment of privately-owned abandoned properties.

e) The City's small developer program is another tool for the disposition of properties. In this program, 1-5 units are turned over to a developer under a disposition agreement. Developers have an 18 month timeline for redeveloping the properties. In the last eight years, the city has redeveloped over 150 properties through this process. In addition to expanding housing opportunity, the small developer process allows increased local/minority participation in the development process and economic opportunity for underserved communities.

### **Public and Assisted Housing 91.210 (b)**

14. In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including
- the number of public housing units in the jurisdiction,
  - the physical condition of such units,
  - the restoration and revitalization needs of public housing projects within the jurisdiction,
  - the number of families on public housing and tenant-based waiting lists and
  - results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25).

*The jurisdiction can use the optional Priority Public Housing Needs Table of the Consolidated Plan to identify priority public housing needs to assist in this process.*

Of the 1596 public housing units owned and operated by the Trenton Housing Authority (THA), 411 (25.8%) are designated for senior citizens, with the balance in family units. Out of the inventory there are 174 efficiency units, 478 one bedrooms, 653 two bedrooms, 271 three bedrooms and 20 four bedrooms. The resident population of Trenton's public housing is 95.5% African-American with the balance divided between Latino and White non-Latino households. The average income of resident households is \$14,192 and about 7.9% of the resident households rely on public assistance as their primary source of income. Another percentage earns a moderate income, a group that represents potential clients for homeownership.

Over the next 5 years, the cost of the physical needs at the Trenton Housing Authority (THA) will exceed \$43 million. Of that amount, approximately \$16.5 million is needed to address THA's immediate needs. The primary goal is to raise funds and to continue to address the most urgent physical needs with available funds; and identify and use other resources to address other immediate needs. To that end, the following objectives will be the focus over the next five years:

1. Apply for and obtain 9% tax credits through the New Jersey Housing and Mortgage Finance Agency for the renovation of Page and Campbell Homes.
2. Apply for subsequent rounds of tax credits to complete renovations at Wilson Homes.
3. Use of HOPE VI funding for the renovation of the Miller Homes community.
4. Use funding to:
  - a. Complete essential electrical, elevator and building envelope improvements at the senior/disabled community.
  - b. Address anticipated capital infrastructure emergencies resulting from age of facilities.
  - c. Provide more efficient and effective security improvements at all developments.
  - d. Modernize
5. Implement energy performance contracts to reduce utility costs and begin using savings to address immediate needs THA-wide. Apply for a phase II Energy Conservation Measures with the anticipated savings.

15. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

**Number of Families Targeted by Federal, State, Local Funding Residing at the Trenton Housing Authority**

| Family Type                    | Overall |
|--------------------------------|---------|
| Income <= 30% of AMI           | 10,544  |
| Income > 30% but <= 50% of AMI | 4,421   |
| Income > 50% but < 80% of AMI  | 2,733   |
| Elderly                        | 3,104   |
| Families with Disabilities     | 7,962   |

*\* Represents total households at or below 80% AMI. Approximately 36% (6,289) of the aggregate total of those households are considered to have housing needs (based on the expenditure of over 30% of income on housing needs).*

No units are expected to be lost.

**Homeless Inventory 91.210 (c)**

16. The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A or in

the CPMP Tool Needs Table. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. This inventory of facilities should include (to the extent it is available to the jurisdiction) an estimate of the percentage or number of beds and supportive services programs that are serving people that are chronically homeless.

*The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.*

### **Special Need Facilities and Services 91.210 (d)**

17. Describe, to the extent information is available, the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring persons returning from mental and physical health institutions receive appropriate supportive housing.

### **Barriers to Affordable Housing 91.210 (e)**

18. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

#### **a. Development Issues**

In 1998, New Jersey put into place a Rehabilitation Subcode that no longer subjected projects involving existing buildings to the criteria imposed on new construction. The Rehab Subcode generated a substantial jump in rehab activity in the state, especially in urban areas like Trenton. Consequently, there are no substantial impediments to appropriately located and properly planned affordable housing development in the City. Nor does the time typically required for land use approvals result in undue delay to developers of affordable housing.

#### **b. Regulatory Issues**

New and pending requirements from the State Department of Environmental Protection (NJDEP) such as the newly issued Vapor Intrusion Guidance, new remediation standards for soil, new state requirements under the Site Remediation Reform Act and pending presumptive remedies based on future land use impose additional cost burdens on the reuse of contaminated sites. Although the City of Trenton has made effective use of State and Federal grants to remediate sites to unrestricted use standards for housing development, the projected increased costs for environmental cleanup is requiring that the City reevaluate its future ability to completely cleanup sites for future residential development.

#### **c. Funding Issues**

The availability of public funds for affordable housing is negligible relative to the need for such housing. The City of Trenton will continue to apply for and support a wide range of relevant development applications. The City will continue its largely successful efforts to leverage funding from different sources to make priority projects work. The City will continue to advocate, especially at the state level, not only for increased housing funding, but for changes in broad fiscal and tax policies affecting the State's urban areas

## STRATEGIC PLAN

The strategic plan must describe how the jurisdiction plans to provide new or improved availability, affordability, and sustainability of decent housing, a suitable living environment, and economic opportunity, principally for extremely low-, low-income, and moderate-income residents.

### General Priority Needs Analysis and Strategies 91.215 (a)

19. In this narrative, describe the reasons for setting priorities for allocating investment among different activities and needs, as identified in tables\* prescribed by HUD. 92.215(a)(1)

*\*If not using the CPMP Tool: Complete and submit Table 1A Homeless and Special Needs Population; Table 1B Special Needs (Non-Homeless) Populations; Table 2A Priority Housing Needs/Investment Plan Table; and Table 2B Priority Community Development Needs.*

*\* If using the CPMP Tool: Complete and submit the Needs Table file: Needs.xls*

*Table 1A, Table 1B, Table 2A and Table 2B have been completed and are submitted with this plan.*

20. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which 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). Attachment H shows the areas of the city that qualify for CDBG funding, based on the low-moderate income criteria for Trenton. As the map shows, portions of all census tracts in the city meet the LMI criteria with one exception (Census Tract 6, or the Villa Park neighborhood). (Note that the source data is by Census Blockgroup; Census Tracts are comprised of Blockgroups.) Attachment I shows the neighborhoods of Trenton.

In Trenton itself there are clear patterns of racial segregation throughout the City. Tract data from the 2000 Census 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.

As such, many areas of Trenton have substantial community development needs. The City has, however identified one area, Canal Banks, for focused home ownership investment. Attachment I shows the neighborhoods of Trenton and the location of the Canal Banks Homeownership Zone (HOZ). The Canal Banks area is of particular importance since it forms the northern perimeter of downtown Trenton, framing and strongly influencing the downtown. The neighborhoods known as Central West and Battle Monument and North 25 and part of Stuyvesant/Prospect are in the Canal Banks HOZ. These are represented by Census Tracts 9, 11 and 15 and have the City's greatest concentration of low-income households.

The City of Trenton has recently been awarded HOPE VI funds from HUD. The HOPE VI project will be focused on the former Miller Homes site, which is in close proximity to the city's newly renovated train station. The community will be compact and walkable, allowing residents to live a higher quality life without complete dependence on a car for mobility and survival. We believe improvements to the train station and the neighborhoods around it can and should attract more people and businesses to live and do business in Trenton. Redevelopment in the neighborhoods around the train station is considered critically important to the future success of Trenton as a whole. To this end, the city has embarked on an ambitious plan to redevelop the train station area into a key transit village. This plan includes the revitalization of the Trenton Housing Authority's Miller Homes Project and the surrounding neighborhood with HOPE VI funds and the development of three major mixed-use projects; a combined total of \$374 million of LEED-certified offices, retail space and housing within a mile of the train station totaling an excess of \$745 million over the next 4 to 5 years. Over the next five years, Trenton will capitalize on opportunities to create a 24/7 downtown presence, with complimentary services available after 5 p.m. and on the weekends that meet the needs of residents of all income levels.

In addition to the high density, high-quality developments within a 10-minute walk of the Trenton train station, the city is planning collector support transit systems, including trolleys and streetcars to support and enhance ridership for the light rail system and buses. The redesign of the Train Station neighborhood will also allow people to travel safely by bicycle and other non-vehicular means. The Train Station neighborhood will include reduced and managed parking inside a 10-minute walking radius around the train station. To support this effort, the City has applied to the Environmental Protection Agency for design assistance under the Greening America's Capitals Program; is in the process of applying for a \$3 million Sustainable Communities Challenge Planning Grant; and will apply for additional implementation funds from the CHOICE Neighborhoods Initiative

21. If applicable, identify the census tracts for Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

Does not apply to Trenton

22. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).

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). Attachment H of the

Consolidated Plan shows the areas of the city that qualify for CDBG funding, based on the low-moderate income criteria for Trenton. As the map shows, portions of all census tracts in the city meet the LMI criteria with one exception (Census Tract 6, or the Villa Park neighborhood). (Note that the source data is by Census Blockgroup; Census Tracts are comprised of Blockgroups.) Attachment I of the Consolidated Plan shows the neighborhoods of Trenton.

Many areas of Trenton have substantial community development needs. The City has, however identified the Train Station area as an area that will receive special attention in the 2010 Program Year. This is because the City was recently awarded HOPE VI funds from HUD. The HOPE VI project will be focused on the former Miller Homes site, which is in close proximity to the city's newly renovated train station. We believe improvements to the train station and the neighborhoods around it can and should attract more people and businesses to live and do business in Trenton. Redevelopment in the neighborhoods around the train station is considered critically important to the future success of Trenton as a whole. To this end, the city has embarked on an ambitious plan to redevelop the train station area into a key transit village. This plan includes the revitalization of the Trenton Housing Authority's Miller Homes Project and the surrounding neighborhood with HOPE VI funds and the development of three major mixed-use projects; a combined total of \$374 million of LEED-certified offices, retail space and housing within a mile of the train station totaling an excess of \$745 million over the next 4 to 5 years. Over the next five years, Trenton will capitalize on opportunities to create a 24/7 downtown presence, with complimentary services available after 5 p.m. and on the weekends that meet the needs of residents of all income levels.

23. If appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

Does not apply to Trenton

24. Identify any obstacles to meeting underserved needs.

Trenton's ability to meet underserved needs is hampered by a number of obstacles including the following:

- the city is 7.5 square miles and most of this space is built-up, so the availability of land for construction is extremely limited;
- inability to secure matching funds for grant funds, as public support for abatements crumbles;
- securing the requisite tax abatements to make projects feasible is increasingly harder;
- decreases in funding from other government agencies; and
- recent and anticipated reductions in City staff to ensure that community development programs are carried out within the requirements of the programs.

### **Specific Objectives 91.215 (a) (4)**

25. Summarize priorities and specific objectives the jurisdiction intends to initiate and/or complete in accordance with the tables\* prescribed by

HUD. Outcomes must be categorized as providing either new or improved availability/accessibility, affordability, or sustainability of decent housing, a suitable living environment, and economic opportunity.

**Goals and objectives to be carried out during the strategic plan period are indicated by placing a check in the following boxes.**

|                          | <b>Objective Category<br/>Decent Housing</b><br>Which includes:  |                          | <b>Objective Category:<br/>Suitable Living<br/>Environment</b><br>Which includes:  |                          | <b>Objective Category:<br/>Expanded Economic<br/>Opportunities</b><br>Which includes:  |
|--------------------------|--|--------------------------|--|--------------------------|--|
| <input type="checkbox"/> | assisting homeless persons obtain affordable housing   | <input type="checkbox"/> | improving the safety and livability of neighborhoods   | x                        | job creation and retention   |
| x                        | assisting persons at risk of becoming homeless   | <input type="checkbox"/> | eliminating blighting influences and the deterioration of property and facilities  | x                        | establishment, stabilization and expansion of small business (including micro-businesses)  |
| x                        | retaining the affordable housing stock   | <input type="checkbox"/> | increasing the access to quality public and private facilities   | x                        | the provision of public services concerned with employment   |
| x                        | increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability | x                        | reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods | x                        | the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan |
| <input type="checkbox"/> | increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/ADOS) to live in dignity and independence   | x                        | restoring and preserving properties of special historic, architectural, or aesthetic value   | <input type="checkbox"/> | availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices                 |
| <input type="checkbox"/> | providing affordable housing that is accessible to job opportunities   | <input type="checkbox"/> | conserving energy resources and use of renewable energy sources  | x                        | access to capital and credit for development activities that promote the long-term economic social viability of the community            |

***Identify Specific Objectives and Proposed Outcomes by completing Table 1C or 2C – Summary of Specific Objectives***

Table 1C is completed and included in this document.

## HOUSING

### Priority Housing Needs

### 91.215 (b)

26. Describe the relationship between the allocation priorities and the extent of need given to each category specified in the Housing Needs Table (Table 2A or Needs.xls). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of

the Consolidated Plan.

Table 2A is completed and included in this document.

27. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category, particularly among extremely low-income, low-income, and moderate-income households.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

The U.S. Department of Housing and Urban Development (HUD) defines low- to moderate- income (LMI) households as households with an income below 80% of the County median income. Within that category, there are three income levels. Extremely low- income households have an annual income below 30% of the MSA median income. Low- income households, have an annual income between 30- 50% of the MSA median income. Lastly, moderate- income households have an annual income between 50- 80% of the MSA median income.

Trenton's Housing Market Analysis Report for 2010-2015 identified 4,576 renter households and 3,727 owner households with incomes less than or equal to 30% of MFI. There are 2,196 renter households and 1,795 owner households with incomes 30-50% of MFI. Also, there are 2,297 renter households and 1,878 owner households with incomes 50-80% of MFI.

Within these categories, this section focuses on the specific housing problems of cost- burdened and severe cost- burdened households. Housing cost burden is when a household must pay more than 30% of monthly income for housing costs. Housing costs may consist of rent and utilities for renters, mortgage, real estate taxes, and insurance for owners. Severe cost burden exists when more than 50% of a household's income is allocated towards housing costs.

In Trenton, severe cost burden is concentrated within the extremely low-income category. Of the extremely low-income renters, 79% are cost burdened and 50% experience severe cost burden. Of the extremely low income homeowners, 93% are cost burdened and 66% experience severe cost burden. Of the low income renters, 61% are cost burdened and 25% experience severe cost- burdened. Of the moderate income renters, 25% are cost burdened and 2% experience severe cost-burden. As household income increases, the incidence of severe cost burden generally declines. For instance, only 1% of owner households making 80% of MFI and above are severely cost burdened and 6% are cost burdened. Similarly, 3% of renters making 80% of MFI are cost burdened; there are no numbers reported for severe cost burden in this income category.

We will also make note of those groups that will be particularly vulnerable to housing needs in the future. Currently there are 1,994 persons with HIV/AIDS, 1,800 to 1,900 victims of domestic violence including children, and 1, 516 public housing residents.



28. Identify any obstacles to meeting underserved needs.

Trenton's ability to meet underserved needs is hampered by a number of obstacles including the following: the availability of suitable land to construct facilities, inability to secure matching funds, requirements for property tax abatements to qualify for funding, decreases in supportive funding from other government agencies, and recent and anticipated reductions in City staff to ensure that community development programs are carried out within the requirements of the programs.

### **Specific Objectives/Affordable Housing 91.215 (b)**

Note: Specific affordable housing objectives must specify the number of extremely low-income, low-income, and moderate-income households to whom the jurisdiction will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. (24 CFR 91.215(b)(2))

29. Identify each specific housing objective by number (DH-1, DH-2, DH-2), proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period, or in other measurable terms as identified and defined by the jurisdiction.

*Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls file.*

*Table 1C is included in the Tables section of this document.*

30. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

The City of Trenton has a good history of leveraging Federal, State and local public and private sector resources for community development needs. We will continue to seek out grants from these sources. Mayor Mack and the new administration, has already taken steps to increase the city's ability to leverage funds into the future by prioritizing grant writing and public and private partnerships in order to maintain and expand programs that will benefit the community.

31. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units.

As described in the recent housing market studies done for Trenton, the total housing stock in the City is projected to increase by 5% from 2000 to 2014. Trenton will continue to focus on homeownership opportunities. Given that the studies indicate that future homeownership sales price will be dependent upon the income requirements of the individual buyers, the city will also be focusing on pre and post purchase counseling/financial literacy programs for homeowners.

The City will continue to work to rehabilitate properties. In order to increase the number of properties rehabilitated, we intend to fund the city's existing homeowner rehab program at a higher level, increasing the amount set-aside for the rehab program from \$165,000 per year to approximately \$400,000 per year. In addition,

to the greatest extent possible, the City will utilize all of the tools at its disposal to rehabilitate old units. Several of these tools are described in the response to question 13.

32. If the jurisdiction intends to use HOME funds for tenant-based rental assistance, specify local market conditions that led to the choice of that option.

Does not apply to Trenton

## **Public Housing Strategy 91.215 (c)**

33. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting lists).

The Trenton Housing Authority's goal is to increase the availability of decent, safe and affordable housing. The strategies that the THA will use to achieve this goal are listed below.

The THA will expand the supply of assisted housing by:

- applying for 9% tax credits to complete modernization at Page Homes and Frazier Courts;
- creating additional housing opportunities by leveraging replacement housing funds to increase inventory;
- applying for FY10 HOPE VI funding for the Miller Homes development
- acquiring and developing scattered site housing through leveraged RHF dollars and HOPE VI funding; and
- applying for Neighborhood Stabilization Program funds to acquire and rehab foreclosed property in the City of Trenton.

Other efforts to improve public housing over the course of the next five years include:

- Reducing turnover time for vacated public housing units
- Reducing time to renovate public housing units
- Seeking replacement of public housing units lost to the inventory through mixed finance development
- Undertaking measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

34. Describe the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing.

The THA will improve the quality of assisted housing by:

- improving the quality and timeliness of maintenance repairs;
- tracking work order completion and follow-up inspections of completed maintenance repairs;
- improving preventive and routine maintenance management programs;
- completing renovation or modernization of 1,576 public housing units; and

- implementing a comprehensive security camera system into all facilities to ensure we meet our goals of safe housing. In addition, keyless entry pads will be incorporated into all buildings with three story walk-ups.

35. Describe the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

The Trenton Housing Authority's efforts to improve the living environment for residents of public housing in the city are primarily focused on increasing resident safety and preventing crime. The THA contracts with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities. To help reduce the likelihood of criminal activity, the THA and its contractors also follow the principles of Crime Prevention Through Environmental Design.

The THA employs its own security guards as well as contracted security guards who provide building security for 24 hours 7 days/week at all Senior buildings. The THA has installed security cameras at all developments and constructed a manned 24 X 7 Security Command Center where residents can call in problems. The THA will also be installing keyless entry systems and video phones for tenants in three-story walk-ups.

The THA will coordinate with the Trenton Police Department, by involving police in development, implementation, and/or ongoing evaluation of drug-elimination plans as well as in the location of security cameras.

Police regularly meet with the PHA management and residents. The police provide crime data to housing authority staff for analysis and action. There is an agreement between the PHA and local law enforcement agency for provision of above-baseline law enforcement services along with the coordination of sharing video links to the Police Command Center for high crime areas.

Monthly meetings with senior police department and THA leaders are ongoing to reduce crime and prevent drug related activities. A hot line is established between the THA and the police to combat problems. The THA is also coordinating with local officers to share video feeds to the patrol cars for "virtual tours" of the developments.

Other efforts to improve the living environment for public housing residents include THA and City sponsorship of activities targeted to at-risk youth, adults, or seniors. In addition, the THA will promote self-sufficiency and asset development of families and individuals by applying for grants to obtain additional staff support and by providing homeownership training?, participating in green jobs training initiatives and literacy training.

Additionally, in an effort to improve the self-sufficiency of residents, THA will increase the availability of city, county and state social, educational, and health services to residents by maximizing the on-site provision of those services.

36. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage

public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

As noted in our response to Question 35, efforts to improve the living environment for residents of public housing in Trenton are focused on increasing resident safety and preventing crime. When residents work with the THA to prevent crime, they are becoming involved in management activities.

Other efforts to encourage public housing residents to become more involved in management and participate in homeownership include THA and City sponsorship of activities that promote self-sufficiency and asset development of families and individuals. The THA will apply for grants to obtain additional staff support to provide homeownership training, participate in green jobs training initiatives and literacy training.

37. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

Does not apply to Trenton

## HOMELESS

### Priority Homeless Needs

\*Refer to the Homeless Needs Table 1A or the CPMP Tool's Needs.xls workbook

38. Describe the jurisdiction's choice of priority needs and allocation priorities, based on reliable data meeting HUD standards and reflecting the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals.

During the monthly County Emergency Assistance Systems (CEAS) meetings, CoC and the County of Mercer Human Services committee meetings homeless services providers, concerned citizens and several homeless persons meet to discuss and set priority needs regarding homeless families with children and individuals.

39. Provide an analysis of how the needs of each category of residents (listed in question #38) provided the basis for determining the relative priority of each priority homeless need category.

Trenton/Mercer has a centralized intake system for all families and individuals who are homeless or potentially homeless. The system allows homeless and supportive services providers to set priority needs of the homeless and non-homeless. In addition, the data from the point-in-time count is used to determine priority needs.

40. Provide a brief narrative addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.

A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

The sheltered and unsheltered chronically homeless in Trenton is characterized by high incidence of unemployment, mental illness, substance abuse, substandard housing conditions and high costs burden among low-income renter households. The City of Trenton has a great need for additional permanent beds for the sheltered and unsheltered chronically homeless. (See the attached CoC shelter & unsheltered population tables).

## **Homeless Strategy 91.215 (d)**

### Homelessness

41. Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living.

Trenton, in collaboration with Mercer County and the State Department of Human Services, implemented a Single Point of Entry System for homeless services, to end homelessness in Mercer County. The primary focus is in Trenton where the largest concentration of homelessness exists. In 2009 the City of Trenton received \$1,251,452.00 from the American Recovery Re-Investment Act, Homeless Prevention Rapid-re-housing Program. The funds were made available through an RFP in the following program areas: Emergency Assistance, Housing crisis and Rapid Re-housing for families and the chronically homeless.

42. Describe the jurisdiction's strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

The City of Trenton received the only Rapid Re-housing demonstration program grant in the State of New Jersey. The grant will enable the City of Trenton develop a strategy to serve the extremely low-and low income families who are at imminent risk of becoming homeless. The following services will be provided: housing placement, rental assistance, case management, legal assistance, literacy training, job training, mental health services, childcare services, and substance abuse services. In addition, the City's American Recovery Re-Investment Act -Homeless Prevention Rapid re-housing program will provide the same services for low income individuals who are at imminent risk of becoming homeless.

## Chronic Homelessness

43. Describe the jurisdiction's strategy for eliminating chronic homelessness. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented in Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness.

The City of Trenton strategy for eliminating chronic homelessness is part of the Trenton/Mercer CoC Ten Year Plan to End Homelessness. The Mercer Alliance to End Homelessness, the group that developed the plan, has recently completed a mid-term update. In addition, to fully implementing Housing First for the chronically homeless over the next year, the updated plan has specific strategies that will target resources to address the creation of permanent housing for the chronically homeless. These are: (1) Making homes available as rapidly as possible for those with high and moderate service needs. (2) Prioritize housing vouchers for people with high and moderate barriers. (3) Ensure an inventory of safe, affordable apartments in the rental market. (4) Rehabilitate existing buildings to create rental homes. (5) Include a percentage of homes for formerly homeless tenants in affordable housing projects in all our municipalities.

44. Describe the efforts to increase coordination between housing providers, health, and service agencies in addressing the needs of persons that are chronically homeless. (91.215(I))

All local housing, health and services agencies attend the monthly CEAS and CoC meetings to share information, plan and develop strategies and programs. This coordinated effort will ensure that the needs of the chronically homeless are met.

## Homelessness Prevention

45. Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.

The City of Trenton will use its 2009 American Recovery & Reinvestment Act funds (Homelessness Prevention and Rapid Re-housing Program) and the ESG funding to provide temporary financial assistance such as security deposits, utility assistance deposits, moving costs and /or services to help persons gain housing stability.

## Institutional Structure

46. Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.

Attachment J lists all the CoC member organizations, which are directly involved in carrying out the City of Trenton's homelessness strategy.

## Discharge Coordination Policy

47. Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include “policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.” The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

The Trenton/ Mercer Continuum of Care (CoCo) worked with the New Jersey Policy Academy to develop the State of New Jersey discharge plan. The vision for this Plan 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 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 AID, prevents discharges from facilities without the immediate provision of shelter. Thus, the States' plan guarantees no persons being discharged from and institutional setting into homelessness.

Because 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 dependency to independent adult living. Many of these programs include permanent housing.

### **Specific Objectives/Homeless (91.215)**

48. Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables\* prescribed by HUD, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. For each specific objective, identify proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (one, two, three or more years) or in other measurable terms as defined by the jurisdiction.

*Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.*

In the coming year, Trenton will collaborate with Mercer County and the State Department of Human Services to implement a Single Point of Entry System for the homeless services, to end homelessness in Mercer County. The primary focus is in Trenton where the largest concentration of homelessness exists. In 2009, the City of Trenton received \$1,251,452 from HPRP. The funds were made available through an RFP in the following program areas: Emergency Assistance, Housing Crisis and Rapid Re-housing for families.

Below are the city specific strategic plan objectives with regard to homelessness:

1. Create new permanent housing beds for chronically homelessness individuals by:  
(a) Making housing available as rapidly as possible for those with high and moderate services needs. (b) Prioritize housing vouchers for people with high and moderate barriers. (c) Rehabilitate existing building to create rental homes.

2. Increase percentage of homeless persons staying in permanent housing over 6 months to at least 77 percent. (a) Ensure services for those with High and Moderate needs (b) Provide flexible in-home case management and support to access needed services for those who were formerly homeless (c) Increase income & employment, so that homes can be sustained (d) Accessing mainstream resources (e) Implementing a client-centered approach to employment, with support as needed.

3. Increase percentage of homeless persons moving from transitional housing to permanent housing to at least 65 percent. (a) Provide services for those with High and Moderate needs (b) Provide flexible in-home case management and support to access needed services for those who were formerly homeless (c) Increase income & employment, so that homes can be sustained (d) accessing mainstream resources.

4. Increase percentage of persons employed at program exit to a least 20 percent (a) provide services for those with High and Moderate needs (b) provide flexible in-home case management and support to access needed services for those who were formerly homeless (c) Increase income & employment, so that homes can be sustained (d) accessing mainstream resources (e) Implementing a client-centered approach to employment, with supports as needed.

5. Decrease the number of homeless households with children. (a) Decreasing the number homeless households with children has focused on prevention and rapid re-housing. (b) Homeless Outreach & Prevention efforts (HOPE) targets families that are deemed to be at risk for homelessness e before they reach the breaking point of losing their homes. HOPE will work with them through intensive case management. (c) Mercer County is just beginning this Rapid Re-housing demonstration to serve at least 50 families in 2010 (d) An important part of our Rapid Re-housing strategy has been to hire a Housing Locator to aggressively develop the stock of available rental housing (f) Our plan call for rapid re-housing 200 families during the three-year demonstration.

## NON-HOMELESS SPECIAL NEEDS

\*Refer to Table 1B Non-Homeless Special Needs or the CPMP Tool's Needs.xls workbook



## Priority Non-Homeless Needs 91.215 (e)

49. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

The City of Trenton will continue to utilize ESG funds to administer the Alternative Homeless Housing Assistance (AHHA) program and its' Purchase of Services program funded by FEMA to address to needs of persons who are not homeless but may or may not require supportive housing. Both programs provide funds to assist with back rent, back mortgages and emergency placements. The City's Adult & Family Services office will access the needs of persons who are not homeless and provide case management or make referrals to the approach office for assistance. The City of Trenton will work with the housing and supportive services providers to assist them in applying for funding from the Department of Community Affairs, County of Mercer and other funding sources, to expand their efforts to serve persons with disabilities, HIV/AIDS, drug addiction and alcohol abuse.

50. Describe the basis for assigning the priority given to each category of priority needs.

We assigned priorities based on data collected from the local Single Point of Entry Assessment Tool, which is used by most of the housing and supportive services providers. Most of the providers meet on a monthly basis to analyze the data in order to assign priority of need.

51. Identify any obstacles to meeting underserved needs.

Limited funding is an obstacle to meeting underserved needs. The City of Trenton/Mercer CoC committee worked with local advocacy groups for the homeless to persuade State legislators to create a Homeless Housing Trust Fund to assist housing and supportive services providers with meeting some the needs of the underserved.

52. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Mercer County Board of Social Services (MCBOSS) is the primary single point of entry for assistance for people who are homeless or not homeless. After an assessment is completed, the caseworker will provide the necessary services or refer to the appropriate agencies for assistance. In addition, the City of Trenton's Office of Adult and Family Services provides a number of services which address the needs of persons who are not homeless but are disabled, mentally and physical ill and require supportive housing. These services include: **(a)** Financial assistance to families and individuals in order to prevent homelessness. **(b)** Intensive and comprehensive case management services. **(c)** Home visits to seniors, homebound, and disabled in order

to conduct assessments. (d) Referrals to other social services agencies which may include substance abuse, counseling, medical and dental services, and educational and occupational training. (e) Referral to the Mayor's Office of Employment and Training for job search and development services. (f) Referrals to families and individuals seeking emergency food, clothing and furniture. (g) Information for budget management, cleaning up personal credit, buying a home and preventing foreclosures. As in the past, the City will continue to work with Enable, Inc, which makes housing accessible to persons with disabilities.

53. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

Does not apply to Trenton

### Specific Special Needs Objectives 91.215 (e)

54. Identify each specific objective developed to address a priority need by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e. one, two, three or more years), or in other measurable terms as identified and defined by the jurisdiction.

*The jurisdiction may satisfy this requirement by using Table 1C or, if using the CPMP Tool, the Projects.xls worksheets.*

Table 1C is included in this document.

Through the City of Trenton's Continuum of Care programs, objectives were developed to address priority needs of the homeless. The "Housing First" initiative will continue to enable Trenton/Mercer to develop additional permanent supportive housing units for the chronically homeless and other homeless subpopulations.

#### Special Needs Objectives:

- Increase the percentage of time chronically homeless persons stay in permanent housing over 6 months
- Increase percentage of chronically homeless persons employed at least by 18%
- Increase chronically homeless persons to receive SSI benefits by 11.4%
- Increase chronically homeless SSDI benefits by 4.4%
- Increase chronically homeless persons to receive Medicaid benefits by 13.3%
- Increase chronically homeless persons to receive Food Stamps by 20.2%

55. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

The City of Trenton, in collaboration with the County of Mercer, held a bidders conference regarding Request for Proposals (RFP) for the 2009/2010 Homelessness

Prevention Rapid Re-Housing program, the State Supportive Services funds for the Homeless (SSH), the 2009/2010 federal stimulus dollars for the Homeless and Trenton/Mercer CoC Rapid Re-housing grant for homeless families.

It is the goal of the funders to target all part of future funding sources to create a Single System of Entry for homeless prevention services. The expected outcomes of the Single System of Entry are to provide prevention, rapid re-housing and provide permanent housing for both individuals and families who are homeless or at imminent risk of homelessness. In addition, this system will put into practice the core principles of Trenton/Mercer Ten Year Planning Process:

- Develop a uniform system response to homelessness
  - Individuals and families need to be uniformly assessed to assure that services are provided based on need;
  - The system needs to have a capacity for immediate response;
  - Services following the immediate response need to be based on the needs identified in the uniform assessment
  - The system needs to be sensitive to the needs of individuals and families
  - The system needs to measure results.
- Prevent Homelessness wherever possible
  - No one should need to become homeless to receive services;
  - Priority should be to support people in safe, affordable housing.
- Rapidly re-house people when homelessness cannot be prevented
  - When people are stably housed everything else stabilizes
- Provide wraparound services for as long as needed to support stability and self-sufficiency
  - Individuals and families may need support to stabilize and maintain their housing;
  - Those with the highest needs should receive the most enriched services.

It is also the goal of the funders to work with other funding sources to utilize their prevention funding within a single system. Example: The Federal Emergency Management Agency (FEMA) Food and Shelter Program.

## COMMUNITY DEVELOPMENT

### Priority Community Development Needs 91.215 (f)

\*Refers to Table 2B or to the Community Development Table in the Needs.xls workbook

The information gained in the needs assessment (see question 5) was used to assist the City in defining priority community development objectives. The final assessment of priority needs can be seen in Table 2B.

The 2010 Annual Action Plan illustrates how the community development needs and priorities translate to activities which will occur during the next program year. Specifically, Table 3C. Listing of Proposed Projects, shows the city's community development priorities for the upcoming program year. It is expected that many of

the priorities and objectives identified in the first program year will remain priorities throughout the five years covered in this Consolidated Plan. Adjustments to these priorities will occur through the annual action plan process.

56. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table\* – i.e., public facilities, public improvements, public services and economic development.

As shown in Table 2B, Trenton's highest priority non-housing community development needs include the following Public Improvements/Infrastructure-type activities: Clearance and Demolition, Clearance of Contaminated Sites, and Sidewalks. In the area of Public Services the following activities are high priority needs: Senior Services, Youth Services, Health Services, and Lead Hazard Screening.

57. Describe the basis for assigning the priority given to each category of priority needs provided on Table 2B or the Community Development Table in the CPMP Tool's Needs.xls worksheet.

Recognizing the overall need exceeds the available CDBG allocation, we used the following scale to assign relative priority to each of the needs in Table 2B:

**High Priority:** Trenton plans to use funds for activities to address this need during the period 2010 - 2014.

**Medium Priority:** If funds are available, activities to address this need may be funded by the Trenton during the period 2010.

**Low Priority:** Trenton does not plan to use funds to address this need during the period 2010 – 2014. Trenton will consider certifications of consistency for other entities' applications for Federal assistance.

**No Such Need:** Trenton finds there is no need or that this need is already substantially addressed.

58. Identify any obstacles to meeting underserved needs.

Trenton's ability to meet underserved needs is hampered by a number of obstacles including the following: the availability of suitable land to construct facilities, inability to secure matching funds, insufficient community support, requirements for property tax abatements to qualify for funding, decreases in supportive funding from other government agencies, and recent and anticipated reductions in City staff to ensure that community develop programs are carried out within the requirements of the programs.

## Specific Community Development Objectives

59. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Complete and submit Table 2C Summary of Specific Objectives or, if*

*using the CPMP Tool, the Summaries.xls worksheets.*

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction. 24 CFR 91.215(a)(4)

## **Community Development/Public Facilities Objectives**

## **Community Development/Public Improvements Objectives**

## **Community Development/Public Services Objectives**

## **Community Development/Economic Development Objectives**

## **Neighborhood Revitalization Strategy Areas 91.215(g)**

60. If the jurisdiction has one or more approved Neighborhood Revitalization Strategy Areas, the jurisdiction must provide, with the submission of a new Consolidated Plan, either: the prior HUD-approved strategy, or strategies, with a statement that there has been no change in the strategy (in which case, HUD approval for the existing strategy is not needed a second time) or submit a new or amended neighborhood revitalization strategy, or strategies, (for which separate HUD approval would be required).

Does not apply to Trenton

## **Barriers to Affordable Housing 91.215 (h)**

61. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

The City of Trenton will continue to apply for and support a wide range of relevant development applications. The City will continue its largely successful efforts to leverage funding from different sources to make priority projects work. The City will continue to advocate, especially at the state level, not only for increased housing funding, but for changes in broad fiscal and tax policies affecting the State's urban areas.

## **Lead-based Paint 91.215 (i)**

62. Describe the jurisdiction's plan to evaluate and reduce lead-based paint

hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

The City of Trenton will continue programs currently operated by the City's Division of Health, such as screening children for elevated lead levels, and placing property owners under court notice to have lead removed from their buildings. Children found with high exposure are treated medically if necessary, their families are educated about lead poisoning prevention and their homes are investigated and/or remediated.

The City applied for the HUD Office of Healthy Homes, Lead Hazard Reduction Demonstration Grant in 2009 but was unsuccessful in being awarded the grant. This grant would have assisted the City in addressing Lead-Based Paint in homes where EBL levels were exceedingly high by interim control and abatement methods. The City intends to reapply for this grant in 2010.

Additionally, the, Division of Housing Production hands out lead education materials such as EPA's "Renovate Right" as part of the information package for all rehabilitation projects especially the Owner Occupied Rehabilitation Program.

As part of our systemic program policy change, staff members and all local contractors are encouraged to become certified in Lead Safe Work Practices. To date, we have two (2) staff members out of five staff members and eight (8) out of the 14 local contractors on the rehabilitation list are certified.

## **Antipoverty Strategy 91.215 (j)**

63. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually

### **Reducing the Number of Poverty-level Families**

In Trenton, the Division of Social Services assists residents with job training opportunities and job leads. Mayor's Office of Employment and Training (MOET) would expand the City's job placement services to focus on helping residents – including those with criminal records – overcome barriers and get jobs. MOET is part of the City's Department of Health and Human Services.

MOET focuses specifically on people with little work experience or a criminal background. In 2007, MOET:

- Interviewed and assessed the workforce readiness of 1,179 clients, including 699 ex-offenders;
- Secured jobs for 117 clients, including 62 ex-offenders;
- Developed relationships with a growing contingent of more than one hundred (100) employers willing to invest in people who want to turn their lives around;
- Been approved for the federal bonding program, which serves as an incentive by insuring participating employers against any business loss related to the hiring of ex-offenders.

64. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

MOET staff conduct assessments and consult with clients on the full range of their needs. Their efforts dovetail with those of the City Division of Social Services, including the on going Department of Labor funded STEP (Safe Transition to Employment Program) which targets youth between the ages of 19-21 who are not enrolled in any academic or vocational program (at the time of registration) and are unemployed or underemployed. Moreover, the Sherwin-Williams Homework Painter Training program has provided training and certification classes since April 2006.

MOET has also worked hand-in-hand with the Mayor's Office of Anti-Gang Initiatives and Youth Development, to offer alternatives to gang activity. It is vitally important that former – or potential – gang members have access to jobs, so they have a legitimate way to provide for their families.

MOET continues its mission of helping the Trenton community through personal outreach services. MOET also offers a series of workshops to prepare job seekers and to educate ex-offenders on the process of clearing their records (expungement).

### **Institutional Structure 91.215 (k)**

65. Provide a concise summary of the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, community and faith-based organizations, and public institutions.

Four departments 1) Housing and Economic Development, 2) Health and Human Services, 3) Inspections, and 4) Public Works will continue to work cooperatively in order to address the City's priority objectives for providing housing. The Division of Housing Production, in the Department of Housing and Economic Development, has the primary responsibility of developing affordable housing in the City and administering HOME Investment Partnership program funds. The Division of Community Relations and Social Services, in the city's Department of Health and Human Services, oversees the Emergency Shelter Grant program and implementation of the Continuum of Care program for the homeless. Attachment A is an organizational chart which shows the CDBG, ESG and HOME programs and illustrates the relationship between staff and program responsibilities.

The City will continue to work with and to nurture the many constructive relations it has developed with Federal, State and County entities, supportive service providers, non-and for-profit developers, and various financial institutions. These departments will continue to work together, along with the Department of Inspections, and the Department of Public Works, to address the City's priority objectives for providing housing.

The City will work to support not-for-profit housing organizations through the CHDO requirements of the HOME program.

66. Provide an assessment of the strengths and gaps in the delivery system.

The City of Trenton has taken an aggressive role in challenging lenders to participate more constructively in providing credit on reasonable terms for development of housing. The City has also engaged in dialogue with a number of financial institutions including Wells Fargo, Commerce Bank and the Bank of America, in an effort to connect them to specific programs in Trenton such as the rehabilitation program for below market interest rates on home improvement loans and retail development.

67. Describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the jurisdiction's economic development strategy. (91.215(I))

The City of Trenton's Division of Economic Development is responsible for the development of the City's economic development strategy. This has been accomplished primarily through the development and maintenance of the Community Economic Development Strategy (CEDS) document. The purpose of CEDS is to present an economic development strategy for the City of Trenton that can be used to assist in prioritizing projects and opening dialogue around economic development projects and objectives. The CEDS document is prepared with input from all local stakeholders including private industry, businesses, developers and social service agencies. In addition to CEDS, the City interacts with these groups under various programs to enhance redevelopment potential and quality of life. Private industry and business coordination is enhanced through programs such as: the Trenton Downtown Association and its various subcommittees; the annual Trenton Small Business Week; coordination through the state Urban Enterprise Zone program; and support of business loans and other support through the NJ Economic Development Authority and the Capital City Redevelopment Corporation. The City of Trenton is a major owner of real estate in the city, primarily through involuntary means. This problem requires that the city maintain ongoing relationships with the development community in order to redevelop properties, including brownfields sites, for residential, commercial, industrial and mixed uses. In addition, the city maintains a listing of developers as potential respondents for Requests for Proposals, Requests for Expressions of Interest, and other real estate matters. The City also utilizes developer outreach for regularly-scheduled property auctions to redevelop and return city-owned properties back to the tax roles. Finally, several City departments maintain relationships with multiple social services organizations for job training, community health, recreation and other quality of life issues that effect the local economy.

### **Coordination 91.215 (I)**

68. Describe the efforts to enhance coordination between public and assisted housing providers and governmental health, mental health, and service agencies.

The City of Trenton regularly communicates with the providers of affordable housing including the Trenton Housing Authority, providers of assisted housing and various social service agencies that provide supportive housing resources to the population requiring mental health assistance. Through this communication and collaboration,



the City has been able to identify and apply for complimentary funds to address the identified needs of the homeless and mental health populations.

69. Describe efforts in addressing the needs of persons that are chronically homeless with respect to the preparation of the homeless strategy.

The Department of Social Services works closely with the various agencies (Rescue Mission, Home Front, Volunteers of America, etc.) in the development of the homeless strategy and its implementation. This is accomplished through periodic group meetings, e-mail alerts about potential funding and the distribution and coordinated review of the draft homeless strategy.

70. Describe the means of cooperation and coordination among the state and any units of general local government in the metropolitan area in the implementation of the plan.

The City of Trenton has a working relationship with the New Jersey Department of Social Services, the Department of Community Affairs and their respective Divisions that are assigned the task of developing, implementing and coordinating a homeless strategy. Being the Mercer County seat, Trenton is also able to coordinate its efforts to deliver assistance to its homeless population with the Mercer County Department of Social Services. Through these cooperative efforts, the City is able to maximize its resources and provide assistance to its homeless population more efficiently.

71. Describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the jurisdiction's economic development strategy.

The City of Trenton, Department of Housing & Economic Development is the primary agency that develops, coordinates and implements the City's economic development strategy. The successful development and implementation of the strategy requires coordination with a multitude of private and public agencies. The Division of Economic Development accomplishes this through a variety of committees, task forces and events.

We operate an annual Trenton Business Week where we hold a series of workshops for local businesses to improve their operations, learn about training and financial assistance for their businesses and receive free consultations from business development experts.

The Division also works closely with the New Jersey Department of Economic Development and their Urban Enterprise Zone Program to enhance the business climate in the City of Trenton by promoting various State resources available to local business to reduce their expenses and improve their operations.

The City also works closely with the Mercer County Department of Economic Development, attending its annual Economic Development Summit and partnering with them on a number of business initiatives with private industry, social service and job training agencies and developers.

72. Describe the jurisdiction's efforts to coordinate its housing strategy with its transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

The City's Divisions of Planning and Housing Production recognize the benefit of aligning affordable housing with access to public transportation. To that end the City has produced a map of City properties and NJ Transit public transportation routes. This document helps us to refine our affordable housing strategy to promote potential development sites that are located on or within close proximity to public transportation.

## **Monitoring 91.230**

73. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

### Monitoring for CDBG and ESG

The Department of Health and Human Services will monitor sub-recipients of CDBG Public Services and ESG funds by conducting annual site visits, client interviews, maintaining working relationships, and regular interaction with subject agencies. Sub-recipient agencies are required to submit expenditures reports and annual accomplishments reports. The Department of Health and Human Services is responsible for contracting with and monitoring the day-to-day operation of the City's emergency shelters, and transitional and supportive housing projects. The Department of Housing and Economic Development will monitor the housing rehab activities. In order to ensure that CDBG and ESG staff are properly informed of monitoring procedures and expectations, the City will conduct regular in-house training sessions for program monitors.

### Monitoring and Inspections for the HOME Program

The City of Trenton was designated by HUD as a Participating Jurisdiction to annually receive HOME Investment Partnership (HOME) funds. Consequently, the City of Trenton is responsible for monitoring compliance to ensure that HOME funds are used in accordance with all program requirements and for taking appropriate action when performance problems arise. City staff in the Divisions of Housing Production and Planning, under the supervision of the Director of the Department of Housing and Economic Development is responsible for oversight of the different housing development strategies incorporated in the Consolidated Plan. Within the Department, the Division of Housing Production is responsible for the overall coordination of housing activities, including determining the extent of financial assistance, implementation and monitoring. The Division is required to monitor and inspect HOME-assisted units for compliance with program rules.

The major monitoring compliance requirements for the HOME Program are: Project Eligibility, Household Eligibility and Recordkeeping. In addition, rental housing projects also must be subject to on-site inspections to ensure compliance with property standards, rent limits and occupancy requirements. The rule requires a review of a "sufficient sample" of units and files to make a reasonable determination

of compliance. The frequency of onsite file reviews and unit inspections is specified by the regulation:

- Projects with less than 5 total units (not HOME-assisted units) must be visited at least every three years
- Projects with 5 to 25 total units must be visited at least every two years
- Projects with more than 25 total units must be monitored annually onsite

Trenton has old housing stock, which means that rehabilitation and conversions play a critical role in all efforts to expand the supply of affordable housing. The city has revised its rehabilitation standards per the HOME requirements at 24 CFR Part 200.925 or 200.926 to reflect the requirements of the New Jersey Rehabilitation Subcode. The City of Trenton Housing Monitoring Form is used for monitoring. The goals of the inspection process are: to ensure the property remains operationally efficient; is competitive within the marketplace; and is of the highest quality housing for the targeted population, and that maintenance, repair and capital improvements are made when necessary.

The City's monitoring responsibilities with respect to project eligibility are to use HOME Funds to develop and support affordable rental housing and homeownership through:

1. Acquisition of rental and/or homeownership housing (including assistance to home buyers);
2. New construction, reconstruction, or moderate or substantial rehabilitation of non-luxury ownership and/or rental housing with suitable amenities; *and*
3. Tenant-based rental assistance, including security deposits.

The City's monitoring responsibilities with respect to Household Eligibility are: All HOME-assisted units are required to be occupied by low income (LI) households. Low income is defined as 80 percent of the applicable area median income, adjusted for family size, as determined by HUD. In the case of rental projects with five or more HOME-assisted units, at least 20 percent of the HOME-assisted units must be occupied by very low income (VLI) households. Very low income is defined as 50 percent of median. Annual income is based on the gross income of the household.

- For rental housing - The City of Trenton uses the guidelines of the HUD Section 8 Program in computing a household's annual income as defined in 24 CFR Part 813.
- Homebuyer & Owner-Occupied Housing -The City of Trenton uses the IRS 1040 method in computing income.

The determination of an applicant's income eligibility and eligibility as a family is done within six months of the time at which the applicant receives assistance or occupies the unit. For rental housing, family income and family size must be determined annually for the compliance period. Additionally, income must be verified at time of application or certification. Verification can be done with third party written documents, written notes of third party conversations, or first-hand documentation provided by the recipient. For rental housing, verification of income is required when a tenant first occupies a unit, and every sixth year

thereafter during the compliance period. In interim years, a tenant certification is sufficient. .

For the City of Trenton's homeownership program, loan underwriting criteria comes into play. Loan qualification is coordinated with the timing of income certification to ensure that unnecessary certifications do not occur. The lending criteria are established by participating lenders and are reasonably related to the buyer's ability to undertake homeownership responsibilities and repay the loan. The City of Trenton also pays close attention to the conflict of interest provisions at 92.356 and standards set forth in the Local Government Ethics Law at N.J.S.A. 40A:9-22.1, et seq. Specifically, the Code of Ethics for local officers and employees set forth at N. J.S.A. 40A:9-22.5 and N. J.S.A 40:69A-163

The City's monitoring responsibilities with respect to recordkeeping include maintaining program records for the retention period (§954.400 to §954.402) and other federal requirements (§954.4) that apply for the duration of the period of affordability, as well retained for three years after the required period of affordability specified in §954.306 or §954.307, as applicable or three years after closeout of the funds including refinancing guidelines, and evidence that housing projects meet subsidy layering guidelines. All HOME sub recipients are required to establish a record keeping system that will make it easy to confirm that program regulations are being met including HOME rent levels and utility allowance calculations. If HOME-assisted units are floating, the owner must clearly document how the HOME occupancy targets are being met (i.e. rental logs that show that HOME-assisted units were properly replaced).

Files will document that each HOME-assisted unit is occupied by an income-eligible tenant and will include the tenant's application, initial income verification, subsequent annual re-certifications and the tenant's lease. The owner will also be required to develop a tenant selection policy which describes the procedure for reviewing applications for housing, criteria to identify eligible tenants, create waiting lists from which tenants will be selected and provide prompt written notification of rejections. In regard to affirmative marketing and tenant selection policies, property owners will be required to document compliance with Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) including incorporating the Fair Housing logo on all advertising. Property owners will be required to affirmatively market HOME-assisted units in English and Spanish, and to maintain documentation as to the effectiveness of marketing activities. The owner will be required to demonstrate how corrective actions will be taken in the event requirements are not met.

## **Housing Opportunities for People with AIDS (HOPWA)**

\*Refers to the HOPWA Table in the Needs.xls workbook.

74. Describe the activities to be undertaken with HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living.

Does not apply to Trenton

75. Identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.

Does not apply to Trenton

76. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

Does not apply to Trenton

77. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).

Does not apply to Trenton

78. Provide an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.

Does not apply to Trenton

79. Describe the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.

Does not apply to Trenton

## Specific HOPWA Objectives

80. Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables\* prescribed by HUD.

*Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.*

Does not apply to Trenton

81. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Does not apply to Trenton

## OTHER NARRATIVES AND ATTACHMENTS

82. Include any Strategic Plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

### The City of Trenton's Brownfields Program

The City of Trenton's highly industrialized history, has left a significant number of abandoned factories requiring environmental cleanup, including formerly nationally significant pottery, rubber and wire rope industries. These sites provide significant obstacles to the urban redevelopment process, through stigma, liability and costs associated with actual or potential environmental contamination. Such environmental contamination, even at low levels and small quantities, can deter the private sector from undertaking urban redevelopment projects at their own risk, especially in urban areas where land values are often quite low relative to surrounding communities. Brownfields are properties, often formerly used for industrial or commercial purposes, where land values and development potential are negatively impacted by the existence of, or mere perception of, environmental contamination.

In the early 1990s, the City of Trenton began to take on the liabilities in order to allow specific redevelopment projects to proceed. Many of Trenton's brownfield sites were former industrial properties, whose owners "walked away", forcing the city to take ownership through tax foreclosure. Taking these brownfields sites on was a big decision, but one that had to be made or these sites would continue to remain a severe blighting influence on neighborhoods while contributing nothing to our extremely limited tax base (owing in part to the significant amount of tax exempt properties in the city). The decision was, in part, influenced by some liability relief offered to innocent parties through new state and federal programs being developed to help cash strapped communities deal with brownfields sites.

In 1995, the Trenton was one of the first cities in the nation to receive a \$200,000 grant from the US Environmental Protection Agency to initiate a brownfields program, inventory and prioritize sites, and conduct community outreach on brownfields matters. The initial \$200,000 "USEPA Assessment Pilot Grant"

concentrated on four brownfields sites in the city. Since that time, more than \$20,000,000 in State and Federal grant and revolving loan funds have been leveraged for assessment, investigation, cleanup and related activities at numerous sites in the city. From the four initial sites, we now count over 100 properties that have been addressed by the brownfields program. Some sites have been remediated and/or administratively closed, while many others are in various states of assessment, investigation and remediation.

Trenton's Brownfields Program maintains a record of accomplishments and produces metrics information to gauge the success of the program. The following metrics are routinely tracked:

- Grants and other funds leveraged (>\$25,000,000)
- Number of brownfields sites redeveloped (41)
- Number of acres of brownfields redeveloped (139) and "in progress" (30)
- Number of brownfields sites redeveloped for retail (4), mixed use (2), commercial (9), industrial (6), public (13), open space (5) and residential use (10)
- Number of housing units constructed on brownfields sites (411)

Trenton is one of the very few municipalities under 100,000 in population that has a full time Brownfields Coordinator. The Brownfields Coordinator, working in the Division of Economic Development, is responsible for managing the Brownfield Program and Brownfield-related grants. The salary for the Brownfields Coordinator has been funded from several funding sources including various USEPA grant funds and CDBG funds.

Trenton has extensive experience in hiring qualified firms to provide actual site work, and hires environmental planning consultants when necessary to supplement the project management capabilities of in-house staff.

Community involvement is facilitated, in part, through the Brownfields Environmental Solutions for Trenton (BEST) committee, a stakeholder group established in 1996 as a component of Trenton's original brownfield assessment grant. This interdisciplinary committee meets regularly, has been in existence since 1996, and provides advice to Trenton on the City's brownfield program and projects.

#### The City of Trenton's Urban Enterprise Zone

The Trenton Urban Enterprise Zone (UEZ) Program began in 1985, when the City obtained UEZ designation by the State of New Jersey through a competitive process.

Currently, the Trenton UEZ has over 140 businesses participating in the program. These businesses receive approval to participate from the New Jersey Commerce Commission and the New Jersey Division of Taxation and include a variety of professional, retail, manufacturing, financial, and service firms.

Since its inception, the program has served over 725 businesses. These companies have collectively invested over \$565 million in the construction of new office space, sports complexes and retail space; in the rehabilitation of commercial and industrial space; and in the purchase of equipment. The Trenton UEZ businesses have created over 1,250 full and part time jobs in a variety of administrative, professional, retail, craft, clerical, and manufacturing occupations.

From large to small businesses, the Trenton UEZ has provided a tax savings to its certified participants and has offered tax savings to patrons that enter its stores. In addition, the Trenton UEZ has been a major catalyst in attracting companies to consider Trenton as their home. Through the support of the UEZ, the City of Trenton has opened its doors to a new Wachovia headquarters, a medium sized architectural firm – Clarke Caton and Hintz, and a downtown hotel – The Trenton Marriott. These projects have helped to produce economic revitalization in the heart of New Jersey's Capital City.

83. Attach copy of CHAS Housing Needs Data Tables from:  
<http://socds.huduser.org/scripts/odbic.exe/chas/index.htm>

84. Section 108 Loan Guarantee

If the jurisdiction has an open Section 108 project, provide a summary of the project. The summary should include the Project Name, a short description of the project and the current status of the project, the amount of the Section 108 loan, whether you have an EDI or BEDI grant and the amount of this grant, the total amount of CDBG assistance provided for the project, the national objective(s) codes for the project, the Matrix Codes, if the activity is complete, if the national objective has been met, the most current number of beneficiaries (jobs created/retained, number of FTE jobs held by/made available to LMI persons, number of housing units assisted, number of units occupied by LMI households, etc.)

Does not apply to Trenton

85. Regional Connections

Describe how the jurisdiction's strategic plan connects its actions to the larger economic strategies for the metropolitan region. Does the plan reference the plans of other agencies that have responsibilities for metropolitan economic development, transportation, and workforce investment?

Recently, two similar reports described housing market conditions at the national and state level. The findings of these two studies are presented below, as context for understanding Trenton's housing market in 2010 and its future challenges and opportunities. If accurate, these reports portend an increased interest and locational benefit to living and working in Trenton.

#### Nation's Workers Priced Out of Homeownership and Rental Units

The Center for Housing Policy released its new *Paycheck to Paycheck: Wages and the Cost of Housing in America* study on 3/23/10.

"Even as home prices and interest rates have dropped over the past year and the income needed to purchase a median-priced home has dropped in 93 percent of the 208 homeownership markets studied



between 2008 and 2009, many workers are still unable to buy a median-priced home. And these are people our communities depend upon: Police officers can't afford to buy a median-priced home in 86 of the 208 markets, elementary school teachers in 83, licensed practical nurses in 146, janitors in 202, and retail salespeople in 207.

"On the rental side, the rent for a two-bedroom apartment rose in 89 percent of the 210 markets studied. Retail salespeople are priced out of every market, and janitors can afford a two-bedroom apartment in only one of the 210 rental markets. Licensed practical nurses are unable to rent a two-bedroom apartment in 55 of the markets, police officers in 12, and elementary school teachers in 11.

"Housing affordability continues to be a struggle for many Americans, and it doesn't seem to be improving much year over year.

(Excerpted from AFFORDABLE HOUSING FINANCE Update, 3/24/10)

### Demographic Changes in New Jersey May Mean Big Redevelopment Opportunities

- In 1985, half the homebuyers in New Jersey were families with children. By 2009, this number had dwindled to about one in three. By 2025, it is estimated that only 25 percent of New Jersey homebuyers will be families with children, while 50 percent will be single-person households.

- Smaller families and single homebuyers will seek smaller, less expensive homes near jobs and transportation, according to Mr. Otteau. They will "trade their cars for lifestyles," shifting their demand from drivable commutes to walkable communities.

- In the opinion of Jeffrey Otteau, president of the Otteau Valuation Group, New Jersey is particularly well situated to take advantage of this trend. The state's comprehensive rail system is a unique asset, creating opportunities for growth along transit corridors. A "rental rebound" may generate redevelopment of many of the state's urban centers and older inner suburbs.

"It has become an article of faith in New Jersey that towns do not want residential development because more homes mean more schoolchildren-and more schoolchildren mean higher property taxes. But Mr. Otteau's assertion that three out of every four homebuyers 15 years from now will be childless, thus "deconstructing the school enrollment myth," should cause municipal officials and planners to rethink their master plans and zoning ordinances. The reduced school enrollment trend can already be seen in some communities.

"Meanwhile, the state's baby boomers, most of whom have not put away enough money for retirement (and will therefore be reduced to lower socioeconomic status), are starting to move into retirement

communities or downsized homes and apartments. This bodes ill for the state's luxury housing market, glutted with large-lot McMansions that smaller families don't want and less affluent families can't afford.

"For those who might conclude from these facts and figures that New Jersey's glass is half-empty, however, Mr. Otteau posited that the glass may instead be half-full. The same trends that bedevil the state's sprawling suburbs, he noted, may benefit its urban and town centers.

"Housing demand in the future will seek efficiency, Mr. Otteau predicted, in the form of smaller, less expensive design. Concern about energy costs will cause people to seek homes and apartments near jobs and transportation. Downtowns and transit-oriented developments will deliver these efficiencies. Office markets will shift to transportation hubs, creating a direct linkage to job retention and growth. And retail markets will "follow the money."

(Excerpted from New Jersey Future Facts, 3/25/10)

The City of Trenton's 2010 Five Year Consolidated Plan takes the observations above into account. We believe Trenton's ability to capture the opportunities described in these recent reports will depend upon creating a 24/7 downtown presence, with complimentary services available after 5 pm and on the weekends that meet the needs of residents of all income levels. To this end, the city has embarked on an ambitious plan to redevelop the train station area into a key transit village. This plan includes the revitalization of the THA's Miller Home and the surrounding neighborhood with HOPE VI funds and the development of three major mixed-use projects; a combined total of \$374 million of LEED-certified offices, retail space and housing within a mile of the train station totaling an excess of \$745 million over the next 4 to 5 years.