

# **FOURTH ROUND HOUSING ELEMENT AND FAIR SHARE PLAN**

Corbin City  
Atlantic County, New Jersey

May 2025  
Adopted by the Planning Board on May 19, 2025

Prepared By:



**Heyer, Gruel & Associates**  
Community Planning Consultants  
236 Broad Street, Red Bank, NJ 07701  
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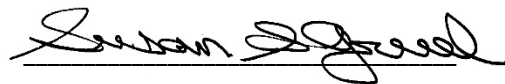
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Susan Gruel, P.P. #1955

*With contributing content by Hanah Davenport, AICP Candidate*

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## **EXECUTIVE SUMMARY**

Corbin City is a 7.7 square mile community located in southeast New Jersey, within the southern portion of Atlantic County that abuts the neighboring County of Cape May. The City shares municipal boundaries with Estell Manor City to the north and west, Egg Harbor Township to the north and east, and Upper Township in Cape May County to the south.

The City's land area—specifically the west portion—is largely defined by bodies of water, including a number of rivers, creeks, and Category 1 streams that run through the City. Most notably, Corbin City is bound by the Great Egg Harbor Bay to the east, the Tuckahoe River to the south, the Middle River to the north. Corbin City has no access to public sewer and is within the Forest Management Area designation in the Pinelands Comprehensive Management Plan for the Pinelands National Reserve. The City is additionally completely within the jurisdiction of Coastal Area Facility Review Act ("CAFRA") regulations.

According to the 2020 Census, Corbin City's population was 471, which represents a decrease of 4.3% from 2010. In 2020, the City's median age was 46.6 years, representing a 19.2% increase from the median age of 39.1 years in 2010. The City's average household size in 2020 was 2.9 persons, which was slightly higher than the average at the County level (2.42 persons).

The housing stock of the City is predominantly (77.8%) single-family detached dwelling units. Approximately 27.8% of the housing stock was built prior to 1970, making just over a quarter of the City's housing older than fifty years. The City is located in Housing Region 6, a region that consists of the counties of Atlantic, Cape May, Cumberland, and Salem. Based on the 2024 Regional Income Limits (released by Affordable Housing Professionals of New Jersey on April 12, 2024), the median income in Region 6 for a four-person household is \$98,360, the moderate-income is \$78,688, the low-income is \$49,180, and the very-low-income level is \$29,508.

Affordable housing obligations in New Jersey are divided into "housing rounds," as will be discussed in detail later in this Plan. Each municipality in New Jersey has a constitutional obligation to provide their fair share of the calculated regional need for affordable housing within the respective housing round. These obligations to construct new affordable housing are known as the "Prospective Need" obligation. Municipalities also have an obligation to rehabilitate units that are deemed substandard, pursuant to the criteria of the Fair Housing Act. This obligation is known as the Present Need, or Rehabilitation Share. The housings rounds are as follows: Prior Round (1987-1999), Third Round (1999-2025), and Fourth Round (2025-2035).

Corbin City was a participant in the Third Round of affordable housing. On November 14, 2017, the City entered into a Settlement Agreement with the Fair Share Housing Center to establish its Third Round affordable housing obligation (see Appendix A). The subsequent compliance efforts were approved by the

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Court in a Final Judgement of Compliance and Repose, dated August 31, 2018, confirming the City satisfied its Third Round obligations.

It was determined in the 2017 Settlement Agreement that the City would not realistically be able to meet its Prior Round and Third Round obligations due to a number of factors, including: its total lack of public sewer; development limitations placed on the City under CAFRA and Pinelands regulations; and the fact that the State owns over two-thirds (69.3%) of the land within Corbin City.

The City agreed to conduct a Credit Without Controls survey to determine if any existing units in the Trailer and Mobile Home District may be credit worthy, with the understanding that the remainder of the City's obligation not met through such credits would be addressed through a durational adjustment. The City Council approved Resolution #91-2018 on October 9, 2018, authorizing the mailing of the survey and a total of 15 surveys were received in response. These surveys indicated that seven of the surveyed properties met the criteria to be considered eligible as affordable units without controls. At the time of the writing of this Plan, the entirety of the City's Prior and Third Round obligations remain deferred until adequate water and/or sewer are made available.

The City has a Fourth Round obligation as follows:

Rehabilitation Share: 0 units

Prospective Need: 6 units

Given the City's continued lack of sewer and regulation under CAFRA and the Pinelands, Corbin City's Fourth Round 6-unit Prospective Need obligation will be addressed through a durational adjustment.

## INTRODUCTION

The need to provide a realistic opportunity for the construction of affordable housing in New Jersey, the country's most densely populated state, has been recognized for decades. In the case of Southern Burlington County NAACP v. the Township of Mount Laurel 67 N.J. 151 (1975) (commonly known as Mount Laurel I), the New Jersey Supreme Court established the doctrine that developing municipalities in New Jersey have a constitutional obligation to create a realistic opportunity for their fair share of low and moderate income housing.

In Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158, 456 A.2d 390 (1983), decided on January 20, 1983 (commonly known as Mount Laurel II), the Supreme Court acted to address the response of municipalities to Mount Laurel I. The builder's remedy created a mechanism for developers to sue non-compliant municipalities and force them to comply. Mount Laurel II also created the Judgment of Repose to incentivize municipal compliance. A Judgment of Repose protected municipalities from potential lawsuits and those who would claim entitlement to a builder's remedy or other relief based upon the claim that the municipality was noncompliant.

In the wake of Mount Laurel II, developers sued municipalities seeking builder's remedies. The wave of builder's remedy lawsuits created the impetus for legislation to protect municipalities from builder's remedies. A decision by Judge Serpentelli, one of three judges appointed by Chief Justice Wilentz to implement Mount Laurel II, increased the need for a legislative cure. More specifically, in 1984, Judge Serpentelli issued the "AMG decision" (AMG Realty Co. v. Warrant Tp), which established a formula for any developer to determine the fair share obligation of any municipality.

The pressure of builder's remedy suits, combined with the ease in determining the fair share of any municipality through the AMG formula, culminated in the enactment of the New Jersey Fair Housing Act in 1985. The Fair Housing Act (FHA) is found at N.J.S.A. 52:270-301, et seq. The FHA established the Council on Affordable Housing (COAH) as an administrative alternative to builder's remedy lawsuits and the concomitant jurisdiction of the courts. COAH was given the responsibility of dividing the state into housing regions, determining regional and municipal fair share affordable housing obligations, and adopting regulations that would establish the guidelines and approaches that municipalities may use in addressing their affordable housing need.

In 2008, the Legislature amended the FHA to add requirements for very low-income housing. Very low-income households are those in which the gross household income is 30% or less than the region's median household income. Low-income households are those with incomes no greater than 50% of the region's median household income. Moderate-income households are those with incomes no greater than 80% and no less than 50% of the region's median household income. Each is adjusted for household size and is in relation to the median gross income of the housing region in which the municipality is located.

## FIRST AND SECOND ROUNDS

The First and Second Rounds under COAH are collectively referred to as the “Prior Round.” The Prior Round obligation is the cumulative 1987-1999 fair share obligation. The First Round consists of the six-year period between 1987 and 1993 for which COAH first established a formula for determining municipal affordable housing obligations (N.J.A.C. 5:92-1 *et seq.*). Then in 1994, COAH established amended regulations (N.J.A.C. 5:93-1.1 *et seq.*) and produced additional municipal affordable housing obligations for the years 1993 to 1999. This second round of obligations is known as the Second Round. When COAH adopted regulations for the Second Round, it made the First and Second Round obligations cumulative for both periods.

## THIRD ROUND

Housing rounds were originally established by the Fair Housing Act as six-year periods, but in 2001 the Legislature extended the rounds to 10-year periods. This should have meant that the Third Round ran from 1999 to 2009. However, COAH didn’t establish new rules for the Third Round until the end of 2004 (N.J.A.C. 5:94-1 and 95-1 *et seq.*). The Third Round time period was therefore extended to 2014. The Third Round rules established a new method for calculating a municipality’s affordable housing obligation, known as “growth share.” This method required municipalities to project future residential and non-residential development, and then derive their obligation from that growth.

After the New Jersey Appellate Court invalidated several components of the Third Round rules, COAH released revised rules in 2008. The Third Round was once again extended to 2018 to provide municipalities with the time to apply the amended rules and establish mechanisms to meet their obligations. The revised Third Round rules, like the initial Third Round rules, established the obligations based on a growth share approach.

On October 8, 2010, in response to numerous legal challenges to the second iteration of COAH’s Third Round regulations, the Appellate Divisions ruled that COAH could not allocate obligations through a “growth share” formula and directed COAH to use similar methods to those used in the First and Second Rounds. COAH proposed Third Round regulations a third time in 2014 using a formula similar to the ones it had used in the First and Second Rounds. However, when COAH met to consider adopting these rules on October 20, 2014, it deadlocked.

On March 10, 2015, the New Jersey Supreme Court decided In re Adoption of N.J.A.C. 5:96 & 5:97 by the N.J. Council on Affordable Housing, 221 N.J. 1 (2015) (Mount Laurel IV), wherein it responded to COAH’s failure to adopt defensible rules for the Third Round. This decision changed the landscape by which municipalities are required to comply with their constitutional obligation to provide their fair share of affordable housing. The Supreme Court held that since COAH was no longer functioning, trial courts were to resume their role as the forum of first instance for evaluating municipal compliance with Mount Laurel



obligations, and also established a transitional process for municipalities to seek temporary immunity and ultimately a Judgment of Compliance and Repose (“JOR”) from a Court, which was the “judicial equivalent” of Substantive Certification from COAH.

On January 18, 2017, the Supreme Court decided In Re Declaratory Judgment Actions Filed by Various Municipalities, County of Ocean, Pursuant To The Supreme Court’s Decision In In re Adoption of N.J.A.C. 5:96, 221 N.J. 1 (2015) (“Mount Laurel V”), which held that need having accrued during the Gap Period (1999-2015) was part of the Present Need rather than the Prospective Need. The Supreme Court held that there is an obligation with respect to households that came into existence during that gap that are eligible for affordable housing, that are presently (as of 2015) in need of affordable housing, and that are not already counted in the traditional present need.

As the methodology and obligations from the Gap and Prospective Need had not been fully adjudicated at that time, various trial judges issued opinions on the appropriate methodology and 354 municipalities reportedly settled with Fair Share Housing Center wherein they negotiated their obligations for the Third Round.

Municipal obligations were therefore broken down in Round Three Housing Element and Fair Share Plans as Present Need/Rehabilitation, Prior Round (1987-1999), and Third Round and Gap Period (1999-2015). Municipalities that received their Final Judgement of Compliance and Repose were guaranteed immunity from builders’ remedy lawsuits through the end of the Third Round, June 30, 2025.

#### FOURTH ROUND

On March 18, 2024, the affordable housing legislation known jointly as Senate Bill S50 and Assembly Bill A4 passed both houses of the legislature. Governor Murphy signed the bill (P.L.2024, c.2) into law on March 20, 2024, establishing a new methodology for determining municipalities’ affordable housing obligations for the Fourth Round and beyond. The new legislation, which comprehensively amends the FHA, overhauled the process that municipalities undertake to establish and plan for their constitutionally mandated affordable housing obligation. Most notably, this legislation formally abolished COAH while transferring its functions to the New Jersey Department of Community Affairs (DCA) and Housing Mortgage and Finance Agency (HMFA). As a result, the legislation codified the method for calculating regional and municipal affordable housing needs and returned most of the process from the Courts to state administrative departments.

The amended FHA called on the DCA to issue a non-binding report on the new Present Need Obligation (commonly referred to as the rehab obligation) and the Prospective Need for the Fourth Round (2025-2035) and subsequent rounds. The amended FHA requires the DCA to base its analysis of the obligations for each municipality based upon the standards set forth in the amended FHA. Accordingly, on October 18, 2024 the DCA released a report outlining the Fourth Round Fair Share methodology and its calculations of low- and

moderate-income obligations for each of the State's municipalities. The amended FHA gave municipalities until January 31, 2025 to review the obligation reported by the DCA and perform their own analysis of their obligation based on the methodology in the legislation and previously established by the Courts.

If any municipality wished to commit to an obligation different from the one reported by the DCA, the amended FHA required the municipality to adopt a resolution by January 31, 2025, committing to the number that it contended was the appropriate obligation. If a municipality wished to commit to the numbers that the DCA reported, the amended FHA required the municipality to adopt a resolution committing to the DCA numbers.

The amended FHA required any municipality that wished to participate in the new process that the Act created to file a declaratory relief action within 48 hours of adopting the resolution committing to the numbers the municipality deemed appropriate. Further, the amended FHA gave any interested party who wished to oppose the numbers to which any municipality committed until February 28, 2025 to file an Answer, which included a particularized objection to the numbers to which the municipality committed.

As established in the amended FHA, the "Affordable Housing Dispute Resolution Program" ("the Program") was given until March 31, 2025 to try to resolve any disputes over the fair share numbers to which a municipality committed. The program is a new entity created by the amended FHA. It is staffed with seven current or retired judges who have the authority to use adjudicators to assist in mediating disputes over the obligations of municipalities.

The amended FHA gives municipalities until June 30, 2025, to file a Housing Element and Fair Share Plan and related documents showing how the municipality will comply with its obligations. The Fourth Round Plans will follow the same general format as plans from previous rounds, with certain updates to their requirements dealing with various types of housing and the bonus credit calculation system. Notably, HEFSPs are required to be consistent with the State Development and Redevelopment Plan (SDRP) (a new draft SDRP was released in late 2024 and has yet to be adopted) and the Highlands Regional Master Plan for conforming municipalities. As part of the HEFSP, municipalities shall include an assessment of the degree to which the municipality has met its fair share obligation from the prior rounds of affordable housing (i.e. First, Second, and Third Rounds).

### **CORBIN CITY'S HISTORY OF AFFORDABLE HOUSING**

In 2004, Corbin City was the subject of a builder's remedy lawsuit in which the plaintiff sought to build clustered residential senior citizen development. The City maintained that due to the environmental constraints (including Coastal Area Facility Review Act and Pinelands Regulations) it could not realistically create opportunities for the 14-unit First and Second Round obligation. The builder's remedy complaint was ultimately dismissed.

As discussed above, the City participated in the Third Round Certification process. In response to Mount Laurel IV, the City filed its complaint for a Declaratory Judgement on July 8, 2015. Because of the uncertainty in the appropriate manner by which to calculate the City's obligation at the time, the City and the Fair Share Housing Center (FSHC) agreed that a settlement was in the best interest of the City and its residents. Under the supervision of the Special Master, the City and its professionals entered into negotiations with representatives of FSHC to settle the City's Declaratory Judgement action and seek Court-approval for an accepted fair share obligation for the City. The settlement agreement was executed by the City and FSHC on November 14, 2017.

A Fairness Hearing was held on May 25, 2018 and in an Order issued by the Court, the settlement agreement with FSHC was deemed fair and reasonable, and adequately protects the interest of low- and moderate-income persons within the City's housing region. The City's Planning Board adopted a Third Round Housing Element and Fair Share Plan on August 21, 2018, and the City was subsequently granted a final Judgement of Compliance and Repose ("JOR") on August 31, 2018 (see Appendix B).

On January 27, 2025, in accordance with the standards established by the amended FHA and described above, the City adopted Resolution #38-2025. This resolution maintained the DCA-generated obligation, to establish its Fourth Round housing obligation, and thus guaranteed protection from builders' remedy suits (see Appendix C). A Court-approved order fixing the obligation numbers was filed on March 27, 2025, with an amended copy subsequently filed on May 6, 2025 (see Appendix D). Further information on this can be found in the "Fair Share Plan" section of this Plan, below.

Further, on January 29, 2025, in accordance with the standards established by the amended FHA and described above, the City filed a Complaint for Declaratory Relief pursuant to Administrative Directive #14-24 (see Appendix E). This Complaint in particular sought the entry of a declaratory judgment to have the Dispute Resolution Program and the Court:

- i. Declare that the City of Corbin has a Fourth Round Affordable Housing Present Need of zero (0) and Prospective Need of six (6);
- ii. Enter an Order reaffirming Corbin City's and its Planning Board's immunity from all exclusionary zoning litigation, including builder's remedy lawsuits, while it prepares, adopts, endorses, and files its Housing Element/Fair Share Plan; and
- iii. Grant such other and further relief as the Court deems equitable and just.

This Fourth Round HEFSP sets forth mechanisms implemented to address the Borough's affordable housing obligations and has been prepared in accordance with the Fair Housing Act as most recently amended.

**PLANNING FOR AFFORDABLE HOUSING**

Pursuant to both the FHA (N.J.S.A. 52:27D-310, et seq.) and the Municipal Land Use Law (MLUL) (N.J.S.A. 40:55D-28), municipalities in New Jersey are required to include a Housing Element in their Master Plans. The principal purpose of the housing element is to describe the specific, intended methods that a municipality plans to use in order to meet its low- and moderate-income housing needs. Further, the housing element is meant to demonstrate the existing zoning or planned zoning changes that will allow for the provision of adequate capacity to accommodate household and employment growth projections, to achieve the goal of access to affordable housing for present and future populations. The statutorily required contents of the housing element are:

- a. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low and moderate-income households and substandard housing capable of being rehabilitated;
- b. A projection of the municipality's housing stock, including the probable future construction of low- and moderate-income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;
- d. An analysis of the existing and probable future employment characteristics of the municipality;
- e. A determination of the municipality's present and prospective fair share for low- and moderate-income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low- and moderate-income housing, as established pursuant to section 3 of P.L.2024, c.2 (C.52:27D-304.1);
- f. A consideration of the lands that are most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low- and moderate-income housing, including a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing;
- g. An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.52:27D-329.20);
- h. For a municipality located within the jurisdiction of the Highlands Water Protection and Planning Council, established pursuant to section 4 of P.L.2004, c.120 (C.13:20-4), an analysis of compliance

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of the housing element with the Highlands Regional Master Plan of lands in the Highlands Preservation Area, and lands in the Highlands Planning Area for Highlands conforming municipalities. This analysis shall include consideration of the municipality's most recent Highlands Municipal Build Out Report, consideration of opportunities for redevelopment of existing developed lands into inclusionary or 100 percent affordable housing, or both, and opportunities for 100 percent affordable housing in both the Highlands Planning Area and Highlands Preservation Area that are consistent with the Highlands regional master plan; and

- i. An analysis of consistency with the State Development and Redevelopment Plan, including water, wastewater, stormwater, and multi-modal transportation based on guidance and technical assistance from the State Planning Commission.

## PART 1: HOUSING ELEMENT

### DEMOGRAPHIC CHARACTERISTICS

#### Population

Table 1 below depicts the population trends that occurred in Corbin City, Atlantic County, and New Jersey in the 93-year period between 1930 and 2023. In 2023, there were 668 residents in Corbin City, which indicates an increase of 197 people (41.8%) from 2020. Corbin City's population on a whole has more than doubled (160.9%) from 256 to 668 during this time, which can primarily be attributed to a few periods of significant quick growth as compared to a longer pattern of steady, slow growth.

Most notably, the City saw considerable population growth throughout the: 1950s and 1960s (collective 22% increase); 1980s, 1990s, and early 2000s (collective 80.9% increase); and between 2020 and 2023 (41.8% increase). The City had also experienced a few periods of minor decline, including in the 1930s (-14.1%), 1960s and 1970s (-6.3% collectively), and in the 2010s (-4.3%).

Overall trends at the County and State level reflect a slower, more stable pattern of population growth, with a significant increase in population occurring between the 1950s and 1970s. Growth occurring over this 93-year period at the County (120.5%) and State (129.3%) levels slightly underperformed growth at the City level.

Table 1: Population Trends, 1930-2023 Corbin City, Atlantic County, and New Jersey									
Year	Corbin City			Atlantic County			New Jersey		
	Population	Change		Population	Change		Population	Change	
		Number	Percent		Number	Percent		Number	Percent
1930	256	-	-	124,823	-	-	4,041,334	-	-
1940	220	-36	-14.1%	124,066	-757	-0.6%	4,160,165	118,831	2.9%
1950	238	18	8.2%	132,399	8,333	6.7%	4,835,329	675,164	16.2%
1960	271	33	13.9%	160,880	28,481	21.5%	6,066,782	1,231,453	25.5%
1970	258	-13	-4.8%	175,043	14,163	8.8%	7,171,112	1,104,330	18.2%
1980	254	-4	-1.6%	194,119	19,076	10.9%	7,365,011	193,899	2.7%
1990	412	158	62.2%	224,327	30,208	15.6%	7,730,188	365,177	5.0%
2000	468	56	13.6%	252,552	28,225	12.6%	8,414,350	684,162	8.9%
2010	492	24	5.1%	274,549	21,997	8.7%	8,791,894	377,544	4.5%
2020	471	-21	-4.3%	274,534	-15	0.0%	9,288,994	497,100	5.7%
2023	668	197	41.8%	275,213	679	0.2%	9,267,014	-21,980	-0.2%
Total Change	-	412	160.9%	-	150,390	120.5%	-	5,225,680	129.3%

Source: 1930-2020 U.S. Decennial Census; 2023 ACS 5-Year Estimates, Table S0101

#### Population Composition by Age

The median age of the residents in Corbin City in 2020 was 46.6 years, which shows a 19.2% increase from the 2010 median age of 39.1 years. Analysis of age group characteristics provides insight into the actual

changes in population. This comparison is helpful in determining the impacts these changes have on housing needs, community facilities and services for the municipality. As detailed in Table 2 below, the overall composition of Corbin City experienced notable shifts in the years between 2010 and 2020. With the exception of the 45 to 54 and the 65 and over age groups, all age groups in the City experienced a decrease in this ten year period. On a broad level, the population of children and young adults decreased while the senior population increased.

<b>Table 2: Population by Age, 2010 to 2020</b>						
<b>Corbin City</b>						
<b>Population</b>	<b>2010</b>		<b>2020</b>		<b>Change (2010 to 2020)</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
Under 5 years	35	7.1%	16	3.4%	-19	-54.3%
5 to 14	60	12.2%	53	11.3%	-7	-11.7%
15 to 24	64	13.0%	50	10.6%	-14	-21.9%
25 to 34	59	12.0%	57	12.1%	-2	-3.4%
35 to 44	68	13.8%	52	11.0%	-16	-23.5%
45 to 54	68	13.8%	74	15.7%	6	8.8%
55 to 64	78	15.9%	76	16.1%	-2	-2.6%
65 and over	60	12.2%	93	19.7%	33	55.0%
<b>Total population</b>	<b>492</b>	<b>100.00%</b>	<b>471</b>	<b>100.00%</b>	<b>-21</b>	<b>-4.3%</b>
<b>Median Age</b>	<b>39.1</b>	<b>-</b>	<b>46.6</b>	<b>-</b>	<b>7.5</b>	<b>19.2%</b>

Source: 2010 and 2020 U.S. Decennial Census

Atlantic County experienced population fluctuation as well. The County also saw the greatest increase in its population aged 55 and over, which was slightly higher than the increase experienced at the City level. The County also experienced rather significant decreases in its population aged 24 and below as well as those aged 35 to 54. This data suggests that the trends experienced at the City level were mostly aligned with those at the County level during this time. This data is displayed in Table 3 below.

<b>Table 3: Population by Age, 2010 to 2020</b>						
<b>Atlantic County</b>						
<b>Population</b>	<b>2010</b>		<b>2020</b>		<b>Change (2010 to 2020)</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
Under 5 years	16,484	6.0%	13,397	4.9%	-3,087	-18.7%
5 to 14	35,388	12.9%	32,641	11.9%	-2,747	-7.8%
15 to 24	37,505	13.7%	35,599	13.0%	-1,906	-5.1%
25 to 34	31,243	11.4%	32,181	11.7%	938	3.0%
35 to 44	36,306	13.2%	30,836	11.2%	-5,470	-15.1%
45 to 54	44,620	16.3%	35,337	12.9%	-9,283	-20.8%
55 to 64	34,101	12.4%	42,568	15.5%	8,467	24.8%
65 and over	38,902	14.2%	51,975	18.9%	13,073	33.6%
<b>Total population</b>	<b>274,549</b>	<b>100.0%</b>	<b>274,534</b>	<b>100.0%</b>	<b>-15</b>	<b>0.0%</b>
<b>Median Age</b>	<b>39.9</b>	<b>-</b>	<b>42.5</b>	<b>-</b>	<b>2.6</b>	<b>6.5%</b>

Source: U.S. Decennial Census, 2010 and 2020

## Households

A household is defined as one or more persons, either related or not, living together in a housing unit. In 2020 there was a total of 187 households in Corbin City. Roughly half (51.9%) of the City's households comprised two or less people. In fact, Two-person households were the most common household size at both the City (33.7%) and County (31.6%) levels. The second most common household size in the City was 4-person households (19.3%), followed closely by 1-person households (18.2%), and 3-person households (17.6%). The average household size of the City in 2023 was 2.9, which was higher than the County's average of 2.42.

<b>Table 4: Household Size of Occupied Housing Units, 2020 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
1-person household	34	18.2%	30,945	29.0%
2-person household	63	33.7%	33,761	31.6%
3-person household	33	17.6%	16,943	15.9%
4-person household	36	19.3%	13,910	13.0%
5-person household	12	6.4%	6,518	6.1%
6-person household	6	3.2%	2,830	2.7%
7-or-more-person household	3	1.6%	1,809	1.7%
<b>Total Households</b>	187	100.0%	106,716	100.0%
<b>Average Household Size (2023)</b>	<b>2.9</b>		<b>2.42</b>	

Source: U.S. Decennial Census 2020, H9; 2023 ACS 5-Year Estimates, Table S1101

According to the United States Census, family households are defined as two or more persons living in the same household, related by birth, marriage, or adoption. As shown in Table 5, a majority (85%) of all households in Corbin City in 2023 were categorized as family households, with approximately half (52%) of the City's family households considered as married-couple families with or without children.

In providing more detail on American households, the 2020 Census includes the sub-groups of non-traditional households, including "Other Family" and "Non-Family" households. "Non-Family" households are defined as those that consist of a householder living alone or sharing the home exclusively with people to whom he/she is not related. Only 13% of married couple families in the City had children, which aligns with the overall population by age trends exhibited in Table 2 above.

In 2023, "Other Family" households accounted for 33% of all households in the City, broken down into 28% female householders with no spouse or partner present and 6% male householders with no spouse or partner present. Approximately 15% of the City's households in 2023 were nonfamily households, with female householders living alone (10% of total households) and male householders living alone (3% of total households) collectively accounting for the majority of nonfamily households. It is worth noting that the City has a significantly higher rate of females living alone as compared to males living alone. This could



potentially be explained, at least in part, by the facts that (1) the City's population skews toward the 65 and over age range and (2) women on average tend to live longer than men. It is possible that this subset of the City's population could account for older segments of the population who have lost a partner.

<b>Table 5: Household Size and Type, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent of Total Households</b>
<b>Total Households</b>	<b>230</b>	<b>100%</b>
<b>Family Households</b>	<b>196</b>	<b>85%</b>
Married Couple Family	119	52%
With Children	29	13%
Without Children	90	39%
Other Family	77	33%
Male Householder, No Spouse	13	6%
With Children	6	3%
Without Children	7	3%
Female Householder, No Spouse	64	28%
With Children	48	21%
Without Children	16	7%
<b>Nonfamily Household</b>	<b>34</b>	<b>15%</b>
Male Householder	8	3%
Living Alone	8	3%
Not Living Alone	0	0%
With Children	0	0%
Female Householder	26	11%
Living Alone	22	10%
Not Living Alone	4	2%
With Children	0	0%

Source: 2023 ACS 5-Year B110005 and B11010

### Income

As measured in 2023, Corbin City's median household income of \$88,839 was approximately \$12,211 lower than that of the State and approximately \$11,786 higher than that of the County. The per capita income in Corbin City, however, was lower than both the County and the State. This data is outlined in Table 6 below.

<b>Table 6: Per Capita and Household Income, 2023 Corbin City, Atlantic County, and New Jersey</b>		
	<b>Per Capita Income</b>	<b>Median Household Income</b>
<b>Corbin City</b>	\$34,789	\$88,839
<b>Atlantic County</b>	\$41,989	\$77,053
<b>New Jersey</b>	\$53,118	\$101,050

Source: 2023 ACS 5-Year Estimates, Tables S1901 and S1902

In 2023, nearly half (43.1%) of all households in the City earned an income between \$75,000 to \$149,000, as compared to roughly 31.5% of households in the County. The income range that accounted for the most City households was the \$75,000 to \$99,999 income bracket, which comprised just under one-quarter (22.2%) of households in Corbin City. At the County level, this same income bracket accounted for a lesser 13.2% of households, although the County also had a higher percentage of households earning \$200,000 or more as compared to the City. Overall, the City has a smaller concentration of households earnings less than \$35,000 than the County, and the data suggests that the City population as a whole skews slightly towards higher income ranges.

<b>Table 7: Household Income, 2023 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
Less than \$10,000	2	0.9%	5,891	5.3%
\$10,000 to \$14,999	1	0.4%	4,113	3.7%
\$15,000 to \$24,999	7	3.0%	6,003	5.4%
\$25,000 to \$34,999	15	6.5%	8,337	7.5%
\$35,000 to \$49,999	27	11.7%	9,893	8.9%
\$50,000 to \$74,999	35	15.2%	19,786	17.8%
\$75,000 to \$99,999	51	22.2%	14,673	13.2%
\$100,000 to \$149,999	48	20.9%	20,342	18.3%
\$150,000 to \$199,999	30	13.0%	10,338	9.3%
\$200,000 or more	14	6.1%	11,672	10.5%
<b>Total Households</b>	<b>230</b>	<b>100.0%</b>	<b>111,158</b>	<b>100.0%</b>
<b>Median Household Income</b>	<b>\$88,839</b>		<b>\$77,053</b>	

Source: 2023 ACS 5-Year Estimates, Table S1901

**Poverty Status**

Of the 668 people in Corbin City for which poverty status was determined, 97 (14.5%) individuals lived in poverty in 2023; this was slightly higher than the County's poverty rate of 11.7%. Of Corbin City's population that fell below the poverty level in 2023, nearly two-thirds (60.8%) were below the age of 18. At the County level this age group represented only 25.6% of the impoverished population, although the County had a much greater percentage of persons aged 18 to 64 (59.1%) and 65 and over (15.3%) living in poverty as compared to the City (37.1% and 2.1%, respectively). This data is presented in Table 8 below.

<b>Table 8: Poverty Status, 2023 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Total persons</b>	<b>668</b>	<b>100.0%</b>	<b>269,309</b>	<b>100.0%</b>
Total persons below poverty level	97	14.5%	31,637	11.7%
Under 18	59	8.8%	8,110	3.0%
18 to 64	36	5.4%	18,694	6.9%
65 and over	2	0.3%	4,833	1.8%

Source: 2023 ACS 5-Year Estimates, Table S1701

**Household Costs**

Tables 9 and 10 below outline the expenditures for housing as a percentage of household income for those who own and rent in Corbin City and Atlantic County. In 2023, a majority (87.8%) of the City's households lived in homes they owned, which was higher than that of the County level (67.4%). General affordability standards set a limit at 30% of gross income to be allocated for owner-occupied housing costs and 28% of gross income to be allocated for renter-occupied housing costs.

Approximately 17.3% of City households that owned the units they occupied spent 30% or more of their household income on housing, as compared to 71.4% of City households that rented the units they occupied. It is worth noting that the entirety of households renting at a cost exceeding the 30% threshold incurred monthly housing costs that were 50% or more of their income. At the County level, a slightly lesser 27.5% of households occupying units they owned spent 30% or more of their income on housing costs, and a lesser 52.3% of households occupying rental units spent 30% or more of the household income on housing.

This data reveals that a significantly higher percentage of renters within Corbin City exceed the 30% threshold as compared to the County. It is worth noting that this does not necessarily imply that Corbin City's rental market is less affordable than that of the County's; rather, in this case, it is an indicator that a number of the City's renters do not have access to rental units that are proportionally priced to their income level.

<b>Table 9: Selected Monthly Owner Costs as a Percentage of Household Income, 2023 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Total Owner-Occupied Housing Units</b>	<b>202</b>	<b>100.0%</b>	<b>74,940</b>	<b>100.0%</b>
Less than 20.0%	145	71.8%	34,801	46.4%
20.0 to 24.9%	10	5.0%	10,205	13.6%
25.0 to 29.9%	11	5.4%	8,297	11.1%
30.0 to 34.9%	5	2.5%	3,650	4.9%
35.0% or more	30	14.9%	16,931	22.6%
Not computed	1	0.5%	1,056	1.4%

Source: 2023 ACS 5-Year Estimates, Table DP04

<b>Table 10: Gross Rent as a Percentage of Household Income, 2023 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Total Renter-Occupied Housing Units</b>	<b>28</b>	<b>100.00%</b>	<b>36,218</b>	<b>100.00%</b>
Less than 10.0%	0	0.0%	935	2.6%
10.0 to 14.9%	0	0.0%	3,412	9.4%
15.0 to 19.9%	0	0.0%	4,238	11.7%
20.0 to 24.9%	0	0.0%	3,783	10.4%
25.0 to 29.9%	5	17.9%	4,897	13.5%
30.0 to 34.9%	0	0.0%	3,552	9.8%
35.0 to 39.9%	0	0.0%	882	2.4%
40.0 to 49.9%	0	0.0%	2,277	6.3%
50.0% or more	20	71.4%	9,816	27.1%
Not computed	3	10.7%	2,426	6.7%

Source: 2023 ACS 5-Year Estimates, Table B25070

## EXISTING HOUSING CONDITIONS

### Housing Unit Data

Nearly all (92.5%) of Corbin City's housing stock consists of structures built prior to the year 2009. In 2023, Corbin City had a total of 230 occupied housing units, roughly 80.2% of which were owner-occupied and 11.1% of which were renter-occupied. The City experienced housing booms in the 20-year period between 1990 and 2009, during which almost half (46.8%) of the City's housing structures were constructed.

The 2023 American Community Survey data indicates that a relatively slower rate of residential development has occurred since 2010, although it is worth noting that this data does not reflect structures built in 2024 or 2025. The median year of construction for the housing stock in Corbin City is 1993. This data is outlined in Tables 11 and 12 below.

In 2023, Corbin City had a high occupancy rate, with very few of its housing units vacant. Of the City's 252 housing units, 91.3% were occupied and 8.7% were vacant. Over half (59.1%) of the unoccupied units were

vacant due to “seasonal, recreational, or occasional use,” and another 27.3% were attributed to “for sale.” This data is represented in Table 13 below.

<b>Table 11: Housing Data, 2023</b> <b>Corbin City</b>			
	<b>Number</b>	<b>% of Total Housing Units</b>	<b>% of Occupied Housing Units</b>
<b>Total Housing Units</b>	<b>252</b>	<b>100.00%</b>	-
Occupied Housing Units	230	91.3%	100.00%
Owner Occupied	202	80.2%	87.8%
Renter Occupied	28	11.1%	12.2%
Vacant Housing Units	22	8.7%	-

Source: 2023 ACS 5-Year Estimates, Table DP04

<b>Table 12: Year Structure Built, 2023</b> <b>Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
<b>Total Housing Units</b>	<b>252</b>	<b>100.00%</b>
Built 1939 or earlier	40	15.9%
Built 1940 to 1949	1	0.4%
Built 1950 to 1959	16	6.3%
Built 1960 to 1969	13	5.2%
Built 1970 to 1979	23	9.1%
Built 1980 to 1989	22	8.7%
Built 1990 to 1999	41	16.3%
Built 2000 to 2009	77	30.6%
Built 2010 to 2019	19	7.5%
Built 2020 or later	0	0.0%
<b>Median Year Structure Built</b>	<b>1993</b>	

Source: 2023 ACS 5-Year Estimates, Tables B25034 and B25035

<b>Table 13: Housing Occupancy, 2023</b> <b>Corbin City</b>			
	<b>Total</b>	<b>% of Total Housing Units</b>	<b>% of Vacant Housing Units</b>
Total Housing Units	252	100.00%	-
Occupied	230	91.3%	-
Vacant Housing Units	22	8.7%	100.0%
For Rent/Rented Not Occupied	0	0.0%	0.0%
For Sale Only	6	2.4%	27.3%
Sold, Not Occupied	0	0.0%	0.0%
For Seasonal, Recreational or Occasional Use	13	5.2%	59.1%
For Migrant Workers	0	0.0%	0.0%
Other Vacant	3	1.2%	13.6%

Source: 2023 ACS 5-Year Estimates, Tables DP04 and B25004

### Housing Type and Size

In 2023, single-family detached housing made up over three-quarters (77.8%) of the City's housing stock. Mobile homes were the next most common housing type, representing another 18.3% of the City's housing stock. The median number of rooms within housing structures in the City in 2023 was 5.7 rooms, with 82.9% of housing units having a minimum of 5 rooms, 16.3% of housing units having between 3 to 4 rooms, and 0.8% of housing units having 2 or less rooms.

<b>Table 14: Housing Type and Size, 2023 Corbin City</b>		
<b>Units in Structure</b>	<b>Total</b>	<b>Percent</b>
1, detached	196	77.8%
1, attached	0	0.0%
2	10	4.0%
3 or 4	0	0.0%
5 to 9	0	0.0%
10 to 19	0	0.0%
20 or more	0	0.0%
Mobile home	46	18.3%
Boat, RV, van, etc.	0	0.0%
<b>Total Housing Units</b>	252	100.00%
<b>Rooms</b>	<b>Total</b>	<b>Percent</b>
1 room	2	0.8%
2 rooms	0	0.0%
3 rooms	13	5.2%
4 rooms	28	11.1%
5 rooms	74	29.4%
6 rooms	54	21.4%
7 rooms	26	10.3%
8 rooms	5	2.0%
9 or more rooms	50	19.8%
<b>Total Housing Units</b>	252	100.00%
<b>Median number of rooms</b>	5.7	

Source: 2023 ACS 5-Year Estimates, Table DP04

### Housing Growth and Projections

In terms of residential growth, the issuance of building permits serves as one of the indicators that help to determine housing needs in a given municipality. Table 15 below illustrates the number of building permits that were issued over the 10-year period between January 2013 through December 2023, when the City issued building permits authorizing the development of 13 housing units.

The issuance of permits has been slow and consistent over this time period, with the majority of years seeing 1 to 2 permits issued. All of the permits issued during this time frame were for one- and two-family units. If this rate were to remain relatively constant over the next 10-year period, theoretically the City could expect to see an additional 13 (gross) residential units authorized through the end of 2035. It is worth

noting, however, that this projection does not account for external factors such as zoning, redevelopment, environmental constraints, and economic cycles that could limit development or cause fluctuations.

Further, throughout the same 10-year period, Corbin City issued permits authorizing the demolition of 12 units. The average demolition rate is approximately 92.3% of the abovementioned development rate (i.e., a home net increase of around 7.7%). If the demolition rate were to remain relatively constant over the next 10-year period, theoretically an additional 12 residential units could be expected to be demolished through the end of 2035, resulting in a projected net increase of 1 unit barring any external factors or limitations.

<b>Table 15: Housing Units Authorized by Building Permits, 2013-2023</b>				
<b>Corbin City</b>				
<b>Year</b>	<b>1 &amp; 2 Family</b>	<b>Multi Family</b>	<b>Mixed-Use</b>	<b>Total</b>
2013	1	0	0	1
2014	2	0	0	2
2015	2	0	0	2
2016	1	0	0	1
2017	1	0	0	1
2018	1	0	0	1
2019	1	0	0	1
2020	0	0	0	0
2021	3	0	0	3
2022	0	0	0	0
2023	1	0	0	1
<b>Total 2013-2023</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>13</b>
<b>10-Year Average</b>				<b>1.3</b>
<b>10-Year Permit Projection (2025-2035)</b>				<b>13</b>

Source: State of New Jersey Department of Community Affairs Building Permits: Yearly Summary Data

<b>Table 16: Housing Units Demolished by Building Permits, 2013-2023</b>				
<b>Corbin City</b>				
<b>Year</b>	<b>1 &amp; 2 Family</b>	<b>Multi Family</b>	<b>Mixed-Use</b>	<b>Total</b>
2013	0	0	0	0
2014	1	0	0	1
2015	2	0	0	2
2016	3	0	0	3
2017	3	0	0	3
2018	0	0	0	0
2019	1	0	0	1
2020	0	0	0	0
2021	0	0	0	0
2022	1	0	0	1
2023	1	0	0	1
<b>Total 2013-2023</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>12</b>
<b>10-Year Average</b>				<b>1.2</b>
<b>10-Year Demolition Projection (2025-2035)</b>				<b>12</b>

Source: State of New Jersey Department of Community Affairs Building Permits: Yearly Summary Data

**Housing Values and Contract Rents**

According to the American Community Survey, the majority (84.2%) of the owner-occupied housing stock in Corbin City in 2023 was valued between \$150,000 to \$499,999, as compared to a lesser 69.8% of the County's housing stock. More specifically, the City had nearly three times more homes valued between \$150,000 and \$199,999 (31.7%) as compared to the County (10.7%). The City, however, had a slightly lower percentage of homes valued below \$150,000 (10.4%) as compared to the County (13.7%).

Only 5.4% of the City's housing stock was valued over \$500,000, whereas 16.5% of the County's housing stock reflected this same value range. The City had a notably lower median home value (\$221,600) than the County (\$303,800) in 2023; this may at least in part be explained by the County's 4.1% of housing units that exceed \$1,000,000 in value whereas this comprises 0% of the City's housing stock. This data is outlined in Table 17 below.

<b>Table 17: Value for Owner-Occupied Housing Units, 2023 Corbin City and Atlantic County</b>				
	<b>Corbin City</b>		<b>Atlantic County</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Total</b>	<b>202</b>	<b>100.0%</b>	<b>74,940</b>	<b>100.0%</b>
Less than \$50,000	11	5.4%	2,682	3.6%
\$50,000 to \$99,999	3	1.5%	3,366	4.5%
\$100,000 to \$149,999	7	3.5%	4,197	5.6%
\$150,000 to \$199,999	64	31.7%	7,987	10.7%
\$200,000 to \$299,999	57	28.2%	18,624	24.9%
\$300,000 to \$499,999	49	24.3%	25,696	34.3%
\$500,000 to \$999,999	11	5.4%	9,307	12.4%
\$1,000,000 and greater	0	0.0%	3,081	4.1%
<b>Median Value</b>	<b>\$221,600</b>		<b>\$303,800</b>	

Source: 2023 ACS 5-Year Estimates, Tables B25075 and B25077

As shown on Table 18 below, it is estimated that 64.9% of owner-occupied units in the City were financed by a mortgage, contract to purchase, or similar debt in 2023, while 35.1% were not. Of the owner-occupied units tied to a mortgage, nearly all (92.4%) had just one mortgage whereas another 4.6% were tied to multiple debts. More specifically, 3.8% of units with mortgages were also tied to a home equity loan, and 0.8% tied to a second mortgage. Another 2.0% of all owner-occupied units were tied to a home equity loan without a primary mortgage.

This data was comparable at the County level; more specifically, 63.3% of such units had a primary mortgage, while 36.7% of units did not. Of those units in the County tied to a housing-related debt, 87.5% did not have any additional lines of credit associated with the unit, while 7.3% were associated with a home equity loan, 1.2% were associated with a second mortgage, and 3.8% were associated with a home equity loan without a primary mortgage.



**Table 18: Mortgage Status, 2023**  
**Corbin City and Atlantic County**

	Corbin City			Atlantic County		
	Number	% of Total Units	% of Mortgage Units	Number	% of Total Units	% of Mortgage Units
Total Owner-Occupied Units	202	100.00%	-	74,940	100.00%	-
Owner-Occupied Housing Units with a Mortgage, Contract to Purchase, or similar Debt	131	64.9%	100.00%	47,460	63.3%	100.00%
Housing Units with No Second Mortgage and No Home Equity Loan	121	59.9%	92.4%	41,547	55.4%	87.5%
Housing Units with Multiple Mortgages	6	3.0%	4.6%	4,116	5.5%	8.7%
Mortgage with Both Second mortgage and Home Equity Loan	0	0.0%	0.0%	103	0.1%	0.2%
Mortgage with Only Home Equity Loan	5	2.5%	3.8%	3,448	4.6%	7.3%
Mortgage with Only Second Mortgage	1	0.5%	0.8%	565	0.8%	1.2%
Home Equity Loan without a Primary Mortgage	4	2.0%	3.1%	1,797	2.4%	3.8%
Owner-Occupied Housing units without a Mortgage	71	35.1%	-	27,480	36.7%	-

Source: 2023 ACS 5-Year Estimates, Table B25081

As shown in Table 19 below, the median contract rent in Corbin City in 2023 was \$845 which was roughly \$274 lower than the County median rent of \$1,119. Within the City the highest percentage of renters paid between \$500 to \$999 for monthly rent (64.3%), followed by the \$1,500 to \$1,999 range (21.4%). Approximately just one-third (32.1%) of renters in the City paid \$1,500 or more for monthly rent in 2023. Interestingly, a nearly identical percentage of residents at the County level (89.5%) and City level (89.3%) paid \$1,999 or less in monthly rent, although the distribution between rent prices varied slightly between the two. More specifically, 35.4% of renters at the County level paid between \$1,000 to \$1,499 in monthly rent, followed by 25.6% of renters paying between \$500 to \$999. This data suggests that contract rent in the City is considerably cheaper than contract rent in the County as a whole. However, as discussed earlier in this Plan in relation to Table 10, this data does not provide an indication of whether the City's contract rent patterns are proportionate to the rental population's income and buying power. In the case of Corbin City, although the rent itself appears to technically be more affordable than rent at the County level, rent might not be proportionately affordable for a portion of Corbin City's renters.

**Table 19: Contract Rent, 2023**  
**Corbin City and Atlantic County**

	Corbin City		Atlantic County	
	Number	Percent	Number	Percent
<b>Total Renter-Occupied Units</b>	<b>28</b>	<b>100.0%</b>	<b>36,218</b>	<b>100.0%</b>
Less than \$500	0	0.0%	4437	12.3%
\$500 to \$999	18	64.3%	9266	25.6%
\$1,000 to \$1,499	1	3.6%	12,815	35.4%
\$1,500 to \$1,999	6	21.4%	5,914	16.3%
\$2,000 to \$2,499	0	0.0%	948	2.6%
\$2,500 to \$2,999	0	0.0%	880	2.4%
\$3,000 or More	0	0.0%	118	0.3%
No Rent Paid	3	10.7%	1,840	5.1%
<b>Median Contract Rent</b>	<b>\$845</b>		<b>\$1,119</b>	

Source: 2023 ACS 5-Year Estimates, Tables B25056 and B25058

**Housing Conditions**

Table 20 below details the conditions of the City's housing stock in 2023. Overcrowding, plumbing, and kitchen facilities are used to determine housing deficiency. In 2023, approximately one-quarter (24.8%) of the City's housing stock relied on bottled, tank, or LP gas for heating, while utility gas made up another quarter (23.5%), and other fuel made up yet another quarter (22.2%). Less than one-percent (0.4%) of the occupied housing units in the City experienced overcrowding (more than one person per room). Similarly, just 0.4% of the housing stock lacked complete kitchen facilities, lacked complete plumbing facilities, or lacked telephone service.

<b>Table 20: Housing Conditions, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
<b>House Heating Fuel-Occupied Housing Units</b>		
Total	230	100.0%
Utility Gas	54	23.5%
Bottled, Tank, or LP Gas	57	24.8%
Electricity	27	11.7%
Fuel Oil, Kerosene, etc.	33	14.3%
Coal or Coke	0	0.0%
Wood	8	3.5%
Solar Energy	0	0.0%
Other Fuel	51	22.2%
No Fuel Used	0	0.0%
<b>Occupants per Room – Occupied Housing Units</b>		
Total	230	100.0%
1.00 or Less	229	99.6%
1.01 to 1.50	1	0.4%
1.51 or More	0	0.0%
<b>Facilities – Total Units</b>		
Total	252	100.0%
Lacking Complete Plumbing Facilities	1	0.4%
Lacking Complete Kitchen Facilities	1	0.4%
<b>Telephone Service – Occupied Housing Units</b>		
Total	230	100.0%
No Service	1	0.4%

Source: 2023 ACS 5-Year Estimates, Tables DP04, B25047, and B25051

## EMPLOYMENT DATA

Tables 21, 22, and 23 below detail the changes in employment between the years 2010 and 2023 in Corbin City, Atlantic County, and New Jersey, respectively. Throughout this thirteen-year period, the City saw an overall 4.5% decrease in its unemployment rate. Although the City experienced a 6.3% spike in unemployment between 2019 and 2020 due to the COVID-19 pandemic, it has rebounded back to a lower unemployment rate in recent years. This overall trend is mirrored at both the County and State level as well. In 2023, the City's unemployment rate was 8.2%, which was 2.3% higher than the County (5.9%) and 3.8% higher than the State (4.4%).

<b>Table 21: Employment and Residential Labor Force, 2010 to 2023</b>				
<b>Corbin City</b>				
<b>Year</b>	<b>Labor Force</b>	<b>Employment</b>	<b>Unemployment</b>	<b>Unemployment Rate</b>
2010	315	275	40	12.7%
2011	323	281	43	13.2%
2012	279	245	34	12.2%
2013	266	242	24	9.0%
2014	263	238	25	9.5%
2015	251	230	21	8.4%
2016	254	235	19	7.5%
2017	257	237	20	7.8%
2018	258	242	16	6.2%
2019	264	251	13	4.9%
2020	241	214	27	11.2%
2021	255	230	25	9.8%
2022	255	242	13	5.1%
2023	267	245	22	8.2%

Source: NJ Dept. of Labor & Workforce Development Labor Force Estimates, Municipal Historical Annual Data, 2010-2023

<b>Table 22: Employment and Residential Labor Force, 2010 to 2023</b>				
<b>Atlantic County</b>				
<b>Year</b>	<b>Labor Force</b>	<b>Employment</b>	<b>Unemployment</b>	<b>Unemployment Rate</b>
2010	140,300	122,761	17,539	12.5%
2011	138,963	121,490	17,473	12.6%
2012	139,916	122,016	17,900	12.8%
2013	136,717	120,399	16,318	11.9%
2014	131,389	117,533	13,856	10.5%
2015	125,948	113,988	11,960	9.5%
2016	122,552	113,490	9,062	7.4%
2017	122,393	113,698	8,695	7.1%
2018	123,092	116,056	7,036	5.7%
2019	125,898	119,694	6,204	4.9%
2020	123,593	102,446	21,147	17.1%
2021	121,913	109,815	12,098	9.9%
2022	122,428	115,832	6,596	5.4%
2023	124,235	116,946	7,289	5.9%

Source: NJ Dept. of Labor & Workforce Development Labor Force Estimates, County Historical Annual Data, 2010-2023

<b>Table 23: Employment and Residential Labor Force, 2010 to 2023</b>				
<b>New Jersey</b>				
<b>Year</b>	<b>Labor Force</b>	<b>Employment</b>	<b>Unemployment</b>	<b>Unemployment Rate</b>
2010	4,559,778	4,118,982	440,796	9.7%
2011	4,561,786	4,134,708	427,078	9.4%
2012	4,576,286	4,147,221	429,065	9.4%
2013	4,528,019	4,147,661	380,358	8.4%
2014	4,493,894	4,191,318	302,576	6.7%
2015	4,494,606	4,237,876	256,730	5.7%
2016	4,492,821	4,271,201	221,620	4.9%
2017	4,614,953	4,406,151	208,802	4.5%
2018	4,604,787	4,420,713	184,074	4.0%
2019	4,687,390	4,525,044	162,346	3.5%
2020	4,638,386	4,200,980	437,406	9.4%
2021	4,648,814	4,337,793	311,021	6.7%
2022	4,736,213	4,552,563	183,650	3.9%
2023	4,829,671	4,615,722	213,949	4.4%

Source: NJ Dept. of Labor & Workforce Development Labor Force Estimates, State Historical Annual Data, 2010-2023

### Employment Status

It is estimated that approximately two-thirds (65.5%) of Corbin City's population over the age of 16 was in the labor force in 2023, which was on par with the County's rate of 64.9%. Of the City's labor force, 100% of workers were civilians and a vast majority (91.5%) were employed. At the County level, 98.9% of workers were civilians and 92.6% of the labor force was employed, indicating that the City and County exhibited similar trends. This data is shown in Table 24 below.

<b>Table 24: Employment, 2023</b>						
<b>Corbin City and Atlantic County</b>						
	<b>Corbin City</b>			<b>Atlantic County</b>		
	<b>Number</b>	<b>% of 16+ Population</b>	<b>% of Labor Force</b>	<b>Number</b>	<b>% of 16+ Population</b>	<b>% of Labor Force</b>
Population 16 years and over	542	100.0%	-	224,652	100.0%	-
In labor force	355	65.5%	100.0%	145,774	64.9%	100.0%
Civilian Labor Force	355	65.5%	100.0%	144,112	64.1%	98.9%
Employed	325	60.0%	91.5%	134,927	60.1%	92.6%
Unemployed	30	5.5%	8.5%	9,185	4.1%	6.3%
Armed Forces	0	0.0%	0.0%	1662	0.7%	1.1%
Not in labor force	187	34.5%	-	78,878	35.1%	-

Source: 2023 ACS 5-Year Estimates, Table DP03

**Class of Worker and Occupation**

According to the American Community Survey Estimates, the majority of workers (70.8%) living in Corbin City in 2023 were a part of the private wage and salary worker group. This group includes people who work for wages, salary, commission, and tips for a private for-profit employer. The next largest categories were local government workers (11.1%) and self-employed workers or unpaid family workers (9.2%). This data is outlined in Table 25 below.

<b>Table 25: Class of Worker, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
Employed Civilian Population 16 Years and Over	325	100.0%
Private Wage and Salary Worker	230	70.8%
Private Not-For-Profit Wage and Salary Workers	17	5.2%
Local Government Worker	36	11.1%
State Government Worker	8	2.5%
Federal Government Worker	4	1.2%
Self-Employed Worker or Unpaid Family Worker	30	9.2%

Source: 2023 ACS 5-Year Estimates, Table S2408

The occupational breakdown shown in Table 26 below includes only private wage and salary workers. Overall, the City's distribution of private wage and salary workers was pretty even throughout the five measured occupation groups. Over half of the City's residents who worked within the private wage field were concentrated in the Management, Business, Science and Arts Occupations (29.2%) and Service Occupations (23.7%) sectors. The Natural Resources, Construction and Maintenance Occupations (17.5%), and Production Transportation and Material Moving Occupations (15.1%), and Sales and Office Occupations (14.5%) sectors collectively comprised the remaining half (47.1%) of this population.

<b>Table 26: Resident Employment by Occupation, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
Employed Civilian Population 16 Years and Over	325	100.0%
Management, Business, Science and Arts Occupations	95	29.2%
Service Occupations	77	23.7%
Sales and Office Occupations	47	14.5%
Natural Resources, Construction and Maintenance Occupations	57	17.5%
Production Transportation and Material Moving Occupations	49	15.1%

Source: 2023 ACS 5-Year Estimates, Table DP03

As portrayed in Table 27, the industry that employed the greatest number of Corbin City residents in 2023 was the Educational Services, and Health Care and Social Assistance sector, which accounted for 17.2% of the City's resident workforce. This was followed rather closely by the Retail Trade (16.9%), Construction (16.9%), and Arts, Entertainment, and Recreation, and Accommodation and Food Services (16.0%) sectors.

<b>Table 27: Employment by Industry, 2023 Corbin City</b>		
<b>Industry</b>	<b>Number</b>	<b>Percent</b>
Employed Civilian Population 16 Years and Over	325	100.00%
Agriculture, Forestry, Fishing and Hunting, Mining	10	3.1%
Construction	55	16.9%
Manufacturing	24	7.4%
Wholesale Trade	0	0.0%
Retail Trade	55	16.9%
Transportation and Warehousing, and Utilities	12	3.7%
Information	0	0.0%
Finance and Insurance, and Real Estate and Rental and Leasing	6	1.8%
Professional, Scientific, and Management, and Administrative and Waste Management Services	30	9.2%
Educational Services, and Health Care and Social Assistance	56	17.2%
Arts, Entertainment, and Recreation, and Accommodation and Food Services	52	16.0%
Other Services, Except Public Administration	10	3.1%
Public Administration	15	4.6%

Source: 2023 ACS 5-Year Estimates, Table DP03

**Commuting to Work**

In 2023, it is estimated that 6.3% of the City's employed population worked from home. Of the City's employed population that did not work from home, roughly three-quarters (76.3%) commuted up to 34 minutes to their place of work. Nearly all (96.0%) of the City's workers that did not work from home commuted up to an hour, with the remaining 4.0% of workers travelling between an hour to an hour and a half to get to work. The median travel time to get to work for this subset of the population was 32.3 minutes in 2023.

The majority (91.5%) of the City's working population drove alone as their primary means of travel to work. Another 2.2% of workers carpooled, and no workers utilized public transportation, a taxicab, motorcycle, bike, or walked to work. This data is outlined in Tables 28 and 29 below.

<b>Table 28: Travel Time to Work, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
Workers who did not work at home	299	100.0%
Less than 5 minutes	0	0.0%
5 to 9 minutes	21	7.0%
10 to 14 minutes	9	3.0%
15 to 19 minutes	14	4.7%
20 to 24 minutes	47	15.7%
25 to 29 minutes	19	6.4%
30 to 34 minutes	118	39.5%
35 to 39 minutes	16	5.4%
40 to 44 minutes	3	1.0%
45 to 59 minutes	30	10.0%
60 to 89 minutes	10	3.3%
90 or more minutes	12	4.0%
<b>Mean Travel Time to Work (minutes)</b>	<b>32.3</b>	

Source: 2013 ACS 5-Year Estimates, Tables DP03 and B08303

<b>Table 29: Means of Travel to Work, 2023 Corbin City</b>		
	<b>Number</b>	<b>Percent</b>
Workers 16 years and over	319	100.0%
Car, Truck, Van - Drove Alone	292	91.5%
Car, Truck, Van - Carpooled	7	2.2%
Public Transportation	0	0.0%
Walked	0	0.0%
Taxicab, Motorcycle, Bike, or Other	0	0.0%
Worked at Home	20	6.3%

Source: 2023 ACS 5-Year Estimates, Table DP03

**Covered Employment**

There is currently very limited information available on actual job opportunities within municipalities. The Department of Labor and Workforce Development collects information on covered employment, which is employment and wage data for private employees covered by unemployment insurance. The following table provides a snapshot of private employers located within Corbin City. The first table reflects the number of jobs covered by private employment insurance from 2013 through 2023.

According to data from the New Jersey Department of Labor and Workforce Development, the highest number of covered jobs in Corbin City between 2013 and 2023 was in 2013 when 46 jobs were covered by unemployment insurance. Private employment has seen a steady decline in the City since 2013, with its largest losses occurring between 2017 and 2018 (-48.6%). Corbin City experienced a minimal gain of 3 jobs between 2018 and 2019 and between 2020 and 2021, each time representing an increase of roughly 15% to 16%.

<b>Table 30: Private Wage Covered Employment 2013 - 2023 Corbin City</b>			
<b>Year</b>	<b>Number of Jobs</b>	<b>Number Change</b>	<b>Percentage Change</b>
2013	46	-	-
2014	45	-1	-2.2%
2015	42	-3	-6.7%
2016	40	-2	-4.8%
2017	37	-3	-7.5%
2018	19	-18	-48.6%
2019	22	3	15.8%
2020	20	-2	-9.1%
2021	23	3	15.0%
2022	21	-2	-8.7%
2023	20	-1	-4.8%

Source: NJ Dept. of Labor & Workforce Development, Labor Force Estimates

**In-City Establishments and Employees by Industry: 2023**

Table 31 below depicts the average annual number of establishments and employees by industry sector that exist within the City, as reported in the Quarterly Census of Employment and Wages ("QCEW") published by the New Jersey Department of Labor and Workforce Development ("NJDLWD"). The QCEW provides a quarterly accounting of employment, establishments, and wages throughout the State of New Jersey, and accounts for over 95% of available jobs in the state. The annual municipal reports group data according to the North American Industry Classification System ("NAICS"). The QCEW considers an establishment to be a single economic unit, which is located at one physical location and engaged in one



type of economic activity. The NJDLWD specifies that establishments differ from firms or companies in the sense that the latter can have multiple establishments.

In 2023, the City had an annual average of 10 establishments employing an average of 20 persons in the private sector. In the public sector, the local government sector had an average of 1 unit employing an average of 6 people. The QCEW datasets suppress information for industries where there are only a few units or where one employer comprises the majority of the employment or wages of that industry. In the case of the QCEQ dataset for Corbin City, all the data has been suppressed.

<b>Table 31: Average Number of Establishments and Employees by Industry, 2023 Corbin City</b>			
<b>Industry ID and Description</b>		<b>2023 Average</b>	
		<b>Units</b>	<b>Employment</b>
23	Construction	-	-
31	Manufacturing	-	-
51	Information	-	-
53	Real Estate	-	-
54	Professional/Technical	-	-
72	Accommodations/Food	-	-
81	Other Services	-	-
99	Unclassifieds	-	-
<b>Private Sector Totals</b>		<b>10</b>	<b>20</b>
<b>Local Government Totals</b>		<b>1</b>	<b>6</b>

Source: NJ Dept. of Labor & Workforce Development Labor Force, Quarterly Census of Employment and Wages (QCEW), Municipal Report by Sector (NAICS Based), 2022

Data have been suppressed (-) for industries with few units or where one employer is a significant percentage of employment or wages of the industry.

### Probable Future Employment Opportunities

The South Jersey Transportation Planning Organization (SJPTO) serves the counties of Atlantic, Cape May, Cumberland, and Salem in South Jersey. Stemming from its “Forward 2050” project efforts, SJTPO maintains an interactive data dashboard that projects regional forecasts for population, households, and employment from the current year through 2060. The current report predicts that the City’s households and employment will see growth through 2050, although the overall population will decrease. It is estimated that the population will see an overall 10% decrease, while households will increase by 11.3% and employment will increase by 30%.

<b>Table 32: Population and Employment Projections, 2015 to 2050 Corbin City</b>				
<b>Category</b>	<b>2015</b>	<b>2050 (Projected)</b>	<b>Overall Projected Change</b>	
			<b>Number</b>	<b>Percent</b>
Population	492	443	-49	-10.0%
Households	186	207	21	11.3%
Employment	816	1,061	245	30.0%

Source: NJTPA Municipal Forecasts, dated 9/13/2021

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## **PART 2: FAIR SHARE PLAN**

### **INTRODUCTION**

The following Fair Share Plan ("Plan") details the City's Prior Round (1987-1999), Third Round (1999-2025), and Fourth Round (2025-2035) Prospective Need obligations, as well as its Fourth Round Present Need. As noted, Corbin City has no Present Need/Rehabilitation obligation. This Plan proposes mechanisms by which the City can realistically provide opportunities for affordable housing for those moderate-, low-, and very low- income households.

### **CURRENT STANDARDS**

The below section outlines the current standards applicable to the Borough's Fourth Round obligation, including the various categories of credits.

#### **Age-Restricted Housing**

A municipality may not satisfy more than 30% of the affordable units, exclusive of bonus credits, to address its prospective affordable housing need through the creation of age-restricted housing.

#### **Transitional Housing**

Transitional housing units, which will be affordable for persons of low- and moderate-income, were not previously categorized by the Fair Housing Act as a standalone housing type. The amended legislation includes such transitional housing units as a new category which may be included in the HEFSP and credited towards the fulfillment of a municipality's fair share obligations. This is limited to a maximum of 10% of the municipality's obligations.

#### **Veterans Housing**

Up to 50% of the affordable units in any particular project may be prioritized for low- and moderate-income veterans.

#### **Families with Children**

A minimum of 50% of a municipality's actual affordable housing units, exclusive of bonus credits, must be made available to families with children.

#### **Rental Units**

A minimum of 25% of a municipality's actual affordable housing units, exclusive of bonus credits, shall be satisfied through rental units. At least half of that number shall be available to families with children.

#### **Very-Low Income Requirement**

At least 13% of the housing units made available for occupancy by low-income and moderate-income houses shall be reserved for low-income households earning 30% or less of the median income pursuant to the Fair Share Housing Act, N.J.S.A. 52:27D-301, et seq. Half of the very low-income units will be made available to families with children.

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### Low/Moderate Income Split

At least 50% of the units addressing the City's obligation shall be affordable to very-low income and low-income households, and the remaining may be affordable to moderate-income households.

### Affordability Controls

Newly created rental units shall remain affordable to low-and moderate-income households for a period of not less than 40 years, 30 years for for-sale units, and 30 years for housing units for which affordability controls are extended for a new term of affordability, provided that the minimum extension term may be limited to no less than 20 years as long as the original and extended terms, in combination, total at least 60 years.

### Affirmative Marketing

The affordable units shall be affirmatively marketed in accordance with UHAC and applicable law, to include the community and regional organizations identified in the agreement as well as the posting of all affordable units on the New Jersey Housing Resource Center website in accordance with applicable law.

### Uniform Housing Affordability Controls (UHAC)

All affordable units created through the provisions of this Plan shall be developed in conformance with the Uniform Housing Affordability Controls (UHAC) pursuant to N.J.A.C. 5:80-26.1 et seq. as amended.

### Unit Adaptability

All new construction units shall be adaptable in conformance with P.L.2005, c.250/N.J.S.A. 52:27D-311a and -311b and all other applicable laws.

### Inclusionary Development Requirements

Pursuant to UHAC N.J.A.C. 5:80-26.5(b), in inclusionary developments, the affordable units shall be integrated with the market-rate units. The affordable units shall not be concentrated in less desirable locations, nor shall the affordable units be physically clustered so as to segregate the affordable units and market-rate units. Affordable units must be interspersed throughout the development, except that age-restricted and supportive housing units may be physically clustered if the clustering facilitates the provision of on-site medical services or on-site social services.

Construction of the affordable units in inclusionary developments shall be phased in compliance with N.J.A.C. 5:80-26(b)4. All inclusionary developments shall be subject to the most recent version of UHAC standards.

**Bonus Credits**

Bonus credits shall not exceed 25% of a municipality's prospective need obligation, nor shall a municipality receive more than one type of bonus credit for any one unit. Bonus credits may be granted on the following schedule:

Unit Type	Unit Credit	Bonus Credit
Each unit of low- or moderate-income housing for individuals with special needs or permanent supportive housing, as those terms are defined in section 2 of P.L. 2004, c.70 (C.34:1B-21.24).	1	1
Each low- or moderate-income ownership unit created in partnership sponsorship with a non-profit housing developer.	1	0.5
Each unit of low- or moderate-income housing located within a one-half mile radius, or one-mile radius for projects located in a Garden State Growth Zone, as defined in section 2 of P.L.2011, c.149 (C.34:1B-243), surrounding a New Jersey Transit Corporation, Port Authority Transit Corporation, or Port Authority Trans-Hudson Corporation rail, bus, or ferry station, including all light rail stations. <sup>1</sup>	1	0.5
A unit of age-restricted housing, provided that a bonus credit for age-restricted housing shall not be applied to more than 10 percent of the units of age-restricted housing constructed in compliance with the Uniform Housing Affordability Controls promulgated by the New Jersey Housing and Mortgage Finance Agency in a municipality that count towards the municipality's affordable housing obligation for any single 10-year round of affordable housing obligations.	1	0.5
A unit of low- or moderate-income housing constructed on land that is or was previously developed and utilized for retail, office, or commercial space.	1	0.5
Each existing low- or moderate-income rental housing unit for which affordability controls are extended for a new term of affordability, in compliance with the Uniform Housing Affordability Controls promulgated by the New Jersey Housing and Mortgage Finance Agency, and the municipality contributes funding towards the costs necessary for this preservation.	1	0.5
Each unit of low- or moderate-income housing in a 100 percent affordable housing project for which the municipality contributes toward the costs of the project. <sup>2</sup>	1	1
Each unit of very low-income housing for families above the 13 percent of units required to be reserved for very low-income housing pursuant to section 7 of P.L.2008, c.46 (C.52:27D-329.1).	1	0.5
Each unit of low- or moderate-income housing created by transforming an existing rental or ownership unit from a market rate unit to an affordable housing unit. <sup>3</sup>	1	1

<sup>1</sup> The distance from the bus, rail, or ferry station to a housing unit shall be measured from the closest point on the outer perimeter of the station, including any associated park-and-ride lot, to the closest point of the housing project property.

<sup>2</sup> This contribution may consist of: (a) real property donations that enable siting and construction of the project or (b) contributions from the municipal affordable housing trust fund in support of the project, if the contribution consists of no less than three percent of the project cost.

<sup>3</sup> A municipality may only rely on this bonus credit as part of its fair share plan and housing element if the municipality demonstrates that a commitment to follow through with this market to affordable agreement has been made and: (a) this agreement has been signed by the property owner; or (b) the municipality has obtained ownership of the property.

**CORBIN CITY AFFORDABLE HOUSING OBLIGATIONS**

The City's affordable housing obligations are as follows:

<b>Rehabilitation Share</b>	0
<b>Prior Round Obligation (1987-1999)</b>	13
<b>Third Round Obligation (1999-2025)</b>	28
<b>Fourth Round Prospective Need Obligation (2025-2035)</b>	6

**REVIEW OF PRIOR ROUND (1987-1999) AND THIRD ROUND (1999-2025) COMPLIANCE**

As part of any Housing Element and Fair Share Plan, a municipality shall include an assessment of the degree to which the municipality has met its fair share obligation from the previous rounds of affordable housing obligations as established by prior court approval or approval by COAH and determine to what extent this obligation is unfulfilled or whether the municipality has credits in excess of its previous round obligations. If a previous round obligation remains unfulfilled, or a municipality never received an approval from the court or COAH for any previous round, the municipality shall address such unfulfilled previous round obligation in its Housing Element and Fair Share Plan.

In addressing previous round obligations, the municipality shall retain any sites that, in furtherance of the previous round obligation, are the subject of a contractual agreement with a developer, or for which the developer has filed a complete application seeking subdivision or site plan approval prior to the date by which the Housing Element and Fair Share Plan are required to be submitted, and shall demonstrate how any sites that were not built in the previous rounds continue to present a realistic opportunity.

**Summary of Prior Round and Third Round Compliance**

The City had a Prior Round obligation of 13 units and a Third Round obligation of 28 units, for a total obligation of 41 units. Per the Court-approved Third Round settlement agreement and the City's Third Round JOR, Corbin City has met their Prior Round obligation through the following mechanisms:

<b>Summary of Corbin City's Prior and Third Rounds of 41</b>	
<b>Credits Without Controls</b>	
<i>Trailer and Mobile Home District</i>	7
<b>Durational Adjustment</b>	34
<b>TOTAL PRIOR AND THIRD ROUNDS</b>	<b>41</b>

**Credits Without Controls**

Corbin City has an existing Trailer and Mobile Home District, the intent of which is to "maintain the availability of affordable housing that meets COAH guidelines and recognizes existing uses, while allowing upgrading of the same" (Ordinance Section 102-8.1 of the City's Revised General Code). The Trailer and Mobile Home District is centrally located within the City and is comprised of 43 units. Per the City's Third

Round Settlement Agreement, JOR, and Housing Element and Fair Share Plan, Corbin City conducted a Credits without Controls survey of the Trailer and Mobile Home District to determine the degree to which any or all of the units within the zone meet the requirements of N.J.A.C. 5:93-3.2 and were therefore eligible for credits.

On October 9, 2018, the City Council approved Resolution #91-2018 authorizing the mailing of the credits without control survey. In a letter dated October 12, 2018, residents of Corbin City were invited to a Town Hall Meeting scheduled for October 22, 2018 for the purposes of providing information regarding the survey. A total of 15 completed surveys were received, seven of which reported an annual household income that met the 2018 affordable housing regional income limits, as determined by the Affordable Housing Professional of New Jersey, and were therefore eligible as affordable units.

#### *Durational Adjustment*

Per the City's Third Round Settlement Agreement, JOR, and Housing Element and Fair Share Plan, any Prior or Third Round Prospective Need obligation remaining after the Credits without Controls survey would be addressed through a durational adjustment. Pursuant to the executed settlement agreement with FSHC, Corbin City acknowledged that should CAFRA and/or Pinelands Act Protection regulations change and/or should the State re-designate the planning areas within Corbin City so as to create the capacity for water or sewer to support inclusionary development, that the City would reexamine its Master Plan so as to provide for the opportunity for inclusionary development. At the writing of this Plan, such conditions have not yet come to fruition and, this, the City has not developed any affordable units.

#### **FOURTH ROUND PRESENT NEED / REHABILITATION OBLIGATION**

As previously noted, the City has a Present/Rehabilitation Need of 0 units for the Fourth Round.

#### **FOURTH ROUND PROSPECTIVE NEED OBLIGATION (2025-2035)**

On October 20, 2024, the New Jersey Department of Community Affairs ("DCA") released a report outlining the Fourth Round (2025-2035) Fair Share methodology and its calculations of low- and moderate-income obligations for each of the State's municipalities. The obligations were calculated in alignment with the formulas and criteria found in P.L.2024, c.2. On January 27, 2025, the City adopted Resolution #38-2025, accepting their Fourth Round DCA calculated Rehabilitation Obligation of 0 units and the Prospective Need obligation of 6 units. The City subsequently received a Court Order dated March 27, 2025 regarding Docket No. ATL-L-194-25; this Order served to "fix" Corbin City's accepted Fourth Round Present Need of 0 and Prospective Need of 6 and authorized the City to prepare a Fourth Round HEFSP (see Appendix D).

As outlined below, the City proposes to meet its Fourth Round obligation through the following mechanism:

### Durational Adjustment

The City of Corbin is seeking a durational adjustment for their entire Fourth Round obligation based upon the lack of adequate sewage capacity and sewer infrastructure within the City. Pursuant to N.J.S.A. 52:27D-307(c)(2) a municipality can seek a durational adjustment based on a lack of infrastructure. The adjustment allows the municipality to defer its low and moderate-income housing obligation until the infrastructure required to develop additional housing is implemented. Corbin City lacks any sewage capacity and sewage infrastructure.

Additionally, 64 acres of the City is located within the Pinelands Protection Area, regulated by the Pinelands Comprehensive Management Plan (CMP) and is designated as Forest Area. The remainder of Corbin City's land is within the Pinelands National Reserve, located outside of the state designated Pinelands Area. This portion of the City is regulated by the Coastal Area Facility Review Act (CAFRA), and 5 square miles is within the Lester G. MacNamara Wildlife Management Area. The Tuckahoe River, a designated Wild and Scenic River, as well as a C-1 state regulated water, runs along the border of Corbin City. Because of the severe development restrictions placed upon the City, Corbin City falls within Planning Areas 4 (Rural Planning Area) and 5 (Environmentally Sensitive Planning Area) under the State of New Jersey Planning Map.

Based on the complete lack of sewage capacity and infrastructure within the City, the City's location within the jurisdiction of the Coastal Areas and Facilities Review Act (CAFRA), and the City's location within the Pinelands Forest Management Area, it is not realistic to anticipate that any site within Corbin City will receive adequate water and/or sewer infrastructure by June 30, 2035.

### Fourth Round Summary

Summary of Corbin City's Fourth Round of 6	
<b>Durational Adjustment</b>	6
<b><i>TOTAL FOURTH ROUND</i></b>	<b>6</b>

## **CONSISTENCY WITH STATE PLANNING REQUIREMENTS**

### State Plan

In accordance with the amended Fair Housing Act, Housing Elements and Fair Share Plans shall provide an analysis of consistency with the State Development and Redevelopment Plan (SDRP), including water, wastewater, stormwater, and multi-modal transportation based on guidance and technical assistance from the State Planning Commission.

New Jersey adopted its last SDPR in 2001. A draft amendment to the SDRP was prepared in 2011 but was ultimately never adopted. The Office of Planning Advocacy released a new draft SDRP on December 4, 2024. The State is currently undergoing the cross acceptance process in relation to the draft SDRP.

The 2024 draft SDRP outlines the following overarching goals:

- 
- **Economic:** Promote economic growth that benefits all residents of New Jersey.
  - **Housing:** Provide an adequate supply of housing for residents of all ages and incomes in communities of their choosing that meet their needs and offer ready access to the full range of supportive goods and services.
  - **Infrastructure:** Economic opportunity through nation leading infrastructure.
  - **Revitalization and Recentering:** Revitalize and recenter the State's underutilized developed areas.
  - **Climate Change:** Effectively address the adverse impacts of global climate change.
  - **Natural and Water Resources:** Protect, maintain, and restore the State's natural and water resources and ecosystems.
  - **Pollution and Environmental Clean-Up:** Protect the environment and prevent and clean up pollution.
  - **Historic and Scenic Resources:** Protect, enhance, and improve access to areas with exceptional archaeological, historic, cultural, scenic, open space, and recreational value.
  - **Equity:** Implement equitable planning practices to promote thriving communities for all New Jerseyans.
  - **Comprehensive Planning:** Foster sound and integrated planning and implementation at all level Statewide.

This Plan broadly aligns with the goals of the draft SDRP, specifically in the sense that utilizing a durational adjustment is intended to protect the natural and water resources and environment both within and surrounding Corbin City. Further, due to the severe development restrictions placed upon the City, the use of a durational adjustment in Corbin City reflects sound planning practice.

At a more minute level, this Plan also aligns closely with the SDRP goals set forth for the Rural Planning Area (PA4) and Environmentally Sensitive Planning Area (PA5), in which the entirety of the City is located. More specifically, this Plan advances the following goals:

- Enhance habitats and sensitive lands.
- Protect environmental resources.
- Protect both large and small contiguous areas of land.
- Promote restoring habitats and biodiversity.
- Accommodate growth only in Centers.
- Confine programmed sewers and public water services to Centers, except where public health is at stake.
- Protect, enhance, and diversify the existing character of stable communities.



**Multigenerational Family Housing Continuity Commission**

An amendment to the Fair Housing Act requires “an analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.52:27D-329.20).” As of the date of this Housing Plan, there have been no recommendations by the Multigenerational Family Housing Continuity Commission for which to provide an analysis.

**SUMMARY OF FAIR SHARE COMPLIANCE**

<b>Summary of Corbin City's Obligation</b>				
	<b>Total</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>
<b>Prior and Third Round Obligations</b>	<b>41</b>	-	-	-
Credits Without Controls Survey	7	2	3	2
Durational Adjustment	34	-	-	-
<b><i>TOTAL PRIOR ROUND</i></b>	<b>41</b>	<b>2</b>	<b>3</b>	<b>2</b>
<b>Fourth Round Obligation</b>	<b>6</b>			
Durational Adjustment	6			
<b><i>TOTAL FOURTH ROUND</i></b>	<b>6</b>	-	-	-

# **Appendix A**

## **Corbin City Third Round Settlement Agreement with Fair Share Housing Center**



Peter J. O'Connor, Esq.  
 Kevin D. Walsh, Esq.  
 Adam M. Gordon, Esq.  
 Laura Smith-Denker, Esq.  
 David T. Rammner, Esq.  
 Joshua D. Bauers, Esq.

November 14, 2017

Robert P. Merenich, Esq.  
 Gemmel, Todd and Merenich, PA  
 PO Box 296, 767 Shore Rd.  
 Linwood, New Jersey 08221

**Re: In the Matter of the City of Corbin City, County of Atlantic,**  
 Docket No. ATL-L-1533-15

Dear Mr. Merenich:

This letter memorializes the terms of an agreement reached between the City of Corbin City ("Corbin City"), the declaratory judgment plaintiff, and Fair Share Housing Center (FSHC), a Supreme Court-designated interested party in this matter in accordance with In re N.J.A.C. 5:96 and 5:97, 221 N.J. 1, 30 (2015)(Mount Laurel IV) and, through this settlement, a defendant in this proceeding.

### **Background**

Corbin City filed the above-captioned matter on July 8, 2015 seeking a declaration of its compliance with the Mount Laurel doctrine and Fair Housing Act of 1985, N.J.S.A. 52:27D-301 et seq. in accordance with In re N.J.A.C. 5:96 and 5:97, *supra*. FSHC and Corbin City have appeared before the Court for case management conferences since the inception of this matter and have also met with Court's Master, Judge Perskie, JSC (Ret.) in an effort to resolve this matter. Through that process, Corbin City and FSHC agreed to settle the litigation and to present that settlement to the trial court with jurisdiction over this matter to review, recognizing that the settlement of Mount Laurel litigation is favored because it avoids delays and the expense of trial and results more quickly in the construction of homes for lower-income households.

### **Settlement terms**

The Township/Borough and FSHC hereby agree to the following terms:

FSHC agrees that the Township/Borough, through the adoption of a Housing Element and Fair Share Plan consistent with the terms of this agreement, and through the implementation of the Plan and this agreement, satisfies its obligations under the Mount Laurel doctrine and Fair Housing Act of 1985, N.J.S.A. 52:27D-301 et seq., for the Prior Round (1987-1999) and Third Round (1999-2025).

FSHC and Corbin City agree that, at the present time, the Coastal Area and Facilities

Review Act and its implementing regulations, the Pinelands Protection Act and its implementing regulations, the State's ownership of 3462.4 acres of Corbin City's 4998.4 acres, and the total lack of public sewer in Corbin City, constitute adequate grounds for a durational adjustment pursuant to N.J.A.C. 5:93-4.3, and that it is not realistic to anticipate that any site in Corbin City will receive adequate water and/or sewer infrastructure during the period through July 1, 2025 and thus there is no requirement to zone any site for inclusionary development pursuant to N.J.A.C. 5:93-4.3(a) or (b).

FSHC further acknowledges that, beginning in the 1960's, Corbin City has set aside a Trailer and Mobile Home District that exists in the middle of the municipality and is delineated by the intersections of Godfrey and Washington Lanes with Samson and Sunset Roads. There are forty-three (43) units within this District. To the degree that some or all of those units meet the requirements of N.J.A.C. 5:93-3.2 ("credits without controls") those units shall be eligible for crediting as described further later in this Agreement.

2. At this time and at this particular point in the process resulting from the Supreme Court's Mount Laurel IV decision, when fair share obligations have yet to be definitively determined, it is appropriate for the parties to arrive at a settlement regarding a municipality's Third Round present and prospective need instead of doing so through plenary adjudication of the present and prospective need.
3. FSHC and Corbin City hereby agree that Corbin City's total affordable housing obligation is forty-three (43) units i.e. the sum of Rehabilitation Share (2), Prior Round (13), and Third Round Gap and Prospective Need (28).<sup>1</sup>
4. As discussed in paragraph one (1) above, environmental regulations and conditions, currently and as may be realistically foreseen through June 30, 2025, have rendered Corbin City's zoning to meet its Prior Round Obligations, present need and Third Round obligations not realistically possible.

As to rehabilitation share, in conformance with the recommendations of prior Master Plan re-examinations, since 1995, at least ten (10) housing units (there may be more) were rehabilitated via community block grants and loans from 1992 through 2005 and two additional units from 2005 to 2015 in conjunction with the Atlantic County Improvement Authority. Corbin City will continue to participate in the Atlantic County Improvement Authority program to address its two unit rehabilitation obligation.

As to Prior Round and Third Round obligations, Corbin City further agrees to conduct a Credit without Controls survey within one hundred and twenty (120) days after the entry of a judgment approving this settlement agreement to identify housing units which may

---

<sup>1</sup> David N. Kinsey, PhD, PP, FAICP, NEW JERSEY LOW AND MODERATE INCOME HOUSING OBLIGATIONS FOR 1999-2025 CALCULATED USING THE NJ COAH PRIOR ROUND (1987-1999) METHODOLOGY, May 2016, and Gap Present Need, April 2017, with an agreed upon settlement reduction as to the Gap Present Need/Prospective Need.

be credited towards its cumulative affordable housing obligations.

5. Corbin City will address its remaining obligation through a durational adjustment:
  - a. As demonstrated by the foregoing facts, Corbin City does not have any capacity for water or sewer to support inclusionary development and thus is entitled to a durational adjustment in accordance with N.J.A.C. 5:93-4.3:
  - b. The municipality agrees to comply with N.J.A.C. 5:93-4.3 as follows:

Corbin City will seek court approval for, and FSHC will support, a durational adjustment of all those units remaining after Corbin City is afforded credits for Rehabilitation and Credits without Controls as set forth earlier in this Agreement. In accordance with N.J.A.C. 5:93-4.3(c), the requirement to address the entire remaining Prior and Third Round prospective need obligation shall be deferred until adequate water and/or sewer are made available.
  - c. Corbin City acknowledges that should CAFRA and/or Pinelands Act Protection regulations change and/or should the State re-designate the planning areas within Corbin City so as to create the capacity for water or sewer to support inclusionary development, that it shall re-examine its Master Plan within sixty (60) days of the effective date of any such regulatory so as to provide for the opportunity for inclusionary development. At that point, to the extent that any new affordable units are created within the Township, all such units shall include the required bedroom distribution, be governed by controls on affordability and affirmatively marketed in conformance with the Uniform Housing Affordability Controls, N.J.A.C. 5:80-26.1 et. seq. or any successor regulation, with the exception that in lieu of 10 percent of affordable units in rental projects being required to be at 35 percent of median income, 13 percent of affordable units in such projects shall be required to be at 30 percent of median income, and all other applicable law.
6. As an essential term of this Agreement, within one hundred and eighty (180) days of Court's approval of this Agreement, Corbin City shall complete the Credits without Controls study referenced above and submit that study for confirmation to the Honorable Stephen Perksie, J.S.C. (now retired), the court-appointed special master and FSHC. The parties agree to request that the special master review the claim for credits based on applicable law and report regarding the appropriateness of crediting those units. Corbin City will also adopt a Housing Element and Fair Share Plan and, if it chooses to institute residential or non-residential development fees, a Spending Plan in conformance with the terms of this Agreement.

7. The parties agree that if a decision of a court of competent jurisdiction in Atlantic County or a determination by an administrative agency responsible for implementing the Fair Housing Act, or an action by the New Jersey Legislature, would result in a calculation of an obligation for Corbin City for the period 1999-2025 that would be lower by more than twenty (20%) percent than the total gap and prospective Third Round need obligation established in this agreement, and if that calculation is memorialized in an unappealable final judgment, Corbin City may seek to amend the judgment in this matter to reduce its fair share obligation accordingly. Notwithstanding any such reduction, the Corbin City shall be obligated to implement the fair share plan attached hereto, including by leaving in place any site specific zoning adopted or relied upon in connection with the Plan approved pursuant to this settlement agreement; taking all steps necessary to support the development of any 100% affordable developments referenced herein; maintaining all mechanisms to address unmet need; and otherwise fulfilling fully the fair share obligations as established herein. The reduction of the Township's/Borough's obligation below that established in this agreement does not provide a basis for seeking leave to amend this agreement or seeking leave to amend an order or judgment pursuant to R. 4:50-1. If Corbin City prevails in reducing its prospective need for the Third Round, Corbin City may carry over any resulting extra credits to future rounds in conformance with the then-applicable law.
8. The following provisions only apply to Corbin City if regulations change pursuant to paragraph 5(c) of this Agreement.
  - a. On the first anniversary of the master plan reexamination referenced in paragraph 5(c) and every anniversary thereafter through the end of this agreement, Corbin City agrees to provide annual reporting of the status of all affordable housing activity within the municipality through posting on the municipal website with a copy of such posting provided to Fair Share Housing Center, using forms previously developed for this purpose by the Council on Affordable Housing or any other forms endorsed by the Special Master and FSHC.
  - b. For the midpoint realistic opportunity review due on July 1, 2020, as required pursuant to N.J.S.A. 52:27D-313, Corbin City, if the changes described in paragraph 5(c) has occurred at least one year before that time, will post on its municipal website, with a copy provided to Fair Share Housing Center, a status report as to its implementation of this Agreement and an analysis of whether any unbuilt sites or unfulfilled mechanisms continue to present a realistic opportunity and whether any mechanisms to meet unmet need should be revised or supplemented. Such posting shall invite any interested party to submit comments to the municipality, with a copy to Fair Share Housing Center, regarding whether any sites no longer present a realistic opportunity and should be replaced and whether any mechanisms to meet unmet need should be revised or supplemented. Any interested party may by motion request a hearing before the court regarding these issues.
  - c. For the review of very low income housing requirements required by N.J.S.A. 52:27D-329.1, within 30 days of the third anniversary of the master plan reexamination, and every third year thereafter, the Township will post on its municipal website, with a copy provided to Fair Share Housing Center, a status report as to its satisfaction of its

very low income requirements.

9. FSHC is hereby deemed to have party status in this matter and to have intervened in this matter as a defendant without the need to file a motion to intervene or an answer or other pleading. The parties to this agreement agree to request the Court to enter an order declaring FSHC is an intervenor, but the absence of such an order shall not impact FSHC's rights.
10. This settlement agreement must be approved by the Court following a fairness hearing as required by Morris Cty. Fair Hous. Council v. Boonton Twp., 197 N.J. Super. 359, 367-69 (Law Div. 1984), aff'd o.b., 209 N.J. Super. 108 (App. Div. 1986); East/West Venture v. Borough of Fort Lee, 286 N.J. Super. 311, 328-29 (App. Div. 1996). Corbin City shall present its planner as a witness at this hearing. FSHC agrees to support this Agreement at the fairness hearing. In the event the Court approves this proposed settlement, the parties contemplate the municipality will receive "the judicial equivalent of substantive certification and accompanying protection as provided under the FHA," as addressed in the Supreme Court's decision in In re N.J.A.C. 5:96 & 5:97, 221 N.J. 1, 36 (2015). The "accompanying protection" shall remain in effect through July 1, 2025. If the settlement agreement is rejected by the Court at a fairness hearing it shall be null and void.
11. If an appeal is filed of the Court's approval or rejection of the Settlement Agreement, the Parties agree to defend the Agreement on appeal, including in proceedings before the Superior Court, Appellate Division and New Jersey Supreme Court, and to continue to implement the terms of the Settlement Agreement if the Agreement is approved before the trial court unless and until an appeal of the trial court's approval is successful at which point, the Parties reserve their right to rescind any action taken in anticipation of the trial court's approval. All Parties shall have an obligation to fulfill the intent and purpose of this Agreement.
12. This settlement agreement may be enforced through a motion to enforce litigant's rights or a separate action filed in Superior Court, Atlantic County. A prevailing movant or plaintiff in such a motion or separate action shall be entitled to reasonable attorney's fees.
13. Unless otherwise specified, it is intended that the provisions of this Agreement are to be severable. The validity of any article, section, clause or provision of this Agreement shall not affect the validity of the remaining articles, sections, clauses or provisions hereof. If any section of this Agreement shall be adjudged by a court to be invalid, illegal, or unenforceable in any respect, such determination shall not affect the remaining sections.
14. This Agreement shall be governed by and construed by the laws of the State of New Jersey.
15. This Agreement may not be modified, amended or altered in any way except by a writing signed by each of the Parties.
16. This Agreement may be executed in any number of counterparts, each of which shall be



an original and all of which together shall constitute but one and the same Agreement.

17. The Parties acknowledge that each has entered into this Agreement on its own volition without coercion or duress after consulting with its counsel, that each party is the proper person and possess the authority to sign the Agreement, that this Agreement contains the entire understanding of the Parties and that there are no representations, warranties, covenants or undertakings other than those expressly set forth herein.
18. Each of the Parties hereto acknowledges that this Agreement was not drafted by any one of the Parties, but was drafted, negotiated and reviewed by all Parties and, therefore, the presumption of resolving ambiguities against the drafter shall not apply. Each of the Parties expressly represents to the other Parties that: (i) it has been represented by counsel in connection with negotiating the terms of this Agreement; and (ii) it has conferred due authority for execution of this Agreement upon the persons executing it.
19. Any and all Exhibits and Schedules annexed to this Agreement are hereby made a part of this Agreement by this reference thereto. Any and all Exhibits and Schedules now and/or in the future are hereby made or will be made a part of this Agreement with prior written approval of both Parties.
20. This Agreement constitutes the entire Agreement between the Parties hereto and supersedes all prior oral and written agreements between the Parties with respect to the subject matter hereof except as otherwise provided herein.
21. No member, official or employee of Corbin City shall have any direct or indirect interest in this Settlement Agreement, nor participate in any decision relating to the Agreement which is prohibited by law, absent the need to invoke the rule of necessity.
22. Anything herein contained to the contrary notwithstanding, the effective date of this Agreement shall be the date upon which all of the Parties hereto have executed and delivered this Agreement.
23. All notices required under this Agreement ("Notice[s]") shall be written and shall be served upon the respective Parties by certified mail, return receipt requested, or by a recognized overnight or by a personal carrier. In addition, where feasible (for example, transmittals of less than fifty pages) shall be served by facsimile or e-mail. All Notices shall be deemed received upon the date of delivery. Delivery shall be affected as follows, subject to change as to the person(s) to be notified and/or their respective addresses upon ten (10) days notice as provided herein:

**TO FSHC:** Adam M. Gordon, Esq.  
Fair Share Housing Center  
510 Park Boulevard  
Cherry Hill, NJ 08002  
Phone: (856) 665-5444  
Telecopier: (856) 663-8182



November 14, 2017  
Page 7

E-mail: adamgordon@fairsharehousing.org

**TO CORBIN CITY:**

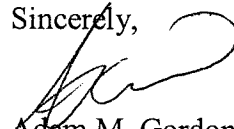
Robert P. Merenich, Esq.  
Gemmel, Todd and Merenich, PA  
PO Box 296, 767 Shore Rd.  
Linwood, New Jersey 08221  
Phone: (609) 927-7200  
Telecopier: (609) 927-3278  
Email: [bobmerenich@comcast.net](mailto:bobmerenich@comcast.net)

**WITH A COPY TO THE  
MUNICIPAL CLERK:**

Joanne Siedlecki  
316 Route 50  
Corbin City, NJ 08270  
Phone: (609) 628-2673  
Telecopier: (609) 628-3017


Please sign below if these terms are acceptable.

Sincerely,



Adam M. Gordon, Esq.  
Counsel for Intervenor/Interested Party  
Fair Share Housing Center

On behalf of the City of Corbin City with the authorization  
of the governing body:

 Attorney for Corbin City  
Robert P. Merenich, Esq.  
Dated: 11/14/17

## **Appendix B**

### **Corbin City Third Round Final JOR**

ATL L 001533-15 08/31/2018 Pg 1 of 4 Trans ID: LCV20181514982

ATL-L-001533-15 08/30/2018 7:54:55 AM Pg 1 of 4 Trans ID: LCV20181504807

Robert P. Merenich, Esquire (024621993)  
**GEMMEL, TODD & MERENICH, P.A.**  
 767 Shore Road  
 P.O. Box 296  
 Linwood, New Jersey 08221  
 (609) 927-7200  
Attorneys for Declaratory Plaintiff, City of Corbin City

	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: ATLANTIC COUNTY
	:	
IN THE MATTER OF THE	:	
APPLICATION OF THE CITY OF	:	DOCKET NO.: ATL-L-1533-15
CORBIN CITY, COUNTY OF	:	
ATLANTIC	:	
	:	
	:	FINAL THIRD ROUND JUDGMENT
	:	OF COMPLIANCE AND REPOSE

THIS MATTER having been opened to the Court by Robert P. Merenich, Esquire, of the law firm of Gemmel, Todd & Merenich, P.A., on behalf of the Petitioner, Corbin City, (hereinafter "the City"); and in the presence of Adam Gordon, Esquire, legal counsel to the Fair Share Housing Council ("FSHC"); and the Court being in receipt of the findings and recommendations of the Honorable Steven P. Perskie, J.S.C. (Ret'd.), the Court-appointed Special Master ("The Master") in this litigation; and the Court having conducted a Fairness Hearing on May 25, 2018 with regard to approving the Settlement Agreement between FSHC and Corbin City; and the Court having heard the testimony of Corbin City's Planner, Susan Gruel, PP/AICP, and the Chairperson of the Corbin City Planning Board, John Peterson, P.P. on behalf of Corbin City and the Court having entered an Order of Fairness and Compliance on August 6, 2018;

AND the within litigation raising issues with regard to the compliance of the City with the requirements of the New Jersey Fair housing Act, *N.J.S.A. 52:27D-301*, et seq., ("NJFHA"), and more particularly, with the mandates of the New Jersey Supreme Court's decision of January 18, 2017, supplementing its ruling in the matter of *In Re: Adoption of N.J.A.C. 5:96*; 221 N.J. 1 (2015) (hereinafter "Mount Laurel IV"), which decision and prior rulings issued by the Supreme Court articulate what is known as "The Mount Laurel Doctrine";

AND the Court having considered the documents on the record and the Court having made at the conclusion of the Fairness Hearing factual findings of fact and determinations of law on the record as follows:

1. The Settlement Agreement between the City and FSHC is fair and reasonable, and adequately protects the interest of low and moderate income persons within the Township's housing region based upon the criteria set forth in *East/West Venture v. Borough of Fort Lee*, 286 N.J. Super. 311 (App. Div. 1996) for approving a settlement of Mount Laurel Litigation.
2. The City's proposed affordable housing strategy as set forth within the Settlement Agreement is facially constitutionally compliant and provides a fair and reasonable opportunity for the City to meet its obligation under Mount Laurel IV. .
3. Corbin City qualifies for a durational adjustment with regard to the timely implementation of any of the City's inclusionary development through the ending of the Third Round for the following reasons:
  - A. There is no public water or sewer rendering the development of high density development impractical if not impossible especially when considering the environmental constraints set forth below.
  - B. Corbin City is 7.81 total square miles or 4998.4 acres. Of the 4998.4 acres 3462.4 acres are owned by the State: primarily NJDEP Fish & Wildlife. Sixty four (64) acres in Corbin City are located in the Pinelands Protection Area regulated by the Pinelands Comprehensive Management Plan (CMP) and is designated Forest Area. The remainder of the land is located within the Pinelands National Reserve, but is outside the state designated Pinelands Area. This area is otherwise regulated by the Coastal Area Facility Review Act (CAFRA) and includes approximately five square miles that is located within the Lester G. MacNamara Wildlife Management Area (Tuckahoe). The Tuckahoe River, an officially designated Wild and Scenic River as well a C-1 state regulated water, runs along the border of Corbin City.
  - C. Corbin City falls within Planning Areas Four (4) and Five (5) under the State of New

Jersey Planning Map and there are no growth areas on its borders. Accordingly, all of Corbin City is either completely restricted from growth or designated for limited growth. Wild and endangered species have been identified and catalogued within Corbin City.

- D. Corbin City's CAFRA Coastal Center expired on February 7, 2005 and there is no prospect for its return.
- E. The Corbin City Master Plan Re-Examination in 1995 concluded that due to environmental constraints together with a corresponding lack of water and sewerage infrastructure construction of new affordable housing units was impractical if not impossible.
- F. Corbin City has set aside a Trailer and Mobile Home District with the express purpose, as set forth in its ordinance of "...maintain[ing] availability of affordable housing that meets COAH guidelines and recognize existing uses, while allowing upgrading of same." The Trailer and Mobile Home District exists in the middle of the municipality and is delineated by the intersections of Godfrey and Washington Lanes with Samson and Sunset Roads. There are approximately forty (40) units within this District. This is the area wherein the City will conduct its credits without controls survey as provided in the Settlement Agreement.

AND the Corbin City Planning Board having approved, on August 21, 2018, a Housing Element and Fair Share Plan ("Fair Share Plan"), which Fair Share Plan FSHC reviewed and found consistent with the standards set forth at *N.J.S.A. 40:55D-1*, et seq. and Mount Laurel IV, and for other good cause shown:

IT IS ON THIS 31st day of August, 2018 ORDERED and ADJUDGED as follows:

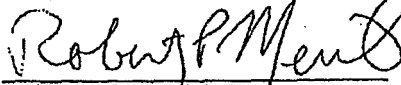
1. The City of Corbin City's Fair Share Plan is hereby approved, and the City of Corbin City is granted a Final Third Round Judgment of Compliance and Repose pursuant to the Fair Housing Act (*N.J.A.C. 52:27D-301* et seq. ), any applicable Council on Affordable Housing substantive regulations and Mount Laurel case law, including the mandates of the New Jersey Supreme Court's decision of January 18, 2017, supplementing its ruling in the matter of *In Re: Adoption of N.J.A.C.*

5:96; 221 N.J. 1 (2015) (hereinafter "Mount Laurel IV"), which decision and prior rulings issued by the Supreme Court articulate what is known as "The Mount Laurel Doctrine.

2. The City's Judgment of Compliance and Repose shall remain in effect for ten (10) years, commencing on July 8, 2015 and ending on July 8, 2025 during which time the City will have immunity and repose from any and all Mount Laurel Lawsuits, including "builders remedy lawsuits," "constitutional compliance actions," and any other matter of lawsuit brought under the Mount Laurel Doctrine with the sole exception of any action(s) to enforce this Judgment or the Settlement Agreement upon which this Judgment is based.
3. As is set forth in the Order of Fairness and Compliance entered on August 6, 2018, the credits without controls inventory shall be completed, with the results analyzed, on or before November 2, 2018.
4. In the event the actions required by Paragraph Three (3) are not completed in a timely fashion, this Court retains jurisdiction to hear any challenge(s) to the City's entitlement to the immunity granted herein.
5. The Court retains jurisdiction over this matter solely for the purpose of enforcement of this Judgment of Compliance and Repose and the Settlement Agreement.
6. The City shall forward a copy of this Judgment of Compliance and Repose to the Special Master and the FSHC service list within seven (7) days of receipt of this executed Judgment.

  
Nelson C. Johnson, J.S.C.

Consented to as to form and substance:

  
Robert P. Mererich, Esq.  
Attorney for the City of Corbin City

  
Adam M. Gordon, Esq.  
Attorney for Fair Share Housing Center

## **Appendix C**

### **Corbin City Resolution #38-2025**

### **Establishing Fourth Round Obligations**

**CITY OF CORBIN CITY  
COUNTY OF ATLANTIC  
STATE OF NEW JERSEY**

**RESOLUTION No. 38-2025  
RESOLUTION APPROVING THE FOURTH ROUND OF  
AFFORDABLE HOUSING OBLIGATIONS**

**WHEREAS**, on March 20, 2024, Governor Murphy signed into law an Amendment to the Fair Housing Act (N.J.S.A. 52:27D-301 *et seq.*) (hereinafter “Amended FHA”); and

**WHEREAS**, the Amended FHA requires the Department of Community Affairs (“DCA”) to produce non-binding estimates of fair share obligations on or before October 20, 2024; and

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

**WHEREAS**, the DCA calculated the City of Corbin City as having a Present Need or Rehabilitation Obligation of zero (0) units and a Prospective Need Obligation of six (6) units for the Fourth Round; and

**WHEREAS**, the Amended FHA requires every municipality in the State of New Jersey to adopt a binding resolution establishing its fair share affordable housing obligation for the Fourth Round by January 31, 2025; and

**WHEREAS**, the City of Corbin City’s affordable housing professionals have reviewed the present need and prospective share published by the DCA and have recommended that the City adopt these amounts as its Fourth Round Fair Share obligation; and

**WHEREAS**, the Mayor and City Council for the City of Corbin City have reviewed this matter and agree to accept the recommendations of the City’s affordable housing professionals and take other necessary actions in connection with the FHA; and

**WHEREAS**, the City of Corbin City also reserves the right to adjust its position in the event of any rulings in the *Montvale* case (MER-L-1778-24) or any other such action that alters the deadlines and/or requirements of the Amended FHA; and

**WHEREAS**, in the event that a third party challenges the calculations provided for in this Resolution, the City of Corbin City reserves the right to take such position as it deems appropriate in response thereto, including that its Round 4 Present or Prospective Need Obligations should be lower than described herein; and

**WHEREAS**, in light of the above, the Council of the City of Corbin City finds that it is in the best interest of the City to declare its commitment to the obligations reported by the DCA on October 18, 2024 subject to the reservations set forth herein; and

**WHEREAS**, the City of Corbin City seeks a certification of compliance with the FHA.



**NOW, THEREFORE, BE IT RESOLVED** that the Mayor and City Council of the City of Corbin City, hereby establish its Fourth Round Affordable Housing Fair Share obligation as a Present Need or Rehabilitation Share of zero (0) units and a Prospective Need Share of six (6) units; and

**BE IT FURTHER RESOLVED** that the City of Corbin City's Fourth Round Affordable Housing Fair Share obligation is subject to vacant land adjustments and other amendments as may be provided for by law, and the City hereby reserves its right to adjust its Fourth Round Affordable Housing Fair Share obligation accordingly.; and

**BE IT FURTHER RESOLVED** that the City of Corbin City's Solicitor is hereby authorized to file an action in the form of a declaratory judgment complaint and civil case information statement within 48 hours after the adoption of this resolution.

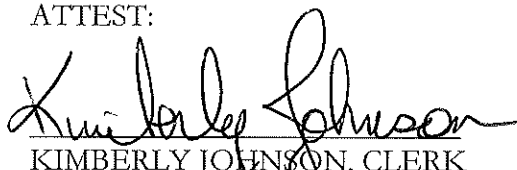
**BE IT FURTHER RESOLVED** that the City of Corbin City's affordable housing professionals shall submit the City into the DCA affordable housing dispute program and take any other action necessary to comply with the Amended FHA and implement its Fourth Round Affordable Housing Fair Share obligation, including but not limited to defending any challenges to the City's actions herein; and


**BE IT FURTHER RESOLVED**, the City also authorizes its affordable housing professionals to prepare the appropriate Housing Element and Fair Share Plan as a component of the City's Master Plan so that is filed with DCA on or before June 30, 2025; and

**BE IT FURTHER RESOLVED**, that a copy of this Resolution shall be submitted to the DCA upon its adoption.

Adopted: January 27, 2025

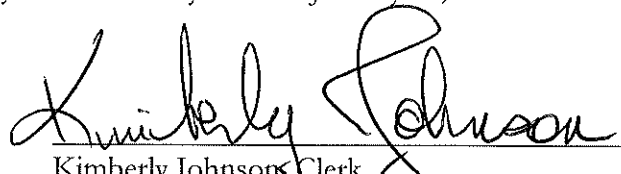
ATTEST:

  
KIMBERLY JOHNSON, CLERK

  
LAVERNE KIRN,  
COUNCIL PRESIDENT

**CERTIFICATION**

I, Kimberly Johnson, Clerk of the City of Corbin City, County of Atlantic, State of New Jersey, do hereby certify that the foregoing is a true copy of a resolution duly adopted at a public meeting of the Governing Body of the City of Corbin City held on January 27, 2025.

  
Kimberly Johnson, Clerk

## **Appendix D**

### **Amended Court Order Fixing Corbin City's Obligations for "Present Need" and "Prospective Need" for the Fourth Round Housing Cycle**

**STEPHANIE E. FARRELL, ESQ.**  
**NJ Bar ID # 003401998**  
**NEHMAD DAVIS & GOLDSTEIN, P.C.**  
 4030 Ocean Heights Avenue  
 Egg Harbor Twp., NJ 08234  
 Phone: (609) 927-1177  
 Fax: (609) 926-9721  
[sfarrell@ndglegal.com](mailto:sfarrell@ndglegal.com)  
*Attorneys for Petitioner, City of Corbin City*

**IN THE MATTER OF THE  
 DECLARATORY JUDGMENT  
 ACTION OF THE CITY OF  
 CORBIN, ATLANTIC COUNTY  
 PURSUANT TO P.L. 2024,  
 CHAPTER 2**

**SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION – CIVIL PART  
 ATLANTIC COUNTY  
 DOCKET NO. ATL-L-194-25**

Civil Action

**AMENDED ORDER FIXING MUNICIPAL  
 OBLIGATIONS FOR “PRESENT NEED”  
 AND “PROSPECTIVE NEED” FOR THE  
 FOURTH ROUND HOUSING CYCLE**

**THIS MATTER**, having come before the Court on its own motion, *sua sponte*, on the Complaint for Declaratory Judgment filed on January 29, 2025 ("DJ Complaint") by the Petitioner, **CITY OF CORBIN CITY** ("Petitioner" or "Municipality"), pursuant to N.J.S.A. 52:27D-304.2, -304.3, and -304.1(f)(1)(c) of the New Jersey Fair Housing Act, N.J.S.A. 52:27D-301, *et seq.* (collectively, the "FHA"), and in accordance with Section II.A of Administrative Directive #14-24 ("Directive #14-24") of the Affordable Housing Dispute Resolution Program (the "Program"), seeking a certification of compliance with the FHA;

**AND IT APPEARING**, that on October 18, 2024, pursuant to the FHA (as amended), the New Jersey Department of Community Affairs ("DCA") issued its report entitled *Affordable*

*Housing Obligations for 2025-2035 (Fourth Round)*<sup>1</sup>, therein setting forth the present need and prospective need obligations of all New Jersey municipalities for the Fourth Round housing cycle (the "DCA's Fourth Round Report");

**AND IT APPEARING** that, pursuant to the DCA's Fourth Round Report, the **present need** obligation of the Petitioner has been calculated and reported as 0 affordable units, and its **prospective need** obligation of the Petitioner has been calculated and reported as 6 affordable units, and which calculations have been deemed presumptively valid for purposes of the FHA;

**AND THE COURT**, having determined that no interested party has filed a challenge to the Petitioner's DJ Complaint by way of an Answer thereto as provided for and in accordance with Section II.B of Directive #14-24 of the Program;

**AND THE COURT**, having found and determined, therefore, that the present need and prospective need affordable housing obligations of the Petitioner for the Fourth Round housing cycle as calculated and reported in the DCA's Fourth Round Report have been committed to by the Petitioner and are uncontested, and for good cause having otherwise been shown;

**AND THE COURT**, having entered an Order Fixing Municipal Obligations for "Present Need" and "Prospective Need" for the Fourth Round Housing Cycle on March 27, 2025;

**AND THE COURT**, having been alerted regarding a typographical error in the March 27, 2025 Order, erroneously identifying the Petitioner/Municipality as the Borough of Folsom, when in fact the Petitioner/Municipality in this matter is the City of Corbin City;

**AND THE COURT**, having determined it appropriate to correct this typographical error to identify the correct petitioner for purposes of clarifying the record:

**IT IS, THEREFORE**, on this 6<sup>th</sup> day of May, 2025 **ORDERED**

---

<sup>1</sup> See [https://nj.gov/dca/dlps/pdf/FourthRoundCalculation Methodology.pdf](https://nj.gov/dca/dlps/pdf/FourthRoundCalculation%20Methodology.pdf)

**AND ADJUDGED** as follows:

1. That the Order entered on March 27, 2025, is hereby amended as set forth herein.
2. That the present need obligation of the Municipality, be, and hereby is fixed as 0 affordable units for the Fourth Round housing cycle.
3. That the prospective need obligation of the Municipality, be, and hereby is fixed as 6 affordable units for the Fourth Round Housing cycle; and
4. That the Petitioner is hereby authorized to proceed with preparation and adoption of its proposed Housing Element and Fair Share Plan for the Fourth Round, incorporating therein the present need and prospective need allocations aforesaid (and which plan shall include the elements set forth in the "Addendum" attached to Directive #14-24), by or before June 30, 2025, as provided for and in accordance with Section III.A of Directive #14-24, and without further delay.

**IT IS FURTHER ORDERED**, that a copy of this Order shall be deemed served on the Petitioner and Petitioner's counsel.

SO ORDERED:

  
\_\_\_\_\_  
Hon. John C. Porto, P.J.Cv.

(X) Uncontested.

## **Appendix E**

### **Corbin City Complaint for Declaratory Relief Pursuant to Directive #14-24 from the Administrative Office of the Courts**

**STEPHANIE E. FARRELL, ESQ.**  
**NJ Bar ID # 003401998**  
**NEHMAD DAVIS & GOLDSTEIN, P.C.**  
4030 Ocean Heights Avenue  
Egg Harbor Twp., NJ 08234  
Phone: (609) 927-1177  
Fax: (609) 926-9721  
[sfarrell@ndglegal.com](mailto:sfarrell@ndglegal.com)  
*Attorneys for Plaintiff, City of Corbin City*

**IN THE MATTER OF THE  
APPLICATION OF THE CITY OF  
CORBIN CITY, COUNTY OF ATLANTIC**

SUPERIOR COURT OF NEW JERSEY  
CIVIL PART – LAW DIVISION  
DOCKET NO. ATL-

Civil Action  
(Mount Laurel)

**COMPLAINT FOR DECLARATORY  
RELIEF PURSUANT TO DIRECTIVE  
#14-24 FROM THE ADMINISTRATIVE  
OFFICE OF THE COURTS**

Plaintiff, the City of Corbin City, a municipal corporation of the State of New Jersey, with principal offices located at 316 Route 50, Corbin City, New Jersey, alleges and says:

### **JURISDICTION**

1. Jurisdiction in this matter is established pursuant to the Fair Housing Act, N.J.S.A. 52:27D-304.1(f)(1)(b) and Directive #14-2024 issued by the Administrative Office of the Courts.

### **INTRODUCTION**

2. The “Mount Laurel Doctrine” refers to New Jersey’s affordable housing laws which derived from the landmark cases, *Burlington County N.A.A.C.P. v. Twp. of Mount Laurel*, 67 N.J. 151 (1975), *cert. denied*, 423 U.S. 808 (1975) (collectively, “Mount Laurel I”), *So. Burlington County N.A.A.C.P. v. Tp. of Mount Laurel*, 92 N.J. 158 (1983) (“Mount Laurel II”), *Hills Development Co. v. Township of Bernards*, 103 N.J. 1 (1986) (“Mount Laurel III”), *In re Adoption of N.J.A.C. 5:96 & 5:97 ex rel. New Jersey Council on Affordable Housing*, 221 N.J. 1 (2015)

(“Mount Laurel IV”), the New Jersey Fair Housing Act, *N.J.S.A. 52:27D-301, et seq.* (“FHA”) and related laws.

3. The Mount Laurel Doctrine requires municipalities to use their zoning powers to provide a realistic opportunity for the production of affordable housing units for low- and moderate-income households. This constitutional obligation requires municipalities to provide their “fair share” of their region’s need for affordable housing, based on population changes and growth over time and has been enforced in periods of time called “rounds.”

4. For the first two rounds, the Council on Affordable Housing (“COAH”) was the state agency that oversaw compliance and implementation for each municipality through a process that, if successful, would lead to issuance of “substantive certification” by COAH.

5. When COAH attempted to implement its rules for the Third Round, however, the “Third Round Rules” were successfully challenged in court several times. Each time the Third Round Rules were rejected, COAH was required to amend them.

6. After the third amendment to the Third Round Rules was rejected, COAH failed to take further action to amend, and ultimately, COAH ceased operating altogether.

7. Thereafter, pursuant to Mount Laurel IV, the court resumed its role in overseeing and ensuring municipal compliance with constitutional affordable housing obligations.

8. Mount Laurel IV also established a process for obtaining approval in the form of a final judgment for the Third Round.

9. On March 20, 2024, amendments to the FHA were signed into law by Governor Murphy. *See N.J.S.A. 52:27D-301, et seq.* (the “Amended FHA”).

10. The Amended FHA required the establishment of an Affordable Housing Program Alternative Dispute Resolution Program to be responsible for overseeing participating



municipalities’ conformance with the Act, as well as to oversee dispute resolution relating thereto. *See N.J.S.A. 52:27D-304.1(f)(1).*

11. On October 18, 2024, the New Jersey Department of Community Affairs (“DCA”) issued a report pursuant to the Amended FHA, entitled “Affordable Housing Obligation for 2025-2035 (Fourth Round) Methodology and Background” (the “Fourth Round Report”).

12. On or about December 13, 2024, the Administrative Office of the Courts issued Directive #14-2024 which “promulgates procedures and guidelines implementing the Affordable Housing Alternative Dispute Resolution Program (“Program”)” pursuant to the Amended FHA.

13. Directive #14-2024 mandates that a municipality file a declaratory judgment action within 48 hours of adopting a resolution accepting or rejecting the DCA’s allocation of prospective need as set forth in the Fourth Round Report.

### **CORBIN CITY’S COMPLIANCE WITH THE FHA**

14. The City of Corbin City is a body corporate and politic organized under the laws of the State of New Jersey, County of Atlantic.

15. The City of Corbin City Council is the governing body of the City of Corbin City (hereinafter “Corbin City” or the “City”), and is responsible, *inter alia*, to ensure that appropriate and necessary actions are taken to achieve and comply with its affordable housing obligations under the “Mount Laurel Doctrine.”

16. The Planning Board of the City of Corbin City is the municipal agency responsible under the Municipal Land Use Law, *N.J.S.A. 40:55D-1, et. seq.*, (“MLUL”), for implementing the City’s Master Plan, including the Housing Element, in a manner that is consistent and compliant with the Township’s obligations under the Mount Laurel Doctrine.

17. Corbin City’s obligation under the Third Round of obligations was reached by settlement between the Fair Share Housing Center (“FSHC”) and the City pursuant to the New Jersey Supreme Court’s decision in Mount Laurel IV.

18. Pursuant to that agreement, Corbin City’s affordable housing obligation was determined to be forty-three (43) units, including two (2 )Present Need units, thirteen (13) Prior Round units, and twenty-eight (28) Third Round Gap and Prospective Need units.

19. Corbin City obtained a Final Third Round Judgment of Compliance and Repose dated August 31, 2018, confirming the City satisfied its Third Round obligations and reconfirming the City’s prior round obligations (“JOC”).

20. Accordingly, Corbin City is in compliance with all reporting, monitoring and other requirements of the prior rounds in accordance with the FHA and its JOC.

21. In the Fourth Round Report, the DCA calculated that Corbin City has a Fourth Round present need of zero (0) units and a prospective need of six (6) low- and moderate-income units.

**COUNT I**  
**DECLARATION OF THE CITY OF CORBIN CITY’S**  
**FOURTH ROUND PRESENT AND PROSPECTIVE NEED**

22. Corbin City restates and incorporates the allegations set forth in the preceding paragraphs as if more full set forth herein.

23. At a special meeting of the Council for the City of Corbin City, conducted on January 27, 2025, in accordance with the Open Public Meetings Act, the City adopted Resolution #38-2025 in satisfaction of its obligation pursuant to *N.J.S.A.* 52:27D-304.1(f)(1)(a) and (b). *See* above and Exhibit A.

24. Resolution #38-2025 accepts the calculation of Corbin City's present and prospective need obligations by the DCA in the Fourth Round Report, and the City voluntarily submits itself to the jurisdiction of the Program as established by the Amended FHA.

25. Resolution #38-2025 was published to the Township's website on January 29, 2025.

26. The City of Corbin City is therefore entitled to continued immunity from exclusionary zoning litigation as it has complied with its Fourth Round obligations under the Amended FHA.

**WHEREFORE**, the City of Corbin City hereby demands judgment:

- a. Declaring that the City of Corbin City has a Fourth Round Affordable Housing present need of zero (0) and prospective need of six (6);
- b. Entering an Order reaffirming the City of Corbin City's and its Planning Board's immunity from all exclusionary zoning litigation pursuant to *N.J.S.A. 52:27D-304.1, et seq.*, while the City of Corbin City prepares, adopts, endorses, and files its Housing Element and Fair Share Plan for the Fourth Round and provides the required public Notice regarding same; and
- c. Granting such other and further relief as the Court deems equitable and just.

**COUNT II**  
**APPROVAL OF THE CITY OF CORBIN CITY'S**  
**HOUSING ELEMENT AND FAIR SHARE PLAN**

27. Corbin City restates and incorporates the allegations set forth in the preceding paragraphs as if more full set forth herein.

28. Corbin City has demonstrated a long-standing commitment to comply voluntarily with its constitutional affordable housing obligation in response to the FHA.

29. The City will address its Fourth Round present need (rehabilitation share) and prospective need following a determination from the Court of the City's present and prospective fair share obligation.

30. Corbin City has fully complied with its First, Second, and Third Round (prior round) fair share affordable housing obligations.

31. Pursuant to Resolution #38-2025 Corbin City intends to develop a Fourth Round Housing Element and Fair Share Plan ("Fourth Round HEFSP") that will provide an opportunity for the creation of sufficient low- and moderate-income housing by 2035, to satisfy the Township's calculated and accepted Fourth Round present and prospective need pursuant to the Amended FHA.

32. In accordance with Paragraph III.A. of AOC Directive #14-2024, the City will file its adopted Fourth Round HEFSP no later than June 30, 2025.

**WHEREFORE**, the City of Corbin City hereby demands judgment:

- a. Declaring that the City of Corbin City's Fourth Round HEFSP, to be adopted and filed with this Court in accordance with the Amended FHA and Directive #14-24 complies with the requirements of the Amended FHA;
  - b. Declaring and issuing compliance certification and immunity from exclusionary zoning litigation in accordance with the Amended FHA and Directive #14-24 to the City of Corbin City for the period beginning July 1, 2025, and ending June 30, 2035;
  - c. Entering an Order approving the City of Corbin City's Spending Plan, to be filed with the Court, or as amended in the future, and declaring that the City is free to expend the funds consistent with the programs contemplated in its Spending Plan;
- and

d. Granting such other and further relief as the Court deems equitable and just.

NEHMAD DAVIS & GOLDSTEIN, P.C.  
Attorneys for Plaintiff

Dated: January 29, 2025

By: /s/ Stephanie E. Farrell  
STEPHANIE E. FARRELL

**CERTIFICATION PURSUANT TO RULE 4:5-1**

I hereby certify that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding. I further certify that no other action or arbitration proceeding is contemplated, except for any court-ordered mediation which is contemplated by the Amended FHA.

I further certify that other than the Fair Share Housing Center, the undersigned is not aware of any other parties that may have an interest in this litigation.

I understand that I have a continuing obligation during the course of the litigation to file and serve on all other parties and with the Court an Amended Certification if there is a change in the facts stated above. I further understand that I am under a continuing duty to disclose the names of any other parties who should be joined in this action, and that the Court may compel the joinder of additional parties in appropriate circumstances, either upon its own motion or that of a party.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

NEHMAD DAVIS & GOLDSTEIN, P.C.  
Attorneys for Plaintiff

Dated: January 29, 2025

By: /s/ Stephanie E. Farrell  
STEPHANIE E. FARRELL

**DESIGNATION OF TRIAL COUNSEL**

Stephanie E. Farrell, Esquire is hereby designated as trial counsel pursuant to R. 4:25-4.

NEHMAD DAVIS & GOLDSTEIN, P.C.  
Attorneys for Plaintiff

Dated: January 29, 2025

By: /s/ *Stephanie E. Farrell*  
STEPHANIE E. FARRELL

# Exhibit “A”

**CITY OF CORBIN CITY  
COUNTY OF ATLANTIC  
STATE OF NEW JERSEY**

**RESOLUTION No. 38-2025  
RESOLUTION APPROVING THE FOURTH ROUND OF  
AFFORDABLE HOUSING OBLIGATIONS**

**WHEREAS**, on March 20, 2024, Governor Murphy signed into law an Amendment to the Fair Housing Act (N.J.S.A. 52:27D-301 *et seq.*) (hereinafter “Amended FHA”); and

**WHEREAS**, the Amended FHA requires the Department of Community Affairs (“DCA”) to produce non-binding estimates of fair share obligations on or before October 20, 2024; and

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

**WHEREAS**, the DCA calculated the City of Corbin City as having a Present Need or Rehabilitation Obligation of zero (0) units and a Prospective Need Obligation of six (6) units for the Fourth Round; and

**WHEREAS**, the Amended FHA requires every municipality in the State of New Jersey to adopt a binding resolution establishing its fair share affordable housing obligation for the Fourth Round by January 31, 2025; and

**WHEREAS**, the City of Corbin City’s affordable housing professionals have reviewed the present need and prospective share published by the DCA and have recommended that the City adopt these amounts as its Fourth Round Fair Share obligation; and

**WHEREAS**, the Mayor and City Council for the City of Corbin City have reviewed this matter and agree to accept the recommendations of the City’s affordable housing professionals and take other necessary actions in connection with the FHA; and

**WHEREAS**, the City of Corbin City also reserves the right to adjust its position in the event of any rulings in the *Montvale* case (MER-L-1778-24) or any other such action that alters the deadlines and/or requirements of the Amended FHA; and

**WHEREAS**, in the event that a third party challenges the calculations provided for in this Resolution, the City of Corbin City reserves the right to take such position as it deems appropriate in response thereto, including that its Round 4 Present or Prospective Need Obligations should be lower than described herein; and

**WHEREAS**, in light of the above, the Council of the City of Corbin City finds that it is in the best interest of the City to declare its commitment to the obligations reported by the DCA on October 18, 2024 subject to the reservations set forth herein; and

**WHEREAS**, the City of Corbin City seeks a certification of compliance with the FHA.



**NOW, THEREFORE, BE IT RESOLVED** that the Mayor and City Council of the City of Corbin City, hereby establish its Fourth Round Affordable Housing Fair Share obligation as a Present Need or Rehabilitation Share of zero (0) units and a Prospective Need Share of six (6) units; and

**BE IT FURTHER RESOLVED** that the City of Corbin City's Fourth Round Affordable Housing Fair Share obligation is subject to vacant land adjustments and other amendments as may be provided for by law, and the City hereby reserves its right to adjust its Fourth Round Affordable Housing Fair Share obligation accordingly; and

**BE IT FURTHER RESOLVED** that the City of Corbin City's Solicitor is hereby authorized to file an action in the form of a declaratory judgment complaint and civil case information statement within 48 hours after the adoption of this resolution.


**BE IT FURTHER RESOLVED** that the City of Corbin City's affordable housing professionals shall submit the City into the DCA affordable housing dispute program and take any other action necessary to comply with the Amended FHA and implement its Fourth Round Affordable Housing Fair Share obligation, including but not limited to defending any challenges to the City's actions herein; and

**BE IT FURTHER RESOLVED**, the City also authorizes its affordable housing professionals to prepare the appropriate Housing Element and Fair Share Plan as a component of the City's Master Plan so that is filed with DCA on or before June 30, 2025; and

**BE IT FURTHER RESOLVED**, that a copy of this Resolution shall be submitted to the DCA upon its adoption.

Adopted: January 27, 2024

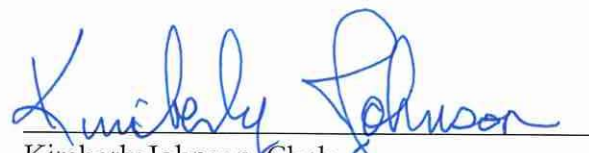
ATTEST:

  
KIMBERLY JOHNSON, CLERK

  
LAVERNE KIRN,  
COUNCIL PRESIDENT

**CERTIFICATION**

I, Kimberly Johnson, Clerk of the City of Corbin City, County of Atlantic, State of New Jersey, do hereby certify that the foregoing is a true copy of a resolution duly adopted at a public meeting of the Governing Body of the City of Corbin City held on January 27, 2025.

  
Kimberly Johnson, Clerk

# Civil Case Information Statement

## Case Details: ATLANTIC | Civil Part Docket# L-000194-25

**Case Caption:** IN THE MATTER OF CORBIN CITY

**Case Initiation Date:** 01/29/2025

**Attorney Name:** STEPHANIE E FARRELL

**Firm Name:** NEHMAD DAVIS & GOLDSTEIN, P.C.

**Address:** 4030 OCEAN HEIGHTS AVE

EGG HARBOR TWP NJ 08234

**Phone:** 6099271177

**Name of Party:** PLAINTIFF : 0106

**Name of Defendant's Primary Insurance Company**

(if known): None

**Case Type:** AFFORDABLE HOUSING

**Document Type:** Complaint

**Jury Demand:** NONE

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by:** 0106? NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

01/29/2025

Dated

/s/ STEPHANIE E FARRELL

Signed

## **Appendix F**

### **Corbin City Resolution #69-2024**

### **Appointing Municipal Housing Liaison**

**CITY OF CORBIN CITY  
COUNTY OF ATLANTIC  
STATE OF NEW JERSEY**

**RESOLUTION No. 69-2024**

**RESOLUTION APOINTING MUNICIPAL HOUSING LIAISON**

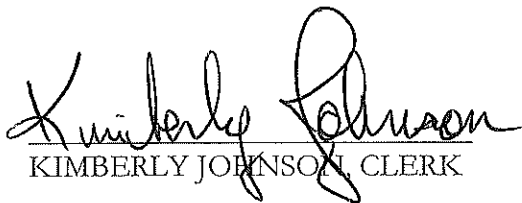
**WHEREAS**, pursuant to P.L. 2024, c.2, Corbin City is required to appoint a Municipal Housing Liaison for the oversight of administration of Corbin City's affordable housing program to enforce the requirements of the law and N.J.A.C. 5:80-26.1 et. seq.; and

**WHEREAS**, Corbin City has amended Chapter 19 entitled Administration to provide for the appointment of a Municipal Housing Liaison to administer Corbin City's affordable housing program.

**NOW THEREFORE BE IT RESOLVED**, by the Governing Body of Corbin City in the County of Atlantic and the State of New Jersey that Kimberly Johnson, City Clerk is hereby appointed by the Governing Body of Corbin City as the Municipal Housing Liaison for the administration of the affordable housing program, pursuant to and in accordance with Chapter 19, Article I, Administration, of the Code of the City of Corbin City.

Adopted: December 9, 2024

ATTEST:

  
KIMBERLY JOHNSON, CLERK

  
LAVERNE KIRN,  
COUNCIL PRESIDENT

## **Appendix G**

### **Corbin City Planning Board Resolution**

### **Adopting Fourth Round HEFSP**

## **Appendix H**

### **Corbin City Council Resolution**

### **Endorsing Fourth Round HEFSP**