

**RESOLUTION 114-2025**  
**RESOLUTION OF THE TOWNSHIP COMMITTEE OF THE TOWNSHIP**  
**OF EAST GREENWICH APPROVING A FOURTH ROUND**  
**AFFORDABLE HOUSING TRUST FUND SPENDING PLAN AND**  
**REQUESTING PROGRAM AND COURT APPROVAL OF THE**  
**SPENDING PLAN**

**WHEREAS**, the Township of East Greenwich (hereinafter "Township" or "East Greenwich") has an approved Development Fee Ordinance that was adopted on March 21, 2018 and amended with the approval of the Special Adjudicator in the Third Round, which established standards for the collection, maintenance, and expenditure of development fees; and

**WHEREAS**, on March 20, 2024, Governor Murphy signed into law P.L. 2024, c.2, which amended the 1985 New Jersey Fair Housing Act (hereinafter the "Amended FHA") which governs how municipalities will comply with their affordable housing obligations for the Fourth Round (2025-2035); and

**WHEREAS**, the Administrative Office of the Courts issued Directive #24-40 ("AOC Directive #14-24"), governing how municipalities file their compliance documents with the Affordable Housing Dispute Resolution Program ("the Program"); and

**WHEREAS**, the Township has prepared a Fourth Round Spending Plan consistent with the Amended FHA, AOC Directive #24-40, and other applicable regulations, which projects anticipated revenues to the Township's Affordable Housing Trust Fund and describes the anticipated expenditures of funds;

**NOW, THEREFORE, BE IT RESOLVED** by the Township Committee of the Township of East Greenwich, County of Gloucester, State of New Jersey, as follows:

1. The Township Committee of the Township of East Greenwich hereby approves the Fourth Round Spending Plan that is attached hereto as Exhibit A, and requests that the Program and the Court review and approve the Township's Fourth Round Spending Plan.
2. Township of East Greenwich shall promptly submit the Fourth Round Spending Plan to the Program and Court for its approval.
3. This Resolution shall take effect immediately upon adoption, according to law.

**ADOPTED** at a meeting of the Township Committee of the Township of East Greenwich held on the 24<sup>th</sup> day of June 2025.

**TOWNSHIP OF EAST GREENWICH**

BY: \_\_\_\_\_

JAMES R. PHILBIN, JR., Mayor

ATTEST:

  
\_\_\_\_\_  
ELIZABETH A. MCGILL, Township Clerk

**CERTIFICATION**

I certify that the foregoing Resolution was duly adopted by the Township Committee of the Township of East Greenwich at a regular meeting held on the 24<sup>th</sup> day of June 2025.

  
\_\_\_\_\_  
Municipal Clerk

**EAST GREENWICH TOWNSHIP  
GLOUCESTER COUNTY  
AFFORDABLE HOUSING TRUST FUND  
DEVELOPMENT FEE SPENDING PLAN**



**ROUND 4 (2025-2035)**  
**Approved by Governing Body**  
**\_\_\_\_\_, 2025**

**Alaimo Group**



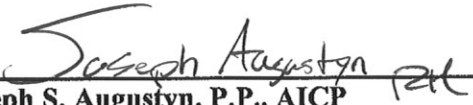
# **EAST GREENWICH TOWNSHIP GLOUCESTER COUNTY AFFORDABLE HOUSING TRUST FUND DEVELOPMENT FEE SPENDING PLAN**

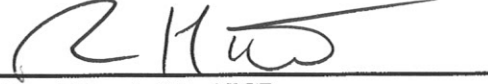
## **2025 MAYOR AND COMMITTEE**

Honorable James R. Philbin, Jr., Mayor  
Richard Schober, Deputy Mayor  
Eileen Hollingshead, Committee Member  
Robert Tice, Committee Member  
Michael Quigley, Committee Member

Elizabeth A. McGill, Township Clerk  
Marla M. DeMarcantonio, Esquire, Township Solicitor  
Jeffrey R. Surenian, Esquire, Affordable Housing Counsel  
Nancy L. Holm, Esquire, Affordable Housing Counsel  
Joseph S. Augustyn, PP, AICP, Planning Consultant  
Richard Hunt, PP, AICP, Planning Consultant

**ALAIMO GROUP  
200 High Street  
Mount Holly, NJ 08060**

  
**Joseph S. Augustyn, P.P., AICP**  
**N. J. Professional Planner No. 2447**

  
**Richard Hunt, PP, AICP**  
**N.J. Professional Planner No. 6478**

June 24, 2025

**EAST GREENWICH TOWNSHIP  
AFFORDABLE HOUSING TRUST FUND  
DEVELOPMENT FEE SPENDING PLAN  
2025 - 2035**

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## 1. INTRODUCTION

The Township of East Greenwich (hereinafter the "Township"), Gloucester County, has prepared a Housing Element and Fair Share Plan addressing its regional fair share of the affordable housing need in accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.), the Fair Housing Act (FHA) (N.J.S.A. 52:27D-301) and applicable COAH regulations (N.J.A.C. 5:91-1 et seq. and N.J.A.C. 5:93-1 et seq.). The Township began collecting development fees in 2009, after its initial Development Fee Ordinance was adopted by the Township, and COAH approved on February 4, 2009.

As of May 19, 2025, the Township has a balance of **\$2,299,670.13** in its Affordable Housing Trust fund. All development fees, payments in lieu of constructing affordable units on site, funds from the sale of units with extinguished controls, and interest generated by the fees are deposited in a separate interest-bearing affordable housing trust fund account at Fulton Bank for affordable housing purposes. These funds shall be spent in accordance with N.J.A.C. 5:93-8.16 as described in the sections that follow.

## 2. PROJECTION OF REVENUES FROM DEVELOPMENT FEES

East Greenwich Township collects and deposits development fees in accordance with the Township's Development Fee Ordinance. It is anticipated that during the period of 2025 to 2035, which is the period that the Township implements its fourth round compliance, the Township is projected to add an additional **\$1,700,000** to its Affordable Housing Trust Fund. To calculate this fourth round projection of revenue, the following is considered:

### (a) Development fees:

1. Residential and nonresidential projects which have had development fees imposed upon them at the time of preliminary or final development approvals;
2. All projects currently before the planning and zoning boards for development approvals that may apply for building permits and certificates of occupancy; and
3. Future development that is likely to occur based on historical rates of development.

(b) Payment in lieu (PIL): The Township does not currently anticipate the contribution of any payments in lieu toward the municipal Affordable Housing Trust Fund during the fourth round period.

(c) Other funding sources: The Township does not currently anticipate the contribution of any payments in lieu toward the municipal Affordable Housing Trust Fund during the fourth round period.



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- (d) Projected interest: It is estimated that the Township will collect approximately \$60,000.00 in total interest over the next five years.

Source of Funds	Projected Revenues-Housing Trust Fund-2025 Thru 2035						
	2025-26	2027-28	2029-30	2031-32	2032-34	2035	Total
(a) Development fees:							
1. Approved Development	\$350,000	\$250,000	\$75,000	\$25,000	---	---	\$700,000
2. Development Pending Approval	\$250,000	\$200,000	\$50,000	\$75,000	\$25,000	---	\$600,000
3. Projected Development	\$50,000	\$75,000	\$75,000	\$75,000	\$75,000	\$50,000	\$400,000
(b) Payments in Lieu of Construction	---	---	---	---	---	---	---
(c) Other Funds (Specify Source(s))	---	---	---	---	---	---	---
(d) Interest	\$8,000	\$9,000	\$13,000	\$15,000	\$ 8,000	\$ 7,000	\$ 60,000
<b>TOTAL</b>							<b>\$1,700,000</b>

In sum, the Township projects a total of \$1,700,000 in revenue to be collected between June 30, 2025 and December 31, 2035. This projected amount, when added to the current trust fund balance of \$2,299,670.13, results in a total anticipated trust fund balance of \$4,059,670.00 available to fund and administer the Township's affordable housing plan. All interest earned on the account shall be used for only affordable housing purposes.

### 3. ADMINISTRATIVE MECHANISM TO COLLECT AND DISTRIBUTE FUNDS

The following procedural sequence for the collection of development fee revenues shall be followed by the Township:

- (a) Collection of Development Fee Revenues: East Greenwich has identified and authorized Township Clerk and Municipal Housing Liaison, Elizabeth A. McGill, as the administrative entity that will collect and distribute Affordable Housing trust funds collected in accordance with this development fee Spending Plan. Collection of development fee revenues shall be consistent with the Township's Development Fee Ordinance for both residential and non-residential developments in accordance with applicable N. J. State regulations and P.L.2008, c.46, sections 8 (C. 52:27D-329.2) and 32-38 (C. 40:55D-8.1 through 8.8), and as may be amended.



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- (b) Distribution of Development Fee Revenues: Collected revenues will be placed in the Township's Affordable Housing Trust Fund and distributed in accordance with this Spending Plan. Development Fee revenues are distributed under the same procedures for any bill or purchase in the Township. Purchase orders are requested and processed and eventually approved by the Governing Body.

#### 4. DESCRIPTION OF ANTICIPATED USE OF AFFORDABLE HOUSING FUNDS

- (a) Rehabilitation. The Township has a rehabilitation obligation of zero (0) units. In order to address its prior rehabilitation obligation, the Township will continue to participate in the Gloucester County CDBG Home Rehabilitation Program and will set aside funds from the Township's affordable housing trust fund to help fund these programs should additional funding be necessary. The Township will commit an average of \$25,000 per unit, which will require a total contribution of approximately \$250,000.

COAH's rules require municipalities to set aside sufficient funds to address one-third of their rehabilitation obligation within one year of approval of their plan. In addition, municipalities are required to set aside sufficient funds to address one-sixth of their rehabilitation obligation each subsequent year of the substantive certification period. As such, the Township will set aside at least \$40,000 year, and \$50,000 in the final year until the rehabilitation share is addressed.

- (b) Veteran's Housing Project on 290 East Cohawkin Road (Block 1401, Lot 4). The Township has an agreement in place with the developer to contribute \$100,000 toward this project from affordability assistance.
- (c) 100% Affordable Projects: The Township has proposed several 100% affordable projects to be created during the Fourth Round, as listed in the table below. The Township shall set aside a total of \$1,200,000.00 toward funding any gap in financing that these projects may have. Should Thompson Avenue not be developed into a 100% affordable project, the money allocated toward that project will be distributed to the other 100% affordable projects or set aside for future affordable housing purposes. The Township will also utilize affordability assistance funds reserved for very-low-income households to subsidize the construction of VLI units within these 100% affordable projects.
- (d) Market to Affordable Program: The Township will allocate a total of \$766,769 toward purchasing units at Sheriff's sale and converting to units affordable to qualifying households in accordance with the Township's Program Manual.
- (e) Accessory Apartment Program: The Township will allocate a total of \$75,000 toward the subsidy to construct five (5) accessory apartments during the Fourth Round. This will be remitted as a subsidy to applicants willing to create an



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accessory dwelling unit restricted to qualified households in accordance with the Township's Program Manual.

- (f) **Affordability Assistance.** Pursuant to N.J.A.C. 5:93-8.16(c), the Township will commit to spend at least thirty percent (30%) of the revenues collected from development fees, less a rehabilitation program or a new construction project, towards affordability assistance to very low-, low- and moderate-income households. As shown in the table below, the Township projects that approximately \$1,217,901.00 will be available from the affordable housing trust fund for this purpose through December 31, 2035, one-third of which will need to be dedicated toward affordability assistance for very-low income households.

Actual development fees + interest through May 19, 2025		\$2,299,670.13
Development fees + interest projected 2025-2035	+	\$1,760,000.00
Less housing activity expenditures to date	-	---
<b>Total</b>	=	
30% requirement	x 0.30 =	\$1,217,901.00
Less affordability assistance expenditures to date	-	
<b>PROJECTED MINIMUM Affordability Assistance Requirement 2025 - 2035</b>	=	<b>\$1,217,901.00</b>
<b>PROJECTED MINIMUM Very Low-Income Affordability Assistance Requirement 2025 - 2035</b>	÷ 3 =	<b>\$ 365,370.00</b>

- (g) **Administrative Expenses.** Per N.J.A.C. 5:93-8.16(e), no more than twenty percent (20%) of the revenues collected from development fees shall be expended on administration. The Township of East Greenwich projects that a maximum of approximately \$550,000.00 will be available from the affordable housing trust fund to be used for administrative purposes through December 31, 2035. Projected administrative expenditures, subject to the 20% cap, include the salaries and benefits for municipal employees and consultant fees necessary to develop or implement the following:

1. Housing Element and Fair Share Plan, Spending Plan, Site Suitability Studies and all other documents, studies and tasks.
2. Rehabilitation Program.
3. Affirmative Marketing Program.
4. Affordability Assistance Program.



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5. Affordable Housing Monitoring Costs.
6. Planning and engineering review and processing costs, inspections and related to affordable housing projects.

Actual development fees + interest through May 19, 2025		\$2,299,670.00
Development fees + interest projected 2025-2035	+	\$1,760,000.00
<b>Total</b>	=	\$4,059,670.00
20% requirement	x 0.20 =	\$ 750,000.00
Less administrative expenditures through June 31, 2025	-	\$ 200,000.00
<b>PROJECTED MAXIMUM Administrative Expenses Requirement July 1, 2025 - 2035</b>	=	<b>\$ 550,000.00</b>

## 5. EXPENDITURE SCHEDULE

The Township of East Greenwich intends to use affordable housing trust fund revenues for the creation and/or rehabilitation of housing units, affordability assistance, and administration. Where applicable, the funding schedule below parallels the implementation schedule set forth in the Housing Element and Fair Share Plan and is summarized as follows:

<b>East Greenwich Projected Expenditure Schedule 2025 - 2035</b>							
	<b>2025-26</b>	<b>2027-28</b>	<b>2029-30</b>	<b>2031-32</b>	<b>2033-34</b>	<b>2035</b>	<b>Total</b>
Rehabilitation Program	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 50,000	\$ 250,000
South Shore 40/24	\$200,000	\$100,000	\$100,000				\$ 400,000
Thompson Avenue 1704/9	\$400,000						\$ 400,000
Former Pennrose Site		400,000					\$ 400,000
Accessory Dwelling Units/ADU	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000		\$ 75,000
Market to Affordable	127,795	127,795	127,795	127,795	127,795	127,794	766,769
Affordability Assistance	\$217,901	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$1,217,901
Administration	\$100,000	\$ 87,500	\$ 87,500	\$ 87,500	\$ 87,500	\$100,000	\$ 550,000
<b>Total</b>	<b>1,100,696</b>	<b>970,295</b>	<b>570,295</b>	<b>470,295</b>	<b>470,295</b>	<b>477,794</b>	<b>\$4,059,670</b>



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## **6. EXCESS OR SHORTFALL OF FUNDS**

In the event of excess funds, any remaining funds above the amount necessary to satisfy the municipal affordable housing obligation will be dedicated toward its rehabilitation program and/or additional affordable housing activity that occurs during the Fourth Round, or toward Round 5 compliance. In the event that a shortfall of anticipated revenues occurs, the Township will handle the shortfall of funds through an alternative funding source to be identified by the Township, or the Township will amend its Spending Plan to reduce the amount of funds available for the affordability assistance program and administrative expenses.

## **7. SUMMARY**

The Township intends to spend affordable housing trust fund revenues pursuant to N.J.A.C. 5:93-8.16 and consistent with the housing programs outlined in the East Greenwich Township Housing Element and Fair Share Plan. The Township had a balance of \$2,299,670.13 as of year-end, 2019 and projects an additional **\$1,700,000** in revenues through 2025 for a total of \$4,032,170.13. During the period of the Township's Third Round JOR through 2025, at least \$726,000 will be dedicated to affordability assistance and a maximum of \$532,000 will be available to be used towards administrative costs.

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<b>SPENDING PLAN SUMMARY</b>	
Balance as of May 19, 2025	\$ 2,299,670
<b>PROJECTED REVENUE 2025-2035</b>	
Development fees	\$ 1,700,000
Payments in lieu of construction	
Other funds	
Interest	\$ 60,000
<b>SUBTOTAL REVENUE</b>	<b>\$ 1,760,000</b>
<b>BALANCE MAY 19, 2025 + TOTAL REVENUE</b>	<b>\$ 4,059,670</b>
<b>EXPENDITURES</b>	
Rehabilitation Program	\$ 250,000
South Shore	\$ 400,000
Thompson Avenue	\$ 400,000
Former Pennrose Site	\$400,000
Accessory Dwelling Units	\$ 75,000
Market to Affordable	\$ 766,769
Affordability Assistance (30%)	\$ 1,217,901
Administration	\$550,000
<b>TOTAL PROJECTED EXPENDITURES</b>	<b>\$ 4,059,670</b>
<b>REMAINING BALANCE</b>	<b>\$ 0.00</b>



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