

**TOWNSHIP OF WAYNE
PASSAIC COUNTY
NEW JERSEY**

**U.S. DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT
ANNUAL CONSOLIDATED PLAN**

FY 2009

**Display period
October 14, 2008 to Nov. 15, 2008**

Prepared by:

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Executive Summary

Title I of the Housing and Community Development Act of 1974 (the Act) established the Community Development Block Grant (CDBG) Program to provide a framework and funding source for municipalities and other entities to address community development needs. The primary objective of the program is "the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income."

Wayne Township is an entitlement community that is eligible to receive funding each year, based on approval of its Final Statement and Application for funding in accordance with regulations of the U.S. Department of Housing and Urban Development (HUD). The township continues to provide varied housing opportunities as well as expanding opportunities for improvement in the quality of life of its residents.

This Application for Federal Assistance for fiscal year 2009 is for \$195,000. The township proposes to utilize the funds for road resurfacing and park improvements in CDBG eligible residential neighborhoods as well as fund administrative costs.

During FY 2009, Wayne Township will provide assistance for street and public park improvements. Each of these activities will be undertaken to meet the Performance Measure for Objective of Suitable Living Environment and Outcome of Sustainability.

Geographic distribution of the activities: Activities are concentrated in the lower income census areas of Wayne Township: Census Tract 2461.04, Block Group 1; Census Tract 2463, Block Groups 1-4; (see appended maps).

Evaluation of Past Performance

Since its initial participation in the CDBG Program in 1990, the township has expended a total of \$4,141,449.00 on various CDBG eligible projects. These projects include various street and park improvements, housing rehabilitation of substandard housing units occupied by income eligible low and moderate income families, the purchase of a senior bus and family counseling services provided to income eligible low and moderate income families.

Overall, the projects as defined by the township's annual plan submissions to HUD have been completed and are consistent with the adopted priorities and goals of the Township's 2005 – 2009 Consolidated Plan. Issues identified by HUD through monitoring of the township's program regarding timeliness of plan submission and expenditure of funds and satisfying HUD reporting guidelines and financial accountability have been addressed. Improvements to the overall management of the program have also implemented. The Township Planning Department has primary responsibility for the management of the CDBG program and will continue to monitor the program for compliance with all HUD regulations and procedures.

Community Development Annual Objectives

During the course of 2009, Wayne Township will continue to assess the relationship of available CDBG funding to its existing program objectives. In preparing the 2009 Annual Plan, the township sought a strategy that would best allow Wayne to meet the National Objectives as delineated by the United States Department of Housing and Urban Development (HUD). In addition, the township has identified, and will continue to attempt to identify, other areas of need that will not deviate from our goals. These program goals and priorities are outlined in detail in the Township of Wayne 2005-2009 Consolidated Plan previously adopted by the Township as approved by HUD after public notice and hearing.

Application Form 424

- see attached

Resources – Sources of Funds

Wayne Township is not a major urban area with all of the attendant urban problems encountered by many of the nation's cities. Its housing plan and initiatives are directed primarily at meeting the housing needs identified as part of a municipal constitutional affordable housing obligations under New Jersey law. The Consolidated Plan process has helped Wayne quantify housing needs and identify the ways in which the township's plan may address those needs. While there are multitudes of federal, state and local programs in place to address various housing needs, Wayne must primarily direct its efforts to identifying those resources that are designed to enable the township to carry out its programs. The following sections outline the funding and other resources anticipated to be made available over the next five years in implementing the township's community development strategies.

a) Federal Programs.

The Township of Wayne receives funding under the Community Development Block Grant Program (CDBG) provided by the US Department of Housing and Urban Development. The program provides annual grants to Wayne to fund community development activities such as housing rehabilitation, infrastructure improvements, and other community development activities. The program targets assistance to lower income/minority households or areas. At least 80% of the funding is to be spent on capital projects and no more than 20% may be spent on program planning and administration. Wayne has received funding based upon approved Block

Grant applications over six years as follows:

CDBG Funding

1990	\$198,000
1991	\$222,000
1992	\$220,000
1993	\$236,000
1994	\$257,000
1995	\$248,000
1996	\$244,000
1997	\$243,000
1998	\$230,000
1999	\$232,000
2000	\$241,000
2001	\$241,000
2002	\$236,000
2003	\$252,000
2004	\$245,000
2005	\$231,027
2006	\$206,768
2007	\$204,444
2008	\$195,210

In addition, the township will apply for \$195,000.00 in CDBG funding this year. Wayne Township will continue to file applications for all funding for which the township is eligible in future years. At this time, the exact amounts for which Wayne Township may be eligible beyond the current fiscal year are unknown. Program income collected from the repayment of funds loaned for housing rehabilitation has been received. Such funds will be used to continue to provide housing rehabilitation loans to income-qualified households.

Wayne Township does not directly participate in the McKinney programs that provide housing for the homeless. Wayne Township, as part of Passaic County, is part of the Passaic County Continuum of Care. In FY 2007, the CoC was awarded \$2.6 million in program funds.

Wayne Township does not have a Housing Authority nor does it administer a Section 8 rental assistance program.

Wayne Township does not directly participate in the Low Income Housing Tax Credit Program. There are no known proposed affordable housing projects currently seeking such assistance from NJHMFA. Wayne Township would not unduly withhold support from any project seeking LIHTC's.

b) State Programs.

The township will receive reimbursement from the State of New Jersey for expenditures under the general assistance program, including costs associated with the homeless and homeless prevention efforts. During FY 2008, an estimated total of \$36,000.00 was expended for housing payments (rent for rooms in rooming houses, motels, private homes where rooms may be available, for rent arrearages) and general assistance in order to prevent homelessness. For estimation purposes only, this amount could be considered an annual amount available from the state.

c) Local Programs.

The Township of Wayne has supported the development of two affordable housing projects (Preakness Commons and Siena Village senior citizens housing) through land acquisition, utilization of municipal property, and local funds raised either through the issuance of bonds or by direct budget appropriations. The township provides tax abatement for these projects.

The Sienna Village complex is completed and is fully occupied. This complex has 125 senior affordable housing rental apartments and is exclusively rented to senior citizens. The Township was directly involved in the development of this project. The township is committed to providing rental assistance payments to make the rents in the project affordable. Over a term of 15 years, the township will provide \$50,000 per year in rental assistance payments for a total of \$750,000.

Preakness Commons is also completed and provides 94 rental units affordable to families. This project also includes handicap accessible units

Wayne Township collects development fees for affordable housing initiatives which are then deposited into a township housing trust account to be used exclusively for affordable housing activities consistent with the township's COAH certified affordable housing plan. These fees are collected as part of the building permit process and are based on the assessed valuation of new construction. The funds will be used to offset the costs of local initiatives, as well as other components of the township's Fair Share and Affordable Housing Plan.

d) Private Resources.

Affordable housing constructed in Wayne has been financed privately. All the township's planned affordable housing developments have been constructed and are now occupied. These include: Lincoln Crossing project, located on an Urban Renewal site; Brittany Chase, Lincoln Properties and Zibae projects. No figures are available regarding the projected cost or financing vehicle for these developments.

Outcome Measures

The Government Performance and Results Act of 1993 (GRA) mandates that federal programs improve their effectiveness and public accountability by focusing on results. On June 10, 2005 HUD published (70 FR 34044), a notice describing its proposed outcome performance

measurement system and solicited comments from the general public. On March 7, 2006 HUD published (71 FR, 11470) a notice finalizing the Outcome Performance Measurement System. As a result, the Township's Consolidated Plan for 2005-2009 must be amended to reflect this new performance management system and the Township's 2009 Annual Action Plan must also incorporate performance measurement measures in accordance with the March 7th publication. The amendment to the Township's Consolidated Plan is not considered a major amendment unless new activities are added to the plan. It is noted the Township's 2005-2009 Consolidated Plan has been amended to provide performance measurements but that no new activities have been added to the Plan.

According to the March 7th notice "The system has been designed to enable grantees and HUD to inform Congress, OMB and the public of many of the outcomes of the covered programs. The goal is to begin focusing on more outcome-oriented information and be able to aggregate results across the broad spectrum of programs funded by these block grants at the city, county, and state level."

Under the Outcome Performance Measurement System, grantees must determine which of three objectives best describes the purpose of the activity. These objectives are: Suitable Living Environment, Decent Housing, and Creating Economic Opportunities.

Similarly, once the objective for the objective is selected, the grantee will then choose which of three outcome categories best reflects what they are seeking to achieve by funding the activity. These outcome categories are: Availability/Accessibility, Affordability, and Sustainability: Promoting Livable or Viable Communities.

Objectives and Outcome measures are presented for each activity identified in this plan as required.

Activities to be Undertaken

Activities to be undertaken as described in this plan are consistent with the statement of goals and objectives enumerated in the township's 2005-2009 Consolidated Plan. Specifically the Township's Consolidated Plan states "Non-housing community needs such as infrastructure repair are anticipated to gain more importance over the next five years as the Township continues to work towards satisfying its affordable housing requirements pursuant to its affordable housing plan. The deterioration of infrastructure associated with low and moderate income neighborhoods is viewed by the Township as a contributing factor towards creating blight and must be addressed in order to stabilize these neighborhoods from further deterioration and disinvestment."¹ Consistent with this overall strategic goal, the activities described in this plan

¹ Township of Wayne 2005-2009 Consolidated Plan, page 33.

specifically implement Goal 1 which is “To protect the Township's infrastructure from deterioration with proper maintenance”.²

a) Road Resurfacing Program

The township will undertake a road renovation/resurfacing program to bring current substandard road conditions up to acceptable engineering standards. As discussed in the township's consolidated plan, it is the township's intention to improve the infrastructure in CDBG eligible areas in order to stabilize property values and prevent blight. Streets to be included in this year's program are: Oakley Way and McGrogan Court. These roadways serve the same resident population service area (see attached map) but were each analyzed individually to insure project eligibility. These streets are all located entirely within Census Tract 2461.04, Block Group 1 which is a CDBG eligible census tract containing a low and moderate population of 33%. The minimum threshold for CDBG eligibility for the township is 26.2 % consequently; this is a CDBG eligible area.

This program provides an area benefit and is consistent with the national objectives pursuant to 24 CFR Part 570, Subpart C – Section 570.208(a)(1). The activities are eligible under 24 CFR Part 570.201(c). The estimated time for completion of this project is December 31, 2009.

Amount Budgeted: \$98,700.00

Objectives and Outcomes

The Road Resurfacing Program for 2009 affects two local residential neighborhoods within Census Tract 2461.04, Block Group 1. Both streets are within close proximity of each other.

The primary objective accomplished by the repaving program is to provide a suitable living environment by bringing existing substandard roadways into compliance with current engineering standards. The project specifically seeks to promote the maintenance and improvement of existing infrastructure to avoid conditions that contribute to private sector disinvestment and subsequently neighborhood decline.

The anticipated outcome is the creation of a sustainable and vibrant residential community whereby low and moderate income families can enjoy and utilize a road network that is up to current engineering standards and is maintained in a manner that is consistent with other areas of the Township. This helps to solidify the community and eliminate disparity in infrastructure conditions that would otherwise tend to segregate neighborhoods into economic classes.

Results are measured in the number of low and moderate income persons that are no longer

served by a substandard roadway in need of maintenance. The Road Resurfacing Program is estimated to serve approximately 40 low and moderate income persons in this manner.

² Ibid

b) Park Upgrade Program

The Department of Parks and Recreation proposes improvements and upgrades to Fayette Park, Minnisink Park, Wayne Park, Boulevard Park, Hamilton Park and Tintle Park. The upgrade and renovation project is intended to improve the facilities and include new fencing, play equipment, bleachers signage and curbing. A detail of the proposed improvements is appended to the plan.

This project is intended to bring the parks up to the standards enjoyed by other park locations throughout the township.

This program provides an area benefit and is consistent with the national objectives pursuant to 24 CFR Part 570, Subpart C – Section 570.208(a)(1). The activities are eligible under 24 CFR Part 570.201(c). The estimated time for completion of this project is December 31, 2008.

Results are measured in the number of low and moderate income persons that are no longer served by a substandard recreational facility.

SEPARATE PARK AREAS: The park improvements in Wayne Area Park and Boulevard Park are estimated to serve 2,361 persons of which 722 (30.6%) are low and moderate income persons in Census Tract 2463.00 Block groups 1 and 4. The park improvements in Fayette Park in CT 2463.00 Block groups 2 and 3 are estimated to serve 2,629 persons, of which 1,087 (41.3%) low income persons. Tintle and Hamilton Park are located in CT 2461.04 Block Group 1 and are estimated to serve

Amount Budgeted: \$81,300.00 = allocated to each park as follows:

Minnisink Park – \$9,850.00

Boulevard Park – \$6,240.00

Wayne Park – \$12,063.00

Fayette Park - \$4,800.00

Tintle Park – \$18,950.00

Hamilton Park – \$29,397.00

Outcome and Objective: Suitable living environment/ Sustainability

c) CDBG Administration.

This project will entail the use of CDBG funds for reasonable administration costs and carrying charges related to the planning and execution of community development activities. Program administration costs are limited to the costs of overall program management, coordination, monitoring and evaluation, as described by Section 570.206(a), and to the specific activities described by Section 570.206(b) through (g). These activities will involve but shall not be limited to the following:

- Citizen participation
- Fair housing activities
- Development of submissions or applications for

Federal programs

- Preparing program budgets, schedules and amendments
- Evaluating program results against stated objectives
- Coordinating the resolution of audit and monitoring findings
- Developing systems for assuring compliance with program requirements
- Monitoring program activities for progress and compliance with program requirements
- Preparing reports and other compliance documents related to the program for submission to HUD, and,
- Developing intra-agency agreements and agreements with sub-recipients and contractors to carry out program activities.

Additionally, the township will engage the services of a CDBG consultant to assist the township in the administration of the program. Given the limited staffing within the township's planning department and the growing demands placed on the planning staff, it was necessary to incorporate consultant services to assist the township and to act more or less as an extension of the staff in order to render a more effective program. This cost is included within this budget.

The Township of Wayne has specifically designed all its activities and its objectives to reflect HUD National Objectives and therefore meets the primary benefit test of 70% to low and moderate income persons.

Amount Budgeted: \$ 15,000.00

Summary of Projects -FY 2009 and Amounts of CDBG Funds Budgeted

Public Facilities and Improvements	\$180,000.00
Program Administration Costs	\$ 15,000.00
Total	\$195,000.00

Geographic Distribution

Assistance provided to applicants for rehabilitation funding will be given to eligible lower income households located anywhere within the legal limits of Wayne Township. While there is no specific targeting proposed in this program, it is expected that most applicants will come from the western section of the township (known as the "Old Wayne" area) particularly in areas in or near the flood prone areas of the Pompton and Passaic Rivers, as this is the area where most deficient housing is believed to exist. This area is located in census tract 2463 which also contains the largest percentage of pre-1940 housing in Wayne.

Areas targeted for infrastructure improvements are identified by eligible census tract and block group data utilizing capped income limits for low and moderate income persons pursuant to the U. S. 2000 Census. With respect to identifying limited clientele eligible activities, the township utilizes uncapped income dated as defined by HUD. The Township of Wayne is a special exception community and therefore, uses the upper quartile exception criteria established by HUD regulations. HUD regulations provided that communities may qualify an area benefit activity based on serving an area that contains a percent of low and moderate income persons that is not lower than that contained in a grantee's upper one-fourth of all areas within its jurisdiction in terms of the degree of concentration of low moderate income population. For the Township of Wayne, this upper quartile is 26.2 percent.

An analysis of the most recent township census data from 2000 indicates that populations of low and moderate income families are concentrated within the following Census tract and block groups utilizing the upper quartile percentage discussed previously in this plan document: Census tract 2461.02, Block Group 1 located near the central portion of the township; Census tract 2461.03, Block Groups 1, 2 and 6 also located in the central portion of the township; Census tract 2461.04, Block Group 1 located in the south easterly corner of the township; and Census tract 2463 Block Groups 1,2,3, and 4 located in the southern region of the township associated with the flood plain of the Passaic River. The programs are designed to assist these families within these designated tracts and defined service areas consistent with applicable programmatic guidelines.

A further analysis of 2000 Census information indicates that there are no concentrations of minority populations within the township nor are there concentrations of low and moderate income minority persons within the township in any particular geographic area.

Homeless and Other Special Needs Activities

There is no church, civic or community group based in Wayne Township actively involved in the provision of shelter or other services for the homeless.

The township provides support services for homeless (or potentially homeless) individuals and families through the staffing of the Welfare Department and allocating funds for assistance which are then reimbursed by the State of New Jersey. The township expects that the Welfare

Department staff will continue its efforts to assist homeless individuals and that Passaic County will provide services to homeless families. It is important to note that there are not a significant number of people who need assistance of this nature in Wayne and homelessness is not considered a major issue for this community. However, the township believes that these are important services to provide, even if a small percentage of Wayne's residents are provided with assistance.

Generally speaking, individuals that are homeless or at risk of becoming homeless is referred to the township by friends, neighbors, other concerned citizenry or are walk in clients who become aware of the township's assistance program either by other governmental agencies or by their own initiative inquiring at the municipal building. The needs of the client are then evaluated by the Township Welfare Director and assistance is provided to address their specific need. Types of assistance provided by the township include counseling, payments for emergency housing on a temporary basis, payments to supplement an individual or family's income to prevent homelessness or if more long term assistance is required referral to the Passaic County Board of Social Services. Individuals requiring shelter assistance may also be referred to Catholic Family Services or the Red Cross located in Paterson.

The transient nature of the homeless population renders follow up and statistical analysis difficult. Most clientele served are passing through the community and do not remain. During 2006, a total of five (5) persons received homeless assistance. Due to the transient nature of the homeless population there are no specific goals regarding the homeless offered for this program year. The township however, will continue its program of assisting homeless individuals and families as the need arises throughout the year as described herein.

The township does not have any plans to provide additional housing for non-homeless persons with special needs nor homeless persons in 2009.

Addressing Underserved needs

The underserved need in Wayne Township is affordable housing. Generally, home prices and rents are not affordable. The Township provides an operating subsidy to one assisted housing complex and has supported the development of other affordable housing units including the construction of affordable rental units for families that include handicapped accessible apartments (Preakness Commons). It is further noted that there are a number of group shelters that serve other segments of the region's and township's housing needs which are identified in the Township's Affordable Housing Element. CDBG funds, however, are generally targeted to infrastructure improvements in neighborhoods where the majority of lower income residents live. Program income will be used to provide housing rehabilitation funds to assist income eligible households to make modest home repairs to bring their units up to codes or provide accessibility modifications.

The township does not presently have any specific project or program planned beyond what has already been constructed and addressed through its COAH certified affordable housing plan to construct or otherwise provide additional units to further address underserved needs.

Other Actions

a) Public Policies.

Since conventional zoning can contain development standards which make the provision of affordable housing cost prohibitive, the enactment of new zoning standards is an important step in any initiative to eliminate barriers to and instead, promote affordable housing. Wayne has enacted such rezoning to promote specific affordable housing developments. In addition, fast track local approvals are planned to assist affordable housing sponsors commence construction more quickly, thereby saving time and money in developing their projects. Wayne has also agreed to provide tax abatement, to the extent permitted by state law, to the senior citizens and handicapped housing developments in order to achieve lowered operating costs and thereby lowering rents.

b) Rental Assistance.

The township provides rental support in the way of subsidy to the Sienna Village senior citizen complex in the amount of \$50,000.00 per year that is payable over a period of 15 years for a total subsidy of \$750,000.00. The township does not provide any other rental assistance program.

The township provides support services for homeless (or potentially homeless) individuals through the staffing of the Welfare Department and allocating funds for assistance which are reimbursed by the State of New Jersey. The township expects that the Welfare Department staff will continue its efforts to assist homeless individuals and that Passaic County will provide services to homeless families. It is important to note that there are not a significant number of people who need assistance of this nature in Wayne, but the township believes that these are important services to provide, even if a small percentage of Wayne's residents are provided with assistance.

The Welfare Department staff continues to participate in educational and training activities to become better equipped to serve the homeless. The department is in the process of computerizing its records and resource material. Maintaining up to date information on the various homeless shelters and food providers in the region is important in providing effective counseling and referrals for those in need.

c) Institutional Structure.

The township will monitor the Planning Department's progress in undertaking these affordable housing programs and assess the need for additional staff. Although the interaction, communication and cooperation among the Planning, Building, Welfare, Finance and Legal (Township Attorney's office) Departments appears adequate to carry out the housing plan, the

current workloads of all departments may dictate the necessity of additional staff whose primary function would be housing related activities alone.

d) Public Housing.

There is no public housing in Wayne Township. The existing senior citizens housing development (Sisco Village) is a NJHMFA financed, HUD mortgage interest subsidized (S-236) development, and is not, as such, "public housing" under the management of a Public Housing Authority. Sisco Village is in good condition and is not expected to be the subject of any major improvements other than ongoing maintenance and normal repairs. The development is privately managed and monitored by the NJHMFA.

e) Lead-Based Paint Hazard Reduction.

The Wayne Health Department will continue to implement lead screening as part of its principal operations and activities. The Department plans to sponsor health fairs and other community-wide educational events to continue to raise these and other health issues to parents. A new display system has been prepared which will assist the Department in these efforts. The Planning Department has specifically added lead-based paint hazard reduction as one of the eligible activities which can be undertaken under the rehabilitation program. A lead-based paint hazard notice has been added to the rehabilitation application package to make homeowners aware of this potential problem. Additionally, all housing rehabilitation projects funded by CDBG funds under the Housing Improvement Program will comply with all Federal Lead Based Paint standards.

The Department is assembling a new display system and anticipates sponsoring health fairs and other outreach efforts in the community, further enabling the effective distribution of information to educate parents about the dangers of lead-based paint. Based on past experience, there is no indication of any significant lead-based paint problem, but these outreach efforts will continue as a preventative mechanism.

f) Anti-Poverty Strategy

The Township of Wayne does not have a specific anti-poverty strategy other than to promote economic development to secure job opportunities for township residents, satisfying its affordable housing requirements under its COAH obligations that provides affordable housing opportunities for township and regional area residents, providing financial assistance (non HUD funded) for the township's senior housing development, and providing general welfare and counseling assistance to income qualified individuals and families. Currently the Welfare Department is supporting fifteen (15) income eligible individuals under its general welfare assistance program.

g) Coordination Efforts.

The township has always had a good relationship with the ownership and management of the one assisted housing development - Sisco Village. The Welfare Department appears to have the most contact with other agencies providing supportive services to those in need. The Director maintains contact with these providers and agencies through volunteer drives and activities and

educational programs. It is likely that the township will develop stronger relationships with housing advocacy groups through its efforts to establish a fair housing complaint and educational outreach program.

CDBG Requirements

a) Displacement.

Wayne Township's community development plan as embodied in this plan and CDBG applications does not contemplate any actions which would result in displacement of persons or households.

b) Low income benefit – All the funds, 100%, of activity funds will be used for activities that benefit low to moderate income persons.

c) Revitalization of Neighborhoods.

The township has undertaken a rehabilitation program to rehabilitate substandard units in Wayne. The program is open to all lower income residents in Wayne and is funded with township funds collected through its affordable housing trust.

d) HOME Investment Trust Funds.

Wayne does not receive any HOME funds.

e) Program Income

Although difficult to predict, the township anticipates receiving \$25,000.00 of program income received from the recapture of mortgage payoffs on homes that had rehabilitation funded through the CDBG program but were sold before the six (6) year forgiveness period. Monies so received will be reprogrammed back into the township's rehabilitation program or alternatively, will be utilized towards addressing the township's affordable housing requirements under the newly formulated COAH Third Round Rules.

The rehabilitation program will completely defer any repayment of the rehabilitation loan for owner occupied housing as long as the resident remains in the unit for at least six years. Landlords of rental housing would be required to repay the rehab funds, but no applications have yet been received from any landlord in Wayne. Monies are used to fund the hard costs of rehabilitation collected from the repayment of recaptured loans made under the CDBG Housing Improvement Program.

Compliance with National Objectives

The Township of Wayne has specifically designed 100% of its activities and its objectives to reflect HUD National Objective of Low-Mod and therefore meets the primary benefit test of 70% to low and moderate income persons.

Conformance with the Consolidated Plan

The use of CDBG funds for all Wayne Township programs is in conformance with the Consolidated Plan submitted to, and approved by HUD in 2005 as detailed in previous sections of this plan.

Public Participation

Public outreach will be conducted in accordance with the township's Citizen Participation Plan. The plan will be duly advertised and published to allow the public a 30 day comment period. Further, a public hearing will be held by the Township on October 31, 2008 at 4 pm in the Planning Department located at 475 Valley Road, Wayne, New Jersey to accept public comments regarding the 2009 Plan and the township's overall management of its CDBG program.

Certifications

- see attached

Monitoring

The Planning Department has the primary responsibility for carrying out CDBG activities. All funds, however, are monitored by the Finance Department and the payment of expenses under the program must be approved by the Municipal Council. Prior to any expenditure, the responsible department head must approve a voucher completed by the vendor. The voucher is checked by the Purchasing Department and forwarded to the Finance Department for inclusion on the bill list for the Council's review and approval. The Planning Department monitors ongoing projects to insure compliance with the township's consolidated plan and applicable programmatic requirements by engaging the various involved departments, formulating appropriate projects in consultation with the public in accordance with its citizen participation plan and then conducting on-site inspections to insure that projects are completed as originally approved and in a timely manner. The Planning Department is aware of the need to expend CDBG monies in a timely fashion. In order to meet HUD requirements for maintaining no more than 1.5 times the amount of funding in any one grant year, drawdown of funds are commenced in September through October with all projects completed and fully funded by the end of the grant year which is December 31st.

A procedural manual for the rehabilitation program has been prepared by the township and approved by Municipal Council and the Court in connection with Wayne's *Mt. Laurel* plan. The procedures call for a bidding process so as to obtain the lowest responsible bid for work to be undertaken. Payment for work is not made until satisfactorily inspected by the Building Department, and the Municipal Council must approve all payments. Progress reports must be filed periodically with the Court to verify that the units are being rehabilitated consistent with the Court-approved plan. Long term compliance with housing codes is achieved by official

inspections by certified housing inspectors who monitor the rehabilitation work to insure that code violations are eliminated. Funding is provided by the township through its housing trust fund in the form of a forgivable mortgage after six years. As part of the filed mortgage document, the homeowner agrees to maintain the property in compliance with code requirements to insure that the property does not revert into disrepair.

Although sub recipient funding is not proposed for this fiscal year action plan, should sub recipients be provided CDBG funding under this grant program at any time in the future, the Planning Department will insure that there is compliance with all programmatic requirements related to sub recipient grantees under 25 CFR Parts 570 Subpart J, Sections 500 through 503 and will enforce all requirements specified there under to insure that funding so provided is properly allocated and spent.

The Planning Department has developed and maintains data on the progress and implementation of the township's housing rehabilitation program and monitors the program's effect on lower income groups of varying levels (low, very low, etc.) as well as racial/ethnic groups, the elderly and the disabled, etc. This data is compiled and reported annually to COAH as part of the township's affordable housing certification requirement.

APPENDIX

1. Newspaper Ads and Notices and Council Resolution

- see attached

2. Summary of Citizen Comments

3. CPD Consolidated Plan Required Documentation

- see attached

4. Project Area Maps