

HOME-American Rescue Plan Grant Allocation Plan



Hudson County
Division of Housing and Community Development
830 Bergen Avenue
Jersey City, NJ 07306

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HOME-ARP Allocation Plan

Participating Jurisdiction: Hudson County, NJ

Date: 3/9/2023

Introduction

In September 2021, the U.S. Department of Housing and Urban Development announced the allocation of \$9,754,242 to Hudson County, NJ for a new grant called the Home Investment Partnership American Rescue Plan Program (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

To receive funding, the County must develop a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. This plan will be submitted and approved by HUD. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and public engagement. The following is the County's HOME-ARP Allocation Plan.

Consultation

Summarize the consultation process:

The County's consultation process consisted of developing and disseminating a comprehensive online stakeholder survey as well as ongoing coordination between County and stakeholders in order to capture broad assessments of the community needs and areas for ARP allocation. The online survey was open from August 15, 2022, through September 30, 2022. The survey included seven ARP program-specific questions, open ended comments, and housing authority-specific questions for inclusive community needs assessment. The survey received 25 respondents, including those representing homeless services providers, the Continuum of Care (CoC), housing authorities, Fair Housing agencies, affordable housing developers, domestic violence advocacy groups, and others.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Garden State CDC	Homeless Service Provider, Continuum of Care Member	Survey	Greatest housing needs are more affordable units, especially for 30% AMI households and below, TBRA, non-congregate shelter, and supportive services. Supportive service needs include case management, homeless prevention, substance abuse and mental health services, and food.
Weehawken Housing Authority	Fair Housing Organization, Public Housing Authority, Multi-Service Organization	Survey	The most pressing housing needs are 1-bed and 2-bed units for 30% and 50% AMI households.
Secaucus Housing Authority	Public Housing Authority	Survey	The greatest need we see in our very small community is the need for affordable two- and three-bedroom units. Young families have very limited housing options. In addition to more units, TBRA is a high priority need, as well as mental health services, and case management.
Union City Housing Authority	Public Housing Authority	Survey	There are over 500 families on our waiting list. Need more affordable housing and rental assistance, short and medium term. Life skills training and remediation are needed for support services.
The Waterfront Project	Legal Services; Civil Rights	Survey	High need in homeless prevention and counseling supportive services. Rental assistance and NCS both needed. Low inventory for affordable housing throughout. We are having extraordinary difficulty finding new places for families to live because the affordable housing market is non-existent. Although providing non-congregate short term housing would be okay, it doesn't solve the problem. Hence, we'd rather do more low income housing.
Hudson County Housing Resource Center	Homeless Service Provider, Housing Counseling	Survey	Highest priority needs include homeless prevention services, housing search and counseling services, and rent and utility

			assistance. Tenant-based rental assistance is the highest priority. Housing units dedicated to 30% AMI households remain the greatest need in terms of available affordable housing units.
Community Hope - SSVF	Veteran Services Organization, Homeless Service Provider	Survey	All supportive services that are eligible for use of HOME-ARP funds are a great need. Funding for affordable housing units should prioritize 30% and 50% AMI households for units of various sizes. TBRA and non-congregate shelter needs are also high priority.
Church World Service	Multi-Service Organization, Refugee Resettlement	Survey	There are not enough market rate apartments available to meet housing need, especially for immigrants and refugees who are ineligible to work and struggle with stable housing. More affordable housing is needed at all levels, especially for 30% and 50% AMI households and shorter-term rental assistance. Highest priority supportive service needs are rental assistance, education and employment assistance, case management, food, mental health services, and substance abuse services.
North Hudson Community Action Corporation	Homeless Service Provider	Survey	The greatest need for clients is finding childcare, particularly while seeking employment or working overnight and off-hours schedules. Clients need more supportive services that enable them to build long-term skills in addition to rental assistance. Other high priority needs are housing search and counseling services and food.
Catholic Charities of the Archdiocese of Newark	Homeless Service Provider, Veteran Services Organization, Continuum of Care Member, Homeless Shelter Provider, Housing Counseling, Multi-Service Organization	Survey	Affordable housing is in very short supply in Hudson County. Credit scores and income need to be very high to even be considered for obtaining housing. Young adults especially often cannot afford even the application fees. Additionally, undocumented homeless populations need shelter and supportive services, particularly legal services, outreach, case management, and short- and long-term rental assistance.
John Randy Foundation	Community Member	Survey	The biggest challenge is a lack of available resources for homeless populations. We need increased available affordable housing units, especially multi-bedroom units as well as an increase in all supportive services, including outreach, case management, education and

			employment services, mental health services, substance abuse treatment, and TBRA.
Catholic Charities of the Archdiocese of Newark	Homeless Service Provider, Veteran Services Organization, Continuum of Care Member, Homeless Shelter Provider, Housing Counseling, Legal Services, Multi-Service Organization	Survey	Highest priority need is non-congregate shelter and greater availability of affordable housing units for 30% and 50% AMI households in addition to TBRA. Greatest supportive service needs are outreach, employment and legal services, health services, and TBRA.
United Way of Hudson County	Continuum of Care Member	Survey	The greatest challenges we face are a general lack of affordable housing, not enough single-room occupancy units, low number of landlords who are willing to rent to the populations served. Additionally, we see a large gap in supportive mental health services. The biggest supportive services needs that we see are mental health and substance abuse treatment. Other priority needs are TBRA, outreach and homeless services, employment assistance.
Collaborative Support Programs of New Jersey (CSPNJ)	Homeless Service Provider, Disability Services Organization, Fair Housing Organization, Continuum of Care Member, Homeless Shelter Provider, Public Housing Authority, Housing Counseling, Multi-Service Organization, Community Member	Survey	We have seen an increase in the need for low-barrier year-round shelter. We operate a warming center and have seen an extreme increase in need when we close for the season. We have also seen an increase in the need for affordable rental units, especially for 30% LMI individuals. Highest need supportive services include food, substance abuse and mental health services, housing retention efforts, and employment services.
Hoard Housing Urban Renewal Corp., Windmill Alliance Inc.	Disability Services Organization, Fair Housing Organization, Multi-Service Organization	Survey	We see far more families and individuals than we can serve. We see urgent need for expanded affordable housing, including more units dedicated to LMI households, TBRA, and an increase in all supportive services for qualifying populations.

Michaels Management	Affordable Housing	Survey	Highest priority unmet service needs are housing counseling, life skills training, mental health services, and short and long term TBRA. Additionally, there is increased need for additional affordable housing units, particularly for 30% and 50% AMI households and individuals.
Township of North Bergen Housing Authority	Public Housing Authority, Community Member	Survey	Greatest needs include security deposit payments; applicants often do not have sufficient funds to cover a security deposit or may have poor credit which disqualifies them from finding housing. We also see a large lack of available housing in units of all sizes. Highest need supportive services include food assistance, education services, homeless prevention, and housing counseling.
Bayonne Economic Opportunity Foundation	Homeless Service Provider, Domestic Violence Service Provider, Continuum of Care Member, Housing Counseling, Multi-Service Organization, Community Member, Community Action Program	Survey	The greatest need we see is a lack of funding for TBRA, especially for short and medium term assistance. There is also need for increased supply of affordable housing units available to LMI households. Highest priority supportive service needs include outreach and housing counseling, childcare, food services, life skills training, mental health services, transportation, and case management.
Hoboken Shelter	Homeless Service Provider, Domestic Violence Service Provider, Veteran Services Organization, Continuum of Care Member, Homeless Shelter Provider, Housing Counseling, Multi-Service Organization	Survey	One of our greatest challenges is finding apartments in Hudson County that meet HUD's Fair Market Rate (FMR) price-point allowable for Vouchers, finding landlords who are willing to rent to tenants with vouchers, and assisting tenants with keeping up with the paperwork required to keep their vouchers. Greatest housing need continues to be the availability of diverse options for affordable units to meet the needs of the various situations of clients. There is also need for additional TBRA, especially for the lowest income populations. Additional supportive service need priorities are outreach and homeless prevention services, housing counseling, mental health and outpatient health services, and food.
New Jersey HIV Housing	Homeless Service Provider, Housing Counseling	Survey	Highest priority housing needs include TBRA, non-congregate shelter, and increased affordable housing supply for LMI households.

Collaborative (NJHHC)			There is also urgent need for a wide range of supportive services, including outreach, homeless prevention, housing counseling, food support, legal services, life skills training, mental health services, substance abuse treatment, transportation, and case management.
WomenRising	Homeless Service Provider, Domestic Violence Service Provider, Continuum of Care Member, Multi-Service Organization	Survey	Greatest challenges we face are matching funding for services and housing and a lack of available affordable housing units. Highest priority housing needs are long-term TBRA and increase in available units for 30% LMI families who need multiple bedrooms. Highest supportive service needs include homeless prevention, childcare, services, mental and physical health services, and increased case management/housing navigation.
AngelaCARES, Inc.	Multi-Service Organization, Social Services	Survey	Our most urgent needs include increased supportive services, particularly housing search and counseling, legal services, case management, and longer-term TBRA. In terms of affordable housing needs, we see increased need for affordable 1- and 2-bedroom units for LMI households.
The City of Hoboken	Local Government, Fair Housing	Survey	The greatest challenge we face is the lack of inventory of available affordable housing units. There is need for an increase in affordable units of all sizes, particularly for 30% and 50% AMI households. Populations are faced with rising costs of living, minimal wages earned, and rental increases that are not sustainable. Higher need supportive services include homeless prevention, housing counseling, and legal services.
Housing Partnership Development Corporation	Fair Housing / Housing Counseling	Survey	High need for HOME-ARP funds to rehabilitate or construct affordable rental housing. Lower need for NCS.
RPM Development	Affordable Housing Developer	Survey	High need for supportive services, including mental health, substance abuse, life skills, food, etc. need more affordable housing throughout.

General feedback trends:

Nearly all stakeholders that provided feedback noted the general lack of availability of affordable units. Affordable rental housing production was selected as the top priority for uses of HOME-ARP funds by 44% of survey respondents. Stakeholders specifically highlighted the lack of rental units with two or more bedrooms for families. Over 75% of survey respondents agreed that the

highest need for affordable rental housing production is two-bedroom units for 30%-50% AMI households. Other common comments included the numerous barriers that qualifying populations face to get into units such as security deposits, bad credit, income documentation, and challenges identifying affordable units. Nearly 70% of survey respondents stated security deposit assistance is the highest TBRA need, and over half of respondents said there is a high need for short-, medium-, and long-term rental assistance. Stakeholders also described the overwhelming need of additional supportive services. The primary services survey respondents ranked as the highest needs were housing search and counseling, homeless prevention, mental health services, and case management. The need to include substance abuse treatment as well as the benefits of fully integrating case management efforts with housing and crisis intervention support was also highlighted as a best practice.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public Notice: 11/30/2022***
- ***Public comment period: start date - 12/1/2022 end date - 12/16/2022***
- ***Public hearing: 12/14/2022***
- ***Second Public Notice (Correcting allocation amount): 2/21/2023 – 03/08/2023***

Enter narrative response here.

Describe any efforts to broaden public participation:

In addition to the public notice and public comment period, the County also posted the public notice, draft HOME-ARP allocation plan, and presentations on the County's website. A second public comment period was given to correct a minor typo in the allocation total amount.

Summarize the comments and recommendations received through the public participation process:

During the public comment period, Hudson County received more stakeholder feedback as it relates to the importance of partnering and collaborating between crisis intervention, shelter/housing advocates, and supportive services. These insights have been included in updates to various sections of the plan. A separate comment referenced the need for integrating substance abuse treatment as a supportive service (along with case management, mental health, etc.), and while the County is not allocating funding to supportive services, it recognizes the importance of integrating these needs and a streamlined effort. Hudson County will make efforts through its funding of non-profit capacity building to promote and emphasize these needs. There were no significant recommendations received during the public hearing. Comments/questions generally sought clarification on HUD regulations and next steps, as well as County processes for how the HOME-ARP funds will be accessible to subrecipients interested in leveraging funding for services.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments were accepted.

Needs Assessment and Gaps Analysis

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The CoC releases an annual Point-in-Time (PIT) Count that includes valuable data for addressing the needs of residents who are experiencing homelessness. The 2020 Jersey City, Bayonne/Hudson County CoC PIT count data was used to capture the most recent and relevant homeless population data due to alterations in methodology during the 2021 count to mitigate the effects of the COVID-19 pandemic.

According to the 2020 PIT count, Black or African American residents are the largest demographic of people experiencing homelessness. Just over 54% of people experiencing homelessness are Black or African American, 43% are White/Caucasian, and the remainder are American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, Asian, or multi-racial. 21% percent of overall homeless are Hispanic/ Latino. 67% of homeless individuals identify as Male. 84% are over the age of 24 and 3.5% being under the age of 18, mostly in households with other adults. About 33% were reported as chronically homeless. 281 individuals reported having a mental illness, 257 reported having a substance use disorder, 27 are veterans, 32 are unaccompanied youth (18-24), and 28 are victims of domestic violence.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units						# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	123	45	216	216	0								
Transitional Housing	19	8	26	26	0								
Other Permanent Housing						--	--	--	--				
Sheltered Homeless						58	466	19	19				
Unsheltered Homeless						0	292	8	9				
Current Gap										--	-5	-516	-516

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Populations At-risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability. Using HUD's 2014-2018 CHAS data, the county has 44,065 households with incomes at or below 30% AMI, (over 17% of all county households). Nearly 90% of these households are renter households. Households at-risk of homelessness include an estimated 53,195 households who are severely cost burdened, paying over 50% of their income toward housing and 52,600 who are cost burdened (above 30%, less than 50%).

Additionally, according to ACS data estimates, there are approximately 78,000 rental households who are cost burdened. In Hudson County, extremely low-income households can afford approximately \$900 in rent per month in order to avoid being cost burdened. In the County approximately 39,000 rental units are affordable to extremely low-income households. That creates a need for at least 5,000 additional units for extremely low-income households.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to the National Coalition Against Domestic Violence 35.8% of women and 27.4% of men in New Jersey experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner stalking in their lifetimes. Statistics from the New Jersey State Police document that there was a total of 2,656 domestic violence incidences reported in Hudson County during 2019. The National Network to End Domestic Violence (NNEDV) reported that 819 adult and child victims of domestic violence received residential services and an additional 822 victims received non-residential services in New Jersey during the one-day Domestic Violence Count in 2021. Additionally, data collected by the New Jersey Coalition to End Domestic Violence (NJCEDV) for 2021 found that 53% more victims received shelter in the state than in 2020.

The National Human Trafficking Hotline received 146 reports of Human Trafficking cases in New Jersey in 2020. Of the victims with demographic information reported, 84% were female and 60% were adults.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

There is a large overlap between those at-risk of homelessness (above data) and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Lack of affordability is the primary issue highlighted in data and consultation. According to CHAS, of the severely cost burdened, 24,620 are renting households who are also in the extremely low-income range ($\leq 30\%$) and considered at greatest risk of housing instability.

Additionally, according to ACS data, 30% (24,417 households) of cost burdened renters earned less than \$20,000 between 2016-2020, while only approximately 12,574 rental units offer a gross

rent price within the needed range to prevent being cost burdened. In other words, there is a lack of nearly 12,000 affordable rental units for households making under \$20,000 a year.

While we don't have data that matches the exact definition of QP #4, we can glean general demographics and need from looking at the County's poverty levels. Poverty is often a direct correlation as it relates to households requiring housing assistance to prevent homelessness or to those being at-risk of housing instability. According to ACS, there are 111,289 (16% of County) residents below the poverty level, of which 30% are under 18 years old. Of those living under the poverty level, an estimated 24,778 are White, 17,697 are Black or African American, 9,950 are Asian, 7,047 are mixed race, and 63,810 are of Latino origin. There are more females (61,893) under the poverty level than males (49,396). Using ACS and USDA data, the US Census Bureau estimated that 31.5% of County residents were eligible for the Supplemental Nutrition Assistance Program (SNAP). Households with an income less than 185% of the poverty level are eligible for SNAP benefits. In New Jersey, 185% of the poverty level for a household of 1 is an annual salary of \$25,152.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The primary unmet need as it pertains to homeless needs inventory is the availability of beds and units for adults who are experiencing homelessness. There is a need for over 500 beds in order to provide housing services for all unsheltered adults identified in the PIT Count. Additionally, beds specifically for people with mental illnesses and critical health issues were recognized as a specific need. There is also a lack of shelter and transitional beds dedicated for homeless Veterans.

Challenges of a lack of affordable housing, supportive services, and a need for TBRA were a common unmet need themes highlighted from the stakeholder's forum. Service needs for both sheltered and unsheltered include a greater capacity to offer healthcare services, mental healthcare and substance abuse treatment, as well as housing counseling, financial workshops, job training, and skills training. Stakeholder feedback also highlighted the need for case management and assistance navigating the homeless services system. The 2020 Hudson County Needs Assessment completed by The New Jersey Department of Children and Families reported that the biggest barriers to housing assistance are waitlists and lack of awareness of services.

Populations At-risk of Homelessness as defined in 24 CFR 91.5

ACS estimates approximately 45% of the County's renters are costs burdened (paying over 30% of income to housing costs), or approximately 78,000 total renter households. Lack of affordable housing inventory and a persistent affordability gap challenge both populations recovering from homelessness and those households at risk of homelessness or housing instability. In addition to the general lack of affordable housing, the County has a lack of larger rental units. According to ACS data, approximately 77% of the units in the County have two bedrooms or less. The lack of larger rental units leads to large families living in overcrowded and unstable housing conditions.

Those at-risk of homeless or housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts.

Supportive services such as housing or financial counseling, landlord mediation for eviction proceedings will also benefit these groups. Survey respondents that participated in the 2020 Hudson County Needs Assessment identified landlord acceptance and credit checks as significant barriers to finding stable housing. Healthcare assistance greatly benefits those at-risk of housing instability who are also disabled or elderly. The survey respondents also identified a lack of affordable housing that is physically accessible.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

As reported in the County's 2020-2024 Consolidated Plan, In 2019, Hudson County served 543 households in emergency shelter, transitional housing or coordinated entry, who reported experiencing domestic violence, representing 16% of all clients served. During the same time frame only 76 households served in rapid rehousing or permanent supportive housing programs reported experiencing domestic violence, showing a major need for additional housing and services that focus on victims of domestic violence. According to the 16th Annual (2022) Domestic Violence Counts Report for New Jersey conducted by the National Network to End Domestic Violence victims of domestic violence made 53 requests for shelter, housing, and other supportive services that providers could not provide. With approximately 70% of these unmet requests being for housing and emergency shelter. Victims of domestic violence were also highlighted as QPs needing particular support. Stakeholders highlighted consistent feedback that current DV beds are not sufficient, and traditional shelter does not meet the needs of this population. Domestic violence and human trafficking survivors often lack easy access to short-term shelter and quick access to medical and psychological services. They need specialized housing security, healthcare, and counseling services (to included networking and economic independence). Case management and financial assistance were highlighted as specific needs for this category.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The unmet needs for the populations needing assistance to prevent homelessness or at risk of greater housing instability mirror those from above, including rental payment assistance or utility deposit assistance and development of affordable rental housing units. Those requiring housing assistance to prevent homelessness or those at greatest risk of housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts. In a survey completed for the 2020 Hudson County Needs Assessment, 67% respondents disagreed or strongly disagreed that there are enough services available in the county to help those who have housing needs. At the time this plan was written, all Housing Choice Voucher programs in the County were full. Only three of the ten Housing Authorities in the County were accepting

applications for the Housing Choice Voucher Program, and the open application was only offering placement on a waitlist. The average waitlist length is over 300 households with a wait time of over two years.

Further, housing counseling, mental health services, and homeless prevention were highlighted during our consultation as service needs for those at greatest risk of housing insecurity. Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time. Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. Stakeholder feedback also highlighted the need for continued, long-term case management and supportive services after financial assistance is completed.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

The **Hudson County Alliance to End Homelessness (HCAEH)** is the Continuum of Care for Hudson County. Member organizations provide coordination of care, housing, and supportive services across the county. HUD's 2019 HIC reports indicated that the county has 339 emergency shelter beds, 45 transitional housing beds, and more than 500 permanent supportive housing beds.

Hudson County is home to ten **Housing Authorities (HAs)**: Guttenberg Housing Authority, Harrison Housing Authority, Secaucus Housing Authority, Weehawken Housing Authority, West New York Housing Authority, Bayonne Housing Authority, Hoboken Housing Authority, Union City Housing Authority, North Bergen Housing Authority and Jersey City Housing Authority. These HAs provide public rental housing, rental assistance, and housing support for low-income persons and families in Hudson County.

Catholic Community Services Archdiocese of Newark (CCSAN) oversees the operation of eight shelters and homeless services organizations. Canaan House operates 12 units of Permanent Supportive Housing (PSH) for homeless persons living with HIV/AIDS. Franciska Residence is a 24-month transitional housing facility for men with HIV/AIDS and houses up to 14 men. Good Shepherd has 5 units of PSH for persons with HIV/AIDS. Hope House is an emergency shelter for families that can serve up to 20 mothers and their children. St. Bridget's Residence is an 18-month transitional housing facility that houses up to 30 men with HIV/AIDS. St. Jude's Oasis provides PSH for up to five homeless families with children under the age of 18. St. Lucy's Emergency Shelter contains a total of 125 emergency shelter beds for homeless individuals in addition to providing supportive services for clients. St. Rocco's Emergency Family Shelter provides emergency shelter and supportive services for up to 15 families.

Garden State Community Development Corporation (GSCDC) provides supportive housing and social services to individuals who are living with or at risk of HIV/AIDS, under-housed, homeless, substance using and/or mentally ill in Hudson County. They oversee multiple shelters and housing

programs. Corpus Christi Ministries Housing provides 36 units of PSH for individuals and families with HIV/AIDS. They manage about 100 additional PSH units at various other facilities. GSCDC also runs the Hudson Creating Alliances to Shelter All (CASA) program which provides coordinated entry, case management, and supportive services to individuals experiencing homelessness. GSCDC also runs a Rapid-Rehousing program that can serve up to 17 individuals and 30 families.

Communities of Faith for Housing provides 50 year-round emergency shelter beds and 5 overflow emergency shelter beds in addition to daily meals, hygiene services, and 22 units of PSH for homeless individuals.

Covenant House provides shelter and supportive services to young adults between the ages of 18 and 21 to prevent homelessness and human trafficking. They operate three units of PSH in addition to providing supportive services for young adults.

Palisades Emergency Residence Corporation (PERC) provides 61 emergency shelter beds year round as well as 80 overflow shelter beds. PERC also operates a day shelter program which includes housing case management services, soup kitchen and food pantry, and other supportive services for homeless individuals.

Urban Renewal Corporation provides a variety of supportive services and operates 100 seasonal emergency shelter beds in Kearney, NJ.

Women Rising, Inc. manages four emergency shelter units with a total of nine shelter beds for women and families fleeing situations of domestic violence and abuse. They also manage 20 PSH units which include 44 beds and offer supportive counseling, crisis intervention, workforce development and job placement, outreach, advocacy, and more supportive services.

United Way of Hudson County manages 10 units of PSH and collaborates with other organizations listed here to provide wraparound services for individuals at risk of or experiencing homelessness.

Hoboken Shelter provides hundreds of meals, 35 emergency shelter beds, case management services, vocational and educational skills and training, connections to PSH and other forms of housing support.

York Street Project operates 43 Emergency Shelter beds, 16 hybrid transitional housing units, and 95 Rapid Re-Housing units, primarily for women and children. They also manage an early childhood development center to provide childcare and supportive services for mothers.

Family Promise of Hudson County manages 11 emergency shelter beds and a Rapid-Rehousing program in addition to homelessness prevention programming and supportive services for individuals and families that need assistance.

Hudson County's **Frequent User Initiative (FUSE)**, also known as Familiar Faces, works to assist hospitals and other public institutions with connecting chronically homeless persons to community resources and supportive housing solutions and lessen the repeat uses of those mainstream services

Community Health Law Project, Northeast NJ Legal Services, and The Waterfront Project all provide legal and advocacy services for individuals that need legal assistance with housing issues.

Bridgeway Crisis Intervention Services provides emergency mental health services and crisis stabilization for all individuals, including people who do not have health insurance.

Jersey City Medical Center operates Medical and Social Services for the Homeless (MASSH). Through MASSH, they provide physical and mental healthcare and supportive services for people experiencing homelessness.

Metropolitan Family Health Network provides preventative health and mental health care services to individuals experiencing homelessness.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

As noted above, the primary gap in the shelter and housing inventory is the availability of beds for adult only households. There are only approximately 242 emergency shelter and transitional housing beds available and over 758 homeless adults in need of a bed. There remains a high need for case management, emergency shelter, and supportive services for all homeless persons and households.

The availability of housing units does not meet the needs of the qualifying population. There is a need for quality affordable housing units of multiple sizes in neighborhoods throughout the County, especially for extremely low-income households who are most at-risk of eviction and homelessness. The lack of affordability leads to overcrowding and cost burden, which not only affect LMI households, but even those households above the 80% AMI threshold. There is a need for immediate rental assistance to help those most at-risk of homelessness and/or housing instability, as well as supportive services such as housing counseling and legal services to prevent homelessness.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

Hudson County recognizes the definition of Other Populations set forth by HUD in the CPD Notice (Families Requiring Services or Housing Assistance to Prevent Homelessness or At Greatest Risk of Housing Instability). The criteria related to these categories include households/persons who are (1) extremely low-income with a severe cost burden, or households with (2) an annual income that is less than or equal to 50% of the area median income meet one of the following conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5. No

further characteristics of housing instability have been defined in the County's ConPlan; thus the County will use the criteria listed in first six conditions listed in the "At risk of homelessness" definition established at 24 CFR 91.5.

Identify priority needs for qualifying populations:

The analysis above and consultation with key stakeholders have identified the following priority needs:

1. Lack of Affordable Rental Housing
2. Emergency Shelters, to include NCS
3. Supportive Services (McKinney-Vento Supportive Services, Housing Counseling)
4. Rental assistance / affordability assistance

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

To determine the level of need and gaps the County looked at both qualitative and quantitative measures. Data from the US Census and CHAS data were used in partnership with feedback and on-the-ground insights from key stakeholders in the area. The CoC highlighted the urgent need for non-congregate shelter with medical supportive services, as well as housing counseling. It was also noted from multiple stakeholders that there is Insufficient investment in construction and renovation of permanent units for low-income households. There is a significant need for greater supportive services to high-need, vulnerable low-income families that would help these QPs maintain their housing. The takeaways from data analysis and stakeholder input were incorporated into the needs assessment.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The County expects to administer programs directly. Once the County has received the full HOME-ARP grant award from HUD, the County will conduct a Request for Proposals for a specified period of time to make it a more competitive process in awarding these funds. During that time any organization, developer, subrecipient, or Community Housing Development Organization (CHDO) is eligible to apply. At the close of the application period, all applications received will be reviewed for completeness, eligibility, and their ability to deliver on the priority needs identified within this plan. Each applicant will also be reviewed for their ability to carry out the project meeting all eligibility criteria.

Award(s) will be made based on the applicant's project scope as it pertains to the outlined priority needs in this plan as well as the applicant's familiarity with utilizing federal funding and ability to comply with all federal and local requirements.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The County will administer the program. The County has not yet used HOME-ARP administrative funds.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters	\$3,499,818		
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$3,815,818		
Non-Profit Operating	\$487,721	5%	5%
Non-Profit Capacity Building	\$487,721	5%	5%
Administration and Planning	\$1,463,164	15 %	15%
Total HOME ARP Allocation	\$9,754,242		

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Hudson County estimates 20 new affordable rental units will be produced using HOME-ARP funds. An estimated 18 new NCS units are expected via the funding allocation toward non-congregate shelter.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

The primary goal will be to help address the lack of affordable housing in Hudson County and to assist QPs in need of emergency shelter with increased available shelter access via NCS development. Hudson County surmises that adding affordable rental units to the housing stock through the HOME-ARP allocation will contribute to the overall goal of reducing homelessness and housing instability for the most vulnerable populations.

The HOME-ARP grant provides an opportunity to assist households with temporary supportive housing through the acquisition and development of non-congregate shelters. These shelters will not only help those experiencing homelessness, but they will also assist families or individuals who fleeing, or attempting to flee, domestic violence and sexual assault. Funding toward NCS acquisition and development will benefit the community needs and is viewed as a long-term development solution. Emergency shelter and interim housing help strengthen the crisis response system.

Stakeholder input suggest firsthand observation in the number of crises that can be averted by the availability of an increased capacity in the emergency shelter and interim housing pool of beds. NCS development/acquisition, combined with making funds available for non-profit capacity building and operating, will provide better support to help QPs with emergent needs. The County will explore avenues to increase partnering opportunities between treatment providers and housing providers, at least as it relates to crisis response

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The County will not provide preferences to any population or subpopulation

HOME-ARP Refinancing Guidelines

The County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

HOME-ARP Supporting Documents

HOME ARP Grant Agreement

Title II of the Cranston-Gonzalez National Affordable Housing Act

Assistance Listings #14.239 – HOME Investment Partnerships Program

1. Grantee Name and Address County of Hudson 585 Newark Avenue Jersey City, NJ 07306-0000		2. Grant Number (Federal Award Identification Number (FAIN)) M21-DP340220	
		3a. Tax Identification Number 226002443	3b. Unique Entity Identifier (formerly DUNS) 141045844
		4. Appropriation Number 861/50205	5. Budget Period Start and End Date FY 2021 – 09/30/2030
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0
a. Formula Funds			\$
7. Current Transaction (+ or -)			\$9,754,242.00
a. Administrative and Planning Funds Available on Federal Award Date			\$487,712.10
b. Balance of Administrative and Planning Funds			\$975,424.20
c. Balance of Formula Funds			\$8,291,105.70
8. Revised Obligation			\$
a. Formula Funds			\$
9. Special Conditions (check applicable box) <input type="checkbox"/> Not applicable <input type="checkbox"/> Attached		10. Federal Award Date (HUD Official's Signature Date) 09/20/2021	
11. Indirect Cost Rate*		12. Period of Performance Date in Box #10 - 09/30/2030	
Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base	
—	—%		
—	—%		
—	—%		
—	—%		

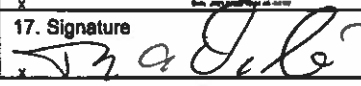
* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients.

The HOME-ARP Grant Agreement (the "Agreement") between the Department of Housing and Urban Development (HUD) and the Grantee is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan (P.L. 117-2) (ARP). HUD regulations at 24 CFR part 92 (as may be amended from time to time), the CPD Notice entitled "Requirements for the Use of Funds in the HOME-American Rescue Plan Program" (HOME-ARP Implementation Notice), the Grantee's HOME-ARP allocation plan (as of the date of HUD's approval), and this HOME-ARP Grant Agreement, form HUD-40093a, including any special conditions (in accordance with 2 CFR 200.208), constitute part of this Agreement. HUD's payment of funds under this Agreement is subject to the Grantee's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502 and the HOME-ARP Implementation Notice. To the extent authorized by HUD regulations at 24 CFR part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Grantee without the Grantee's execution of the amendment or other consent. The Grantee agrees that funds invested in HOME-ARP activities under the HOME-ARP Implementation Notice are repayable in accordance with the requirements of the HOME-ARP Implementation Notice. The Grantee agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58, as well as the HOME-ARP Implementation Notice.

The Grantee must comply with the applicable requirements at 2 CFR part 200, as amended, that are incorporated by the program regulations and the HOME-ARP Implementation Notice, as may be amended from time to time. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in the program regulations or HOME-ARP Implementation Notice, activities carried out under the grant after the effective date of the 2 CFR part 200 amendments will be governed by the 2 CFR part 200 requirements, as replaced or renumbered by the part 200 amendments.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix I to 2 CFR part 200, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

Funds remaining in the grantee's Treasury account after the end of the budget period will be cancelled and thereafter not available for obligation or expenditure for any purpose. Per 31 U.S.C. 1552, the Grantee shall not incur any obligations to be paid with such assistance after the end of the Budget Period.

13. For the U.S. Department of HUD (Name and Title of Authorized Official) Annemarie C. Uebbing, CPD Director	14. Signature Annemarie Uebbing	15. Date 09/22/2021
16. For the Grantee (Name and Title of Authorized Official) Thomas A. DeGise, County Executive	17. Signature 	18. Date 1/27/2023

19. Check one: ☒ Initial Agreement ☐ Amendment #

20. Funding Information: **HOME ARP**
Source of Funds Appropriation Code PAS Code Amount
 2021 861/50205 HMX \$9,754,242.00

21. Additional Requirements: These additional requirements are attached and incorporated into this Agreement. The Grantee agrees to these additional requirements on the use of the funds in 7., as may be amended from time to time by the Secretary.

- a) As of the Federal Award Date, the Grantee may use up to the amount identified in 7.a. of this Agreement for eligible administrative and planning costs in accordance with the HOME-ARP Implementation Notice.
- b) Until the date of HUD's acceptance of the Grantee's HOME-ARP allocation plan, the Grantee agrees that it will not obligate or expend any funds for non-administrative and planning costs, in accordance with the HOME-ARP Implementation Notice.
- c) In accordance with the HOME-ARP Implementation Notice, as of the date of acceptance by HUD of the Grantee's HOME-ARP allocation plan, HUD shall make the amount identified in line 7. of this Agreement available to the Grantee.
- d) If the Grantee does not submit a HOME-ARP allocation plan or if the Grantee's HOME-ARP allocation plan is not accepted within a reasonable period of time, as determined by HUD, the Grantee agrees that all costs incurred and HOME-ARP funds expended by the Grantee will be ineligible costs and will be repaid with non-Federal funds.

22. Special Conditions

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

9/20/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

22-6002443

5b. Federal Award Identifier:

M-21-DP-34-0220

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Hudson County, New Jersey

* b. Employer/Taxpayer Identification Number (EIN/TIN):

22-6002443

* c. Organizational DUNS:

1410458440000

d. Address:

* Street1:

830 Bergen Avenue, Suite 5B

Street2:

* City:

Jersey City

County/Parish:

Hudson

* State:

NJ: New Jersey

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

07306-4507

e. Organizational Unit:

Department Name:

Housing and Community

Division Name:

Housing and Community Dev.

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

George

Middle Name:

* Last Name:

Serio

Suffix:

Title: Division Chief

Organizational Affiliation:

* Telephone Number: 201-369-4520 x2796

Fax Number:

* Email: GSerio@hcnj.us

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Housing and Community Reintegration

* 12. Funding Opportunity Number:

14.239

* Title:

HOME Investment Partnership Program American Rescue Plan (HOME-ARP)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Hudson County HOME-ARP Allocation Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="9,754,242.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="9,754,242.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

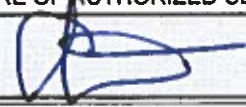
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <u>Abraham Antun</u> County Administrator
APPLICANT ORGANIZATION Hudson County, NJ	DATE SUBMITTED <u>1-6-2023</u>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.


NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL



TITLE

Abraham Antun

County Administrator

APPLICANT ORGANIZATION

Hudson County, NJ

DATE SUBMITTED

1-6-2023

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

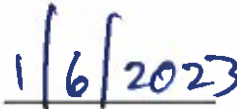
HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

Abraham Antun
Hudson County Administrator

Title



Date

**PUBLIC NOTICE
PUBLIC COMMENT PERIOD & PUBLIC HEARING
HUDSON COUNTY**

NOTICE IS GIVEN that a draft of HOME-American Rescue Plan (HOME-ARP) Allocation Plan for Hudson County has also been completed and will be available for a 15-day public review period.

The County was awarded \$9,754,242 in HOME-ARP funds in a one-time allocation from HUD. The Allocation Plan is required by HUD for the County to receive federal HOME-ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist qualifying populations who are experiencing homelessness, at-risk of homelessness, and other vulnerable populations by providing affordable rental housing, tenant-based rental assistance, supportive services, and non-congregate shelter in order to reduce homelessness and increase housing stability. The Allocation Plan defines the use of federal HOME-ARP grant funds to address these needs.

PUBLIC COMMENT PERIOD: Citizens are invited to review and make comments on the draft HOME-ARP Allocation Plan. The draft HOME-ARP Allocation Plan will be available for (15) fifteen days beginning December 1, 2022 to December 16, 2022, and comments concerning the draft HOME-ARP Allocation Plan must be received by December 17, 2022. The HOME-ARP Allocation Plan can be viewed at Hudson County Division of housing and Community Development, 830 Bergen Ave., Fl. 5A Jersey City, NJ 07306 from Monday to Friday at regular business hours between 8:30am and 4:00pm and can also be downloaded and viewed from the County website at: <https://www.hcnj.us/housing-and-community-reintegration/housing-and-community-development/>.

Comments may be returned by mail at the address above or by email to: gserio@hcnj.us.

PUBLIC HEARING: A virtual public hearing will be held at the following weblink: <https://us02web.zoom.us/j/84461212693> on December 14, 2022 at 4:00PM to review the HOME-ARP Allocation Plan and receive public comment. For more information on how to participate at the public hearing please email gserio@hcnj.us, or call 201-369-4520.

Accessibility: Hudson County does not discriminate on the basis of age, color, religion, sex, national origin, familial status or disability in the admission or access to, or treatment or employment in its federally assisted programs or activities. Assistance will be provided to accommodate the special needs of disabled persons Translation Assistance: The County of Hudson will make efforts to provide translation assistance for public program information. Please contact the Housing & Community Development office at least 48 hours in advance if translation assistance is needed for the viewing the draft HOME-ARP Allocation Plan. To request assistance please contact: call 201-369-4520.

Jersey Journal, Jersey City

Publication Name:

Jersey Journal, Jersey City

Publication URL:

Publication City and State:

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Wednesday, November 30, 2022

Notice Content

PUBLIC NOTICE PUBLIC COMMENT PERIOD & PUBLIC HEARING HUDSON COUNTY HOME-AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN NOTICE IS GIVEN that a draft of HOME-American Rescue Plan (HOME-ARP) Allocation Plan for Hudson County has also been completed and will be available for a 15-day public review period. The County was awarded \$9,754,424 in HOME-ARP funds in a one-time allocation from HUD. The Allocation Plan is required by HUD for the County to receive federal HOME-ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist qualifying populations who are experiencing homelessness, at-risk of homelessness, and other vulnerable populations by providing affordable rental housing, tenant-based rental assistance, supportive services, and non-congregate shelter in order to reduce homelessness and increase housing stability. The Allocation Plan defines the use of federal HOME-ARP grant funds to address these needs. PUBLIC COMMENT PERIOD: Citizens are invited to review and make comments on the draft HOME-ARP Allocation Plan. The draft HOME-ARP Allocation Plan will be available for (15) fifteen days beginning December 1, 2022 to December 16, 2022, and comments concerning the draft HOME-ARP Allocation Plan must be received by December 17, 2022. The HOME-ARP Allocation Plan can be viewed at Hudson County Division of housing and Community Development, 830 Bergen Ave., Fl. 5A Jersey City, NJ 07306 from Monday to Friday at regular business hours between 8:30am and 4:00pm and can also be downloaded and viewed from the County website at: <https://www.hcnj.us/housing-and-community-reintegration/housing-andcommunity-development/>. Comments may be returned by mail at the address above or by email to: gserio@hcnj.us PUBLIC HEARING: A virtual public hearing will be held at the following weblink: https://us02web.zoom.us/join/join?secret=72wrcu6qqDoqHNTzCFS4uj3NP3t_OYll1c1 on December 14, 2022 at 4:00PM to review the HOME-ARP Allocation Plan and receive public comment. For more information on how to participate at the public hearing please email gserio@hcnj.us, or call 201-369-4520. Accessibility: Hudson County does not discriminate on the basis of age, color, religion, sex, national origin, familial status or disability in the admission or access to, or treatment or employment in its federally assisted programs or activities. Assistance will be provided to accommodate the special needs of disabled persons. Translation Assistance: The County of Hudson will make efforts to provide translation assistance for public program information. Please contact the Housing & Community Development office at least 48 hours in advance if translation assistance is needed for the viewing the draft HOME-ARP Allocation Plan. To request assistance please contact: call 201-369-4520. 11/30/22 \$87.60

[Back](#)

From: [Asha Bailey](#)
To: [Heather Hanks](#)
Subject: HOME-ARP Comment Period & Public Hearing
Date: Wednesday, November 30, 2022 9:17:59 AM

***** CAUTION: This email originated from outside the County of Hudson *****

Dear Citizens,

The Hudson County Consortium was awarded \$9,754,242 in HOME-ARP funding through the U.S. Department of Housing and Urban Development (HUD) as part of the American Rescue Plan Act for the purpose of providing assistance to Qualifying Populations which include individuals or households that are homeless, at risk of homelessness, and other vulnerable populations to reduce homelessness and increase housing stability.

You are invited to review and make comments on the draft HOME-ARP Allocation Plan which will be accessible on our website for (15) fifteen days beginning December 1, 2022 to December 16, 2022 <https://www.hcnj.us/housing-and-community-reintegration/housing-and-community-development/>.

Additionally, a virtual public hearing will be held on December 14, 2022 at 4:00PM to review the HOME-ARP Allocation Plan and receive public comment. Access virtual hearing at the following weblink
weblink; https://us02web.zoom.us/meeting/register/tZwrcu6qqDoqHNTzCFS4uj3NP3t_O-Yll1c1

Your feedback is critical in assisting the Hudson County Consortium to create a meaningful allocation plan for approval by HUD to best address the needs of our most vulnerable populations with HOME-ARP funds.

HOME-ARP Survey Reminder

The Hudson County Consortium was awarded \$9,754,242 in HOME-ARP funding through the U.S. Department of Housing and Urban Development (HUD) as part of the American Rescue Plan Act for the purpose of providing assistance to Qualifying Populations which include individuals or households that are homeless, at risk of homelessness, and other vulnerable populations to reduce homelessness and increase housing stability.

In order to access HOME-ARP funds, the Hudson County Consortium must consult with

agencies and service providers whose clientele include the HOME-ARP Qualifying Populations to identify unmet needs and gaps in housing or service delivery systems. You are receiving this survey invitation as your organization has been identified as a service, shelter, or housing provider to one or more of the identified Qualifying Populations.

Your feedback is critical in assisting the Hudson County Consortium to create a meaningful allocation plan for approval by HUD to best address the needs of our most vulnerable populations with HOME-ARP funds. **Please kindly complete the Hudson County HOME-ARP Stakeholder Survey by September 10, 2022.** Once the survey results have been compiled a virtual public hearing will be held to discuss the survey result and proposed allocation plan.

Survey Link: <https://www.surveymonkey.com/r/Hudson-ARP>

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Notice Content

PUBLIC NOTICE PUBLIC COMMENT PERIOD HUDSON COUNTY HOME-AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN NOTICE IS GIVEN that a draft of HOME-American Rescue Plan (HOME ARP) Allocation Plan for Hudson County has also been completed and will be available for a 15-day public review period. The County was awarded \$9,754,242 in HOME-ARP funds in a one-time allocation from HUD. The Allocation Plan is required by HUD for the County to receive federal HOME ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist qualifying populations who are experiencing homelessness, at-risk of homelessness, and other vulnerable populations by providing affordable rental housing, tenant-based rental assistance, supportive services, and non-congregate shelter in order to reduce homelessness and increase housing stability. The Allocation Plan defines the use of federal HOME-ARP grant funds to address these needs. PUBLIC COMMENT PERIOD; Citizens are invited to review and make comments on the draft HOME-ARP Allocation Plan. The draft HOME-ARP Allocation Plan will be available for (15) fifteen days beginning February 21, 2023 to March 8, 2023, and comments concerning the draft HOME-ARP Allocation Plan must be received by March 9, 2023. The HOME-ARP Allocation Plan can be viewed at Hudson County Division of housing and Community Development, 830 Bergen Ave., Fl. 5A Jersey City, NJ 07306 from Monday to Friday at regular business hours between 8:30am and 4:00pm and can also be downloaded and viewed from the County website at: <https://www.hcnj.us/housing-and-community-reintegration/housing-and-community-development/>. Comments may be returned by mail at the address above or by email to: gserlo@hcnj.us. 02/21/23 \$78.10

**PUBLIC NOTICE
PUBLIC COMMENT PERIOD
HUDSON COUNTY
HOME-AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN**

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BECKY PHILLIPS
Cardinal Joseph W. Tobin, C.S.B., the archbishop of Newark, will impose ashes at two Masses on Ash Wednesday at St. Patrick's Pro-Cathedral in Newark. One will be celebrated in Spanish. Ash Wednesday marks the beginning of the Lenten season.

Cardinal Tobin will impose ashes at two liturgies Wednesday

By Kevin A. Cavassa Jr.
kac@theobserver.com

Newark Archbishop Cardinal Joseph W. Tobin, C.S.B., will celebrate two Ash Wednesday Masses — one in English and one in Spanish — at 7:30 p.m. and 8:30 p.m. at St. Patrick's Pro-Cathedral in Newark.

Ash Wednesday is one of the most significant holy days of the Catholic liturgical calendar. It marks the beginning of a six-week period of prayer, penitence and sacrifice leading up to Easter. During an Ash Wednesday Mass, priests traditionally place ashes on the foreheads of the faithful as a reminder of their mortality and the prior year's Palm Sunday — onto a parishioner's forehead in the sign of the cross.

to symbolize that God made everyone out of dust, and all shall return to dust at the end of their lives.

Catholics then wear the ashes for the rest of the day as a sign of penance for their sins.

Following Mass, Catholics are expected to spend Ash Wednesday fasting, repenting and abstaining from meat.

Then, over the next several weeks, Catholics will commemorate Christ's 40 days of temptation by praying, repenting, abstaining from meat on Fridays, fasting on Good Friday and making a Lenten sacrifice, which may include giving something to charity or volunteering. They find particular meaning in the ability for the entirety of Lent. This period ends Holy Thursday, which falls on April 6 this year.

NEWS BRIEFS

Knights breakfast will benefit North Arlington CERT team
The Knights of Columbus of North Arlington will be attending to consider donating food items to the CERT team for North Arlington CERT on Sunday, March 5, at Columbus Club Hall, 194 River Road, North Arlington, from 10 to 11 a.m.

The menu includes procedures, scrambled eggs, bacon, sausage, potatoes, bagels, cereal, oatmeal, fruit cups and refreshments. Tickets are \$20 for adults and \$10 for kids and seniors. Reservations are required and may be cash only at the door.

Lyndhurst Scouts hosting Pancake Breakfast
Lyndhurst Scouts Pack 466 will be hosting a pancake breakfast Sunday, Feb. 26, from 8 a.m. to 1 p.m. at the Lyndhurst Senior Center, 250 Cleveland Ave. Tickets are available for \$8 cash only at the door.



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PUBLIC NOTICE PUBLIC COMMENT PERIOD HUDSON COUNTY HOME-AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN

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