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# 2025 Housing Element & Fair Share Plan

Township of Monroe

June 12, 2025

Prepared for:

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Gloucester County

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# 2025 Housing Element & Fair Share Plan

## Township of Monroe

Gloucester County, New Jersey

Adopted by the Planning Board: \_\_\_\_\_

Endorsed by the Township Council: \_\_\_\_\_



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The original of this report was signed and sealed in accordance with NJSA 45:14A-12.

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# I. Introduction

According to the New Jersey Fair Housing Act of 1985 (L. 1985, c. 222, s. 1, eff. July 2, 1985), a Housing Plan Element shall 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.

This is the Township of Monroe's Housing Element and Fair Share Plan ("HEFSP") for the period between 2025 and 2035 (known as the Fourth Round). Monroe Township seeks to voluntarily comply with its constitutional obligation to provide a realistic opportunity for affordable housing. This HEFSP is prepared utilizing the Prior Round Rules<sup>1</sup>, Third Round Rules<sup>2</sup> (as applicable), and the amendments implemented in P.L. 2024, c.2. Each municipality in the State has a four-part obligation:

1. Present Need (Rehabilitation Obligation)
2. Prior Round Obligation (1987-1999)
3. Third Round Obligation (1999-2025)
4. Fourth Round Prospective Need Obligation (2025-2035)

## Affordable Housing History

### Mount Laurel Doctrine

Affordable housing planning in New Jersey dates back to 1975, when the New Jersey Supreme Court ruled in Southern Burlington County NAACP v. the Township of Mount Laurel, 67 N.J. 151 (1975), 336 (Mount Laurel I), that each municipality within New Jersey has a constitutional obligation to provide a realistic opportunity for the construction of their fair share of affordable housing. Mount Laurel I is the landmark decision that created what is commonly referred to as the "Mount Laurel Doctrine". The Supreme Court found that Mount Laurel Township's zoning ordinance only permitted one type of housing—single-family detached dwellings, while all other types of multi-family housing, such as garden apartments, townhomes, or mobile home parks, were prohibited, which the court determined resulted in economic discrimination and exclusion of substantial segments of the area population, and therefore the zoning ordinance was unconstitutional and invalid.

In 1983, the New Jersey Supreme Court issued Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158 (1983), another monumental decision which became known as the "Mount Laurel II" decision. In this case, the Supreme Court upheld and expanded upon the Mount Laurel I decision. Mount Laurel II clarified that the constitutional obligation applies to all municipalities, not just the "developing" municipalities as referenced in Mount Laurel I. Each municipality is required to establish zoning that provides a realistic opportunity for the construction of affordable housing to comply with the municipality's fair share obligation. Mount Laurel II established the "Builder's Remedy" as a judicial mechanism to enforce the Mount Laurel Doctrine. A Builder's Remedy lawsuit allows a plaintiff (typically a developer) to challenge a municipality's zoning ordinance if it fails to create a realistic opportunity to provide affordable housing units to meet the constitutional fair share obligation.

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<sup>1</sup> N.J.A.C. 5:91 (Procedural) and N.J.A.C. 5:93 (Substantive) Rules. They can be found at: [New Jersey Department of Community Affairs | Second Round Regulations](#)

<sup>2</sup> N.J.A.C. 5:96 (Procedural) and N.J.A.C. 5:97 (Substantive) Rules, which can be found at: <https://nj.gov/dca/dlps/hss/thirdroundregs.shtml>

In 1985, the Fair Housing Act (“FHA”) was enacted in response to the court decisions, which provided an administrative process for municipal compliance. The FHA also created the New Jersey Council on Affordable Housing (“COAH”), which was the governmental agency responsible for promulgating municipal obligations, adopting regulations, and administering the compliance process.

### **Prior Rounds (1993-1999)**

Under COAH, the First Round of affordable housing spanned from 1987 to 1993, followed by the Second Round from 1993 to 1999. The First Round Substantive Rules were enacted under N.J.A.C. 5:92 and the Second Round Substantive Rules were enacted under N.J.A.C. 5:93.

### ***Monroe’s Prior Round Compliance***

12/14/1989	Planning Board adopted 1989 Housing Element and Fair Share Plan
1/15/1990	Township Council adopted resolution of participation of the HEFSP for COAH
10/28/1993	Planning Board readopted the HEFSP
11/8/1993	Township Council adopted resolution of participation of the HEFSP for COAH
3/7/1994	Township Council adopted resolution to achieve certification for its 1987-1999 obligation and amended its petition by filing Motion with COAH
6/1/1994	COAH adopted resolution allowing Township to amend its HEFSP to achieve certification
4/3/1995	Township adopted resolution to petition COAH for substantive certification
4/27/1995	Planning Board adopted amended HEFSP
6/2/1995	Township petitioned COAH for certification
12/6/1995	COAH granted Second Round Certification
12/21/2001	COAH extension of Second Round Certification
7/25/2005	COAH denied further extension of Second Round Certification
12/31/2008	Deadline to which COAH extended Second Round certification for all municipalities

### **Third Round (1999-2025)**

The Third Round of affordable housing commenced in 1999, which was supposed to end in 2018; however, due to numerous legal challenges and court orders, the Third Round was ultimately extended through 2025.

The first version of COAH’s Third Round Substantive Rules was enacted under N.J.A.C. 5:94 in 2004. This version of the rules was challenged and in January 2007 the Appellate Court issued a decision requiring COAH to revise its rules.

In October 2008, COAH adopted numerous amendments to its substantive and procedural regulations to address the Third Round fair housing requirements. The Third Round methodology,

adopted in September 2008, required that a municipality's fair share consist of three elements: the 1) rehabilitation share, 2) any remaining Prior Round obligation that was not provided for, and 3) the Growth Share or Third Round, which is based upon one affordable housing unit for every four market-rate units built and one affordable unit for every 16 new jobs created. In addition to these new rules, COAH assigned new rehabilitation, Prior Round and Third Round obligation numbers to each municipality. Additionally, the State legislature passed Assembly Bill A-500 (now P.L. 2008), which made significant changes to COAH's rules.

In 2009, appeals were filed regarding the new Third Round Rules' growth share methodology. The case worked its way through the Appellate Division and finally went before the Supreme Court. The Supreme Court issued a decision on September 26, 2013, finding that the key set of rules establishing the growth share methodology as the mechanism for calculating "fair shares" was inconsistent with the FHA and the Mount Laurel Doctrine. The Supreme Court instructed COAH "to adopt new third round rules that use a methodology for determining prospective need similar to the methodologies used in the first and second rounds," within five months, which was later extended to November 2014.

In July 2014, COAH proposed new Third Round under N.J.A.C. 5:98 and 5:99. However, the new rules were never formally adopted by COAH.

After COAH failed to promulgate its revised rules by the November 2014 deadline, the Supreme Court made a ruling on March 10, 2015 entitled In re: Adoption of N.J.A.C. 5:96 & 5:97 by the N.J. Council on Affordable Housing, 221 N.J. 1 (2015) (Mount Laurel IV), which allows for judicial review for constitutional compliance, as was the case before the FHA was enacted. The ruling allowed low- and moderate-income families and their advocates to challenge exclusionary zoning in court, rather than having to wait for COAH to issue rules that may never come. The process provided a municipality that had sought to use the FHA's mechanisms the opportunity to demonstrate constitutional compliance to a court's satisfaction before being declared noncompliant and then being subjected to the remedies available through exclusionary zoning litigation, including a builder's remedy.

The transitional process created by the Supreme Court tracked the FHA procedures for compliance. In this regard, the process permitted municipalities to file a Declaratory Judgment Action during a 30-day window between June 8 and July 8, 2015 that sought an adjudication as to their fair share. This would enable the municipality to comply voluntarily with its constitutional obligation to provide a realistic opportunity for the construction of its fair share of the regions' low- and moderate-income households.

On January 18, 2017, the Supreme Court decided In Re: Declaratory Judgment Actions Filed by Various Municipalities, County of Ocean, Pursuant to The Supreme Court's Decision In re: Adoption of N.J.A.C. 5:96, 221 N.J. 1 (2015) ("Mount Laurel V"), which held that municipalities are responsible for obligations accruing during the so-called "gap period," the period between 1999 and 2015. However, the Court stated that the gap obligation should be calculated as a never-before calculated component of Present Need (also referred to as Rehabilitation Obligation), which would serve to capture Gap Period households that were presently in need of affordable housing as of the date of the Present Need calculation (i.e. that were still income eligible, were not captured as part of traditional present need, were still living in New Jersey and otherwise represented a Present affordable housing need).

Between 2015 and 2024, municipalities that elected to voluntarily comply with their constitutional obligation participated in mediation sessions, reached settlement agreements, adopted Third Round Housing Element and Fair Share Plans, and most municipalities concluded the process with a Third

Round Judgment of Compliance and Repose ("Third Round JOR") from the courts. As a result of COAH's inability to function, the Third Round period spanned from 1999 to 2025, a 26-year long period as opposed to the 6-year periods for the first and second rounds. The Third Round is set to expire on June 30, 2025.

### ***Monroe's Third Round Compliance***

7/2005	Monroe petitioned COAH for Third Round Plan to remain under COAH jurisdiction
10/10/2007	NJ 322 LLC brought litigation over Monroe. (Block 14301, Lots 56 & 57); NJ 322 LLC litigation GLO-L-1636-07 Fairness Hearing held
12/31/2008	Monroe re-petitioned COAH with Amended HEFSP (Resolution # 260-2008)
3/3/2009	COAH declared HEFSP petition complete
4/14/2009	Monroe withdrew from COAH (Resolution #120-2009)
8/10/2009	Monroe/ NJ 322 LLC Settlement Agreement
8/16/2009	Court Masters Report re: NJ 322 LLC v. Monroe (Scotland Commons)
8/19/2010	Judge Rafferty Court Order – Settlement Agreement Complied with Third Round. GLC-L-000675-09-P.W., Blaze Mill Development Group LLC Final Judgment and Compliance Report
8/8/2012	Township and Blaze Mill Agreement, (maximum 250 units, in-lieu payment for 56 off-site affordable units @ 22.4% set-aside)
12/14/2012	Court Master Report re Blaze Mill Amended Settlement
7/15/2013	Blaze Mill Development Group, LLC v. Township of Monroe Final Judgment of Compliance and Repose and Order Approving Settlement Agreement
7/4/2015	Monroe files Declaratory Judgement documentation with Court
09/4/2015	Court Order granted temporary immunity from Mt. Laurel lawsuits
12/18/2015	Court Order extended compliance period to March 31, 2016
3/28/2016	Court Order compliance period to June 30, 2016
7/8/2016	Court extended submission date to September 15, 2016, and immunity to November 1, 2016
10/5/2016	Superior Court issued Declaratory Judgment of Compliance and Repose for 1999–2025 Housing Element and Fair Share Plan
3/16/2017	NJ Pinelands Commission approved Monroe Affordable Housing Ordinance 0:08-2017 amending Section 175-89

4/19/2017	Court confirmed satisfaction of conditions for Final Judgment of Compliance and Repose.
1/17/2018	Settlement Agreements with FSHC and Summerfields West fully executed.
1/30/2018	Fairness Hearing Held- Final Court Approving Settlement
2/23/2018	Court extends deadline for objections to March 10, 2018
3/26/2018	Township Council adopts Market to Affordable Housing Program
5/3/2018	Court Order issued approving FSHC Settlement Agreement and Developers Intervenor (Summerfields West) Consent Agreement

#### Fourth Round (2025-2035)

On March 20, 2024, Governor Murphy signed legislation that dramatically modified the State's affordable housing regulations. The 75-page bill, known as the A4/S50 Bill, abolished COAH, modified the process of affordable housing compliance, amended bonus credits, and, among other changes, set forth several important deadlines. P.L. 2024, c.2 amended the FHA (hereinafter the "Amended FHA") and charged the Department of Community Affairs ("DCA") with the preparation of Fourth Round obligations and set forth aggressive timelines for compliance. In October 2024, DCA published a report on its calculations of regional need and municipal present need (Rehabilitation Obligation) and prospective fair share obligations (Fourth Round Obligation). The report is entitled "Affordable Housing Obligation of 2025-2035 (Fourth Round) Methodology and Background".

The DCA calculated Monroe Township's Present Need (Rehabilitation) Obligation as **50 units** and its Fourth Round Prospective Need Obligation as **303 units**.

Municipalities were required to adopt a binding resolution outlining their present and prospective fair share obligations by January 31, 2025. On January 22, 2025, the Township Council adopted Resolution R:47-2025, accepting the DCA's calculations of the Township's Present Need Obligation of **50 units** and Fourth Round Prospective Need Obligation of **303 units**.

The Township also filed a "Complaint for a Declaratory of Compliance with the Fair Housing Act" on January 24, 2025 as part of the compliance certification process outlined in the Director of the Administrative Office of the Courts Directive #14-24.

During the 30-day challenge window, Monroe Township did not receive any challenges to the calculated obligations. The Honorable Robert G. Malestein, P.J.Ch. issued an order on April 21, 2025, ordering that Monroe Township's Present Need shall be 50 units and the prospective need for the Fourth Round housing cycle shall be 303 units (Docket No. GLO-L-115-25).

#### Municipal Summary

The Township of Monroe is in the northeastern section of Gloucester County in southern New Jersey. It is bordered by Camden County and Winslow Township to the north, Washington Township to the west, Franklin Township, Clayton Township and Glassboro to the south, and Buena Vista Township and Folsom Borough, in Atlantic County, to the east. The Township is situated between NJ State Highway Route 55 and the Atlantic City Expressway with access to the Atlantic City Expressway

at Exit 38. US Highway Route 322, also known as the Black Horse Pike, traverses the mid-section of the Township and continues southward to Atlantic City.

Monroe is the second largest municipality in Gloucester County encompassing 46.9 square miles. It is located southwest of the Wharton State Forest and includes part of the Winslow Fish and Wildlife Management Area within its boundaries. The Pinelands Management Area covers about two-thirds of the Township.

According to the 2005 Open Space and Recreation Plan, Monroe Township has 4,540 acres preserved through the Green Acres Program, 294 acres preserved by Gloucester County Fish and Wildlife, 128 acres as Gloucester County Scotland Run Park, and 142 acres in Township recreative and conservation. About 20% of the Township covers identified wetlands, water and barren lands<sup>3</sup>.

As described in the 2004 Master Plan, "Monroe Township contains a diverse land use pattern, containing older, well-established neighborhoods, recently developed suburban area, rural areas, productive agriculture areas and extensive woodland and wetland areas. Significant commercial development exists along the Black Horse Pike."<sup>4</sup>

Between 2010 and 2020, Monroe's population increased by almost 3% from 36,129 to 37,117<sup>5</sup>. The Delaware Valley Regional Planning Commission (hereinafter "DVRPC"), projects that Monroe Township will grow by an additional 7,478 residents (16.7%) resulting in a total projected population of 44,595 by the year 2050<sup>6</sup>. To achieve a residential population of 44,595, Monroe would need to add 250 residents each year between 2020 and 2050. Between 2010 and 2020, the Township added an average of 99 residents per year.

## Affordable Housing Goals

It is the overall goal of the HEFSP, in combination with the Land Use Plan, to provide the planning context in which access to low and moderate-income housing can be provided in accordance with the requirements of the Amended Fair Housing Act and the laws of the State of New Jersey, while respecting the character and density of Monroe Township.

### ***Master Plan Goals***

The Township's 2004 Master Plan established specific Housing Plan goals and objectives as follows:

- GOAL: Guide future development and community facilities to meet the needs of the residents of the Township, while ensuring that new development is compatible with existing development without degrading the Township's cultural and natural resources.
- OBJECTIVE: To ensure decent and affordable housing for all present and future residents of the Township, without regard of their economic status by providing for a full range of

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<sup>2</sup> Open Space and Recreation Plan, Monroe Township, Gloucester County, New Jersey, January 2005, page 2.

<sup>4</sup> Monroe Township Master Plan 2004 adopted September 2004, page 7.

<sup>5</sup> [www.census.gov](http://www.census.gov)

<sup>6</sup> <https://www.dvrpc.org/reports/adr21014.pdf>

housing choices that are affordable to low-, moderate-, middle- and upper-income households.

### Affordable Housing Obligation

Monroe Township's four-part affordable housing obligation is as follows:

1. Present Need (Rehabilitation Obligation): 50 units
2. Prior Round Obligation: 439 units
3. Third Round Obligation: 400 units
4. Fourth Round Prospective Need Obligation: 303 units

## HOUSING ELEMENT

### II. Required Content of Housing Element

The Amended Fair Housing Act requires that “the housing element 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”. As per the Municipal Land Use Law (hereinafter “MLUL”), specifically N.J.S.A. 52:27D-310, a housing element must contain at least the following items:

- 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 conducting this 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, considering, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands.
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age.
- d. An analysis of the existing and probable future employment characteristics of the municipality.
- e. A determination of the municipality's present and prospective fair share for low- and moderate-income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low- and moderate-income housing, as established pursuant to section 3 of P.L.2024, c.2 (C.52-27D-304.1).
- f. A consideration of the lands that are most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low- and moderate-income housing, including a consideration of lands of developers who have expressed a commitment to provide low- and moderate-income housing.
- g. An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.52D-329.20).
- h. For a municipality located within the jurisdiction of the Highlands Water Protection and Planning Council, established pursuant to section 4 of P.L.2004, C.120 (C.13-20-4), an analysis of compliance of the housing element with the Highlands Regional Master Plan of lands in the Highlands Preservation Area, and lands in the Highlands Planning Area for Highlands-

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

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

### III. Population Demographics

#### Population Growth

The Township of Monroe's population rose rapidly from 5,531 people in 1950 to 21,639 in 1980, which is a 291.2% increase over just 30 years. The Township's population continues to rise to its current peak at 37,391 residents in 2023. See the table below for additional details.

**Population Growth**

Year	Population	Change	Percent
1940	4,310	--	--
1950	5,531	1,221	28.3%
1960	9,396	3,865	69.9%
1970	14,071	4,675	49.8%
1980	21,639	7,568	53.8%
1990	26,703	5,064	23.4%
2000	28,967	2,264	8.5%
2010	36,129	7,162	24.7%
2020	37,117	988	2.7%

Source: 2010 & 2020 Census Table P1; New Jersey Population Trends, 1790 to 2000,  
<https://www.nj.gov/labor/labormarketinformation/assets/PDFs/census/2kpub/njsdcp3.pdf>

The Delaware Valley Regional Planning Commission (DVRPC) projects that the Township's population will increase by 13.8% from 37,117 in 2020 to 44,595 in 2050. This represents an average increase of approximately 250 residents annually over 30 years. However, as noted above, the Township's estimated population according to the 2023 ACS is 37,391, which is 476 more than projected by the DVRPC. This translates to an average annual gain of 267 people over the next 27 years.

**Population Projection**

Year	Population	Change	Percent
2020	37,117	---	---
2030**	37,834	717	1.9%
2040**	39,200	1,366	3.6%
2050**	44,595	5,395	13.8%

Source: Population Projections from Delaware Valley Regional Planning Commission (DVRPC)  
<https://www.dvrpc.org/reports/adr018-a.pdf>

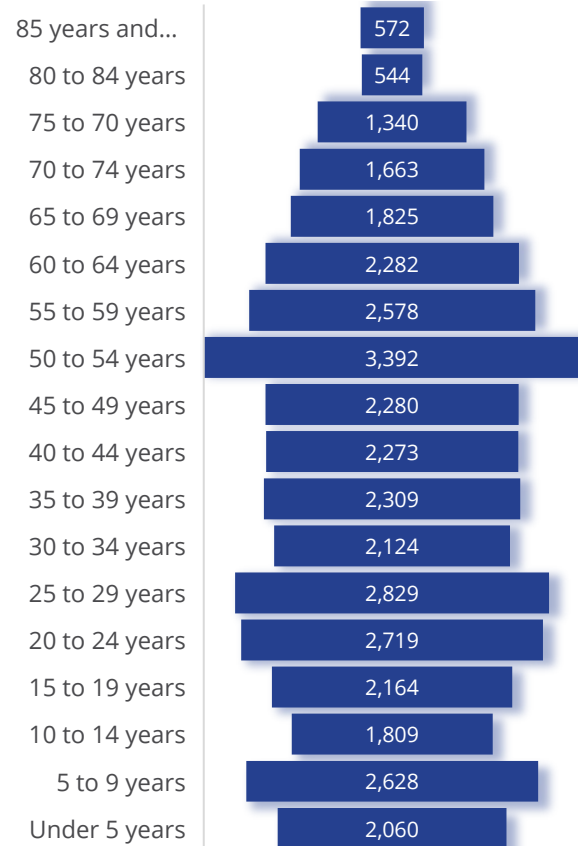
## Age Distribution of Population

The 2023 ACS estimates 15.9% of Monroe's population was 65 years or older compared to 23.2% of the population being 19 years or younger. The largest age cohort was estimated to be those aged 50 to 54 years, which comprised 9.1% (3,392) of the Township's population. Residents aged 25 to 29 years comprised the second-largest age cohort at 7.6% (2,829) of the population, followed by residents aged 20 to 24 years at 7.3% (2,719). The median age was estimated at 40.1 years in the 2023 ACS. See the table and chart below for further details.

Age	Total	Percent
Under 5 years	2,060	5.5%
5 to 9 years	2,628	7.0%
10 to 14 years	1,809	4.8%
15 to 19 years	2,164	5.8%
20 to 24 years	2,719	7.3%
25 to 29 years	2,829	7.6%
30 to 34 years	2,124	5.7%
35 to 39 years	2,309	6.2%
40 to 44 years	2,273	6.1%
45 to 49 years	2,280	6.1%
50 to 54 years	3,392	9.1%
55 to 59 years	2,578	6.9%
60 to 64 years	2,282	6.1%
65 to 69 years	1,825	4.9%
70 to 74 years	1,663	4.4%
75 to 79 years	1,340	3.6%
80 to 84 years	544	1.5%
85 years and over	572	1.5%
<b>Total</b>	<b>37,391</b>	<b>100%</b>

Source: 2023 ACS Table S0101

### Population by Age Cohort



## Household Size & Type

According to the 2023 ACS, Monroe had 13,996 households of various types. A plurality were married-couple households, which comprised 46.8% of all households (6,556). Of those, 2,624 had children under 18 years old. Female householders with no spouse present comprised 31.5% of all households, while male householders with no spouse present comprised only 15.7%. Of all households with no spouse present, 1,175 had children under the age of 18 (8.4%), while 3,914 were living alone (28.0%). See the table on the following page for complete details.

### Household Type

Type	Number	Percent
Married-couple	6,556	46.8%
with children under 18	2,624	18.7%
Cohabiting couple	845	6.0%
with children under 18	256	1.8%
Male householder, no spouse	2,193	15.7%
with children under 18	372	2.7%
living alone	1,223	8.7%
Female householder, no spouse	4,402	31.5%
with children under 18	803	5.7%
living alone	2,691	19.2%
<b>Total</b>	<b>13,996</b>	<b>100%</b>

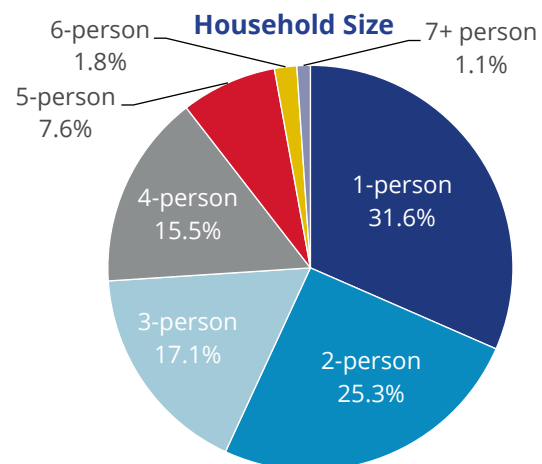
Source: 2023 ACS Table DP02

The most common household size in Monroe was estimated to be one-person households, which comprised 31.6% of households in 2023. Two-person households comprised the second-largest number of households at 25.3%. Finally, three-person households comprised 17.1% of the 14,729 households in Monroe. It should be noted that 158 households contained seven or more people. The table and pie chart below graphically illustrate the household size composition in Monroe. Additionally, the 2023 ACS estimated the average household size at 2.66 persons, which is slightly lower than reported in the 2010 Census (2.80 persons).

### Household Size

Size	Total	Percent
1-person	4,647	31.6%
2-person	3,732	25.3%
3-person	2,516	17.1%
4-person	2,288	15.5%
5-person	1,126	7.6%
6-person	262	1.8%
7+ person	158	1.1%
<b>Total</b>	<b>14,729</b>	<b>100%</b>

Source: 2023 ACS Table B11016



Income & Poverty Status

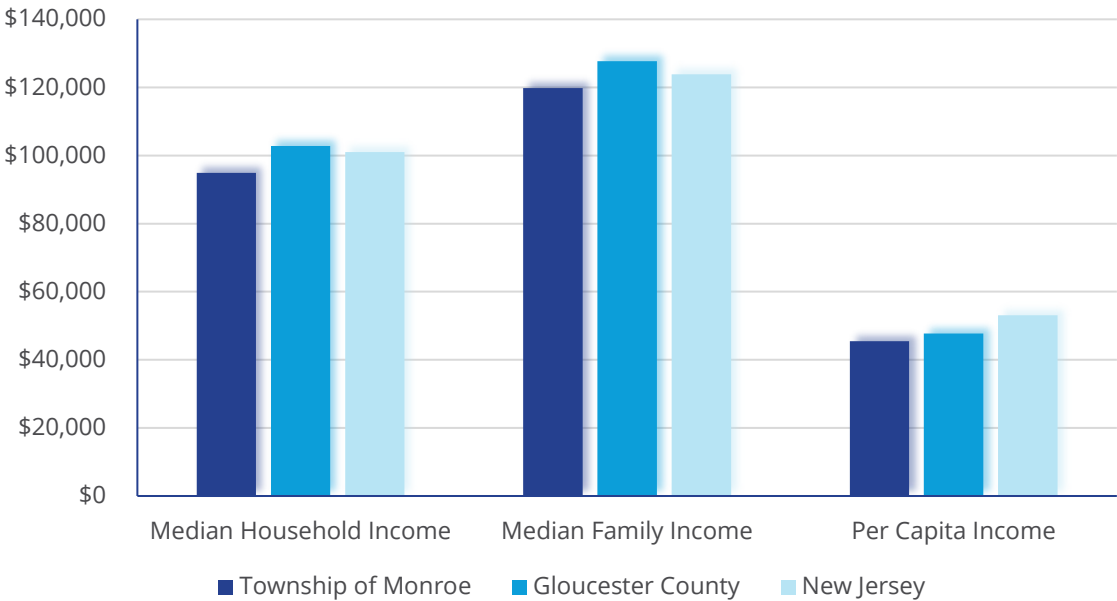
The 2023 ACS estimated the median household income for the Township of Monroe to be \$94,857 which is almost \$8,000 less than Gloucester County's and \$6,193 less than the State's. Similarly, the median family income for the Township was estimated at \$119,829, which is almost \$8,000 below the County's and \$4,063 less than the State's. Finally, Monroe's per capita income was estimated at \$45,496, which is below both the County's and the State's. Based on this data, residents of Monroe are not as well-off than Gloucester County and New Jersey residents. The 2023 ACS reports on the poverty rates of individuals and families. The Township's poverty rate for individuals was estimated at 6.7%, which is lower than the County's by 2.2% and 2.1% lower than the State's. Similarly, the Township's poverty rate for families was estimated at 3.5%, which is less than Gloucester County's and 3.6% less than New Jersey's. The table and bar chart below provide a comparison between income and poverty characteristics.

Income and Poverty Characteristics

Income Type	Township of Monroe	Gloucester County	New Jersey
Median Household Income	\$94,857	\$102,807	\$101,050
Median Family Income	\$119,829	\$127,695	\$123,892
Per Capita Income	\$45,496	\$47,760	\$53,118
Poverty Status (Percent of People)	6.7%	8.9%	9.7%
Poverty Status (Percent of Families)	3.5%	5.6%	7.1%

Source: 2023 ACS Table DP03 & S1701 & S1702

Income Characteristics



According to the 2023 ACS, 14.1% of households in Monroe (1,978) earn between \$50,000 and \$74,999 annually. Households earning between \$100,000 and \$149,999 comprised 18.2% of households, while those earning \$35,000 to \$49,999 comprised 6.8% of the Township's households. Only 48.1% of households in Monroe made over \$100,000 annually compared to 51.5% of the County's and 50.4% of the State's households. It should be noted that 25.6% of households in Monroe earned less than \$50,000. See the table below for additional details.

#### Household Income

Income Range	Township of Monroe		Gloucester County		New Jersey	
	Total	Percent	Total	Percent	Total	Percent
Less than \$10,000	748	5.3%	3,591	3.2%	140,262	4.0%
\$10,000 to \$14,999	453	3.2%	2,279	2.0%	99,362	2.9%
\$15,000 to \$24,999	595	4.3%	5,269	4.7%	175,402	5.0%
\$25,000 to \$34,999	831	5.9%	5,659	5.1%	184,753	5.3%
\$35,000 to \$49,999	953	6.8%	8,409	7.5%	276,601	8.0%
\$50,000 to \$74,999	1,978	14.1%	15,720	14.1%	448,192	12.9%
\$75,000 to \$99,999	1,704	12.2%	13,305	11.9%	397,939	11.4%
\$100,000 to \$149,999	2,551	18.2%	22,593	20.2%	627,526	18.0%
\$150,000 to \$199,999	1,962	14.0%	15,228	13.6%	407,723	11.7%
\$200,000 or more	2,221	15.9%	19,743	17.7%	720,595	20.7%
<b>Total</b>	<b>13,996</b>	<b>100%</b>	<b>111,796</b>	<b>100%</b>	<b>3,478,355</b>	<b>100%</b>

## IV. Housing Demographics

### Housing Type

The 2023 ACS estimated the Township's housing stock at 14,508 units, which contains a variety of residential dwelling types. Single-family, detached dwellings comprised most of the housing stock with 10,575 units or 72.9% of all dwellings. There were an estimated 955 multi-family dwelling units (6.58%) in structures containing five or more units. Attached single-family dwellings (e.g. townhomes) comprised 952 units or 6.6% of the housing stock. See the table below for details.

**Housing Units in Structure**

Structure	Number of Units	Percent
1-unit, detached	10,575	72.9%
1-unit, attached	952	6.6%
2 units	328	2.3%
3 or 4 units	465	3.2%
5 to 9 units	197	1.4%
10 to 19 units	201	1.4%
20 or more units	557	3.8%
Mobile Home	1233	8.5%
Other (boat, RV, van, etc.)	0	0.0%
<b>Total</b>	<b>14,508</b>	<b>100%</b>

Source: 2023 ACS Table DP04

### Occupancy Status

Of the 14,508 residential units, 13,996 units, or 96.5% of the housing stock, was occupied. This includes 11,504 owner-occupied units and 2,492 rental units. The 512 vacant units included 120 units sold but not occupied and 134 units listed for rent or for sale. The remainder of the vacant units, 242, were categorized as "other" vacant. See the table on the following page for details.

The 2023 ACS estimated the average household size in Monroe at 2.66 persons, while the average family size was 3.26 persons. Comparing tenure, the average owner-occupied household was 2.72, while the average renter-occupied household was 2.34 persons.

### Occupancy Status

Status	Units	Percent
Occupied Total	13,996	96.5%
Owner Occupied	11,504	82.2%
Renter Occupied	2,492	17.8%
Vacant Total	512	3.5%
For rent	68	13.3%
Rented, not occupied	16	3.1%
For Sale	66	12.9%
Sold, not occupied	120	23.4%
Seasonal	0	0.0%
For migrant workers	0	0.0%
Other	242	47.3%
<b>Total</b>	<b>14,508</b>	<b>100%</b>

Source: 2023 ACS Tables DP04 & B25004

### Value & Rent of Housing Stock

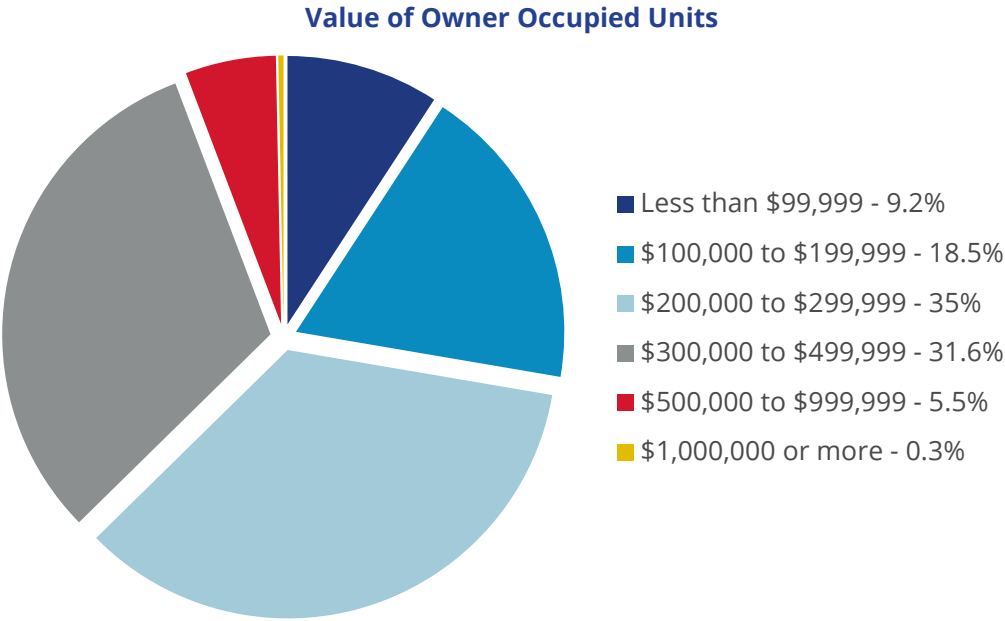
The 2023 ACS provided value estimates for owner-occupied housing units in Monroe. According to the data, a plurality of homes in the Township were worth between \$200,000 and \$299,999 (35.0%). Homes worth between \$300,000 and \$499,999 comprised 31.6% of the owner-occupied housing units, while 18.5% of homes were estimated to be worth between \$100,000 to \$199,999. It should be noted that 36 homes (0.3%) were valued at \$1 million or more and 1,059 homes were valued less than \$99,999 (9.2%). The median home value estimated in the 2023 ACS was \$264,600. See the table below and chart on the following page for details.

### Value of Owner Occupied Units

Value	Number of Units	Percent
Less than \$99,999	1,059	9.2%
\$100,000 to \$199,999	2,126	18.5%
\$200,000 to \$299,999	4,022	35.0%
\$300,000 to \$499,999	3,633	31.6%
\$500,000 to \$999,999	628	5.5%
\$1,000,000 or more	36	0.3%
<b>Total</b>	<b>11,504</b>	<b>100%</b>

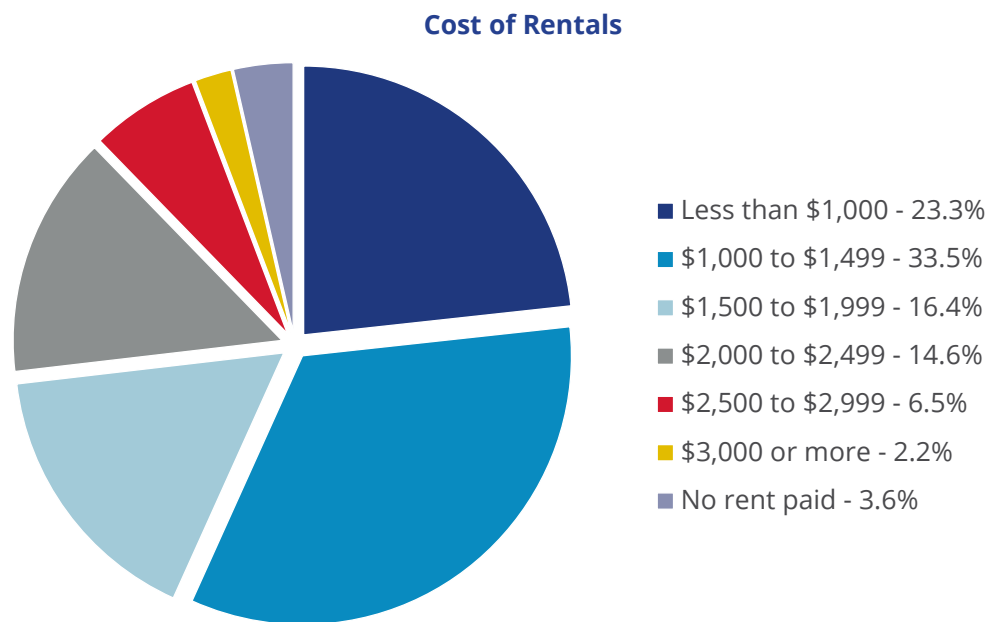
Median Value \$264,600

Source: 2023 ACS Table DP04



The median rent in the Township was estimated at \$1,369 per the 2023 ACS. Looking at the rent ranges, units that cost between \$1,000 and \$1,499 were most common with 834 rentals in this range. Units with rents less than \$1,000 were the second-most common rental range, with 580 units or 23.3%. Rentals that cost between \$1,500 and \$1,999 included 409 units (16.4%), while 55 units cost \$3,000 or more per month (2.2%). It should be noted that 89 rentals indicated no rent was paid. See the table below and chart on the following page for more information.

Cost of Rentals		
Cost	Number of Units	Percent
Less than \$1,000	580	23.3%
\$1,000 to \$1,499	834	33.5%
\$1,500 to \$1,999	409	16.4%
\$2,000 to \$2,499	363	14.6%
\$2,500 to \$2,999	162	6.5%
\$3,000 or more	55	2.2%
No rent paid	89	3.6%
Total	2,492	100%
Median (in dollars)	\$1,369	
Source: 2023 ACS Table DP04		



**Condition of Housing Stock**

The Census does not classify housing units as standard or substandard, but it can provide an estimate of the substandard housing units that are occupied by low- and moderate-income households. The Appellate Division upheld COAH’s use of three indicators to determine substandard housing in the State. Those three indicators are:

- Houses built before 1970, and which are overcrowded with more than one person per room.
- Homes lacking complete plumbing.
- Homes lacking kitchen facilities.

In general, most homes contain complete plumbing and kitchen facilities and have adequate heat. However, 17 units (0.12%) were estimated to not used fuel for heating (gas, oil, liquid propane, wood, etc.). Additionally, 22 units lacked plumbing facilities, and 54 units lacked kitchen facilities.

Condition of Housing Stock		
Condition	Number of Units	Percent
Lack of complete plumbing	23	0.16%
Lack of complete kitchen	54	0.39%
Lack of telephone service	217	1.55%
Lack of adequate heat	17	0.12%
Total Occupied Housing Units	13,996	2.22%

Source: 2023 ACS Table DP04

Housing with 1.01 or more persons per room is an index of overcrowding as defined by the U.S. Department of Housing and Urban Development. According to the 2023 ACS, 112 units (0.8%) of the Township's 13,996 occupied units contained 1.01 or more persons per room.

#### Occupants Per Room

Occupants	Number of Units	Percent
1.00 or less	13,884	99.2%
1.01 to 1.50	46	0.3%
1.51 or more	66	0.5%
<b>Total</b>	<b>13,996</b>	<b>100%</b>

Source: 2023 ACS Table DP04

Research has demonstrated that units built 50 or more years ago (i.e. 1975 or earlier) are much more likely to be in substandard condition. Included in the rehabilitation calculation are overcrowded units and dilapidated housing as discussed above.

The table and bar graph on the following page provide the 2023 ACS estimates for the age of housing units in Monroe. An estimated 3,232 units, or 22.3%, of the Township's housing stock, were constructed prior to 1970. During the 1960s, 1,375 homes were constructed in Monroe, followed by 3,108 new homes during the 1970s. Since 2010, new residential development has slowed in the Township with only 1,481 homes constructed. The Township's Rehabilitation Obligation is 50 units, which reflects the relatively good condition of the older homes.

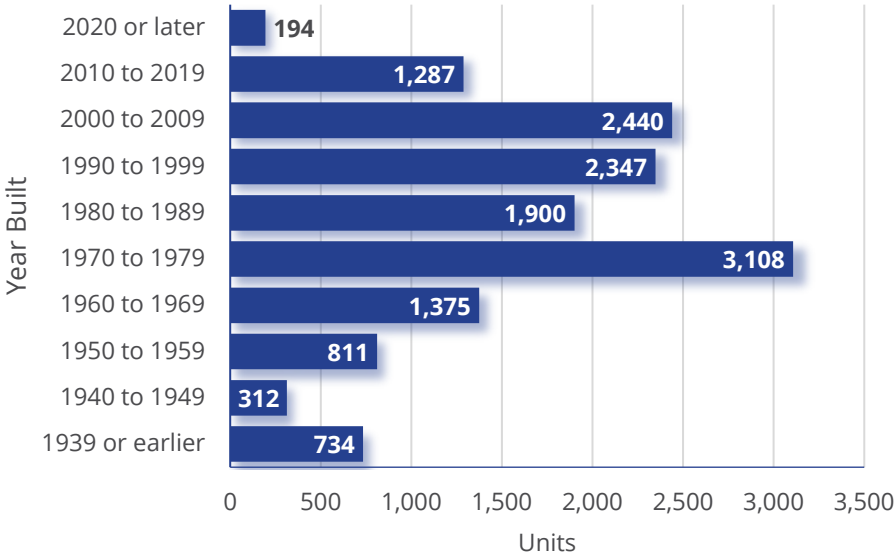
It should be noted that the "2020 or later" line item may be inaccurate. The New Jersey Department of Community Affairs' ("DCA"), Division of Codes and Standards website provides data on building permits, certificates of occupancy, and demolition permits for both residential and non-residential development. We have reviewed the data from the State for 2020 through 2024 and only 148 certificates of occupancy have been issued for new residential units, including single-family and two-family units, since the beginning of 2020. See the tables on page 25 for additional details.

Age of Housing Stock

Year Built	Number of Units	Percent
1939 or earlier	734	5.1%
1940 to 1949	312	2.2%
1950 to 1959	811	5.6%
1960 to 1969	1,375	9.5%
1970 to 1979	3,108	21.4%
1980 to 1989	1,900	13.1%
1990 to 1999	2,347	16.2%
2000 to 2009	2,440	16.8%
2010 to 2019	1,287	8.9%
2020 or later	194	1.3%
Total	14,508	100%

Source: 2023 ACS Table DP04

Age of Housing Stock



## V. Employment Demographics

The 2023 ACS estimated that Monroe had 20,480 residents over the age of 16 in the workforce. Of those, 19,390 (94.7%) were employed, which translates to a 5.3% unemployment rate. Most workers were private wage and salary workers (74.5%). Government workers comprised 16.8% of the workforce, while self-employed workers comprised 3.3%. See the table below for details.

**Class of Workers**

Class	Workers	Percent
Private wage and salary workers	15,265	74.5%
Government workers	3,432	16.8%
Self-employed workers	685	3.3%
Unpaid family workers	8	0.0%
<b>Total employed residents</b>	<b>19,390</b>	<b>94.7%</b>
Total unemployed residents	1,090	5.3%
<b>Total residents in workforce</b>	<b>20,480</b>	<b>100%</b>

Source: 2023 ACS Table DP03

## Occupational Characteristics

The 2023 ACS estimated 9,034 workers were employed management, business, science, and arts fields, which represents 46.6% of the Township's employed residents. Service workers totaled 12.9% of employed residents, while 20.9% were employed in sales and office positions. See the table below for details.

**Occupation of Employed Population**

Occupation	Workers	Percent
Management, business, science, & arts	9,034	46.6%
Service	2,505	12.9%
Sales & office	4,046	20.9%
Natural resources, construction, & maintenance	1,812	9.3%
Production, transportation, & material moving	1,993	10.3%
<b>Total</b>	<b>19,390</b>	<b>100%</b>

Source: 2023 ACS Table DP03

## Employment Projections

DVRPC estimates that the number of available jobs in Monroe will increase from 10,350 reported in 2020 to 13,219 in 2050. This represents an increase of 2,869 jobs, or an average increase of approximately 96 jobs annually. However, as detailed in the following section, the New Jersey Department of Labor and Workforce Development estimated a total of 7,588 jobs in Monroe in 2023, which is 3,050 less than projected by DVRPC.

### Employment Projection

Year	Jobs	Change	Percent
2020	10,350	---	---
2050	13,219	2,869	27.7%

Source: Population Projections from Delaware Valley Regional Planning Commission (DVRPC)  
<https://www.dvrpc.org/reports/adr018-a.pdf>

## In-Place Employment by Industry

New Jersey's Department of Labor and Workforce Development ("NJDLWD") is the entity that reports on employment and wages within the State of New Jersey through the Quarterly Census of Employment and Wages ("QCEW"). The latest Municipal Report was completed in 2023. According to the data, there were 6,394 private sector jobs within Monroe, which were provided by an average of 717 employers. It should be noted that the Municipal Report redacted data from multiple private-sector industries for not meeting publication standards (transportation/warehousing, management, arts/entertainment, etc.). The "Private Sector Total" row in the table on the following page provides the totals for the reported data only. However, the 2023 QCEW reported that Monroe had an average of 6,932 private-sector jobs provided by 748 employers, including the redacted data. It should be noted that the QCEW data reflects employment within the Township, regardless of where the employee lives.

Based on the 2023 QCEW data provided, the retail trade had the greatest number of workers with an average of 1,979 jobs (26.1%) and had the second-the greatest number of employers (91). The accommodations/food industry employed 883 workers (second-the greatest number of jobs), or 11.6%, provided by 54 employers. The health/social industry had 820 workers (third-greatest number of jobs) and had the greatest number of employers (157). In the public sector, the 2023 QCEW Municipal Report indicated that there were two federal government employers, which provided 103 jobs. Additionally, there were two state government employers providing 11 jobs and 14 local government employers providing 1,080 jobs. This included eight local government education employers providing an average of 802 jobs. See the table on the following page for data on each industry sector.

### Private and Public Sector Employment (2023)

Industry	Establishments		Employees		Annual Wages
	Total	Percent	Total	Percent	
Construction	117	15.9%	796	10.5%	\$72,493
Manufacturing	39	5.3%	422	5.6%	\$53,874
Wholesale Trade	22	3.0%	175	2.3%	\$51,742
Retail Trade	91	12.4%	1,979	26.1%	\$42,594
Transportation/Warehousing	-	-	-	-	-
Finance/Insurance	19	2.6%	91	1.2%	\$67,276
Real Estate	15	2.0%	67	0.9%	\$54,129
Professional/Technical	46	6.3%	143	1.9%	\$62,040
Management	.	-	-	-	-
Admin/Waste Remediation	47	6.4%	597	7.9%	\$55,482
Education	11	1.5%	99	1.3%	\$24,795
Health/Social	157	21.4%	820	10.8%	\$42,192
Arts/Entertainment	.	-	-	-	-
Accommodations/Food	54	7.3%	883	11.6%	\$23,353
Other Services	71	9.7%	288	3.8%	\$39,622
Unclassifieds	28	3.8%	34	0.5%	\$36,329
<b>Private Sector Total</b>	<b>717</b>	<b>97.6%</b>	<b>6,394</b>	<b>84.3%</b>	<b>\$55,164</b>
Federal Government	2	0.3%	103	1.4%	\$71,695
State Government	2	0.3%	11	0.1%	\$75,051
Local Government	14	1.9%	1,080	14.2%	\$69,938
Local Government Education	8	1.1%	802	10.6%	\$69,268
<b>Public Sector Total</b>	<b>18</b>	<b>2.4%</b>	<b>1,194</b>	<b>15.7%</b>	<b>\$71,488</b>

Source: The table values above are sourced from the NJDLWD's QCEW 2023 Municipal Report. It is noted that this Report has redacted multiple private sector industries for not meeting the publication standard. Therefore, the Private Sector Totals row has been calculated by this office using the published numbers.

## Travel Time to Work

The 2023 ACS collected data regarding employed resident's commute time. The most common commute time was between 45 and 59 minutes, which was made by 1,257 workers (15.7%). A commute between 30 and 34 minutes was second-most common commute with 2,505 workers (14.8%). Rounding off the top three was a commute of 20 to 24 minutes, which was reported by 1,990 workers (11.8%). The mean travel time was estimated at 33.5 minutes. It should be noted that 2,077 workers (12.3%) reported a commute of more than one hour. Additionally, 2,031 workers, or 10.73% of the Township's employed residents, reported working from home. See the table and chart on the following page for additional details.

## Commute Time

Travel Time (minutes)	Workers	Percent
Less than 5	666	3.9%
5 to 9	1,117	6.6%
10 to 14	1,490	8.8%
15 to 19	1,512	8.9%
20 to 24	1,990	11.8%
25 to 29	1,215	7.2%
30 to 34	2,505	14.8%
35 to 39	510	3.0%
40 to 44	1,164	6.9%
45 to 59	2,654	15.7%
60 to 89	1,257	7.4%
90 or more	820	4.9%
<b>Total</b>	<b>16,900</b>	<b>100.0%</b>

Source: 2023 ACS Table B08303

## VI. Projection of Housing Stock

As per the MLUL, specifically N.J.S.A. 52:27D-310, a housing element must contain a projection of the municipality's housing stock, including the probable future construction of low- and moderate-income housing for the next ten years, considering, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands.

The DCA Division of Codes and Standards website provides data on building permits, certificates of occupancy, and demolition permits for both residential and non-residential development through the New Jersey Construction Reporter. This database contains permit and certificate of occupancy information that is submitted by municipal construction officials across the State each month. The Construction Reporter has information dating back to 2000, which can be used to show the Township's historic development trends. However, data from 2013 and onward was reviewed to determine more recent trends.

As shown in the table below, there were 586 certificates of occupancy issued over this 12-year period. The most certificates of occupancy were issued in 2016, which included 89 certificates, and 2014 which included 87 certificates (second-most). During the same time, a total of 74 demolition permits were issued, which equates to a net development of 512 residential units.

**Historic Trend of Residential Certificates of Occupancy & Demolition Permits (2013-2024)**

	'13	'14	'15	'16	'17	'18	'19	'20	'21	'22	'23	'24	Total
COs Issued	80	87	34	89	65	34	49	63	57	4	2	22	586
Demolitions	6	12	6	0	0	15	7	1	3	4	12	8	74
<b>Net Development</b>	<b>74</b>	<b>75</b>	<b>28</b>	<b>89</b>	<b>65</b>	<b>19</b>	<b>42</b>	<b>62</b>	<b>54</b>	<b>0</b>	<b>-10</b>	<b>14</b>	<b>512</b>

Source: NJDCA, Construction Reporter - Housing Units Certified and Demolition Permits, Yearly Summary Data

Projecting into the future, the Township has identified 2,270 units as part of planned inclusionary projects that are either under construction or proposed that are anticipated to be constructed during the Fourth Round period.

## VII. Capacity for Fair Share

This chapter of the HEFSP provides the following information as required by the rules:

- The Township's capacity to accommodate its housing needs.
- 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.
- Lands of developers who have expressed a commitment to provide low- and moderate-income housing.
- The location and capacities of existing and proposed water and sewer lines and facilities relevant to the proposed affordable housing sites.

### Land Capacity

Monroe's capacity to accommodate its present and prospective affordable housing need is determined by three components - available land, water capacity and sewer capacity. Note that land development is limited by wetlands, flood plains, easements (conservation, sewer, water, etc.), parcel size and municipal regulations.

Monroe Township conducted a study of the remaining vacant lands and found that there is adequate land that is suitable and available to meet the affordable housing needs of the Township.

### Utility Capacity

The Monroe Township Municipal Utilities Authority ("MMUA") provides both water and sewer services to residents and businesses within the Township of Monroe. The MMUA maintains a comprehensive network of water and sewer lines, pumping stations, and other infrastructure to ensure reliable service.

### Wastewater Treatment Capacity

The MMUA provides sanitary sewerage service to developable areas within Monroe Township, except the section of the Township situated outside of the Pinelands Regional Growth District boundary line. The Gloucester County Utilities Authority ("GCUA") receives and treats the wastewater collected from 16 of the 24 municipalities in Gloucester County that constitute the Consolidated Region. In 2012, the Monroe Township Future Wastewater Service Area ("FWSA") was approved by the New Jersey Department of Environmental Protection ("NJDEP").

The GCUA has recently been reviewing their Wastewater Management Plan (WMP), which may result in modifications of the existing SSA in Monroe Township, as well as other municipalities in the Consolidated Region. Individual amendments of the SSA to accommodate future development may also be required on a case-by-case basis.

The Monroe MUA operates and maintains a local wastewater collection system that conveys the sewage to the GCUA conveyance system, from whence it is transported to the GCUA wastewater treatment plant in West Deptford Township. After treatment, the effluent water is discharged to the Delaware River.

The Township provides a local sewerage collection system with sewage being pumped to the GCUA. This sewage flow is treated at the GCUA facility receiving primary and secondary treatment through a biological process which removes more than 95% of the pollutants. The treated effluent is then discharged through a 72-inch diameter pipeline to the Delaware River. The end product of treatment, known as biosolids, is then incinerated on-site by one of GCUA's two existing incinerators.

Monroe is allocated 3.1 million gallons of wastewater per day (MGD) for conveyance to and treatment at the GCUA Plant. The average daily flow to the GCUA Plant over the past two years has been approximately 2.156 MGD. Therefore, about 0.944 MGD of surplus capacity remains to accommodate future development within the Township.<sup>7</sup>

## **Water Capacity**

The Monroe Township public water distribution system is owned and operated by the Monroe Municipal Utilities Authority (MMUA). Wells provide the primary source of water to the Township. There are eight regular production wells presently in service: six that draw water from the Kirkwood-Cohansey Aquifer and two from the Piney Point Aquifer. There are also two aquifer storage and recovery (ASR) wells for use in high demand times that operate from the Potomac-Raritan-Magothy (PRM) Aquifer. In addition to the wells, the MMUA has 6 water storage facilities that provide an overall storage capacity of 8.3 million gallons of water.

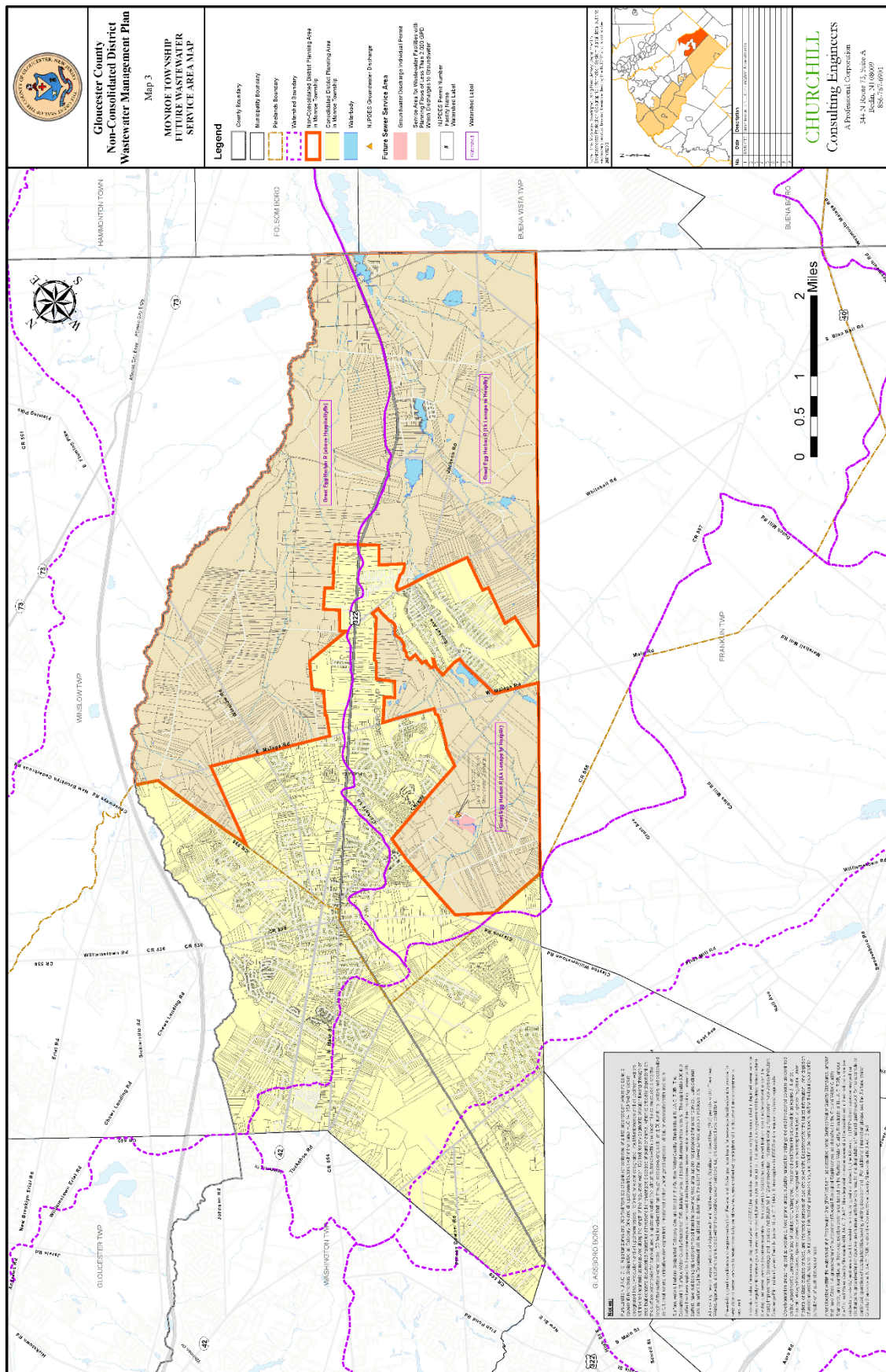
The MMUA also has a contractual agreement to purchase water through the Borough of Glassboro. That agreement stipulates limits of 0.492 MGD; 15.25 million gallons per month and 179.58 million gallons per year. In addition, there are emergency purchase agreements in place with the Borough of Clayton and Washington Township, in the rare event demands would exceed the available capacity of the Monroe MUA system.

The total current source capacity of the MMUA water system is 9.433 MGD. According to the NJDEP public water system website, the FIRM source capacity is 7.477 MGD, which assumes the largest well would be out-of-service. The current peak demand is 3.989 MGD with 2.414 MGD committed for approved projects. The current and committed flows result in a total peak demand of 6.403 MGD, leaving 4.074 MGD in surplus capacity.<sup>8</sup>

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<sup>7</sup> Jim Spratt, MMUA Engineer provided MMUA information via email June 12, 2025.

<sup>8</sup> NJDEP Public Water System Deficit/Surplus Report. <https://www.nj.gov/cgi-bin/dep/watersupply/pwsdetail.pl?id=0811002>.



## Appropriate Locations for Affordable Housing

Land that is most appropriate for the construction of low- and moderate-income housing includes the following properties being considered by the Township for designation as Areas in Need of Redevelopment:

- Hightop Redevelopment (Block 12503, Lots 16, 17, 18 and 19)
- Acme Shopping Center Redevelopment (Block 11301, Lots 1, 2, 2.01, 2.02, 3, 4, 5 and 6; Block 11301.02, Lots 20-23; and Block 11201, Lot 1).
- Williamstown Square Redevelopment Plan Area (Block 3601, Lots 11, 12, 13, 15, 16, 17, 18, 43, 44, 45, 46)

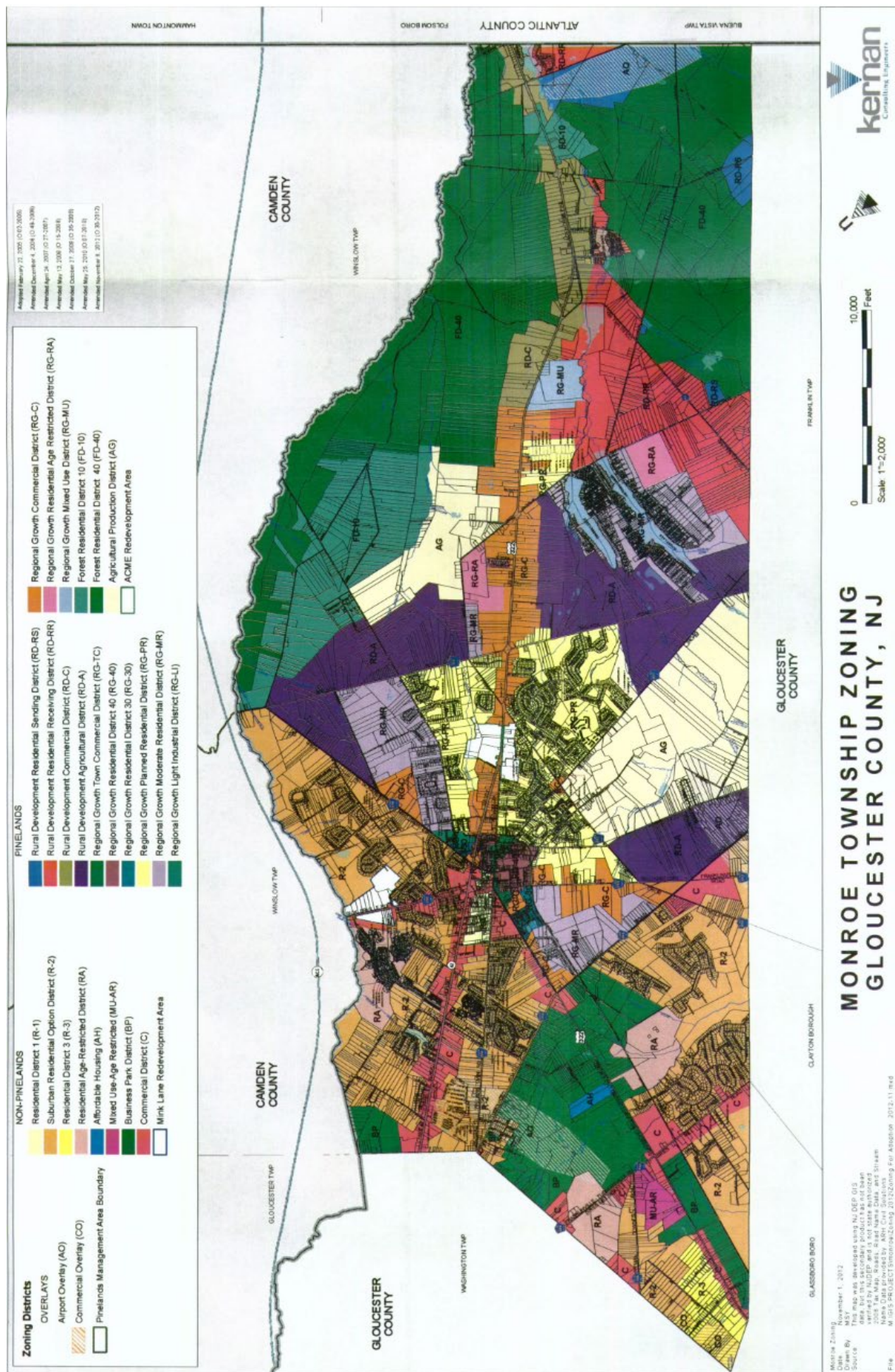
Existing structures appropriate for conversion to affordable housing include homes in foreclosures, which may be cost effective to buy and convert to affordable housing. As for structures suitable for rehabilitation, according to the Township's Rehabilitation Obligation, 50 homes within the Township need a major system repair (e.g. roof, electric, plumbing, etc.).

## Potential Affordable Housing Developers

The Township is currently working with several developers and redevelopers to construct affordable housing projects for the Fourth Round as identified in Chapter XI. No other developers have approached the Township to express any interest in developing affordable housing.

## Anticipated Development Patterns

Anticipated land use patterns within the Township of Monroe will most likely follow the established zoning map. The Pinelands Regional Growth Area will accommodate higher density housing. The only anticipated exceptions to the established land use pattern will be the inclusionary projects identified in Chapter XI.



## Multigenerational Family Continuity Evaluation

P.L. 2024, c.2 amended various aspects of the Fair Housing Act. These amendments modified the mandatory components of a municipality's housing element. NJSA 52:27D-310g. has been added, which states "An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c. 273 (C.52:27D-329.20)"

P.L. 2021, c.273 took effect on November 8, 2021. The law established the Multigenerational Family Housing Continuity Commission, which consists of a body of nine members. The duties of the Commission include the preparation and adoption of recommendations on how State government, local government, community organizations, private entities, and community members may most effectively advance the goal of enabling senior citizens to reside at the homes of their extended families, thereby preserving and enhancing multigenerational family continuity, through the modification of State and local laws and policies in the areas of housing, land use planning, parking and streetscape planning, and other relevant areas. The Law requires the Commission to report annually to the Governor on its activities, findings, and recommendations, if any, for State and local government. The Department of Community Affairs ("DCA") is required to provide staff services as may be needed for the Commission to carry out its responsibilities, including assembly of necessary information and statistics, and preparation of draft reports, analyses, and recommendations.

The State of New Jersey's website was reviewed on April 3, 2025. A search of the website revealed no webpage for the Multigenerational Family Housing Continuity Commission. As DCA is required to provide staff and research for the Commission, DCA's website was reviewed on April 3, 2025. DCA's website is silent regarding the Commission, its annual required reports, studies, and/or recommendations. Without recommendations from the Commission, Monroe is unable to conduct an analysis of its ordinances and other local factors. Despite the absence of recommendations, it should be noted that there is nothing in Monroe's zoning ordinance that prohibits senior citizens from residing at the home of their extended families.

## State Development & Redevelopment Plan Consistency

P.L. 2024, c.2 amended the Fair Housing Act to include a new requirement for housing elements. N.J.S.A. 52:27D-310i. reads, "An analysis of consistency with the State Development and Redevelopment Plan, including water, wastewater, stormwater, and multi-modal transportation based on guidance and technical assistance from the State Planning Commission."

The Draft State Development and Redevelopment Plan was approved by the State Planning Commission ("SPC") on December 4, 2024, and was released on December 6, 2024. The Office of Planning Advocacy ("OPA") conducted public hearings in each of New Jersey's 21 Counties between February 12, 2025 and April 16, 2025. Municipalities are tasked with completing Cross-Acceptance Response Template forms to determine a municipality's consistency with the Draft State Plan. The OPA anticipates collecting all Cross-Acceptance Response Template forms in the Summer of 2025. During this time, the OPA is accepting comments on the Draft Plan. The OPA anticipates releasing a Final Draft Plan and holding six additional public hearings in the Summer/Fall of 2025. The expected adoption of the Final Plan by the SPC is anticipated to be in the Winter of 2025.

As the document is a draft, the Township cannot opine on consistency until the final version is adopted. Monroe has not received guidance concerning water, wastewater, stormwater, or multi-modal transportation from the State Planning Commission.

## FAIR SHARE PLAN

### VIII. Required Content of 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.

## IX. 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 historically provided 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. Monroe is in Region 5, which contains Burlington, Camden, and Gloucester Counties.

Using the Affordable Housing Professionals of New Jersey’s latest chart on the regional income limits for Housing Region 5 in 2024, a four-person moderate-income household is capped at \$91,760. Two-person moderate-income households are capped at \$73,408, while two-person households could make up to \$45,880 to be considered a low-income household. The table below provides the median, moderate, low, and very-low-income limits for one-, two-, three-, and four-person households in Region 5.

2024 Regional Income Limits

Income	Household Size			
	1 Person	2 Person	3 Person	4 Person
Median	\$80,290	\$91,760	\$103,230	\$114,700
Moderate	\$64,232	\$73,408	\$82,584	\$91,760
Low	\$40,145	\$45,880	\$51,615	\$57,350
Very-Low	\$24,087	\$27,528	\$30,969	\$34,410

Source: [https://ahpnj.org/member\\_docs/Income\\_Limits\\_2024\\_FINAL.pdf](https://ahpnj.org/member_docs/Income_Limits_2024_FINAL.pdf)

## X. Monroe's Affordable Housing Obligation

This chapter outlines the four-part affordable housing obligation Monroe has been assigned.

### Present Need (Rehabilitation Obligation) | 50

Monroe Township accepted DCA's calculation of the present need (rehabilitation obligation) of 50 units for the Fourth Round.

N.J.A.C. 5:93-5.2(g) and (h) requires a minimum of \$8,000 for rehabilitation work (not including \$2,000 in administration fees) to be spent per unit and a six-year control on affordability for owner-occupied units.<sup>9</sup> Rental units are required to have ten-year controls on affordability. Additionally, a major system<sup>10</sup> must be repaired in order for a home to qualify as a credit.

### Prior Round (1987-1999) | 439

The Township of Monroe was granted Second Round Substantive Certification from COAH in 1999. Monroe has a Prior Round Obligation of 439.

### Third Round (1999-2025) | 400

The Township of Monroe settled with the Fair Share Housing Center in 2017 regarding its Third Round obligation and accepted an obligation of 400.

### Fourth Round (2025-2035) | 303

As indicated in the April 21, 2025 Decision and Order, the Township's Fourth Round Obligation is 303.

The Amended FHA modified the micro-requirement formulas for the Fourth Round obligation, as follows:

- Minimum 50% of the actual affordable units (exclusive of any bonus credits) available to families;
- Minimum 25% of the actual affordable units (exclusive of any bonus credits) as rental units;
- Half of the above as family rental units;
- Maximum 30% of the affordable units exclusive of any bonus credits) as age-restricted housing;
- and
- Maximum 25% of the obligation as bonus credits

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<sup>9</sup> The rules specifically require a maximum of \$2,000 per unit to be spent on administration and a minimum of \$8,000 per unit to be spent on the rehabilitation activity, which totals at least \$10,000.

<sup>10</sup> 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.

## XI. Mechanisms & Credits

This chapter provides the existing and proposed mechanisms and credits for each of the four affordable housing obligations.

### Rehabilitation Mechanisms & Credits

Gloucester County Planning Division, Office of Housing and Community Development has provided and supervised the rehabilitation of qualified owner-occupied housing units in Monroe Township through its Community Block Development Grant (CBDG) program. Since the County rehabilitation program is only available for owner-occupied units, the Township has also implemented a municipal housing rehabilitation program. The Township appointed Triad Associates to act as the Township's Administrative Agent and to administer its municipal housing rehabilitation program. As per the Township's Third Round Judgment of Compliance and Report, the Township is relying upon both the County and the Monroe Township housing rehabilitation programs to meet the rehabilitation obligations for the Township.

The Monroe Township housing rehabilitation program marketing is directed to property owners of rental and owner-occupied units; however, applications from rental property owners receive priority. Owner-occupied units will first be directed to the Gloucester County Housing Rehabilitation Program.

Eligible landlords of one to four unit buildings may be eligible for an interest free loan, which will be due when title to the property is transferred. The landlords are required to provide at least 50% of the total rehabilitation costs needed for each unit to meet State code and each unit must meet the major system repair or replacement requirement.

The rental rehabilitated units are affordability restricted with a 10-year deed restriction, attached to the mortgage and note. Loans are due when property is transferred, the deed restriction remains in effect for 10 years from the date of unit certification.

For owner-occupied units, the loans are interest-free and due when the property is transferred, or the owner-occupant dies before the loan repayment. If the unit changes owners, and the new owner agrees to rent to income-affordable households, a 10-year deed restriction must be imposed to keep the unit affordable.

Since the Fourth Round does not commence until July 1, 2025, there are currently no rehabilitation credits to be applied for the Fourth Round period.

### Prior Round Mechanisms & Credits

#### 1. Prior Cycle Credits

N.J.A.C. 5:93-3.2 permits municipalities to claim "prior cycle credits" for affordable housing units constructed between April 1, 1980 and December 15, 1986, which predates the first set of COAH regulations. Monroe has utilized 140 credits in three separate developments to meet the PRO. These units qualify for prior cycle credit on a direct one-to-one basis. All of these 140 credits were deemed creditworthy in the HEFSP certified by COAH in 1995. These include the following affordable housing developments:

- a. **Mimosa Ridge** – (Block 110.101, Lots 3-9, 11-14; Block 110.102, Lots 6 -21; Block 110.103, Lots 17 – 18). This 30-unit low-income family rental project was completed in 1985 by Farmers Home Administration (a.k.a. Rural Development). There are minimum 20-year affordability controls on these units with potentially a longer restrictive time-frame.<sup>11</sup>
- b. **Carino Park Apartments** (Block 11603, Lot 12) – The Carino Park Apartments, owned and operated by the Gloucester County Housing Authority, were completed in November 1984. It consists of 100 units permanently dedicated for very low-income elderly/disabled/handicapped persons.
- c. **Gloucester County Housing Authority Single Family Scattered Sites** (Block 613, Lot 1; Block 1603, Lots 4 and 38; Block 2104, Lot 4; Block 2105, Lot 11; Block 8201, Lot 20; Block 8910, Lot 8; Block 9902, Lot 5; Block 11902, Lot 1; and Block 13502, Lot 10) - The Gloucester County Housing Authority owns and operates 15 scattered site affordable family rental homes in the Township. 10 of these homes were built between 1980 and 1986 and are permanently dedicated to housing for very low-income families.

## 2. Monroe Towne 100% Affordable Housing

Monroe Towne contains three existing 100 percent affordable family rental developments, which were funded through Rural Development in 1988:

- a. **Willow Creek (Monroe Towne East)** (Block 3401, Lot 5) with 38 family rental units
- b. **Monroe Towne I** (Block 1701, Lot 11.01) with 36 family rental units
- c. **Pleasant Acres (Monroe Towne II)** (Block 1701, Lot 11.02) with 36 rental units

As documented in the 2012 Court Master's Mt. Laurel Report, Mr. Berezna of Rural Development confirmed that these units received federal subsidies through long term loans. All units are available to low-income households, and some receive Rural Development rental assistance.<sup>12</sup> These 110 units were deemed creditworthy in the Township's Third Round Judgment of Compliance and Repose.

## 3. Justin Commons (Block 14301, Lot 57)

This is an existing 100 percent affordable family rental development consisting of 132 apartments. MBI Development Co. (Ingerman) developed and administers the affordable units. It was initially occupied in 2011 and consists of 18 units reserved for very-low-income, 48 low-income, and 66 moderate-income units. The Township is applying 62 units and 62 rental bonus credits towards the Prior Round obligation as the units were deemed creditworthy in the Township's Third Round Judgment of Compliance and Repose.

## 4. Oak Street Redevelopment (Block 11701, Lot 45; Block 11902, Lots 6 and 15)

This project includes 4 affordable family for-sale homes developed in 1998 that are credited towards the Prior Round obligation. The project was deemed credit worthy in the Third Round Judgment of Compliance and Repose.

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<sup>11</sup> Mary Beth Lonergan, PP, AICP, Master's Report for Mt. Laurel Fairness Hearing, Monroe Township, Gloucester County, New Jersey, Dec. 14, 2012, page 34.

<sup>12</sup> Ibid, page 34.

## 5. Garden Villas at Amberleigh (Block 110.0407, Lot 87)

This is an existing inclusionary development with 140 condominiums, of which there are 17 deed-restricted affordable for-sale units for families. The Township is applying 17 credits towards the Prior Round obligation as the units were deemed creditworthy in the Township's Third Round Judgment of Compliance and Repose.

## 6. Barclay Glen

There are two interrelated Barclay Glen developments. Barclay Glen (Block,101, Lot 3) is an existing inclusionary development of 204 apartments with 23 affordable family rental units. Barclay Glen North (Block 101, Lot 3.08) is an existing 72-unit inclusionary development with 8 affordable family rental units. Taken together, there are 31 affordable units in Barclay Glen and Barclay Glen North consisting of 16 low-income and 15 moderate-income units. The Township is applying 31 credits towards the Prior Round obligation as the units were deemed creditworthy in the Township's Third Round Judgment of Compliance and Repose.

## 7. Rental Bonus Credits

Pursuant to N.J.A.C. 5:93-5.15(d), the Township may claim 2 units of credit for rental units available to the general public (i.e. family rentals or non-age-restricted group homes) or 1.33 units of credit for age-restricted rentals. Rental bonuses for the Prior Round are capped at the rental obligation, which is 25 percent of the new construction obligation. For the Prior Round, Monroe Township has a rental obligation of 110 units and, therefore, may apply up to 110 bonus credits. Monroe will apply 13 rental bonus credits from Pleasant Acres (Monroe Towne II), and 62 rental bonus credits from Justin Commons, for a total of 75 bonus credits.

## Summary of Prior Round Credits

As shown in the table below, the Township has a total of 364 existing affordable units along with 75 rental bonus credits to meet its Prior Round obligation.

PRIOR ROUND CREDITS						
Project	Credit Type	Status	Available Credits	Prior Round		
				Units	Bonus	Total
Mimosa Ridge	NAR/R	Prior Cycle	30	30		30
Carino Park Apartments	AR/R	Prior Cycle	100	100		100
Gloucester County Scattered Sites	NAR/R	Prior Cycle	10	10		10
Willow Creek (Monroe Towne East)	NAR/R	Existing	38	38		38
Monroe Towne I	NAR/R	Existing	36	36		36
Pleasant Acres (Monroe Towne II)	NAR/R	Existing	36	36	13	49
Oak Street Redevelopment	NAR/R	Existing	4	4		4
Justin Commons	NAR/R	Existing	132	62	62	124
Garden Villas at Amberleigh	NAR/S	Existing	17	17		17
Barclay Glen	NAR/R	Existing	23	23		23
Barclay Glen North	NAR/R	Existing	8	8		8
Total				364	75	439
Obligation				439		
Age-Restricted				100		
Max Bonus				110		
Key: NAR/R – Family Rental    NAR/S - Family Sale    AR/R – Senior Rental    AR/S – Senior Sale						

## Third Round Mechanisms & Credits

### 1. Justin Commons (Block 14301, Lot 57)

This is a 100 percent affordable family rental development consisting of 132 apartments. The Township is applying 70 units and 70 rental bonus credits to the Third Round obligation. The project was deemed credit worthy in the Third Round Judgment of Compliance and Repose.

### 2. Hightop Redevelopment (Block 12503, Lots 16, 17, 18 and 19)

the Township Council adopted Resolution No. R:221-2019 on September 23, 2019, declaring numerous parcels as an Area in Need of Rehabilitation, known as the "Commercial Corridor Rehabilitation Area".

On November 13, 2024, the Township Council adopted Resolution R:296-2024, designating "Hightop Developer" as the Conditional Redeveloper for the Area in Need of Rehabilitation. Resolution R:296-2024 memorializes the agreement between the Township and Conditional Redeveloper under a non-binding Memorandum of Understanding for the development of a mixed-use project, including approximately 30,000 square feet of commercial space and 206 residential units, to be built on approximately 27.26 acres within Block 12503, Lots 16, 17, 18 and 19.

On November 13, 2024, the Township Council also adopted Resolution R:297-2024, requesting and directing the Planning Board to undertake a preliminary investigation to determine whether the tract qualifies as an Area in Need of Redevelopment. The Planning Board is in the process of scheduling a public hearing on the Redevelopment Investigation Report.

The Township is currently negotiating a Redevelopment Plan based on a concept plan with 236 total townhouse units, including 65 age-targeted units, 123 market-rate units, and 48 affordable split townhouse units at a 20 percent set-aside. The concept also includes a 200-foot retail corridor along Tuckahoe Road, including a 5,220 square foot restaurant with drive-thru; a 5,000 square foot retail building; and a 4,620 square foot carwash facility. The developer has issued a letter requesting inclusion in the HEFSP based on the above concept plan and has committed to constructing the project.

The Township is applying 13 of the 48 family for-sale units of credit towards the Third Round obligation.

### 3. Barclay Glen South (Block 101, Lot 2 and 53)

This development received use variance approval (ZBA Resolution #14-33) which permitted up to 336 apartment units. The final site plan approval granted on September 6, 2016 (ZBA Resolution #16040) permitted the construction of 336 apartments with an affordable housing set-aside of 11.1% or 37 affordable units of which a maximum of 12 units may be placed in the Barclay Glen Apartment complex, with the remainder being placed on the Barclay Glen South property. The project was deemed credit worthy in the Third Round Judgment of Compliance and Repose and is currently under construction. The Township is applying 30 units and 30 rental bonus credits towards the Third Round obligation.

#### **4. Acme Shopping Center Redevelopment (Block 11301, Lots 1, 2, 2.01, 2.02, 3, 4, 5 and 6; Block 11301.02, Lots 20-23; and Block 11201, Lot 1).<sup>13</sup>**

In 2005, the Monroe Township Council authorized (Resolution No. R:361-2005) the Planning Board to initiate an investigation of these properties as an Area in Need of Redevelopment (Block 11301, Lots 1, 2, 2.01, 2.02, 3, and 4 and Block 3601, Lots 11-18 and Lots 43-46 inclusive) and prepare a redevelopment plan. The redevelopment area included properties located on both sides of Route 322 on the southeastern edge of the Williamstown Central Business District.

The Planning Board recommended to the Council that the area be declared an Area in Need of Redevelopment and recommended a Redevelopment Plan for adoption. The Township Council adopted Ordinance No. O:15-2006 on May 9, 2006, declaring the study area as an Area in Need of Redevelopment and adopting the Redevelopment Plan. The study area consisted of approximately 110 acres (not including the right-of-way for Route 322). Approximately 25 acres were developed, but not being fully utilized. The Redevelopment Plan envisioned approximately 250 dwelling units (20% affordable set-aside) and 325,000 square feet of retail space, of which 170,000 would replace the existing structures on the south side of Route 322.

The 1<sup>st</sup> Amendment Redevelopment Plan was recommended by the Township Planning Board on October 26, 2006 and adopted by the Township Council on February 13, 2007 (Ordinance No. O:02-2007).

The 2<sup>nd</sup> Amendment Redevelopment Plan was recommended by the Township Planning Board to the Township Council on March 27, 2008 (Resolution No. PB-51-08) and adopted by the Township Council on June 10, 2008 (Ordinance No. O:17-2008). The 2<sup>nd</sup> Amendment expanded the redevelopment area on the south side of Route 322 toward Corkery Lane including Block 11301, Lots 5 and 6, Block 113.0102, Lots 20, 21, 22, and 23, and Block 11201, Lot 1. The expanded study area consisted of approximately 127 acres (not including the Route 322 right-of-way). Approximately 34 acres were developed, but not being fully utilized.

The 2<sup>nd</sup> Amendment Redevelopment Plan is envisioned to have approximately 250 dwelling units and 495,000 square feet of retail space (170,000 of which would replace the existing structures on the south side of Route 322). The plan required 20% of the total residential units as deed-restricted affordable housing. Pinelands Development Credits are required to be purchased and redeemed for 25% of all residential units constructed, excluding affordable units.

In September 2010, a Redevelopment Plan for Block 3601, Lots 11-18 inclusive and Lots 43-46 inclusive, was prepared to separate these lots from the Acme Shopping Center Redevelopment Plan. That area is referred to as the Williamstown Square Redevelopment Area. The Williamstown Square Redevelopment Plan was adopted by the Township Council in October 2010 (Ordinance No. O:20-2010).

The 3<sup>rd</sup> Amendment Acme Shopping Center Redevelopment Plan was prepared in October 2012.<sup>14</sup> The Redevelopment Plan includes only the following properties, located on the southside of Route

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<sup>13</sup> In September 2010, Block 3601, Lots 11-18 inclusive and Lots 43 – 46 inclusive, were removed from the Acme Shopping Center Redevelopment Area creating the Williamstown Square Redevelopment Area Plan.

<sup>14</sup> Acme Shopping Center Redevelopment Plan, 3<sup>rd</sup> Amendment, Prepared by J. Timothy Kernan, PE, PP, CME, October 2012, pages1-8.

322: Block 11301, Lots 1, 2, 2.01, 2.02, 3, 4, 5, and 6, Block 113.0102, Lots 10-23 inclusive, and Block 11201, Lot 1. The study area consists of approximately 51 acres with much not being fully utilized.

Under this 3<sup>rd</sup> Amendment, the Acme Shopping Center Redevelopment Plan provides for multi-tenanted mixed-use retail/commercial uses and single family attached townhouses. The affordable housing requirements provide for 20% of the total residential units as deed-restricted, affordable housing on-site, or at another location within the Township.

The 3<sup>rd</sup> Amendment Acme Shopping Area Redevelopment Plan was not certified by the Pinelands Commission. Therefore the 2<sup>nd</sup> Amendment is the effective Plan which is cited in the Third Round HEFSP for 50 future affordable housing credits. The project was deemed credit worthy in the Third Round Judgment of Compliance and Repose.

## **5. Whitehall Gardens (County Village at Whitehall) (Block 8001, Lot 28)**

This development received approval in 2007 for an age-restricted community of 240 residential units, including 192 market rate units and 48 affordable units. In 2011, the approval was converted to a non-age-restricted community through Planning Board Resolutions 27-11, 29-11, 31-11.<sup>15</sup> On October 11, 2018, the developer then received amended site plan approval to convert the community back to age-restricted housing (Resolution PB-77-18). The project was ultimately constructed with 192 market-rate age restricted lots, including 22 affordable age-restricted for-sale twin home units on-site, which is in place of the optional in-lieu contribution. The project was deemed creditworthy for 22 units in the Third Round Judgment of Compliance and Repose.

## **6. The Mews at St. Mary (a.k.a. Catholic Charities, St. Mary's Redevelopment Plan)**

On December 14, 2020, the Township adopted Ordinance O:29-200 approving the St. Mary's Redevelopment Plan and authorizing affordable housing trust fund expenditures to support a 100% affordable age-restricted housing development. The St. Mary's Redevelopment Plan identified part of the St. Mary Church property to be utilized for this affordable housing project.

On February 22, 2021, the Township Council adopted Resolution R:69-2021 which determined in accordance with New Jersey Housing Mortgage Finance Agency requirements for funding, that there is a need for this proposed development. The development would include 76 senior affordable housing units. The Township is applying 59 credits towards the Third Round obligation.

## **7. Blaze Mill – Market to Affordable Housing Program, (Block14101, Lot 1; Block141.0602, Lot 1.01)**

On July 15, 2013, a Court Order was issued approving the Final Judgement of Compliance and Repose and Order approving the Settlement Agreement between the Township and Blaze Mill Development Group, LLC. The Settlement Agreement provided for 250 apartments on the 61-acre site as part of a mixed-use development including a minimum of 100,000 square feet of non-residential development. The Agreement stipulated that the Developer's affordable housing obligation would be met through the payment of \$6,160 per each market-rate apartment or a total of \$1,540,000. These funds would implement a Market to Affordable Program in the Township. A

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<sup>15</sup> Mary Beth Lonergan, Master's Report on the Compliance Efforts and Settlement Agreement between Blaze Mill and Monroe Township, Gloucester County, December 14, 2012, page 36.

total of 56 affordable apartments are stipulated, which would result in an off-site housing set-aside of 22.4%.

On March 26, 2018, the Township Council approved by resolution, the Market to Affordable Programs Guidelines for both low- and moderate-income units. The Market-To-Affordable Program seeks to alleviate some of the effects of home foreclosure and abandonment or neglect of properties in the Township while at the same time addressing a portion of its Gap Period obligation. The program is intended to create a total of 56 affordable for-sale and rental units, deed restrict them and re-sell or rent them to qualified buyers and/or tenants. All housing units will be brought up to code prior to resale or rental.

The Township has executed a contract with Triad Associates to implement the *Market to Affordable Program in accordance with Uniform Housing Affordability Rules*, dated March 2018. In accordance with the Third Round Judgement of Repose and Compliance, the Township is able to claim 56 credits towards the Third Round obligation.

## 8. Rental Bonus Credits

Rental bonuses for the Third Round are capped at the rental obligation, which is 25 percent of the new construction obligation. For the Third Round, Monroe Township has a rental obligation of 100 units and, therefore, may apply up to 100 bonus credits. Monroe has applied 70 rental bonus credits from the Justin Commons and 30 rental bonus credits from Barclay Glen South towards the Third Round obligation.

## Summary of Third Round Credits

As shown in the table below, the Township has a total of 300 existing or proposed affordable units to address the Third Round obligation. Accounting for the 100 rental bonus credits, the affordable housing credits total 4000 units. Therefore, the Township has met its Third Round Obligation.

THIRD ROUND CREDITS							
Project	Credit Type	Status	Total Units	Available Credits	Third Round		
					Units	Bonus	Total
Justin Commons	NAR/R	Existing	132	132	70	70	140
Hightop Development	NAR/S	AINR	236	48	13		13
Barclay Glen South	NAR/R	Under Const.	336	37	30	30	60
Acme Shopping Center Redevelopment Plan	NAR/R	AINR	250	50	50		50
Whitehall Gardens (a.k.a. County Village at Whitehall)	AR/S	Existing	192	22	22		22
The Mews at St. Mary (a.k.a. Catholic Charities, St. Mary’s Redevelopment Plan)	AR/R	Under Const.	75	75	59		59
Blaze Mill (Market to Affordable)	NAR/R or S	Under Const.	56	56	56		56
Total					300	100	400
Obligation					400		
Age-Restricted					81		
Max Bonus					100		
Key: NAR/R – Family Rental    NAR/S - Family Sale    AR/R – Senior Rental    AR/S – Senior Sale							

## Fourth Round Mechanisms & Credits

### 1. Hightop Redevelopment (Block 12503, Lots 16, 17, 18 and 19)

The Township is applying 35 of the 48 family for-sale units of credit towards the Fourth Round obligation.

### 2. Route 322 Associates, LLC /Scotland Run Center (Block 15001, Lots 5 & 5.01)

A Use Variance and Preliminary Major Subdivision and Site Plan approval was granted for a mixed-use development located at Route 322 and Fries Mill Road. Proposal includes 79 residential lots including 16 affordable for-sale units. This development is still in an on-going planning process. It is tied to planned intersection improvement at Route 322 and Fries Mill Road, which has been under design review by the NJDOT. The Township is currently considering the property for designation as an Area in Need of Redevelopment with a concept to construct 135 age-restricted rental units with 27 affordable units at a 20 percent set-aside. The Township is applying 27 age-restricted rental units with 13 rental bonus credits towards the Fourth Round obligation.

### 3. Barclay Glen South (Block 101, Lot 2 and 53)

The Township is applying 7 units and 3 rental bonus credits towards the Third Round obligation.

### 4. The Mews at St. Mary (a.k.a. Catholic Charities, St. Mary's Redevelopment Plan)

The Township is applying 16 units and 8 bonus credits towards the Fourth Round obligation.

### 5. Williamstown Square Redevelopment Plan Area (Block 3601, Lots 11, 12, 13, 15, 16, 17, 18, 43, 44, 45, 46)

On October 28, 2020, the Williamstown Square Redevelopment Plan, Amendment #2 was adopted by the Township (Ordinance O:27-2020). The Redevelopment Plan requires a minimum of 425 residential units and permits up to 595 total units, with a mandatory 20 percent set-aside for affordable housing. The Township anticipates 595 units would be constructed, including 78 affordable rental units. The Township is therefore applying 78 units and 39 rental bonus credits towards the Fourth Round obligation.

### 6. Pine Estates (Block 14001, Lot 5)

This property located at 1267 Glassboro Road received use variance approval from the Zoning Board of Adjustment to construct 73 non-age-restricted for-sale townhome units, including 15 affordable units at 20 percent set-aside as per the ordinance requirements. The tract is 19.6 acres situated in the Residential Age-Restricted District, which necessitates a use variance to permit non-age-restricted housing. The Township is applying 11 credits towards the Fourth Round obligation.

### 7. Cross Keys (Block 101, Lots 8, 11-13, 17, and 39)

This project is proposed to construct 322 attached townhouse units, including 66 affordable units. The developer has issued a letter requesting inclusion in the HEFSP based on the above concept plan and has committed to constructing the project. The Township is applying 66 credits towards the Fourth Round obligation.

## 8. Rental Bonus Credits

Rental bonuses for the Fourth Round are capped at the rental obligation, which is 25 percent of the new construction obligation. For the Fourth Round, Monroe has a rental obligation of 76 units and, therefore, may apply up to 76 bonus credits. Rental bonus credits for the Fourth Round are 1.5 credits per rental unit. Monroe will apply 13 rental bonus credits from Route 322 Associates, 3 from Barclay Glen South, 8 from the Mews and St. Mary, and 39 from Williamstown Square Redevelopment, for a total of 63 bonus credits.

### Summary of Fourth Round Credits

As shown in the table below, the Township has total of 240 existing or proposed affordable units and 63 rental bonus credits to address the Fourth Round obligation.

FOURTH ROUND CREDITS							
Project	Credit Type	Status	Total Units	Available Credits	Fourth Round		
					Units	Bonus	Total
Hightop Development	NAR/S	AINR	236	48	35		35
Route 322 Associates	AR/R	Proposed	135	27	27	13	40
Barclay Glen South	NAR/R	Under Const.	336	37	7	3	10
The Mews at St. Mary (a.k.a. Catholic Charities, St. Mary’s Redevelopment Plan)	AR/R	Under Const.	75	75	16	8	24
Williamstown Square Redevelopment Plan	NAR/R	AINR	595	78	78	39	117
Pine Estates	NAR/S	Use Variance	73	11	11		11
Cross Keys	NAR/S	Proposed	322	66	66		66
Total					240	63	303
Obligation					303		
Age-Restricted					43		
Max Bonus					76		
Key: NAR/R – Family Rental    NAR/S - Family Sale    AR/R – Senior Rental    AR/S – Senior Sale							

## Summary of Mechanisms & Credits

CREDITS														
Project	Credit Type	Status	Total Units	Available Credits	Prior Round			Third Round			Fourth Round			Excess
					Units	Bonus	Total	Units	Bonus	Total	Units	Bonus	Total	
Mimosa Ridge	NAR/R	Prior Cycle	30	30	30		30			0			0	0
Carino Park Apartments	AR/R	Prior Cycle	100	100	100		100			0			0	0
Gloucester County Scattered Sites	NAR/R	Prior Cycle	15	10	10		10			0			0	0
Willow Creek (Monroe Towne East)	NAR/R	Existing	38	38	38		38			0			0	0
Monroe Towne I	NAR/R	Existing	36	36	36		36			0			0	0
Pleasant Acres (Monroe Towne II)	NAR/R	Existing	36	36	36	13	49			0			0	0
Oak Street Redevelopment	NAR/R	Existing	4	4	4		4			0			0	0
Justin Commons	NAR/R	Existing	132	132	62	62	124	70	70	140			0	0
Garden Villas at Amberleigh	NAR/S	Existing	140	17	17		17			0			0	0
Barclay Glen	NAR/R	Existing	204	23	23		23			0			0	0
Barclay Glen North	NAR/R	Existing	72	8	8		8			0			0	0
Hightop Development	NAR/S	AINR	236	48			0	13		13	35		35	0
Route 322 Associates	AR/R	Proposed	135	27			0			0	27	13	40	0
Barclay Glen South	NAR/R	Under Const.	336	37			0	30	30	60	7	3	10	0
Acme Shopping Center Redevelopment Plan	NAR/R	AINR	250	50			0	50		50			0	0
Whitehall Gardens (a.k.a. County Village at Whitehall)	AR/S	Existing	192	22			0	22		22			0	0
The Mews at St. Mary (a.k.a. Catholic Charities, St. Mary's Redevelopment Plan)	AR/R	Under Const.	75	75			0	59		59	16	8	24	0
Blaze Mill (Market to Affordable)	NAR/R or S	Under Const.	56	56			0	56		56			0	0
Williamstown Square Redevelopment Plan	NAR/R	AINR	595	78			0			0	78	39	117	0
Pine Estates	NAR/S	Use Variance	73	11			0			0	11		11	0
Cross Keys	NAR/S	Proposed	322	66			0			0	66		66	0
			Total		364	75	439	300	100	400	240	63	303	0
			Obligation		439			400			303			
			Age-Restricted		100			81			43			
			Max Bonus		110			100			76			
Key: NAR/R – Family Rental    NAR/S - Family Sale    AR/R – Senior Rental    AR/S – Senior Sale														

## XII. Appendix

**FLORIO PERRUCCI STEINHARDT CAPPELLI & TIPTON, LLC**

Sandra A. Graise, Esquire

Attorney ID No. 382012021

1010 Kings Highway South, Bldg. 1, 2<sup>nd</sup> Floor

Cherry Hill, New Jersey 08034

(856) 853-5530 – Phone

(856) 354-8318 – Fax

Email: sgraise@floriolaw.com

*Attorneys for Declaratory Plaintiff, Township of Monroe*

<p>TOWNSHIP OF MONROE</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DEPARTMENT OF COMMUNITY AFFAIRS</p> <p style="text-align: center;">Defendant.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION – GLOUCESTER COUNTY</p> <p>DOCKET NO.: _____</p> <p>CIVIL ACTION</p> <p><b>COMPLAINT FOR DECLARATORY JUDGMENT</b></p>
--	--

Plaintiff, Township of Monroe, located in the County of Gloucester and State of New Jersey, by way of Complaint for Declaratory Judgment, alleges as follows:

**INTRODUCTION**

1. This is an action for declaratory judgment brought pursuant to Rule 4:42-3 of the New Jersey Rules of Court, seeking a certification of compliance with the Fair Housing Act (“FHA”), N.J.S.A. 52:27D-301 et seq.

2. The Township of Monroe (“Plaintiff” or “Township”) brings this action in accordance with Directive #14-24 issued by the Acting Administrative Director of the Courts on December 13, 2024, which requires municipalities seeking FHA compliance certification to file an action in the form of a declaratory judgment complaint.

**THE PARTIES**

3. Plaintiff, Township of Monroe, is a duly organized municipal corporation located in Gloucester County, New Jersey.

4. Defendant, State of New Jersey, Department of Community Affairs (“DCA”), is a state agency responsible for providing non-binding estimates of municipal fair share obligations under the FHA, as amended.

### **JURISDICTION**

5. This Court has jurisdiction over this matter pursuant to N.J.S.A. 2A:16-50, as Plaintiff seeks a declaratory judgment to clarify its rights and obligations under the FHA, as amended.

### **BACKGROUND**

6. On March 20, 2024, Governor Murphy signed into law an amendment to the FHA (“Amended FHA”), which requires the DCA to produce non-binding estimates of municipal fair share obligations on or before October 20, 2024.

7. On October 18, 2024, the DCA issued its report (“DCA Report”) estimating the Township of Monroe’s Round 4 affordable housing obligations for the period of 2025-2035 as follows: a. Present Need (Rehabilitation Obligation): 50 units. b. Prospective Need (New Construction Obligation): 303 units.

8. The Amended FHA allows municipalities to demonstrate that their fair share obligations should be lower than the DCA’s non-binding estimates, based on applicable standards.

9. The Township of Monroe accepts the DCA’s calculations subject to its right to seek vacant land and/or durational adjustments in its Housing Plan Element and Fair Share Plan in accordance with the Amended FHA.

10. On January 22, 2025, the Township Council of the Township of Monroe adopted Resolution R:47-2025, committing to the DCA’s Round 4 obligations of 50 units of Present Need and 303 units of Prospective Need, subject to the reservations set forth therein. A copy of Resolution R:47-2025 is attached hereto as Exhibit A.

11. Pursuant to Directive #14-24, the Township is required to file a declaratory judgment action within 48 hours of the adoption of its resolution, or by February 3, 2025, whichever is sooner.

12. The Township seeks a judgment from this Court declaring that it is in compliance with the FHA, as amended, based on the adoption of Resolution R:47-2025 and its commitment to meeting its Round 4 obligations.

**FIRST COUNT**  
**(Approval of Present Need and Prospective Need Numbers)**

13. Plaintiff repeats and incorporates by reference each of the allegations set forth above as if fully set forth herein.

14. Plaintiff has adopted Resolution R:47-2025 in compliance with the requirements of the Amended FHA and Directive #14-24.

15. Plaintiff has committed to addressing its Round 4 affordable housing obligations as calculated in the DCA Report, subject to any applicable adjustments allowed under the FHA and relevant regulations.

16. Plaintiff has taken steps to ensure compliance with its affordable housing obligations, including preparing a Housing Plan Element and Fair Share Plan in accordance with the FHA and regulations promulgated by the Council on Affordable Housing (“COAH”).

17. The DCA Report provides non-binding estimates of affordable housing obligations, and Plaintiff reserves the right to seek adjustments, including but not limited to vacant land and durational adjustments, as part of its compliance efforts.

18. Plaintiff acknowledges that compliance with the FHA also involves adherence to applicable timelines and implementation of zoning and planning measures necessary to facilitate affordable housing development.

19. A declaratory judgment is necessary to clarify Plaintiff’s rights and obligations under the FHA, as amended, and to provide certainty regarding the Township’s compliance status.

**SECOND COUNT**  
**(Approval of Housing Plan Element and Fair Share Plan Element)**

20. The Plaintiff repeats and incorporates by reference each of the allegations set forth in the previous paragraphs of this Complaint as if fully set forth herein.

21. Pursuant to the Act, a Housing Plan Element and Fair Share Plan (“HPFSP”) must be prepared and adopted by the Planning Board by June 30, 2025.

22. The Plaintiff commits to prepare the appropriate HPFSP to address the Township’s fair share affordable housing obligations, as determined by the Program and the Court, which HPFSP shall apply as appropriate any applicable adjustments, including but not limited to: a. A Vacant Land Adjustment predicated upon a lack of vacant, developable, and suitable land; b. A Durational Adjustment (whether predicated upon lack of sanitary sewer or lack of water); c. An adjustment predicated upon regional planning entity formulas, inputs, or considerations, as applicable; d. An adjustment based on any future legislation that may be adopted that allows an adjustment of the affordable housing obligations; e. An adjustment based upon any ruling in litigation involving affordable housing obligations; and f. Any other applicable adjustment permitted in accordance with the Act and/or applicable regulations.

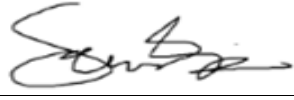
23. Upon the Planning Board’s adoption of the HPFSP, the Plaintiff will file it with the Court and submit it to the Program prior to June 30, 2025, and will seek approval of the HPFSP and the issuance of the relief set forth below.

**WHEREFORE**, the Plaintiff seeks a declaratory judgment for the following relief:

- a. Declaring that the Plaintiff has established jurisdiction with the Program and with the Court so as to confirm its present and prospective fair share affordable housing obligations as set forth in the resolution attached hereto as Exhibit A;
- b. Declaring the present and prospective fair share affordable housing obligations of the Plaintiff under the Act;
- c. Declaring the approval of the Plaintiff’s HPFSP, which is subsequently adopted by the Planning Board, endorsed by the Township Council, and filed with the Court and submitted to the Program, including, as appropriate and applicable, any and/or all of the adjustments referenced above;
- d. Declaring that the Plaintiff continues to have immunity from all exclusionary zoning litigation and all litigation related to its affordable housing obligations;
- e. Declaring that the Plaintiff is constitutionally compliant and issuing a compliance certification or judgment of compliance and repose or such other protections as afforded to it in complying with the requirements of the Act, including but not limited to all immunities and presumptions of validity necessary to satisfy its affordable fair share housing obligations voluntarily without having to endure the expense and burdens of unnecessary third-party litigation for the Fourth Round (beginning July 1, 2025, and ending June 30, 2035);

- f. Declaring such other relief that the Program and/or Court deems just and proper within the parameters of the Act and applicable regulations.

**FLORIO PERRUCCI STEINHARDT  
CAPPELLI & TIPTON, LLC**

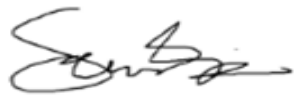
By:   
Sandra A. Graise, Esquire  
Attorney for Plaintiff

Dated: January 24, 2025

**CERTIFICATIONS PURSUANT TO RULE 4:5-1(b)(2) AND -1(b)(3)**

In accordance with R. 4:5-1(b)(2), I certify that the matter in controversy is not currently the subject of any other court action or arbitration proceeding now pending or contemplated. I certify that at this time I do not contemplate filing any other court action or any arbitration proceeding. I certify that at this time no additional parties should be joined in the action. In accordance with R. 4:5-1(b)(2) and -1(b)(3), I certify that confidential personal identifiers have been redacted from documents now submitted to the Court and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b). I certify that all of the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**FLORIO PERRUCCI STEINHARDT  
CAPPELLI & TIPTON, LLC**

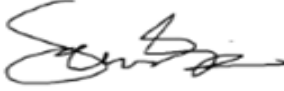
By:   
Sandra A. Graise, Esquire  
Attorney for Plaintiff

Dated: January 24, 2025

**DESIGNATION OF TRIAL COUNSEL PURSUANT TO R. 4:5-1(c) AND R. 4:25-4**

In accordance with R. 4:5-1(c) and R. 4:25-4, Sandra Graise, Esq., of Florio Perrucci Steinhardt Cappelli and Tipton, is hereby designated as trial counsel for Plaintiff Township of Monroe in this matter.

**FLORIO PERRUCCI STEINHARDT  
CAPPELLI & TIPTON, LLC**

By:   
Sandra A. Graise, Esquire  
Attorney for Plaintiff

Dated: January 24, 2025

# EXHIBIT A

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS**

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

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

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

**WHEREAS**, the DCA Report calculates the Township of Monroe's Round 4 (2025-2035) obligations as follows: a Present Need or Rehabilitation Obligation of 50 units and a Prospective Need or New Construction Obligation of 303 units; and

**WHEREAS**, the Amended FHA provides that the DCA Report is non-binding, thereby inviting municipalities to demonstrate that the Amended FHA would support lower calculations of Round 4 affordable housing obligations; and

**WHEREAS**, the Amended FHA further provides that "[a]ll parties shall be entitled to rely upon regulations on municipal credits, adjustments, and compliance mechanisms adopted by COAH unless those regulations are contradicted by statute, including P.L. 2024, c.2, or binding court decisions" (N.J.S.A. 52:27D-311(m)); and

**WHEREAS**, COAH regulations authorize vacant land adjustments as well as durational adjustments; and

**WHEREAS**, based on the foregoing, the Township of Monroe accepts the DCA calculations of the Township of Monroe's fair share obligations and commits to its fair share of 50 units of Present Need and 303 units of Prospective Need, subject to any vacant land and/or durational adjustments it may seek as part of the Housing Plan element and Fair Share Plan element it subsequently submits in accordance with the Amended FHA; and

**WHEREAS**, the Township of Monroe reserves the right to comply with any additional amendments to the FHA that the Legislature may enact; and

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

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

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

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS**

**WHEREAS**, in addition to the above, the Acting Administrative Director issued Directive #14-24, dated December 13, 2024, and made the directive available later in the week that followed; and

**WHEREAS**, pursuant to Directive #14-24, a municipality seeking a certification of compliance with the FHA shall file an action in the form of a declaratory judgment complaint in the county in which the municipality is located within 48 hours after adoption of the municipal resolution of fair share obligations, or by February 3, 2025, whichever is sooner; and

**WHEREAS**, the Township of Monroe seeks a certification of compliance with the FHA and, therefore, directs its attorney, Sandra Graise, Esq., of Florio Perrucci Steinhardt Cappelli and Tipton, to file a declaratory relief action within 48 hours of the adoption of this resolution in Gloucester County.

**NOW, THEREFORE, BE IT RESOLVED** on this 22<sup>nd</sup> day of January, 2025 by the Township Council of the Township of Monroe as follows:


1. All of the above Whereas Clauses are incorporated into the operative clauses of this resolution.
2. The Township of Monroe hereby commits to the DCA Round 4 Present Need Obligation of 50 units and the Round 4 Prospective Need Obligation of 303 units described in this resolution, subject to all reservations of rights set forth above.
3. The Township of Monroe hereby directs its attorney, Sandra Graise, Esq., to file a declaratory judgment complaint in Gloucester County within 48 hours after adoption of this resolution, attaching this resolution.
4. The Township of Monroe authorizes its attorney to attach this resolution as an exhibit to the declaratory judgment action that is filed and to submit and/or file this resolution with the Program or any other such entity as may be determined to be appropriate.
5. This resolution shall take effect immediately, according to law.

**ADOPTED** at a meeting of the Township Council of the Township of Monroe on January 22, 2025.

**TOWNSHIP OF MONROE**

  
**CNCL. PRES. DONALD HEVERLY**

**ATTEST:**

  
**Twp. Clerk, Aileen Chiselko, RMC**  
**or Deputy Clerk, Jennifer Harbison, RMC**

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE  
HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS****CERTIFICATION OF CLERK**

The foregoing Resolution was duly adopted at a meeting of the Township Council of the Township of Monroe, County of Gloucester, State of New Jersey, held on the 22<sup>nd</sup> day of January 2025 in the Municipal Complex located at 125 Virginia Avenue, Williamstown, New Jersey.

*Aileen Chiselko*  
**Twp. Clerk, Aileen Chiselko, RMC**  
**or Deputy Clerk, Jennifer Harbison, RMC**

**ROLL CALL VOTE**

	<b>AYES</b>	<b>NAYS</b>	<b>ABSTAIN</b>	<b>ABSENT</b>
<b>Cncl. Adams</b>	✓			
<b>Cncl. Cope</b>	✓			
<b>Cncl. Fox</b>	✓			
<b>Cncl. O'Reilly</b>	✓			
<b>Cncl. Rossi</b>	✓			
<b>Cncl. Valentine</b>				✓
<b>Cncl. Pres. Heverly</b>	✓			
<b>Tally:</b>	6			1

**FILED**

**April 21, 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 MONROE, 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-115-25

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 24, 2025 (“DJ Complaint”) by the Petitioner, TOWNSHIP of MONROE (“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 50 affordable units, and its “**prospective need**” obligation of the Petitioner has been calculated and reported as 303 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 ~~21st~~<sup>April</sup> day of ~~MARCH~~<sup>APRIL</sup> 2025 **ORDERED AND ADJUDGED** as follows:

1. That the “present need” obligation of the Municipality, be, and hereby is fixed as 50 affordable units for the Fourth Round housing cycle.

---

<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 303 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. # GLO-L-115-25 ~~L-25~~ ~~XXXX~~ 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.


**RESOLUTION R:31-2025****RESOLUTION APPOINTING A MUNICIPAL HOUSING LIAISON FOR THE  
ADMINISTRATION OF THE COUNCIL ON AFFORDABLE HOUSING (COAH)  
PROGRAM FOR THE TOWNSHIP OF MONROE**

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

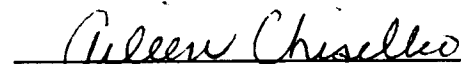
**WHEREAS**, the Township of Monroe has established Chapter 49 entitled, "Housing Liaison, Municipal" to provide for the appointment of a Municipal Housing Liaison to administer the Township of Monroe's affordable housing program.

**NOW, THEREFORE, BE IT RESOLVED**, by the Township Council of the Township of Monroe, in the County of Gloucester, and the State of New Jersey, that the Business Administrator, James V. DeHart, III, is hereby appointed by the Township Council of the Township of Monroe as the Municipal Housing Liaison for the administration of the affordable housing program, pursuant to and in accordance with Chapter 49, entitled "Housing Liaison, Municipal" of the Code of the Township of Monroe.

**ADOPTED** at a meeting of the Township Council of the Township of Monroe on January 6, 2025.

**TOWNSHIP OF MONROE**  
**COUNCIL PRESIDENT****ATTEST:**  
**Tw. Clerk, Aileen Chiselko, RMC  
or Deputy Clerk, Jennifer Harbison, RMC****CERTIFICATION OF CLERK**

The foregoing Resolution was duly adopted at a meeting of the Township Council of the Township of Monroe, County of Gloucester, State of New Jersey, held on the 6<sup>th</sup> day of January 2025 in the Municipal Complex located at 125 Virginia Avenue, Williamstown, New Jersey.

  
**Tw. Clerk, Aileen Chiselko, RMC  
or Deputy Clerk, Jennifer Harbison, RMC**

**RESOLUTION R:31-2025****RESOLUTION APPOINTING A MUNICIPAL HOUSING LIAISON FOR THE  
ADMINISTRATION OF THE COUNCIL ON AFFORDABLE HOUSING (COAH)  
PROGRAM FOR THE TOWNSHIP OF MONROE****ROLL CALL VOTE**

	<b>AYES</b>	<b>NAYS</b>	<b>ABSTAIN</b>	<b>ABSENT</b>
<b>Cncl. Adams</b>	✓			
<b>Cncl. Cope</b>	✓			
<b>Cncl. Fox</b>	✓			
<b>Cncl. Heverly</b>	✓			
<b>Cncl. O'Reilly</b>	✓			
<b>Cncl. Rossi</b>	✓			
<b>Cncl. Valentine</b>	✓			
<b>Tally:</b>	7			

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS**

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

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

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

**WHEREAS**, the DCA Report calculates the Township of Monroe's Round 4 (2025-2035) obligations as follows: a Present Need or Rehabilitation Obligation of 50 units and a Prospective Need or New Construction Obligation of 303 units; and

**WHEREAS**, the Amended FHA provides that the DCA Report is non-binding, thereby inviting municipalities to demonstrate that the Amended FHA would support lower calculations of Round 4 affordable housing obligations; and

**WHEREAS**, the Amended FHA further provides that "[a]ll parties shall be entitled to rely upon regulations on municipal credits, adjustments, and compliance mechanisms adopted by COAH unless those regulations are contradicted by statute, including P.L. 2024, c.2, or binding court decisions" (N.J.S.A. 52:27D-311(m)); and

**WHEREAS**, COAH regulations authorize vacant land adjustments as well as durational adjustments; and

**WHEREAS**, based on the foregoing, the Township of Monroe accepts the DCA calculations of the Township of Monroe's fair share obligations and commits to its fair share of 50 units of Present Need and 303 units of Prospective Need, subject to any vacant land and/or durational adjustments it may seek as part of the Housing Plan element and Fair Share Plan element it subsequently submits in accordance with the Amended FHA; and

**WHEREAS**, the Township of Monroe reserves the right to comply with any additional amendments to the FHA that the Legislature may enact; and

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

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

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

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS**

**WHEREAS**, in addition to the above, the Acting Administrative Director issued Directive #14-24, dated December 13, 2024, and made the directive available later in the week that followed; and

**WHEREAS**, pursuant to Directive #14-24, a municipality seeking a certification of compliance with the FHA shall file an action in the form of a declaratory judgment complaint in the county in which the municipality is located within 48 hours after adoption of the municipal resolution of fair share obligations, or by February 3, 2025, whichever is sooner; and

**WHEREAS**, the Township of Monroe seeks a certification of compliance with the FHA and, therefore, directs its attorney, Sandra Graise, Esq., of Florio Perrucci Steinhart Cappelli and Tipton, to file a declaratory relief action within 48 hours of the adoption of this resolution in Gloucester County.

**NOW, THEREFORE, BE IT RESOLVED** on this 22<sup>nd</sup> day of January, 2025 by the Township Council of the Township of Monroe as follows:


1. All of the above Whereas Clauses are incorporated into the operative clauses of this resolution.
2. The Township of Monroe hereby commits to the DCA Round 4 Present Need Obligation of 50 units and the Round 4 Prospective Need Obligation of 303 units described in this resolution, subject to all reservations of rights set forth above.
3. The Township of Monroe hereby directs its attorney, Sandra Graise, Esq., to file a declaratory judgment complaint in Gloucester County within 48 hours after adoption of this resolution, attaching this resolution.
4. The Township of Monroe authorizes its attorney to attach this resolution as an exhibit to the declaratory judgment action that is filed and to submit and/or file this resolution with the Program or any other such entity as may be determined to be appropriate.
5. This resolution shall take effect immediately, according to law.

**ADOPTED** at a meeting of the Township Council of the Township of Monroe on January 22, 2025.

**TOWNSHIP OF MONROE**


  
**CNCL. PRES. DONALD HEVERLY**

**ATTEST:**

  
**Twp. Clerk, Aileen Chiselko, RMC**  
**or Deputy Clerk, Jennifer Harbison, RMC**

**RESOLUTION R:47-2025****RESOLUTION COMMITTING TO DCA'S FOURTH ROUND AFFORDABLE  
HOUSING PRESENT NEED AND PROSPECTIVE NEED NUMBERS****CERTIFICATION OF CLERK**

The foregoing Resolution was duly adopted at a meeting of the Township Council of the Township of Monroe, County of Gloucester, State of New Jersey, held on the 22<sup>nd</sup> day of January 2025 in the Municipal Complex located at 125 Virginia Avenue, Williamstown, New Jersey.

  
**Twp. Clerk, Aileen Chiselko, RMC**  
**or Deputy Clerk, Jennifer Harbison, RMC**

**ROLL CALL VOTE**

	<b>AYES</b>	<b>NAYS</b>	<b>ABSTAIN</b>	<b>ABSENT</b>
Cncl. Adams	✓			
Cncl. Cope	✓			
Cncl. Fox	✓			
Cncl. O'Reilly	✓			
Cncl. Rossi	✓			
Cncl. Valentine				✓
Cncl. Pres. Heverly	✓			
Tally:	6			1

**RESOLUTION R:70-2025**

**RESOLUTION AUTHORIZING THE TOWNSHIP OF MONROE TO  
ENTER INTO A CONTRACT WITH TRIAD ADVISORY SERVICES, INC. FOR  
AFFORDABLE HOUSING ADMINISTRATIVE AGENT SERVICES FOR  
THE TOWNSHIP OF MONROE, COUNTY OF GLOUCESTER,  
STATE OF NEW JERSEY FOR THE YEAR 2025**

**WHEREAS**, a need exists for services of an Affordable Housing Administrative Agent in the Township of Monroe, County of Gloucester, State of New Jersey for the year 2025; and

**WHEREAS**, the Local Public Contracts Law N.J.S.A. 40A:11, et seq. requires that the resolution authorizing the award of contracts for "Professional Services" without competitive bids and the contract itself must be available for public inspection; and

**WHEREAS**, this contract is awarded in accordance with the Fair and Open procedures as established in the "Pay to Play" Law N.J.S.A. 19:44A-20.5 et seq.; and

**WHEREAS**, the Township Council of the Township of Monroe hereby authorizes the Township of Monroe to enter into a Contract for services as set forth in the Contract.

**WHEREAS**, the Mayor of the Township of Monroe has submitted the appointment of **TRIAD ADVISORY SERVICES** to provide Administrative Agent Services in connection with affordable housing rules and regulations, said contract attached hereto and made a part hereof, same being submitted to the Township of Monroe to enter into such agreement; and

**NOW, THEREFORE, BE IT RESOLVED** by the Township Council of the Township of Monroe, County of Gloucester and State of New Jersey that:


1. The Mayor is hereby authorized to sign a contract with **TRIAD ADVISORY SERVICES, INC.**, 1301 W. Forest Grove Road, Vineland NJ 08360, on behalf of the Township of Monroe.
2. The contract period shall be from January 1, 2025 to December 31, 2025 at a cost permissible under the affordable housing regulations.
3. The CFO has certified that funds are to be available in budget account #T-03-56-189-000-001.
4. Notice of the contract shall be published in one of the official newspapers for the Township of Monroe.

**ADOPTED** at a meeting of the Township Council of the Township of Monroe on January 22, 2025.

**TOWNSHIP OF MONROE**

  
CNCL. PRES. DONALD HEVERLY

**ATTEST:**


  
Twp. Clerk, Aileen Chiselko, RMC  
or Deputy Clerk, Jennifer Harbison, RMC

**RESOLUTION R:70-2025**

**RESOLUTION AUTHORIZING THE TOWNSHIP OF MONROE TO  
ENTER INTO A CONTRACT WITH TRIAD ADVISORY SERVICES, INC. FOR  
AFFORDABLE HOUSING ADMINISTRATIVE AGENT SERVICES FOR  
THE TOWNSHIP OF MONROE, COUNTY OF GLOUCESTER,  
STATE OF NEW JERSEY FOR THE YEAR 2025**

**CERTIFICATION OF CLERK**

The foregoing Resolution was duly adopted at a meeting of the Township Council of the Township of Monroe, County of Gloucester, State of New Jersey, held on the 22<sup>nd</sup> day of January 2025 in the Municipal Complex located at 125 Virginia Avenue, Williamstown, New Jersey.

  
\_\_\_\_\_  
Twp. Clerk, Aileen Chiselko, RMC  
or Deputy Clerk, Jennifer Harbison, RMC

**ROLL CALL VOTE**

	AYES	NAYS	ABSTAIN	ABSENT
Cncl. Adams	✓			
Cncl. Cope	✓			
Cncl. Fox	✓			
Cncl. O'Reilly	✓			
Cncl. Rossi	✓			
Cncl. Valentine				✓
Cncl. Pres. Heverly	✓			
Tally:	6			1