



2022 Annual Action Plan

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM & HOME
INVESTMENT PARTNERSHIP
DEPARTMENT OF ECONOMIC DEVELOPMENT

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Executive Summary

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

1. Introduction

The 2022 Annual Action Plan (AAP) is the third annual action plan of the County of Gloucester's 2020-2024 Consolidated Plan, a five-year plan addressing the County's housing and community development needs. As an Entitlement Urban County, Gloucester County is awarded an annual allocation of federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds. To receive the allocation, known as Entitlement Funding, Gloucester County must submit an Annual Action Plan to the U.S. Department of Housing & Urban Development.

The purpose of each Annual Action Plan is to provide a summary of what the County proposes to do in the upcoming year to further the priorities and objectives of the Consolidated Plan. Activities funded from these programs must meet the priorities identified in the Consolidated Plan.

The funds are intended to provide low and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities.

Authorized under Title I of the Housing and Community Development Act of 1974 (HCDA), as amended, the **Community Development Block Grant (CDBG)** is an annual grant to localities and states to assist in the development of viable communities. This is achieved by providing the following, principally for persons of low- and moderate-income:

- Decent housing;
- A suitable living environment; and
- Expanded economic opportunities.

The **HOME Investment Partnerships (HOME) Program** was established under the National Affordable Housing Act of 1990 (NAHA), HOME is the largest Federal block grant available to communities to create affordable housing. The intent of the HOME Program is to:

- Increase the supply of decent, affordable housing to low- and very low-income households;
- Expand the capacity of nonprofit housing providers;
- Strengthen the ability of state and local governments to provide housing; and
- Leverage private sector participation.

Gloucester County is also responsible for the planning and administration of a specific allocation to one of Washington Township (Gloucester). Washington Township, as an Entitlement City, is awarded an annual allocation of CDBG funds.

Community Profile

Gloucester County is located in southwest New Jersey and covers approximately 328 square miles. Its strategic location along the Delaware River provides excellent access to most of the major markets in the northeastern United States. The County is very diverse with well-established urban industrial areas, growing suburban areas, productive agriculture, woodlands, wetlands and marshes and traditional small villages.

Most of the population is settled in the northern and eastern parts of the county in the Townships of Deptford, Washington, Monroe, West Deptford, and the communities of Woodbury, Pitman and Glassboro. Growth has continued to radiate out from the northwestern part of the county following major transportation corridors.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The County's 2020-2024 Consolidated Plan established the following Priority Needs:

- Preserve Existing Housing Stock
- Improve Public Facilities & Infrastructure
- Increase Homeownership
- Increase Access to Public Services
- Create New Affordable Housing
- Improve Homeless Services & Emergency Shelters
- Program Administration

To address these Priority Needs the County's Consolidated Plan set the following goals:

- Improve Housing Conditions
- Improve Public Facilities and Infrastructure
- Increase Homeownership
- Support and Expand Public Services
- Develop New Affordable Housing
- Create New Rental Housing Vouchers
- Support Emergency Shelters and Homeless Services
- Program Administration

The following is a summary of the proposed use of FY 2022 CDBG and HOME funds:

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year the County of Gloucester prepares a Consolidated Annual Performance and Evaluation Report (CAPER) to evaluate its effectiveness in addressing the Priority Needs and Goals of the Five Year Consolidated Plan and the prior year's Annual Action Plan. The 2020 CAPER (September 1, 2020 to August 31, 2021) was the first of the five-year period and reported the FY 2020 accomplishments of the City's CDBG and HOME Programs.

During FY 2020, Gloucester County received \$1,367,975, including \$117,227 for Washington Township's 2020 CDBG allocation and \$601,828 in HOME funds. The County expended a total of \$1,087,815 in CDBG funds and \$666,862 in HOME funds (which includes funds allocated in previous fiscal years) to carry out or complete activities proposed in both the current and prior fiscal years. Funds were spent on a variety of activities including: housing rehabilitation, first-time homebuyer programs, new housing construction, improvements to community facilities, the provision of public services, and administration.

In FY 2020, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. In FY 2020, 89.91% of CDBG expenditures benefitted low and moderate income persons.

In preparing this plan, the successful outcomes previously achieved suggested that some activities, such as housing rehabilitation, were efficient and effective uses of HUD funds and should be continued. Proficiency in completing infrastructure and facility projects and seeing both observed and documented benefits of public service efforts also suggested that inclusion of such activities, where warranted, would enhance opportunities for positively impacting our communities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

This Annual Action Plan has been developed pursuant to HUD requirements. Gloucester County's Department of Economic Development, Office of Housing & Community Development is responsible for preparation of this Annual Action Plan. This Plan resulted from a process of consultation, consensus building, and citizen participation and was built upon existing community outreach efforts. The Office of Housing & Community Development worked with public and non-profit organizations to ensure maximum opportunities for community participation in assessing needs and presenting strategies to meet the needs of low and moderate income persons and neighborhoods. Municipal representatives, citizens, not-for-profit organizations, and interested parties were afforded a variety of opportunities to participate in the process. The County complied with its Citizen Participation Plan and applicable HUD regulations regarding public participation and consultation.

As the lead agency for the Consolidated Planning Process, the Department of Economic Development, Office of Housing & Community Development solicited public participation during the development of the Plan. To notify the public of Public Hearings, notices were published in the legal section of The

Gloucester County Times and posted on the County's website www.gloucestercountynj.gov. In addition, notices were emailed directly to communities and non-profit organizations that have participated in previous consultations or applied for funding from the Programs.

A draft of the Plan was released for a 30-day public comment period beginning on June 6, 2022 and concluding on July 7, 2022 -- prior to approval by the County Board of Commissioners and its submission to the U.S. Department of Housing and Urban Development.

The County of Gloucester's Citizen Participation outreach was designed to encourage broad participation from the County's residents, including non-English speaking persons. Outreach to persons with disabilities was made through contact with the local agencies that represent the needs of persons with disabilities. Information about opportunities to comment on the Annual Allocation Plan was provided to local agencies.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

[To be written after the 30-day comment period]

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

[To be written after the 30-day comment period]

7. Summary

Through consultation with a wide array of stakeholders, Gloucester County has developed this Plan for the use of CDBG and HOME funds. The overarching purpose of the Plan is the efficient use of precious and limited resources to effectively address identified needs among the County's most vulnerable residents. The Plan is built on the County's proven methods of meeting needs but with a recognition that needs and the forces that drive them are subject to change. Housing, public buildings and systems, and public services that inform, educate or otherwise elevate the quality of life continues to be the focus of Gloucester County's efforts in this arena.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	GLOUCESTER COUNTY	
CDBG Administrator	GLOUCESTER COUNTY	Department of Economic Development
HOME Administrator	GLOUCESTER COUNTY	Department of Economic Development

Table 1 – Responsible Agencies

Narrative (optional)

In 2021, the Office of Community Development and Housing was moved from the Department of Planning to the Department of Economic Development within the County government. The office physically moved to Tanyard Lane in Deptford, NJ.

Consolidated Plan Public Contact Information

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The County of Gloucester, has prepared this Annual Action Plan in order to strategically implement federal programs that fund housing, community development, and economic development activities within the County. Through a collaborative planning process that involved a broad range of public and private agencies, the City has developed a single, consolidated planning and application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Programs.

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))

During the preparation of 2020-24 Consolidated Plan, the County convened several focus groups to inform the Plan. Two focus groups in particular addressed the topic of enhancing coordination between public and assisted housing providers and private and government health, mental health and service agencies:

Special Needs of Non-Homeless Group

1. Organizations that provide housing and support services to special needs populations, including: elderly persons, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or other drug addiction and homeless persons
2. Organizations that serve persons leaving mental/physical health facilities

Affordable Housing Focus Group

1. Public Housing Agencies
2. Affordable Housing Developers, both non-profit and for-profit
3. Non-profit service provider to residents of affordable housing developments
4. Regional Continuum of Care

While the primary purpose of the focus groups was to assess needs in preparation of the Consolidated Plan, the groups also provided an opportunity for networking and coordination among public and assisted housing providers and governmental health, mental health and 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 Office of Housing & Community Development is an active participant in meetings and planning efforts undertaken by the Continuum of Care. The CoC's priority needs and goals have been incorporated directly into the County's 2020-24 Consolidated Plan. As a result, there are several proposed projects in this Annual Action Plan that will be awarded to members of the CoC to directly address the needs of homeless persons and those at-risk of homelessness.

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

The County of Gloucester does not receive ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Gloucester County Housing Authority
	Agency/Group/Organization Type	PHA Other government - County
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County enjoys regular and open communication with the Gloucester County Housing Authority. GCHA remains a strong partner in the planning and implementation of the CDBG and HOME programs. Throughout the year, the County is collecting feedback and needs from the GCHA during their numerous calls and meetings.
2	Agency/Group/Organization	Gloucester County Dept. of Economic Development
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Economic Development

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The County's CDBG and HOME programs now fall under the County's Department of Economic Development. Through staff meetings and regular communication with the programs' administrator, the Department is regularly informing the planning and implementation efforts of the CDBG and HOME programs. The Department has been particularly helpful in developing emergency assistance programs for microenterprises and small businesses in 2021.</p>

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

The County does not exclude any agencies from consultation or participation in the planning of the CDBG and HOME programs.

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	Camden/Gloucester/Cumberland Continuum of Care	The goals of the Strategic Plan are closely coordinated with the goals of the Continuum of Care. The Division of Planning is an active participant with the applicant and administering agency for the Continuum of Care, in addition to the County's CDBG, and HOME allocations.
Analysis of Impediments to Fair Housing Choice	Gloucester County	The Office of Housing & Community Development was actively involved in the development and update of the County's AI in 2020. Actions to address impediments identified in the AI are incorporated in the Action Plan and CAPERS.
Comprehensive Economic Development Strategy	Gloucester County	The goals of the Strategic Plan are closely coordinated with the goals of the CEDS Plan which identifies, prioritizes and coordinates local economic development projects.
Endings Have Beginnings	Endings Have Beginnings Homeless Network Planning Committee	The goals of the Strategic Plan are closely coordinated with the goals of the Endings Have Beginnings Plan which plans for a 10-year goal of ending homelessness.
10-yearter County Housing Authority	Gloucester County Housing Authority	The Goals of the Housing Authority's Five-Year Plan are closely coordinated with the goals of providing affordable housing for the County

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

The County of Gloucester's Citizen Participation outreach was designed to encourage broad participation from the County's residents, including non-English speaking persons. Outreach to persons with disabilities was made through contact with the local agencies that represent the needs of persons with disabilities. Information about opportunities to comment on the Annual Action Plan was provided to local agencies.

This Annual Action Plan is a result of a process of consultation and citizen participation, building upon existing relationships with municipalities, state agencies, county departments, and local non-profit organizations. Municipal officials and administrators, citizens, non-profit organizations, and interested parties were afforded a variety of opportunities to:

- 1) Contribute during public meetings and planning sessions;
- 2) Review and comment upon the participation plan itself;
- 3) Receive information about the meetings, the plan and comments made about the plan;
- 4) Comment on the 2022 Annual Action Plan;
- 5) Register complaints about the plan and its amendments.

Gloucester County complied with the citizen participation requirements of the regulations by doing the following:

- Preparing, adopting and following a Citizen Participation Plan;
- Publishing informational notices about the plan prior to public hearings;
- Holding two or more public meetings in accessible places at convenient times after providing reasonable notice;
- Posting a copy of the draft and final Annual Action Plan on the county website;
- Making the Annual Action Plan available for public examination and comment for a period of thirty (30) days before submission to HUD
- Providing citizens, public agencies, and other interested parties reasonable access to records regarding any uses of any assistance for affordable and supportive housing; and
- Considering the views and comments of citizens, and preparing a summary of those views for consideration with the Annual Action Plan submission.

Four (4) virtual public hearings were scheduled (two afternoon and two evening) using online meeting software. The meetings were convenient to the general public and accessible to individuals with disabilities and special needs. To notify the public of the hearings, public notices were published in the Gloucester County Times and posted on the County website www.gloucestercountynj.com.

A draft of the Annual Action Plan was released for public comment on June 6, 2022. A summary of the Plan was published in the Gloucester County Times.

Comments received from the public regarding the Consolidated Plan and Annual Action Plan were recorded and made part of the public hearing records. Comments are included as an Appendix to this Plan. These comments helped identify and prioritize needs and develop strategies to meet them.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Meeting	Non-targeted/ broad community	The County held two virtual public hearings on April 26, 2022 to solicit input on educating this Plan -- one at 2PM and another at 4PM. Attendance was strong overall with many representatives from local governments participating. The public notice, slides and attendance records are appended to this Plan.	All comments were supportive of the County's efforts to distribute the funding to local towns and nonprofit organizations.	All comments were accepted.
2	Public Meeting	Non-targeted/ broad community	The County held two virtual public hearings on June 16, 2022 to solicit comments and feedback on the draft Plan -- one at 2PM and another at 4PM. [Add summary after hearing]		
3	Website	Non-targeted/ broad community	The County publishes all documents related to the CDBG and HOME program on its website, including a Draft of this plan which was published on June 30, 2021. Links to virtual meetings can be found there as well. https://www.gloucestercountynj.gov/569/Housing-Community-Development	N/A	N/A

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The County has been allocated \$1,378,973 in CDBG funds for 2022 and \$594,263 in HOME funds. The County also administers the CDBG program for Washington Township, which has an allocation of \$116,845 for 2022. That amount is included in the anticipated amount below. Estimates for the remaining 3 years of the Consolidated Plan period are based on an approximation of funding levels remaining unchanged.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,352,452	0	0	1,352,452	2,704,904	2022 Community Development Block Grant Entitlement funds.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	637,223	0	0	637,223	1,274,446	2022 Home Investment Partnership Funds

Table 5 - Expected Resources – Priority Table

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

The federal 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 include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning and administration. The County will partner with municipalities, other public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development. Virtually all planned activities have some degree of leveraging from non-federal sources. The source of these funds ranges from bake sales for a small non-profit to developer equity of thousands of dollars.

Gloucester County will continue to leverage funds from the state and regional sources, effectively multiplying the impact of CDBG and HOME funds. The Match for the HOME Program will be met through a combination of cash from nonfederal sources, including developers equity, sweat equity, land donated by municipalities and private bank investment in housing projects.

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

Though no specific municipalities or parcels can be identified at this point, it is anticipated that the past practice of having land donated to organizations such as Habitat for Humanity for the construction of affordable housing will continue at some point during the five years covered by this Consolidated Plan.

Discussion

DRAFT

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Housing Conditions	2020	2024	Affordable Housing	Countywide	Preserve Existing Housing Stock	CDBG: \$337,976 HOME: \$186,837	Homeowner Housing Rehabilitated: 17 Household Housing Unit
2	Improve Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Countywide	Improve Public Facilities & Infrastructure	CDBG: \$565,202	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
3	Increase Homeownership	2020	2024	Affordable Housing	Countywide	Increase Homeownership	HOME: \$50,000	Direct Financial Assistance to Homebuyers: 8 Households Assisted
4	Support and Expand Public Services	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Increase Access to Public Services	CDBG: \$200,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
5	Develop New Affordable Housing	2020	2024	Affordable Housing	Countywide	Create New Affordable Housing	HOME: \$190,000	Homeowner Housing Added: 3 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Create New Rental Housing Vouchers	2020	2024	Affordable Housing	Countywide	Create New Affordable Housing	HOME: \$108,000	Tenant-based rental assistance / Rapid Rehousing: 9 Households Assisted
8	Program Administration	2020	2024	Administration	Countywide	Program Administration	CDBG: \$275,795 HOME: \$59,426	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve Housing Conditions
	Goal Description	
2	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	
3	Goal Name	Increase Homeownership
	Goal Description	
4	Goal Name	Support and Expand Public Services
	Goal Description	
5	Goal Name	Develop New Affordable Housing
	Goal Description	
6	Goal Name	Create New Rental Housing Vouchers
	Goal Description	
8	Goal Name	Program Administration
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

With input from a variety of stakeholders, with data from a variety of sources and with hands-on experience in front-line services to the most vulnerable populations in the County, Gloucester County plans a mix of activities in FY 2022 to address a wide range of challenges for those populations. Infrastructure improvements, housing rehab, community facilities and social services are just some of the approaches to improving neighborhoods, houses and, most importantly, families in Gloucester County.

SUMMARY OF FY2022 ANNUAL ACTION PLAN

Community Development Block Grant Program:	\$1,352,452
Administration	\$270,490
Public Services	\$200,000
Municipal Projects	\$513,600
Housing Rehabilitation	\$241,869
Project Delivery	\$126,493
Anticipated Program Income	\$120,000
HOME Investment Partnerships Program:	\$637,223
Administration	\$63,722
Homebuyer Assistance	\$50,000
Housing Rehabilitation	\$215,501
Tenant-Based Rental Assistance	\$108,000
Affordable Housing Development	\$ 200,000

Public Services projects include the following awards of Program Year 2022 CDBG funds:

Center for Family Services, Inc.: Together Youth Shelter - Get Fit!	\$30,000
Center for Family Services, Inc.: YES Shelter - Wellness Program	\$30,000
FOOD BANK OF SOUTH JERSY	\$50,000
Gateway Community Action Partnership - Headstart	\$41,500
First Baptist Church of Jericho	\$48,500

Municipal Projects include the following awards of Program Year 2022 CDBG funds:

Municipality	Project Name	Amount Requested
Borough of Clayton	Reconstruction of W. Clinton Street - From Delsea Drive to Broad Street	\$ 50,000.00
Borough of Clayton	Reconstruction of North New Street - Borough of Clayton	\$ 50,000.00
Borough of Glassboro	Church Street Reconstruction	\$ 49,908.00
Borough of Glassboro	Laurel Avenue Reconstruction	\$ 49,776.00
Borough of Pitman	ADA Improvements-Handicap Ramp/Sidewalk Installation	\$ 50,000.00
Borough of Swedesboro	ADA Improvements to Various Streets	\$ 50,000.00
Borough of Woodbury Heights	Vanderbilt Avenue and Fordham Road Intersection Modifications	\$ 27,910.00
Borough of Woodbury Heights	Clemson Road & Vanderbilt Avenue / Hamilton Road & Vanderbilt Avenue	\$ 42,960.00
Elk Township	Elk Township Recreation Park Tennis & Pickleball Courts Reconstruction	\$ 50,000.00
Monroe Township	Construction of Sidewalks and ADA Curb Ramps at Various Locations	\$ 50,000.00
Township of Deptford	Reconstruction of Mullray Court	\$ 50,000.00
West Deptford	Resurfacing of Brewer Ave from Warren Ave to Frontage Ave	\$ 50,000.00

Table 7 - Project Information

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

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

The focus of the efforts as set forth in this Annual Action Plan, are to provide safe, decent and affordable housing and a positive community environment that offers good quality of life and economic opportunities to all residents. The County is not allocating funds geographically. Allocation of funds at the County level are budgeted for County wide activities, including housing rehabilitation, first time home buyers, tenant based rental assistance, etc. Funds for municipal projects and public service programs were allocated based on evaluations through a Request for Proposal process.

Geographic Distribution

Target Area	Percentage of Funds
Countywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Maps showing the percentage of Low/Mod Income households by Census Block Group were distributed to each municipality. The maps indicate the percentage of low/mod households in each block group, highlighting the HUD Eligibility Areas. HUD regulations allow the County to select areas that comprise the lowest quartile of income in the County as eligible for assistance under the Low- and Moderate income designation. Areas within the Gloucester Quartile figure of 42.50% are located Boroughs of Clayton, Glassboro, National Park, Paulsboro, Pitman, Westville and Woodbury Heights; the Townships of Deptford, Elk, Franklin, Logan, Mantua, Monroe, Washington, West Deptford; and the City of Woodbury. All activities proposed for CDBG funding are within the County's Low- and Moderate income quartile of block groups or are specific to low- and moderate income clientele.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Affordable Housing activities in FY2021 include: rehabilitation of owner-occupied homes, financial assistance for first time homebuyers, development subsidies for the construction of new for sale and rental housing, and homelessness prevention.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	29
Special-Needs	0
Total	29

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	9
The Production of New Units	3
Rehab of Existing Units	17
Acquisition of Existing Units	0
Total	29

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

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

There are two Public Housing Authorities in Gloucester County. The Glassboro Housing Authority serves that community while the Housing Authority of Gloucester County serves the rest of the County. Together the Authorities operate 442 units of public housing, 320 of them for the elderly. Overall, units operated by both Housing Authorities are in fair condition and in need of minor rehab. All Public Housing developments have occupancy rates in excess of 90% with most developments at 98-100 % occupied. Most developments have annual turnover rates of 5% or less. In addition to operating Public Housing developments, both Housing Authorities also operate voucher programs. There are a total of 1,903 Housing Choice Vouchers managed by the two housing authorities. Extensive waiting lists exist for both housing authority units and rental vouchers.

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

The County will augment the Public Housing voucher programs by providing \$108,000 in HOME funds for a Tenant Based Rental Assistance program.

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

Continued operation of resident councils at Public Housing developments. Additionally, the Housing Authority of Gloucester County requires each non-exempt adult public housing resident to contribute a minimum of 8 hours of community service per month or participate in an economic self-sufficiency program for a least 8 hours per month. Residents will be referred to the Gloucester County Volunteer Center, which acts as a clearinghouse for residents to offer their time or services to organizations in need of volunteers. The Authority shall consider activities that are designed to encourage, train or facilitate economic independence as valid activities.

The Glassboro Housing Authority identifies the promotion of resident participation in its annual goals. The Authority recognizes the need for “Effective Resident Organization Partnerships”: Develop residents’ organizations on sites. Support and promote effective partnerships with resident organizations to insure proactive support for building, managing and maintaining sound, safe, affordable communities. The indicated “Performance Measure” is that resident councils will meet on a regular basis and consistently work with the Glassboro HA regarding problem identification and pursuing positive approaches to addressing community issues; the extent to which the vast majority of resident adults, their children and guests are in compliance with the terms and conditions of the lease provisions, especially related to drug-related criminal and/or violent behavior, which disrupts the peaceful enjoyment of the premises by the other residents.

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

Neither Housing Authority is designated as troubled.

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

Introduction

The County's strategy for implementing its homelessness program focuses on the prevention of homelessness and the provision of emergency services for homeless persons and families. The strategy for eliminating chronic homelessness flows from the priorities described in the Consolidated Plan. The institutions and structure to properly address this issue are in place and are described in the homeless inventory section of the Plan. As noted earlier in establishing our priorities, the prevention of homelessness is a key element in our efforts. By providing rehabilitation assistance and referral services for low-income households the County aims to prevent the conditions that would precipitate homelessness. The County plans to employ the resources of the CDBG program, the HOME program, the Workforce Investment Board, the municipal housing authorities, the County Board of Social Services, and a number of not-for-profit service providers to achieve our goals.

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

Through fiscal and technical support for the front-line organizations that conduct this important work, Gloucester County will continue to reach out to the homeless, especially unsheltered homeless. The County's Point in Time Survey is one method area providers use to connect with the homeless and try to bring them into the regional support network to transition from homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through fiscal and technical support for shelter and transitional housing providers and by offering networking opportunities for them.

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

Expanding housing options for low income residents will shorten the period of homelessness. Gloucester County's plans in this area include support for the creation of additional affordable units and support for rent assistance through the Tenant Based Rental Assistance program.

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 County's housing rehab program will help low-income homeowners avoid homelessness by providing repairs that will allow them to remain in their homes. Funds are also being provided for direct homeless prevention. The County's many social service providers also connect their own clients with other needed services, including job training, housing assistance, information on employment and child care and much more.

Discussion

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

Introduction:

The national goal of decent, safe and sanitary housing for every American is the basis of the National Affordable Housing Act. Despite the great demand for more affordable housing, its supply has remained limited. Many developers and builders have cited government regulation as factors affecting production costs. In addition, some public policies inadvertently have made certain types of residential development less desirable, therefore, less profitable. Although public policies and governmental regulations are essential to ensure the public's health, safety and welfare, they also can limit market production efficiencies. Described below are a few that may be limiting the supply of affordable housing in Gloucester County. The programs, regulations and conditions discussed below affect land and housing cost. Some of these policies have their origin in a higher governmental authority than Gloucester County.

The most important impediment revolves around the lack of Federal and State resources for affordable housing initiatives.

Gloucester County and its municipalities do not put any limitations on growth. Through vehicles such as zoning ordinances, subdivision controls, permit systems, housing codes and standards new construction restrictions and rent control, Gloucester County has attempted to minimize the barriers that may impede the development of affordable housing.

The Affordable Housing Dilemma

As a largely suburban community in the greater Philadelphia area, Gloucester County continues to have relatively high housing costs. The Median Value of owner occupied housing in Gloucester County is \$216,700, according to the 2014-2018 American Community Survey. The current housing prices are well beyond "affordable" to many County residents. Housing in Gloucester County is, on the average, more expensive than Counties to the south in more rural areas, but more affordable than the counties north which are closer to Philadelphia, Trenton and North Jersey. Historically, the general rule for housing affordability has been a household spending 2.5 to 3 times their annual income on a home purchase and no more than 30% of a household's monthly income for shelter costs, including mortgage and taxes or rent, utilities and other housing expenses. The median household income (MHI) in Gloucester County according to the 2014-2018 American Community Survey is \$103,259.

Affordable housing takes many forms, including age-restricted and accessible housing to allow seniors to age in place, and housing built through inclusionary zoning or density bonus ordinances, units that can be mandated to be kept affordable for years or forever. It could also be small homes on smaller lots "built without the bells and whistles." This housing can be rental or ownership. Older housing in need of rehabilitation would also be considered affordable except that lower income home buyers have no liquid assets to make needed repairs upon purchase, even if they have adequate credit.

The recent policy of some funding sources to limit criminal background checks has presented a problem for some developers attempting to gain approvals for affordable housing projects. The practice limits a developer's ability to assure potential opponents that a project won't be a detriment to their community.

There are also some instances where push-back from NIMBY groups or elected officials can deter affordable housing development.

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

While it is beyond the ability of the County or any of its municipalities to control market forces and other factors, there are some steps that can be taken. The County will:

- Through the use of HOME funding, continue to assist affordable housing development. The County will also continue to provide technical assistance to non-profit organizations seeking state and federal funds for affordable housing development both rental and homeownership.
- Continue the homebuyers program to help families afford home ownership.
- Work with municipalities to assess zoning, design guidelines and local government standards to ensure that these elements of the construction process do not hinder the creation of affordable housing.
- Review building fee ordinances if requested by municipalities and recommend modifications as necessary; investigate possibility of non-profit organizations having fees waived.
- Continue to seek supplementary funding and opportunities to leverage limited resources.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Whether fostering partnerships among Gloucester County's various agencies and organizations or looking to continue to develop the County's own staff or keeping on top of the latest tools to combat lead-based paint poisoning and the cycle of poverty, the County's Department of Public Works, Division on Planning will continue going beyond minimum requirements and basic expectations for one simple reason – so many of our County's most vulnerable residents deserve no less.

Actions planned to address obstacles to meeting underserved needs

Continued vigilance for opportunities to link, leverage and otherwise expand resources for the County and its many partners.

Actions planned to foster and maintain affordable housing

The County is funding several activities that foster and maintain affordable housing: Owner-occupied rehabilitation, Tenant Based Rental Assistance and construction of new homebuyer units.

Actions planned to reduce lead-based paint hazards

Lead hazards are addressed during housing rehabilitation efforts. All homes that receive rehabilitation assistance are tested for the presence of lead-based paint. When evidence of paint is found, surfaces are removed or the material is encapsulated to prevent exposure. In the homebuyers program, when defective painted surfaces are found, the surface must be tested for lead-based paint as well and treated by a qualified trained contractor.

The County's Lead-Based Hazard reduction strategy, administered by the Department of Health, involves the administration of the Lead Intervention for Children at Risk Program (LICAR) which supports the abatement or reduction of lead-based paint hazards in low-income housing.

The Department of Health provides administrative and program delivery staff responsible for marketing the LICAR program; conducting application intake, review, and approval; completing environmental reviews; completing housing inspections and when funding is available preparing work write-ups and cost estimates for lead hazard control work; preparing contractor bid packages and supervising advertisement for bids and selection of contractors; managing temporary resident relocation while lead hazard control work is being completed and monitoring work in progress through to completion.

Lead-based paint poses a particular hazard to children under the age of six, and is the focus of efforts by HUD to raise awareness of the problem and mitigate or eliminate the hazard.

Actions planned to reduce the number of poverty-level families

The County's anti-poverty strategy is linked to the Economic Development Programs that have been implemented and operated for more than a decade. The objective of poverty reduction requires programming for job readiness areas, including job training and placement, supportive public services,

education and basic skills development. The overriding principle however is to create new jobs and opportunities for households with incomes below the poverty level. It is only through comprehensive, coordinated strategies that nurture skills and provide opportunities to gain and retain employment and thus improve the quality of life, that people can improve their situation.

Numerous programs currently exist in the County to help address the problems of poverty. These include:

- Board of Social Services programs that provide single mothers with children the opportunity to receive welfare benefits, such as TANF, in coordination with job training.
- Programs administered by the Dept. of Economic Development, such as the federal Workforce Investment Act program, offer job training, job search assistance and job placement services to low income households. All persons receiving welfare assistance from the Board of Social Services are referred to the Department of Economic Development, WIA Division, for job training and employment services.
- Within the Department of Public Works, the Division of Planning and the Division of WIA work closely together to create job opportunities through economic development projects and initiatives carried out under the CDBG Program.
- The Boards of Education throughout the county offer help obtaining high school diplomas or the GED certificate. The County facilitates and supports programs to coordinate training programs provided by public institutions with the needs of employers.
- The Vo-tech school, the community college and Continuing Education Programs provide training and educational opportunities.
- Day care funding throughout the County
- Long-term employment opportunities for severely disabled adults, and
- Life skills development programs.

All projects to be funded with CDBG funding are encouraged to follow the language of Section 3 requirements to recruit needed employees from very low income neighborhoods and where possible from the pool of WIA Program graduates. This coordinated effort will create additional employment opportunities for low-income residents. All economic development activities/projects that create jobs will also be coordinated with the WIA and the FDP Programs. Only viable employment opportunities can assist low-income households achieve financial self-sufficiency, which is important in alleviating the problems of poverty and its vicious cycle.

Employment programs reach only a part of the poverty population. Many of the people living in poverty are not employable and thus the County works cooperatively with numerous public, social, and civic service organizations to develop and implement direct assistance and service delivery programs to improve the quality of life of these persons. The first step of providing health and social services is necessary to enable an unemployed person to become employable.

The County has been providing financial assistance through direct grants as well as technical and advisory assistance to non-profits and community agencies that administer a wide variety of programs for lower income residents. These programs have an immediate impact on primary needs of the low-income population and the causes of poverty. CDBG provides the core funding for critical basic needs including youth and senior services and housing.

Actions planned to develop institutional structure

Continued participation in regional and state networking and information opportunities. Also continued familiarity with the service providers in Gloucester County and in neighboring and nearby counties.

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

As a common partner with so many of the public and private housing and social service providers, the Gloucester County Department of Economic Development has been a natural conduit for communication and interaction among these entities. The CD Program will continue to serve in that capacity while respecting the autonomy and uniqueness of each partner.

Discussion:

Program Specific Requirements

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

Introduction:

Gloucester County has identified all CDBG and HOME activities to be undertaken in FY2021 in the Projects Table, including administrative, project delivery, public services, reconstruction of public facilities and infrastructure, rental assistance facilities and service providers and affordable housing, both rehabilitation and new construction.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

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

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

Gloucester County will not provide forms of assistance that are inconsistent with 24CFR 92.205 as detailed in 92.205(b) Forms of assistance (1) and (2).

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

Gloucester County uses HOME funds for two types of homebuyer activities. They are:

1. Homebuyer purchase assistance, which provides loans to help with down payments and closing costs, and
2. Direct buyer subsidy for houses constructed or rehabbed, in whole or in part, with HOME funds, generally built or rehabbed by the County's non-profit partners, both CHDO and non-CHDO alike.

Gloucester County has chosen to use the Recapture option for all programs. The HOME program's investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to the County should the property be sold during the period of affordability.

Repayments are in the amount of the direct subsidy, subject to availability of net proceeds. For the homebuyer down payment assistance program, all HOME funds are considered the direct subsidy. In the construction/rehab sale properties, the direct subsidy is the amount of HOME funds used to reduce or help reduce the sales price from market value to an amount affordable to the buyer.

In the event that net proceeds – defined as sales price less other debt on the property – is insufficient to repay the entire direct subsidy, the recaptured amount shall be determined by the following formula: HOME direct subsidy/Total project cost x net proceeds = Recapture amount.

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

The HOME program's investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to Gloucester County should the property be sold during the period of affordability.

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:

Not applicable - Gloucester County does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitate with HOME funds.