

**ELK TOWNSHIP**  
**Gloucester County, New Jersey**



**Housing Element and Fair Share Plan**

**June 2025**

**Amended February 2026**

**Adopted by the Elk Township Combined Planning and Zoning Board  
On June 18, 2025 (Resolution #2025-08)**

**Amended Plan Adopted by the Elk Township Combined Planning and Zoning Board  
On March 2, 2026 (Resolution #2026-10)**

**Endorsed by the Elk Township Committee  
On March 5, 2026 (Resolution #52-2026)**

Steven M. Bach, PE, RA, PP, PLS, CME

Candace A. Kanaplue, AICP, PP

The original of this document was signed and sealed in accordance with NJAC 13:41-1.3.b

 **BACH Associates, PC**  
ENGINEERS • ARCHITECTS • PLANNERS  
304 White Horse Pike, Haddon Heights, NJ 08035  
(856) 546-8611 • Fax (856) 546-8612

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## I. INTRODUCTION

### A. AFFORDABLE HOUSING IN NEW JERSEY

The New Jersey Supreme Court ruled in 1975, in a decision now commonly referred to as “*Mount Laurel I*,” that developing municipalities in New Jersey have a constitutional obligation to provide a realistic opportunity for the construction of low and moderate income housing. Then in 1983 in the “*Mount Laurel II*” decision, the Supreme Court went further, creating an incentive for private developers to enforce the Mount Laurel doctrine by suing municipalities that have not chosen to comply with the *Mount Laurel* principles. Needing a mechanism to implement the *Mount Laurel* doctrine, the legislature adopted the Fair Housing Act (N.J.S.A. 52:27D-310) in 1985, and created the Council on Affordable Housing as the administrative alternative to dealing with affordable housing cases through the courts. COAH was given the responsibility to establish housing regions, estimate low and moderate income housing needs, set criteria for municipalities to determine and address their fair share affordable housing numbers, and review and approve housing elements and fair share plans.

On December 20, 2004, COAH’s first version of the Third Round rules became effective. At that time the Third Round was to cover the time period from 1999 to 2014, since the First and Second Round covered the 1987 to 1999 period. The Third Round affordable housing delivery period was to run from January 1, 2004 through January 1, 2014. After much legal debate on the Third Round Rules, on March 10, 2015, the Supreme Court ruled that the New Jersey Council on Affordable Housing (COAH) failed to act, and as a result, the Courts assumed jurisdiction over municipal compliance with the Mount Laurel doctrine and the Fair Housing Act.

The Township’s Third Round Housing Element and Fair Share Plan was prepared utilizing the Prior Round Rules (N.J.A.C. 5:91 Procedural and N.J.A.C. 5:93 Substantive) as well as the guidance provided in the March 10, 2015 Supreme Court Order and the Township’s January 29, 2018 Settlement Agreement - In the Matter of the Township of Elk, County of Gloucester, Dock No. GLO-L-913-15.

On March 20, 2024, Governor Murphy signed A4/S50 into law ushering in substantial amendments to the New Jersey Fair Housing Act (FHA) and significantly altering the manner in which municipalities will determine their Fourth Round “fair share” obligations, maintain immunity from Mount Laurel lawsuits, respond to objections, and secure approval of their Fourth Round Housing Element and Fair Share Plans. The new affordable housing legislation, A-4 and S-50, establishes processes for calculating municipal housing obligations, compliance filing deadlines, procedures for challenges and dispute resolution mechanisms. The legislation includes considerable amendments to the New Jersey Fair Housing Act and significantly changes the manner in which municipalities will determine their Fourth Round “fair share” obligations, maintain immunity from Mount Laurel lawsuits, respond to objections, and secure approval of their Fourth Round Housing Element and Fair Share Plans.

The amended FHA does the following:

1. Abolishes the Council on Affordable Housing (COAH);
2. Requires the DCA to calculate municipal “fair share” numbers;

3. Establishes a process for municipalities either to accept the DCA's numbers or to determine and substantiate their own present and prospective fair share obligations based on the formulas established in the bill;
4. Creates parameters for fair share plans, such as age-restricted unit maximums, "family-rental" minimums, bonus credit maximums, etc.;
5. Identifies various compliance techniques;
6. Provides criteria for municipalities to secure and maintain Fourth Round "temporary immunity" from exclusionary zoning/builder's remedy lawsuits during the process;
7. Permits interested parties to file formal challenges to the numbers and fair share plans, which will be addressed by the new "Affordable Housing Dispute Resolution Program;"
8. Provides a process for fair share plan approval either through the DCA or the courts via declaratory judgment actions; and
9. Delineates ongoing post-approval municipal monitoring and reporting requirements.

The amended FHA also establishes a series of deadlines for actions to be taken prior to, and after, the beginning of Fourth Round in July of 2025. These are:

*January 31, 2025: Deadline for Towns to adopt their numbers via "Binding Resolution" (with or without using the DCA's numbers) thereby establishing temporary immunity.*

This was completed via Resolution No.33-125, adopted by Township Committee on January 21, 2025 and filed with the Program in a Declaratory Judgment action under the caption, In the Matter of the Elk Township's Determination of Fourth Round Affordable Housing Obligations, Docket No.: GLO-L-104-25 ("DJ Action"). (Appendix 1)

*February 28, 2025: Deadline to challenge the town's Binding Resolution and adopted numbers.*

No challenge was made by Elk Township.

*March 1, 2025: If no challenges are filed by interested parties, the Town's numbers are established by default and immunity remains in effect.*

No challenges were filed by interested parties.

*April 1, 2025: Deadline for the Affordable Housing Dispute Resolution Program ("AHDRP") to settle the number challenge(s).*

Not applicable to Elk Township.

*June 30, 2025: Deadline to adopt and endorse a Housing Element and Fair Share Plan and file with the AHDRP to maintain temporary immunity.*

*July 1, 2025: First day of Fourth Round*

*August 31, 2025: Deadline to challenge the validity of a Town's Housing Element and Fair Share Plan.*

*December 31, 2025: Deadline for the Town to settle the challenge or provide an explanation as to why it will not make all, or some of the requested changes, or both.*

*March 15, 2026: Deadline for the Fourth Round of affordable housing obligations, the implementing ordinances and resolutions, proposed, and incorporating any changes from the program, shall be adopted. Failure to meet the March 15 deadline shall result in the municipality losing immunity from exclusionary zoning litigation.*

It is noted that the Mayor and Committee of Elk Township adopted Resolution No.81-2025: Resolution of the Mayor and Committee of the Township of Elk Directing the Combined Planning and Zoning Board of Adjustment to Prepare a Housing Element and Fair Share Plan and Spending Plan to Address the Township of Elk's 4<sup>th</sup> Round Affordable Housing Obligations (Appendix 2).

## **B. HOUSING ELEMENT AND FAIR SHARE PLAN REQUIREMENTS**

The Township must prepare and submit both a Housing Element (an element of Master Plan) and Fair Share Plan (describing how the Township will address the obligation). The requirements of the Housing Element are outlined below (N.J.A.C. 5:97-2.1, 2.3 and N.J.S.A. 52:27D-310).

The Housing Element must review and analyze the Township's housing stock, demographic and employment characteristics, leading into the Fair Share Plan, which will demonstrate how the Township will endeavor to provide for its Fair Share obligation. The Housing Element must provide an analysis demonstrating that the plan will provide a realistic opportunity to meet the housing Township's obligations and identify which ordinances must be revised to incorporate the provisions for low and moderate income housing. A municipality's housing element must be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low and moderate income housing.

### **1. Housing Element Requirements under the Fair Housing Act:**

- 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, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;
- 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; and
- 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.

**C. MUNICIPAL SUMMARY**

The land area of Elk Township is 19.69 square miles or approximately 12,366 acres and is located in south central Gloucester County. Elk Township is bordered by Harrison Township and Glassboro Borough to the north, Clayton Borough and Franklin Township to the east, Upper Pittsgrove Township to the south and South Harrison Township to the west.

The 2023 population estimate for Elk is 4,426 persons based on 2023 U.S. Census Bureau data population estimate.

**D. FAIR SHARE OBLIGATIONS**

**1. Prior Round (1987-1999) and Third Round (1999-2025) Obligations**

As a result of the Township's January 29, 2018 Settlement Agreement - In the Matter of the Township of Elk, County of Gloucester, Dock No. GLO-L-913-15, the Township's affordable housing obligation was determined to be:

Elk Township Affordable Housing Obligations 1987-2025 (January 29, 2018 Settlement Agreement)	
Rehabilitation (Present Need 2015)	9
Prior Round (1987 – 1999)	127
Third Round (Prospective Need 1999-2025)	282

## 2. Fourth Round Obligations (2025-2035)

Under the Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background as issued by the New Jersey Department of Community Affairs (NJDCA), the Township's Fourth Round (2025-2035) obligations are:

Elk Township Affordable Housing Obligations (NJDCA)	
Rehabilitation (Present Need 2025)	17
Fourth Round (Prospective Need 2025-2035)	214

## E. AFFORDABLE HOUSING HISTORY

A Summary of Elk's historic affordable housing timeline is provided below:

### First and Second Round

The Township of Elk's first round participation may be summarized as follows:

1. On February 9, 1990 Elk Township submitted a Round I Housing Element and Fair Share Plan to the Council on Affordable Housing. The Round 1 obligation consisted of 29 rehabilitations and 92 new units.
2. On December 4, 1991 COAH issued Administrative Order No. 8, which required Elk Township to complete and submit certain information within 60 days. The Township complied with the requirements as confirmed by the COAH review report dated December 9, 1992.
3. The Housing Element was amended by the Planning Board on April 2, 1992 and the Township Committee re-petitioned COAH for substantive certification on April 2, 1992.
4. On February 3, 1993 Elk received substantive certification of its Round I Housing Element and Fair Share Plan (HEFSP). It was determined by COAH that wastewater treatment capacity in Elk constituted a scarce resource (since only 250,000 gpd had been allocated), and thereby approved a durational adjustment, which was to remain in effect until adequate wastewater treatment capacity becomes available to serve the inclusionary housing site. Certification expired in 1999.
5. Elk Township's cumulative Rounds I and II new construction obligation for the period of 1987 through 1999 was 127.
6. The Housing Element and Fair Share Plan were readopted on January 21, 1999 with a resolution indicating that the existing inclusionary zoning continued to provide a realistic opportunity for the cumulative Rounds I and II obligation. Township Committee adopted a resolution on February 4, 1999 endorsing the HEFSP, and filed the Plan with COAH, but there was no petition for certification (required within 2 years of filing).

### **Third Round**

COAH first proposed third round substantive and procedural rules in October, 2003. 35 N.J.R. 4636(a); 35 N.J.R. 4700(a). Those rules remained un-adopted and COAH re-proposed both the substantive and procedural third round rules (N.J.A.C. 5:94 and 5:95) in August of 2004 and adopted the same effective on December 20, 2004. (the "2004 Regulations")

The Township of Elk's third round participation may be summarized as follows:

1. On November 10, 2005 the Planning Board adopted a new Housing Element and Fair Share Plan responding to the first iteration of the Round III COAH rules (resolution 2005-36). The Round III HEFSP was endorsed by Township Committee on November 14, 2005 (resolution 128-2005), and was submitted to COAH on November 29, 2005.
2. On May 27, 2007 COAH provided the Township with a preliminary review. The Township and COAH staff corresponded via phone and email. The Township formally responded with supplementary information on September 13, 2007. At that time COAH was not in a position to grant substantive certification because a January 2007 Court decision had already required COAH to reexamine the Round III methodology and propose revised rules.
3. COAH adopted new Round III rules in June of 2008, which became effective on October 20, 2008.
4. On December 17, 2008 Elk Planning Board adopted a new Housing Element and Fair Share Plan that addressed the cumulative Rounds I, II, and III obligations. The HEFSP was endorsed by Township Committee on December 18, 2008 and submitted to COAH on December 30, 2008. No objections were filed.
5. Elk's HEFSP was deemed complete by COAH on March 4, 2009.
6. Elk's updated Mandatory Development Fee Ordinance was approved by COAH on March 26, 2009 and was adopted by Ordinance 2009-4 on April 20, 2009.
7. Township staff and professionals corresponded informally with COAH staff through 2009 and early 2010.
8. On April 29, 2010 Elk representatives met with COAH Director Sean Thompson and COAH planner Dennis Funaro to discuss the status of their review and some of the complexities in Elk's plan (infrastructure issues and agreements among developers).
9. On August 9, 2010 COAH issued a report and requested additional information. The deadline to respond was October 8, 2010. On September 29, 2010 the Township was granted a 90 day extension to respond to the request for additional information (until January 6, 2011).
10. On October 8, 2010 the Appellate Division invalidated the Round III methodology.

11. It didn't appear prudent to continue down the path with COAH until there was some certainty about the Round III rules. On December 28, 2010 the Township requested an extension/stay through June 2011. A response to this request was not received.
12. In November 2011 the Planning Board's affordable housing subcommittee met to discuss the status of the Fair Share Plan and the inclusionary aspects of the Silvergate Planned Unit Development project in particular.
13. Since 2011, though the formal COAH review process stalled, the Township has continued to work with developers to ensure the continued viability of inclusionary housing opportunities.
14. Despite the efforts of several developers to plan for and develop residential and commercial space in the eastern portion of Elk Township (within the Route 55 corridor), growth in Elk Township has been slow (the population in 1990 was 3,806; the population in 2010 was 4,216; and the 2014 estimate was 4,234). Elk Township has maintained opportunities for the inclusion of affordable units along with market rate development opportunities.
15. On March 3, 2016, Township representatives participated in a Court mediation with representatives of Fair Share Housing.
16. On April 13, 2016, the Township Combined Planning and Zoning Board adopted the Elk Township, Gloucester County, New Jersey – Housing Element and Fair Share, Revised April 5, 2018.
17. Negotiations continued through 2017 and in January 2018 all parties agreed on the terms of a settlement on January 29, 2018.
18. January 29, 2018 Settlement Agreement - In the Matter of the Township of Elk, County of Gloucester, Dock No. GLO-L-913-15.
19. January 25, 2025 Final Judgment of Compliance of Repose – In the Matter of the Application of the Township of Elk, County of Gloucester, Docket No. GLO-000913-15.

## II. HOUSING ELEMENT ANALYSIS

### A. EXISTING HOUSING STOCK

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, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards.

According to the Census estimate, in 2023 there were 1,560 year-round housing units in Elk, of which 1,416 were occupied and 144 were vacant, in 2023 the vacancy rate of was 0 for homeowners and 0% for rentals.

#### 1. Age of Housing Stock

The Elk Township housing stock is older than the majority of the County stock and the number of persons per household is slightly larger than that of the county.

	Persons Per Household 2023	% Housing Stock Built 1939 or Earlier
Elk Township	3.07	13.2
Gloucester County	2.67	9.8

Source: U.S. Census Bureau, 2023 ACS

Elk Township Age of Housing Stock		
Year Constructed	Number of units	Percent of Total in Year 2023
2020 or later	11	1560
2010-2019	201	0.7
2000 to 2009	351	12.9
1990 to 1999	89	22.5
1980 to 1989	168	5.7
1970 to 1979	158	10.8
1960 to 1969	278	10.1
1950 to 1959	82	17.8
1940 to 1949	16	5.3
1939 or earlier	206	1.0

According to the residential building permit data from the New Jersey Department of Community Affairs, 2 residential certificates of occupancy were issued in 2023 in the Elk Township.

#### 2. Condition and Substandard Units

Of the 1,416 housing units in existence estimated by the 2023 American Community Survey, zero (0) units were reported to be without complete plumbing facilities and zero (0) units were lacking complete kitchen facilities. There are 21 units within the Township that have more than one (1) occupants per room. An assessment of the number of substandard units capable of

being rehabilitated may be made by considering the number of homes without complete plumbing and kitchen facilities since this information is provided in the Census sample data, but there are other factors to consider as well. Occupied housing units with a low market value relative to the average in the area may be an indicator of potential for rehabilitation. COAH has also used “crowding” and the age of the housing units to estimate the number of units in need of rehabilitation. There are surely at least a few units that are in need of rehabilitation, within the Township.

The table below presents a breakdown of the Township’s housing stock by number of rooms as they relate to County averages. The Township has a higher percentage of homes with more than six rooms than Gloucester County overall, with the median number of rooms in the Township at 7.0 per housing unit.

Elk Township Number of Rooms in Housing Units			
Elk # of Rooms	Elk # of Units	Elk %	Gloucester County %
1	0	0	1
2	0	0	1.2
3	25	1.6	5.8
4	36	2.3	10.4
5	368	23.6	13.2
6+	1131	72.5	68.4
Median for Elk	7.0 rooms		6.6 rooms

### 3. Ownership and Rental Characteristics

A majority, 88.1 percent, of Elk’s population live in owner occupied housing units, while 11.9 percent of the population lived in rented housing units according to the 2023 ACS. 90 percent of the total housing units in Elk Township are single family dwellings (rented and owned), 10 percent are mobile homes.

Year Round Housing Units			Owner-occupied		Rental	
Occupied	Vacant	Total	No.	%	No.	%
1,416	144	1,560	1,247	88.1	169	11.9

### 4. Occupancy Characteristics and Housing Type

The vacancy rate for year round units is low in the Township, 0% vacancy for owner-occupied units and 0% vacancy for rental units. The average household size in the Township is 3.13 persons per owner occupied units and 2.63 for renter occupied units.

The number of bedrooms in a home is often reflective of the size of a home. The municipalities with a newer housing stock, have a larger percentage of units with more bedrooms. This is reflective of the trend toward larger, more sprawling homes in America over the last several decades. Elk has an older stock of homes and therefore lends itself to a larger percentage of homes with two to three bedrooms.

	Bedroom Distribution Percent of Housing Stock With:		
	One or less Bedrooms	2 - 3 Bedrooms	4+ Bedrooms
Elk Township	3.9%	56.2%	39.9%
Gloucester County	8.7	60	31.3

Source: U.S. Census Bureau, 2023 ACS

Percent Distribution of Housing Units by Structure Type Elk Township		
	Number of units	Percentage
1 (detached)	1378	88.3
1 (attached)	26	1.7
2	0	0
3-4	0	0
5-9	0	0
10-19	0	0
20+	0	0
Mobile	156	10
Other	0	0
Total	1560	100

Source: U.S. Census Bureau, 2023 ACS

Selected Housing or Housing-Related Value Characteristics				
	Median Value Housing	Median Contract Rent	Median Household Income	Rental Vacancy Rate (%)
Elk Township	\$320,100	\$1,181	\$97,474	0%

Source: U.S. Census Bureau, ACS 2023 5 Year Estimate

**B. DEMOGRAPHIC CHARACTERISTICS**

According to the 2010 US Census, between 2000 and 2014, Elk’s population began to increase. The population estimate as of 2023 is 4,426 people, a 26% increase since 2000.

**1. Historic Population Trends**

Elk Township’s population increased consistently since the 1940’s, with a slight dip between 1990 and 2000, from 1,656 people in 1940 to 4,246 people in 2023. The US Census estimates an increase of 5% between 2010 and 2023. The table below shows the population changes from 1940 through 2023.

Elk Township, Gloucester County Population									
1940	1950	1960	1970	1980	1990	2000	2010	2020	2023*
1,656	2,074	2,635	2,707	3,187	3,806	3,514	4,216	4,424	4,426

Table 6. New Jersey Resident Population by Municipality 1930-1990; \* US Census, estimate

**2. Recent Population Change**

Between 2010 and 2023, the population in Elk increased from 4,216 to 4,426, an increase of 210 people or 5%.

**3. Population Density**

In 2023, the population density in Elk Township was estimated to be 224.78 people per square mile, which is significantly less than Gloucester County’s and State’s population density overall.

Elk Township and Surrounding Municipalities Density Indicators			
	Square Miles	Population per sq mile	Housing units per sq mile
Elk	19.69	224.78	79.23
Gloucester County	337.18	903.09	348.57
New Jersey	8,722.58	1,062.42	432.88

Source: Calculated from U.S. Census Bureau, 2023 ACS

**4. Age of Population**

The table below provides a breakdown of Elk’s population by age cohorts and gender in 2023. The largest age cohort is the 45-54 years of age bracket, with 19.6% of the total population. This is consistent with the Township’s median age of 44.4 years. The second largest age cohort is the 5-14 range with 16.2% of the population. With the highest age cohorts being 45-64, over 30% of the population, this indicates that the over 65 population will continue to grow, assuming that the older residents chose to stay in Elk as they reach retirement age.

Elk Township Summary Population Characteristics 2023		
	Number of People	% of Total
Male	2,215	50
Female	2,111	50
Total	4,426	100.0
Under 5	138	3.1
5 - 14	716	16.2
15 - 24	525	11.9
25 - 34	272	6.1
35 - 44	645	14.6
45 - 54	868	19.6
55 - 64	558	12.6
65+	704	15.9
Median Age	44.4	N/A

Source: U.S. Census Bureau, 2023 ACS

## 5. Household Characteristics

The next table includes family and household characteristics of the Township. In 2023, there were 1,416 households and 1,165 families in Elk with an average of 3.07 persons per household. The table below indicates that Elk is comprised of a majority of married/ couple family households (63.3%) with the second largest household type being householders living alone at 11% .

	Number of Households	Percent
Family Households	1,165	82.3
Married Couple Family	897	63.3
Male Householder, no spouse	100	7.1
Female householder, no spouse	168	11.9
Non Family Households	251	17.7
Householder living alone	156	11
Householder not living alone	95	6.7
Total Households	1,416	100

Source: U.S. Census Bureau, 2023 ACS

## 6. Income Level & Poverty Status

Elk has higher percentages of households in higher income brackets than the County overall. The Township had an estimated 2023 household median income of \$144,470, compared with the Gloucester County household median income of \$102,807. 0.4% percent of Elk's families had household incomes below the federal poverty level.

Regulations define low income (those earning up to 50% of the median household income for the region) and moderate income households (those earning from more than 50% to 80% of the median household income for the region). The figures are adjusted for household size and the municipality's geographic location since cost of living differs among regions.

Elk is located within Region Five, which includes Camden, Gloucester and Burlington Counties. The 2025 income guidelines for Region Five (based on household size) range from \$66,880 (one person household) to \$95,520 (four person household) for the upper limits of what is considered moderate income; and \$41,800 (one person household) to \$78,850 (eight person household) for the upper limit of what is considered low income. Median income for the region ranges from \$83,600 to \$157,700.

Elk Township 2023 Household Income						
	Elk Township		Gloucester County		New Jersey	
	Households	Elk %	Households	Gloucester County %	Households	State %
Less than \$10,000	14	1	3,591	3.2	140,262	4
10,000 - 14,999	18	1.3	2,279	2.0	99,362	2.9
15,000 - 24,999	26	1.8	2,449	2.2	82,366	2.4
25,000 - 34,999	28	2.0	2,820	2.5	93,036	2.7
35,000 - 49,999	57	4.0	5,659	5.1	184,753	5.3
50,000 - 74,999	52	3.7	8,409	7.5	276,601	8.0
75,000 - 99,999	131	9.3	15,720	14.1	448,192	12.9
100,000 - 149,999	163	11.5	13,305	11.9	397,939	11.4
50,000 - 199,999	229	16.2	22,593	20.2	627,526	18.0
200,000+	698	49.3	34,971	31.3	1,128,318	32.4

Source: U.S. Census Bureau, 2023 American Community Survey 5-year Estimates

Elk Township 2023 Income Levels			
	Elk Township	Gloucester County	New Jersey
Median Household Income	\$144,470	\$102,807	\$101,050
Median Family Income	\$179,087	\$127,695	\$123,892
Poverty Status (Percent of people)	3.8	7.6	9.8
Poverty Status (Percent of families)	0.4	5.6	7.1

Source: U.S. Census Bureau, 20123 American Community Survey 5-year Estimates

## 7. Employment Status of Residents

Of the 3,514 estimated residents aged sixteen and over in 2023, 2,192 were estimated to be in the labor force (62.4%). 4.2 percent of the labor force were estimated to be unemployed in 2023 (148). The mean travel time to work for Township residents is 28.1 minutes.

The employment data included in the US Census for the Elk Township residents provides a picture of what types of work Township residents are involved in, but does not indicate where those jobs are located. As indicated in the table below, the most significant employment activities of the employed residents are Educational, Health and Social Services with 23.4%, and Retail Trade with 16.3%.

Industry Code	Elk	
	Jobs	%
1 Agriculture, Forestry, Fisheries & Mining	19	0.9
2 Construction	166	8.1
3 Manufacturing	202	9.9
4 Wholesale Trade	123	6.0
5 Retail Trade	334	16.3
6 Transportation, Warehousing, Utilities	118	5.8
7 Information	57	2.8
8 Finance, Insurance, Real Estate, Rental	116	5.7
9 Prof., Sci., Mgmt., Admin Services	167	8.2
10 Educ. Health, Social Services	479	23.4
11 Arts, Entertainment, Recreation, Food	74	3.6
12 Other Services	48	2.3
13 Public Administration	141	6.9

Source: U.S. Census Bureau, 2023 ACS

Employment of Elk Residents			
	# Persons	% ET	% Gloucester County
Management, Professional. & Related	1,002	49.0	45.3
Service	211	10.3	13.4
Sales and Office	366	17.9	22.0
Natural resources, Construction & Maintenance	190	9.3	8.1
Production, Transp. & Material Moving	275	13.5	11.1
Total	2,044	100	100

Source: U.S. Census Bureau, 2023 Census

### C. EMPLOYMENT

#### 1. Employment Trends and Outlook

The Delaware Valley Regional Planning Commission publishes employment projections. Employment in Elk Township is expected to rise through 2050, with 15% increase.

Elk Township, DVRPC Projected Employment								
Year	2020	2025	2030	2035	2040	2050	Change 2025-50	% change
Projected Employment	1230	1527	1501	1489	1552	1751	224	15

Source: DVRPC 2040 Employment Forecasts, 2020-2050

### D. PROJECTED HOUSING STOCK

Residential growth in Elk has been stagnant since 2009 through 2023

Historic Trend of Certificates of Occupancy and Demolition Permits															
	'09	'10	'11	'12	'13	'14	'15	'16	'17	'18	'19	'20	'21	'22	'23
COs Issued	2	1	0	1	0	0	3	26	19	11	0	0	3	2	2
Demolitions	0	0	0	1	0	0	2	7	9	5	4	2	2	0	0
Net	2	1	0	0	0	0	1	19	10	6	-4	-2	1	2	2

Source: New Jersey Construction Reporter and Municipal construction office records

### E. FAIR SHARE CAPACITY

#### 1. Land Capacity / Availability of Existing and Planned Infrastructure

Elk Township is comprised of the following diverse State Planning Areas: PA 2 Suburban, PA 3 Fringe, PA 4 Rural, PA 4B Rural Environmental Sensitive, PA 5 Environmentally Sensitive, and Park.

When there is a lack of sufficient land to meet the new construction obligation, a municipality is entitled to rely on NJAC 5:93 to adjust the new construction obligation downward. The adjusted number is known as the realistic development potential (RDP). The RDP represents the portion of the new construction affordable housing obligation that can theoretically be addressed with inclusionary development (defined as a mix of market and affordable units) on lots identified as being suitable in the Vacant Land Analysis (“VLA”). The portion of the new construction obligation for which there is insufficient land is known as the “unmet need”. The unmet need is calculated as the difference between the total new construction obligation and the RDP.

The Township performed a Vacant Land Analysis (VLA) entitled Elk Township, Gloucester County, New Jersey – Vacant Land Analysis, Amended February 2026 which is included by reference into this Housing Element and Fair Share Plan. The referenced VLA resulted in the identification of 86 areas of vacant property which can potentially be serviced by public water and sewer within the period of certification (2025-2035) and can accommodate the minimum presumptive density of 6 du / acre for inclusionary affordable development. The Realistic Development Potential (RDP) for inclusionary affordable units was calculated as 57 units.

In addition, when a community has sufficient land area to accommodate the minimum presumptive density of minimum density of 6 du / acre for inclusionary affordable development, but insufficient water and/or sewer to support inclusionary development, the vacant parcels available for inclusionary development shall be reviewed to determine if it is realistic for the site to receive the required water and sewer during the period of certification (2025 to 2035). The 86 parcels that compromise the Realistic Development Potential calculation of 57 units as delineated above are within the sewer service area as delineated on the Elk Township Water Quality Management Plan map “Sewer Service Area Map (Churchill Consulting Engineers, PC) last revised 5/23/12 was included as Appendix 8 of the referenced Vacant Land Analysis, dated February 2026.

The Township claims a Durational Adjustment for all other vacant parcels that have sufficient land area to accommodate the minimum presumptive density of minimum density of 6 du / acre for inclusionary affordable development but are not in the reference sewer service area.

### **III. FAIR SHARE PLAN**

#### **A. CONTENTS OF A FAIR SHARE PLAN**

The Fair Share Plan contains the following information:

- Description of existing credits intended to satisfy the obligation;
- Description of mechanisms that will be used to meet any outstanding obligation; and
- An implementation schedule that sets forth a detailed timetable for units to be provided.

In adopting its housing element, a municipality may provide for its fair share of low and moderate income housing by means of any technique or combination of techniques that provide a realistic opportunity for the provision of the fair share. As per N.J.A.C. 5:93, these potential techniques include but are not limited to:

- Rehabilitation of existing substandard housing units;
- ECHO units (as a Rehabilitation credit);
- Municipally-sponsored and 100% affordable developments;
- Zoning for inclusionary development;
- Alternative living arrangements;
- Accessory apartment program;
- Purchase of existing homes;
- Write-down/buy-down programs; and
- Assisted living residences.

#### **B. REGIONAL INCOME LIMITS**

Dwelling units are affordable to low and moderate income households if the maximum sales price or rental cost is within their ability to pay such costs, based on a specific formula. The State provides income limits based upon the median gross household income of the affordable housing region in which the household is located. A moderate income household is one with a gross household income equal to or more than 50%, but less than 80%, of the median gross regional household income. A low income household is one with a gross household income equal to 50% or less of the median gross regional household income. Very-low income households are those with a gross household income equal to 30% or less of the median gross household income. Elk is located in Region 5, which contains Burlington, Camden, and Gloucester Counties.

Using the 2025 regional income limits, a four-person household moderate income is capped at \$95,520. Two-person households could make up to \$76,480 and be considered a moderate income household or earn up to \$47,800 and be considered a low income household. See the table on the following page for greater detail.

2025 REGIONAL INCOME LIMITS FOR REGION 5				
	1 Person	2 Person	3 Person	4 Person
Median	\$83,600.00	\$95,600.00	\$107,500.00	\$119,400.00
Moderate	\$66,880.00	\$76,480.00	\$86,000.00	\$95,520.00
Low	\$41,800.00	\$47,800.00	\$53,750.00	\$59,700.00
Very Low	\$25,080.00	\$28,680.00	\$32,250.00	\$35,820.00

Source: UHAC 2025 Affordable Housing Regional Income Limits by Household Size

### C. REHABILITATION OBLIGATION COMPLIANCE

The Opinion issued by the Supreme Court of New Jersey on March 10, 2015 states that “the Appellate Division also approved a methodology for identifying substandard housing that used fewer surrogates [or indicators] to approximate the number of deficient or dilapidated housing units”. The Order states that three indicators was not an abuse of discretion. The three indicators utilized are old and over-crowded units, homes with incomplete plumbing and housing units with incomplete kitchens.

Pursuant to the “NJCA Affordable Housing Obligations for 2025-2035 (Fourth Round Methodology and Background)”, the Township has a rehabilitation requirement of 17 which will be addressed through funds in the Affordable Housing Trust Fund and through continued participation in Gloucester County’s rehabilitation program, which is administered with the use of CDBG and HOME funds and utilizing the Township’s Affordable Housing Trust Fund.

N.J.A.C. 5:93-5.2(g) and (h) requires \$10,000 to be spent per unit and a six-year control on affordability for owner-occupied units. Rental units are required to have ten-year controls on affordability. Additionally a major system must be repaired in order for a home to qualify as a credit. Section II of this report indicates the condition of houses from the most recently available census data.

- 1 The rules specifically require a minimum of \$2,000 per unit to be spent on administration and \$8,000 per unit to be spent on the rehabilitation activity, which totals at least \$10,000.
- 2 A major system is defined by N.J.A.C. 5:93-5.2(b) as weatherization, a roof, plumbing (including wells), heating, electricity, sanitary plumbing (including septic systems) and/or a load bearing structural system.

**D. SUMMARY OF PRIOR, THIRD, AND FOURTH ROUND OBLIGATIONS (1987 – 2035)**

Elk Township Affordable Housing Obligations 1987-2035	
Rehabilitation (Present Need 2025)	17
Prior Round (1987 – 1999)	127
Third Round (Prospective Need 1999-2025)	282
Fourth Round (Prospective Need 2025-2035)	214

**E. SUMMARY OF AFFORDABLE HOUSING DEVELOPMENT**

The following is a summary of affordable housing units currently constructed or planned to be constructed within the compliance period (2025-2035):

1. Silvergate Phase 4: 50 affordable family rental units under the Villages at Still Run Redevelopment Area (formerly Silvergate General Development Plan). It is noted Villages at Still Run Redevelopment Area currently is projected to have a total of 150 affordable units and 999 market rates units.
2. Silvergate Phase 6: 100 affordable family rental units the Villages at Still Run Redevelopment Area (formerly Silvergate General Development Plan). It is noted Villages at Still Run Redevelopment Area currently is projected to have a total of 150 affordable units and 999 market rates units.
3. Aura 1: 218 unit planned and approved development and by the "conversion law" all units are family for sale or rental. 44 affordable family units are required as part of the overall development. Per the conditions of the Elk Township Combined Planning and Zoning Board, the affordable housing units for Aura I must be constructed as part of the Aura II development.
4. Aura 2 (Formerly Part of Latham Park): A planned 121 unit development. 8 affordable family for sale or rental units were originally approved for this development with these 8 units will be built in conjunction with the Aura I affordable units. The Township land use approvals for this development have expired. The owner of the development is currently working towards revesting of Township land use and outside agency approvals. It is understood that a 20% affordable set aside will be required for revesting of Township land use approvals which would result in an additional 16 affordable units. This would result in a total of 24 inclusionary affordable family for sale or rental units.
5. Aura 3 (formerly part of Latham Park): In December 2024 the Elk Township Combined Planning and Zoning Board granted Preliminary and Final Major Subdivision and Preliminary and Final Site Plan review for approval of the construction of 962 residential housing units consisting of 685 single-family age-restricted units and 276 multi-family residential units. The development is divided into three (3) sections, The Willows, The Carriages and The Reeds. The Willows at Orchard Glen consist of 186 single family age-restricted detached dwellings. The Carriages at Orchard Glen consist of 250 active adult single family detached dwellings and 250 active adult twin dwellings (34 of which

are affordable). The Reeds Apartments are garden style apartments that consist of 276 units (76 of which are affordable).

6. 416 Ewan Rd., Robins Nest. Existing supportive needs group home.
7. 125 Daylight Dr., Kelsch Homes. Existing supportive needs group home.
8. 148 Iredell Land, ARC. Existing supportive needs group home.
9. 311 Elk Road, Wounded Warriors. Existing supportive needs group home.
10. 685 Aura Rd., Scioto Properties. Existing supportive needs group home.
11. 355 Union Street, Volunteers of America. Existing supportive needs group home.
12. 103 28th Ave, Scioto Properties. Existing supportive needs group home.
13. 414 Whig Lane Kelsch Homes, Existing supportive needs group home.

**F. PRIOR ROUND OBLIGATION COMPLIANCE (1987 - 1999)**

The Township had a Prior Round obligation of 127 units and satisfied this obligation utilizing 95 of the 100 affordable family rental units of Silvergate Phase 6 planned under the Villages at Still Run Redevelopment Area (formerly Silvergate General Development Plan). Also a total of 32 associated bonus credits were claimed. This resulted in a total of 127 credits to satisfy the prior round obligation in accordance with the January 9, 2018 Settlement Agreement.

Name of Project	Type	Units	Bonus Credits	Total
Silvergate Phase 6	Family Rental	95	32	127

Round 3 Testing Requirements:

Min rental obligation  $0.25 \times 127 = 32$                       Provided 95

Max senior  $0.25 \times 127 = 32$                                       Provided 0

Max bonus  $0.25 \times 127 = 32$                                       Provided 32

**G. THIRD ROUND OBLIGATION COMPLIANCE (1999 - 2025)**

The Township had a third round obligation of 282 units and satisfied this obligation per the following:

1. Silvergate Phase 4: 50 affordable family rental units under the Villages at Still Run Redevelopment Area (formerly Silvergate General Development Plan). It is noted Villages at Still Run Redevelopment Area currently is projected to have a total of 150

affordable units and 999 market rates units. Credit taken for 50 affordable family rental units and 50 bonus credits for a total of 100 credits.

2. Aura 1: 44 affordable units. 218 unit planned and approved development and by the "conversion law" all units are family for sale or rental. 44 affordable family units are required as part of the overall development. Per the conditions of the Elk Township Combined Planning and Zoning Board, the affordable housing units for Aura I must be constructed as part of the Aura II development. Credit taken for 44 affordable family for sale or rental units.
3. Aura 2 (Formerly Part of Latham Park): 8 affordable family for sale or rental units. These units will be built in conjunction with the Aura I affordable units. Credit taken for 8 affordable family for sale or rental units.
4. Aura 3 (formerly part of Latham Park): In December 2024 the Elk Township Combined Planning and Zoning Board granted Preliminary and Final Major Subdivision and Preliminary and Final Site Plan review for approval of the construction of 962 residential housing units consisting of 685 single-family age-restricted units and 276 multi-family residential units. The development is divided into three (3) sections, The Willows, The Carriages and The Reeds. The Willows at Orchard Glen consist of 186 single family age-restricted detached dwellings. The Carriages at Orchard Glen consist of 250 active adult single family detached dwellings and 250 active adult twin dwellings (34 of which are affordable). The Reeds Apartments are garden style apartments that consist of 276 units (76 of which are affordable). Credit taken for 34 affordable senior for sale units. Credit also taken for 52 of the 76 affordable family rental units and associated 21 bonus credits.
5. 125 Daylight Dr., Kelsch Homes. Existing supportive needs group home. Credit taken for 5 beds.
6. 685 Aura Rd., Scioto Properties. Existing supportive needs group home. Credit taken for 4 beds.
7. 355 Union Street, Volunteers of America. Existing supportive needs group home. Credit taken for 7 beds.
8. 103 28th Ave, Scioto Properties. Existing supportive needs group home. Credit taken for 3 beds.
9. 414 Whig Lane Kelsch Homes, Existing supportive needs group home. Credit taken for 4 beds.

Name of Project	Type	Units	Bonus Credits	Total
Silvergate Phase 4	Family Rental	50	50	100
Aura 1	Family for-sale or rental	44		44
Aura 2	Family for-sale or rental	8		8
Aura 3	Senior for sale	34		34
Aura 3	Family Rental	52	21	73
125 Daylight Dr. Kelsch Homes	Group home	5		5
685 Aura Rd. Scioto Properties	Group home	4		4
355 Union Street Volunteers of America	Group home	7		7
103 Twenty-Eight Ave Scioto Properties	Group home	3		3
414 Whig Lane – Kelsch Homes	Group home	4		4
<b>TOTAL</b>		<b>211</b>	<b>71</b>	<b>282</b>

The above provides 211 units and 71 bonus credits for a total of 282 credits.

Round 3 Testing Requirements:

Min rental obligation  $0.25 \times 282 = 71$                       Provided 102

Max senior  $0.25 \times 282 = 71$                                       Provided 34

Max bonus  $0.25 \times 282 = 71$                                       Provided 71

#### **H. FOURTH ROUND OBLIGATION COMPLIANCE (2025 - 2035)**

The Township has a fourth round obligation of 214 units. As indicated in section E. FAIR SHARE CAPACITY, the Township has a calculated Realistic Development Potential (RDP) of 57 units and a calculated Unmet Need of 157 units.

**Satisfaction of Realistic Development Potential (RDP) Requirement:**

To satisfy the 57 unit RDP, the Township will utilize the following:

Name of Project	Type	Units	Bonus Credits	Total
Silvergate Phase VI	Family Rental	5		5
Aura 3	Family Rental	24		24
416 Ewan Rd. Robins Nest	Group home	4	4	8
148 Iredell Lane ARC	Group home	4	4	8
311 Elk Road Wounded Warriors	Group home	7	7	14
<b>TOTAL</b>		<b>44</b>	<b>15</b>	<b>59</b>

**Round 4 Testing Requirements:**

**Maximum Bonus:**

Allowed: 25% of 57 for 15 units  
 Taken: 15 credits

**Maximum Senior:**

Allowed: 30% (excluding bonus credits) of 57 for 17 units  
 Provided: 0 units

**Minimum Family:**

Required: 50% of 57 units for 29 units  
 Provided: 29 units

**Minimum Rental:**

Required: 25% of 57 for 15 units  
 Provided: 29 units

**Minimum Family Rental:**

Required: 50% of minimum rental for 8 units  
 Provided: 29 units

Minimum Very Low Income:

Required: 13% of 30 low and moderate for 4 units  
 Provided: 4

### **Unmet Need**

The Township has calculated unmet need of 157 units. The Township has the following credits towards this unmet need.

1. Aura 2 (Formerly Part of Latham Park): A planned 121 unit development. 8 affordable family for sale or rental units were originally approved for this development with these 8 units will be built in conjunction with the Aura I affordable units. The Township land use approvals for this development have expired. The owner of the development is currently working towards revesting of Township land use and outside agency approvals. It is understood that a 20% affordable set aside will be required for revesting of Township land use approvals which would result in an additional 16 affordable units. This would result in a total of 24 inclusionary affordable family for sale or rental units.

### **25% Adjusted Prospective Need Requirement**

The amended Fair Housing Act requires a municipality that receives an adjustment of their prospective need to identify sufficient parcels that are likely to develop during the Fourth Round to address 25 percent of their adjusted prospective unmet need with realistic or meaningful zoning.

The Township's unmet need is 157 units (214 obligation - 57 RDP). Therefore, the Township is required to identify sufficient parcels that are likely to develop during the Fourth Round to address 40 affordable units (157 units x 25% = 40 units).

The Township will be utilizing the remaining 16 units from the Aura 2 development which were not allocated to any rounds above.

In addition, the Township has identified two (2) areas that are likely to develop during the Fourth Round. These areas are currently in the Aura III Redevelopment Area. The Township has consulted with DR Horton as the contract redeveloper for the Aura and Silvergate developments and has received confirmation that DR Horton would actively pursue the following redevelopment opportunities:

#### **Block 31, Lot 2.01 & Block 58 Lot 2.**

These developed parcels total 10.03 acres in area and are located at the north east intersection of Aura Road and Whig Lane. The parcels are currently included in the Aura III Redevelopment Plan area. An aerial map of these parcels has been provided under Appendix 3 entitled "Block 31 Lot 2.01 & Block 58 Lot 2 Affordable Housing Inclusionary Overlay".

A draft "ORDINANCE AMENDING THE AMENDED AURA III REDEVELOPMENT PLAN TO INCLUDE BLOCK 34, LOTS 9, 8, 7, & 6 BLOCK 31, LOT 2.01 & BLOCK 58, LOT 2 WITH STANDARDS FOR AFFORDABLE HOUSING INCLUSIONARY TOWNHOUSE

DEVELOPMENT TO ADDRESS THE REQUIREMENTS OF THE FAIR HOUSING ACT REGARDING COMPLIANCE WITH THE TOWNSHIP'S AFFORDABLE HOUSING OBLIGATIONS has been provided as Appendix 5 and is intended to be adopted by the Township.

The above referenced Ordinance will create affordable housing overlay zoning in the Aura III Redevelopment Plan to permit family townhouses at a density of 8 units per acre with an inclusionary affordable housing set aside of 20%. This results in a potential development of 80 family units (10.03 acres x 8 units per acre = 80 units) with 16 affordable family units (80 units x 20% = 16 units). In addition, 8 bonus credits will be available as this is a redevelopment of previously developed properties for a total of 24 credits.

As the subject parcels are located in the Aura redevelopment area, they can be serviced by public water and sewer by NJAW under the Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement, dated June 28, 2018 and the associated NJDEP Treatment Works Approval – Aura and Silvergate, Elk Township, Gloucester County, NJ.

#### Block 34, Lots 6, 7, 8, & 9

These developed parcels total 4.61 acres in area and are located at the south west intersection of Aura Road and Whig Lane. The parcels are currently included in the Aura III Redevelopment Plan area. An aerial map of these parcels has been provided under Appendix 4 entitled "Block 34, Lots 6, 7, 8 & 9 Affordable Housing Inclusionary Overlay".

A draft "ORDINANCE AMENDING THE AMENDED AURA III REDEVELOPMENT PLAN TO INCLUDE BLOCK 34, LOTS 9, 8, 7, & 6 BLOCK 31, LOT 2.01 & BLOCK 58, LOT 2 WITH STANDARDS FOR AFFORDABLE HOUSING INCLUSIONARY TOWNHOUSE DEVELOPMENT TO ADDRESS THE REQUIREMENTS OF THE FAIR HOUSING ACT REGARDING COMPLIANCE WITH THE TOWNSHIP'S AFFORDABLE HOUSING OBLIGATIONS has been provided as Appendix 5.

The above referenced Ordinance will create affordable housing overlay zoning in the Aura III Redevelopment Plan to permit family townhouses at a density of 8 units per acre with an inclusionary affordable housing set aside of 20%. This results in a potential development of 36 family units (4.61 acres x 8 units per acre = 36 units) with 8 affordable family units (36 units x 20% = 8 units). In addition, 4 bonus credits will be available as this is a redevelopment of previously developed properties for a total of 12 credits.

As the subject parcels are located in the Aura redevelopment area, they can be serviced by public water and sewer by NJAW under the Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement, dated June 28, 2018 and the associated NJDEP Treatment Works Approval – Aura and Silvergate, Elk Township, Gloucester County, NJ.

The above provides for 40 credits which addresses the 25% Adjusted Prospective Need Requirement of 40 units as demonstrated in the following table.

Name of Project	Type	Units
Aura 2	Family for-sale or rental	16
Block 31, Lot 2.01 & Block 58 Lot 2. Redevelopment.	Family Rental	16
Block 34, Lots 6, 7, 8, & 9. Redevelopment	Family Rental	8
TOTAL		40

The Township is addressing its remaining Fourth Round obligation (unmet need of 157 units) through a durational adjustment. As demonstrated by the above facts, the Township does not have sufficient 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 for the remaining obligation.

In accordance with N.J.A.C. 5:93-4.3(c), the requirement to address the remaining Fourth Round obligation (unmet need of 157 units) shall be deferred until adequate water and/or sewer are made available. The Township shall reserve and set aside new water and/or sewer capacity, when it becomes available, for low and moderate income housing, on a priority basis. Municipal officials shall endorse all applications to the Department of Environmental Protection (DEP) or its agent to provide water and/or sewer capacity. Where the DEP or its designated agent approves a proposal to provide infrastructure to a site for the development of low and moderate income housing identified in the housing element, the Township shall permit such development. Where the Township has designated sites for low and moderate income housing that lack adequate water and/or sewer and where the DEP or its designated agent approves a proposal to provide water and/or sewer to a site other than those designated for the development of low and moderate income housing in the housing element, the Township shall amend its housing element and fair share housing ordinance to permit development of such site for low and moderate income housing.

To further address the adjusted prospective unmet need, the Township intends to amend the Township's Ordinance Chapter 40 AFFORDABLE HOUSING, by providing the following:

Any property in the Township of Elk that is currently zoned for residential use or subsequently receives a zoning change, use variance approval, or a redevelopment plan to permit residential development shall provide an affordable housing set-aside of 20%. This affordable housing set-aside shall apply to all residential developments of 5 units or more. No property shall be subdivided so to avoid compliance with this requirement. Any residential development of 4 units or less units shall provide an affordable housing development fee in accordance with Article II Mandatory Development Fees. Moreover, this provision governs municipal actions only and shall not entitle any property owner or developer to such action by the Township. All affordable units created pursuant to this subsection shall be governed by

the provisions of this chapter. This shall apply to all residential developments unless the affordable housing requirements of a residential development is otherwise prescribed by the most recent adopted Housing Element and Fair Share Plan.

### **1. Very Low Income Housing**

In 2008, P.L. 2008, c. 46 was signed by the Governor, which made a number of changes to the affordable housing rules. In fact, it amended the Fair Housing Act (hereinafter "FHA") to include a requirement that at least 13% of affordable housing units must be made available to very-low income households. Specifically, the FHA reads:

*The council shall coordinate and review the housing elements as filed pursuant to section 11 of P.L.1985, c.222 (C.52:27D-311), and the housing activities under section 20 of P.L.1985, c.222 (C.52:27D-320), at least once every three years, to ensure that at least 13 percent of the housing units made available for occupancy by low-income and moderate income households will be reserved for occupancy by very low income households, as that term is defined pursuant to section 4 of P.L.1985, c.222 (C.52:27D-304).*

"Very low income housing" means housing affordable according to federal Department of Housing and Urban Development or other recognized standards for home ownership and rental costs and occupied or reserved for occupancy by households with a gross household income equal to 30% or less of the median gross household income for households of the same size within the housing region in which the housing is located.

Elk Township's very-low income obligation remains at 13% of the affordable housing obligation not constructed.

### **2. Preservation of Multigenerational Family Continuity**

Pursuant to the 2024 Fair Housing Act, an analysis was conducted to evaluate the extent to which municipal ordinances and local factors promote or impede the preservation of multigenerational family continuity, as recommended by the Multigenerational Family Housing Continuity Commission (established under P.L.2021, c. 273). The Commission's primary objective is to facilitate senior citizens' ability to reside with their extended families, in so doing strengthening multigenerational family ties.

A review of the Township's ordinances reveals no provisions that would diminish this objective.

### **3. State Development and Redevelopment Plan Consistency**

This Housing Element and Fair Share Plan is consistent with the 2001 State Development and Redevelopment Plan (SDRP) and the draft proposed SDRP as the proposed projects and zoning mechanisms will provide a meaningful opportunity for the construction of affordable housing.

### **4. Conclusion**

Elk Township will continue to grow in a planned and careful manner. The Township has already planned for a large amount of affordable homes and will continue to plan for responsible development in the future. It has always been Elk Township's intent to be inclusionary in its

housing policies. The Township has prepared a plan that provides opportunities for the provision of affordable housing, but its implementation will require continued cooperation among the Township, developers, Gloucester County, and non-profit organizations.

## **APPENDIX 1**

### **Municipal Resolution Adopting Fourth Round Affordable Housing Obligations**

**RESOLUTION R-81-2025****RESOLUTION OF THE MAYOR AND COMMITTEE OF THE TOWNSHIP OF ELK  
DIRECTING THE COMBINED PLANNING AND ZONING BOARD OF ADJUSTMENT TO PREPARE  
A HOUSING ELEMENT AND FAIR SHARE PLAN AND SPENDING PLAN TO ADDRESS THE TOWNSHIP OF  
ELK'S 4<sup>TH</sup> ROUND AFFORDABLE HOUSING OBLIGATIONS**

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**WHEREAS**, on March 20, 2024, the New Jersey Legislature adopted legislation known as P.L.2024, c.2, which set forth a procedure for calculating the 4<sup>th</sup> Round affordable housing obligation for municipalities, and which required this calculation to be adopted by the governing body of a municipality by way of Resolution; and

**WHEREAS**, N.J.S.A. 52:27D-304.2(b)(1) provides that the Fourth Round municipal affordable housing obligations shall run from the period of July 1, 2025 through June 30, 2035, and Region 5 consists of Burlington County, Camden County and Gloucester County ("Region 5"); and

**WHEREAS**, in accordance with N.J.S.A. 52:27D-304.1(f)(1)(b), on January 21, 2025, the Township of Elk adopted Resolution No. 33-2025, which set the Township's 4<sup>th</sup> Round affordable housing obligation as: (1) Present Need – 17 units; and (2) Prospective Need – 214 units; and

**WHEREAS**, on January 23, 2025, the Township filed the Resolution No. 33-2025 with the newly created Affordable Housing Dispute Resolution Program (the "Program") pursuant to N.J.S.A. 52:27D-313.2, in a Declaratory Judgment action under the caption, In the Matter of the Township of Elk's Determination of 4<sup>th</sup> Round Affordable Housing Obligations, Docket No.: GLO-L-000104-25 ("DJ Action"); and

**WHEREAS**, N.J.S.A. 52:27D-304.1(f)(2)(a), requires a municipality participating in the Program must adopt and submit to the Program a Housing Element and Fair Share Plan on or before June 30, 2025; and

**WHEREAS**, the 4<sup>th</sup> Round Housing Element and Fair Share Plan must contain:

1. Descriptions of all of the compliance mechanisms to ensure full compliance with the Township's 4<sup>th</sup> Round obligations and its prior round obligations;
2. Assessment of the degree to which the municipality has met its fair share obligation from the prior rounds of affordable housing obligations and determine to what extent this obligation is unfulfilled or whether the municipality has credits in excess of its prior round obligations;
3. If any prior round obligation remains unfulfilled, a description of how the unfulfilled obligation will be addressed, except that the Housing Element and Fair Share Plan shall retain any sites from prior round obligations that are subject to a contractual agreement with a developer, or for which the developer has filed a complete application seeking subdivision or site plan approval prior to adoption of the Housing Element and Fair Share Plan;
4. A detailed site suitability analyses, based on the best available data, for each of the un-built inclusionary or 100 percent affordable housing sites in the plan (including unbuilt sites from prior rounds);
5. Identification of each of the sites that were proposed for such development in the 4<sup>th</sup> Round and rejected, along with the reasons for such rejection;
6. A concept plan for the development of each of the selected sites should be overlaid on the most up to date environmental constraints map for that site as part of its analysis;
7. Documentation as to the start dates and lengths of affordability controls, income and bedroom distributions, and all affordable housing agreements or deed restrictions for all existing affordable units;

8. Drafts of proposed zoning or other ordinances and resolutions to implement the compliance mechanisms;
9. Spending Plan for the 4<sup>th</sup> Round; and
10. All other required components of a housing element as set forth in N.J.S.A. 52:27D-310; and

**WHEREAS**, the Housing Element and Fair Share Plan is an element of the Township Master Plan, which the Combined Planning and Zoning Board of Adjustment has the authority to prepare, adopt or amend pursuant to N.J.S.A. 40:55-28; and

**WHEREAS**, the Mayor and Committee of the Township of Elk request that the Combined Planning and Zoning Board of Adjustment prepare and adopt an Amended Housing Element and Fair Share Plan before June 30, 2025 in order to implement and comply with the Township's 4<sup>th</sup> Round affordable housing obligations.

**NOW, THEREFORE, BE IT RESOLVED** by the Mayor and Committee of the Township of Elk, as follows:

1. The foregoing recitals are incorporated herein by reference as if fully set forth at length.
2. The Clerk shall provide a copy of this Resolution to the Secretary of the Combined Planning and Zoning Board.
3. Mayor and Committee hereby direct that the Combined Planning and Zoning Board of Adjustment to prepare and adopt an Amended Housing Element and Fair Share Plan before June 30, 2025 in order to implement and comply with the Township's 4<sup>th</sup> Round affordable housing obligations.
4. The Combined Planning and Zoning Board of Adjustment shall submit to the Township's Solicitor a copy of the adopted Housing Element and Fair Share Plan, and the Combined Planning and Zoning Board of Adjustment's Resolution approving same within twenty-four (24) hours of adoption.

**ADOPTED** at a Regular Meeting of the Elk Township Committee held May 1, 2025.

TOWNSHIP OF ELK

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

CAROLYN D. K. SAMMONS, Mayor

ATTEST:

  
 DEBORA R. PINE, Township Clerk

ROLL CALL VOTE				
COMMITTEE	AYE	NAY	ABSTAIN	ABSENT
Cammarata	✓			
Cowan	✓			
Lucas	✓			
Rambo	✓			
Sammons	✓			

**CERTIFICATION**

I hereby certify that the above resolution is a true copy of a resolution adopted by the Township Committee of the Township of Elk, County of Gloucester, State of New Jersey, at a meeting held by the same on May 1, 2025, in the Elk Township Municipal Building, 680 Whig Lane, Monroeville, New Jersey.

\_\_\_\_\_  
 DEBORA R. PINE  
 Clerk

**FILED**

**April 24, 2025**

**Hon. Robert G. Malestein, P.J.Ch.**

**The Hon. ROBERT G. MALESTEIN, P.J.Ch.**

Superior Court of New Jersey  
Law Division – Civil Part  
GLOUCESTER COUNTY  
Gloucester County Courthouse  
1 N. Broad Street  
Woodbury, New Jersey 08096

**PREPARED BY THE COURT:**

**IN THE MATTER OF THE  
DECLARATORY JUDGMENT  
ACTION OF THE TOWNSHIP  
OF ELK, GLOUCESTER  
COUNTY PURSUANT TO P.L.  
2024, CHAPTER 2**

Petitioner.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – CIVIL PART  
GLOUCESTER COUNTY  
DOCKET NO. GLO-L-104-25

Civil Action

Mt. Laurel Program

**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 23, 2025 (“DJ Complaint”) by the Petitioner, TOWNSHIP of ELK (“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 17 affordable units, and its “**prospective need**” obligation of the Petitioner has been calculated and reported as 214 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:

**IT IS, THEREFORE**, on this 24th day of **APRIL 2025 ORDERED AND ADJUDGED** as follows:

1. That the “present need” obligation of the Municipality, be, and hereby is fixed as 17 affordable units for the Fourth Round housing cycle.

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<sup>1</sup> See [https://nj.gov/dca/dlps/pdf/FourthRoundCalculation\\_Methodology.pdf](https://nj.gov/dca/dlps/pdf/FourthRoundCalculation_Methodology.pdf)

2. That the “prospective need” obligation of the Municipality, be, and hereby is fixed as 214 affordable units for the Fourth Round Housing cycle; and

3. 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 any and all “challenges” to the Petitioner’s housing element and fair share plan as adopted pursuant to Paragraph 3 above must be filed by August 31, 2025, by way of Answer/Objection filed in the eCourts case jacket for this Docket No. #     -<sup>GLO-104-25</sup>~~1-25~~, and as provided for and in accordance with Section III.B of Directive #14-24; and

**IT IS FURTHER ORDERED**, that a copy of this Order shall be deemed served on the Petitioner, Petitioner’s counsel and the Program Chair upon its posting by the Court to the eCourts case jacket for this matter pursuant to R. 1:5-1(a) and R. 1:32-2A.

SO ORDERED:

*Robert G. Malestein, P.J.Ch.*

**HON. ROBERT G. MALESTEIN, P.J.Ch.**

*Designated Mt. Laurel Judge – Vicinage 15*

(X) Uncontested.

## **APPENDIX 2**

### **Spending Plan**

**Township of Elk, Gloucester County**  
**Affordable Housing Trust Fund Spending Plan**

**June 2025**

**Adopted \_\_\_\_\_ 2025**

**INTRODUCTION**

The Township of Elk, Gloucester County has prepared a Housing Element and Fair Share Plan in accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.), the Fair Housing Act (N.J.S.A. 52:27D-301).

This Spending Plan is intended to demonstrate commitment of the funds in the affordable housing trust fund within four years of the date of collection as required by P.L. 2008 c.46, to ensure that the Township will retain the funds and have the authority to utilize the funds in support of affordable housing within the Township. This Spending Plan provides a specific plan for the expenditure of the monies collected as of June 2025 and a guide for the expenditure of monies that may be deposited in the fund over the next ten years.

## 1. REVENUES FOR CERTIFICATION PERIOD

To calculate a projection of revenue anticipated through 2035, the Township of Elk considered the following:

(a) Development fees:

1. Development fees collected as of the time of preparation of this plan.
2. Development fees will be collected on all future development that may come before the Township's Joint Land Use Board in accordance with the Township's development fee Ordinance.

(b) Payment in lieu (PIL):

- No known committed PIL

(c) Other funding sources:

Funds from other sources, including, but not limited to, the sale of units with extinguished controls, repayment of affordable housing program loans, rental income, and proceeds from the sale of affordable units. None at this time.

Projected interest:

Interest on the projected revenue in the municipal affordable housing trust fund at the current average interest rate. The interest is estimated to be \$2,500 dollars per year. Interest collected will vary depending upon the actual revenues and expenditures.

SOURCE OF FUNDS	PROJECTED REVENUES – AFFORDABLE HOUSING TRUST FUND 2025 THROUGH 2035											Total		
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035			
(a) Development fees:														
Approved Development	\$20,000													\$20,000.00
Development Pending Approval		\$20,000												\$20,000.00
Projected Development			\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$180,000
(b) Payments in Lieu of Construction		-	-	-	-	-	-	-	-	-	-	-	-	-
(c) Other Funds (Specify source(s))		-	-	-	-	-	-	-	-	-	-	-	-	-
(d) Interest	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$25,000
Total (Township had a \$627,723.52 balance as of 5/29/2025)	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$852,732.52

The Township of Elk projects a total revenue of \$852,732.52 to be collected through 2035. All interest earned on the account shall be used only for the purposes of affordable housing.

## 2. ADMINISTRATIVE MECHANISM TO COLLECT AND DISTRIBUTE FUNDS

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

(a) Collection of development fee revenues:

Collection of development fee revenues shall be consistent with the Township of Elk's development fee ordinance for both residential and non-residential developments in accordance with P.L.2008, c.46, sections 8 (C. 52:27D-329.2) and 32-38 (C. 40:55D-8.1 through 8.7).

(b) Distribution of development fee revenues:

1. The Municipal Housing Liaison forwards a recommendation for expenditure of funds to the Township Clerk.
2. The Township Clerk forwards the recommendation to the Mayor and Committee with an explanation of how the expenditure will advance implementation of the Township's affordable housing objectives and whether the expenditure will be consistent with the Spending Plan.
3. Mayor and Committee reviews the request and authorizes the expenditure by resolution.
4. The Municipal Housing Liaison and the CFO maintain accounting of expenditures.

**3. DESCRIPTION OF ANTICIPATED USE OF AFFORDABLE HOUSING FUNDS**

At this time the planned uses for the Affordable Housing Funds include administrative costs, rehabilitation, and affordability assistance. The spending plan will be amended if further needs are required including but not limited to the maintenance and/or repair of existing affordable housing units. Excess funds will go towards future Round V, if needed.

(a) Administrative Expenses (N.J.A.C. 5:97-8.9)

Actual development fees and interest thru 5/29/2025		\$ 662,925.02
Projected Development Fees and interest 2025-2035		\$ 225,000
Payments in lieu and other deposits through 5/29/2025		\$ N/A
Subtotal	=	\$ 887,925.02
Calculate 20 percent of Subtotal for Allowed Admin. Exp.	x .20 =	\$ 177,585.00
Less Administrative expenses through 5/29/2025	-	\$ 35,201.50
Administrative expenses through 7/30/2035	=	\$ 142,383.50

The Township of Elk projects that \$142,383.50 will be available for administrative expenses through 2035. However, since there is no certainty about the timing of revenue deposits, the Township will continue to calculate the maximum amount to be expended on administrative expenses yearly. Projected administrative expenditures, in accordance with 5:99-2.4, subject to the 20 percent cap, are as follows:

Administrative expenses may include costs reasonably related to the determination of the fair share obligation and the development of a municipal housing element and fair share plan and may include fees necessary to develop or implement affordable housing programs, an affirmative marketing program, and/or expenses that are reasonably necessary for compliance with the processes of the Program, including, but not limited to, the costs to the municipality of resolving a challenge pursuant to the Program.

Administrative expenses may also include costs associated with functions carried out in compliance with UHAC, including activities related to the marketing program and waitlist management, administering the placement of occupants in housing units, income qualification of households, monitoring the turnover of sale and rental units, preserving existing affordable housing, and compliance with the Division's monitoring requirements.

The proportion of a municipal employee's salary related to the MHL or RCA administrator functions and fees for required educational paid as an administrative expense from the municipal affordable housing trust fund.

As additional monies are deposited into the affordable housing trust fund from anticipated residential development (mandatory development fees and payments-in-lieu); a maximum of 20% of the total will be available for administrative expenses related to the preparation, administration, and implementation of the Township's affordable housing program.

(b) Rehabilitation programs and projects (N.J.A.C. 5:97-8.7)

Elk Township will dedicate \$ 170,000 to rehabilitation as follows:

N.J.A.C. 5:93-5.2(g) and (h) requires \$10,000 to be spent per unit and a six-year control on affordability for owner-occupied units. Rental units are required to have ten-year controls on affordability. Additionally a major systems must be repaired in order for a home to qualify as a credit. The present need rehabilitation according to FSHC report is 17. The Township plans to address the rehabilitation obligation through participation in Gloucester County's rehabilitation program, which is administered with the use of CDBG and HOME funds. The Township may subsidize approximately 50% of the county funds with money from its own trust fund.

1 The rules specifically require a minimum of \$2,000 per unit to be spent on administration and \$8,000 per unit to be spent on the rehabilitation activity, which totals at least \$10,000.

2 A major system is defined by N.J.A.C. 5:93-5.2(b) as weatherization, a roof, plumbing (including wells), heating, electricity, sanitary plumbing (including septic systems) and/or a load bearing structural system.

Rehabilitation program: \$ 170,000

(c) Affordability Assistance (N.J.A.C. 5:97-8.8)

AFFORDABILITY ASSISTANCE CALCULATION

Actual development fees through 5/21/2025		\$644,664.75
Actual interest earned through 5/21/2025	+	\$18,260.27
Development fees projected 2025-2035	+	\$220,000.00
Interest projected 2025-2035	+	\$25,000.00
Less housing activity expenditures through 5/29/2025	-	\$35,201.50
Subtotal	=	\$872,723.52
Calculate 30 percent	x .30 =	\$261,817.06
Less Affordability assistance expenditures through 12/29/2035	-	\$0
PROJECTED MINIMUM Affordability Assistance Requirement 7/1/2025 through 7/30/2035	=	\$261,817.06
PROJECTED MINIMUM Very Low-Income Affordability Assistance Requirement 7/1/2025 through 7/30/2035	÷ 3 =	\$87,272.35

Elk Township will dedicate \$261,817.06 from the affordable housing trust fund to render units more affordable, including \$87,272.35 to render units more affordable to households earning 30 percent or less of median income by region, as follows: *down-payment assistance, rental and/or down payment assistance, assistance with emergency repairs, and converting low-income units to very-low-income units.*

**4. EXPENDITURE SCHEDULE**

The Township of Elk intends to use affordable housing trust fund revenues for the creation and rehabilitation of housing units as set forth above. The Township will commit funds to specific programs as outlined above, or the plan will be amended.

PROJECTS/ PROGRAMS	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	TOTAL
Administration	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,238.35	\$14,213.94	\$142,383.50
Rehabilitation	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000	\$170,000
Affordability Assistance	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$26,181.71	\$261,817.06
Total	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$57,420.06	\$574,200.56

**5. EXCESS OR SHORTFALL OF FUNDS**

The Township plans to implement the Spending Plan incrementally with the funds that are collected; and will ensure that the collected funds are spent consistent with the applicable rules and regulations and in a manner that advances the Township's affordable housing goals. The purpose of the Spending Plan is to plan for expenditure of monies in the affordable housing trust fund. N.J.A.C. 5:97-8.10(a)(9) requires that the spending plan address the "manner through which the municipality will address any expected or unexpected shortfall if the anticipated revenues are not sufficient to implement the plan".

In the event more funds than anticipated are collected, projected funds exceed the amount necessary to implement the Fair Share Plan, or the Township of Elk is reserving funds for affordable housing projects to meet a future affordable housing obligation, these excess funds will be used to expand the programs described above and to implement the supportive and special needs housing, assist in necessary infrastructure as it relates to affordable housing units, assist in the maintenance and repair of existing affordable units.

**SUMMARY**

The Township of Elk intends to spend affordable housing trust fund revenues pursuant to N.J.A.C. 5:97-8.7 through 8.9 and consistent with the housing programs outlined in the Housing Element and Fair Share Plan dated June 2025.

<b>SPENDING PLAN SUMMARY</b>	
Balance as of May 29, 2025	\$ 627,723.52
<b>PROJECTED REVENUE 2025-2035</b>	
Development fees	+ \$ 220,000.00
Payments in lieu of construction	+ \$ 0
Other funds	+ \$ 0
Interest	+ \$ 25,000.00
Total projected revenue	= \$ 245,000.00
<b>TOTAL REVENUE</b>	<b>= \$ 871,502.81</b>
<b>PROJECTED EXPENDITURES 2025-2035</b>	
Administration	- \$ 142,383.50
Rehabilitation of existing homes or money towards new homes and group homes	- \$ 170,000.00
Affordability Assistance	- \$ 261,817.06
Excess Funds or Remaining Balance Reserved for Additional Affordable Housing Activity	= \$ 467,302.25
<b>TOTAL PROJECTED EXPENDITURES</b>	<b>= \$ 574,200.56</b>
<b>REMAINING BALANCE</b>	<b>= \$ 297,302.25</b>

## **APPENDIX 3**

### **Block 31 Lot 2.01 & Block 58 Lot 2 Affordable Housing Inclusionary Overlay**



**BLOCK 31 LOT 2.01 & BLOCK 58 LOT 2  
AFFORDABLE HOUSING  
INCLUSIONARY OVERLAY**

**Map Data & Source:**

Data Source: NJGFS, NJDEP	Proj: ET2025-1
Scale: 1" = 200'	Date: December 2025
Drafted by: Chloe Bach, PP, AICP	
Prepared by: Steven M. Bach, PE, RA, PP, CME	

**Township of Elk  
Gloucester County, NJ**

\*This map was developed using NJGFS/NJDEP Geographic Information System data. The information shown on this map has not been verified by NJGFS/NJDEP and is not state authorized.



304 White Horse Pike  
Haddon Heights, New Jersey 08035  
Tel: 856-546-8611  
Fax: 856-546-8612  
www.BachDesignGroup.com

## **APPENDIX 4**

### **Block 34, Lots 6, 7, 8 & 9 Affordable Housing Inclusionary Overlay**



**BLOCK 34 LOTS 6, 7, 8 & 9  
AFFORDABLE HOUSING  
INCLUSIONARY OVERLAY**

Map Data & Source:

Data Source: NJGFS, NJDEP	
Scale: 1" = 100'	Proj: ET/2025-1
Date: December 2025	
Drafted by: Chloe Bach, PP, AICP	
Prepared by: Steven M. Bach, PE, RA, PP, CME	

**Township of Elk  
Gloucester County, NJ**

\*This map was developed using NJGFS/NJDEP Geographic Information System (GIS) data. The information shown on this map has not been verified by NJGFS/NJDEP and is not state authorized.



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## **APPENDIX 5**

**Draft “ORDINANCE AMENDING THE AMENDED AURA III REDEVELOPMENT PLAN TO INCLUDE BLOCK 34, LOTS 9, 8, 7, & 6 BLOCK 31, LOT 2.01 & BLOCK 58, LOT 2 WITH STANDARDS FOR AFFORDABLE HOUSING INCLUSIONARY TOWNHOUSE DEVELOPMENT TO ADDRESS THE REQUIREMENTS OF THE FAIR HOUSING ACT REGARDING COMPLIANCE WITH THE TOWNSHIP’S AFFORDABLE HOUSING OBLIGATIONS”**

Elk Township, Gloucester County  
2026

ORDINANCE \_\_\_\_\_

AN ORDINANCE AMENDING THE AMENDED AURA III REDEVELOPMENT PLAN TO INCLUDE BLOCK 34, LOTS 9, 8, 7, & 6 BLOCK 31, LOT 2.01 & BLOCK 58, LOT 2 WITH STANDARDS FOR AFFORDABLE HOUSING INCLUSIONARY TOWNHOUSE DEVELOPMENT TO ADDRESS THE REQUIREMENTS OF THE FAIR HOUSING ACT REGARDING COMPLIANCE WITH THE TOWNSHIP'S AFFORDABLE HOUSING OBLIGATIONS

BE IT ORDAINED by the Mayor and Committee of the Township of Elk, Gloucester County, New Jersey, that the Amended Aura III Redevelopment Plan of the Township of Elk is hereby amended to include provisions addressing Elk's constitutional obligation to provide for its fair share of low- and moderate-income housing, as directed by the Superior Court and consistent with N.J.A.C. 5:93-1, et seq., as amended and supplemented, N.J.A.C. 5:80-26.1, et seq., as amended and supplemented, and the New Jersey Fair Housing Act of 1985. This Ordinance is intended to provide assurances that low- and moderate-income units ("affordable units") are created with controls on affordability over time and that low- and moderate-income households shall occupy those units. This Ordinance shall apply except where inconsistent with applicable law.

WHEREAS, BLOCK 34, LOTS 9, 8, 7, & 6 BLOCK 31, LOT 2.01 & BLOCK 58, LOT 2 within the Township of Elk were designated by Township Committee as a Non-Condensation Area in Need of Redevelopment in accordance with Resolution 2016-13 on May 18, 2016; and

WHEREAS, the Aura III Redevelopment Plan within the Township of Elk Recommended to Township by the Joint Land Use Board after a public hearing on May 20, 2020 with Resolution 2020-08 and adopted by Township Committee in accordance with Ordinance O-2-2020 on June 4, 2020; and

WHEREAS, the Amended Aura III Redevelopment Plan within the Township of Elk was recommended to Township Committee by the Joint Land Use Board after a public hearing on March 20, 2024 with Resolution 2024-08 and Adopted by Township Committee in accordance with Ordinance O-1-2024 on April 4, 2024; and

WHEREAS, on June 18, 2025, the Township Planning Board adopted the Housing Element and Fair Share Plan pursuant to Resolution No. 2025-08; and

WHEREAS, on March 2, 2026, the Township Planning Board adopted the Amended Housing Element and Fair Share Plan pursuant to Resolution No. 2026-\_\_; and

WHEREAS, pursuant to the February 2026 Housing Element and Fair Share Plan amended per mediation with the Fair Share Housing Center in January 2026, the Township has identified two locations which are projected to be suitable for redevelopment; and

WHEREAS, four (4) parcels (Block 34, Lots 9, 8, 7, & 6) containing 4.6 acres of property which is projected to be suitable for redevelopment; and

WHEREAS, Block 34, Lots 9, 8, 7, & 6 are located adjacent to and in close proximity to proposed higher density residential development, as well as recreation and school facilities; and

WHEREAS, two (2) parcels (Block 31, Lot 2.01 & Block 58, Lot 2) containing 10 acres of property which is projected to be suitable for redevelopment; and

Elk Township, Gloucester County  
2026

WHEREAS, Block 31, Lot 2.01 & Block 58, Lot 2 are located adjacent to and in close proximity to proposed higher density residential development, as well as recreation and school facilities; and

WHEREAS, the Township has agreed to amend the Amended Aura III Redevelopment Plan to include Block 31, Lot 2.01 & Block 58, Lot 2 and Block 34, Lots 9, 8, 7, & 6 to provide a realistic development potential for these parcels to provide inclusionary housing opportunities; and

WHEREAS, this Affordable Housing Inclusionary Family Townhouse Overlay Zone shall permit 8 du/acre inclusionary family townhouses with a required 20% set-aside on both parcels (Block 31, Lot 2.01 & Block 58, Lot 2 and Block 34, Lots 9, 8, 7, & 6); and

**WHEREAS**, the Mayor and Township Committee of the Township of Elk has determined that in light of the foregoing it is in the best interest of the Township to adopt and implement this Ordinance that is in keeping with goals of the Master Plan and is in best interest of the Township and health, safety and welfare of its residents and visitors;

**NOW THEREFORE, BE IT ORDAINED** by the Mayor and Township Committee of the Township of Elk , County of Gloucester and State of New Jersey that:

Section 1. Amend the Amended Aura III Redevelopment Plan to create the Affordable Housing Inclusionary Family Townhouse Overlay Zone within which shall include all properties located within Block 31, Lot 2.01 & Block 58, Lot 2 and Block 34, Lots 9, 8, 7, & 6 of the Township.

Section 2. Affordable Housing Inclusionary Family Townhouse Overlay Zone for Block 31, Lot 2.01 & Block 58, Lot 2 and Block 34, Lots 9, 8, 7, & 6

**A. Permitted Uses**

(1) Permitted Residential Uses

- (a) Townhomes at 8 du/acre with a mandatory affordable housing set-aside of 20%

(2) Permitted Non-Residential

- (a) New Home Sales Center. Bulk standards shall be consistent with residential building type standards as in Section A- Bulk Standards.
- (b) Common recreational and cultural uses for the use of the residents of the community and their guests (i.e. clubhouse or community building, swimming pools, Sport uses such as shuffleboard courts, bocce courts, tennis courts, pickle ball courts, basketball courts, putting greens and horseshoe pits, no minimum lot area required.

(3) Permitted Accessory Uses: Residential Uses

- (a) Civic uses and temporary uses to benefit the community (i.e. farmers market, outdoor movies)

- (b) Off Street parking and loading for clubhouse and recreation areas require one (1) space per 400 square feet of non-residential area.
- (c) Parking for all residential units shall be in accordance with N.J.S.A. 5:21 (Residential Site Improvement Standards).
- (d) Cluster Mailboxes.
- (e) Retaining walls.
- (f) Fences.
- (g) Decks and patios.
- (h) Signs in accordance with Section 96-60 of the Township Code.
- (i) Storm water management structures and facilities.
- (j) Trash enclosures as approved in conjunction with subdivision or site plan approval.
- (k) Gazebos, shelters, benches and other outdoor furniture as approved in conjunction with subdivision or site plan approval.
- (l) Necessary facilities for maintenance and administration of the development including streets, off-street parking facilities and utilities.
- (m) Parking structures as approved in conjunction with site plan approval
- (n) Hot boxes, transformers and other required utilities and their accessories as required by outside agencies.

**B. Design Standards**

A. Water and Sewer Infrastructure.

B. Open Space. Land is to be set aside as open space.

C. Bulk Requirements. Development in the Affordable Housing Inclusionary Family Townhouse Overlay Zone shall conform to the bulk standards provided in Schedule A below. Where a standard in Schedule A differs from a standard in the Elk Township Land Development Code, the standard in Schedule A shall supersede.

**Schedule A-Bulk Standards**

Land Use Category	Building Type	Min. Lot Size	Lot Width @ Building Setback	Lot Depth	Setbacks	Acc. Setback	Height	Impervious cover
					Front/Side/Rear	rear/side/pool	Floors/ Feet	max.
	Townhome	1,700 sf	20' min	85'	18' min-20' min with garage / 20' end unit / 15' min	Not Permitted	3 / 45' max	85%

Section 3. It is hereby found and determined that the Ordinance conforms to the Master Plan of the Township of Elk.

Section 4. It is hereby found and determined that the Ordinance gives due consideration to the provision of appropriate allowable uses within the areas within the Township with special consideration for the health, safety and welfare of the residents of the areas and the Township of Elk.

Section 5. In order to facilitate the implementation Ordinance, it is hereby found and determined that this action must be taken by Mayor and Township Committee to amend the Amended Aura III Redevelopment Plan and take appropriate action upon proposals and measures designed to effectuate the same.

Section 6. All Ordinances contrary to the provisions of this section of the Ordinance are hereby repealed to the extent that they are inconsistent herewith.

Section 7. This Ordinance shall take effect upon final passage and publication in accordance with law.

Section 8. Effective Date. This Ordinance shall take effect upon adoption and publication according to law and the filing of same with the Gloucester County Planning Board in accordance with N.J.S.A. 40:55D-16

ROLL CALL VOTE						
<u>COMMITTEE MEMBER</u>	INTRODUCED	SECONDED	AYE	NAYE	ABSTAIN	ABSENT

Adopted on second and final reading on

Elk Township, Gloucester County  
2026

---

Township of Elk

---

By: James Rambo, Mayor

ATTEST:

---

By: Timothy Pine, Township Clerk

Elk Township, Gloucester County  
2026

**NOTICE**

NOTICE IS HEREBY GIVEN, that the above Ordinance was introduced and passed on first reading at the Regular Business Meeting of the Governing Body of the Township of Elk held in the Municipal Building on the \_ day of \_\_\_\_, 2025, and the same shall come up for public hearing at the Regular Business Meeting of the Governing Body to be held on the \_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_ P.M., at which times any persons interested shall be given the opportunity to be heard concerning said Ordinance. Following the public hearing, said Ordinance shall be considered for final adoption.

---

Timothy Pine

Municipal Clerk

## **APPENDIX**

### **Vacant Land Analysis**

**ELK TOWNSHIP**  
**Gloucester County, New Jersey**



**Vacant Land Analysis**

**Amended February 2026**

Steven M. Bach, PE, RA, PP, CME

Candace A. Kanaplue, AICP, PP

The original of this document was signed and sealed in accordance with NJAC 13:41-1.3.b

## **Elk Township 2026 Combined Planning and Zoning Board**

Matt Afflerbach (Chairperson)  
Jay Hughes (Vice Chairperson)

David Smith

Nathaniel G Lucas III (Committeeman)  
Al Richardson (Class II Environmental)

Donna Nicholson

Ed McKeever

Marques Goetsch

Ed Wolf

Josh Peterson (Alternate 1)

Wayne Swanson (Alternate 2)

Ann Marie Weitzel, Secretary

Brandon E. DeJesus, Esq, Solicitor

Steven M. Bach, PE, RA, PP, CME, Engineer

Candace A. Kanaplue, PP, AICP, Planner

## **2026 Elk Township Committee**

James Rambo, Mayor

Carolyn King-Sammons, Deputy Mayor

Christine Cowan

Nathaniel G Lucas III

Antonio Cammarata

Tim Pine, Township Clerk

Brian Duffield, Esq, Township Solicitor

Steven M. Bach, PE, RA, PP, CME, Engineer

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## I. INTRODUCTION

Elk Township is located in Gloucester County. The Township shares a boundary with Glassboro Borough to the northeast, Clayton Borough to the east, Franklin Township to the southeast, Upper Pittsgrove Township in Salem County to the south, South Harrison Township to the west, and Harrison Township to the north. Elk Township is approximately 19.69 square miles or approximately 12,366 acres.

About 23% (2,878 acres) of the Township are environmentally constrained. Elk Township contains six (6) State Development and Redevelopment Plan Planning Areas. Its largest planning area is Environmentally Sensitive with 32.25% of the Township's area, followed by Rural Environmentally Sensitive (23.92%), Suburban (18.28%), Fringe (16.06%), Rural (9.45%), and Metro (0.04%).

This Vacant Land Inventory is prepared to document the lack of available land capacity, pursuant to NJAC 5:93.

The following are included as appendices:

1. Existing Land Use Map
2. Environmental Constraints Map
3. State Planning Area Map
4. Preserved Farmland Map
5. Aura I & II Development Area Map
6. Aura III Redevelopment Area Map
7. Villages of Still Run Redevelopment Area Zoning Exhibit
8. Sewer Service Area Map (Churchill Consulting Engineers, PC), last revised 5/23/12
9. Vacant Land Map
10. Vacant Parcels Inventory Table
11. Developable Lands Map 1 of 2
12. Developable Lands Map 1 of 2
13. Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement, dated June 28, 2018
14. Vacant Parcels Sanitary Sewer Feasibility Table

15. NJDEP Treatment Works Approval – Aura and Silvergate, Elk Township, Gloucester County, NJ – DESIGN REPORT Wastewater Pumping and Force Mains Analyses, prepared by Taylor Wiseman, revised to January 25, 2023

## **II. VACANT LAND ANALYSIS**

### **A. IDENTIFICATION OF VACANT LAND**

This Inventory reviewed the 2024 MOD IV Tax Data records for Vacant (Property Class 1), Agricultural (Property Classes 3A and 3B), and Public (Property Class 15C) lands in the Township. These parcels were joined into Geographic Information System (GIS) in order to review development capacity and the potential for use as affordable housing sites.

### **B. PROPERTIES EXCLUDED FROM THE VACANT LAND INVENTORY**

The Vacant Land Inventory is prepared to document the lack of available land capacity within the Elk Township. As provided by NJAC 5:93, lands meeting specific criteria may be excluded from the calculation of a municipality's Realistic Development Potential.

These exclusions are:

- Small isolated properties having insufficient acreage to generate an affordable housing set aside as part of an inclusionary development. Per NJAC 5:93-4.1(f), an affordable housing site must be able to accommodate a minimum density of 6 unit per acre with a maximum affordable housing set aside of 20%. Therefore, isolated properties of less than 0.83 acres are excluded as well as properties outside the regional (Gloucester County Utilities Authority) and municipal (Elk Township) sewer service areas as evidenced by the Elk Township Wastewater Management Plan prepared by Churchill Associates, PC. Please note the Sewer Service Area Map (Churchill Consulting Engineers, PC), last revised 5/23/12 is provided as Appendix 4.
- Land locked parcels or sites with limited or no access.
- Agricultural lands when the development rights to these lands have been purchased or restricted by covenant.
- Environmentally sensitive lands which include wetlands, flood hazard areas, areas of properties characterized by steep slopes in excess of 15%; and areas outside of the Sanitary Sewer Service Areas (SSA).
- Historic and architecturally important sites.
- Active recreational lands and properties identified on the municipality's Recreation and Open Space Inventory (ROSI and or / as part of the NJDEP Green Acres Program.

### **C. VACANT PROPERTIES**

Attached as Appendix 6 is the Vacant Land Inventory Table which contains data for block, lot, property classification, zoning, total acreage, planning area, sewer service area, buildable acreage, and reason for elimination.

As indicated in the Vacant Land Inventory Table contained as Appendix 10, 86 vacant properties are potentially viable for development.

It is noted that approximately 3,328 acres of the Township has been preserved as farmland. These represents about 27% of the Township's total land area. A Preserved Farmland Map has been provided as Appendix 4.

Also, it is important to note that there are significant areas of the Township that have already been designated for inclusionary affordable development under Round 3. These are depicted in the Aura I & II Development Area Map provided as Appendix 5, the Aura III Redevelopment Area Map provided as Appendix 6, and the Villages of Still Run Redevelopment Area Zoning Exhibit provided as Appendix 7.

### **D. LACK OF WATER AND SEWER**

When a community has sufficient land, but insufficient water and/or sewer to support inclusionary developed, the vacant parcels available for inclusionary development shall be reviewed to determine if it is realistic for the site to receive the required water and sewer during the period of certification (2025 to 2035). Inclusionary development is considered an affordable housing site that must be able to accommodate a minimum density of 6 unit per acre.

The parcels listed in Appendix 10 Vacant Land Inventory Table as being vacant and suitable for development were evaluated to determine if sufficient water and / or sewer service is available now or will be realistically available during the period of certification (2025-2035).

In Elk Township, only a portion of the Aura 1 development is currently served by public water and sewer. The remaining portions of the Township are serviced by individual wells and septic systems.

For the Aura (Phases 1, 2 and 3), the Silvergate (Phases 1 thru 6) inclusionary housing developments and the Silvergate (Phase VII Commercial Development; there exists a "Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement", dated June 28, 2018 (attached as Exhibit 7). This agreement allows for New Jersey American Water (NJAW) to provide for the water and sewer services to all of the Silvergate development area (which is also known as the Villages at Still Run Redevelopment Area) and all unbuilt areas of the Aura development which includes the remaining portion of Aura 1, Aura II and Aura III (which is also known as the Amended Aura III Redevelopment Plan Area). It is noted that the water and sewer improvements under this agreement are currently under construction. This construction is being undertaken by NJAW and DR Horton who is the contract developer for both the Aura 3 and Silvergate developments.

The sanitary sewer conveyance currently being constructed by NJAW under this agreement was the subject of a New Jersey Department of Environmental Protection (NJDEP) Treatment

Work Approval which delineates the conveyance capacity being provided by NJAW and the conveyance and treatment capacity being provided by the Gloucester County Utilities Authority. The specifics of these are detailed in Appendix 15 NJDEP Treatment Works Approval – Aura and Silvergate, Elk Township, Gloucester County, NJ – DESIGN REPORT Wastewater Pumping and Force Mains Analyses, prepared by Taylor Wiseman, revised to January 25, 2023.

The potentially developable vacant parcels contained in the Vacant Land Inventory Table contained as Appendix 10 were evaluated to determine which parcels are within proximity to the NJAW sanitary sewer conveyance system and can be provided conveyance and treatment capacity under the above referenced NJDEP Treatment Works Approval. The results are contained in the Vacant Parcels Sanitary Sewer Feasibility Table which is provided as Appendix 14.

From the referenced Vacant Parcels Sanitary Sewer Feasibility Table, two (2) parcels are identified as being vacant and having the ability to be serviced by public water and sewer:

Block 54, Lot 31 with an area of 2.435 acres, and

Block 54, Lot 26.03 with an area of 1.400 acres.

These parcels are depicted on the Developable Lands Maps as provided in Appendix 11 and 12.

In consultation with John Vinci, Executive Directory of the Gloucester County Utilities Authority, there is no regional sewer conveyance or sewer treatment capacity allocated to Elk Township other than what is provided under the “Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement” that will realistically be available within the period of certification (2025-2035). Without regional water and sewer conveyance and treatment capacity, it is not feasible for the Township to provide public sewer service to any additional areas of the Township other than the areas delineated in the “Silvergate & Aura Water and Sanitary Sewer Infrastructure Agreement”.

It is noted that while the only Block 54, Lot 31 and Lot 26.03 are anticipated to be serviced by public water and sewer within the period of certification (2025-2035), all of the 86 parcels identified in Appendix 10 Vacant Land Inventory Table as being suitable for development have been included in determination of the Township’s Realistic Development Potential.

It is further noted that the Township is utilizing a Duration Adjustment for all areas of the Township that are not within the sewer service area as identified on the Elk Township Water Quality Management Plan map “Sewer Service Area Map (Churchill Consulting Engineers, PC) last revised 5/23/12 which is included as Appendix 8. It is noted that this mapping is part of the current Gloucester County Non-Consolidated Wastewater Management Plan (WQMP) which was prepared under the provisions of NJAC 7:15.

**E. REALISTIC DEVELOPMENT POTENTIAL**

The following table provides the realistic development potential properties that are vacant and have the ability to be serviced by public water and sewer with the period of certification (2025-2035).

**ELK TOWNSHIP REALISTIC DEVELOPMENT POTENTIAL (RDP) TABLE**

BLOCK	LOT	CLUSTER	LOCATION	PROPERTY CLASS	ZONE	PARCEL SIZE (ACRES)	DEVELOPABLE AREA (AC)	TOTAL CLUSTER DEVELOPABLE AREA (AC)	POTENTIAL UNITS AT 6 DU/ACRE	POTENTIAL AFFORDABLE UNITS AT 20% SET ASIDE
103	1	B	505 MARION ST	1	MD	2.220	1.871	2.251	13.5	2.7
103	2		TAFT AVE	1	MD	0.115	0.115			
103	3		WEST BOULEVARD	15C	MD	0.267	0.166			
103	4		210 WEST BLVD	1	MD	0.115	0.098			
108	1.01	C	BUCK RD	1	MD	0.597	0.597	1.194	7.2	1.4
108	1.02		BUCK RD	1	MD	0.597	0.597			
119	1	D	360 HARRISON AVE	1	MD	0.482	0.482	1.573	9.4	1.9
119	2		518 PINE ST	1	MD	0.287	0.287			
119	3		514 HARDING ST	1	MD	0.115	0.115			
119	4		510 HARDING ST	1	MD	0.689	0.689			
121	1	E	525 MARION ST	1	MD	2.101	1.932	2.392	14.4	2.9
121	2		521 PIERCE AVE	1	MD	0.460	0.460			
122	1	F	401 PIERCE AVE	1	MD	2.196	2.196	2.483	14.9	3.0
122	2		MCKINLEY AVE	1	MD	0.115	0.115			
122	3		WEST BOULEVARD	1	MD	0.172	0.172			
161	1	G	SECOND AVE	1	MD	0.486	0.486	2.278	13.7	2.7
161	2		545 SECOND AVE	1	MD	0.230	0.230			
161	3		FIRST AVE	1	MD	0.459	0.459			
161	4		SECOND AVE	15C	MD	0.115	0.115			
161	5		FIRST AVE	1	MD	0.115	0.115			
161	6		SECOND AVE	1	MD	0.115	0.115			
161	7		SECOND AVE	1	MD	0.115	0.115			
161	9		SECOND AVE	1	MD	0.644	0.644			
162	1	H	THIRD AVE	15C	MD	0.245	0.245	2.421	14.5	2.9
162	3		561 THIRD AVE	1	MD	0.517	0.517			
162	4		565 THIRD AVE	1	MD	0.115	0.115			
162	5		570 SECOND AVE	1	MD	0.746	0.746			
162	6		460 WEST BLVD	1	MD	0.599	0.599			
162	7		440 WEST BLVD	1	MD	0.199	0.199			
163	2	I	558 THIRD AVE	1	MD	0.230	0.230	1.640	9.8	2.0
163	3		562 THIRD AVE	1	MD	0.401	0.401			
163	4		FOURTH AVE	1	MD	0.116	0.116			

BLOCK	LOT	CLUSTER	LOCATION	PROPERTY CLASS	ZONE	PARCEL SIZE (ACRES)	DEVELOPABLE AREA (AC)	TOTAL CLUSTER DEVELOPABLE AREA (AC)	POTENTIAL UNITS AT 6 DU/ACRE	POTENTIAL AFFORDABLE UNITS AT 20% SET ASIDE
163	5		FOURTH AVE	1	MD	0.443	0.443			
163	6		566 THIRD AVE	1	MD	0.114	0.114			
163	9		WEST BLVD	1	MD	0.057	0.057			
163	10		WEST BLVD	1	MD	0.115	0.115			
163	11		WEST BLVD	1	MD	0.057	0.057			
163	12		WEST BLVD	15C	MD	0.108	0.108			
125	4	J	ROOSEVELT AVE	15C	MD	0.057	0.057	1.148	6.9	1.4
125	6.03		STANGER AVE	1	MD	0.057	0.057			
125	7		239 STANGER AVE	1	MD	1.033	1.033			
145	3.01	L	SECOND AVE	1	MD	1.025	1.025	3.889	23.3	4.7
145	4		SECOND AVE	1	MD	0.115	0.115			
146	1		THIRD AVE	1	MD	0.201	0.201			
146	2		DOUGLASS ST	15C	MD	0.330	0.330			
146	3		FOURTH AVE	15C	MD	0.208	0.208			
146	4		524 THIRD AVE	1	MD	1.560	1.560			
146	5		FOURTH AVE	15C	MD	0.172	0.172			
146	6		FOURTH AVE	15C	MD	0.076	0.076			
146	8		DUNBAR BLVD	15C	MD	0.057	0.057			
146	9		112 DUNBAR BLVD	1	MD	0.145	0.145			
139	1.01	M	THIRD ST	1	MD	0.472	0.472	2.152	12.9	2.6
139	1.02		510 THIRD AVE	1	MD	1.246	1.246			
139	1.03		FOURTH AVE	15C	MD	0.057	0.057			
139	2		THIRD AVE	1	MD	0.262	0.262			
139	4		FOURTH AVE	1	MD	0.115	0.115			
132	5	N	SECOND AVE	1	MD	0.482	0.482	1.842	11.1	2.2
133	3		FOURTH ST	1	MD	1.143	1.143			
133	4		REED ST	1	MD	0.216	0.216			
143	2	O	DOUGLASS ST	1	MD	0.203	0.203	1.150	6.9	1.4
143	3		EIGHTH AVE	1	MD	0.947	0.947			
159	1	P	DUNBAR BLVD	1	MD	0.770	0.770	1.115	6.7	1.3
159	3		NINTH AVE	1	MD	0.344	0.344			
157	1	Q	DUNBAR BLVD	1	MD	0.854	0.854	0.969	5.8	1.2
157	3		SEVENTH ST	15C	MD	0.115	0.115			
166	6	R	555 SIXTH AVE	1	MD	0.574	0.574	0.918	5.5	1.1
166	7		549 SEVENTH AVE	1	MD	0.344	0.344			
154	1	S	DUNBAR BLVD	15C	MD	0.472	0.472	1.064	6.4	1.3
154	2		DUNBAR BLVD	15C	MD	0.592	0.592			

BLOCK	LOT	CLUSTER	LOCATION	PROPERTY CLASS	ZONE	PARCEL SIZE (ACRES)	DEVELOPABLE AREA (AC)	TOTAL CLUSTER DEVELOPABLE AREA (AC)	POTENTIAL UNITS AT 6 DU/ACRE	POTENTIAL AFFORDABLE UNITS AT 20% SET ASIDE
123	1	T	537 MARION ST	1	MD	0.474	0.474	3.029	18.2	3.6
123	2		MARION ST	1	MD	0.448	0.448			
123	3		MCKINLEY AVE	1	MD	1.056	1.056			
123	4		MCKINLEY AVE	1	MD	0.119	0.119			
123	5		WEST BLVD	1	MD	0.223	0.223			
123	7		WEST BLVD	15C	MD	0.306	0.306			
126	4		371 WEST BLVD	1	MD	0.174	0.174			
126	5		385 WEST BLVD	1	MD	0.115	0.115			
126	6		WEST BLVD	1	MD	0.115	0.115			
54	26.03		AURA RD	1	RE	1.400	1.400	1.400	8.4	1.7
54	31		AURA RD	1	RE	2.435	2.435	2.435	14.6	2.9
72	6		135 BUCK RD	1	MD	14.098	1.630	1.630	9.8	2.0
111	1		365 HARRISON AVE	1	MD	2.393	1.386	1.386	8.3	1.7
120	1.01		515 HARDING ST	1	MD	1.515	1.350	1.350	8.1	1.6
137	1		505 TENTH AVE	1	MD	2.015	2.015	2.015	12.1	2.4
159	5		EIGHTH & MARION	1	MD	0.941	0.941	0.941	5.6	1.1
167	4		EIGHTH AVE	1	MD	2.246	2.246	2.246	13.5	2.7
							<b>TOTAL DEVELOPABLE ACRES</b>	<b>46.912</b>	<b>281.5</b>	<b>56.3</b>
								<b>Round Up</b>	<b>57.0</b>	

This results in a realistic development potential (RDP) of 57 units.

## F. CONCLUSION

After excluding the properties by the specified criteria, there are two (2) properties that are vacant and have the ability to be serviced by public water and sewer with the period of certification (2025-2035). The realistic development potential (RDP) for the these properties is 5 affordable units.

## **Appendix 1**

### **Existing Land Use Map**



## **Appendix 2**

### **Environmental Constraints Map**