

## **EXHIBIT “1”**

**TOWNSHIP OF UNION**

**RESOLUTION NO. 2025 -**

**RESOLUTION OF THE TOWNSHIP OF UNION, COUNTY OF HUNTERDON AND STATE OF NEW JERSEY, ADOPTING THE TOWNSHIP'S AFFORDABLE HOUSING PRESENT AND PROSPECTIVE NEED OBLIGATION FOR THE PERIOD OF JULY 1, 2025 THRU JULY 1, 2035 IN ACCORDANCE WITH P.L. 2024 C.2, AND RESERVING ALL RIGHTS.**

**WHEREAS**, the Township of Union (hereinafter "Township") has a demonstrated history of voluntary compliance with the Mount Laurel doctrine and the New Jersey Fair Housing Act, N.J.S.A. 52:27D-301, et seq.; and

**WHEREAS**, pursuant to In re N.J.A.C. 5:96 and 5:97, 221 N.J. 1 (2015) (Mount Laurel IV), in July 2015, the Township filed a Declaratory Judgment Action in Superior Court, Law Division, Hunterdon County, under Docket No. HNT-L-305-15 ("2015 Action") seeking, among other things, a judicial declaration that the Township's Housing Element and Fair Share Plan (hereinafter "Fair Share Plan"), to be amended as necessary, satisfies its "fair share" of the regional need for low and moderate income housing pursuant to the "Mount Laurel doctrine," and

**WHEREAS**, the Township's 2015 Action ultimately culminated in a Court-approved Housing Element and Fair Share Plan and a Final Judgment of Compliance and Repose, entered on May 10, 2019, which entitles the Township to immunity and precludes Mount Laurel lawsuits and builder's remedy lawsuits from being filed against the Township until after July 1, 2025; and

**WHEREAS**, on March 20, 2024, Governor Murphy signed into law, P.L. 2024, c.2, which among other things, amended various provisions of the New Jersey Fair Housing Act, N.J.S.A. 52:27D-301 et seq. ("FHA"), abolished the Council on Affordable Housing ("COAH") and established the Affordable Housing Dispute Resolution Program ("Program"); and

**WHEREAS**, P.L. 2024, c.2, sets forth that Fourth Round period of affordable housing obligations shall run from July 1, 2025 through June 30, 2035 ("Fourth Round" or "Round Four"); and

**WHEREAS**, pursuant to P.L. 2024, c.2, the Township is located in Region 3, which is comprised of Hunterdon, Middlesex, and Somerset counties; and

**WHEREAS**, the amendments to the FHA require the Department of Community Affairs ("DCA") to prepare and publish a report on the calculations of the regional need and each municipality's present and prospective need affordable housing obligations for the Fourth Round within seven months of March 20, 2024; and

**WHEREAS**, on October 18, 2024 the DCA published its report on the calculations with respect to Statewide regional need and municipal present and prospective need affordable housing obligations for the Fourth Round (the “DCA Report”); and

**WHEREAS**, pursuant to P.L. 2024, c.2, the DCA has calculated the total statewide prospective need obligation to be 84,698 units, which equates to a statewide new construction obligation of over 8,400 affordable units per year; and

**WHEREAS**, the DCA Report calculates the Township’s non-binding Round 4 obligations as follows: 1) a Present Need or Rehabilitation obligation of “0”; and 2) a Prospective Need or New Construction Obligation of “118”; and

**WHEREAS**, the calculations in the DCA Report are not binding on municipalities; and

**WHEREAS**, rather, pursuant to N.J.S.A. 52:27D-304.1 of the FHA, each municipality is required to determine its respective Fourth Round present and prospective need fair share obligations, and adopt a binding resolution describing the basis for the municipality’s determination on or before January 31, 2025; and

**WHEREAS**, P.L. 2024, c.2, each municipality shall determine its Fourth Round present and prospective need fair share obligations, with consideration of the calculations in the DCA Report, and in accordance with the formulas established in N.J.S.A. 52:27D-304.2 and -304.3 of the FHA using “necessary datasets that are updated to the greatest extent practicable”; and

**WHEREAS**, the Township’s Planner, Municipal Attorney and Tax Assessor have reviewed the DCA Report along with the underlying data and data sets relied upon by the DCA in reaching its non-binding calculations for the Township, and have further carefully considered and analyzed the most up-to-date localized data pertaining to the Township, including amongst other verifiable information, land use approvals, environmental constraints and other site specific information, construction permits, and MOD-IV data maintained and on file with the Township with regard to the land capacity and equalized non-residential valuation allocation factors; and

**WHEREAS**, based upon same, the Township accepts the estimate set forth in the DCA Report with respect to the Township’s Present Need Obligation of 0; and

**WHEREAS**, however, the Township has determined that the DCA’s non-binding calculation of the Township’s prospective need obligation of “118” is incorrect and erroneous for multiple reasons; and

**WHEREAS**, in particular, the Township Planner has confirmed that the DCA arrived at the Township’s land capacity factor using incorrect assumptions and inaccurate data to erroneously determine that approximately 207.64 acres of land within the Township is “developable”; and

**WHEREAS**, using the most up-to-date localized data and information available to the Township, the Township Planner has determined for a variety of reasons that only 2.63 acres of land within the Township is “developable” after consideration is given to State-owned property, preserved land, and environmental constraints and restrictions (including wetlands, wetland buffers, and steep slopes), amongst other localized data and specific information; and

**WHEREAS**, the Township Planner has further independently calculated the Township’s Fourth Round Prospective Need affordable housing obligation, based on the formulas, criteria, methodology and datasets required by sections 6 and 7 of P.L. 2024, c. 2 (N.J.S.A. 52:27D-304.2 and -304.3), and has arrived at a Fourth Round Prospective Need Obligation that accurately reflects the most up-to-date pertinent factual data specific to the Township; and

**WHEREAS**, based upon the calculations of the Township Planner, the Township has determined that its Fourth Round Prospective Need or New Construction obligation is 41; and

**WHEREAS**, the Township Planner has prepared a full analysis and a summary of all relevant factors, and the basis for such conclusions, which are summarily incorporated by reference above and which attached hereto as Exhibit “A”; and

**WHEREAS**, N.J.S.A. 52:27D-304.1f(1)(b) 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 P.L. 2024, c.2 ... [;]” and

**WHEREAS**, the Township’s calculation of its Present Need and Prospective Need obligations is/are entitled to a “presumption of validity” because it complies with Sections 6 and 7 of P.L. 2024, c.2; and

**WHEREAS**, the Township, however, specifically reserves the right to adjust its Present Need and Prospective Need Obligations, including for any of the foregoing adjustments: 1) a windshield survey or similar survey which accounts for a lower resolution of present need; 2) a Vacant Land Adjustment predicated upon a lack of vacant, developable and suitable land; 3) a Durational Adjustment (whether predicated upon lack of sewer or lack of water); and/or 4) an adjustment predicated upon regional planning entity formulas, inputs or considerations, including, but not limited to the Highlands Regional Master Plan and its build out; and

**WHEREAS**, in addition to the foregoing, the Township specifically reserves all rights to revoke this resolution and commitment in the event of: (1) a successful challenge to P.L. 2024, c.2 as a result of the pending litigation entitled: Borough of Montvale et al. v. State of New Jersey, et al., Docket No.: MER-L-1778-24; (2) any other successful challenge to P.L. 2024, c.2, or any directive or regulation adopted pursuant thereto; and/or (3) any subsequent legislative or regulatory enactment which alters or changes the deadlines, calculations, methodology and/or other requirements of P.L. 2024, c.2; and

**WHEREAS**, the Township further specifically reserves the right to take a position that its Round 4 Present or Prospective Need Obligations are lower than described herein in the event that a third party challenges the calculations provided for in this Resolution (a reservation of all litigation rights and positions, without prejudice); and

**WHEREAS**, in addition to the foregoing, nothing in P.L. 2024, c. 2 requires or can require an increase in the Township's Round 4 Present or Prospective Need Obligations based on a successful downward challenge of any other municipality in the region since the plain language and clear intent of P.L. 2024, c.2, is to establish, for example, unchallenged numbers by default as of March 1, 2025; and

**WHEREAS**, in light of the above, the Township Committee of the Township of Union finds that it is in the best interest of the Township to declare its obligations in accordance P.L. 2024, c.2 in accordance with this resolution.

**NOW, THEREFORE, BE IT RESOLVED** by the Township Committee of the Township of Union, in the County of Hunterdon, and State of New Jersey as follows:

1. All of the Whereas Clauses set forth above are hereby incorporated into the operative clauses of this resolution by reference.

2. The Township Committee hereby commits to a Round 4 Present Need Obligation of 0 and the Round 4 Prospective Need Obligation of 41, as described in this resolution, and which such commitment to the Township's Round 4 Affordable Housing Obligations be and is hereby subject to the Township's reservation of all rights it may have, as described in this resolution or otherwise, to revoke, repeal, suspend, amend or modify this resolution by further action of the Township, including but not limited to, the following:

- a) The right to adjust, modify, cancel, withdraw or revoke the Township's commitment to its Round 4 Present Need and Prospective Need Obligations, and/or to otherwise revoke, repeal, suspend, amend, or modify this Resolution should additional information or evidence become available or discoverable to the Township in the future;
- b) The right to adjust the Present Need Obligation based on the results of a windshield survey;
- c) The right to adjust the Prospective Need Obligation based on lack of available vacant and developable land, sewer, water, and/or due to regional planning inputs formulas or considerations, including, but not limited to the Highlands Regional Master Plan and its build out, or any combination of the above;
- d) All rights to revoke this resolution in the event of a successful legal challenge to P.L. 2024, c.2, a legislative change to P.L. 2024, c. 2, or any successful challenge to any directive or regulation adopted pursuant



to P.L. 2024, c.2, or any change or amendment to such directives or regulations;

- e) All rights to take a position that Township's Round 4 Present or Prospective Need Obligations are lower than described herein in the event a third party challenges the calculations provided for in this Resolution; and/or
- f) All rights to take a position that the Township's Round 4 Present and Prospective Need Obligations is lower than described herein in the event a third-party claims the Township's Round 4 Present or Prospective Need Obligations require an increase based on a reallocation or modification of the Regional Present or Prospective Need Obligations allegedly due from successful reduction of the allocated present and prospective need obligations assigned to another municipality in the Region.

3. The Township's calculation of Present and Prospective Need Obligations is/are entitled to a "presumption of validity" because it complies with Sections 6 and 7 of P.L. 2024, c.2.

4. In accordance with N.J.S.A. 52:27D-304.1, the Township hereby directs the Township Attorney to file an action with the Affordable Housing Dispute Resolution Program along with this resolution and to take all necessary and proper steps to address any challenges to same by any interested parties.

5. The Township further commits to adopt its housing element and fair share plan pursuant to N.J.S.A. 52:27D-304.1f(2) based on this determination on or before June 30, 2025, and hereby further directs the Township Attorney, Township Affordable Housing Planner and Township Engineer to begin taking steps to prepare same.

6. A copy of this resolution, along with filing date of Township's action with the Program, shall be placed on the Township's website.

7. A copy of this resolution shall remain on file in the Township Clerk's office and available for public inspection.

8. This resolution shall take effect immediately, according to law.

Adopted: January 22, 2025

Ella M. Ruta

Ella Ruta, Township Clerk



David DeGiralamo, Mayor

## **EXHIBIT "A"**



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**Union Township, Hunterdon County, declares the following Fourth Round Affordable Housing Obligation:**

- 1. Present Need: 0**
- 2. Fourth Round / Prospective Need Obligation: 41**

As stated in the Amended Fair Housing Act (P.L. 2024, CHAPTER 2,) (hereinafter the “FHA”), municipalities must adopt a binding resolution declaring their fourth round affordable housing obligation prior to January 31, 2025 to maintain immunity from exclusionary zoning litigation and obtain a compliance certification through the Affordable Housing Dispute Resolution Program. This resolution shall describe the basis for the municipality’s determination of the obligation and bind the municipality to subsequently submitting a housing element and fair share plan. Union Township adopted said resolution, which references this Report, at their January 22, 2025 Governing Body meeting.

As stated in the FHA, the municipality shall determine its present and prospective fair share obligation for affordable housing in accordance with the formulas established therein. As also stated in the FHA, the municipality’s determination of the obligation shall have a presumption of validity, if established in accordance with the FHA. Union Township’s declaration of its affordable housing obligation is consistent with the methodology set forth in the FHA.

**Present Need**

Union Township supports and accepts the methodology and calculation of the present need as set forth by the Department of Community Affairs in *Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background*, released on or about October 18, 2024. As such, the Township declares its fourth round present need obligation to be 0.

**Fourth Round Prospective Need**

With one exception, Union Township supports and accepts the methodology and calculation of the prospective need as set forth by the Department of Community Affairs in *Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background*, released on or about October 18, 2024 (hereinafter the “DCA Report”). The exception addresses the land capacity factor (hereinafter “LCF”); all other figures and calculations (regional need, income capacity factor, nonresidential valuation factor) used by Union Township to calculate the prospective need are consistent with the DCA Report.





The LCF identifies developable land in each municipality and is used to allocate the regional affordable housing obligation to those municipalities with available land to accommodate the obligation (as one of three factors responsible for the allocation). The FHA states the LCF 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.* It goes on to state that developable land that may accommodate development shall be weighted based on the planning area in which such land is located.

The process for Fourth Round affordable housing compliance and the criteria, methodology and formulas each municipality must rely upon to determine its present and prospective need obligation are now set forth within N.J.S.A. 52:27D-304.1 thru -304.3 of the FHA. The March 8, 2018 unpublished decision of the Superior Court, Law Division, Mercer County, In re Application of Municipality of Princeton ("Jacobson Decision") is also to be referenced as to datasets and methodologies that are not explicitly addressed in N.J.S.A. 52:27D-304.3. Furthermore, both the Jacobson Decision and N.J.S.A. 52:27D-304.3a of the FHA explain that the datasets and information must be reliable and updated to the greatest extent practicable. For example, N.J.S.A. 52:27D:304.3a explicitly states: "[t]hese calculations of municipal present and prospective need shall use necessary datasets that are updated to the greatest extent practicable."

Consistent with sections 6 and 7 of P.L. 2024, c. 2 (N.J.S.A. 52:27D-304.2 and N.J.S.A. 52:27D-304.3), we have considered the DCA Report, along with the underlying data and data sets relied upon by the DCA in reaching its non-binding calculations for the Township, and have further carefully considered and analyzed the most up-to-date localized data pertaining to the Township, including amongst other verifiable information, land use approvals, environmental constraints (including wetlands, wetland buffers, and steep slopes) and other site specific information, construction permits, and MOD-IV data maintained and on file with the Township, and conservation easements and other deed restrictions. Based upon our analysis of the DCA Report, the data and data sets relied upon by the DCA and our analysis of the Township's up-to-date localized verifiable data, we have determined that the DCA arrived at the Township's land capacity factor using incorrect assumptions and outdated data and/or or incorrect or inaccurate data.

The areas identified as developable in the DCA's calculation of the Land Capacity factor is indeed overinclusive. Accordingly, the land capacity allocation factor should be adjusted from 207.64 acres to 1.95 acres. When this correction is made, Union Township's round 4 prospective need number should be 41, not 118. For further details on the below two categories of corrections, see the table and mapping in attached to this Report.

1. Preserved Property – 127.24 acres of developable lands identified by DCA are restricted from further development via a resolution of subdivision approval or a conservation easement and thus may not be developed for any purpose. The relevant documents are available upon request. The lack of development rights for these properties should be recognized in the same manner as the DCA did for other preserved properties, such as those subject to the Farmland Preservation



Program or Green Acres Program, for these properties area also unable to accommodate additional development. As such, the LCF should be corrected to eliminate these properties.

2. State Owned Property – 78.45 acres of developable lands identified by DCA are part of the Edna Mahon Correctional Facility. This facility is in operation, housing inmates and operating its programs, buildings, and grounds. These properties are not subject to Township zoning and may not be developed, and as such should be eliminated from the LCF. However, their inclusion in the LCF may be appropriate if in the future they are vacated, and sale of the property occurs or is expected.

Exclusion of this site is similar to the DCA exclusion of other government owned properties, such as local schools (see Union Township Middle School at 165 Perryville Road), County properties (see the Hunterdon County Administration Complex at 314 Route 12, Raritan Township) state owned open space (see Spruce Run and Round Valley Reservoirs at 68 Van Syckles Road in Clinton Township and 1220 Stanton Lebanon Road in Clinton Township). These properties' lack of developability due to ongoing government use should be recognized in the same manner as the DCA did for the other government owned properties described prior, for there is no distinction in their inability to be developed or redeveloped.

The State has not indicated that this property will be sold in the coming years or otherwise redeveloped. In fact, the state land disposition process is a multi-year process that has not started for this site and for which there is no evidence to suggest the disposition of this property would occur during the fourth round. N.J.S.A. 52:31-1.6 governs disposition of property owned by the State Department of Corrections (hereinafter "DOC:"). Under the Statute, the head of DOC with approval of the Governor and State House Commission, are authorized to dispose of the State's interest in the property if deemed appropriate by the DOC head. The DOC must provide 30-day's notice of sale/transfer of property identified or contemplated by the master plan to various committees, including the General Assembly State Government Committee, the Senate State Government Committee, the General Assembly Appropriations Committee, and the Senate Revenue, Finance and Appropriations Committee. To reiterate, there is no indication the property will be disposed of, but if it were, this multi-year process has not started.

Consider for a similar example – the Camden Riverfront State Prison – this property remains in State ownership 16 years after closure. Four (4) years after the prison's closure in 2009, a law enacted in 2013, P.L.2013, c.22, authorized the sale and conveyance of that property by the Department of the Treasury to the New Jersey Economic Development Authority (hereinafter the "EDA") so that the EDA could sell the property. Note that the decision to transfer the property to another government agency, not a private developer that might seek to redevelop the site, took four years. Eleven years later, the property remains in State ownership, unsold by the EDA.

Given the ongoing occupancy and operation of the Edna Mahon Correctional Facility, and the multi-year process to dispose of the property – the LCF should be corrected to eliminate these properties.



The above listed corrections are necessary to properly account for property for which there are no development rights (preserved or otherwise restricted) and property that, similar to preserved property, are unable to be developed privately or by the municipality (Edna Mahon Correctional Facility). These corrections are appropriate to best allocate the regional obligation proportionately to those municipalities that have the land capacity to fulfill the obligation – doing so will reduce the extent of vacant land and durational adjustment obligations, resulting in the increased creation of affordable housing in the region.

The Township’s corrections are consistent with the FHA and the approach in the DCA Report. The State Agency interpreted the FHA as was thought necessary to calculate an accurate LCF for each municipality. Union Township’s LCF calculation continues this principle by correcting the Agency’s identification of “developable” property. The Program should recognize that the DCA took steps beyond those specified in the FHA it deemed necessary to calculate the LCF. There are multiple examples of the DCA deviating from the strict and minimum language in the FHA as necessary to calculate a reasonably accurate LCF. In each of the following examples, these environmental features are not addressed in the NJDEP Land Use Land Cover data, FHA, or the “Jacobson Decision” but yet they are excluded from the DCA’s calculation of the LCF.

- Steep slopes exceeding 15%;
- Category 1 waterway buffers; and
- Wetland buffers.

These categories of land were excluded to recognize their lack of developability. The additional preserved and correctional facility properties should be excluded from the LCF for the same reasons.

Additionally, the Township’s corrections are consistent with the following guiding documents:

- FHA and the “Jacobson Decision”: The Act states the calculation of municipal obligation shall be consistent with the therein, as well as the *March 8, 2018 unpublished decision of the Superior Court, Law Division, Mercer County, In re Application of Municipality of Princeton shall be referenced as to datasets and methodologies that are not explicitly addressed by this section*. The Township’s corrections to DCA’s calculation of the LCF are consistent with this decision.
  - The Jacobson decision, in regard to the LCF, addresses the proper data source to identify “undeveloped land in the community that can accommodate development” and finds that use of the NJDEP Land Use Land Cover is best. The decision does not address the other factors in the calculation, despite that they are reflected in the approach endorsed by the Court, such as but not limited to exclusion of preserved property.
- FHA: The law states, in N.J.S.A. 52:27D-304.3a, “calculations of municipal present and prospective need shall use necessary datasets that are updated to the greatest extent practicable.” The Jacobson decision explained this point further: “Any reasonable methodology must have as its keystone three ingredients: reliable data, as few assumptions as possible, and an internal system of checks and balances. Reliable data refers to the best source available for the information needed and the rejection of data which is suspect. The need to make as few assumptions as possible refers to the desirability of avoiding subjectivity and avoiding any data which requires excessive mathematical extrapolation. An internal system of checks and balances refers to the



effort to include all important concepts while not allowing any concept to have a disproportionate impact.”

- The Township’s corrections regarding State-owned property are based on reliable and updated data that is reflected in the MOD IV databased, as well as inventories of State-owned properties.
- The Township’s corrections regarding preserved properties are a correction to DCA’s attempt to exclude preserved properties. The Township serves as a check for this step in the DCA process to ensure an accurate calculation of developable land.
- FHA: The findings in N.J.S.A. 52:27D-302.2.s., states *[t]he Legislature, in amending and supplementing the "Fair Housing Act," P.L.1985, c.222 (C.52:27D-301 et al.), intends to facilitate comprehensive planning in alignment with smart growth principles, and the State Development and Redevelopment Plan.* (emphasis added)
  - An accurate LCF, one that reflects lands that are eligible for residential development, promotes comprehensive planning by allocating the regional obligation proportionately to those municipalities that have the land capacity to fulfill the obligation.
  - The Township’s corrections are consistent with the adopted State Development and Redevelopment Plan, including but not limited to, Open Space and Recreational Lands Policy 9 – Retention of Recreational and Open Space Land in Private Ownership (*Promote and encourage the protection and enhancement of privately owned tracts of open space...*)
- Mt. Laurel II Decision<sup>1</sup>: This 1983 Supreme Court decision states municipal obligations should reflect conservation and environmental conditions,
 

*We reassure all concerned that Mount Laurel is not designed to sweep away all land use restrictions or leave our open spaces and natural resources prey to speculators. Municipalities consisting largely of conservation, agricultural, or environmentally sensitive areas will not be required to grow because of Mount Laurel. No forests or small towns need be paved over and covered with high-rise apartments as a result of today's decision.*
- AMG Decision<sup>2</sup>: This 1984 Superior Court decision sets forth the original basis for determining municipal affordable housing obligations. While subsequent efforts by COAH and the FHA provide alterations to the methodology, the basic framework remains – including the three allocation factors. The AMG decision refers to the “growth area” factor for what is now referred to at the LCF. This decision recognizes the need for an accurate accounting of developable land for the regional allocation.
 

*Any reasonable methodology must account for a municipality's physical capacity to provide space for new construction. The growth area factor is designed to*

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<sup>1</sup> Southern Burlington County NAACP v. Township of Mt. Laurel (II), 92 N.J. 158, 456 A.2d 390 (1983)

<sup>2</sup>



*reflect that capacity. It identifies that area within the municipality which has been earmarked by the SDGP as an appropriate place for development.*

...

*It should be recognized that a municipality's capacity to accept lower income housing would be better measured by a factor which identifies the amount of vacant developable land within the growth area. Not all growth area land is vacant or suitable for development. Some towns designated as growth are fully developed. Other vacant land is either physically constrained due to slopes, watercourses or other conditions or is inappropriate for Mount Laurel high density development because of other planning or environmental concerns.*

(Emphasis added)

**Opinions and Conclusions**

As part of our analysis, this office has prepared a “Land Capacity Factor Correction” chart which details the parcels/land included in the DCA Report that must be corrected, as well as more detailed mappings of same. The “Land Capacity Correction” chart and mappings are incorporated at the end of this report.

The methodology used to identify and exclude parcel types listed in the analysis contained within this report is consistent with the published DCA Report. The data, data sources, methodology, criteria and formulas relied upon in completing this analysis and arriving at these opinions, including the calculation of the Township’s Prospective Need Obligation, was performed in accordance with sections 6 and 7 of P.L. 2024, c. 2 (N.J.S.A. 52:27D-304.2 and N.J.S.A. 52:27D-304.3) and the Jacobson Decision. All opinions and conclusions set forth herein are within a reasonable degree of professional planning certainty. We reserve the right to amend and supplement our findings, opinions and conclusions should additional information be made available at a later date.

The below table provides the summary calculation of fourth round obligation for the Township of Union, Hunterdon County.

**Union Township Fourth Round Obligation Methodology Summary**

<b>Factor</b>	<b>DCA</b>	<b>Corrected</b>
Region 3 Household Change 2010-2020	29,009	29,009
Region 3 Low & Mod Home Estimate	11,604	11,604
Union Nonresidential Valuation Factor	0.14%	0.14%
Union Regional Income Capacity Factor	0.89%	0.89%
<i>Union Land Capacity Factor</i>	2.01%	0.02%
<i>Average Factor</i>	1.01%	0.35%
<b><i>Union’s Fourth Round Obligation</i></b>	<b>118</b>	<b>41</b>

Union Township, Hunterdon County: Land Capacity Factor Correction										
LCF ID	Block	Lot	Property Location	Owner Address	Property Use	DCA Identified Acreage	Township Identified Acreage			
1	29.02	1	2 STIRES WAY	2 STIRES WAY	Wooded portion of farmland; Subject to Conservation Easement	0.06	0.00			
2	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.08	0.00			
3	22	12	FRONTAGE ROAD	PO BOX 120	Wooded Area	0.09	0.09			
4	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.16	0.00			
5	29	2	STIRES WAY	140 SYLVAN AVE STE 300	Vacant	0.28	0.28			
6	22	30	5 FRONTAGE ROAD	3498 ROUTE 22	Stone Supplier/Quarry; Wooded Area	0.12	0.12			
7	22	30	5 FRONTAGE ROAD	3498 ROUTE 22	Stone Supplier/Quarry; Wooded Area	0.14	0.14			
8	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.09	0.00			
9	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.21	0.00			
10	13	6			Wooded Area	0.15	0.15			
11	30	12	32 GROVE FARM RD	32 GROVE FARM ROAD	Wooded Area; Subject to Conservation Easement	0.26	0.00			

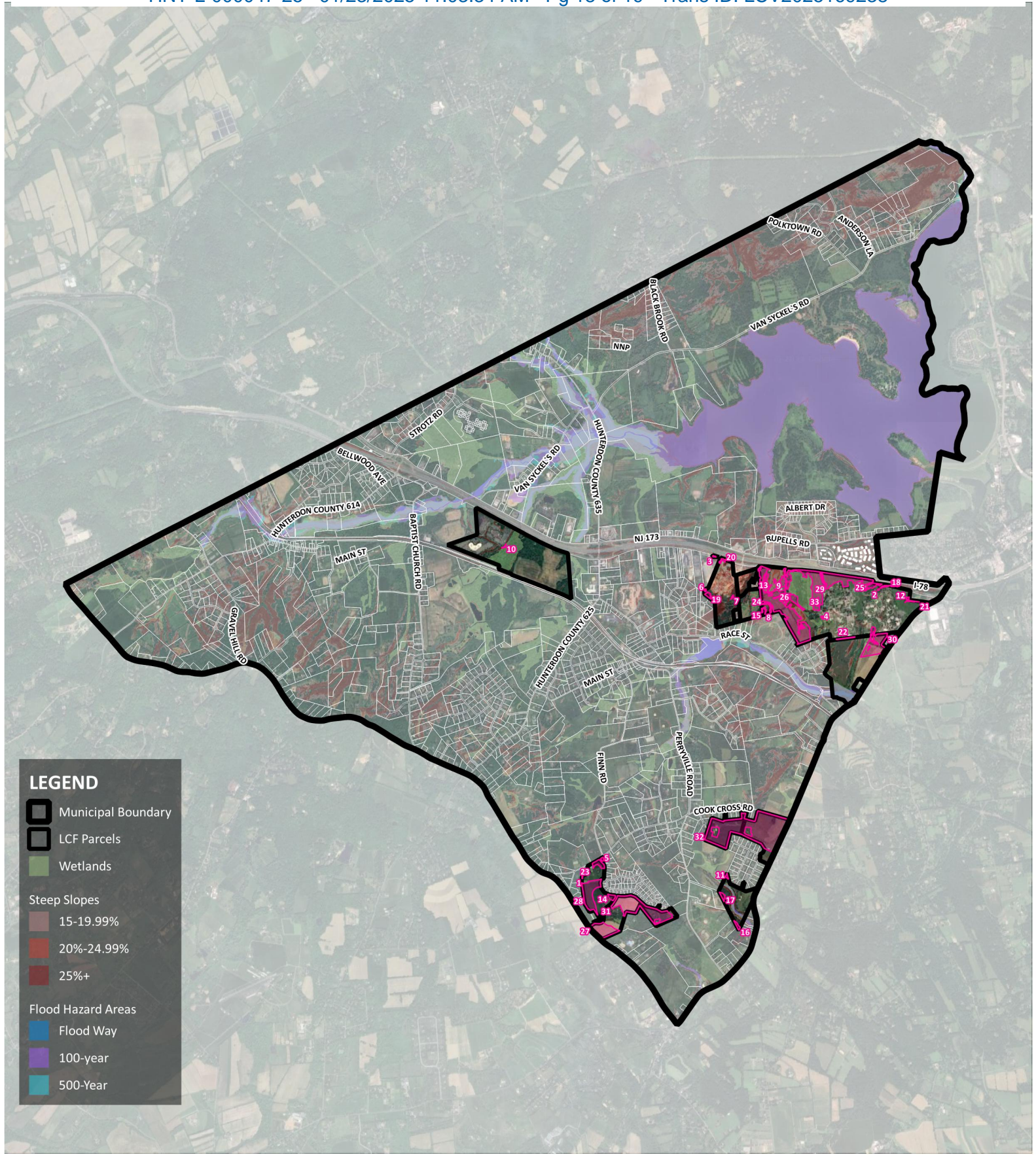


Union Township, Hunterdon County: Land Capacity Factor Correction									
LCF ID	Block	Lot	Property Location	Owner Address	Property Use	DCA Identified Acreage	Township Identified Acreage		
12	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.21	0.00		
13	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.16	0.00		
14	29.02	1	2 STIRES WAY	2 STIRES WAY	Farmland; Subject to Conservation Easement	1.08	0.00		
15	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.28	0.00		
15	22	28	FRONTAGE ROAD	3498 ROUTE 22	Edna Mahon Correctional Facility	-	0.00		
16	30	12	32 GROVE FARM RD	32 GROVE FARM ROAD	Wooded Area; Subject to Conservation Easement	0.64	0.00		
17	30	12	32 GROVE FARM RD	32 GROVE FARM ROAD	Wooded Area; Subject to Conservation Easement	0.79	0.00		
18	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.34	0.00		
19	22	30	5 FRONTAGE ROAD	3498 ROUTE 22	Stone Supplier/Quarry; Wooded Area	0.75	0.75		
20	22	30	5 FRONTAGE ROAD	3498 ROUTE 22	Stone Supplier/Quarry	0.42	0.42		
21	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.27	0.00		

Union Township, Hunterdon County: Land Capacity Factor Correction									
LCF ID	Block	Lot	Property Location	Owner Address	Property Use	DCA Identified Acreage	Township Identified Acreage		
22	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.30	0.00		
22	22	20	ROUTE 513	PO BOX5 196	Edna Mahon Correctional Facility; Subject to Conservation Easement	-	0.00		
23	29.02	1	2 STIRES WAY	2 STIRES WAY	Portion of Farm/residence; Subject to Conservation Easement	2.05	0.00		
24	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	0.68	0.00		
25	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	1.63	0.00		
26	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	2.34	0.00		
27	29.03	18	6 GROOM ROAD	6 GROOM RD	Farmland; Subject to Conservation Easement	9.15	0.00		
28	29.02	1	2 STIRES WAY	2 STIRES WAY	Farmland; Subject to Conservation Easement	12.32	0.00		
29	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	13.61	0.00		
30	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	13.27	0.00		
30	22	20	ROUTE 513	PO BOX 5196	Farmland; Subject to Conservation Easement	-	0.00		

Union Township, Hunterdon County: Land Capacity Factor Correction							
LCF ID	Block	Lot	Property Location	Owner Address	Property Use	DCA Identified Acreage	Township Identified Acreage
31	29.03	18	6 GROOM ROAD	6 GROOM RD	Farmland; Subject to Conservation Easement	23.78	0.00
31	29.03	17	STEVENS LANE	PO BOX 5627	Farmland; Subject to Conservation Easement	-	-
32	30	1	20 RED JACKET LANE	20 RED JACKET LANE	Preserved farmland	63.84	0.00
32	30	11			Preserved farmland	-	0.00
33	22	18	30 ROUTE 513	WHITTLESEY RD	Edna Mahon Correctional Facility	58.09	0.00
33	22	15.01	3 FRONTAGE ROAD	78 ROUTE 173 WEST #1	Edna Mahon Correctional Facility	-	0.00
33	22	28	FRONTAGE ROAD	3498 ROUTE 22	Edna Mahon Correctional Facility	-	0.00
33	22	18.02	FRONTAGE ROAD	3498 ROUTE 22	Edna Mahon Correctional Facility	-	0.00
<b>Total Area</b>						<b>207.64</b>	<b>1.95</b>





**LEGEND**

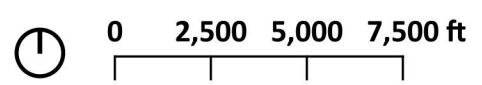
- Municipal Boundary
- LCF Parcels
- Wetlands
- Steep Slopes
  - 15-19.99%
  - 20%-24.99%
  - 25%+
- Flood Hazard Areas
  - Flood Way
  - 100-year
  - 500-Year



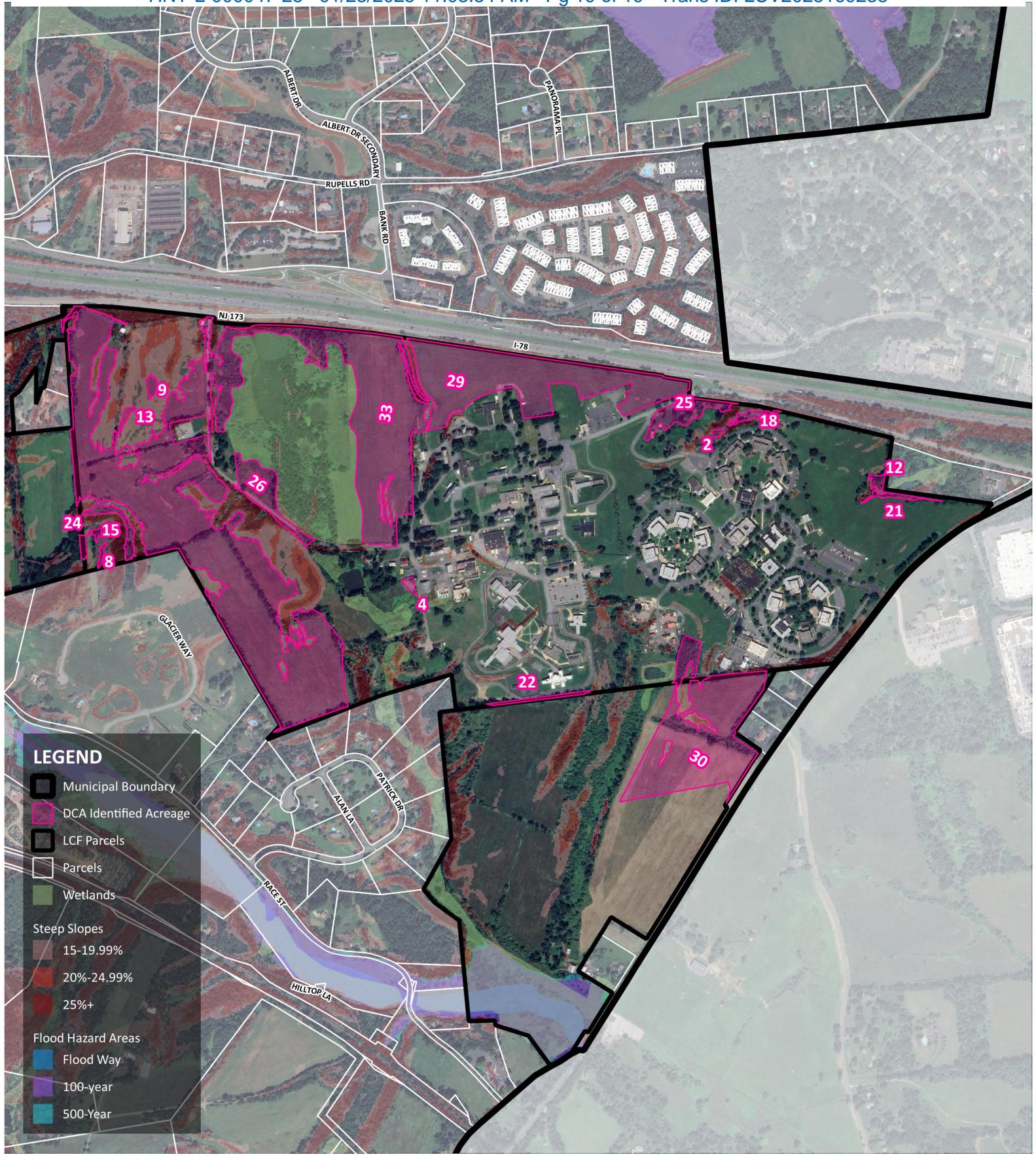
# LAND CAPACITY FACTOR ANALYSIS

**4TH ROUND AFFORDABLE HOUSING**  
 TOWNSHIP OF UNION | HUNTERDON COUNTY

DATA SOURCES: Google Earth 2023; NJGIN Parcels 2023







**LEGEND**

- Municipal Boundary
- DCA Identified Acreage
- LCF Parcels
- Parcels
- Wetlands
- Steep Slopes
  - 15-19.99%
  - 20%-24.99%
  - 25%+
- Flood Hazard Areas
  - Flood Way
  - 100-year
  - 500-Year



# LAND CAPACITY FACTOR ANALYSIS - EDNA MAHON

**4TH ROUND AFFORDABLE HOUSING**  
 TOWNSHIP OF UNION | HUNTERDON COUNTY

DATA SOURCES: Google Earth 2023; NJGIN Parcels 2023

