

**From:** Paul Baldini  
**Sent:** Fri, 13 Feb 2026 17:17:44 -0400  
**To:** Ashley Lee  
**Cc:** James Waldron; Beth McManus  
**Subject:** RE: Borough of Avalon Settlement Agreement  
**Attachments:** Affordable Housing Mediation Agreement.pdf  
**Categories:** LEAP

Ashley,

Thank you for reaching out and following up on the agreement. The Borough adopted the agreement in the normal course. I thought I had sent it out but in reviewing my file I see I had not sent the executed document to your attention. I will upload the fully executed document to the court.

The Borough also looked into whether to amend its ordinances to create a development fee ordinance and the establishment of an affordable housing trust fund. After careful consideration of implementing the concepts, the Borough has determined not to implement the ordinances at this time and reserves the option to implement the concept in the future. The basis is based upon the circumstances of being a barrier island with no developable land available to create housing, there is no specific project that could benefit from the collection of funds, and creation of the trust and spending plan will capture an insufficient amount to be able to create housing. The Borough has committed to fund the programs in place without the creation of a separate fund. In reviewing the neighboring municipality that has a development fee and trust fund it has collected a minimum amount and incurred ongoing administrative costs and professional fees. The Borough remains open to the concept in the future and will continue to monitor circumstances in the Borough.

I thank you for your cooperation in this litigation.

Paul  
Sincerely,  
***Paul J. Baldini, Esquire***

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