

**AFFORDABLE HOUSING  
THIRD ROUND MIDPOINT REALISTIC OPPORTUNITY REVIEW  
TOWNSHIP OF HADDON  
CAMDEN COUNTY, NEW JERSEY**

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July 1, 2020

**PURPOSE**

The requirement for a midpoint realistic opportunity review derives from the Fair Housing Act (“FHA”) at N.J.S.A. 52:27D-313, which provides: “[t]he Council (Council on Affordable Housing or COAH) shall establish procedures for a realistic opportunity review at the midpoint of the certification period and shall provide for notice to the public.” COAH failed to adopt regulations or procedures for a midpoint realistic opportunity review, thus, the purpose and process of this midpoint realistic opportunity review has been generally set forth in municipal settlement agreements with Fair Share Housing Center (“FSHC”).

The purpose of the midpoint realistic opportunity review is for Haddon Township to provide a status report as to the Township’s implementation of its affordable housing compliance measures. Although the Township continues to negotiate a settlement with FSHC on the exact compliance measures for a portion of its Third Round compliance plan, the Township and FSHC have entered into a Memorandum of Understanding (“MOU”) dated March 29, 2019. Pending settlement discussions may change some of the proposed compliance measures initially contemplated in the MOU for the Third Round.

To facilitate the review process, the Township will post this Mid-Point Review Report on the Township website, submit a copy to FSHC, place on file a copy of this report for public inspection at the office of the Township Clerk or, if the municipal building is closed due to the pandemic, interested parties may request a copy be mailed. Lastly, the Township will provide newspaper notice of the availability of this report. The Township’s notice to the public of this Mid-Point Review Report will include a 30-day deadline for any interested party comments/requests for a court hearing to be submitted.

As reflected in the Township’s MOU with FSHC, Haddon Township’s Third Round Fair Share obligation is as follows:

- Third Round Rehabilitation Share: 34
- Prior Round 1987-1999 Obligation: 35
- Third Round 1999 – 2025 Gap and Prospective Obligation: 198

Haddon Township Rehabilitation Share –

To address its 34-unit Rehabilitation Share, pursuant to the MOU the Township will continue its participation in the Camden County owner-occupied rehabilitation program. The Township may also implement a local renter-occupied rehabilitation program.

Haddon Township Prior Round Obligation –

Haddon Township has fully satisfied its 35-unit Prior Round Obligation as updated from the MOU and as shown in the chart below:

<b>Haddon Township Compliance Mechanisms Prior Round Obligation: 35</b>	<b>Credits</b>	<b>Rental Bonuses</b>	<b>Total</b>
<b>100% Affordable Housing - Completed</b>			
Rohrer Towers II: 100 senior affordable rentals, Prior Cycle credits capped for settlement purposes	8	---	<b>8</b>
<b>Inclusionary Developments – Completed</b>			
Rose Hill, Albertson Village: 8 family affordable rentals	8	8	<b>16</b>
Fieldstone: 25 total family affordable rentals, 10 of 25	10	1	<b>11</b>
<b>TOTAL</b>	<b>26</b>	<b>9</b>	<b>35</b>

*Maximum Prior Round Seniors = 0.25(35) = 8.75, must round down = 8  
Minimum Prior Round Rentals = 0.25(35) = 8.75, must round up = 9*

As shown below, the Township has provided the following completed Third Round compliance mechanisms and is currently negotiating with FSHC on the balance of the Township's Third Round Plan.

<b>Haddon Township Third Round Compliance Mechanisms</b>	<b>Credits</b>	<b>Rental Bonuses</b>	<b>Total</b>
<b>Prior Round Surplus – Completed age-restricted Prior Cycle credits from Rohrer Towers II – 45 credits not counted for settlement purposes</b>	---	---	---
<b>100% Affordable – Completed</b>			
Coles Landing – 57 senior affordable rentals, Third Round age-restricted cap at 49	49	---	<b>49</b>
<b>Inclusionary Developments – Completed</b>			
Fieldstone – 25 family affordable rentals – 15 of 25	15	15	<b>30</b>
<b>Balance of Third Round Plan - TBD</b>			

## CONCLUSION

Haddon Township has fully satisfied its Prior Round fair share obligation and has addressed a portion of its Third Round fair share obligation with completed family and senior affordable rental units. The Township is currently negotiating with FSHC as to the balance of its Third Round compliance mechanisms. In the event the Court determines that a compliance site or mechanism no longer presents a realistic opportunity and should be replaced, then Haddon Township shall have the opportunity to correct any compliance deficiency.

Prepared by:

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