

**BOROUGH OF UPPER SADDLE RIVER
RESOLUTION #47-25
January 23, 2025**

**RESOLUTION OF THE BOROUGH OF UPPER SADDLE RIVER,
COUNTY OF BERGEN, STATE OF NEW JERSEY COMMITTING TO
ROUND 4 PRESENT AND PROSPECTIVE NEED AFFORDABLE
HOUSING OBLIGATIONS**

WHEREAS, the Borough of Upper Saddle River, County of Bergen, State of New Jersey, (hereinafter, “Upper Saddle River”) has a demonstrated history of voluntary compliance with its constitutional affordable housing obligations; and

WHEREAS, on March 20, 2024, Governor Phil Murphy signed into law P.L. 2024, c.2, an Amendment to the 1985 Fair Housing Act (hereinafter “Amended FHA” or “Act”); and

WHEREAS, the Amended FHA requires the Department of Community Affairs (“DCA”) to provide an estimate of the fair share affordable housing obligations of all municipalities on or before October 20, 2024 based upon the criteria on the Amended FHA; and

WHEREAS, the DCA issued a report on October 18, 2024 (“DCA Report”) wherein it reported its estimate of the fair share affordable housing obligation for all municipalities based upon its interpretation of the standards in the Act; and

WHEREAS, the DCA Report calculates Upper Saddle River’s Round 4 (2025-2035) fair share affordable housing obligations as follows: a Present Need (Rehabilitation) Obligation of 0 and a Prospective Need (New Construction) Obligation of 233; and

WHEREAS, the Amended FHA provides that the DCA Report is non-binding, thereby inviting municipalities to demonstrate that the Amended FHA would support revised calculations of Round 4 fair share affordable housing obligations; and

WHEREAS, the Amended FHA gives municipalities the opportunity to propose a different fair share affordable housing obligation from those reported by the DCA on October 18, 2024 based upon the standards in Sections 6 and 7 of the Act; and

WHEREAS, the Amended FHA further provides that “[a]ll parties shall be entitled to rely upon regulations on municipal credits, adjustments, and compliance mechanisms adopted by the Council on Affordable Housing (“COAH”) unless those regulations are contradicted by statute, including the Act, or binding court decisions” (N.J.S.A 52:27D-311 (m)); and

WHEREAS, COAH regulations empower municipalities to secure vacant land adjustments, durational adjustments and other adjustments; and

WHEREAS, Upper Saddle River has accepted the Present Need (Rehabilitation) Obligation of 0 as reported by the DCA in its October 18, 2024 Report; and

WHEREAS, Upper Saddle River has exercised its right to demonstrate that the data, when correctly applied, supports a lower Round 4 Prospective Need obligation than that reported by the DCA on October 18, 2024; and

WHEREAS, more specifically, Upper Saddle River maintains that its Round 4 prospective need number is 201 based upon its examination of the data used to calculate each of the three (3) allocation factors; and

WHEREAS, as to the **Equalized Nonresidential Allocation Factor**, Upper Saddle River has examined the data the DCA used to establish this factor and concluded that DCA has accurately calculated this Factor; and

WHEREAS, as to the **Income Capacity Allocation Factor**, Upper Saddle River has examined the data the DCA used to establish this factor and concluded that DCA has accurately calculated this Factor; and

WHEREAS, as to the **Land Capacity Allocation Factor**, Upper Saddle River notes that the DCA belatedly provided the data it used to establish this factor, i.e., on or about November 27, 2024 instead of by October 20, 2024; and

WHEREAS, Upper Saddle River further notes that the link to the DCA GIS data that the DCA belatedly made available to municipalities includes the following language:

"The land areas identified in this dataset are based on the best available data using publicly available data enumerated in N.J.S.A. 52:27D-304.3c.(4) to estimate the area of developable land, within municipal and regional boundaries, that may accommodate development. **It is important to note that the identified areas could be over or under inclusive depending on various conditions and that municipalities are permitted to provide more detailed mappings as part of their participation in the Affordable Housing Dispute Resolution Program.**" (emphasis added); and

WHEREAS, Upper Saddle River maintains that the areas the DCA identified as developable are indeed overinclusive and, consequently, its Professional Planner has prepared a report, attached hereto as Exhibit A, showing the lands that Upper Saddle River contends should be removed from the inventory of sites used to fashion the **Land Capacity Allocation Factor**; and

WHEREAS, it is therefore important that Upper Saddle River not commit to an incorrect obligation; and

WHEREAS, correcting the allocation factors results in Upper Saddle River's Round 4 Prospective Need Obligation being 201 rather than the obligation established by DCA; and

WHEREAS, the Amended FHA provides that: “the municipality’s determination of its fair share obligation shall have a presumption of validity, if established in accordance with sections 6 and 7” of the Act; and

WHEREAS, Upper Saddle River’s calculation of need is entitled to a “presumption of validity” because it complies with Sections 6 and 7 of the Act; and

WHEREAS, in addition to setting forth its Round 4 fair share affordable housing obligations for the reasons summarized above, substantial activity has occurred and is ongoing that warrants the reservation of certain rights to avoid any claim that it has waived them; and

WHEREAS, the process established by the Amended FHA creates an opportunity to object by interested parties opposing the obligations to which a municipality commits, thereby creating the potential for litigation over the obligations of the municipality; and

WHEREAS the court approved a vacant land adjustment (hereinafter, “VLA”) and a realistic development potential (hereinafter, “RDP”) for Upper Saddle River in Round 3; and

WHEREAS, because there has been no material change in vacant land in Upper Saddle River since the approval of its VLA and RDP, and because Upper Saddle River provided a realistic opportunity for the satisfaction of its RDP approved by the Court in Round 3, Upper Saddle River is entitled to a VLA in Round 4 and a minimal RDP in Round 4 that will be fully addressed and included in the HEFSP it submits by the June 30, 2025 deadline; and

WHEREAS, the Amended FHA requires municipalities to adopt a binding resolution no later than January 31, 2025 as to its obligations; and

WHEREAS, in light of the above, Upper Saddle River finds that it is in its best interest to declare its obligations in accordance with this binding resolution in accordance with the Act; and

WHEREAS, in addition to the above, the Director issued Directive #14-24, dated December 13, 2024, and made the Directive available later in the week that followed; and

WHEREAS, pursuant to Directive #14-24, a municipality seeking compliance certification with the Act shall file an action in the form of a declaratory judgment complaint within 48 hours after adoption of the municipal resolution of fair share obligations, or by February 3, 2025, whichever is sooner; and

WHEREAS, Upper Saddle River seeks a compliance certification with the Act and, therefore, directs its Affordable Housing Counsel to file a declaratory relief action within 48 hours of the adoption of this resolution.

NOW, THEREFORE, BE IT RESOLVED on this 23rd day of January, 2025 by the Governing Body of the Borough of Upper Saddle River, County of Bergen, State of New Jersey, as follows:

1. The preamble of this resolution is incorporated into the operative clauses of this resolution as if set forth in full.
2. For the reasons set forth in this resolution and its attachments, Upper Saddle River commits to a Round 4 Present Need (Rehabilitation) Obligation of 0 and a Round 4 Prospective Need (New Construction) obligation of 201, as set forth in the Exhibit to this Resolution, subject to all reservations of all rights, which specifically include, without limitation, the following:
 - a) The right to a vacant land adjustment, durational adjustments, and all other applicable adjustments permitted in accordance with the Act and COAH regulations;
 - b) The right to comply with the NJILGA Legislation if enacted, including the right to adjust its fair share obligations;
 - c) The right to adjust its fair share obligation in the event of any future legislation that adjusts the fair share obligations that the DCA reported on October 18, 2024;
 - d) The right to adjust its fair share obligations based upon any ruling in the Montvale Litigation or other litigation; and
 - e) The right to adjust its fair share obligations in the event of a third party challenge to the fair share obligations and Upper Saddle River’s response thereto.
3. Upper Saddle River hereby directs its Affordable Housing Counsel to file a declaratory judgment complaint in the appropriate venue within 48 hours after adoption of this resolution attaching this resolution.
4. Upper Saddle River hereby authorizes its Affordable Housing Counsel to file this resolution with the Program or any other such entity as may be determined to be appropriate.
5. This resolution shall take effect immediately, according to law.

| Councilperson | Moved | Second | Ayes | Nays | Absent | Abstain |
|---------------|-------|--------|------|------|--------|---------|
| Ditkoff | | | X | | | |
| Drennan | | X | | | | |
| Florio | | | X | | | |
| Friedlander | | | X | | | |
| Lyons | | | | | X | |
| Masi | X | | | | | |

I hereby certify that the above resolution was adopted by the Mayor and Council on January 23, 2025.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

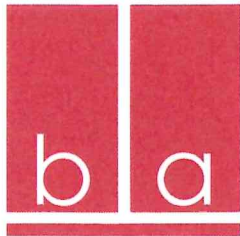
Joy C. Convertini, R.M.C., Municipal Clerk



Present and Prospective Need Analysis

Dated January 17, 2025

Borough of Upper Saddle River | Bergen County, New Jersey



Community Planning
Land Development and Design
Landscape Architecture

B U R G I S
A S S O C I A T E S , I N C .

Principals:

Joseph H. Burgis PP, AICP
Edward Snieckus, Jr. PP, LLA, ASLA
David Novak PP, AICP

Present and Prospective Need Analysis

Borough of Upper Saddle River
Bergen County, New Jersey

Prepared for the Borough of Upper Saddle River
Mayor and Council

BA# 4170.03

The original document was appropriately signed and sealed on January 20, 2025 in accordance with Chapter 41 of Title 13 of the State Board of Professional Planners



Joseph H. Burgis, AICP, PP
Professional Planner #2450

Executive Summary

The following **Present and Prospective Need Analysis** has been prepared for the Borough of Upper Saddle River in Bergen County, New Jersey.

The State of New Jersey adopted A-40/S-50 on March 20, 2024. This legislation overhauled the Fair Housing Act (FHA) by abolishing the Council on Affordable Housing (COAH) and splitting its duties between the Department of Community Affairs (DCA) and the Administrative Office of the Courts (AOC).

DCA was designated as the entity responsible for calculating the state’s regional needs as well as each municipality’s present and prospective fair share obligations. These municipal calculations, which were released on October 18, 2024, are technically advisory only. Each municipality is responsible for setting its own obligation however, they are obligated to utilize, pursuant to the legislation, the same methodology used by DCA. Municipalities are required to file their determination of their affordable housing need number by January 31, 2025 through the adoption of a resolution.

The methodology to calculate municipal prospective fair share obligation consists of three factors: the equalized nonresidential valuation factor; income capacity factor; and land capacity factor. These factors are described in greater detail in the body of this report.

The purpose of this analysis is to review DCA’s calculation of the Borough’s Present Need Obligation and Prospective Need Obligation for the years 2025 to 2035. In summary, and as reflected by Council Resolution regarding this matter, this analysis finds that the methodology utilized by the DCA to determine the Borough’s obligations was appropriately conducted in accordance with the March 8, 2018 decision of the Superior Court, Law Division, Mercer County, in re: Application of Municipality of Princeton.

However, and as described in greater detail herein, several adjustments are offered to ensure the data utilized by DCA is correct in determining the Borough’s Prospective Need Obligation. Many of these corrections relate to such issues as (1) DCA has included sites that are incorrectly identified as vacant when in fact they are developed, and (2) DCA has identified sites as vacant when they are in fact presently under construction.

As a result, the Borough’s land capacity factor has been revised. This is summarized in the following Table 1. **These corrections alter the Borough’s Prospective Need Obligation from 233 to 201 affordable units.**

Table 1: Summary of Adjusted Factors

| | Equalized Nonresidential Valuation Factor | Income Capacity Factor | Land Capacity Factor |
|------------------|---|------------------------|----------------------|
| DCA Analysis | 0.06% | 1.80% | 0.65% |
| Borough Analysis | 0.06% | 1.80% | 0.31% |

The Needs Analysis set forth herein is divided into the following sections:

† Section 1: Present Need

The first section of this analysis provides an overview of the Present Need Obligation calculated by the DCA. The Borough does not take issue with the DCA determination that the Borough's Present Need Obligation was established as zero units of obligation. Consequently, no comment is offered with respect to this issue.

† Section 2: Equalized Nonresidential Valuation Factor

Next, Section 2 of this analysis reviews the equalized nonresidential valuation factor calculated by DCA. The Borough does not take issue with the DCA determination regarding the Borough's Equalized Nonresidential Valuation Factor. Consequently, no comment is offered with respect to this issue.

† Section 3: Income Capacity Factor

Section 3 reviews the income capacity factor calculated by the DCA. It finds that the data and methodology utilized by DCA relating to the Borough's income capacity factor are both acceptable.

† Section 4: Land Capacity Factor

Finally, Section 4 reviews the land capacity factor calculated by the DCA. The analysis finds that the lands identified as being "developable" by DCA includes a number of errors. Correcting for these errors adjusts Upper Saddle River's weighted land area from 12.950 acres to 6.107 acres. This results in an adjustment of the calculated share of the region's land capacity from 0.65% to 0.31%.

Section 1: Present Need

The following section reviews Upper Saddle River's Present Need as calculated by the DCA. The Borough finds that the methodology utilized by the DCA to calculate its Present Need Obligation is acceptable.

1.1: Present Need Background

As per the adopted legislation, a municipality's Present Need obligation shall be determined:

"by estimating the deficient housing units occupied by low- and moderate-income households in the region, following a methodology similar to the methodology used to determine third round municipal present need, through the use of most recent datasets made available through the federal decennial census and the American Community Survey, including the Comprehensive Housing Affordability Strategy dataset thereof."

The "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background" workbook released by DCA (herein referred to as the "DCA Workbook" or the "Workbook") noted that the Present Need calculations used three factors to calculate its present need: the number of housing units lacking complete kitchen facilities, the number of units lacking complete plumbing facilities, and the number of overcrowded units.

The analysis employed by DCA utilizes data from HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset, which has municipal-level data on the number and percentage of low- and moderate-income households from a special tabulation of the US Census's American Community Survey (ACS) data.

For a full explanation of how this data was utilized, see the DCA Workbook.

DCA determined the Borough's Present Need number is zero units.

As per NJAC 5:93-5.2:

"Each municipality shall be provided with the Council's estimate for substandard units occupied by low and moderate income households. This estimate shall be the municipality's indigenous need, unless the municipality or an objector performs the Council's Structural Conditions Survey (see Appendix C, incorporated herein by reference). Where the municipality or objector performs the Structural Conditions Survey, the Council shall review the results of the data collected and shall modify the indigenous need if it determines a modification is warranted."

1.2: Present Need Analysis

The Borough does not take issue with the methodology utilized by the DCA to calculate its Present Need Obligation.

Section 2: Equalized Nonresidential Valuation Factor

The following section reviews the equalized nonresidential valuation factor calculated by the DCA. The Borough finds that the methodology and the data utilized by the DCA to calculate its nonresidential valuation factor is acceptable.

2.1: Basis of Calculation

As per the adopted legislation, a municipality's equalized nonresidential valuation factor shall be determined as follows:

"To determine this factor, the changes in nonresidential property valuations in the municipality, since the beginning of the round preceding the round being calculated, shall be calculated using data published by the Division of Local Government Services in the department. For the purposes of such, the beginning of the round of affordable housing obligations preceding the fourth round shall be the beginning of the gap period in 1999. The change in the municipality's nonresidential valuations shall be divided by the regional total change in the nonresidential valuations to determine the municipality's share of the regional change as the equalized nonresidential valuation factor."

2.2: Analysis of Calculation

The calculation conducted by the DCA determined that the Borough has a 0.06% share of the region's equalized nonresidential valuation.

The following table summarizes the DCA’s calculation of the Borough’s equalized nonresidential valuations from 1999 and 2023. As shown, DCA calculated an equalized nonresidential valuation change of \$20,048,966 between 1999 and 2023. When divided by the region’s total calculated nonresidential valuation change of \$32,549,128,394 for that same time period, this results in a regional share of 0.06%.

The Borough does not take issue with the methodology or the data utilized by the DCA to calculate its equalized nonresidential valuation factor.

Table 2: DCA Equalized Nonresidential Valuation Calculation Summary

| Year | Non-equalized Nonresidential Valuation | Equalization Ratio | Equalized Nonresidential Valuation |
|-------------------|--|--------------------|------------------------------------|
| 1999 | \$137,481,700 | 0.8503 | \$161,686,111 |
| 2023 | \$127,868,800 | 0.7036 | \$181,735,077 |
| <i>Difference</i> | | | \$20,048,966 |

Source: DCA Fair Share Housing Obligations for 2025-2035 (Fourth Round) Workbook

Section 3: Income Capacity Factor

The following section reviews the income capacity factor calculated by the DCA. It finds that the data and methodology utilized by the DCA relating to the Borough’s income capacity factor are both acceptable.

3.1: Basis of Calculation

As per the adopted legislation, a municipality’s income capacity factor shall be determined by calculating the average of the following measures:

“The municipal share of the regional sum of the differences between the median municipal household income, according to the most recent American Community Survey Five-Year Estimates, and an income floor of \$100 below the lowest median household income in the region; and

“The municipal share of the regional sum of the differences between the median municipal household incomes and an income floor of \$100 below the lowest median household income in the region, weighted by the number of the households in the municipality.”

The calculation conducted by the DCA determined that the Borough has a 1.80% share of the region’s income capacity factor. Table 3 summarizes the methodology utilized by DCA to determine this share.

The Borough has reviewed the data and the methodology utilized by DCA for this calculation and finds both to be acceptable.

Table 3: Income Capacity Factor

| Number of Households | Median household income in the past 12 months (in 2022 inflationadjusted dollars)* | \$100 Below Regional Median HH Income Floor | Diff. from Median Household Income Floor with Household Weight | HH Weighted Income Difference % of Region Total | Diff from Median Household Income Floor | Income Difference % of Region Total | Income Capacity Factor |
|----------------------|--|---|--|---|---|-------------------------------------|------------------------|
| 2,602 | \$234,476 | \$51,992 | \$474,823,368 | 1.4% | \$182,484 | 2.2% | 1.80% |

Section 4: Land Capacity Factor

The following section reviews the land capacity factor calculated by the DCA. It finds that while the methodology utilized by the DCA is acceptable, the data utilized to calculate the Borough’s land capacity is flawed. Specifically, the following is noted:

1. The Borough finds that the methodology utilized by the DCA to calculate its land capacity factor is acceptable. However, an analysis of the lands identified by the DCA as being “developable” includes several errors. In summary, these errors generally regarded undeveloped segments of developed properties that were identified as developable, as well as property presently under construction.
2. Correcting for these errors adjusts the Borough’s weighted land area from 12.950 acres to 6.107 acres.
3. This adjustment to the Borough’s weighted land area also adjusts the region’s weighted land area from 1,980 acres to 1,973 acres.
4. This results in an adjustment of the Borough’s calculated share of the region’s land capacity from 0.65% to 0.31%.

4.1: Basis of Calculation

As per the adopted legislation, a municipality’s income capacity factor shall be determined by:

“estimating the area of developable land in the municipality’s boundaries, and regional boundaries, that may accommodate development through the use of the ‘land use / land cover data’ most recently published by the Department of Environmental Protection, data from the American Community Survey and Comprehensive Housing Affordability Strategy dataset thereof, MOD-IV Property Tax List data from the Division of Taxation in the Department of the Treasury, and construction permit data from the Department of Community Affairs and weighing such land based on the planning area type in which such land is located. After the weighing factors are applied, the sum of the total developable land area that may accommodate development in the municipality and in the region shall be determined. The municipality’s share of its region’s developable land shall be its land capacity factor.”

Developable land that may accommodate development shall be weighted based on the planning area type in which such land is located."

The legislation identifies the primary data sources and weighing factors to utilize in calculating a municipality's land capacity factor. However, unlike the equalized nonresidential valuation factor and the income capacity factor, the legislation did not establish a delineated process to combine the aforementioned data sources into one comprehensive and coherent formula.

DCA subsequently released a workbook entitled "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background" (herein referred to as the "DCA Workbook" or the "Workbook") which established that department's interpretation on how to calculate the land capacity factor. In summary, that workbook identified the following steps:

1. First, the DCA divided the weighting regions established by the legislation by municipality.
2. Next, land use/land cover areas were used to identify vacant, developable lands. The workbook identifies the codes and descriptions of the land use/land cover data used in this process. In short, they include: cropland and pastureland; orchards/vineyards/nurseries/horticultural areas; deciduous forest areas; coniferous forest areas; plantations; mixed forest areas; old field areas; phragmites dominate old field areas; deciduous brush/shrubland; coniferous brush/shrubland; mixed deciduous/coniferous brush/shrubland; severe burned upland vegetation; and undifferentiated barren lands.
3. These initial vacant, developable lands were then refined to remove rights-of-way as well as developed properties. For the latter, the DCA utilized MOD-IV tax data and selected underlying tax parcels with property class codes for residential, commercial, industrial, apartment, railroad, and school.
4. Construction permit data was then analyzed to capture more recent development activities that may not have otherwise been reflected by the land use/land cover data or MOD-IV tax data.
5. Other limiting factors were utilized to remove initial vacant, developable lands. These include: open space, preserved farmland, category 1 waterways and wetlands (and associated buffers based on special area restrictions), steep slopes exceeding 15 percent, and open waters.
6. Due to limitations resulting from inconsistencies between data sources, the resulting mapping included instances of small land areas caused by an incongruous alignment of geospatial layers. To eliminate these "slivers" of leftover land, the DCA eliminated any feature part with an areas of less than 2,500 square feet. This presumed that a 25' by 100' foot area could be a developable property.
7. Finally, the resulting land area for each municipality was summed with the land areas for all other municipalities within each housing region to then determine the municipal percentage of land capacity for the housing region.

4.2: Analysis of Calculation

The calculation conducted by DCA determined that the Borough has 12.950 acres of developable land which accounts for a 0.65% share of the region’s developable land. Overall, the Borough finds the general methodology utilized by the DCA to calculate its land capacity factor acceptable. However, an analysis of the DCA’s resultant mapping discovered the following:

1. Other lands identified as “developable” by the DCA are located on properties with development. To eliminate “developable” lands on developable properties, the DCA had removed any lands where the underlying tax parcels had property class codes for residential, commercial, industrial, apartments, railroad, and school. However, the property classifications identified by the DCA failed to account for houses of worship, properties developed with nonprofit facilities, and properties developed with municipal and/or civic buildings.
2. There was one instances of lands identified as “developable” by the DCA being located on property which is presently under construction. This is likely due to a lag in construction permit reporting.

These discrepancies are summarized in Table 4 and are detailed in Appendix A of this analysis. Removing these lands would adjust the Borough’s weighted land area from 12.950 acres to 6.107 acres. This adjustment to the Borough’s weighted land area also adjusts the region’s weighted land area from 1,980 acres to 1,973 acres.

This results in an adjustment of the Borough’s calculated share of the region’s land capacity from 0.65% to 0.31%.

Table 4: Summary of Land Capacity Factor Analysis

| ID # | Weighted Area | Status | Weighted Area - Recalculated |
|------|---------------|-----------------|------------------------------|
| 1 | 0.28 | Developable | 0.28 |
| 2 | 3.48 | Developable | 3.48 |
| 3 | 0.14 | Not Developable | 0.00 |
| 4 | 0.07 | Not Developable | 0.00 |
| 5 | 0.33 | Not Developable | 0.00 |
| 6 | 0.13 | Not Developable | 0.00 |
| 7 | 1.04 | Developable | 1.04 |
| 8 | 1.73 | Not Developable | 0.00 |
| 9 | 1.47 | Not Developable | 0.00 |
| 10 | 1.56 | Not Developable | 0.00 |
| 11 | 0.21 | Developable | 0.21 |
| 12 | 0.64 | Developable | 0.64 |
| 13 | 1.42 | Not Developable | 0.00 |
| 14 | 0.49 | Developable | 0.49 |

Section 5: Conclusion

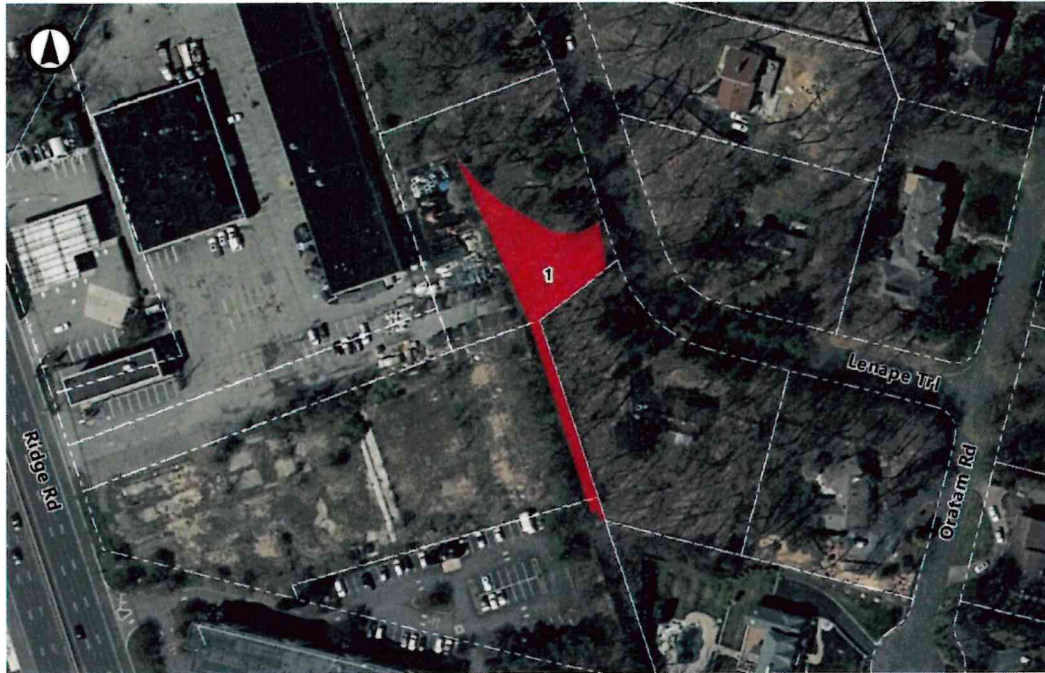
This analysis does not find fault with the methodology utilized by DCA in determining municipal affordable housing obligations. However, the analysis did uncover data that was relied upon by DCA that incorrectly included sites and acreage that should not have been calculated in the determination of the municipality's 4th Round obligation.

As detailed herein, the adjustments noted herein would serve to reduce the municipal obligation from 233 affordable units to 201 affordable units for the 4th Round.

Appendix A: Land Capacity Factor Details

ID #

1



Map 1: ID #1 (scale: 1" = 200')

| ID # | Weighted Acres | Status | Weighted Acres - Recalculated |
|------|----------------|-------------|-------------------------------|
| 1 | 0.28 | Developable | 0.28 |

Analysis

ID #1 is located on Block 1304 Lots 6.09 and 7.01. These properties are presently vacant and available for development.

ID #2



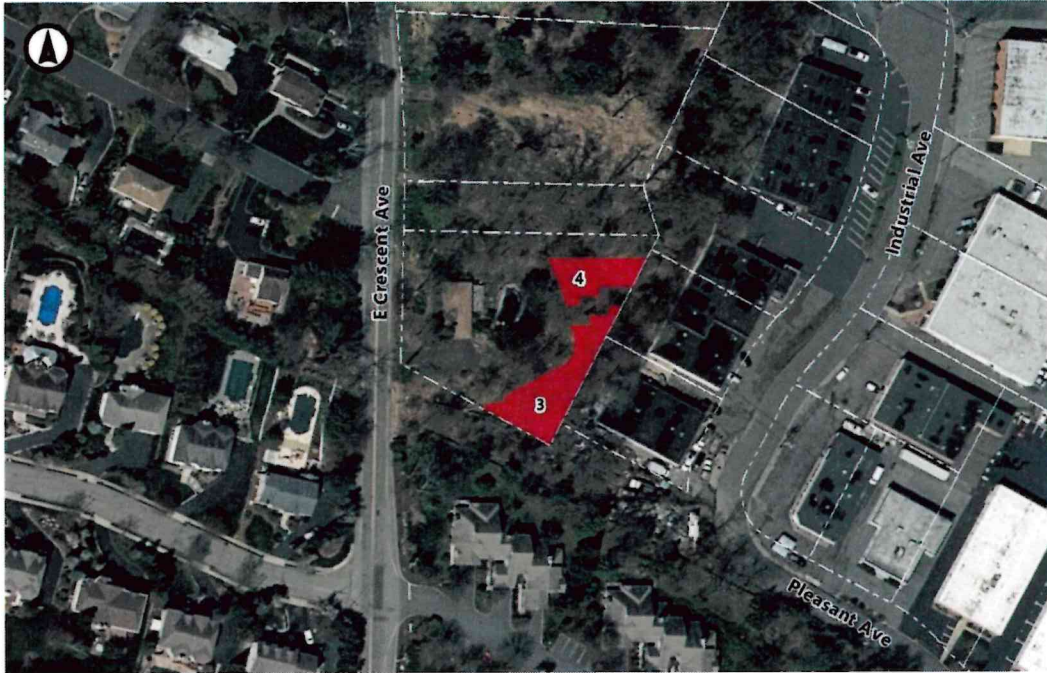
Map 2: ID #2 (scale: 1" = 300')

| ID # | Weighted Acres | Status | Weighted Acres - Recalculated |
|-------------|-----------------------|---------------|--------------------------------------|
| 2 | 3.48 | Developable | 3.48 |

Analysis

ID #2 is located on Block 1301 Lots 1.11 and 1.15. These properties are presently vacant and available for development.

ID #
3 and #4



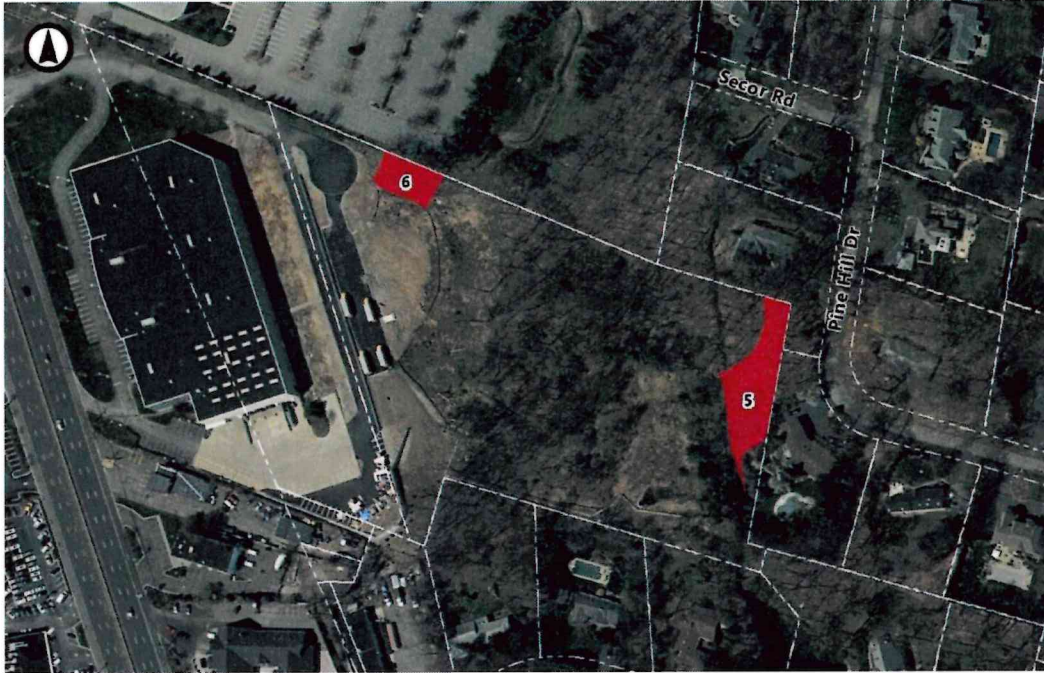
Map 3: ID #3 and #4 (scale: 1" = 200')

| ID # | Weighted Acres | Status | Weighted Acres - Recalculated |
|-------------|-----------------------|-----------------|--------------------------------------|
| 3 | 0.14 | Not Developable | 0.00 |
| 4 | 0.07 | Not Developable | 0.00 |

Analysis

ID #3 and ID #4 are located on Block 1016 Lot 6. This property is presently developed with a residential dwelling. Therefore, it is not available for development.

ID #
5 and #6



Map 4: ID #5 and #6 (scale: 1" = 300')

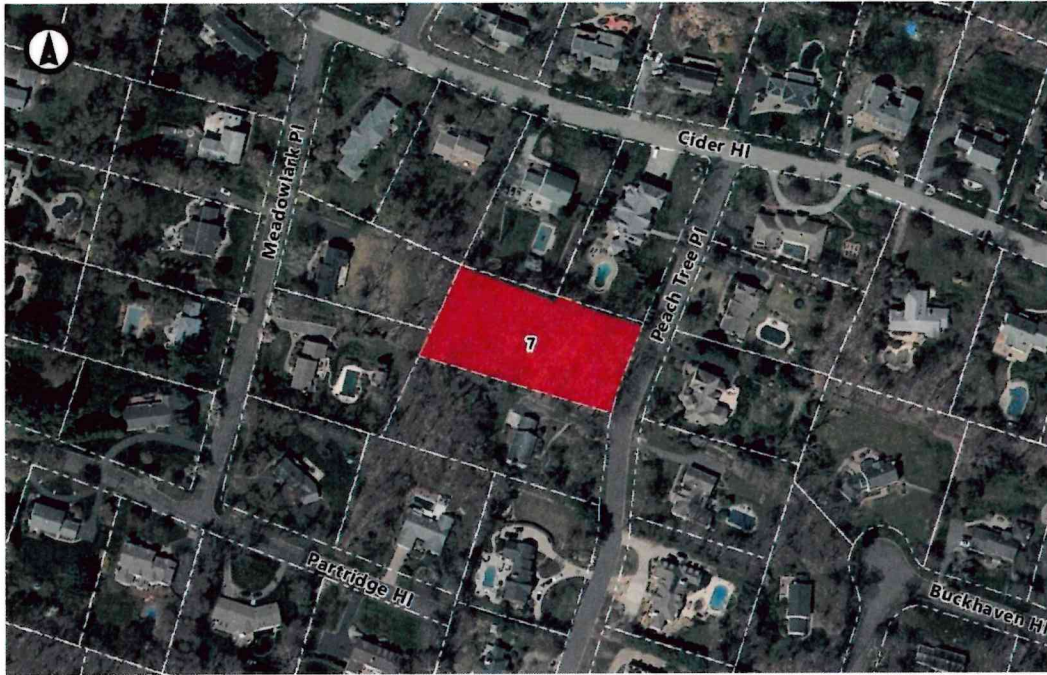
| ID # | Weighted Acres | Status | Weighted Acres - Recalculated |
|-------------|-----------------------|-----------------|--------------------------------------|
| 5 | 0.33 | Not Developable | 0.00 |
| 6 | 0.13 | Not Developable | 0.00 |

Analysis

ID #5 and ID #6 are located on Block 1002 Lot 4.02. This property is presently under construction with an affordable housing development. Thus, it is not available for development.

ID #

7



Map 5: ID #7 (scale: 1" = 300')

| ID # | Weighted Acres | Status | Weighted Acres - Recalculated |
|------|----------------|-------------|-------------------------------|
| 7 | 1.04 | Developable | 1.04 |

Analysis

ID #7 is located on Block 906 Lot 8. This property is presently vacant and available for development.