

Site Suitability Analysis

CAMP EFS SITE FOSTERTOWN ROAD

September 23, 2025

Prepared by:

Tiffany A. Morrissey, AICP, PP #5533

The original of this document was signed and sealed in accordance with NJAC 13:41-1.3.b

Tiffany A. Cuvillo, PP, LLC
*T.A. Community Development
& Planning*

Tiffany A. Morrissey, PP, AICP
7 Equestrian Drive
Galloway, NJ 08205
(856) 912-4415
tamorrissey@comcast.net

Table of Contents

| | |
|--|----------|
| INTRODUCTION | 2 |
| ANALYSIS..... | 3 |
| <i>Site Description.....</i> | <i>3</i> |
| <i>Available Site.....</i> | <i>4</i> |
| <i>Approvable Site</i> | <i>4</i> |
| <i>Developable Site</i> | <i>5</i> |
| <i>Suitable Site.....</i> | <i>7</i> |
| Compatible Land Uses | 7 |
| Appropriate Streets | 7 |
| Environmental policies delineated in N.J.A.C. 5:93-4 | 8 |
| CONCLUSION | 9 |

Appendix I – Alta Survey

Appendix II - Title Commitment and Search

Appendix III – Concept Development Plans

Appendix IV – NJDEP Wetland LOI Application

Appendix V – Water Service Exhibit

Appendix VI – Sewer Service Exhibit

Appendix VII – Will Serves – Medford Water and Sewer, Verizon, PSE&G

INTRODUCTION

This report has been prepared to address the site suitability for the Camp EFS affordable housing site consisting of Block 302, Lots 28.02 & 39.03 on the Medford Township tax maps. As proposed 201 units would be constructed, including 40 affordable housing units. This site addresses a portion of the Township’s Fourth-Round affordable housing obligation as provided for in their Housing Element and Fair Share Plan (“HEFSP”). The Township’s HEFSP provides for the property to contain 40 affordable age-restricted units.

This site was raised by an objector as not being suitable because it is outside an approved sewer service area. This site is partially within a Redevelopment Area with the balance of the site expected to be designated in need of redevelopment later this year. The Township adopted Resolution 110-2025 directing the Planning Board to conduct the necessary investigation on June 17, 2025. The site is partially within a sewer service area and surrounded by an existing sewer service area. While permitting is necessary to provide for the proposed development, the site is suitable, approvable and developable as will be demonstrated below.

With respect to the suitability of this site, the following timeline and site suitability analysis demonstrates that the site is available, approvable, developable and suitable.

Timeline for Camp EFS Property:

| | |
|------------------------|--|
| May 16, 2017 | Redevelopment Area Designation Adopted by Township ¹ |
| August 28, 2018 | Redevelopment Designation approved by State of New Jersey |
| June 14, 2025 | Adoption of Township Fourth- Round HEFSP |
| June 17, 2025 | Governing Body Resolution 110-2025 directing Planning Board to conduct redevelopment investigation on lot 28.02 & 39.03 ² |

¹ The Township designated Block 302, Lot 28 in need of Redevelopment. Subsequently lot 28 was subdivided into lots 28.01 and 28.02. Lot 28.02 is within an approved redevelopment area.

² The Township included Block 302, Lot 28.02 in the resolution even though Lot 28.02 is already designated from the 2017 redevelopment designation.

| | |
|-----------------------|---|
| September 2025 | NJDEP LOI Application Submitted |
| September 2025 | Traffic Study Scheduled |
| September 2025 | Archeological Study in Progress |
| September 2025 | WQMP Amendment Application in Progress |
| September 2025 | Geo Tech/Soil Testing Completed – Awaiting Report |
| October 2025 | FHA Line Verification Submission |

The above timeline shows that there has been continuing approvals and permitting activity for the Camp EFS property. The Township completed the Redevelopment Designation for part of the site and has directed the Planning Board to include the additional parcels. Applications have been or are in the process of being submitted to various agencies to address all necessary permitting. These include environmental permitting, WQMP amendments and verification of Flood Hazard Areas. The above and details below show a clear effort to the continuing development plans for the Camp EFS property and that the site continues to represent a realistic development opportunity for affordable housing.

ANALYSIS

When identifying a site for affordable housing development, the site intended for development must be suitable for that purpose. Site Suitability is addressed in COAH’s Second Round regulations at N.J.A.C. 5:93-5.3. The criteria which a site is to be evaluated includes a finding that the site is available, approvable, developable and suitable as defined in N.J.A.C. 5:93-1.

Site Description

The Camp EFS site is located along Fostertown Road and Church Road. The site contains a total of 62.22 acres in the Township of Medford. The proposed site development includes the construction of 201 total residential units with 40 affordable housing units. The proposal includes

a total of 158 market rate townhouse units and 40 affordable rental units as well as 3 single-family lots along Church Road. The total density is proposed at 3.23 units per acre.

The site is located within an approved Redevelopment Area. The Township is preparing a Redevelopment Plan which would allow the proposed development. This is expected to be approved in early 2026. The proposed concept plan identifies the location of wetlands and buffers. All development is outside of the restricted and environmentally sensitive areas. The site is able to accommodate the required stormwater management facilities and site improvements to facilitate the proposed development.

Available Site

“Available site” means a site with clear title, free of encumbrances which preclude development for low and moderate income housing.

The site has a clear title and is free of encumbrances, which preclude development of affordable housing.

Supporting Documents:

- Appendix I – Alta Survey
- Appendix II - Title Commitment and Search

Approvable Site

“Approvable site” means a site that may be developed for low and moderate income housing in a manner consistent with the rules and regulations of all agencies with jurisdiction over the site. A site may be approvable although not currently zoned for low and moderate income housing.

The subject property is included in an approved Redevelopment Area and a Redevelopment Plan is being completed. The Redevelopment Area was created in 2017 and approved by the State of New Jersey on August 28, 2018. The Redevelopment Plan is being prepared and is expected to

be completed early next year (2026). The proposed development of 201 total units including up to 40 affordable units will be permitted in accordance with an adopted Redevelopment Plan.

Supporting Documents:

- Appendix III – Concept Development Plan

In addition to the above, the following sections further the approvable site standard through outside agency permitting and status. The permitting for a Wastewater Quality Management Plan (“WQMP”) amendment is expected to be submitted by October 2025. An application has been submitted to New Jersey Department of Environmental Protection (“NJDEP”) for a Letter of Interpretation (“LOI”). An application is being prepared with respect to the Flood Hazard Area. Approvals and applications are either in the process of submission or pending for outside agencies demonstrating that the site remains viable and approvable.

Developable Site

“Developable site” means a site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable area wide water quality management plan (including the wastewater management plan) or is included in an amendment to the area wide water quality management plan submitted to and under review by DEP.

The proposed concept plan for development includes a delineation of wetlands and buffers consistent with the NJDEP LOI application. An application has been submitted to NJDEP for a LOI as to the location of wetlands and wetland buffers. The concept plans indicate the anticipated wetland lines and buffers and all development is outside of these areas.

It is expected that the site will be partially impacted by a NJDEP Flood Hazard Area (FHA), however all proposed development is outside of the regulated areas. The FHA are expected to be in the areas where wetlands are identified.

The subject site would require approval of an amended WQMP to extend sewer to the site. The property is partially within an existing Sewer Service Area (SSA), the amendment would extend the area to the entire property.³ The fact that part of the site is already within a SSA contributes to the approvability of the proposed amendment. The site is also surrounded by existing SSA with to the north and east along Fostertown Road and to the west along Church Road. An application is in the process of being completed and will be submitted by October of this year (2025).

The Township has determined that there is adequate capacity for public sewer and public water through the Township of Medford. The Township of Medford Utilities Authority issued a “will-serve” letter indicating there is capacity for the project. Similar “will-serve” letters have been issued by Verizon and PSE&G.

Soil Testing has been completed and a report is expected to be completed within the next few weeks. The soil testing will determine which soils on site are suitable for development and will be able to support an approvable stormwater management design. The current contract purchaser has engaged a Geo-Technical engineering Firm to provide this testing.

The above contributes to the determination that the subject site is a Developable Site as provided for in the Township’s HEFSP.

Supporting Documents:

- Appendix IV - NJDEP Wetlands LOI Application
- Appendix V – Water Service Exhibit
- Appendix VI – Sewer Service Exhibit
- Appendix VII - Will Serves
 - Medford Public Works Water & Sewer
 - PSE&G Gas and Electric
 - Verizon Telecommunications

³ The area along Church Road is within an approved SSA.

Suitable Site

“Suitable site” means a site that is adjacent to compatible land uses, has access to appropriate streets and is consistent with the environmental policies delineated in N.J.A.C. 5:93-4.

Compatible Land Uses

The Camp EFS property has frontage and access along Fostertown Road. The property is bordered to the north by to medium size warehouse buildings within the Townships Planned Industrial (PI) zone. To the east across Fostertown Road is a softball field and the Township water and sewer facilities. The area across Church Road is within the Township’s Growth Management North (GMN) zone which includes a single-family residential uses. The properties are within the Township’s Agricultural Retention (AR) zone. The AR zone permits a variety of residential developments including Senior Citizen Planned Developments on tracts of at least 100 acres with public water and sewer in select areas. The AR zone also permits residential cluster development. The AR zone while entitled agricultural retention does permit similar land use developments to the proposed development in terms of housing type and density. The proposed residential development would be located around similar and compatible land uses.

Appropriate Streets

The subject property is located along Fostertown Road, a two-lane roadway with a posted speed limit of 45 mph. Fostertown Road provides connections to County Route 541 (Main Street) in Lumberton Township and County Route 616 (Church Road) in Medford Township. A traffic study is scheduled to be completed in the Fall of 2025.

The site can be developed consistent with the Residential Site Improvement Standards, N.J.A.C. 5:21-1.4 for Streets and Parking.

Environmental policies delineated in N.J.A.C. 5:93-4

In accordance with the regulations a site which is impacted by inland wetlands, flood hazard areas and steep slopes may be excluded as potential sites for affordable housing. That does not mean any site with these conditions shall be excluded but requires a review of these conditions to determine if these conditions “render a site unsuitable for low- and moderate-income housing.” (N.J.A.C. 5:93-4.2(e)2.ii.) The regulations provide further that where these conditions exist that low- and moderate-income housing shall not be permitted “on that unsuitable portion of the site; provided however, that this rule shall not prohibit construction of low- and moderate-income housing on the remainder of the site.” (N.J.A.C. 5:93-4.2(e)2.ii.)

While the Camp EFS site contains inland wetlands, flood hazard areas and limited steep slopes, these conditions do not impact the entire site. As demonstrated on the submitted concept plans, the site can be developed outside of these areas in a manner which meets all environmental regulations as noted below.

Inland Wetlands

An application has been submitted to NJDEP for an LOI which identifies wetlands and wetland buffers. The concept plans include the anticipated wetland areas and buffers. The wetland areas run along the western property border and extend to the southeast. The plan includes buffers of 50-feet. An Archeological study has been completed for the subject site and a report is expected in the next few weeks. The study will be submitted to NJDEP to supplement the wetlands application in the event there is a wetlands disturbance permit required.

Flood Hazard Areas

The property is expected to be subject to FHA. An application to verify the FHA line is in the process of being completed. It is expected that the FHA will coincide with the location of the

wetland areas and the areas proposed for development would not be impacted. The location of the flood hazard area will be verified through a NJDEP Flood Hazard Verification.

Steep Slopes

The proposed developed portions of the site are not encumbered by slopes in excess of 15%. The site design avoids all steep slopes.

Supporting Documents:

- Appendix IV – NJDEP Wetland LOI Application

CONCLUSION

The subject property with frontage and access along Fostertown Road is suitable for the proposed development of 201 residential units, including up to 40 affordable housing units. The proposed site has clear title and sufficient unrestricted land area to accommodate the development. The development of the site requires an amendment to the WQMP, an application is being submitted in October of this year. The required environmental permits are being submitted, with the application for an LOI submitted and FHA to be submitted later this year. There are no unusual conditions which would result in the restriction or prevention of the proposed site development. The Township is working with the developer to create a Redevelopment Plan to provide for the proposed development. Approval of the Redevelopment Plan is expected in early 2026.

In my professional opinion, this site is suitable, approvable and developable for the proposed 201 residential units. The site provides an appropriate location to create a variety of housing types in the municipality. This creates a greater opportunity for lower income families in the region to find affordable housing. Additionally, the timeline of development approvals demonstrates that the site remains viable and continues to provide a realistic opportunity for an inclusionary affordable housing development.