HOUSING ELEMENT AND FAIR SHARE PLAN
FOR THE THIRD ROUND: 1999 - 2025

PREPARED FOR

THE TOWNSHIP OF WASHINGTON
IN THE COUNTY OF GLOUCESTER
STATE OF NEW JERSEY

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Remington & Vernick Engineers, Inc.
232 Kings Highway East
Haddonfield, New Jersey 08033



Joseph M. Petrongolo, L.L.A., R.L.A., P.P.
License #33LI00525100



Ashton G. Jones, P.P., AICP, CFM
License #33LI00633800

N.B. The original of this document was signed and sealed as per N.J.A.C. 13:41-1.3.b

Mayor
Mayor Joann Gattinelli

Township Council
Sean Longfellow, President
Andrea Dougherty, Vice President
Andra Williams
Richard Bennett
Anthony DellaPia

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Mike D'Ariano
Ernie D'Orazio
Edmund Metz
Andrea Dougherty, Council
Mayor Joann Gattinelli
Joe Perry, Alternate 1
Rocco Centrone, Alternate 2

Planning Board Attorney
Timothy Scaffidi, Esquire

Planning Board Professionals
Michael Angelastro, P.E., C.M.E., Engineer
Joseph Petrongolo, L.L.A., R.L.A., P.P., Planner
Richard Fini, P.E., P.P., C.M.E., Environmental Engineer

TABLE OF CONTENTS

PART 1: HOUSING ELEMENT 1

1.0 INTRODUCTION 1

2.0 MUNICIPAL OVERVIEW 2

3.0 BACKGROUND 3

4.0 HOUSING STOCK: OCCUPANCY AND PHYSICAL CHARACTERISTICS 5

4.1 Housing Unit Type 5

4.2 Housing Units by Age 6

4.3 Housing Units by Number of Bedrooms 6

4.4 Substandard Housing Conditions 7

5.0 HOUSING STOCK: VALUE AND AFFORDABILITY 7

5.1 Value of Owner-Occupied Units 7

5.2 Gross Rent 8

5.3 Housing Costs as Percentage of Household Income 9

6.0 SELECTED DEMOGRAPHICS: AGE AND POPULATION, HOUSEHOLD TYPE, HOUSEHOLD SIZE, AND INCOME 10

6.1 Population and age 10

6.2 Households: Type and Size 11

6.3 Household Income 12

6.4 Poverty Rate 12

7.0 EXISTING AND PROBABLE FUTURE EMPLOYMENT 13

7.1 Employment Status 13

7.2 Employment by Industry 13

7.3 Employment by Occupation 14

7.4 Change in Employment 14

7.5 Journey to Work 15

7.6 Available Vehicles by Household 15

7.7 Probable Future Employment Opportunities 16
7.8 Projections 16
8.0. HOUSING STOCK PROJECTION 17
8.1 Building and Demolition Permits by Year 17
9.0 LANDS MOST APPROPRIATE FOR PRODUCTION OF AFFORDABLE HOUSING 18
PART 2: ACHIEVEMENT OF FAIR SHARE 19
1.0 INTRODUCTION 19
2.0 PRESENT NEED (REHABILITATION OBLIGATION): DEFINED, DETERMINED, AND ADDRESSED 19
2.1 As Defined 19
2.2 As Determined 19
2.3 As Addressed 20
3.0 PRIOR ROUND OBLIGATION: 1987 - 1999 21
3.1 Numeric Obligation as Recognized 21
3.2 Prior Round Formulas Having Applicability for Award of Credit 21
3.3 Site Suitability Analysis 22
3.4 Summary of Prior Round 1987 - 1999 Satisfaction 23
3.5 Projects Addressing the Obligation 23
4.0 THIRD ROUND 26
4.1 Numeric Obligation as Recognized 26
4.2 Formulas Having Applicability for Award of Credit 26
4.3 Site Suitability Analysis 26
4.4 Summary of Satisfaction of the Township's Third Round Obligation: 28
4.5 Projects Addressing the Obligation 28
4.6 Third Round Low/Moderate Income Split Chart 37
4.7 Units Approved Post 2008 38
4.8 Very Low-Income Obligation Satisfaction 38

4.9 Bedroom Distribution Chart 39
4.10 Third Round Rental and Family Rental 39
4.11 Third Round Family 39
Map of Affordable Housing Sites 40
Appendix A 41

PART 1: HOUSING ELEMENT

1.0 INTRODUCTION

Under section 40:55D-28 of the Municipal Land Use Law, the Housing Plan Element is to, through incorporation by reference of the provisions of section 52:27D-310 of the Fair Housing Act, be designed to achieve the goal of access to affordable housing to meet present and prospective housing need, with particular attention to very-low, low, and moderate income housing, and shall incorporate elements which are set forth below.

While the Housing Element is not identified under the Municipal Land Use Law as a required element of the Master Plan, it is nonetheless a required element of Washington Township's Master Plan inasmuch as the Township has an adopted zoning ordinance.

Pursuant to N.J.S.A. 40:55D-62(a), a governing body may not adopt or amend a zoning ordinance, until and unless, the planning board would have adopted a Land Use Plan Element and Housing Plan Element of the Master Plan.

Required essential elements of the Housing Element, as set forth under the Fair Housing Act are as follows:

a. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low and moderate income households and substandard housing capable of being rehabilitated, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;

b. A projection of the municipality's housing stock, including the probable future construction of low and moderate income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;

c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;

d. An analysis of the existing and probable future employment characteristics of the municipality;

e. A determination of the municipality's present and prospective fair share for low and moderate income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low and moderate income housing; and

f. A consideration of the lands that are most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a

consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.

This Housing Element and Fair Share Plan has been prepared, following the New Jersey Supreme Court decision decided on March 10, 2015, In re N.J.A.C. 5:96 and 5:97, 221 N.J. 1 (2015) ("Mount Laurel IV"). In this decision, the Supreme Court held that since the Council on Affordable Housing ("COAH") was no longer functioning, trial courts were to resume their role as the forum of first instance for evaluating municipal compliance with Mount Laurel obligations, and also established a transitional process for municipalities to seek a Judgment of Compliance and Repose ("JOR") in lieu of Substantive Certification from COAH.

In response to Mount Laurel IV, Washington Township filed a Declaratory Judgment action, along with a motion for temporary immunity, on July 2, 2015 (hereinafter "DJ Action"). The Court granted the Township's motion, and temporary immunity from all Mount Laurel lawsuits, including builder's remedy lawsuits, is still in full force and effect.

The Court also allowed Fair Share Housing Center ("FSHC") to intervene in the Township's DJ Action, and appointed Philip B. Caton, P.P., F.A.I.C.P. as Special Court Master, who subsequently retired and was replaced by Mary Beth Lonergan, P.P., A.I.C.P.

Eventually, after lengthy settlement negotiations, the Township and FSHC entered into a global Settlement Agreement on June 26, 2019 (hereinafter "June 26, 2019 FSHC Settlement Agreement"). The Court approved the June 26, 2019 FSHC Settlement Agreement at a duly noticed Fairness Hearing, held on October 10, 2019, and entered an Order memorializing its decision on November 12, 2019.

Due to changes in project specific credit allocation, the Township is in the process of amending the June 26, 2019 FSHC Settlement Agreement (hereinafter the "First Amendment" or "First Amendment to the June 26, 2019 FSHC Settlement Agreement"). This Housing Element and Fair Share Plan has been prepared to implement the terms and conditions of the June 26, 2019 FSHC Settlement Agreement and the First Amendment.

2.0 MUNICIPAL OVERVIEW

Washington Township is situated in the northeasterly quadrant of Gloucester County, encompassing an approximate area of 23 square miles, and is bounded to the north by Deptford Township, to the east by Gloucester Township, to the south by Winslow and Monroe Townships, and to the west by Mantua Township, and the Boroughs of Pitman and Glassboro.

The 2010 Census revealed that the Township had a total population of 48,559 persons, which represents a 3.1% increase in the total population as reported by the 2000 Census (47,114 persons). The U.S. Census Bureau 2013-2017 5-Year American Community Survey estimated a total population of 48,119 persons a 0.9% decrease since 2010.

With respect to the State Development and Redevelopment Plan (SDRP), the Township is classified, in nearly equal proportions, as Metropolitan Planning Area (PA1) and Suburban Planning Area (PA2). Areas of the PA1 classification are characterized by mature settlement patterns, a paucity of vacant land, and the need to rehabilitate housing to keep pace with

changing market standards. The SDRP anticipates, for such areas, that redevelopment will be the principal generator of future growth.[1]

Areas having a PA2 classification are typically found adjacent to lands having a PA1 classification but lack the intensity of development found in the PA1 areas. The PA2 areas are characterized by "availability of developable land, and a more dispersed and fragmented pattern of predominately low-intensity development."[2] For these areas, the SDRP anticipates the creation of development patterns with reasonable densities, given the availability of public infrastructure, and "retrofitting" to mean, the redeveloping of existing sprawl."[3]

3.0 BACKGROUND

In 1975, the New Jersey Supreme Court ruled in its landmark decision, now referred to as Mount Laurel I, that developing municipalities have a constitutional obligation to provide a realistic opportunity for the construction of their fair share of the regional need for housing that would be affordable to very-low-, low-, and moderate-income households. The Supreme Court extended the constitutional obligation in its 1983 decision in Mount Laurel II to all municipalities and created a mechanism by which developers and others, if they met certain criteria, could challenge a municipality's zoning and obtain a "builder's remedy."

In 1985, the Legislature enacted the Fair Housing Act, N.J.S.A. 52:27D-301 et. seq., in response to Mount Laurel II. The Fair Housing Act created an administrative entity with primary jurisdiction over compliance with the Mount Laurel doctrine: the Council on Affordable Housing, or COAH. COAH was charged with promulgating regulations, setting forth the information municipalities needed to determine their affordable housing obligations and creating a process by which municipalities can comply with that obligation and be protected from builder's remedy lawsuits.

COAH created its "first round" of regulations and affordable housing obligations to address the period from 1987 through 1993. N.J.A.C. 5:92-1, et. seq. COAH adopted its "Second Round" regulations in 1994, N.J.A.C. 5:93-1.1 et. seq. to cover the housing period from 1993 through 1999. In the "second round" regulations, COAH recalculated the first and second round obligations and created a cumulative fair share obligation from 1986 through 1999, which is now known as a municipality's "Prior Round" obligation.

In December 2004, COAH released its "Third Round" regulations for the period of 1999 through 2014 (N.J.A.C. 5:94-1 et. seq. and N.J.A.C. 5:95-1, et. seq). In 2007, the Appellate Division invalidated key portions of COAH's Third Round regulations and directed the agency to adopt new regulations within six months. COAH issued revised regulations on June 2, 2008, and amended those regulations in October of 2008, and extended the Third Round to include 1999 through 2018.

On July 17, 2008, Governor Corzine signed P.L.2008, c.46, which provided amendments to the FHA which, among other things:

[1] The New Jersey State Development and Redevelopment Plan, adopted March 1, 2001, p. 188.
[2] Ibid., p. 194.
[3] The State Plan, p. 196.

- Established a statewide 2.5% nonresidential development fee instead of requiring nonresidential developers to provide affordable housing.
- Eliminated RCAs as a means available to municipalities to transfer up to 50% of their required affordable housing to a "receiving" municipality.
- Added a requirement that 13% of all affordable housing units be restricted to very low-income households (earning 30% or less of median income).

In 2010, the Appellate Division again invalidated portions of COAH's Third Round regulations, in particular its growth share methodology, and directed COAH to create new, third round obligations using methods similar to the prior round.

In 2013, the Supreme Court upheld the Appellate Division's 2010 decision, and directed COAH to promulgate new regulations consistent with that opinion. After delays and COAH's inability to adopt new regulations by the Supreme Court's deadline, FSHC filed a Motion in Aid of Litigant's Rights with the Supreme Court.

On March 10, 2015, the Supreme Court issued its ruling on FSHC's Motion, in Mount Laurel IV, where the Supreme Court determined that COAH had ceased to properly function, and that municipalities needed a means by which to comply with their constitutional obligations to provide affordable housing and for the rights of very-low-, low-, and moderate-income households to be vindicated.

The Supreme Court transferred jurisdiction to the trial courts to designate Mount Laurel judges, and appoint Special Masters to assist them in processing municipal Housing Element and Fair Share Plans. The Supreme Court also directed the trial courts to process these cases in the same manner as COAH had done. When a Court approves a municipality's Housing Element and Fair Share Plan, the municipality receives a Judgment of Compliance and Repose, which is the court's equivalent to COAH's Substantive Certification.

Mount Laurel IV also established a 90-day transitional period, and then a 30-day filing period between June 8 and July 8, 2015 for municipalities to file a Declaratory Judgment Action in Superior Court, Law Division seeking confirmation that their means of addressing affordable housing meets constitutional muster. Municipalities were also permitted to seek an order granting "temporary immunity" from all Mount Laurel lawsuits, including those seeking a builder's remedy. Washington Township timely filed its new Declaratory Judgment Action on July 2, 2015, and thereafter secured another extension of its immunity which remains in full force and effect today.

While Washington Township, and many others around the state, were dependent upon a set number to create their Fair Share Housing Plans from, there was an absence of a finalized number and set of regulations or rulings to guide the Township, aside from the 2014 COAH fair share allocation numbers. In July 2015, David Kinsey, P.P., F.A.I.C.P. on behalf of FSHC prepared a report (hereinafter the "Kinsey Report") which not only defined every municipality's affordable housing obligation but defined the prospective need as the need for the period 1999 through 2025.

Washington Township entered into a Shared Services Agreement ("SSA") along with over 200 other New Jersey municipalities to retain Rutgers University so that Dr. Burchell could

prepare an expert report that would contain fair share calculations for specific municipalities, which was due to be completed by September 30, 2015.

Unfortunately, before Dr. Burchell finalized a draft of his report, he suffered a stroke on or about July 27, 2015, and on September 11, 2015, Rutgers University terminated the contract pursuant to which Dr. Burchell was doing this work.

In an effort to address this unforeseen problem, the consortium of municipalities entered into a contract with Econsult to prepare a second report (the "Solutions Report"), which calculated fair share obligations for all of the municipalities in the state.

Since the initial drafting of both the Kinsey and Econsult reports, both parties have drafted subsequent reports, based on Court decisions regarding the so-called gap period, the period between the end of COAH's Second Round rules and the start of this current Court driven process.

Over the course of the next two years, FSHC, municipalities, and the New Jersey Builders Association developed competing expert reports for purposes of calculating the statewide need and allocating that need among New Jersey municipalities. After a 40-day trial in Mercer County, on March 8, 2018, Honorable Mary C. Jacobson, A.J.S.C. issued a 217-page opinion which, among other things, provided the methodological roadmap for calculating "prospective" need obligations for the 16-year period between 1999 and 2025.

The affordable housing obligation numbers used in this Housing Element and Fair Share Plan are numbers that were agreed upon between FSHC and the Township in the June 26, 2019 FSHC Settlement Agreement.

A Fairness Hearing was conducted on October 10, 2019, and the Township's affordable housing obligations were affirmed in the Special Master's report entitled "Master's Report on a Settlement Agreement and Preliminary Compliance Determination for a Mount Laurel Fairness Hearing, Township of Washington, Gloucester County, New Jersey." The Court entered an Order on November 12, 2019 approving the June 26, 2019 FSHC Settlement Agreement, the Township's affordable housing obligations and preliminarily approving the Township's proposed compliance techniques for addressing its affordable housing obligations.

4.0 HOUSING STOCK: OCCUPANCY AND PHYSICAL CHARACTERISTICS

4.1 Housing Unit Type

Washington Township has a total of 17,852 housing units. As indicated in Table 1 below, 14,125 are owner-occupied, 2,896 are renter-occupied and 831 are vacant. 83% of the occupied units are owner-occupied, while the other 17% are rented. At 72% of the total housing stock, single family dwellings account for the overwhelming majority of housing in the Township. Rentals predominate in more dense multi-family developments (5 or more attached units) where 68.3% of renters live. A third of renters live in buildings with 20 or more units. As more Redevelopment Plans are implemented throughout the Township, higher density housing has become more commonplace.

Table 1: Units in Structure

Housing Units	Owner Occupied	Percent of Total Owner Occupied	Renter Occupied	Percent of Total Renter Occupied	Vacant	Total
1, detached	12,169	86.2%	338	11.7%	411	12,918
1, attached	977	6.9%	278	9.6%	82	1,337
2	51	0.4%	119	4.1%	0	170
3 or 4	228	1.6%	139	4.8%	0	36
5 to 9	559	4.0%	533	18.4%	180	1,272
10 to 19	38	0.3%	473	16.3%	64	575
20 or more	39	0.3%	972	33.6%	94	1,105
Mobile home	64	0.5%	44	1.5%	0	108
Total	14,125	79.1%	2,896	16.2%	831	17,852

Source: Table B25032: Tenure by Units in Structure, ACS 2013-2017

4.2 Housing Units by Age

Table 2 below groups the Township's housing units by when they were built. 52% were constructed between 1970 and 1989 during which time housing construction peaked. Since then, development has slowed significantly. The median year of housing unit construction in the Township (1982) falls well within this 20-year time period. An area of potential concern is that, if not maintained properly, the 3,755 units built over 50 years ago (21% of the total) could become a blighting influence (see Section 4.4 below).

Table 2: Year Structure Built

Year Built	Number	Percent	Owner	Renter	Vacant
Built 2014 or later	44	0.2%	15	0	29
Built 2010 to 2013	66	0.4%	54	12	0
Built 2000 to 2009	1,672	9.4%	1,406	174	92
Built 1990 to 1999	2,997	16.8%	2,485	454	58
Built 1980 to 1989	4,912	27.5%	4,038	658	216
Built 1970 to 1979	4,406	24.7%	3,261	871	274
Built 1960 to 1969	2,530	14.2%	2,013	489	28
Built 1950 to 1959	838	4.7%	547	175	116
Built 1940 to 1949	148	0.8%	120	10	18
Built prior to 1940	239	1.3%	186	53	0
Total	17,852	100%	6,025	2,525	831
Median Year Built	1982				

Sources: Table B25036: Tenure by Year Structure Built, ACS 2013-2017; Table B25037: Median Year Structure Built by Tenure, ACS 2013-2017

4.3 Housing Units by Number of Bedrooms

As shown in Table 3 below, the bulk of Washington Township's housing units have at least three bedrooms (72.2%). Of these, four bedrooms (39.4%) is the most common configuration. This percentage is significantly higher than the percentage of 4-bedroom units in the county as a whole (27.1%). Conversely, the percentage of 3-bedroom units in the county as a whole (39%) is significantly higher than the percentage of 3-bedroom units in the Township (28.6%).

Table 3: Bedrooms per Housing Unit

Bedrooms	Washington Township	Percent of Total	Gloucester County	Percent of Total
No bedroom	303	1.7%	1,396	1.2%
1 bedroom	1,029	5.8%	8,821	7.8%
2 bedrooms	3,631	20.3%	23,507	20.9%
3 bedrooms	5,114	28.6%	43,877	39.0%
4 bedrooms	7,028	39.4%	30,505	27.1%
5 or more bedrooms	747	4.2%	4,410	3.9%
Total	17,852	100.0%	112,516	99.9%*

Source: Table DP04 Selected Housing Characteristics, ACS 2013-2017
*Due to rounding, the total does not equal 100%

4.4 Substandard Housing Conditions

Indicators of Housing Deficiency include lack of plumbing or kitchen facilities, overcrowding, and housing built more than 50 years ago. When combined, these metrics can be used by municipalities to determine the amount of housing that could qualify for rehabilitation and support efforts to provide affordable housing through renovations of existing housing units.

As shown in Table 4 below, of the Township's 3,755 housing units that are at least 50 years old, only 10 are considered crowded or overcrowded, and the same number of units lack complete plumbing. However, nearly 9% (332 units) lack complete kitchens. The American Community Survey (ACS) estimate indicates that the percentage of substandard units, as defined by these metrics, approximates conditions found countywide.

Plumbing Facilities – Complete plumbing facilities include hot and cold piped water, a flush toilet, and a bathtub or shower, all three of which must be located inside the unit.

Kitchen Facilities – Complete kitchen facilities include a sink with piped water, a range or cooktop and oven, and a refrigerator, all three of which must be located inside the unit.

Table 4: Indicators of Housing Deficiency

Indicator	50+ Years Old	Incomplete Plumbing	Incomplete Kitchen	Crowded or Overcrowded, and built pre 1950
Number of Units	3,755	10	332	10

Sources: Table B25050 Plumbing Facilities by Occupants Per Room By Year Structure Built, ACS 2013-2017; Table B25051: Kitchen Facilities for All Housing Units, ACS 2013-2017; Table B25034 Year Structure Built, ACS 2013-2017

5.0 HOUSING STOCK: VALUE AND AFFORDABILITY

5.1 Value of Owner-Occupied Units

As indicated in Table 5 below, the median value of the Township's owner-occupied housing units has increased by nearly $100,000 since the 2000 census, rising from $140,700 to $240,300 in 2017. While the bulk of the housing values had been in the $100,000- $174,999

range, they are now mainly in the $200,000-$299,999 range. This rapid increase in value during this time period, has far outstripped the rate of inflation, and reflects a strong demand for housing in the Township.

Table 5: Value of Owner-Occupied Units

Housing Unit Value	2017 Units	Percent	2000 Units	Percent
Less than $50,000	417	3.0%	45	0.3%
$50,000 to $59,999	22	0.2%	48	0.4%
$60,000 to $69,999	9	0.1%	129	1%
$70,000 to $79,999	15	0.1%	300	2.4%
$80,000 to $89,999	57	0.4%	578	4.6%
$90,000 to $99,999	115	0.8%	484	3.9%
$100,000 to $124,999	705	5.0%	2,329	18.7%
$125,000 to $149,999	676	4.8%	3,683	29.6%
$150,000 to $174,999	983	7.0%	1,940	15.6%
$175,000 to $199,999	1,453	10.3%	1,140	9.2%
$200,000 to $249,999	3,238	22.9%	1,087	8.7%
$250,000 to $299,999	2,989	21.2%	362	2.9%
$300,000 or more	3,446	24.4%	316	2.6%
Total	14,125	100.0%	12,441	99.9%
Median	$240,300		$140,700	

Sources: QT-H14 Value, Mortgage Status, and Selected Conditions, 2000; B25075: Value, ACS 2013-2017; B25077: Median Value, Owner Occupied Housing Units, ACS 2013-2017

5.2 Gross Rent

Washington Township's median household income was $91,149.[4] Moderate-income standards require a household's income to be 50%-80% of an area's median income, and low-income standards are defined as below 50% of an area's median income. Based on these standards, a moderate-income household in Washington Township earns between $45,574 and $72,919, and low-income households earn less than $45,574 annually. According to The U.S. Department of Housing and Urban Development (HUD), households should not pay more than 30% of their income for housing. Applying this parameter to Washington Township, affordable moderate-income rents should range from $1,139 to $1,823, and affordable low-income rents should not exceed $1,139.36.

As indicated in Table 6, Washington Township renters pay more than the county's renters as a whole. Thus, while 78.9% of the Township's rental units are priced at or over $1,000/month, only 64.6% of the county's rental units are priced accordingly. Moreover, at $1,208, the median rent for Washington Township exceeds the $1,134 median rent for the county.

[4] As reported by the ACS 2013-2017

Table 6: Gross Rent

Gross Rent	Units in Washington Township	Percent	Units in Gloucester County	Percent
Less than $100	0	0.0%	30	0.1%
$100 to $149	10	0.3%	72	0.3%
$150 to $199	14	0.5%	134	0.6%
$200 to $249	7	0.2%	288	1.3%
$250 to $299	0	0.0%	154	0.7%
$300 to $349	0	0.0%	171	0.8%
$350 to $399	19	0.7%	123	0.6%
$400 to $449	22	0.8%	279	1.3%
$450 to $499	9	0.3%	362	1.7%
$500 to $549	0	0.0%	195	0.9%
$550 to $599	0	0.0%	216	1.0%
$600 to $649	0	0.0%	316	1.5%
$650 to $699	24	0.8%	236	1.1%
$700 to $749	25	0.9%	417	2.0%
$750 to $799	42	1.5%	462	2.2%
$800 to $899	187	6.5%	1,866	8.7%
$900 to $999	212	7.3%	2,246	10.5%
$1,000 to $1,249	976	33.7%	5,049	23.6%
$1,250 to $1,499	611	21.1%	3,434	16.1%
$1,500 to $1,999	432	14.9%	3,002	14%
$2000 or more	179	6.2%	1,489	7.0%
No cash rent	127	3.0%	838	3.9%
Total	2,896	100%	21,379	100%
Median Rent	$1,208		$1,134	

Sources: Table B25063 Gross Rent, ACS 2013-2017; Table B25064 Median Gross Rent (Dollars), ACS 2013-2017

5.3 Housing Costs as Percentage of Household Income

That the percentage of monthly household income dedicated to housing costs is a measure of affordability is reinforced by the HUD policy cited above, i.e., households should not spend more than 30% of their income on housing. This metric, however, applies to affordable rental units only. In the case of mortgaged property, an affordable unit is one in which monthly housing expenses (principal and interest) do not exceed 28% of monthly household income.

In Washington Township, 52.6% of renter households pay at least 30% of their annual income on housing, compared to only 29.2% of homeowners who do. Overall, 62.6% of Township households pay less than 30% of their annual income towards housing. Increasing housing prices have resulted in 31.6% of households paying more on housing than is recommended.

Table 7: Selected Monthly Owner Costs as a Percentage of Household Income (SMOCAPI)

Monthly Housing Costs as Percent of Income	Owner Occupied	% of Total	Renter Occupied	% of Total	All Occupied	% of Total
Less than 20 Percent	6,040	42.8%	705	24.3%	6,745	37.8%
20 to 29 Percent	3,891	27.5%	534	18.4%	4,425	24.8%
30 Percent or more	4,121	29.2%	1,524	52.6%	5,645	31.6%
Total	14,052	99.5% *	2,763	95.4% *	17,021	94.2% *

Source: Table S2503 Financial Characteristics, ACS 2013-2017

*Remaining percentage has zero or negative income or paid no cash rent.

6.0 SELECTED DEMOGRAPHICS: AGE AND POPULATION, HOUSEHOLD TYPE, HOUSEHOLD SIZE, AND INCOME

6.1 Population and age

As shown in Table 8 below, Washington Township's population increased modestly from 2000 to 2017. Thus, a 3.1% increase from 2000 to 2010 preceded a -0.9% reduction in the following seven years. In contrast, the county as a whole experienced 13.2% and 1.1% increases during these two time periods, respectively.

Table 8: Population Change

Location	2000	2010	% Change	2017	% Change
Washington Township	47,114	48,559	3.1%	48,119	-0.9%
Gloucester County	254,673	288,288	13.2%	291,372	1.1%

Sources: U.S. Census 2000, 2010; Table B01003 Total Population, ACS 2013-2017

From 2010 to 2017, the median age of Washington Township residents increased by one year from 40.6 to 41.6. Although it merely reflects a modest aging of the overall population, many of the older age cohorts, in particular those over 64 years (See Table 9 below), experienced much larger increases. The age cohorts that experienced the biggest losses in the 2010-2017 time period were the 15-19, 40-44- and 45-49-year groupings. There are also fewer children in Washington Township, as reflected by an average 16% reduction in the 5-9, 10-14, and 15-19 age cohorts since 2010.

Table 9: Total Population by Age 2010 and 2017

Age in Years	Number in 2010	Percent	Number in 2017	Percent	Percent Change 2010-2017
Under 5 years	2,410	5.0%	2,516	5.2%	4.4%
5 to 9 years	3,164	6.5%	2,754	5.7%	-13.0%
10 to 14 years	3,636	7.5%	3,176	6.6%	-12.7%
15 to 19 years	3,760	7.7%	2,879	4.9%	-23.4%
20 to 24 years	3,073	6.3%	3,232	6.7%	5.2%
25 to 29 years	2,573	5.3%	3,271	6.7%	27.1%
30 to 34 years	2,401	4.9%	2,748	6.4%	14.5%
35 to 39 years	2,851	5.9%	2,728	5.7%	-4.3%
40 to 44 years	3,580	7.4%	2,785	6.7%	-22.2%
45 to 49 years	4,210	8.7%	3,461	6.4%	-17.8%
50 to 54 years	4,141	8.5%	3,893	7.0%	-6.0%
55 to 59 years	3,683	7.6%	3,729	7.5%	1.2%
60 to 64 years	3,029	6.2%	3,076	8.1%	1.6%
65 to 69 years	2,042	4.2%	2,814	6.8%	37.8%
70 to 74 years	1,298	2.7%	1,730	3.9%	33.3%
75 to 79 years	1,051	2.2%	1,232	2.9%	17.2%
80 to 84 years	841	1.7%	1,024	1.6%	21.8%
85 years and over	816	1.7%	1,071	2.2%	31.3%
Total	48,559	100.0%	48,119	100%	-0.9%
Median Age	40.6 years		41.6 years		

Sources: Table B01001: Sex by Age, ACS 2013-2017; Table B01002; Median Age by Sex, ACS 2013-2017; Census DP-I

6.2 Households: Type and Size

Households can be categorized by type and size. In Washington Township, 76.8% of all households are considered family households (see Table 10 below), while 23.2% are non-family households. With an average of 3.27 persons, family households are larger than the average household size of 2.81 persons. Of the total households in the Township, 19.8% consist of the householder living alone.

Table 10: Household Type

Household Type	Number of Households	Percent of Total Households
Family Households	13,069	76.8%
Married-couple family	10,669	62.7%
With Children	4,343	25.5%
With no children	6,327	37.2%
Male Householder, no spouse parent	710	4.2%
With own children under 19	238	1.4%
Without own children under 19	472	2.8%
Female Householder, no spouse parent	1,690	9.9%
With own children under 19	825	4.8%
Without own children under 19	865	5.1%
Nonfamily households	3,952	23.2%
Householder living alone	3,375	19.8%
Total Households	**17,021**	**100.0%**
Average household size	**2.81**	
Average family size	**3.27**	

Source: Table DP02 Selected Social Characteristics, ACS 2013-2017

6.3 Household Income

As measured by household income, Washington Township is wealthier than the county as a whole. As shown in Table 5.3 below, median household income in the Township is $91,149 which is nearly $10,000 more than that of the county. Over 60% of Township households earn more than $75,000 annually which places a majority of them above the $72,919 floor that defines low- and moderate-income households.

Table 11: Household Income Level in the Past Year (In 2013 Inflation-Adjusted Dollars)

Household Income	Households	Percent
Less than $10,000	449	2.6%
$10,000 to $14,999	434	2.5%
$15,000 to $24,999	759	4.5%
$25,000 to $34,999	827	4.9%
$35,000 to $49,999	1,575	9.3%
$50,000 to $74,999	2,628	15.4%
$75,000 to $99,999	2,691	15.8%
$100,000 to $149,999	3,886	22.8%
$150,000 to $199,999	2,135	12.5%
$200,000 or more	1,637	9.6%
Total	17,021	99.9%
Median Income	$91,149	

Source: Table DP03 Selected Income Characteristics, ACS 2013-2017

6.4 Poverty Rate

The poverty rates in Washington Township for both families and individuals are significantly lower than the corresponding rates for the county. At 2.5%, the Township's poverty rate for families is less than half of the 5.3% rate for the county. Similarly, the Township's poverty rate for individuals is less than half of the rate for the county.

Table 12: Individual and Family Poverty Rates

Location	Families	Individuals
Washington Township	2.5%	3.7%
Gloucester County	5.3%	7.9%

Source: Table DP03 Selected Economic Characteristics, ACS 2013-2017

7.0 EXISTING AND PROBABLE FUTURE EMPLOYMENT

7.1 Employment Status

The employment status of Washington Township's labor force mirrors that of the county as a whole. As indicated in Table 13 below, the percentage of the Township's civilian labor force that is employed (63.3%) is nearly identical to the percentage for the county (62.4%), while the unemployment rate is the same for both (5%).

Table 13: Employment Status

	Washington Township		Gloucester County	
	Number	Percent	Number	Percent
In labor force	26,642	68.3%	157,549	67.5%
Civilian labor force	26,619	68.3%	157,464	67.5%
Employed	24,678	63.3%	145,749	62.4%
Unemployed	1,941	5.0%	11,715	5.0%
Armed Forces	23	0.1%	85	0.0%
Not in labor force	12,356	31.7%	75,842	32.5%
Population 16+ yrs	38,998	100.0%	233,391	100.0%

Source: Table B23025 Selected Economic Characteristics, ACS 2013-2017

7.2 Employment by Industry

At 29.1% of employed residents, "Educational Services, Health Care and Social Assistance Services" is by far the largest employer category in the Township (see Table 14 below); a distant second at 12% is "Retail Trade", followed closely by "Professional, scientific and management" at 10.6%. All other categories are in the single digits.

Table 14: Employment by Industry

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	11	0.0%
Construction	1,646	6.7%
Manufacturing	1,655	6.7%
Wholesale trade	934	3.8%
Retail trade	2,966	12.0%
Transportation and warehousing, and utilities	1,230	5.0%
Information	498	2.0%
Finance and insurance, and real estate and rental and leasing	2,100	8.5%
Professional, scientific, and management, and administrative and waste management services	2,620	10.6%
Educational services, health care and social assistance	7,180	29.1%
Arts, entertainment, and recreation, and accommodation and food services	1,694	6.9%
Other services, except public administration	1,029	4.2%
Public administration	1,115	4.5%
Civilian employed population 16 years and over	24,678	100.0%

Source: Table DP03 Selected Economic Characteristics, ACS 2013-2017

7.3 Employment by Occupation

Another way to view a workforce is by separating it into occupation groups (see Table 15 below). More employed residents work in "Management, Business, Science, and Arts Occupations" (11,221, or 45.5%) than in any other group, followed by "Sales and Office Occupations" at 6,526 employed residents (26.4%). Natural Resources, Construction, and Maintenance is the smallest occupation classification in the Township, accounting for only 7.1% of the labor force.

Table 15: Distribution of Employment by Occupation

OCCUPATION	Number	Percent
Management, business, science, and arts occupations	11,221	45.5%
Service occupations	3,223	13.1%
Sales and office occupations	6,526	26.4%
Natural resources, construction, and maintenance occupations	1,756	7.1%
Production, transportation, and material moving occupations	1,952	7.9%
Civilian employed population 16 years and over	24,678	100.0%

Source: Table DP03 Selected Economic Characteristics, ACS 2013-2017

7.4 Change in Employment

The NJ Department of Labor and Workforce Development tracks covered employment throughout the State. As "Covered employment" includes only those jobs for which unemployment compensation is paid, by definition it does not cover public employees, the self-employed, unpaid family workers, most part-time or temporary employees, and only some agricultural and in-home domestic workers. It also indicates covered jobs by location of the employer, as opposed to Tables 14 and 15, which examine employed residents of Washington Township. Table 16 below sets forth the average annual number of private sector establishments and employees that exist within the Township. In 2010, the Township had the highest average amount of employers at 624. Although the average amount of employers has decreased over the past decade to 597, the average number of jobs available within the Township has increased over that time period.

Table 16: Average Annual Number of Establishments and Employees

Year	Total Number of Jobs	
	Units	Employment
2010	624	8,568
2011	598	8,683
2012	582	8,953
2013	566	8,948
2014	575	8,890
2015	580	9,046
2016	595	9,250
2017	597	9,357
2018	597	9,617

Source: NJ Department of Labor and Workforce Development

As Table 17 below shows, the unemployment rate for Washington Township has steadily decreased from 2011 to 2018, reflecting the recovery from the recession in the late 2000's. Although a steadily declining unemployment rate since 2011 is a positive indicator of the Township's economy, employment has remained virtually unchanged since 2010 at just under 24,000

Table 17: Employment Status

Year	Labor Force	Employment	Unemployment	Unemployment Rate
2010	25,964	23,774	2,190	8.4%
2011	25,851	23,606	2,245	8.7%
2012	25,653	23,492	2,161	8.4%
2013	25,376	23,418	1,958	7.7%
2014	24,776	23,212	1,564	6.3%
2015	24,889	23,624	1,265	5.1%
2016	25,075	24,008	1,067	4.3%
2017	25,048	24,045	1,003	4.0%
2018	24,744	23,844	900	3.6%

Source: Table DP03 Selected Economic Characteristics, ACS 2013-2017

7.5 Journey to Work

As Table 18 below shows, 85.1% of Washington Township residents drive alone to work, which is slightly lower than the 85.6% rate for the county. As transit options in Washington Township and Gloucester County are more limited than in other municipalities and counties in metropolitan regions of New Jersey, it is not surprising that transit is rarely used by Township and other residents of Gloucester County to reach their workplaces.

Table 18: Journey to Work

Mode	Washington Township	Gloucester County	New Jersey
Drive alone	85.1%	85.6%	71.5%
Carpool	6.1%	6.4%	8.0%
Transit	2.7%	2.3%	11.5%
Walk	1.2%	1.3%	3.0%
Other	0.8%	1.2%	1.8%
Work at home	4.1%	3.3%	4.2%
Average Travel Time	32 minutes	29.9 minutes	31.5 minutes

Source: Table DP03 Selected Economic Characteristics, ACS 2013-2017

7.6 Available Vehicles by Household

That nearly two-thirds of Washington Township households own two or more vehicles is a reflection of the car-oriented nature of the community (see Table 19 below). Because of the lack of density in many areas of the Township, most destinations require a vehicular trip.

Table 19: Available Vehicles by Household

Vehicles Available	Count	Percent
None	1,003	5.9%
One	4,371	25.7%
Two	7,161	42.1%
Three or more	4,486	26.4%

Source: Table DP04 Selected Housing Characteristics, ACS 2013-2017

7.7 Probable Future Employment Opportunities

The Delaware Valley Regional Planning Commission (DVRPC) is the federally funded Metropolitan Planning Organization (MPO) for the Greater Philadelphia Region, which includes Gloucester County. The DVRPC projects that the region will have gained over 373,000 jobs from 2015 to 2045, with the largest growth share to occur in Gloucester County, NJ (32.2%), much of which will be concentrated in suburban areas similar to Washington Township, and that employment in the four New Jersey counties within the organization's jurisdiction will grow by 9.8%.[5] The DVRPC also projects a population increase of 658,000 residents by 2045 with the largest population increases expected in Gloucester and Chester Counties (29.1% and 28.4%, respectively).[6]

Also, it is reasonable to assume that within Washington Township, future employment and population growth will emanate from redevelopment activity within the Delsea Drive corridor and in those areas extending northward along Blackwood-Barnesboro Road which are subject to the provisions of the Township's Delsea Drive Redevelopment Plan. This Plan promotes (i) planned development of neighborhood commercial, highway service, and office uses within sections referred to as Nodes; (ii) within Core areas, the same type of planned development as preferred for the Nodes as well as a mix of commercial and townhouse residential development; and (iii) within areas outside of Cores and Nodes, planned development along the Delsea Drive corridor and, for areas west of the corridor, expansive warehousing, distribution, and light industrial uses. Finally, it is also likely that future employment growth will result from mixed-use redevelopment activity in the Township's Washington Square Redevelopment Area, which is encompassed by Fries Mill Road, Hurffville-Cross Keys Road, Tuckahoe Road, and Route 42. The Redevelopment Plan establishes three 'areas' within the Redevelopment Zone, to promote coordinated, efficient, and balanced growth.

7.8 Projections

According to DVRPC's published population and employment projections for the years 2015-2045, Washington Township's population and employment will increase moderately, albeit at rates significantly slower than those for the county. Thus, as Table 20 shows, the Township's population and employment will grow by the similar rates of 15.7% and 16%, respectively. However, these rates are half the rates of population and employment growth forecast for the county. In addition, none of this, of course, accounts for the current drop in employment due to recent Federal and State government actions related to the COVID-19 pandemic, which will impact employment rates statewide for the foreseeable future.

[5] Delaware Valley Regional Planning Commission, Regional, County, and Municipal Employment Forecasts, October 2016, p. 3.
[6] Delaware Valley Regional Planning Commission, Regional, County, and Municipal Population Forecasts, July 2016, p. 5.

Table 20: Population and Employment Projections, DVRPC

	Washington Township				Gloucester County			
	2015	2045	Change	Percent Change	2015	2045	Change	Percent Change
Population	47,862	55,366	7,504	15.7%	291,479	376,308	84,829	29.1%
Employment	19,175	22,242	3,067	16.0%	121,382	156,686	35,304	32.2%

Source: DVRPC Population and Employment Forecasts, 2015-2045

8.0. HOUSING STOCK PROJECTION

8.1 Building and Demolition Permits by Year

The Fair Housing Act requires that Housing Plans include a 10-year projection of new housing units based on the number of building permits, development applications approved, and probable developments, as well as other indicators deemed appropriate. As Table 21 below shows, annual building permit issuance in Washington Township from 2000 through 2018 averaged 105 units, while annual demolition permit issuance averaged four units. Assuming these rates remains relatively constant, the Township may see a net increase of 1,007 new dwellings by the year 2028. Factors such as the business cycle and physical obstacles to development may result in a lower or higher number.

In terms of residential growth, for the period January 2000 through December 2018, the Township issued building permits authorizing the development of 1,990 units.[7] As can be seen from the below table, the bulk of this activity (88.9%) occurred in the years 2000 to 2003. For the period 2008 to 2018, the Township issued permits authorizing 372 units, being 18.7% of the total for the 18-year period, which equates to an average of 37.2 housing units authorized per year.

Table 21: Housing Unit Building and Demolition Permits by Year

Year	Units Building Permits Issued For	Units Demolition Permits Issued For	Net Difference
2000	450	8	442
2001	517	2	515
2002	366	9	357
2003	120	9	111
2004	68	11	57
2005	66	8	58
2006	13	12	1
2007	18	1	17
2008	7	4	3
2009	3	0	3
2010	1	0	1
2011	0	1	-1
2012	4	3	1
2013	2	8	-6
2014	0	0	0
2015	0	0	0

[7] New Jersey Department of Community Affairs (DCA) Construction Reporter, www.state.nj.us/dca/divisions/codes/reporter, accessed July 13, 2015.

Year	Units Building Permits Issued For	Units Demolition Permits Issued For	Net Difference
2016	0	0	0
2017	308	0	308
2018	47	0	47
Average	105	4	101
5-Year Projection	523.5	20	503.5

Source: NJDCA Construction Reporter, Housing Units Authorized by Building Permits, Housing Units Demolished

9.0 LANDS MOST APPROPRIATE FOR PRODUCTION OF AFFORDABLE HOUSING

Washington Township's preference is for affordable housing to be provided throughout the municipality by numerous private sector initiatives so as to achieve a seamless integration of affordable and market rate housing. Specifically, tracts of land within the Delsea Drive and the Washington Square Redevelopment Areas are most appropriate for the development of affordable housing for the following reasons: (i) issues relating to production of affordable housing may be resolved more readily through redeveloper agreement negotiations, and (ii) the emphases of the Redevelopment Plans on mixed-use development, availability of supporting infrastructure, and location on principal roadways render these Redevelopment Areas suitable for affordable housing.

PART 2: ACHIEVEMENT OF FAIR SHARE

1.0 INTRODUCTION

This Fair Share Plan (*hereinafter* Plan) sets forth Washington Township's Present Need (Rehabilitation Obligation), Prior Round Obligation (1987-1999), and its Third Round Obligation.

The Plan addresses the affordable housing obligation set forth in the June 26, 2019 FHSC Settlement Agreement as amended, which is discussed in further detail above.

As a result of the settlement, the Township's Rehabilitation Obligation is 127, the Township's Prior Round Obligation (1987-1999) is 507 and the Township's Gap (1999-2015) + Prospective Need (2015-2025) or Third Round obligation is 925.

2.0 PRESENT NEED (REHABILITATION OBLIGATION): DEFINED, DETERMINED, AND ADDRESSED

2.1 As Defined

As diagramed in N.J.A.C. 5:93-2.1, Present Need was determined by the addition of indigenous need (to mean deficient housing units occupied by low and moderate income households within a municipality) and reallocated Present Need (to mean that portion of a housing region's Present Need that is redistributed throughout the housing region).

Under the Second Round rules, surrogates evidencing deficient housing included: year structure built, persons per room, plumbing facilities, kitchen facilities, heating fuel, sewer service, and water supply.[8] T

he Third Round rules reduced the number of surrogates evidencing deficient housing to three: crowded units pre-1950, to mean units having more than 1.0 persons per room; incomplete plumbing, and incomplete kitchen facilities.[9] This reduction in the number of surrogates was found, by the Appellate Division, to be within the Council's discretion and was upheld in the Supreme Court's decision Mount Laurel IV.

Pursuant to the above cited Supreme Court decision, reallocated need is no longer a component in the determination of Present Need, so that now Present Need equates to indigenous need, to mean that this component of the obligation is based on deficient housing as determined by crowded units pre-1950, incomplete plumbing, and incomplete kitchen facilities.

2.2 As Determined

As discussed above, the Township accepts as the Present Need, the number promulgated by the Settlement Agreement between the Township of Washington and the FSHC. The

[8] N.J.A.C. 5:93, Appendix A, Present Need.
[9] N.J.A.C. 5: 97, Appendix B, Tables.

Settlement Agreement sets Washington Township's Present Need (Rehabilitation Obligation) at 127.

2.3 As Addressed

For the satisfaction of Present Need (Rehabilitation Obligation), Washington Township is able to claim credits resulting from: (i) participation in the Gloucester County Owner Occupied Rehabilitation Program, and (ii) credits resulting from the establishment of a Township sponsored rental rehabilitation program, by way of a contractual agreement with TRIAD Associates.

The Gloucester County Owner Occupied Rehabilitation Program is administered by the Gloucester County Planning Division and is funded by the United States Department of Housing and Urban Development (HUD). For income eligible households, the program provides 0% per annum, simple interest deferred loans up to $25,000 for the repair of major housing systems. As defined at N.J.A.C. 5:93-5.2(b), major systems include: "weatherization, a roof, plumbing, (including wells), heating, electricity, sanitary plumbing (including septic systems) and/or a load bearing structural system."

Upon completion and acceptance of the work, a lien in the amount of the loan is placed against the property which is typically satisfied at the time of transfer of title or, in the alternative, on the occasion of the death of the individual who received the loan. Affordability controls are also placed on each unit.

The Township actively encourages participation in the County program. The Rehabilitation - Unit Information Report, prepared by the Township's rehabilitation administrator, TRIAD, indicates the rehabilitation of 25 units subsequent to April 1, 2010, at a total cost of $256,841.00. Said total rehabilitation cost averages to $10,273.64 per project, well exceeding the minimum per unit hard costs of $10,000 per N.J.A.C. 5:97-6.2(b)2. Thusly, the Township is able to claim 25 rehabilitation credits through the Gloucester County Owner-Occupied Rehabilitation Program.

In addition, the Township and Triad Associates ("TRIAD") have established a local program for the rehabilitation of both ownership and rental units, since the County program does not provide for the rehabilitation of rental units, which type units are to be addressed, pursuant to N.J.A.C. 5:93-5.2(f). Through the TRIAD administered program, income eligible homeowners and landlords may take advantage of a 0% interest deferred payment loan, payable on the transfer of title, for repairs to major systems.

Thus far, TRIAD administered local rehabilitation program has resulted in the rehabilitation of 13 units, all of which were completed subsequent to April 1, 2010. The listing of rehabilitated units is set forth in the Rehabilitation Unit Information Report, last updated November 3, 2019. This report indicates the rehabilitation of 13 units at a total cost of $151,968.00. Said total rehabilitation cost averages to $11,689.85 per project, exceeding the minimum per unit hard costs of $10,000 per N.J.A.C. 5:97-6.2(b)2. In sum, this local rehabilitation program allows for the claim of 13 rehabilitation credits.

As has been historically true, Washington Township will continue to encourage participation in the Gloucester County Rehabilitation Program and will continue to implement rehabilitation

measures using TRIAD or another entity, until the Township's obligation of 127 units has been satisfied.

Credits:	38
Total Credits:	**38**

3.0 PRIOR ROUND OBLIGATION: 1987 - 1999

3.1 Numeric Obligation as Recognized

As per the terms of the Settlement Agreement with FSHC, and as discussed in greater detail above, Washington Township is relying on the Prior Round numeric obligation of 507 as promulgated by N.J.A.C. 5-93.

3.2 Prior Round Formulas Having Applicability for Award of Credit

Regional Contribution Agreements (N.J.A.C. 5: 93-6.1(a)1): For a municipality that has received substantive certification or a judgment of repose and is not seeking a vacant land adjustment, the number of units that may be transferred through this mechanism equates to .5(municipal pre-credited need - prior cycle credits - credits pursuant to N.J.A.C. 5:93-3.4 - impact of the 20 percent cap - the impact of the 1,000 units limitation to N.J.A.C. 5:93-14 - any units transferred as a result of a previously approved RCA.

Based on the formula, and as long as any RCA Agreement was entered into prior to 2008, Washington Township may transfer up to 272 units [.5(544)] to a receiving community in that: (i) there are no prior cycle credits, (ii) no impacts resulting from the 20 percent cap or 1,000 unit limitation, nor (iii) units transferred as a result of a previously approved RCA).

Rental Obligation (N.J.A.C. 5:93-5.15(a)): For a municipality not receiving an adjustment pursuant to N.J.A.C. 5:93-4.2, the rental obligation shall equal .25 (municipal pre-credited need - prior cycle credits - impact of the 20 percent cap - the impact of the 1,000 units limitation pursuant to N.J.A.C. 5:93-14 - the rehabilitation component).

Based on the formula, Washington Township has a rental obligation of 127 units [.25(544-37)] in that: (i) there are no prior cycle credits claimed for this component, (ii) there are no impacts relative to the 20 percent cap or 1,000 unit limitation, and (iii) the impact of the rehabilitation component is applied to the 1999 - 2025 obligation.

Age Restricted Housing Limitation (N.J.A.C. 5:93-6.1(b)): For RCA sending municipalities, the age restricted housing cap is set at: .25 (municipal precredited need - rehabilitation component - prior
cycle credits - transferred or proposed RCA units) - any first round age restricted
units.

Based on the formula, Washington Township has an age restricted housing limitation of 79 units [.25 (544-37-189)-0] in that: (i) there is rehab component of 37[10], as indicated in the prior round rules, (ii) 189 RCA, and (iii) no age restricted units were applied in satisfaction of the 1987 - 1993 housing obligation.

[10] Indigenous Need (46) – Rehab (9) = 46– 9 = 37 (see appendix A)

Rental Unit Bonus and Limitation (N.J.A.C. 5:93-5.15(d)): A municipality shall receive two units (2.0) of credit for rental units available to the general public and one and one-third (1.33) units of credit for age restricted rental units. However, no more than 50 percent of the rental obligation shall receive a bonus for age restricted units; further providing, no rental bonus shall be granted for rental units in excess of the rental obligation, which here is 127 units.

3.3 Site Suitability Analysis

Pursuant to N.J.A.C. 5:93-1.3, sites that are designated to produce affordable housing shall be available, approvable, developable, and suitable according to the following criteria:

- "Available site" means a site with clear title, free of encumbrances which preclude development for low and moderate income housing. N.J.A.C. 5:93-1.3.
- "Approvable site" means a site that may be developed for low and moderate income housing in a manner consistent with the rules or regulations of agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low and moderate income housing. Ibid.
- "Developable site" means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable area wide water quality management plan (including the wastewater plan) or is included in an amendment to the area wide water quality management plan submitted to and under review by the DEP. Ibid.
- "Suitable site" means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4. Ibid.

In addition to the above qualifications, it is also sound planning for sites to be consistent with the State Development and Redevelopment Plan. Sites that are located in Planning Area 1: Metropolitan or Planning Area 2: Suburban of the State Development and Redevelopment Plan, or are located in an existing sewer service area, are the preferred location for municipalities to address their fair share obligations. The entirety of the Township is located in Planning Area 1 and Planning Area 2.

3.4 Summary of Prior Round 1987 - 1999 Satisfaction

Washington Township's 507-unit Prior Round Compliance Mechanisms	Credits	Bonuses	Total
Regional Contribution Agreements			
City of Camden	152	-	152
City of Gloucester	37	-	37
100% Affordable Family Rentals- Existing			
County House Village (Block 16, Lots 8.05, 8.06) (46 of 96)	46	46	92
Inclusionary Developments - Existing			
Mill Stream Apartments Affordable Family Rentals (Block 2.13, Lot 3.01)	95	81	176
Inclusionary Developments – Approved			
Presbyterian Homes Age-Restricted Rentals (Block 118, Lot 1) (17 of 41)	17	-	17
Assisted Living – Existing			
Gardens at Cross Keys (Block 84.16, Lot 3)	7	-	7
Terraces at Park Place (Block 51.09, Lot 1.01)	15	-	15
Kaplan Development Group (Block 54.10, Lot 7.02)	11	-	11
Total	**380**	**127**	**507**

3.5 Projects Addressing the Obligation

The Township is able to fully satisfy the Prior Round 1987 - 1999 obligation through application of: (i) credits emanating from Regional Contribution Agreements (RCAs), (ii) family rental units and associated bonus credits, (iii) age restricted rental units and associated bonus credits, and (iv) Assisted Living Facility affordable housing credits; as described below:

3.5.1 Regional Contribution Agreements

The Township executed two (2) regional contribution agreements for which all funds were transferred during the Prior Round resulting in the transferring in sum of 189 units, being less than the maximum number of units that may be transferred of 244.

Gloucester City. Thirty-seven (37) units were transferred at $20,000.00 per unit for a total funds commitment of $740,000.00.

City of Camden. One hundred fifty-two (152) units were transferred at $20,000.00 per unit for a total funds commitment of $3,040,000.00.

Both receiving municipalities have completed their obligations under the RCAs.

Credits:	189
Total Credits:	**189**

3.5.2 100% Affordable Family Rentals - Existing

County House Village. This constructed and occupied project is situated at 1901 Aron's Circle (Block 16, Lots 8.05 and 8.06) and is a 100 percent affordable development, comprised of 96 family rental units. The project was funded through the Federal Low-Income Housing Tax Credit (hereinafter "LIHTC") Program. Housing Administration, including income qualifications and the setting of rents, is performed by the management company, County House Village Associates, LLP, a subsidiary of the Ingerman Group. This project was completed in 1998. Pursuant to a Second Round Judgment of Repose, the Township was awarded 46 rental credits plus 46 rental bonuses for this round, the remaining credits are addressed in the Third Round.

Credits:	46
Bonus Credits:	46
Total Credits:	**92**

3.5.3 Inclusionary Developments - Existing

Millstream Apartments. This constructed and occupied inclusionary development is located at 241 Blackwood-Barnsboro Road (Block 2.13 Lot 3.01) and is comprised of 312 market rate units and 95 affordable family rental units. The development was funded through the LIHTC Program. Certificates of occupancy were first issued in 1999. The site is limited to 81 bonus credits by the 25% Prior Round rental bonus cap in the FSHC Settlement Agreement.

Credits:	95
Bonus Credits:	81
Total Credits:	**176**

3.5.4 Inclusionary Developments - Approved

Presbyterian Homes Project. This project will consist of at least 204 age-restricted units, broken down as follows: an assisted-living facility; a memory-care facility; and independent-living units. The developer proposes a twenty percent (20%) affordable set-aside across all of the units. The Township is claiming seventeen (17) of those units to help satisfy its Prior Round obligation. The development is located at 147 Johnson Road (Block 118, Lot 1).

- Site Control
  - The site is owned by Hospital Corporation of America, an operator of healthcare facilities.
- Administrative Entity
  - An experienced affordable housing administrative entity acceptable to the Township that will administer at least 30-year UHAC affordability controls

and affirmative marketing. The administrative entity will income qualify applicants and will provide long-term administration of the units in accordance with COAH's rules at N.J.A.C. 5:93-9.2 and 5:93-11.1 and UHAC per N.J.A.C. 5:80-26.1.

- ❖ Very Low/ Low/ Moderate Income Split
  - All affordable units will be split 50/50 between low- and moderate-income households and the odd number is split in favor of the low-income unit (N.J.A.C. 5:93-2.20). Additionally, at least 13% of all affordable units shall be affordable to very low-income households. The assisted living facility and memory care units will be based on COAH regulations per N.J.A.C. 5:93-5.16.
- ❖ Site Suitability Analysis
  - The site is available, approvable, developable and suitable, and is appropriate for multi-family housing.
  - The site is located in the Metropolitan State Planning Area (PA1), therefore promoting development of affordable housing here would be aligned with State and Local planning goals.
  - The site is currently vacant and set back behind some retail uses fronting Black Horse Pike and residential uses along Johnson Road. The site is compatible with surrounding uses.
  - The site has potential access from both Johnson Road and Black Horse Pike.
  - There are observed wetland areas on the site, but there exists enough unconstrained land to successfully develop the site even when accounting for the 50-foot wetlands buffer. There are no floodplain issues associated with the site
  - The site has access to both water and sewer service.

Credits:	17
Total Credits:	**17**

3.5.5 Assisted Living - Existing

Gardens at Cross Keys. This constructed and occupied assisted living facility is entitled to seven age-restricted affordable housing credits from the 7 out of 79 total beds (10% Medicaid bed set-aside) located in the facility, which is located at 3152 Glassboro Cross Keys Road (Block 84.16, Lot 3).

Credits:	7
Total Credits:	**7**

Terraces at Park Place. This constructed and occupied assisted living facility is entitled to 15 credits from the 15 out of 76 total beds (20% Medicaid bed set-aside) located in the facility, which is located at 661 Delsea Drive (Block 51.09, Lot 1.01).

Credits:	15
Total Credits:	**15**

Kaplan Development Group Assisted Living Facility. This constructed and occupied assisted living facility is entitled to 11 credits from the 11 out of 112 total beds (10% Medicaid bed set-aside) located in the facility. The assisted living facility is located at 349 Greentree Road (Block 54.10, Lot 7.02).

Credits:	11
Total Credits:	**11**

4.0 THIRD ROUND

4.1 Numeric Obligation as Recognized

Washington Township's Third Round Obligation is 925, as was agreed upon in the Court approved June 26, 2019 FSHC Settlement Agreement as amended by the First Amendment. [11]

4.2 Formulas Having Applicability for Award of Credit

Rental Obligation: .25 (Third Round obligation)
Based on the formula, Washington Township has a rental obligation of 232 units [.25 (925)][12]

Age Restricted Housing Limitation (N.J.A.C. 5:93-5.14(a): .25 (Third Round obligation)
Based on the formula, Washington Township has an age restricted housing limitation cap of 231 units [.25 (925)]

Rental Unit Bonus and Limitation (N.J.A.C. 5:93-5.15(d): A municipality shall receive two units (2.0) of credit for rental units available to the general public and one and one-third (1.33) units of credit for age restricted rental units. However, no more than 50 percent of the rental obligation shall receive a bonus for age restricted units; further providing, no rental bonus shall be granted for rental units in excess of the rental obligation, which here is 232 units.

Very low Requirement: Thirteen percent (13%) of affordable housing units within each bedroom distribution which were part of a formal Township action which took place after July 17, 2008, will be required to be very low. [13]

4.3 Site Suitability Analysis

Pursuant to N.J.A.C. 5:93-1.3, sites that are designated to produce affordable housing shall be available, approvable, developable, and suitable according to the following criteria:

- "Available site" means a site with clear title, free of encumbrances which preclude development for low and moderate income housing. N.J.A.C. 5:93-1.3.
- "Approvable site" means a site that may be developed for low and moderate income housing in a manner consistent with the rules or regulations of agencies with

[11] Per the Settlement Agreement, at least 50% of units addressing the Third Round must be available to families.
[12] Per the Settlement Agreement, at least 50% of Third Round rental units must be available to families.
[13] Per the Settlement Agreement, at least 50% of very low-income units must be available to families

jurisdiction over the site. A site may be approvable although not currently zoned for low and moderate income housing. Ibid.

- "Developable site" means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable area wide water quality management plan (including the wastewater plan) or is included in an amendment to the area wide water quality management plan submitted to and under review by the DEP. Ibid.
- "Suitable site" means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4. Ibid.

In addition to the above qualifications, it is also sound planning for sites to be consistent with the State Development and Redevelopment Plan. Sites that are located in Planning Area 1: Metropolitan or Planning Area 2: Suburban of the State Development and Redevelopment Plan, or are located in an existing sewer service area, are the preferred location for municipalities to address their fair share obligations. The entirety of the Township is located in Planning Area 1 and Planning Area 2.

4.4 Summary of Satisfaction of the Township's Third Round Obligation:

Washington Township's 925-unit Third Round Compliance Mechanisms	Credits	Bonuses	Total
Alternate Living Arrangements			
Group Home Bedrooms	19	0	19
100% Affordable Family Rentals - Existing			
County House Village (50 of 96)	50	50	100
Gloucester County Housing Authority	5	5	10
Inclusionary Developments - Existing			
Washington Square Mixed-Use Family Rentals (Block 115, Lots 3 and 3.01)	70	70	140
Inclusionary Developments – Proposed			
Blackwood Family Rental Project	27	27	54
Presbyterian Homes Age-Restricted Rentals (24 of 41)	24	-	24
Watson Drive Family Rentals (Block 115, Lot 7)	80	80	160
100% Affordable- Proposed			
Black Horse Pike Senior Rentals (Block 113, Lots 23, 24, and 25)	64	-	64
Redevelopment Areas – Washington Square and Delsea Drive – 335 Units Total			
Affordable Family Units	At least 262		262
Affordable Age-Restricted Units	No more than 93	-	93
Total	**694**	**232**	**926**

4.5 Projects Addressing the Obligation

Washington Township will address its Third Round Obligation through: (i) credits from the constructed and occupied County House Village project, (ii) credits from existing Gloucester County Housing Authority units, (iii) credits from existing group homes, (iv) credits from the Washington Square mixed-use project, (v) credits from the proposed Blackwood inclusionary project, (vi) credits from one proposed 100 percent affordable project, and (vii) credits from affordable units to be constructed in the Washington Square and Delsea Drive Redevelopment Zones.

4.5.1 Alternative Living Arrangements

Group Homes**.** Within Washington Township, there are five (5) group homes having in aggregate 19 bedrooms. The Township is able to claim one (1) credit for each of the 19 bedrooms.

Personalized Independent Living	145 Hurffville Road	Block 195.13, Lot 9.03	3 Bedrooms
Arc of Gloucester County*	275 Greentree Road	Block 194.12, Lot 7.03	3 Bedrooms
Elwyn New Jersey**	5 Concord Court	Block 196.02, Lot 39	5 Bedrooms
Elwyn New Jersey**	838 Richmond Drive	Block 110.05, Lot 34	4 Bedrooms
Elwyn New Jersey**	308 Hilbert Drive	Block 182, Lot 3	4 Bedrooms

Credits: 19
Total Credits: 19

*Arc of Gloucester County is a non-profit organization serving people with intellectual and related developmental disabilities and their families through education, advocacy and direct services.[14]

**Elwyn New Jersey coordinates services for individuals having complex medical, mental, emotional, or behavioral problems.[15]

4.5.2 100% Affordable Family Rentals - Existing

County House Village. This constructed and occupied project is situated at 1901 Aron's Circle (Block 16, Lots 8.05 and 8.06) and is a 100 percent affordable development, comprised of 96 family rental units. The Township is using forty-six (46) of the total 96 affordable housing units from this project towards its Prior Round Obligation. See above. The remaining 50 credits will be applied to the Third Round. Please see the description of this project in the Prior Round section above for a full analysis of site suitability and other affordable housing crediting issues.

Credits: 50
Bonus Credits: 50
Total Credits: 100

Gloucester County Housing Authority Units. The Gloucester County Housing Authority owns and operates 5 rental, single-family homes within the Township all of which are occupied by low-income families as required by the deed of trust filed with the United States Department of Housing and Urban Development (HUD) and as also required by the annual contributions contract with HUD that guarantees the housing authority will operate in accord with HUD rules, a requirement of which limiting occupancy to families having an income equal to or less than 50% of HUD income limits. These units resulted from the purchase of existing single-family dwellings - settlement dates are noted below. Eligibility of occupying families is re-certified on an annual basis. The table below summarizes the location of each of these units:

[14] http://www.thearcgloucester.org
[15] http://www.elwyn.org

180 Altair Drive	Block 82.26, Lot 2	June 26, 1981	3 bedrooms	Very Low Income
2 Auriga Lane	Block 82.22, Lot 1	May 21, 1981	3 bedrooms	Moderate Income
15 Fomal Court	Block 82.01, Lot 37	February 13, 1981	3 bedrooms	Very Low Income
403 Tuckahoe Road	Block 96, Lot 2.01	July 15, 1981	3 bedrooms	Low Income
1 Walnut Avenue	Block 55, Lot 11	April 1, 1981	3 bedrooms	Low Income

Credits: 5
Bonus Credits: 5
Total Credits: 10

4.5.3 Inclusionary Developments - Existing

Washington Square Mixed-Use Family Redevelopment Project. Washington Township adopted an ordinance creating the Washington Square Redevelopment Area and created the Washington Square Redevelopment Plan on November 19, 2007, which Redevelopment Plan has been revised from time to time. This Redevelopment Plan governs redevelopment activity over those lands within the boundaries of Fries Mill Road, Hurffville-Cross Keys Road, and the Black Horse Pike.

In November of 2008, the Township and the Planning Board entered into a Redevelopment Agreement with Washington Square Partners, LLC ("Redeveloper") to build a mixed-use project that included affordable housing on the subject property that encompasses approximately 35 acres on 255-269 Hurffville-Cross Keys Road (Block 115, Lot 21). On March 25, 2015, the Washington Township Council adopted a resolution to enter into an Amendment to the Redevelopment Agreement and adopted an Ordinance approving a Financial Agreement for the project. Both the Amendment to the Redevelopment Agreement and the Financial Agreement were subsequently entered into, and the settlement was approved by the Court after a properly noticed Fairness Hearing via an order entered on October 21, 2015, which declared that the project created a realistic opportunity for the creation of affordable housing and was fair and reasonable to low-and-moderate income households (the Township and the developer also entered into a Financial PILOT Agreement for the project.

The affordable portion of this project (Buildings 2000 and 3000) are constructed and fully occupied. In total, the project consists of (1) 430 total residential units, 330 rental apartment units and 100 for-sale townhouse units, and (2) 170,000 square feet of retail and office space. The project includes 70 affordable family rental units.

Credits: 70
Bonus Credits: 70
Total Credits: 140

4.5.4 Inclusionary Developments - Proposed

Blackwood Inclusionary Project**.** 27 affordable family rental units from the proposed 180-unit Blackwood Inclusionary Project (Block 5, Lots 1 and 1.01) for a 15% set-aside. A Settlement Agreement was executed by the developer and was entered into by the Township on May 10, 2017. An implementing zoning ordinance was adopted by the Township on July 12, 2017. The project received preliminary and final site plan approval from the Township's Planning Board on August 3, 2021. The project is located generally in the area of 450 Blackwood-Barnsboro Road.

- Site Control
  - Lot 1 is owned by M&T at Blackwood, LLC, and Lot 1.01 is owned by JSM at Blackwood, LLC.
- Administrative Entity
  - An experienced affordable housing administrative entity acceptable to the Township that will administer the at least 30-year UHAC affordability controls and affirmative marketing. The administrative entity will income qualify applicants and will provide long-term administration of the units in accordance with COAH's rules at N.J.A.C. 5:93-9.2 and 5:93-11.1 and UHAC per N.J.A.C. 5:80-26.1.
- Bedroom Distribution
  - Per UHAC regulations, the combined number of efficiency and one-bedroom units shall be no greater than 20% of the total low-and moderate-income units, at least 30% of all low-and moderate-income units shall be two-bedroom units, at least 20% of all low-and moderate income units shall be three-bedroom units.
- Very Low/ Low/ Moderate Income Split
  - All affordable units within each bedroom distribution will be split 50/50 between low- and moderate-income households and the odd number is split in favor of the low-income unit (N.J.A.C. 5:93-2.20). Additionally, at least 13% of all affordable units within each bedroom distribution shall be affordable to very low-income households. Therefore, 4 of the units shall be affordable to very low-income households, 10 units shall be affordable to low-income households, and 13 units shall be affordable to moderate-income households. Of the 4 very low-income units, there shall be at least one (1) very-low-income 3-bedroom unit and at least two (2) very-low-income 2-bedroom units.
- Rental Bonus
  - This project is eligible for Third Round rental bonuses per N.J.A.C. 5:93-5:15 as the Township has provided a firm commitment for the construction of rental units.
- Site Suitability Analysis
  - The site is available, approvable, developable and suitable, and is appropriate for multi-family housing.
  - The site is suitable for residential development because it is located nearby other single-family detached and multi-family housing units.
  - The site is connected to the surrounding area very well, as it sits at the intersection of Woodbury-Turnersville Road and Barnsboro Road.

- Through reviewing New Jersey Department of Environmental Protection's (DEP) wetland maps there are some wetlands located on the eastern corner of the site. The wetland area is not large and should not cause significant issues with development. Additionally, FEMA flood maps were reviewed, and no floodplain issues are associated with the site.
- The site is located in the Metropolitan Planning Area (PA1) and Suburban Planning Area (PA2) according to the New Jersey State Development and Redevelopment Plan, delineating it as an area for smart growth.
- The site contains access to streets and Township water and sewer service. Adjacent land uses are compatible, and include a convenience store, recreation complex, daycare facility, and several residential developments.

Credits:	27
Bonus Credits:	27
Total Credits:	**54**

Presbyterian Homes Project**.** 41 affordable housing units in the approved 204-unit Presbyterian Homes Project (Block 118, Lot 1). The Township is using seventeen (17) of the total 41 affordable housing units from this project towards its Prior Round Obligation. The remaining twenty-four (24) credits will be applied to the Third Round. Please see the description of this project in the Prior Round section above for a full analysis of site suitability and other affordable housing crediting issues.

Credits:	24
Credits:	**24**

Watson Drive Project**.** Per the First Amendment to the June 26, 2019 FSHC Settlement Agreement, this proposed 400-unit inclusionary project will include both sale and rental units, including eighty (80) affordable family rental units, located on Watson Drive (Block 115, Lot 7), which is within the Washington Square Redevelopment Area. A Developer's Agreement was entered into between the Township and the landowner on August 11, 2021. As per the terms of the First Amendment to the June 26, 2019 FSHC Settlement Agreement, this inclusionary development may not be used as a part of meeting the 55% of developable land being dedicated to residential use within the Washington Square Redevelopment Area.

- Site Control:
  - As discussed above, the Township and the landowner entered into a developer's agreement to ensure that the site is developed with affordable housing. The Township has also amended the Redevelopment Plan in which this site is located to allow for the site's development.
- Administrative Entity:
  - An experienced affordable housing administrative entity acceptable to the Township will administer at least 30-year UHAC affordability controls and affirmative marketing. The administrative entity will income qualify applicants and will provide long-term administration of the units in

accordance with COAH's rules at N.J.A.C. 5:93-9.2 and 5:93-11.1 and UHAC per N.J.A.C. 5:80-26.1.

- ❖ Bedroom Distribution:
  - Per UHAC regulations, the combined number of efficiency and one-bedroom units shall be no greater than 20% of the total low-and moderate-income units, at least 30% of all low-and moderate-income units shall be two-bedroom units, at least 20% of all low-and moderate income units shall be three-bedroom units. As per the First Amendment to the June 26, 2019 FSHC Settlement Agreement, there will be no more than 16 one-bedroom units in the project and at least 16 three-bedroom units in the project.
- ❖ Very Low/ Low/ Moderate Income Split:
  - All affordable units within each bedroom will be split between very-low, low- and moderate-income households as follows: 11 units affordable to very low-income households at 30% or less of the regional median income, 35 affordable to low-income households at 50% or less of the region median income, and 34 may be affordable to moderate-income households at 80% or less of the region median income. There shall be no more than 2 very-low-income one-bedroom units, at least 3 very-low income three-bedroom units, while the remaining 6 very-low income units may be either 2 or 3 bedroom units.
- ❖ Rental Bonus:
  - This project is eligible for Third Round rental bonuses per N.J.A.C. 5:93-5:15 as long as the landowner and/or developer of the project provides a firm commitment for the construction of rental units.
- ❖ Site Suitability Analysis:
  - The site is available, approvable, developable and suitable, and is appropriate for multi-family housing.
  - The site is currently vacant and adjacent to retail and office uses.
  - There are both multi-family and single-family detached housing units nearby, so more housing would not be out of character for the area.
  - There are very small amounts of wetland areas to the eastern side of the site.
  - There are no floodplain issues associated with the site.
  - The site is located in the Suburban Planning Area (PA2).
  - The site contains access to streets and Township water and sewer service. Adjacent land uses are compatible, and include single-family residential homes, and retail establishments.

Credits:	80
Bonus Credits:	80
Total Credits:	**160**

4.5.5 100% Affordable - Proposed

Black Horse Pike Project: Located on Black Horse Pike (Block 113, Lots 23, 24, 25), this approved (preliminary only) 64-unit one hundred percent (100%) affordable age-restricted rental project will contain 9 very low-income units, 23 low income units, and 32 moderate income units.

- Site Control:
  - Ingerman Development Company, LLC ("Ingerman") has site control and entered into a Memorandum of Understanding ("MOU") with the Township on March 10, 2021, which was replaced with an Amended version of the MOU (entered into on August 11, 2021), to allow the Project to be constructed as per the June 26, 2019 FSHC Settlement Agreement with FSHC as amended The Township also rezoned the site for the production of affordable housing. The project received preliminary site-plan approval from the Planning Board on August 3, 2021. In addition, a PILOT Agreement was entered into between the Township and Ingerman on September 23, 2020, and an Amendment to same was entered into on August 11, 2021. Finally, the Township also adopted a resolution of need for the project.
- Administrative Entity:
  - An experienced affordable housing administrative entity acceptable to the Township will administer a thirty (30) year affordability period tax credit deed restriction with a fifteen (15) year extended control period from the date of initial occupancy, for a total control period of at least forty-five (45) years and affirmative marketing. The administrative entity will income qualify applicants and will provide long-term administration of the units in accordance with COAH's rules at N.J.A.C. 5:93-9.2 and 5:93-11.1 and UHAC per N.J.A.C. 5:80-26.1.
- Bedroom Distribution:
  - The bedroom-distribution for this age-restricted project will follow UHAC regulations.
- Very Low/ Low/ Moderate Income Split:
  - The income splits for the project will be as follows: 9 very-low income units restricted to households earning 30% or less of median income, 23 low-income units restricted to households earning 50% or less of median income, and 32 moderate-income units restricted to households earning 80% or less of median income.
- Funding
  - The Developer will apply for 9% Tax Credits for this project.
  - The Township will be contributing $300,000 from its Affordable Housing Trust Fund towards the project.
- Construction Schedule
  - Ingerman will be applying for 9% tax credits to fund the project, then once the funding is secured, a construction schedule will follow.
- Site Suitability
  - The site is available, approvable, developable and suitable, and is appropriate for multi-family housing.
  - The site is situated along Black Horse Pike and neighbors retail and residential uses.
  - This site is located near the Presbyterian Homes project site.
  - The land is largely unconstrained by wetlands.
  - There are no floodplain issues associated with the site.
  - The site is in the Metropolitan State Planning Area (PA1), therefore promoting development of affordable housing here would be aligned with State and Local planning goals.

- The site contains access to streets and Township water and sewer service. Adjacent land uses are compatible, and include single-family residential homes, and retail establishments.

Credits:	64
Total Credits:	**64**

4.5.6 Redevelopment Areas - Delsea Drive and Washington Square

Washington Township has declared two areas as being in need of redevelopment, and adopted redevelopment plans for each, pursuant to the Local Redevelopment and Housing Law N.J.S.A. 12A-1 et seq. - these redevelopment areas being the Washington Square Redevelopment Area and the Delsea Drive Redevelopment Area.

The Washington Square Redevelopment Area, which is bounded by Fries Mill Road, Hurffville-Cross Keys Road, and the Black Horse Pike, encompasses approximately 635 acres, of which approximately 214.43 acres are developable and vacant.

The Delsea Drive Redevelopment Area encompasses approximately 803 acres, of which approximately 111.73 acres are developable and vacant, and is comprised of parcels along the Delsea Drive (NJSH Rt. 47) corridor from Pittman-Downer Road (County Road 658) to Blackwood-Barnsboro Road (County Route 603). The area also extends northeastward along the Blackwood-Barnsboro Road corridor, terminating at the intersection with Mount Pleasant Road.

In accordance with the June 26, 2021 FSHC Settlement Agreement, as amended by the First Amendment, the redevelopment plans for these two areas have been amended and are in the process of being adopted by the Township to (a) increase the allowed residential densities in both areas to at least ten (10) units per acre, (b) require a twenty percent (20%) affordable housing set-aside for all residential (both rental and for-sale) projects, including the residential portion of any mixed-used developments, constructed in both redevelopment areas, and (c) require all other affordable housing requirements, such as phasing, affirmative marketing, and bedroom mixes in accordance with Paragraph 4 of the First Amendment.

For all residential (both rental and for-sale) projects constructed in the redevelopment zones, the two redevelopment plans shall require that thirteen percent (13%) of the affordable units are very-low-income (30% or less of median income), forty percent (40%) of the affordable units are low-income, and forty-seven percent (47%) of the affordable units are moderate-income. Each of these income distributions shall be distributed within each bedroom distribution.

There is a total of 164.77 developable, vacant acres in the Delsea Drive Redevelopment Area and 214.43 developable, vacant areas in the Washington Square Redevelopment Area, as shown in Exhibit B to the First Amendment, which includes a list of the blocks and lots, owner, total acres, and vacant developable acres.

Within sixty (60) days of the entry of a conditional Judgment of Compliance and Repose Order after a duly noticed combined Fairness and Compliance Hearing is held to approve this First Amendment and the Township's Housing Element and Fair Share Plan, and before a second

order is entered by the Court finalizing the Judgment of Compliance and Repose, the Township shall amend the Washington Square and Delsea Drive Redevelopment Plans, with an opportunity for comment and review by FSHC and the Special Master prior to introduction, so that both redevelopment plans require the following:

- Designate a minimum of thirty-seven percent (37%) of the developable, vacant land area of each project in the Delsea Drive Redevelopment Area, and fifty-five percent (55%) of the developable, vacant land area of each project in the Washington Square Redevelopment Area, for inclusionary residential use in conformance with the terms stated above. This means that at least 178 acres of the developable, vacant land across the two redevelopment areas must be zoned and used solely for residential inclusionary development – at least 61 acres in the Delsea Drive Redevelopment Area and at least 117 acres in the Washington Square Redevelopment Area.

- Designate and require that at least 132.5 of the developable, vacant acres between the two redevelopment areas be zoned and used for non-age-restricted family residential uses.[16] A maximum of 46.5 developable, vacant acres between the two Redevelopment Areas may be zoned and used for age-restricted residential uses, including assisted living.

The above shall provide a realistic opportunity for the following number of affordable units:

- Total Inclusionary Affordable Units: A minimum of 355 affordable units across both redevelopment areas.

    - Inclusionary Family Non-Age-Restricted Affordable Units: A minimum of 262 affordable family rental or for-sale units across both redevelopment areas.

    - Inclusionary Age-Restricted Affordable Units: A maximum of 93 affordable age-restricted rental or for-sale units across both redevelopment areas.

Affordable Family: At least 262
Affordable Age Restricted: Maximum 93
Total Credits: 355

[16] Assisted living, special needs, among other alternative living arrangements, is understood to not be family housing.

4.6 Third Round Low/Moderate Income Split Chart

Project	Tenancy	Very Low	Low	Mod	Total Units
Group Homes	Rent	19	0	0	**19**
Gloucester County Housing Authority	Rent	2	2	1	**5**
County House Village (Block 16, Lots 8.05 and 8.06)	Rent	0*	25	25	**50**
Washington Square (Block 115, Lots 3 and 3.01)	Rent	10	25	35	**70**
Blackwood Project (Block 5, Lots 1 and 1.01)	Rent	4	10	13	**27**
Presbyterian Homes (Block 118, Lot 1)	Rent	5**	7	12	**24**
Watson Drive (Block 115, Lot 7)	Rent	11	35	34	**80**
Black Horse Pike (Block 113,23, 24 and 25)	Rent	9	23	32	**64**
Washington Square and Delsea Drive Redevelopment Areas:	Rent/Sale	47	139	169	**355**
Total		**107**	**266**	**321**	**694**

Notes:

* A total of 96 units are being split between the Prior and Third Rounds (46 and 50, respectively). This project was approved in 1998, prior to the very low unit requirement.

** A total of 41 units are being split between the Prior and Third Rounds (17 and 24, respectively). Due to the fact that the 13% very low unit requirement was not a legal requirement until 2008, no very low units are being applied as Prior Round credits.

4.7 Units Approved Post 2008

Project	Tenancy	Total Units
Group Homes:		
Personalized Independent Living (Block 195.13, Lot 9.03)	Rent	3
Arc of Gloucester County (Block 194.12, Lot 7.03)	Rent	3
Elwyn New Jersey (Block 196.02, Lot 39)	Rent	5
Elwyn New Jersey (Block 110.05, Lot 34)	Rent	4
Elwyn New Jersey (Block 182, Lot 3)	Rent	4
Gloucester County Housing Authority	Rent	5
Washington Square (Block 115, Lots 3 and 3.01)	Rent	70
Blackwood Project (Block 5, Lots 1 and 1.01)	Rent	27
Presbyterian Homes (Block 118, Lot 1)	Rent	41
Watson Drive (Block 115, Lot 7)	Rent	80
Black Horse Pike (Block 113, Lot 23, 24 and 25)	Rent	64
Redevelopment Areas		
Family Units	Rent/Sale	262
Age-Restricted	Rent/Sale	93
Total (1,074 affordable units in plan)		**661**

4.8 Very Low-Income Obligation Satisfaction

Project	Tenancy	Units
Group Homes:		
Personalized Independent Living (Block 195.13, Lot 9.03)	Rent	3
Arc of Gloucester County (Block 194.12, Lot 7.03)	Rent	3
Elwyn New Jersey (Block 196.02, Lot 39)	Rent	5
Elwyn New Jersey (Block 110.05, Lot 34)	Rent	4
Elwyn New Jersey (Block 182, Lot 3)	Rent	4
Gloucester County Housing Authority	Rent	2
Washington Square (Block 115, Lots 3 and 3.01)	Rent	10
Blackwood Project (Block 5, Lots 1 and 1.01)	Rent	4
Presbyterian Homes (Block 118, Lot 1)	Rent	5
Watson Drive (Block 115, Lot 7)	Rent	11
Black Horse Pike (Block 113, Lot 23, 24, and 25))	Rent	9
Redevelopment Areas		
Family Units	Rent/Sale	34
Age-Restricted	Rent/Sale	13
Total (Very Low-Income Obligation: 86 units; 43-unit Third Round Family Very Low-Income Obligation)		**106**

4.9 Bedroom Distribution Chart

Existing Projects	Tenancy	1 Bedroom	2 Bedroom	3+ Bedroom	Total Units
Mill Stream Apartments	Rent	16	60	20	**96**
Gloucester County Housing Authority	Rent	0	0	5	**5**
County House Village (Block 16, Lots 8.05 and 8.06)	Rent	0	48	48	**96**
Washington Square (Block 115, Lots 3 and 3.01)	Rent	14	42	14	**70**
Total		**30**	**150**	**87**	**267**

4.10 Third Round Rental and Family Rental

Project	Family	Rental Total
Group Home Bedrooms	-	19
County House Village (Block 16, Lots 8.05 and 8.06)	50	50
Gloucester County Housing Authority	5	5
Washington Square (Block 115, Lots 3 and 3.01)	70	70
Blackwood Project (Block 5, Lots 1 and 1.01)	27	27
Presbyterian Homes (Block 118, Lot 1)	-	24
Watson Drive (Block 115, Lot 7)	80	80
Black Horse Pike (Block 113, Lot 23, 24 and 25)	-	64
Total (232-unit Third Round Rental Obligation; 116-unit Third Round Family Rental Obligation)	**232**	**339**

4.11 Third Round Family

Project	Tenancy	Units
County House Village (Block 16, Lots 8.05 and 8.06)	Rental	50
Gloucester County Housing Authority	Rental	5
Washington Square (Block 115, Lots 3 and 3.01)	Rental	70
Blackwood Project (Block 5, Lots 1 and 1.01)	Rental	27
Watson Drive (Block 115, Lot 7)	Rental	80
Redevelopment Areas	Rental/Sale	262
Total (463-unit Third Round Family Obligation)		**494**

Map of Affordable Housing Sites



NEW JERSEY
COUNCIL ON AFFORDABLE HOUSING 93-99
MUNICIPAL LOW & MODERATE INCOME HOUSING NEED
11-OCT-93

COUNTY	NAME	ACTUAL DETER-IORATED UNITS	INDIG-ENOUS NEED	REALLOC. PRESENT NEED	PRESENT NEED 1993	PRO-SPEC-TIVE NEED 93-99	TOTAL NEED 93-99	PRIOR CYCLE PRO-SPEC-TIVE NEED	DEMOS	FILTER	CONVER	REHAB	PRE-CRED-ITED NEED	REDUCTION	CREDITS	20% CAP	CALCU-LATED NEED	VAC. LAND
GLOCESTR																		
	CLAYTON BORO.	48	32	11	43	53	96	38	11	-13	-6	-1	125	0	0	0	125	
	DEPTFORD TWP.	84	84	54	138	263	401	226	42	-55	-8	-4	602	0	-150	0	452	
	EAST GREENWICH TWP.	37	27	34	60	175	235	53	0	-7	-3	-2	276	-163	0	0	113	
	ELK TWP.	32	20	15	34	77	111	39	1	-4	-1	-1	146	0	0	0	146	
	FRANKLIN TWP.	95	72	25	98	129	227	13	15	-11	-5	-2	237	0	0	0	237	
	GLASSBORO BORO.	98	98	.	98	.	98	0	6	-53	-22	-2	28	0	0	0	28	
	GREENWICH TWP.	36	28	44	72	200	272	73	0	-6	-4	-1	334	0	0	0	334	
	HARRISON TWP.	39	25	28	53	144	197	33	8	-12	-3	-2	222	-93	0	0	129	
	LOGAN TWP.	28	26	51	77	280	357	126	3	-4	-1	-2	479	0	0	-105	374	
	MANTUA TWP.	72	53	35	88	177	265	92	5	-14	-3	-2	342	-217	0	0	125	
	MONROE TWP.	119	119	47	165	238	404	164	40	-39	-12	-4	554	0	0	0	554	
	NATIONAL PARK BORO.	31	17	4	20	18	38	12	3	-5	-3	-1	44	0	0	0	44	
	NEWFIELD BORO.	18	9	3	12	15	27	0	0	-3	-2	-1	22	0	0	0	22	
	PAULSBORO BORO.	111	68	.	68	.	68	0	4	-21	-14	0	36	0	0	0	36	
	PITMAN BORO.	130	51	10	61	48	109	23	4	-30	-15	-2	89	-12	0	0	77	
	SOUTH HARRISON TWP.	14	10	5	15	28	43	0	0	-2	-1	-1	40	0	0	0	40	
	SWEDESBORO BORO.	43	11	3	14	15	29	17	0	-7	-4	-1	34	0	0	0	34	
	WASHINGTON TWP.	46	46	62	108	334	443	173	4	-58	-7	-9	544	0	0	0	544	
	WENONAH BORO.	32	13	5	18	26	44	6	0	-5	-2	-2	41	0	0	0	41	
	WEST DEPTFORD TWP.	76	76	60	136	265	401	113	6	-65	-11	-3	441	-204	0	0	237	
	WESTVILLE BORO.	66	28	5	33	24	57	27	1	-19	-11	-1	54	0	0	0	54	
	WOODBURY CITY	157	126	.	126	.	126	0	8	-45	-25	-1	62	0	-62	0	0	
	WOODBURY HEIGHTS BOR	22	17	7	24	32	56	20	1	-4	-2	-2	70	0	0	0	70	
	WOOLWICH TWP.	11	7	26	33	133	166	49	2	-2	0	-1	215	0	0	-113	101	
COUNTY TOTAL		1442	1059	536	1595	2674	4269	1297	164	-481	-165	-48	5035	-689	-212	-218	3915	