

# 2025-2029 Consolidated Plan and 2025 Annual Action Plan

---

TOWNSHIP OF HAMILTON, NEW JERSEY

**Teregjona Acosta**

DIRECTOR OF NEIGHBORHOOD PRESERVATION, TOWNSHIP OF HAMILTON, DEPARTMENT OF  
COMMUNITY & ECONOMIC DEVELOPMENT | 2090 GREENWOOD AVENUE HAMILTON, NJ  
08609

# Contents

Executive Summary.....	3
ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b) .....	3
The Process .....	6
PR-05 Lead & Responsible Agencies - 91.200(b) .....	6
PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l).....	7
PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c) .....	10
Needs Assessment .....	11
NA-05 Overview .....	11
NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f) .....	13
Housing Market Analysis.....	15
MA-05 Overview .....	15
MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f) .....	20
MA-50 Needs and Market Analysis Discussion .....	26
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2).....	30
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3) .....	33
Strategic Plan .....	35
SP-05 Overview .....	35
SP-10 Geographic Priorities - 91.415, 91.215(a)(1) .....	36
SP-25 Priority Needs - 91.415, 91.215(a)(2).....	38
SP-65 Lead-based Paint Hazards - 91.415, 91.215(i) .....	51
SP-70 Anti-Poverty Strategy - 91.415, 91.215(j) .....	53
SP-80 Monitoring - 91.230 .....	55
Expected Resources .....	56
AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2) .....	56
Annual Goals and Objectives .....	59

AP-35 Projects - 91.420, 91.220(d) ..... 62

AP-38 Project Summary ..... 63

AP-50 Geographic Distribution - 91.420, 91.220(f) ..... 67

AP-85 Other Actions - 91.420, 91.220(k) ..... 68

Program Specific Requirements..... 70

# Executive Summary

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

### 1. Introduction

The purpose of a Consolidated Plan is to identify housing and community development needs and to develop specific goals and objectives to address those needs over a five-year period. This Five-Year Consolidated Plan for the Township of Hamilton, Mercer County, covers the period July 1, 2025, to June 30, 2029. The Township of Hamilton will receive an annual share of federal CDBG funds and is a participant in the HOME Consortium administered by Mercer County. The Consolidated Plan allows the Township to continue to receive federal housing and community development funds as a direct Entitlement from the U.S. Department of Housing and Urban Development (HUD).

To continue to receive these funds for Fiscal 2025, the Township of Hamilton must submit its Five-Year Consolidated Plan and FY 2025 Annual Action Plan to HUD by August 15, 2025. The 2025-2029 Consolidated Plan has been prepared by the Township Department of Community Planning and Compliance and its consultant, Triad Associates, to meet application requirements for the following grants and programs:

- Community Development Block Grant Program (CDBG)

The Township works with a significant number of non-profit housing and community development organizations through a public driven, citizen participation process to provide a diversity of community development programs and related services to the Township's low and moderate income persons and families.

The FY 2025-29 Consolidated Plan and 2025 Annual Action Plan describe to HUD how the Township of Hamilton intends to use federal and non-federal resources to address the needs of very low-, low- and moderate-income persons and families based on the following goals:

- Provide Decent Housing,
- Provide a Suitable Living Environment,
- Expand Economic Development Opportunities

The housing and community development activities described in the Consolidated Plan include: homeownership and housing preservation activities; public services provided to community members; the upgrading of public facilities; housing and services to homeless people and others with affordable housing and supportive service needs.

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

All activities funded in the next five years will support at least one objective and one outcome:

- Preserve existing housing through the Housing Rehabilitation Program
- Maintain and improve the infrastructure including water, sewer, streets, sidewalks, storm water facilities
- Maintain and improve public facilities including parks and recreation facilities; make handicap accessibility improvements as needed
- Ensure that quality public services in support of youth development, public health, employment and housing needs are available to low-income residents
- Continuing Administration and Management of the CDBG program.

### **3. Evaluation of past performance**

The Township of Hamilton prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY 2023 (July 1, 2023 to June 30, 2024). This CAPER was the fourth of the prior five-year period and reported the FY 2023 accomplishments of the Township’s CDBG Program.

During FY 2023, the Township received \$618,997 in CDBG funds. The Township expended a total of \$1,029,444, which includes program income plus some funds allocated in previous years. All funds spent during the 2023 Program Year addressed high priority needs identified in the 2020-2024 Consolidated Plan, specifically the needs for housing preservation, public services and infrastructure/facility improvements. During the 2023 Program Year, many projects that focus on low- and moderate-income areas, such as road repairs, were implemented that had been delayed in prior years.

### **4. Summary of citizen participation process and consultation process**

The Township conducted two public hearings and two focus group sessions to solicit input in the preparation of the Consolidated Plan and Action Plan. The meetings were advertised in the Trentonian newspaper. The citizen participation process and consultation process is as follows:

- Public Hearing 1: January 28, 2025 at 2:30PM in the Council Chambers Room and virtually via Zoom.
- Focus Group 1: January 28, 2025 at 1:30PM virtually via Zoom.
- Focus Group 2: January 29, 2025 at 2PM in-house with Township staff.
- Public Hearing 2: June 18, 2025 at 2PM in the Council Chambers Room
- 30-Day Public Review Period: (June 4, 2025 through July 5, 2025) On June 4, 2025 the Township advertised that copies of the draft FY 2025-2029 Consolidated Plan and FY 2025 Action Plan were available to the public for review and comment at <https://www.Hamilton.nj.com/> and in-person at the Department of Community and Economic Development office for 30 days starting June 4, 2025.
- The Hamilton Township Council approved the 2025-2029 Consolidated Plan and FY 2025 Action Plan at their July 2025 Council meeting for submission to HUD.

### **5. Summary of public comments**

A copy of attendance and minutes for all focus groups and public hearings is included in the Citizen Participation attachment.

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

All comments were accepted.

**7. Summary**

The Township of Hamilton sought to prepare a 2025-2029 Consolidated Plan that will guide progress in addressing the needs of the community by providing decent housing, a suitable living environment and expanded economic opportunities principally for low and moderate-income persons. The plan is based on needs as identified by data and by conversations with community stakeholders. It proposes realistic actions based on the resources expected to be available to address those needs.

The Township's Citizen Participation outreach was designed to encourage broad participation from residents, including non-English speaking persons. An approved Citizen Participation Plan was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public and data provided by HUD was used to identify goals and the activities of this Consolidated Plan.

# The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	HAMILTON TOWNSHIP (MERCER COUNTY)	Dept. of Community Planning & Compliance

**Table 1– Responsible Agencies**

### Narrative

The Department of Community Planning and Compliance of the Township of Hamilton is the designated Lead Agency for the preparation, submission, execution, and monitoring of this 2025-2029 Consolidated Plan, covering the period July 1, 2025 to June 30, 2029, and the 2025 Annual Action Plan, which covers the period July 1, 2025 to June 30, 2026.

The Township Council, through the Department of Community Planning, has the ultimate responsibility in assuring that the priority needs of the Consolidated Plan are met. The Department provides the funding and technical assistance to the non-profit housing developers and service providers, and Township agencies and authorities for projects that meet the needs documented in the plan. The Township’s housing and community development programs are administered by the Department of Planning, working with a number of other Township agencies, county offices, and not-for-profit service providers.

### Consolidated Plan Public Contact Information

Teregjona Acosta  
 Director of Neighborhood Preservation  
 Township of Hamilton  
 Department of Community & Economic Development  
 2090 Greenwood Avenue  
 Hamilton, NJ 08609  
 Phone (609) 890-3675  
 Email: [tacosta@hamiltonnj.com](mailto:tacosta@hamiltonnj.com)

## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

The Township of Hamilton prepared a Five-Year Consolidated Plan for the Years 2025 through 2029 in order to strategically implement federal programs that fund housing, community development and economic development activities in the Township. Through a collaborative planning process that involved a broad range of public and private agencies, the Township developed a single, consolidated planning and application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG) Program. The Township receives HOME funding as part of the Mercer County HOME Consortium and planning for the use of both CDBG and HOME funds was done in consultation with Mercer County's Community Development Program, lead entity for the HOME Consortium. The Township of Hamilton will submit this 2025-2029 Consolidated and 2025 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD) on or before August 15, 2025.

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

In preparing this Consolidated Plan, the Township held discussions with the public, housing providers, and health, mental health and service agencies. The Township provided input and suggestions to each group and individual organizations within each group on ways to enhance coordination of their efforts.

Various Township agencies, non-profit organizations, and service providers engaged in a consultation process to develop and implement the Plan. The Department of Planning staff engaged Township staff in this process to better assess the Township needs.

#### **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**

Mercer County's Continuum of Care (CoC) Lead Organization is the County's Division of Homelessness. The Housing Choice Voucher Program and the Continuum of Care prepare multi-year plans that identify the needs, goals and objectives for the planning period. These agencies will continue to evaluate the services needed. Though these entities work well together, there are opportunities for improved coordination and communication. All agencies involved in these efforts are seeking new ways to better serve their target populations and the general public.

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

Each year, a Point-in-Time count is made of the persons residing in shelter and transitional facilities and living unsheltered in Mercer County.

The Township of Hamilton is part of the Mercer County HUD Continuum of Care (CoC). The Continuum of Care process is a collaboration of agencies seeking funding through the McKinney-Vento Act; a program that includes services such as Supportive Housing Programs, Shelter+Care Vouchers, etc.

With the assistance from the Continuum of Care process, the facilities and services and ESG allocations specific to the Township of Hamilton have been identified. The facilities include Emergency Shelters, Transitional Housing and Permanent Supportive Housing. Services include prevention activities, outreach and emergency supportive services.

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

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by	How was the Agency/Group/Organization consulted and what are the anticipated outcomes
<TYPE=[pivot_table] REPORT_GUID=[AA4FDEC5439905E0BA7EBD82142E56F5]>			

**Table 2– Agencies, groups, organizations who participated**

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

Not applicable.

**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?

**Table 3– Other local / regional / federal planning efforts**

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

Hamilton Township is located in Mercer County, a HOME Consortium grantee. The Township and County coordinate planning for the use of Township CDBG funds and County HOME funds to avoid redundancy and promote mutually supportive efforts.

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

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

The Township conducted two public hearings and two focus group sessions to solicit input in the preparation of the Consolidated Plan and Action Plan. The meetings were advertised in the Trentonian newspaper. The citizen participation process and consultation process is as follows:

- Public Hearing 1: January 28, 2025 at 2:30PM in the Council Chambers Room and virtually via Zoom.
- Focus Group 1: January 28, 2025 at 1:30PM virtually via Zoom.
- Focus Group 2: January 29, 2025 at 2PM in-house with Township staff.
- Public Hearing 2: June 18, 2025 in the Council Chambers Room
- 30-Day Public Review Period: June 5, 2025 through July 5, 2025. On June 5, 2025 the Township advertised that copies of the draft FY 2025-2029 Consolidated Plan and FY 2025 Action Plan were available to the public for review and comment at <https://www.hamiltonnj.com/> and in-person at the Department of Community and Economic Development office for 30 days starting June 5, 2025.
- The Hamilton Township Council approved the 2025-2029 Consolidated Plan and FY 2025 Action Plan at their June 2025 Council meeting for submission to HUD.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)

**Table 4– Citizen Participation Outreach**

## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

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

## **NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

The Township is aware of the need for and importance of maintaining, repairing and upgrading the Township's public facilities and infrastructure to preserve the community's general well-being. Further, these facilities and this infrastructure are critical to maintain and preserve commercial and residential areas and attract development. The Township will strive to meet the needs of the community through the upkeep of its roads, sidewalks, sewers, bridges, parks and public buildings. Priority funding will be given to Township-owned facilities and structures. Secondary funding for non-Township-owned, non-profit facilities will be funded for programs administered in collaboration with the Township's programs.

Hamilton Township has a need for Public Facilities/Infrastructure improvements, including parks, recreational facilities and public infrastructure such as street, water, sewer and drainage improvements, and for assistance to public service providers, both public agencies and non-profits.

In addition, the Township has a need to address the inventory of vacant and abandoned properties located in the Township.

### **How were these needs determined?**

Non-housing Community Development needs and priorities were identified while preparing this Consolidated Plan through the input of community leaders, citizen participation, and requests and ideas from a wide range of service providers and public agencies. These inputs were provided in a series of meetings and public hearings described in the public participation section of this Plan.

### **Describe the jurisdiction's need for Public Improvements:**

The Township is faced with the physical problems of older public improvements including streets, water and sewer systems, and public buildings. Thus, the need to repair and replace aging infrastructure is ongoing. The repair of roads, sidewalks and public spaces are necessary to support neighborhood livability objectives. These activities provide visual evidence of neighborhood improvements and directly reinforce the efforts being made in maintaining and upgrading the housing stock.

### **How were these needs determined?**

Needs were determined through consultation with local residents and various departments of Township government. These needs were confirmed through on-site infrastructure inspections and by staff knowledge of the Township's infrastructure.

### **Describe the jurisdiction's need for Public Services:**

The Township wishes to do all that it can to improve the quality of life for its most vulnerable low- and moderate-income populations, including the elderly, the disabled, and the homeless. Many of the non-profit agencies serving the neediest in Hamilton's low-income neighborhoods rely on CDBG funds to

serve the greatest number of citizens possible. Public Services play a vital role in providing for some of the most vulnerable residents, and Public Services are increasingly in demand.

**How were these needs determined?**

Needs were determined through consultation with residents, local organizations and various departments of Township government. These needs were confirmed through anecdotal experience of the CD program’s long-tenured staff.

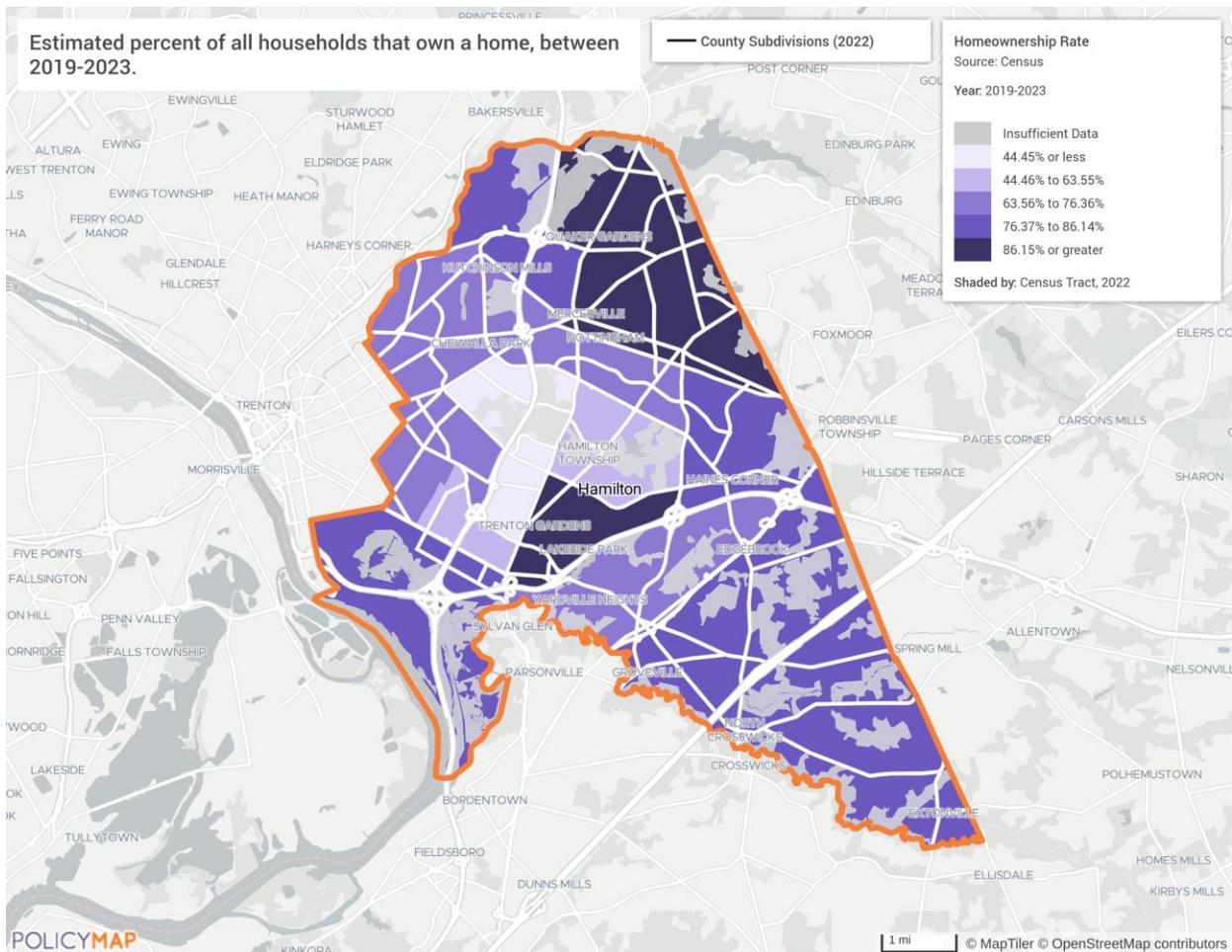
# Housing Market Analysis

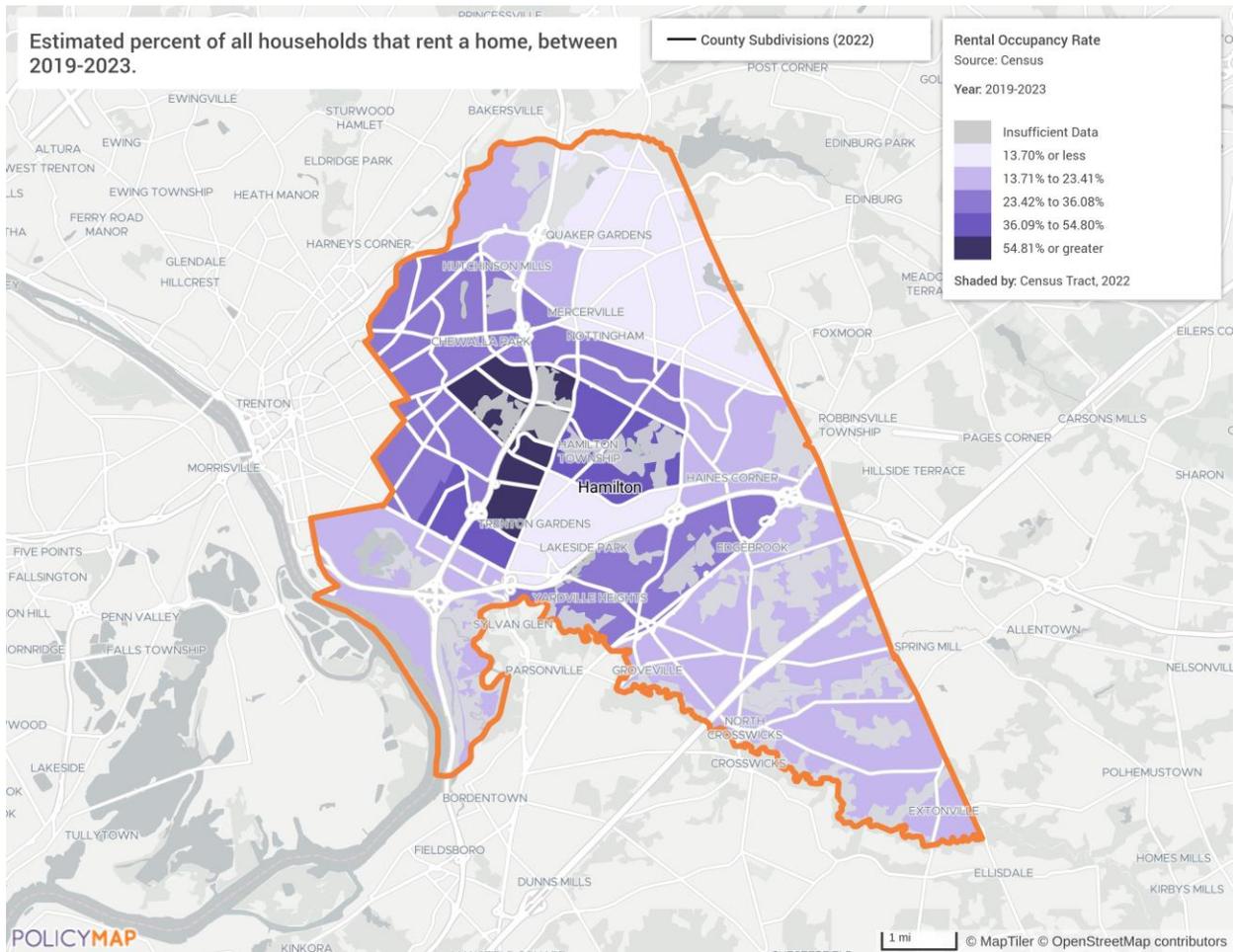
## MA-05 Overview

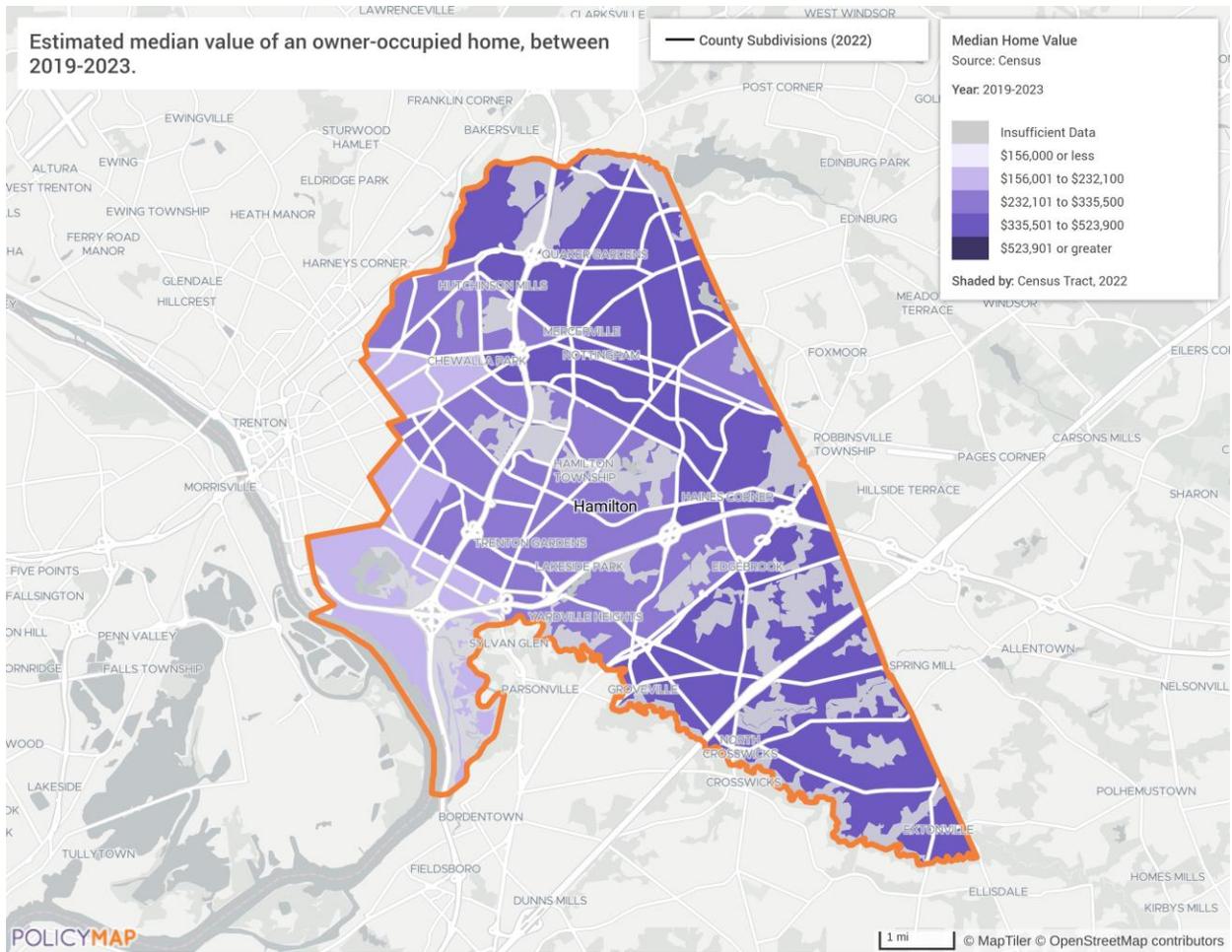
### Housing Market Analysis Overview:

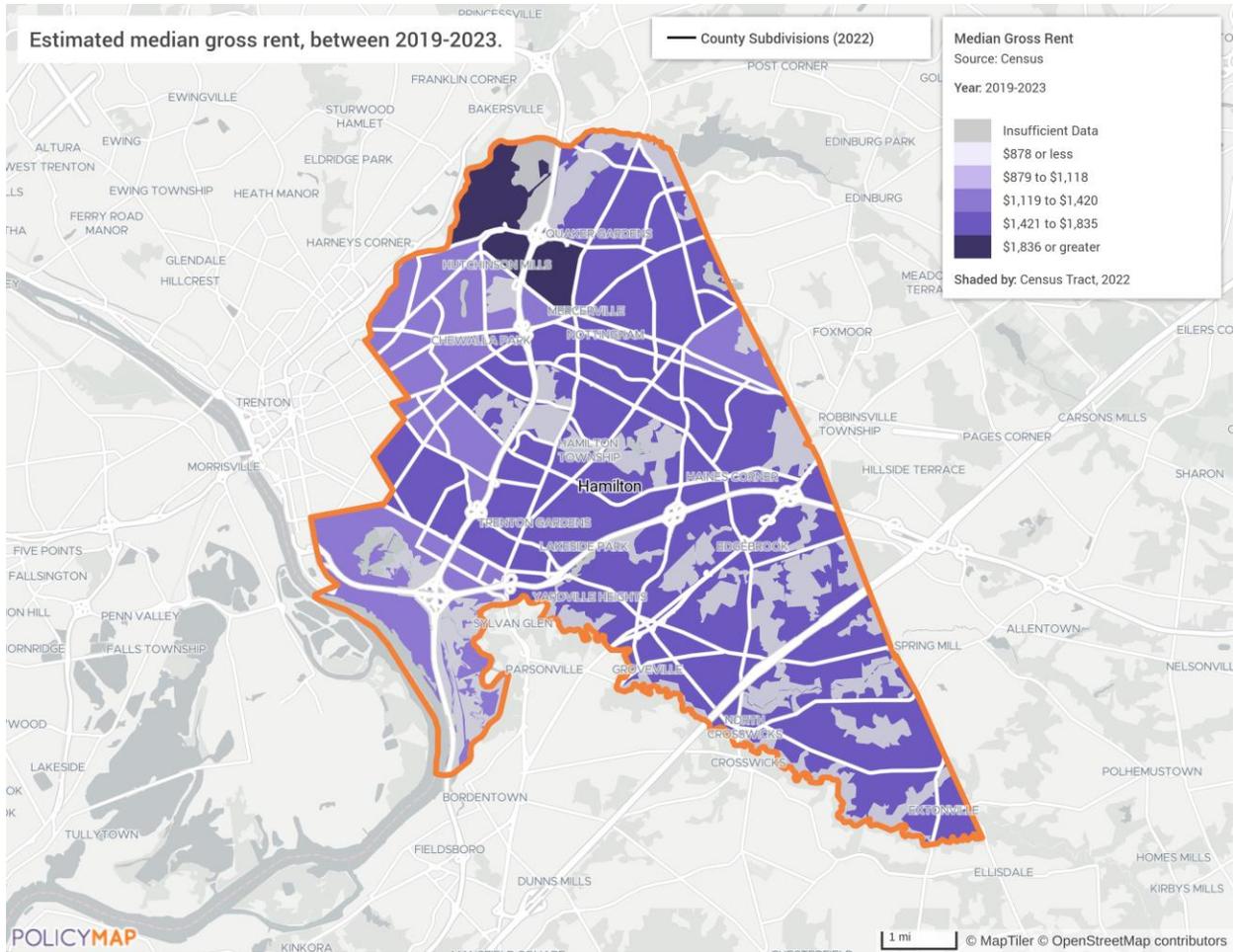
Housing costs in New Jersey are generally high. Mercer County, home to the state capital of Trenton, and Hamilton Township are no exceptions to this general rule. As the area maps show, both for-sale units and rental units are likely to produce at least a modicum of cost burden for low- and moderate-income households in Hamilton Twp. Various federal and state resources are available to help address this issue, but none in sufficient quantity to meet the need.

While housing costs are the downside in a densely populated, cosmopolitan area, the upside of that circumstance is that there are opportunities for employment and training within proximity of most residents. Supporting those opportunities and the network that connects residents to them has a greater chance of success at bridging income gaps.











## MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

### Introduction

The Township is in need of increased support to economic development activities which are critical to growth and revitalization. As noted in the Housing Needs Assessment and the Housing Market Analysis, good, well-paying jobs are the means to secure economic stability, improve neighborhoods and obtain decent housing. The Township's economic development needs center upon obtaining new jobs and providing the workforce to take those jobs. The Township also recognizes the need to support small business growth and development.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	105	16	0	0	0
Arts, Entertainment, Accommodations	3750	3268	11	11	0
Construction	1354	1941	4	6	2
Education and Health Care Services	7907	6493	24	21	-3
Finance, Insurance, and Real Estate	2777	1591	8	5	-3
Information	878	1140	3	4	1
Manufacturing	2274	2943	7	10	3
Other Services	1510	1557	5	5	0
Professional, Scientific, Management Services	4470	3226	13	11	-2
Public Administration	0	0	0	0	0
Retail Trade	4608	4995	14	17	3
Transportation & Warehousing	1549	2138	5	7	2
Wholesale Trade	1982	915	6	3	-3
Grand Total	33164	30223	-	-	-

**Table 5 - Business Activity**

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

## Labor Force

Total Population in the Civilian Labor Force	49905
Civilian Employed Population 16 years and over	45615
Unemployment Rate	8.54
Unemployment Rate for Ages 16-24	29.55
Unemployment Rate for Ages 25-65	5.82

**Table 6 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	10145
Farming, fisheries and forestry occupations	2390
Service	4525
Sales and office	12810
Construction, extraction, maintenance and repair	3655
Production, transportation and material moving	2485

**Table 7 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	30979	71
30-59 Minutes	8965	21
60 or More Minutes	3470	8
Total	43414	100

**Table 8 - Travel Time**

Data Source: 2016-2020 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2535	460	1010
High school graduate (includes equivalency)	10795	990	2645
Some college or Associate’s degree	11730	885	2170
Bachelor’s degree or higher	12355	495	1995

**Table 9 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	105	439	474	584	995
9th to 12th grade, no diploma	779	510	615	1380	1665
High school graduate, GED, or alternative	2595	2545	3230	8660	6565
Some college, no degree	3100	2240	2415	5490	2435
Associate’s degree	505	1130	1120	2395	670
Bachelor’s degree	1020	2805	2235	5180	1369
Graduate or professional degree	45	1010	1305	2305	1235

**Table 10 - Educational Attainment by Age**

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	190668
High school graduate (includes equivalency)	259186
Some college or Associate’s degree	280512
Bachelor’s degree	363812
Graduate or professional degree	416194

**Table 11 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

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

Residents of the Township represent all sectors of the economy with the largest numbers employed in Education (7,907); Retail (4,608); Professional/Management (4,470); Arts/Entertainment (3,750); Finance (2,777) and Manufacturing (2,274).

**Describe the workforce and infrastructure needs of the business community:**

Hamilton Township is a first ring suburb of Trenton, New Jersey. As such its industrial and commercial base centered around Trenton and along the main highway arteries radiating out from the City. Hamilton has sizeable economic base with 30,223 jobs. The most significant sectors of the economy include Retail Trade, Health Services, Education and various businesses within the hospitality sector such as restaurants and food establishments. These industries require a workforce with skills ranging from basic skills training and customer service to very specialized and licensed skills that might be tied to jobs in the construction trades or health services sectors.

The Township’s workforce is very diverse and well suited to finding employment in these industries both locally and regionally.

Like businesses everywhere, employers are seeking a workforce that has good basic skills and is increasingly literate in areas of technology. This is true even in the most basic sectors of the economy. Customer service skills and an ability to problem solve are also key issues for many employers.

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

Hamilton Township is actively recruiting investors to help with the redevelopment of some unused or underutilized retail outlets and industrial properties. For example, the “Suburban Plaza” a virtually empty 244,000 s.f. shopping complex is being demolished and a new shopping center, with Walmart as the anchor store is to be developed. In addition, the former Congoleum property which was recently closed and sold is also being considered for redevelopment. Located in close proximity to the Hamilton Train Station, there are many options being discussed including mixed use residential development; a hotel complex; warehousing; and other uses. If pursued in the near future, these activities will bring new retail, service, and construction jobs to the community.

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

The current workforce is well positioned to take advantage of the jobs in the area. Neighboring Trenton has a large number of public sector jobs which also align with the skill sets of the Township’s workforce.

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

Given the significance of the health care industry to the County and Region, the Mercer County Workforce Investment Board is working closely with the local schools and colleges to promote job training in this field. The County’s Technical School initiated a full-time, four-year Health Science Academy. The curriculum has been aligned to meet the needs of local hospitals, research centers and private practices. There are 40 clinical affiliations offered including training as practical nurses, medical assistants, medical technicians, massage therapists and electrocardiograph specialists. All of these jobs offer good entry level positions for residents in CDBG neighborhoods seeking to expand their employment skills or seek new employment opportunities. In addition, the County College offers career training in Advanced Manufacturing, Healthcare, Hospitality and various IT fields. Again, these career paths align well with the local workforce and the needs of the area employers. The County WIB has also developed a plan to deal with the challenges facing many CDBG and other area residents such as literacy, school dropouts, unemployed veterans and others.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Hamilton Township and Mercer County are included in the CEDS prepared by the Delaware Valley Regional Planning Commission, a nine-county, Philadelphia-based organization representing both Pennsylvania and New Jersey counties.

The DVRPC CEDS embraces key Mercer County priorities including enhancing facilities at the Mercer County Airport; supporting heritage and sports tourism; redeveloping the former American Cyanamid site. Given the close proximity of these facilities to Hamilton Township, there will be new opportunities created for local residents. In addition, given that the Township is home to the Garden for Sculpture, a focus on tourism development will have a direct impact on the community.

In addition, the Mercer County One Stop Career Center provides employment counseling and training services to Township citizens and others seeking assistance with their employment needs. Through the local Small Business Development Center, including the New Jersey Latino Business Center, there are start-up and entrepreneurial services, seminars and counseling programs provided. A fund for low interest loans and a foreign trade zone are other programs offered to local residents and businesses.

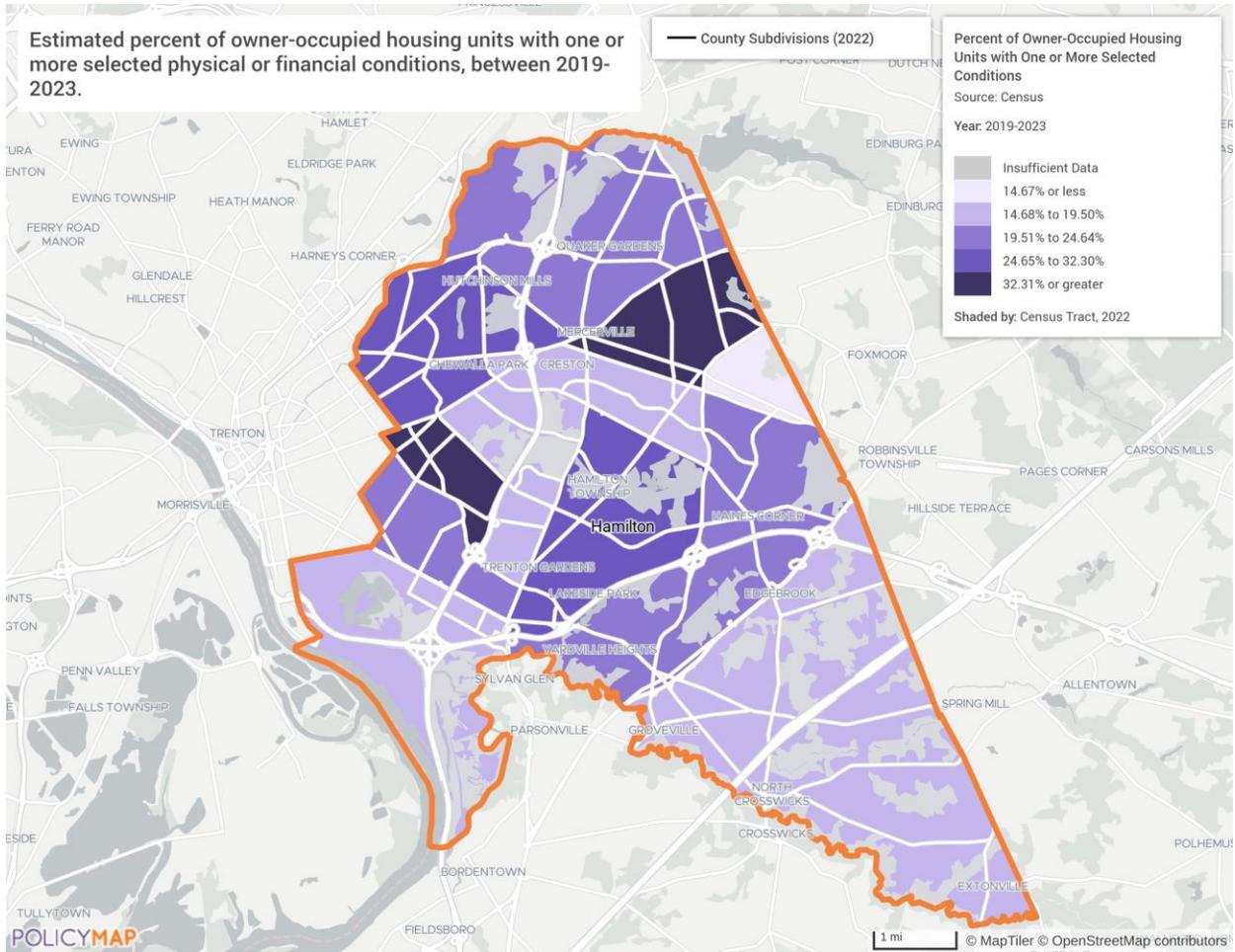
These services offer a full array of programs for entry-level, continuing education, unemployment assistance and other needs facing residents of the CDBG neighborhoods.

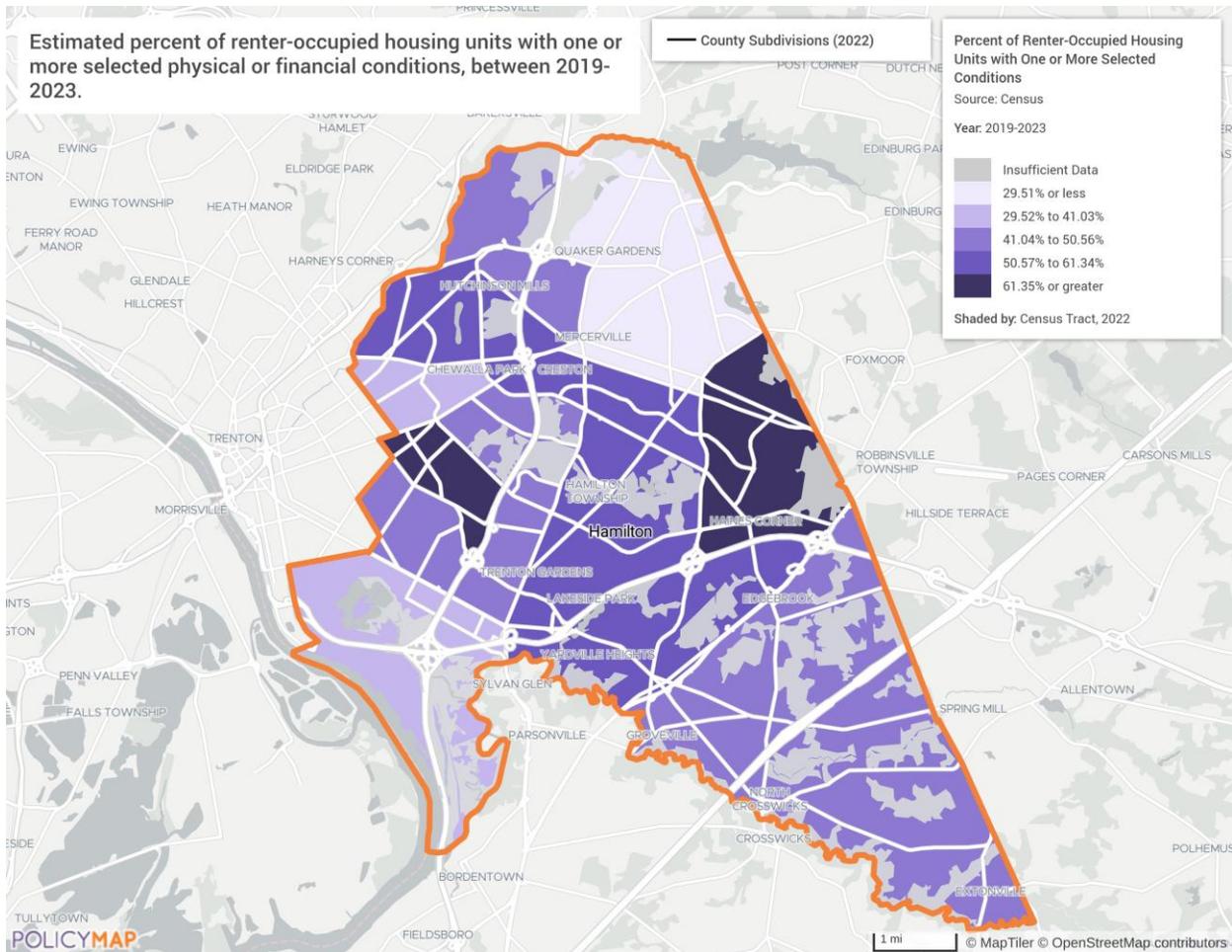
## **Discussion**

## **MA-50 Needs and Market Analysis Discussion**

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

According to the most recently available low- and moderate-income data provided by HUD (2016-2020 ACS), there are nine Census Tracts that contain at least one low- to moderate-income block group. These are: Census Tracts 25, 26.01, 26.02, 27.01, 27.02, 28, 29.02, 30.04, and 20.09. These areas coincide with or are in close proximity to Census Tracts where at least 50% of owner or renter households experience at least one of the four housing problems.





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

According to the most recently available low- and moderate-income data provided by HUD (2016-2020 ACS), there are nine Census Tracts that contain at least one low- to moderate-income block group. These are: Census Tracts 25, 26.01, 26.02, 27.01, 27.02, 28, 29.02, 30.04, and 20.09.

Hamilton Township focuses particular attention on neighborhoods having larger concentrations of low-income households, specifically the Bromley community and the Cedar Lawn community. Both areas border the City of Trenton, have a mix of land uses, have older homes and a concentration of low-income households, where concentration is defined as more than 50% above the Township average.

An 'area of racial/ethnic minority concentration' is defined as a census tract which has a minority population percentage exceeding the townwide percentage by at least 10%. Hamilton Township has a minority population of 41.3%. Using this definition, there are seven Census

Tracts that are considered areas of racial/ethnic concentration. These are Census Tracts 25, 26.01, 26.02, 27.01, 27.02, 28, and 29.02.

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

These areas have a higher percentage of renters than homeowners and are characterized by an older housing stock. Compared to other parts of the Township, these areas have lower market values and a higher prevalence of abandoned or foreclosed properties.

**Are there any community assets in these areas/neighborhoods?**

Community assets in these areas include access to public transportation, community centers, and employment opportunities.

**Are there other strategic opportunities in any of these areas?**

Per HUD regulations, the Township will use a minimum of 70% of CDBG funds to benefit low- and moderate-income residents.

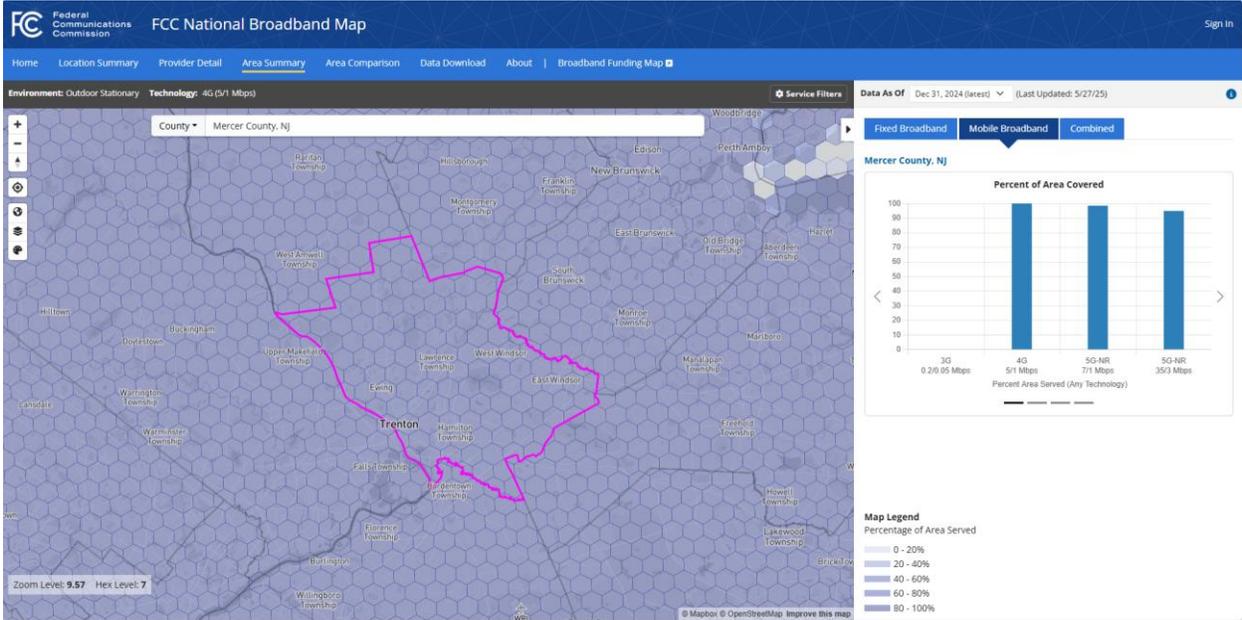
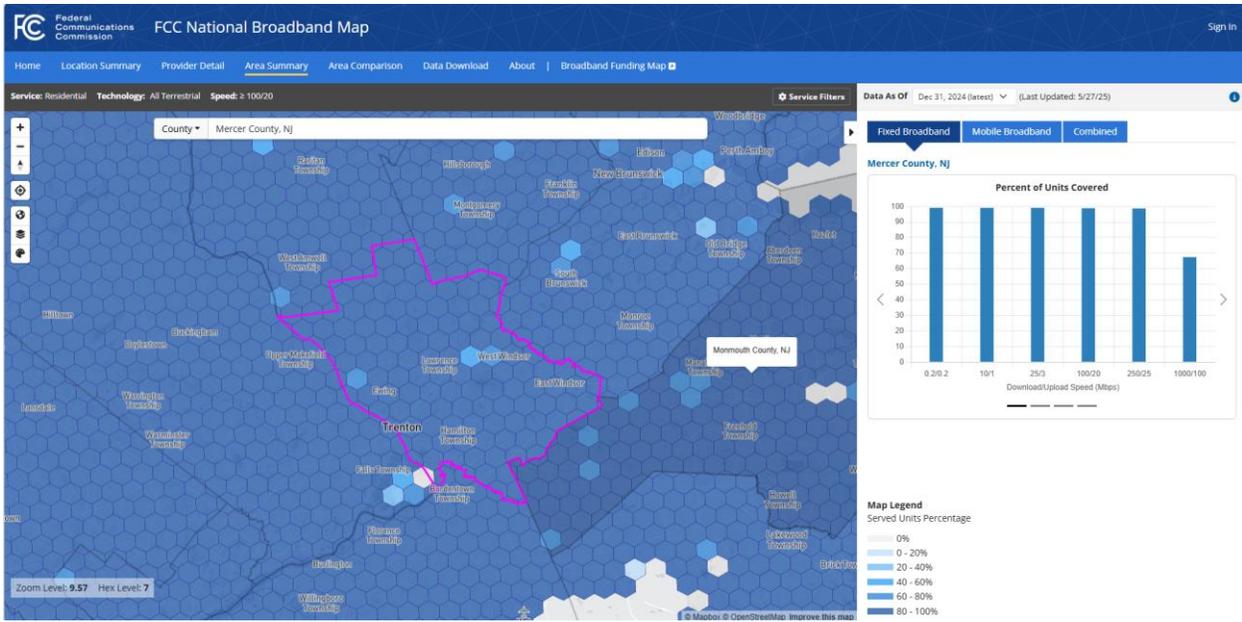
**MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

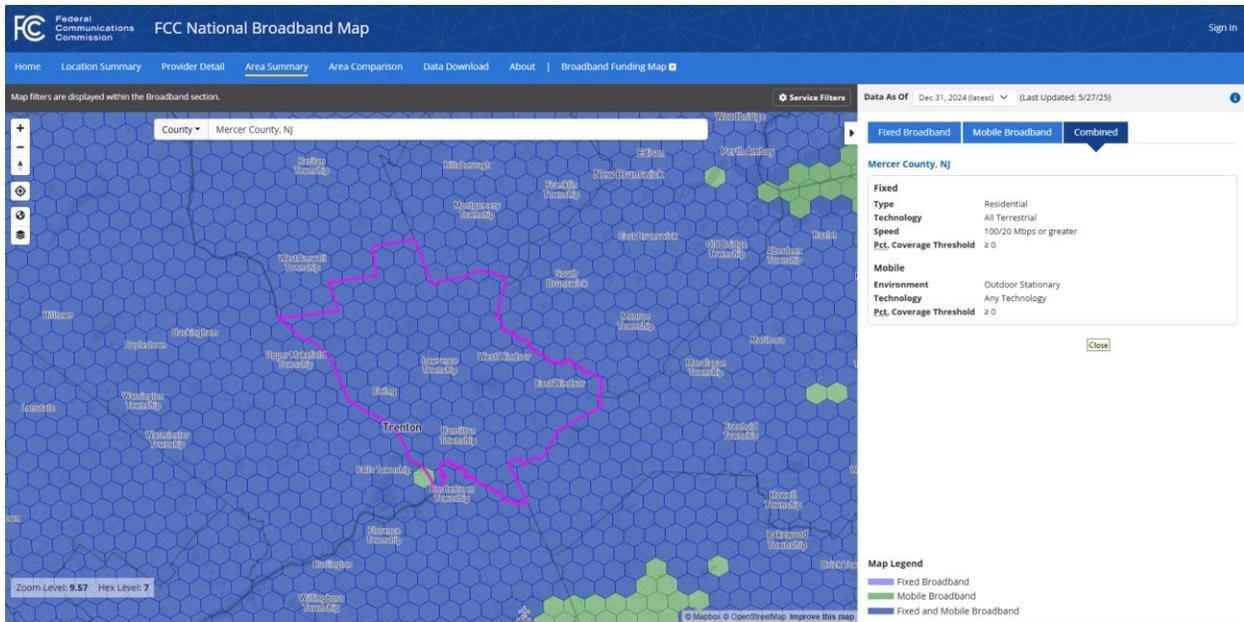
**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

According to data from the FCC, almost all residential areas of Hamilton Township have at least 2 wired broadband providers. Competition reduces prices, with a monopoly there is no alternative to offering the service.

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

According to data from the FCC, almost all residential areas of Hamilton Township have at least 2 wired broadband providers. Competition reduces prices, with a monopoly there is no alternative to offering the service.





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

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

The Mercer County Multi-Jurisdictional Hazard Mitigation Plan 2021 Update has identified the following natural hazard risks in Hamilton Township:

- Dam Failure (High Risk)
- Disease Outbreak (High Risk)
- Drought (Medium Risk)
- Earthquake (Low Risk)
- Flood (High Risk)
- Geological Hazards (Low Risk)
- Hazardous Materials (High Risk)
- Hurricane/Tropical Storm (High Risk)
- Infestation and Invasive Species (High Risk)
- Nor'Easter (High Risk)
- Severe Weather (High Risk)
- Severe Winter Weather (High Risk)
- Wildfire (Medium Risk)

During the review of the hazard/vulnerability risk ranking, the Township of Hamilton changed the hazard ranking for Nor'Easter from medium to high, noting that more storms are expected in the future. The Township agreed with the remainder of the calculated hazard rankings in the 2021 update.

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

The Township's population of low- and moderate-income households are more vulnerable to natural hazard risks due to the fact that they have limited resources available to recover from natural hazard risks should they occur.



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

It is the intention of Hamilton Township to invest its limited federal Community Development Grant funds in ways that will garner long-term, sustainable results. For this reason, the Township has carefully examined its needs for Affordable Housing Development, Preservation of the Existing Housing Stock, Programs to Foster Homeownership, Renovation of Public Facilities and Infrastructure, Public Safety, Public Services and Economic Development. An examination of existing services, housing and the funding sources available to sustain them, with or without Community Development Program assistance, was examined.

Since Public Service activities are capped at no more than 15% of the Community Development Block Grant allocation, the Township elected to continue its course of primarily funding programming at two Township Community Centers that provide a variety of services to low- and moderate-income residents, including youth educational and recreational programs, senior programs and a food pantry.

The housing rehab program remains the highest priority because it's an area of need where the limited program funds can make a difference.

## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

Table 12 - Geographic Priority Areas

1	<b>Area Name:</b>	Locations throughout the Township based on low/low mod income
	<b>Area Type:</b>	
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Housing
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	
2	<b>Area Name:</b>	Township-wide
	<b>Area Type:</b>	Other
	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	

	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	

**General Allocation Priorities**

**Describe the basis for allocating investments geographically within the state**

Hamilton Township focuses particular attention on neighborhoods having larger concentrations of low-income households. The intent is to address problems and to provide services to residents most in need.

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 13 – Priority Needs Summary

1	<b>Priority Need Name</b>	Housing Rehabilitation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Maintain and Rehabilitate Existing Housing Units
	<b>Description</b>	Funds will be used to provide grants to eligible homeowners for porpoerty improvements. Additionally, funds will be used to provide window air-conditioning units to eligible seniors.
	<b>Basis for Relative Priority</b>	The Township has an ongoing need for housing rehabilitation program, as evidenced by the current program waitlist and conditions of housing throughout the Townshiup. The program is within the scope of the Township's CDBG program, meaning that it can be funded at levelks that make a difference for vulnerable residents.
	2	<b>Priority Need Name</b>
<b>Priority Level</b>		High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Improvements to Public Facilities
	<b>Description</b>	Improvements to public facilities, both owned by the municipality and those owned by non-profit organizations, that are used to meet the needs of the Township's low- and moderate-income residents and are in need of repairs or improvements. Examples include community centers, parks, and non-profit facilities.
	<b>Basis for Relative Priority</b>	Improvements to public facilities, both owned by the municipality and those owned by non-profit organizations, that are used to meet the needs of the Township's low- and moderate-income residents and are in need of repairs or improvements. Examples include community centers, parks, and non-profit facilities.
<b>3</b>	<b>Priority Need Name</b>	Public Infrastructure Improvements
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Infrastructure Improvements
	<b>Description</b>	Street reconstruction and other infrastructure improvements in eligible neighborhoods.
	<b>Basis for Relative Priority</b>	Vital need for street reconstruction and other infrastructure improvements in eligible neighborhoods.
4	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other

	<b>Associated Goals</b>	Support Public Services
	<b>Description</b>	Funding for public service activities that provide a wide range of assistance to low- and moderate-income individuals and families, including recreation, information, educational programming for youth and adults, and more.
	<b>Basis for Relative Priority</b>	These services range from improving the quality of life to maintaining viable living environments and the provision of essentials such as food and shelter.
<b>5</b>	<b>Priority Need Name</b>	Elimination of Slum and Blight
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	
	<b>Description</b>	Demolition of blighted structures on a spot basis.
	<b>Basis for Relative Priority</b>	Empty, deteriorated properties pose a hazard to Township residents and generally have a detrimental effect on neighborhoods and the Township as a whole.
<b>6</b>	<b>Priority Need Name</b>	Planning and Administration
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Planning and Administration
	<b>Description</b>	Planning and general administration of the Township's CDBG program.

<b>Basis for Relative Priority</b>	Operation of the CDBG program within the regulations is essential to the program's continuation.
------------------------------------	--

**Narrative (Optional)**

The Consolidated Plan documents housing and community development priorities to be used as a guide to achieve a series of objectives over a five-year period, from Fiscal Year 2025 to Fiscal Year 2029. Each Need/Objective is addressed by one or more five-year measures based on an analysis of the Needs identified by the staff, Township Administration and responsible Departments.

**SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

As a CDBG entitlement community, Hamilton Township receives an annual allocation of Block Grant funds from HUD. For the 2025 program year, that amount has been announced at \$603,600.00. The amount anticipated for the remaining four years covered by this Consolidated Plan is based on 4 times the current allocation.

**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	603,600	0	0	603,600	2,414,400	Amount expected for the remainder of the Con Plan is the annual allocation times four.

**Table 14 - Anticipated Resources**

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

The federal CDBG 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.

As it has in previous years, Hamilton Township will partner with other public agencies and non-profit organizations with similar goals to leverage resources and maximize outcomes in housing and community development.

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

The Township has no publicly owned land that will be used to address the needs identified in the plan to date.

**Discussion**

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
HAMILTON TOWNSHIP (MERCER COUNTY)			Jurisdiction
MERCER COUNTY			Region

**Table 15 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

While a wide variety of government and non-profit entities exist to meet the needs of Township residents, all face fiscal challenges compounded by continued high demand for services. Over the course of the five years covered by this Consolidated Plan, Hamilton Township plans to partner with a number of these entities to strengthen their ability to address unmet needs.

The Township will implement the Consolidated Plan through its Department of Community Planning & Compliance and other departments, including Public Works. Non-government partners will include area non-profits and the public housing agency.

Hamilton Township’s Department of Community Planning & Compliance is the clearinghouse and facilitator for the activities described in its 2025-2029 Consolidated Plan. As the local unit of government, the Township is empowered to apply for and administer CDBG funds. The Neighborhood Preservation Program Director oversees the administration of all CDBG activities. The Department also applies for and administers other funding sources, ensuring all resources are highly integrated and administered efficiently. The Department is responsible for:

- Program management and oversight
- Inter-department/Agency coordination
- Sub-recipient contract administration and monitoring
- Program evaluation
- Report preparation and submission
- Public education and participation
- Special project development
- Consolidated Plan and Annual Plan preparation, monitoring, and evaluation
- Administration of housing programs.

The major gap continues to be that resources and staff are below levels needed to optimally operate programs. Coordination with County and regional providers ensures that overlap of missions is minimized and facilitates more efficient use of resources.

Additionally, the examination of the gaps in the service delivery system is an ongoing effort by the Mercer County Department of Social Services as well as the Comprehensive Emergency Assistance Strategy (CEAS) Committee and Continuum of Care agencies. These agencies will continue to evaluate the needed services. Though these entities work well together, there are opportunities for improved coordination and communication. All agencies involved in these efforts continue to seek new ways to better serve their target populations and the general public.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
<b>Other</b>			
	X	X	

**Table 16 - Homeless Prevention Services Summary**

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

The Township’s strategy for implementing its homelessness program is a multiple approach to the problem, focusing first on the prevention of homelessness, the medical and substance abuse treatment

and counseling of homeless persons, and third, the provision of emergency services for homeless persons and families.

The strategy for eliminating chronic homelessness flows from the strategies described above. Treating the homeless and providing the means and support necessary to make the transition to permanent housing and independent living are all a part of the efforts and programs in place in the Township and the County. The institutions and structure to properly address this issue are in place and are described in the homeless inventory section of the Consolidated Plan.

As noted earlier in establishing priorities, the prevention of homelessness is a key element in the Township's efforts. By providing rehabilitation assistance and referral services for low-income households we hope to prevent the conditions that would precipitate homelessness.

The Mercer County Board of Social Services is the main referral for homeless individuals and families. Consequently, all cases of homeless individuals and families are referred to Mercer County. In previous years, families with children were referred there to Mercer County Board of Social Services as were Senior Adults, Disabled, or Handicapped people that needed help, they were referred to Adult Protective Service. Homeless people with alcohol or drug abuse were referred to either "Arm in Arm" (formerly Crisis Ministries) or given telephone numbers to detoxification units that were in Mercer County. The Township currently has an agreement with Mercer County Board of Social Service for cooperative assistance, whether it be informational of sorts of actual assistance.

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

The strength of the support network is that its component organizations are consistently staffed by competent, dedicated professionals and volunteers driven to make a difference where they can. The cooperation and coordination within the network maximizes efficiency and, thus, the likelihood of positive outcomes for those it serves.

Gaps in the support system exist largely because of widespread and chronic shortfalls in resources. Service providers are regularly stretched to capacity, even those with a strong volunteer component

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

The strategy is to keep the channels of communication and the culture of cooperation going strong so that resources can be leveraged and efficiency optimized.

**SP-45 Goals - 91.415, 91.215(a)(4)**

**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Planning and Administration	2025	2029	Non-Housing Community Development	Township-wide	Planning and Administration	CDBG: \$603,600	Other: 5 Other
2	Maintain and Rehabilitate Existing Housing Units	2025	2029	Affordable Housing	Locations throughout the Township based on low/low mod income	Housing Rehabilitation	CDBG: \$525,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	Improvements to Public Facilities	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income	Public Facility Improvements	CDBG: \$110,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6540 Persons Assisted
4	Support Public Services	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income Township-wide	Public Services	CDBG: \$452,700	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
5	Infrastructure Improvements	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income	Public Infrastructure Improvements	CDBG: \$1,326,700	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted

**Table 17 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Administration of the CDBG program per HUD regulations.
2	<b>Goal Name</b>	Maintain and Rehabilitate Existing Housing Units
	<b>Goal Description</b>	Assist homeowners in making needed repairs and improvements. Includes costs of rehabilitation and program delivery costs.
3	<b>Goal Name</b>	Improvements to Public Facilities
	<b>Goal Description</b>	Improvements to public facilities such as community centers, parks, and non-profit facilities that provide services to eligible residents.
4	<b>Goal Name</b>	Support Public Services
	<b>Goal Description</b>	Operating support for vital public services to eligible residents, including recreation, youth and adult educational services, information and referral services, senior services, and more.
5	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	Street reconstruction and other public infrastructure improvements such as water, sewer, and sidewalks. May also include accessibility improvements.

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

Outside of the Township's housing rehabilitation program, the Township does not propose to provide any additional affordable housing with CDBG funding.



## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

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

The Township will continue to test for lead-based paint hazards as requested by the County Health Department. When a high reading is found it is brought to the attention of the housing rehabilitation office. Dwelling units with children present under the age of 6 are prioritized for immediate assistance. The housing rehabilitation coordinator then proceeds with arranging the necessary financial assistance if available to income-eligible applicants to remediate the lead problem. Firms that specialize in the testing and remediation of this problem are consulted. The Township will also continue a public education campaign so recipients of assistance and local contractors are aware of lead hazards. All programs administered by the Township are administered in accordance with 24 CFR 35.

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. Lead-based paint was banned in 1978, but housing constructed prior to that time typically contains lead-based paint to some degree.

Studies have shown that the lead-based paint hazard lessens with newer construction. That is, a unit constructed between 1960 and 1979 has a 62% chance of having this hazard; units built from 1940 to 1959 have an eighty (80) percent chance; units built prior to 1940 have a 90% chance.

All pre-school children are required by the State to be lead tested prior to attending school and local doctors routinely conduct lead tests on young children. The Township will continue to test for lead-based paint hazards as requested by the County Health Department. When a high reading is found it is brought to the attention of the housing rehabilitation office. Dwelling units with children present under the age of 6 are prioritized for immediate assistance. The program coordinator then proceeds with arranging the necessary financial assistance if available to income-eligible applicants to remediate the lead problem. Firms that specialize in the testing and remediation of this problem are consulted. Inspectors involved in the Township's owner occupied housing rehabilitation program funded with CDBG, HOME or other State-funded programs are experienced in the detection and abatement of lead-based paint and each property built prior to 1978 and have received training on EPA regulations regarding lead paint.

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

Risk assessments are included for all pre-1978 housing in the Township's rehab program when painted surfaces are to be disturbed. Testing of children is a standardized requirement.

The Township will continue to implement the following initiatives to reduce the hazards of lead based paint in homes occupied by LMI households:

- A grant/loan program to finance lead abatement in housing units occupied by LMI households.

- Educational programs on lead poisoning hazards for the general public.
- In conjunction with any application for housing rehabilitation, units will be tested for the presence of lead-based paint, and hazard reduction will be required as part of any rehabilitation project.
- Housing inspectors will continue to be trained and licensed for lead-based paint detection, and the presence of such will be an item identified during housing inspections.
- Pursue all available State and federal funding for lead-based paint abatement.

## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

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

The Township views its activities to address affordable housing, prevent homelessness and to improve the economic prospects of its low-income residents as a part of a comprehensive effort to reduce the level of poverty in the Township. Hamilton supports programs and activities that promote a stable and growing economy. As a result, the Township's anti-poverty strategy is inextricably linked to the economic programs that have been implemented and operated for several years.

The objective of poverty reduction requires programming for broad areas including job training and placement, 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.

The following programs contribute to this strategy:

1. Affordable Housing Planning – The Township completed and submitted an aggressive affordable housing plan to the State/Courts that would increase the number of affordable housing units in the Township by over 100 units. In addition, Hamilton Township is assisting HomeFront a local non-profit with Affordable Housing trust funds to rehab and operate a transitional living facility for low income grandparents raising disabled grandchildren. These efforts provide quality affordable housing in the Township and are a central component of the anti-poverty strategy. Another Project with Isles for the conversion of an old factory into a multi-use building is being planned. Usage will be low-income housing, market rate apartments, and office space.
2. Housing Rehab Program – Individual low-income homeowners can apply for grants to rehabilitate their substandard housing units. This program is funded by the CDBG program and has resulted in substantial improvements.
3. CDBG Public Facility Improvements - CDBG funds are used to improve the physical condition of the low income neighborhoods in Hamilton through park improvements as well as street and sidewalk improvements.
4. WIC – Hamilton Township operates the WIC program which is an important part of the anti-poverty strategy.
5. Bromley Center – The Bromley Center, partially funded with CDBG Funds provides vital job training and other community services to low-income residents.
6. Wilson Center – The Wilson Center and the day camp (funded partially with CDBG funds) provides important services to low-income residents and their children.

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

The Township's anti-poverty strategy is inextricably linked to the Township's economic programs. The objective of poverty reduction requires programming for broad areas including job training and placement, 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.

It is essential to provide the basic skills, training, and education necessary to make a person employable in today's competitive job market. The Township works with the Board of Education to assist persons obtain high school diplomas or the GED certificate. The Township facilitates and supports programs to coordinate training programs provided by public institutions with the needs of employers. However, other education and training programs contribute to achieving the objective of reducing poverty. Examples of these include job training and job placement activities sponsored by the Workforce Investment Board, and the Division of Social Work Services, the Welfare to Work Program, day care funding throughout the Township, long-term employment opportunities for severely disabled adults, and life skills development programs. The Mercer County Vocational and Technical Schools, the Mercer County College, and the Continuing Education Program also provide important training and educational opportunities for local residents.

The Township 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 housing rehabilitation and funding for the Bromley Community Center. This type of assistance is provided to assist people from becoming trapped in the cycle of poverty and to ameliorate housing problems and costs.

In sum, the programs currently operated represent coordinated efforts to address housing and economic issues that surround the homeless and lower income households.

## **SP-80 Monitoring - 91.230**

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

Internal controls have been designed to ensure adequate segregation of duties. The Neighborhood Preservation Office prepares agreements for non-housing activities supported by CDBG and establishes accounts. Invoices are monitored for compliance with the approved spending plan and federal regulations.

The following procedures are in place to ensure long-term compliance with program requirements:

1. Planning – Planning, including the public participation process, must begin in January of each year in order to ensure timely submission of the action plan. Each project is evaluated in terms of its eligibility and the appropriate performance measures are chosen for each activity.
2. The New Program Year – At the beginning of each program year, the Environmental Review Record is completed. In addition, each new program is entered into IDIS. Files are also established with all required supporting documentation. Sub-recipient agreements are completed.
3. On-going Program Management – Performance measurement data collection on the progress of each activity is completed on a quarterly basis and entered into IDIS. The CDBG program manager also conducts a site visit at the Wilson Center annually to ensure that appropriate documentation is kept on file.
4. End of Year Reporting – The CAPER is submitted to HUD each year. Performance measures data is collected for all open projects. Other monitoring reports include the Section 3 report due with the CAPER and the Minority Business Enterprise Report due October 10.

Sub-recipient monitoring will occur through regular telephone and on-site monitoring visits by the Neighborhood Preservation Director. These on-site visits with administrative staff of the agency or entity which has received funding will occur as necessary, but will be conducted at least once a year. The sub-recipient will provide the Director with an annual report and a list of all Township clients served by the program.

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

As a CDBG entitlement community, Hamilton Township receives an annual allocation of Block Grant funds from HUD. For the 2025 program year, that amount has been announced at \$603,600.00. The amount anticipated for the remaining four years covered by this Consolidated Plan is based on 4 times the current allocation.

#### 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	603,600.00	0.00	0.00	603,600.00	2,414,400.00	Amount available for the remained of ConPlan is the annual allocation times four.

Table 18 - 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 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.

As it has in previous years, Hamilton Township will partner with other public agencies and non-profit organizations with similar goals to leverage resources and maximize outcomes in housing and community development.

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

The Township has no publicly owned land that will be used to address the needs identified in the plan to date.

**Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Planning and Administration	2025	2029	Non-Housing Community Development	Township-wide	Planning and Administration	CDBG: \$120,720.00	Other: 1 Other
2	Maintain and Rehabilitate Existing Housing Units	2025	2029	Affordable Housing	Locations throughout the Township based on low/low mod income	Housing Rehabilitation	CDBG: \$105,000.00	Homeowner Housing Rehabilitated: 5
3	Improvements to Public Facilities	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income	Public Facility Improvements	CDBG: \$22,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1635 Persons Assisted
4	Support Public Services	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income Township-wide	Public Services	CDBG: \$90,540.00	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Infrastructure Improvements	2025	2029	Non-Housing Community Development	Locations throughout the Township based on low/low mod income	Public Infrastructure Improvements	CDBG: \$265,340.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted

**Table 19 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Administration of the CDBG program per HUD regulations.
2	<b>Goal Name</b>	Maintain and Rehabilitate Existing Housing Units
	<b>Goal Description</b>	Assist homeowners in making needed repairs and improvements. Includes costs of rehabilitation and program delivery costs.
3	<b>Goal Name</b>	Improvements to Public Facilities
	<b>Goal Description</b>	Improvements to public facilities such as community centers, parks, and non-profit facilities that provide services to eligible residents.
4	<b>Goal Name</b>	Support Public Services
	<b>Goal Description</b>	Operating support for vital public services to eligible residents, including recreation, youth and adult educational services, information and referral services, senior services, and more.

5	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	Street reconstruction and other public infrastructure improvements such as water, sewer, and sidewalks. May also include accessibility improvements.

## AP-35 Projects - 91.420, 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 Township, Hamilton Township plans a mix of activities in FY 2025 to address a wide range of challenges for those populations. Infrastructure improvements, housing rehab and programming and support for area non-profit service providers are just some of the approaches to strengthening neighborhoods, houses and, most importantly, families in Hamilton Township.

#	Project Name
1	Planning and Administration
2	Housing Rehabilitation Program and Housing Rehabilitation Administration
3	Support Public Services
4	Infrastructure Improvements
5	Bromley Center Elevator

Table 20 – Project Information

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

In allocating CDBG funds, the Township endeavored to fund activities that were deemed to have the greatest benefit to residents in a timely, efficient manner. The aim was to provide benefits in coordination with other support structures to avoid redundancy.

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

- Meeting the statutory requirements of the CDBG Program
- Meeting the needs of low- and moderate-income residents
- Focusing on low- and moderate-income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact and
- The ability to demonstrate measurable progress and success.

## AP-38 Project Summary

### Project Summary Information

Project Summary Information					
#	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	Planning and Administration	Planning and Administration	Township-wide - Other	Planning and Administration	CDBG : \$120,720.00
	Description	Grant Administration			
	Target Date for Completion	06/30/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	N/A			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Township-wide			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Grant administration			
2	Housing Rehabilitation Program and Housing Rehabilitation Administration	Maintain and Rehabilitate Existing Housing Units	Locations throughout the Township based on low/low mod income - Other	Housing Rehabilitation	CDBG : \$105,000.00
	Description	Maintain and rehabilitate existing housing units. Provision of homeowner grants for code improvements, emergency repairs, handicapped accessibility improvements to single-family owner-occupied housing units and project delivery and inspection costs. Direct Program Costs: \$45,000.00 Administrative Costs: \$60,000.00			
	Target Date for Completion	06/30/2026			

Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	It is estimated that 5 households will benefit from this activity.			
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Township-wide			
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Maintain and rehabilitate existing housing units. Provision of homeowner grants for code improvements, emergency repairs, handicapped accessibility improvements to single-family owner-occupied housing units and project delivery and inspection costs. Direct Program Costs: \$45,000.00 Administrative Costs: \$60,000.00			
Support Public Services	Support Public Services	Township-wide - Other	Public Services	CDBG : \$90,540.00
Description	John O. Wilson Center: \$8,540.00 YMCA Summer Camp: \$17,000.00 Arm in Arm: \$15,000.00 Bromley Center Staffing: \$50,000.00			
Target Date for Completion	06/30/2026			
Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)				
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	John O. Wilson Center: 169 Winifred Avenue YMCA Summer Camp: Arm in Arm: Bromley Center Staffing: 1801 E. State Street			
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	John O. Wilson Center: \$8,540.00 YMCA Summer Camp: \$17,000.00 Arm in Arm: \$15,000.00 Bromley Center Staffing: \$50,000.00			

	Infrastructure Improvements	Infrastructure Improvements	Locations throughout the Township based on low/low mod income - Other	Public Infrastructure Improvements	CDBG : \$265,340.00
	Description	Municipal Infrastructure and/or Parks/Streets			
	Target Date for Completion	06/30/2026			
4	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	TBD			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	TBD			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Municipal Infrastructure and/or Parks/Streets			
	Bromley Center Elevator	Improvements to Public Facilities	Locations throughout the Township based on low/low mod income - Other	Public Infrastructure Improvements	CDBG : \$22,000.00
	Description	Bromley Center elevator repairs.			
	Target Date for Completion	06/30/2026			
5	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	TBD			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	1801 E State Street			

<p>Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)</p>	<p>Bromley Center elevator repairs.</p>
--	---

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

Hamilton Township focuses particular attention on neighborhoods having larger concentrations of low-income households. The intent is to address problems and to provide services to residents most in need.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Locations throughout the Township based on low/low mod income	65
Township-wide	35

**Table 21 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Concentration of low-mod income residents. Due to the nature of the projects and activities to be undertaken, investments in projects and activities such as Public Services, Public Facilities and Infrastructure are limited to the CDBG Target Areas while other projects and activities benefit low- and moderate-income limited clientele and are available townshipwide.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

In the implementation of the 2025 Annual Action Plan, the City will invest CDBG resources to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty level families, develop institutional structure and enhance coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, the high cost of housing that is not affordable to low-income people and the lack of availability of home improvement financing in the private lending industry. To address these obstacles, the Township is investing CDBG funds through the 2025 Action Plan in projects that provide loans to low- and moderate-income homeowners for home improvements, projects that provide public and neighborhood services to low- and moderate-income people and those with special needs, and projects that prevent homelessness. To address underserved needs, the Township is allocating 100% of its non-administrative CDBG investments for the program year 2025 to projects and activities that benefit low- and moderate-income people.

### **Actions planned to foster and maintain affordable housing**

In the implementation of the 2025 Annual Action Plan, the Township will invest CDBG funds to preserve and maintain affordable housing through the Township of Hamilton Residential Rehabilitation Program that will provide up to 5 forgivable loans of approximately \$15,000 to low- and moderate-income owners of single-family housing.

### **Actions planned to reduce lead-based paint hazards**

The Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. To reduce lead-based paint hazards, the Township Residential Rehabilitation Program will conduct lead based paint testing and risk assessments for each property assisted that was built prior to January 1, 1978 and will incorporate safe work practices or abatement into the scope of work as required to reduce lead based paint hazards in accordance with 24 CFR Part 35.

### **Actions planned to reduce the number of poverty-level families**

The implementation of CDBG activities meeting the goals established in the 2025-2029 Consolidated Plan and this Annual Action Plan will help to reduce the number of poverty level families by:

- Supporting activities that expand the supply of housing that is affordable to low and moderate income households;

- Supporting activities that preserve the supply of decent housing that is affordable to low and moderate income households;
- Supporting a continuum of housing and public service programs to prevent and eliminate homelessness;
- Supporting housing preservation programs that assure low-income households have a safe, decent and appropriate place to live;
- Supporting public services for low- and moderate-income residents including those with special needs and those at risk of homelessness offered by nonprofit organizations

### **Actions planned to develop institutional structure**

The institutional delivery system in Hamilton is high functioning and collaborative, particularly the relationship between local government and the nonprofit sector comprised of a network of capable nonprofit organizations that are delivering a full range of services to residents. Strong Township departments anchor the administration of HUD grant programs and the housing, community and economic development activities that are implemented by the Township support and enhance this existing institutional structure.

The Township will collaborate with nonprofit agencies receiving CDBG funds through the 2025 Annual Action Plan to ensure that the needs of low- and moderate-income residents are met as envisioned within the 2025-2029 Consolidated Plan.

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

The Township will continue to provide referrals and linkages as appropriate while operating all program activities. Ongoing dialogues with local providers and with provider organizations will facilitate this effort.

To enhance coordination between public and private housing and social service agencies, the Township will continue consulting with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in Hamilton, particularly the CDBG Target Areas.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

Hamilton Township has identified all CDBG activities to be undertaken in FY 2025 in the Projects Table, including administrative, public services, improvements to public facilities, housing rehabilitation and slum/blight elimination as well as program administration.

#### 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
---	---

## Appendix - Alternate/Local Data Sources

<b>1</b>	<b>Data Source Name</b> 2019-2023 ACS
	<b>List the name of the organization or individual who originated the data set.</b> U.S. Census Bureau
	<b>Provide a brief summary of the data set.</b> Wide variety of data at the municipal level.
	<b>What was the purpose for developing this data set?</b> To include the most recent and accurate data in the planning process.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Comprehensive at the municipal level.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2019-2023
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.