### **Township of Burlington**

#### RESOLUTION

2025-R-022

# RESOLUTION OF THE TOWNSHIP OF BURLINGTON, COUNTY OF BURLINGTON, STATE OF NEW JERSEY COMMITTING TO COMPLY WITH AMENDED FAIR HOUSING ACT

**WHEREAS**, the Township of Burlington, County of Burlington, State of New Jersey, (hereinafter, "Township" or "Burlington") has, since the inception of municipal affordable housing regulations in 1986, voluntarily complied in fulfilling its fair share 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") concerning the Round 4 affordable housing obligations for the years 2025 - 2035; and

**WHEREAS**, the Amended FHA requires the Department of Community Affairs ("DCA") to provide an estimate of the present need, also referred to as the rehab obligation, and the Round 4 prospective need of all municipalities by October 20, 2024 based upon the criteria on the Amended FHA; and

WHEREAS, the DCA issued a report on October 18, 2024 ("DCA Report") setting forth its estimate of the present need and the Round 4 prospective need obligation for all municipalities based upon its interpretation of the standards in the Act, wherein it reported Burlington's Round 4 Present Need (Rehabilitation) Obligation as 132 and its Round 4 Prospective Need Obligation as 308; and

**WHEREAS**, the Amended FHA provides that the DCA Report is non-binding while enabling municipalities to propose a different fair share affordable housing obligation from those reported by the DCA 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 P.L. 2024, c.2, 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 windshield survey and also empower municipalities to secure vacant land adjustments, durational adjustments and other adjustments; and

**WHEREAS**, the Township accepts its Present Need ("Rehabilitation") Obligation of 132 as reported by the DCA in its October 18, 2024 Report subject to its right to do a windshield survey in accordance with COAH standards in conjunction with the Housing Element and Fair Share Plan it files by June 30, 2025; and

**WHEREAS**, the Township Engineer and Affordable Housing Planner ("Township Professionals") have reviewed the data used by DCA that is the basis for the 3 allocation factors used to determine Burlington's share of the regional need; and

**WHEREAS**, more specifically, the Township Professionals have reviewed the data that the DCA used to compute the Land Capacity Allocation Factor that the DCA provided on or about November 27, 2024; and

WHEREAS, the link to the DCA GIS data importantly includes the following language expressly recognizing that its data may be incorrect:

The land areas identified in this dataset are based on the best available data using publicly available data enumerated in N.J.S.A. 52:27D-304.3c.(4) to estimate the area of developable land, within municipal and regional boundaries, that may accommodate development. It is important to note that the identified areas could be over or under inclusive depending on various conditions and that municipalities are permitted to provide more detailed mappings as part of their participation in the Affordable Housing Dispute Resolution Program. (emphasis added); and

WHEREAS, the Township Professionals based upon their detailed review have determined that the DCA was over inclusive in the land it found to be developable, and as shown in the January 21, 2025 report prepared by its expert, Kendra Lelie, PP, AICP, which is attached hereto as Exhibit A, the Township finds that only 135 acres are developable, not the 797 acres that the DCA reported in computing the Land Capacity factor; and

WHEREAS, upon correcting the data used to determine the Land Capacity Factor, the correct Round 4 prospective need number is 201 not 308; and

**WHEREAS**, Township's calculation of need is entitled to a "presumption of validity" because it complies with Sections 6 and 7 of the Act; 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 any and all rights to avoid any claim that it has waived them resulting from proposed legislation and ongoing litigation concerning the Act; 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 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, the Township of Burlington finds that in accordance with the Act it is in its best interest to declare its obligations in accordance with this binding resolution; and

WHEREAS, in addition to the above, the Acting Administrative Director of the Courts issued Directive #14-24, dated December 13, 2024, mandating that a municipality seeking a certification of compliance with the Act must 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, the Township of Burlington seeks a certification of compliance 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, by the Township Council as follows:

- 1. The preamble clauses are incorporated herein.
- 2. For the reasons set for the in this resolution and its attachments, the Township of Burlington commits to a Round 4 Present Need ("Rehabilitation") Obligation of 132 and a Round 4 Prospective Need "(New Construction") obligation of 201 as set forth in Exhibit A to this Resolution, subject to all reservations of all rights, resulting from, but not limited to, legislation, administrative regulations, and/or resulting from judicial determinations.
- 3. The Township hereby directs its Affordable Housing Counsel to file a declaratory judgment complaint in the appropriate venue within 48 hours after adoption of this resolution.
- 4. The Township also 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.

**DATE:** January 21, 2025

TOWNSHIP OF BURLINGTON

Patricia M. Siboczy President of Council

ATTEST:

Mary E. Field, RMC

Municipal Clerk

### **CERTIFICATION**

I HEREBY CERTIFY that the foregoing Resolution is a true and exact copy of a resolution adopted at the meeting of the Township Council of the Township of Burlington, County of Burlington, State of New Jersey, 851 Old York Road, Burlington, New Jersey 08016 held on Tuesday, *January 21*, 2025 and duly recorded in my office; that all requirements of law pertaining to the conduct of said meeting and the passage of this resolution were observed; and that I am duly authorized to execute this certificate.

Dated this 21st day of January 2025.

Mary E. Field, RMC Municipal Clerk

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P.O. Box 236 2 East Broad Street, 2<sup>nd</sup> Floor Hopewell, NJ 08525 609-455-0972 (v) 609-374-9939 (f) klelie@kylemcmanus.com

To:

Jeffrey Surenian, Esquire, Township Affordable Housing Counsel

**David Serlin, Esquire, Township Counsel** 

From:

Kendra Lelie, PP, AICP, LLA

Re:

**Fourth Round Prospective Need** 

Date:

January 21, 2024

The methodology used by the Department of Community Affairs (DCA) yields a total fourth-round obligation of 308 units. The DCA released additional data related to the Land Capacity Factor component that is one of three metrics used to determine a municipal Fourth-Round obligation in accordance with the 2024 Fair Housing Act (FHA). The Land Capacity Factor data was released on November 27, 2024, which was a month after the FHA deadline for the issuance of the non-binding obligation.

Kyle + McManus Associates recalculated the Land Capacity Factor (LCF) as indicated below and recommends the Township adopt a Fourth Round Prospective Need of 201 units. Our office and the Township Engineer reviewed the DCA parcel data for the Township which includes land areas identified as developable. The DCA recognized in the release of the LCF information that the identified areas could be over or under inclusive depending on various conditions and a municipality may provide more detailed analysis and mapping to support a different LCF value. Based on the developable land analysis, the DCA parcel data was over inclusive as indicated in this report.

Broadly speaking, there are 6 steps to determine the obligation for each municipality. Each step and commentary regarding the potential for alteration of the data input follows:

- 1. <u>Identify the housing region</u>. Burlington Township has been and continues to be, as per the FHA, in Region 5. This region includes Burlington, Camden and Gloucester Counties.
- Determine the regional (affordable housing) need. The FHA sets forth that the regional need for the 10-year round (2025-2035) shall be based on the household change experienced in the region between the most recent federal decennial census, and the second-most recent federal decennial census. The resulting change in households is divided by 2.5. The affordable housing need in Region 5 is determined to be 9,134 dwelling units.
- 3. <u>Determine the regional and each municipal equalized nonresidential valuation factor</u>. This step requires that the changes in nonresidential property valuations in the municipality, since the beginning of the round preceding the round being calculated, shall be divided by the regional total change in nonresidential



valuation. The FHA states the data input shall be that which is published by the Division of Local Government Services. The division annually publishes a summary of municipal tax data, including a *Non-Residential Summary* of *Non-Residential Value*. This data addresses the value of all commercial, industrial, and apartment properties in the municipality. However, the value of the apartment properties are not included in the nonresidential valuation factor.

- 4. Determine the municipal and regional income capacity factor. This step is an average of 1) the municipal share of the regional sum of the differences between the median municipal household income and an income floor of \$100 below the lowest median household income in the region and 2) 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. The FHA states the data input shall be American Community Survey ("ACS") five-year estimates. The ACS publishes municipal median household incomes as part of its five-year estimates.
- 5. <u>Determine the municipality's land capacity factor</u>. Estimate municipal developable land using the most recent land use land cover data and weighing such land based on the planning area type in which such land is located. The FHA sets forth one of three weighting factors for a variety of planning areas across the state. Developed areas of the State, such as Planning Areas 1 and 2, Centers, etc. have a weight of 1.0. Rural and environmentally sensitive planning areas have a weight of zero; the remaining areas have a weight of 0.5.

The parcels identified as developable in the DCA's calculation of the LCF for Burlington Township is overinclusive. Accordingly, I believe the developable land should be adjusted from 797 acres to 135 acres. The following criteria were utilized to exclude parcels as developable:

- Areas or portions of areas <25' wide (because DCA's methodology report states that a 25' by 100' area was their minimum threshold for developability).</li>
- Areas within the regulatory floodway.
- Open space/parkland properties with deed restrictions and/or on ROSI.
- Properties under construction or recently developed.
- Sites with site plan approvals for development and/or permits issued for development.
- Public utility parcels, NJDOT/NJ Turnpike Authority parcels, DRPA parcels, railroad properties, rights-of-way, stormwater management, etc.
- Properties with easements restricting development within developable area.
- Properties that are within PA4 or PA5.

Attached to this report is the developable land analysis table for Burlington Township that supports the revised LCF value.



6. <u>Determine the municipal obligation.</u> The three factors (nonresidential value, income, and land capacity) are averaged and then applied to the regional need to determine how the need shall be allocated to each municipality.

## Fourth Round Obligation Methodology Summary

	DCA	KMA
Household Change (Region 5)	22,835	22,835
Low & Mod Home Estimate (Region 5)	9,134	9,134
Nonresidential Valuation Factor	4.41%	4.41%
Regional Income Capacity Factor	1.46%	1.46%
Land Capacity Factor	4.25%	0.75%
Average Factor	3.37%	2.20%
Prospective Need	308	201

1275. 276	200000000000000000000000000000000000000	Property		PA	1
Block Lot	Property Location	Class	Acreage 71.673	Weight	Part of MCF property. Already developed as a CCRC w/ GDP approval  Expline solar facility and approved for warehouse and retail. Both under construction
54 4 574 12	STAWARE RIVER & RAFIROAD BROWLEY BLVD	39	46.37h 41.587	H	Approved for a 500-unit residential development with 20% AR, Under construction.
109.31 1	SUNSET ROAD BURLINGTON (C) PAGE	1	11,900 33,579		Oevelopable, but nothing approved, Approx, 50% wellands, 37.85 per DCA. However, all but 11.9 scree is PA5 - environmentally seneritive Part of MCF property. Could be developed. Not developable as most of the property is In PA4 - rural.
137 2 522 2 153 1.01	OLD YORK ROAD MI HOLLY ROAD	38	27.075 36.203		Part of MCF property. Could be developed.  Part of MCF property. Could be developed. Possible minor wellands impact. Not developable as all of the property is in PAS
153 1.01	DULTYSTANE	38	21.826		Owned by Whitesell. They have a concept plan for a warehouse development.  13.3 acres. Owned by Adler Develorment, Recently approved for a 200,000 SF warehouse.
100 201	HOO BEVERLY HOAD N OF FOURTUN 299 HEAR ROAD	33	15.844		Yes, landiocked, Steep alopes, potential flood plain issue. Difficult to serve with W&S. Owned by Adler development, Approved for 160,000 SF flex space (office/warehouse)
194.01	RIVER RD & DEL RIVER	1	15.817		Application pending fire a warehouse development. Should discuss.  Take a look at this for 100% project  Owned by Whitself. They have a concept stan for a warehouse development. Floodplain - not developable.
109.05 81	BERTHO DRIVE	160	15,660	1	Dedicated Township open space for recreation size. Not on ROSI. Possible significant wetlands impact on undereloped portion.
123 3	TWE A WEST AMOTON LINE	195 30	16.643 13.435 11.631	世	Owned by MCF. Site of their Grand Lodge Landlocked, Not served with W&S.
154.01 3	RIVER ROAD & DELAWARE RIV		11,157	1	Slapificart wetlands impacts. According to Tax Map < 2 ac, developable. Not developable as the property is in PAS Estable preports. Conceptual plan for watchbuse development. Part of MCF property, Same as #2.
138 3.01	JACKSONVILLE ROAD 1810 ROUTE-130	19C 30	10,662	1	Dedicated open space:  Owned by Adler development. Approved for 105,000 SF flex space (office/watchouse). Could
105 5	SALEM ROAD		9.476	1	be developed.  Owned by Kenosha Development, Could be developed.
101 1 103 2.10	PEARL ST TO RR		0.005		Printing doors specie (conservation essement RE: Tillinghast), OH ROSI. Owned by Matrix Development: Between it is a former tareful. Historically filed. Owned by Virtual Fealth. Tax Mass inclinates 67 ac could be developed.
104.23 9.02	SUNSET ROAD RANCOCAS ROAD	-	7,275	1	Owned by Trade Burnoton, Could be developed.  Owned by Trade Burnoton, Could be developed.  Owned by Trade Burnoton, Could be developed.  Owned by SJK Properties, Recent approval (prelim) for 9 single-family homes, Wetlands
119 10	BUNBET ROAD	-	9.756		Impacts but could be developed. Owned by Burington Woods Reatly, Landisched parcet Part of a skilled nursing facility.
133 102	JACKSONVILLE HOAD	-	6.400	1	Prior appoint for 8 single-family homes. Presently, not served by W&S. Could be developed. Weighting should be 4 and 5 - not contributing to developable land
133 1.00 154.03 5 86 7.01	RIPARIAN RIGHTS			1	SAME BLOCK & LOT AS #2 ABOVE Owned by Christial Properties. Likely dredge spoils sike. Presently, not served by W&S.
12301 301 180 2	ELECWIANE MILITARY	100	3.790 5.011	4	Municipal properly, Welthand protection area 8 regional SWM basin Manicipal properly, Significant wrettands impacts. Not accessible. Personved ocen space (conservation casement RE: Tininghast). On ROSI
1011 2	HISTORY HOUSE	1	3.50	3	Former tank farm site. Could be environmental impacts. Irregular shape. Presently, not served by W&S: Contaminated
131.01 1.02	CAMEAD ROAD 411 FOUNTAIN AVENUE	100	5373	+	Municipal property. Significant wetlands impacts. Could be developed.  Existing house of worship (church) property. Wetlands and steep slopes.
106.01 2	2516 RANCOCAS ROAD	160	4 900	-1	Municipal property, Almost entirely wetlands. No access to uplands.  Patentals wetlands and floodplain impacie. Not presently served by W&S, Could be developed.
193 102	MORSONALIS ROAD	38	4574	-1	SAME BLOCK & LOT AS #31 ABOVE  Not presently served by W&S, Could be developed, in PA4 and PA5 - no weighting for developable parcel
192 26 123.01 3.01	CADILLAC ROAD KUROW CARE	30 190	4 800	+	Owned by MCF, 2.6 Ac, per Tax Map. Could be steveloped: Includes other adjacent tota. In PA5 - no weight for developable property Municipal property. Significant wetlands & store stoce impacts.
101.32 2.05	SALEM ROAD 204 SUNSET HOAD	15C	4 337		Municipal property Could be developed. Correct block and lot? Fully developed house of worship site.
152 1 10 U	OFF DANELS WAY STORENGE	180	4.107 4.107		Declarated open space lot for Bromley Place development. Rightims contridor. Land locked. Could be developed. In PAS - no weight for developable land.
139 5 12003 1	10 TERRILLAND	100	3.926		Bisocled by PBE&G high-voltage transmission ROW, Existing use.  Over 50 % of lot incurrected by a determine basin essament. No access.
121 101 50 15	TMANHATTAN CRIVE:	150	3,700 3,612	1	Lot is already developed (Lutheran Social Ministries).  1.43 ac. per Tax Map. No street frontage.
99.01 4 153 1.01	5 CAMPUS DRIVE		3.301 3.295	-1	Approx. 0.6 scree per the Tax Map. Could be developed. 0.76 lot that is separated from other lots owned by same owner. The other lots are developed - reduce the lot size to just this lot. Could be developed.
153 1.01 133 1.00 35631 20	JACKSONYILE ROAD COLFAIN ROAD	38 Mi	3.250 3.253 7.851		Could be developed, SAME BLOCK & LOT AS #31 & #41 ABOVE Municipal property, Dedicated open space and SVM lot for Olde Mill Run development.
153 107	SINER ROAD	-89	2 804 2 722		SAME BLOCK & LOT AS #57 ABOVE, Asphie Plant.
105.02 8	AMHERST OR & SALEM RD	30	2.661		Preserved corn space (conservation easement RE: Tillinghast), On ROSI, Could be developed.
123.01	MT HOLLY ROAD	150	2,535	-	SAME BLOCK & LOT AS #44 ABOVE. Gould be developed.
99 1.01	4 CAMPUS DRIVE 1 TERRI LANE		2 338 2 273		2023 Apprival for Truck Service Shale, Could be developed. Could be developed. Could be developed.
105.03 24 196.01 4.74	AMHERST OR & SALEM RO	16G	2.269		Could be developed.  Municipal property. Dedicated open space and SVVM lot for Saddlebrook development.
#20 # 8,64	BLBOW LANE 8421 S ROUTE 130	150	2.100		Landlocked parcel. Part of Johnson's Specialized Towing. Fully developed house of vership site.
167 1 (r) 168 5 5 01	HECK IID & RT 100 203 RIVERWALX BLVO	160	2.072		SAME BLOCK & LOT AS #33 ÁBOVE. HILDO ripotry / Details judjande Municipal proparty, Well 89 sta.
123.01 3.01	ELBOW LAVE	160	183	4	Processing open space (conservation asserted RE: Tillinghast). On ROSI.
142.04 4 108.22 23	1906 NEOK ROAD TAULEY LAME	150 150	1750 1677		Developed with structure  Municipal property, Dedicated open space for Burlington Heights, Section 6 development.
101,11 4	1032 UACKEONVILLE HIDAD	150	1.601	-1	Could be developed.  SAME BLOCK & LOT AS #50 ABOVE.
10	RIVER ROAD	3	1540		SAME BLOCK & LOT AS #76 ABOVE. Not developable. Stream rate through the middle of preperty.
102 1.07	THEO COUNT REAR OF	18C	1/457	4	Municipal property. Dedicated open space for Hontage Place development. Contains a Sentrary PS and SWM Basin. Preserved ocen space (conservation essement RE: Tillinghast). On ROSI.
129.10 1	SHEEN HILL ROAD/TWP LINE SHIVE REAGE	180	0.000	1	Could be developed. Tax Maps indicate area is only 8 sc. DCA shows as 1.4  Municipial property. Dedicated open space for Royal Oaks development.
99.01 1	4460 S ROUTE 130 4420 S ROUTE 130		1,194		Approved for 60,000 5F in 2023 but developable Fully developed. Part of a car dealership.
110 1	RANCOCAS ROAD  600 RICE ROAD	150	1.000	=	Municipal property. Dedicated open spine & SWM for Royal Oaks development. SAME BLOCK & LOT As \$89 ABOVE. SAME BLOCK & LOT As \$89 ABOVE.
100.31 1	SUNSET ROAD RANGOCAS ROAD		0.921	-	SAME BLOCK & LOT AS #6 SAME BLOCK & LOT AS #28
112.01 6	PEARLOT TO RR SUNSET ROAD	-	0.801 0.827		BAME BLOCK & LOT AS #25 Developable
94 3 141.07 E-00	AND AND AND A MINER	1	0.797 0.797	+	Not developable. In PA4 - no weight for developable land  Landlocked Parcel
16 36 E 00	204 RIVERWALK BLVD	189	0.790	-1	Developable but in PA4 - no weight for developable land Pump Station Conent Based
153 1.8 0 146 4.06	N ROUTE 130	1	0.673	-	Sarre as #48 Developable
104.27 13 102 1,07	ALMONO ROAD THEO COURT REAR OF	15C	0.648	=	Open Space Same as #83
130 1.03 (78.03 59	OXMEAD ROAD OFF TALLERBALL ORIGIN	150	0.643		Developable No access, explands, open waters, open space?
35	ALONG NUTURNISH	156	0.500 0.500 0.575	- 1	SAME BLOCK AND LOT AS #25  Not developable - rear yard of existing SF home, no access  Not developable - long skinny for
100.00 78 8.00 8.00	DE RIVERWALK BLVD	150 150	0.572 0.870		Open Space Pump Station
130 0 147,14 13	071 OXMEAD ROAD DALLOP DIOVE	150	0.000	-1-	Developable but in PA4 and PA5 - no veight for developable land  Not Developable. Narrow for with limited access and stream in center of lot
93 16 148.01 1	N ROUTE 130	1	0.542 0.523	$\pm$	Developable Developable
98.08 2 (add) 33	OFF ROUTE 130	190	0.498	-1-	Church Developable Developable Open Space, wetlands, email skinny parcel around existing residences
127.81 31 136.01 10	SANTON STREET	150 150	0.466 0.466	-	Opin space for TH community? Yes, refer to my copy.  Opin space
13001 113 160 103 29 30	SERVICIAL CARE SHE OULTY CARE WALL AVENUE	3	0.460	. 37	Not Developable. No access and significant wetlands Not Developable. No access
39 39 98.03 1	SHIVE PLACE	15C 1	0.380	-1-	Developabile Developabile Sarine as #113
100 115 O	COMEAD HOAD	150	0.90	- 1	Surre as #13 Surre as #48 Surre as #37
13612	WERKLINK!	160	0.347		Open Space

140	_3_	MILLIANE REAR LOT	38	0.343	1
8301	100	WALLAUFBUR	1 3	0.347	1 1
115	1.02	203 BURGET ROAD	150	0.541	1 1
170	0.17	113 CONHECTICAT DRIVE	16C	0.000	1 1
100	2.01	103 CHIEF WAY	160	0.70	
	1.04	CONNECTION DAVE	150	0.00	-
95.03	4	OFF ROUTE 130	- 1	0.260	1
-		The state of the s		0.100	_
1100.05	28	HAVERIDANE	150	0.276	10
109.05 140 140	3	MILL DATE REAL LIST	30	0.274	-
100		MALE DAVID REAL DIOT			
-	-	ACINGONYME HOLD	- 3	0.201	1
		LAYSE AYZHUE	150	0.586	
39	39	17TH & WALL AVE	150	0.246	1
120.01	5.21	118 KOSSEL ROAD	1	0.239	1.
119	12.03	2113 RANCOCAS ROAD	1 0	0.189	10
- 24		RAILROAD AREA & RIVEN	4 7	0.183	1 1
30	29	20TH & ROUDINGT	1	0.178	1
133	1.02	JACKSON/ELE BOATS	30	0.171	
138	3	TOOK JACKSCHIVELE HOAD	1857	0.182	++
	100	JIR DULTY LAKE	100	0.00	_
153			36	9.46	
110		BANKAKIAS ROME	160	0.144	
196.03	_3	BEARINE RIGHTS	1	0.158	
10000	1.01	HIVEH ROAD	-1-	0.120	
- 101	3	FEARLST TORK	7 1	1917	
11800		OFFICARRY CROLE	150	0.123	1
155	1.11	RIVER ROAD	30	0.12	1 1
- 0	_	RIVER ROAD STR & WOOD ST	160	210	1
70431	-	AT WALHUT SHAVE	-	0.122	++
			100	2,115	-
137	_4_	1900 RIVER ROAD		0.100	
T-0.02	1.01	1518 JACKSON/SLERD REAR			1 - 1
105	: 5.01	SALEM ROAD		6.167	
123	_5	600 HICK HOAD	30	0.100	1
138	7.01	1001 OXMEAD ROAD	1	0.102	1
1 2427	12	AL MONTH SCHOOL	750	0.000	-
- 135	470	415 POUNTAIN AVENUE	90		
100		411 POUNTAIN AVENUE	100	0.000	-
144.10	100	WARDEN WAY	100	0.008	
	8.0	1110 COLUMBUS ROAD	130	0.008	1.5
10512		ANNERST DRIVE		0.000	- 1
99.01	- 4	5 CAMPUS DRIVE	-1	0.088	1
144	3.02	THIS DOLUMBUS ROAD	160	Q.06f	1
105	101	ELECTRIC AND		E 666	
129.01		111 CONNOR COURT	160	0.003	+
			- 100	0.001	-
123.01		ALONG AUTURNINE	189	0.001	
135	4.05	411 SOUNTAIN AVENUE	150	6 078	1 1
- B.	7.01	163 CHEEKSIGE WAY	100	8.077	1 2
130	7.0	1001 OXMEAD ROAD	1	0.075	1
	- 3"	PEARLETTO RR		0.074	1
100	- 0	107T OXMEAD ROAD		0.073	-
- 30	29	20TH & BOUDINGT		0.068	-
130	3.01	JACKSONVILLE ROAD			
			36	0.064	_1
146	5	604 NECK ROAD	150	0.063	- 1
104.22	13	ALMOND ROAD	100	C CHILD	1
153		BIVEH ROAD	-38	0.000	
181	3 1	PEARLSTTORK	3. 1	0.063	1
	_				_

135 155