

EXHIBIT 9
MARKET TO AFFORDABLE HOUSING

Proposed and Completed Affordable Units

Market to Affordable

County	Municipality	Project / Program	Status	
ATLANTIC	BRIGHTLINE CITY	Market to Affordable Program	Proposed/Zoned	2
ATLANTIC	GALLOWAY TWP	Market to Affordable Program	Proposed/Zoned	
ATLANTIC	MULLICA TWP	Market to Affordable program	Proposed/Zoned	
BERGEN	CARLSTADT BORO	Market to Affordable Prog	Proposed/Zoned	
BERGEN	DEWAREST BORO	Market-To-Affordable Program	Proposed/Zoned	
BERGEN	DUMONT BORO	Market to Affordable Program	Proposed/Zoned	
BERGEN	EDGEWATER BORO	Affordable Housing of Metropolitan Edgewater	Completed	18
BERGEN	EDGEWATER BORO	Market to Affordable Program	Proposed/Zoned	
BERGEN	FAIRVIEW BORO	Market to Affordable Prog	Proposed/Zoned	
BERGEN	NORTH ARLINGTON BORO	Buy-Down Program	Proposed/Zoned	
BERGEN	NORTH ARLINGTON BORO	Municipal Rental Subsidy Program	Proposed/Zoned	
BERGEN	NORTHVALE BORO	Market to Affordable Program	Proposed/Zoned	
BERGEN	ROCHELLE PARK TWP	Market to Affordable Program	Proposed/Zoned	
BERGEN	RUTHERFORD BORO	Market to Affordable	Proposed/Zoned	
BERGEN	TENAFLY BORO	Market to Affordable Program	Proposed/Zoned	
BERGEN	WALDWICK BORO	101 Wyckoff Ave	Completed	4
BURLINGTON	BURLINGTON CITY	Neighborhood Stabilization	Under Construction	8
BURLINGTON	CHESTERFIELD TWP	Crosswicks Inn	Completed	1
BURLINGTON	DELANCO TWP	404 Illinois Avenue	Completed	1
BURLINGTON	DELAN TWP	Delran Market to Affordable Program	Proposed/Zoned	
BURLINGTON	EDGEWATER PARK TWP	Edgewater Park Market to Affordable Prog	Proposed/Zoned	
BURLINGTON	EVESHAM TWP	Market to Affordable Program	Proposed/Zoned	
BURLINGTON	FLORENCE TWP	Market to Affordable	Proposed/Zoned	6
BURLINGTON	HAINESPORT TWP	Buy Down Program	Completed	3
BURLINGTON	HAINESPORT TWP	Market to Affordable	Proposed/Zoned	
BURLINGTON	MEDFORD TWP	Market to Affordable Program	Proposed/Zoned	
BURLINGTON	MOORESTOWN TWP	Beech Street	Proposed/Zoned	18
BURLINGTON	MOORESTOWN TWP	Clover Apartments	Proposed/Zoned	5
BURLINGTON	MOORESTOWN TWP	Musser Court	Proposed/Zoned	14
BURLINGTON	MOUNT LAUREL TWP	Buy Down Program - for sale and rental	Proposed/Zoned	
BURLINGTON	NEW HANOVER TWP	Market to Affordable	Proposed/Zoned	
BURLINGTON	SOUTHAMPTON TWP	Write-Down/Buy-Down Program	Proposed/Zoned	
BURLINGTON	SPRINGFIELD TWP	Buy Down Program	Completed	1
BURLINGTON	SPRINGFIELD TWP	Round 3 Market to Affordable	Proposed/Zoned	
CAMDEN	BELLMAR BORO	Market to Affordable	Proposed/Zoned	
CAMDEN	HADDON HEIGHTS BORO	Market to Affordable Program	Proposed/Zoned	
CAMDEN	VOORHEES TWP	Market to Affordable Program	Proposed/Zoned	

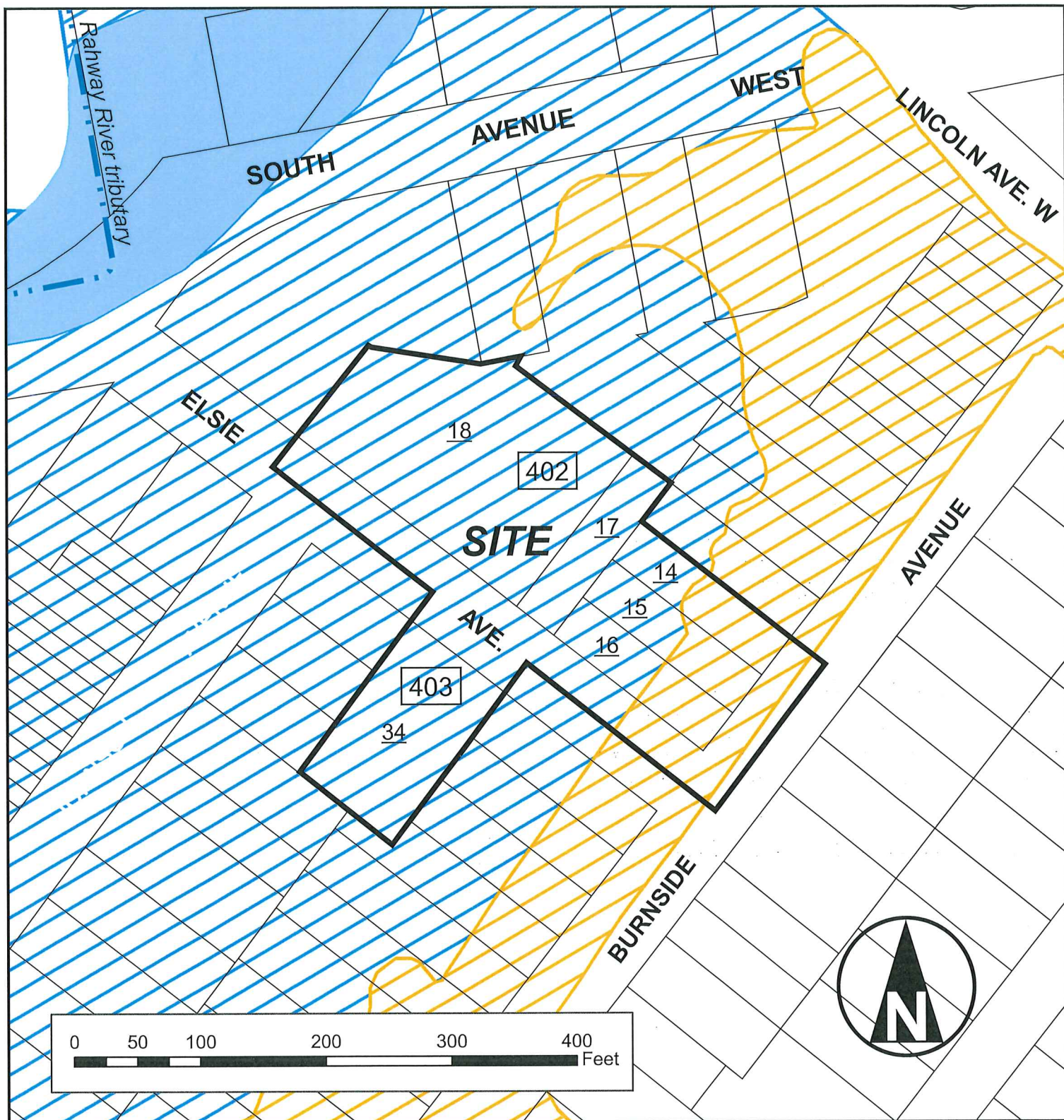
County	Municipality	Project / Program	Status	
CAPE MAY	CAPE MAY CITY	Market to Affordable Program	Market to Affordable	Proposed/Zoned
CAPE MAY	LOWER TWP	Market to Affordable	Market to Affordable	Proposed/Zoned
CAPE MAY	MIDDLE TWP	Balanced Housing Buy-down Program	Market to Affordable	Completed
CAPE MAY	MIDDLE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
CAPE MAY	UPPER TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
CAPE MAY	WILWOOD CREST BORO	Market to Affordable	Market to Affordable	Proposed/Zoned
CUMBERLAND	VINELAND CITY	Market to Affordable program	Market to Affordable	Proposed/Zoned
ESSEX	CEDAR GROVE TWP	Market to Affordable	Market to Affordable	Proposed/Zoned
ESSEX	SOUTH ORANGE VILLAGE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
ESSEX	WEST ORANGE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
GLOUCESTER	ELK TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
GLOUCESTER	GREENWICH TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
GLOUCESTER	MONROE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
GLOUCESTER	NEWFIELD BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned
GLOUCESTER	SOUTH HARRISON TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUDSON	HARRISON TOWN	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	ALEXANDRIA TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	BETHLEHEM TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	CLINTON TOWN	Rental Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	EAST AMWELL TWP	Buy-Down Program	Market to Affordable	Under Construction
HUNTERDON	FLEMINGTON BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	HIGH BRIDGE BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned
HUNTERDON	LEBANON TWP	Hunterdon Hills	Market to Affordable	Proposed/Zoned
HUNTERDON	READINGTON TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
MERCER	EAST WINDSOR TWP	East Windsor Rental Program	Market to Affordable	Proposed/Zoned
MERCER	PRINCETON	291-293 Nassau Street	Market to Affordable	Completed
MERCER	PRINCETON	5 Shirley Court	Market to Affordable	Completed
MERCER	PRINCETON	6 Shirley Court	Market to Affordable	Completed
MERCER	PRINCETON BORO	291-293 Nassau Street	Market to Affordable	Completed
MERCER	PRINCETON BORO	5 Shirley Court	Market to Affordable	Completed
MERCER	PRINCETON BORO	6 Shirley Court	Market to Affordable	Completed
MIDDLESEX	EAST BRUNSWICK TWP	Buy-Down Program - R2	Market to Affordable	Completed
MIDDLESEX	EAST BRUNSWICK TWP	Market to Affordable Program	Market to Affordable	Under Construction
MIDDLESEX	EDISON TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
MIDDLESEX	HIGHLAND PARK BORO	Write-Down Buy-Down Program	Market to Affordable	Completed
MIDDLESEX	METUCHEN BORO	Metuchen Senior Citizens Housing	Market to Affordable	Proposed/Zoned
MIDDLESEX	NORTH BRUNSWICK TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned
MIDDLESEX	PLAINSBORO TWP	Market to Affordable	Market to Affordable	Proposed/Zoned
MIDDLESEX	SOUTH AMBOY CITY	Municipal Rental Housing Program	Market to Affordable	Under Construction
MIDDLESEX	SOUTH BRUNSWICK TWP	REACH Program	Market to Affordable	Proposed/Zoned
MONMOUTH	ATLANTIC HIGHLANDS BORO	Navasink Cove	Market to Affordable	Proposed/Zoned

County	Municipality	Project / Program		Status	
MONMOUTH	BELMAR BORO	Municipal Buy-down Program	Market to Affordable	Proposed/Zoned	
MONMOUTH	BELMAR BORO	Rental Buy-down Program	Market to Affordable	Proposed/Zoned	
MONMOUTH	HOWELL TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
MONMOUTH	LONG BRANCH CITY	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
MONMOUTH	MIDLETOWN TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
MONMOUTH	MONMOUTH BEACH BORO	Market to Affordable Program	Market to Affordable	Under Construction	
MONMOUTH	RUMSON BORO	19 North Street	Market to Affordable	Proposed/Zoned	
MONMOUTH	RUMSON BORO	68 Black Point Road	Market to Affordable	Proposed/Zoned	
MORRIS	CHATHAM TWP	Market to Affordable program	Market to Affordable	Proposed/Zoned	
MORRIS	CHESTER BORO	Buy-Down Program	Market to Affordable	Unknown	
MORRIS	FLORHAM PARK BORO	Market to Affordable program	Market to Affordable	Proposed/Zoned	
MORRIS	LINCOLN PARK BORO	Market to Affordable	Market to Affordable	Proposed/Zoned	
MORRIS	MADISON BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
MORRIS	MORRISTOWN TOWN	Franklin Village	Market to Affordable	Unknown	1
MORRIS	MORRIS TWP	Woodridge Estates	Market to Affordable	Completed	
MORRIS	MOUNT OLIVE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
MORRIS	ROXBURY TWP	Market to Affordable Program	Market to Affordable	Completed	6
MORRIS	WASHINGTON TWP	Buy-Down: 80 Fairview Ave	Market to Affordable	Completed	1
MORRIS	WASHINGTON TWP	Special Needs Housing Partnership- MTA	Market to Affordable	Under Construction	6
OCEAN	BARNEGAT TWP	Market to Affordable - Rental	Market to Affordable	Proposed/Zoned	
OCEAN	BARNEGAT TWP	Market to Affordable - Sale	Market to Affordable	Proposed/Zoned	
OCEAN	EAGLESWOOD TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
OCEAN	POINT PLEASANT BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
OCEAN	TOMS RIVER TOWNSHIP	103 Walnut St	Market to Affordable	Completed	12
OCEAN	TOMS RIVER TOWNSHIP	Foreclosure Prevention Prog	Market to Affordable	Proposed/Zoned	
OCEAN	TOMS RIVER TOWNSHIP	Market to Affordable Prog	Market to Affordable	Proposed/Zoned	
PASSAIC	CLIFTON CITY	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
SALEM	PITTSBORO TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
SALEM	UPPER PITTSBORO TWP	Market to Affordable, R2	Market to Affordable	Completed	1
SALEM	UPPER PITTSBORO TWP	Market to Affordable, R3	Market to Affordable	Proposed/Zoned	
SALEM	WOODSTOWN BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
SOMERSET	BERNARDS TWP	Crown Court - MTA	Market to Affordable	Proposed/Zoned	
SOMERSET	BERNARDSVILLE BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
SOMERSET	BRIDGEWATER TWP	Market to Affordable	Market to Affordable	Under Construction	2
SOMERSET	HILLSBOROUGH TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
SOMERSET	RARITAN BORO	Thompson Avenue	Market to Affordable	Proposed/Zoned	
SOMERSET	RARITAN BORO	Tilman Street	Market to Affordable	Proposed/Zoned	
SUSSEX	ANDOVER BORO	Buy-down Program	Market to Affordable	Proposed/Zoned	
SUSSEX	ANDOVER TWP	Market to Affordable	Market to Affordable	Proposed/Zoned	
SUSSEX	GREEN TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	1
SUSSEX	HAMBURG BORO	Buy Down Program	Market to Affordable	Proposed/Zoned	

County	Municipality	Project / Program		Status	
SUSSEX	HARDYSTON TWP	Market to Affordable Program	Market to Affordable	Under Construction	4
SUSSEX	MONTAGUE TWP	Market-to-Affordable Program	Market to Affordable	Proposed/Zoned	
SUSSEX	SPARTA TWP	Knoll Heights Village	Market to Affordable	Proposed/Zoned	
SUSSEX	SPARTA TWP	The Pointe	Market to Affordable	Proposed/Zoned	
UNION	BERKELEY HEIGHTS TWP	Market to Affordable	Market to Affordable	Proposed/Zoned	
UNION	CLARK TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
UNION	NEW PROVIDENCE BORO	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
UNION	SPRINGFIELD TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
UNION	UNION TWP	Market to Affordable Program	Market to Affordable	Under Construction	2
WARREN	ALLAMUCHY TWP	Panther Valley - Village IX	Market to Affordable	Completed	13
WARREN	BLAIRSTOWN TWP	Market to Affordable	Market to Affordable	Proposed/Zoned	
WARREN	GREENWICH TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
WARREN	HARMONY TWP	American Developers Buy Downs	Market to Affordable	Proposed/Zoned	
WARREN	HOPE TWP	Market to Affordable Program	Market to Affordable	Proposed/Zoned	
WARREN	KNOWLTON TWP	Knowlton MTA Prog	Market to Affordable	Proposed/Zoned	
WARREN	MANSFIELD TWP	Market to Affordable	Market to Affordable	Proposed/Zoned	

The projects, programs, and units in this report are based on information provided by each municipality, which is updated on an ongoing basis. Inclusion of an affordable housing program or project on this report does not certify that the units exist and/or meet COAH's criteria for credit.

EXHIBIT 10
ELSIE/BURNSIDE AVENUE ENVIRONMENTAL
CONSTRAINTS



Legend

- Watercourse (Stream, River, etc.)
- Floodway
- 100-Year Flood Plain
- 0.2 PCT Annual Chance Flood Hazard

Site Location & Conditions Map

Elsie/Burnside Zone
Block 402, Lots 14-18
Block 403, Lot 34
Cranford, New Jersey

EXHIBIT 11
MAY 14, 2015 REPORT ON UNMET NEED

Art Bernard and Associates, L.L.C.

Housing and Land Use Planning

May 14, 2015

Mr. Phil Caton
Clarke, Caton and Hintz
100 Barrack Street
Trenton, NJ 08608

Dear Phil:

The purpose of this report is to analyze COAH's implementation of its vacant land adjustment rule, N.J.A.C. 5:93-4.2, and compare it to efforts put forth by Cherry Hill to address its second round housing obligation. In preparing this report, I reviewed COAH's regulations and the requirements that COAH has imposed on municipalities since 1994. I personally reviewed the compliance reports written by COAH staff between 1994 and 2002 in March of 2002. I have also reviewed COAH's *Municipal Status Reports* of second round compliance (Appendix A). With regards to third round substantive certifications of municipalities that received a second round vacant land adjustment, I have relied on a July 25, 2013 planner's report, prepared by Ms. Mary Beth Lonergan, in a matter involving Haddonfield Borough and Estaugh Commons, L.L.C. (Appendix B) The Lonergan report (at pages 25-32) provides information regarding the efforts of ten municipalities to address the unmet need. The COAH compliance reports for each municipality are included in an Appendix to the Lonergan report. I have supplemented the data from these sources with COAH's December 20, 2013 data regarding the total number of units built in municipalities that have received vacant land adjustments. I have limited this analysis to municipalities before COAH because I am unaware of a data source that provides the same information for municipalities seeking repose in court.

The regional housing obligation is large. The capacity for municipalities to address the housing obligation with undeveloped land is finite. It is not uncommon for COAH to

find that there is a “poor fit” between the housing obligation assigned to a municipality and its capacity to address the housing obligation with undeveloped land.

N.J.A.C. 5:93-4 addresses situations where land is a scarce resource. The rule requires municipalities to compute the vacant land capacity (realistic development potential, or “RDP”) and develop a plan that addresses the RDP, which may include zoning, municipal construction and other techniques listed at N.J.A.C. 5:93-5.

Where the realistic development potential is less than the total housing obligation, municipalities must take appropriate action to address the portion of the fair share housing obligation in excess for the realistic development potential (the unmet need). It can include, but is not limited to, the collection of development fees, the creation of accessory apartments and overlay zones designed to create an incentive to build affordable housing.

Based on my analysis, I conclude that Cherry Hill’s plan for the unmet need is more extensive, substantive and successful than any plan that has been before the New Jersey Council on Affordable Housing (COAH). For example, in March of 2002, I found that 33 municipalities had received vacant land adjustments pursuant to N.J.A.C. 5:93-4.2. These are the same rules that Cherry Hill has relied on in preparing its 2009, 2011 and 2014 plans. They are the same rules referenced by the Supreme Court in its March 10th Decision. Of these 33 municipalities, COAH had granted substantive certification to 10 municipalities even though the municipality did not adopt any plan to address the unmet need. Eight (8) other municipalities were certified based on plans, where the only response to the unmet need was the adoption of a development fee ordinance. *Therefore, as of 2002, COAH certified more than half of the 33 plans involving a vacant land adjustment without requiring the municipalities to create any affordable housing to address the unmet need.*

Only 13 of the 33 (39 percent) municipal plans included overlay zones. In Paramus, the overlay zone required a 50 percent set-aside for affordable housing. In the past, COAH

has found set-asides greater than 20 percent problematic. Due to concerns about the financial incentive, the highest set-asides permitted by N.J.A.C. 5:93-5.6(b) is 20 percent. Paramus has not addressed any affordable housing in response to its unmet need.

COAH certainly has not required a precise, or even a proportional relationship between the maximum possible yield of the overlay zone and the unmet need. For example, in Haworth Borough the unmet need is 53 units.¹ The Haworth overlay zone affects a 10-acre site. The 10 acres are zoned at six (6) units per acre and a 20 percent set-aside. This overlay zone can yield a maximum of 12 affordable units.

In Park Ridge Borough, the COAH Compliance Report calculates the potential yield of the overlay zone to be 22 affordable units. The unmet need is 43 units.

In Ocean City and Watchung, the unmet need (343 for Ocean City and 37 for Watchung) is being addressed through the collection of development fees and an accessory apartment ordinance. I have reviewed the results of COAH monitoring of accessory apartments and found that few have produced more than 10 over a six-year period. Most of the municipalities that plan for accessory apartments had produced none. Neither Ocean City nor Watchung have produced any housing in response to the unmet need.

In Ewing, there is an overlay zone that allows a 99-acre farm to be developed at eight (8) units per acre with a 20 percent set-aside. Assuming that a future developer chooses the affordable housing option, this site has the potential to yield only 158 units of a 234 unit unmet need.

Mary Beth Lonergan's report for the Borough of Haddonfield highlights 10 more recent COAH substantive certification situations involving a vacant land adjustment:

¹ Unmet need was determined from *COAH Report and the COAH Status of Municipalities Addressing Second Round Municipalities (1987-1999)*.

On March 10, 2010, COAH certified Demarest's plan for an unmet need of 43 units. The plan included subsidizing seven (7) market rate units to be affordable to low and moderate-income households and a five (5) unit accessory apartment program. At best, these mechanisms could address 12 units of the 43-unit unmet need.

On August 12, 2009, COAH certified South Hackensack's plan for an unmet need of 49 units with 24 existing age-restricted units. The plan also included the collection of development fees and a Borough-wide set-aside requirement for any residential development of more than five units. As of the end of 2013, no additional affordable housing had been constructed in South Hackensack.

On June 10, 2009, COAH certified Beverly's plan for an unmet need of 18. COAH granted Beverly credit for: five (5) units created by Habitat for Humanity; four (4) age restricted units; and seven (7) units created by the Burlington County Community Action Program.

On November 12, 2009, COAH certified Somerdale Borough's plan for addressing an unmet need of 91. The plan envisioned collecting development fees and adopting an overlay zone that would allow retail on the first floor and apartments on the second floor at Block 10, Lots 9 and 10. The approved ordinance allowed no more than 10 units above the stores and all the apartments were required to be affordable to low and moderate-income households. The ordinance required a 20 percent set-aside attached to any housing on Block 120, Lot 1.

On October 14, 2009, COAH granted Cape May City substantive certification. The Borough created an overlay zone to meet a 58-unit unmet need. The overlay zone requires a 25 percent set-aside. The set-aside has been determined to be excessive by the Appellate Division and Supreme Court. The plan for the unmet need also included a settlement with DEP that will enable a private developer to build 14 affordable units. COAH has no record of any housing being constructed in Cape May.

On July 8, 2009, COAH granted Cape May Point substantive certification though it provided no plan for an unmet need of 29 units.

Stone Harbor had an unmet need of 141 units when COAH granted it substantive certification on October 14, 2009. The Borough's plan for its unmet need was to allow apartments to be constructed in its business zone. The ordinance requires that 20 percent of the apartments be affordable to low and moderate-income households. COAH has no record of any affordable housing being constructed in Stone Harbor.

On April 8, 2009, COAH granted substantive certification to Flemington Borough's plan for a 34 unit unmet need. The Borough addressed all 34 units with age restricted housing.

On March 10, 2010, COAH granted substantive certification to Pine Beach Borough. The Borough's plan for a 41 unit unmet need had the potential to address four (4) units.

On March 10, 2010, COAH granted Haddonfield substantive certification. COAH computed Haddonfield's unmet need of 155 units. COAH allowed the Borough to receive credit for 23 existing units of age-restricted housing. It also granted the Borough credit for housing that has never been built on property owned by Bancroft. In fact, more than five (5) years after substantive certification some of the property has not been zoned for inclusionary development. The remaining response to the unmet need was an ordinance that required one (1) affordable unit to be constructed for every five (5) units constructed in any development. The areas impacted are all developed. There is no density bonus associated with building affordable housing and no affordable housing has resulted from the ordinance.

In contrast, Cherry Hill received a vacant land adjustment in 1993. In granting the vacant land adjustment, the court found that Cherry Hill had a realistic development potential of 706 units. Based on a second round fair share of 1,669 low and moderate-income housing units, the Township had an unmet need of 963. Over the years, the Township has addressed its unmet need through the location of group homes, supporting 100 percent affordable developments, granting use variance applications, supporting mixed used development applications, etc. In all, the Township has facilitated the construction of 1,067 affordable sales and rental units. It has also granted approvals for 317 additional affordable sales and rental units. In other words, the Township has created a realistic opportunity for 1,384 units.

The Township's second round housing obligation is 1,699 units. COAH imposes a rental obligation on each municipality that, in its most simplified form, equals 25 percent of the municipal fair share. Cherry Hill has a second round rental obligation of 425 units. COAH's second round rules provide a rental bonus for non-age restricted rentals that address the rental obligation. Cherry Hill has created 337 non-age restricted rentals: 120 at Sergi Farms; 26 at Sergi Commons; 36 at Brunetti; 108 in group homes, 35 at Dwell;

and 12 thus far at the Race Track site. The rental bonus for these 337 rentals means that Cherry Hill has sufficient credits to address its entire second round housing obligation of 1,669 low and moderate income units. The rental bonus for the 337 constructed non-age restricted rentals alone provides the Township with over 1,700 credits. The Township, which, in 1993, was determined to have a realistic development potential of 706 units has addressed its entire 963 unit unmet need and it is still working on ways to address more.

I have created a chart to place Cherry Hill's performance in context. The chart provides data on 54 municipalities that have received vacant land adjustments from COAH. The chart provides the fair share number, the realistic development potential and the units actually constructed in response to the unmet need. Units constructed toward the unmet need is calculated by subtracting units built from the realistic development potential. If the units built exceed the RDP, the municipality is given credit toward the unmet need (since the unmet need is that portion of the housing obligation in excess of the RDP). The data regarding the certification date and fair share are derived from COAH's Second Round *Municipal Status Report* as well as the narrative and appendices in the Lonergan Report. The RDP is derived from the *Municipal Status Report* by subtracting the numerical vacant land adjustment from the new construction obligation (see new and adjustment columns). It is also derived from the COAH Compliance Reports in the appendix of Ms. Lonergan's report. The units constructed are gleaned from COAH's monitoring records as of December 20, 2013.

Of the 54 municipalities, 28 municipalities (more than half) have not created a single affordable unit in response to its unmet need.

Cherry Hill has created 1,067 units so far. (Appendix C) Since its realistic development potential was calculated to be 706, the Township has created 361 units toward its unmet need. This is almost twice as many as the closest municipality, Westwood, which has produced 183 units toward its unmet need.² The 361 units toward the unmet need is 29

² The units constructed data from COAH does not indicate if units were built in response to the unmet need or were already in place. However, the information provided in this

percent of the total units created toward the unmet need of the 54 COAH municipalities combined (1,254 units).

In addition, Cherry Hill has granted approvals for 317 additional affordable units, many of which are currently being constructed. If each of these units are completed, Cherry Hill would have completed 678 units toward its unmet need, 54 percent as much as the 54 COAH municipalities combined.

The data demonstrate that Cherry Hill has done far more towards promoting affordable housing through redevelopment than any other community before COAH. Its performance stands in stark contrast to the picture of the Township painted by Fair Share Housing Center.

I hope this information is helpful.

Yours truly,



Art Bernard, P.P.

report regarding COAH's requirements to address the unmet need, would indicate that there are not many more units in the pipeline in COAH's 54 municipalities.

<u>Municipality</u>	<u>Certification Date</u>	<u>Fair Share</u>	<u>RDP</u>	<u>Units Built</u>	<u>Units Toward Unmet Need</u>
Atlantic					
Mullica	3/4/98	39	0	0	0
Bergen					
Closter	2/4/03	111	62	78	16
Demarest	3/10/10	66	23	4	0
Fair Lawn	10/2/96	152	52	88	36
Glen Rock	10/2/96	118	0	15	15
Haworth	3/3/99	65	12	6	0
Ho-Ho-Kus	10/7/98	83	0	0	0
Leonia	7/16/02	31	10	13	3
Midland Park	8/11/04	54	13	64	51
Montvale	12/15/04	255	188	63	0
Northvale	9/6/95	86	0	10	10
Norwood	9/8/04	118	25	52	27
Paramus	1/7/98	698	260	121	0
Park Ridge	6/5/96	112	69	49	0
Ridgefield	7/10/96	47	0	0	0
Ridgewood	5/5/04	229	137	151	14
Rockeleigh	11/4/98	84	12	16	4
South Hackensack	8/12/09	50	1	0	0
Uppe Saddle River	6/7/00	206	107	42	0
Waldwick	9/6/00	81	32	19	0
Westowod	;04/07/04	87	12	195	183
Woodcliff Lake	11/6/02	170	82	82	0
Burlington					
Bevelry	7/10/96	19	0	41	0
					41

Riverton	11/1/00	15	2	0	0
Camden					
Bellmawr	11/22/04	107	6	138	132
Haddonfield	7/7/99	192	37	56	19
Mount Ephraim	11/22/04	32	17	33	16
Somerdale	11/12/09	95	4	30	26
Cape May					
Cape May City	7/9/97	58	0	0	0
Cape May Point	7/8/09	34	0	0	0
North Wildwood	1/5/99	80	7	142	135
Ocean City	10/4/00	411	68	68	0
Stone Harbor	10/4/09	141	0	0	0
Essex					
Roseland	8/5/98	182	162	82	0
Hunterdon					
Flemington	8/6/03	38	4	71	67
Mercer					
Ewing	2/7/01	481	247	270	0
Hopewell Boro	12/6/00	29	19	1	23
Pennington	6/3/02	52	20	6	0
Middlesex					
Metuchen	8/2/00	99	20	167	0
Monmouth					
Manasquan	12/15/04	149	0	0	0
Red Bank	3/5/97	428	0	204	204
Morris					
Mountain Lakes	3/5/97	80	18	0	0

Rockaway Boro	4/2/97	44	0	4	4 0
Ocean					
Pine Beach Boro	10/6/99	42	0	5	5
Somerset					0
Raritan Boro	8/2/00	81	24	48	24
Watchung	7/1/98	206	169	51	0
Union					0
Fanwood	6/5/00	45	8	21	13
New Providence	5/11/98	134	54	87	33
Totals		6216	1983	2593	1248
Cherry Hill		1,699	706	1,067	361

APPENDIX A
COAH MUNICIPAL STATUS REPORT

COAH MUNICIPAL STATUS REPORT

MUNICIPALITY	Status	Under COAH	File Date	Petition Date	Petition Submittal	Mediation	Court Case Date	Final Court Date	Assess Date	Other Assess Date	Board App. Case	Approved at Certification										Data in excess of obligation																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
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ORDER OF THE BOARD OF DIRECTORS

COAH MUNICIPAL STATUS REPORT

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COAH MUNICIPAL STATUS REPORT

MUNICIPALITY		Status	Under COAH	File Date	Petition Date	Petition 3rd round	Mediation	Court Cost Date	Final Cost Date	Assess Date	Other Action Date	Board List	187799	Subs	New	Adjustment	Total 187799	New	COAH	Prior	Ref. Date	Subs	New	NCA	Total	Special	Prior	New	Subs
Palo Alto		certified	X	09/21/98	01/17/03				10/22/04				48	22	26		10				38	12	26		1	1			
Tulare		certified	X	06/27/95	07/24/99				02/01/96	09/05/01			177	24	133		4	135	38		0	0	0	0	1	1			599
Tulare		certified	X	06/27/95	07/24/99				06/07/00				552	44	508		14	462	24		66	44	22	2	1	1			
Tulare		certified	X	06/27/95	07/24/99				05/11/05				168	41	127		22	11	9		63	27	36	2	1	1			
Tulare		certified	X	05/15/96	04/15/99				06/11/04				33	33	302		7	213	35		34	0	0	0	1	1			9
Tulare		certified	X	05/15/96	04/15/99				06/07/01				797	84	713		17	806	195		0	0	0	0	1	1			221
Tulare		certified	X	06/01/95	03/01/95				02/07/01				40	3	37		31	491	146		7	3	3	4	1	1			K3
Tulare		certified	X	06/01/95	03/01/95				07/09/97				482	21	461						0	0	0	0	1	1			67
Tulare		certified	X	11/22/02	11/18/03				03/05/07				22	8	307		21	238	77		0	23	23	0	1	1			
Tulare		certified	X	06/18/95	04/28/95				11/05/03				89	89	0		53				75	2	73	0	1	1			
Tulare		certified	X	03/06/95	03/06/95				01/17/03				94	34	81		10	31			27	27	21	1	1	1			11
Tulare		certified	X	03/06/95	03/06/95				04/02/00				115	34	25		31	4			23	2	21	1	1	1			
Tulare		certified	X	01/03/01	01/03/01				01/03/01				27	2	25		18	1			0	0	0	0	1	1			
Tulare		certified	X	01/03/01	01/03/01				01/07/04				19	18	1		27	320	121		113	15	98	2	1	1			
Tulare		certified	X	01/03/01	01/03/01				01/09/96				585	42	206		37	117	20		39	7	32	1	1	1			
Tulare		certified	X	09/26/94	07/10/95				07/01/98	05/03/00			219	13	206		6												
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APPENDIX B
THE LONERGAN REPORT

**PLANNER'S REPORT
FOR THE
BOROUGH OF HADDONFIELD
CAMDEN COUNTY, NEW JERSEY**

***Estaugh Commons, LLC, and Health Resources
of New Jersey, LLC, Plaintiffs***

v.

***Borough of Haddonfield et al., Defendants
Docket No. CAM-L-2473-10***

July 25, 2013

Prepared For:

The Borough of Haddonfield

Prepared By:


Mary Beth Lonergan, PP, AICP
New Jersey Professional Planning License No. 4288

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100 Barrack Street
Trenton, New Jersey 08608



COAH analyzes each municipal plan and requires compliance mechanisms to address unmet need that fit the specific circumstances of the municipality. COAH's regulations at N.J.A.C. 5:97-5.3(b) state that COAH,

"shall review the existing municipal land use map and inventory pursuant to N.J.A.C. 5:97-5.2(c)6 for areas that may develop or redevelop. After such an analysis, the Council may require one or any combination of the following in an effort to address the unmet need: [emphasis added]

1. Zoning amendments that permit apartments or accessory apartments in accordance with N.J.A.C. 5:97-6.8;
2. A market to affordable program in accordance with N.J.A.C. 5:97-6.9;
3. Overlay zoning requiring inclusionary development in accordance with N.J.A.C. 5:97-6.4. In approving an overlay zone, the Council may allow the existing use to continue and expand as a conforming use, but provide that when the prior use on the site is changed, the site shall produce low and moderate income housing;
4. A redevelopment area that includes affordable housing pursuant N.J.A.C. 5:97-6.6, utilizing the standards in N.J.A.C. 5:97-6.4(b);
5. The adoption of a development fee ordinance pursuant to N.J.A.C. 5:97-8.3 and a plan for the use of development fees pursuant to N.J.A.C. 5:97-8.10; and/or
6. Age-restricted units and RCAs may be applied to unmet need subject to the formulas in N.J.A.C. 5:97-3, except that age-restricted units to address unmet need that were included in the municipality's prior round certification or judgment and are constructed or have preliminary or final approvals at the time of the municipality's petition are not subject to the formulas in N.J.A.C. 5:97-3."

A total of 306 municipalities have petitioned COAH with third round plans pursuant to COAH's 2008 regulations. Of the 306 petitioned plans, COAH granted substantive certification to 68 municipal plans prior to the Appellate Division's October 8, 2010 decision. I analyzed all 68 of COAH's third round substantive certifications and focused on

the 10 municipalities that received a prior round V/L from COAH as part of its third round substantive certification.⁸ Haddonfield Borough was one of the 10 municipalities that received third round COAH certification and received a prior round V/L. In the 10 third round certified V/L municipalities, COAH required as few as one mechanism to address unmet need with the most mechanisms towards unmet need - five - which were included in Haddonfield's plan. Virtually all of the supposed deficiencies raised by the Plaintiffs' Planner regarding Haddonfield's means to address unmet need are debunked through this analysis. Just as set forth in COAH's regulations, COAH requires that municipalities provide one or more means to address unmet need. As discussed in detail below, Haddonfield went above and beyond what COAH typically requires.

Below is a summary of each of the 10 certified municipalities with a prior round V/L (see Exhibit F for each COAH resolution and report discussed below):

1. Demarest Borough, Bergen County – The Borough has a prior round need of 66 units and by virtue of a COAH-approved V/L, the prior round obligation was adjusted to a 23-unit RDP and a 43-unit unmet need. According to COAH's substantive certification resolution #59-18 and attached staff compliance report dated January 20, 2010, COAH approved two compliance mechanisms to address unmet need – a 5-unit accessory apartment program and a 7-unit market-to-affordable program. The COAH report notes that the Borough will first produce five accessory apartments to address its RDP and then an additional five accessory apartment units will address unmet need. In its second round plan, the Borough was required to “adopt an accessory apartment ordinance and a development fee ordinance as mechanisms to address its unmet need. Although Demarest adopted both a development fee ordinance and an accessory apartment ordinance in 2001, the Borough has not created

⁸ Although many more municipalities have prior round vacant land adjustment requests in their petitioned plans, I focused only on those plans which received third round substantive certification from COAH to provide confirmation of COAH's unmet need process.

any accessory apartments to date." Thus, COAH approved the possible creation of 12 units and an unquantifiable development fee ordinance to address a 43-unit prior round unmet need as part of the Borough's third round substantive certification.

2. South Hackensack Township, Bergen County – The Township has a prior round need of 50 units. Through the vacant land adjustment process, the prior round obligation was recalculated by COAH to a one-unit RDP and a 49-unit unmet need. According to COAH's substantive certification resolution #25-09 and attached staff compliance report dated July 25, 2009, COAH approved three previously certified compliance mechanisms to address unmet need – 24 excess senior affordable rentals, an adopted development fee ordinance and "the continued applicability of a previously approved overlay zone that requires a 20% set-aside in any residential development of five or more units." In addition, the COAH resolution states that the three previously certified compliance mechanisms – a development fee ordinance, the overlay ordinance and excess senior rental credits, "continue to present a realistic opportunity for creating affordable housing units should South Hackensack experience further development or redevelopment." [emphasis added] The COAH report notes that no affordable housing units have been created from the overlay zoning since its earlier adoption in 2004. The COAH Report stated, "South Hackensack is addressing a portion of the Prior Round Unmet Need with previously approved unmet need mechanisms, including a development fee ordinance, a municipal-wide overlay zone and the 24 remaining age-restricted rental units at the Madeline project. As required under N.J.A.C. 5:97-5.2(c), COAH has reviewed South Hackensack's existing land use map and inventory for areas that may develop or redevelop and has determined that it is not necessary at this time to require new or additional mechanisms to address Unmet Need. The mechanisms in place continue to present a realistic opportunity for the production of affordable housing." Thus, COAH approved 25 excess senior units, a development fee ordinance with no amount of units calculated to be produced and an overlay zone with no units yet produced and no calculation

as to the number that may be produced to address a 49-unit prior round unmet need as part of the Township's third round substantive certification.

3. Beverly City, Burlington County – The City has a prior round need of 18 units and by virtue of a V/L, the prior round obligation was adjusted to a 0-unit RDP and an 18-unit unmet need. According to COAH's substantive certification resolution #13-09 and attached staff compliance report dated May 21, 2009, the City had proposed 18 existing affordable housing credits from three affordable housing developments to address the 18-unit unmet need but COAH found that two (2) of the 18 credits had been foreclosed and were no longer eligible for credit. COAH did not require additional credits and approved the 16 credits towards unmet need but did not require any additional means to address the remaining 2-unit balance of unmet need.

4. Somerdale Borough, Camden County - The Borough has a prior round need of 95 units and by virtue of a V/L, the prior round obligation was recalculated by COAH to a 4-unit RDP and a 91-unit unmet need. According to COAH's substantive certification resolution #50-09 and attached staff compliance report dated October 27, 2009, COAH approved two mechanisms – a development fee ordinance and overlay zoning on two sites. Overlay zoning on the first site would permit a "mixed-use development with retail on the first floor and affordable family rentals above with no more than 10 units, all affordable allowed...." The only information in the COAH report provided on the overlay zoning on the second site was that the overlay "ordinance also requires a 20 percent set aside from development resulting from demolition and/or reconstruction of the existing structures...." There was no analysis noted in the COAH report as having been done to determine the total number of affordable units that might be produced on the second site. Thus, COAH approved a development fee ordinance with no number of units calculated to be produced and an overlay zone on two sites with a calculation that all ten residential units permitted would be affordable on one site and no calculation as to the number of affordable units that may be

produced through redevelopment on the second site to address a 91-unit prior round unmet need as part of the Borough's third round substantive certification.

5. Cape May City, Cape May County - The City has a prior round need of 58 units and by virtue of a COAH-approved V/L, the prior round obligation was recalculated to a 0-unit RDP and a 58-unit unmet need. According to COAH's substantive certification resolution #37-09 and attached staff compliance report dated September 25, 2009, COAH approved two mechanisms to address unmet need - 14 affordable units in a proposed inclusionary development and overlay zoning on six areas. COAH's report states, "The six areas total approximately 53 acres and may yield between 24 and 129 affordable units based on economic and environmental constraints.... The lots are a mix of privately and publicly owned land and are a mix of vacant, underutilized and developed properties." The COAH report permits the minimum number of 24 affordable units projected from the overlay zoning to be counted. Thus, COAH approved 38 potential affordable housing units from proposed inclusionary zoning and overlay zoning to address a 58-unit prior round unmet need as part of the City's third round substantive certification.

6. Cape May Point Borough, Cape May County - The Borough has a prior round need of 34 units and by virtue of a V/L, the prior round obligation was recalculated by COAH to a 0-unit RDP and a 34-unit unmet need. According to COAH's substantive certification resolution #21-09 and attached staff compliance report dated June 18, 2009, COAH approved the Borough's adoption of a development fee ordinance as the only means to address unmet need. COAH's compliance report concludes that the development fee ordinance as the only mechanism in place continues "to present a realistic opportunity for the production of affordable housing." Thus, COAH approved a development fee ordinance with no calculation as to the number of affordable housing units that may be produced as the only means to address a 34-unit prior round unmet need as part of the Borough's third round substantive certification.

7. Stone Harbor Borough, Cape May County - The Borough has a prior round need of 141 units and by virtue of a V/L, the prior round obligation was recalculated by COAH to a 0-unit RDP and a 141-unit unmet need. According to COAH's substantive certification resolution #38-09 and attached staff compliance report dated September 25, 2009, COAH approved one means to address unmet need - the Borough's overlay zone which overlays the Business District and may produce 70 affordable units. "The Borough has recommended permitting second story additions to the one story units for apartment units provided there was one affordable unit for every four market rate units. Stone Harbor estimates that there are 70 single-story structures in the Business District and that each could accommodate one affordable unit; therefore, the Borough is estimating a maximum of 70 affordable housing units could be built to address the unmet need." Also, although not listed in the COAH report or resolution as a means to address unmet need, the Borough also adopted a development fee ordinance. Thus, COAH approved an overlay zone that may produce 70 affordable units and a development fee ordinance as the means to address a 141-unit prior round unmet need as part of the Borough's third round substantive certification.

8. Flemington Borough, Hunterdon County - The Borough has a prior round need of 38 units and by virtue of a V/L, the prior round obligation was recalculated by COAH to a 4-unit RDP and a 34-unit unmet need. According to COAH's substantive certification resolutions #3-09(a) and #3-09 and attached staff compliance report dated March 19, 2009, COAH approved 34 excess senior affordable rentals to address the 34-unit unmet need.

9. Pine Beach Borough, Ocean County - The Borough has a prior round need of 41 units and by virtue of a V/L, the prior round obligation was recalculated by COAH to a 0-unit RDP and a 41-unit unmet need. According to COAH's substantive certification resolution #62-18 and attached staff compliance report dated January 21, 2010, COAH approved four mechanisms to address unmet need - one (1) affordable unit from a Borough-approved inclusionary

development, three (3) proposed special needs credits, overlay zoning and a development fee ordinance. There was no calculation of potential affordable housing to be produced from the overlay zoning in the Borough's B-1 District in either the COAH Report or Resolution. Thus, COAH approved four (4) proposed affordable units, a development fee ordinance with no number of units calculated to be produced and an overlay zone with no calculation as to the number of affordable units that may be produced to address a 41-unit prior round unmet need as part of the Borough's third round substantive certification.

Lastly, I've provided the same type of summary for Haddonfield Borough as I did for the other nine COAH certified V/L municipalities.

10. Haddonfield Borough, Camden County – The Borough has a prior round obligation of 192 units and through the V/L process, the prior round obligation was recalculated to a 37-unit RDP and a 155-unit unmet need. According to COAH's substantive certification resolution #61-18 and attached staff compliance report dated January 27, 2010, COAH approved five compliance mechanisms towards unmet need – 16 units proposed in excess of the RDP, 23 existing excess senior affordable rental units, possible redevelopment activity in the Borough with three sites (PATCO, Acme and PNC Bank) quantified totaling 50 affordable units, a previously adopted affordable housing development fee ordinance and a previously adopted overlay zone that requires a 20% set-aside from any residential development of five or more units in the Borough. Thus, COAH approved existing affordable credits and the possible creation of affordable units totaling 89 units, a development fee ordinance and a Borough-wide affordable housing overlay zone to address a 155-unit prior round unmet need as part of the Borough's third round substantive certification.

Clearly, the compliance mechanisms proposed by the Borough in its adopted 2008 third round plan and certified by COAH on March 10, 2010 address COAH's unmet need

regulations at N.J.A.C. 5:97-5.3 and are similar to the type of compliance mechanisms that COAH approved in nine other third round substantive certifications for municipalities receiving a prior round V/L. The five mechanisms proposed by the Borough and certified by COAH clearly exceed what COAH approved for other communities.

In addition, as noted above, the Borough's plan noted that the quantification of potential residential units on three sites (PATCO, Acme and PNC Bank) in the Downtown Zoning District was not meant to be all inclusive, rather it was "to give COAH a sense of the potential affordable housing units that may be produced throughout the Borough, especially in the Downtown Zoning..." The Downtown Zoning Districts encompass approximately 250 parcels (see Map 1 below). The analysis of the potential redevelopment of three (3) of the 250 parcels in the Borough's plan helped COAH see that the residential development and redevelopment potential incorporated in the 2008 adopted Downtown Zoning Districts would trigger a 20% affordable housing setaside as the result of the Borough-wide affordable housing overlay zone. There are other sites as well that may redevelop in the future but were not set forth in the Plan. For example, developments such as the 100 Ellis, LLC, residential development were approved for 12 total units which were required to produce 2 affordable housing units. According to Borough staff, additional developers have approached the Borough about possible redevelopment activity in the Downtown Districts such as One Centennial Square on Euclid Avenue which is currently occupied as office space but had been discussed for possible residential use. These and many others represent additional potential affordable housing opportunities in the Borough but were not quantified as COAH's regulations do not require such upfront accounting.

As can be seen in the analysis of just the 10 third round substantive certifications of municipalities with prior round V/L, COAH's regulations do not require an upfront one-for-one specific number of credits to address unmet need, rather COAH may approve unmet need compliance mechanisms that do not have an upfront calculation of the number of

CHERRY HILL COMPLIANCE SUMMARY CHART

CHERRY HILL TOWNSHIP AFFORDABLE HOUSING CALCULATIONS

Development	For Sale	Rental	Special Needs/Supportive	Very Low	Senior	10-14/60+	15-19/50+	20-24/40+	Total Credits	Notes
Jewish Federation (Solomon)	-	104	-	-	104	104	-	-	115	Built: AR/S
Gaerher House (Dublin)	-	75	-	-	75	75	-	-	75	Built: AR/S
Serf Farms	-	120	-	-	-	120	-	-	240	Built: FR
Serf Commons (c/o MSA Commons)	-	26	26	26	-	26	26	26	52	Built: SN/S
Burleigh	-	36	-	-	-	36	36	-	72	Built
Leopold	2	-	-	-	-	2	-	-	2	Built
Credits Without Controls	31	-	-	-	-	31	-	-	31	Built
ARHAT	-	38	-	-	-	38	38	-	76	Built: FR
Scattered Site Sales	70	-	-	-	-	70	-	-	70	Built
Alternative Living	-	-	60	60	-	60	56	SN/S	116	Built: SN/S
Dwell/Al Cherry Hill	-	35	-	-	-	35	35	FR	70	Built: FR
Garden State Park - Constructed	10	12	-	-	-	22	12	FR	34	Built: FR
Garden State Park - Planned/Approved	83	149	-	-	105	232	-	FR	232	10 For Sale Built: 12 Rentals Built Planned/Approved: FR: AR/S; For Sale: Mix Planned/Approved: For Sale: it moved off-site additional affordable units will be required
Centura	32	-	-	-	-	32	-	-	32	Built: AR/S; R
Benedict's Place	-	74	-	-	74	74	-	AR/S	74	Planned/Approved: Under Construction: AR/S
St. Thomas	-	6	-	-	6	6	3	FR	6	Built (Currently Undergoing CO Process); FR
The Grange	-	3	-	-	-	3	-	-	116	Built
Least Cost Housing	116	-	-	-	-	116	-	-	54	Planned/Approved: FR
Evans-Francis Estates	-	54	-	-	-	54	-	FR	54	Planned/Approved: SN/S
Regency Court	-	6	6	6	6	6	15	SN/S	6	Built: SN/S
Spring Hill	-	15	15	15	15	15	35	SN/S	30	Built: SN/S
Group Homes 2013	-	35	35	0	-	35	35	SN/S	70	Built: SN/S
Pro-Build	-	23	-	3	-	23	-	-	23	In litigation, use (D) variance approved
St. Mary's Village Apartments	-	152	-	-	152	152	-	AR/S	152	Built: Not subject to Age-Restricted Cops as it was built between April 1, 1980 and December 15, 1986
Group Homes 2015	-	17	-	17	-	17	17	SN/S	34	Built: SN/S
Total Cops	344	980	142	127	379	1,384	393	1,787	1,787	Gross Credits
							21			

^A 36 units actually built per Court Master Report dated June 12, 2014

^b Two (2) Additional Units Acquired with CDBG Funds & Deed Restricted

^c Three (3) Units currently being processed for Certificate of Occupancy (CO)

^D Units built in 1983 through HUD 202 Funding (Capital Advance 40-year Commitment)

[£] Group Homes received CO between 2014-2015