GREENWICH TOWNSHIP
Gloucester County, State of New Jersey

Housing Element of the Master Plan
and
Fair Share Plan

Adopted: April 6, 2009

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J. Timothy Kernan, P.E., P.P., C.M.E.
Professional Engineer, N.J. License No. 37101
Professional Planner, N.J. License No. 05400
Certified Municipal Engineer

_____________________________Date_________
William J. Harris, P.P.
Professional Planner, N.J. License No. 01767

Prepared by

kernan
Consulting Engineers

J. TIMOTHY KERNAN, INC.
Kingsway Commons
935 Kings Highway Suite 100
Thorofare, NJ 08086
P: 856.251.9500; F: 856.853.1310

FORWARD

This document represents Greenwich Township's Housing Element and Fair Share Plan for consideration and adoption by the Planning Board and Township Council. Once adopted, the document will be submitted to the New Jersey Council on Affordable Housing ("COAH") in order to obtain substantive certification. The Township is seeking substantive certification to support funding requests for the development of affordable housing from such agencies as the New Jersey Housing and Mortgage Finance Agency and the Department of Community Affairs. The content of the Housing Element and Fair Share Plan follows requirements established by COAH and covers the period retroactively to January 1, 2004 through December 31, 2018.

The Housing Element and Fair Share Plan has been prepared in compliance with COAH regulations of June 2, 2008 and October 20, 2008, which were adopted in response to a State Appellate Court decision of January 2007. That ruling invalidated the growth share methodology that was part of COAH's regulations for the above-referenced time frame.

As background, in its landmark 1975 decision[1] referred to now as *Mt. Laurel I*, the New Jersey Supreme Court ruled that developing municipalities have a constitutional obligation to provide a realistic opportunity for the construction of low and moderate income housing. In its 1983 *Mt. Laurel II* decision[2], the Court clarified that this obligation is an affirmative one and assigned an affordable housing obligation to all municipalities. In 1985, the Fair Housing Act ("FHA"), at *NJSA* 52:27D-301 et seq., was enacted as the legislative response to the Supreme Court rulings. The FHA created COAH as the administrative alternative to the Courts. The FHA also made the Housing Plan Element a required part of a municipality's Master Plan. Municipalities that choose to adopt a Housing Element and Fair Share Plan and petition to participate in the COAH certification process are granted a presumption of validity against allegations of exclusionary zoning, also known as builder remedy lawsuits. Petitioning COAH allows a municipality to maintain control of its planning and zoning options in addressing its affordable housing obligation. Greenwich Township's continued participation in the COAH process enables the Township to address its affordable housing obligation through a process that is intended to minimize exposure to costly litigation and to provide a balanced approach in addressing its share of the statewide need for affordable housing.

INTRODUCTION

The following is an introduction to the housing element of a master plan, the fair share plan requirements of COAH and the constitutional requirement for the provision of affordable housing.

The Housing Element is a master plan element required by the Municipal Land Use Law ("MLUL") per *NJSA* 40:55D-1 et seq. This Housing Element/Fair Share Plan has been

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[1] Southern Burlington NAACP v. Township of Mt. Laurel, 67 NJ 151 (1975)

[2] Southern Burlington NAACP v. Township of Mt. Laurel, 92 NJ 158 (1983)

prepared in accordance with the MLUL, as well as with the Third Round substantive regulations (*NJAC* 5:97 et seq.) and procedural regulations (*NJAC* 5:95 et seq.) of COAH. COAH adopted its Third Round methodology and regulations, which became effective on December 20, 2004. These regulations created a “growth share” methodology which marked a significant departure from COAH’s prior two rounds of affordable housing methodology. The Third Round methodology implemented a growth share approach that linked the production of affordable housing with residential and non-residential development that occurred in a municipality between January 1, 2004 and January 1, 2014. In that Third Round growth share methodology COAH adopted ratios that required one affordable unit for every 8 market rate housing units constructed and one affordable unit for every 25 jobs developed based on a ratio of job per 1,000 square feet of new non-residential development by Construction Code Use Group. This was a significant change from the methodology COAH used in the first and second rounds which assigned an affordable housing obligation as an absolute number to each municipality in those two rounds.

That growth share methodology was successfully challenged by the New Jersey Builders Association and certain affordable housing advocacy groups in 2006. The Appellate Court ruled in January of 2007 that COAH’s growth share methodology was invalid for determining a municipality’s fair share obligation based on the state Supreme Court’s Mt Laurel decisions. The court directed COAH to adopt regulations that generated an affordable housing allocation based on demographic data and physical factors for each municipality in the state. Those regulations were also required to address the court’s determination that there was a statewide need of 115,000 affordable new units and that an allocation was to be assigned to each municipality to address that need based on projected housing and job growth.

In order to allow for municipalities to address this obligation the end of the Round 3 cycle was extended from 2014 to 2018. In addition, COAH adopted revised regulations on June 2, 2008 which called for municipalities to create one affordable unit among every five housing units to be built between 2004 and 2018 as well as one affordable unit for every 16 jobs that were expected to be created during the 15 year time frame as per N.J.A.C. 5:97 based on COAH’s projections.

COAH’s revised third round methodology continues to include a rehabilitation share, the remaining obligation from COAH’s two prior rounds and the current round growth share obligation. COAH has published the municipal affordable housing allocations N.J.A.C. 5:97, Appendices B, C and F which describe the Township’s three-part affordable housing as follows:

Rehabilitation share	15 units
Prior Round obligation (1987-1999)	308 units
Growth share obligation (2004-2018)	34 units

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As stated above COAH's Third Round certification period was extended to December 31, 2018. Annual monitoring reports must be submitted to COAH based on projects contained in the Fair Share Plan. In addition, COAH will conduct bi-annual monitoring reviews to assure that municipalities are making proportional progress in creating the required number of affordable units during the plan period. If COAH determines that a municipality is not performing based on a shortfall of 10% or more of its pro-rated obligation or if there is no longer a realistic opportunity for an affordable housing project to be developed, COAH may require the municipality to prepare a revised plan to address the deficiency.

AFFORDABLE HOUSING

Affordable housing is defined as a dwelling, either for sale or rent that is within the means of individuals or households of low or moderate income in their housing region. Greenwich Township is in COAH's Region 5 which includes Burlington, Camden and Gloucester Counties. Moderate-income households are those earning between 50% and 80% of the regional median income, or up to $59,440 a year in 2008 for a four-person household. Low-income households are those with annual incomes that are between 50% and 30% of the regional median income, or up to $37,150 a year in 2008 for a four-person household. In this round, COAH has also included a very low-income category, which is defined to include those earning 30% or less of median household income within the housing region. Providing housing for very low-income households entitles a municipality to an additional bonus under certain conditions. Very low-income households are those earning an amount equal to $22,290 or less per year in 2008 for a household of four.

COAH requires that the maximum rent be affordable to households that earn no more than 60% of the median income for the region. The average rent must be affordable to households earning no more than 52% of median income and at least 10% of rental units must be affordable to households earning no more than 35% of median income. The maximum sales price for affordable units must be affordable to households that earn no more than 70% of the median income. The average sale unit must be affordable to a household that earns no more than 55% of the median income.

As discussed in detail below, Greenwich Township proposes to address a portion of its Third Round affordable housing obligation with affordable sale units. Approximate affordable sale prices[3] are shown below:

Household Income Level	One-Bedroom Unit Price	Two-Bedroom Unit Price	Three-Bedroom Unit Price
Moderate Income @ 70%	$87,767	$105,320	$121,703
Low Income @ 50%	$62,691	$75,229	$86,931

Source: COAH 2008 Regional Income Limits; *NJAC* 5:97 et seq. and *NJAC* 5:80-26 et seq.

[3] Actual affordable sale prices are calculated based on a number of varying assumptions that include mortgage interest rates, property taxes, homeowner insurance and private mortgage insurance, and condominium or homeowner association dues.

The Township will also provide affordable rental housing. Although potential rents have yet to be set, typical gross affordable rents in 2008 for moderate income, low income and very low income households are listed below by the number of bedrooms in an apartment:

Household Income Level	One-Bedroom Unit Rent	Two-Bedroom Unit Rent	Three-Bedroom Unit Rent
Moderate Income @ 60%	$836	$1,003	$1,159
Low Income @ 45%	$641	$769	$889
Very Low Income @ 30%	$418	$502	$580

Source: COAH 2008 Regional Income Limits; *NJAC* 5:97 et seq. and *NJAC* 5:80-26 et seq.

HOUSING ELEMENT/FAIR SHARE PLAN REQUIREMENTS

In accordance with the MLUL, a municipal Master Plan must include a Housing Element as a prerequisite for the adoption of zoning ordinance provisions within the municipality. The MLUL requires that a municipality's 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.

The Housing Element/Fair Share Plan must be adopted by the municipal Planning Board at a public hearing. To initiate COAH's protective jurisdiction, the Housing Element/Fair Share Plan must also be endorsed by the municipal governing body and formally submitted along with a resolution petitioning for substantive certification from COAH.

The Fair Housing Act requires that the Housing Element include a series of analyses and projections:

1. 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.

2. A projection of the municipality's housing stock, including the probable future construction of low and moderate income housing, for the next ten (10) years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development, and probable residential development trends.

3. An analysis of the municipality's demographic characteristics, including, but not necessarily limited to, household size, income level, and age.

4. An analysis of the existing and probable future employment characteristics of the municipality.

5. A determination of the municipality's present and prospective fair share of low and moderate income housing and its capacity to accommodate its present and

prospective housing needs, including its fair share of low and moderate income housing.

6. A consideration of the lands 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.

In addition, pursuant to COAH's current regulations (*NJAC* 5:97-3.2), the Housing Element/Fair Share Plan must address the entire Third Round cumulative (1987 – 2018) affordable housing obligation consisting of the rehabilitation share, any remaining balance of the Prior Round obligation, and the projected Growth Share of in accordance with COAH's regulations and the following supporting documentation:

The following section addresses the Fair Housing Act criteria (N.J.S.A. 52:27D-310) which defines the Housing Element:

Criteria #1. Inventory of Township's Housing Stock

COAH permits a municipality to utilize census data and other statistics compiled by Federal and State agencies to address this first statutory criterion of the Housing Element. This required data is presented in the following tables:

<u>Occupancy and Age Characteristics of Housing Stock</u>

According to the 2000 Census there were 1,944 housing units in Greenwich Township. The following tables describe the occupancy and tenure characteristics of the Township's housing stock:

TABLE 1 A		
Housing Occupancy		
Factor	**# of Units**	**% of Units**
Total Housing Units	1,944	100.0%
Occupied Housing Units	1,866	96.0%
Vacant Housing Units	78	4.8%

TABLE 1 B		
Tenure Characteristics		
Factor	**# of Units**	**% of Units**
Owner-occupied units	1,593	85.4%
Renter-occupied units	273	14.6%
Homeowner vacancy rate		
Rental vacancy rate		
Average household size: 2.61 persons		

The age of a community's housing stock is considered as a means of determining condition or the need for rehabilitation. The Township's housing stock is relatively young in that approximately 72% of the total stock as per the 2000 census was constructed since 1970 and approximately 52% of the total stock was constructed since 1980. The housing stock consists primarily of single-family, detached dwellings.

TABLE 2		
Age of Housing Stock		
Time Frame	**# of Units**	**% of Units**
1990-2000	689	37.0%
1980-1989	326	17.5%
1970-1979	321	17.2%
Prior to 1969	530	28.4%
TOTAL	**1,866**	**100.0%**

Source: 2000 Census

Condition of Housing Stock

In addition to age, COAH utilizes a number of factors, which are collected through the Census to determine housing conditions. These factors are being built prior to 1950, sub-standardness and overcrowding. The former term is defined by a unit lacking plumbing facilities or kitchen facilities, while a unit having more than one person per room defines the latter term. In the absence of a Township-wide housing study to determine physical conditions of the housing stock, these factors are considered to be an acceptable measurement of condition.

According to the 2000 Census there were 11 units in the Township lacking plumbing facilities, 0 units lacking kitchen facilities and 9 units were overcrowded. It should be noted that the total number of substandard and over-crowded units represents only 1% of the total housing stock in the Township.

Purchase or Rental Value

The following tables describe the value of owner- and renter-occupied units in the Township:

TABLE 3		
Value of Specified Owner-occupied Units		
Value Range	**# of Units**	**% of Total**
Less than $50,000	0	0.0%
$50,000-99,999	475	31.3%
$100,000-149,999	849	55.9%
$150,000-199,999	140	9.8%
$200,000-299,999	45	3.0%
$300,000-499,999	0	0.0%
$500,000-999,999	0	0.0%
$1,000,000 or more	0	0.0%
TOTAL	**1,518**	**100.0%**
MEDIAN VALUE	**$114,400**	

Source: 2000 Census of Population & Housing

Table 4 describes the distribution of rents in the Township as of the last census.

TABLE 4		
Value of Specified Renter-occupied Units		
Monthly Cash Rent	**# of Units**	**% of Total**
No Cash Rent	39	14.4%
$1 – 199	4	1.5%
$200 – 299	0	0%
$300 – 499	7	2.6%
$500 – 749	95	35.2%
$750 – 999	82	30.4%
$1,000 – 1,499	43	15.9%
$1,500 or more	0	0.0%
TOTAL	**270**	**100.0%**
MEDIAN GROSS RENT	**$778**	

Characteristics and Types of Housing Units

Over 90% of the pre-2000 housing stock consists of single-family, detached homes. This is the primary type of structure in the Township's housing stock. The following table is a description of the housing stock by structure type and number of units per structure. Another significant characteristic of the housing stock is that there are no developments currently consisting of 10 or more units which can provide affordable housing, especially for renter households.

TABLE 5		
Units in Structure	**# of Units**	**% of Units**
1, detached	1,771	91.1%
1, attached	48	2.5%
2	63	3.2%
3 – 4	42	2.2%
5 – 9	13	0.7%
10 – 19	0	0.0%
20 – 49	0	0.0%
50 or more	0	0.0%
Mobile Homes	7	0.4%
TOTAL	**1,944**	**100.0%**

Source: 2000 Census of Population & Housing

Number of Units Affordable to Low- and Moderate-Income Households

In determining affordability for low and moderate-income households, COAH requires applicant municipalities or developers to set rents so that these households do not pay more than 30% of gross income on rent, including utilities. For senior households this percentage is 40% of gross income. Individuals and families who pay more than 30% of monthly income on rent are eligible for State and Federal rent subsidies as long as their gross annual income does not exceed 80% of median income for a specific county. For age-restricted households the COAH affordability maximum is 40% of median income.

The 2000 Census data quantifies the number of owners and renters who are paying more than 30% of gross income on mortgages or rent, plus utilities, respectively, by income range. Income data from the 2000 Census was used to estimate the number of households who did or did not meet the COAH definition on affordability. This data is displayed in Tables 6 and 7.

TABLE 6		
Monthly Owner Cost as a Percentage of Household Income in 1999		
Percentage of Income	**# of Units**	**% of Units**
Less than 20%	780	51.4%
20.0 – 24.9%	185	12.2%
25.0 – 29.9%	193	12.7%
30.0 – 34.9%	134	8.8%
35.0% or more	211	13.9%
Not Computed	15	1.0%
TOTAL	**1,518**	**100.0%**

Source: 2000 Census of Population & Housing

The Census data also indicates that monthly owner costs in Greenwich Township are comparable to average Gloucester County monthly owner costs as the County monthly median payment is $1,273 while the Township monthly owner median payment is $1,159.

TABLE 7		
Gross Rent as a Percentage of Household Income in 1999		
Percentage of Income	**# of Units**	**% of Units**
0 – 14.9%	46	17.0%
15.0 – 19.9%	31	11.5%
20 – 24.9%	46	17.0%
25 – 29.9%	12	4.4%
30 – 34.9%	24	8.9
35.0% or more	66	24.4%
Not Computed	45	16.7%
TOTAL	270	100.0%
MEDIAN RENT (Township)	**$778**	
MEDIAN RENT (Gloucester County)	**$645**	

Source: 2000 Census of Population & Housing

Based on Federal and State standards, households paying in excess of 30% of income for housing are considered rent-burdened. Based on the above listed data, approximately 33% of the renter households or 90 families in the Township were so defined. This presents an indicator of demand for affordable rental housing.

<u>Substandard Housing Capable of Being Rehabilitated</u>

COAH has determined that Greenwich Township's Rehabilitation Component consists of 15 units, which is equivalent to approximately 1% of the total housing stock.

Rehabilitation Obligation

The rehabilitation obligation is defined by COAH as the number of deficient housing units occupied by low and moderate income households within a municipality (N.J.A.C. 5:97-1.4). COAH calculates this figure using indices such as overcrowding of units constructed prior to 1950, incomplete kitchen facilities, incomplete plumbing facilities and the estimated number of low and moderate income households in the municipality. COAH has calculated the Township's rehabilitation obligation to be 15 units. Please see Table 8, Calculation of the Rehabilitation Obligation, for additional information.

TABLE 8	
Calculation of the Rehabilitation Obligation	
	# of Units
Overcrowding of Units Constructed Prior to 1950	9
Incomplete Plumbing Facilities	+ 11
Incomplete Kitchen Facilities	+ 0
Low and Moderate Income Share	*0.737
Rehabilitation Share Credit	- 0
Rehabilitation Obligation	15 units

Source: Appendix B to N.J.A.C. 5:97

Criteria #2: Projection of the Township's Housing Stock, Including the Probable Future Construction of Low- and Moderate-Income Housing...

On May 6, 2008, COAH released municipal projections of housing growth for the period 2004 to 2018. COAH further instructed municipalities to utilize these projections in preparing the Housing Element and Fair Share Plan unless the municipality has reason to believe actual growth would be higher than the anticipated number of units to be built as estimated by COAH's consultants.

For Greenwich Township the projected number of housing units to be built over the 15-year period is 172 units as listed below:

Units in 2004	Units Allocated by 2018	Net Change: 2004 2018
1,953	2,125	172

Source: NJAC 5:97, Appendix F

In order to compare COAH's projection to Township data, the Township utilized the estimated number of units ~~in~~ that were in place as of 2000 (i.e., 1,944 units), certificates of occupancy and demolition data for the period 2000 through 2008, and pending development applications before the Planning Board and Zoning Board of Adjustment.

Based on the data listed in Tables 9 and 10 below 32 net units were added to the housing stock during the period January 1, 2000 through December 31, 2008 for a total of 1,976 units. An additional 20 to 50 units may be added to the housing stock over the next ten years based on a review of pending Planning Board and Zoning Board of Adjustment applications:

TABLE 9											
Certificates of Occupancy Permits Issued (1/1/1995 – 1/1/2004)											
Ten-year Historic Trend of Certificates of Occupancy and Demolition Permits											
	'95	**'96**	**'97**	**'98**	**'99**	**'00**	**'01**	**'02**	**'03**	**'04**	**Totals**
COs Issued	*	4	7	3	7	3	7	2	5	5	43
Demolitions	*	1	0	1	1	2	1	2	5	4	17
Net	*	3	7	2	6	1	6	0	0	1	26

Source: N.J. Department of Community Affairs
** Data is not available on NJDCA website for 1995.*

In addition, the Township has issued 26 C/Os from 2005 through 2008 as indicated in Table 10. However, recent economic conditions have resulted in a reduction of residential development activity. Therefore, the Township does not anticipate that growth will increase significantly over the next ten years due to what appears to be a protracted recession.

TABLE 10					
Certificates of Occupancy Permits Issued (1/1/2005 – 7/31/2008)					
	'05	**'06**	**'07**	**'08**	**Totals**
COs Issued	5	6	10	5	26
Demolitions	1	1	0	0	2
Net	4	5	10	5	24

Source: N.J. Department of Community Affairs (through July 31, 2008)

It further appears that the estimated number of 1,976 occupied units in the Township approximates the projection published by COAH for 2004. The construction data will be re-evaluated bi-annually during the plan period in accordance with COAH regulations.

Criteria #3. Analysis of the Township's Demographic Characteristics

Greenwich Township has experienced a decline in population since 1980. In that year the Township's population was 5,404 persons. In 1990, population declined by four percent to 5,188 persons. In 2000, the Township's population decreased by six percent to 4,879 persons.

By comparison, Gloucester County experienced population increases of 16%, 15% and 11%, respectively, for the last three census periods. Based on current economic conditions and growth that is occurring in nearby communities, it is anticipated that the Township's rate of growth will still lag behind Gloucester County in the next census.

The following table provides a comparison of the Township's population by age group between 1990 and 2000.

TABLE 9				
	1990		**2000**	
Age Range	**# of Persons**	**%**	**# of Persons**	**%**
Under 5	319	6.1%	281	5.8%
5 - 9	408	7.8%	270	5.5%
10 – 14	316	6.1%	313	6.4%
15 - 19	345	6.6%	374	7.7%
20 -24	298	5.7%	233	4.8%
25 – 34	834	16.1%	571	35.9%
35 -44	800	15.4%	789	16.2%
45 – 54	552	10.6%	710	14.6%
55 – 59	233	4.5%	250	5.1%
60 – 64	284	5.5	204	4.2%
60 – 74	531	10.2%	481	9.9%
75 – 84	218	4.2%	311	6.4%
85 and over	50	0.9%	92	1.9%
TOTALS		**100.0%**		**100.0%**

Sources: 1990 and 2000 Census of Population & Housing

Although the Township's total population decreased between 1990 and 2000, the "25 to 34" and "45 to 54" age cohorts increased significantly. There were also modest increases in the two highest senior-citizen age cohorts. The increase in the most senior age cohorts could contribute to increased demand for age-restricted housing.

A comparison of the racial composition of the Township to Gloucester County is described in Table 10 below. A review of the 2000 Census indicated that the relative presence of minorities is significantly lower than the County averages.

Table 10				
Racial Composition				
	Greenwich Township		**Gloucester County**	
Race alone or in combination with one or more other races	**# of Persons**	**%**	**# of Persons**	**%**
White	4,613	94.5%	238,991	84.7%
Black of African-American	162	3.3%	27,447	9.7%
American Indian and Alaska Native	5	0.01%	381	0.1%
Asian	33	0.7%	6,416	2.3%
Native Hawaiian and Other Pacific Islander	1	0.0%	73	0.0%
Some Other Race	13	0.3%	3,492	1.9%

Source: 2000 Census of Population & Housing

Table 11 provides a description of household types in the Township in comparison to Gloucester County households. The relative proportions of household characteristics are equivalent for each jurisdiction. About 25% of all family households had children of school age. Approximately 11% of such household were female-headed with children. And over a third of all households were headed by persons over age 65.

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These latter factors can contribute to the increased need for affordable housing.

Table 11				
Household Types				
	Greenwich Township		**Gloucester County**	
Type	**# of Persons**	**%**	**# of Persons**	**%**
Total Households	1,866	100.0%	99,275	100.00%
Family Households (Families)	1,393	74.7%	72,503	73.0%
- with own children under 18 years	584	31.3%	36,774	37.0%
Married-Couple Family	1,099	58.9%	56,611	59.0%
- with own children under 18 years	446	23.9%	28,284	28.5%
Female Householder, no husband present	203	10.9%	11,880	12.0%
- with own children under 18 years	95	3.1%	6,559	6.6%
Non-Family Households	473	25.3%	26,772	27.0%
- Householder Living Alone	413	22.1%	23,084	23.3%
- Household 65 years and over	228	12.2%	8,533	8.6%
Households with Individuals under 18 years	640	34.3%	40,354	40.6%
Households with Individuals 65 years and over	642	34.4%	22,837	23.0%
Average Household Size	2.61	---	2.79	---
Average Family Size	3.05	---	3.31	---

Source: 2000 Census of Population & Housing

The final demographic factor to be addressed is the income of Township residents. For comparison purposes census income categories for the Township were contrasted to Gloucester County income characteristics. As shown in Table 12 below Township individual per capita income was approximately 10% higher than Gloucester County while Township median household and family income was lower than the County averages. In addition, 3.6% of all individuals in the Township were below the poverty level in comparison to 6.2% for the County. Similarly, only 1.3% of the total number of families in the Township was below the poverty level, while 4.3% of all families in the County were in this condition.

TABLE 12		
Comparison of 2000 Township Income to Gloucester County Average		
Income Category	**Greenwich Township**	**Gloucester County**
Median Household Income	$53,651	$54,273
Median Family Income	$60,565	$62,482
Individual Per Capita Income	$24,971	$22,708
Persons in Poverty and % of Total Population	174 (3.6%)	15,395 (6.2%)
Families in Poverty and % of Total Population	19 (1.3%)	2,873 (4.3%)

Source: 2000 Census of Population & Housing

Criteria #4: Existing and Probable Future Employment Characteristics

In addition to providing demographic information on the Township, COAH also requires a municipality to provide information on the employment status of residents.

In order to provide such information the Township utilized data from the New Jersey Department of Labor. This data indicates that employment for residents in the labor force remained relatively stable in the mid- 2,000 jobs range for the 1990 to 2007 period. However, employment began increasing 2004 and reached a high of 2,893 jobs in 2006.

The unemployment rate has fluctuated between 3% and 4% for the 18-year period described in the following table with the exception of 2002 when the rate peaked to 5.0%. This anomaly may relate to the national recession after the “9-11” attacks which occurred the previous year.

TABLE 13				
Annual Average Labor Force Estimates for Greenwich Township				
Year	**Labor Force**	**Employment**	**Unemployment**	**Rate (%)**
1990	2,519	2,442	77	3.1%
1991	2,587	2,481	106	4.1%
1992	2,555	2,432	123	4.8%
1993	2,538	2,439	99	3.9%
1994	2,599	2,504	95	3.6%
1995	2,643	2,549	94	3.4%
1996	2,704	2,613	91	3.4%
1997	2,780	2,707	73	2.6%
1998	2,791	2,723	68	2.4%
1999	2,838	2,779	68	2.4%
2000	2,509	2,451	58	2.3%
2001	2,512	2,448	64	2.5%
2002	2,584	2,497	87	5.0%
2003	2,626	2,535	91	3.5%

2004	2,705	2,673	83	3.0%
2005	2,802	2,700	103	3.7%
2006	2,893	2,778	115	4.0%
2007	2,864	2,761	103	3.6%
2008	(no data available)			

Source: N. J. Department of Labor

The following data from the 2000 Census provides a description of the Greenwich Township workforce by Industry Category. The total number of jobs reported in the Census is 2,424, which is approximately 3% lower than the N.J. Department of Labor estimate of 2,509 residents employed in 2000. This discrepancy may be the result of the Census Bureau's use of a sampling methodology which differs from the State's methodology for calculating employment.

TABLE 14		
Classification of Employed Persons in Township by Census Category		
Industry	**# of Jobs**	**%**
Agriculture, forestry, fishing and hunting, and mining	16	4.7%
Construction	210	8.9%
Manufacturing	425	18%
Wholesale trade	187	8.0%
Retail trade	267	11.4%
Transportation and warehousing, and utilities	200	8.5%
Information	50	2.1%
Finance, insurance, real estate, and rental and leasing	75	3.2%
Professional, scientific, management, administrative, and waste management services	128	5.4%
Educational, health and social services	487	20.7%
Arts, entertainment, recreation, accommodation and food services	132	5.6%
Other services (except public administration)	81	3.4%
Public administration	92	3.9%
CLASS OF WORKER		
Private wage and salary workers	1,860	79.1%
Government workers	408	17.4%
Self-employed workers in own not incorporated business	82	3.5%
Unpaid family workers	0	0%

Source: 2000 Census of Population & Housing

The Census data indicates that the largest segment of resident employment is in the Educational, Health and Social Services category which represents approximately 21% of the workforce.

The second largest segment or 18% of the workforce is in the Manufacturing category. The Township also has a significant percentage of jobs in the manufacturing sector (i.e., 18%). The smallest segment of the workforce is the Information Technology (IT) and related occupations category with only 50 persons or 2% of the Township's workforce employed in that sector.

Finally, the Census data also indicates that 79% of the residents were salaried, private sector workers. The remaining 21% of the workforce were employed by governmental agencies or, to a lesser extent, were self employed.

Based on the revised growth share methodology COAH has estimated that there will be a net decrease of jobs in the Township during this period is as reflected in the following excerpt from Appendix F of the regulations:

Municipality	COAH Region	County	Employment in 2004	Employment Allocated in 2018	Net Change 2004-2018
Greenwich	5	Gloucester	1,138	1,128	- 10

Source: NJAC 5:97, Appendix F

The Township accepts COAH's estimate of employment growth for the calculating Township's growth share.

Criteria #5: Determination of Township's Present and Prospective Share of Low- and Moderate- Income Housing Need

As previously stated, COAH's revised regulations (N.J.A.C. 5:97, Appendix F) established a growth share allocation for all municipalities in the state which was based on creating one affordable unit among every five homes to be built and one unit for every 16 jobs that were to be created during 2004-2018. This methodology addresses the statutory criteria of "Present and Prospective Share" methodology that is referenced in the MLUL.

According to COAH's revised regulations the Township's growth share allocation is as follows:

Growth Share = (net change in units 2018-2004 -X .20) + (net change in job growth 2018-2004/16)

34 units = [(2,125-1953) X .20 + (1,138– 1,128) / 16*]

* Quotient can not be less than 0 jobs.

In addition, COAH has determined that the Township's Rehabilitation Share is 15 units while the Township's Prior Round Obligation is 308 units as per Appendix B and C at N.J.A.C. 5:97, of the regulations.

COAH further requires that the following factors be considered in the analysis of the municipality's capacity for accommodating the residential and non- residential growth projections:

- The availability of existing and planned infrastructure;
- The anticipated demand for the types of uses permitted by zoning based on present and anticipated future demographic characteristics;
- Anticipated land use patterns
- Municipal economic development policies
- Constraints on development including State and Federal regulations, land ownership patterns, presence of incompatible land uses or sites needing remediation and environmental constraints
- Existing or planned measures to address these constraints.

While these factors are not recited in the Municipal Land Use Law's definition of a Housing Element, the Township is submitting the 2007 Master Re-Examination Report as a response. The Report is attached in Appendix 'B.'

It should be noted that none of the affordable housing projects presented in the Fair Share Plan are adversely impacted by any known regulatory or environmental constraints.

Criteria #6: A Consideration of the Lands That Are Most Appropriate for the 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 Owned by Developers Who Have Expressed a Commitment to Provide Low- and Moderate-Income Housing.

The Township will utilize a number of programs to facilitate the construction of new affordable housing. These programs include:

- negotiating set-aside agreements with developers of inclusionary projects,
- adopting an Affordable Housing ordinance in accordance with COAH regulations,
- endorsing applications for funding by developers of 100% affordable projects,
- approving PILOT agreements for such projects,
- adopting a Development Fee Ordinance in accordance with COAH regulations, and
- implementing Market to Affordable Programs for up to ten home buyers and up to ten renter households by purchasing up to 20 privately owned units

Consideration of the Lands That Are Most Appropriate for the Construction of Low- and Moderate-Income Housing:

1. The Township has responded to a request from Gibbstown Senior Housing II, L.P., which is applying for Low Income Housing Tax Credits to build 66 affordable, age-restricted rental units at 400 Harmony Road (Block 169, Lot 20.03) this year. The partnership is affiliated with the Volunteers of America - Delaware Valley, which opened a 59 unit, HUD Section 202 development next to this parcel in 2000. The Township has approved a PILOT for the proposed development and anticipates granting site plan approval in April of this year.

2. The Township owns a vacant, two acre parcel, which is adjacent to a four acre, privately-owned parcel on Dorothy Avenue (Block 192, Lot 15). The Township may acquire this adjoining parcel and solicit proposals from qualified firms to develop a 24 unit, HUD Section 811 supportive housing development

3. The Township has also identified 13 properties through the Gloucester County Multiple Listing Service (MLS) that may be the initial source of properties for the two proposed Market to Affordable programs. The list price range for these properties is $144,000 to $199,999.

FAIR SHARE PLAN

Greenwich Township is requesting substantive certification of its Housing Element and Fair Share Plan under COAH's regulations (N.J.A.C.5:97). According to these regulations the Township's Fair Share Plan obligation must address the Rehabilitation Share, the Prior Round Obligation for 1987-1999 and the Growth Share Obligation for 2000 to 2018. The Fair Share Plan for Round #3 is as follows:

	# of Units
Rehabilitation Component	15
Prior Rounds' Obligation	+ 308
Growth Share Obligation	+ 34
Total Round #3 Fair Share Obligation	= 357

Discussion on Addressing Rehabilitation Share

The Township will address the 15 unit Rehabilitation Share requirement by initiating a municipal Rehabilitation Program in 2009 to provide funding to both owner- and renter – occupied units for the replacement of defective or substandard major systems.

Funding for the Rehabilitation Program will be provided by the Gloucester County Home Improvement Program for low-income owners, developer fee contributions as well as State and Federal grants. The Township will prepare a Rehabilitation Program manual based on the COAH model and submit it for approval prior to receipt of substantive certification

The Township shall claim future credits for units that receive $10,000 per unit or more in rehabilitation assistance for the repair or replacement of at least one major system.

Discussion of Addressing Prior Round Obligation

The Prior Round Obligation is a municipality's adjusted Second Round new construction component brought forward to the Third Round. COAH determined that the Township's revised Prior Round Obligation is 308 affordable units. COAH permits new construction credits and bonuses addressing a First or Second Round affordable housing obligation to be used to address the Prior Round Obligation.

In addition, COAH requires that the formulas for determining the maximum number of approved RCA units, the maximum number of age-restricted affordable units, and the minimum number of affordable rental units be recalculated using Third Round numbers as shown below in accordance with N.J.A.C. 5:97-3.10:

- Maximum Prior Round Age-restricted Cap [5:97-3.10 (c) (1)]:
  0.25 [(prior round recalculated + rehabilitation share) – rehabilitation credits - prior cycle credits) =

  0.25 [(308+15)-0-0–)] = **80 units**, rounded down

- Minimum Prior Round Rental Component [5:97-3.10 (b) (1)]:

  0.25 (prior round recalculated – prior cycle credits – 20% cap – 1000 unit cap –) =

  0.25 (308-0-0-0-0) = **77 units**

  - ✓ A prior round rental unit available to the general public receives one rental bonus;
  - ✓ A prior round age-restricted rental unit receives a 0.33 rental bonus, but no more than 50 percent of the prior round rental component shall receive a bonus for age-restricted units; and
  - ✓ No rental bonus is granted in excess of the prior round rental component.

- Maximum Prior Round Rental Bonus [5:97-3.5 (a) and (b)]:

  "a. A municipality may receive two units of credit for each rental unit addressing its prior round rental obligation, provided the unit was or will be created and occupied in the municipality or received preliminary or final approval, on or after December 15, 1986, is not age-restricted and has controls on affordability for at least 30 years. No rental bonuses shall be granted for rental units in excess of the prior round rental obligation."

  "(b) A municipality may receive 1.33 units of credit for each age-restricted rental unit addressing its prior round rental obligation, provided the unit was or will be created and occupied in the municipality or received preliminary or final approval, on or after December 15, 1986, and has controls on affordability for at least 30 years. No rental bonuses shall be granted for age-restricted rental units in excess of 50 percent of the prior round rental obligation.

As summarized in Table 16 below, the Township will address part of the 308-unit Prior Round obligation with the age-restricted Harmony House (a 59 unit, HUD Section 202 development opened in 2000) and with "Gibbstown Consumer Home." This is a HUD Section 811 three bedroom group home, which was developed by Community Enterprises Corporation in 1994. The Township is also requesting rental bonuses for these two projects.

In addition, the Township is proposing two rental projects to be developed by 2018.

1. a HUD Section 811 development consisting of 14 supportive units (the last published maximum by HUD in 2008) on municipal and adjacent privately owned land to be acquired; and

2. a 102 unit family rental development on a site to be identified and to be funded with Low Income Housing Tax Credits:

TABLE 16			
Project/Credit Description	**Block/Lot**	**N.J.A.C. Citation**	**Units**
Harmony House 400 Harmony Road	169/20.02	5: 97-3.10 (c)(1)	59
Rental Bonus Credits on above listed project	---	5: 97-3.5 (b)	12
Proposed Gibbstown Senior Housing II, L.P. project	169/20.02	5: 97-3.5 (a)	21
Gibbstown Consumer Home 631 Pieta Place	243.01/4	5: 97-3.5 (a)	3
Rental Bonus Credits on above listed project	---	5: 97-3.5 (a)	3
Proposed HUD Section 811 Supportive Housing Development (14 units was maximum size development in FY2008 NOFA)	TBD	5: 97-3.5 (a)	14
Rental Bonus Credits on above listed project	---	5: 97-3.5 (a)	14
Proposed Family Rental Development funded by NJHMFA	TBD	5: 97-3.5 (a)	134
Rental Bonus Credits on above listed project	---	5: 97-3.5 (a)	48
TOTAL CREDITS			**308**

Discussion of Addressing Growth Share Obligation

Under COAH's revised regulations, N.J.A.C 5:97, the Township must create a Fair Share Plan which provides a realistic opportunity for the development of units required to address any outstanding Prior Round Obligation and the 2004-2018 Growth Share Obligation. The Township's Fair Share Plan proposes a number of such projects and regulatory mechanisms to address that combined obligation of 357 units.

Greenwich Township will address the 34-unit Municipal Growth Share projection using COAH's Third Round regulations at N.J.A.C. 5:97 et seq. The revised Third Round Growth Share formulas introduced a requirement that half of the units in the Third Round Growth Share obligation (NJAC5:97-3.9) was to be addressed with family units. The 2008 regulations also reduced the maximum percentage of age-restricted units that could be used to address a municipality's growth share obligation from 50% to 25%. COAH further required that municipalities set aside 10% of the total units in the Third Round Growth Share obligation for occupancy by Very Low Income households (i.e., households receiving no more than 30% of median income). That percentage was subsequently increased to 13% by Assembly bill A-500. The legislation also eliminated the use of RCAs as a means of addressing a municipality's Third Round Growth Share obligation.

The following is a summary of COAH's requirements for addressing the various components of the Township's Third Round Growth Share obligation as per N.J.A.C. 5:97 and Assembly bill A-500:

- <u>Minimum Third Round Family Obligation (NJAC 5:97-3.9)</u>
  .50 (Growth share obligation)
  .50 (34) = 17 units, rounded up

- <u>Maximum Third Round Senior Cap_(NJAC 5:97-3.10)</u>
  .25 (growth share obligation) =
  .25 (34) = 8 units, rounded down

- <u>Minimum Third Round Rental Component (NJAC 5:97-3.6)</u>

  .25 (growth share obligation) =
  .25 (34) = 9 units, rounded up

  - ✓ Rental bonuses only apply to rental units that exceed the Third Round rental component.
  - ✓ Age-restricted rental units are not eligible for rental bonuses to address the Third Round Growth Share.
  - ✓ Not more than 50 percent of the Third Round rental obligation may be met with age-restricted units.

  <u>Minimum Very Low Income Component (Assembly bill A-500)</u>

  .13 (Growth share obligation) =
  .13 (34) = **4** units

  - ✓ One for one bonuses apply to Very Low Income units, with the stipulation for rental projects only that bonuses apply to units in excess of 10% of the municipality's total obligation.

The Fair Share Plan consists of a narrative to describe each mechanism and a series of COAH forms which will be used to assess the plan for compliance with the revised regulations.

Project	COAH Mechanism	Units
Gibbstown Senior Housing II, L.P. (66 unit Low Income Housing Tax Credit development) 400 Harmony Road (Block 169, Lot 20.03)	Municipally sponsored & 100% Affordable	8
Township-sponsored Program to acquire and renovate units for occupancy by Low and Very Low Income Renter households	Market to Affordable Program	9
Township-sponsored Program to acquire and renovate units for occupancy by Low and Moderate Income Owner households	Market to Affordable Program	10
Rental Bonus based on 8 units from Harmony House + 9 Market to Affordable Program family rental units = 18 units (17 units – 9 required units = 8 credits)	Rental Bonus Units	8
Total Units in Growth Share		**35**
Growth Share Obligation		**- 34**
Potential Credit for Next Round		**1**

The Township will utilize the above-listed programs to address the various compliance components of the growth share obligation as follows:

Minimum Third Round Family Obligation (17 units) by:		
Project	**COAH Mechanism**	**Units**
Township-sponsored Program to acquire and renovate units for occupancy by Low and Very Low Income Renter households	Market to Affordable Program	9
Township-sponsored Program to acquire and renovate units for occupancy by Low and Moderate Income Owner households	Market to Affordable Program	10
Total Family Units		**19**

Maximum Third Round Senior Cap (8 units) by:	
Project	**Units**
Gibbstown Senior Housing II, L.P	8
Total Units	**8**

kernan Consulting Engineers

Minimum Third Round Rental Component (9 units) by:	
Project	**Units**
Gibbstown Senior Housing II, L.P	8
Township-sponsored Market to Affordable Program for Low and Very Low Income Renter households	10
Total Units	**18**

Minimum Very Low Income Component (4 units) by:	
Project	**Units**
Four of nine Township-sponsored Market to Affordable Program Rental Units	4
Total Units	**4**

APPENIDIX ‘A’

PETITION FOR SUBSTANTIVE CERTIFICATION

WORKSHEET ‘A’

PROJECT CHECKLISTS

APPENDIX 'B'

2007 MASTER PLAN

RE-EXAMINATION REPORT