

City of Trenton

2025 – 2029 Consolidated Plan and 2025 Annual Action Plan

July 1, 2025 – June 30, 2030

DRAFT FOR PUBLIC REVIEW

COMMENTS WILL BE ACCEPTED FROM JUNE 27, 2025 – JULY 28, 2025

**Public Hearing will be held on July 7, 2025 at 5:30 p.m. located at City Hall,
319 E. State St. Trenton NJ 08608 or virtually via:**

<https://meet.goto.com/588810029>

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Department of Health & Human Services and Mullin and Lonergan Associates



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Executive Summary

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

1. Introduction

The City of Trenton, NJ Five-Year Consolidated Plan (Con Plan) is mandated by federal law and regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income persons. This Con Plan consolidates into a single document the planning and application requirements for the federal Community Development Block Grant (CDBG) program, HOME Program and Emergency Solutions Grant (ESG) Program.

Con Plans must be prepared and submitted to HUD every three to five years. The City of Trenton uses a five-year Con Plan cycle and has a program year beginning July 1. This plan covers fiscal years 2025 – 2029.

The purpose of the Con Plan is to:

- Assess the City's affordable housing and community development needs
- Analyze the City's housing markets
- Articulate the City's priorities, goals, and strategies to address identified needs, and
- Describe the actions the City will take to implement strategies for affordable housing and community development.

The Con Plan for FY 2025 – FY 2029 provides data on trends and conditions related to the City's current and future affordable housing and community development needs. The analysis of this data has been used to establish priorities, strategies, and actions that the City will undertake to address these needs over the next five years. Annually, the City will develop its Action Plan in which it will describe the planned investment of federal resources to implement specific activities.

The primary federal funding resources in the 2025-2029 Consolidated Plan are the following:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- Emergency Solutions Grant (ESG): The Emergency Services Grant program became the Emergency Solutions Grant program under the Hearth Act of 2009. Recognizing the need to end homelessness, the Hearth Act places more emphasis on homeless prevention and rapid re-housing and less on shelters and transitional housing. ESG funding can be used to support traditional shelters, transitional housing that is grandfathered from 2010 funding, supportive services, rent and utility payments and security deposits to prevent homelessness or to rapidly re-house homeless individuals and families, street outreach, and oversight of a homeless management information system (HMIS).

The City of Trenton anticipates receiving the following grant amounts in fiscal year 2025 and over the timeframe of the Five Year Plan.

FY 2025 CDBG:	\$2,527,173	Five Year Estimate: \$ 12,635,865
FY 2025 HOME:	\$ 909,830	Five-Year Estimate: \$ 4,549,153
FY 2025 ESG:	\$ 235,430	Five-Year Estimate: \$ 1,177,150

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The five-year Consolidated Plan identifies six goals, along with corresponding objectives and strategies, to address the City of Trenton's housing and community development needs. These goals are summarized as follows:

HOUSING

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

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

BLIGHT REMOVAL

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

IMPROVE PUBLIC INFRASTRUCTURE

The City of Trenton will:

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

IMPROVE PUBLIC FACILITIES

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

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

SUPPORT PUBLIC SERVICES

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

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

PREVENT HOMELESSNESS

Funds will be provided to local community organizations through a competitive grant process that will be used to help prevent and reduce homelessness by:

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

3. Evaluation of past performance

The following evaluation of past performance is from the Program Year 2022 Consolidated Annual Performance and Evaluation (CAPER) Report. In 2022, the City of Trenton expended close to \$1,816,401.01 in public facilities, services, homeless prevention, and economic activities. The City of Trenton reprioritized responding to new, as well as ongoing needs of the community.

The City of Trenton's Community Development Block Grant (CDBG) Program, HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) Program offered comprehensive assistance to extremely low, very low, and low-income persons and families with a variety of housing opportunities, social services, recreational opportunities, and financial assistance. In addition, the City's Emergency Solutions Grant was utilized to assist the homeless or those at risk of homelessness. The City continued its First-Time Homebuyer program and the Housing Rehabilitation Program. The City continues to fund its Senior Citizen Program operational needs. Several public facility-projects were stalled due to the escalating project costs or are currently under construction.

4. Summary of citizen participation process and consultation process

The City of Trenton developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, and stakeholder meetings. A complete summary of Citizen Participation, including comments, is included in the Citizen Participation Appendix attached to this Plan.

5. Summary of public comments

There were no comments received.

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

There were no comments that were not accepted by the City. A complete summary of Citizen Participation is included in the Citizen Participation Appendix attached to the final version of this Plan.

7. Summary

This plan outlines the goals for the City of Trenton's CDBG, ESG, and HOME funds. Following extensive outreach and public input, the Consolidated Plan and Annual Action Plan clearly outline programs and activities that will address the identified needs. Despite the number of needs identified by stakeholders and the public, the City's CDBG and HOME programs are limited in funding. This document outlines the City's plans to maximize the investment of federal resources.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	TRENTON	Dept. of Health and Human Services
HOME Administrator	TRENTON	Dept. of Health and Human Services
ESG Administrator	TRENTON	Dept. of Health and Human Services

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

City of Trenton
Department of Health and Human Services
319 East State Street - 3rd floor
Trenton NJ 08608
Phone: (609) 989-3332
cminacapelli@trentonnj.org
Business Hours; 8:30 am – 4:30 pm, Monday through Friday

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

To maximize citizen participation, staff conducted outreach through a series of public notices, online surveys, meetings, and hearings. These outreach efforts were designed to duly record stakeholder input and develop an informed set of priority needs to help guide the City's investment strategies throughout this Consolidated Plan. As part of these efforts, low- and moderate-income residents, as well as service providers, were encouraged to provide input on the Consolidated Plan and Annual Action Plan. These survey responses, as well as the input provided during public hearings, were incorporated into this document.

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

The City of Trenton works closely with the Trenton Housing Authority (THA). THA in partnership with the City is the grant recipient of a HUD Choice Neighborhood planning grant. Through the Choice Neighborhood planning grant, THA is expanding affordable housing opportunities in North Trenton. THA is currently completing several RAD conversion projects of former public housing developments. Most notably Donnelly-Homes in the North Trenton Battle Monument area is being converted into a mixed-income community. The City has also provided grant funds to THA for public housing modernization in previous program years.

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

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

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

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

The City of Trenton Health and Human Services Department administers the programs of the Continuum of Care (COC) and works with the Executive Committee to develop the funding plan for the use of ESG

funds as well as the development of the performance standards, outcome measures, and policies and procedures.

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

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

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

1	Agency/Group/Organization	City of Trenton DEPARTMENT OF HEALTH AND HUMAN SERVICES/COC
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Department HHS is the lead on the COC. Several member agencies attended the stakeholder meetings. The COC Executive Committee, which includes the Health and Human Services Director and the ESG lead was consulted through this process. Consultation will result in better coordination between the grants programs.
2	Agency/Group/Organization	Trenton Housing Authority
	Agency/Group/Organization Type	PHA

	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy PHA Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through the stakeholder process, virtual interviews, and follow-up conversations, as necessary. The City and THA have collaborated on several projects and will continue to do so through the Choice Neighborhood Planning Grant.
3	Agency/Group/Organization	PROJECT FREEDOM, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended various meetings and we continue to have dialogues to discuss needs.
4	Agency/Group/Organization	HOMEFRONT - TLC, INC.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended various meetings and we continue to have dialogues to discuss needs.
5	Agency/Group/Organization	Trenton Health Team
	Agency/Group/Organization Type	Other Government- local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended various meetings and we continue to have dialogues to discuss needs.
6	Agency/Group/Organization	Homeworks Trenton
	Agency/Group/Organization Type	Services- Children Services- Education
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative of agency attended stakeholder meetings.

Table 2 – Agencies, groups, and organizations who participated

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

No organization or any type of organization was excluded from participation in the analyses or preparation of the report.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Trenton	The goals of the COC were used in the development of the Strategic Plan. The City is the lead agency in both processes so the goals are the same.
Trenton 250 Plan	City of Trenton	The Comprehensive Plan directs growth in the City and is used to inform location decisions for housing projects
Mercer County Multi-Jurisdictional Hazard Mitigation Plan	Mercer County Office of Emergency Management	The Strategic Plan implementation will acknowledge the HMP goals and not place new housing in the flood plain or vulnerable sites.
Local Area Plan for the Workforce Innovation and Opportunity Act July 1, 2023, Modification	Mercer County Workforce Development Board	This plan identified local needs and initiatives for employment
Comprehensive Economic Development Strategy 2024 - 2028	Delaware Valley Regional Planning Commission (DVRPC)	This plan identified local needs and initiatives for employment

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

There were no agencies that the City purposely did not consult. Various service providers were invited to participate in stakeholder consultations.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

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

Public meetings were held to encourage input from residents especially from low- and moderate-income neighborhoods, public housing, assisted housing, and non-English speaking residents. The first meeting was held on March 26, 2025, to inform local agencies about the funding opportunity and how to apply for FY 2025 funds. An advertisement in the newspaper as well as email notices were sent to agencies providing notification of the meeting date. These notices were emailed in English and Spanish. The English language advertisement contained information on obtaining the information in Spanish.

Subsequent emails to the City’s CDBG email list serve, provided the schedule of other important stakeholder meetings and flyers were sent in English and Spanish for posting and distribution by the public service agencies. The City also published informational flyers to all of its social media platforms.

There were several meetings held to provide an opportunity to comment on the City’s needs and then the Consolidated Plan and the Annual Plan. The meeting dates were published in English and Spanish publications. The English language newspaper included a statement that should it be requested; the plan would be provided in a way that it could be translated to Spanish and/or an accessible format for those who were visually impaired. Public service agencies are the best way to communicate with the lower-income community at large who might not subscribe to or read the local newspapers.

An online citizen survey was created and publicized throughout the community on public needs as it relates to the use of CDBG, ESG, and HOME funds. This survey was made available in English and Spanish.

Comments and concerns raised during the citizen participation process were taken into consideration when developing the Consolidated Plan’s goals, objectives, and strategies. The Consolidated Plan is a collaborative process that involves interviews with stakeholders and meetings with the public to determine areas of need. As part of this process, the City sought to identify the priority needs and strategies to address those

needs. Priority needs were identified based on available housing data, public input, service provider meetings, community surveys, and past program performance. In addition, staff consulted with various other governmental and quasi-governmental agencies and stakeholders to identify priority needs and develop corresponding strategies.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
Public Meeting	Applicants	Technical assistance meeting is well advertised and promoted for groups wishing to make an application for funds. See appendix	N/A	N/A
Public Meeting	Non-targeted/broad community	Public Needs Hearing and Technical Assistance Meeting held at the Trenton City Hall on March 26, 2025 4 attendees	A summary of comments received is included in the Unique Appendix	All comments were accepted and incorporated in this Plan.
Stakeholder meetings	Non-targeted/broad community	Virtual stakeholder interviews held between March 26 – 28, 2025	A summary of comments received is included in the Unique Appendix	All comments were accepted and incorporated in this Plan.

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	Ads were purchased announcing the Meetings and Public Hearings Emails and flyers were sent to community groups and the City's email list service. Flyers were distributed thru stakeholders and posting in public spaces. All communication was presented in English and Spanish.	N/A	N/A
Community Survey	Non-targeted/broad community Non-English Speaking - Specify other language: Spanish		The survey informed many of the needs and goals presented in the plan. A survey summary is included in the Unique Appendix	See the Appendix for survey results.
Public Meeting	Speaking - Specify other language: Spanish Non-targeted/broad community			

Table 4 – Citizen Participation Outreach

Table 5 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The needs assessment is based on analyzing housing problems across the City of Trenton by income level among renters, owners, and households with special needs. Additionally, needs were identified through a public outreach process that included stakeholder consultations/interviews and public meetings.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of 2016-2020 American Community Survey (ACS) data from the Census Bureau. The CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities, as well as cost burden, which occurs when a household pays more than 30% of its gross income on housing costs. Severe cost burden occurs when a household pays more than 50% of its gross income on housing costs.

Supplemental data were drawn from the 2019-2023 ACS 5-Year Estimates and other sources to provide additional context were needed.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The ACS data below shows that while the area median income in Trenton has increased, rental housing costs have risen, heightening the need for affordable housing options. Between 2009 and 2020, the median income for residents of the City of Trenton increased by 9% after adjusting for inflation, while median rent rose by 19% after adjusting for inflation. The median home value decreased by 21% after adjusting for inflation during this same period. This means that although, statistically, income has increased for some residents in Trenton, housing costs still consume a relatively large share of income, particularly for renter households. While homeownership is more affordable in Trenton, the high cost of rent makes it challenging for renters to save for an eventual down payment. Given the lack of decent, affordable housing options, the area's lower-income households often must choose between deficient, substandard housing and being burdened by costs.

As the data below show, the most significant housing issues identified are cost burden and severe cost burden. Cost burden is defined as spending over 30% of household income on housing costs, such as mortgage and rent payments. According to CHAS data, 45% of households in the City are cost-burdened. Similarly, being severe cost burden is defined as spending over 50% of household income on housing. In Trenton, 17.2% of households are severely cost-burdened. The cost burden is greatest among renter households earning less than 50% of HAMFI. Please note that HAMFI refers to "HUD Adjusted Median Family Income," which is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes such as a simple Census number due to a series of adjustments that are made. Where the HUD tables below report AMI (Area Median Income), they refer to HAMFI.

In general, small family households have less difficulty in affording housing costs than other household types. Elderly non-family households have the greatest difficulty finding affordable housing. With regard to other housing problems, overcrowding is the second most common problem particularly among renter households earning below 80% HAMFI.

The following are HUD-generated tables using 2016-2020 CHAS data that are part of the Consolidated Plan tool. These tables are automatically generated when creating the Consolidated Plan.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	84,630	83,385	-1%
Households	27,845	28,580	3%
Median Income	\$34,257.00		8%
	(\$40,342.60 in 2023 dollars)	\$37,002.00	9%

Table 6A- Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Housing Cost Table (SUPPLEMENTAL)

Housing Values	Base Year: 2009	Most Recent Year: 2023	% Change
Median Home Value	\$131,000 (\$154,271.54 in 2023)	\$122,500	-6.4% (-20.5% adjusted)
Median Contract Rent	\$746 (\$878.52 in 2023)	\$1,045	+40% (+18.9% adjusted)

Data Source: 2016-2020 5-Year ACS (B25077, B25058), 2019-2023 5-Year ACS (B25077, B25058)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	11,190	5,065	4,460	3,285	4,585
Small Family Households	3,385	1,940	2,165	1,460	2,055
Large Family Households	945	700	735	320	570
Household contains at least one person 62-74 years of age	2,515	1,045	850	920	1,195
Household contains at least one person age 75 or older	1,265	455	555	195	360
Households with one or more children 6 years old or younger	2,075	960	845	620	660

Table 7 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	140	40	20	75	275	15	0	15	20	50
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	195	70	75	105	445	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	210	140	195	75	620	4	70	20	20	114
Housing cost burden greater than 50% of income (and none of the above problems)	5,515	580	20	0	6,115	920	405	65	20	1,410

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	1,185	1,865	355	20	3,425	300	505	395	145	1,345
Zero/negative Income (and none of the above problems)	720	0	0	0	720	130	0	0	0	130

Table 8 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	6,060	835	310	255	7,460	940	475	100	65	1,580
Having none of four housing problems	3,440	2,565	1,890	1,070	8,965	750	1,195	2,160	1,900	6,005
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 9 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,405	1,035	140	3,580	340	230	270	840
Large Related	810	445	0	1,255	45	85	50	180
Elderly	1,870	350	100	2,320	720	410	115	1,245
Other	2,105	740	155	3,000	119	230	45	394
Total need by income	7,190	2,570	395	10,155	1,224	955	480	2,659

Table 10 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	225	225	300	120	0	420
Large Related	0	0	70	70	20	60	0	80
Elderly	1,425	70	0	1,495	485	110	35	630
Other	0	1,675	220	1,895	115	0	0	115
Total need by income	1,425	1,745	515	3,685	920	290	35	1,245

Table 11 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single-family households	350	135	135	120	740	0	55	20	10	85

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	40	54	125	60	279	4	15	0	10	29
Other, non-family households	15	25	15	0	55	0	0	0	0	0
Total need by income	405	214	275	180	1,074	4	70	20	20	114

Table 12 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 13 – Crowding Information – 2/2 (TABLE DID NOT POPULATE)

Describe the number and type of single-person households in need of housing assistance.

According to 2023 American Community Survey (ACS) data, 35% (11,347) of householders in the City of Trenton are single-person households. These households make up 34% of renter households and 22% of owner-occupied households. ACS data shows that while the median household income for Trenton in 2023 was \$47,102 the median income for a single-person household in 2023 was \$21,754. As this is roughly 46% of the City's 2023 median household income, it can reasonably be assumed that there are a significant number of single-person households experiencing difficulty finding affordable housing, and points to a need for additional studio and one-bedroom units to accommodate this group. Stakeholder interviews note that much of the housing being built is geared toward families with little to none being created for singles or persons wanting to rent a smaller space.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking.

According to 2023 ACS data, the disability rate in the City of Trenton was 13.8% (12,069) in 2023. Among individuals who reported living with one or more disabilities, 7.1% reported having an ambulatory disability, 7.0% reported having a cognitive disability, 1.7% reported having hearing difficulty, 2.7% reported having a vision difficulty, and 7.7% reported having an independent living difficulty. Residents

aged 18 to 64 comprise the largest share of Trenton residents living with one or more disabilities. Approximately 59% (7,077) of those living with at least one disability are between 18 and 64 years old. Individuals living with one or more disabilities are more likely to live below the poverty level. ACS data reports that 32.3% of individuals living with a disability lived below the poverty level. This was more than 9 percentage points higher than the citywide poverty rate (22.8%) and more than three times the statewide poverty rate (9.7%).

Particularly affected are those between the ages of 18 and 64 living with a disability (approximately 7,077 residents). Residents within this age group with a disability face a poverty rate of 35.9%. Comparatively, the poverty rate for individuals between the age of 18 -64 without a disability is 20.7%.

What are the most common housing problems?

The CHAS data above indicates that the most common housing issues are housing cost burden and severe cost burden. Both cost burden and severe cost burden are greatest amongst renter households earning below 50% AMI. Trenton's Master Plan, *Trenton 250*, states, "The biggest housing obstacles include an overall suppressed housing market, limited desirable market-rate housing, vacancy and abandonment, a lack of quality affordable housing, and difficulties in maintaining quality housing stock in its neighborhoods." Stakeholder interviews concurred with these findings with several stakeholders reporting cost burden and housing affordability as the greatest issue among low-income households.

Are any populations/household types more affected than others by these problems?

Cost burden and severe cost burden mainly affect renter and owner households in Trenton earning 0-50% AMI with households earning below 30% AMI being the most affected. As household income increases the rate of cost burden declines. Across the income spectrum, elderly, and small related family households (renters and owners) are most likely to experience cost burden and severe cost burden.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Stakeholders report that rent increases coupled with loss of income, evictions, and a limited supply of affordable housing have resulted in an increase in family homelessness. Families are experiencing longer stays in hotels/motels due to the lack of affordable housing. Stakeholders express a need for supportive housing and more vouchers to create affordable housing specifically for families.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Stakeholder interviews reveal that several risk factors for first-time and returns to homelessness include unemployment, substance use disorders, history of evictions, incarceration, mental health diagnoses, low socioeconomic status, and young age with a history of adversity, increase the risk of homelessness. The lowest-income households also have the highest concentrations of minorities who experience challenges accessing healthcare, housing, and services. There remains a strong need for decent, affordable housing.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

HUD defines a disproportionately greater housing need as: a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e., cost burden)

In general, the percentage of households with a housing problem is highest for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, only Asian households earning between 50 and 80% AMI in Trenton experience one or more housing problems at a disproportionate level. It should be noted that there is a small sample size for Asian households so the data may not be reflective of the population at large.

NA-15 - Housing Problems Table:

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more housing problems			
White	81.6%	73.6%	20.0%	17.3%
Black/ African American	75.3%	68.6%	36.4%	23.0%
Asian	82.8%	#DIV/0!	50.0%	0.0%
Hispanic	89.8%	78.3%	34.4%	20.4%
Jurisdiction as a Whole	81.0%	73.0%	34.2%	21.7%

Source: CHAS 2016-2020

Introduction

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,630	1,795	1,095
White	975	220	180
Black / African American	3,830	1,255	650
Asian	120	25	125
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	2,565	290	130

Table 14 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,550	1,315	0
White	545	195	0
Black / African American	1,635	750	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,335	370	0

Table 15 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,310	2,515	0
White	95	380	0
Black / African American	730	1,275	0
Asian	10	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	440	840	0

Table 16 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	440	1,590	0
White	65	310	0
Black / African American	250	835	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	110	430	0

Table 17 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need as: a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing severe housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Severe housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than 1.5 persons per room)
- Housing costs greater than 50% of income (i.e., cost burden)

In general, the percentage of households with a severe housing problem is high for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, the following racial/ethnic groups experience one or more severe housing problems at a disproportionate level:

- Hispanic Households (0% - 30% AMI)

NA-20 – Severe Housing Problems Table:

	0 -30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more severe housing problems			
White	57.3%	26.2%	2.1%	12.0%
Black/ African American	57.7%	19.5%	9.4%	5.5%
Asian	58.6%	#DIV/0!	0.0%	0.0%
American Indian, Alaska Native	0.0%	0.0%	#DIV/0!	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	78.8%	27.6%	12.2%	17.6%
Jurisdiction as a Whole	63.9%	23.5%	9.8%	9.9%

Source: CHAS 2016-2020

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,025	3,400	1,095
White	685	510	180
Black / African American	2,935	2,150	650
Asian	85	60	125
American Indian, Alaska Native	4	15	0
Pacific Islander	0	0	0
Hispanic	2,250	605	130

Table 18 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,145	3,730	0
White	195	550	0
Black / African American	465	1,925	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	470	1,235	0

Table 19 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	375	3,445	0
White	10	465	0
Black / African American	190	1,825	0
Asian	0	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	155	1,120	0

Table 20 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	200	1,830	0
White	45	330	0
Black / African American	60	1,025	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	95	445	0

Table 21 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

HUD defines a disproportionately greater housing need as: a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. Cost-burdened is defined as paying more than 30% of household income on housing and severely cost burdened is defined as paying greater than 50% of household income on housing.

The data table below summarizes the percentage of each racial/ethnic group experiencing cost burden by HUD Area Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI.

Based on these definitions, no racial/ethnic group disproportionately experiences housing cost burden (contributing more than 30% and less than 50% of household monthly income). However, Hispanic households are severely cost-burdened (contributing 50% or more of the household's monthly income on housing) at a higher rate than any other racial or ethnic group at 34.3%. It is also noteworthy that 25.0% of Black/African American households and 32% of Asian households devote more than 50% of the household's income towards housing costs. It should be noted that there is a small sample size for Asian households so the data may not be reflective of the population at large.

NA-25 – Housing Cost Burden:

	Less than 30% (No Cost Burden)	30-50%	More than 50%	No/ negative income (not computed)
Racial/ Ethnic Group		% with housing cost burden		%
White	60.1%	19.5%	20.5%	4.1%
Black/ African American	53.3%	22.2%	24.6%	4.9%
Asian	44.4%	24.1%	31.5%	46.3%
Hispanic	43.9%	21.8%	34.3%	1.7%
Jurisdiction as a Whole	51.3%	21.9%	26.8%	4.2%

Source: CHAS 2016-2020

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,370	5,705	6,970	1,105
White	2,640	855	900	180

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Black / African American	7,235	3,010	3,340	665
Asian	120	64	85	125
American Indian, Alaska Native	0	15	4	0
Pacific Islander	0	0	0	0
Hispanic	3,270	1,625	2,560	130

Table 22 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS
Source:

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The impact of housing problems in Trenton varies primarily by income level. The following income tiers experienced problems at a rate of at least ten percentage points higher than the City as a whole:

Housing Problems

According to the above definitions, only Asian households earning between 50 and 80% AMI in Trenton experience one or more housing problems at a disproportionate level. It should be noted that there is a small sample size for Asian households so the data may not be reflective of the population at large.

Severe Housing Problems

According to the above definitions, the following racial/ethnic groups experience one or more severe housing problems at a disproportionate level:

Hispanic Households (0% - 30% AMI)

Cost Burden

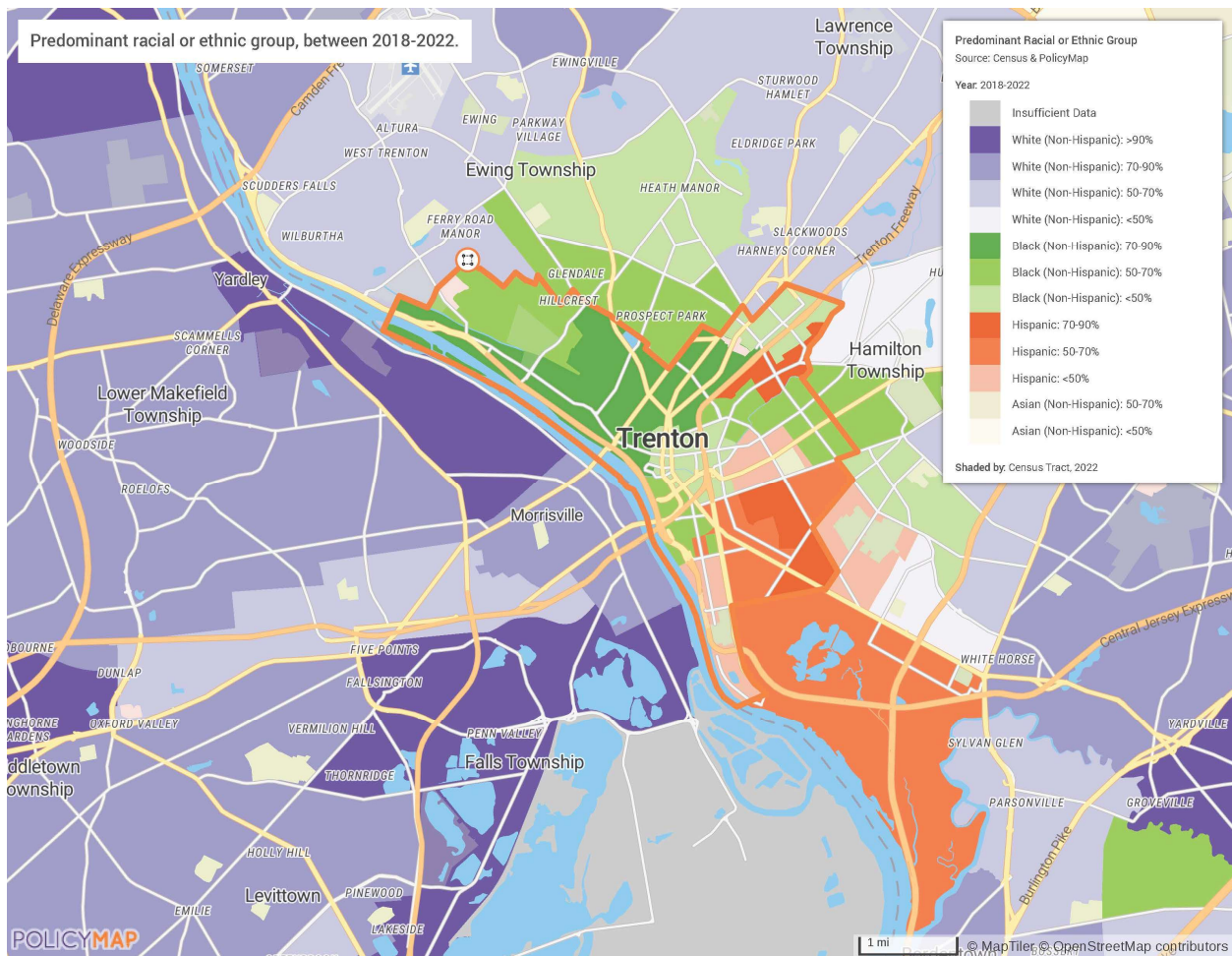
Based on these definitions, no racial/ethnic group disproportionately experiences housing cost burden (contributing more than 30% and less than 50% of household monthly income). However, Hispanic households are severely cost-burdened (contributing 50% or more of the household's monthly income on housing) at a higher rate than any other racial or ethnic group at 34.3%. It is also noteworthy that 25.0% of Black/African American households and 32% of Asian households devote more than 50% of the household's income towards housing costs. It should be noted that there is a small sample size for Asian households so the data may not be reflective of the population at large.

If they have needs not identified above, what are those needs?

The needs among race/ethnicities are indicated above.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The map below from Policy Map indicates areas where specific racial or ethnic groups are concentrated in the City of Trenton. As the map illustrates, racial and ethnic households are highly concentrated within certain areas of the City. Neighborhoods in the western region of the City are 70% or more African American (denoted in Green). Neighborhoods in the City's southeast are 70% or more Hispanic (denoted in Orange).



NA-35 Public Housing – 91.205(b)

Introduction

The Trenton Housing Authority (THA) has 11 housing developments with over 1,700 public housing units. Of those units, 411 are for seniors and people with disabilities. The remaining units are family developments. THA's public housing waitlist has 2,441 applicants and is closed. THA does not operate a housing choice voucher program.

The THA has worked with the U.S. Department of Housing and Urban Development (HUD) on multiple initiatives to increase affordable housing in Trenton. THA is currently working on a mixed-income development using the RAD conversion program to replace the obsolete Donnelly Homes with up to 639 new units utilizing the Choice Neighborhood Planning grant for the North Trenton Battle Monument area.

The below tables were pre-populated by HUD.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,326	0	0	0	0	0	0

Table 23 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,813	0	0	0	0	0
Average length of stay	0	0	8	0	0	0	0	0
Average Household size	0	0	1	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	345	0	0	0	0	0
# of Disabled Families	0	0	343	0	0	0	0	0
# of Families requesting accessibility features	0	0	1,326	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	63	0	0	0	0	0	0
Black/African American	0	0	1,262	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	1	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	48	0	0	0	0	0	0
Not Hispanic	0	0	1,278	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 26 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units are accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

THA meets Section 504 requirements and provides reasonable accommodations when necessary. There are currently 2,441 applicants on THA's waitlist, 45 applicants indicate a need for accessible units on their applications. The most common request for accommodation is for accessibility improvements.

THA's *5-Year PHA Plan* identified improving the quality of assisted housing as a goal for the upcoming program year. The plan seeks to carry out this goal using the following means:

- Refine Standard Operating Procedures to ensure that preventative maintenance and work orders are being performed on time with quality workmanship.
- Implement an aggressive Quality Control Program for work orders and unit reconditioning and rehabilitation.
- Review standard materials list to ensure that the most cost efficient, durable, and aesthetically pleasing materials are being utilized.
- Continue to pursue the conversion of THA properties to a Section 8 Funding platform under HUD's Rental Assistance Demonstration (RAD) program.
- Submit a Transformation Plan for the CHOICE Neighborhood planning grant. This transformation plan in the North Trenton Battle of Monument neighborhood will improve the quality of affordable housing.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The greatest needs of households currently living in public housing continue to be stable, decent living conditions, and access to opportunity, in the form of employment, education, or transportation connections to neighborhood amenities. THA continues to address the most immediate needs of its public housing residents by keeping the maximum number of public housing units available and in good condition. THA is currently in the process of completing RAD conversions at Prospect Village, Frazier Courts, Campbell Homes, and Donnelly Homes. Conversions under RAD will allow THA to complete much-needed rehabs at each property. The City of Trenton and THA were awarded a \$15 million Choice Neighborhood Grant to redevelop distressed homes in the North Ward Battle Monument neighborhood into high-quality mixed-income options. The Choice Neighborhood Grant also seeks to provide residents with services focused on income, health, and education.

In addition to these needs, stakeholders expressed the need for services to address mental health diagnoses and drug addiction amongst the homeless population that squats in vacant units.

How do these needs compare to the housing needs of the population at large

The needs of residents of THA are reflective of the housing needs of the general public. There is a high need for clean, safe, and affordable housing for the general public. 66% of extremely low-income households, both renters and homeowners, experience cost burden.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Trenton is the lead entity for the Trenton/Mercer Continuum of Care (CoC). The State of New Jersey administers a state-wide Homeless Management Information System (HMIS). The Point in Time analysis for 2023 data showed that 65% of all persons who were homeless on the night of January 24, 2023, who were Mercer County residents were from the City of Trenton and 56% of all sheltered persons originating from Mercer County were Trenton residents (Of those counted, 12% of respondents indicated they were from outside the county). The unsheltered count may not have included the place of origin and so the percentage of Trenton residents is unknown.

The overwhelming majority (approximately 95%) of homeless housing and service providers are located in the City of Trenton. Trenton is the most populous and most densely populated municipality in Mercer County. According to the 2023 estimates from the ACS data, 23% of Mercer County residents live in Trenton but over 55% of Mercer County residents that are below the poverty level live in Trenton.

The City of Trenton is the grant recipient for all the HUD Continuum of Care funding through the Supportive Housing Program. It then contracts with subrecipient agencies to provide the required housing and services.

The City of Trenton and the CoC have a valuable partner in the Mercer Alliance to End Homelessness. In 2009 the Alliance spearheaded efforts to shift the CoC's efforts to combat homelessness in Trenton from a sheltering model to a Housing First model. The Alliance has been successful at working with the County Board of Social Services and City's Department of Health and Human Services to leverage significant resources.

POPULATION	Estimate the # of persons experiencing homelessness on a given night	
	Unsheltered	Sheltered
Households with at least one adult and one child	1	112
Households with Only Children	0	2
Households without children	125	249
Chronically Homeless Persons	77	24
Veterans	9	16
Unaccompanied Youth	3	23
Persons with HIV	4	9

HUD, 2023 Point in Time, Trenton/Mercer COC;

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The HUD COC Performance Report provides summary data that describes the categories for each homeless population type:

- number of persons becoming homeless:
- and exiting homelessness each year:
- number of days that persons experience homelessness:
- number of days that persons experience homelessness:

The report on the Point in Time count conducted on January 24, 2023, prepared by Monarch Housing provided data on the following household types: chronic, individuals, families with children, veterans, and unaccompanied youth.

- There were a total of 101 Chronically Homeless persons, representing 14% of the homeless population. More than half of those who were Chronically Homeless (77) were unsheltered on the night of the count.
- Single individuals made up the majority, 76%, of homeless households. The majority of adult only households (49%) were staying in emergency shelter on the night of the count. 33% of adult only households were unsheltered and 18% were staying in transitional housing in 2023.
- There were 113 homeless families with at least one child under the age of 18 and an adult. Of these families, 107 were in emergency shelter, 5 were staying in transitional housing and 1 unsheltered.
- There were 25 homeless veterans representing 5% of the adult homeless population. There were 9 unsheltered veterans on the night of the count.
- There were 3 unaccompanied youth (under age 18) that were staying in shelter.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to the 2023 PITC, there were 113 homeless families with at least one child under the age of 18 and an adult. Of these families, 107 were in emergency shelters, 5 were staying in transitional housing and 1 was unsheltered. Further stakeholders note an increase in family homelessness, specifically in the chronic homeless population.

There were 25 homeless veterans representing 5% of the adult homeless population. Of those who identified as veterans, 9 were unsheltered on the night of the count. Stakeholders report they are working with the State on the *Bringing Veterans Home* initiatives to provide vouchers to end homelessness among veterans.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Within the Trenton/Mercer County Continuum of Care (CoC), persons who identify as Black or African American experienced homelessness at greater rates than the other reporting racial and ethnic groups.

The PITC report compiled by Monarch Housing concluded:

“In comparing the racial breakdown of those experiencing homelessness to the racial breakdown in the general population and those living in poverty, disparate impacts along racial lines are evident. According to the American Community Survey 2021 annual estimates prepared by the Census Bureau, about 385,898 people live in Mercer County, and 9.7% (37,424 persons) of Mercer County residents are living below the poverty line. There is a strong correlation between poverty and homelessness, however, the racial disparities evident in the counted population indicate that poverty alone does not determine who will experience homelessness. The disparity in representation within the population experiencing homelessness as compared to the population experiencing poverty by race point to poverty being an inconclusive indicator of who will experience homelessness. The chart below highlights that race, rather than poverty, appears to be a more predictive indicator of who will experience homelessness. Further analysis is necessary to understand the full scope of risk factors and protective factors for communities experiencing homelessness as they relate to race as an indicator. Within this context it is important to explore the impact of systemic racism on experiences of homelessness, both in terms of who is likely to become homeless, and how systems of care work to end homelessness.”

The PIT report further identified homeless households by type and race as shown below.

Race:	Sheltered:	Unsheltered (optional)
White	141	37
Black or African American	417	86
Asian	13	5
Native Hawaiian/Pacific Islander	5	1
American Indian or Alaska Native	2	1
Multiple races	5	1
Total	364	84
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	105	29
Not Hispanic	478	102

Source: 2023 PITC data, Trenton/Mercer COC

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The Point in Time Count for 2023, collected on January 24, 2023, showed there were 714 persons experiencing homelessness in 489 households.

On the night of the Point in Time Count survey 363 sheltered homeless persons were counted. Of these households, 292 resided in emergency shelters and 71 resided in transitional housing. 56% (235 persons) of sheltered homeless persons were from Trenton.

The Point-in-Time Count survey counted a total of 126 unsheltered persons. 96.2% (125 persons) of the total unsheltered homeless persons in Mercer County were from Trenton.

Stakeholders report that the unsheltered population increased by 31% between 2023 and 2024.

Throughout stakeholder interviews, stakeholders expressed a need for more emergency shelters and street outreach to target the unsheltered homeless in Trenton. Due to the lack of emergency housing options, unsheltered homeless individuals often remain homeless while awaiting housing opportunities.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, persons with developmental disabilities, persons with physical disabilities, and persons with alcohol/other drug addictions. In addition, many persons with such special needs also have very low incomes.

Individuals who have special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs also require supportive services in addition to housing that they can afford. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

Describe the characteristics of special needs populations in your community:

Elderly

According to HUD's Comprehensive Housing Affordability Strategy (CHAS), HUD defines "elderly" as individuals over the age of 62 and "frail elderly" as individuals over the age of 75. In line with demographic trends across the country, elderly residents (those age 65 or older) are a growing segment of Trenton's population. According to the American Community Survey, there were approximately 11,037 residents who were age 65 or older in 2023, representing 12.3% of the population. This proportion of elderly residents increased from 2010 to 2023 accounting for only 8% of the total population in 2010.

Elderly households tend to be vulnerable to a number of housing-related and social issues. Residents who are 65 years old or older tend to live alone at higher rates compared to households of other age groups. 13% of Trenton's elderly residents live alone. Comparatively, the proportion of those living alone for households aged 15 to 34 and households aged 35 to 64 is 7% and 11%, respectively. While only representing around 12.3% of the City's total population, Trenton's elderly residents account for 40% of all single-person households in the City.

Elderly households additionally tend to live on fixed, very low incomes. While Trenton's citywide median household income was \$47,102 in 2023, the median income for elderly households was only \$31,992. 19.5% of those age 65 or older live below the poverty level.

Given the comparatively high proportion of elderly households who reside alone and/or on limited incomes, elderly residents are especially in need of affordable housing options and easy access to service providers. The need to provide community support for these households will increase with the growth of the City's elderly population, who will need varying levels of assistance in order to complete daily routines.

Persons with Disabilities

There were 12,069 persons with disabilities in Trenton in 2023, representing 13.8% of the population. This was above the statewide disability rate of 10.6%. The most common disability among Trenton residents living with a disability was independent living difficulty, defined as having difficulty doing errands alone, such as visiting a doctor's office or shopping, due to physical, mental, or emotional conditions. Living with an independent living difficulty was reported by 4,192 individuals, representing 7.7% of the disabilities reported by the City's residents. Other common disabilities experienced by residents included those living with ambulatory difficulty and cognitive difficulty, respectively making up 7.1% and 7.0% of the disabilities reported by the City's residents.

Those living with one or more disabilities tend to live on fixed incomes and earn less in general compared to the overall population. In Trenton, while the median annual earnings for households living with a disability were \$40,348 in 2023, the median annual earnings for households without a disability was \$34,876. Although individuals with one or more disabilities had higher annual earnings, around 32.3% of them earned below the poverty level, while the poverty rate was approximately 21% for the city's population as a whole.

Suitable housing for this population requires housing options that are accessible, accommodating the household's needs, and moreover affordable. Given the breadth and difficulty of the housing needs for those living with disabilities, the figures above only underscore the struggle that many Trenton residents living with a disability experience in finding and maintaining suitable housing.

Substance Abuse and Addiction

Persons with substance abuse and addiction have very complex housing needs. Often there is mental illness or criminal histories that make housing even more inaccessible. Public and private sources have limited resources to address these needs. On-going case management and counseling are often required to stabilize and maintain housing. Stakeholders report an increase in chronic homelessness amongst individuals experiencing mental health and substance abuse.

Re-Entry Population

Stakeholder interviews identified those recently released from prison as a special needs population that has a difficult time finding housing after release. The Office of Returning Citizens in partnership with both the Mercer County One-Stop Career Center in Trenton and the Fresh Start program hosted by the Trenton Free Public Library provides workforce training and other services to help individuals re-enter the non-institutionalized population. Stakeholder interviews identified poor background/criminal history and underemployment/unemployment as barriers the reentry population faces when looking for employment and housing. The challenge with finding employment and housing often places a parolee at risk of being in violation of their parole which could land them back into prison.

What are the housing and supportive service needs of these populations and how are these needs determined?

The non-homeless special needs populations require affordable and accessible housing. This population has among the lowest income levels and other circumstances that make finding housing more difficult. The types of appropriate housing assistance range from direct financial assistance to accessibility accommodations, wrap-around services, and assisted living. These housing needs were discussed with stakeholders during meetings and follow-up virtual meetings as needed.

Further, the most recent Trenton Community Health Needs and Assets Assessment report produced by the Trenton Health Team in June 2022 provided an overview of the housing and supportive service needs of the population. The report identified Behavioral Health and Trauma; Women and Children's Health; Life Expectancy; and COVID-19 as priority need areas to improve the lives of people living in Trenton.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the New Jersey Division of HIV and AIDS Services, there are 1,526 persons living with HIV/AIDS in Mercer County during 2023. 67% of individuals in Mercer County living with HIV or AIDS are male.

Capital Health-East Trenton provides HIV case management services to individuals infected and affected living or working in the Mercer County area. Case Managers work diligently to assess the unique needs of each client in the program. Referrals are then made to agencies that assist the clients in obtaining housing, food, transportation, medical/dental care, medications, legal issues, and entitlements.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Through CDBG funds, the City of Trenton can fund the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for people with disabilities).

Public Facilities needs include:

- Neighborhood facilities (such as educational centers, parks, recreation centers, and libraries)
- Facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for people with disabilities).

How were these needs determined?

Public facility needs were identified through collecting public input. Consultation with residents was an important component of the process along with consulting service providers and stakeholders. In addition to public meetings, a survey of Trenton residents was promoted to obtain input from people in the community. Also, many reports and studies have been consulted that have been prepared over recent years. These include and are not limited to the Trenton 250 Plan, the City's master plan. In addition, specific neighborhood needs will be identified through the Choice Neighborhoods Planning Grant.

Describe the jurisdiction's need for Public Improvements:

Through CDBG funds, the City can also fund the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance of ADA compliant construction and rehabilitation.

Public Improvement needs include:

- public infrastructure – water and sewer installation, maintenance and ADA compliance construction and rehabilitation, sidewalk, and street improvements, as well as lighting and streetscaping enhancements in low- and moderate-income area.
- Demolition and code enforcement (i.e., blight elimination efforts)

How were these needs determined?

Public improvement needs were identified through collecting public input. Consultation with residents was an important component of the process along with consulting service providers and stakeholders. In addition to public meetings, a survey of Trenton residents was promoted to obtain input from people in the community. Also, many reports and studies have been consulted that have been prepared over recent years. These include and are not limited to the Trenton 250 Plan, which is the City's master plan.

In addition, specific neighborhood needs will be identified through the Choice Neighborhoods Planning Grant.

Describe the jurisdiction's need for Public Services:

Through CDBG funds, the City can fund an array of public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling or rehab, elderly care and programs, and childcare and health services for low- moderate-income households.

Public Services needs include:

- Homeless services
- Education and workforce development programs
- Homebuyer counseling
- Life skills training
- Programs for the elderly
- Childcare for low- moderate-income households.

How were these needs determined?

Public service needs were identified through collecting public input. Consultation with residents was an important component of the process along with consulting service providers and stakeholders. In addition to public meetings, a survey of Trenton residents was promoted to obtain input from people in the community. Also, many reports and studies have been consulted that have been prepared over recent years. These include and are not limited to the Trenton 250 Plan, the City's master plan. In addition, specific neighborhood needs will be identified through the Choice Neighborhoods Planning Grant.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This section of the Consolidated Plan examines existing trends and conditions as they relate to affordable housing opportunities throughout the City of Trenton.

The market analysis identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ideally, Trenton will have a mix of housing types to accommodate households of all types and income levels. The City's investment in housing will be guided by the need to create affordable housing to address the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options with appropriate supportive services where needed.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The housing stock in Trenton is principally single-family (43.6%) and renter-occupied (64.1%). Homeownership in the City is less common than renting. A little more than one-third of Trenton households, about 35.9%, own their own home. Multi-family housing within the City consists mostly of small structures with two to four units rather than large complexes of 20 or more units. These smaller, two- to four-unit structures comprise 20% of the multi-family housing inventory.

The rental vacancy rate in Trenton has remained relatively high throughout the previous decades. According to data from the ACS, the vacancy rate for rental units was 10.8% in 2010. In 2023, the rental vacancy rate saw a 5.8% decrease for a vacancy rate of 5%. Data from the 2023 ACS indicates that 24.8% of all adults aged 18-64 live below the poverty line. This is slightly lower than the poverty rate of 24.7% for the population across the City as a whole. Similarly, for seniors, those age 65 or older, 23.2% live below the poverty level, which is also below the citywide rate. Among children under the age of 18, however, 29.7% live below the poverty line. Additionally, the poverty rate for Trenton residents living with one or more disabilities is 32.3%. The high incidence of poverty among households with children and persons with disabilities underscores the need for affordable housing, particularly within the renter-occupied market.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	5,065	15%
1-unit, attached structure	15,870	46%
2-4 units	5,490	16%
5-19 units	2,945	9%
20 or more units	5,100	15%
Mobile Home, boat, RV, van, etc	40	0%
Total	34,510	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	40	0%	1,525	9%
1 bedroom	225	2%	4,780	27%
2 bedrooms	1,650	15%	4,850	28%
3 or more bedrooms	9,055	83%	6,465	37%
Total	10,970	100%	17,620	101%

Table 28 – Unit Size by Tenure

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Trenton Housing Authority has 11 public housing developments that serve approximately 3,200 families, seniors, and disabled persons. The City does not participate in the Section 8 Housing Choice Voucher program. Section 8 Housing Choice Vouchers are administered by the NJ Department of Community Affairs (DCA).

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to HUD's multifamily/Section 8 contracts database, there are units for which project-based rental assistance contracts will expire during the next five years.

Does the availability of housing units meet the needs of the population?

The availability of housing units does not meet the needs of the population. Like many jurisdictions across the nation, Trenton is currently experiencing a shortage of affordable and available rental units. The shortage of affordable housing affects households across several income groups but is particularly acute for extremely low-income households.

Slightly over half of Trenton's households are cost-burdened, meaning they contribute over 30% of the household's income to housing-related expenses. According to the 2016 – 2020 CHAS data, there are 11,190 households within the City living at or below 30% of HUD-Adjusted Median Family Income (HAMFI). Households within this income range experience housing instability at a comparatively higher rate. 64% or almost two-thirds of those living at 30% HAMFI are cost-burdened. Approximately 32% of these households experience at least one "severe housing problem", such as lacking a complete kitchen, living without adequate plumbing, being severely overcrowded, or spending 50% or more of their income on housing.

As federal, state, and local public funding options have continued to decline, the ability to promote affordable housing developments in Trenton has been increasingly more difficult. As a result, it is unlikely that the City's inventory of affordable and safe housing will keep pace with demand. The gap in affordable and safe housing particularly affects households that are low-income, elderly, and/or those living with a disability.

Describe the need for specific types of housing:

Specific housing needs were identified through stakeholder interviews and compiled from various studies and reports. Stakeholders expressed the need for more supportive housing targeted towards families and special needs populations. The lack of housing options is leaving individuals homeless for longer.

Trenton Health Team in partnership with the City of Trenton and the Trenton Housing Authority provides down payment assistance and a home repair program. Stakeholders from Trenton Health Team report difficulty engaging with renters due to fear of landlord compliance. This points to the increasing need to educate tenants on their rights and the resources available to assist them. The Trenton Health Team expressed the need for homeownership counseling as many applicants who come to them for down payment assistance are not ready for homeownership. Those who are ready for homeownership financially often still need supportive services to help keep them housed. Many of those who qualify for down payment assistance find that the homes they qualify for require urgent repairs to make them livable. As the cost of home repair is rising this speaks to the need for more funding for newly owner-occupied housing repair.

Further, housing needs include the provision of services to help those with histories of trauma, mental illness, and addiction to retain stability in housing.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 3,680 rental units identified as affordable to households below 30% of the HUD-adjusted Median Family Income represent only 12.3% of the rental housing inventory in the City. Given that CHAS data indicates there are 11,190 households with incomes below 30% of HAMFI, for every rental unit affordable to households within this income range, there are more than two households in need of the unit. This gap between need and supply represents a clear and demanding need for additional affordable housing units.

The 2025 Fair Market Rent (FMR) for a two-bedroom unit in Mercer County is \$2,028 per month. To avoid being cost-burdened, a household needs to earn \$6,760 per month or roughly \$42.25 per hour. A minimum wage worker in New Jersey earning \$15.13 per hour needs to work in excess of 110 hours per week to afford a two-bedroom unit. The monthly Supplemental Security Income (SSI) payment is \$943. Households, for which this is the sole source of income can spend \$283 monthly on housing, which is less than a quarter of the cost of renting a one-bedroom unit.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	107,200	97,000	(10%)
Median Contract Rent	798	918	15%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Housing Cost Table (SUPPLEMENTAL)

Housing Values	Base Year: 2009	Most Recent Year: 2023	% Change
Median Home Value	\$131,000 (\$154,271.54 in 2023)	\$122,500	-6.4% (-20.5% adjusted)
Median Contract Rent	\$746 (\$878.52 in 2023)	\$1,045	+40% (+18.9% adjusted)

Data Source: 2016-2020 5-Year ACS (B25077, B25058), 2019-2023 5-Year ACS (B25077, B25058)

Rent Paid	Number	%
Less than \$500	4,165	23.6%
\$500-999	6,690	38.0%
\$1,000-1,499	6,250	35.5%
\$1,500-1,999	470	2.7%
\$2,000 or more	45	0.3%
Total	17,620	100.0%

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	3,680	No Data
50% HAMFI	10,510	3,260
80% HAMFI	15,810	5,640
100% HAMFI	No Data	7,610
Total	30,000	16,510

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,158	1,321	1,732	2,108	2,327
High HOME Rent	897	1,082	1,361	1,749	1,936
Low HOME Rent	897	992	1,191	1,375	1,535

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There are 11,190 extremely low-income households earning 0-30% HAMFI in Trenton. Only 3,680 rental units are affordable to these households and an undetermined number of owner units are available. This shows that there is a significant shortage of affordable units available within the City for very low-income households. The 3,680 units would provide housing to approximately only 32.8% of extremely low-income households.

In contrast, there does not appear to be a shortage of affordable housing for very low-to-low-income households. A total of 5,065 very low-income households in the City earn 30-50% HAMFI. According to the CHAS database, 10,510 rental units and 3,260 owner units (a total of 13,770 units) are available and affordable to this income group. A total of 4,460 low-income households in the City earn 50-80% HAMFI. There are approximately 15,810 affordable rental units and 5,640 affordable owner units (a total of 21,450 units) available, according to the CHAS database.

According to the CHAS database, a total of 3,285 moderate-income households in the City earn 30-50% HAMFI. The data shows that there are approximately 7,610 affordable owner units available. There is no data available for affordable rental units.

Based on this data, the supply of affordable housing is insufficient only for extremely low-income households earning 0-30% HAMFI in the City of Trenton.

How is affordability of housing likely to change considering changes to home values and/or rents?

The estimated median home value within the City of Trenton decreased between 2009 and 2023 by 6.4% (21% when adjusted for inflation) from \$131,000 to \$122,500. Over this same period, the City's contract rent increased by 19% (40% when adjusted for inflation) from \$746 to \$1,045.

According to the 2023 ACS data median household income in Trenton increased by 29% between 2010 and 2023, from \$36,601 to \$47,102. While median household incomes have increased within the past 10 years, decreasing home values and rising contract rent in a City where 64.1% of households are renters shows that homeownership may become unaffordable to renters as most of their income goes to housing expenses leaving little to no room to save for downpayment and closing costs.

In addition to decreasing home values, stakeholders report investors are buying up housing stock to convert to non- low-income rental units in Trenton, making it difficult for residents to participate in the market. The market rate of these units are not affordable and price is not always an indication of higher quality.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The City's current median contract rent is estimated to be \$1,045 according to 2023 ACS data. This median contract rent is lower than the Fair Market Rents for all unit types. In terms of High HOME Rent and Low HOME Rent, the trend is similar, where the median contract rent is lower than the High HOME rent but slightly higher than Low HOME Rent. The rising rents in the City will soon catch up to FMR which will require a deeper subsidy to be provided to keep units affordable.

In general, rental units may continue to be affordable to low- and moderate-income households in Trenton; however, very-low-income households (0-30% HAMFI) may have more difficulty finding housing they can afford.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The following data provides an overview of the condition of housing in the City of Trenton.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The following definitions apply to residential buildings in the City of Trenton:

- *Substandard Condition*: Residential property that is not up to the local building or housing code.
- *Substandard Condition but Suitable for Rehabilitation*: Residential property that is not up to the local building or housing code but could be brought up to code for less than 50% of the property replacement costs.
- *Housing Conditions*: Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards.

Condition of Units

The table below shows the number of housing units, by tenure, based on the number of selected conditions or characteristics the unit has. Selected conditions are similar to housing problems reported in the Needs Assessment section of this Consolidated Plan and include the following: (1) the lack of complete plumbing facilities, (2) the lack of complete kitchen facilities, more than one person per room, and (4) cost burden greater than 30%. The table also includes the calculations for the percentage of total units in each category.

Renter-occupied units have a higher percentage of units with substandard conditions than owner-occupied units; however, 71% of owner-occupied units and 38% of renter-occupied units have no substandard conditions.

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,135	29%	10,290	58%
With two selected Conditions	65	1%	625	4%
With three selected Conditions	0	0%	95	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	7,760	71%	6,605	38%
Total	10,960	101%	17,615	101%

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

As indicated in the table below, the majority of the housing stock, both renter- and owner-occupied units in the City of Trenton, was constructed before 1950. The age of the housing stock points to the need for residential rehabilitation, for both renter- and owner-occupied units.

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	615	6%	1,225	7%
1980-1999	640	6%	1,145	7%
1950-1979	1,810	17%	5,945	34%
Before 1950	7,900	72%	9,300	53%
Total	10,965	101%	17,615	101%

Table 34 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,710	89%	15,245	87%
Housing Units build before 1980 with children present	670	6%	330	2%

Table 35 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

The table below prepopulated null in the IDIS eCON Planning Suite and cannot be changed manually. 2019-2023 ACS Five Year estimates indicate there are 3,767 vacant housing units in Trenton, this represents approximately eleven percent (10.5%) of all housing units. The City does not track housing units suitable for rehabilitation.

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 36 - Vacant Units

Need for Owner and Rental Rehabilitation

Older housing typically requires more continual maintenance. In the absence of routine maintenance, older housing can quickly become substandard. A common age threshold used to signal a potential

deficiency is approximately 50 years or more. The age of the housing stock in the City of Trenton is older than the countrywide average. Approximately 20% of the nation's overall housing stock was built before 1950; for Trenton, 72% of owner-occupied and 53% of renter-occupied units were built before 1950. 17% of all owner-occupied units and 34% of all renter-occupied units were built between 1950 and 1979. Although the data shows that both owner and rental units require rehabilitation from normal wear and tear, the need is slightly greater for owner units as 72% of owner-occupied housing was built before 1950, compared to 53% for renter-occupied units. Stakeholders reiterate the need for new-owner-occupied rehabilitation with reports that many households participating in the City's Down Payment Assistance Program often find homes that are not move-in ready and in need of repairs. As repairs are costly applicants often cannot afford to carry them out.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are therefore considered at risk for containing lead-based paint. HUD has made the elimination of housing units containing lead-based paint a priority. The poisoning of children from contact with lead-based paint has been recognized as a major public health problem by the Center for Disease Control (CDC). According to the CDC, lead is the number one environmental health hazard to American children. It is estimated that 3% of children age 1-5 in the United States are affected by elevated blood lead levels. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior.

Lead-based paint hazards pose the greatest risk for children, especially those under seven years of age. The HUD IDIS-generated table above (Table 35) provides data on owner-occupied and renter-occupied units built before 1980 with children present. Table 35 notes that 9,710 owner-occupied housing units were built prior to 1980, and 15,245 renter-occupied housing units were built prior to 1980. These units are assumed to have a higher risk of lead-based paint hazards.

According to CHAS data, 670 owner-occupied low- and moderate-income households (80% HAMFI and below) with at least one child aged 6 or younger live in housing units built before 1980. These households, 6% of all owner-occupied households, are at risk for lead-based paint hazards. There are also 330 renter-occupied households, 2% of all renter-occupied households, which are at risk for lead-based paint hazards.

As of 2023, there are an estimated 32,104 occupied housing units within Trenton. Approximately 29,808 or 92.8% of these housing units are assumed to have a higher risk of lead-based paint hazards. There are approximately 20,715 low- or moderate-income households (earning less than or equal to 80% HAMFI) in The City of Trenton that may have a higher risk of lead-based paint hazards.

To protect children from adverse health effects due to exposure to lead hazards in their homes and the surrounding environment the City of Trenton's Health and Human Services Departments funds the Childhood Lead Poisoning Prevention Program. This program provides case management services for Trenton children testing positive for elevated venous blood lead levels of 5µg/dL or above.

According to the health needs assessment conducted by the Trenton Health Team, over 90% of all homes in Trenton were constructed before 1978 when lead-based paint was prohibited. Many homes in Trenton are highly likely to contain lead-based paint, which can cause lead poisoning in children. It is estimated that more than 50% of Trenton school children have a level of lead in their blood that affects their learning and behavior.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Trenton Housing Authority (THA) has 11 housing developments with over 1,700 public housing units. Of those units, 411 are for seniors and people with disabilities. The remaining units are family developments.

The THA has worked with the U.S. Department of Housing and Urban Development (HUD) on multiple initiatives to increase affordable housing in Trenton. THA is currently working on a mixed-income development using the RAD conversion program to replace the obsolete Donnelly Homes with up to 639 new units utilizing the Choice Neighborhood Planning grant for the North Trenton Battle Monument area.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project-based	Tenant-based	Vouchers		
							Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			1,838						
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Trenton Housing Authority administers 1,700 public housing units across 11 residential developments including scattered sites.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Trenton Housing Authority administers 1,700 public housing units across 11 residential developments including scattered sites. THA's most recent 5-Year PHA Plan identified expanding the supply of assisted housing as a goal of the housing authority over the next five years. THA seeks to carry this goal out through the following:

- Redevelop the Frazier Court II (former Campbell Homes) property, which is currently vacant and non-performing, in accordance with HUD's Rental Assistance Demonstration Program (RAD).
- THA plans on developing a Homeownership program.
- Submit a Transformation Plan for the CHOICE Neighborhood planning grant. This transformation plan in the North Trenton Battle of Monument neighborhood will increase affordable housing.

Public Housing Condition

Public Housing Development	Average Inspection Score
Brunswick Village Limited Partnership	80b
CATHEDRAL SQUARE HOUSING	94c*
POND RUN I /aka/ Hamilton Senior Citizens	94b*
Leonard Building	92b
Lawrenceville Consumer Home	96a
LUTHER ARMS	95b
NORTH 25	88c*
Alvin E. Gershen Apts a/k/a POND RUN II	86c
Rowan Towers	72b
TRENT CENTER EAST	87b*
TRENTON GROUP HOME	99a
TRENTON II CONSUMER HOME	85b
OAKLAND PARK APARTMENTS	97b
CITYSIDE APTS I	46c*
South Village I & II	95b
Turner Pointe	99a

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

THA's most recent 5-Year PHA Plan identified providing an improved living environment as a goal of the housing authority over the next five years. THA seeks to carry this goal through the following:

- Upgrading community space and common areas and to add amenities where feasible
- Installing landscape and parking improvements throughout all THA properties
- Installing new building entry doors and electronic key systems at all three-story walk-up buildings
- Upgrading video surveillance system throughout all THA properties (i.e., replace existing obsolete cameras, identify areas for installation of new cameras)
- Continuing aggressive lease enforcement actions surrounding quality of life issues (i.e., littering, illegal dumping, unauthorized parking, poor housekeeping)

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

The Trenton Housing Authority participates in the Family Self-Sufficiency Program (FSS). This program promotes self-sufficiency and goal-setting among participants. Goals can range from budgeting and saving to achieving homeownership. The mission of the program is to help THA residents set and achieve short- and long-term goals, one family at a time. THA's 5-Year Plan identified promoting self-sufficiency among residents through linking residents to employment and education opportunities, promoting homeownership and financial literacy, promoting healthy and active lifestyles, increasing enrollment in early childhood education, and providing opportunities to residents to pursue careers in construction and related fields.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Trenton is the lead entity for the Trenton/Mercer Continuum of Care (CoC). The CoC's Homeless Management Information System (HMIS) tracks aggregate CoC-wide data and is unable to isolate data for the City of Trenton. Trenton is where the overwhelming majority (approximately 95%) of homeless housing and service providers are located. According to the 2023 American Community Survey, 23.5% of Mercer County residents live in Trenton and over 56% of Mercer County residents that are below the poverty level live in Trenton. Trenton/Mercer CoC data provides a good picture of homelessness in Trenton.

The City of Trenton and the CoC have a valuable partner in the Mercer Alliance to End Homelessness. Since 2015 the Alliance has engaged in a Housing First model. The Alliance has been successful at working with the County Board of Social Services and City Department of Social Services to leverage significant resources from the HUD Supportive Housing Program for Permanent Supportive Housing.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	123		20	521	
Households with Only Adults	102		72	578	
Chronically Homeless Households	n/a		n/a	249	
Veterans	0		0	57	
Unaccompanied Youth	34		14	43	

Table 39 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

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.

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

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

The Trenton/Mercer CoC agencies will provide these services through funding from local, state, federal and private sources. The Continuum collaborates with other agencies, government, the faith-based community and other concerned organizations and individuals.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Trenton/Mercer County COC offers the following resources to meet the needs of homeless persons:

- Emergency Shelters: Six year-round shelters with 225 beds; two facilities and four voucher/hotel bed programs for 190 overflow beds
- Other Permanent Housing: Two facilities with 350 year-round beds
- Permanent Supportive Housing: 430 year-round beds
- Rapid-Rehousing: 266 year-round beds
- Transitional Housing: 96 year-round beds

The Mercer County Office on Homeless Services works in partnership with local agencies by funding programs to address the needs of the homeless population. These programs include:

- Legal services for indigent clients in Mercer County
- Production of affordable housing units targeted at homeless individuals and households or those at risk of becoming homeless
- 24-hour response for individuals and families experiencing homelessness placed at hotels/motels and Code Blue alert plans to shelter at-risk individuals during severe weather
- Homeless support services to Mercer County residents to assist in obtaining housing
- Client-centered case management services to serve individuals experiencing chronic homelessness with co-occurring disorders, severe and persistent mental illness, involvement

with the criminal justice system, and/or other challenges that prevent them from obtaining and maintaining stable housing

- Liaison/case management services for homeless individuals
- Day drop-in center for single adults experiencing homelessness at the local emergency shelter
- Emergency shelter services for homeless, single adults
- Identification services for Mercer County individuals experiencing homelessness
- Short-term rental assistance and supportive services including rental assistance, housing location, and intensive case management in the community for families who are experiencing homelessness or at risk of becoming homeless
- The VASH program provides a slight subsidy that pays veterans rent for two years.
- Anchor Housing, Inc. developed Connect Home which provides vouchers for 20 youth who are aging out of foster care (18–21-year-olds).

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The special needs population includes individuals with mobility impairments or disabilities that require supportive services. Typically, this population has severe or persistent mental illness, development, and/or physical disabilities. Several organizations provide facilities and services for special needs populations in Trenton.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, describe their supportive housing needs.

Elderly and Frail Elderly

According to the SAGE Report for July 1, 2021, through June 30, 2022, 8.1% of those accessing programs were aged 62 years or older. Stakeholders reported seeing more elderly being displaced due to rent increases, forcing some elderly to emergency shelters for housing. Further complicating the problem are safety concerns when housing elderly individuals in temporary shelters. Many have mobility challenges that are not easily accommodated in shelters.

Persons with Mental, Physical, and/or Other Developmental Disabilities

According to the SAGE Report, just over 55% of homeless individuals assisted listed physical, mental, or chronic health conditions. For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. There is a severe need for permanent supportive housing that can accommodate persons with disabilities. In addition, there is a need for accessible, particularly one-bedroom and first-floor units, for persons with disabilities. There is also a need for more services for these individuals.

Persons with Alcohol or other Drug Addictions

No specific data on the housing needs of persons with alcohol or other drug addictions is available for the City of Trenton. There are a myriad programs and services for substance abuse treatment in Trenton, including support groups, withdrawal management, residential and outpatient services, counseling for co-occurring mental health diagnoses, medication-assisted treatment (MAT), and syringe access programming. The city also has several recovery meeting options with at least one available every day of the week.

There is a need for transitional housing and permanent supportive housing for those recovering from addiction to maintain a clean lifestyle and prevent recidivism.

Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking

The Trenton SAGE Report reported nearly 17% of persons assisted had a history of domestic violence with 72.4% actively fleeing domestic violence when they sought assistance. Children account for 40% of those receiving assistance. Clients fleeing domestic violence are in immediate need of safe emergency shelters. Individual family units with two to three bedrooms are needed for adults fleeing with children.

Once stabilized, rental assistance is required to maintain safe housing. Additional services needed for these households include therapy and substance abuse services, counseling (for adults and children), job readiness, financial planning, legal services, affordable childcare, and transportation. These same housing and supportive services are needed for persons fleeing or attempting to flee human trafficking.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Persons who face mental or physical health challenges are often discharged from institutions with no place to go. Many often are unable to find affordable independent housing. Several of the homeless population have been discharged from institutions with no other housing options but shelters or returning to the streets.

The Trenton/Mercer County Continuum of Care (CoC) works to implement a cohesive, community-wide discharge coordination policy that can be successfully implemented to ensure that persons being discharged from publicly funded agencies and institutions do not become homeless upon release. The CoC's sub-committees hold regular meetings to discuss gaps in services and connect persons who are homeless or near homeless with appropriate resources.

While more need to be established, there are some programs in place to provide appropriate housing after discharge. The Trenton/Mercer CoC worked with the New Jersey Policy Academy to develop the state's discharge plan. The vision for this plan is one that plans for greater coordination of services and programs required to address homelessness in New Jersey including the promotion of prevention strategies and services to prevent homelessness and reduce the risk of homelessness for families and individuals.

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

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

The Trenton and Mercer County correctional facilities have established protocols for discharge. This includes an interview by a social worker in which they ask where the individual will be living upon release. For those with no address/home to return to, social work staff have an established procedure with the County Board of Social Services who then work together to identify and secure appropriate housing placement.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Trenton seeks to assist low-income households and special needs persons with their housing and community development needs.

The City's Department of Human Services provides a variety of services in the City for elderly residents including several senior centers and nutrition sites. These facilities work to improve the well-being of senior citizens in Trenton.

The CDBG funds will continue to support the senior center programs both through facility rehabilitation as well as public service funding.

To the extent that persons with disabilities, AIDs /HIV, or who are victims of domestic violence are income-qualified, the City's efforts to expand affordable housing through the use of HOME and CDBG program funds will benefit persons with special needs.

Additionally, the City of Trenton will support and assist the Continuum of Care and the network of emergency shelter, transitional housing, and homeless service providers to accomplish the goal of moving homeless individuals and families into permanent housing.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

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The CDBG funds will continue to support the senior center programs both through facility rehabilitation as well as public service funding.

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Additionally, the City of Trenton will support and assist the Continuum of Care and the network of emergency shelter, transitional housing, and homeless service providers to accomplish the goal of moving homeless individuals and families into permanent housing.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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

Barriers to affordable housing in Trenton include a suppressed housing market, limited desirable market-rate housing, vacancy and abandonment, a lack of quality affordable housing, and difficulties in maintaining quality housing stock. The city also faces challenges in securing home improvement loans and addressing the needs of all families, including low-income households.

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

Municipal zoning practices and regulatory frameworks have historically hindered the development of affordable housing. Exclusionary zoning, such as restrictive land-use regulations, can limit where affordable housing can be built. Additionally, the dissolution of the Council on Affordable Housing (COAH) in 2024 has left municipalities without a centralized agency to guide affordable housing obligations, leading to legal uncertainties and delays in housing development.

Senate Bill S50, a landmark housing bill, was signed into law in March 2024 by the New Jersey legislature to expand the housing supply by allowing for greater density and streamlined development. The law replaces the Mount Laurel Doctrine, a legal mandate requiring New Jersey towns to provide their fair share of affordable housing based on regional needs. Under this new system, a clearer method for calculating each municipality's housing requirements is established and allows for a faster dispute resolution process to address challenges. These changes are intended to make it easier for towns to meet their obligations while ensuring that more affordable housing gets built across the state. The law has received some pushback from communities fueled by common misconceptions surrounding zoning reform.

In general, Trenton will continue to work with non-profit housing developers and providers to increase the affordable housing stock in the city. The City will do this primarily through neighborhood planning efforts, code enforcement, blight reduction campaigns, and economic development initiatives such as improving job training and opportunities for all those who reside in Trenton.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

In determining priorities for the allocation of federal funds, the City of Trenton recognizes the need to foster a competitive local economy that expands economic opportunities for present and future residents. This section describes the local workforce, the nature of current employment and activities that coordinate economic development efforts across local and regional agencies.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	97	1	0	0	0
Arts, Entertainment, Accommodations	3,232	1,343	11	7	-4
Construction	836	707	3	4	1
Education and Health Care Services	7,046	7,233	24	38	15
Finance, Insurance, and Real Estate	1,552	568	5	3	-2
Information	495	862	2	5	3
Manufacturing	2,028	867	7	5	-2
Other Services	1,083	1,328	4	7	3
Professional, Scientific, Management Services	2,074	1,444	7	8	1
Public Administration	0	0	0	0	0
Retail Trade	3,659	1,101	12	6	-6
Transportation and Warehousing	2,221	668	7	4	-4
Wholesale Trade	1,349	659	5	3	-1
Total	25,672	16,781	--	--	--

Table 40 - Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	36,260
Civilian Employed Population 16 years and over	32,525
Unemployment Rate	10.34
Unemployment Rate for Ages 16-24	22.71
Unemployment Rate for Ages 25-65	6.19

Table 41 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	3,910
Farming, fisheries, and forestry occupations	1,215
Service	4,665
Sales and office	6,720
Construction, extraction, maintenance, and repair	3,470
Production, transportation, and material moving	2,910

Table 42 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	21,501	70%
30-59 Minutes	6,546	21%
60 or More Minutes	2,798	9%
Total	30,845	100%

Table 43 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,500	650	4,555

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	9,205	1,140	6,565
Some college or Associate's degree	6,700	760	3,340
Bachelor's degree or higher	5,115	210	1,005

Table 44 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	304	1,060	1,470	2,430	1,180
9th to 12th grade, no diploma	1,075	1,730	1,520	2,490	1,610
High school graduate, GED, or alternative	2,605	5,040	4,440	7,430	3,310
Some college, no degree	2,730	2,470	2,120	4,200	1,455
Associate's degree	195	340	555	1,120	460
Bachelor's degree	300	1,660	1,085	1,895	825
Graduate or professional degree	15	180	495	1,015	545

Table 45 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,303
High school graduate (includes equivalency)	27,161
Some college or Associate's degree	35,805
Bachelor's degree	47,583
Graduate or professional degree	60,893

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the table above the top 3 major employment sectors in Trenton/Mercer County are as follows:

1. Education and Health Care Services
2. Retail Trade
3. Arts, Entertainment, Accommodations

Describe the workforce and infrastructure needs of the business community:

The Trenton 250 Master Plan, in conjunction with the Delaware Valley Regional Planning Commission (DVRPC) 2024-2028 CEDs Report, and the 2023 Mercer County Workforce Development Board Local Plan, were used to identify workforce development and infrastructure challenges in Trenton.

Workforce Needs

Skills Gap and Training Initiatives:

Trenton faces a disconnect between the skills of its workforce and the needs of modern industries. To bridge this gap, the city emphasizes partnerships among public, private, and non-profit sectors to align training programs with employer demands. Efforts include expanding access to affordable higher education and relevant training through institutions like Mercer County Community College and leveraging proximity to public transit to create accessible training centers.

Healthcare Workforce Shortages:

The healthcare sector in Trenton is experiencing significant workforce shortages, particularly in nursing and public utilities. Projections indicate a shortage of 11,400 nurses in New Jersey by 2030, impacting local healthcare providers. To address this, initiatives like Capital Health's EMT Academy and partnerships with Mercer County Community College aim to create employment pipelines for residents.

Infrastructure Needs

Industrial Site Development:

Trenton's industrial growth is hindered by the lack of modern, "shovel-ready" sites. Many existing industrial properties are fragmented and lack the physical characteristics demanded by contemporary industries, such as large floorplates and adequate parking. The city aims to consolidate and market these parcels to attract new businesses.

Downtown Revitalization:

The downtown area struggles with limited retail options and underutilized spaces. Efforts are underway to create a Downtown Strategic Development Plan, encourage the consolidation of state offices downtown, and expand market-rate housing. These initiatives aim to strengthen arts, culture, and heritage, and support and expand downtown retail.

Transportation Connectivity:

Enhancing transportation infrastructure is crucial for economic development. The city plans to leverage the Trenton Transit Center and the Delaware Waterfront to attract private sector development. Improving transit connections to job centers and reclaiming the waterfront for mixed-use development are key components of this strategy.

Supportive Programs and Incentives

Urban Enterprise Zone (UEZ) Program:

Trenton's UEZ offers financial incentives to stimulate economic activity, including tax benefits and low-interest loans for businesses that create jobs for city residents. The program has successfully supported over 800 businesses, contributing to the construction and rehabilitation of commercial spaces.

Business Support Resources:

Various programs provide financial assistance to small businesses, such as the Small Business Improvement Grant, which offers reimbursements for building improvements, and the Small Business Lease Assistance Program, which covers a portion of lease payments for new or expanding businesses.

By addressing workforce development and infrastructure challenges through targeted initiatives and supportive programs, Trenton aims to revitalize its economy and create a sustainable environment for businesses and residents alike.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Trenton, New Jersey, is undergoing several transformative initiatives poised to significantly impact its economic landscape, particularly concerning job creation and business growth.

Downtown Revitalization and Mixed-Use Development

Trenton's downtown area is experiencing a resurgence through substantial investments aimed at enhancing its appeal for residents and businesses alike. Key projects include:

- **Residential Conversions:** Historic buildings such as the former Bell Telephone Building (100 units), Van Sciver Building (120 units), and 240 West State Street (170 units) are being transformed into residential spaces, increasing downtown's population density and consumer base.
- **Waterfront Redevelopment:** The Waterfront Reclamation and Redevelopment Project (WRRP) aims to reconnect the city to the Delaware River by converting Route 29 into an urban boulevard. This initiative is expected to stimulate mixed-use development and enhance recreational spaces.

- **Cultural and Retail Expansion:** Efforts are underway to establish a creative district downtown, bolstering arts and cultural offerings, which in turn support retail growth and make the area more attractive for businesses.

Infrastructure Enhancements

Significant infrastructure projects are set to improve connectivity and support economic development:

- **Trenton–Mercer Airport Expansion:** A \$300 million project will expand the airport’s terminal from 28,000 square feet to 125,000 square feet. This expansion is anticipated to boost regional travel and commerce.
- **Transportation Improvements:** Plans include the redevelopment of the Trenton Transit Center area and the reconfiguration of Route 29 to better integrate with the city’s layout, enhancing accessibility and encouraging investment.

Support for Small Businesses and Innovation

To foster entrepreneurship and innovation, several programs and initiatives have been introduced:

- **Main Street Recovery Finance Program:** This program offers grants and loans to small businesses, aiming to alleviate financial challenges and promote growth.
- **Strategic Innovation Centers:** Partnerships, such as the one between NJEDA and Nokia Bell Labs, are establishing centers to support startups and technological innovation, providing resources and mentorship to emerging companies.

Workforce Development Initiatives

Addressing labor shortages and preparing the workforce for future demands are key focuses:

- **Healthcare Workforce Support:** Programs are being developed to address shortages in healthcare professionals, including nurses and doctors, through training and retention strategies.
- **Manufacturing Training Programs:** Initiatives targeting youth ages 16-24 are promoting careers in manufacturing, offering certifications and apprenticeships to build a skilled workforce.

Economic Incentive Programs

To attract and retain businesses, Trenton offers various incentive programs:

- **New Jersey Aspire Program:** Provides tax credits to encourage redevelopment projects, helping to bridge financing gaps and stimulate investment.
- **Food Desert Relief Program:** Offers tax incentives to businesses establishing grocery stores in underserved areas, aiming to improve access to fresh food and stimulate local economies.

Collectively, these initiatives are designed to revitalize Trenton's economy, create job opportunities, and foster a vibrant business environment. By enhancing infrastructure, supporting small businesses, and investing in workforce development, Trenton is positioning itself for sustainable economic growth.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

While Trenton's workforce currently faces challenges in meeting the skill demands of evolving industries, concerted efforts through education and training programs are actively addressing these gaps. By investing in both adult education and youth development, Trenton is laying the groundwork for a more robust alignment between its workforce capabilities and employers.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Mercer County's Workforce Development Board (WDB) is a policy-making board for occupational skills training and educational programs in local areas composed of private, public, and educational partners. WDBs are charged with integrating publicly funded services and training into a workforce system that is responsive to the needs of job seekers and employers. WDBs assist the One-Stop Career Center in assessing local programs to ensure alignment with labor market needs

To bridge identified gaps in the workforce, several programs have been established:

Workforce Development

- Mercer County One-Stop Career Center: Offers resume workshops, skills assessments, career counseling, and occupational training to connect job seekers with employment opportunities.
- SkillUp NJ: Provides free online courses ranging from basic work readiness to advanced professional skills, including certifications in areas like customer service and data management.
- NJ Pathways to Career Opportunities: A collaboration between community colleges and industry leaders focusing on sectors such as health services, manufacturing, and technology to create structured career pathways.
- Workforce Learning Link: Delivers instruction in essential areas like reading, writing, math, and financial literacy, targeting adult learners to improve employability .
- Isles, Inc.: Through programs like the YouthBuild Institute, Isles offers vocational training in construction, technology, and environmental services, aiming to equip at-risk youth with marketable skills.

Youth and Early Career Development

- Work-Based Learning (WBL): Facilitates partnerships between students and local businesses, allowing students to gain practical experience and earn academic credits before graduation.
- Summer Youth Employment Program: Provides high school and college students with opportunities to develop professional skills and gain real-world work experience during the summer months.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Mercer County participates in the Growing Greater Philadelphia CEDS which covers a nine-county region—Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania, and Burlington, Camden, Gloucester, and Mercer in New Jersey. The CEDS was developed through guidance and support by an Economic Development Committee made up of public and private-sector representatives.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The regional CEDS aligns with the goals of the Mercer County Workforce Development Board and Trenton's 250 Master Plan. These goals include aligning workforce needs and training, increasing job opportunities and career path opportunities for all people; attaining regional growth and global connectivity; strengthening infrastructure including telecommunications and transportation; and supporting inclusive growth to empower all communities which include affordable housing.

The Trenton 250 plan goals for economic development are to:

- improve the retail environment.
- create new development and business opportunities in key locations.
- create an improved business environment that provides high-quality employment to residents.
- take advantage of the region's employment strengths and growth areas.
- strengthening Trenton's arts, culture, and heritage tourism; and
- promote all of these attributes to the outside world.

Specific goals and action steps for the City are included in the 250 Master Plan downtown and neighborhood development as well as industrial development.

Goal: Trenton's downtown and waterfront will be the economic center of Mercer County and the Central Jersey Region

- Ensure Stability: In executing this Downtown Strategy, the first thing the City must do is ensure that the State remains a stable employer in downtown Trenton and that it does not lose its base economy.

- **Attract Market-Rate Housing:** Next, the City must leverage its best redevelopment opportunities to attract market-rate rental housing development downtown.
- **Support Arts & Culture:** The City should strongly support efforts to establish a creative district downtown while strengthening Trenton’s arts and cultural offerings city-wide.
- **Nurture Retail:** The City will need to cultivate the growth of downtown retail to capture the economic impact of the downtown workforce, residents, and events. This means supporting and nurturing a cluster of unique and homegrown retail, restaurants, and events to increase social opportunities and a niche downtown in comparison to the suburbs and surrounding towns.
- **Leveraging Anchor Institutions:** ...the City should ensure that existing anchor institutions (Thomas Edison State University and Mercer County Community College) integrate into revitalization efforts and that their long-term development goals support and are supported by the Master Plan.
- **Capitalize on Key Physical Assets:** While the City works on the above sectors of the downtown economy, it cannot lose sight of the importance of capitalizing on two of its major locational advantages: the Trenton Transit Center and the Delaware Waterfront. Additional initiatives such as improving regional bike-pedestrian trail access, connecting the downtown to the waterfront, and placemaking initiatives will further reinforce the “livability” of downtown.
- **A Well-Rounded Reinforcing Structure:** These investments in creating housing options downtown; investing in arts, culture, and retail; and supporting anchor institutions are likely to have a snowball effect on the downtown economy.

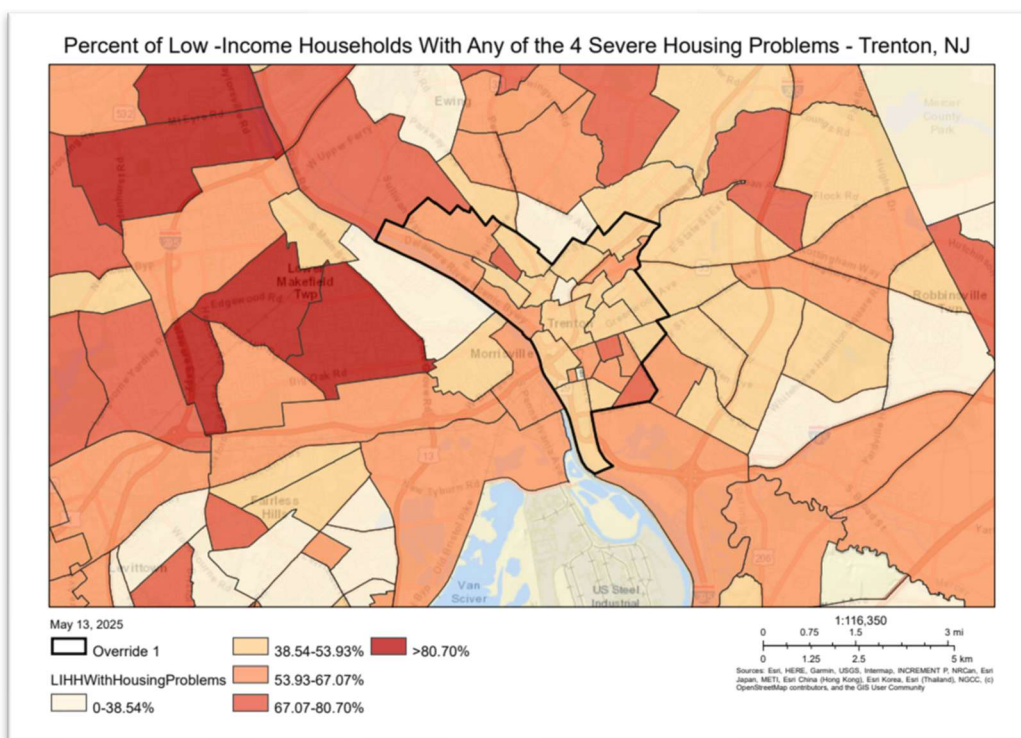
Goal: Trenton will attract employers to its industrial areas that generate comparatively high rates of job opportunities

Goal: Trenton will have vibrant neighborhood business districts: Overcome a lack of resources and support to encourage the growth of retail and service amenities in neighborhoods

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

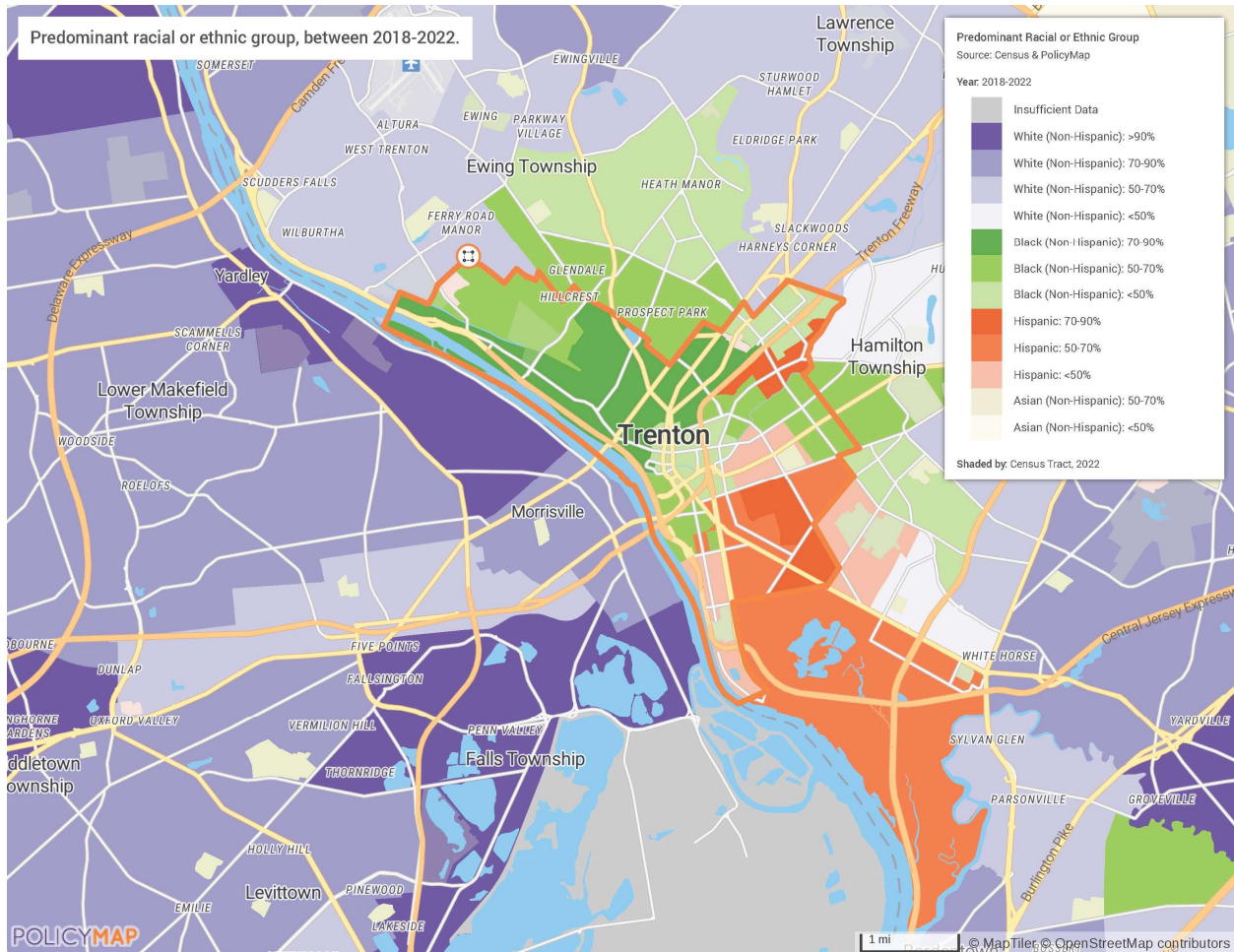
The City defines areas of concentration as areas where 25% or more of the units in a census tract are in substandard condition. As evidenced by the map below, a significant portion of the City experiences multiple housing problems. The data mapped below by census tract is based on housing quality indicators (selected conditions). Selected conditions are similar to housing problems in the Needs Assessment Section of this Consolidated Plan and include the following: (1) the lack of complete plumbing facilities, (2) the lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%.



Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

As Trenton is a majority-minority city, several areas show patterns of racial concentration. In neighborhoods to the west of central Trenton, African-American households make up 70% or more of total neighborhood households. Similarly, in Southeast Trenton, many of the neighborhoods support a Hispanic population that make up 70% or more of the neighborhood's total households.

Trenton, NJ: Predominant Racial or Ethnic Group between 2018-2022



What are the characteristics of the market in these areas/neighborhoods?

The report, *Laying the Foundation for Strong Neighborhoods in Trenton NJ*, characterized most of the areas closer to the downtown as more likely to be struggling, including most of North Trenton, Wilbur, Stuyvesant-Prospect, East Trenton, and Central West; that part of South Trenton closest to downtown, and much of Chambersburg and Chestnut Park. Some of these areas show strength in some indicators, however, suggesting potential opportunities. Examples include low levels of vacant properties in Chambersburg and Chestnut Park, suggesting that targeted strategies to deal with vacant properties might help stabilize these neighborhoods. These same neighborhoods also have relatively low levels of property tax delinquency, which may mean a higher level of commitment to the area by neighborhood property owners.

The City's Trenton 250 Master Plan describes the neighborhoods in East and North Trenton.

East Trenton has the largest concentration of African Americans in the City. East Trenton has a strong neighborhood history. The area is characterized as having dense single-family housing, mixed-use neighborhoods, and highly walkable streets.

North Trenton is a mixed-use neighborhood with a blend of residential, commercial, and industrial areas. It reflects a strong sense of community that stems from its legacy of racial integration and its role as a hub for Black and African American culture in Trenton. The Trenton 250 Plan describes this area as having strong residential neighborhoods that have a deep sense of community and history. This area will have a strong connection to Cadwalader Park and the network of trails that connect Trenton internally and to its neighbors.

Are there any community assets in these areas/neighborhoods?

The Trenton 250 Plan notes that the construction of the Assunpink Creek Greenway and Park, along with the potential for Bus Rapid Transit access along Route 1, and the proposed Market Street Corridor Project have the potential to change the market conditions in East Trenton significantly. Combined, these projects will make the area very attractive for residential development and a new anchor of stability in East Trenton.

The North Trenton area is the subject of a 15 million Choice Neighborhoods Planning and Action Grant. This project aims to redevelop distressed housing at Donnelly Homes, a public housing development owned by Trenton Housing Authority, with high-quality mixed-income options. The project will also provide residents with services focused on income, health, and education.

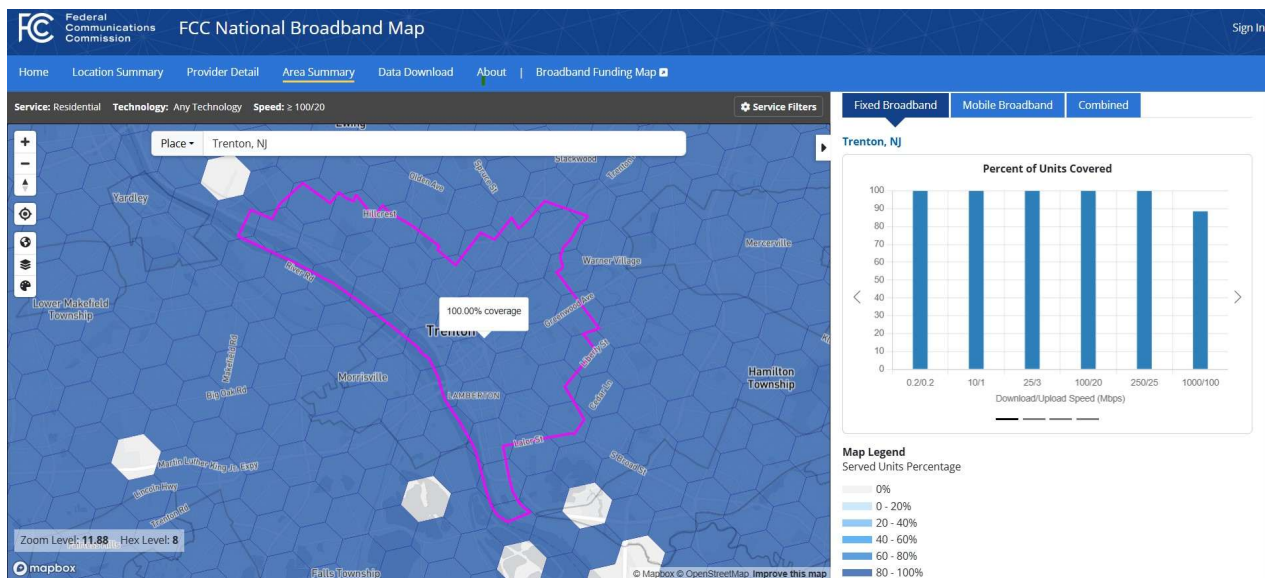
Are there other strategic opportunities in any of these areas?

All of these areas possess strategic investment opportunities that can help move the goals and objectives of the Trenton 250 Master Plan forward.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

As shown on the following map generated by the Federal Communications Commission (FCC) National Broadband Map, the vast majority of Trenton has access to broadband service indicating that there is not a digital divide among lower- and higher- income neighborhoods in terms of broadband availability.



Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The are several broadband providers serving the City of Trenton including Optimum, T-Mobile, X-finity, Verizon, and Earthlink.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Mercer County Department of Emergency Services updated its Hazard Mitigation Plan in 2021. The County plan identified the following as significant hazards affecting the entire planning area:

- Dam Failure
- Disease Outbreak
- Drought
- Earthquake
- Flood (including riverine, flash, sea level rise, urban flooding)
- Geological Hazards (landslide, subsidence, and sinkholes)
- Hurricane and Tropical Storm
- Infestation and Invasive Species (inclusive of harmful algal bloom)
- Nor'easter
- Severe Weather (high winds, tornadoes, thunderstorms, hail, extreme temperatures)
- Severe Winter Weather (heavy snow, blizzards, ice storms)
- Wildfire
- Hazardous Materials (Fixed Sites and Transportation)

According to the County Hazard Mitigation Plan the increase in greenhouse gas concentrations has led to New Jersey experiencing a 3.5° F (1.9° C) increase in the State's average temperature (Office of the New Jersey State Climatologist 2020), which is faster than the rest of the Northeast region (2° F [1.1° C]) and the world (1.5° F [0.8° C]). The Hazard Mitigation Plan states that this warming trend is expected to continue. The plan notes that New Jersey is expected to experience more intense rain events, less snow, and more rainfalls. Also, small decreases in the amount of precipitation may occur in the summer months, resulting in greater potential for more frequent and prolonged droughts. The Plan says that as temperatures increase so will the energy in a storm system, increasing the potential for more intense tropical storms and hurricanes making New Jersey more prone to flooding.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

In all of these cases, damage or loss sustained as a result of the disaster is likely to leave low-income households less likely to have resources or access to resources to aid in resiliency and recovery. The City's urgent rehabilitation programs can provide resources to assist in recovery.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The purpose of the Strategic Plan is to guide the use of CDBG funds in the City of Trenton over the next five years. The plan is guided by three overarching goals set by HUD that are applied according to the City's needs. The goals are:

- (1) To provide decent housing by preserving the affordable housing stock in both the rental and homeowner markets and increase the availability of affordable housing by reducing barriers due to zoning and increase the number of accessible units.
- (2) To improve the quality of life and living conditions for low- and moderate-income persons through improvements in public facilities and infrastructure.
- (3) To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

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

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

- Meeting the statutory requirements of the CDBG, HOME, and ESG programs;
- Meeting the needs of very-low, low-, and moderate-income residents;
- Focusing on low- and moderate-income persons, areas, or neighborhoods;
- Coordinating and leveraging resources;
- Responding to expressed needs;
- Achieving sustainability and/or long-term impact;
- Having the ability to measure or demonstrate progress and success.

The North Trenton Neighborhood is identified as a target area in support of the City of Trenton and the Trenton Housing Authority's Choice Neighborhood Planning Grant. The City will continue to support implementation actions that arise from the plan.

Area Name	Area Type
Choice Neighborhood– North Trenton	Comprehensive
Citywide	Other

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

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

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents

- Focusing on LMI areas or neighborhoods
- Coordinating and leveraging resources
- Responding to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Create and Maintain Affordable Housing
	Priority Level	High
	Population	Extremely Low (30% AMI) Low (50% AMI) Moderate (80% AMI) Large Families Families with Children Public Housing Residents
	Geographic Areas Affected	Citywide Choice Neighborhood - North Trenton
	Associated Goals	Increase the Number of Affordable Units
	Description	Support the creation and maintenance of affordable housing through homeownership opportunities, rental and homeowner housing development, and housing rehabilitation for homeowners and renter- occupied properties
	Basis for Relative Priority	Maintaining affordable housing continues to be a high priority for the City of Trenton.
2	Priority Need Name	Eliminate Blight
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Citywide Choice Neighborhood - North Trenton
	Associated Goals	Eliminate blighted and vacant buildings to improve the physical environment.
	Description	Eliminating blight in the City of Trenton includes the demolition and cleanup of vacant and severely deteriorated properties that pose a threat to the health and welfare of individuals. Vacant properties that are unsuitable for rehabilitation will be targeted.
	Basis for Relative Priority	Eliminating blight continues to be a high priority for the City.
3	Priority Need Name	Improve Public Infrastructure
	Priority Level	High
	Population	Non-housing Community Development

	Geographic Areas Affected	Citywide Choice Neighborhood - North Trenton
	Associated Goals	Improve and expand infrastructure Improve and expand public facilities
	Description	Improve the public infrastructure, including the City's sidewalk, water, sewer, and stormwater systems in primarily LMI areas.
	Basis for Relative Priority	Public infrastructure improvements continue to be a high priority for the City.
4	Priority Need Name	Improve Public Facilities
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Citywide Choice Neighborhood - North Trenton
	Associated Goals	Improve and expand infrastructure Improve and expand public facilities
	Description	CDBG funds will be used to improve the City's public facilities, including senior centers, community centers, libraries, and other facilities used by the City's low- and moderate-income population.
	Basis for Relative Priority	Improving the public facilities in the City continues to be a high priority.
5	Priority Need Name	Enhance Public Services
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Continue non-housing community development supportive service
	Description	A range of public services are needed in the City of Trenton. The high priority needs are programs for elderly residents, youth and adult educational programs, youth services including day care, and job skills and life skills development.
	Basis for Relative Priority	Public services are greatly needed in the City of Trenton to address a wide-range of needs, including childcare and after-school programs for children, job skills and life skills development and programs for the elderly.
	Priority Need Name	Provide Homeless Housing and Services

6	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Housing and Services for Homeless Persons
	Description	Addressing the needs of persons who are homelessness in the City of Trenton is a high priority. Needs include affordable housing and services to support and maintain independent living.
	Basis for Relative Priority	The City of Trenton will continue to address the needs of persons who are homeless.
7	Priority Need Name	Planning and Administration
	Priority Level	High
	Population	Other
	Geographic Areas Affected	CITY OF TRENTON RESIDENTS
	Associated Goals	Planning and Administration
	Description	Administration of the CDBG, HOME, and ESG programs including outreach, coordination, oversight, and reporting.
	Basis for Relative Priority	Planning and administration is needed to have a robust and successful program.
	Geographic Areas Affected	City-wide CDBG-eligible areas
	Associated Goals	Planning and Administration

Table 48 – Priority Needs Summary

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Increasingly higher market-rate rents relative to average wages in the City of Trenton limit access to rental housing, making TBRA appropriate. The City will fund TBRA with HOME funds and provide Rapid Re-housing for the homeless with ESG funds.
TBRA for Non-Homeless Special Needs	The local housing market provides an inadequate supply of rental housing, affordable and suitable to special-needs populations, particularly the elderly and persons with disabilities and/or substance abuse issues. Generally, special needs households are more likely to have extremely low incomes and experience associated housing problems, and the cost of appropriate housing and supportive services can be prohibitive.
New Unit Production	Much of the existing housing stock is old and no longer suitable for rehabilitation. Rising housing prices combined with stagnant incomes (in inflation-adjusted dollars in recent years), make a strong case for the need to create additional units of affordable housing.
Rehabilitation	Like most of the nation, the City is currently experiencing a shortage of affordable and available units for extremely low-, low-, and moderate-income homeowners. Keeping housing affordable by providing owner- and renter-occupied rehabilitation services is an effective way to maintain decent and affordable housing in the community.
Acquisition, including preservation	Acquisition of property may be necessary over the next five years to advance critical redevelopment projects.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Trenton anticipates a total allocation of \$2,527,173 in CDBG funding, \$909,830.67 in HOME funding, and \$235,430 in ESG funding for the 2025-2026 program year. Program income may be realized over the course of the 2025-2026 program year and subsequent program years. These funds will be used for CDBG-eligible activities consistent with the current goals and objectives identified in the Five-Year Consolidated Plan. CDBG funds will be used for housing and community development activities including, but not limited to, increasing homeownership, providing existing homeownership assistance (e.g., housing rehabilitation), public services, code enforcement/blight removal, public improvements, and administration of the City's CDBG program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public/ Federal	Admin and Planning Housing Public Improvements Public Services	\$2,527,173	\$0	\$0	\$2,527,173	\$10,108,692	Block grant from HUD to address housing, community development and economic development needs in the City. The expected amount available is four times the year one allocation.
HOME	Public/ Federal	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA Administration	\$909,830.67	\$0	\$0	\$909,830.67	\$3,639,322.68	Grant from HUD to address housing rehabilitation and development. The expected amount available is four times the year one allocation.
ESG	Public/ Federal	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	\$235,430	\$0	\$0	\$235,430	\$941,720	Grant from HUD to address needs of persons who are homeless. The expected amount available is four times the year one allocation

Table 50 - Anticipated Resources

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

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

available, from Community Housing Development Organizations (CHDOs), Public Housing Authority (PHA), or other agencies and programs against CDBG, HOME, and ESG dollars.

The Emergency Solutions Grant Program and the HOME Program require matching funds. All applicants to these programs must identify the match in the applications for funding. All matching sources are verified prior to commitment of any federal funds. Specific matching requirements will be met as follows:

- HOME: The City of Trenton has a 100% match reduction due to Trenton's distressed status; however projects that leverage other funds will be rated more highly in the City's evaluation process.
- ESG: The City must provide a 1:1 match for funding provided from the Emergency Solutions Grant Program. Match funds are provided by subgrantees.

The City and THA have been awarded a Choice Neighborhood Planning Grant. CDBG funds are also leveraging the Choice Neighborhood Grant through funds allocated for housing rehabilitation, public infrastructure improvements and blight reduction.

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

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

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

The City of Trenton has identified an institutional structure through which it will carry out its affordable and supportive housing strategy. The structure includes City Departments and organizations from several backgrounds. These organizations represent private firms, local, nonprofit agencies, and local and state agencies.

The support of public, private, and non-profit organizations is particularly important, and collaborating with them will be the focus of the institutional approach to meeting the needs identified in this plan. A list of such organizations is provided below.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Trenton Department of Housing and Economic Development	Government	Affordable housing-ownership, Affordable housing-rental, Non-homeless special needs, Community development: public facilities, Community development: neighborhood improvements, community development: public services, community development: economic development	City
City of Trenton Department of Health and Human Service	Government	Homelessness	City
Trenton Housing Authority	PHA	Public housing	City
Mercer County Human Services Dept.	Government	Homelessness	Other-County
Trenton/Mercer Continuum of Care	Non-profit organizations	Homelessness	Other-County

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The Department of Health and Human Services is responsible for administering CDBG, HOME, and ESG funding, while the Department of Housing & Economic Development plays a supportive role. These divisions and departments carry out objectives related to housing and community development. Furthermore, multiple nonprofit organizations provide a range of public services, from programs to reduce homelessness to programs for non-homeless special needs populations. The Trenton/Mercer Continuum of Care (COC) is a federally mandated body of homeless service providers. The COC works in partnership with the United States Department of Housing and Urban Development (HUD) towards the

common goal of ending homelessness in the United States within 10 years. Each year the Trenton/Mercer COC applies for funding to support local efforts to prevent and end homelessness.

The City of Trenton has identified an institutional structure through which it will carry out its affordable and supportive housing strategy. The structure includes organizations from several backgrounds. These organizations represent private firms, local, and nonprofit agencies, and local and state agencies.

The support of public, private, and non-profit organizations is particularly important, and collaborating with them will be the focus of the institutional approach to meeting the needs identified in this plan. A list of such organizations is provided below in Table 52.

Table 52 shows the institutional structure through which the City of Trenton will carry out its Strategic Plan. Although not every organization involved in the delivery program is included in Table 52, the lead agency and other organizations presented show the breadth of delivery capacity within the City.

The Trenton Housing Authority will continue to provide assistance to renter households through its public housing programs. Additionally, the Trenton Housing Authority provides necessary support services to renters, including elderly renters, when available.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics		X	
Other Street Outreach Services	X		

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	
Life Skills			
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			
Food Banks/Nutrition Programs	X	X	

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Continuum of Care services for the homeless in the City of Trenton are delivered through a consortium of nonprofit providers, faith-based organizations, and governmental agencies. These agencies provide homeless prevention, rapid re-housing, emergency shelter, transitional housing, and permanent supportive housing. Other local agencies provide food, shelter, and health care for the chronically homeless.

Trenton/Mercer CoC develops partnerships in Trenton and Mercer County, including providing financial support, leading to the creation of stable and vibrant neighborhoods and communities. Specific services that these agencies provide are wide-ranging and include but are not limited to legal services, financial literacy, housing counseling, permanent/transitional/supportive housing, mental health services, foreclosure prevention, homeless prevention, case management, job training, and self-sufficiency programs.

The Trenton/Mercer COC provides a coordinated point of entry (Coordinated Entry and Assessment System (CEASE)) to access housing and community services for homeless individuals. Through a coordinated assessment process, the needs of the homeless are identified and prioritized and a plan to move from homelessness to housing is developed. The goal of this system is to prioritize chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs. Referrals are made for those who are near homeless and require services to prevent homelessness as well. The support services, shelters, and other housing providers described above and in MA-30 work to ensure the best possible outcome for these households as quickly as possible. For homeless households with children, a centralized intake is in place at the Mercer County Board of Social Services that seeks to mediate/prevent homelessness whenever possible and reduce the length of time families are homeless through rapid rehousing - a model that places a priority on moving a family experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of a family becoming homeless. A Universal screening Tool is used to identify and prioritize families for

services with the primary goal of returning the family to permanent housing.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The City of Trenton, the Mercer County Department of Human Services and the Mercer County Board of Social Services have been pursuing a planning and implementation process centered around the Mercer County Ten-Year Plan to End Homelessness that was developed by the Mercer Alliance to End Homelessness. The coordination between the lead agencies and those that provide services is a strength of the system.

The two gaps in the system, identified by stakeholders, are a lack of affordable housing and psychological services. Households are beginning to remain in shelters longer due to a shortage of emergency housing options. Another problem is that the capacity of the system is, at times, inadequate to meet the demand for shelter. By keeping people longer, shelter beds are not available to new people. Several service providers have added their clinical psychologists to make up for the lack of availability of services for low-income households.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City will continue to provide funding for the creation of affordable housing through CDBG and HOME funds. Another important strategy that will be undertaken with CDBG funds is career training and developing work/life skills to support employment. Increasing income will expand housing options. Expanding the supply of good-paying jobs through economic development is a goal of the City's Trenton 250 Master Plan.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Affordable Housing	2025	2029	Affordable Housing	CITY OF TRENTON RESIDENTS	Create and Maintain Affordable Housing	CDBG: \$1,000,000 HOME: \$4,094,238.35	Rental units constructed: 4 Household Housing Unit New affordable units for rental or resale- 12 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit Direct Financial Assistance to Homebuyers: 52 Households Assisted
Blight Removal	2025	2029	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Eliminate Blight	CDBG: \$2,500,000	Buildings Demolished: 32 Buildings
Improve Public Facilities	2025	2029	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Improve Public Facilities	CDBG: \$4,633,320	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 369,600 Persons Assisted

Enhance Public Services	2025	2029	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Provide Public Services	CDBG: \$1,975,375	Public service activities other than Low/Moderate Income Housing Benefit: 4,100 Persons Assisted
Provide Housing And Services To Persons Who Are Homeless	2025	2029	Homeless	CITY OF TRENTON RESIDENTS	Provide Homeless Housing and Services	ESG: \$1,177,150	Homeless Person Overnight Shelter: 6,000 Persons Assisted Homelessness Prevention: 64 Persons Assisted
Planning and Administration	2025	2029	Planning and administration	CITY OF TRENTON RESIDENTS	Planning and administration	CDBG: \$2,527,170 HOME: \$454,915	Other: 5 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	<p>Continue the housing rehabilitation, first-time homebuyer, and new housing construction activities to maintain existing housing and to support an increase in the number of affordable units in the City of Trenton.</p> <ul style="list-style-type: none"> • Support and improve partnerships and programs that reduce housing vacancies and strengthen neighborhoods. • Expand affordable homeownership opportunities for all households by maintaining and expanding existing homeownership opportunities. • Support City-wide emergency repair for owner-occupied income-qualified owners throughout the City. • Diversify the City's housing stock, including the development of rental housing, to allow anyone to make Trenton their home.
2	Goal Name	Blight Removal
	Goal Description	<p>The City of Trenton will promote neighborhood revitalization and activities to enhance the quality of life for residents in low- and moderate-income areas. The City of Trenton seeks to improve the sustainability of suitable living environments by acquiring strategically located buildings for redevelopment.</p>
3	Goal Name	Improve Public Facilities
	Goal Description	<p>The City of Trenton will have a network of comprehensive community facilities and services provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner.</p> <ul style="list-style-type: none"> • Provide parks, open space, and recreation infrastructure that both meets the needs of the community and is maintainable by the City and its community partners.
4	Goal Name	Enhance Public Services
	Goal Description	<p>Support non-housing community development supportive services</p> <ul style="list-style-type: none"> • Provide operating support for the Trenton Senior Centers • Strengthen the educational attainment of youth. • Promote literacy programs. • Provide services to residents to improve skills and increase access to employment opportunities.

5	Goal Name	Provide housing and services to Persons who are homeless
	Goal Description	Preservation of short- and long-term homeless facilities and associated services. <ul style="list-style-type: none"> • Increase housing stock/options that are affordable to extremely low-income households. • Develop an inventory of interim housing units for those whom a “Housing First” strategy is inappropriate (such as the chronically homeless, people in recovery or families fleeing an immediate domestic violence situation). • Increase permanent supportive housing with appropriate and available services and supports. • Link interim housing consumers to placement in permanent housing as soon as is practical for the client.
6	Goal Name	Planning and Administration
	Goal Description	Planning and administration of the CDBG, HOME, and ESG programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City provides CDBG and HOME funds for several housing programs, all of whom will be low- to moderate-income households.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

To ensure equal opportunity in housing for all Trenton residents, THA undertakes affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability. THA also undertakes affirmative measures to ensure accessible housing is available to persons with all varieties of disabilities regardless of the unit size required.

Activities to Increase Resident Involvements

The Trenton Housing Authority participates in the Family Self-Sufficiency Program (FSS). This program promotes self-sufficiency and goal-setting among participants. The mission of the program is to help THA residents set and achieve short- and long-term goals, one family at a time. THA's 5-Year Plan identified promoting self-sufficiency among residents through linking residents to employment and education opportunities, promoting homeownership and financial literacy, promoting healthy and active lifestyles, increasing enrollment in early childhood education, and providing opportunities to residents to pursue careers in construction and related fields.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Trenton, New Jersey, faces several interconnected barriers to affordable housing that impact both the availability and quality of housing options for low- and moderate-income residents.

Shortage of Affordable Units - There is a significant deficit of affordable rental units for extremely low-income households in New Jersey. Statewide, there is a shortage of over 205,000 rental homes affordable and available for extremely low-income renters. In Trenton, this shortage is exacerbated by a suppressed housing market, limited desirable market-rate housing, and a lack of quality affordable housing, making it challenging for residents to find suitable accommodations.

Regulatory and Zoning Challenges - Municipal zoning practices and regulatory frameworks have historically hindered the development of affordable housing. Exclusionary zoning, such as restrictive land-use regulations, can limit where affordable housing can be built. Additionally, the dissolution of the Council on Affordable Housing (COAH) in 2024 has left municipalities without a centralized agency to guide affordable housing obligations, leading to legal uncertainties and delays in housing development.

Economic Constraints and Funding Limitations - High construction costs, coupled with limited funding for affordable housing projects, pose significant challenges. Developers often face financial hurdles in building affordable units, especially when subsidies or incentives are insufficient. Furthermore, the expiration of court-approved affordable housing plans without legislative action has led to protracted legal battles, diverting resources away from housing development.

Community Opposition and Legal Disputes - Efforts to expand affordable housing often encounter resistance from local communities concerned about potential impacts on property values, school capacities, and community character. Such opposition can lead to legal disputes and delays in project approvals. For instance, nine towns have challenged New Jersey's affordable housing law, arguing that it imposes excessive mandates without fully considering local conditions and resources.

Quality and Maintenance Issues - Beyond availability, the quality of existing affordable housing stock is a concern. Poor housing conditions in Trenton have led to negative health effects, low educational outcomes, and high social and economic costs for community members. Addressing these issues requires not only building new units but also investing in the maintenance and rehabilitation of existing housing.

Addressing these barriers necessitates a multifaceted approach, including policy reforms, increased funding, community engagement, and strategic planning to ensure that affordable housing is both available and of high quality for Trenton residents.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

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

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Emergency Solutions Grant funds are used to fund Street outreach to engage unsheltered homeless people in services. The City will continue to fund this service.

The Trenton/Mercer Coordinated Assessment System has a process for addressing the needs of homeless individuals and families.

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

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

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

- Outreach Assessments
- Prevention of Homelessness
- Emergency Shelter/Services
- Rapid Rehousing
- Transitional Housing

- Case management/Support Services
- Permanent Housing
- Education Resources

Addressing the emergency and transitional housing needs of homeless persons

The agencies in Trenton provide an array of Shelter and Transitional housing facilities. Approximately 95% of homeless housing and service providers are located in the City.

Emergency Shelters and Services

Anchor House	Basic Center Program
Division of Child Permanency and Protec	Hotel/Motel Placements
Home Front	Fresh Start
Home Front	Family Preservation Center
Home Front	Gateway
Mercer County Board of Social Services	Hotel/Motel Placements
Rescue Mission	Rescue Mission
Womanspace, Inc.	Emergency Shelter

Transitional Housing

Anchor House	Anchor Line
Anchor House	Anchorage
Helping Arms	Escher Street Transitional Housing
Home Front	TLC
Lifeties	Mary's Place
Rescue Mission	Transitional Housing Program

Volunteers of America	Amani House
Womanspace, Inc.	Barbara's House

The City is supporting emergency shelters operations with funding from the Emergency Solutions Grant Program.

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

The Trenton/Mercer CoC, led by the City of Trenton, has made great strides in helping families and individuals move from homelessness to housing. The coordinated entry system, CEASe System, prioritizes the most vulnerable persons experiencing homelessness in the community by utilizing the prioritization policy established by the CoC. The goal is to move those designated with the highest priority to housing within 30 days. The Trenton/Mercer CoC uses a hybrid Coordinated Entry (CE) model that combines multiple access points within a centralized coordination and referral system through various community-based entry points. All referrals and housing placements are coordinated centrally to ensure consistency, prioritization, and compliance with HUD requirements. All individuals, both sheltered and unsheltered, are screened and assessed and a housing plan is developed based on the person's homeless history and level of need, with priority given to the chronically homeless.

The City will continue to prioritize rapid re-housing to move families from shelter to permanent housing. Those who have received rapid re-housing funds have been very successful at remaining stably housed. Since the CoC transitioned to a rehousing service model 94% of families that were rehoused did not become homeless again. Pilot projects targeting a single population, during the same period of time, show similar success with 98.5% of participants not returning to homelessness.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs

Discharge planning is key to closing the front door on homelessness. For those in the criminal justice system, the Trenton/Mercer CoC worked with the New Jersey Policy Academy to develop the State's discharge plan. The vision for this plan is one that plans for greater coordination of services and programs required to address homelessness in New Jersey including the promotion of prevention strategies and services to prevent

homelessness and reduce the risk of homelessness for families and individuals.

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

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

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Trenton has older housing stock compared to many other urban regions in the United States, thus the exposure of lead-based paint hazards poses a high risk. Lead was used as a pigment and drying agent in “alkyd” oil-based paint in most homes built before 1978. It can be present on any interior or exterior surface- particularly woodwork, doors, and windows. CHAS data estimates that nearly 1,000 units occupied by lower-income households with children pose a health risk related to the presence of lead.

The City received a Lead-based Paint Hazard Control grant through the HUD Healthy Homes office. Housing units where young children visit or reside will be made lead safe.

One of the goals of the Healthy Homes program and the use of CDBG and HOME federal funds is to improve and expand the housing stock, including the inventory of housing units that are lead safe. The City will:

- continue to meet HUD lead-based paint standards in housing rehabilitation programs;
- expand the stock of lead safe housing through housing initiatives;
- obtain training for program staff on lead hazard evaluation and reduction;
- establish relationships with lead professionals and key partners such as risk assessors and clearance technicians, public health professionals and HUD lead grantees; and
- The City codes department will continue to address the requirement that contractors received EPA training and provide proper notices to occupants prior to rehabilitation activities.
- The City's Division of Health will continue programs such as screening children for elevated lead levels, and placing property owners under court notice to have lead removed from the 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

How are the actions listed above related to the extent of lead poisoning and hazards?

These actions will not address all units that have lead-based paint but will increase awareness about lead-based paint hazards and continue the decline in the number of children exposed to lead hazards.

How are the actions listed above integrated into housing policies and procedures?

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

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

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

- Providing financial support to organizations offering necessary services such as food, senior services, and counseling programs for extremely low-income persons.
- Continued assistance to extremely low-income owner-occupied households with the improvement of their residences through the CDBG-funding housing rehabilitation.
- Providing homeownership programs to support homeownership and the accumulation of equity.
- Lead-based paint abatement through community partners to address child lead poisoning, which can impact future employment and earning capabilities.
- Funding infrastructure improvements (streets, water mains, sidewalks, etc.) to enhance and beautify neighborhoods, thus increasing property values and raising residents' pride in their community.
- Encouraging the introduction of economic development opportunities into distressed and impoverished areas.
- Providing financial support to organizations who provide referrals and assistance to special needs persons.
- Continuing to fund agencies that provide financial counseling to allow residents to establish/repair credit, empowering those residents to gain a better financial future.
- Economic development programs aimed at developing job training and employability.
- Supporting youth and childcare programs, which provide mentoring and role models for children while helping parents secure employment.
- Maximize investments under the Choice Neighborhood Planning Grant to create more strategic opportunities in key planning areas

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Reducing poverty enables families to move towards self-sufficiency and increases their ability to afford housing. The City's anti-poverty strategy works towards the goal of enabling every family to afford decent housing in suitable living environments. As noted in the Needs Assessment of this Consolidated Plan, cost burden (paying more than 30% of household income for housing) is the most common housing problem for low- and moderate-income residents and is especially common among extremely low-income residents.

To the extent possible given its limited resources, the City will continue to support organizations that provide supportive services to encourage local economic development and to preserve and improve affordable housing options as part of its strategy to prevent and alleviate poverty. By combining job creation and workforce development activities with efforts to increase the supply of affordable housing, fewer residents will experience a housing cost burden. The City will continue to pursue and support various economic development and housing activities to provide an environment that will attract or retain businesses or facilitate the expansion of existing businesses thereby securing employment and increased incomes for City residents.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City is working to improve its monitoring system to ensure that activities funded with CDBG, HOME, and ESG meet the federal requirements for the grant programs. Monitoring procedures have been finalized which include the following components:

- Establishment of a monitoring schedule that requires monthly desk reviews and annual on-site monitoring
- Risk-based assessment to determine the need for more intensive monitoring
- Written notification of and documentation of City actions to sub-recipient
- Clear delineation of documentation required to support findings
- Standardized monitoring forms
- Use of HUD exhibits as part of the annual sub-recipient monitoring review
- Procedures for storage of monitoring records

Each sub-recipient activity funded under CDBG or ESG is monitored to ensure the agency is meeting all the requirements of the program and must follow procurement policies that include outreach to MBE/WBE firms. The City has not had an active HOME project for some time and is working on developing a monitoring system to ensure compliance with previously funded projects.

All activities will be monitored on both an on-going basis through construction or service drawdown requests and via on-site visits to verify information and our complete wage monitoring requirements.

Fiscal monitoring of activities includes the review and approval of activity budgets, compliance with executed grant agreements, and review and approval of vouchers.

Staff attend meetings with contractors for construction and rehabilitation activities to ensure their compliance with HUD requirements and inspections are conducted as work progresses. All subgrantees must follow competitive bidding practices and include outreach to MBE/WBE vendors in their process. Their efforts are monitored before the award of contracts.

Site visits are made to public service providers on an annual basis to review program activity and fiscal and regulatory compliance. Activity files are maintained with the necessary documentation. The Community Development staff visits agencies funded through Community Development Block Grant to ensure compliance with national objectives and applicable program requirements.

When an activity is completed, the file will be reviewed to assure that the activity meets the proposed accomplishments, and that all pertinent and mandated documentation are included.

To ensure long-term compliance for HOME projects, the City will verify the tenant's income upon lease-up, ensure the developer has verification procedures in place as well, and conduct on-site monitoring through construction, upon completion, one year after lease-up and every three years thereafter. This monitoring enables staff to ensure compliance with the following:

- Period of affordability
- Income of tenants and source documentation
- Amount of rent charged
- Housing quality standards of the facility

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

Introduction

The City of Trenton anticipates a total allocation of \$2,527,173 in CDBG funding, \$909,830 in HOME funding, and \$235,430 in ESG funding for the 2025-26 program year. Program income may be realized over the course of the 2025-2026 program year and subsequent program years. These funds will be used for CDBG and HOME-eligible activities consistent with the current goals and objectives identified in the Five-Year Consolidated Plan. CDBG funds will be used for housing and community development activities including, but not limited to, increasing homeownership, providing existing homeownership assistance (e.g., housing rehabilitation), public services, blight removal, public improvements, and administration of the City's CDBG program.

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

The Annual Action Plan must summarize the City's priorities and the specific goals it intends to initiate and/or complete within the first-year of the Strategic Plan. These goals must be described in quantitative terms. The City of Trenton has selected goal outcome indicators and quantities

based on the anticipated performance measures of the 2025-26 Annual Action Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public/ Federal	Admin and Planning Housing Public Improvements Public Services	\$2,527,173			\$2,527,173	\$10,108,692	Block grant from HUD to address housing, community development and economic development needs in the City. The expected amount available is four times the year one allocation.
HOME	Public/ Federal	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA Administration	\$909,830			\$909,830	\$3,639,320	Grant from HUD to address housing rehabilitation and development. The expected amount available is four times the year one allocation.
ESG	Public/ Federal	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	\$235,430			\$235,430	\$941,720	Grant from HUD to address needs of persons who are homeless. The expected amount available is four times the year one allocation

Table 54 - Expected Resources – Priority Table

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

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

The Emergency Solutions Grant Program and the HOME Program require matching funds. All applicants to these programs must identify the match in the applications for funding. All matching sources are verified prior to commitment of any federal funds. Specific matching requirements will be met as follows:

- HOME: The City of Trenton has a 100% match reduction due to Trenton's distressed status; however projects that leverage other funds will be rated more highly in the City's evaluation process.
- ESG: The City must provide a 1:1 match for funding provided from the Emergency Solutions Grant Program. Match funds are provided by subgrantees.

The City and THA have been awarded a Choice Neighborhood Planning Grant. CDBG funds are also leveraging the Choice Neighborhood Grant through funds allocated for housing rehabilitation, public infrastructure improvements, and blight reduction.

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

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Affordable Housing	2025	2026	Affordable Housing	CITY OF TRENTON RESIDENTS	Create and Maintain Affordable Housing	CDBG: \$200,000 HOME: \$818,847.67	Rental units constructed: 1 Household Housing Unit New affordable units for rental or resale- 3 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 13 Households Assisted
Blight Removal	2025	2026	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Eliminate Blight	CDBG: \$500,000	Buildings Demolished: 8 Buildings

Improve Public Facilities	2025	2029	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Improve Public Facilities	CDBG: \$926,664	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 92,400 Persons Assisted
Enhance Public Services	2025	2029	Non-Housing Community Development	CITY OF TRENTON RESIDENTS	Provide Public Services	CDBG: \$395,075	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
Provide Housing And Services To Persons Who Are Homeless	2025	2029	Homeless	CITY OF TRENTON RESIDENTS	Provide Homeless Housing and Services	ESG: \$235,430	Homeless Person Overnight Shelter: 1500 Persons Assisted Homelessness Prevention: 16 Persons Assisted Other - Street outreach: 5
Planning and Administration	2025	2029	Planning and administration	CITY OF TRENTON RESIDENTS	Planning and administration	CDBG: \$505,434 HOME: \$90,983	Other: 1 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	<p>Continue the housing rehabilitation, first-time homebuyer, and new housing construction activities to maintain existing housing and to support an increase in the number of affordable units in the City of Trenton.</p> <ul style="list-style-type: none"> • Support and improve partnerships and programs that reduce housing vacancies and strengthen neighborhoods. • Expand affordable homeownership opportunities for all households by maintaining and expanding existing homeownership opportunities. • Support City-wide emergency repair for owner-occupied income-qualified owners throughout the City. • Diversify the City's housing stock, including the development of rental housing, to allow anyone to make Trenton their home.
2	Goal Name	Blight Removal
	Goal Description	<p>The City of Trenton will promote neighborhood revitalization and activities to enhance the quality of life for residents in low- and moderate-income areas. The City of Trenton seeks to improve the sustainability of suitable living environments by acquiring strategically located buildings for redevelopment.</p>
3	Goal Name	Improve Public Facilities
	Goal Description	<p>The City of Trenton will have a network of comprehensive community facilities and services provided by the City, non-profit organizations, and other local partners in a coordinated and collaborative manner.</p> <ul style="list-style-type: none"> • Provide parks, open space, and recreation infrastructure that both meets the needs of the community and is maintainable by the City and its community partners.
4	Goal Name	Enhance Public Services
	Goal Description	<p>Support non-housing community development supportive services</p> <ul style="list-style-type: none"> • Provide operating support for the Trenton Senior Centers • Strengthen the educational attainment of youth. • Promote literacy programs. • Provide services to residents to improve skills and increase access to employment opportunities.

5	Goal Name	Provide housing and services to Persons who are homeless
	Goal Description	<p>Preservation of short- and long-term homeless facilities and associated services.</p> <ul style="list-style-type: none"> • Increase housing stock/options that are affordable to extremely low-income households. • Develop an inventory of interim housing units for those whom a “Housing First” strategy is inappropriate (such as the chronically homeless, people in recovery or families fleeing an immediate domestic violence situation). • Increase permanent supportive housing with appropriate and available services and supports. • Link interim housing consumers to placement in permanent housing as soon as is practical for the client.
6	Goal Name	Planning and Administration
	Goal Description	Planning and administration of the CDBG, HOME, and ESG programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Trenton’s FY 2025 Annual Action Plan is based on the needs identified in the Five-Year Consolidated Plan. The City anticipates that 100% of its CDBG resources this year, other than those allocated for administration/planning, will be spent to benefit low- and moderate-income residents.

Projects

#	Project Name
1	Senior Center Operations 2025
2	City Park Improvements 2025
3	Public Facility Improvements 2025
4	First-Time Homebuyer Assistance
5	Housing Rehabilitation
6	Demolition 2025
7	ESG Homeless Activities 2025
8	HOME CHDO Set Aside
9	HOME Project
10	Administration 2025

Table 56 – Project Information

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

The primary obstacle to meeting underserved needs is limited resources to meet the competing demands. The City will continue to focus its CDBG funding on larger-scale public facility and infrastructure projects to address timeliness concerns. The City provided funding for its Senior Center operations, housing rehabilitation, first-time homebuyers programs, park improvements, public facilities improvements, and homeless prevention activities in FY 2025.

The City gave priority funding to projects that:

- Met the Consolidated Five-Year Housing and Community Development Plan Strategic Goals
- Can begin immediately and finish within the contracted time
- Demonstrated capacity and the capability to carry out the project successfully
- Have adequate community support, and address an identified community need
- Impact a significant number and/or percentage of low- and moderate-income persons
- Maximize the use of outside funds and services and coordinate with other public and private

efforts

- Help end homelessness and/or create connections with employment in the community.

AP-38 Project Summary

Project Summary Information

1	Project Name	Senior Center Operations 2025
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Enhance Public Services
	Needs Addressed	Enhance Public Services
	Funding	CDBG: \$395,075
	Description	Provide staffing and operations for senior centers in the City of Trenton.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 seniors will be served
	Location Description	Citywide
	Planned Activities	Operation expenses including staff salaries and fringe benefits.
2	Project Name	City Park Improvements 2025
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$250,000

	Description	The City's Recreation, Natural Resources and Culture Department will identify one or more parks and playgrounds that will be rehabilitated.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	84,000 households
	Location Description	Citywide
	Planned Activities	Rehabilitation of City parks and playgrounds.
	3 Project Name	Public Facility Improvements 2025
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Improve Public Facilities
	Needs Addressed	Improve Public Facilities
	Funding	CDBG: \$676,664
	Description	Public Facility improvements may include rehabilitation of City-owned public facilities, including libraries, learning centers and community/recreation centers. This category also includes road and infrastructure such as roads, water/wastewater, sidewalks and curbing reconstruction or rehabilitation. A comprehensive list of improvements was created and will be used to select projects over the next several years.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 8,400 households will benefit
	Location Description	Citywide

	Planned Activities	Rehabilitation of public facilities and infrastructure.
4	Project Name	First Time Homebuyer Assistance
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	CDBG: \$100,000
	Description	Financial assistance is provided in the form of housing counseling, closing cost assistance and a matching down payment to qualified first time homebuyers. Financial assistance is based on the buyer household income, assets, and homeowner history, an approved first mortgage loan terms and interest rate, meeting all program criteria, and the purchase of an eligible property in the City of Trenton.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	13 households
	Location Description	Citywide
	Planned Activities	Closing cost assistance, housing counseling, and matching down payment assisted qualified first-time homebuyers.
5	Project Name	Housing Rehabilitation
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	CDBG: \$100,000

	Description	Rehabilitation of income qualified owner-occupied units Citywide. Rehabilitation includes both interior and exterior urgent improvements in accordance with program guidelines.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	50 housing units will be rehabilitated
	Location Description	TBD
	Planned Activities	Single-family rehabilitations
	Planned Activities	Single-family rehabilitations
6	Project Name	Demolition 2025
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Blight Removal
	Needs Addressed	Clearance and Removal
	Funding	CDBG: \$500,00
	Description	The City of Trenton will promote neighborhood revitalization and activities to enhance the quality of life for residents in low- and moderate-income areas through demolition of properties identified as eligible for demolition
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	8 Households

	Location Description	Demolition 2025
	Planned Activities	Clearance and Removal
6	Project Name	ESG Homeless Activities 2025
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Provide Housing and Services to Persons Who Are Homeless Planning and Administration
	Needs Addressed	Provide Homeless Housing and Services Planning and Administration
	Funding	ESG: \$235,430
	Description	Provide funding to homeless prevention activities and services related to assisting and reducing homelessness: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, and (5) prevent families/individuals from becoming homeless. assistance for. The ESG program will provide assistance directly to those agencies associated with the helping the homeless persons living in the City including but not limited to: Emergency Shelters, Street Outreach, Homelessness Prevention, HMIS system support, and funding to City staff for administration of the ESG Program.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1500 shelter nights provided: 14 families with homeless prevention assistance
	Location Description	Various
	Planned Activities	Emergency Shelter, Homeless Prevention, HMIS, Admin

7	Project Name	HOME CHDO Set Aside
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	HOME: \$136,475
	Description	A certified CHDO organization interested in purchasing and rehabilitating homes in the City for resale to low and moderate income buyers
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1 low-income household
	Location Description	City of Trenton
	Planned Activities	Single-family rehabilitations.
8	Project Name	HOME Project
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Affordable Housing
	Needs Addressed	Create and Maintain Affordable Housing
	Funding	HOME: \$682,372.67
	Description	Development of new housing units and or substantial rehab of existing buildings to increase the number of affordable housing units.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 3 households will benefit.
	Location Description	City of Trenton
	Planned Activities	Housing development.
9	Project Name	Administration 2024
	Target Area	CITY OF TRENTON RESIDENTS
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$505,434 HOME: \$90,983
	Description	CDBG and HOME program administration
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	CDBG and HOME program administration

AP-50 Geographic Distribution – 91.220(f)

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

By federal regulation, 70% of CDBG funds must be spent in neighborhoods where at least 51% of the population is Low and Moderate Income (LMI). New Census Data issued by HUD Effective April 1, 2019, shows that portions of all census tracts in the City meet the LMI criteria with several exceptions: small portions of Census Tracts: 9, 12, 17 and 22 and Census Tract 13.

The Consolidated Plan noted there are clear patterns of racial segregation throughout the City. Census tract data American Community Survey (2019-2023) shows evidence of minority concentration with respect to both the African American and Latino populations.

Geographic Distribution

Target Area	Percentage of Funds
CITY OF TRENTON RESIDENTS	41
Choice Neighborhood North Trenton	59

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

- Meeting the statutory requirements of the CDBG program.
- Meeting the needs of very-low, low-, and moderate-income residents.
- Focusing on parks and infrastructure projects in low- and moderate-income neighborhoods.
- Coordinating and leveraging resources.
- Responding to expressed neighborhood needs.

Most of the planned activities are non-site specific such as housing rehabilitation, affordable housing development, homebuyers' assistance, public facility and park improvements, senior center assistance, accessibility projects, reducing homelessness City-wide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Trenton will use HOME funds and a portion of CDBG funds for new affordable housing and to rehabilitate existing housing units. The special needs population will be served by rehabilitating existing homeowner housing. Homeowners will be assisted through the Homeowner Rehabilitation program and First Time Homebuyer Assistance. HOME funds will be used to create new units of affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	14
Non-Homeless	67
Special-Needs	
Total	81

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	14
The Production of New Units	4
Rehab of Existing Units	50
Acquisition of Existing Units	13
Total	81

Table 59 - One Year Goals for Affordable Housing by Support Type

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

The CHDO set aside will fund 1 new or substantially rehabilitated unit using HOME funds. HOME funds will be used to create 3 new units of affordable housing. As many as 50 housing units will be rehabbed through the City's Housing Rehabilitation Program over the next several years. The First Time Homebuyers program will assist 13 families in acquiring a new home.

AP-60 Public Housing – 91.220(h)

Introduction

The Trenton Housing Authority builds and maintains safe, affordable, energy-efficient housing for residents in the City of Trenton.

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

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

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

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

The Trenton Housing Authority (THA) has created a plan to redevelop the distressed housing development, Donnelly Homes. THA intends to draw from its successful experience of revitalizing dilapidated housing through the HOPE VI program, while the City seeks to seamlessly incorporate Donnelly Homes into its 20-year master plan (Trenton 250) for Trenton's growth and development.

THA is also in the process of converting multiple public housing units to Project-Based Rental Assistance under the RAD conversion program.

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

THA has established a Resident Advisory Board. Tenants are recommended to this board by their property managers as a tenant who is involved in their residential community and is in good tenant standing with THA. The purpose of the RAB is to include THA residents in the THA's strategic planning and redevelopment efforts. The main role of the RAB is to make recommendations regarding the development of THA's Annual and Five-Year Plans and to provide input related to THA's public housing

redevelopment efforts.

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

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

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

Not applicable. The THA is not designated as troubled.

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

Introduction

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

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

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

The CEAS Center collaborates with community partners to link unhoused homeless individuals (unaccompanied by children) and unaccompanied youth between the ages of 18 – 21 to housing and housing related services. The CEAS Center also serves as a site where community agencies can provide services and facilitate the journey from homelessness to housing.

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

Trenton/Mercer CoC coordinates a broad array of services that includes but is not limited to: Outreach Assessments; Prevention of Homelessness; Emergency Shelter/Services; Rapid Rehousing; Transitional Housing; Case management/Support Services; Permanent Housing; and Education Resources.

A portion of the ESG funds will support Street Outreach efforts to provide services to the chronically homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

The agencies in the City provide an array of shelter and transitional housing facilities, although the latter are being phased out and converted to permanent housing. The City is supporting emergency shelters with support for operations. FY2025 ESG Funds have been allocated for shelter operations and essential

services and homeless prevention.

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

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

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

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

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

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

appropriate housing. Under current New Jersey child welfare reform legislation, several new programs have been implemented that allow for a more seamless transition from youth to adulthood. Many of these programs include permanent housing.

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

Introduction:

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

Trenton, New Jersey, faces several interconnected barriers to affordable housing that impact both the availability and quality of housing options for low- and moderate-income residents.

Shortage of Affordable Units - There is a significant deficit of affordable rental units for extremely low-income households in New Jersey. Statewide, there is a shortage of over 205,000 rental homes affordable and available for extremely low-income renters. In Trenton, this shortage is exacerbated by a suppressed housing market, limited desirable market-rate housing, and a lack of quality affordable housing, making it challenging for residents to find suitable accommodations.

Regulatory and Zoning Challenges - Municipal zoning practices and regulatory frameworks have historically hindered the development of affordable housing. Exclusionary zoning, such as restrictive land-use regulations, can limit where affordable housing can be built. Additionally, the dissolution of the Council on Affordable Housing (COAH) in 2024 has left municipalities without a centralized agency to guide affordable housing obligations, leading to legal uncertainties and delays in housing development.

Economic Constraints and Funding Limitations - High construction costs, coupled with limited funding for affordable housing projects, pose significant challenges. Developers often face financial hurdles in building affordable units, especially when subsidies or incentives are insufficient. Furthermore, the expiration of court-approved affordable housing plans without legislative action has led to protracted legal battles, diverting resources away from housing development.

Community Opposition and Legal Disputes - Efforts to expand affordable housing often encounter resistance from local communities concerned about potential impacts on property values, school capacities, and community character. Such opposition can lead to legal disputes and delays in project approvals. For instance, nine towns have challenged New Jersey's affordable housing law, arguing that it imposes excessive mandates without fully considering local conditions and resources.

Quality and Maintenance Issues - Beyond availability, the quality of existing affordable housing stock is a concern. Poor housing conditions in Trenton have led to negative health effects, low educational outcomes, and high social and economic costs for community members. Addressing these issues requires not only building new units but also investing in the maintenance and rehabilitation of existing housing.

Addressing these barriers necessitates a multifaceted approach, including policy reforms, increased funding, community engagement, and strategic planning to ensure that affordable housing is both available and of high quality for Trenton residents.

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

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

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

AP-85 Other Actions – 91.220(k)

Introduction:

In 2025, the City of Trenton plans the following actions to help address the housing and community development needs of City residents, especially low/moderate-income residents.

Actions planned to address obstacles to meeting underserved needs

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

In 2025, the City will continue to focus heavily on improving public facilities through road reconstruction projects and housing rehabilitation. The City will continue to improve staffing through additional training on CDBG, HOME, and ESG programs, providing the ability to maximize limited resources to address underserved needs.

Actions planned to foster and maintain affordable housing

The City of Trenton will continue to create and maintain affordable housing. The City will continue to support its goal of maintaining and expanding affordable housing by utilizing its CDBG and HOME allocations to create new opportunities for affordable rental and homeownership and rehabilitate existing affordable units.

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

HOME funds will be used to support creation of new rental units and to support a CHDO with a home

rehabilitation for resale.

Actions planned to reduce lead-based paint hazards

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

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

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

Actions planned to reduce the number of poverty-level families

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

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

establish/repair credit, empowering those residents to gain a better financial future.

- Economic development programs aimed at developing job training and employability.
- Supporting youth and childcare programs, which provide mentoring and role models for children while helping parents secure employment.

Actions planned to develop institutional structure

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

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

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

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

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

The Trenton/ Mercer CoC is a planning committee that reviews, evaluates, maintains, and develops ongoing strategies to address quality of life issues for the residents of Mercer County who may be homeless or in jeopardy of homelessness. The CoC has developed a system-wide approach for implementation of the HEARTH Act, which is to consolidate homeless assistance programs, codify the CoC planning process, and establish a goal of ensuring that families who become homeless return to permanent housing within 30 days.

In addition, the City of Trenton, Office of Adult and Family Services provides several services which address the needs of persons who are not homeless, disabled, mentally & physically ill and who require supportive housing. These services include: (a) rental assistance to families and individuals in order to prevent homelessness (b) intensive and comprehensive case management services (c) referrals to other social services agencies which include substance abuse, mental health counseling, medical and dental

services and educational and occupational training (e) referrals for emergency food, clothing and furniture (f) provide information for budget management, cleaning up personal credit, buying a home and preventing foreclosures.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	81.22%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:
5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)). *<TYPE=[text] REPORT_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>*
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
5. Describe performance standards for evaluating ESG.