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A wide-angle photograph of a two-story residential complex with light-colored siding and dark roofs. The building has multiple units with small porches. In front of the building is a paved parking lot with several cars parked. A black dumpster is visible on the left side of the parking lot. A paved walkway curves along the right side of the parking lot. The background shows a line of green trees under a clear blue sky.

# Fourth Round Housing Element & Fair Share Plan

Township of White

May 30, 2025

Prepared for:

Township of White  
Warren County, New Jersey

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# Fourth Round Housing Element & Fair Share Plan

## Township of White

Warren County, New Jersey

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

Endorsed by the Township Committee: \_\_\_\_\_



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

WHL0012

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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 report is the Township of White's Housing Element and Fair Share Plan ("HEFSP") for the period between 2025 and 2035 (known as the Fourth Round). White 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. Rehabilitation Obligation
2. Prior (First and Second Round) Obligations (1987-1999)
3. Third Round Obligation (1999-2025)
4. Fourth Round 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 A.2d 713, 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. This landmark decision is commonly referred to as "Mount Laurel I" or the "Mount Laurel Doctrine". The 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 another monumental decision in *Southern Burlington County NAACP v. Mt. Laurel*, 92 N.J. 158 (1983) 456 A.2d 390, 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> NJAC 5:91 (Procedural) and NJAC 5:93 (Substantive) Rules. They can be found at: [New Jersey Department of Community Affairs | Second Round Regulations](#)

<sup>2</sup>NJAC 5:96 (Procedural) and NJAC 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.

### ***White Township's Prior Round Compliance***

White Township petitioned COAH for second round substantive certification on January 23, 1995. On June 7, 1995, White Township received second round substantive certification from COAH.

On December 10, 2004, COAH granted a motion requesting extended substantive certification for White Township through December 20, 2005, which was subsequently extended by COAH to December 31, 2008 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, 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 provides 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 ruled 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 Housing Element and Fair Share Reports, and most municipalities concluded the process with a judgment of repose and compliance ("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.

### ***White Township's Third Round Compliance***

On December 12, 2005, White Township petitioned COAH for third round substantive certification pursuant to N.J.A.C. 5:94. COAH granted third round substantive certification on January 10, 2007.

Pursuant to the March 10, 2015 Supreme Court Order, White Township filed a motion with the court on July 7, 2015 seeking a Declaratory Judgment that the municipality has fulfilled its constitutional obligation to provide affordable housing.

On December 8, 2016, White Township entered into a Settlement Agreement with the Fair Share Housing Center to memorialize the terms of settlement of the Township's affordable housing obligations. The Settlement Agreement outlined White Township's affordable housing obligations as follows:

- Rehabilitation Share: 23 units
- Prior Round Obligation: 16 units
- Third Round Prospective Need: 0 units



On March 9, 2017, a Fairness Hearing was held and the Honorable Judge Miller found the Settlement Agreement to be fair and deemed it to be preliminarily in compliance with the Township's affordable housing fair share obligation. The Township adopted a Housing Element & Fair Share Plan on July 11, 2017 to address the affordable housing obligations. The Township has not yet had a Final Compliance Hearing and, therefore, no Final Order of Judgment of Compliance and Repose ("JOR") has been issued of the Third Round.

#### **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 A4, 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 FHA") 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 White Township's present need obligation as 100 units and its Fourth Round prospective need obligation as 322 units. Municipalities were required to adopt a binding resolution outlining their present and prospective fair share obligations by January 31, 2025. On January 30, 2025, the Township Committee adopted Resolution 2025-14 accepting the DCA's calculations of the Township's present need of 100 units but seeking a downward adjustment of the 322-unit prospective need obligation to a recommended 53 units based on errors with the DCA land capacity analysis identified by the Township.

The Township also filed a "Complaint for a Declaratory of Compliance with the Fair Housing Act" 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, White Township received a challenge to the Township's calculations from the Fair Share Housing Center ("FSHC") and the New Jersey Builder's Association ("NJBA"). The Township and the Challengers entered into mediation through the Affordable Housing Dispute Resolution Program ("the Program") and ultimately agreed that White Township's prospective need obligation shall be 237 units. The Honorable Judge Miller, J.S.C. issued an order on April 8, 2025 ordering that White Township's present need shall be 100 units and the prospective need for the Fourth Round housing cycle shall be 237 units (Docket No. WRN-L-64-25).

#### **Municipal Summary**

White Township contains approximately 27.8 square miles (or 17,793 acres), situated in the mid-western part of Warren County, New Jersey along the east banks of the Delaware River. White Township shares municipal borders with Belvidere Town, Knowlton Township, Hope Township, Liberty Township, Oxford Township, Washington Township, and Harmony Township, all of which are within Warren County. White Township is traversed by US Route 46 and County Route 519, both of which provide access to I-80.

White Township is a predominantly rural and sparsely developed community.



White Township is situated entirely within the Highlands Region, with 7,801 acres being located within the Highlands Preservation Area and 9,992 acres within the Highlands Planning Area.

According to the 2001 State Development and Redevelopment Plan (SDRP) Policy Map, 8,662 acres of White Township are situated in the PA4 Rural Planning Area, 330 acres in the PA4B Rural/Environmentally Sensitive Planning Area, and 10 acres are situated in PA5 Environmentally Sensitive Planning Area. The SDRP also designates 698 acres of White Township as Parks and Natural Areas.

The White Township Future Wastewater Service Area ("FWSA") Map was adopted by the NJDEP as an amendment to the Warren County Pequest Municipal Utilities Authority ("MUA") Wastewater Management Plan on May 7, 2013. The FWSA Map allows for extended sewer service to existing developed areas along US Route 46 and County Route 519. The vast majority of properties in White Township, including many properties within the sewer service area, are served by on-site septic systems. Pursuant to the NJDEP Wastewater Management Planning Rules (N.J.A.C. 7:15), where individual subsurface sewage disposal systems will be utilized, the proposed development must not exceed the 2.0 mg/L nitrate planning standard. NJDEP estimates indicate that the residential density required to comply with the 2.0 mg/L standard in White Township would be between 4.3 and 5.2 acres per dwelling unit per, depending on the watershed.

## 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 Fair Housing Act and the laws of the State of New Jersey, while respecting the character and density of White Township.

According to the White Township 2020 Master Plan Reexamination Report, two of the overarching goals of the Master Plan are to "Preserve and enhance the rural character of White Township" and to "Provide a wide range of housing opportunities for current and prospective residents of the Township." These two goals are critical in the preparation of this Housing Element and Fair Share Plan. While White Township is a strong proponent of affordable housing, at the same time the Township seeks to maintain its rural atmosphere.

## Affordable Housing Obligation

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

1. Present Need (Rehabilitation Obligation): 100 units
2. Prior Round Obligation: 16 units
3. Third Round Obligation: 0 units
4. Fourth Round Obligation: 237 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 (“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, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;
- c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;
- d. An analysis of the existing and probable future employment characteristics of the municipality;
- e. A determination of the municipality's present and prospective fair share for low and moderate income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low and moderate income housing, as established pursuant to section 3 of P.L.2024, c.2 (C.52-27D-304.1);
- f. A consideration of the lands that are most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing;
- g. An analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c.273 (C.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.

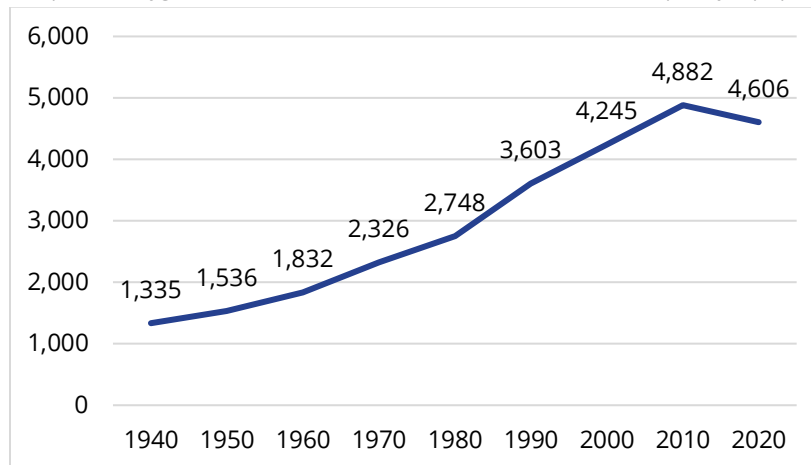
### III. Population Demographics

White Township's population has grown steadily from 1940 through 2010, with an average of about 50 new residents per year over the 70 year period. The periods that saw the greatest growth was 1980 to 1990 (31 percent) and 1960 to 1970 (27 percent). As of the 2020 Census, the population of White Township was 4,606, which is 276 residents less than its peak of 4,882 in 2010. As of the 2023 American Community Survey ("ACS"), the White Township's population was 4,646. See the table below for additional details.

**Population Growth**

Year	Population	Change	Percent
1940	1,335	--	--
1950	1,536	201	15.1%
1960	1,832	296	19.3%
1970	2,326	494	27.0%
1980	2,748	422	18.1%
1990	3,603	855	31.1%
2000	4,245	642	17.8%
2010	4,882	637	15.0%
2020	4,606	-276	-5.7%

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 North Jersey Transportation Planning Authority ("NJTPA") projects that the Township's population will grow to 5,358 residents by 2050 from their baseline 2015 population of 4,820. This represents an increase of 538 residents, or an average increase of approximately 15 residents annually over 35 years. However, as noted above, the Township's estimated population according to the 2023 ACS is 4,646, which is 214 less than the 2015 baseline population used by NJTPA.

### Population Projection

Year	Population	Change	Percent
2015	4,820	---	---
2020	4,606	-214	-4.4%
2050	5,358	752	16.3%

Source: NJTPA Plan 2050, Appendix E, 2050 Demographic Forecasts,  
<https://www.njtpa.org/plan2050>; 2020 Census Table P1

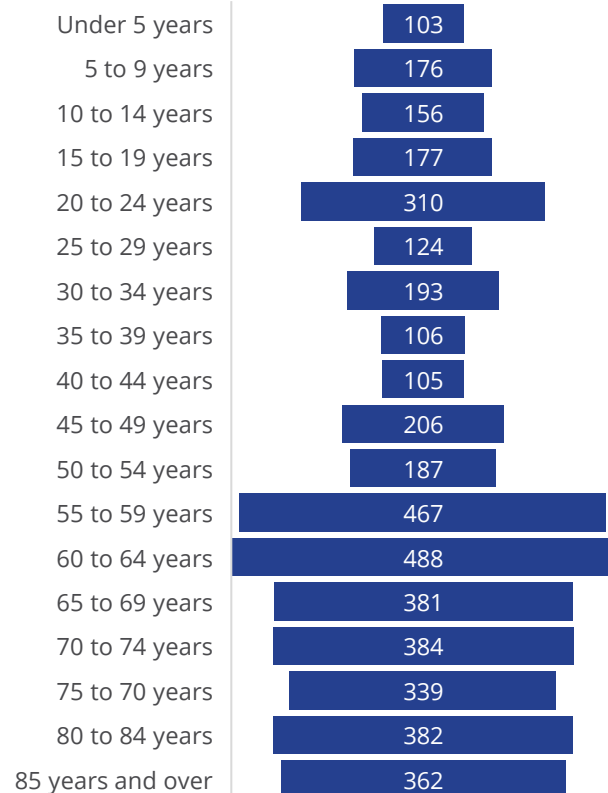
### Age Distribution of Population

The 2023 ACS estimates just 13.2 percent of White Township's population was 19 years or younger, while 39.8 percent of the population was 65 years or older. The largest age cohort was estimated to be those aged 60 to 65 years, which comprised 10.5 percent (488) of the Township's population. Residents aged 55 to 59 years comprised the second-largest age cohort at 10.1 percent (467) of the population, followed by those aged 70 to 74 years at 8.3 percent (384) of the population. The median age was estimated at 60.2 years in the 2023 ACS. See the table and chart below for further details.

### Population by Age Cohort

Age	Total	Percent
Under 5 years	103	2.2%
5 to 9 years	176	3.8%
10 to 14 years	156	3.4%
15 to 19 years	177	3.8%
20 to 24 years	310	6.7%
25 to 29 years	124	2.7%
30 to 34 years	193	4.2%
35 to 39 years	106	2.3%
40 to 44 years	105	2.3%
45 to 49 years	206	4.4%
50 to 54 years	187	4.0%
55 to 59 years	467	10.1%
60 to 64 years	488	10.5%
65 to 69 years	381	8.2%
70 to 74 years	384	8.3%
75 to 79 years	339	7.3%
80 to 84 years	382	8.2%
85 years and over	362	7.8%
<b>Total</b>	<b>4,646</b>	<b>100%</b>

Source: 2023 ACS Table S0101



## Household Size & Type

According to the 2023 ACS, White Township had 2,209 households of various types. A majority were married-couple households, which comprised just over 46.2 percent of all households. Of those, 155 had children under 18 years old. Male householders with no spouse present comprised 15.6 percent of all households, while female householders with no spouse present comprised only 37.3 percent. Of all households with no spouse present, 67 had children under the age of 18 (3 percent), while 862 were living alone (39 percent). See the table on the following page for complete details.

### Household Type

Type	Number	Percent
Married-couple	1,021	46.2%
with children under 18	155	7.0%
Cohabiting couple	21	1.0%
with children under 18	0	0.0%
Male householder, no spouse	344	15.6%
with children under 18	0	0.0%
living alone	222	10.0%
Female householder, no spouse	823	37.3%
with children under 18	67	3.0%
living alone	640	29.0%
<b>Total</b>	<b>2,209</b>	<b>100%</b>

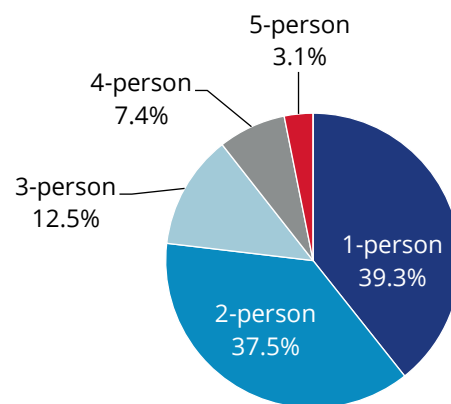
Source: 2023 ACS Table DP02

The most common household size in White Township was estimated to be one-person households, which comprised 39 percent of households in 2023. Two-person households comprised the second-largest number of households at just under 37.3 percent. Finally, three-person households comprised 12.4 percent of the 2,209 households in White Township. The table and pie chart below graphically illustrate the household size composition in White Township. Additionally, the 2023 ACS estimated the average household size at 2.03 persons, which is less than reported in the 2010 Census (2.23 persons).

### Household Size

Size	Total	Percent
1-person	862	39.0%
2-person	823	37.3%
3-person	275	12.4%
4-person	163	7.4%
5-person	69	3.1%
6-person	17	0.8%
7+ person	0	0.0%
<b>Total</b>	<b>2,209</b>	<b>100%</b>

Source: 2023 ACS Table B11016



## Income & Poverty Status

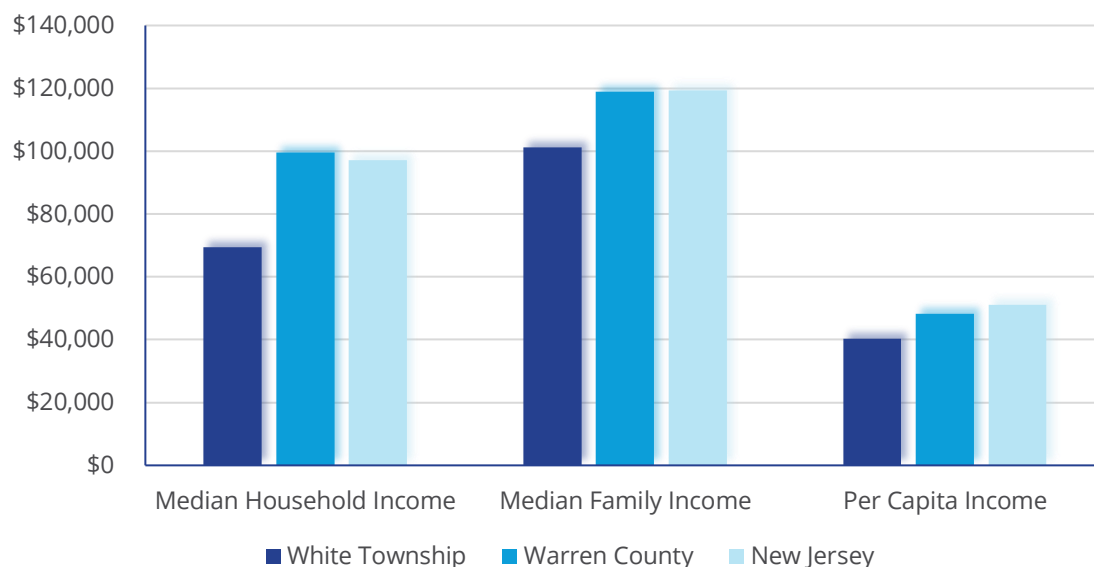
The 2023 ACS estimated the median household income for the White Township to be \$69,519, which is over \$30,000 less than Warren County's and a little over \$27,000 less than the State's. Similarly, the median family income for White Township was estimated at \$101,240, which is over \$17,000 below the County's and \$18,000 below the State's. Finally, the Township's per capita income was estimated at \$40,249, which is less than the County's and the State's. Based on this data, residents of White Township represent the lower end of the high incomes of Warren County and the median State incomes. This is reflected in the poverty rates of individuals and families estimated in the 2023 ACS. White Township's poverty rate for individuals was estimated at 9.5 percent, which is less State's by only 0.2 percent and more than the County's by more than 5.7 percent. The Township's poverty rate for families was estimated at 3.9 percent, which is 1.6 percent more than the County's and less than the State's by 3.0 percent. The table and bar chart below provide a comparison between income and poverty characteristics.

**Income and Poverty Characteristics**

Income Type	White Township	Warren County	New Jersey
Median Household Income	\$69,519	\$99,596	\$97,126
Median Family Income	\$101,240	\$118,994	\$119,240
Per Capita Income	\$40,249	\$48,232	\$50,995
Poverty Status (Percent of People)	9.5%	3.8%	9.7%
Poverty Status (Percent of Families)	3.9%	2.3%	6.9%

Source: 2023 ACS Table DP03

**Income Characteristics**





According to the 2023 ACS, only 5.4 percent (120) of households in White Township earn over \$200,000 annually. Household earning \$100,000 or more annually were estimated to include 813 households or 36.8 percent of all households in White Township. Over 49 percent of household in Warren County earned at least \$100,000 annually, including 13.7 percent earning more than \$200,000. Households in New Jersey earning \$100,000 or more according to the 2023 ACS included 48.8 percent of households. Almost 40 percent of households in White Township earned less than \$50,000 per year. See the table below for additional details.

### Household Income

Income Range	White Township		Warren County		New Jersey	
	Total	Percent	Total	Percent	Total	Percent
Less than \$10,000	12	0.5%	1,650	3.7%	139,920	4.1%
\$10,000 to \$14,999	100	4.5%	954	2.1%	102,608	3.0%
\$15,000 to \$24,999	160	7.2%	2,402	5.3%	185,476	5.4%
\$25,000 to \$34,999	410	18.6%	2,270	5.1%	196,998	5.7%
\$35,000 to \$49,999	185	8.4%	3,230	7.2%	281,264	8.2%
\$50,000 to \$74,999	282	12.8%	6,714	14.9%	455,543	13.2%
\$75,000 to \$99,999	247	11.2%	5,349	11.9%	397,730	11.6%
\$100,000 to \$149,999	523	23.7%	10,482	23.3%	620,335	18.0%
\$150,000 to \$199,999	170	7.7%	5,733	12.8%	396,837	11.5%
\$200,000 or more	120	5.4%	6,159	13.7%	661,451	19.2%
<b>Total</b>	<b>2,209</b>	<b>100%</b>	<b>44,943</b>	<b>100%</b>	<b>3,438,162</b>	<b>100%</b>

Source: 2023 ACS Table DP03

## IV. Housing Demographics

### Housing Type

The 2023 ACS estimated the Township's housing stock at 2,255 units, which contains a variety of residential dwellings. Single-family, detached dwellings comprised a majority of the housing stock with 1,538 units or 68.2 percent of all dwellings. One-unit, attached dwellings (i.e. townhomes) only comprised 22 units (1.0 percent), while two-family dwellings comprised 58 units (2.6 percent) of the housing stock. The Township contains 499 multi-family units (22.1 percent), which are buildings containing five or more dwelling units. It should be noted that the 2023 ACS estimated 138 dwellings to be mobile homes. See the table below for details.

**Housing Units in Structure**

Structure	Number of Units	Percent
1-unit, detached	1,538	68.2%
1-unit, attached	22	1.0%
2 units	58	2.6%
3 or 4 units	0	0.0%
5 to 9 units	13	0.6%
10 to 19 units	200	8.9%
20 or more units	286	12.7%
Mobile Home	138	6.1%
Other (boat, RV, van, etc.)	0	0.0%
<b>Total</b>	<b>2,255</b>	<b>100%</b>

Source: 2023 ACS Table DP04

### Occupancy Status

Of the 2,255 residential units, 2,209 units, or 98 percent of the housing stock, was occupied. This includes 1,631 owner-occupied units and 578 rental units. The 46 vacant units only included properties classified as "other". See the table on the following page for details.

The 2023 ACS estimated the average household size in White Township was 2.03 persons, while the average family size was 2.66 persons. Comparing tenure, the average owner-occupied household was 2.20, while the average renter-occupied household was 1.56 persons.

### Occupancy Status

Status	Units	Percent
Occupied Total	2,209	98.0%
Owner Occupied	1,631	73.8%
Renter Occupied	578	26.2%
Vacant Total	46	2.0%
For rent	0	0.0%
Rented, not occupied	0	0.0%
For Sale	0	0.0%
Sold, not occupied	0	0.0%
Seasonal	0	0.0%
For migrant workers	0	0.0%
Other	46	100.0%
<b>Total</b>	<b>2,255</b>	<b>100%</b>

Source: 2023 ACS Tables DP04 & B25004

### Value & Rent of Housing Stock

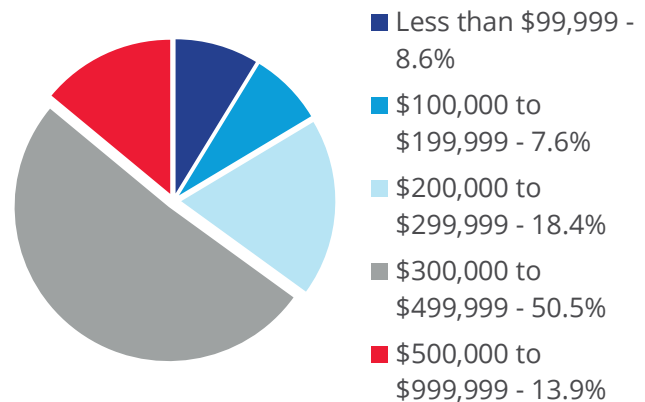
The 2023 ACS provided estimates for owner-occupied housing units in White Township. According to the data, a plurality of homes in the Township were valued between \$300,000 and \$499,999 (50.5 percent). Homes worth between \$200,000 and \$299,999 comprised 18.4 percent of the owner-occupied housing units, while only 7.6 percent of homes were estimated to be worth between \$100,000 and \$199,999. An estimated 13.9 percent of homes (226 units) were valued between \$500,000 and \$999,999, while only 16 homes were estimated to be worth more than \$1 million. The median home value estimated in the 2023 ACS was \$339,700. 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	141	8.6%
\$100,000 to \$199,999	124	7.6%
\$200,000 to \$299,999	300	18.4%
\$300,000 to \$499,999	824	50.5%
\$500,000 to \$999,999	226	13.9%
\$1,000,000 or more	16	1.0%
<b>Total</b>	<b>1,631</b>	<b>100%</b>

Median Value \$339,700

Source: 2023 ACS Table DP04

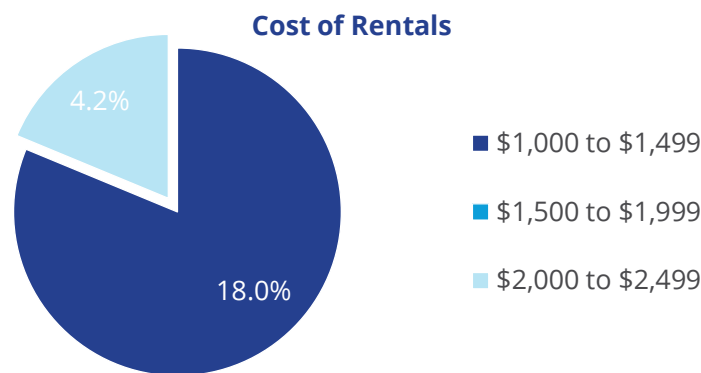


The median rent in the Township was estimated at \$761 per the 2023 ACS. Looking at the rent ranges, over three quarters of the Township's rental units fell below \$1,000 per month (75.3 percent). Units that cost between \$1,000 and \$1,499 comprised only 18 percent of rentals (104 units), while 4.2 percent (24 units) cost between \$2,000 and \$2,499 per month. 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	435	75.3%
\$1,000 to \$1,499	104	18.0%
\$1,500 to \$1,999	0	0.0%
\$2,000 to \$2,499	24	4.2%
\$2,500 to \$2,999	0	0.0%
\$3,000 or more	0	0.0%
No rent paid	15	2.6%
<b>Total</b>	<b>578</b>	<b>100%</b>
Median (in dollars)	\$761	

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.

Most of the Census indicators available at the municipal level indicate a sound housing stock. Approximately 118 occupied homes were estimated to not contain complete kitchen facilities, while 21 homes within the Township lack adequate heat.

#### Condition of Housing Stock

Condition	Number of Units	Percent
Lack of complete plumbing	0	0.00%
Lack of complete kitchen	118	5.34%
Lack of telephone service	0	0.0%
Lack of adequate heat	21	1.0%
<b>Total Occupied Housing Units</b>	<b>2,209</b>	<b>6.29%</b>

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, all of the Township's 1,475 occupied housing units contained 1.00 or less persons per room.

#### Occupants Per Room

Occupants	Number of Units	Percent
1.00 or less	2,209	100.0%
1.01 to 1.50	0	0.0%
1.51 or more	0	0.0%
<b>Total</b>	<b>2,209</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 below and bar graph on the following page provide the 2023 ACS estimates for the age of housing units in White Township. An estimated 640 units, or 28.4 percent, of the Township's housing stock were constructed prior to 1970 with over 13 percent being constructed prior to 1940. Residential development in White Township boomed during the 1980s and 1990s as an estimated 40.1 percent of the Township's housing stock was constructed during this era. Since 2000, approximately 635 homes have been constructed. See the table and chart below and on the following page for more details.

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 15 certificates

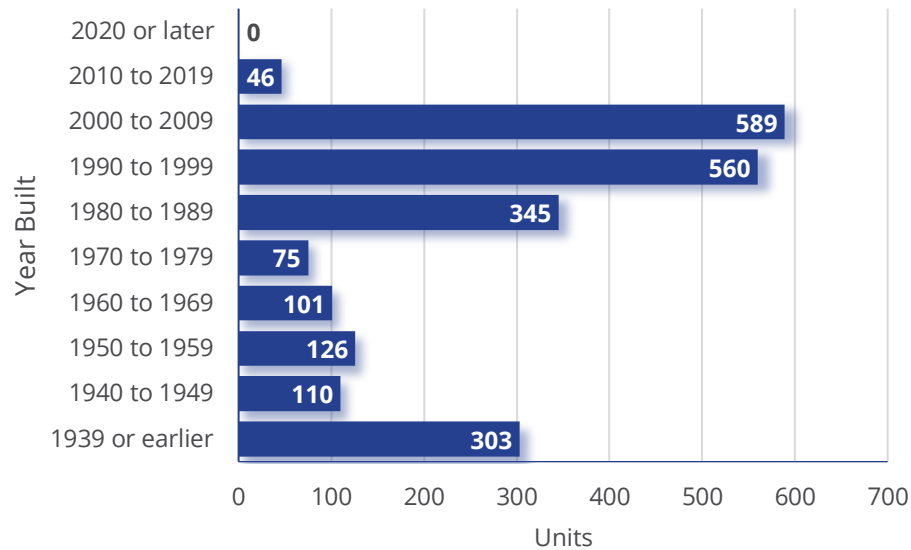
of occupancy have been issued for new residential units since the beginning of 2020. See the tables on page 25 for additional details.

### Age of Housing Stock

Year Built	Number of Units	Percent
1939 or earlier	303	13.4%
1940 to 1949	110	4.9%
1950 to 1959	126	5.6%
1960 to 1969	101	4.5%
1970 to 1979	75	3.3%
1980 to 1989	345	15.3%
1990 to 1999	560	24.8%
2000 to 2009	589	26.1%
2010 to 2019	46	2.0%
2020 or later	0	0.0%
<b>Total</b>	<b>2,255</b>	<b>100%</b>

Source: 2023 ACS Table DP04

### Age of Housing Stock



## V. Employment Demographics

The 2023 ACS estimated that White Township had 1,941 residents over the age of 16 in the workforce. Of those, 1,905 (98.1 percent) were employed, which translates to a 1.9 percent unemployment rate. A majority of workers were private wage and salary worker (84 percent). However, 9.9 percent were workers employed by the government and 4.2 percent were self-employed. See the table below for details.

**Class of Workers**

Class	Workers	Percent
Private wage and salary workers	1,631	84.0%
Government workers	192	9.9%
Self-employed workers	82	4.2%
Unpaid family workers	0	0.0%
<b>Total employed residents</b>	<b>1,905</b>	<b>98.1%</b>
Total unemployed residents	36	1.9%
<b>Total residents in workforce</b>	<b>1,941</b>	<b>100%</b>

Source: 2023 ACS Table DP03

## Occupational Characteristics

The 2023 ACS estimated 602 workers were employed in sales and office fields, which represents 31.6 percent of the Township's employed residents. Workers in management, business, science, and arts fields totaled 29.1 percent of employed residents, while 17.1 percent were employed in production, transportation, and material moving jobs. See the table below for details.

**Occupation of Employed Population**

Occupation	Workers	Percent
Management, business, science, & arts	554	29.1%
Service	219	11.5%
Sales & office	602	31.6%
Natural resources, construction, & maintenance	204	10.7%
Production, transportation, & material moving	326	17.1%
<b>Total</b>	<b>1,905</b>	<b>100%</b>

Source: 2023 ACS Table DP03

## Employment Projections

NJTPA's Plan 2050 estimates that the number of available jobs in White Township will increase from 833 reported in 2015 to 1,692 in 2050. This represents an increase of 859 jobs, or an average annual increase of 24 jobs annually. However, as detailed in the following section, the New Jersey



Department of Labor and Workforce Development estimated a total of 126 jobs in White Township in 2023, which is 1,566 less than projected by NJTPA. Utilizing this number, roughly 58 new jobs would need to be created within the Township each year for the next 27 years.

### Employment Projection

Year	Jobs	Change	Percent
2015	833	---	---
2050	1,692	859	103.1%

Source: NJTPA Plan 2050, Appendix E, 2050 Demographic Forecasts,  
<https://www.njtpa.org/plan2050>

### 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 no private sector jobs within the Township. It should be noted that the Municipal Report redacted data from multiple private-sector industries for not meeting publication standards (construction, manufacturing, retail trade, 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 White Township had an average of 126 private-sector jobs provided by 4 employers, including the redacted data. Additionally, the QCEW data reflects employment within White Township, regardless of where the employee lives.

Based on the 2023 QCEW data provided, there were no private sector jobs reported in the Township. In the public sector, the 2023 QCEW Municipal Report indicated that there were two state government employers, which had an average of 13 employees and three local government employers, which had an average of 68 jobs. This included one local government education employer providing an average of 53 jobs. See the table on the below for data on each sector.

### Private and Public Sector Employment (2023)

Industry	Establishments		Employees		Annual Wages
	Total	Percent	Total	Percent	
Agriculture	-	-	-	-	-
Retail Trade	-	-	-	-	-
Transportation/Warehousing	-	-	-	-	-
<b>Private Sector Total</b>	<b>4</b>	<b>100%</b>	<b>126</b>	<b>100%</b>	<b>\$45,829</b>
State Government	2	40.0%	13	16.0%	75,964
Local Government	3	60.0%	68	84.0%	\$66,843
Local Government Education	1	20.0%	53	65.4%	\$65,965
<b>Public Sector Total</b>	<b>5</b>	<b>100%</b>	<b>81</b>	<b>100%</b>	<b>\$69,591</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 30 and 34 minutes, which was made by 502 workers (29 percent). A commute between 20 and 24 minutes followed with 214 workers (12.4 percent). Rounding off the top three was a commute of 10 to 14 minutes, which was reported by 200 workers (11.5 percent). The mean travel time was estimated at 36.8 minutes. It should be noted that 237 workers (13.7 percent) reported a commute of more than one hour. Additionally, 145 workers, or 7.7 percent of the Township's employed residents, reported working from home. See the table below for additional details.

**Commute Time**

Travel Time (minutes)	Workers	Percent
Less than 5	42	2.4%
5 to 9	59	3.4%
10 to 14	200	11.5%
15 to 19	194	11.2%
20 to 24	214	12.4%
25 to 29	32	1.8%
30 to 34	502	29.0%
35 to 39	44	2.5%
40 to 44	71	4.1%
45 to 59	137	7.9%
60 to 89	116	6.7%
90 or more	121	7.0%
<b>Total</b>	<b>1,732</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, taking into account, 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, the issuance of residential certificates of varies from year to year in the White Township. From 2013 to 2015, only two certificates of occupancy were issued, while two were issued in 2017 and one in 2018. Of those, all were for single- or two-family dwelling. Similarly, one certificate was issued in 2020 and two in 2021. From 2022 to 2023, there were zero certificates issued. It should be noted that the Construction Reporter indicates no reports were received from White Township during 2024. Since 2013, a total of 13 demolition permits were issued, which equates to a net development of -5 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	1	0	1	0	2	1	0	1	2	0	0	NR	8
Demolitions	1	0	1	2	3	1	2	0	3	0	0	NR	13
<b>Net Development</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-2</b>	<b>-1</b>	<b>0</b>	<b>-2</b>	<b>1</b>	<b>-1</b>	<b>0</b>	<b>0</b>	<b>NR</b>	<b>-5</b>

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

Projecting into the future for the Fourth Round period, the Township anticipates 170 new housing units as part of the White Township Plaza redevelopment area. Other than that, the Township is not anticipating any significant residential development. Based on recent trends, the Township expects approximately 6 new homes to be built over the next 10 years.

## VII. Capacity for Fair Share

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

- 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

The ability to accommodate White Township's present and prospective affordable housing needs is determined by three components – available land, water capacity and sewer capacity. Land development is limited by environmental constraints, such as wetlands, flood plains, easements (conservation, sewer, water, power utility, etc.), parcel size and municipal regulations.

White Township conducted a vacant land analysis to identify vacant and developable properties remaining in the Township that may be suitable for affordable housing development. The study found that there are developable lands within the sewer service area.

Due to the rural and environmentally sensitive nature of the Township, no other suitable lands have been identified as having a realistic development potential to provide affordable housing. This is largely due to the lack of public water and wastewater services, as discussed below.

### Utility Capacity

#### Wastewater

The White Township Future Wastewater Service Area ("FWSA") Map was adopted by the NJDEP as an amendment to the Warren County Pequest Municipal Utilities Authority ("PRMUA") Wastewater Management Plan on May 7, 2013. The FWSA Map allows for extended sewer service to existing developed areas along US Route 46 and County Route 519. Based on the 2014 Capacity Study for the PRMUA treatment plant in Belvidere, the plant has is projected to exceed its firm capacity at full buildout of the Belvidere and White Township sewer service areas. However, the plant is currently only operating at 0.3 MGD, which is about 60% of its firm capacity (0.5 MGD). Therefore, the plant is expected to have sufficient capacity to serve the proposed mixed-use inclusionary development within the White Township Plaza redevelopment area.

The vast majority of properties in White Township, including many properties within the sewer service area, are served by on-site septic systems. Pursuant to the NJDEP Wastewater Management Planning Rules (N.J.A.C. 7:15), where individual subsurface sewage disposal systems will be utilized, the proposed development must not exceed the 2.0 mg/L nitrate planning standard. NJDEP estimates indicate that the residential density required to comply with the 2.0 mg/L standard in White Township would be between 4.3 and 5.2 acres per dwelling unit, depending on the watershed.

## Water

There is no public water service in White Township. The American Water Company has facilities in Belvidere which provide potable water to limited developments along County Route 519, including the Brookfield residential development and two areas near the Warren County Offices on Route 519. The remainder of the Township is served by private on-site wells.

## Appropriate Locations for Affordable Housing

There are several vacant and developable properties within the sewer service area that could be suitable or appropriate for the construction of low- and moderate-income. The Township has identified one property specifically that will be designated as inclusionary housing sites to meet the obligations for the Fourth Round, which is the White Township Plaza Redevelopment Area located on Lot 1 in Block 53. The site is discussed in greater detail within Chapter X of this HEFSP.

Existing structures appropriate for conversion to affordable housing may include ranch-style homes, which may be cost effective to buy and convert to an alternative living arrangement. As for structures suitable for rehabilitation, according to the Rehabilitation Obligation, 100 homes within the Township are in need of a major system repair (e.g. roof, electric, plumbing, etc.).

## Potential Affordable Housing Developers

Presently, there is only one developer who proposing and inclusionary project, which is the owner of the White Township Plaza shopping center recently designated as an area in need of redevelopment. No other developers have expressed an interest to provide affordable housing in White Township.

## Anticipated Development Patterns

Development patterns within White Township are anticipated to follow the established zoning. White Township is zoned for detached single-family residences, garden apartments, mobile homes, low density residential, neighborhood commercial, community commercial, highway development, office, light industrial, industrial, industrial-quarry and soil removal and surface mining. (See the Zoning Map below for details.)



## Highlands Regional Master Plan Compliance

The Amended FHA lists the essential components of a municipality's housing element. NJSA 52-27D-310h. states the following:

*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.*

White Township has lands within both the Highlands Preservation Area and Planning Area. Approximately 44 percent of the Township is located within the Preservation Area with the remainder of the Township located in the Planning Area. Since White Township has not voluntarily conformed to the Highlands RMP, the Township does not need to address compliance in the Planning Area. White Township has not prepared a Highlands Buildout Report since it is not a fully conforming municipality.

Within the Preservation Area, White Township has adopted rural density zoning. The existing Windtryst Apartments are located within the Preservation Area. There are no other opportunities for redevelopment of existing developed lands within the Preservation Area that would be suitable for inclusionary or 100 percent affordable projects.

## State Development & Redevelopment Plan Consistency

P.L. 2024, c.2 amended the Fair Housing Act to include a new requirement for housing elements. NJSA 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 draft, the Township cannot opine on consistency until the final version is adopted. White Township has not received guidance from the State Planning Commission concerning water, wastewater, or multi-modal transportation.



## 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 March 18, 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 March 18, 2025. DCA's website is silent regarding the Commission, its annual required reports, studies, and/or recommendations. Without recommendations from the Commission, White Township 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 White Township's zoning ordinance that prohibits senior citizens from residing at the home of their extended families.

## 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.

#### 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 percent, but less than 80 percent, of the median gross regional household income. A low income household is one with a gross household income equal to 50 percent or less of the median gross regional household income. Very-low income households are those with a gross household income equal to 30 percent or less of the median gross household income. White Township is located in Region 2, which contains Essex, Morris, Union, and Warren Counties.

Using the Affordable Housing Professionals of New Jersey's latest chart on the regional income limits for Housing Region 2 in 2024, a four-person moderate income household is capped at \$103,533. Two-person moderate income households are capped at \$82,826, while two-person households could make up to \$51,766 to be considered a low-income household. The table on the following page provides the median, moderate, low, and very-low income limits for one-, two-, three-, and four-person households in Region 2.<sup>3</sup>

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<sup>3</sup> In October 2018, Judge Miller signed a vicinage wide income limits order applying to all of the 60 or so municipalities with cases in Somerset, Hunterdon, and Warren Counties. All of these municipalities can now utilize the most current income limits available as it applies both to towns that have settled and those that have not and reserves all rights on the methodology.

**2024 Regional Income Limits (Region 2)**

Income	Household Size			
	1 Person	2 Person	3 Person	4 Person
Median	\$90,591	\$103,533	\$116,475	\$129,416
Moderate	\$72,473	\$82,826	\$93,180	\$103,533
Low	\$45,296	\$51,766	\$58,237	\$64,708
Very-Low	\$27,177	\$31,060	\$34,942	\$38,825

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

## IX. Affordable Housing Obligation

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

### Four-Part Obligation

#### **Rehabilitation | 100 units**

White Township accepted DCA's rehabilitation obligation of 100 units for the Fourth Round.

#### **Prior Round (1987-1999) | 16 units**

The March 10, 2015 Supreme Court Order directed municipalities to use the Prior Round Obligation that COAH established in 1993, which was 16 units.

#### **Third Round (1999-2025) | 0 units**

In accordance with the Settlement Agreement with the Fair Share Housing Center, White Township has a Third Round Obligation of 0 affordable units to be addressed. This obligation was calculated by David N. Kinsey, PhD, FAICP, P.P. in his July 22, 2016 report "New Jersey Fair Share Housing Obligations for 1999-2025 (Third Round) Under Mount Laurel IV," prepared on behalf of the FSHC.

#### **Fourth Round (2025-2035) | 237 units**

As indicated in the April 8, 2025 Order setting the Fourth Round obligations, White Township's Fourth Round prospective need obligation is 237 units.

## X. Mechanisms & Credits

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

### Rehabilitation Credits

#### Warren County Housing Rehabilitation Program ("WCHRP")

Warren County operates a Housing Rehabilitation Program for qualified low and moderate income households that gives homeowners money to fix major systems (such as roofs, heating, structural, well, septic, etc.) of their home. In return for the rehabilitation money, the house must have a lien with 99-year affordability controls placed on the property. White Township has historically participated in the WCHRP and will continue to encourage residents to utilize the existing Warren County Housing Program to rehabilitate homes.

In the case of a shortfall, White Township will apply for a Small Cities/CBDG grant available through the Department of Community Affairs. The grant's purpose is to rehabilitate homes and encourage the construction of affordable housing. Other eligible costs include activities that support an affordable housing development, such as site assemblage, engineering, infrastructure improvements, and utilities hook ups. The Township intends to earmark funds from its total development fees projected to be collected over the next ten years for rehabilitation to supplement the existing rehabilitation mechanisms in the case of a shortfall of rehabilitation credits.

Pursuant to N.J.A.C. 5:93-5.2(f), rental units may not be excluded from a municipal rehabilitation program. The Warren County Housing Rehabilitation Program is only offered to qualifying owner-occupied units. The Township has requested a waiver from N.J.A.C. 5:93-5.2(f) so that a separate municipally operated rehabilitation program would not need to be created to handle the rental units. Pursuant to an email from Josh Bauers, Esq. of the Fair Share Housing Center, the FSHC agreed to the granting of a waiver for the Township's rental rehabilitation requirement provided that the Township continues to participate in the WCHRP. The Township requests that this waiver be carried forward to the Fourth Round as well.

### Prior Round Credits

#### Windtryst Apartments

In accordance with N.J.A.C. 5:93-3.2, municipalities may receive credit for units constructed between April 1, 1980 and December 15, 1986, provided the units are occupied by low or moderate income households and that the required controls on affordability are in place. White Township's Certified Third Round Plan includes 158 prior cycle credits in the Windtryst Apartments development, which was constructed in 1985. The Windtryst Apartment development is located along the east side of County Route 519 on Block 18, Lot 5. The 158 units are non-age-restricted rental units with 50-year deed restrictions, which expire in 2035. The project was developed under the Farmers Home Administration (FmHA) Rural Rental Housing Program and constructed between 1982 and 1985. White Township intends to assign 16 units from this development to address its entire prior round obligation and rental obligation.

Windtryst Apartments are administered by Windtryst Limited, which has assumed the responsibility of Management Agent for the past 30 years and is a HUD approved management organization.

Windtryst Limited is responsible to conduct the required affirmative marketing, place income eligible households in the units, enforce the terms of the deed restriction and re-rent the units upon vacancy. Windtryst Apartments fully satisfy not only the total Prior Round obligation, but also the rental obligation.

### **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, White Township has a rental obligation of 4 units and, therefore, may apply up to 4 bonus credits. White Township will apply 4 rental bonus credits for the existing Windtryst Apartments towards Prior Round obligation.

### **Third Round Credits**

In accordance with the July 26, 2016 report from the Fair Share Housing Center, White Township has a Third Round Obligation of 0 units. Therefore, no credits are assigned to the Third Round.

### **Fourth Round Credits**

#### **Windtryst Apartments**

The FHA (as amended by Assembly Bill A4) provides the following regarding credits and bonus credits from prior rounds:

To the extent a municipality has credits, including bonus credits, from units created during a prior round that are otherwise permitted to be allocated toward the municipality's unfulfilled prior round obligation or present or prospective need obligation in an upcoming round, the municipality shall be entitled to rely on the rules, including rules for bonus credits, applicable for the round during which those credits were accumulated. If a municipality has credits in excess of its prior round obligations, and such excess credits represent housing that will continue to be deed-restricted and affordable through the current round, the municipality may include such housing, and applicable bonus credits, towards addressing the municipality's new calculation of prospective need.

Therefore, White Township is permitted to utilize the Second Round Rules (N.J.A.C. 5:93-5.15) to apply credits and rental bonus credits from the Windtryst Apartments to the Fourth Round prospective need obligation. White Township intends to apply the 142 excess credits and 60 rental bonus credits from the Windtryst Apartments development towards the Fourth Round prospective need.

#### **White Township Plaza Redevelopment (Lot 1 in Block 53)**

Lot 1 in Block 53 is a 10-acre parcel located with primary frontage on US Route 46. The lot is a triangular parcel with road frontages on all sides, including Water St, Massenatts Road, US Route 46, and Manunka Chunk Road. The property is generally isolated, with only a freestanding Rite-Aid pharmacy to the north, across Route 46. To the east, across Water Street, is the Pequest River. To the west, across Massenatts Road, is a religious convent on over 76 acres. To the northwest, across Manunka Chunk Road, is a 250-acre industrial complex for DSM Nutritional Products.

The property currently contains a retail strip mall with vehicular entrances along Massenatts Rd and right-in/right-out access to US Route 46 eastbound. Presently, only four of the fourteen tenant spaces remain occupied, representing about 28 percent of the 72,000-square foot shopping center.

The property is within the sewer service area and is served by the Warren County (Pequest River) Municipal Utilities Authority (PRMUA).

On May 11, 2022, the White Township Committee adopted a resolution directing the Planning Board to undertake a preliminary investigation, pursuant to the NJ Local Redevelopment and Housing Law, N.J.S.A. 40A:12A-1 et seq., to determine whether property known as Lot 1 in Block 53 situated on US Route 46, qualifies as a non-condemnation area in need of redevelopment.

The Planning Board conducted a public hearing on October 6, 2022, and adopted a resolution on November 8, 2022, recommending that the Township Committee designate the property as a Non-Condensation Area in Need of Redevelopment.

On December 14, 2022, the Township Committee adopted Resolution 2022-48, designating the property known as Lot 1 in Block 53 as a Non-Condensation Area in Need of Redevelopment and authorizing a Redevelopment Plan to be prepared for the property.

On March 12, 2025, the Township Committee adopted Resolution #\_\_\_ adopting the Redevelopment Plan for the area in need of redevelopment. The Redevelopment Plan permits a mixed use development with three and four-story buildings containing commercial uses on the ground floor and residential uses on the upper floors. The maximum permitted residential density is 17 dwelling units per acre, which is expected to yield 170 units, including 34 affordable housing units at a 20 percent set-aside.

The Township is working with the anticipated redeveloper on a Redevelopment Agreement. Then the redeveloper may submit an application to the Planning Board for site plan approval. White Township believes that this site represents a realistic opportunity to provide affordable housing and intends to apply 34 credits from the development to the Fourth Round obligation.

The affordable housing rules require municipalities to designate sites that are available, suitable, developable and approvable, as defined in NJAC 5:93-1. These terms are defined below:

- Approvable site means a site that may be developed for low- and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low- and moderate-income housing.
- Available site means a site with clear title, free of encumbrances which preclude development for low- and moderate-income housing.
- Developable site means a site that has access to appropriate water and sewer infrastructure and is consistent with the applicable areawide water quality management plan (including the wastewater management plan) or is included in an amendment to the areawide water quality management plan submitted to and under review by NJDEP.
- Suitable site means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in NJAC 5:93-4.

The property meets the four prongs of the rules as follows:

- Approvable site – White Township has adopted a Redevelopment Plan for the property which permits mixed-use inclusionary residential housing at a density of 17 dwelling units per acre with a 20% affordable housing set-aside. The Township is currently in the process of naming a redeveloper for the site. The Township anticipates that the redeveloper will submit an application to the Planning Board in Fall 2025.
- Available site – The owner of the property is in the process of being designated as the Redeveloper by the Township and will enter into a Redevelopers Agreement. The Township is unaware of any title or encumbrance issue.
- Developable site – The property is in the sewer service area. The PRMUA has sufficient capacity to provide wastewater treatment for the project.
- Suitable site – The property is isolated from other properties due to the street frontages on all side. The site is located along the US Route 46 highway corridor in the Township, providing adequate access for the proposed development. There are no known environmentally sensitive features encumbering the site from redevelopment. The proposed development is anticipated to be concentrated within the existing areas of disturbance.

Based on the information above the Township anticipates that the project will yield 34 affordable units which are creditable under NJAC 5:93-5.6 (inclusionary development).

### **Rental Bonus Credits**

Pursuant to the Amended FHA, the Township may utilize the bonus credits from the prior round rules towards the current round. Per N.J.A.C. 5:93-5.15(d), the Township may claim 2 units of credit for non-age-restricted rental units. Rental bonuses for the Prior Round are capped at the rental obligation, which is 25 percent of the new construction obligation. For the Fourth Round, White Township has a rental obligation of 60 units and, therefore, may apply up to 60 bonus credits. White Township will apply 60 rental bonus credits for the existing Windtryst Apartments towards Fourth Round obligation.

### **Supportive And Special Needs Housing Credits or Habitat for Humanity Home**

After applying the 142 excess credits and 60 bonus credits for Windtryst Apartments, as well as the 34 credits from the White Township Plaza redevelopment plan, the Township has 236 credits to claim for the Fourth Round, resulting in a 1 unit shortfall from the 237-unit prospective need obligation. To fill this gap, the Township intends to seek a group home or habitat for humanity home.



## Summary of Mechanisms & Credits

The table below provides a summary of the mechanisms, credits and bonuses this HEFSP proposes.

Mechanisms & Credits							
Mechanism	Credit Type	Tenure	Age-Restricted	Status	Credit	Bonus	Total
<i>Rehabilitation</i>							
Warren County Rehabilitation Program	Rehabilitation			Proposed	100	0	100
<b>Total</b>					<b>100</b>	<b>0</b>	<b>100</b>
<i>Prior Round Credits</i>							
Windtryst Apartments	Prior Cycle	Rental	No	Existing	16	0	16
<b>Total</b>					<b>16</b>	<b>0</b>	<b>16</b>
<i>Third Round Credits</i>							
N/A	N/A	N/A	N/A	N/A	0	0	0
<b>Total</b>					<b>0</b>	<b>0</b>	<b>0</b>
<i>Fourth Round RDP Credits</i>							
Windtryst Apartments	Prior Cycle	Rental	No	Existing	142	60	142
White Township Plaza Redevelopment	Inclusionary	Rental	No	AINR	34	0	51
Group Home or Habitat for Humanity Home	TBD	TBD	No	Proposed	1	0	1
<b>Total</b>					<b>176</b>	<b>60</b>	<b>237</b>

## XI. Appendix