**Comments regarding housing and community development needs which must be addressed by 2015 NJ/DCA Five-Year Consolidated Plan**

Submitted by Anti-Poverty Network of New Jersey and the New Jersey Coalition to End Homelessness, March 13, 2015

These comments are submitted by two statewide advocacy organizations: the Anti-Poverty Network of New Jersey and the New Jersey Coalition to End Homelessness. The mission of the Anti-Poverty Network is to prevent, reduce, and end poverty in New Jersey and its members consist of non-profit and community organizations, faith-based communities, labor unions, government partners, concerned individuals, and people with lived experience of poverty. The mission of the New Jersey Coalition to End Homelessness is stated in its name: to end homelessness. The Coalition’s members include shelter providers, social service agencies, housing organizations and individual advocates.

**Introduction:** Only when people have safe, affordable and decent places to live can New Jersey have a productive and stable future. There is a growing body of research showing a direct link between "housing security" and physical/mental health, depression, behavioral and school problems among children, etc., and the ultimate costs of these problems to society. However, remaining in one’s home in New Jersey can be an ongoing challenge due to the increasingly high cost of housing. With nearly a quarter of the state’s renters paying over 50% of their income to housing, it should come as no surprise that many families often have to make difficult choices between rent, food, medicine, and other essentials.

Homelessness in New Jersey is substantial and growing. According to the 2014 Point in Time Count of homeless individuals, on the single night of January 28, 2014, there were 13,900 New Jersey citizens who were homeless, an increase of 15.8% over the number in January 2013. A number of factors combine to make finding affordable rentals particularly difficult for those with extremely low incomes, defined as individuals whose income is less than 30 percent of the area median:

* New Jersey’s high rate of unemployment,
* The high cost of housing across the state,
* The state’s general lack of housing that is set-aside to be affordable for low-income households,
* Entrenched patterns of racial and economic segregation
* The destruction of substantial amounts of affordable housing due to Hurricane Sandy.

Below are six of the most severe areas of need which should be addressed by the 2015 Consolidated Plan.

**1.Preservation of existing affordable housing and foreclosure intervention:**

Given the demonstrable shortage of homes that are affordable to a substantial share of New Jersey’s population, the state must make every effort to preserve the limited housing that is currently affordable. There are 23,000 at-risk subsidized units in New Jersey. Reduced HUD funding has also put some of our current public housing stock at risk. The Consolidated Plan must include practical measures to ensure that these units are protected.

In the same vein, New Jersey’s foreclosure crisis is also draining the state’s housing resources. New Jersey has the highest concentration of homes in the foreclosure process of any state in the nation. A foreclosed home degrades neighborhoods by making the surrounding homes worth less and if it stays abandoned can be a place for crime, a fire etc. We need to both stop the tide of foreclosures and turn already unoccupied homes into homes that can be a housing resource for New Jersey. The Consolidated Plan should include strategic planning for state options to intervene in the flood of foreclosures and recapture already vacant homes to boost affordable housing resources.

**2. Affordable new rental construction, especially for the lowest-income households.**

High rental costs due to shortages of units combined with low wages create “severe housing cost burden” that is a significant cause of homelessness. According to a recent study by the National Alliance to End Homelessness, between 2011 and 2012 severe host cost burden increased in New Jersey almost 10%, from 143,520 to 157,401 households, even though it decreased in 25 other states.[[1]](#footnote-1)

Extremely low income households are particularly affected by the shortage of affordable rental housing. According to a report by the National Low Income Housing Coalition in 2013, the deficit of units that are both affordable and available to extremely low-income renters is about 188,974 units. Put another way, **for every 100 ELI renters in the state,** **there are only 31 units that are both affordable and available.[[2]](#footnote-2)**

For individuals and families who are either homeless or at risk of homelessness, the lack of affordable rental housing is not an abstract concept, but is *why* they live in the street, in a homeless shelter, or in a motel with drug addicts. The lack of affordable rentals can make it impossible for domestic violence victims to exit shelters or veterans to find a home of their own. The state’s Consolidated Plan must prioritize strategies to increase the supply of rental housing available to the most vulnerable populations in the state, including those with extremely low-incomes and those experiencing homelessness.

3. **Entrenched patterns of racial and economic segregation reinforced by housing policy**

New Jersey residential segregation has been recognized by the New Jersey Supreme Court beginning more than 30 years ago in the *Mount* Laurel decision and as recently as March 10 in the *In the Matter of the Adoption of N.J.A.C. 5:96 and 5:97 By the New Jersey Council on Affordable Housing* decision, as well as by the legislature in the Fair Housing Act of 1985. This segregation blocks access to equal opportunity connected with schools, jobs, and social networking and reinforces a divided society and must be addressed by the Consolidated Plan.

**4.**  **Creation of significant number of tenant-based rental vouchers.**

**5. Homelessness prevention. A comprehensive strategy to end homelessness grounded in the “housing first” approach that has proven to be the most effective approach, in both human and economic terms.** The Interagency Task Force on Homelessness delivered a report to Governor Christie in December 2014, which is still sitting on the Governor’s desk. The recommendations of that report should be incorporated in the 2015 Consolidated Plan. Also, money should be targeted to prevent homelessness because in many cases, homelessness can be prevented with targeted assistance to families on the brink.

**6. Homeless Facilities: a service-enriched emergency shelter in each county.** Even with homelessness prevention, there will always be some individuals who temporarily experience homelessness. To ensure that New Jersey residents do not live on the streets or in the woods in “tent cities,” each county should have a “one-stop” service-enriched shelter modelled after the Bergen Housing Center.

We appreciate your consideration of our comments.

Respectfully submitted,

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1. National Alliance to End Homelessness, *The State of Homelessness in America in 2014,* 52-54. [↑](#footnote-ref-1)
2. Id. At 131. [↑](#footnote-ref-2)