City of Trenton, NJ

Citizen Participation Plan

US Department of Housing & Urban Development
Entitlement Programs

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Department of Housing and Economic Development

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INTRODUCTION

The purpose of the City of Trenton Citizen Participation Plan, pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, is to provide a written description of the process by which the citizens of Trenton, especially those living in low and moderate-income neighborhoods will be encouraged to participate and provide input in the development of the consolidated submission for Community Planning and Development program funding from the U.S. Department of Housing and Urban Development (HUD) for which the City of Trenton is currently entitled. The Plan presents the City's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

1. The Citizen Participation Plan
2. The Assessment of Fair Housing (AFH)
3. The Consolidated Plan (CP)
4. The Annual Action Plan (AAP)
5. The Consolidated Annual Performance and Evaluation Report (CAPER), and
6. The Section 108 Loan Guarantee Program

The City of Trenton receives three entitlement grants from the Federal Government to help address the City's housing, economic, and community development needs. The three grant programs are described below:

Community Development Block Grant Program (CDBG): Title I of the Housing and Community Development Act of 1974 (PL 93-383) created the CDBG program. It was re- authorized in 1990 as part of the Cranston-Gonzalez National Affordable Housing Act. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing and a suitable living environment and by expanding economic development opportunities for persons of low and moderate income.

HOME Investment Partnerships Program (HOME): HOME was introduced in the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance.

Emergency Shelter Grant (ESG): The ESG program is part of the homeless programs created by the McKinney Act. ESG has four primary objectives: (1) to improve the quality of existing emergency shelters for the homeless; (2) to provide additional emergency shelters; (3) to help meet the cost of operating emergency shelters; and (4) to provide certain essential social services to homeless individuals. The program is also intended to help reduce the number of people at risk of becoming homeless.

The Department of Housing and Economic Development (HED) is designated by the City of Trenton as the single point of contact with the U.S. Department of Housing and Urban Development (HUD), and lead agency for the grant administration of the CDBG, HOME, and ESG programs.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, and the CAPER. The City encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

NON-ENGLISH SPEAKERS

The City has determined that, based on 2017 American Community Survey data, nearly 1/3 (32.7%) of the City's population is Spanish speaking. Of these residents, 15,424 speak English less than very well.

Trenton City, Mercer County, New Jersey		
	Estimate	Margin of Error
Total:	27,752	+/-996
Speak only English	2,755	+/-513
Speak Spanish:	24,945	+/-1,045
Speak English "very well"	9,521	+/-706
Speak English "well"	4,815	+/-549
Speak English "not well"	8,161	+/-645
Speak English "not at all"	2,448	+/-479
Speak other language	52	+/-43

The most recent data on other language groups in the City is from 2000. These groupings are composites of several languages and the City has little contact with non-English speakers other than Spanish speakers when requesting city services.

Language Spoken at Home:	Number	Percent
Spanish	15,027	51.52%
Other Indo-European*	8,602	34.55%
Asian Language**	3,362	37.52%
Other Language	798	24.71%
Total	27,789	8.46%

*"Other Indo-European" excludes English and Spanish. "Indo-European" is not synonymous with "European." French, German, Hindi, and Persian are all classified as Indo-European. Hungarian, on the other hand, is lumped into "Other Language."
** "Asian Language" includes languages indigenous to Asia and Pacific islands areas that are not also Indo-European languages. Chinese, Japanese, Telugu, and Hawaiian are all classified here.
Also note that ability to speak English "very well" is based on the self-assessment of those responding to Census questions, not on a test of language ability.

The HUD threshold for providing language appropriate information about the program is 5% of the population or 1,000 people of a given language group. Therefore, the City will offer notices and other significant information about the program in Spanish.

To encourage these residents to participate in the development of the Analysis of Impediments to Fair Housing and the Consolidated Plan, the City will undertake the following initiatives in addition to publishing advertisements in the *Trenton Times* for these activities:

- At least one stakeholder interview or focus group session will be scheduled during the stakeholder consultation processes for both the Analysis of Impediments to Fair Housing and Consolidated Plan and will focus on persons with limited English proficiency, and
- The City will provide a Spanish version of meeting agendas, handouts and surveys at meetings and stakeholder interviews conducted for each planning process. The City will continue to include the following language in the published advertisements related to the development of these documents:

  La información será proporcionada en español a petición.
- The City will post and distribute Spanish-language notices to agencies that provide services to the Spanish-speaking community.

PERSONS WITH DISABILITIES

To encourage the participation of persons with disabilities, the City will include the following language in all its public meeting notices published in the *Times of Trenton,* a newspaper of general circulation.

> *The City of Trenton will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City at least three working days in advance of the meeting. Persons requiring information in alternative formats should contact the Community Development Office at (609) 989-3521 (TDD Users: 7-1-1 NJ Relay Center).*

The City will conduct all public meetings in locations that are handicapped-accessible, when available. If requested, the City will mail copies of public meeting notices to persons who are homebound and request such accommodation no less than seven days prior to the public meeting.

LOW- AND MODERATE-INCOME PERSONS

The primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing for decent housing, creating a suitable living environment, and providing economic opportunities for principally low- and moderate-income persons. In order to provide these opportunities, the City actively seeks to build partnerships in which those citizens most affected, participate in the development and implementation of the program.

The City of Trenton seeks citizen involvement in the strategies and actions to affirmatively further fair housing, identification of needs, setting priorities, allocating funding and assessing the success of established goals.

The City will conduct at least one public meeting during the development of the Analysis of Impediments to Fair Housing, the Consolidated Plan, and the Annual Action Plan in a census block group where the population is at least 51% of low- and moderate-income on as set by HUD.

ORGANIZATIONS AND AGENCIES

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

LOCAL PUBLIC HOUSING AGENCY

The City encourages, in consultation with Trenton Public Housing Authority (THA) the participation of residents of Section 8 Housing Choice Vouchers issued by the THA, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the Executive Director of PHA about the Analysis of Impediments to Fair Housing, its affirmatively furthering fair housing strategy, and Consolidated Plan activities related to housing developments and communities so the THA can make this information available at the annual public hearings required for its Public Housing Agency Plan.

The City encourages participation by THA stakeholders. This will be carried out by providing to the THA information on public meetings, surveys and other outreach initiatives related to the documents covered by this Plan.

PUBLIC INVOLVEMENT TECHNIQUES

The City will utilize traditional media for outreach to citizens and stakeholders including public hearings, publications in the newspaper of general circulation, community meetings, and the City's website.
To reach the broadest audience, the City may also use internet-based approaches such as email, social media, and online surveys, as well as stakeholder meetings and interviews, focus groups, or other methods that encourage citizen participation during the development and implementation process for the documents covered by this Citizen Participation Plan.

PLANNING ACTIVITIES SUBJECT TO CITIZEN PARTICIPATION PLAN

FIVE-YEAR CONSOLIDATED PLAN

The City of Trenton's Five-Year Consolidated Plan is developed through a collaborative process whereby the community establishes a unified vision for Trenton's community development actions. Citizen participation is a critical part of the Consolidated Plan, including developing and amending the plan as well as reporting on program performance. Consultations, public hearings, citizen surveys and opportunities to provide written comment are all a part of the strategy to obtain citizen input. The city will make special efforts to solicit the views of citizens who reside in the low-to-moderate income neighborhoods of Trenton, and to encourage the participation of all citizens including minorities, the non-English speaking population, and persons with disabilities. The steps for public participation in the five-year Consolidated Plan follow:

a. Consultations with Other Community Institutions

In developing the Consolidated Plan, the City will consult with other public and private agencies, both for-profit and non-profits that either provide or have direct impact on the broad range of housing, economic, health, and social services needed by Trenton residents. Consultations may take place through meetings, task forces or committees, or other means with which to coordinate information and facilitate communication. The purpose of these meetings is to gather information and data on the community and economic development needs of the community. The city will seek specific input to identify the needs of homeless persons, persons with HIV/AIDS and their families, persons with disabilities and other special needs.

Additionally, the City will consult with other public and private agencies including, but not limited to, the following:

- City of Trenton Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
- Community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities
- Broadband internet service providers and organizations engaged in narrowing the digital divide,
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies

When preparing the portion of the CP concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the City sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft CP and how to access a copy online for review and comment. In addition, the City will submit its non-housing community development plan to the New Jersey Department of Community Development.

A variety of mechanisms may be utilized to solicit input from persons, service providers, agencies and/or entities. These include written letters, telephone or in-person interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. The City may conduct online or in person surveys of Trenton residents in order to gather additional information on community priorities.

c. The City will conduct a minimum of two public hearings during the development of the Consolidated Plan, to gather information on community needs from citizens. These meetings will include special outreach to include organizations working with low-income populations.

The first hearing will be held at the beginning of the development process for the Annual Action Plan. The goal of this hearing will be to review the City's most recent CAPER report and obtain input from citizens on housing and community development needs and activities. During the meeting, the City will also address the priorities for non-housing community development needs including the development of proposed activities, the amount of assistance the City expects to receive (grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance. The citizen input during this meeting will directly shape the needs and priorities to be addressed by the spending plan in the Consolidated Annual Action Plan for the program year beginning July 1st of that year.

The second hearing will be held when the Draft Annual Action Plan has been completed and has been advertised as available for the required 30-day public review and comment period.

All public hearings will be advertised by publication prior to the hearing date in a newspaper of general circulation throughout the area(s) eligible to receive funds under the programs advertised. The first notice must be published no later than two weeks prior to the hearing date. All public hearing notices will also be posted on the City of Trenton's website (www.trentonnj.org/fedpublicnotices).

The City will consider any comments or views of citizens received in writing or orally at a public hearing. Each hearing will be held at facilities that are handicapped accessible. All locations will be convenient to potential and actual beneficiaries and will accommodate persons with disabilities.) Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. Public hearing notices will be translated into Spanish. It will be the responsibility of the residents to notify the City at least four days in advance of the hearing if interpreter services are needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City. In the course of developing their recommendation for a spending plan for the Annual Action Plan, the City may hold a series of additional public meetings

to both provide information on the solicitation of proposals and the review of all proposals for consideration for funding.

d. Written Comments
Based on public input and quantitative analysis, HED staff will prepare a draft Consolidated Plan, which also includes proposed allocation of first-year funding. A period of 30 calendar days will be provided to receive written comments on the draft Consolidated Plan. The public may review the draft plan at City Hall in the Department of Housing and Economic Development, and on the City's website at www.TrentonNJ.org. Notification of availability of the draft will appear in a local newspaper of general circulation as well as newspapers that target minority or special needs populations.

e. Final Action on the Consolidated Plan
All written or oral testimony provided will be considered in preparing the final Consolidated Plan. A summary of testimony received and the City's reasons for accepting or not accepting the comments must be included in the final document. The City will consider these comments, before taking final action on the Consolidated Plan. When approved by Council, the Consolidated Plan will be available on the City of Trenton's website, and available by request in the Department of Housing and Economic Development. The Mayor will submit to HUD, a letter authorizing the Plan no less than 45 days before the start of the City's five-year program cycle.

ANNUAL ACTION PLAN

Each year the City must submit an annual Action Plan to HUD, reporting on how that year's funding allocation for the three HUD entitlement grants will be used to achieve the goals outlined in the five-year Consolidated Plan.

a. HED staff will gather input from citizens and consultations to prepare the draft Action Plan. There shall be two public hearings to receive citizen input on the city's performance report for the preceding year and proposed Action Plan. The hearings provide the public's perspective on Trenton's housing and community and economic development needs. During the first meeting, the City will address the priorities for non-housing community development needs including the development of proposed activities, the amount of assistance the City expects to receive (grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance. The citizen input during this meeting will directly shape the needs and priorities to be addressed by the spending plan in the Consolidated Annual Action Plan for the program year beginning July 1st of that year.

b. HED staff will gather community input and statistical data to prepare the draft Action Plan. The second hearing will be held when the Draft Annual Action Plan has been completed and has been advertised as available for 30 days for public comment after reasonable notice to the public is given.

c. The City will consider these comments, before taking final action on the Consolidated Plan. When approved by Council, the Action Plan will be available on the City of Trenton's website, and available by request in the Department of Housing and Economic Development. The Mayor will

submit to HUD, a letter authorizing the Plan no less than 45 days before the start of the City's five-year program cycle.

SUBSTANTIAL AMENDMENTS TO CONSOLIDATED PLAN OR ANNUAL ACTION PLAN

Recognizing that changes during the year may be necessary to the Consolidated Plan and Action Plan after approval, the Citizen Participation Plan allows for "substantial amendments" to plans. These "substantial amendments" apply only to changes in CDBG funding allocations. Changes in funding allocation for other HUD grant programs received by the City of Trenton -- HOME, and ESG are not required to secure public review and comment.

REVISIONS TO THE CONSOLIDATED PLAN

There are two types of amendments that may occur with the Consolidated Plan: minor amendments and substantial amendments. An amendment to the approved Consolidated Plan is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When there is a change in the priorities identified in the Consolidated Plan

REVISION TO THE ANNUAL ACTION PLAN

There are two types of amendments that may occur with the annual Action Plan: minor amendments and substantial amendments. An amendment to the approved annual Action Plan is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When a change occurs in the purpose, scope, location, or beneficiaries of a previously approved activity
- When a 25 percent change in federal funding allocations to approved eligible activities occurs

All other changes to funding allocations to approved eligible activities that do not meet the criteria defined above will be considered minor amendments and will not be subject to public comments. These changes will be fully documented and sent to City Council for approval. The City may choose to submit a copy of each amendment to the Consolidated Plan or annual Action Plan to HUD as it occurs, or at the end of the program year.

The City of Trenton will hold a public hearing on such an amendment and will provide notification of the proposed amendment not less than 30 calendar days. The public hearing will follow all the protocol and procedures detailed in the Public Notice section below. If the amendment is adopted, the change will be incorporated into the Plan, along with a summary of comments on the amendment and the City's response to such comments.

PUBLIC DISPLAY AND COMMENTS

a. The City will draft the amendment and publish a brief summary of the proposed substantial amendment(s) by advertising the amendment in the local newspaper and identify where the amendment(s) may be viewed

b. The advertisement will begin a 30-day written citizen review and public comment period.

c. During the 30-day comment period, the City will consider any comments or reviews of citizens received in writing or orally during the comment period.

d. Upon approval by the City Council, the substantial amendment and comments will be posted on the City's website and made available for viewing in HED by request. The Mayor will submit to HUD, a letter authorizing the amendment.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

At the end of each program year, as required by HUD, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by September 30th. The CAPER gives an actual account of activities, which occurred during the previous program year, and how the City maintained and expended funds, which were outlined in the annual Action Plan for that program year. The CAPER preparation and submittal process includes:

a. HED staff prepares the draft CAPER.

b. After reasonable notice is provided in the local newspaper and City's website with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Plan, the CAPER will be on display for a period of not less than 15 days for public review and written comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD.

c. The final CAPER and public comments will then be submitted to HUD within 90 days following the end of the City's program year.

d. The CAPER and public comments will be presented at one of the public hearings on the proposed Action Plan for the subsequent fiscal year.

SECTION 108 LOAN GUARANTEE PROGRAM

Applications for assistance filed by the City of Trenton for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

a. Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the

range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

b. The advertisement will begin a 30-day written citizen review and public comment period.

c. During the 30-day comment period, the City will consider any comments or reviews of citizens received in writing during the comment period prior to consideration and submission to HUD and may be done concurrently with the public review and comment process for the Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final application for submission to HUD.

d. Upon approval by the City Council, the Section 108 Loan Application and comments will be posted on the City's website and made available for viewing in HED by request. The Mayor will submit the Section 108 Loan Application to HUD.

AMENDMENTS TO CITIZEN PARTICIPATION PLAN

In the event that changes to this Citizen Participation Plan are necessary, the HED staff shall draft them. The City will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

a. After reasonable notice, the draft Amended Plan will be made available to the public for a 15-day period for written comments.

b. The City will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

c. Following the public hearing, the Plan will be presented to Council of the City of Trenton for consideration and formal action.

d. Upon approval by the City Council, the substantial amendment and comments will be posted on the City's website and made available for viewing in HED by request. A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

GENERAL REQUIREMENTS

PUBLIC NOTICE

The City of Trenton will provide advanced public notice once any of the following documents is available: the proposed Annual Action Plan or Consolidated Plan, any proposed Substantial Amendment, and the Annual Performance Report. In addition, the City will provide public notice of all public hearings related to the funds or to the planning processes covered by this Citizen Participation Plan.

Advance notice of any public hearing will be provided to the public on the City's web page: www.TrentonNJ.org/fedpublicnotices, advertisements in local newspaper for general circulation and to minorities no less than seven days before the public review and comment period commences or the public hearing is held. The newspaper of general circulation is the *Trenton Times.* Notice shall also be provided to neighborhood organizations, public housing resident groups, religious organization in lower income neighborhoods, and agencies providing services to lower income persons. A mailing list shall be maintained for all interested parties so that they can be provided notices, as they become available.

PUBLIC HEARINGS

The City will provide for at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. The purpose of public hearings will be to allow citizens, public agencies, and other interested parties the opportunity to provide input on Trenton's primary housing and community development needs. Public hearings will be held in locations accessible to low- and moderate- income residents and people with disabilities. Translation for non-English speaking residents and/or those who are hearing impaired will be provided upon request. Public hearings will be advertised in accordance with the guidelines outlined in the Public Notice section above.

PUBLIC MEETINGS

Public meetings of the HED overseeing HUD programs provide opportunities for citizen participation and comment on a continuous basis. Meetings are held in locations accessible to persons with disabilities. Spanish translation and translation for individuals with hearing impairments are provided as necessary.

DOCUMENT ACCESS

Copies of all planning documents, including the Citizen Participation Plan, Consolidated Plan, Action Plan, and annual performance report, will be available to the public upon request. Citizens will have the opportunity to review and comment on these documents in draft form prior to final adoption by the City Council. These documents will be made available at City Hall in the Department of Housing and Economic Development and on the City's web page www.TrentonNJ.org. Upon request, these documents will be provided in a form accessible to persons with disabilities. Citizens, groups, and other interested

organizations may obtain copies of the written reports by calling HED at (609) 989-3521 or 7-1-1 (NJ Telecommunication relay Center).

TECHNICAL ASSISTANCE

The City can provide technical assistance upon request and to the extent resources are available to groups or individuals that need assistance in preparing funding proposals, provided that the level of technical assistance does not constitute a violation of federal or city rules or regulations. Technical assistance may be requested in writing by appropriate organizations, community-wide advisory groups, project area organizations, groups of low- and moderate-income persons and/or groups of residents of blighted neighborhoods. The provision of technical assistance does not involve re-assignment of City staff to the proposed project or group, or the use of City equipment, nor does technical assistance guarantee an award of funds. All requests should specify the name of the citizen groups or organizations as well as a contact person, the nature of technical assistance requested, immediate problems and the reason for the request.

REQUEST FOR PROPOSALS

At least annually, the City of Trenton will solicit proposals for funding that address identified community development and/or housing needs as identified in the Five-Year Consolidated Plan. The Request for Proposals will be announced on the City's website and advertised in the Trenton Times. Proposals for funds must be submitted on the form prescribed by the City. The schedule for submission will be provided concurrent with the announcement of the availability of the applications. No late submissions will be accepted.

IN THE EVENT OF AN EMERGENCY

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide an opportunity to comment where public comment is required to be heard. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the City's website.

In the event of an emergency, the following alternatives may be instituted by the City:

1. The public comment and display period for the Consolidated Plan and/or Annual Action Plan and any amendment thereto will be consistent with HUD's requirements.
2. Draft documents for public comment and review will be made available on the City's website at www.TrentonNJ.org
    a. Copies of the draft documents will be e-mailed upon request, if possible.
3. Public meetings may be held as virtual meetings using online platforms for public viewing with the option for real-time questions to be presented.

4. The City may opt to hold one public hearing during the Consolidated Plan/Annual Plan process and its second required public hearing during the CAPER process for the same program year if a virtual hearing is not feasible.

CITIZENS' COMPLAINTS

Written complaints may be directed to the City with regard to any HUD program or activity. A timely, written, and substantive response to the complainant will be prepared with 15 working days of receipt of the complaint by the appropriate department. If a response cannot be prepared within the 15-day period, the complainant will be notified of the approximate date a response will be provided. Written complaints must clearly state the complainant's name, address, and zip code. A daytime telephone number should also be included in the event further information or clarification is needed. Complaints should be addressed as follows:

For CDBG, ESG or HOME programs, correspondence should be addressed to:

Director
Department of Housing and Economic Development
City of Trenton
319 East State Street
Trenton, New Jersey 08608

If the response is not sufficient, an appeal may be directed to the Mayor, and a written response will be provided within 30 days. An appeal should be addressed as follows:

Office of the Mayor
City of Trenton
319 East State Street
Trenton, NJ 08608

Citizens wishing to object to HUD approval of the final Consolidated Plan may send objections to the HUD Field Office at One Newark Center, 13th Floor, Newark, NJ 07102-5260. Objections should be made within thirty (30) days after the City publishes notice in the *Trenton Times* that an application has been submitted to HUD.

CONTACT PERSON

All communication regarding the Consolidated Plan, the Annual Action Plan, the CAPER, the Analysis of Impediments to Fair Housing, comments, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Farrah Gee
Contract Administrator - Federal Block Grants
City of Trenton
Department of Housing and Economic Development
319 East State Street
Trenton, NJ 08608
Fgee@trentonnj.org
(609) 989-3516

CITY OF TRENTON RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

It is the policy of the City of Trenton to make all reasonable efforts to ensure that activities undertaken with CDBG and HOME Program funds will not cause unnecessary displacement or relocation. The City will continue to administer the CDBG and HOME Programs in such a manner that careful consideration is given during the planning phase to avoiding displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available and when the activity is determined necessary in order to carry out a specific goal or objective that is of benefit to the public.
If the displacement is precipitated by activities that require the acquisition (either in whole or in part) or rehabilitation of real property directly by the City of Trenton or an agent, all appropriate benefits as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments, or the Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) shall be provided to the displaced person or persons. These actions will adhere to the City's Residential Anti-Displacement and Relocation Assistance Plan.