

Amended Housing Plan Element and Fair Share Plan



City of Wildwood

4th Round

2026

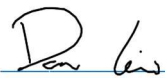
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Introduction

The City of Wildwood is a well-established coastal community located in southeastern Cape May County. Covering approximately 1.3 square miles, the City is situated on a barrier island along the Atlantic Ocean and is bordered by the municipalities of North Wildwood to the north, Wildwood Crest to the south, and West Wildwood across the inland waterways to the west. Its location makes it a key destination within the Jersey Shore region, with a distinct blend of residential neighborhoods, tourism-driven commerce, and year-round community activity.

The City has prepared this Housing Plan Element and Fair Share Plan (“HEFSP”) in accordance with the requirements set forth in the Fair Housing Act, N.J.S.A. 52:27D-301, et. seq., as amended by A4/S50 (Senate Bill No. 50) (hereinafter “Amended FHA”), including the methodology and procedures established for the Fourth Round of affordable housing obligations. In response to the requirements of the Amended FHA and the creation of a new quasi-administrative and legal procedure for processing municipal affordable housing plans, the Administrative Office of the Courts issued Directive #14-24 (“AOC Directive #14-24”), which also creates requirements for the filing of municipal HEFSP’s with the Affordable Housing Dispute Resolution Program (“the Program”) by the June 30, 2025 statewide deadline.

While the Amended FHA does not require municipalities to adopt a Fair Share Plan, doing so provides protection from exclusionary zoning litigation, including builder’s remedy lawsuits. Similarly, the New Jersey Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.) does not mandate a Housing Plan Element, but it is a prerequisite for adopting or amending zoning ordinances. Together, the FHA and MLUL require that any adopted Housing Element address the municipality’s present and prospective housing needs, with particular attention to low- and moderate-income housing. In accordance with the Fair Housing Act (N.J.S.A. 52:27D-310), as implemented through the Fourth Round methodology and procedures established in A4/S50 (P.L. 2024, c. ___), the Housing Element shall include at minimum the following components:

1. An inventory of the municipality’s housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low- and moderate-income households and substandard housing capable of being rehabilitated. In conducting this inventory, the municipality shall have access, on a confidential basis, to all necessary property tax assessment records and information in the assessor’s office, including but not limited to property record cards.
2. A projection of the municipality’s housing stock for the next ten years, including the probable future construction of low- and moderate-income housing, taking into account construction permits issued, approved applications for development, and anticipated residential development of lands.
3. An analysis of the municipality’s demographic characteristics, including but not limited to household size, income level, and age.
4. An analysis of the existing and projected employment characteristics within the municipality.

5. A determination of the municipality’s present and prospective fair share obligation for low- and moderate-income housing, and an assessment of its capacity to accommodate those housing needs, in accordance with the methodologies outlined in A4/S50.
6. A consideration of lands and structures most appropriate for the development, conversion, or rehabilitation of low- and moderate-income housing, including consideration of sites owned by or offered by developers committed to providing affordable housing.
7. A map of all sites designated for the production of low- and moderate-income housing and a listing that includes the owner, acreage, lot, and block for each site.
8. The location and capacity of existing and proposed water and sewer lines and facilities relevant to the designated housing sites.
9. Copies of applications or approvals required for amendments or consistency determinations with applicable area-wide water quality management plans, including wastewater management plans.
10. A copy of the most recently adopted master plan, and where required, the immediately preceding adopted master plan.
11. For each designated site, a copy of the New Jersey Freshwater Wetlands maps where available. If unavailable, appropriate copies of the National Wetlands Inventory maps provided by the U.S. Fish and Wildlife Service shall be submitted.
12. A copy of the appropriate United States Geological Survey (USGS) topographic quadrangle maps for each designated site.
13. Any other documentation reasonably necessary to support review and evaluation of the Housing Element under the standards applicable to the Fourth Round.

The City of Wildwood received second round certification from the Council on Affordable Housing (COAH) on April 4, 2001. The City has previously and continues to operate a housing rehabilitation program as part of a consent order issued by the Superior Court Docket No: CPM-L-00013-08. Additionally, the City has adopted zoning ordinances that established a set-aside for affordable housing in inclusionary developments and has recently developed age-restricted affordable housing units.

The City adopted its Fourth Round HEFSP on June 9, 2025 and submitted same to the Program in accordance with the amended FHA. The City received challenges to its HEFSP by the statutory deadline from Mount Olive Community Development Corp. and Fair Share Housing Center (“FSHC”). Through the Program’s mediation phase, the City and the challengers were able to settle, resulting in a Consent Order, which was entered by the Court on January 16, 2026. The agreed upon settlement required that the City amend its Fourth Round HEFSP, resulting in this amended HEFSP.

Inventory of Housing Stock

Age of Housing Stock

The majority of the City’s housing stock is older, with a third of the housing stock built before 1939 (30.3%). Almost half of the housing stock is over 50 years old, and since 2010, only 294 housing units have been constructed. In contrast, homes in Cape May County overall tend to be newer, with only 13.3% built before 1939.

| Table 1 - Housing Characteristics | | | | |
|--|--------------------------------------|---------------------------------------|--|---|
| Construction Time | Wildwood City Number of Units | Wildwood City Percent of Units | Cape May County Number of Units | Cape May County Percent of Units |
| Prior to 1939 | 2,005 | 30.3% | 13,262 | 13.3% |
| 1940 to 1949 | 235 | 3.6% | 3,911 | 3.9% |
| 1950 to 1959 | 583 | 8.8% | 9,406 | 9.4% |
| 1960 to 1969 | 410 | 6.2% | 9,389 | 9.4% |
| 1970 to 1979 | 558 | 8.4% | 13,746 | 13.8% |
| 1980 to 1989 | 676 | 10.2% | 17,214 | 17.3% |
| 1990 to 1999 | 299 | 4.5% | 9,626 | 9.7% |
| 2000 to 2009 | 1,549 | 23.4% | 15,407 | 15.5% |
| 2010 to 2019 | 243 | 3.7% | 6,668 | 6.7% |
| 2020 or later | 51 | 0.9% | 996 | 1.0% |
| Total | 6,619 | 100% | 99,625 | 100% |

Source: 2023 American Community Survey, DP04 5-year Estimates

Condition of Housing Stock

This plan utilizes the 2023 American Community Survey 5-Year Estimates, where available, to estimate the number of substandard housing units in Wildwood that are occupied by low- and moderate- income households. ACS data considers the following factors to estimate the number of substandard housing units:

- Persons per room: 1.01 or more persons per room is an index of overcrowding.
- Plumbing facilities: Inadequate plumbing facilities is indicated by either a lack of exclusive use of plumbing facilities or incomplete plumbing facilities.
- Kitchen facilities: Inadequate facilities are indicated by shared use of a kitchen or the lack of a sink with piped water, a stove or a refrigerator.

Using the above indicators, the table below shows the number of substandard occupied housing in the City of Wildwood.

| Table 2 Condition of Housing Stock | | |
|--|-------|------------|
| | Total | Percentage |
| Number of Persons per Room | | |
| ● 1.01 or more | 62 | 2.4% |
| Plumbing Facilities | | |
| ● Units Lacking Complete Plumbing Facilities | 0 | 0.0% |
| Kitchen Equipment | | |
| ● Lacking Complete Kitchen Facilities | 0 | 0.0% |
| Total Occupied Units | 2,609 | 100% |
| Source: 2023 American Community Survey 5-year Estimates | | |

The 2023 American Community Survey (ACS) indicators were used to estimate the number of substandard housing units in the City of Wildwood. As shown in Table 2, no housing units meet the DCA’s criteria for deficient housing, which includes units that are overcrowded, lack complete plumbing or kitchen facilities, or were built more than 50 years ago. In accordance with the methodology outlined in A4/S50 and implemented by the New Jersey Department of Community Affairs, this figure is used directly to calculate present need. No additional adjustments based on income levels or duplicative household factors were applied, in line with the standardized present need calculation now utilized statewide.

Purchase or Rental Value of Housing Stock

According to the 2023 ACS, the median value of housing in Wildwood was \$361,200, while the median value of a home in Cape May County was almost 10 percent higher, at \$395,000. Most of the homes in both Wildwood City and Cape May County were in the value range of \$300,000-\$499,999. Table 3 shows the percentage of housing units in each value category.

| Table 3 | | | | |
|--|----------------------|-------------------|------------------------|-------------------|
| Value of Owner-Occupied Units | Wildwood City | | Cape May County | |
| Value | Units | Percentage | Units | Percentage |
| Less than \$50,000 | 0 | 0% | 1,168 | 3.3% |
| \$50,000 to \$99,999 | 0 | 0% | 587 | 1.7% |
| \$100,000 to \$149,999 | 11 | 1.1% | 552 | 1.6% |
| \$150,000 to \$199,999 | 39 | 4.0% | 2,169 | 6.2% |
| \$200,000 to \$299,999 | 235 | 24.1% | 6,656 | 18.9% |
| \$300,000 to \$499,999 | 433 | 44.5% | 11,899 | 33.8% |
| \$500,000 to \$999,999 | 252 | 25.9% | 8,585 | 24.4% |
| \$1,000,000 or more | 4 | 0.4% | 3,564 | 10.1% |
| Total | 974 | 100% | 35,180 | 100% |
| Median (dollars) | \$361,200 | | \$395,000 | |
| Source: 2023 American Community Survey, DP04 5-year Estimates | | | | |

For rental units, the median gross rent was \$1,255 in Wildwood City compared to \$1,345 in Cape May County. Of the 1,559 occupied rental units approximately 33.7% of the City’s rental units were identified in the \$1,000-\$1,499 category, compared to 29.3% for the County. The largest concentration of the City and County rental unit pricing was identified in this category.

| Table 4 | | | | |
|--|----------------------|-------------------|------------------------|-------------------|
| Cost of Rent | Wildwood City | | Cape May County | |
| Occupied Units Paying Rent | Units | Percentage | Units | Percentage |
| Less than \$500 | 90 | 5.8% | 466 | 5.3% |
| \$500-\$999 | 406 | 26.0% | 1,981 | 23.5% |
| \$1,000-\$1,499 | 526 | 33.7% | 2,475 | 29.3% |
| \$1,500-\$1,999 | 275 | 17.6% | 2,168 | 25.7% |
| \$2,000-\$2,499 | 242 | 15.5% | 1,097 | 13.0% |
| \$2,500-\$2,999 | 20 | 1.3% | 180 | 2.1% |
| \$3,000 or more | 0 | 0.0% | 199 | 1.2% |
| No Rent Paid | 76 | - | 743 | - |
| Total Occupied Units Paying Rent | 1,559 | 100.0% | 8,446 | 100.0% |
| Median (dollars) | \$1,255 | | \$1,345 | |
| Source: 2023 American Community Survey, DP04 5-year Estimates | | | | |

Occupancy Characteristics and Types of Housing Units

Out of the 6,619 total housing units in the City, 2,609 were occupied (39.4% percent). Of those occupied housing units, most were renter-occupied (1,635 or 62.7%) while over a third, or 37.3%, were owner-occupied. This reflects Wildwood City as primarily a beach community with a large number of summer rentals, in contrast to Cape May County which is primarily owner-occupied (79.3%).

| Table 5a Owner Occupied/Rentals and Total Occupied Units | | | | |
|--|----------------------|------------|------------------------|------------|
| | Wildwood City | | Cape May County | |
| | Total | Percentage | Total | Percentage |
| Housing Units | | | | |
| • Total Number of Housing Units | 6,619 | 100% | 99,625 | 100% |
| Occupied Units | | | | |
| • Total Number of Occupied Housing Units | 2,609 | 39.4% | 44,369 | 44.5% |
| Owner-Occupied | | | | |
| • Total Number of Owner-Occupied Housing Units | 974 | 37.3% | 35,180 | 79.3% |
| Renter-Occupied | | | | |
| • Total Number of Renter-Occupied Housing Units | 1,635 | 62.7% | 9,189 | 20.7% |
| Source: 2023 American Community Survey, DP04 5-year Estimates | | | | |

The 2023 ACS indicated that there were 6,619 housing units in Wildwood, which is shown in Table 5b. Single family attached units consist of approximately a third (32.2%) of the City’s housing stock. The second largest category was identified as single-family detached units, which represented 22.3 percent. In contrast, over half of the County’s housing stock is single family housing.

| Table 5b | | | | |
|---------------------------|-----------------------------|-------------------|-----------------------------|-------------------|
| Housing Units | | | | |
| | Wildwood City | | Cape May County | |
| Units in Structure | Numbers in Structure | Percentage | Numbers in Structure | Percentage |
| 1 - Unit Detached | 1,476 | 22.3% | 52,140 | 52.3% |
| 1 - Unit Attached | 2,129 | 32.2% | 25,363 | 25.5% |
| 2 Units | 725 | 11.0% | 6,666 | 6.7% |
| 3 or 4 Units | 931 | 14.1% | 3,157 | 3.2% |
| 5 to 9 Units | 572 | 8.6% | 3,093 | 3.1% |
| 10 to 19 Units | 298 | 4.5% | 1,955 | 2.0% |
| 20 Units or more | 488 | 7.4% | 4,157 | 4.2% |
| Mobile Home | 0 | 0.0% | 3,092 | 3.1% |
| Other | 0 | 0.1% | 2 | 0.0% |
| Total | 6,619 | 100% | 99,625 | 100% |

Source: 2023 American Community Survey, DP04 5-year Estimates

Units Affordable to Low- and Moderate- Income Households

Low-income households are defined as those earning less than or equal to 50 percent of a regional median income. Moderate income households earn more than 50 percent of regional median income, but less than 80 percent of regional median income. Formerly issued by COAH, the Affordable Housing Professionals of New Jersey (AHPNJ) publish annual income limits, which define low- and moderate- income limits based on household size from one (1) occupant up to eight (8) persons per household. Housing units are to be priced to be affordable to households who could reasonably be expected to live within the housing units. For example, the current Affordable Housing rules require that an efficiency unit be affordable to a household of one (1) as shown below in Table 6.

| Table 6 | | | | | |
|---|----------|-----------|-----------|-----------|-----------|
| 2024 AHPNJ Income Limits for Cape May County | | | | | |
| | 1 Person | 2 Persons | 3 Persons | 4 Persons | 5 Persons |
| Median Income | \$68,852 | \$73,770 | \$78,688 | \$88,524 | \$98,360 |
| Moderate (80% of Median) | \$55,081 | \$59,016 | \$62,950 | \$70,819 | \$78,688 |
| Low (50% of Median) | \$34,426 | \$36,885 | \$39,344 | \$44,262 | \$49,180 |
| Very Low (30% of Median) | \$20,655 | \$22,131 | \$23,606 | \$26,557 | \$29,508 |

Source: April 2024, AHPNJ 2024 Affordable Housing Regional Income Limits

To be considered affordable, an owner-occupied unit should not require more than 28 percent of a household’s gross income to cover principal, interest, taxes, and insurance, following a minimum down payment of five percent. For rental units, affordability is defined as a household paying no more than 30 percent of its gross income on rent and utilities. Based on the 2023 ACS data,

approximately 34.2% of owner-occupied households in Wildwood are cost-burdened, meaning they pay more than 30% of their gross income toward housing costs, while 64.8% of renter households are cost burdened. This high rate of housing cost burden reflects a significant affordability challenge for both renters and homeowners in the City.

| Table 7a Wildwood City Monthly Housing Costs as a Percentage of Household Income in Owner-Occupied Units | | |
|---|---------------|-------------------|
| Percentage of Income | Number | Percentage |
| Less than 20% | 281 | 40.4% |
| 20% to 29% | 177 | 25.4% |
| 30% or more | 238 | 34.2% |
| Total | 696 | 100% |
| Not computed | 0 | X |
| Source: 2023 American Community Survey, DP04 5-year Estimates | | |

| Table 7b Wildwood Monthly Housing Costs as Percentage of Household Income in Rental Units | | |
|--|---------------|-------------------|
| Percentage of Income | Number | Percentage |
| Less than 15% | 78 | 5.1% |
| 15% to 19.9% | 77 | 5.0% |
| 20% to 24.9% | 158 | 10.3% |
| 25% to 29.9% | 223 | 14.6% |
| 30% to 34.9% | 184 | 12.0% |
| 35% or more | 807 | 52.8% |
| Total | 1,527 | 100% |
| Not computed | 108 | (X) |
| Source: 2023 American Community Survey, DP04 5-year Estimates | | |

Projected Housing Stock

Between 2013 and 2023, Wildwood issued building permits for 399 housing units. During the same time period, the City also issued permits to demolish 137 units, which is shown below in Table 8.

| Table 8 Dwelling Units Authorized | | | |
|--|--|--------------------------------|--------------------|
| Year | Residential Building Permits Issued | Residential Demolitions | Total Added |
| 2013 | 8 | 7 | 1 |
| 2014 | 5 | 11 | -6 |
| 2015 | 8 | 7 | 1 |
| 2016 | 6 | 3 | 3 |
| 2017 | 14 | 1 | 13 |
| 2018 | 7 | 14 | -7 |
| 2019 | 37 | 13 | 24 |
| 2020 | 18 | 26 | -8 |
| 2021 | 73 | 19 | 54 |
| 2022 | 116 | 23 | 93 |
| 2023 | 107 | 13 | 94 |
| Total | 399 | 137 | 262 |

Source: New Jersey Department of Community Affairs, Division of Codes and Standards

Municipality’s Demographic Characteristics

Wildwood has generally experienced population decline over the past seven decades, with the exception of two periods of population increase between 1970 and 1980 and 1990 to 2010. While the pace of population decline has slowed in recent decades, the City’s population has continued to rise modestly. According to long-range demographic projections. The table below summarizes historical population trends and future projections for the City from 1950 through 2023.

| Table 9 Wildwood City Population Characteristics 1950-2023 | | | | | | |
|---|----------------------|--------------------------|--------------------------|------------------------|--------------------------|--------------------------|
| Year | Wildwood City | | | Cape May County | | |
| | Population | Population Change | Percentage Change | Population | Population Change | Percentage Change |
| 1950 | 5,475 | – | – | 37,131 | - | - |
| 1960 | 4,690 | -785 | -14.3% | 48,555 | 11,424 | 30.77% |
| 1970 | 4,110 | -580 | -12.4% | 59,554 | 10,999 | 22.65% |
| 1980 | 4,913 | 803 | 19.5% | 82,266 | 22,712 | 38.14% |
| 1990 | 4,611 | -302 | -6.1% | 95,089 | 12,823 | 15.59% |
| 2000 | 4,718 | 107 | 2.3% | 102,326 | 7,237 | 7.61% |
| 2010 | 5,325 | 607 | 12.9% | 97,265 | -5,061 | -4.95% |
| 2020 | 5,157 | -168 | -3.1% | 95,263 | -2,002 | -2.06% |
| 2023 | 5,140 (est.) | -17 | -0.3% | 94,610 | -653 | -0.69% |

Sources: US Census, New Jersey Department of Labor and South Jersey Transportation Planning Authority

The age distribution in Wildwood City reflects a somewhat younger population compared to Cape May County overall, with a median age of 47.7 in Wildwood City and 51.5 in Cape May County. with notable shifts over the past decade. As shown in Table 10, in Wildwood City the share of residents aged 65 and over was lower than Cape May County, or 17.8% compared to 28.6%. Overall, these changes suggest that while Wildwood City is aging, it is doing so at a slower pace than the county and continues to support a more balanced age distribution, particularly among working-age residents in the 45-64 age category.

| Table 10 Population Comparison by Age | | | | |
|--|-------------------------------|-------------------------------|---------------------------------|---------------------------------|
| Age Group | Wildwood City 2013 | Wildwood City 2023 | Cape May County 2013 | Cape May County 2023 |
| Under 5 | 6.9% | 3.7% | 4.7% | 4.3% |
| 5 to 14 | 8.9% | 11.2% | 10.2% | 10.0% |
| 15 to 24 | 15.7% | 10.5% | 11.8% | 9.4% |
| 25 to 44 | 29.6% | 20.5% | 19.9% | 19.8% |
| 45 to 64 | 22.8% | 36.2% | 31.4% | 27.9% |
| 65 and over | 16.2% | 17.8% | 22.2% | 28.6% |
| Total | 5,269 | 5,140 | 96,684 | 95,236 |
| Median Age | 36.1 | 47.7 | 47.7 | 51.4 |

Source: 2023 American Community Survey, DP05 5-year Estimates

Wildwood City presents a more mixed economic picture, with lower incomes compared to the County. Almost a fifth (21.3%) of households in Wildwood City earn between 0-\$24,999 compared to 11.7% in the County. The 2023 American Community Survey reports a median household income of \$51,996, which is below the county median of \$88,046. Approximately 8.1% of households earn \$200,000 or more, and a combined 23.8% of households earn above \$100,000 annually in Wildwood City. This diversity in income brackets reflects the city's blend of long-term residents, seasonal economic influences, and a mix of housing types that contribute to a dynamic and economically varied community. A distribution of households by income for Wildwood and Cape May County are presented below in table 11.

| Table 11 Households by Income | | |
|--|----------------------|------------------------|
| Income Level | Wildwood City | Cape May County |
| Less than \$10,000 | 4.3% | 3.3% |
| \$10,000-\$14,999 | 7.5% | 3.3% |
| \$15,000-\$24,999 | 9.5% | 5.1% |
| \$25,000-\$34,999 | 10.0% | 6.8% |
| \$35,000-\$49,999 | 16.8% | 9.6% |
| \$50,000-\$74,999 | 15.1% | 14.7% |
| \$75,000-\$99,999 | 13.0% | 13.4% |
| \$100,000-\$149,999 | 7.2% | 18.5% |
| \$150,000-\$199,999 | 8.5% | 10.9% |
| \$200,000 or more | 8.1% | 14.4% |
| Median Household Income | \$51,996 | \$88,046 |

Source: 2023 American Community Survey, DP03 5-year Estimates

The 2023 ACS indicated that there were 2,609 households in the City. Approximately 41.7% of the City’s households were classified as married-couple households. The second largest household type was identified as female householder, no spouse and partner present, which represented approximately 26.9% of the City’s total households. See table 12.

| Table 12 Household by Type | | |
|--|---------------|-------------------|
| Household Type | Number | Percentage |
| Total Occupied Households | 2,609 | 100% |
| Married-couple Households | 1,090 | 41.7% |
| Cohabiting couple family | 274 | 10.5% |
| Female householder, no spouse and partner present | 704 | 26.9% |
| > Female householder living alone | 456 | 17.4% |
| Male householder, no spouse and partner present | 541 | 20.7% |
| > Male householder living alone | 463 | 17.7% |

Source: 2023 American Community Survey, B11012 5-year Estimates

Employment Characteristics

Of the 2,406 employed residents in the City, approximately 88.8% worked in the private sector. The second largest category was represented by government workers. See table 13.

| Table 13 Classification of Workers | | |
|---|---------------|-------------------|
| Class | Number | Percentage |
| Private Wage and Salary | 2,137 | 88.8% |
| Government Workers | 164 | 6.8% |
| Self Employed | 95 | 3.9% |
| Unpaid Family Workers | 10 | 0.4% |
| Total | 2,406 | 100% |

Source: 2023 American Community Survey , DP03 5-year Estimates

An analysis of the employed workforce indicated that Wildwood employees work in a broad array of economic sectors. The highest concentration of workers, 27%, are employed in the arts, entertainment, recreation, accommodation, and food services employment sectors, reflecting the City’s proximity to the shore and location as a vacation destination. The City’s workforce sector data is shown below in table 14.

| Table 14 Workforce by Sector | | |
|--|--------------------------------|------------------------------------|
| Sector | Number of Employees | Percentage of Workforce |
| Agriculture, Forestry, Fishing and Hunting, and Mining | 0 | 0.0% |
| Construction | 264 | 11.0% |
| Manufacturing | 40 | 1.7% |
| Wholesale trade | 165 | 6.9% |
| Retail Trade | 420 | 17.5% |
| Transportation and Warehousing, and Utilities | 31 | 1.3% |
| Information | 0 | 0.0% |
| Finance, Insurance & Real Estate | 89 | 3.7% |
| Professional, Scientific, Management, Administrative, and Waste Management Services | 238 | 9.9% |
| Educational, Health, and Social Services | 240 | 10.0% |
| Arts, Entertainment, Recreation, Accommodation and Food Services | 649 | 27.0% |
| Other Services | 209 | 8.7% |
| Public Administration | 61 | 2.5% |
| Total | 2,406 | 100% |
| Source: 2023 American Community Survey, DP03 5-year Estimates | | |

The workforce occupation characteristics in Wildwood were compared to those of Cape May County. As indicated in Table 15, the occupational characteristics of the City’s residents differs from those of workers residing in Cape May County. While over a quarter of City residents are employed in the arts, entertainment, recreation, accommodation, and food services employment sectors; a quarter of County residents are employed in the educational, health and social services occupation sectors. Table 15 reflects the City’s and County’s occupational characteristics.

| Table 15 Occupational Characteristics | | |
|--|----------------------------------|---|
| Sector | Wildwood (Percentage) | Cape May County (Percentage) |
| Agriculture, Forestry, Fishing and Hunting, and Mining | 0.0% | 1.3% |
| Construction | 11.0% | 8.8% |
| Manufacturing | 1.7% | 4.4% |
| Wholesale trade | 6.9% | 2.2% |
| Retail Trade | 17.5% | 10.4% |
| Transportation and Warehousing, and Utilities | 1.3% | 3.5% |
| Information | 0.0% | 1.5% |
| Finance, Insurance & Real Estate | 3.7% | 7.0% |
| Professional, Scientific, Management, Administrative, and Waste Management Services | 9.9% | 9.6% |
| Educational, Health, and Social Services | 10.0% | 25.2% |
| Arts, Entertainment, Recreation, Accommodation and Food Services | 27.0% | 14.3% |
| Other Services | 8.7% | 4.2% |
| Public Administration | 2.5% | 7.4% |
| Total | 100% | 100% |
| Source: 2023 American Community Survey, DP03 5-year Estimates | | |

In addition, in order to understand what implications this employment data has for the City and understand what the employment field and area trends are for Wildwood City and Cape May County, the New Jersey Department of Labor (NJDOLE) has prepared projections, which analyze the expected increase or decrease in a particular employment sector by the year 2032. This data has been summarized and is illustrated within table 16.

| Table 16 Cape May County Projected Employment | | | | |
|---|-----------------------------------|--------------------------------------|---------------------------|----------------|
| Industry | 2022 Actual Employment | 2032 Projected Employment | Numeric Change | Outlook |
| Accommodation and Food Services | 10,787 | 10,914 | 127 | Stable |
| Administrative and Support and Waste Management and Remediation Services | 1,410 | 1,443 | 3 | Stable |
| Arts, Entertainment and Recreation | 1,974 | 2,191 | 217 | Growing |
| Construction | 2,708 | 2,886 | 178 | Growing |
| Educational Services | 3,005 | 3,174 | 169 | Growing |
| Finance and Insurance | 932 | 839 | -93 | Declining |
| Government | 4,913 | 4,869 | -44 | Declining |
| Health Care and Social Assistance | 4,554 | 4,727 | 173 | Stable |
| Information | 184 | 176 | -8 | Declining |
| Management of Companies and Enterprises | 159 | 159 | 0 | Stable |
| Manufacturing | 1,085 | 1,117 | 32 | Stable |
| Other Services (except Government) | 1,926 | 2,040 | 114 | Growing |
| Professional, Scientific, and Technical Services | 1,170 | 1,223 | 53 | Stable |
| Real Estate and Rental and Leasing | 876 | 895 | 19 | Stable |
| Retail Trade | 6,948 | 6,993 | 45 | Stable |
| Transportation and Warehousing | 306 | 313 | 7 | Stable |
| Utilities | 85 | 74 | -11 | Declining |
| Wholesale Trade | 669 | 691 | 22 | Stable |
| Total (All Industries) | 43,691 | 44,724 | 1,033 | Growing |
| Source: New Jersey Department of Labor and Workforce Development | | | | |

The most significant job growth is projected in arts, entertainment and recreation, construction, and health care and social assistance. These trends reflect shifting demands in service-oriented and infrastructure-supportive industries, and a portion of these job gains will likely impact the Wildwood City workforce either directly or indirectly, supporting economic opportunity in the region.

Analyses

Vacant Land Analysis

The City of Wildwood conducted a comprehensive Vacant Land Analysis (VLA) to assess its realistic development potential and identify land available to meet its affordable housing obligations. This assessment reviewed tax records, zoning designations, and physical site constraints such as wetlands, flood zones, and parcel size thresholds. All parcels listed in the ROSI (Recreation and Open Space Inventory) were excluded from the VLA due to their dedication for public recreation, natural preservation, or open space use. These include major beachfront areas like the Third and Second Ward Beaches and active recreational spaces such as Maxwell Field. These lands are not available for development due to their designation and use restrictions and therefore do not contribute to the City's developable acreage.

The City identified a number of parcels coded as vacant or underutilized in the MOD IV Tax Assessment data, as well as a consideration of lands that were most appropriate for construction of low- and moderate-income housing and of the existing structures most appropriate for conversion to or rehabilitation for such housing. Upon further inspection, all of these sites were determined to be unsuitable for development due to severe environmental constraints or insufficient lot size. Many properties were less than 0.83 acres and/or fell within regulated areas under DEP and FEMA jurisdiction. As such, they were excluded from the analysis of developable land. None of the reviewed parcels met the minimum threshold to support development at 6 units per acre, even under optimal assumptions, and no sites yielded any unconstrained acreage. Based on the results of the VLA, the City of Wildwood's total Realistic Development Potential (RDP) for the City's Third and Fourth Round prospective need is 0 units.

Analysis of Multigenerational Family Continuity

The 2024 FHA requires an analysis of the extent to which municipal ordinances and other local factors advance or detract from the goal of preserving multigenerational family continuity as expressed in the recommendations of the Multigenerational Family Housing Continuity Commission, adopted pursuant to paragraph (1) of subsection f. of section 1 of P.L.2021, c. 273 (C.52:27D-329.20). The Commission has the primary goal of enabling senior citizens to reside at the homes of their extended families, thereby preserving and enhancing multigenerational family continuity.

A review of the City's ordinances indicates that there are no ordinances that would specifically create a detraction from meeting the Commission's goal of enabling senior citizens to reside at the homes of their extended families. Furthermore, the City's ordinances permit accessory dwelling units within the R-1, R-2, R-3, RM, WR, WR-1, and MC-R Districts within a single-family dwelling on a lot which meets all the conditional requirements of the ordinance, thus allowing senior citizens to live within close proximity to their extended families and still maintain autonomy over their dwelling unit.

Wildwood’s affordable housing ordinance requires at least 20% of all affordable housing units within inclusionary developments to be 3 bedroom units; and the City contains senior buildings where adult children of seniors can reside in a unit. Therefore, Wildwood City ordinances and local factors advance the multigenerational continuity goal.

Analysis of consistency with the State Development and Redevelopment Plan

The City’s Fourth Round Housing Element and Fair Share Plan is consistent with the 2001 State Development and Redevelopment Plan (SDRP) as the approved and proposed projects outlined in the Fair Share Plan provide ample opportunity for the construction of affordable housing. All of Wildwood City is designated as Planning Area 5B Environmentally Sensitive Barrier Island. Pursuant to the SDRP, housing in PA5B areas should “Provide for housing choices through redevelopment, new construction, rehabilitation, and adaptive reuse. Preserve the existing housing stock through maintenance, rehabilitation and flexible regulation.”

The development of limited but targeted affordable housing in PA5B is consistent with the overall State Development and Redevelopment Plan goal to direct redevelopment and growth into existing “centers” on the barrier islands where infrastructure can support the development and services such as open space, retail shopping, public transportation, schools are within walking distance. Adequate sewer and water capacity are available for development identified in this plan in Wildwood City. Wildwood City is located within CAFRA, and all development applications that are subject to CAFRA regulations and processes will be followed as required.

Fair Share Plan

Satisfaction of the Rehabilitation Obligation

PRESENT NEED (REHABILITATION OBLIGATION) – 15 UNITS

The City of Wildwood approved binding resolution 32-1-25 on January 22, 2025 that committed the City to a present need (rehabilitation) obligation of 15 units. The City maintains an active rehabilitation program administered by Triad Associates and will continue to offer this program to both owner-occupied and rental housing units. This rehabilitation program was approved by the Court in the 2012 Consent Order.

Satisfaction of the Prior Round Obligation

PRIOR ROUND (1987-1999) - 0 UNITS – COAH-determined Urban Aid Municipality Status

The City has a Prior Round obligation of 0 units per the Consent Order signed by the Honorable J. Christopher Gibson on December 10, 2012 after a duly-noticed Fairness Hearing. Per the Master’s Report prepared prior to the Fairness Hearing, the City and the Plaintiff, Mount Olive Community Development Corporation, with input from Fair Share Housing Center, “[a]lthough COAH assigned the City a 113-unit prior round obligation in 2008, COAH had previously determined that the City had a zero (0) prior round new construction obligation in both the first and second rounds based on Wildwood’s status as an ‘urban aid’ municipality and other criteria. . . . In the 2008 regulations, it appears that COAH had not accounted for the COAH board’s decisions and COAH’s consultant’s prior findings.”

Satisfaction of the Third Round Obligation

THIRD ROUND OBLIGATION (1999-2025) – 151 UNITS – Jacobsen Decision Determination

Per the Consent Order signed by the Hon. Judge J. Christopher Gibson on December 10, 2012, the Court ordered that the City “shall have no further obligation to engage in Third Round (post-1999) fair share housing planning or adopt a [HEFSP] that addresses Third Round (post-1999) obligations until such time as the standards with which [the City] must comply have been established.” Within that order, the City was credited with 13 new special needs credits to be applied to its future affordable housing obligation at the Lily Mae Apartments at Block 145, Lots 4.02 and 5.

In accordance with the Amended FHA, the City has a Third Round prospective need obligation of 151 units, as set forth in the “Jacobsen Decision,” In re Municipality of Princeton, No. MER-L-1550-15 & MER-L-1561-15, 2018 LEXIS 1241 (N.J. Super. Ct. March 8, 2018). N.J.S.A. 52:27D-304.3

Satisfaction of the 4th Round Obligation

4TH ROUND OBLIGATION 48

Pursuant to the requirements of the Amended FHA, in October 2024, DCA determined that the City’s Fourth Round prospective need obligation is 48 units, which was accepted by the City in its binding resolution, adopted on January 22, 2025. As noted previously in this document, Wildwood has applied a vacant land adjustment to the City’s Third and Fourth Round prospective need obligation, which establishes an RDP of 0 units. However, the Amended FHA requires that any municipality that receives an adjustment of its prospective need obligations for the fourth round based on a lack

of vacant land shall as part of the process of adopting and implementing its housing element and fair share plan identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25 percent of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so (hereinafter referred to as the “25 Percent Requirement”).

Due to the ambiguity of the 25 Percent Language in the Amended FHA, there are at least three interpretations of what the “adjusted number” referred to in the statute means for purposes of calculating the 25%; however, regardless of what the 25 Percent Language is adjudicated to be by the Program and/or an appellate ruling from the Courts, the City of Wildwood not only has enough credits to satisfy the highest calculation of this statutory requirement, but it also has adopted overlay zoning that will capture additional affordable units as the City redevelops over time.

Per the 2012 Consent Order, the City is allowed to credit 13 units from the Lily Mae Apartments toward future obligations. Since the City has a combined RDP of zero for the Third and Fourth Round, the 13 Lily Mae apartments will be counted toward the City’s “25 Percent” calculation, however that may be adjudicated.

| Compliance Mechanism | Rental or Sale | Supportive/ Special Needs | Family or Age Restricted | Units | Bonus Credits | Total Credits |
|----------------------|----------------|---------------------------|--------------------------|-------|---------------|---------------|
| Lily Mae | Rental | Special Needs | Family | 13 | 0 | 13 |

Unmet Need

Following the application of the vacant land adjustment, Wildwood City has a combined Third and Fourth Round Unmet Need of 199 units. In addition to satisfying the 25 Percent Language above with the Lily Mae Apartments, the City proposes the following mechanisms to create realistic opportunities for affordable housing units to be developed over the 2025-2035 4th round timeframe:

| Compliance Mechanism | Rental or Sale | Supportive/ Special Needs | Family or Age Restricted | Units | Bonus Credits | Total Credits |
|-------------------------------|----------------|---------------------------|--------------------------|-----------|---------------|---------------|
| Lions Center | Rental | | Age Restricted | 12 | | 12 |
| Inclusionary Housing Overlay | Both | | Family | 11 | | 11 |
| Mandatory Set Aside Ordinance | Both | | Family | TBD | | TBD |
| TOTAL | | | | 23 | | 23 |

| Category | Required | Provided |
|-------------------------------------|----------|----------|
| Total Credits | 48 | 48 |
| Family Units | 24 | 24 |
| Family Rental Units | 12 | 13 |
| Very Low Income Units | 7 | 13 |
| Very Low Income Family Units | 4 | 13 |
| Age Restricted Cap | 14 | 14 |
| Bonus Credits | 12 | 0 |

Lions Center

The Lions Center is a project-based section 202 development that began operation on April 25, 2024 and is located at 3300 New Jersey Ave (Block 192, Lot 20). The project has 112 age restricted units and operates under a HUD restricted use agreement until January 1, 2043. Under the amended Fair Housing Act, the City is permitted to meet up to 30% of its obligation with age-restricted units. The City is applying 14 units at Lions Center towards its 4th round obligation. The use agreement is included as an appendix to this document.

Inclusionary Housing Overlay

Wildwood has adopted an inclusionary housing overlay within its zoning code at §17-415 Zoning Overlay Districts, which was approved by the Court in the 2012 Consent Order. This district covers approximately 81 acres and requires that any garden apartments approved and developed within the overlay zone provide a 20% set-aside for homeownership units and 15% set-aside for rental units. With a presumptive density of 6 units/acre, this overlay could produce 73 rental units or 98 affordable sale units – more than double the 4th round obligation.

Mandatory Set Aside Ordinance

In addition to the Inclusionary Housing Overlay, the City will adopt a mandatory set-aside ordinance that requires any development that includes five or more residential dwelling units to set aside at least 20% of those units for affordable housing. The set aside will also apply to projects receiving approvals from the Zoning Board for an increase in housing density.

Cost Generation

The City of Wildwood will comply with N.J.A.C. 5:93-10 regarding ensuring the elimination of unnecessary cost generating features from municipal land use ordinances. The municipality will eliminate development standards that are not essential to protecting the public welfare and will expedite (“fast track”) approvals/denials on inclusionary development applications. The City will cooperate with developers of inclusionary developments in scheduling preapplication meetings, and municipal boards shall schedule regular and special monthly meetings as needed and provide ample time at those meetings to consider the merits of the inclusionary development application.

Appendix A – Vacant Land Assessment Maps & Tables

Appendix B – Binding Resolution Adopting DCA’s 4th Round Obligation

Appendix C – 2012 Consent Order

Appendix D – Use Agreement for Lions Center

Appendix E – Additional Documents to be completed

Additional documents identified by the Court Directive #14-24 including but not limited to an updated affordable housing ordinance, development fee ordinance, spending plan and affirmative marketing plan shall be completed at a later date.