

RECEIVED

OCT 31 2015

OFFICE OF THE TOWNSHIP CLERK

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

ECOPY

PREPARED FOR

THE TOWNSHIP OF WILLINGBORO
IN THE COUNTY OF BURLINGTON
STATE OF NEW JERSEY

October 30, 2015

Adopted by the Planning Board
Of the Township of Willingboro November 9, 2015

Endorsed by the Mayor and Council
of the Township of Willingboro November 9, 2015

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



Edward Vernick, P.E., C.M.E.
President
License #25691



George R. Stevenson, Jr., P.P., AICP
License #33LI00548700

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

Mayor

Mayor Eddie Campbell

Township Council

Jacqueline Jennings, Deputy Mayor
Nathaniel Anderson
Chris Wallace

Township Manager

Joanne Diggs

Township Clerk

Sarah Wooding

Township Attorney

Michael A. Armstrong, Esquire

Planning Board Members

Bettye Scott, Chair
Nathaniel Anderson
Eddie Campbell, Mayor
Dorothy Collins
Ronald Dash
Joanne Diggs
Sarah Holley
Connie House
Lavonne B. Johnson

Planning Board Attorney

Paul W. Sonstein, Esquire

Planning Board Engineer

Robert Mannix, P.E., P.P., C.M.E.

TABLE OF CONTENTS

		<u>Page</u>
Part 1: Housing Element		1
1.0	Introduction	1
2.0	Municipal Overview	4
3.0	Housing Stock: Occupancy and Physical Characteristics	6
3.1	Housing Occupancy	6
3.2	Housing Tenure	6
3.3	Units in Structure	7
3.4	Year Structure Built	8
3.5	Substandard Housing Condition	8
4.0	Housing Stock: Value and Affordability	9
4.1	Value of Owner-Occupied Units	9
4.2	Gross Rent	10
4.3	Housing Costs as Percentage of Household Income	10
	4.3.1 Selected Monthly Owner Costs as a Percentage of Household Income	11
	4.3.2 Gross Rent as a Percentage of Household Income	11
4.4	Other Indices of Affordability	12
	4.4.1 Median Housing Costs Relative to Median Household Income	12
	4.4.2 Ratio of Housing Value to Income for Units with a Mortgage	13
	4.4.3 Proportion of Households Unable to Afford Median Rent	13
5.0	Selected Demographics	14
5.1	Age and Population	14
5.2	Households: Type and Size	14
	5.2.1 Household Type	14
	5.2.2 Housing Size: 2010	15
5.3	Household Income Level	15
6.0	Existing and Probable Future Employment	16
6.1	Employment Status	16
6.2	Employment by Occupation	17
6.3	Employment by Industry	17
6.4	In-Township Establishments and Employees by Industry: 2014	18
6.5	Probable Future Employment Opportunities	19
7.0	Housing Stock Projection	19
8.0	Lands Most Appropriate for Production of Affordable Housing	19
Part 2: Achievement of Fair Share		20
1.0	Introduction	20
2.0	Present Need: Defined, Determined, and Addressed	20
	2.1 As Defined	20
	2.2 As Determined	20

2.3	As Addressed	21
3.0	Prior Round Obligation (1987 - 1999)	22
3.1	Satisfaction of Realistic Development Potential	23
3.2	Formulas Having Applicability for Award of Credit	23
3.3	Projects Addressing the Obligation	23
3.4	Summary of Realistic Development Potential Satisfaction	24
4.0	Unmet Global Need	25
4.1	Addressing of Global Unmet Need	25
4.2	Projects Yielding Credits for Addressing of Global Unmet Need	25
4.3	Summary of Credits Available for Global Unmet Need Satisfaction	28

Appendices

Appendix 1	Vacant Land Inventory
Appendix 2	Land Use Map
Appendix 3	Owner Occupied Properties Rehabilitated in Willingboro Township: 01/01/99 to 09/03/15
Appendix 4	Willingboro Township Rehabilitation Program: Promotional Brochure with Listing of Rehabilitated Units
Appendix 5	Spending Plan: Approved by Council on Affordable Housing Resolution Dated June 13, 2012
Appendix 6	Order Granting Prior Round Declaratory Judgment of Compliance, Repose from Litigation and Stay of Third Round Obligations
Appendix 7	Order Lifting "Scarce Resource" Restraints

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 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 Willingboro 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 has 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 for Willingboro Township has been prepared, following the New Jersey Supreme Court Decision decided on March 10, 2015, In re Adoption of N.J.A.C. 5:96 & 5:97 by the N.J. Council on Affordable Housing, 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.

The Supreme Court defined two types of municipalities: (i) municipalities that had received Round 3 Substantive Certification under the invalidated 2008 COAH regulations, and (ii) "participating" municipalities that had subjected themselves to the jurisdiction of COAH and had not yet received Round 3 Substantive Certification from COAH.

Although the Township was under the jurisdiction of a court and not COAH, it technically did not have to follow the protocols set forth in Mount Laurel IV. However, to play it safe, the Township did file a declaratory relief action in the 30-day window between June 8 and July 8, 2015 established by Mount Laurel IV and simultaneously brought a motion to extend the immunity it presently enjoys from exclusionary zoning lawsuits based upon the Prior Round Judgment of Compliance and Repose, which was entered by Judge Bookbinder on February 28, 2012. The Township took these precautions because it had previously found itself the subject of a builder's remedy suit filed by Atlantic Delta Corp at Montgomery, Inc., in 2006. The Township wished to avoid such cost of litigation in the future. Fair Share Housing Center ("FSHC") filed a motion opposing the Township's application and seeking the right to intervene so it could bring a lawsuit to challenge the Township as exclusionary and to secure attorneys fees under the New Jersey Civil Rights Act, Although FSHC withdrew its motion by way of a letter dated September 8, 2015, it has reserved the following rights:

FSHC nevertheless opposes the terms under which Willingboro requests immunity and urges the Court to grant the five month period of immunity starting from the date the complaint was filed in this matter, and to require the municipality to file a fair share plan that meets the its Third Round obligations by the end of the five month period.

The Court has yet to decide the Township's motion as of the date of the preparation of this plan and how it will respond to the objection of FSHC.

Pursuant to the settlement with Atlantic Delta Corp at Montgomery, Inc., the Township was to prepare, adopt, endorse and submit for approval a Housing Element and Fair Share Plan by the end of 2008 (the "2008 plan"). Accordingly, the 2008 plan was filed on December 30, 2008 with the Court for review and approval. Subsequently, as a mechanism to demonstrate compliance after an inadvertent administrative dismissal of the original lawsuit by the Court, the Township filed a Declaratory Judgment action on August 25, 2011 for approval of the prior round and rehabilitation components, as well as, certain viable round three components of the 2008 plan. On February 28, 2012, the Court entered a Prior Round Judgment of Compliance and Repose with a stay of third round obligations, with continued immunity from all Mount Laurel lawsuits and approved a multitude of affordable housing

credits. Said Prior Round Judgment of Compliance and repose is still in full force and effect today, as is the Township's and the Township's Planning Board immunity from all Mount Laurel lawsuits. On March 14, 2012, the Court entered an order lifting scarce resource restraints that had been imposed on the Township during the previous builder's remedy lawsuit. On June 13, 2012, COAH approved the Township's Spending Plan, which allowed the Township to expend funds on a rehabilitation program.

As noted, in response to Mount Laurel IV, Willingboro filed a Declaratory Judgment action, along with a motion for temporary immunity, on June 12, 2015. Subsequently, the Township's Planning Board has adopted, and the Township Council has endorsed this Housing Element and Fair Share Plan, and seeks from the Court an affirmative declaration of compliance regarding all aspects of its affordable housing obligations, with the understanding that it will be necessary to amend this plan at least one time after affordable housing numbers and standards are established by the Court.

Disclaimer

It must be emphasized that all of the affordable housing obligation numbers utilized in this Housing Element and Fair Share Plan are preliminary numbers and the ultimate obligations will be determined after the fair share issues are fully and fairly litigated. For now, without prejudice to the ultimate determination on the fair share issues, this plan utilizes the affordable housing numbers issued by COAH set forth in the "New Jersey Council On Affordable Housing Substantive Rules of the New Jersey Council on Affordable Housing for the Period Beginning on (the Effective Date of these Rules) Proposed New Rules: N.J.A.C. 5:99" dated June 2014.

The history of obligation delineation to municipalities has not been an easy or straightforward path thus far. While this Township, and many others around the state, are dependent upon a set number to create their Fair Share Housing Plans from, there is 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, the only other currently available expert report regarding the allocation of fair share numbers to specific municipalities is the July 2015 report prepared by David Kinsey, P.P., F.A.I.C.P. on behalf of FSHC (hereinafter the "Kinsey Report"). The New Jersey State League of Municipalities ("League") has also submitted two other reports to the Courts. These two reports evaluate the report of Dr. Kinsey. They do not establish fair share numbers to specific municipalities. Nassau Capital Advisors, LLC and Econsult Solutions ("Econsult") prepared these two reports for the League. The Kinsey Report defined the prospective need as the need for the period 1999 through 2025 and concluded that the need for this period was 201,382. On the other hand, the report prepared by Nassau Capital Advisors, LLC projected and estimated that the inclusionary zoning strategy is capable of delivering a total of between 17,000 to 24,000 new units of low and moderate income housing during the next ten years spread across the state. These reports widely differ and reveal the difficult issues the Court will need to consider when it makes an ultimate determination on the fair share issues.

Willingboro entered into a Shared Services Agreement ("SSA") along with roughly 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 has since entered into a contract with Econsult to prepare a second report (the "Solutions Report"), which will calculate fair share obligations for all of the municipalities in the state. The Solutions Report will be completed by the end of this year. Until this report is completed, Willingboro will rely on the 2014 COAH fair share numbers as its preliminary fair share obligations for this Housing Element and Fair Share Plan. The Township reserves the right to amend this plan once the Solutions Report is completed by Econsult and the Court assigns the Township final fair share obligations.

FSHC's expert, David Kinsey contends that the Township's obligation for the third housing cycle alone should be 232-units. As the courts grapple with the different approaches to fair share calculations by FSHC and municipalities, it is anticipated that the courts will need to deal with a more fundamental issue. How can any rationale formula impose an affordable housing obligation on any municipality that has unquestionably not used its power to zone to exclude low and moderate-income households? Indeed, based on 2013 COAH Regional Income Limits for Region 5, of which Willingboro is a part, **43.5% of the total households in the Township are low or moderate income**, up 6% from 37% in 2000. To impose an obligation on such a municipality places further burdens on the very class of low and moderate-income households that the Supreme Court devised the Mount Laurel doctrine to benefit.

2.0 MUNICIPAL OVERVIEW

Willingboro Township is centrally located along the northerly tier of Burlington County, encompassing an approximate area of 7.8 square miles, and is bounded to the north by the Townships of Edgewater Park and Delanco, to the east by the Township of Burlington, to the south by the Township of Westampton, and to the west by the Townships of Delran and Moorestown.

The 2010 Census revealed that the Township had a total population of 31,629 persons, which represents a 4.1% decrease in the total population as reported by the 2000 Census (33,008 persons). The U.S. Census Bureau 2009-2013 5-Year American Community Survey estimated a total population of 31,772 persons.

Willingboro is an Urban Aid Community and can be characterized as a mainly residential community, populated with households with substantially lesser median household, family, and per capita incomes than countywide.

Based on 2013 COAH Regional Income Limits for Region 5, of which Willingboro is a part, **43.5% of the total households in the Township are low or moderate income**, up 6% from 37% in 2000. This number is based on the 2010 Census average household size of 2.90 persons and the income limits for low and moderate income households within the region for 3 person households. Utilizing that information, 19.9% fall within the low or very low income limit and 23.6% fall within the moderate-income range.

As to housing value, the median value of an owner-occupied unit in Willingboro is estimated to be, pursuant to the U.S. Census Bureau, 2009-2013 5-Year American Community Survey, to be only 67% of the county average (\$169,500 v. \$252,500).

With respect to the State Development and Redevelopment Plan (SDRP), the Township is classified as Metropolitan Planning Area (PA1). Areas of this 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

In terms of residential growth, for the period January 2000 through December 2014, the Township issued building permits authorizing the development of 723 units,² which averages to authorizations for 48.2 units per year. For the period 2007 through 2014, the Township issued permits authorizing 306 units, being 42.3% of the total and equating to an average for these years of 38.2 units per year.

Table 1. Housing Units Authorized by Building Permits: 2000 - 2014

<u>Year</u>	<u>1 & 2 Family</u>	<u>Multi-family</u>	<u>Total</u>
2000-2003	---	---	113*
2004	31	88	119
2005	13	24	37
2006	8	140	148
2007	1	0	1
2008	4	0	4
2009	1	0	1
2010	3	0	3
2011	98	0	98
2012	1	50**	51
2013	1	24**	25
2014	2	121**	123

*The DCA Construction Reporter did not begin to report housing permits by type until 2004.

**It appears that virtually all of these permits relate to the 450-unit, 24 building inclusionary mixed-use development on Route 130.

¹ The New Jersey State Development and Redevelopment Plan, adopted March 1, 2001, p. 188.

² New Jersey Department of Community Affairs (DCA) Construction Reporter, www.state.nj.us/dca/divisions/codes/reporter, accessed August 7, 2015.

3.0 HOUSING STOCK: OCCUPANCY AND PHYSICAL CHARACTERISTICS

3.1 Housing Occupancy

Table 3.1: Housing Occupancy

	2000 Willingboro Township		2010 Willingboro Township		2010 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total Housing Units	11,124	100.0	11,442	100.0	175,615	100.0
Occupied housing units	10,713	96.3	10,884	95.1	166,318	94.7
Vacant housing units	411	3.7	558	4.9	9,297	5.3
Homeowner vacancy rate	2.0	(X)	1.9	(X)	1.5	(X)
Rental vacancy rate	2.9	(X)	4.6	(X)	8.3	(X)

Source: U.S. Census Bureau, Census 2000/2010 Summary File 1
 (X) means the estimate is not applicable or is not available

From the time of the 2000 Census to the 2010 Census, the Township witnessed an increase of 318 housing units. The percentages of occupied housing units, vacant housing units, and the homeowner vacancy rate have remained relatively constant. The most significant change is the 1.7% increase in the rental vacancy rate. The Township's housing occupancy characteristics approximate conditions found countywide other than for the rental vacancy rate which is 3.7% less than the County average.

3.2 Housing Tenure

Table 3.2: Housing Tenure

	2000 Willingboro Township		2010 Willingboro Township		2010 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Occupied housing units	10,713	100.0	10,884	100.0	166,318	100.0
Owner-occupied housing units	9,912	92.5	9,560	87.8	129,656	78.0%
Average household size of owner-occupied units	3.0	(X)	2.87	(X)	2.72	(X)
Renter-occupied housing units	801	7.5	1,324	12.2	36,662	22.2

	2000 Willingboro Township		2010 Willingboro Township		2010 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Average household size of renter-occupied units	3.82	(X)	3.16	(X)	2.26	(X)

Source: U.S. Census Bureau, Census 2000/2010 Summary File 1
(X) means the estimate is not applicable or is not available

From the time of the 2000 Census to the time of the 2010 Census, the Township experienced an increase of 171 occupied units, but at the same time, a 4.7% decrease in owner-occupied units. The decrease in owner-occupied units and the concomitant increase in renter-occupied units may be attributable to the severe economic downturn in the 2000s; however, Willingboro's percentage of owner-occupied units is 9.8% higher than the County average (87.8% v. 78.0%).

3.3 Units in Structure

Table 3.3: Units in Structure

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total Housing Units	11,124	100.0	11,461	11,461	176,180	176,180
1-unit detached	10,325	92.8	10,117	88.3%	114,105	64.8%
1-unit, attached	752	6.8	839	7.3%	26,210	14.9%
2 units	12	0.1	42	0.4%	3,422	1.9%
3 or 4 units	8	0.1	10	0.1%	5,740	3.3%
5 to 9 units	12	0.1	0	0.0%	8,577	4.9%
10 to 19 units	9	0.1	198	1.7%	8,521	4.8%
20 or more units	0	0.0	255	2.2%	6,930	3.9%
Mobile home	6	0.1	0	0.0%	2,665	1.5%
Boat, RV, van, etc.	0	0.0	0	0.0%	10	0.0%

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3
2009-2013 Willingboro Township/Burlington County Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The 2009-2013 American Community Survey (ACS) estimates that the Township has experienced an increase of 337 housing units from the time of the 2000 Census and indicates that 1-unit detached, followed by 1-unit, attached units remain the most prevalent types of construction. The Township has witnessed an increase in constructions of 10 or more units.

3.4 Year Structure Built

Table 3.4: Year Structure Built

	2009-2013 Willingboro Township		2009-2013 Burlington County
	Estimate	Percent	Percent
Total Housing Units	11,461	11,461	176,180
Built 2010 or later	1	0.0%	0.4%
Built 2000 to 2009	521	4.5%	10.9%
Built 1990 to 1999	148	1.3%	13.0%
Built 1980 to 1989	115	1.0%	14.8%
Built 1970 to 1979	1,760	15.4%	18.0%
Built 1960 to 1969	5,840	51.0%	15.3%
Built 1950 to 1959	2,447	21.4%	12.7%
Built 1940 to 1949	440	3.8%	3.4%
Built 1939 or earlier	189	1.6%	11.4%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The American Community Survey (ACS) estimates indicate that Willingboro has a greater percentage of its housing stock being at least 45 years old than found countywide (77.8% v. 42.8%); however, only 5.4% of the Township's housing stock predates 1950, where the County average is 14.8%. The age of Willingboro's housing stock implies that there is likely a need for the rehabilitation of major systems of many of the Township's dwelling units.

3.5 Substandard Housing Condition

Table 3.5: Selected Characteristics

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Occupied Housing Units	10,713	100.0	10,826	94.5%	164,979	164,979
Lacking complete plumbing facilities	12	0.1	72	0.7%	590	0.4%
Lacking complete kitchen facilities	37	0.3	99	0.9%	890	0.5%
More than 1.0 occupants per room (overcrowding)	286	2.7	230	2.1%	1,939	1.2%

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3

2009-2013 Willingboro Township Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

2009-2013 Burlington County Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The American Community Survey (ACS) estimate indicates the Township experienced slight increases in the percentage of substandard units owing to incomplete plumbing or kitchen facilities. The estimate also suggests that there has been a slight decrease in the

percentage of units having more than one occupant per room. The percentages generally reflect the countywide condition, except the ACS estimate suggests that Willingboro has a 0.9% higher incidence of overcrowding than found countywide (2.1% v. 1.2%), which may be attributed to a lingering aftereffect of the economic downturn of the first decade of the 2000s.

4.0 HOUSING STOCK: VALUE AND AFFORDABILITY

4.1 Value of Owner-Occupied Units

Table 4.1: Value of Owner-Occupied Units

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Owner-Occupied Units	9,705	100.0	9,282	9,282	128,340	128,340
Less than \$50,000	67	0.7	182	2.0%	3,779	2.9%
\$50,000 to \$99,999	5,584	57.5	474	5.1%	4,322	3.4%
\$100,000 to \$149,999	3,607	37.2	2,251	24.3%	10,694	8.3%
\$150,000 to \$199,999	395	4.1	3,768	40.6%	22,191	17.3%
\$200,000 to \$299,999	33	0.3	2,079	22.4%	40,938	31.9%
\$300,000 to \$499,999	11	0.1	403	4.3%	35,684	27.8%
\$500,000 to \$999,999	0	0.0	81	0.9%	9,495	7.4%
\$1,000,000 to more	8	0.1	44	0.5%	1,237	1.0%
Median (dollars)	96,700	(X)	169,500	(X)	252,500	(X)

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3

2009-2013 Willingboro Township Source: U.S. Census Bureau, 2009-2013 5-year American Community Survey

2009-2013 Burlington County Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

(X) means the estimate is not applicable or is not available

The American Community Survey (ACS) estimate indicates that there has been a significant increase in the value of owner occupied units since the time of the 2000 Census as suggested by: the 75.2% increase in the median value of owner-occupied units. This increase in value is also evidenced by the fact that 28.1% of Willingboro's housing stock is valued at \$200,000 or more, where the 2000 Census reported 0.5% for the same value range; the percentage of units having a value of \$200,000 or more pales in comparison to the County average (28.1% v. 68.1%).

The ACS estimate also indicates that Willingboro's housing stock has a median value of 67.1% of that of the County average.

4.2 Gross Rent

Table 4.2: Gross Rent

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Occupied Units Paying Rent	807	100.0	1,457	1,457	34,919	34,919
Less than \$200	0	0.0	0	0.0%	218	0.6%
\$200 to \$299	0	0.0	0	0.0%	435	1.2%
\$300 to \$499	30	3.7	0	0.0%	563	1.6%
\$500 to \$749	76	9.4	104	7.1%	2,590	7.4%
\$750 to \$999	139	17.2	76	5.2%	7,229	20.7%
\$1,000 to \$1,499	454	56.3	392	26.9%	13,973	40.0%
\$1,500 or more	41	5.1	885	60.7%	9,911	28.4%
Median (dollars)	1,100	(X)	1,613	(X)	1,186	(X)

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3

2009-2013 Willingboro Township Source: U.S. Census Bureau, 2009-2013 5-year American Community Survey

2009-2013 Burlington County: Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

(X) means the estimate is not applicable or is not available

The American Community Survey (ACS) estimate indicates that there has been a significant increase in gross rent since the time of the 2000 Census as evidenced by: the 46.6% increase in median rent and by the percent of units having a rent of \$1,000 or more (61.4% v. 87.6%). The ACS Survey also estimates that renters in Willingboro pay rent that is 1.36% higher than the County average.

4.3 Housing Costs as Percentage of Household Income

A metric of affordability is the percentage of monthly household income dedicated to housing costs. In the case of mortgaged property, an affordable unit is one where monthly housing expenses to include principal and interest does not exceed 28% of monthly household income. For rental units, an affordable monthly rent is one which does not exceed 30% of the monthly household income.

Table 4.3.1: Selected Monthly Owner Costs as a Percentage of Household Income (SMOCAPI)

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)	7,694	79.3	6,984	6,984	93,788	93,788
Less than 20.0 percent	4,320	44.8	1,673	24.0%	27,056	28.8%
20.0 to 24.9 percent	1,538	15.8	876	12.5%	17,163	18.3%
25.0 to 29.9 percent	1,113	11.5	695	10.0%	13,115	14.0%
30.0 to 34.9 percent	822	8.5	888	12.7%	10,075	10.7%
35.0 percent or more	1,856	19.1	2,852	40.8%	26,379	28.1%

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3
 2009-2013 Willingboro Township Source: U.S. Census Bureau, 2009-2013 5-year American Community Survey
 2009-2013 Burlington County Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The American Community Survey (ACS) estimate indicates a significant increase since the time of the 2000 Census in the percent of households having monthly owner costs of 30% or more of household income (27.6% v. 53.5%). The County average for owner costs of 30% or more is 38.8%. This Township statistic represents a result of the gap between the estimated 75.2% increase in median owner occupied housing costs since the time of the 2000 Census and the estimated median household income increase of 11.2% for the same time period.

Table 4.3.2: Gross Rent as a Percentage of Household Income (GRAPI)

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Occupied units paying rent (excluding units where GRAPI cannot be computed)	807	100.0	1,457	1,457	34,531	34,531
Less than 15.0 percent	67	8.3	87	6.0%	3,135	9.1%

	2000 Willingboro Township		2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
15.0 to 19.9 percent	112	13.9	86	5.9%	4,593	13.3%
20.0 to 24.9 percent	118	14.6	206	14.1%	4,741	13.7%
25.0 to 29.9 percent	126	15.6	196	13.5%	3,797	11.0%
30.0 to 34.9 percent	52	6.4	38	2.6%	3,193	9.2%
35.0 percent or more	259	32.1	844	57.9%	15,072	43.6%

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3

2009-2013 Willingboro Township Source: U.S. Census Bureau, 2009-2013 5-year American Community Survey

2009-2013 Burlington Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

(X) means the estimate is not applicable or is not available

The American Community Survey (ACS) estimates indicate since the time of the 2000 Census, that there has been a significant increase in the number of rental units for which the monthly rent is equal to or greater than 30% of household income (38.5% v. 60.5%) suggesting. The countywide condition is 52.8%. This Township statistic represents a result of the gap between the estimated 46.6% increase in median rent since the time of the 2000 Census and the estimated median household income increase of 11.2% for the same time period.

The ACS estimate also indicates a significant percentage decrease in rental units for which the monthly rent is less than 20% of household income (22.2% v. 11.9%). The County average is 22.4%.

4.4 Other Indices of Affordability

Housing affordability within the Township can also be ascertained from (i) a comparison of median housing costs for units with a mortgage to median household income, (ii) by the ratio of housing value to income for units with a mortgage, and (iii) by the percentage of households unable to afford median rent.

4.4.1 Median Housing Costs Relative to Median Household Income

Table 4.4.1 Median Housing Costs to Median Household Income

	2000 Willingboro Township	2009-2013 Willingboro Township
Median Housing Costs for Units with Mortgage	14,472	22,596
Median Income	60,869	67,697

	2000 Willingboro Township	2009-2013 Willingboro Township
Median Housing Costs as Percent of Median Income	23.7%	33.3%

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3
 2009-2013 Willingboro Township Source: 2009-2013 5-Year American Community Survey
 2009-2013 Burlington County Source: 2009-2013 5-Year American Community Survey

The American Community Survey (ACS) estimate indicates that the median housing costs for units with a mortgage in the Township are 33.3% of median income. The 2000 Census reported that median housing costs for units with a mortgage stood at a significantly more affordable 23.7% of median household income.

4.4.2 Ratio of Housing Value to Income for Units with a Mortgage

Table 4.4.2 Ratio of Housing Value to Income

	2000 Willingboro Township	2009-2013 Willingboro Township
Median Housing Value	96,700	171,200
Median Household Income	60,869	67,697
Ratio of Median Housing Value to Income	1.58:1	2.52:1

2000 Willingboro Township Source: U.S. Census Bureau, Census 2000 Summary File 3
 2009-2013 Willingboro Township Source: 2009-2013 5-Year American Community Survey

Units are generally considered to be affordable to prospective homeowners where the ratio of median housing value to median household income is in the range of 2.5:1 to 3.0:1. In 2000, the ratio was 1.58:1. The 2009-2013 5-Year American Community Survey (ACS) estimate indicates that the ratio has increased to 2.52:1, which suggests that housing of median value is affordable to prospective homeowners of households of median income.

4.4.3 Proportion of Households Unable to Afford Median Rent

The 2009-2013 American Community Survey (ACS) 5-Year Estimate reports that median gross rent in Willingboro Township was \$1,613 per month (\$19,356 annually). A minimum annual income of \$64,520 (\$19,356/.30) would be necessary to afford the median gross rent. As such, at a minimum, an estimated 28.7% of all households would not be able to afford to live in a dwelling rented at or above median gross rent; the countywide average is 18.8%.

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

5.1 Age and Population

Table 5.1 Willingboro Township: Total Population by Age 2000 and 2010

	2000		2010		2000-2010 Number Change
	Number	Percent	Number	Percent	
Total population	33,008	100.0	31,629	100.0	(-) 1,379
Under 5 years	2,024	6.1	1,823	5.8	(-) 201
5 to 9 years	2,504	7.6	1,923	6.1	(-) 581
10 to 14 years	2,829	8.6	2,180	6.9	(-) 649
15 to 19 years	2,605	7.9	2,471	7.8	(-) 134
20 to 24 years	1,589	4.8	1,905	6.0	316
25 to 34 years	3,526	10.7	3,186	10.1	(-) 340
35 to 44 years	5,099	15.4	4,037	12.8	(-) 1,062
45 to 54 years	4,801	14.5	4,996	15.8	195
55 to 59 years	1,972	6.0	2,129	6.7	157
60 to 64 years	1,813	5.5	1,942	6.1	129
65 to 74 years	2,896	8.8	2,893	9.1	(-) 3
75 to 84 years	1,111	3.4	1,730	5.5	619
85 years and over	239	0.7	414	1.3	175
Median age (years)	37.9	(X)	41.0	(X)	3.1

Source: U.S. Census Bureau, Census 2000 and 2010 Summary File 2
(X) Not applicable.

The data reveals that Township experienced a 4.1% decrease in population from the time of the 2000 Census to the 2010 Census. The data also highlights: (i) a 9.9% decrease in the number of children in the Under 5 years cohort, (ii) a 20.8% decline in the number of residents in the 35 to 44 years cohort, (iii) the movement of the "baby boomer" generation through the age pyramid, and (iv) a 58.8% increase in the numbers of residents of 75 years and older, suggesting an increasing need for housing alternatives for seniors.

5.2 Households: Type and Size

Table 5.2.1: Household Type

	2000 Willingboro Township		2010 Willingboro Township		Change 2000 to 2010 Number
	Number	Percent	Number	Percent	
Total Households	10,173	100.0	10,884	100.0	711
Family households[1]	8,780	82.0	8,287	76.1	(-) 493
Nonfamily households[2]	1,933	18.0	2,597	23.9	664
Householder Living alone	1,607	15.0	2,193	20.1	583

Source: U.S. Census Bureau, 2000 and 2010 Census Summary File 2

- [1] A household that has at least one member of the household related to the householder by birth, marriage, or adoption is a "Family household".
- [2] Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

Table 5.2.1 reveals that the Township witnessed a 5.6% decrease in family households and a 36.2% increase in householders living alone since the time of the 2000 Census.

Table 5.2.2: Household Size: 2010

	Owner-Occupied	Percent	Renter-Occupied	Percent
Total households	9,560	100.0	1,324	100.0
1-person household	1,856	19.4	337	25.4
2-person household	3,039	31.7	244	18.4
3-person household	815	8.5	229	17.2
4-person household	1,365	14.2	197	14.8
5-person household	856	8.9	162	12.2
6-person household	344	3.5	82	6.1
7-or-more-person household	285	2.9	73	5.5

Source: U.S. Census Bureau, 2010 Census, Summary File 2
 (X) means the estimate is not applicable or is not available

In terms of owner-occupied units, 2-person households (31.7%) are the most prevalent household size in the Township; 1-person households (25.4%) are the most prevalent household size of renter-occupied units.

5.3 Household Income Level

Table 5.3: Household Income Level in the Past 12 Months (In 2013 Inflation-Adjusted Dollars)

	2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent
Total households	10,826	10,826	164,979	164,979
Less than \$10,000	400	3.7%	5,151	3.1
\$10,000 to \$14,999	238	2.2%	3,916	2.4
\$15,000 to \$24,999	744	6.9%	10,387	6.3
\$25,000 to \$34,999	779	7.2%	11,563	7.0
\$35,000 to \$49,999	1,533	14.2%	18,220	11.0
\$50,000 to \$74,999	2,245	20.7%	29,633	18.0
\$75,000 to \$99,999	1,923	17.8%	25,129	15.2
\$100,000 to \$149,999	2,041	18.9%	32,042	19.4
\$150,000 to \$199,999	601	5.6%	15,533	9.4
\$200,000 or more	322	3.0%	13,405	8.1
Median Income (dollars)	67,697	(X)	78,446	(X)

	2009-2013 Willingboro Township		2009-2013 Burlington County	
	Estimate	Percent	Estimate	Percent
Mean Income (dollars)	77,485	(X)	98,211	(X)

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The 2009-2013 5-Year American Community Survey (ACS) estimate indicates that 34.2% of the Township's households have an annual income of less than \$50,000; the countywide condition is 29.8%. Generally, the estimates for the Township approximate those of the County, except for those households having annual incomes equal to or greater than \$150,000. The 2009-2013 ACS estimates illuminate that the Township's median income and mean income are respectively 86.2% and 78.8% of the countywide average. The data also illuminates the estimated median income increase disparity of the Township as compared to the County average. Since the time of the 2000 Census, the Township's median income has increased an estimated 11.2% where the County average has increased an estimated 33.8%.

6.0 EXISTING AND PROBABLE FUTURE EMPLOYMENT

6.1 Employment Status

Table 6.1: Employment Status

	2009-2013 Willingboro Township	
	Estimate	Percent
Population 16 years and over	25,507	25,507
In labor force	17,070	66.9%
Civilian labor force	17,017	66.7%
Employed	14,457	56.7%
Unemployed	2,560	10.0%
Armed Forces	53	0.2%
Not in labor force	8,437	33.1%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The 2009-2013 5-Year American Community Survey (ACS) estimates reveal that 66.9% of the population 16 years and over is in the labor force; the civilian component of which equates to 66.7%, of which 56.7% are employed. The 5-Year ACS estimate for Burlington County reveals that Willingboro has a lesser percentage of the employed civilian labor force than the County average (56.7% v. 61.1%) and a greater percentage of the civilian labor force that is unemployed than found countywide (10.0% v. 6.1%).

6.2 Employment by Occupation

Table 6.2: Employment by Occupation

Occupation	2009-2013 Willingboro Township	
	Estimate	Percent
Civilian employed population 16 years and over	14,457	14,457
Management, business, science, and arts occupations	4,142	28.7%
Service occupations	2,910	20.1%
Sales and office occupations	4,464	30.9%
Natural resources, construction, and maintenance occupations	646	4.5%
Production, transportation, and material moving occupations	2,295	15.9%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

Sales and service occupations are the most prevalent occupations of the Township's residents (30.9%), followed by the management, business, science, and arts occupations (28.7%).

6.3 Employment by Industry

Table 6.3: Distribution of Employment by Industry

Industry	2009-2013 Willingboro Township	
	Estimate	Percent
Civilian employed population 16 years and over	14,457	14,457
Agriculture, forestry, fishing and hunting, and mining	23	0.2
Construction	372	2.6
Manufacturing	930	6.4
Wholesale trade	571	3.9
Retail trade	1,720	11.9
Transportation and warehousing, and utilities	1,242	8.6
Information	363	2.5
Finance and insurance, and real estate and rental and leasing	1,037	7.2
Professional, scientific, and management, and administrative and waste management services	1,102	7.6
Educational services, and health care and social assistance	3,988	27.6
Arts, entertainment, and recreation, and accommodation and food services	989	6.8
Other services, except public administration	665	4.6
Public administration	1,455	10.1

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

By industry, the 2009-2013 5-Year American Community Survey (ACS) estimate reveals that 27.6% of the Township's work force is employed in the educational services, and health care and social assistance sector. The next most prevalent sector in which Willingboro's residents are employed is the retail trade sector (11.9%).

6.4 In-Township Establishments and Employees by Industry: 2014

Table 6.4: Average Annual Number of Establishments and Employees by Industry: 2014

Description	2014 Average	
	Units	Employment
FEDERAL GOVT TOTALS	1	53
LOCAL GOVT TOTALS	5	1,058
LOCAL GOVT EDUCATION	2	661
Construction	.	.
Manufacturing	.	.
Wholesale Trade	11	55
Retail Trade	.	.
Transp/Warehousing	8	110
Information	4	144
Finance/Insurance	17	130
Real Estate	.	.
Professional/Technical	15	96
Management	.	.
Admin/Waste Remediation	12	71
Education	.	.
Health/Social	67	1,956
Arts/Entertainment	3	30
Accommodations/Food	27	332
Other Services	71	177
Unclassifieds	.	.
PRIVATE SECTOR TOTALS	320	4,564

Source: New Jersey Department of Labor and Work Force Development, Annual Municipal - Sector Data - 2014

Table 6.4 above sets forth the average annual number of establishments and employees, by industry sector as grouped by North American Industry Classification System (NAICS) that exists within the Township, as reported for 2014, being the most recent year for which data is available. In 2014, the Township had an annual average of 320 establishments, employing on average 4,564 persons. The Health/Social sector was the predominate sector accounting for 20.9% of the establishments in Willingboro and 42.8% of the Township's in place employment.

6.5 Probable Future Employment Opportunities

The Delaware Valley Regional Planning Commission (DVRPC), the federally funded Metropolitan Planning Organization (MPO) for the Greater Philadelphia Region, which includes Burlington County, forecasts, for the period 2010 to 2040, that the Region will experience 10% employment growth.³

Three quarters of the industry sectors, in which the Township's residents are employed, are identified as either growth or stable sectors for the period 2012 through 2022.⁴ The two most predominate sectors, which account for 39.5% of the Township's employment, are the educational services, and health care and social assistance (27.6%) and the retail trade sector (11.9%) - the former identified as a stable sector; the latter as a growth sector.

As to employment growth within Willingboro, it is reasonable to presume that future employment opportunity will likely emanate from commercial redevelopment activity occurring within the Route 130 Corridor Redevelopment area which extends along the entirety of the segment of Route 130 within the Township.

7.0 HOUSING STOCK PROJECTION

Pursuant to settlement of the builder's remedy litigation in the matter of Atlantic Delta Corp. at Montgomery, Inc. v. Township of Willingboro and the Planning Board of the Township of Willingboro, the plaintiff was granted a builder's remedy allowing for a mixed-use, inclusionary development, the residential component of which being 450-units with 70 of these units restricted as affordable. At the time of this writing, certificates of occupancy have been issued for 280-units. As such, it is reasonable to presume that during the time of a third round certification, the remainder units (170) will be completed.

Approval has been granted for the development of 46-twin units at the site having a street address of 36 Rose Avenue. These units have not as yet been constructed. It is likely that this development will occur during the time of a third round certification.

8.0 LANDS MOST APPROPRIATE FOR PRODUCTION OF AFFORDABLE HOUSING

Willingboro Township's preference is for affordable housing to be created over time throughout the Township through private sector initiatives over time so to achieve a seamless integration of affordable and market rate housing. This preference results from recognition of the paucity of parcels available and suitable for residential development and the relatively small size of said parcels, as set forth in the vacant land inventory set forth in Appendix 1.

³ Delaware Valley Regional Planning Commission, *Investing in People and Places: Greater Philadelphia's Comprehensive Economic Development Strategy*, September 2014, p. 23.

⁴ *Industry Employment Projections for New Jersey and Counties: 2012-2022: Industries with Greatest Employment Growth*, (prepared by other than the Department of Labor pursuant to award of grant from the United States Department of Labor's Employment and Training Administration).

PART 2: ACHIEVEMENT OF FAIR SHARE

1.0 INTRODUCTION

This Fair Share Plan (*hereinafter* Plan) sets forth, in the first instance, Willingboro's present need, prior round obligation (1987-1999), and what, in effect, is the global unmet for the period 1999 to 2024. In the second instance, this Plan proposes, for each component of the obligation, mechanisms for the achievement of fair share, or as stated another way, the means by which the Township will provide realistic opportunity for the provision of housing affordable to low and moderate income households.

As discussed in detail above, the Township is relying on the fair share numbers in the proposed 2014 COAH regulations as its preliminary fair share numbers, and reserves the right to adjust said numbers in an amended plan, once Econsult prepares its Solutions Report by the end of the year.

2.0 PRESENT NEED: DEFINED, DETERMINED, AND ADDRESSED

2.1 As Defined

As diagramed at 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.⁵ The 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.⁶ This reduction in the number of surrogates was found to be by the Appellate Division to be within the Council's discretion and was upheld in the Supreme Court's decision In re N.J.A.C. 5:96 & 97.

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

The Township accepts as the Present Need, the number promulgated by the Council in the proposed 2014 Rules (N.J.A.C. 5-99), as the numbers then proposed for this component of the obligation were rooted in the 2010 decennial census. Willingboro's obligation was set as being 79 units. As this is only a preliminary number, the Township reserves the right to

⁵ N.J.A.C. 5:93, Appendix A, Present Need.

⁶ N.J.A.C. 5: 97, Appendix B, Tables.

adjust this number in an amended plan once the Econsult Solutions Report is finalized and the Court assigns the Township a final rehabilitation obligation.

2.3 As Addressed

For the satisfaction of present need, Willingboro is able to claim credits resulting from: (i) participation in the Burlington County Home Improvement Loan Program, and (ii) establishment of a Township sponsored rehabilitation program, by way of a contractual agreement with TRIAD Associates.

Willingboro participates in the Burlington County Home Improvement Loan Program administered by the Burlington County Office of Community Development. This program is funded by a community development block grant through the United States Department of Housing and Urban Development (HUD) and provides 0% per annum, simple interest deferred loans up to \$20,000.00 to income eligible single-family homeowners for the repair of major 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 on the occasion of the death of the individual who received the loan.

The Township actively encourages participation in the County program as evinced by the listing of units set forth in the report titled "Owner Occupied Properties Rehabilitated in Willingboro Township: 01/01/99 to 09/03/15." See Appendix 2. The County report indicates the funding of 15 projects, at a total cost of \$271,758. Said work averages to \$18,117.20 per project, well exceeding the minimum hard costs of \$8,000 per project. N.J.A.C. 5:93-5.2(h)2. As such, Willingboro claims 15 credits for the aforementioned projects which occurred in the years 2010 and thereafter.

The County program does not provide for the affordability controls of 6 years for rehabilitated owner-occupied units and 10 years for rehabilitated rental units. [N.J.A.C. 5:93-5.2(g)]. The Township is requesting a waiver from the affordability control requirements as the program advances the rehabilitation of major residential unit systems for income eligible residents, and otherwise fully conforms to statutory requirements. Parenthetically, of the 15 rehabilitation projects funded through the County Program, 13 of the dwellings are still held by the titleholder owning the property at the time the rehabilitation work was performed.⁷ Noteworthy also is the fact that the County report lists projects dating to 1999, which further evinces Willingboro's encouragement of participation in the County rehabilitation program.

The second prong of Willingboro's program relates to the Township's entering into a contractual agreement with TRIAD Associates for the establishment of a local program for the rehabilitation of 6 units. Low and moderate income homeowners and landlords were eligible to participate. The program featured a 0% interest deferred payment loan, payable on the transfer of title, for repairs to major systems. A promotional brochure and listing of

⁷ Willingboro Township Tax Assessor Report of September 14, 2015.

the 6 units, rehabilitated through this program, is set forth in Appendix 3. Affordability controls have been recorded.⁸

The cost of rehabilitation totaled \$86,636, averaging to \$14,439.33 per unit. This being the case, Willingboro is able to claim an additional 6 credits.

As has been historically true, Willingboro will continue to encourage participation in the Burlington County Home Improvement Loan Program, and will continue to implement rehabilitation measures until the Township's obligation has been fully satisfied.

Rental units are to be addressed in the Township's rehabilitation initiatives, pursuant to N.J.A.C. 5:93-5.2(f). Given, the Burlington County Program does not provide for the rehabilitation of rental units, Willingboro will again enter into an agreement with TRIAD Associates or, other qualified firm, for the administration of a rental unit rehabilitation program.

County Program Credits:	15
<u>In-house Program Credits:</u>	<u>6</u>
Total Credits:	21

3.0 PRIOR ROUND OBLIGATION (1987- 1999)

Under COAH's 2014 proposed regulations, Willingboro has a prior round need obligation of 279 units. This is an obligation that cannot be satisfied given the paucity of vacant, developable land. Pursuant to N.J.A.C. 5:93-4.1(a), the Township is exercising its right to pursue a vacant land adjustment to establish Realistic Development Potential (RDP) using the methodology set forth under N.J.A.C. 5:93-4.2.

The required vacant land inventory is set forth in spreadsheet format (See Appendix 1). As can be seen from the spreadsheet, there are 30.98 acres of vacant land available and appropriate for inclusionary development, yielding an RDP of 68 units, based on the proposed densities.

Utilizing the 2014 COAH regulations for preliminary numbers, the Township's prior round "unmet need" number is 211. This number is calculated by subtracting the Township's RDP of 68 from the Township's prior round number of 279.

The Supreme Court ruled that trial judges should look to COAH's approach to fair share issues from "prior rounds" to establish standards for Round 3. The approach COAH took to the unmet need differed in Round 1 than in Round 2. Whereas COAH imposed no obligation with respect to the unmet need in Round 1, it imposed an obligation to take certain steps with respect to the unmet need in Round 2. At this juncture, we do not know what approach the court will take with respect to the unmet need. The analysis set forth below shows steps the Township is willing to take to address its unmet need should the court rule that Round 2 standards apply.

⁸ Kathy Packowski, Triad Associates, e-mail of 09/09/2015.

3.1 Satisfaction of Realistic Development Potential (RDP)

Willingboro is able to fully address its realistic development potential (RDP) of 68 through application of units resulting from: (i) gut rehabilitation made possible through a New Jersey Department of Community Affairs (NJDCA) Neighborhood Stabilization Grant, (ii) the age-restricted, rental unit development, known as Doreathea D. Campbell Towers, and (iii) reservation of units resulting from a builder's remedy.

Formulas having applicability to the award of credit for the satisfaction of RDP are as enumerated below:

3.2 Formulas Having Applicability for Award of Credit

Rental obligation: for a municipality that receives an adjustment pursuant to N.J.A.C.5:93-4.2, the rental obligation shall equal 25 percent of the RDP.

Thusly, the Township's rental obligation is $.25 (68) = 17$ units.

Age Restricted Housing Limitation: For municipalities that received or are receiving a vacant land adjustment: age restricted units = $.25$ (realistic development potential + rehabilitation component - credits pursuant to N.J.A.C. 5:93-3.4) - any age restricted units in addressing the 1987-1993 housing obligation.

Thusly, the maximum number of age restricted units that may be claimed is 31 units, based on $.25 (68 + 79 - 21 - 0)$.

Rental Unit Bonus and Limitation: Pursuant to 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 17 units.

3.3 Projects Addressing the Obligation

Gut Rehabilitation: Willingboro was awarded a \$2M NJDCA Neighborhood Stabilization Grant for the acquisition, rehabilitation, and sale as affordable units to income eligible residents, of either foreclosed, vacant, or blighted properties. This program enabled the gut rehabilitation of the below 11 units; all units are subject to a 30 year affordability control period:⁹

45 Bosworth Lane	60 Budhollow Lane
46 Buttercup Lane	18 Flintrock Lane
15 Hargrove Lane	2 Haskell Lane

⁹ Telephone consultation of September 21, 2015, with, Patti Conrad, Willingboro Township Senior Code Enforcement Officer/Zoning Officer.

47 Hillcrest Lane
30 Pennant Lane
14 Randolph Place

7 Peartree Lane
53 Placid Lane

Credits: 11

Doreathea D. Campbell Senior Housing Complex: The complex is comprised of 104 rental units and is situated on a 3.34 acre tract known as 55 Sunset Road (Block 2, Lot 7.04). Occupancy of the facility is restricted to low and moderate income families. The certificate of occupancy for the facility was issued in 2001. Of the 104 units, 31 units, being the maximum number of age restricted units that currently may be claimed for credit, are now applied toward satisfaction of the RDP.

Also claimed are 2 bonus credits, based on .33 (17 x .5).

Credits: 17
Bonus Credits: 2
Total Credits: 19

Atlantic Delta Property. This approximate 40 acre parcel is situated on Route 130 (Block 5.01, Lots 5 and 13). Pursuant to the settlement of a builder's remedy litigation, Atlantic Delta is obligated to construct 70 affordable family rental units. The necessary development approvals have been granted and development of the site is ongoing. To date, 38 of the required 70 affordable units have been constructed and certificates of occupancy issued.

Willingboro here claims 24 credits, 1 per each of the now claimed 15 affordable units, as well as, 9 family rental bonus credits, being the maximum number of remainder rental bonus credits eligible for a claim of credit, given 8 of the 17 rental bonus credits have been assigned to the above mentioned Campbell Towers project.

Credits: 15
Bonus Credits: 9
Total Credits: 24

3.4 Summary of Realistic Development Potential (RDP) Satisfaction

Realistic Development Potential	68
(-) Gut Rehabilitation Credits	11
(-) Age Restricted Credits	31
(-) Age-Restricted Bonus Credits	2
(-) Family Rental Credits	15
(-) Family Rental Bonus Credits	9

4.0 GLOBAL UNMET NEED

Utilizing the 2014 COAH regulations, the Township is responsible for a Prior Round obligation (1987-1999) of 279 units, a Gap Round obligation (1999-2015) of zero units and a Round 3 obligation (1999-2015) of zero units.¹⁰ Therefore, the Global Unmet Need addressed in this plan is 211, which combines the Gap Round obligation and the Round 3 obligation. The Township reserves the right to adjust these numbers in an amended plan once the Econsult Solutions Report is finalized, and the Court determines these obligations.

4.1 Addressing of Global Unmet Need

For addressing the Township's Global Unmet Need of 211, the Township is able to employ credits emanating from: (i) the age-restricted, rental unit development, known as Doreathea D. Campbell Towers, (ii) reservation of units resulting from the award of a builder's remedy to Atlantic Delta, (iii) alternative living units, (iv) anticipated inclusionary development on Rose Street, and (v) gut rehabilitation program (conversion) undertaken by Salt & Light per memorandum of understanding with the Township. These projects yield a total of 246 credits which completely satisfies the Township's 211 Global Unmet Need and also leaves a 35 unit surplus to apply to any additional "unmet need" that may be assigned to the Township by the Court in the future. The Township also reserves the right to apply up to 53 additional rental bonus credits from these projects, should the Court determine that bonus credits can be applied to the Township's Global Unmet Need. Said bonus credits will give the Township an even greater total surplus.

4.2 Projects Yielding Credits for Addressing of Global Unmet Need

Doreathea D. Campbell Senior Housing Complex: The complex is comprised of 104 rental units and is situated on a 3.34 acre tract known as 55 Sunset Road (Block 2, Lot 7.04). Occupancy of the facility is restricted to low and moderate income families. For satisfaction of RDP, this plan assigned 31 units, leaving 73 units for assignment to unmet need.

Available Credits: 73

Atlantic Delta Family Rental Units: Pursuant to the award of a builder's remedy, Atlantic Delta was granted final approval for the development of a mixed-use inclusionary development on lands along the Township's Route 130 corridor, more specifically identified as Block 5.01, Lots 5 and 13, which lands encompass approximately 40 acres. For satisfaction of RDP, this plan assigned 15 units, leaving 55 units for assignment to unmet need.

Available Credits: 55

¹⁰ Technically, the gap period in the 2014 COAH regulations runs from 1999 to 2014 and Round 3 runs from 2014 to 2024, but for the purposes of this plan, those periods will run from 1999-2015 and 2015 to 2025. Since both the gap period and Round 3 numbers under the 2014 COAH regulations are zero, this plan assumes that the obligation for 2015 would also be zero.

Alternative Living Arrangement Units: Pursuant to N.J.A.C. 5:93-5.8, the unit of credit for an alternative living arrangement is the bedroom; as such, Willingboro is able to claim 42 credits, based on the below indicated number of bedrooms.

Block	Lot	Address	Owner	Operation	# Bedrooms	Date
412	29	82 Crestview Drive	Arc of Burlington	Group Home/ DDD	4	01-01-98
833	4	275 Evergreen Drive	ARC of Burlington	Group Home/ DDD	3	01-01-98
727	31	28 Grayson Circle	ARC of Burlington	Group Home/ DDD	3	01-01-98
1101	49	24 Thornhill Lane	Outlook America	Group Home/ Handicapped	4	11-26-97
410	5	26 Crescent Road	ADEPT	Group Home	3	01-01-98
903	45	34 Reaburn Lane	Personalized Independent Living	Group Home	2	12-10-03
1135	27	32 Tinker Place	Community Options	Group Home	4	10-12-05
1126	11	48 Toledo Lane	CaringM, Inc.	Group Home	4	09-26-13
708	33	63 Gamewell Lane	Crossroads Programs, Inc.	Group Home	4	10-16-01
704	31	38 General Lane	Crossroads Programs, Inc.	Group Home	4	08-30-01
635	5	18 Hanover Lane	Dakota Properties, Inc.	Group Home	4	04-26-13
1115	11	57 Tidewater Lane	Durand Academy & Community Svcs.	Group Home	5	01-13-04
409	70	186 Club House Drive	Dreamscapes Bldg. Visions, Inc.	Group Home	4	11-12-13
----	----	----	Township of Willingboro	Battered Women/Group Housing*	6	12-12-03
----	----	----	Catholic Charities	Battered Women/Group Housing*	3	10-01-80
----	----	----	Catholic Charities	Battered Women/Group Housing*	4	11-11-84

Block	Lot	Address	Owner	Operation	# Bedrooms	Date
----	----	----	Catholic Charities	Battered Women/Group Housing*	3	12-10-01
----	----	----	Catholic Charities	Battered Women/Group Housing*	3	12-10-01

* Due to the sensitive nature of the facility, the location is not herein identified.

Available Credits: 67

Age-Restricted For-Sale Units (Rose Street):

Pursuant to the execution of a Consent Order and subsequent revision thereto with KC Builders and Developers, LLC, having an office at 1301 North Kings Highway, Cherry Hill, New Jersey 08034, the Township accepted 8 affordable for-sale units (representing a 20% set-aside) as full satisfaction of the affordable housing obligation emanating from a major residential subdivision comprised of 34 age-restricted, market rate, single-family semi-detached units and 8 age-restricted units to be affordable to families of low and moderate income.

This project will be constructed over Lot 14 of Block 11.01 being a 5.8 acre parcel situated at the easterly terminus of the improved portion of Rose Street. Public sewer and water is available to the site. Preliminary major site plan approval was granted by the Township of Willingboro Planning Board on April 13, 2009. The development has not as yet been constructed; however, the approval remains valid, pursuant to the Permit Extension Act.

Available Credits: 8

Gut Rehabilitation: Salt & Light Company, Inc. The Township has entered into a Memorandum of Understanding (MOU) with this non-profit agency which is engaged in the acquisition of substandard units and gut rehabilitation of same. Per this MOU, the Willingboro has agreed to facilitate the production by Salt & Light Company, Inc. of 24 affordable units through the provision of letters of support and/or expressions of Township's consent where required. The MOU also provides for Township support for an additional 19 units with the condition that the first 24 units fully satisfy all COAH and UHAC requirements.

Available Credits: 43

4.3 Summary of Credits Available for Global Unmet Need Satisfaction

Age-Restricted Rental Units (Campbell Towers)	73
Family Rental Units (Atlantic Delta)	55
Alternative Living Arrangement	67
Age-Restricted For-Sale Units (Rose Street)	8
<u>Gut Rehabilitation (Salt & Light)</u>	<u>43</u>
Total Credits:	246

Appendix 1
Vacant Land Inventory

TOWNSHIP OF WILLINGBORO
VACANT LAND ANALYSIS
SEPTEMBER 2015

RDP

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	Net		RDP
1	1/9	CHARLESTON ROAD	GREENHOUSE PARTNERS LLC 43 CHARLESTON ROAD WILLINGBORO, NJ 08046	0.10	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0	0.0
2	2/7.04	55 SUNSET ROAD	WILLINGBORO SENIOR URBAN RENEWAL 1103 LAUREL OADK ROAD VOORHEES, NJ	3.55	SITE OF CAMPBELL TOWERS	0.0	0.0	0.0
3	3/4.09	300 CAMPBELL DRIVE	WILLINGBORO URBAN RENEWAL, LLC 11 NEW STREET ENGLEWOOD CLIFFS, NJ	0.77	PUBLIC LIBRARY COMPLEX; IRREGULARLY SHAPED, NOT SUITABLE FOR DEVELOPMENT	0.0	0.0	0.0
4	3/4.10	300 WILLINGBORO WAY	WILLINGBORO URBAN RENEWAL, LLC 11 NEW STREET ENGLEWOOD CLIFFS, NJ	3.44	ABUTS MUNICIPAL BUILDING PARKING AREA; APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 8 DWELLING UNITS/ACRE	3.44	3.44	6.0
5	4/3	VAN SCIVER PARKWAY	STAB BURLINGTON PARKWAY 1 FEDERAL STREET BOSTON, MA 02110	0.79	IRREGULARLY SHAPED SLIVER OF LAND	0.0	0.0	0.0
6	5.02/8 & 9	ROUTE 130	LEVITTOWN TIMES CORPORATION 8400 ROUTE 13 LEVITTOWN, PA 19057	2.0	DEVELOPED SITE	0.0	0.0	0.0
7	5.02/11	ROUTE 130	LEVITTOWN TIMES CORPORATION 8400 ROUTE 13 LEVITTOWN, PA 19057	10.4	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT; 12 DWELLING UNITS/ACRE	10.4	10.4	25.0
8	5.02/ 23	PENNYPACKER DRIVE	MINISTERIO APOSTOLICO INTERNATIONAL PO BOX 1002 WILLINGBORO, NJ 08046	2.38	INCOMPATIBLE WITH ADJACENT COMMERCIAL LAND USES	0.0	0.0	0.0
9*	8.00/3.01	BEVERLY-RANCOCAS RD	LENOLA BUILDERS, LLC P.O. BOX 89 EDGEWATER PARK, NJ 08010	1.7800	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 8 DWELLING UNITS/ACRE	1.7800	1.7800	2.8

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	Net
10*	11.01/5	4224 ROUTE 130	TVM INVESTMENTS, LLC 1065 E MOREHEAD ST-4TH FL CHARLOTTE, NC 28404	0.3443	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
11*	11.01/6	PINE STREET	DUMOCH, STEVE 53 GAFFNEY LANE WILLINGBORO, NJ 08046 VOLPE	0.3443		
12*	11.01/7	PINE STREET	DUMOCH, STEVE 53 GAFFNEY LANE WILLINGBORO, NJ 08046 VOLPE	0.3443		
13*	11.01/8	PINE STREET	DUMOCH, STEVE 53 GAFFNEY LANE WILLINGBORO, NJ 08046 VOLPE	0.3443	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 6 DWELLING UNITS/ACRE	2.0
14*	11.01/9	PINE STREET	DUMOCH, STEVE 53 GAFFNEY LANE WILLINGBORO, NJ 08046 VOLPE	0.3443		
15*	11.01/10	PINE STREET	DUMOCH, STEVE 53 GAFFNEY LANE WILLINGBORO, NJ 08046 VOLPE	0.3443		
16*	13/8.05	INDUSTRIAL DRIVE	AMERICAN SILESTONE & GRANITE, INC	3.53	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 12 DWELLINGS UNITS TO THE ACRE	7.5
17*	13.00/8.25 & 8.26	IRONSIDE COURT	INDUSTRIAL DEVELOPMENT CO 5 WOODBROOK ROAD VOORHEES, NJ 08043	4.42	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 4 DWELLING UNITS/ACRE; AFFECTED BY WETLANDS	2.4
18*	13.00/8.24	INDUSTRIAL DRIVE	QUALITY BAKERY PRODUCTS, INC 20 E. 5TH STREET TULSA, OK 74103	2.59	BUS STORAGE; RESIDENTIAL DEVELOPMENT INCOMPATIBLE W/SURROUNDING INDUSTRIAL DEVELOPMENT	0.0

1 Freshwater wetlands (1.38 acres)

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	RDP
19*	13.00/8.12	INDUSTRIAL DRIVE	NMJT, LLC 406 WILLOW LN SOUTHAMPTON, NJ 08088	2.12	DEVELOPMENT INCOMPATIBLE W/SURROUNDING INDUSTRIAL DEVELOPMENT	0.0
20*	13.00/8.16	INDUSTRIAL DRIVE	NMJT, LLC 406 WILLOW LN SOUTHAMPTON, NJ 08088	1.18	DEVELOPMENT INCOMPATIBLE W/SURROUNDING INDUSTRIAL DEVELOPMENT	0.0
21*	13.00/8.15	INDUSTRIAL DRIVE	NMJT, LLC 406 WILLOW LN SOUTHAMPTON, NJ 08088	1.21	DEVELOPMENT INCOMPATIBLE W/SURROUNDING INDUSTRIAL DEVELOPMENT	0.0
22	13/9	182 BEVERLY RANCOCAS ROAD	HT REALTY INC 355 SILLS ROAD YAPHANK, NY 11980	1.38	ENVIRONMENTAL CONSTRAINTS: WETLANDS; ENTIRELY WITHIN FLOODPLAIN; BALD EAGLE HABITAT; SITE ABUTS AND IS BOUNDED BY COMM/INDUSTRIAL DEVELOPMENT	0.0
23*	15/1, 2, 3, & 4	4118 ROUTE 130	ESTATE OF C.W. DAHMER P.O. BOX 60 MARLTON, NJ 08053	5.18	FORMER SITE OF BIG D MARINA; IMPROVEMENTS RAZED; APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 15 DWELLING UNITS/ACRE	15.5
24	15/6	FRONT STREET	KEYS, WLATER F & LESLIE M 6 FRONT STREET BEVERLY, NJ 08010	0.15	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
25	20.01/5	16 SOUTH KENNEDY WAY	SCHOLTZ, MILDRED PO BOX 109 RANCOCAS, NJ 08073	0.14	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
26	20.01/7	15 PIONEER LANE	MARC, JEAN A 22 PRINCE STREET ORANGE, NJ 07050	0.86	ENVIRONMENTALLY CONSTRAINED; AFFECTED BY WETLANDS (95%)	0.0

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	Net	
						Area (acres)	Comments
27	20.01/12.02	9 PIONEER LANE	CHINOSI, JOHN 54 OXFORD CIRCLE SOUTHAMPTON, NJ 08088	0.15	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT
28	26.00/1.01	SALEM ROAD	RANCOCAS HOSPITAL 1600 HADDON AVENUE CAMDEN, NJ 08103	3.30	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 6 DWELLING UNITS/ACRE	1.95 ²	2.3
29*	35/1	FENTON ISLAND	ESTATE OF FENTON, E % PHYLLIS ROUNTOS 6 WHARF STREET BEVERLY, NJ 08010	1.08	SURROUNDED BY WATER	0.0	0.0
30	105/24	VAN SCIVER PARKWAY	JONES, JOSEPH A 1517 MARNE HIGHWAY MOUNT HOLLY, NJ 08060	0.46	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0
31	21/17	17 VAN SCIVER PARKWAY	MEHTA, DHIREN 27 UPTON WAY SEWELL, NJ 08080	0.46	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0
32	241/41	31 BERKSHIRE LANE	MEHTA, DHIREN 27 UPTON WAY SEWELL, NJ 08080	0.17	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0
33	310/10	36 PHEASANT LANE	THE SALT AND LIGHT COMPANY, INC 1841 BURLINGTON MOUNT HOLLY ROAD WESTAMPTON, NJ 08060	0.20	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0
34	319/8	46 PINAFORE LANE	HICKSON, MARY 46 PINAFORE LANE WILLINGBORO, NJ 08046	0.19	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0	0.0
35	409/91	CLUB HOUSE DRIVE	NGP REALTY SUB, L P 2951 28TH ST, SUITE 3001 SANTA MONICA, CA 90405	2.52	UTILITY LINE	0.0	0.0
36	409/92 & 93	CLUB HOUSE DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	0.91	UTILITY LINE	0.0	0.0

2 60' x 900' access easement (1.24 acres)

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	RDP
37	409/94 & 95	CLUB HOUSE DRIVE	NAT GOLF OP PRIN%AMER GOLF CORP 2951 28TH STREET SANTA MONICA, CA. 90405	70.39	GOLF COURSE	0.0
38	412/6	WINDSOR LANE	NAT GOLF OP PRIN% AMER GOLF CORP 2951 28TH STREET SANTA MONICA, CA 90405	1.82	PART OF GOLF COURSE	0.0
39	412.00/53	39 SOUTH KENNEDY WAY	SAINTS MEMORIAL CMTY CH WLGBO, INC 11 SOUTH JFK WAY WILLINGBORO, NJ 08046	1.56	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT, 6 DWELLING UNITS/ACRE	1.8
40	412.00/54	SOUTH KENNEDY WAY	HYMAN, PABALA M RR #1 BORDENTOWN, NJ 08505	0.03	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
41	412/56	27 SOUTH KENNEDY WAY	SANIN'S MEMORIAL COMMUNITY CHURCH 11 SOUTH KENNEDY WAY WILLINGBORO, NJ 08046	2.26	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
42	412/64	10 PINE LANE	ALSPACH, RICHARD 15 BEECHNUT LANE WILLINGBORO, NJ 08046	0.76	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0
43	414/34	WINDOVER LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	4.14	UTILITY LINE	0.0
44	415/27	CLUB HOUSE DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	0.28	UTILITY LINE	0.0
45	421/5	CLUB HOUSE DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	0.04	UTILITY LINE	0.0
46	421/41	ROBERTS AVENUE	ALSPACH, RICHARD & DEBORAH 15 BEACHNUT LANE WILLINGBORO, NJ 08046	0.55	PARCEL IS NOW DEVELOPED WITH A RESIDENTIAL STRUCTURE	0.0
47	518/15	85 MANOR LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	1.57	UTILITY LINE	0.0
48	521/23	MILLBROOK DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	5.44	UTILITY LINE	0.0

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	RDP
49	523/2	MILLBROOK DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	4.29	UTILITY LINE	0.0
50	523/52	JOHN F KENNEDY WAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	4.03	UTILITY LINE	0.0
51	608/83	HOLBROOK LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	1.81	UTILITY LINE	0.0
52	608.157	HAWLEY PLACE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	1.33	UTILITY LINE	0.0
53	608/159	VAN SCIVER PARKWAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	1.58	UTILITY LINE	0.0
54	608/162	VAN SCIVER PARKWAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	9.69	UTILITY LINE	0.0
55	623/23 & 24	HAZELWOOD CIRCLE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	9.93	UTILITY LINE	0.0
56	633/11	LEVITT PARKWAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	2.76	UTILITY LINE	0.0
57	637/12	HOLBROOK LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	3.29	UTILITY LINE	0.0
58	701/25	LEVITT PARKWAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	0.36	UTILITY LINE	0.0
59	819/10	45 EAST STOKES ROAD	MABLE, WAYNE & DORIS 45 EAST STOKES ROAD	0.31	PARCEL IS NOW DEVELOPED WITH A RESIDENTIAL STRUCTURE	0.0
60	840/29	21 EXCELL LANE	MEHTA, DHIREN 27 UPTON WAY SEWELL, NJ 08080	0.26	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	0.0

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments
61	901/75; 901/79.01	RIVERVIEW PLACE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	1.31	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
62	901/75	RIDGE VIEW PLACE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	1.0	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
63	901/137	RITTENHOUSE COURT	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.26	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
64	901/198	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.32	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
65	901/240	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.0	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
66	901/244.01	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.64	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
67	902/41	RICHMOND PLACE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.89	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
68	902/102	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	1.97	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
69	902/170	RAEBURN LANE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.85	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
70	902/133	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.84	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT
71	903/80	RITTENHOUSE DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.83	OPEN SPACE/COMMON AREA OF THE RITTENHOUSE PARK DEVELOPMENT

Net

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	RDP
72	903/35	ROCKLAND DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.8	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
73	904/83	RADFORD PLACE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.91	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
74	904/42	RITTENHOUSE DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	1.52	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
75	905/29	REGENT COURT	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	2.05	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
76	905/43	RITTENHOUSE DRIVE	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.65	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
77	905/57	PINE STREET	RITTENHOUSE PARK COMMUNITY ASSOC PO BOX 309 WILLINGBORO, NJ 08046	0.3	OPEN SPACE/Common AREA OF THE RITTENHOUSE PARK DEVELOPMENT	0.0
78	1003/177.02	421 VANSICVER PARKWAY	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	3.30	UTILITY LINE	0.0
79	1003/ 179	NEW CASTLE LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	2.93	UTILITY LINE	0.0
80	1019/101	NEW CASTLE LANE	TOWNSHIP OF WILLINGBORO 1 SALEM ROAD WILLINGBORO, NJ 08046	1.43	APPROPRIATE FOR RESIDENTIAL DEVELOPMENT; 6-8 DWELLING UNITS PER ACRE	2.3
81	1020/ 111	NORTHAMPTON DRIVE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	2.29	UTILITY LINE	0.0
82	1020/112	NOBLE PASS	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	1.14	UTILITY LINE	0.0

Net

Parcel	Block/Lot	Location	Owner/Street/City, State, Zip	Area (acres)	Comments	
83	1023	45	MEHTA, DHIREN 27 UPTON WAY SEWELL, NJ 08080	0.23	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	
84	1023/54	NIAGARA LANE	PUBLIC SERVICE ELECTRIC & GAS CO 80 PARK PL-CORP PROP 6FLR NEWARK, NJ 07102	22.60	UTILITY LINE	
85	1105/14	85 THORNHILL LANE	MEHTA, DHIREN	0.28	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	
86	1114/23	BRIEL, MARGARET	23 BEECHNUT LANE	0.06	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	
87	1130/15	BRIDGE STREET	GEHIN-SCOTT, GILBERT A & RUTH M BOX 182 RANCOCAS, NJ 08073	0.23	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	
88	1131/3	23 TWISTING LANE	LUCAS, EULER 120 ELM STREET BEVERLY, NJ 08010	0.24	INSUFFICIENT SIZE FOR INCLUSIONARY DEVELOPMENT	
89	1202/126	FIRESIDE COURT	FAIRMOUNT PARK HOMEOWNERS ASSOC PO BOX 239 WILLINGBORO, NJ 08046	1.58	OPEN SPACE/COMMON AREA OF THE FAIRMOUNT PARK DEVELOPMENT	
90	1202.01/127	FELTER PLACE	FAIRMOUNT PARK HOMEOWNERS ASSOC PO BOX 239 WILLINGBORO, NJ 08046	0.27	OPEN SPACE/COMMON AREA OF THE FAIRMOUNT PARK DEVELOPMENT	
Total:				236.55	30.98	67.58

*Nonresidential zoning

Appendix 2
Land Use Map

Appendix 3
Owner Occupied Properties Rehabilitated in Willingboro
Township: 01/01/99 to 09/03/15

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
277 Northampton Drive	5/24/1999	Amortized	1	Low	\$6,560	Loan paid off. Records purged
43 Club Ridge Road	5/26/1999	Amortized	1	Low	\$17,750	Loan paid off. Records purged
7 Mandolin Lane	5/27/1999	Deferred	2	\$21,150 Very Low	\$18,143	Roof, concrete front walkway, new driveway, new vinyl windows, new complete bathroom, smoke detectors
53 Hampshire Lane	8/25/1999	Amortized	2	Low	\$17,000	Loan paid off. Records purged
6 Hasting Lane	10/28/1999	Deferred	2	\$35,600 Low	\$20,000	Paint and repair complete exterior. New front and rear doors, new sliding door, new vinyl windows throughout. New kitchen cabinets, counter top and floor
19 Earnshaw Lane	11/1/1999	Deferred	1	\$18,500 Very Low	\$20,000	New asphalt driveway, front and rear cement wheelchair ramps. New handicapped kitchen, new rear sliding door, bathroom accessibility, handicapped shower. Paint bathroom.
83 Buckingham Drive	12/8/1999	Amortized	1	Low	\$20,000	Loan paid off. Records purged
30 Potter Lane	2/9/2000	Amortized	3	\$38,100 Low	\$14,170	Paint and repair complete exterior, new vinyl windows throughout, new asphalt driveway, new front and storm door. New gas boiler.
49 Budhollow Lane	3/29/2001	Deferred	2	\$37,000 Low	\$10,673	New roof, new gutters, new asphalt driveway, bedroom door.
99 Southampton Drive	3/31/2001	Deferred	3	\$41,600 Low	\$13,116	New siding, new roof, removal of three trees, electrical certification, new front door, new sliding door, new windows throughout. New kitchen cabinets, paint on bedroom.
21 Gimble Lane	6/5/2001	Deferred	1	\$32,350 Low	\$19,686	Vinyl siding, new gutters, new garage door, new metal front and rear doors, remove 2 trees and stumps. New windows, new sliding glass door, new carpet, 3 rooms, new bathroom vent fan.
27 Midvale Lane	6/26/2001	Deferred	4	\$27,800 Very Low	\$14,264	New roof, paint exterior, vinyl windows throughout
32 Palfrey Lane	12/24/2001	Deferred	2	\$37,000 Low	\$19,150	New gutters and fascia, paint exterior, new steel front door, new kitchen cabinets, paint kitchen, new counter top, 4 sliding closet doors, kitchen range hood, paint dining room, new bathroom floor, new carpet in stairway and living room.

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/31/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
50 S. Sunset Road	12/24/2001	Deferred	5	\$31,200 Very Low	\$20,000	Repair walls throughout, paint family room, kitchen, hallway, dining room, 3 bedrooms, 4 new bedroom doors, new kitchen cabinets. Fire rated laundry room door, new light dining room, new master bath (complete), paint main bath, new tub surround.
134 Somerset Drive	6/6/2002	Deferred	1	\$20,250 Very Low	\$20,000	New roof, new windows throughout, electrical certification, new gutters, new kitchen cabinets and floor, paint one bedroom.
10 Bancroft Lane	10/11/2002	Amortized	1	\$21,050 Very Low	\$11,926	New roof, 2 bifold doors, vent gas dryer, new a/c unit.
14 Bayberry Lane	10/29/2002	Amortized	4	\$48,100 Very Low	\$6,220	New front storm door, new hot water heater, repair kitchen window sills, 2 floor bathroom, tub and surround, repair walls and paint, master bath, drywall, shower stall and paint.
4 Edgemont Lane	5/20/2003	Amortized	2	\$40,500 Low	\$20,000	New asphalt driveway, remove two trees, new front and rear doors and storm doors. 6 new shutters, all new fascia (front and rear) new gutters and splash blocks, all new windows, prep and paint entire house.
55 Ballad Lane	5/20/2003	Deferred	1	\$22,150 Very Low	\$20,000	Termite rear wall repair. Termite repair dining room, new garage door, electric repair. Prep and paint kitchen, new sliding door, prep and paint dining room and two bedrooms.
9 Bancroft Lane	8/25/2003	Amortized	3	\$27,050 Very Low	\$20,000	New roof, repair and paint living room, new kitchen cabinets, stove, sink, floor. Paint kitchen. New suspended ceiling, right rear room and paint and flooring. Family room paint. New rear and storm door, sewing room repair, paint and new carpet. New bathroom (complete), new master bath (complete).

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK LOAN AMOUNT	WORK COMPLETED
92 Pennypacker Drive	10/30/2003	Deferred	3	\$28,500 Very Low	\$20,000	Prep and paint exterior, new gutters and downspouts, new metal front and rear doors, new tub, faucet and shower basin. All trim wrapped in aluminum. New roof, new kitchen cabinets, countertop, stove, sink, floor, paint kitchen.
66 Pinetree Lane	12/29/2003	Deferred	1	\$23,850 Very Low	\$5,075	New concrete walkway to front door, 5 new windows, new sliding door, new tub and shower and faucets. Bathroom wall repair.
48 Poffter Lane	4/8/2004	Amortized	2	\$43,650 Low	\$20,000	New gutters, new vinyl siding, new steel garage door, new front and rear entrance door and storm door, repave asphalt driveway, 4 new interior doors, new roof, replace wood trim, 3 windows, paint hallway, new toilet and vanity, new vinyl shutters.
19 Roxborough Place	5/3/2004	Amortized	1	\$38,200 Low	\$16,355	New steel door, new storm door (front and rear), new sliding door, new rear heater room door. Prep and paint house shingles only, new front walkway, new windows, 3 new closet doors, paint bedroom.
10 Gardenbrook Lane	6/17/2004	Amortized	1	\$23,850 Low	\$20,000	Prep and paint exterior, new garage doors and opener, new shutters, repair fascia, new asphalt driveway, new sliding door, new windows, new kitchen cabinets, countertop, range hood, repair garage ceiling, new shower/diverter.
28 Pebble Lane	8/2/2004	Amortized	1	\$23,850 Low	\$19,862	New roof, new gutters, new front and rear entrance and storm doors, front and rear wheelchair ramps, new kitchen cabinets, new countertop, new sink and hardware, new floor, new front knob on stove, new windows, handicapped shower stall, new medicine cabinet, one new passage door, bathroom vent fan, new attic steps, 1 carbon monoxide detector, 2 smoke detectors, insulated pipes.

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
23 Hillcrest Lane	12/8/2004	Amortized	3	\$45,600 Low	\$20,000	New window, new rear roof, new gutter rear, new a/c unit, certify electric, new steel front door. Repair hose bib, discharge tube, 2 sliding doors, repair and paint treat room, new bathroom door.
28 Midfield Lane	1/23/2005	Grant	2	Very Low	\$4,540	Heater Replacement
5 Mandolin Lane	1/24/2005	Grant	3	Very Low	\$5,000	Heater Replacement
18 Mandolin Lane	1/24/2005	Grant	4	Very Low	\$4,500	Heater Replacement
9 Bolton Lane	2/1/2005	Grant	5	Very Low	\$5,000	Heater Replacement
40 Botany Lane	2/2/2005	Grant	3	Low	\$4,505	Heater Replacement
129 Pheasant Lane	2/2/2005	Grant	1	Low	\$4,370	Heater Replacement
45 Babbitt Lane	2/5/2005	Grant	2	Low	\$5,000	Heater Replacement
164 Millbrook Drive	2/7/2005	Grant	6	Very Low	\$4,500	Heater Replacement
12 Palfrey Lane	2/12/2005	Grant	2	Low	\$4,100	Heater Replacement
34 Blueberry Lane	2/17/2005	Grant	2	Extremely Low	\$4,550	Heater Replacement
20 Buttercup Lane	2/25/2005	Grant	3	Extremely Low	\$2,640	Heater Replacement
31 Bendix Lane	3/4/2005	Grant	2	Low	\$5,000	Heater Replacement
44 Shelbourne Lane	3/5/2005	Grant	2	Low	\$4,370	Heater Replacement
62 Triangle Lane	3/14/2005	Grant	2	Extremely Low	\$5,000	Heater Replacement
67 Parkside Circle	4/5/2005	Grant	5	Low	\$3,800	Heater Replacement
15 Marblestone Lane	6/13/2005	Grant	3	Very Low	\$5,000	Heater Replacement
1 Montclair Lane	1/6/2006	Grant	2	Very Low	\$4,700	Heater Replacement
53 Twisting Lane	1/12/2006	Grant	2	Low	\$2,215	Heater Replacement
15 Montclair Lane	1/25/2006	Grant	2	Very Low	\$4,700	Heater Replacement
84 Gaffney Lane	1/30/2006	Grant	2	Low	\$2,450	Heater Replacement
18 Stirrup Lane	2/9/2006	Grant	2	Very Low	\$4,600.00	Heater replacement
1 Roanoke Court	5/10/2006	Grant	1	Extremely Low	\$2,798.00	Heater replacement
79 Buckingham Dr.	8/30/2006	Grant	2	Very Low	\$5,780.00	13 replacement windows, repair front storm door, 2 closet doors master bath, anti-scald faucet master bath
150 Nottingham Drive	9/1/2006	Grant	8	Very Low	\$3,600.00	Heater replacement
9 General Lane	12/7/2006	Grant	1	Very Low	\$4,185.00	Heater replacement
55 Beaverdale Lane	1/18/2007	Grant	5	Very Low	\$4,300.00	Heater Replacement

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
99 Southampton Drive	7/13/2007	Grant	4	Low	\$20,000.00	13 replacement windows, new garage door, prep and paint kitchen, 2 new bathtubs, 2 new floors bathrooms, prep and paint 2 bathrooms; prep and paint hallway Interior paint family room, 2nd floor bath master bath. Exterior paint bow window front porch and garage fascia/soffit and garage door. Install 4 GFI, replace heating and air conditioning, replace toilet, sink and faucets
30 Hancock Lane	9/27/2007	Grant	2	Low	\$20,000.00	Heater Replacement
52 Earnshaw Lane	11/29/2007	Grant	1	Very Low	\$5,000.00	New front door, 21 replacement windows, repair and paint garage windows
43 Tiffany Lane	12/11/2007	Grant	1	Very Low		13 vinyl replacement windows, new tile floor, replace 3 GFI, replace kitchen sink drain assembly, repair leaks and water damage 2 bathrooms, repair soffit, replace entrance and storm door, repair siding
56 Charleston Rd.	12/12/2007	Grant	1	Very Low	\$18,025.00	16 vinyl replacement windows, repair termite damage, replace 3 GFI, interior paint, new tub surround, new roof
54 Briardale Lane	6/10/2008	Grant	2	Low	\$20,000.00	

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
26 Edington Lane	6/17/2008	Deferred	2	Low	\$19,976.00	13 new windows, interior paint, new sink faucet, new medicine cabinet, new roof fan, new slider door. Repair soffit, new rear door and storm door, replace main sewer line, repair loose shingles
122 Somerset Drive	1/20/2009	Grant	2	Low	\$4,900.00	Heater Replacement
86 Pennypacker Drive	3/30/2009	Grant	3	Low	\$5,000.00	Heater Replacement
27 Bosworth Lane	6/15/2009	Deferred	2	Low	\$20,000.00	19 new windows, new entry door, new furnace and a/c. New hot water heater. New driveway, replace 45 electrical outlets, new dining room light, new front storm door
27 Montrose Lane	7/6/2009	Deferred	2	Low	\$20,000.00	paint kitchen, new range hood, new kitchen cabinets, 3 GFIs, new tub, tile, sink, vanity, faucet and drain. New toilet, new vinyl floor, new roof, repair fascia.
7 East Lane	10/5/2009	Deferred	1	Very Low	\$16,128.00	Paint entire interior, 3 GFIs, 1 new window, new entrance door, new rear screen door, repair and cap garage window, new electric service, repair broken section of walkway, new flooring throughout.
45 Babbitt Lane	10/14/2009	Deferred	2	Low	\$17,295.00	8 new windows, new vent fan, new vanity, sink, faucet and drain. New roof, new gutters and downspouts, power wash and paint entire exterior, new attic fan, new entry and storm door

**OWNER OCCUPIED PROPERTIES
REHABILITATED IN WILLINGBORO TOWNSHIP
01/01/99 to 9/3/15 (Present)**

ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	RUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
16 Placid Lane	2/2/2010	Deferred	2	Very Low	\$19,897.00	26 new windows, 3 GFIs, new main breaker box, paint kitchen and dining room, new electric circuit to washer, new bathroom vent fan, repair and paint front porch, new range top.
16 Stafford Lane	4/10/2010	Deferred	2	Very Low	\$20,000.00	6 new windows, new kitchen cabinets, new sink faucet, 3 new outlets, new roof, new gutters and downspouts, new rear door, repair and cap fascia
53 Pennant Lane	4/21/2010	Deferred	2	Low	\$19,870.00	5 new windows, new toilet, new shower, new CO2/smoke detector, new breaker box, remove and replace rear concrete patio and sidewalk. New roof.
10 Pageant Lane	5/19/2010	Deferred	4	Low	\$19,865.00	New gas range, repair kitchen counter-top, new garage door, repair termite damage, termite treatment entire house. New gutters and downspouts, new roof, prep and paint bathroom and 12 bedrooms. New baseboard heat covers, 1 new GFI
86 Holystone Lane	10/25/2010	Deferred	2	Very Low	\$20,000.00	New bathroom vent fan, new shower base and walls, new gas furnace & a/c, new hot water heater, new breaker box and service cable, new roof, new roof fan.

OWNER OCCUPIED PROPERTIES						
REHABILITATED IN WILLINGBORO TOWNSHIP						
01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
17 Ridgerview Place	3/15/2011	Deferred	1	Low	\$8,175.00	New front picture window, new electric service for range, 3 GFIs, 2 co2/smoke detectors, new kitchen floor, new attic insulation, new rear entrance and storm doors, new slider door.
19 Sandal Lane	8/5/2011	Deferred	1	Very Low	\$20,000.00	10 new windows, new roof, paint front left exterior, remove rear gutter, repair cap and reinstall, 2 co2/smoke detectors. New slider door, repair moldy drywall in den. New utility room floor, reinstall closet doors, replace bathroom sink drain, new floor tiles in den, new tub surround, new front storm door.
15 Buxmont Lane	11/2/2011	Deferred	2	Extremely Low	\$12,550.00	new furnace stack and roof, new breaker box; dedicated circuit to kitchen; new main electrical service cable

OWNER OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
145 Hazelwood Circle	12/20/2011	Deferred	1	Very Low	\$17,745.00	paint walls, ceiling and trim in living room, kitchen and utility room; paint and repair water leak in hallway bathroom; paint ceiling, walls, trim and closets in bedrooms; replace access panel; front and rear outlet and light; new gutters, downspouts, fascia and capping; seal concrete; replace main breaker box and service cable; replace front storm door; rescreen rear slider door; replace rear water faucets; install smoke detectors; new hot water tank; replace countertop electric outlets with GFIs in kitchen and bath; replace outlets, switches and certify distribution; run circuit to garage door opener; add switch to garage light; add rear exterior photocell light, replace front metal light pot and light; repair front porch concrete cap and post on front porch.

OWNER OCCUPIED PROPERTIES						
REHABILITATED IN WILLINGBORO TOWNSHIP						
01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
22 Helm Turn	12/21/2011	Deferred	4	Low	\$20,000.00	paint walls, ceiling and trim in bathroom; replace diverter and showerhead; install fiberglass surround; install vanity with sink, faucet and drain; clean and grout floor tile. Install laminate floor and trim in dining room and front hallway; paint kitchen walls; trim and ceiling; seal ceramic floor tile; grout; remove and replace master bath shower base, surround, diverter, faucet, showerhead and vanity sink faucet. Paint doors in bedroom and replace electrical outlet; install carpet in three closets; repair hallway carpet; install baseboards in hallway; install 220 outlet for dryer; electrical switch for attic fan; repair walls around main breaker box and paint; clean ventilation system; remove and replace exterior water faucet; install overhead lights and secure wall outlet in kitchen

**OWNER OCCUPIED PROPERTIES
REHABILITATED IN WILLINGBORO TOWNSHIP
01/01/99 to 9/3/15 (Present)**

ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
15 Montclair Lane	2/28/2012	Deferred	3	Very Low	\$19,954.00	Windows replaced; replaced sink faucet and drain; repair broken tiles in tub surround and regrout; repair toilet; replace overhead vent; electrical outlets and switches replaced; replace garage door; porch ceiling painted; roof replaced and ridge vents installed; replaced gutters and downspouts; replaced rear slider door; replaced main breaker box; dryer vented to outside
44 Marchmont Lane	10/24/2012	Deferred	3	Low	\$20,000.00	new roof; replace main sewer line; replace driveway; windows throughout; paint kitchen and dining room ceiling; replace kitchen drain; overhead light and vent fan in first floor bath; light assembly in master bath; light assembly and secure wall box in hallway bath; reattach gutter and dryer vent cap; extend hot water heater vent valve pipe; install smoke detectors; stretch carpet in living and dining rooms

OWNER-OCCUPIED PROPERTIES REHABILITATED IN WILLINGBORO TOWNSHIP 01/01/99 to 9/3/15 (Present)						
ADDRESS	DATE COMPLETED	TYPE OF LOAN	# PERSONS	HUD INCOME LIMIT	COST OF WORK/ LOAN AMOUNT	WORK COMPLETED
32 Haskell Lane	2/21/2013	Deferred	1	Low	\$17,813.00	Kitchen and dining room: install new drywall and paint; range; flooring. Bathroom: vent fan; outlet; paint ceiling, wells and trim; window and drain repair. Garage: paint walls and ceiling. Bedrooms: windows. Porch: paint; repair soffit and gutter. Replace storm and entrance front door; insulate attic
100 Torrington Lane	1/24/2014	Deferred	1	Low	\$18,456.00	repair and paint concrete front porch; replace gutters; paint siding and trim; replace front storm door; install attic access door; replace and paint hallway closet door; install new electrical outlet
46 Parish Lane	10/7/2014	Deferred	2	Low	\$17,433.00	living room ceiling repair; new range hood; gfi outlets; recaulk tub and surround; paint; replace bedroom floor; replace baseboard heat in bedroom; replace entrance door; new roof, new gutter and downspouts; rear slider door; secure and grout front patio stone
					\$1,019,235	
					80 Loans	
					Average loan: \$12,740	

Appendix 4
Willingboro Township Rehabilitation Program: Promotional
Brochure with Listing of Rehabilitated Units



A Naturally Better Place to Be.

WILLINGBORO TOWNSHIP HOUSING REHABILITATION PROGRAM

Is your property in need of repairs? If so, you may qualify to participate in a housing rehabilitation program to provide home repair loans to low- and moderate-income homeowners and landlords. The program is being implemented by Triad Associates on behalf of Willingboro Township, utilizing COAH Municipal Trust Funds. The Program offers:

Loans to Homeowners

Assistance to homeowners will be available in the form of a 0% interest deferred payment loan which is payable back to the Township when title to the property transfers to someone other than the original owner.

To qualify, homeowners must have total gross household income by family size at or less than the amounts listed below. To determine household income the homeowner must present proof of income derived from any source for all residents in the house. In addition to meeting the total household income requirement, property taxes must be current; the property must be covered by homeowner's insurance, and a recorded deed indicating the property owner(s) must be presented:

<u>Family Size</u>	<u>Income*</u>	<u>Family Size</u>	<u>Income*</u>
1	\$45,024	5	\$69,466
2	\$51,456	6	\$74,611
3	\$57,888	7	79,757
4	\$64,320	8	84,902

* Income guidelines adjusted annually

Eligible Repairs

Code related items and weatherization needs will be addressed by priority starting with the major systems (roofs, heating, plumbing, electrical). Additions and interior decorating are not eligible.

How To Apply

Triad Associates has been designated by Willingboro Township to act as the program Administrative Agent to qualify and assist applicants through the home improvement process. Interested persons are to call Michael Borrero at Triad Associates, at 609-261-3344 to request an Application. Applications are also available at the Willingboro Township Municipal Building and at www.willingborotwp.org



WILLINGBORO TWP, BURLINGTON County - Muni Code: 0338

Housing Activity-Rehabilitation

Date	Address	Description	Amount
03/25/2013	86 Eastbrook Lane	Upgrade electrical, replace windows, replace dway	15,820.00
04/12/2013	38 Eastgate Lane	upgrade electrical, install hwh, repl toilets,	10,268.00
06/06/2013	5 Buttercup Lane	upgrade elec, new windows rep fascia, rep hw regis	13,473.00
07/12/2013	4 Douglas Court	Install hwh, repl walkway, repl roof	9,600.00
03/14/2014	18 Edgewater Lane	200 amp service, replace light fixtures	13,070.00
03/19/2014	129 Pheasant Lane	upgrade elec, roof, gutter, downspouts, fascia	24,405.00

Appendix 5
Spending Plan: Approved by Council on Affordable
Housing Resolution Dated June 13, 2012

Willingboro Township Affordable Housing Trust Fund Spending Plan

INTRODUCTION

The Township of Willingboro, Burlington County has prepared a Housing Element and Fair Share Plan in accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.), the Fair Housing Act (N.J.S.A. 52:27D-301) and the affordable housing regulations of the New Jersey Department of Community Affairs (the Department) (N.J.A.C. 5:97-1 et seq. and N.J.A.C. 5:96-1 et seq.). A development fee ordinance creating a dedicated revenue source for affordable housing was adopted by the Township on April 24, 2007 and approved by the Court on May 18, 2007. An amended development fee ordinance was adopted by the municipality on December 22, 2008 and subsequently approved by the Court on April 2, 2009. The ordinance establishes the Township of Willingboro's affordable housing trust fund for which this spending plan is prepared.

As of September 30, 2011, the Township of Willingboro has collected \$110,654.02, expended \$0.00, resulting in a balance of \$110,654.02. The Township anticipates an additional \$141 in interest in the last quarter of 2011 for a total balance on December 31, 2011 of \$110,795. All development fees, payments in lieu of constructing affordable units on site, funds from the sale of units with extinguished controls, and interest generated by the fees are deposited in a separate interest-bearing affordable housing trust fund in Beneficial Bank, located at 611 Beverly-Rancocas Road, Willingboro, New Jersey 08046, for the purposes of affordable housing. These funds shall be spent in accordance with N.J.A.C. 5:97-8.7-8.9 as described in the sections that follow.

1. REVENUES FOR CERTIFICATION PERIOD

To calculate a projection of revenue anticipated through December 31, 2018, the Township of Willingboro considered the following:

- (a) Development fees:
 - 1. Residential and non-residential projects which have had development fees imposed upon them at the time of preliminary or final development approvals;
 - 2. All projects currently before the planning and zoning boards for development approvals that may apply for building permits and certificates of occupancy; and
 - 3. Future development that is likely to occur based on historical rates of development.

(b) Payment in lieu (PIL):

Actual and committed payments in lieu (PIL) of construction from developers as follows:

To date, there are no actual or committed payments in lieu (PIL) of construction from developers.

(c) Other funding sources:

Funds from other sources, including, but not limited to, the sale of units with extinguished controls, repayment of affordable housing program loans, rental income, proceeds from the sale of affordable units, as well as funds which may be realized pursuant to the Final Settlement Agreement in the matter of Atlantic Delta Corp. and the Township of Willingboro and the Planning Board of the Township of Willingboro.

(d) Projected interest:

Interest on the projected revenue in the municipal affordable housing trust fund at the current average interest rate, which rate being 0.50%.

SOURCE OF FUNDS	PROJECTED REVENUES-HOUSING TRUST FUND - 2011 THROUGH 2018									
	2011	2012	2013	2014	2015	2016	2017	2018		
(a) Previous Year Balance		\$110,795	\$113,874	\$116,968	\$120,077	\$181,014	\$189,493	\$198,014		
(b) Development fees:										
Approved Development										
Development Pending Approval										
Projected Development		\$2,512	\$2,512	\$2,512	\$7,536	\$7,536	\$7,536	\$7,536		\$7,536
(c) Payments in Lieu of Construction										
(d) Other Funds (Specify source(s))					\$52,500*					
(e) Interest		\$567	\$582	\$597	\$901	\$943	\$985	\$1,028		
Total	\$110,795	\$113,874	\$116,968	\$120,077	\$181,014	\$189,493	\$198,014	\$206,578		

*Per the Atlantic Delta Corp. Final Settlement Agreement, the Plaintiff is to construct 35,000 square feet of commercial development and pay a sum of \$35,000.00 for each unit of obligation above 2.5 generated by the commercial development. Utilizing the factor for square feet generating one affordable unit for the M - Mercantile Use Group of 9,412, an obligation of 4 units (with rounding) is generated (35,000 square feet/9,412 square feet = 3.7). As such, the fee to be paid would be \$35,000 x (4 - 2.5) = \$52,500.

The Township of Willingboro projects a total of \$206,578.00 in revenue to be collected between January 1, 2011 and December 31, 2018. All interest earned on the account shall accrue to the account to be used only for the purposes of affordable housing.

2. ADMINISTRATIVE MECHANISM TO COLLECT AND DISTRIBUTE FUNDS

The following procedural sequence for the collection and distribution of development fee revenues shall be followed by the Township of Willingboro:

(a) Collection of development fee revenues:

Collection of development fee revenues shall be consistent with the Township of Willingboro's development fee ordinance for both residential and non-residential developments in accordance with COAH's rules and P.L.2008, c.46, sections 8 (C. 52:27D-329.2) and 32-38 (C. 40:55D-8.1 through 8.7).

(b) Distribution of development fee revenues:

Distribution of development fee revenues shall be determined by the Township Manager in accordance with the Housing Element and Fair Share Plan Element Spending Plan as approved by the Court.

3. DESCRIPTION OF ANTICIPATED USE OF AFFORDABLE HOUSING FUNDS

(a) **Rehabilitation and new construction programs and projects (N.J.A.C. 5:97-8.7)**

The Township of Willingboro will dedicate \$103,289.00 to fund hard costs for the rehabilitation of rental units, operated by the Township in the absence of a County program and administered via a contractual agreement with a qualified administrative agent:

Rehabilitation program: \$103,289.00

(b) Affordability Assistance (N.J.A.C. 5:97-8.8)

AFFORDABILITY ASSISTANCE CALCULATION

Actual development fees through 9/30/11		\$110,098
Actual interest earned through 9/30/11	+	\$ 556
Projected interest 4 th Quarter 2011	+	\$ 141
Development fees projected 2012-2018	+	\$ 90,180
Interest projected 2012-2018	+	\$ 5,603
Less housing activity expenditures through 6/2/2008	-	\$ 0
Total	=	\$206,578
Calculate 30 percent	x .30 =	\$ 61,973
Less Affordability assistance expenditures through 9/30/11	-	\$ 0
PROJECTED MINIMUM Affordability Assistance Requirement 1/1/2011 through 12/31/2018	=	\$ 61,973
PROJECTED MINIMUM Very Low-Income Affordability Assistance Requirement 1/1/2011 through 12/31/2018	÷ 3 =	\$ 20,658

The Township of Willingboro will dedicate \$61,973.00 from the affordable housing trust fund to render units more affordable, including \$20,658.00 to render units more affordable to households earning 30 percent or less of median income by region, as follows:

The Township of Willingboro will establish a low interest loan program to be administered via contractual agreement with a qualified administrative agent. Said program will extend loans to low, very low, and moderate income households to provide affordability assistance in the form of security deposits, rental assistance, and emergency repairs funding.

(c) Administrative Expenses (N.J.A.C. 5:97-8.9)

ADMINISTRATIVE EXPENSE CALCULATION

Projected dev fees and interest 2011 thru 2018	+	\$206,578
Payments-in-lieu of construction and other deposits thru 7/17/2008	+	\$ 0
Less RCA expenditures thru 12/31/2018	-	\$ 0
Total	=	\$206,578
Calculate 20 percent	x .20 =	\$ 41,316
Less admin expenditures thru 12/31/2010	-	\$ 0
PROJECTED MAXIMUM available for administrative expenses 1/1/2011 thru 12/31/2018	=	\$ 41,316

The Township of Willingboro projects that \$41,316 will be available from the affordable housing trust fund to be used for administrative purposes. Projected administrative expenditures, subject to the 20 percent cap include the administrative costs of the administrative agent for the operation of the Township's rehabilitation of rental units program and other administrative duties typical of an administrative agent and also to underwrite professional consulting costs relating to the preparation and implementation of the Township's fair share plan.

4. EXPENDITURE SCHEDULE

The Township of Willingboro intends to use affordable housing trust fund revenues for the rehabilitation of housing units.

PROJECTS/PROGRAMS	Number of Units Projected	PROJECTED EXPENDITURE SCHEDULE 2011 -2018									
		2011	2012	2013	2014	2015	2016	2017	2018	Total	
Rehabilitation (For-Sale and Rental Units)	2-10		\$20,657.80	\$20,657.80	\$20,657.80	\$20,657.80	\$10,328.90	\$10,328.90	\$10,328.90	\$10,328.90	\$103,289
New Construction											
1.											
2.											
3.											
4.											
5.											
6.											
7.											
8.											
9.											
Total	2-10										
Affordability Assistance			\$9,700	\$9,700	\$9,700	\$8,500	\$8,124	\$8,124	\$8,124	\$8,125	\$61,973
Administration			\$7,000	\$7,000	\$7,000	\$5,902	\$4,804	\$4,804	\$4,804	\$4,806	\$41,316
Total			\$37,357.80	\$37,357.80	\$37,357.80	\$24,730.90	\$23,256.90	\$23,256.90	\$23,259.90	\$206,578	

5. EXCESS OR SHORTFALL OF FUNDS

In the event of any expected or unexpected shortfall if the anticipated revenues are not sufficient to implement the plan, the Township of Willingboro will adopt a resolution of intent to bond.

In the event more funds than anticipated are collected to implement the Fair Share Plan, or the Township of Willingboro will either reserve funds for affordable housing projects to meet a future affordable housing obligation or, in the alternative, will, if appropriate, fund the low interest loan program.

6. BARRIER FREE ESCROW

Collection and distribution of barrier free funds shall be consistent with Township of Willingboro's Affordable Housing Ordinance as set forth at _____ in accordance with N.J.A.C. 5:97-8.5.

SUMMARY

The Township of Willingboro intends to spend affordable housing trust fund revenues pursuant to N.J.A.C. 5:97-8.7 through 8.9 and consistent with the housing programs outlined in the Housing Plan Element dated November 23, 2008.

The Township of Willingboro has a balance of \$110,654.02 as of September 30, 2011 and anticipates an additional \$95,923.98 in revenues through 2018 for a total of \$206,578.00. The municipality will dedicate \$103,289.00 to underwrite a Township sponsored rehabilitation program for rental and for-sale units, \$61,973.00 to render units more affordable, and \$41,316.00 to administrative costs. Any shortfall of funds will be offset by bonding. The municipality will dedicate any excess funds or remaining balance toward affordable housing projects to address future obligations or, in the alternative as appropriate, fund the low interest loan program.

SPENDING PLAN SUMMARY	
Balance as of September 30, 2011	\$110,654.00
PROJECTED REVENUE 2011-2018	
Development fees	+ \$ 37,680.00
Payments in lieu of construction	+ \$
Other funds	+ \$ 52,500.00
Interest	+ \$ 5,744.00
TOTAL REVENUE	= \$206,578.00
EXPENDITURES	
Funds used for Rehabilitation	- \$103,289.00
Funds used for New Construction	
1. <i>[list individual projects/programs]</i>	- \$
2.	- \$
3.	- \$
4.	- \$
5.	- \$
6.	- \$
7.	- \$
8.	- \$
9.	- \$
10.	- \$
Affordability Assistance	- \$ 61,973.00
Administration	- \$ 41,316.00
TOTAL PROJECTED EXPENDITURES	= \$206,578
REMAINING BALANCE	= \$ 0.00

Appendix 6
Order Granting Prior Round Declaratory Judgment of
Compliance, Repose from Litigation and Stay of Third
Round Obligations

JEFFREY R. SURENIAN AND ASSOCIATES, LLC
707 Union Avenue, Suite 301
Brielle NJ 08730
(732) 612-3100
Attorneys for Declaratory Plaintiffs, the Township of
Willingboro and the Planning Board of the Township of
Willingboro

FILED with the Court

FEB 28 2012

Ronald E. Boekbinder, A.J.S.C.

IN THE MATTER OF THE
APPLICATION OF THE TOWNSHIP OF
WILLINGBORO

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
COUNTY OF BURLINGTON
DOCKET NO.: BUR-L-2822-11

Civil Action
Mount Laurel

ORDER GRANTING PRIOR ROUND
DECLARATORY JUDGMENT OF
COMPLIANCE, REPOSE FROM
LITIGATION AND STAY OF THIRD
ROUND OBLIGATIONS

WHEREAS, Atlantic Delta Corporation (hereinafter "Atlantic Delta") filed a builder's remedy suit against the Planning Board of the Township of Willingboro and the Township of Willingboro (hereinafter the "Township") on June 3, 2005; and

WHEREAS, the Township entered into a settlement agreement with Atlantic Delta, which was approved via a Court order entered on June 18, 2008 after a properly noticed Fairness Hearing; and

WHEREAS, said order granted the Township immunity from further Mount Laurel lawsuits until the Township prepared and submitted, and the Court approved, a Housing Element

and Fair Share Plan (hereinafter "Affordable Housing Plan") and said immunity has not been disturbed to this day; and

WHEREAS, the Township submitted an Affordable Housing Plan to the Court, and to the Court appointed Special Master Elizabeth McKenzie, P.P., A.I.C.P. (hereinafter "Court Master"), for review and approval in December of 2008; and

WHEREAS, before the Court could approve said Affordable Housing Plan, the Appellate Division invalidated various regulations upon which the Township based its Affordable Housing Plan and validated various other regulations; and

WHEREAS, more specifically, in In re Adoption Of N.J.A.C. 5:96 and 5:97 By New Jersey Council On Affordable Housing, 416 N.J.Super. 462 (App. Div. 2010), certif. granted 205 N.J. 317 (2011), the Appellate Division validated the regulations by which COAH assigned rehab and prior cycle responsibilities to municipalities and invalidated *inter alia* the regulations COAH used to allocate fair share responsibilities for round three; and

WHEREAS, the Appellate Division specifically contemplated that a stay would be appropriate under certain circumstances because of its invalidation of the round three regulations and various other regulations:

[A]ny municipality or other interested party may apply for a stay to COAH or the court in which a Mount Laurel case is pending. Any such application should be decided in light of the status of the individual municipality's compliance with its affordable housing obligations and all other relevant circumstances. In Re Adoption of N.J.A.C. 5:96 and 5:97 by the New Jersey Council on Affordable Housing, 416 N.J. Super. 462, 476 (App. Div. 2010) (emphasis added); and

WHEREAS, various petitioners and cross petitioners sought certification of a number of issues raised by the Appellate Division's 2010 decision, and the Supreme Court accepted certification on all issues, but has still not rendered a decision; and

WHEREAS, as a result of the foregoing, neither the Court nor the Township are aware of the standards with which the Township must comply as to its third round affordable housing obligation; and

WHEREAS, in August of 2011, the Governor's "reorganization plan" abolished the Council on Affordable Housing ("COAH") and transferred all of its functions over to the Commissioner of the Department of Community Affairs ("DCA"); and

WHEREAS, the Court scheduled a Case Management Conference in the summer of 2011 in the aforementioned builder's remedy suit to determine the status of compliance; and

WHEREAS, before the Court could conduct such a conference, it learned that, due to clerical error, it had prematurely terminated the builder's remedy lawsuit under which docket the Court could have approved the rehabilitation and prior round components of the Township's fair share; and

WHEREAS, in response to the suggestion of the Court, the Township filed a Declaratory Judgment action on August 25, 2011 to give the Court jurisdiction and to thereby facilitate approval of those portions of the Township's Affordable Housing Plan the Township has indicated will (1) satisfy its rehabilitation obligation, (2) satisfy its realistic development potential ("RDP"), (3) address its "unmet need" and (4) provide a surplus of credits to satisfy at least a portion of whatever third round number is eventually assigned to the Township; and

WHEREAS, a Case Management Order was entered by the Court on October 12, 2011, which scheduled a Compliance Hearing for December 20, 2011 to entertain an approval of the prior round and rehabilitation components of the Township's Affordable Housing Plan; and

WHEREAS, pursuant to said Case Management Order, the Court required the Township to provide 45 day notice of the hearing to local housing advocates and entities on the Township's Service List; and

WHEREAS, under the supervision of the Court Master, the Township's planner performed a new vacant land analysis on October 13, 2011; and

WHEREAS, the Township adopted an Affirmative Marketing Resolution on October 25, 2011; and

WHEREAS, the Court Master submitted a Compliance Report to the Court on October 31, 2011; and

WHEREAS, the Township prepared a new Spending Plan, and submitted same to the Court for preliminary approval on November 2, 2011, and the Court Master submitted a letter to the Court on November 11, 2011 recommending preliminary approval of the Spending Plan, so that it could be sent to the DCA for final approval; and

WHEREAS, on November 4, 2011, the Township gave proper public notice and actual notice of the Compliance Hearing to the entities on the Township's Service List and the entities on the list of regional housing advocates; and

WHEREAS, the Township and its professionals submitted documentation to the Court Master on the creditworthiness of the affordable units located in the Township during the fall of 2011, and made all of these proofs, along with other related documents, available for public inspection; and

WHEREAS, the Township adopted an Affordable Housing Ordinance on December 6, 2011; and

WHEREAS, in response to the Compliance Hearing notice provided by the Township, Fair Share Housing Center ("FSHC") submitted an objection on December 1, 2011 and Salt & Light submitted an objection on December 7, 2011; and

WHEREAS, the Township responded to both objections on December 12, 2011 and also submitted a certification to the Court regarding how proper notice was filed for the December 20, 2011 Compliance Hearing; and

WHEREAS, in order to provide enough time for the Township and the objectors to work out a compromise, the Court adjourned and carried the Compliance Hearing from December 20, 2011 until February 28, 2012 at 10:00am; and

WHEREAS, because all parties appeared on the record on December 20, 2011, the original date of the Compliance Hearing, and the Court advised that no other members of the public appeared on that date, no additional public or actual notice was necessary for the rescheduled February 28, 2012 Compliance Hearing; and

WHEREAS, objector Salt & Light decided to not pursue its objection any further and notified the Court of same during a Case Management Conference held on February 1, 2012; and

WHEREAS, objector FSHC and the Township came to an accord in which FSHC indicated during the Case Management Conference held on February 1, 2012 that it's objection had been satisfied as a result of the preparation of a revised vacant land analysis reflecting 2006 conditions; and

WHEREAS, the Court Master filed a supplemental Compliance Report on February 13, 2012; and

WHEREAS, in her report, the Court Master (1) stated that the Township's plan for addressing its rehabilitation obligation is acceptable; (2) agreed with the Township's revised RDP and "unmet need" calculations; (3) approved the Township' allocation of credits to satisfy its RDP and to address its "unmet need"; (4) approved the number of credits preserved by the Township to address any future third round obligation and/or "unmet need"; (5) recommended approval of the Spending Plan and forwarding of same to the DCA for immediate approval; (6) stated that the Township is entitled to a Judgment of Compliance and Repose as to the Township's plan for addressing its rehabilitation obligation, prior round obligation and "unmet need"; and (7) recommended a stay as to the Township having to prepare, submit and seek approval of a third round Affordable Housing Plan ("Third Round Plan"); and

WHEREAS, the Court Master has recommended that Willingboro's Court-approved prior round Housing Element and Fair Share Plan be forwarded to the DCA for monitoring; and

WHEREAS, as to the Township's 53 unit Rehabilitation obligation, it already has 30 units that were rehabbed by Burlington County that are creditworthy and will address the remaining 23 units by implementing its own rehabilitation program that will be available to rental units as well as continuing to participate in the Burlington County program; and

WHEREAS, the Township has satisfied its 157 unit RDP as follows: (a) 45 credits from the already constructed and occupied 104 unit age restricted Campbell Towers project, (b) 11 credits from the CGP&H gut rehabilitation project, (c) 6 credits from the 70 family rental

affordable units under construction as part of the Weiss inclusionary project, (d) 55 group home bedroom credits and (e) 40 prior round rental bonus credits from the group home bedrooms; and

WHEREAS, the Township proposes to address its 105 unit "unmet need" as follows: (a) 26 credits from the Campbell Towers project; (b) 24 credits from a gut rehabilitation (conversion) program with Salt & Light as per the MOU entered between Salt & Light and the Township; (c) 19 credits from an additional gut rehabilitation (conversion) program to be undertaken by Salt & Light upon successful completion of the initial 24 units; and (d) additional group home credits as new group homes are created in the Township; and

WHEREAS, the Township may preserve the following affordable housing credits for whatever third round obligation is assigned to the Township in the future by the Commissioner of the DCA, the Legislature or the Supreme Court: (a) 8 family rental credits from the Rose Street project; (b) up to 33 credits from the Campbell Towers age-restricted project; (c) 64 family rental credits from the Weiss inclusionary project; and (d) applicable bonus credits; and

WHEREAS, the rescheduled Compliance Hearing was held on February 28, 2012; and

WHEREAS, the following individuals appeared at the Compliance Hearing: (1) Special Court Master Elizabeth McKenzie, P.P., A.I.C.P., (2) Jeffrey R. Surenian, Esq. and Erik C. Nolan, Esq. on behalf of the Township of Willingboro and the Planning Board of the Township of Willingboro, (3) George Stevenson, P.P. of Remington & Vernick on behalf of the Township of Willingboro, (4) Kathy Packowski of Triad Associates on behalf of the Township of Willingboro and (5) Laura Smith-Denker, Esq. on behalf of Fair Share Housing Center; and

WHEREAS, no party at the Compliance Hearing objected to the relief sought by the Township; and

WHEREAS, in view of the foregoing, the Court's review of the documents submitted into evidence during the Compliance Hearing, consideration of the comments of the Township's professionals and FSHC's attorney, and consideration of the Court Master's report and testimony,

IT IS on this 28th day of February, 2012 ORDERED as follows:

1. The Township of Willingboro is entitled to a Judgment of Compliance and Repose as to its rehabilitation share and prior round obligation.
2. This case is dismissed without prejudice. The Township of Willingboro and its planning board are hereby granted a stay of third round compliance procedures and proceedings, subject to the Township's compliance with the terms, conditions and directives herein.
3. The Township and its planning board, are hereby granted continued immunity from Mount Laurel lawsuits until the date for submission of a third round compliance plan, if any, once established by regulation, statute, or decision of a court with appropriate jurisdiction, provided that immunity will without further order of the Court be extended for 60 days past the date for submission of a third round compliance plan upon the filing by the Township of a duly adopted and endorsed housing element and fair share plan for the third round, which 60-day period is intended to provide the Township with sufficient time to demonstrate to the Court that it is entitled to a further period of repose.
4. As to the Township's 53 unit rehabilitation obligation, the Township has established that it already has 30 units that were rehabilitated by Burlington County that are creditworthy, and that it will address the remaining 23 units by implementing a rehabilitation program available to rental units and continuing to participate in the Burlington County program.

5. The Township has satisfied its 157 unit RDP as follows: (a) 45 credits from the already constructed and occupied 104 unit age restricted Campbell Towers project, (b) 11 credits from the CGP&H gut rehabilitation project, (c) 6 credits from the 70 family rental affordable units under construction as part of the Weiss inclusionary project, (d) 55 group home bedroom credits and (e) 40 prior round rental bonus credits from the group home bedrooms.

6. The Township will be addressing its 105 unit "unmet need" as follows: (a) 26 credits from the Campbell Towers age-restricted housing project; (b) 24 credits from a gut rehabilitation program with Salt & Light as per the MOU entered between Salt & Light and the Township; (c) 19 credits from an additional gut rehabilitation (conversion) program to be undertaken by Salt & Light upon successful completion of the initial 24 units; and (d) additional group home credits as new group homes are created in the Township.

7. The Township may preserve the following affordable housing credits for whatever third round obligation is assigned to the Township by the Commissioner of the DCA, the Legislature or the Supreme Court: (a) 8 family rental credits from the Rose Street project, (b) up to 33 credits from the Campbell Towers age-restricted housing project; (c) 64 family rental credits from the Weiss inclusionary project; and (d) applicable bonus credits. If the Township is not assigned a new third round number, or if the new third round number is smaller than the number of preserved credits, the excess credits will be applied to cover any gap in the Township's remaining "unmet need."

8. Within 30 days of the entry of this order, the Township will submit to the DCA for monitoring purposes its Court approved Housing Element and Fair Share Plan and all supporting documentation that was made part of the record at the Compliance Hearing, including all adopted ordinances and resolutions, documentation of compliance with all conditions of the

order of repose (those pertaining to the implementation of the rehabilitation program may be forwarded when available), a copy of the order of repose and the letter report of the Court Master, along with a cover letter noting the requirement in the Court Order for monitoring by the DCA and the request for approval of the Spending Plan.

9. Within 180 days of the entry of this order, the Township will implement a DCA compliant rehabilitation program including the appointment of, and contract with, a qualified Administrative Agent to administer the program, preparation and adoption of a rehabilitation manual, a firm commitment to fund the program and the initial advertising of the program.

10. The Township's Spending Plan has been reviewed by the Court Master and the Court, is consistent with COAH's third round substantive rules and is hereby preliminarily approved. Since final approval of the Spending Plan must be granted by the DCA, however, the Township is hereby ordered to submit its Spending Plan to the DCA for final review and approval within 30 days of the entry of this order.

11. Elizabeth McKenzie, P.P., A.I.C.P., shall remain as Special Court Master for the Township during the period to which the Township executes the terms, conditions and directives of this Order.

12. Counsel for the Township shall forward a copy of this Order to the Special Master and counsel for Fair Share Housing Center within five (5) days of receipt.



Ronald E. Bookbinder, A.J.S.C.

Appendix 7
Order Lifting "Scarce Resource" Restraints

JEFFREY R. SURENIAN AND ASSOCIATES, LLC
707 Union Avenue, Suite 301
Brielle NJ 08730
(732) 612-3100
Attorneys for Declaratory Plaintiffs, the Township of
Willingboro and the Planning Board of the Township of
Willingboro

RECEIVED MAR 15 2012

FILED with the Court

MAR 14 2012

Ronald E. Bookbinder, A.J.S.C.

**IN THE MATTER OF THE
APPLICATION OF THE TOWNSHIP OF
WILLINGBORO**

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
COUNTY OF BURLINGTON
DOCKET NO.: BUR-L-2822-11**

**Civil Action
Mount Laurel**

**ORDER LIFTING "SCARCE
RESOURCE" RESTRAINTS**

WHEREAS, Atlantic Delta Corporation (hereinafter "Atlantic Delta") filed a builder's remedy suit against the Planning Board of the Township of Willingboro and the Township of Willingboro (hereinafter the "Township") on June 3, 2005; and

WHEREAS, Atlantic Delta made a motion that the Township's land be declared a "scarce resource"; and

WHEREAS, an order declaring land a "scarce resource" in Willingboro Township and ordering "Willingboro or its agencies" not to "grant any land use approvals on projects in excess of one (1) acre" was entered by the Court on March 10, 2006; and

WHEREAS, the Township entered into a settlement agreement with Atlantic Delta, which was approved via a Court order entered on June 18, 2008 after a properly noticed Fairness Hearing; and

WHEREAS, the Township submitted an Affordable Housing Plan to the Court, and to the Court appointed Special Master Elizabeth McKenzie, P.P., A.I.C.P. (hereinafter "Court Master"), for review and approval in December of 2008; and


WHEREAS, the Court approved the rehabilitation and prior round components of the Affordable Housing Plan via a Judgment of Compliance and Repose Order ("JOR Order") entered on February 28, 2012; and

WHEREAS, said JOR Order preserved the following affordable housing credits for whatever third round obligation is assigned to the Township in the future by the Commissioner of the DCA, the Legislature or the Supreme Court: (a) 8 family rental credits from the Rose Street project; (b) up to 33 credits from the Campbell Towers age-restricted project; (c) 64 family rental credits from the Weiss inclusionary project; and (d) applicable bonus credits; and

WHEREAS, the Court Master and the Court have agreed that since the Atlantic Delta builder's remedy lawsuit has been settled, the Court has issued a prior round Judgment of Compliance and Repose and the Township has at least 105 credits preserved for any future third round obligation, a "scarce resource" restraint on land use in the Township is no longer necessary.

IT IS on this 14th day of March, 2012 **ORDERED** as follows:

1. The March 10, 2006 Court Order imposing a "scarce resource" restraint on land use in Willingboro Township is hereby dissolved.



Ronald E. Bookbinder, A.J.S.C.