RESOLUTION # 52-2025

RESOLUTION OF THE TOWNSHIP OF EAST GREENWICH, COUNTY OF GLOUCESTER, STATE OF NEW JERSEY COMMITTING TO ROUND 4 PRESENT AND PROSPECTIVE NEED AFFORDABLE HOUSING OBLIGATIONS

WHEREAS, the Township of East Greenwich, County of Gloucester, State of New Jersey, (hereinafter, "Township" or "East Greenwich") has a demonstrated history of voluntary compliance with its constitutional affordable housing obligations; and

WHEREAS, on March 20, 2024, Governor 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 New Jersey 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 East Greenwich's Round 4 (2025-2035) fair share affordable obligations as follows: a Present Need (Rehabilitation) Obligation of 0 and a Prospective Need (New Construction) Obligation of 153; 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 P.L. 2024, c.2, or binding court decisions" (N.J.S.A 52:27D-311 (m)); and

WHEREAS, the Township has accepted the Present Need ("Rehabilitation") Obligation of 0 as reported by the DCA in its October 18, 2025 Report; and

WHEREAS, the Township has exercised its right to examine the data upon which the DCA relied to conclude that the Borough's Round 4 prospective need is 153 and concluded, for the reasons set forth below, that the correct Round 4 prospective need is 108; and

WHEREAS, more specifically, the Township has examined the data used to determine the Land Capacity Allocation Factor, that the DCA belatedly provided on or about November 27, 2024 instead of by October 20, 2024; and

WHEREAS, the Township 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 an 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)

WHEREAS, the Township maintains that the areas the DCA identified as developable are indeed overinclusive and, consequently, Richard Hunt, PP, AICP and Joseph S. Augustyn, PP, AICP, its Professional Planners, prepared a report, attached hereto as Exhibit A, showing the lands that the Township of East Greenwich contends should be removed from the inventory of sites used to fashion the Land Capacity Allocation Factor; and

WHEREAS, it is therefore important that the Township of East Greenwich not commit to an incorrect obligation; and

WHEREAS, correcting the allocation factors results in East Greenwich's Round 4 Prospective Need Obligation being 108 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, Township'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, for example, the New Jersey Institute of Local Government Attorneys ("NJILGA") has expressed its support for Legislation that has now been introduced as bill S-4065 that, if enacted, would reduce East Greenwich's Round 4 Prospective Need to 40 and would give the Township "90 days from receipt of revised fair share obligations from the [DCA] to provide an amended Housing Element and Fair Share Plan addressing the new number); and

WHEREAS, the Township of East Greenwich supports S-4065 and would have the right to reduce its Round 4 obligation in the event that the Legislature enacts the Legislation; and

WHEREAS, similarly, a number of municipalities, led by the Township of Montvale, have filed suit (MER-L-1778-24) (hereinafter "Montvale Litigation") challenging the Amended Fair Housing Act and Directive #14-24 of the Acting Administrative Director of Office of the Courts issued to implement the Amended FHA; and the ultimate outcome of that litigation has yet to be determined; 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 Amended FHA requires municipalities to adopt a binding resolution no later than January 31, 2025 as to its obligations.

WHEREAS, in light of the above, the Township of East Greenwich 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 Acting Administrative 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 a certification of compliance 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, the Township of East Greenwich seeks a certification of compliance 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 by the Township Committee of the Township of East Greenwich, County of Gloucester, 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 for the in this resolution and its attachments, the Township of East Greenwich commits to a Round 4 Present Need ("Rehabilitation") Obligation of 0 and a Round 4 Prospective Need "(New Construction") obligation of 108, 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 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 the Township of East Greenwich's response thereto.
- 3. The Township hereby directs its Affordable Housing Counsel to file a declaratory judgment complaint in the appropriate venue within 48 hours after adoption this resolution attaching this resolution.
- 4. The Township also 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.

THIS RESOLUTION DULY ADOPTED, at the Regular Meeting of the Township Committee of the Township of East Greenwich held on January 28, 2025.

TOWNSHIP OF EAST GREENWICH

ATTEST:

ELIZABETH McGILL Township Clerk



Alaimo Group

200 High Street, Mount Holly, New Jersey 08060 Tel: 609-267-8310 Fax: 609-267-7452 201 Willowbrook Blvd, Wayne, New Jersey 07470 Tel: 973-523-6200 Fax: 973-523-1765

January 28, 2025

Mayor Jim Philbin and East Greenwich Council Members East Greenwich Township Land Use Board 159 Democrat Road Mickleton, NJ 08056

Re: East Greenwich Township Council

DCA Fourth Round Prospective Need Analysis

Planner's Report

Our File: A-1090-0058-000

Dear Mayor Philbin and Council Members,

On March 20, 2024, Governor Murphy signed an Amendment to the Fair Housing Act ("Amended FHA") into law. Applying the standards in the Amended FHA, the New Jersey Department of Community Affairs (DCA) issued a report, dated October 18, 2024, setting forth nonbinding obligations for every municipality in the State. For East Greenwich, the DCA reported that the Township has a Present Need of Zero and a Round 4 Prospective Need of 153. By making its report nonbinding, municipalities have the opportunity to offer corrections.

On behalf of the Township, we took the opportunity to examine the data that the DCA used to calculate three allocation factors. We specifically reviewed the data and mapping layer the DCA used to calculate the Land Capacity Factor, and through analysis of each site and utilizing up-to-date data, we conclude that the Land Capacity Factor should be corrected. A corrected Land Capacity Factor results in a Round 4 Prospective Need of 108 Units. This report sets forth the basis for this conclusion.

The DCA Calculation

<u>Housing Region</u> – East Greenwich Township, per the FHA, is located in **Region 5.** This region includes Gloucester, Burlington, and Camden Counties.

<u>Regional Need</u> – The FHA sets forth that the regional need for the 10-year-round (2025-2035) shall be based on the household change experienced in the region between the most recent federal decennial census, and the second-most recent federal decennial census. The resulting change in households is divided by 2.5. **The DCA has determined that the regional need for Region 5 is 9,134.**

Mayor Jim Philbin and Council Members

-2-

January 28, 2025

<u>Equalized Nonresidential Valuation Factor</u> – This step requires that the changes in nonresidential property valuations in the municipality, between 1999 and 2023, shall be divided by the regional total change in nonresidential valuation. The FHA states the data input shall be that which is published by the Division of Local Government Services. The division annually publishes a summary of municipal tax data, including a Non-Residential Summary of Non-Residential Value.

The DCA has determined that East Greenwich's Equalized Nonresidential Valuation Factor: 0.37%

<u>Income Capacity Factor</u> - This step is an average of 1) the municipal share of the regional sum of the differences between the median municipal household income and an income floor of \$100 below the lowest median household income in the region and 2) 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 FHA states the data input shall be American Community Survey ("ACS") five-year estimates. The ACS publishes municipal median household incomes as part of its five-year estimates.

The DCA has determined that East Greenwich's Income Capacity Factor: 1.53%

<u>Land Capacity Factor</u> - Estimate municipal developable land using the most recent land use land cover data and weighing such land based on the planning area type in which such land is located. The FHA sets forth one of three weighting factors for a variety of planning areas across the state. Developed areas of the State, such as Planning Areas 1 and 2, Centers, etc. have a weight of 1.0. Rural and environmentally sensitive planning areas have a weight of zero; the remaining areas have a weight of 0.5.

The DCA has determined that East Greenwich's Land Capacity Factor: 3.13%

Evaluation of Land Capacity Factor

The DCA issued the data that was the basis for the land allocation factor on November 27th, over a month after the DCA deadline to issue its non-binding numbers under the Amended FHA.

The link to the DCA GIS data, and the description section (https://njdca.maps.arcgis.com/home/item.html?id=12acdfe0a5104f8f8a2f604e96063e74,) includes the following language:

"The land areas identified in this dataset are based on an 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."

Mayor Jim Philbin and Council Members

-3-

January 28, 2025

The areas identified as developable in the DCA's calculation of the Land Capacity factor is indeed overinclusive. Accordingly, we believe that the land capacity allocation factor should be adjusted from 587.315-acres to 309.65-acres. When this correction is made, East Greenwich's Round 4 prospective need number should be 108 – not 153. [if other changes to other allocation factors, more would need to be added]. The following analysis sets forth the basis for removing land treated as developable in the DCA's calculation:

Basis for Correction

Our analysis used the most up-to-date data available from the Township of East Greenwich and Gloucester County. We first created a map of the Township displaying the DCA identified "developable" areas and included this layer on a series of site constraint maps. DCA sites located in one or more of these following layers were identified as nondevelopable:

- Environmental
 - Wetlands
 - Flood Prone Areas
- DCA Area Shape and Size
- Preserved Farmland and Open Space, ROSI Sites
- Sites with Site Plan Approvals
- Current/Past Affordable Housing Sites
- Land Locked/Access
- Site Ownership
- Utilities
- Public Property
- School Property
- Houses of Worship/Cemeteries

The attached spreadsheet shows how we applied the standards set forth above to determine a correct evaluation of how much land in East Greenwich is developable.

It is important to note that the analysis to correct the land allocation factor is different than the analysis to use the determine a municipality's entitlement to vacant land adjustment. While the analysis to correct the Land Capacity factor focuses on developable land, the analysis to support a vacant land adjustment focuses on land suitable for inclusionary development. Therefore, just because a site was not removed for purposes of calculating the land capacity factor has no bearing on whether it should be removed to calculate entitlement to a vacant land adjustment.

Mayor Jim Philbin and Council Members

-4-

January 28, 2025

Impact of Correcting Land Capacity Factor

<u>East Greenwich Obligation</u> - The three factors (nonresidential value, income, and land capacity) are averaged and then applied to the regional need to determine how the need shall be allocated to each municipality.

Fourth Round Obligation		
Methodology Summary	DCA	Alaimo
Household Change (Region 5)	22835	22835
Low and Mod Home Estimate (Region 5)	9134	9134
Nonresidential Valuation Factor	0.37%	0.37%
Regional Income Capacity Factor	1.53%	1.53%
Land Capacity Factor	3.13%	1.65%
Average Factor	1.68%	1.19%
Prospective Need	153	108

Should you need additional information, please call.

Sincerely,

ALAIMO GROUP

Sincerely,

ALAIMO GROUP

Richard Hunt, PP, AICP

Senior Project Manager

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cc: Marla DeMarcantonio, Esq, East Greenwich Township Attorney Jeffrey Surenian, Esq, East Greenwich Affordable Housing Attorney Elizabeth McGill, East Greenwich Municipal Clerk

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