

Borough of Tenafly

MAYOR AND COUNCIL

RESOLUTION #R25-72

OFFERED BY: _____ C. Roglieri _____

SECONDED BY: _____ C. Park _____

At a Meeting of the Mayor and Council of the Borough of Tenafly, County of Bergen, State of New Jersey, held on January 21, 2025.

RESOLUTION OF THE BOROUGH OF TENAFLY, COUNTY OF BERGEN, STATE OF NEW JERSEY COMMITTING TO ROUND 4 PRESENT AND PROSPECTIVE NEED AFFORDABLE HOUSING OBLIGATIONS

WHEREAS, the Borough of Tenafly, County of Bergen, State of New Jersey (hereinafter, "Tenafly") has a demonstrated history of voluntary compliance with its constitutional affordable housing obligations; and

WHEREAS, on March 20, 2024, Governor Phil Murphy signed into law P.L. 2024, c.2, an Amendment to the 1985 Fair Housing Act (hereinafter "Amended FHA" or "Act"); and

WHEREAS, the Amended FHA requires the Department of Community Affairs ("DCA") to provide an estimate of the fair share affordable housing obligations of all municipalities on or before October 20, 2024 based upon the criteria on the Amended FHA; and

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

WHEREAS, the DCA Report calculates Tenafly's Round 4 (2025-2035) fair share affordable housing obligations as follows: a Present Need (Rehabilitation) Obligation of 68 and a Prospective Need (New Construction) Obligation of 297; and

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

WHEREAS, the Amended FHA gives municipalities the opportunity to propose a different fair share affordable housing obligation from those reported by the DCA on October 18, 2024 based upon the standards in Sections 6 and 7 of the Act; and

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

WHEREAS, COAH regulations authorize municipalities to secure an adjustment to their rehabilitation obligation through a Structural Conditions Survey (“windshield survey”) and also empower municipalities to secure vacant land adjustments, durational adjustments and other adjustments; and

WHEREAS, Tenafly has exercised its right to take advantage of that opportunity to propose a different rehabilitation obligation than that reported by the DCA by conducting a windshield survey; and

WHEREAS, based upon the windshield survey (attached to the Planner’s Report attached hereto as Exhibit A), Tenafly has established that its rehabilitation obligation is ten (10); and

WHEREAS, despite errors in the Land Capacity Allocation Factor as identified in the Planner’s Report attached as Exhibit A, Tenafly has accepted the Prospective Need Obligation of 297 as reported by the DCA in its October 18, 2024 Report

WHEREAS, the Amended FHA provides that: “the municipality’s determination of its fair share obligation shall have a presumption of validity, if established in accordance with sections 6 and 7” of the Act; and

WHEREAS, Tenafly’s calculation of need is entitled to a “presumption of validity” because it complies with Sections 6 and 7 of the Act and the October 18, 2024 DCA Report ; and

WHEREAS, in addition to setting forth its Round 4 fair share affordable housing obligations for the reasons summarized above, substantial activity has occurred and is ongoing that warrants the reservation of certain rights to avoid any claim that it has waived them; and

WHEREAS, for example, the New Jersey Institute of Local Government Attorneys (NJILGA) has expressed its support for proposed legislation (hereinafter “NJILGA Legislation”) would reduce Tenafly’s Round 4 Prospective Need to 61 and would give Tenafly “90 days from receipt of revised fair share obligations from the [DCA] to provide amended Housing Element and Fair Share Plans addressing the new number); and

WHEREAS, Tenafly supports the NJILGA Legislation and would have the right to reduce its Round 4 obligation in the event that the Legislature enacts the NJILGA Legislation; and

WHEREAS, similarly, a number of municipalities, led by the Borough of Montvale, have filed suit (MER-L-1778-24) (hereinafter “Montvale Litigation”) challenging the validity of the Act and other aspects deriving from the Act, including, without limitation, Directive 14-24, issued by the Acting Director of the Administrative Office of the Courts (hereinafter, respectively, “Director” and “AOC”), as further referenced below; and

WHEREAS, the process established by the Amended FHA creates an opportunity to object by interested parties opposing the obligations to which a municipality commits, thereby creating the potential for litigation over the obligations of the municipality; and

WHEREAS the court approved a vacant land adjustment (hereinafter, “VLA”) and a realistic development potential (hereinafter, “RDP”) for Tenafly in Round 3; and

WHEREAS, because there has been no material change in vacant land in Tenafly since the approval of its VLA and RDP, and because Tenafly provided a realistic opportunity for the satisfaction of its RDP approved by the Court in Round 3, Tenafly is entitled to a vacant land adjustment, in Round 4 and a minimal RDP in Round 4 that will be fully addressed and included in the HEFSP it submits by the June 30, 2025 deadline; and

WHEREAS, the Amended FHA requires municipalities to adopt a binding resolution no later than January 31, 2025 as to its obligations; and

WHEREAS, in light of the above, Tenafly finds that it is in its best interest to declare its obligations in accordance with this binding resolution in accordance with the Act; and

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

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

WHEREAS, Tenafly seeks a compliance certification with the Act and, therefore, directs its Affordable Housing Counsel to file a declaratory relief action within 48 hours of the adoption of this resolution.

NOW, THEREFORE, BE IT RESOLVED on this 21st day of January, 2025 by the Governing Body of the Borough of Tenafly, County of Bergen, State of New Jersey, as follows:

1. The preamble of this resolution is incorporated into the operative clauses of this resolution as if set forth in full.

2. For the reasons set forth in this resolution and its attachments, Tenafly commits to a Round 4 Present Need (Rehabilitation) Obligation of ten (10) and a Round 4 Prospective Need (New Construction) obligation of 297, as set forth in the October 18, 2024 DCA Report and in the Exhibits to this Resolution, subject to all reservations of all rights, which specifically include, without limitation, the following:

- a) The right to a vacant land adjustment, durational adjustments, and all other applicable adjustments permitted in accordance with the Act and COAH regulations;
- b) The right to comply with the NJILGA Legislation if enacted, including the right to adjust its fair share obligations;
- c) The right to adjust its fair share obligation in the event of any future legislation that adjusts the fair share obligations that the DCA reported on October 18, 2024;
- d) The right to adjust its fair share obligations based upon any ruling in the Montvale Litigation or other litigation; and
- e) The right to adjust its fair share obligations in the event of a third party challenge to the fair share obligations and Tenafly's response thereto.

3. Tenafly hereby directs its Affordable Housing Counsel to file a declaratory judgment complaint in the appropriate venue within 48 hours after adoption of this resolution attaching this resolution.

4. Tenafly hereby authorizes its Affordable Housing Counsel to file this resolution with the Program or any other such entity as may be determined to be appropriate.

5. This resolution shall take effect immediately, according to law.

CERTIFICATION

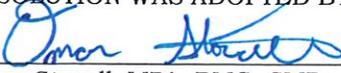
The undersigned, Municipal Clerk for the Borough of Tenafly, County of Bergen, State of New Jersey, hereby certifies the foregoing to be a true copy of a Resolution adopted by the Governing Body of the Borough of Tenafly on January 21, 2025.



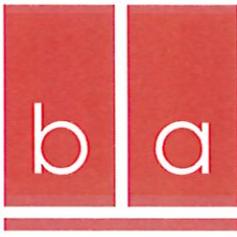
Omar Stovall, Municipal Clerk

	AYE	NAY	ABSTAIN	ABSENT		AYE	NAY	ABSTAIN	ABSENT
CORSAIR	✓				O'CONNOR	✓			
DAYTON	✓				PARK	✓			
MICHAELS	✓				ROGLIERI	✓			

THIS IS TO CERTIFY THAT THE ABOVE RESOLUTION WAS ADOPTED BY THE MAYOR AND COUNCIL ON JANUARY 21, 2025.



 Omar Stovall, MPA, RMC, CMR
 Borough Clerk



COMMUNITY PLANNING
LAND DEVELOPMENT AND DESIGN
LANDSCAPE ARCHITECTURE

B U R G I S
ASSOCIATES, INC.

Principals:
Joseph H. Burgis PP, AICP
Edward Snieckus, Jr. PP, LLA, ASLA
David Novak PP, AICP

MEMORANDUM

To: Edward J. Buzak, Esq.
Surenian, Edwards, Buzak & Nolan LLC

From: Joseph H. Burgis PP, AICP
David Novak PP, AICP

Subject: Borough of Tenafly
Bergen County, New Jersey
Resolution re: Present and Prospective Need Analysis

Date: January 17, 2025

BA#: 4168.04

Introduction

The following Present and Prospective Need Analysis has been prepared for the Borough of Tenafly in Bergen County, New Jersey.

By way of background, P.L.2024, c,2 was enacted on March 20, 2024. This legislation overhauled the Fair Housing Act (FHA) by abolishing the Council on Affordable Housing (COAH) and splitting its duties between the Department of Community Affairs (DCA) and the Administrative Office of the Courts (AOC).

The DCA was designated as the entity responsible for calculating the state's regional needs as well as each municipality's present and prospective fair share obligations. These municipal calculations, which were released on October 18, 2024, are advisory only. Each municipality is responsible for setting its own obligation utilizing a similar methodology by January 31, 2025 through the adoption of a binding resolution. The DCA has calculated Present Need of 68 affordable units and a Prospective Need of 297 affordable units for the Borough.

As set forth in the legislation, the methodology to calculate a municipality's prospective fair share obligation consists of three factors: the equalized nonresidential valuation factor; the income capacity factor; and the land capacity factor. These factors are described in greater detail herein.

The purpose of this analysis is to review the DCA's calculation of the Borough of Tenafly's Present Need Obligation and Prospective Need Obligation for the years 2025 to 2035. In summary, and as reflected by the Council Resolution regarding this matter, this analysis finds that the methodology utilized by the DCA to determine the Borough's obligations was appropriately conducted in accordance with the new legislation.

However, and as described in greater detail herein, this analysis uncovered errors with the data that was relied upon by the DCA to calculate the Borough's Prospective Need Obligation. This includes sites and acreage which should not have been included in the determination of the Borough's land capacity factor. Despite these errors, the Borough accepts the Prospective Need Obligation of 297 affordable units for the purposes of this process. Note that the Borough reserves the right to conduct a vacant land adjustment (VLA) to determine its realistic development potential (RDP) at a later date.

Finally, while the DCA calculated a Present Need Obligation of 68 affordable units, the Borough has conducted a Structural Needs Conditions Survey to more accurately identify its indigenous needs. This survey identified that 10 units are in need of rehabilitation.

Section 1: Present Need Obligation

The following section reviews the Borough's Present Need as calculated by the DCA. The DCA calculated a Present Need Obligation of 68 affordable units. The Borough conducted a Structural Conditions Survey to more accurately identify its indigenous needs. This survey identified that 10 units are in need of rehabilitation.

Background Information

As per the adopted legislation, a municipality's Present Need Obligation shall be determined "by estimating the deficient housing units occupied by low- and moderate-income households in the region, following a methodology similar to the methodology used to determine third round municipal present need, through the use of most recent datasets made available through the federal decennial census and the American Community Survey, including the Comprehensive Housing Affordability Strategy dataset thereof."

The "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background" workbook released by the DCA (herein referred to as the "DCA Workbook" or the "Workbook") noted that the Present Need calculations used three factors to calculate its present need: the number of housing units lacking complete kitchen facilities, the number of units lacking complete plumbing facilities, and the number of overcrowded units.

The analysis employed by DCA utilizes data from HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset, which has municipal-level data on the number and percentage of low- and moderate-income households from a special tabulation of the US Census's American Community Survey (ACS) data. For a full explanation of how this data was utilized, see the DCA Workbook.

The DCA determined by the Borough's Present Need number is 68 units.

Analysis

As per NJAC 5:93-5.2, "each municipality shall be provided with the Council's estimate for substandard units occupied by low and moderate income households. This estimate shall be the municipality's indigenous need, unless the municipality or an objector performs the Council's Structural Conditions Survey (see Appendix C, incorporated herein by reference). Where the municipality or objector performs the Structural Conditions Survey, the Council shall review the results of the data collected and shall modify the indigenous need if it determines a modification is warranted."

Appendix C to COAH's Round 2 rules (5:93) sets forth the guidelines for preparation of a Structural Conditions Survey. As set forth therein, the first step in the process is for the Construction Official (or their designee) to conduct an exterior survey to determine the number of substandard units in the municipality. The second step is to estimate the number of substandard units occupied by low and moderate income households. In order to come up with this estimate, Appendix C states that "the Council will rely on census information that is available from the Public Use Micro-Data Sample (PUMS)."

In regard to the first step, the Borough's Construction Official conducted a survey on December 11, 2024. As per that survey, the Construction Official observed 13 structures being in need of repair. See the survey and the explanatory memorandum attached to the end of this memorandum.

The next step is to estimate the number of those surveyed substandard units which are occupied by low and moderate income households. However, in calculating the Round 4 Present Need obligations, the DCA did not rely upon PUMS data for determining the percentage of substandard units occupied by low and moderate income households. Rather, the DCA relied upon HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset for this estimate. Separate percentages were calculated for overcrowded units and units lacking complete plumbing or kitchen facilities.

The entirety of the Present Need calculated for the Borough consisted of overcrowded units. The data employed by the DCA found that 92 units were overcrowded, and it was estimated by the DCA that 74.0% of these units were overcrowded by low- and moderate-income households.

When applying this same percentage to the units identified by the Structural Conditions survey, a total of ten units are in need of rehabilitation.

Section 2: Equalized Nonresidential Valuation Factor

The following section reviews the equalized nonresidential valuation factor calculated by the DCA. The Borough finds that the methodology utilized by the DCA to calculate its nonresidential valuation factor is acceptable. However, as per the Borough's tax assessor, the DCA incorrectly applied the 2024 equalization ratio to the 2023 tax listings. Despite this error, the Borough accepts the equalized nonresidential valuation factor calculated by the DCA.

Basis of Calculation

As per the adopted legislation, a municipality's equalized nonresidential valuation factor shall be determined as follows: "to determine this factor, the changes in nonresidential property valuations in the municipality, since the beginning of the round preceding the round being calculated, shall be calculated using data published by the Division of Local Government Services in the department. For the purposes of such, the beginning of the round of affordable housing obligations preceding the fourth round shall be the beginning of the gap period in 1999. The change in the municipality's nonresidential valuations shall be divided by the regional total change in the nonresidential valuations to determine the municipality's share of the regional change as the equalized nonresidential valuation factor."

Analysis of Calculation

The calculation conducted by the DCA determined that the Borough has a 0.55% share of the region's equalized nonresidential valuation.

Table 1 summarizes the DCA's calculation of the Borough's equalized nonresidential valuations from 1999 and 2023. As shown, the DCA calculated an equalized nonresidential valuation change of \$180,073,988 between 1999 and 2023. When divided by the region's total calculated nonresidential valuation change of \$32,549,128,394 for that same time period, this results in a regional share of 0.55%.

Table 1: DCA Equalized Nonresidential Valuation Calculation Summary

Year	Non-equalized Nonresidential Valuation	Equalization Ratio	Equalized Nonresidential Valuation
1999	\$125,173,500	0.8813	\$142,032,792
2023	\$ 244,640,100	0.7595	\$322,106,781
<i>Difference</i>			<i>\$180,073,989</i>

Source: DCA Fair Share Housing Obligations for 2025-2035 (Fourth Round) Workbook

The Borough has reviewed the methodology and data utilized by the DCA for this calculation. While the methodology employed by the DCA is appropriate, the Borough finds that the 2023 equalization ratio employed by the DCA is inaccurate. As per the Borough Tax Assessor, the correct 2023 equalization ratio is .8039 (as opposed to 0.7595).

Irrespective of this error, the Borough accepts the DCA’s equalized nonresidential valuation factor calculation of 0.55% for the purposes of this process.

Section 3: Income Capacity Factor

The following section reviews the income capacity factor calculated by the DCA. It finds that the data and methodology utilized by the DCA relating to the Borough’s income capacity factor are both acceptable.

Basis of Calculation

As per the adopted legislation, a municipality’s income capacity factor shall be determined by calculating the average of the following measures: “The municipal share of the regional sum of the differences between the median municipal household income, according to the most recent American Community Survey Five-Year Estimates, and an income floor of \$100 below the lowest median household income in the region; and the municipal share of the regional sum of the differences between the median municipal household incomes and an income floor of \$100 below the lowest median household income in the region, weighted by the number of the households in the municipality.”

Analysis of Calculation

The calculation conducted by the DCA determined that the Borough has a 2.11% share of the region’s income capacity factor. Table 2 summarizes the methodology utilized by the DCA to determine this share. The Borough has reviewed the data and the methodology utilized by the DCA for this calculation and finds both to be acceptable.

Table 2: Income Capacity Factor

Number of Households	Median household income in the past 12 months (in 2022 inflation-adjusted dollars)*	\$100 Below Regional Median HH Income Floor	Diff. from Median Household Income Floor with Household Weight	HH Weighted Income Difference % of Region Total	Diff from Median Household Income Floor	Income Difference % of Region Total	Income Capacity Factor
5,076	\$207,652	\$51,992	\$790,103,160	2.4%	\$155,660	1.9%	2.11%

Section 4: Land Capacity Factor

The following section reviews the land capacity factor calculated by the DCA. The Borough finds that the methodology utilized by the DCA to calculate its land capacity factor is acceptable. However, an analysis of the lands identified by the DCA as being “developable” includes several errors. In summary, these errors regard undeveloped segments of developed properties that were identified as developable; undeveloped segments of medians and rights-of-way; and preserved open spaces or otherwise encumbered lots that are not available for development.

Despite these errors, the Borough accepts the land capacity factor calculated by the DCA.

Basis of Calculation

As per the adopted legislation, a municipality's land capacity factor shall be determined by: "estimating the area of developable land in the municipality's boundaries, and regional boundaries, that may accommodate development through the use of the 'land use / land cover data' most recently published by the Department of Environmental Protection, data from the American Community Survey and Comprehensive Housing Affordability Strategy dataset thereof, MOD-IV Property Tax List data from the Division of Taxation in the Department of the Treasury, and construction permit data from the Department of Community Affairs and weighing such land based on the planning area type in which such land is located. After the weighing factors are applied, the sum of the total developable land area that may accommodate development in the municipality and in the region shall be determined. The municipality's share of its region's developable land shall be its land capacity factor. Developable land that may accommodate development shall be weighted based on the planning area type in which such land is located."

The legislation identifies the primary data sources and weighing factors to utilize in calculating a municipality's land capacity factor. However, unlike the equalized nonresidential valuation factor and the income capacity factor, the legislation did not establish a delineated process to combine the aforementioned data sources into one comprehensive and coherent formula.

The DCA subsequently released a workbook entitled "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background" (herein referred to as the "DCA Workbook" or the "Workbook") which established that department's interpretation on how to calculate the land capacity factor. In summary, that workbook identified the following steps:

1. First, the DCA divided the weighting regions established by the legislation by municipality.
2. Next, land use/land cover areas were used to identify vacant, developable lands. The workbook identifies the codes and descriptions of the land use/land cover data used in this process. In short, they include: cropland and pastureland; orchards/vineyards/nurseries/horticultural areas; deciduous forest areas; coniferous forest areas; plantations; mixed forest areas; old field areas; phragmites dominate old field areas; deciduous brush/shrubland; coniferous brush/shrubland; mixed deciduous/coniferous brush/shrubland; severe burned upland vegetation; and undifferentiated barren lands.
3. These initial vacant, developable lands were then refined to remove rights-of-way as well as developed properties. For the latter, the DCA utilized MOD-IV tax data and selected underlying tax parcels with property class codes for residential, commercial, industrial, apartment, railroad, and school.
4. Construction permit data was then analyzed to capture more recent development activities that may not have otherwise been reflected by the land use/land cover data or MOD-IV tax data.

5. Other limiting factors were utilized to remove initial vacant, developable lands. These include: open space, preserved farmland, category 1 waterways and wetlands (and associated buffers based on special area restrictions), steep slopes exceeding 15 percent, and open waters.
6. Due to limitations resulting from inconsistencies between data sources, the resulting mapping included instances of small land areas caused by an incongruous alignment of geospatial layers. To eliminate these "slivers" of leftover land, the DCA eliminated any feature part with an area of less than 2,500 square feet. This presumed that a 25' by 100' foot area could be a developable property.
7. Finally, the resulting land area for each municipality was summed with the land areas for all other municipalities within each housing region to then determine the municipal percentage of land capacity for the housing region.

Analysis of Calculation

The calculation conducted by the DCA determined that the Borough has 10.796 acres of developable land which accounts for 0.55% share of the region's developable land. Overall, the Borough finds the general methodology utilized by the DCA to calculate its land capacity factor acceptable. However, an analysis of the DCA's resultant mapping discovered the following:

1. Several of the lands identified as "developable" by the DCA represent slivers which "are considered artifacts of error that are common when overlaying polygons and vectors from non-coincident data sources." The DCA initially tried to eliminate these slivers by deleting any feature parts with an area of less than 2,500 square feet. However, several of these artifacts remain. They are typically located on properties which are preserved open space.
2. Other lands identified as "developable" by the DCA are located on properties with development. To eliminate "developable" lands on developable properties, the DCA had removed any lands where the underlying tax parcels had property class codes for residential, commercial, industrial, apartments, railroad, and school. However, the property classifications identified by the DCA failed to account for houses of worship and properties developed with nonprofit facilities.
3. Some lands identified as "developable" by the DCA are located along highway medians as well as within a right-of-way.

Despite these errors, the Borough accepts the land capacity factor calculated by the DCA for the purposes of this process. Irrespective of the land capacity factor analysis, the Borough reserves the right to conduct a vacant land adjustment (VLA) to determine its realistic development potential (RDP) at a later date.

Section 5: Conclusions

This analysis does not find fault with the methodology utilized by DCA in determining municipal affordable housing obligations. However, the analysis did uncover data that was relied upon by the DCA which incorrectly includes sites and acreage which should not have been included in the determination of the Borough's Prospective Need Obligation. Furthermore, as noted by the Borough's tax assessor, the equalization ratio utilized by the DCA to calculate the Borough's 2023 equalized nonresidential valuation was incorrect.

Nevertheless, the Borough accepts the Prospective Need Obligation of 297 affordable units calculated by the DCA. Note that the Borough reserves the right to conduct a vacant land adjustment (VLA) to determine its realistic development potential (RDP) at a later date.

Finally, pursuant to a Structural Conditions Survey conducted by the Borough, its Present Need Obligation should be 10 units.



David Novak, AICP, PP
Professional Planner #6269

EXTERIOR HOUSING SURVEY

MUNICIPALITY		COUNTY		DATE				
TRAVEL		BESS		12-1-2024				
MAJOR SYSTEMS				MINOR SYSTEMS				
One major system is required to indicate that the structure is in need of repair				Two minor systems are required to indicate that the structure is in need of repair				
Street Address	Block/Lot	Number of Dwelling Units	Tenure of Units i.e. owner occupied/rental/mixed occupancy	Year Built	Weatherization		Fire Escape	Structure in Need of Repair (Mark "Yes" or "No")
					Foundation	Siding and Walls		
114 Hudson Ave	1501/4	1	VACANT	1924	/	/	/	Yes
17 Wright Place	210/2	1	VACANT	1928	/	/	/	Yes
289 Tenafly Road	901/47	2	VACANT	1911	/	/	/	Yes
12 DeMott Place	810/15	1	OWNER OCCUPIED	1928	/	/	/	Yes
105 Westwilt Ave	412/19	1	VACANT	1948	/	/	/	Yes
13 Moller St	804/7	1	OWNER OCCUPIED	1926	/	/	/	Yes
15 S Browning Ave	403/3	1	OWNER OCCUPIED	1950	/	/	/	Yes
448 Knickerbocker	210/26	1	OWNER OCCUPIED	1953	/	/	/	Yes
446 Tenafly Road	1801/18	1	OWNER OCCUPIED	1925	/	/	/	Yes
235 RiverEdge Rd	209/16	2	RENTAL	1918	/	/	/	Yes
533 Knickerbocker Rd	121/17	1	OWNER OCCUPIED	1903	/	/	/	Yes
I verify that I have conducted this exterior housing survey according to COAH criteria								
Signature:				Print Name and Title:				
				Page _____ of _____				

If Yes, Provide Details