NEW JERSEY DEPARTMENT OF COMMUNITY AFFAIRS



Final Plan

for

New Jersey's Administration

of the

Small Cities Community Development Block Grant

Program

State Fiscal Year 2011

State of New Jersey Chris Christie, *Governor*

Department of Community Affairs Lori Grifa, *Commissioner*

July 23, 2010

Small Cities Community Development Block Grant Program

Administered by the New Jersey Department of Community Affairs

The Small Cities CDBG Program Please Contact:

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2011 Final Plan for New Jersey's Administration of the Small Cities CDBG Program Department of Community Affairs

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Summary Information for State Fiscal Year 2011 Federal Fiscal Year 2010

Community Development Block Grant Program

FFY 2010 Total Allocation: \$7,846,149

State Administration: \$ 335,384

FFY 2010 Funds:	\$7,510,765
Emergency Housing Repair	\$ 20,000
Innovative Development	\$1,000,000
Housing Rehabilitation	\$2,000,000
Public Facilities	\$4,490,765
108 Loan Authorization	to be determined*

* This figure has <u>not</u> been set or adjusted for current loan obligations, which was not available at the time of this publication. Starting SFY 2011 the NJ Department of Community Affairs, NJ Small Cities CDBG Program may be administering the 108 Loan Program. An announcement will be published if and when the program is operational.

Application Submission Schedule

Emergency Housing Repair Fund	Applications accepted throughout the program year.
Innovative Development Fund	Applications must be submitted no later than Friday October 29, 2010.
Housing Rehabilitation Fund	Applications must be submitted no later than Friday October 29, 2010.
Public Facilities Fund	Applications must be submitted no later than Friday October 29, 2010.
108 Loan Program	NJEDA no longer administers the program. To be determined.

Objectives

State Conformance to National Objectives

The State of New Jersey will be guided by applicable federal rules and regulations in carrying out the Small Cities Community Development Block Grant (CDBG) program. All project activities <u>must meet</u> one of the three national program objectives set forth in the Housing and Community Development Act of 1974, as amended:

- 1. To undertake community development activities that principally benefit persons of low and moderate income;
- 2. To prevent or eliminate slums and blight;
- 3. To meet urgent community development needs for which no other resources are available.

The State of New Jersey certifies that not less than 70 percent of the funds will be used for activities that benefit persons of low and moderate income. Low and moderate income is defined in the New Jersey Small Cities CDBG Program as the income of "lower income" families as set forth in the Section 8 Assisted Housing Program of the US Department of Housing and Urban Development (US HUD). The US HUD provides applicable standards, and the standards are included in application instructions distributed to all **eligible units of local government** (list attached).

State Program Objectives

- 1. Support housing rehabilitation programs that maintain the supply of safe, decent, and affordable housing.
- 2. Support and encourage efficient patterns of community development, redevelopment, and capital funding by giving priority to proposals that address documented health and safety concerns and further the policies set forth in the *State Development and Redevelopment Plan*.
- Encourage innovative proposals that combine job creation, housing improvement, and other eligible activities to renew designated revitalization areas.
- 4. Encourage the development of facilities needed to support welfare to work programs such as job training and child and elder care.
- 5. Support and encourage neighborhood revitalization efforts identified in locally developed plans and strategies.

- Improve the availability and adequacy of essential public facilities, and remedy serious deficiencies in areas that principally serve people of low or moderate income.
- 7. Ensure that municipalities have the capacity to implement community development programs and maintain community development improvements.
- 8. To support community development projects of particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community, and where other financial resources are unavailable.

Distribution of Allocation

Contingent on the US HUD's final approval of the State's Consolidated Plan, the distribution of CDBG funds will be as set forth below.

Administration and Technical Assistance

Administration	\$ 33	5,384
Technical Assistance	\$	0

The State is permitted to retain an amount equal to 3 percent of the grant award plus \$100,000 to cover costs associated with the State's administration of the CDBG program.

Funds

Emergency Housing Repair Fund

\$ 20,000

The Emergency Housing Repair Fund has been established to correct emergency conditions in owner-occupied housing where the owner is incomeeligible and unable to obtain assistance from any other public or private source. Assistance will be provided on a first-come, first-served basis to the extent funds are available. Only eligible units of local government may apply on behalf of the homeowner.

The maximum grant award in this category will be \$5,000. However, the DCA will consider exceeding this ceiling if the applicant presents compelling reasons to do so. Prospective applicants are required to contact the Small Cities CDBG Program before submitting a proposal for assistance.

Innovative Development Fund

\$ 1,000,000

This fund provides assistance for activities that meet one of the three national objectives of the program, but that do NOT qualify for consideration under any of the other Small Cities Funds. Innovative development proposals must consist of

more than one eligible activity (excluding administration or planning). The activities proposed must be carried out within the same time period and must be directly related to the implementation of a locally approved redevelopment strategy. Grants may not exceed \$500,000 unless compelling reasons for exceeding that amount are set forth by the applicant and accepted by the DCA.

Housing Rehabilitation Fund

This fund will be used for activities that improve the condition of affordable housing in New Jersey. County-managed programs may be awarded up to \$500,000. Multi-jurisdictional programs may receive grants of up to \$350,000. Awards to programs serving only one municipality may not exceed \$200,000.

Public Facilities Fund

\$ 4,490,765

This fund is established to assist units of local government to construct or improve essential public facilities that will primarily benefit people of low and moderate income. The maximum grant awarded in this category will be \$500,000. However, this maximum may be exceeded if compelling reasons are presented and accepted by the DCA.

108 Loan Program

The 108 Loan Program authorizes the State to extend financing to commercial projects and to real estate and industrial businesses with a proven ability to expand. The 108 Program funds may be used for fixed-asset financing; for land, construction or renovation; for machinery and equipment; or for working capital. Such loans may be provided for up to 90% of the total fixed-asset financing.

The terms of the loans are a maximum of 20 years for real estate, 10 years for machinery and equipment, and 6 years for working capital. The interest rate is fixed at 200 basis points above the rate charged to the State by HUD, except for projects located within a Federal Empowerment Zone. In such locations the interest rate is 175 basis points above the rate charged to the State by HUD. The purpose of the 108 loan program is to stimulate private sector investment and to retain and create permanent job opportunities for people of low and moderate income residing in eligible units of local government. The project may also qualify if it produces a vital service consistent with one of the statutory objectives of the CDBG program.

108 Loan Authorization

\$TBD *

NOTE: NJEDA no longer administers the 108 Loan Program. NJDCA may administer the program.

*This figure has <u>not</u> been established at this time. Program administration will not be included in this figure.

\$ 2,000,000

Matching Requirements

Units of local government seeking assistance from the Innovative Development Fund, the Public Facilities Fund, and the Housing Rehabilitation Fund are required to commit a percentage of the grant request, based on the applicable Municipal Distress Index ranking (MDI Rank). The matching share is determined as follows:

MDI Rank	Matching Share
0 to 100	5%
101 to 200	10%
201 to 300	15%
301 to 400	20%
401 and above	25%

The MDI rank for each Small Cities-eligible unit of government is provided in the Appendix. Where more than one municipality is participating in the proposed project, the matching requirement will be determined by combining the MDI of each participant and dividing by the number of participating municipalities. Where in-kind services will be used, identified costs borne by the applicant must be consistent with established DCA standards as set forth in the applicable application guide. The matching fund requirement shall not apply to Emergency Housing Repair assistance and Innovative Development Fund grants.

Number of Applications

Applicants may apply for one Housing Rehabilitation grant, one Public Facilities grant, and one Innovative Development grant per year. The Department retains the discretion to award only one grant a year per jurisdiction.

Open Balances of Prior Awards

The Department reserves the right not to fund an applicant should a substantial balance exist in prior grant awards at the time of application.

Reallocation of Funds

The DCA may transfer funds (including those recaptured from cancellations or closeout balances and program income) among funding categories based on demand for assistance demonstrated by the number of applications received.

Evaluation Criteria

Emergency Housing Repair

Funding to correct emergency conditions in owner-occupied housing units may be requested by an eligible local government at any time throughout the funding year and will be evaluated according to the following considerations:

- 1. Compliance with a statutory National Objective.
- 2. Documented needs and costs.
- 3. Certification that other public or private funding sources are not available.
- 4. Date of submission.

108 Loan Program

This program is currently in the process of transferring to the Department. Program requirements have not been establish as of this date. However, once the program is setup applications for 108 loans will be evaluated by the Department to determine compliance with applicable federal statutes and regulations, with State program objectives and for credit worthiness.

Community Development and Housing Needs Statement

To be considered for assistance from any Small Cities fund (with the exception of the Emergency Housing Repair Fund and the 108 Loan Program), the applicant must provide a *Community Development and Housing Needs Statement*. This statement must include at least three components – community development needs, housing needs, and status of applicable land use plans. The proposed program must address at least one of the areas identified in the Statement of Community Development and Housing Needs to be considered for a grant. Instructions for preparing this document are set forth in the SAGE application guide for each Small Cities Fund.

Innovative Development

To qualify for funding this year, applicants must document that the problem to be addressed and/or the remedy proposed fall(s) outside the scope of other funding categories. Only programs that are designed to provide 100 percent benefit to people of low and moderate-income or programs that meet one of the national

objectives and are designed to create alternative energy sources and energy conservation are eligible.

Housing Rehabilitation, Public Facilities and Innovative Development Funds

All proposals will be subject to the following review process. Utilizing a standardized Application Review Form (Attachment A), staff of the Small Cities CDBG Program will review all applications to determine if threshold requirements are met. **Applications that fail to meet a threshold requirement will not be funded.**

Threshold Requirements

- Attachment A: Refer to the Threshold Requirements in the Small Cities Application Review Form attached, page 12.
- All Federal Compliance Items: Resolutions for citizen participation and affirmatively furthering fair housing, a grant management plan, an environmental review record (ERR) for the level of review required and a phase I environmental site assessment if required (the ERR must include proof of the official public notice and letters documenting findings, see the Small Cities ERR Handbook section on the Program's web page), professional services agreement drafts, cooperative agreement draft, an adopted policies and procedures manual for housing programs and matching funds certification must be 100 percent complete and ready for execution before submitting the application. Applicants that do not complete the above items and do not submit them with the application <u>may not be eligible for funding</u>.
- All Housing Rehabilitation Applications: Housing programs must establish a revolving loan fund and include such provision in an adopted policies and procedures manual.

Rated Criteria

Applications that meet all threshold requirements will then be scored based upon the following criteria:

• *Municipal Distress:* The relative need of an applicant will be evaluated by using the Statewide Municipal Distress Index (MDI), which appears in the attached table pages 14 -16. The indices are used by State agencies in allocating need-based assistance to municipalities. Applicants may receive up to 100 points as follows:

MDI Rank	Score
0 to 100	100 Points
101 to 200	80 Points
201 to 300	60 Points
301 to 400	40 Points
401 and above	20 Points

- Readiness to Proceed: The degree to which an applicant is ready to proceed with the proposed project will be evaluated as follows: Housing Rehabilitation applications that include a list of three or more income-eligible households with biddable work write-ups will receive 100 points.
 Public Facilities applications that include biddable plans and specifications will receive 100 points.
- **Balance Ratio:** Applicants will be rated on the remaining balance of grant awards received in a funding category over a three year period, including all open grants at the time of application. Applicants with ratios of .50 or less will receive 100 points and applicants with ratios above .50 will receive zero points.
- **Past Performance:** Past performance will affect an applicant's overall rated score. Good past performance will boost the score. However, multiple instances of poor performance in managing grants, e.g., where concerns and findings were documented as a result of monitoring visits, may lower the overall rated score.

Rating	Score
Good	51 to 100 Points
Fair	1 to 50 Points
Poor	0 to -100 Points

Eligible Activities

Activities assisted under the Small Cities CDBG Program are limited to the following:

- 1. Acquisition of real property that is blighted, appropriate for rehabilitation, appropriate for preservation as a historic site, or used for provision of public works or other public purposes.
- 2. Acquisition, construction, reconstruction, or installation of public works or facilities (except buildings for the general conduct of government) and site and other improvements.

- 3. Code enforcement in deteriorated or deteriorating areas in which such enforcement may arrest the area's decline.
- 4. Clearance, demolition, removal, and rehabilitation of buildings.
- 5. Special projects directed to the removal of architectural barriers that restrict the accessibility of the elderly and handicapped.
- 6. Payments to housing owners for losses of rental income incurred in holding units for relocated individuals and families displaced by activities under the program.
- 7. Disposition of real property acquired pursuant to the program.
- 8. Provision of public services if the local government has not provided such services during the 12-month period immediately preceding implementation of the program.
- 9. Payment of the non-Federal share required in connection with a Federal grant-in-aid program undertaken as part of this program.
- 10. Payment of the cost of completing a project funded under Title I of the Housing Act of 1949.
- 11. Relocation payments for displaced individuals, families, businesses, and organizations as a result of activities under the program.
- 12. Activities necessary to develop a comprehensive community development plan and to develop a policy-planning-management capacity to enable the recipient to more effectively administer the program.
- 13. Payment of reasonable administrative costs.
- 14. Activities carried out by public or private non-profit organizations including:
 - a. Planning
 - Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities (except for buildings for the general conduct of government), site improvements, and utilities and commercial or industrial buildings or structures.
- 15. Assistance to non-profit organizations serving non-entitlement areas, local development corporations or entities organized under the Small Business Investment Act of 1985 to carry out a neighborhood revitalization or community economic development or energy conservation projects, including the development of shared housing opportunities for the elderly (other than by construction of new facilities).
- 16. Activities necessary to the development of a comprehensive community-wide energy-use strategy.
- 17. Assistance to private, for-profit entities, when the assistance is appropriate to carry out an economic development project.
- 18. Rehabilitation or development of housing assisted under Section 17 of the United States Housing Act of 1937.

- 19. Assistance to facilitate the substantial reconstruction of housing owned and occupied by low- and moderate-income persons.
- 20. Technical assistance to increase the capacity of public or non-profit entities to carry out eligible neighborhood revitalization or economic development activities.
- 21. Housing services designed to assist homeowners, tenants, and others seeking to participate in eligible housing activities.
- 22. Assistance to institutions of higher education capable of implementing eligible activities.
- 23. Assistance to public and private organizations (for-profit as well as non-profit) to facilitate the development, stabilization, and expansion of micro-enterprises.
- 24. Assistance to facilitate and expand homeownership by subsidizing interest rates, financing acquisition, guaranteeing mortgages, paying up to 50% of down payments, or paying reasonable closing costs for income-eligible people.
- 25. Activities necessary to repair and operate housing units acquired through tax foreclosure to prevent abandonment and deterioration.

Grant Funds Recaptured and Other Recaptured Funds (Program Income)

CDBG Grants

Grant funds recaptured will remain with the grantee when the grantee demonstrates, as determined by the State, that recaptured funds can be distributed in a timely way to carry out the same activity for a specific project in accordance with a reuse plan that has been approved by the State.

The State of New Jersey interprets the phrase "the same eligible activity" to mean that the grantee must use the recaptured funds for the same activity for which it was originally funded, as taken from the list of eligible activities (see pages 8-10). For example, if the recaptured funds were derived from a loan to a private firm, it must be used again for loans to private firms. This does not mean that the income may only be used for an additional loan to the same firm. Nor can "continuing the activity" be so broadly defined as to mean use for the same general purpose, such as economic development.

The State will consider exceptions to this policy on a case-by-case basis. However, in the event a grantee fails to demonstrate an acceptable reuse of recaptured funds, the State will recapture program funds and distribute such funds in accordance with the provisions set forth in the applicable plan for **Distribution of Allocation**. A recaptured funds statement must be included in the application documenting the balance of all previous grant funds recaptured by applicant as of the date of application. The Department reserves the right not to fund a new project should a substantial balance exist that is not obligated in a particular funding category.

Applicants are required to submit a summary statement each year on the balance of the revolving loan funds. The funds must be in separate accounts that are based on the original activity of the local program from the Housing Rehabilitation, Innovative Development, and Employment Development funds. Refer to the Small Cities Program Handbook, Grant Management Section, and Revolving Loan Fund Reporting Procedures for further guidance.

Displacement

The Small Cities CDBG Program will seek to minimize involuntary displacement of persons from their neighborhoods and homes and to mitigate the adverse effects of any such displacement on low-and moderate-income persons. The State will require applicants to assess all feasible alternatives to any activity resulting in involuntary displacement.

In the event that involuntary displacement is the only feasible alternative, the State will require that grantees comply with the requirements of the Housing and Community Development Act of 1974, as amended; the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended; and the statutory amendments implementing regulations (CFR Part 24). In addition, the State will require that grantees comply with the requirements of the New Jersey Relocation Assistance Acts (P.L. 1971, c.362 and P.L. 1967, c. 79) and the New Jersey Regulations for Provision of Relocation Assistance (N.J.A.C. 5:40-1 et seq.).

Notice of Awards

DCA will announce the 2011 Small Cities CDBG awards on the Department and Small Cities' website page.

Bonus Awards

The Small Cities CDBG program will consider awards of additional funds throughout the year to those grantees whose production/performance and/or nature ok activity warrant additional funding. Attachment A

Small Cities Application Review Form, Final Plan SFY 2011

Applicant:		\$Requested
Project Type: Public Facilities Ho	using Rehabilitation	Innovative Development Application No
Threshold Requirements		Comment
Does the proposal meet one of the National		Benefit to Low/Moderate Income People
Objectives set forth in the Housing and	🗌 Yes 🗌 No	Prevention or Elimination of Slums & Blight
Community Development Act?		Urgent Need
Where Benefit to Low/Moderate Income		Census or Survey or Housing Rehabilitation, HR
people is claimed, indicate the source of the		
claim and whether the claim is Area-Wide		Area-Wide or Special Population or Housing
or targeted at a Special Population or HR.		Rehabilitation HR
For all proposals, provide the jurisdiction-		Jurisdiction-wide (Municipal/County/Target) Number Benefiting:
wide population, number of low/ moderate		Population Number of L/M Percent L/M
income people and L/M percent. Provide		
the total number of people served and		Total number of people served by project:
number of low/moderate income people		Population Number of L/M Percent L/M
served and the percent L/M.		
Does the proposal address at least one of the	Yes No	
State Program Objectives?	Refer to 1 to 8 in page 2	
	of the Plan.	
Are the proposed activities permitted by the	Yes No	
Act?		
Does the application include evidence of a		
public notice (display ad) in compliance	☐ Yes ☐ No	
with Citizen Participation Requirements?		
Does the proposal address at least one of the		
areas identified in the applicant's Statement	🗌 Yes 🗌 No	
of Community Development and Housing		
Needs?		
Does the application include evidence that		
the required local match will be met?	☐ Yes ☐ No	
Does the application establish a revolving		
loan fund and include a provision in the	∐ Yes ∐ No	
policies and procedures manual? (HR		
programs – only)		
Does the application include evidence that		Compliance Items:
the required compliance items have been	🗌 Yes 🗌 No	1 Citizen Participation Resolution, also as above
completed?		2 🔲 Fair Housing Resolution
		3 Matching Funds Certification
Note: The application may be rejected if		4 🔲 Grant Management Plan
applicant failed to complete the required		5 Professional Services Agreements (Drafts)
compliance items and the establishment of a		6 Environmental Review Record
		7 Policies & Procedures Manual (HR Only)
revolving loan fund, HR programs - only.		
		8 Cooperative Agreement (ID Only - Draft)
Rated Criteria		Comment
What is the applicant's Municipal Distress	Score:	Score for MDI Rank: Refer to page 7 and the MDI Ranking Table.
Index rank (MDI)?		
	(100 Max.)	
Desethe surlisent slaim "Deseliness to	(100 Widx.)	
Does the applicant claim "Readiness to		$1 \square$ A list of income-eligible housing units to be improved
Proceed"?	Yes No	including biddable work write-ups (HR Only)
	Score:	2 Biddable Plans and Specifications (PF Only)
	(100 Max.)	
Is the applicant's balance ratio equal to or	Calculation:	Score for Balance Ratio:
less than .50?	Bal./Tot.= B.	• Ratios of .50 or less will receive 100 points
	Ratio	• Ratios above .50 will receive zero points.
Balance Ratio:	/	
Balance of all Small Cities CDBG grant	=B.	
funds prior three years & open = Bal .	Ratio	
Total amount of all SC CDBG grant awards	Score:	
prior three years & open grants = Tot.		
prior unce years & open grants – 10t.	$\overline{(100 \text{ Mar})}$	
	(100 Max.)	

Attachment A

Applicant: _____

Small Cities Application Review Form, Final Plan SFY 2011 (Cont.)

Applicant:			_\$	Requested
Project Type: D Public Facilities	Housing Rehabilitation	Innovative Development	Application No.	
Rated Criteria (Cont.)		Co	omment	
Describe the applicant's past grant management performance in terms of good, fair, and poor. Provide a brief justification for your score.	☐ Good, ☐ Fair, ☐ Poor,	Justification for score:		
Scoring: Good = 51 to 100 points, Fair = 1 to 50 points, Poor = 0 to - 100 points	Score: (100 Max.)			
Additional Policy Considerations		Ca	omment	
Will other funds be leveraged (beyond the required match) if this grant is awarded?	Yes No	If yes, explain below.		
Does the application include evidence that an experienced and competent management team will implement the project?	Yes No	If no, explain below.		
Application Scoring Summary				
Does the application meet threshold requirements?				

that an experienced and competent management team will implement the project?	🗌 Yes 🗌 No	
Application Scoring Summary		
Does the application meet threshold requirements? Yes No		
Rated criteria?	Total Score:	
Recaptured funds statement provided?	Balance of Recapture	ed Funds \$
Does the applicant have a balance in prior awards? ☐ Yes ☐ No	Open Balances of Pr	or Awards \$
Based on the above threshold requirements and rated criteria, do you find this application: Eligible? Yes No	Notes:	
Fundable? 🗌 Yes 🗌 No		
Amount \$		
	f Reviewer Date	

2011 NJ Eligible Small Cities Municipalities & Counties (With Municipal Distress Index (MDI) Ranking Revised May 12, 2010

Atlantic County	MDI Rank	Cumberland County	<u>MDI Rank</u>
Egg Harbor City	73	Commercial Township	23
Hammonton Town	124	Deerfield Township	28
Port Republic	280	Downe Township	55
-		Fairfield Township	83
Burlington County	MDI Rank	Greenwich Township	21
		Hopewell Township	184
Beverly City	36	Lawrence Township	30
Burlington City	101	Maurice River Township	49
North Hanover Township	209	Shiloh Borough	44
Palmyra Borough	109	Stow Creek Township	100
Pemberton Borough	63	Upper Deerfield Township	80
Pemberton Township	76		
Riverside Township	96		
Wrightstown Borough	114	Hunterdon County	<u>MDI Rank</u>
		Alexandria Township	504
Camden County	<u>MDI Rank</u>	Bethlehem Township	500
		Bloomsbury Borough	380
Gloucester City	15	Califon Borough	484
Pine Valley Borough	473	Clinton Town	498
Tavistock Borough	557	Clinton Township	524
		Delaware Township	479
		East Amwell Township	521
<u>Cape May County</u>	MDI Rank	Flemington Borough	219
		Franklin Township	357
Avalon Borough	421	Frenchtown Borough	306
Cape May City	202	Glen Gardner Borough	301
Cape May Point Borough	343	Hampton Borough	233
Dennis Township	259	High Bridge Borough	325
Lower Township	223	Holland Township	375
Middle Township	144	Kingwood Township	356
North Wildwood City	170	Lambertville City	418
Sea Isle City	370	Lebanon Borough	511
Stone Harbor Borough	455	Lebanon Township	403
Upper Township	350	Milford Borough	436
West Cape May Borough	309	Raritan Township	524
West Wildwood Borough	310	Readington Township	515
Wildwood City	29	Stockton Borough	458
Wildwood Crest	254	Tewksbury Township	510
Woodbine Borough	86	Union Township	541
		West Amwell Township	416

Mercer County	MDI Rank		
		Andover Borough	269
East Windsor Township	342	Andover Township	302
Hightstown Borough	90	Branchville Borough	334
Hopewell Borough	431	Byram Township	437
Hopewell Township	531	Frankford Township	326
Lawrence Township	472	Franklin Borough	158
Pennington Borough	438	Fredon Township	385
Princeton Borough	374	Green Township	423
Princeton Township	446	Hamburg Borough	267
Washington Township	556	Hampton Township	409
West Windsor Township	535	Hardyston Township	320
		Hopatcong Borough	298
Monmouth County	<u>MDI Rank</u>	Lafayette Township	316
		Montague Township	266
Little Silver Borough	520	Newton Town	110
		Ogdensburg Borough	250
<u>Morris County</u>	<u>MDI Rank</u>	Sparta Township	442
		Sandyston Township	292
Dover Town	27	Stanhope Borough	225
		Stillwater Township	187
Passaic County	MDI Rank	Sussex Borough	57
		Vernon Township	369
North Haledon Borough	358	Walpack Township	195
Totowa Borough	407	Wantage Township	311
Salem County	MDI Rank	Warren County	MDI Rank
		Allamuchy Township	401
Alloway Township	347	Alpha Borough	125
Carneys Point Township	72	Belvidere Town	75
Elmer Borough	118	Blairstown Township	379
Elsinboro Township	167	Franklin Township	244
Lower Alloways Creek Twp.	181	Frelinghuysen Township	389
Mannington Township	99	Greenwich Township	360
Oldmans Township	162	Hackettstown Town	153
Penns Grove Borough	6	Hardwick Township	353
Pennsville Township	215	Harmony Township	196
Pilesgrove Township	304	Hope Township	235
Pittsgrove Township	169	Independence Township	383
Quinton Township	58	Knowlton Township	210
Salem City	34	Liberty Township	303
Upper Pittsgrove Township	262	Lopatcong Borough	287
Woodstown Borough	69	Mansfield Township	242
2		Oxford Township	87
		Phillipsburg Town	24
Sussex County	<u>MDI Rank</u>	Warren County - Continued	MDI Rank

Pohatcong Township	201
Washington Borough	135
Washington Township	340
White Township	327

MDI Rank

Cape May County	262
Cumberland County	56
Hunterdon County	427
Mercer County	373
Salem County	151
Sussex County	290
Warren County	248

excluding Ocean City excluding Bridgeton, Millville, Vineland excluding Ewing, Hamilton, City of Trenton