

BOROUGH OF WATCHUNG

SOMERSET COUNTY, NEW JERSEY

AFFORDABLE HOUSING MIDPOINT REVIEW REPORT 2019 HOUSING ELEMENT & FAIR SHARE PLAN

JUNE 2020

Prepared by:



A handwritten signature in black ink, reading 'Marcia R. Shiffman', is written over a horizontal line.

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*The original of this document has been signed
and sealed in accordance with New Jersey Law.*

PURPOSE

Paragraph 19 of the Borough of Watchung's 2018 Settlement Agreement with Fair Share Housing Center ("FSHC") requires that the Borough comply with the statutory midpoint review requirements of the Fair Housing Act and specifically N.J.S.A. 52:27D-313, which states "...the Council shall establish procedures for a realistic opportunity review at the midpoint of the certification period and shall provide for notice to the public..." This Midpoint Review Report has been modeled after the template prepared by FSHC and modified to more closely reflect the conditions in the municipality, the Settlement Agreement with FSHC, and the adopted 2019 Watchung Housing Element and Fair Share Plan ("HEFSP").

The 2018 Settlement Agreement requires that the midpoint review be posted on the Borough website and a copy provided to FSHC. The review acts as a status report regarding the Borough's compliance mechanisms and whether any unbuilt sites or unfulfilled mechanisms continue to present a realistic opportunity. This review also includes a review of mechanisms addressing the Borough's rehabilitation obligation and the unmet need.

RELEVANT BACKGROUND

Watchung filed its Declaratory Judgment Action on July 2, 2015. The Borough Executed a Settlement Agreement with FSHC on June 7, 2018. The 2018 Settlement Agreement outlines Watchung's affordable housing obligations:

- A four-unit Rehabilitation Obligation,
- A 206-unit unadjusted Prior Round Obligation, and
- A 396-unit unadjusted Third Round (1999-2025) Gap and Prospective Need Obligation.

However, the Borough sought and received a Vacant Land Adjustment ("VLA") for the Prior Round and Third Round. The Prior Round VLA produced a 169-unit Realistic Development Potential ("RDP"), while the Third Round VLA produced a 53-unit RDP. Therefore, the Borough has an Unmet Need of 37-units for the Prior Round and 335-units for the Third Round, for a total combined Unmet Need of 372-units¹.

On September 19, 2018, Judge Thomas C. Miller, P.J.Cv. entered a Conditional Order of Compliance and Approval of Settlement Agreement Between the Borough of Watchung and Fair Share Housing Center following the Fairness Hearing held on August 9, 2018. Thereafter, Watchung prepared and adopted the requisite compliance documents. The Final Compliance Hearing was held on August 28, 2019. On September 5, 2019, Judge Miller issued the Borough the Final Judgment of Compliance and Repose ("JOR") Order.

¹ The Third Round Unmet Need was reduced by expected credit surplus units. The RDP of 53 plus the surplus credits of 8 units, subtracted from the Third-Round obligation of 396 units, result in an Unmet Need of 335 units.

CONDITIONS OF COMPLIANCE

Watchung's JOR does not contain any conditions.

It should be noted that the Borough shall file its first anniversary trust fund monitoring and the first anniversary unit monitoring reports together with this Affordable Housing Midpoint Review Report. These documents will be posted on the Borough's website and filed with the FSHC.

REHABILITATION OBLIGATION REVIEW

As indicated above, Watchung has a 4-unit Rehabilitation Obligation. As noted in Paragraph 5 of the Settlement Agreement, this obligation will be satisfied by reserving at least \$100,000 of the Borough's Affordable Housing Trust Fund account to complete four housing rehabilitations through a Borough-sponsored rehabilitation program.

Community Grants Planning & Housing ("CGP&H") is the appointed Municipal Housing Agent. The rehabilitation activities are being implemented in accordance with the adopted Borough's *Housing Rehabilitation Program Policies and Procedures Operating Manual*.

PRIOR ROUND MECHANISM REVIEW

Watchung received Second Round Substantive Certification from COAH in 1998, which granted a VLA to the Borough for its Prior Round Obligation. This Prior Round RDP is 169. A 43-unit rental bonus credit is provided.

All current Prior Round mechanisms except for the Accessory Apartment Program (10-units) and the Bonnie Burn Road Redevelopment Area (5 units out of a planned 46 affordable units) have already been completed. Additional information on these two mechanisms that have not yet been completed are detailed below. All mechanisms are detailed in the *2019 Watchung HEFSP*.

ACCESSORY APARTMENT PROGRAM

The Watchung Accessory Apartment Program is currently on-going, and it will continue to be implemented and funded to address the 10 accessory apartments which are credited to the Borough's Prior Round Obligation. The Borough adopted an Accessory Apartment Ordinance in 1998 with an amendment adopted in 2006. The FSHC settlement Agreement required that the Borough further amend this regulation to facilitate easier administration review of accessory apartment applications. On December 6, 2018, the Borough adopted Ordinance OR:18/17 which amended the existing accessory apartment regulations to provide for administrative approval of low- and moderate-income accessory apartments instead of requiring conditional use approval.

The Borough has sufficient funds in its housing trust fund to subsidize these 10 units. As detailed in the Spending Plan, the Borough of Watchung plans to fund 10 accessory moderate-income affordable

apartments at \$30,000 per unit, for a total of \$300,000 to be expended from the trust fund. Additional funding may be provided in accordance with the adopted *Borough of Watchung Affordability Assistance Program Policies and Procedures Manual (R17)*. The Watchung Administrative Agent CGP&H is administering this Affordable Housing Program. As of this date, there are no applications pending for affordable accessory apartments.

BONNIE BURN ROAD REDEVELOPMENT AREA

On December 6, 2018, the Borough Council passed on second reading Ordinance OR:18/20 adopting a Redevelopment Plan for a non-condemnation area in need of redevelopment. On April 18, 2019, the Borough Council adopted Ordinance OR:19/05 amending Ordinance OR:18/20. This Redevelopment Plan provides for the Bonnie Burn Road site to be developed as an inclusionary multi-family housing development of a maximum of two hundred and thirty (230) rental apartments including forty-six (46) very low-, low- and moderate-income, non-age restricted affordable family rental units and one hundred eighty-four (184) market-rate units. Five of the planned affordable family rental apartments are included to meet the Borough's Prior Round obligation. The remaining 41 affordable family rental apartments will be used to address the Borough's Third Round obligation.

On December 6, 2018, Watchung conditionally selected and designated BNE-Watchung, LLC as the Redeveloper of the Bonnie Burn Road property. This was conditional with the Redeveloper entering into a Redevelopment Agreement and Financial Agreement, which was not yet accomplished as of June 2020. The Bonnie Burn Urban Renewal Entity LLC ("Redeveloper") filed a preliminary site plan application with the Watchung Planning Board, which was deemed complete on June 19, 2019. This application underwent reviews and had four on-going public hearings with the Planning Board. As of May 2020, the application was still under review and further testimony was needed. Additionally, the Redeveloper was notified that the escrow account was deficient, and the escrow was not replenished within the 10-day deadline as required by ordinance; however, it was finally replenished on May 12, 2020.

The Planning Board was notified that on May 5, 2020, the Redeveloper had terminated its contract with the property owner; but that the property owner had intended to continue the application to completion. On May 13, 2020, the Redeveloper notified the Planning Board that they had assigned all of their right, title and interest in and to the application to the current property owner and that they consented to the property owner's proceeding with the application before the Planning Board.

On May 29, 2020, the Planning Board voted to dismiss the application without prejudice. On June 16, 2020, the Planning Board adopted a resolution (PB20-R6) dismissing the application without prejudice. As noted in the Planning Board resolution:

"NOW, THEREFORE, BE IT FURTHER RESOLVED that the Board recognizes that it is not preventing the owner from applying to the Borough Council for conditional approval appointing the owner as the redeveloper (if required) and that it is not preventing the owner from filing the appropriate application to develop the Property as required by the MLUL and in accordance with all of the requirements of the Redevelopment Plan."

In summary, the Bonnie Burn Road Redevelopment Area is still available and suitable for development in accordance with the *Watchung HEFSP*.

PRIOR ROUND SUMMARY

See the table below for a summary of the affordable units allocated to the Prior Round RDP. In addition, the *2020 Project Unit Monitoring Report and Very-Low Income Unit Report*, prepared by the Watchung Housing Agent CGP&H, provides greater detail on bedroom mix, income levels, and other documentation.

PRIOR ROUND REALISTIC DEVELOPMENT POTENTIAL MECHANISMS						
Development	Block & Lot	Description	Ordinance Adopted (Y/N)	Status	Existing Affordable Units	Proposed Affordable Units
Enable Inc. Group Home	Johnston Drive Extension	Group home for very-low income clients with three bedrooms	N/A	Built & Occupied 12/6/1993. Awarded credits in the 1998 COAH Substantive Certification.	3	
Lakeside Villas at Watchung	B4001/L4	An inclusionary age-restricted for-sale development.	Y	Built & Occupied. Awarded credits in the 1998 COAH Substantive Certification for the proposed facility.	8	
Regional Contribution Agreement-Phillipsburg	NA	RCA for 57 units	Y	RCA done on 11/28/1988. Awarded credits in the 1998 COAH Substantive Certification.	57	
The Point at Watchung	B56,91/I2.01	An inclusionary for-rental multi-family development constructed 4/29/2002	Y	Built & Occupied. Awarded credits in the 1998 COAH Substantive Certification.	40	
TomTom Realty	B4701/L301	Mixed use commercial/affordable family rental units.	N/A	Built & Occupied	3	
Accessory Apartment Program	TBD	100% Affordable Family Rental Apartments under adopted program	Y	Ord. 18/17 amending Accessory Apt. regulations adopted 12/6/2018. Accessory Apt Program Policies and Procedures Manual adopted by Watchung (R17).	0	10
Bonnie Burn Road Redevelopment Area	B74.02/L19.01 & 19.02; B7403/L9 & 10	Inclusionary family rental development with 46 affordable units. Five units credited in Prior Round; the remainder in Third Round.	Y	Bonnie Burn Road Redevelopment Plan adopted by Ord.18/20 on December 6, 2018; Amended by Ord.19/05 on April 18, 2019. BNE-Watchung LLC was conditionally appointed Redeveloper. Preliminary site plan filed; deemed complete; although 4 public hearings have been held, the public hearing process has not yet been completed. On May 5, 2020, the Redeveloper terminated contract with property owner; on June 16, 2020, the Planning Board memorialized a resolution dismissing the application without prejudice. Property owner as assignee of contract purchaser has indicated an intention to continue that development application through completion.		5

THIRD ROUND REALISTIC OPPORTUNITY REVIEW

The realistic opportunity standard applies to all RDP mechanisms for VLA municipalities. The following table summarizes the mechanisms allocated to the Third Round RDP of 53 units. A total of three mechanisms are allocated to the Third Round RDP, which generate 47 credits and 14 rental bonuses. This totals 61 credits which provides a surplus of 8 credits. In addition, the *2020 Project Unit Monitoring Report and Very-Low Income Units Report*, prepared by the Watchung Housing Agent CGP&H, provides greater detail on bedroom mix, income levels, and other documentation.

BRANDYWINE AT MOUNTAIN RIDGE ASSISTED LIVING

Brandywine at Mountain Ridge is an established assisted living facility. Brandywine has agreed to annually certify to the Borough that a minimum occupancy of two Medicaid beds exists at this facility. This documentation will be structured over a 30-year period, similar to other affordable housing credits. At this point, the Borough is in the process of filing deed restrictions documenting this agreement with Brandywine to certify two Medicaid beds, which will be credited to the Borough's affordable housing obligation.

WATCHUNG ASSOCIATES

In November 2017, this 3.4-acre split-zone property received Watchung Zoning Board of Adjustment approval to construct 21 non-age restricted townhomes together with 4 affordable family rental apartment units (Resolution BA17-R6). These affordable units consisting of 1 one-bedroom, 2 two-bedroom and 1 three-bedroom units, will be marketed consistent with State Uniform Housing Affordability Controls. This development is currently under construction. The deed restrictions for these four affordable units will be filed with the County before occupancy of the development.

BONNIE BURN ROAD REDEVELOPMENT AREA

Bonnie Burn Road Redevelopment Area will provide 41 credits in the Third Round. This has been previously discussed in the Prior Round Mechanism Review Section.

THIRD ROUND REALISTIC DEVELOPMENT POTENTIAL MECHANISMS						
Development	Block & Lot	Description	Ordinance Adopted (Y/N)	Status	Existing Affordable Units	Proposed Affordable Units
Brandywine at Mountain Ridge Assisted Living	B391, L30	A 30 year deed restriction on two Medicaid beds.	N/A	Built & Occupied	2	
Watchung Associates, LLC	B301, L31 & 32.01	Inclusionary family housing with 4 affordable units.	N/A	Under construction		4
Bonnie Burn Road Redevelopment Area	B 7402/L19.01 &19.02, B7403/L5 &10	An inclusionary for-rent multi-family development with 46 affordable units. Five affordable units credited for Prior Round; 41 credited for Third Round.	Y	Bonnie Burn Road Redevelopment Plan adopted by Ord.18/20 on December 6, 2018; Amended by Ord.19/05 on April 18, 2019. BNE-Watchung LLC was conditionally appointed Redeveloper. Preliminary site plan filed; deemed complete; although 4 public hearings have been held, the public hearing process has not yet been completed. On May 5, 2020, the Redeveloper terminated contract with property owner; on June 16, 2020, the Planning Board memorialized a resolution dismissing the application without prejudice. Property owner as assignee of contract purchaser has indicated an intention to continue that development application through completion.		41

COMBINED PRIOR ROUND AND THIRD ROUND UNMET NEED MECHANISM REVIEW

The following table summarizes the mechanisms allocated to the Combined Prior Round Unmet Need and Third Round Unmet Need of 372 units. and their current status. This total Unmet Need is addressed through the following mechanisms:

- Mandatory Affordable Housing Set- Aside Ordinance
- Route 22 Affordable Housing Overlay District
- Somerset Street/Watchung Avenue Affordable Housing Overlay Zone

The status of these mechanisms to address Unmet Need is described below:

MANDATORY AFFORDABLE HOUSING SET-ASIDE

On December 6, 2018, the Watchung Borough Council adopted Ordinance #OR:18/19 to establish the Mandatory Affordable Housing Set-Aside requirement. This is a mandatory affordable housing set-aside zoning requirement in accordance with the FSHC Settlement Agreement and the Court Order on Fairness. The ordinance requires that all residential development of 5 or more units that occurs at a density above 6 units per acre arising as a result of a density or use variance or rezoning or approval of a redevelopment or rehabilitation plan shall be required to provide a minimum affordable housing set-aside of 20%, except that the minimum set-aside shall be 15% where affordable rental units are provided. This ordinance excludes sites that are already subject to affordable housing set-aside requirements. As of this date, no affordable housing units have been constructed under this Mandatory Affordable Set Aside Ordinance.

ROUTE 22 AFFORDABLE HOUSING OVERLAY DISTRICT

On December 8, 2018, Ordinance OR:18/18 established the Route 22 Affordable Housing Overlay District. This Overlay District permits multifamily inclusionary development at a density of 14 du/acre with 20% affordable units for for-sale units and 18 du/acre with 15% affordable units for rental units. A minimum of 13% of the affordable units will be available to very low-income households. Further details are available in the Watchung HEFSP. As of this date, no affordable housing unit have been constructed in this district.

SOMERSET STREET/WATCHUNG AVENUE AFFORDABLE HOUSING OVERLAY DISTRICT

On June 20, 2019, Ordinance OR:19/19 established the Somerset Street/ Watchung Avenue Affordable Housing Overlay District. This district permits mixed-use development as a principal permitted use consisting of first floor commercial uses with residential units on the second and third floors being only permitted in conjunction with affordable housing. Residential use is permitted at a density of 6 du/acre for for-sale units and 10 du/acre for rental units, with a minimum set-aside of 20% where the affordable for sale-units are provided and a minimum of 15% where affordable rental units are provided. As of this date, no affordable housing units have been constructed in this district.

UNMET NEED MECHANISMS						
Development	Block & Lot	Description	Ordinance Adopted (Y/N)	Status	Existing Affordable Units	Proposed Affordable Units
Mandatory Set Aside Ordinance		Requires all residential development of 5 or more units at a density above 6 du/ac. as a result of a density or use variance, rezoning or approval of a redevelopment or rehabilitation plan is required to provide a 20% minimum affordable housing set-aside, except minimum 15% for affordable rental units.	Y	Mandatory Set Aside Ord. 18/19 adopted on December 6, 2018, amended through Ord. 19/04 adopted April 4, 2019.		TBD
Rt. 22 Affordable Housing Overlay District	B64.02/L 3 & 5	Overlay Zone that permits inclusionary residential development.	Y	Route 22 Affordable Housing Overlay District Ord. 18/18 creating the district was adopted on December 6, 2018.		TBD
Somerset Street/Watchung Avenue Affordable Housing Overlay District	B4701/L1-11 & 13	Overlay Zone that permits inclusionary residential development within a mixed use development.	Y	Somerset Street/Watchung Avenue Affordable Housing Overlay District Ord. 19/9 creating the district was adopted on June 20, 2019.		TBD

VERY-LOW INCOME ANALYSIS

Paragraph 10 of the Settlement Agreement indicates that 13% of all units referenced in the Agreement constructed after July 1, 2008 shall be very-low income units. Half of those units must be available for families. The following table provides a summary of the Borough's very-low income units and their current status.

VERY-LOW INCOME UNITS					
Affordable Units Constructed or To Be Constructed After 2008	Total Affordable Units	Proposed VLI Units	Existing VLI Units	VLI Percentage of Total	Status
Tom Tom Realty	3	0		0.0%	10/1/2017 Completed. Approved 3 moderate income units.
Watchung Associates	4	1		25.0%	Zoning Board approval 11/9/2017. Under construction.
Bonnie Burn Road Redevelopment Area	46	6		13.0%	Rezoned by Ord. 19/05. BNE Urban Entity LLC site plan application was submitted and deemed complete. Although 4 public hearings were held, the hearing process was not completed. On May 5, 2020, the applicant notified the Planning Board it had terminated its contract to purchase the property. The application was dismissed by Planning Board without prejudice. The resolution memorializing the dismissal was adopted by the Board on June 16, 2020.
Brandywine at Mountain Ridge Assisted Living	2	2		100.0%	Deed restriction on 2 Medicaid beds for 30 year period. Deed restriction is in process of being filed. Unit certification will be on an annual basis.
TOTALS	55	9	0	16.4%	

CONCLUSION

As per Paragraph 8 and 9 of the 2018 Settlement Agreement, the Borough was required to provide a realistic opportunity for the development affordable housing through the adoption of inclusionary zoning:

- Ordinance OR: 18/17 which provides for Affordable Accessory Apartments.
- Ordinance OR: 18/18 which provides for the Route 22 Affordable Housing Overlay District.
- Ordinance OR: 18/19 which provides for a Mandatory Set-Aside Ordinance.
- Ordinance OR: 18/20, which establishes the Bonnie Burn Road Redevelopment Area, amended by Ordinance OR:19/05 on April 18, 2019.
- Ordinance OR:19/19 which guides development in the Somerset Street/Watchung Avenue Affordable Housing Overlay District.

As demonstrated, Watchung has adopted the necessary ordinances for the above mechanisms, thereby creating the realistic opportunity that is required by statute.

In conclusion, Watchung's implementation of its 2019 HEFSP continues to create a realistic opportunity where that standard is applicable, and the Borough has implemented its Unmet Need mechanisms, which continue to be constitutionally sufficient.

APPENDIX

- Project/Unit Monitoring Report, June 20, 2020 prepared by CGP&H
- Very-Low Income Units Report, June 20, 2020 prepared by CGP&H
- Trust Fund Report as of December 31, 2019, prepared by CGP&H

Watchung Borough, Somerset County - Prepared by CGP&H Municipal Administrative Agents
Project/Unit Monitoring - June 20, 2020 (Page 1)

Site / Program Name	Watchung Housing Rehabilitation Program					Accessory Apartment Program					Bonnie Burn Redevelopment Area					Brandywine at Mountain Ridge Assisted Living					The Point at Watchung				
Project Type	Housing Rehabilitation Program					100% Affordable Family Rental					Inclusionary Family Rental					Inclusionary Assisted Living					Inclusionary Family Rental				
Block & Lot / Street	Various					Various					B: 7402 / L: 19.01 & 19.02, B: 7403 / L: 5 & 10 291 Bonnie Burn Rd					B: 301 / L:30 676-680 Mountain Blvd					B: 56.01 / L: 2.01 Crystal Ridge Dr.				
Status	Program implementation in progress					Program implementation in progress					Proposed/Zoned					Completed					Completed				
Date	Various					Various					Redevelopment Plan Approved 12/6/2018					See Unit Notes					4/29/2002				
Length of Affordability Controls	10 Years					10 Years					30 Years					30 Years					30 Years				
Administrative Agent	CGP&H, LLC, 1249 South River Road, Suite 301, Cranbury, NJ 08512, (609) 664-2769, https://www.affordablehomesnewjersey.com/					CGP&H, LLC, 1249 South River Road, Suite 301, Cranbury, NJ 08512, (609) 664-2769, https://www.affordablehomesnewjersey.com/					T.B.D.					Welltower Inc., 4500 Dorr Street, Toledo, OH 43615, (419) 247-2800, https://welltower.com/					CGP&H, LLC, 1249 South River Road, Suite 301, Cranbury, NJ 08512, (609) 664-2769, https://www.affordablehomesnewjersey.com/				
Contribution	N/A					N/A					N/A					N/A					N/A				
Type of Units	Housing Rehabilitation Program					Family Rental					Family Rental					Assisted Living					Family Rental				
Total Affordable Units	4					10					46					2					40				
Units Notes	Municipality will complete its 4 unit obligation by 7/2025					Municipality will complete its 10 unit obligation by 7/2025.					Applicant filed for preliminary site plan approval in 5/2019. On 5/5/2020, the applicant withdrew from its contract with the property owner. On 6/16/2020, Planning Board passed a resolution of application dismissal without prejudice.					2 Medicaid Beds, deed restriction not yet recorded.									
Income/Bedroom Distribution	Eff. Std.	BR 1	BR 2	BR 3	BR 4	Eff. Std.	BR 1	BR 2	BR 3	BR 4	Eff. Std.	BR 1	BR 2	BR 3	BR 4	Eff. Std.	BR 1	BR 2	BR 3	BR 4	Eff. Std.	BR 1	BR 2	BR 3	BR 4
Very-Low-Income	-	-	-	-	-	-	-	-	-	-	-	1	4	1	-	-	2	-	-	-	-	-	-	-	-
Low-Income	-	-	-	-	-	-	-	-	-	-	-	3	10	4	-	-	-	-	-	-	-	4	13	4	-
Moderate-Income	-	-	-	-	-	-	-	-	-	-	-	4	14	5	-	-	-	-	-	-	-	4	12	3	-

Project/Unit Monitoring - June 20, 2020 (Page 2)[illegible]

Project/Unit Monitoring - June 20, 2020 (Page 3)[illegible]

Watchung Borough, Somerset County: Very-Low Income Units 2020

Development/Compliance Mechanism	Project Status	Controls Date	Affordable Units	Very-Low Income Units
Tom Tom Realty	Completed	10/1/2017	3	0
Watchung Associates	Under Construction	PB Approval 11/9/2017	4	1
Bonnie Burn Redevelopment Area	Proposed/Zoned	Redevelopment Plan Approved 12/6/2018	46	6
Brandywine at Mountain Ridge Assisted Living	Completed	See Unit Notes	2	2
Totals:			55	9
			<i>(%) of VLI units: 16%</i>	

Watchung Borough, Somerset County
Trust Fund Balance as of December 31, 2019

	INCEPTION DEC 31, 2018	JAN 1, 2019 DEC 31, 2019	TOTAL
REVENUE SUMMARY			
Barrier Free Escrow	\$0.00	\$0.00	\$0.00
Development Fees	\$2,692,797.52	\$348,950.00	\$3,041,747.52
Interest Earned	\$170,869.88	\$21,884.77	\$192,754.65
Other Income	\$0.00	\$0.00	\$0.00
Payments-in-Lieu of Construction	\$0.00	\$0.00	\$0.00
TOTAL	\$2,863,667.40	\$370,834.77	\$3,234,502.17
EXPENDITURE SUMMARY			
Administration	\$412,790.88	\$43,750.09	\$456,540.97
Affordability Assistance	\$0.00	\$0.00	\$0.00
Barrier Free Conversions	\$0.00	\$0.00	\$0.00
Housing Activity	\$1,391,108.00	\$0.00	\$1,391,108.00
TOTAL	\$1,803,898.88	\$43,750.09	\$1,847,648.97
TRUST FUND ACCOUNT BALANCE AS OF December 31, 2019			\$1,386,853.20

HOUSING ACTIVITY : JAN 1, 2019 - DEC 31, 2019

TOTAL	\$0.00

AFFORDABILITY ASSISTANCE: JAN 1, 2019 - DEC 31, 2019

TOTAL	\$0.00