

- Letter Brief of Respondent, NJ COAH in Support of Motion for
Remand

- Certification

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John Payne



State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
25 MARKET STREET
CN 112
TRENTON, NJ 08625-0112

E-Mail: mallow3il@law.dol.lps.state.nj.us

PETER VERNIERO
Attorney General

JAYNEE LAVECCHIA
*Assistant Attorney General
Director*

CHRISTINE TODD WHITMAN
Governor

(609) 292-9302

July 21, 1997

Emille R. Cox, Clerk
Superior Court of New Jersey
Appellate Division
R. J. Hughes Justice Complex
CN 006
Trenton, New Jersey 08625

Re: IN THE MATER OF THE PETITION FOR
SUBSTANTIVE CERTIFICATION OF THE HOUSING
ELEMENT AND FAIR SHARE PLAN OF THE
TOWNSHIP OF HILLSBOROUGH, SOMERSET COUNTY
DOCKET NO. A-5349-95-T1

Civil Action: Motion for Remand

Letter Brief of Respondent, New Jersey
Council on Affordable Housing in
Support of Motion for Remand

Dear Mr. Cox:

Please accept this letter brief pursuant to R. 2:6-2 (b)
on behalf of respondent New Jersey Council on Affordable Housing.

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PLAN OF THE TOWNSHIP OF HILLSBOROUGH CONTINUE
TO PROVIDE A REALISTIC OPPORTUNITY FOR



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52:27D-314 AND SO THAT THE COUNCIL MAY TAKE
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PROCEDURAL HISTORY AND STATEMENT OF FACTS*

In this Mount Laurel case, see Burlington City, N. A.A.C.P. v. Mount Laurel, 67 N.J. 151 (1975) (Mount Laurel I), and Southern Burlington County N.A.A.C.P. v. Mount Laurel, 92 N.J. 158 (1983) (Mount Laurel II), appellant New Jersey Future, an environmental advocacy group, has challenged the decision of the New Jersey Council on Affordable Housing ("Council" or "COAH") dated April 3, 1996 granting substantive certification (Aa**11 to Aa26; Aa40 to Aa76) pursuant to the standards of the Fair Housing Act, N.J.S.A. 52:27D-301 to 321, to the housing element and fair share plan of the Township of Hillsborough ("Township" or "Hillsborough"). The Council's grant of substantive certification is based upon the Council's determination that the Hillsborough housing element and fair share plan provide a realistic opportunity for affordable housing within a six-year period of substantive certification. N.J.S.A. 52:27D-314.

Appellant's challenge to the Council's substantive

*These sections are here combined for the sake of clarity and to avoid repetition.

**Aa ___ refers to the appendix filed by appellant New Jersey future with its brief in this matter.

HRA ___ refers to the appendix filed by respondent Township of Hillsborough with its brief in this matter.

certification decision centers on a Planned Adult Community/Health Care Facility ("PAC/HCF") site, an approximately 740 acre parcel of land (Aa107) upon which 3,000 units of primarily age restricted housing is planned to be built, of which 15 percent or 450 units are planned to be affordable units. Of the 450 affordable units, 96 age restricted units and 40 family rental units must be built pursuant to the requirements of the substantive certification within the current six year period of substantive certification (Aa21, Aa22; Aa44 to Aa 47). However, the PAC/HCF site cannot be developed and the affordable units produced within the six years of the Council's certification without sewer services being brought to the site (Aa22). The recent June 27, 1997 decision by the Hillsborough Township Committee to not actively support the inclusion of the PAC/HCF site in the Somerset County wastewater management plan amendment (also known as a "208 plan" or "water quality management plan") and to overrule a Hillsborough Township Planning Board endorsement of the site's inclusion in the plan, brings into question whether sewer service will be expeditiously extended to the PAC/HCF site so that the affordable housing may be built.

Hillsborough's June 27 decision requires the Council to reassume jurisdiction over the Hillsborough fair share plan so that the Council may determine if the plan continues to provide a realistic opportunity for affordable housing. The Council will also upon remand determine what further action must be taken with regard to the plan if it concludes that the plan no longer provides

the requisite realistic opportunity. Therefore, the Council files this motion for remand.

Hillsborough petitioned for substantive certification of its housing element and fair share plan on February 27, 1995 (Aa77 to Aa125). The PAC/HCF site was included in the plan as the primary proposed site for affordable housing (Aa 106 to Aa 108, Aa 116 to Aa 120). The filed petition stated that the PAC/HCF site had received a general development plan approval from the Hillsborough Township Planning Board, which was memorialized on January 29, 1992 (Aa119). Further, the petition noted that "the entirety" of the PAC/HCF tract was included in the Somerset County amended wastewater management plan "which currently is being reviewed for approval by the New Jersey Department of Environmental Protection" (DEP). Id. Hillsborough stated that it expected an expedited approval by the DEP because "...the Somerset County Planning Board agreed to permit Hillsborough Township to separate its section of the County's overall 'Wastewater Management Plan' and to submit its own 'Hillsborough Township Wastewater Management Plan'" to the DEP. Id.

Because there was an objector to the Hillsborough petition for substantive certification, the Council conducted a mediation pursuant to N.J.S.A. 52:27D-315. A mediation report was issued on January 17, 1996 (Aa271 to Aa279). The mediation report stated that because the objection was filed, Hillsborough withdrew its request to the DEP for the water quality management plan amendment involving the PAC/HCF site and quoted Hillsborough's

reasons for the withdrawal: "...it was not 'appropriate to sponsor a Wastewater Management Plan amendment involving individual property owners where objections have been filed...'" Aa272. The mediation report also states that mediation had involved the fact that the PAC/HCF site was located predominantly in Planning Area 4, as designated in the State Development and Redevelopment Plan (SDRP), and that the objector claimed that for an inclusionary development to be built on the PAC/HCF site, the site needed designation as a "center" consistent with the policies of the SDRP. The report noted that Hillsborough had requested a waiver of the requirement that the site receive center designation and that the site met COAH's policies regarding the granting of a waiver from center designation (Aa276 to Aa278). The mediation report concluded that no substantial amendments were needed to the Hillsborough housing element and that there were no outstanding contested issues of fact requiring a referral to the Office of Administrative Law for resolution (Aa 279).

On February 27, 1996 Hillsborough and the developer of the PAC/HCF site, Hillsborough Alliance for Adult Living, L.P. ("the developer") signed an agreement with regard to the development of the PAC/HCF site (Aa40 to Aa49). The agreement set forth that the developer could build a maximum of 3,000 single family residential units on the PAC/HCF site, 15 percent of which would be set aside for affordable housing, and that 136 of the affordable units were to be built in the six year period of substantive certification (Aa44). The agreement contained a

statement that "substantive certification by COAH, and any obligation of the developer to proceed is premised upon the fact that sewers shall be made available to this site..."(Aa45). The agreement listed the following three reasons why the parties agreed that sewer would be provided to the site: (a) the site had received general development plan approval from Hillsborough prior to the adoption of the SDRP; (b) the site was included "in its entirety" in the Somerset County Wastewater Management Plan, "which has received preliminary comments by DEP and is presently being reviewed by Somerset County for resubmission to DEP by April 1996"; and (c) there were assurances by the Office of State Planning (OSP), which had reviewed the site, that the PAC/HCF site would be recommended for inclusion in Planning Area 2 during the OSP's next cross acceptance cycle(Aa45).

Because the approval of sewer service for the project was essential for development to begin and the affordable housing to be produced, the agreement provided that if the developer were not able to build the project and produce the required affordable units within the six year period of substantive certification the developer should notify Hillsborough prior to December 31, 1998 "so that alternative plans...may be instituted either by the developer and/or the Township" to provide the required affordable housing (Aa46). If circumstances beyond the control of the developer occurred which prevented the developer from building the affordable units within the six year period of substantive certification, the developer agreed to "reserve and convey to the Township up to ten

(10) acres of land with sewer availability" for the construction of 136 required units of affordable housing (Aa46, Aa47).

On March 4, 1996 a COAH compliance report recommending substantive certification to Hillsborough's housing element and fair share plan was issued (Aa27 to Aa57). Attached to the compliance report was the signed, mediated agreement between Hillsborough and the developer (Aa40 to Aa50). The March 4 compliance report gave extensive attention to the issue of whether the PAC/HCF site required designation as a center and concluded that COAH could waive center designation (Aa32 to Aa35). Material to COAH's decision with regard to the waiver of center designation was the fact that it determined that the PAC/HCF site "has water and sewer," in that the PAC/HCF tract was included in the Somerset County Wastewater Management Plan "which is under review by the New Jersey Department of Environmental Protection (DEP)." Aa33.

The March 4 compliance report was issued for a 14 day comment period. On March 15, 1996, appellant New Jersey Future wrote a letter of objection to the recommendation that substantive certification be granted by COAH to the Hillsborough fair share plan (Aa70 to Aa76). Rather, appellant requested COAH "to defer its decision on this plan" until (a) the State Planning Commission ("SPC") approved a planning area map amendment incorporating the PAC/HCF site into Planning Area 2, (b) the DEP amended its waste water management plan to include the PAC/HCF tract and (c) the SPC provided center designation for the PAC/HCF tract (Aa 72, Aa73).

COAH issued substantive certification to Hillsborough's

housing element and fair share plan on April 3, 1996 (Aa19 to Aa26; Aa40 to Aa76). An executive summary accompanying the proposed substantive certification resolution (Aa15 to Aa17) stated that development of the PAC/HCF site "is contingent on the site being included in a 208 plan amendment." The summary updated the Council as to the status of efforts to bring sewer to the site. A preliminary plan amendment including the PAC/HCF had been submitted to the DEP by the Somerset County Planning Board for review. The DEP responded with comments and the Somerset County Planning Board was currently working with an advisory committee to prepare a final document which would then be submitted within two months to the applicable municipalities and the Somerset County Board of Chosen Freeholders for review (Aa16). With regard to appellant's request to defer substantive certification, the summary cited an OSP regulation that "No municipality, county, regional or State agency should delay any decision making process due to a pending review of their plans by the Office of State Planning for consistency with the SDRP." N.J.A.C. 17:32-7.1(c).

In its April 13, 1996 resolution granting substantive certification to Hillsborough's housing element and fair share plan, the Council acknowledged that the development of the PAC/HCF project was contingent on the site being included in the water quality management plan amendment and further noted that the Somerset County Planning Board anticipated that a finalized water quality management plan would be refiled with DEP within two months of the date of substantive certification (Aa22). The resolution

required that "in the event of the PAC/HCF site is not approved for inclusion in the 208 plan amendment, Hillsborough shall be required to amend its housing element and fair share plan to address the 160 units [of affordable housing] in another matter;"...(Aa22). COAH conditioned its grant of substantive certification on the fact that Hillsborough Township report to COAH on the status of the water quality management plan amendment then pending at the DEP in six months from the date of the grant of substantive certification (Aa26). Also, the Council granted a waiver from its center designation requirements for the PAC/HCF site in Hillsborough for the reasons set forth in the March 4, 1996 Compliance Report, which was attached and incorporated into the grant of substantive certification (Aa25; Aa29 to Aa56).

On May 20, 1996 appellant filed a Notice of Appeal from Council's grant of substantive certification to Hillsborough's housing element and fair share plan (Aa1 to Aa10). In its brief on the merits filed on March 21, 1997, appellant claimed that at the time its brief was filed "there is no pending request at DEP for a wastewater management plan amendment" including the PAC/HCF site (Ab11 to Ab13 at Ab13). Hillsborough responded in its brief that "The status of the County Plan Amendment as it relates to the PAC/HCF site is the same at this writing as it was when substantive certification was granted." HRb46. However, in a footnote to this statement Hillsborough stated "...the Township Committee by resolution of 4/22/97...has declared that it will provide its opinion regarding inclusion of the site in the County Plan by June

10, 1997." HRb46.'

On April 8, 1997 John D. Middleton, Hillsborough Township Administrator, filed a letter with COAH in compliance with the six month reporting requirement included by COAH as a condition of substantive certification. See, Certification of Shirley M. Bishop, P.P., at Exhibit A. This letter was captioned "Twelve Month Status Report" and concerned the status of sewer services to the PAC/HCF tract. The letter stated that the Hillsborough Township Planning Board at its April 3, 1997 meeting passed a resolution requesting that the entire PAC/HCF tract be included in the Somerset County-Upper Raritan Watershed Wastewater Management Plan that was to be submitted to DEP. Bishop Certification at Exhibit A.

However, on June 27, 1997 Middleton filed another letter with the Council. See, Bishop Certification at Exhibit B. In that letter, Middleton stated that at its meeting of April 22, 1997 the Hillsborough Township Committee by resolution "reserved the right to endorse or not endorse" the Planning Board's April 3, 1997 recommendation. The letter further informed COAH that on June 11, 1997 the developer of the PAC/HCF site "independently petitioned DEP for inclusion of their lands" in the wastewater management plan. Because of the developer's petition, Middleton continued, the Hillsborough Township Committee "saw no reason to request the County to include" the PAC/HCF site in the wastewater management

*The Council has not filed a brief in this matter. Rather, on July 2, 1997 it made a motion for a thirty day extension of time in which it was stated that either a merits brief or this Motion for Remand would be filed by August 3, 1997.

ARGUMENT

THE COURT SHOULD ENTER AN ORDER REMANDING THIS MATTER TO THE JURISDICTION OF THE COUNCIL ON AFFORDABLE HOUSING SO THAT IT MAY DETERMINE WHETHER THE HOUSING ELEMENT AND FAIR SHARE PLAN OF THE TOWNSHIP OF HILLSBOROUGH CONTINUE TO PROVIDE A REALISTIC OPPORTUNITY FOR AFFORDABLE HOUSING PURSUANT TO N.J.S.A. 52:27D-314 AND SO THAT THE COUNCIL MAY TAKE WHAT ACTION IT DEEMS NECESSARY WITH REGARD TO THE HILLSBOROUGH PLAN.

The New Jersey Council on Affordable Housing has consistently been recognized by the New Jersey Supreme Court as having broad powers and wide discretion to resolve low and moderate income housing problems. Hills Dev. Co. v. Bernards Tp., 103 N.J. 1, 32 (1986); Holmdel Builders Ass'n v. Tp. of Holmdel, 121 N.J. 550, 574 (1990); Van Dalen v. Washington Township, 120 N.J. 234, 245 (1990). In Holmdel Builders Ass'n., supra, 121 N.J. 550, for example, the Supreme Court recognized the Council's broad authority over satisfaction of the fair share need and general affordable housing policy. As the Court noted:

It cannot be over stressed that the Legislature, through the FHA, intended to leave the specific methods of compliance with Mount Laurel in the hands of COAH and the municipalities, charging COAH with the singular responsibility for implementing the statute and developing the State's regulatory policy for affordable housing. [Id. at 576].

The Court further emphasized the breadth of COAH's authority, finding that COAH's authority comports "...with the complexity and sensitivity of the subject of affordable housing." Id. at 577.

In this matter, the Council's grant of substantive certification to Hillsborough's housing element and fair share plan represents the Council's judgment that the element and plan comport with the standards of the Fair Housing Act, provide a realistic opportunity for affordable housing and comport with the Council's regulations. N.J.S.A. 52:27D-314; N.J.A.C. 5:93-1 et seq. The Council's substantive certification decision was based upon the assumption that Hillsborough would continue to support the provision of sewer service to the PAC/HCF site (Aa22; Aa26), just as it had at the time of the filing of its petition (Aa119) and throughout the COAH mediation (Aa45 to Aa47) and certification (Aa 15 to Aa17) process. For that reason, Hillsborough was to report to the Council every six months as to the status of DEP's actions with regard to the water management quality management plan amendment containing the PAC/HCF site (Aa26). Further, the Council's resolution granting certification acknowledged that development of the affordable housing on the PAC/HCF site was conditioned on the approval of a water quality management plan amendment containing the PAC/HCF site. If the 208 plan amendment was not approved, Hillsborough would have to amend its element and plan to address its affordable housing obligation in another manner (Aa22).

The June 24, 1997 decision of the Hillsborough Township Committee to not request Somerset County to include the PAC/HCF site in its wastewater management plan and the Committee's decision to overrule the Hillsborough Township Planning Board's April 3,

1997 decision to recommend that the PAC/HCF site be included in the Somerset County plan materially undermine the assumptions and predicates upon which COAH granted substantive certification to Hillsborough's plan. Moreover, these decisions require the Council to reexamine its determination that Hillsborough's plan provides the realistic opportunity for affordable housing required by N.J.S.A. 52:27D-314.

Therefore, the Council by this Motion for Remand requests this Court to relinquish jurisdiction over this matter and return this case to the jurisdiction of the Council so that COAH may initiate procedures before it---through, for example, an Order to Show Cause issued to Hillsborough---to determine whether the Hillsborough plan continues to meet the standards for certification set out in the Fair Housing Act and COAH's rules. The Council may then take other appropriate actions it deems necessary relative to Hillsborough's fair share plan to assure that Hillsborough continues to meet its Mount Laurel responsibilities.

It is well settled that this Court has the discretion to remand an administrative action such as this for further agency proceedings, when such a remand would be in the interest of justice. Texter v. Human Services Dep't., 88 N.J. 376 (1982); Wilson v. Mountainside, 42 N.J. 426 (1984). See also R. 2:9-1(a). This requested remand is clearly in the interest of justice in that the "complexity and sensitivity of the subject of affordable housing" is at issue, as are the "specific methods" of Hillsborough's "method of compliance with Mount Laurel". Holmdel

Builders Ass'n., supra, 121 N.J. 576, 577. Therefore, the Council requests this Court to allow it to reassume jurisdiction over this matter and to transfer the matter back to the Council.

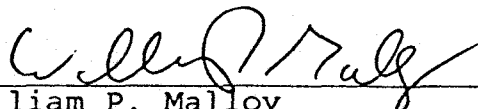
CONCLUSION

For all of the above stated reasons, this Court should grant this Motion for Remand and return jurisdiction over this matter to the New Jersey Council on Affordable Housing.

Respectfully submitted,

PETER VERNIERO
ATTORNEY GENERAL OF NEW JERSEY

By:


William P. Malloy
Deputy Attorney General

c: Edward Lloyd, Esq.
Frank Yurasko, Esq.
Ronald Shimanowitz, Esq.
Stephen Eisdorfer, Esq.
Peter Buchsbaum, Esq.
Edward Halpern, Esq.

PETER VERNIERO
ATTORNEY GENERAL OF NEW JERSEY
R. J. Hughes Justice Complex
CN 112 - 25 Market Street
Trenton, New Jersey 08625

By: William P. Malloy
Deputy Attorney General
(609) 292-9302

SUPERIOR COURT OF NEW JERSEY
APPELLATE DIVISION
DOCKET NO. A-5439-95TI

IN THE MATTER OF THE PETITION FOR) CERTIFICATION IN SUPPORT OF
SUBSTANTIVE CERTIFICATION OF THE) A NOTICE OF MOTION FOR
HOUSING ELEMENT AND FAIR SHARE) REMAND
PLAN OF THE TOWNSHIP OF)
HILLSBOROUGH, SOMERSET COUNTY)

Shirley M. Bishop, P.P., by way of certification states:

1. I am the Executive Director of the New Jersey Council on Affordable Housing.

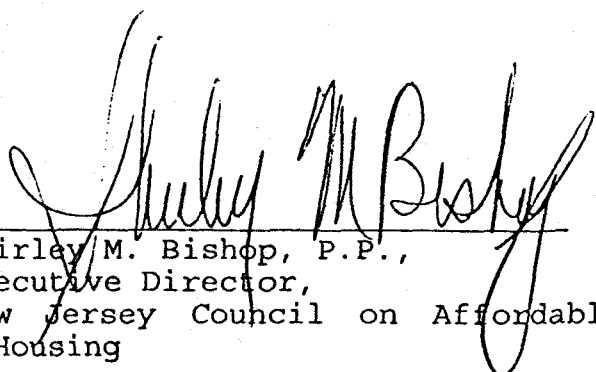
2. In my capacity as Executive Director I received a letter dated April 8, 1997 from John D. Middleton, Township Administrator, Township of Hillsborough, concerning the township's 12 month status report on the provision of sewer service to the PAC/HCF tract. A copy of this letter is attached as Exhibit A to this certification.

3. I have also received another letter from Mr. Middleton dated June 27, 1997 concerning Hillsborough's decisions with regard to the extension of sewer service to the PAC/HFC tract. This letter is attached as Exhibit B.

4. On July 9, 1997 I presented these two letters to the New Jersey Council on Affordable Housing at its regular monthly meeting in executive session. Based upon the letters, the Council

decided to seek a remand of this appeal, so that the Council may consider the effect of Hillsborough's recent decisions on the continuing viability of the fair share plan to which the Council granted substantive certification and so that the Council may take appropriate action with regard to Hillsborough's fair share plan.

5. I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.



Shirley M. Bishop, P.P.,
Executive Director,
New Jersey Council on Affordable
Housing

DATED: July 18, 1997



Township of Hillsborough

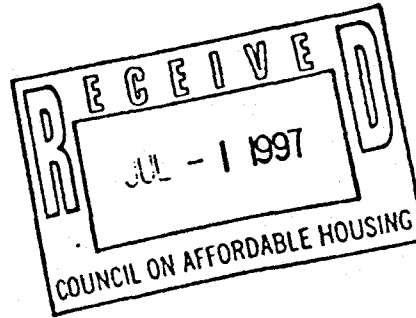


COUNTY OF SOMERSET
MUNICIPAL BUILDING
AMWELL ROAD
NESHANIC, NEW JERSEY 08853

(908) 369-4313

June 27, 1997

Ms. Shirley M. Bishop, P. P.
Executive Director
Council on Affordable Housing
CN 813
Trenton, N. J. 08625-0813



Dear Ms. Bishop,

As I indicated to you in my April, 8, 1997 status report, the Hillsborough Township Planning Board, at its April 3, 1997 meeting, passed a resolution requesting that the entire PAC/HCF tract be included in the Somerset County/Upper Raritan Watershed Wastewater Management Plan (WWMP). At their meeting of April 22, 1997, the Hillsborough Township Committee reserved the right to endorse or not endorse the Planning Board's recommendation. On June 11, 1997, the developer of the Greenbriar at the Village independently petitioned NJDEP for inclusion of their lands in the WWMP.

Since the developer has requested inclusion in the WWMP and has an application for preliminary subdivision approval before the Planning Board, the Hillsborough Township Committee saw no reason to request the County to include the Mill Lane area in the WWMP; therefore, at their meeting on June 24, 1997, they voted to overrule the Planning Board's recommendation. They believe the public processes followed by NJDEP and the Hillsborough Township Planning Board should be allowed to proceed to conclusion without being prejudged. When those processes are finished, the Hillsborough Township Committee will be required to take action, under NJDEP regulations, and they will.

If you need more information on this matter, please let me know.

Sincerely,

John D. Middleton
Township Administrator

Encl.

- cc: Hillsborough Township Committee
- Ed Halpern, Township Attorney, w/encl
- Frank Yurasko, Township Litigation Attorney, w/encl
- James A. Farber, Special Litigation Counsel

**RESOLUTION REGARDING THE STATUS OF THE PAC/HCF OVERLAY ZONE IN
THE MILL LANE AREA IN THE HILLSBOROUGH TOWNSHIP WASTEWATER
MANAGEMENT PLAN**

WHEREAS, on April 3, 1997, the Hillsborough Township Planning Board adopted a resolution recommending changes to the Hillsborough Township portion of the Somerset County/Upper Raritan Watershed Wastewater Management Plan; and

WHEREAS, by resolution of April 22, 1997 the Hillsborough Township Committee requested that the Somerset County Planning Board defer any action on the Hillsborough Township Planning Board resolution of April 3, 1997 until such time as the Hillsborough Township Committee has a chance to review and endorse it; and

WHEREAS, as part of that resolution, the Hillsborough Township Planning Board recommended including the PAC/HCF overlay zone in the Mill Lane area in the Hillsborough Township Wastewater Management Plan; and

WHEREAS, U. S. Homes and the Hillsborough Alliance for Assisted Living have applied for preliminary approval of a major subdivision in the Mill Lane area to be known as Greenbriar at the Village; and

WHEREAS, on June 11, 1997, the developer petitioned the New Jersey Department of Environmental Protection for inclusion of their lands in the Somerset County/Upper Raritan Watershed Wastewater Management Plan; and

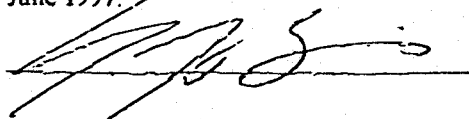
WHEREAS, both the Hillsborough Township Planning Board and the New Jersey Department of Environmental Protection have clearly defined public processes for reaching their decisions; and

WHEREAS, the Hillsborough Township Committee believes both processes should be allowed to proceed to conclusion.

NOW, THEREFORE, BE IT RESOLVED by the Township Committee of the Township of Hillsborough, County of Somerset, State of New Jersey, that the changes recommended by the Hillsborough Township Planning Board relative to the PAC/HCF zone are overruled and the PAC/HCF zone should not be included in the Hillsborough Township portion of the Somerset County/Upper Raritan Watershed Wastewater Management Plan.

I, Gregory J. Bonin, Hillsborough Township Clerk, hereby certify that the above resolution is a true and correct copy of a resolution adopted by the Township Committee of the Township of Hillsborough at a regular and duly convened meeting held on June 24, 1997.

In witness thereof I have set my hand and affixed the seal of the Township of Hillsborough this 25th day of June 1997.



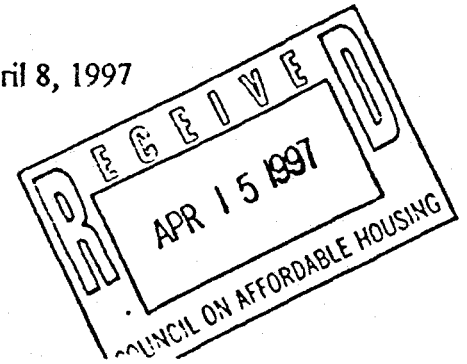


Township of Hillsborough

COUNTY OF SOMERSET
MUNICIPAL BUILDING
AMWELL ROAD
NESHANIC, NEW JERSEY 08853

TELEPHONE
(908) 369-4313

April 8, 1997



Ms. Shirley M. Bishop, P. P.
Executive Director
Council on Affordable Housing
CN 813
Trenton, N. J. 08625-0813

Re: Twelve month Status Report on Hillsborough Township's Substantive Certification

Dear Ms. Bishop,

As you are aware, satisfaction of Hillsborough Township's Fair Share Plan is dependent on DEP approval of the Somerset County/Upper Raritan Watershed Wastewater Management Plan, which includes the extension of the sewer area to the PAC/HCF tract. In November, 1996, the Township Committee requested that County and DEP review of the WWMP be deferred six months so that the Planning Board could review it and possibly modify it. That review has been completed and the Planning Board, at its April 3, 1996 meeting, passed a resolution requesting that the entire PAC/HCF tract be included in the WWMP.

In July, 1996, a developer, U. S. Homes Corporation, submitted an application for preliminary subdivision approval to the Hillsborough Township Planning Board. That application included the construction of the elements of our Fair Share Plan. In August, 1996, the application was withdrawn. In December, 1996, the application was resubmitted and is now being considered by the Planning Board.

If you need more information on this matter, please let me know.

Sincerely,

John D. Middleton
Township Administrator

cc: Hillsborough Township Committee
Ed Halpern, Township Attorney
Frank Scarantino, Township Engineer