

**HOUSING ELEMENT AND FAIR SHARE PLAN
FOR THE THIRD ROUND: 1999-2025**

PREPARED FOR

**THE BOROUGH OF EAST RUTHERFORD
IN THE COUNTY OF BERGEN
STATE OF NEW JERSEY**

April , 2016

APPENDIX 1 OF 2

Appendices

Appendix Volume 1 of 2

Report entitled "New Jersey Affordable Housing Need and Obligations" dated March 24, 2016 (the "Econsult Report")	1
Report entitled "Econsult Solution, Inc., Analysis of the Proposed Gap Period (1999 – 2015)" dated February 8, 2016	188
Report entitled "Econsult Solution, Inc. Gap Period Calculation dated March 24, 2016	214

Appendix Volume 2 of 2

Mayor and Council Resolution 82-2015 dated May 19, 2015.	309
Decision and Order in <i>Tomu Development Co., Inc. v. Borough of East Rutherford, et al.</i> , Docket No.: BER-L-5895-03	313
Appellate Division decision in <i>Tomu Development Co., Inc. v. Borough of East Rutherford, et al.</i> , Docket No.: A-5621-05T1.	349
Letter dated March 22, 2016 from counsel for Tomu re-affirming the project	370
Conditional Zoning Certificate for 100 Schindler Court (The Monarch)	372
Resolution of Approval for 132 Union Avenue	375
Mayor and Council Resolution 2012-78 dated June 19, 2012	383
Letter dated August 15, 2013 from the Housing Authority of Bergen County	388
Resolution of Approval for 228 Park Avenue	389
Resolution of Approval for Van Winkle Avenue	398
Resolution of Approval for Oak Street, Central Avenue and Paterson Avenue	402
Group at Route 3, LLC Settlement Agreement	427
Council on Affordable Housing resolution approving the settlement with Group at Route 3.	461
Application of Eastbound, Inc.	488
Letter dated February 11, 2010 from COAH approving Development Fee Ordinance	491
Draft ordinance establishing an Affordable Housing Trust Fund and authorizing the collection of Development fees	500
Resolution of Approval for 384 Paterson Avenue	508



NEW JERSEY AFFORDABLE HOUSING NEED AND OBLIGATIONS



March 24, 2016

REPORT SUBMITTED BY:
Econsult Solutions
1435 Walnut Street
Philadelphia, PA 19102



Peter A. Angelides, Ph.D., AICP
Principal



TABLE OF CONTENTS

Table of Contents.....	2
1.0 Summary of Report	4
1.1 Background.....	4
1.2 Purpose and Scope.....	5
1.3 Methodology.....	6
1.4 Results by Municipality	10
2.0 Defining Housing Regions	11
2.1 Definition Factors	12
2.2 Regional Definitions	15
3.0 Present Need	16
3.1 Measures of Deficient Housing	18
3.2 Unique Deficient Units	20
3.3 LMI Proportion.....	22
3.4 Extrapolation of Present Need	23
3.4.1 Deficient Units in 2000	24
3.4.2 Trend in Deficient Units.....	25
3.5 Present Need Results	26
4.0 Prospective Need by Region	27
4.1 Time Period	28
4.2 Population Projections	29
4.2.1 Population in Households	34
4.3 Headship Rates and Households.....	36
4.4 Median Income and LMI Proportion.....	40
4.4.1 Defining Median Income	40
4.4.2 Calculating LMI Households.....	48
4.5 Significant Housing Assets.....	52
4.6 Prospective Need by Region Results	55
5.0 Municipal Allocation of Prospective Need	58
5.1 Urban Aid Municipalities	58
5.2 Responsibility Factors.....	61
5.2.1 Employment Level	63
5.2.2 Change in Employment	63
5.3 Capacity Factors	64
5.3.1 Aggregate Income Difference.....	64
5.3.2 Developable Land	66
5.4 Municipal Share of Regional Prospective Need	68

6.0	Secondary Sources of Affordable Housing Supply	69
6.1	Demolitions	70
6.2	Residential Conversions	72
6.3	Filtering	73
6.4	Allocation of Secondary Sources	81
6.5	Secondary Source Adjustment Results	83
7.0	Municipal Housing Obligations	86
7.1	Categories of Affordable Housing Need	88
7.2	Prior Round vs. Gap Period Obligations	91
7.3	Reconciling Prior Round (1987-1999) Obligations	93
7.3.1	Offset Method	94
7.3.2	Single Pool Method	96
7.4	Municipal Allocation Caps	97
7.4.1	20% Cap	98
7.4.2	1,000 Unit Cap	99
7.4.3	Municipal Allocation Cap Results	101
7.5	Initial Summary Obligations	102
	Appendix A: Present Need by Municipality	103
	Table A.1: Unique Deficient LMI Housing Units by Municipality (ACS 2009-2013)	103
	Table A.2: Present Need by Municipality	117
	Appendix B: Municipal Allocation of Regional Prospective Need	130
	Table B.1: Qualification of Urban Aid Municipalities	130
	Table B.2: Municipal Allocation of Regional Prospective Need	132
	Appendix C: Secondary Source Adjustments to Municipal Allocations	147
	Table C.1: Secondary Source Adjustments to Municipal Allocations	147
	Appendix D: Allocation Cap Adjustments to Municipal Obligations	161
	Table D.1: Allocation Cap Adjustments to Municipal Obligations	161
	Appendix E: Initial Summary Obligations by Municipality	174
	Table E.1: Initial Summary Obligations by Municipality	174

1.0 SUMMARY OF REPORT

The report that follows develops a complete methodology yielding a calculation of regional affordable housing need and affordable housing obligations for each municipality in New Jersey. This methodology is developed in accordance with relevant Court decisions, precedents and statutes, and the Round 1 and Round 2 (Prior Round) methodologies for the calculation of affordable housing, as specified by the New Jersey Supreme Court's March 2015 decision.

This summary includes a brief overview of the relevant background, principles and methodology employed in this report. The sections that follow explain the methodology employed for each component of the calculation, detail the relevant precedents and statistical considerations used in its development, and present results at the regional and state level. The report concludes with Appendices featuring detailed tables specifying results for each municipality. This summary section concludes with a brief guide containing the section number and page location of key Appendix tables featuring municipal-level results.

1.1 BACKGROUND

In the landmark *Mount Laurel* decisions, and subsequent Fair Housing Act (FHA), New Jersey has required that each municipality make provisions for its "fair share" of affordable housing. "Affordable" housing is defined in the FHA and is generally understood to mean housing that is affordable to a family with household income that is 80 percent of median household income. Households that earn less than 80 percent of median household income are referred to as Low and Moderate Income (LMI) households (N.J.S.A (52:27D-304(c), (d) and (m)).

New Jersey has taken numerous steps over several decades to implement the *Mount Laurel* decisions with respect to the provision of affordable housing for LMI households. Relevant milestones are as follows:

- **Fair Housing Act (FHA)**: The Fair Housing Act of 1985 is the legislative embodiment of the Mt. Laurel decision. The FHA provided the basis for the establishment of the Council on Affordable Housing (COAH) to oversee the fair share housing process that it establishes.
- **Round 1**: COAH calculated the affordable housing obligation for all municipalities in the state. Round 1 went into effect in 1987 and covered the period 1987- 1993.
- **Round 2**: At the close of the Round 1, COAH again calculated the affordable housing obligation for all municipalities in the state. Round 2 went into effect in 1994 and covered the period 1993-1999. The Round 2 methodology was similar to, but not identical to, the Round 1 methodology.

- Round 3 (2004): COAH again calculated the affordable housing obligation for each municipality in 2004, using a different methodology than Round 1 or Round 2. This “growth share” approach was invalidated in 2007 by the New Jersey Appellate Court, which instructed COAH to revise its methodology for this round.
- Round 3 (2008): COAH attempted to remedy the deficiencies of the 2004 method and again calculated affordable housing obligations. While the Appellate Division, in 2010, invalidated some of the various regulations COAH adopted in 2008 including the revised “growth share” methodology, the Supreme Court considered various challenges to the Appellate Division Decision. In 2013, the Supreme Court issued its decision in which it invalidated all of the Round 3 regulations COAH adopted in 2008. In its decision, the Supreme Court instructed COAH to develop a methodology “similar to the methodologies used in the prior round rules” and to adopt new regulations in five months
- Un-adopted Round 3 (2014): COAH prepared a new affordable housing obligation for each municipality based on, but not identical to, the methodologies used in Round 1 and Round 2. COAH ultimately did not adopt these obligations.
- Supreme Court (2015): In March 2015, the New Jersey Supreme Court declared COAH moribund, and ordered the courts to resume oversight of affordable housing. The court ordered each municipality to prepare a new estimate of obligation, and provided guidance on how to do so. The Court ruling, among other things, again affirmed that the methodology for the determination of affordable housing obligations should be similar to the prior rounds.

As outlined above, since the enactment of the New Jersey Fair Housing Act in 1985, the Council on Affordable Housing (COAH) has been responsible for the implementation and assignment of these affordable housing responsibilities. However, for Round 3, COAH has been unable to adopt a methodology for the calculation and assignment of housing obligations that could withstand legal challenge. The absence of precise fair share numbers approved by the courts has frustrated the ability of municipalities to adopt appropriate housing elements and fair share plans and thereby comply with the directive of the Supreme Court to update their housing elements and fair share plans.

1.2 PURPOSE AND SCOPE

The purpose of this report is twofold. First, the report lays out a methodology for calculating affordable housing need for each municipality in New Jersey. Second, the report applies this method to the best and most updated available data to calculate the affordable housing obligation for each municipality. Courts, municipalities and other entities can then use these methods and calculations to inform their decisions about the obligation for each municipality. In sum, this report seeks to quantify the Present Need, Prospective Need, and summary municipal obligations as

accurately as possible, and to be consistent with the Supreme Court's requirement that the approach be similar to the methodologies employed in the Prior Round.

We reserve the right to adjust the report if relevant new or updated information becomes available.

All calculations are based on data sets available uniformly on a statewide basis. At the municipal level, it is possible that there may be more accurate data than that available on a statewide level. Adjustments on the municipal level based on more accurate or recent data are outside the scope of this report, but may be addressed on a case by case basis through the municipal housing plan compliance process. In addition, this report does not quantify housing activity, credits or adjustments obtained by municipalities with respect to their assigned Prior Round (1987-1999) obligations. Nothing in this report should be construed to limit appropriate recognition of this activity, credits and adjustments within the municipal compliance process.¹

1.3 METHODOLOGY

We base our methodology on several basic principles:

- The methodology is based on and similar to methods used in the Prior Rounds, and in other legislation and guidance provided by the Court. However, it is neither possible nor desirable to follow the prior round methodology precisely for several reasons. These include updates to relevant laws and regulations, differing time periods, newly available data sets, corrections to previous errors, and other changed circumstances.
- The methodology is clear and transparent. Calculation of obligations is constrained by the FHA, court decisions, prior methods, data availability, and other factors, so it is complex and lengthy. We lay out the method in significant detail and also provide an electronic appendix.
- For each calculation, we use the most recent and appropriate data that is available on a uniform statewide basis. The data is all derived from publicly available sources.
- To the greatest extent possible, the allocated municipal obligations should reflect the identifiable present and prospective need for affordable housing, as defined by the Fair Housing Act and as explained in In re Adoption of N.J.A.C. 5:96 & 5:97 ex rel. New Jersey Council on Affordable Housing, 221 N.J. 1 (2015) ("Mount Laurel IV").

¹ The Municipal Joint Defense Group engaged Econsult Solutions to prepare this report. Econsult Solutions did not have a list of the participating municipalities at the time this report was issued.

The methodology involves several large-scale steps, many of which have several sub-steps. These steps comprise the sections of the report, where they are defined in greater detail. The Appendices then report results by municipality for each of the 565 municipalities in New Jersey.

The report proceeds in six sections which undertake the following steps:

Define the Regions (Section 2)

In Section 2, we investigate whether there is strong reason to adjust the groupings of New Jersey's 21 counties into the six regions that have been used since Round 2 in 1994, based on changed circumstances. We conclude that while other permutations may be plausible, the Prior Round methodologies and FHA do not provide a clear standard by which regional definitions should be adjusted. Absent a compelling rationale for change, the regional definitions are maintained unadjusted for this analysis.

Calculate Present Need (Section 3)

In Section 3, we calculate the Present Need by municipality. Present Need is an estimate of existing deficient housing currently occupied by LMI households. As in the Prior Round methodology, surrogate measures are utilized to estimate the level of inadequate housing in each municipality. It is necessary not only to determine the number of units that meet each criterion, but to adjust for the overlap between each measure to avoid double counting and to yield an estimate of unique deficient housing units. Then, the proportion of those unique deficient units occupied by LMI households is estimated.

Finally, it is necessary to extrapolate the result yielded by the most recent available data forward to produce a current estimate of Present Need as of the start of the Prospective Need period. This is done by estimating for each municipality the deficient units occupied by LMI households in 2000 (in the same manner described above) to determine an annualized trend in Present Need that is then extrapolated forward to yield a current estimate. This extrapolation procedure, combined with a more sophisticated approach to estimating the overlap in deficient units, results in a slightly higher estimate of aggregate Present Need than that produced by other recent analyses.

Nothing herein is intended to preclude a municipality from conducting an appropriate housing survey to demonstrate that the actual Present Need for their municipality differs from the estimate of Present Need presented in this analysis.

Calculate Prospective Need by Region (Section 4)

In Section 4, we calculate the Prospective Need by region. Prospective Need represents an estimate of the anticipated need for affordable housing based on projected growth in LMI households. The Prospective Need period is ten years, covering July 1, 2015 through June 30, 2025.

The calculation starts by estimating population growth in the Prospective Need period. Population projections are then translated into households. The procedure utilized in this analysis, which tracks the Round 2 methodology closely, yields an estimated population growth slightly higher than, and broadly in line with, observed statewide household growth over the past fifteen years. Next, the proportion of households qualifying as LMI is estimated, and those LMI households that are not eligible for affordable housing due to their level of housing assets are removed. This process yields estimates of eligible LMI households at the start (2015) and end (2025) of the Prospective Need period. The incremental difference between these figures represents the Prospective Need for each region.

Allocate Prospective Need to Municipalities (Section 5)

In Section 5, we calculate the regional allocation shares for Prospective Need for each municipality. First, qualifying urban aid municipalities are determined and removed from this portion of the calculation, as their Prospective Need allocation is zero. Then, as in the Prior Round methodology, an allocation formula is developed based on a combination of “responsibility” factors, which estimate the contribution of each municipality to regional need, and “capacity” factors, which estimate the ability of each municipality to absorb regional need. Specific calculations for each of these factors have been refined and updated based on the most up to date and appropriate data source.

Municipal shares as a proportion of the region for each of these responsibility and capacity metrics are then averaged to yield a single allocation share for each municipality. These shares are then applied to the regional Prospective Need calculated in Section 4 to yield the Prospective Need allocation for each municipality. Therefore, the sum of each municipality’s allocation in each region equals the regional Prospective Need.

Adjust for Secondary Sources of Affordable Housing Supply (Section 6)

In Section 6, we adjust for anticipated changes in affordable housing supply over the ten-year period. These “secondary source” adjustments account for the natural evolution of the housing stock over time due to market-based factors. This step reflects the fact that affordable housing is provided not only through dedicated planning and zoning policy, but also through changes in housing value (and thus cost) over time. Said another way, much of the housing currently occupied by LMI households was not originally built as “affordable housing.”

As in the Prior Round methodology, trends in market-based activity are analyzed and extrapolated forward to yield an estimate of future supply changes over the ten-year period. Estimates are developed for the net effect of the filtering of housing stock, the net effect of residential conversions, and the negative effect of demolitions on the supply of affordable housing for each municipality. These three figures are then summed to yield a net effect from secondary sources of supply for each municipality. This net change in supply is applied to the initial Present Need and Prospective Need for each municipality to yield an adjusted Present and Prospective Need. Since this process may yield a negative need for some municipalities, a regional allocation of additional units below this “zero bound” is undertaken to ensure that the methodology aligns aggregate municipal need with the estimated changes in affordable housing supply.

Nothing herein is intended to preclude a municipality from using local data and information to demonstrate that secondary source adjustments for their municipality differ from those set forth herein.

Determine Municipal Obligations (Section 7)

In Section 7, we reconcile the allocation of Present Need and Prospective Need yielded by Sections 3-6 with additional adjustments required by the relevant statutes and Court decisions to arrive at an initial summary obligation for each municipality.

Together, Present Need and Prospective Need completely describe the identifiable need for affordable housing within the fair share framework set forth in the FHA. Therefore, no calculations of additive housing need are undertaken.

However, the Prior Round methodology and the FHA define two caps which are applied to municipal housing allocations: (i) the 20 percent cap; and (ii) the 1,000-unit cap. Further, the Supreme Court stated that its March 2015 decision “does not eradicate” unfulfilled Prior Round (1987 – 1999) obligations, which serve as “the starting point for the determination of a municipality’s fair share responsibility” within the current cycle (221 N.J.1 at 30). Given perfect information, it would be possible to incorporate the unfulfilled portion of the Prior Round obligation into the allocation process for the current cycle, aligning aggregate housing obligations with identified housing need. Absent that information, the initial Prior Round obligation, as assigned to municipalities in Round 2 in 1993-1994, is summed with the Present Need and Prospective Need to yield an initial summary obligation for each municipality. Municipalities can then reduce that obligation, which is reported in the final table of this report, by demonstrating applicable adjustments, housing activity and credits on a case by case basis in their efforts to secure approvals of their affordable housing plans.

1.4 RESULTS BY MUNICIPALITY

Results for each municipality yielded by this methodology are included in the Appendices to this report. Municipal-level results can be found in the following tables and page locations:

- Present Need by Municipality: Appendix A, Table A.2 (p. 117 - 129)
- Municipal Allocation of Regional Prospective Need: Appendix B, Table B.2 (p. 132 - 146)
- Secondary Source Adjustments to Municipal Allocations: Appendix C, Table C.1 (p. 147 - 160)
- Allocation Cap Adjustments to Municipal Obligations: Appendix D, Table D.1 (p. 161 - 173)
- Initial Summary Obligations by Municipality: Appendix E, Table E.1 (p. 174 - 187)²

² Note that the initial summary obligations include the full unadjusted Prior Round (1987-1999) obligations for each municipality as initially assigned by COAH in 1993. Municipalities can then reduce that initial obligation through the demonstration of applicable adjustments, housing activity and credits on a case by case basis in their efforts to secure approvals of their affordable housing plans.

2.0 DEFINING HOUSING REGIONS

Housing regions are the geographic unit for many of the calculations that ultimately result in a fair share obligation for each of New Jersey's 565 municipalities. Regional calculations sum to, rather than derive from, statewide calculations. In other words, there is no statewide calculation of affordable housing need – there is only a series of regional calculations, which can be summed to produce a statewide result.

While the Prior Round methodologies are clear about the importance of the housing regions, they are less clear as to the standards by which regions should be defined. The Fair Housing Act defines "Housing Region" as follows:

"Housing region" means a geographic area of not less than two nor more than four contiguous, whole counties which exhibit significant social, economic and income similarities, and which constitute to the greatest extent practicable the primary metropolitan statistical areas as last defined by the United States Census Bureau prior to the effective date of P.L.1985, c. 222 (C.52:27D-301 et al.).

[N.J.S.A. 52:27D-304 b.]

Under the "Definitions" section (5:93-1.3), the Round 2 rules adopt the definition of "Housing Region" found in the FHA and quoted above.

This definition offers no clear guidance as to a statistical standard that can be applied to determine a single "best" distribution of counties into regions. PMSA's are specifically referenced as a point of consideration, as well as the more subjective concept of "significant social, economic and income similarities." The Round 2 methodology identifies journey-to-work data as a relevant indicator related to this standard [26 N.J.R 2315 – 2316], and we have analyzed the journey-to-work with updated data, as reported below. However, the Round 2 methodology concludes its description of the county sorting process by stating that subjective factors were also used:

After including certain judgmental decisions regarding the size of a region and its capacity to handle need, as well as the necessary inclusion in each region of at least one central city, the journey-to-work region takes the following form...

[26 N.J.R 2316]

The housing region definitions adopted in Round 2 were an alteration of those adopted in Round 1 (with Sussex moving from Region 2 to Region 1, Warren from Region 3 to Region 2, and Mercer from Region 5 to Region 4). The housing regions as defined in Round 2 have been maintained by COAH in each attempt at promulgating Round 3 rules. The Round 2 definitions are shown in Table 2.1 below.

TABLE 2.1: REGIONAL COUNTY GROUPINGS ADOPTED IN ROUND 2 METHODOLOGY

Region	Counties
1	Bergen, Hudson, Passaic, Sussex
2	Essex, Morris, Union, Warren
3	Hunterdon, Middlesex, Somerset
4	Mercer, Monmouth, Ocean
5	Burlington, Camden, Gloucester
6	Atlantic, Cape May, Cumberland, Salem

2.1 DEFINITION FACTORS

The basic premise, set forth repeatedly in earlier rounds, is that employment drives much of the need for affordable housing. Accordingly, employment (and employment centers) within a region create the need for affordable housing that needs to be met within that region. The Round 2 methodology uses journey-to-work data on the origin and destination of work trips from the 1990 Census to help define appropriate regional groupings. Since that time, a more robust data set of live-work relationships between various counties has been developed by the U.S. Census Bureau through its Longitudinal Employer Household Dynamics (LEHD) program.

The LEHD program includes collaboration between the federal Census Bureau and 49 states³ under the Local Employment Dynamics (LED) Partnership. Under this program, states share Unemployment Insurance earnings data and Quarterly Census of Employment and Wages data with the Census Bureau, which combines these administrative data with its own administrative inputs and data from censuses and surveys. These inputs yield detailed statistics on employment, earnings and job flows at a variety of geographic levels. This data set, which was unavailable at the time of the Round 2 methodology, represents the most updated and appropriate data set for evaluating the live-work relationships between counties.

A matrix of live-work relationships between each of New Jersey’s 21 counties was developed from the publicly available LODES (LEHD Origin-Destination Employment Statistics) database. Workers were sorted based on the location of their “primary job,” defined as (“the job that earned the individual the most money”) since a worker’s primary job is more likely than ancillary jobs to drive their choice of residential location. Next, the category of highest earners are removed, since the focus of the regional definition is in this instance the provision of affordable housing for low

³ Massachusetts does not participate in the program, and is thus not represented in the otherwise comprehensive data set.

and moderate income workers.⁴ Finally, only workers who both live and work in New Jersey are considered, since no possible regional definition will capture those workers who live or work in another state in the same region.⁵

This data matrix can then be used to calculate the proportion of low and moderate income New Jersey workers residing in each region who also work in the same region. Results based on the Round 2 regional definitions are shown below in Table 2.2. Proportions range from 61% to 76% in each region, and average 69% statewide.

TABLE 2.2: LIVE/WORK PROPORTIONS FOR LOW AND MODERATE WAGE EARNERS BY HOUSING REGION, 2013

Region	Counties	NJ Workers Residing and Working in Region	NJ Workers Residing in Region	Live & Work Proportion
1	Bergen, Hudson, Passaic, Sussex	257,000	363,000	71%
2	Essex, Morris, Union, Warren	215,000	338,000	64%
3	Hunterdon, Middlesex, Somerset	133,000	217,000	61%
4	Mercer, Monmouth, Ocean	190,000	273,000	70%
5	Burlington, Camden, Gloucester	176,000	231,000	76%
6	Atlantic, Cape May, Cumberland, Salem	97,000	129,000	76%
State		1,068,000	1,550,000	69%

The statewide live-work percentage yielded by this combination of regions is not the highest of any possible permutation identified by ESI's statistical analysis. However, alternate combinations produce only incremental changes (not larger than 1-2 percent) in the statewide live-work proportion. Some of these combinations do so by increasing live-work proportions in some regions while reducing it in others, while other combinations alter the balance of overall population and economic activity by clustering more large counties together. Thus, while alternate possible combinations were identified based on this metric, their incremental magnitude and the distributional challenges they present suggest that none is a clear improvement relative to the current definitions.

⁴ LODES data divides earners into three income categories, with the highest earners earning greater than \$3,333 per month, or \$40,000 per year. While this income category does not precisely match the LMI thresholds in New Jersey (which vary by region and household size), removing this category provides a more accurate proxy for LMI commuting patterns than an analysis that includes all earners.

⁵ It is worth noting that a significant portion of New Jersey employees and employed residents are cross-state commuters, particularly in the counties that are part of the New York and Philadelphia metro areas. Conceptually, these cross-state commuters fall outside of the linkages between localized employment and housing that define much of the Prospective Need calculation.

Further, it is unclear from the text of the FHA that live-work combinations are the primary metric by which regional definitions should be constructed. While the Round 2 methodology clearly conducts a similar analysis, it just as clearly applies additional “judgmental decisions.” Further, no references to live-work data appear in the FHA definition, and this approach represents an indirect and incomplete measure of “social, economic and income similarities.”

PMSA Definitions

The additional factor referenced in the FHA is the defined Primary Metropolitan Statistical Areas (PMSA) issued by the U.S. Census Bureau. PMSAs represent clusters of counties which should form the basis of housing regions “to the greatest extent practicable.” However, PMSA’s have been discontinued as a regional grouping by the Census Bureau, with the last set of definitions issued in 1999. Table 2.3 below shows the PMSA’s into which New Jersey counties were divided in those definitions.

TABLE 2.3: NEW JERSEY COUNTIES BY PMSA DEFINITIONS FROM U.S. CENSUS BUREAU (1999)

PMSA	New Jersey Counties
Bergen-Passaic	Bergen, Passaic
Jersey City	Hudson
Middlesex-Somerset-Hunterdon	Hunterdon, Middlesex, Somerset
Monmouth-Ocean	Monmouth, Ocean
Newark	Essex, Morris, Sussex, Union, Warren
Trenton	Mercer
Atlantic-Cape May	Atlantic, Cape May
Philadelphia (PA)	Burlington, Camden, Gloucester, Salem
Vineland-Milville-Bridgeton	Cumberland

A 2005 Bulletin⁶ from the Federal Office of Management and Budget (OMB) to Executive Departments explains the evolution of statistical area definitions as follows:

The terms “Consolidated Metropolitan Statistical Area” and “Primary Metropolitan Statistical Areas are now obsolete...A Metropolitan Division is most generally comparable in concept, and equivalent to, the now obsolete Primary Metropolitan Statistical Area.

Therefore, Table 2.4 shows the Metropolitan Divisions into which New Jersey counties are assigned (last defined in 2013).

⁶ Bulletin 05-02, *Update of Statistical Area Definitions and Guidance on their Usage*, Office of Management and Budget, February 22, 2005. Available online at: (https://www.whitehouse.gov/omb/bulletins_fy05_b05-02)

TABLE 2.4: NEW JERSEY COUNTIES BY METROPOLITAN DIVISION DEFINITIONS FROM U.S. CENSUS BUREAU (2013)

Metropolitan Areas	New Jersey Counties
Allentown-Bethlehem-Easton (PA)	Warren
Atlantic City-Hammonton	Atlantic
Camden	Burlington, Camden, Gloucester
Newark	Essex, Hunterdon, Morris, Somerset, Sussex, Union
New York-Jersey City-White Plains (NY/NJ)	Bergen, Hudson, Middlesex, Monmouth, Ocean, Passaic
Ocean City	Cape May
Trenton	Mercer
Vineland-Bridgeton	Cumberland
Wilmington (DE)	Salem

A review of these tables shows the challenge in executing the goal of following “to the greatest extent practicable” the PMSA definitions in defining housing regions. First, PMSA’s no longer exist, and groupings have changed significantly from PMSAs to Metropolitan Divisions for New Jersey’s counties. Second, the constraint imposed by the FHA to create groupings of “not less than two nor more than four contiguous, whole counties” must be balanced with PMSA definitions that include three single counties and a group of five counties, or Metropolitan Area definitions that contain six single counties and two groupings of six counties. Assigning these single counties to other natural “clusters,” and breaking up the large groups, creates a chain of impacts throughout the regions regardless how it is executed. Broadly speaking, the Round 2 housing region definitions do maintain the major PMSA clusters intact, and where they do not, presumably the directive to follow PMSA definitions has been balanced against the directive to define regions “which exhibit significant social, economic and income similarities.”

2.2 REGIONAL DEFINITIONS

The standards set forth in the FHA and the Prior Round methodologies do not present an objective standard by which to judge optimal housing regions. Live-work data is clearly considered a factor, as are the former PMSA definitions from the U.S. Census Bureau, but each are balanced with what the methodology terms “judgmental” factors. The regional definitions utilized in Round 2 follow neither the optimal live-work permutations nor the PMSA clusters exactly, but are nonetheless broadly in line with groupings suggested by each of those standards. Further, it is not clear what objective metric might better suit the FHA’s standard of “significant social, economic and income similarities.” In the absence of such an alternate standard, this analysis maintains the regional groupings as defined in the Round 2 methodology.

3.0 PRESENT NEED

Present Need, also commonly referred to as “the indigenous need” or “rehabilitation share”, represents an estimate of the current stock of deficient housing within each municipality occupied by low and moderate income households.

- Present Need is not estimated on a forward-looking basis, but rather is an estimate of current conditions. As such, Present Need is best estimated as of the start of the Prospective Need period. Synchronizing the calculation of Present Need and Prospective Needs avoids either a gap period during which additional Present Need may accumulate prior to the start of the period, or an overlap during which additional LMI households who live in deficient housing units would be counted in both Present Need and Prospective Need. Therefore, the Present Need estimate is calculated as of July 1, 2015, matching the start of the Prospective Need period (as discussed in Section 4.1).
- Unlike Prospective Need, for which the base unit is households, the base unit for Present Need is occupied housing units. The procedure described below identifies indicators of housing deficiency, and accounts for overlap between those deficiencies in the same unit, and then applies the estimated proportion of LMI households currently occupying those deficient units. The result of this calculation is an estimate of units, rather than households. Importantly, the analysis estimates only deficient units occupied by LMI households. Therefore, for example, housing that is deficient but vacant is excluded.

The Present Need methodology employed in Rounds 1 and 2 estimates Present Need on a municipal basis. However, after this initial calculation, the proportion of housing stock estimated to be deficient in each region is identified, and each municipality’s “indigenous” Present Need is capped at that proportion of its municipal housing stock. The remaining Present Need units are pooled regionally and distributed to municipalities based on allocation factors that are similar to those employed in the municipal allocation of regional Prospective Need (see Section 5), similarly excluding qualifying urban aid municipalities. This obligation is referred to in Rounds 1 and 2 as “Re-Allocated Present Need,” with total Present Need for each municipality comprised of the sum of “Indigenous Need” and “Re-Allocated Present Need” (See 26 N.J.R. 2317-2319).

COAH’s Round 3 methodologies published in 2004, 2008 and 2014 each eliminated the calculation of Re-Allocated Present Need, and instead simply adopted the estimate of deficient units occupied by LMI households within each municipality as that municipality’s Present Need (prior to any applicable adjustments or obligation caps). This change in methodology was challenged, but specifically upheld by the Appellate Court decisions which struck down both iterations of the “Growth Share” methodology in 2007 and 2010, and the 2013 Supreme Court decision affirming the Appellate Court. The Supreme Court’s 2015 decision explains the Court’s current position on Re-Allocated Present Need in its discussion of principles that the courts should follow in implementing its decision:

...the Appellate Division twice addressed the Third Round Rules' elimination of the reallocation of excess present need and found it permissible under both the FHA and Mount Laurel II...and this Court "substantially affirmed" that opinion. The Mount Laurel judges may proceed on this basis when reviewing the plans of municipalities.

[221 N.J. 1 (2015), page 30-31]

The procedure described below adopts the Round 3 approach specifically identified as permissible by the courts of maintaining estimated Present Need within each municipality, rather than re-allocating a portion of it within the region.

The procedure occurs in four steps, which are described in turn in the section that follows, to yield an estimate of Present Need by municipality summarized in Section 3.5 and shown in full in Appendix A:

1. First, we identify three surrogate measures of inadequate housing, and determine the current magnitude of each deficiency by municipality (Section 3.1).
2. Next, we adjust for the overlap between surrogates of deficiency (which may occur in the same unit) to arrive at a unique deficient unit estimate by municipality (Section 3.2).
3. Next, we apply the proportion of unique deficient units estimated to be occupied by LMI households to yield an estimate of unique, deficient LMI units by municipality (Section 3.3).
4. Finally, the procedure is repeated for a prior point in time to determine Present Need as of that time. An annualized growth trend in present need is determined by comparing current Present Need to the prior Present Need. That growth trend is applied to the current Present Need to yield an estimate of Present Need as of July 1, 2015 (Section 3.4).

3.1 MEASURES OF DEFICIENT HOUSING

To estimate the volume of deficient housing in each municipality, surrogate measures of housing deficiency must first be chosen. The Round 2 methodology utilizes seven proxies⁷ tracked in Census data, and classified units as deficient if they were identified in two or more of the surrogate measures. COAH's 2004 Round 3 methodology replaces these indicators with three proxies, two of which are measured directly (units with inadequate plumbing facilities and units with inadequate kitchen facilities) and one of which combines two of the prior measures (units built before a given date with 1.01 or more persons per room, i.e. "old and overcrowded"). Under this approach, identification of a unit on any one of the three surrogates⁸ results in that unit being classified as deficient.

This change in methodology was challenged, and was specifically approved by the 2007 Appellate Division decision that rejected the overall "Growth Share" approach. That decision writes, with respect to Present Need (called "rehabilitation share" in this iteration):

Because the third round methodology captures a newer overcrowded unit in the rehabilitation share if it lacks plumbing or kitchen facilities, and the other previously-used surrogates are unavailable in the current Census data, COAH's new approach as to overcrowded units is neither arbitrary nor irrational.

[In re Adoption of N.J.A.C 5:94 & 5:95, 390 N.J. Super. 1]

The Supreme Court's 2015 decision explains the Court's current position on indicators of deficient housing in its discussion of principles that the courts should follow in implementing its decision:

...the Appellate Division also approved a methodology for identifying substandard housing units that used "fewer surrogates [or indicators] to approximate the number of deficient or dilapidated housing units...the Appellate Court acknowledged a change in the available United States Census data that triggered the reduction in indicators and found that COAH did not abuse its discretion in reducing the number of factors from seven to three. That, like the previously mentioned areas left to COAH's discretion, and others not directly precluded by the Appellate Court's decision or ours remain legitimate considerations for the Mount Laurel judges when evaluating the constitutionality and reasonableness of the plans they are called upon to review.

[221 N.J. 1 (2015), page 45-46]

⁷ The proxy measures are: (1) units built prior to 1940; (2) overcrowded units, that is, units having 1.01 or more persons per room; (3) inadequate plumbing; (4) inadequate kitchen facilities; (5) inadequate heating fuel, that is, no fuel at all or using coal or wood; (6) inadequate sewer services; and (7) inadequate water supply. [Reproduced from In re Adoption of N.J.A.C 5:94 & 5:95, 390 N.J. Super 1. See also: 26 N.J.R. 2345 for description in Round 2 methodology]

⁸ Note that the third surrogate ("old and overcrowded") itself requires two different conditions to be present in the same unit; once that estimate has been developed, however, the third surrogate is treated as a single condition.

Accordingly, we adopt the Round 3 approach specifically identified as permissible by the courts with respect to the surrogate indicators of housing deficiency.

Indicators of inadequate plumbing facilities and inadequate kitchen facilities are left unchanged from the Round 3 (and indeed the Round 2) methodology. With respect to old and overcrowded housing, the age of a structure is grouped by the Census into ten year bands by year built (i.e. 1930-1939, 1940-1949, etc.).

Despite the court's acceptance of a pre-1940 cutoff date, we use a cut-off of pre-1960 as the definition of old housing units, as was done in the un-adopted 2014 Round 3 rules for COAH. We do so primarily because it strains the definition of the term "old" to fail to update the cut-off point indefinitely.⁹ The age of a structure is not an indicator of deficiency by itself; instead, units identified as both old (constructed pre-1960) AND overcrowded (as defined by more than 1 person per room) are considered deficient within this procedure.

The most up to date data source available for this calculation is the 2009-2013 American Community Survey (ACS) from the U.S. Census Bureau.¹⁰ The five-year ACS provides estimates of a variety of metrics needed to estimate the surrogates and some of their inter-relationships at the municipal level. To determine the inter-relationship between certain indicators (as is necessary to properly account for units with multiple deficiencies), it is necessary to utilize the Public Use Micro Sample (PUMS) from the 2009-2013 ACS, a data set which provides users with the ability to develop custom "cross-tabs" showing the inter-relationships between multiple survey questions. The PUMS represents 5 percent of total responses in the ACS. Due to the geographic classification of the data and the imperative of sufficient sample size, it is necessary to calculate relationships from the PUMS at the county level and apply those relationships back to known counts of deficient units by municipality from the full ACS.¹¹

It is important to note that the data in the 2009-2013 ACS is effectively drawn in even increments across the five-year span it represents. While a portion of the data included is from 2013, the "midpoint" of the data sample is 2011. Therefore, Present Need estimates arising from this data set are best thought of as being calculated "as of" 2011, rather than 2013. This distinction is relevant for the extrapolation calculation performed in Section 3.4 below.

⁹ The Round 2 methodology identified housing build prior to 1940 as old, explaining that "this pre-World War II cutoff is the classic differentiation point of new versus old housing in the literature." (26 N.J.R. 2345) COAH's 2004 Round 3 Present Need methodology approved by the court maintained this 1940 cutoff point, suggesting that "old" housing was defined not simply by the age of a structure, but by this pre-war/post-war distinction, which may also be associated with new building techniques and materials relevant to the soundness of a unit.

¹⁰ We note that the 2010-2014 five-year ACS data was released in December 2015, just prior to the release of this report, but too late for inclusion in the calculation. Since five-year samples are updated on a rolling basis with each new year, there is functionally an 80% overlap in data between the 2009-2013 and 2010-2014 samples.

¹¹ Note that the most recent decennial Census (Census 2010) no longer includes the "long-form" questions necessary to perform this analysis. The Census is instead now "short-form" only, with "long-form" questions appearing in the ACS.

3.2 UNIQUE DEFICIENT UNITS

The three surrogates of housing deficiency identified in Section 3.1 are not mutually exclusive, meaning that the same housing unit could suffer from multiple deficiencies. Therefore, to develop an estimate of the total number of deficient units in each municipality, reported figures from ACS for each surrogate cannot be summed together without accounting for the overlap between surrogacy measures. Accounting for this overlap allows for an estimate of unique, deficient units in each municipality to be developed.¹² We have estimated unique overlap proportions for the potential combinations of deficiencies, and municipal data is utilized to the greatest extent possible.

The procedure begins with the total count of occupied units with lacking adequate plumbing facilities by municipality, drawn from the 2009-2013 ACS.

Second, the proportion of units that are both old and crowded is determined by municipality, deducting those old and crowded units that also have inadequate plumbing (and have thus already been accounted for). The ACS provides municipal level data on occupants per room, year built and plumbing conditions within the same "cross-tab" table. However, the cut-off date for unit construction is "before 1950," rather than the pre-1960 cut-off date needed for this procedure. Nonetheless, this table yields the best estimate of old and overcrowded units built before 1950, which would otherwise have to be estimated through proxies and ratio analysis, and additionally allows for an accounting of the overlap with inadequate plumbing units.

An additional estimate of crowded units built between 1950 and 1959 (net of those with inadequate plumbing) is needed. The first step in developing this estimate is to calculate the proportion of units built after 1949 in each municipality that are also crowded and have complete plumbing (from the same ACS table). This proportion can then be applied to the recorded total number of current units in each municipality that were built between 1950 and 1959. This procedure yields a municipal-level estimate of the number of occupied units built within the 1950 to 1959 period that are overcrowded (meaning that they qualify as deficient) but have adequate plumbing (meaning that they are not double counted). This figure is then summed with the counts of units without adequate plumbing and crowded units built prior to 1950 with adequate plumbing to yield a non-overlapped estimate of two of the three measures of deficiency using only municipal data.

¹² Previous methodologies using the three surrogate factors adopted in this procedure (specifically the un-adopted 2014 Round 3 rules for COAH and the 2015 calculation by Dr. David Kinsey for FSHC) have developed estimates of the proportion of deteriorated units with multiple deficiencies within each county. This proportion was then applied globally within each county to the sum of deficiencies identified using the surrogates in each municipality to produce an estimate of unique deficient units. This approach lacks precision with regard to the type of deficiency identified and the likelihood of overlap. For example, units with inadequate plumbing may have a greater or lesser likelihood to have additional deficiencies than the average deficient unit, or certain municipalities may have a greater proportion of overlapping deficiencies than others within the same county. Further, this approach incorrectly applies a reduction for overlap in instances where deficient units have only been identified in one of the three surrogates, and therefore by definition the overlap is zero.

Next, the number of occupied units with inadequate kitchen facilities is identified from the ACS by municipality. Data is not available from the ACS, however, on the overlap between those units with deficient kitchens and those units previous identified as having deficient plumbing or being old and crowded. Therefore, analysis is performed using the 5 percent Public Use Micro Sample (PUMS) from the 2009-2013 ACS to determine, among the units that have inadequate kitchens in each county, the proportion that have neither of the other two deficiency indicators. That proportion (which is calculated for each county) is multiplied by the number of occupied units with deficient kitchens in each municipality. This yields an estimate of units with deficient kitchens “only” (i.e. without the other indicators of deficiency) in each municipality.

Last, these three non-overlapping set of figures are summed to yield an estimate of unique non-overlapped deficient units by municipality. Table 3.1 below shows the resulting estimates, summed at the region and statewide level (see Appendix A for figures by municipality). Statewide, approximately 90,700 unique deficient units are identified.

TABLE 3.1: ESTIMATE OF UNIQUE DEFICIENT OCCUPIED HOUSING UNITS BY REGION AND STATEWIDE, ACS 2009-2013

Region	Inadequate Plumbing	Pre-1960 and Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units
1	4,132	27,020	4,257	35,409
2	3,986	17,800	4,016	25,802
3	1,581	5,890	1,750	9,221
4	2,226	4,584	2,734	9,544
5	1,316	2,491	2,064	5,871
6	1,069	2,606	1,166	4,841
State	14,310	60,391	15,987	90,688

3.3 LMI PROPORTION

The next step is to estimate the proportion of these unique deficient units that are occupied by a low or moderate income household. Estimating this proportion requires cross-referencing the unique deficient housing units identified above with the household size and income characteristics of the occupants, which are then cross-referenced with regional LMI income thresholds matching those used in the Prospective Need calculation (and discussed at length in Section 4.4.1). This procedure requires the use of the Public Use Micro Sample (PUMS) from the 2009-13 ACS, and is calculated for each county.¹³ These county proportions are then applied back to the estimate of unique deficient units for each municipality to yield an estimate of unique deficient LMI units.

The deficient units are estimated at the municipal level based on county LMI shares. Table 3.2 summarizes the estimates at the regional and statewide level (see Appendix A for figures by municipality). The statewide estimate of unique deficient LMI units is approximately 64,800.

TABLE 3.2: ESTIMATED UNIQUE DEFICIENT OCCUPIED LMI HOUSING UNITS BY REGION AND STATEWIDE, ACS 2009-2013

Region	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
1	35,409	74.5%	26,382
2	25,802	73.2%	18,899
3	9,223	69.9%	6,444
4	9,544	70.0%	6,685
5	5,871	62.4%	3,666
6	4,481	56.2%	2,722
State	90,690	71.5%	64,798

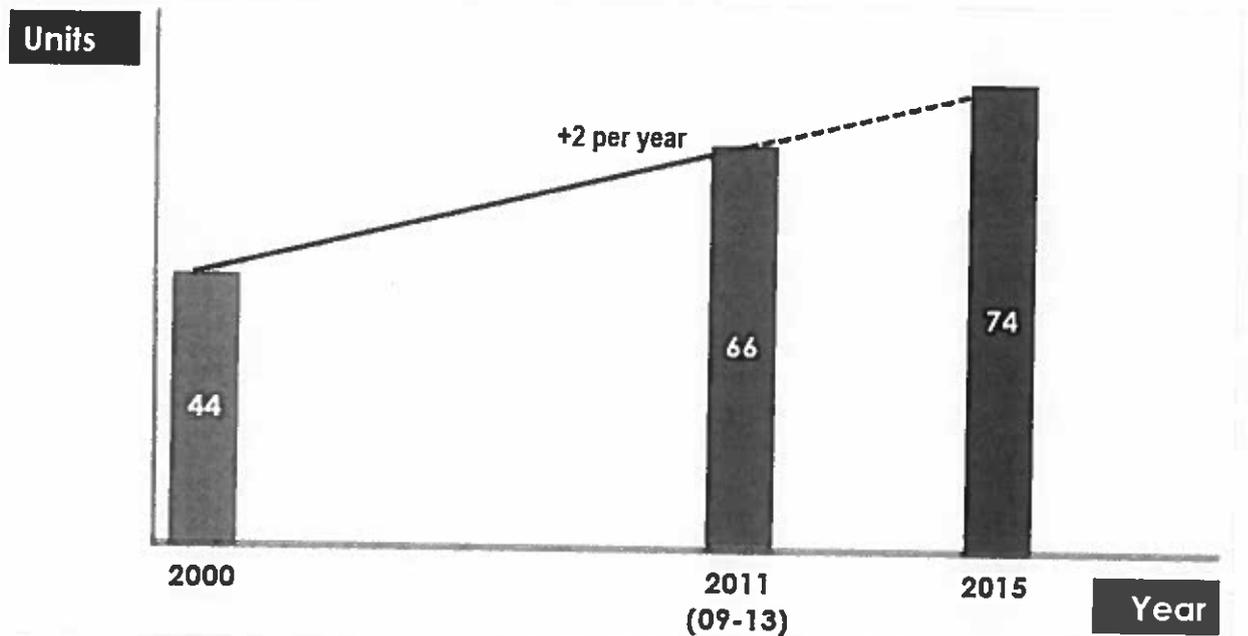
¹³ Note that this procedure estimates the LMI proportion only of those households occupying deficient housing, not of all households within the county. Therefore, while LMI thresholds match those utilized in the Prospective Need calculation, results by county differ from those yielded by analyzing all households for the determination of Prospective Need. Not surprisingly, the LMI proportions are generally higher among those households living in deficient housing than among all households.

3.4 EXTRAPOLATION OF PRESENT NEED

As previously noted in Section 3.1, the most recent available data on housing deficiency is best understood as representing deficiency “as of” 2011. Therefore, the Present Need estimate is extrapolated forward from 2011 to 2015, matching the start date of the Prospective Need period (as discussed in Section 4.1). We use the 2000-2011 trend in LMI deficient units to estimate the change for each municipality from the prior period.¹⁴

We estimate unique LMI deficient units for each municipality in 2000 using data from Census 2000 and a parallel procedure to the one described above using ACS 2009-2013. The resulting estimate for each municipality for 2000 is then compared with the midpoint 2011 estimate to calculate a net change (which may be positive or negative). This net change is annualized over the 11 year period. Four years of this annualized trend are then applied to the current estimate for each municipality to extrapolate an estimate of Present Need from the 2011 estimate to 2015.

FIGURE 3.1: EXTRAPOLATION OF PRESENT NEED FOR A SAMPLE MUNICIPALITY



¹⁴ The un-adopted 2014 Round 3 methodology for COAH extrapolated a Present Need estimate drawn from the 2010 Census to 2014 (the start of the Prospective Need period within that analysis) by calculating the unique LMI deficient units as a proportion of occupied housing stock for each municipality as of 2010, and applying that proportion to the occupied housing stock as of 2014. This approach effectively ties the extrapolation of Present Need to increases in housing stock in the interim years, which is somewhat flawed as a proxy for changes in deficient housing because new units created in the interim years are highly unlikely to be deficient, meaning that the proportion of deficient units is unlikely to stay constant with growth in the housing stock. Meanwhile, older existing units may become deficient within the interim years, or deficient units may be remediated or demolished in that time. As a result, net LMI deficient units within a municipality may increase or decrease over the time period, independent of net change in the housing stock.

3.4.1 DEFICIENT UNITS IN 2000

A parallel methodology to the procedure described above is performed using Census 2000 data to estimate unique LMI deficient units by municipality as of 2000. Definitions of inadequate plumbing and inadequate kitchen are identical to those used in the current calculation. For old and crowded housing, the threshold for the year housing is constructed is moved back from the pre-1960 cut-off used in the current analysis to a pre-1950 cut-off.¹⁵

Census 2000 data provides direct cross-tabs of occupants per room and plumbing conditions by age of housing, with housing divided into pre-1950 and post-1950. It is therefore possible to identify old and crowded units by municipality directly in this data set, and to produce a non-overlapped count of units with deficient plumbing and those that are old and overcrowded. As in the 2009-13 procedure, the count of occupied units with inadequate kitchen facilities within each municipality is then adjusted by the proportion of units with inadequate kitchens within each county that have no other deficiency indicators (as identified in the PUMS data from the 2000 Census). This calculation produces an estimate of inadequate kitchen units net of any overlap with the prior deficiency indicators, meaning the categories can be summed to produce an estimate of unique deficient units by municipality. This estimate is then multiplied by the proportion of unique deficient units identified as being occupied by LMI households in each county, as identified in PUMS data based on LMI income cutoffs by household size from Census 2000 data (described in more detail in Section 4.4.1). The results of this calculation are shown by county and statewide in Table 3.3, and municipal level estimates are shown in Appendix A. The statewide estimate of deficient LMI units as of 2000 is approximately 52,400, about 12,400 less than the estimate from ACS 2009-13 data.

¹⁵ Note that the aim of this calculation is to estimate the number of deficient LMI units that existed in each municipality in 2000, rather than the number of currently deficient units that existed and were deficient as of 2000. Therefore, it is necessary to shift the cut-off date for the year of construction to maintain a consistent age span of approximately 50 years for the definition of "old" housing. The extrapolation methodology using this consistent age span thereby effectively proxies the housing stock that becomes old by the 50 year definition between 2011 and 2015.

TABLE 3.3: ESTIMATED UNIQUE DEFICIENT OCCUPIED LMI HOUSING UNITS BY REGION AND STATEWIDE, AS OF 2000

Region	Inadequate Plumbing	Pre-1950 and Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est LMI Proportion	Unique Deficient LMI Units
1	5,785	24,784	2,852	33,421	63.1%	21,079
2	4,795	15,002	2,500	22,297	69.1%	15,403
3	1,529	4,289	995	6,813	67.7%	4,609
4	1,891	4,102	1,055	7,048	66.0%	4,654
5	1,643	3,258	1,022	5,923	71.1%	4,213
6	887	2,312	856	4,055	59.9%	2,428
State	16,530	53,747	9,280	79,557	65.8%	52,386

3.4.2 TREND IN DEFICIENT UNITS

The current and past estimates of LMI deficient units are then compared to develop annualized trend based on the incremental change in units between the 2000 and 2011 midpoint estimates. This calculation is conducted for each municipality, and the trend established can be either positive or negative depending on the direction of the incremental change observed between 2000 and 2009-13. This incremental change is then annualized to produce an annual increment that can be extrapolated forward. Table 3.4 shows the results of this calculation at the regional level, which reflects a sum of the municipal incremental net changes. Statewide, the net change is an increase of approximately 1,100 units per year.

TABLE 3.4: ANNUALIZED NET CHANGE IN UNIQUE DEFICIENT LMI UNITS BY REGION AND STATEWIDE

Region	Unique Deficient LMI Units, 2000 Census	Unique Deficient LMI Units 2009-13 ACS	Net Change	Annualized Net Change
1	21,079	26,382	5,303	482
2	15,403	18,899	3,496	318
3	4,609	6,444	1,835	167
4	4,654	6,685	2,031	185
5	4,213	3,666	(547)	(50)
6	2,428	2,722	294	27
State	52,386	64,798	12,412	1,128

3.5 PRESENT NEED RESULTS

Finally, the annualized trend developed in Section 3.4.2 is multiplied by four to estimate the incremental change in LMI deficient units by municipality from 2011 to 2015. This increment is then applied to the municipal LMI deficient unit estimate from the 2009-2013 ACS (from Section 3.3) to yield estimated Present Need by municipality as of 2015.

The results of this calculation at the region and statewide level are shown below in Table 3.5, and results by municipality are shown in Appendix A.¹⁶ Statewide Present Need as of 2015 is estimated at approximately 69,500 units.

TABLE 3.5: ESTIMATED PRESENT NEED BY REGION AND STATEWIDE, 2015

Region	Unique Deficient LMI Units 2009-13 ACS	Net Change (4 years)	Present Need, 2015
1	26,382	1,977	28,359
2	18,899	1,331	20,230
3	6,444	679	7,123
4	6,685	749	7,434
5	3,666	(124)	3,542
6	2,722	130	2,852
State	64,798	4,742	69,540

¹⁶ Note that regional numbers are a product of the sum of municipalities. The sum of incremental change for all municipalities varies slightly from the incremental change estimated at the regional level due to rounding and also because municipal Present Need estimates are bounded at zero by definition. In cases where the incremental trend yields a negative Present Need for an individual municipality, it is replaced with a zero.

4.0 PROSPECTIVE NEED BY REGION

Prospective Need represents an estimate of the anticipated need for affordable housing units over a forward-looking ten-year period. Developing such an estimate requires defining reasonable estimates of population growth, translating population estimates into households, estimating what proportion of households are likely to qualify as LMI, and removing those LMI households that will not be eligible for affordable housing. The incremental change between the estimate of LMI households at the beginning and end of the ten-year period within each region represents regional Prospective Need. This need is then allocated to municipalities within each region (see Section 5).

Prospective Need is by definition and design forward-looking. The Fair Housing Act defines Prospective Need as “a projection of housing needs based on development and growth which is reasonably likely to occur,” (N.J.S.A. 52:27D-304(j)), echoing the structure of Prospective Need set forth in the Mt. Laurel II decision. Developing such an estimate, therefore, requires a series of projections about the growth and changes in composition of the population of each region over a ten-year period. The section that follows explains each projection and assumption employed in the context of relevant precedent and case law, and also checks the reasonableness of these projections against observed population and households trends and benchmarks for New Jersey.

The procedure proceeds in six steps to yield an estimate of regional Prospective Need, as shown in Section 4.6:

1. First, we identify the start and end date of the Prospective Need period (Section 4.1).
2. Next, we determine the projected population increase over the Prospective Need period, and the estimated proportion of that population living in households (Section 4.2).
3. Then, we estimate the headship rate, and hence the number of households associated with that population (Section 4.3).
4. Next, we estimate what proportion of households at the beginning and end of the period are low and moderate income (LMI) (Section 4.4).
5. Then, we remove LMI households who are ineligible for affordable housing due to their significant housing assets (Section 4.5).
6. Finally, we compare eligible LMI households at the start and end of the period to determine the incremental change, i.e. the Prospective Need, by region (Section 4.6).

4.1 TIME PERIOD

The first step in estimating Prospective Need is defining the appropriate time period. While Round 1 and Round 2 each covered a six year period, the Fair Housing Act has since been amended with respect to the time period. The FHA now states (in Section 307, which sets for the duties of the Council on Affordable Housing) that it is the duty of the Council to:

Adopt criteria and guidelines for...municipal determination of its present and prospective fair share of the housing need in a given region which shall be computed for a 10 year-period.

[N.J.S.A. 52:27D-307(c)(1), (emphasis added)]

Further, the FHA offers a definition of Prospective Need that clearly indicates that the calculation is forward-looking. In Section 304 (which sets forth definitions used throughout the act), the definition begins as follows:

Prospective need means a projection of housing needs based on development and growth which is reasonably likely to occur in a region or municipality...

[N.J.S.A. 52:27D-304(j), (emphasis added)]

This definition is reflective of the framework set forth by the Supreme Court in *Mount Laurel II*. In that decision, the Court similarly defined anticipated future growth as the basis for Prospective Need:

The *Mount Laurel* obligation to meet the prospective lower income housing need of the region is, by definition, one that is met year after year in the future, throughout the years of the particular projection used in calculating prospective need."

[So. Burlington County N.A.A.C.P. v. Tp. of Mount Laurel, 92 N.J. 158, 219 (1983) (emphasis added)]

While some attempts at calculating Round 3 fair share obligations have attempted to "back date" the start of the Prospective Need period to the conclusion of Round 2 in 1999, this approach is plainly at odds with the text of the FHA, which defines the period as ten years in length, and as forward-looking. Further, such a back-dated calculation creates structural problems,¹⁷ in part because the Prior Round methodologies do not envision computing Prospective Need for a period that includes both forward-looking and retrospective components in the same calculation, and in part due to the double counting that arises when the Present Need calculation does not

¹⁷ These issues are enumerated and explained in ESI's September 2015 *Review and Analysis or Report Prepared by David N. Kinsey PhD Entitled: "New Jersey Low and Moderate Income Housing Obligations for 1999 – 2025"* for the New Jersey State League of Municipalities

align with the start of the Prospective Need period. The time period for the Prospective Need period is therefore defined as July 1, 2015 to June 30, 2025.

4.2 POPULATION PROJECTIONS

Estimating incremental affordable housing need over a ten year period first requires a projection of population change during those years. Prior Round population projections are based on models developed by the New Jersey Department of Workforce and Labor Development (NJLWD). Every other year, the NJLWD produces a twenty year forecast of population growth using four different models (“Economic Demographic,” “Historic Migration,” “Net Migration” and “Linear Regression”). Projections start in the most recent year for which population estimates from the Census are available and project population in five-year increments. The most recent set of projections is available for 2012-2032, using the Census population estimate for 2012 and offering projections for 2017, 2022, 2027 and 2032. The Round 1 methodology utilized population projections from the NJLWD Historic Migration model, while the Round 2 methodology averaged statewide population projections from the Historic Migration and Economic Demographic models, and then adjusted the share of that population growth applied to each County using a proprietary model from the Center for Urban Policy Research (CUPR) at Rutgers. The Round 2 methodology explains its decision to average outputs of the two projection models by noting that “Retrospectively, averaging has given the most accurate results over time.” (26 N.J.R 2347)

As suggested by this passage, it is useful to take the past performance of projection models relative to observed population growth as a consideration in setting appropriate future population projections.

Historic Population Projections

NJLWD has provided ESI with a time series of the past seven twenty-year population projections yielded by each of its four models. NJLWD’s website provides a document titled *Methodology – The Projection Models*¹⁸ which describes the assumptions underlying each model. Assumptions regarding base population, fertility and mortality, cohort aging, and migration of the population 65 and older are identical in the Economic Demographic and Historic Migration models. They differ in their treatment of migration of persons under 65 years old. NJLWD’s methodology explains the difference as follows (in its description of the Historic Migration model relative to the Economic Demographic):

Rather than inferring migration under age 65 by economic factors, the Historical Migration Model applies the past net migration rates directly to the population distributed at each projection interval.

[NJLWD, “Methodology – The Projection Models”]

¹⁸ Available online at: (<http://lwd.dol.state.nj.us/labor/lpa/dmograph/lproj/method22.doc>)

Within the methodology summary, NJLWD states its rationale for providing projections from both of these models:

The only difference between the Historical Migration Model and the Economic-Demographic Model is the migration assumptions. The projected population from these two models may be used as a range for possible population change in the future.

[NJLWD, “Methodology – The Projection Models” (emphasis added)]

Using the data set provided by NJLWD, it is possible to identify 12 unique five-year projection periods from which compound annual growth rates¹⁹ (CAG) projected by the NJLWD can be compared to observed Census data for those periods. The results of this comparison are shown in Table 4.1.

TABLE 4.1: STATEWIDE POPULATION PROJECTIONS: NJLWD MODELS VS. OBSERVED CENSUS POPULATION ESTIMATES

Projection Base Year	Projection Period	Census Estimates		Economic Demographic (ED)		Historic Migration (HM)		Averaged (ED & HM)	
		Comparable Time Period	CAG	CAG	CAG vs. Census	CAG	CAG vs. Census	CAG	CAG vs. Census
2000	2000-2005	2000-2005	0.52%	0.74%	43%	0.68%	31%	0.71%	37%
2000	2005-2010	2005-2010	0.34%	0.72%	111%	0.68%	97%	0.70%	104%
2000	2010-2015	2010-2014	0.38%	0.74%	93%	0.78%	104%	0.76%	99%
2002	2002-2007	2002-2007	0.29%	0.84%	190%	0.93%	218%	0.89%	204%
2002	2007-2012	2007-2012	0.45%	0.72%	60%	0.88%	95%	0.80%	78%
2004	2004-2009	2004-2009	0.28%	0.50%	78%	0.60%	116%	0.55%	97%
2004	2009-2014	2009-2014	0.41%	0.63%	54%	0.59%	44%	0.61%	49%
2006	2006-2011	2006-2011	0.41%	0.35%	-15%	0.70%	71%	0.52%	28%
2006	2011-2016	2011-2014	0.36%	0.56%	55%	0.57%	57%	0.56%	56%
2008	2008-2013	2008-2013	0.45%	0.32%	-28%	0.27%	-40%	0.30%	-34%
2010	2010-2015	2010-2014	0.38%	0.50%	31%	0.44%	16%	0.47%	24%
2012	2012-2017	2012-2014	0.35%	0.39%	13%	0.36%	3%	0.38%	8%
AVG			0.39%	0.58%	52%	0.62%	62%	0.60%	57%

¹⁹ Compound annual growth rates are preferred in this comparison to raw population estimates because the Census Bureau frequently “re-bases” prior population estimates, and does not hold population levels consistent across decennial Census periods. Compound annual growth rates provide a common benchmark of projection accuracy given the best information available at the time (i.e. not “penalizing” a projection for retroactive changes to the base year population) and allow for a consistent data set to be constructed across decennial Census periods. They also allow for a comparison of annualized growth rates for time periods with portions yet to be completed.

Table 4.1 illustrates that bi-annual projections from both the Economic Demographic and Historic Migration models have consistently overstated future population growth over the time period analyzed. On average, projections from the Economic Demographic model have overstated population growth observed in the Census by 52%, projections from the Historic Migration model by 62%, and the average of the two models by 57%. However, projections for each model, and in particular the Historic Migration model, appear to be more accurate for recent periods. For the current twenty-year horizon, the Historic Migration model projects a more conservative growth trend than the Economic Demographic model (see Figure 4.1 below).

The significant overstatement of growth in the NJLWD's historic population forecasts are a concern in generating an accurate Prospective Need estimate, since population growth (translated into household growth) is ultimately the driver of incremental affordable housing need. Naturally, future population growth is unknown, and no projection approach is perfect, but it is necessary to arrive at a realistic estimate to proceed with this calculation. One option would be to apply a downward adjustment to NJLWD population forecasts using additional data sources, as was undertaken in the un-adopted 2014 Round 3 rules for COAH.²⁰

The second option is follow the Round 2 approach of averaging the output of the Historic Migration and Economic Demographic models. While historically, averaging the two models appears to produce a similar over-estimate of population as using the "preferred" Economic Demographic model alone, within the 2012 to 2025 forecast period (i.e. from the base year for the current projection period to the end of the Prospective Need period), the averaged output of the two models yields a growth rate 25 percent below the growth rate of the Economic Demographic model alone. In addition to following the Prior Round, this approach is supported by the NJLWD's recommendation that "these two models may be used as a range for possible population change in the future." This approach is therefore preferred to applying a downward adjustment to NJLWD projections, and is used as the output for the population forecast in this procedure.

2015 and 2025 Population Projections

As previously noted, current population projections from NJLWD have a base year of 2012 and provide projections in five year increments through 2032. For the purpose of the Prospective Need period, it is necessary to interpolate forecasts for 2012 and 2032 using a midpoint approach. Results of this procedure are shown in Figure 4.1. Figure 4.2 compares the annual statewide population growth trend from 2000-2014 (as reported by the Census), projected growth from the NJLWD Economic Demographic model over that time (as shown in Table 4.1) and into the future, and the projected annualized growth over the 2015 – 2025 Prospective Need period used in this analysis, based on the average of the Historical Migration and Economic Demographic model projections.

²⁰ See: "Technical Appendices: Third Round Substantive Rules, pages 10-11" (2014)

FIGURE 4.1: NJLWD STATEWIDE POPULATION PROJECTIONS FOR PROSPECTIVE NEED PERIOD

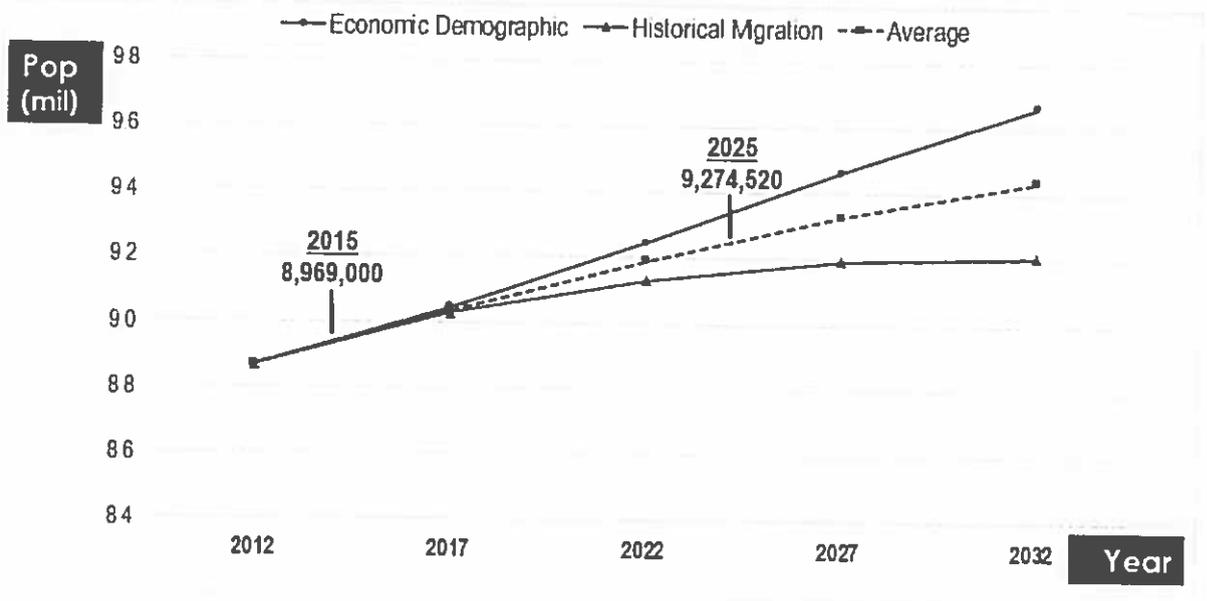
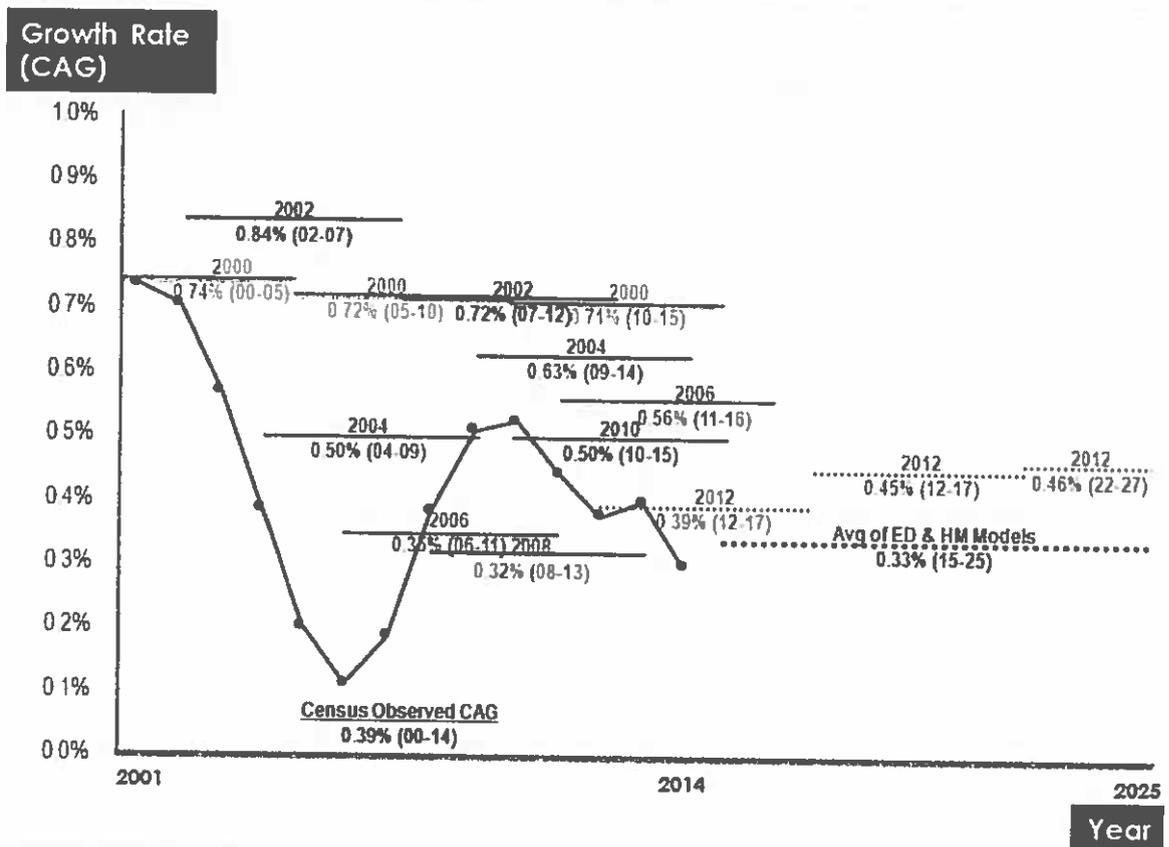


FIGURE 4.2: STATEWIDE OBSERVED POPULATION GROWTH AND NJLWD PROJECTIONS



In the case of the Economic Demographic model, which is issued by county and age cohort for each five-year increment, projections are interpolated to yield results for 2015 and 2025 by annualizing the population growth increment for each county and age cohort combination and applying the appropriate increment (for example, 3/5 of the projected growth from 2022 to 2027 is applied to the 2022 projection to interpolate the 2025 projections for each county and cohort). In the case of the Historical Migration projection, which is currently only provided on a statewide level by NJLWD, the annualized approach is applied statewide (for example 3/5 of the population change from 2022 to 2027 is applied to the 2022 projection to interpolate the 2025 projection). Results are shown in Table 4.2.

TABLE 4.2: NJLWD STATEWIDE POPULATION PROJECTIONS

NJLWD Model	2012	2015 (interpolated)	2017	2022	2025 (interpolated)	2027
Economic Demographic	8,867,749	8,974,040	9,044,200	9,247,300	9,377,040	9,463,600
Historic Migration	8,867,749	8,963,960	9,028,100	9,131,900	9,170,000	9,195,400
Averaged	8,867,749	8,969,000	9,036,150	9,189,600	9,273,520	9,329,500

The averaged interpolated statewide projection from the two models is then translated into an age cohort and county distribution. To do so, the share of statewide population for each of the 168 age and count cohort combinations yielded by the interpolated Economic Demographic model is applied to the total statewide population estimate from the average of the interpolated Economic Demographic and Historic Migration models. Projected population growth by housing region between 2015 and 2025 yielded by this approach is shown in Table 4.3. The statewide population is projected to grow by approximately 305,000 over this ten-year period.

TABLE 4.3: PROJECTED POPULATION GROWTH 2015-2025 BY REGION AND STATEWIDE²¹

Region	Projected Population 2015	Projected Population 2025	Projected Increase	Projected Growth %
1	2,263,030	2,382,880	119,850	5.3%
2	1,956,860	2,015,420	58,560	3.0%
3	1,298,890	1,363,280	64,390	5.0%
4	1,591,250	1,632,620	41,360	2.6%
5	1,263,760	1,284,320	20,560	1.6%
6	595,190	595,000	(200)	0.0%
State	8,969,000	9,273,520	304,520	3.4%

²¹ Throughout this Section, population projections shown are rounded to the nearest ten. As a result, figures in the table may not sum precisely. Exact figures are used in the model as the basis of the calculation.

4.2.1 POPULATION IN HOUSEHOLDS

The base unit of the calculation of affordable housing need is households, rather than total population. Therefore, it is necessary to perform additional calculations with the population projection discussed in the previous section. The first, and most straightforward, is the estimation of the total population living in households. This is performed by deducting those “non-householders” that the Census Bureau classifies as living in “group quarters.” These group quarters include correctional facilities, nursing homes, college dormitories, military quarters, mental hospitals, and other such group facilities. The full population of the state is classified as either in a household or in group quarters, so estimating and deducting the group quarters population from the total population yields an estimate of the population in households.

The group quarters population is most accurately reported at the county and age cohort level in the decennial Census. Therefore, the proportion of the population in group quarters from the 2010 Census (the most recent available) is carried forward by age cohort and county, adjusted for the countywide group quarters populations reported in the 2014 ACS, and applied to the population projections for 2015 and 2025. This approach results in a relatively stable projection of the group quarters population over time, with the figures increasing slightly with population growth, and also varying slightly due to changes in the distribution of projected population between the county and age cohorts, even as the group quarters rate within those cohorts is held constant (see Figure 4.3 and Table 4.4). As a result of this modest growth in the group quarters population, the statewide population in households is anticipated to grow by approximately 293,000 between 2015 and 2025, slightly less than the total population growth projections of approximately 305,000.²²

²² It is worth noting that prior iterations of the Round 3 rules (both the “Growth Share” versions struck down by the Courts and the un-adopted 2014 iteration) included a calculation of additional Prospective Need generated by the population currently in group quarters as they return to the household population over the projection period. This component is not a part of the Round 1 or Round 2 methodology. While it is easy to identify members of the population that might fit this description (such as college students), conceptually, its inclusion as an additive element of housing need is badly flawed. Since people in group quarters and people in households sum to the total population of the state, the relevant metric for determining households and therefore housing need is the net effect of group quarters on the population. Over a ten-year period, there will no doubt be considerable churn between the household and group quarters populations among specific individuals, who enter and exit universities, correctional facilities, military quarters, etc. as their life circumstances change. On balance, however, those individuals exiting group quarters and re-joining the population in households are replaced by an approximately equal number of people exiting the population in households and joining the population in group quarters. The proportional approach to estimating the population in households described above includes both sides of this equation, implicitly assuming that the population entering and exiting group quarters stays in balance as a proportion of the population for each age group and county. Said another way, the population exiting group quarters is already accounted for in this methodology (note they are included in the overall population estimate, from which the estimated group quarters proportion is deducted), and to create a separate and additive calculation of Prospective Need for this calculation is a clear instance of double counting. It is therefore not undertaken in this procedure, in keeping with the Round 1 and Round 2 methodology.

FIGURE 4.3: STATEWIDE POPULATION IN HOUSEHOLD PROJECTION, 2015-2025

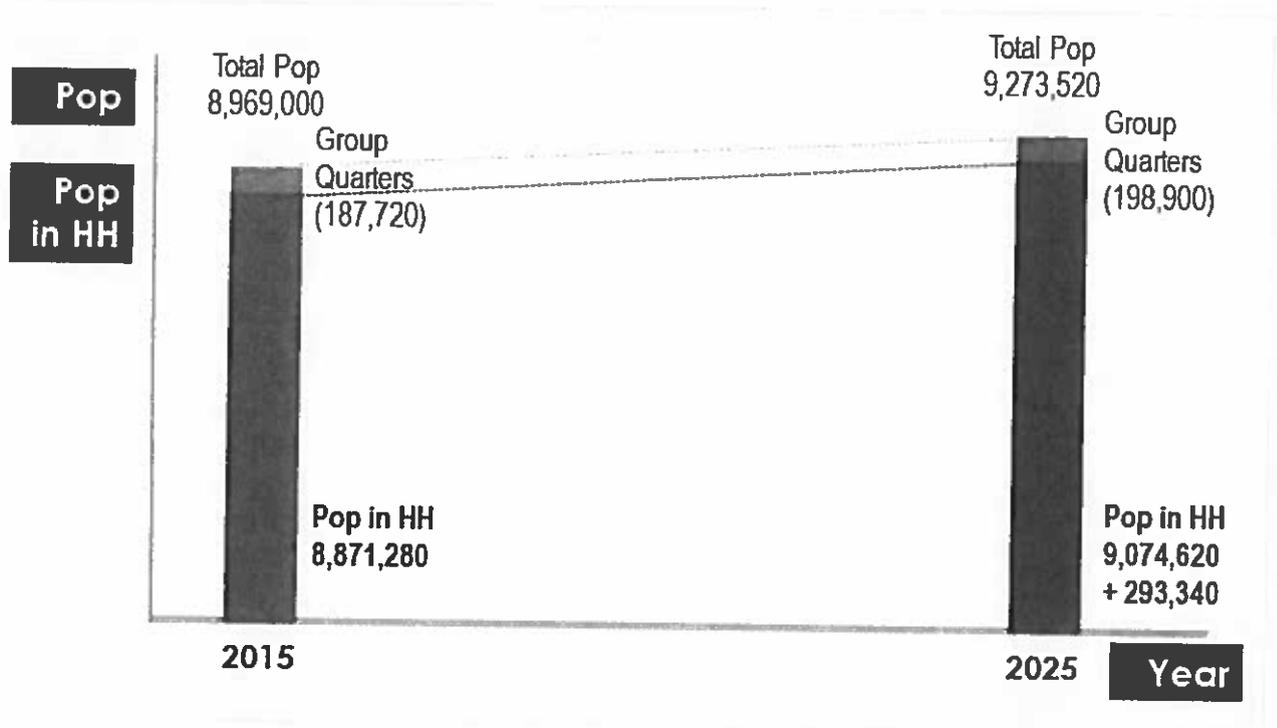


TABLE 4.4: PROJECTED POPULATION IN HOUSEHOLDS 2015-2025 BY REGION AND STATEWIDE

Region	Projected Population 2015	Group Quarters Rate	Population in HH 2015	Projected Population 2025	Group Quarters Rate	Population in HH 2025	Pop in HH Increase 2015-2025
1	2,263,030	1.38%	2,231,870	2,382,880	1.45%	2,348,410	116,540
2	1,956,860	2.00%	1,917,820	2,015,420	2.03%	1,974,450	56,630
3	1,298,890	3.03%	1,259,560	1,363,280	3.11%	1,320,900	61,340
4	1,591,250	1.96%	1,559,990	1,632,620	2.00%	1,599,930	39,940
5	1,263,760	1.89%	1,239,890	1,284,320	1.94%	1,259,380	19,490
6	595,190	3.87%	572,150	595,000	3.94%	571,550	(610)
State	8,969,000	2.09%	8,781,280	9,273,520	2.14%	9,074,620	293,340

4.3 HEADSHIP RATES AND HOUSEHOLDS

The next step in the procedure is to translate the estimate of the population in households to an estimate of the number of households, which forms the base unit for the estimation of incremental affordable housing need. This step is done in the Prior Round methodology and in this procedure by developing an estimate of the “headship rate” and applying it to the projection of the population in households. The “headship rate” is the probability that a given individual is a head of a household, or “householder.” Mathematically, the headship rate is the number of households divided by the population in households.²³

Headship rates can vary due to a variety of social, economic and demographic factors. Headship rates are positively correlated with age (most notably because children are rarely the head of a household, but also generally continuing to increase throughout working years and into retirement years), so a projection of future headship rates must take into account the changing age distribution of the population (the New Jersey population has in aggregate been aging for years and is projected to continue to do so). However, headship rates within age cohorts may also change moving forward for several reasons. These reasons include economic factors, such as student debt and economic challenges which have caused an uptick in the proportion of the millennial generation staying in or moving back into their parent’s households. They also include long-term societal and generational trends like longer and healthier lifespans (which reduce the proportion of widows and sole householders among the elderly) and the continued increase in the age of first marriages and children.

The Round 2 methodology sets forth an approach that accounts for both changes across age cohorts and trends within age cohorts in developing its projection of headship rates. It is described as follows:

Headship rates are determined by age group and county in New Jersey in 1990 and extended into the future at one-half the rate of change observed from 1980 to 1990.

[26 N.J.R. 2347]

Within each age cohort, therefore, the trend from the prior period is carried forward, with a downward adjustment. Simultaneously, the redistribution of the population across age cohorts and counties is incorporated. This is accomplished by multiplying the projected headship rate in each age cohort and county by the projected population in households associated with that age and county combination. This calculation yields an estimate of households. Therefore, the

²³ This can also be expressed as $\text{Headship Rate} = (1 / \text{Avg. Household Size})$

headship projection is not a single statewide rate but rather 168 individualized rates, which will yield a new “effective” headship rate based on the changing distribution of population.²⁴

Updating the Round 2 approach involves identifying the appropriate trend in headship rates to apply forward to the Prospective Need period. The most up to date data on current headship rates by county is drawn from the 2014 One-Year American Community Survey (ACS), which reports a statewide headship rate of 36.5%. The first year for which ACS data using the current (and therefore comparable) sampling methodology is available is the 2005 One-Year ACS. The statewide headship rate in 2005 was year was 37.7%, indicating a downward trend over the past decade.²⁵ As shown Figure 4.4, the headship rates indicated by the ACS One-Year samples show variation from 2005 to 2007, and then indicate a consistent downward trend from 2008 to 2014. Another potential source for headship rate trends is the decennial Census, which indicates that the overall statewide headship rate was effectively flat from 2000 to 2010, increasing slightly from 37.3% in 2000 to 37.4% in 2010. Within cohort headship rates declined over this Census period for nearly all age cohorts, but were offset by changes in the population distribution (due to the aging population).

Literature on the comparability of ACS and Census data suggests systematic difference in household counts for the overlapping year of 2010, with the Census *level* considered to be more reliable. Our analysis (adopting an approach proposed by Dr. David Kinsey) therefore re-bases ACS household estimates the Census base, allowing for the most reliable data source (Census) to be combined with the most up to date data source (ACS) to yield an estimated statewide headship rate of 37.1% for 2014. This trend is less steep than the trend implied by the 2005-2014 ACS, and more steep than the trend implied by the 2000-2010 Census alone.

The Round 2 methodology applies half of the rate of change observed over a ten-year period to formulate its projection for the Prospective Need period. As noted above, while the statewide headship rate is relatively flat over the prior period, within age cohort headship rates have declined consistently, more than offsetting the population aging that has taken place to result in a slight decrease in the headship rate. We follow this Prior Round method, adjusting for the different observation and projection periods. Here, the observation period is 14 years (2000 to 2014) and the extrapolation period is 1 year and 11 years (from known 2014 rates to projected 2015 and 2025 rates). The rate of change applied is reduced proportionally to 40% of the observed change from the prior period for the 2025 projection, and 4% for the 2015 projection.²⁶

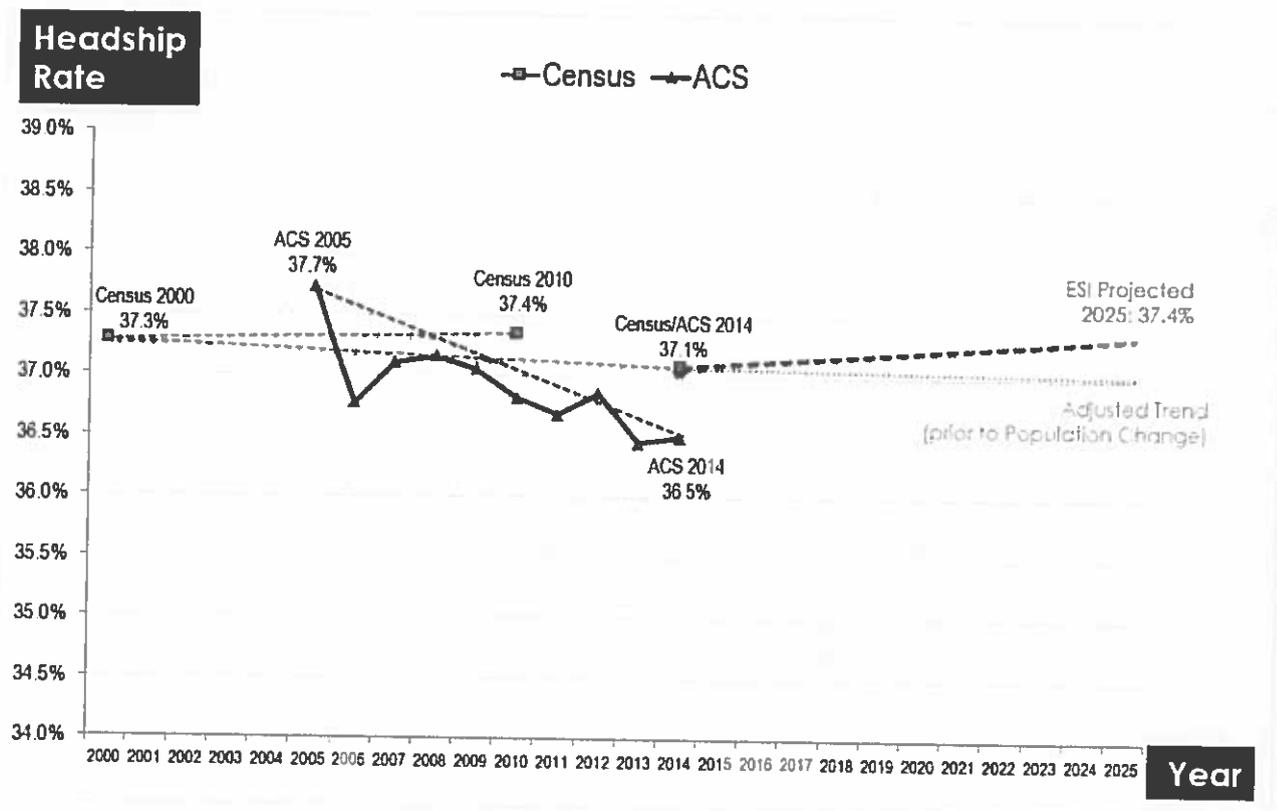
²⁴ Note that the effective rate changes due to changes in the population distribution even if the headship rate within each age cohort and county is assumed to stay flat. The only way to produce a truly constant statewide headship rate irrespective of the population distribution is to apply a single statewide rate.

²⁵ Since population in household was not reported in the 2005 One-Year ACS, the statewide group quarters proportion of the population from 2006 was applied to 2005 to develop this estimate.

²⁶ Calculated precisely, the Round 2 methodology’s application of 50% of a ten year change to a nine-year period (from 1990 Census data to a 1999 end date) computes to a rate of 0.556 (i.e. 5/9) of observed change per year of extrapolation. Applying this same ratio in this instance yields a rate of .437 $[(5/9) / (14/11)]$. Applying a rate of 50% per year yields a ratio of .393 $[(1/2) * (11/14)]$.

The resulting headship rates for each age cohort and county are then multiplied by the headship rate to arrive at a projection of the number of households headed by members of that age and county combination in 2025. The effective headship rate yielded by this procedure is 37.4% for 2025, a slight increase from the 37.1% statewide rate from 2014 (see Figure 4.4). This result indicates that the within-age cohort trend is slightly outweighed by the between-age cohort population distribution changes in this projection.

FIGURE 4.4: STATEWIDE HEADSHIP RATE TREND AND PROJECTIONS



Set against the population in household projections shown in Table 4.4, the projected headship rates yield an estimate of household growth by region across this period totaling approximately 137,000 statewide (see Table 4.5).

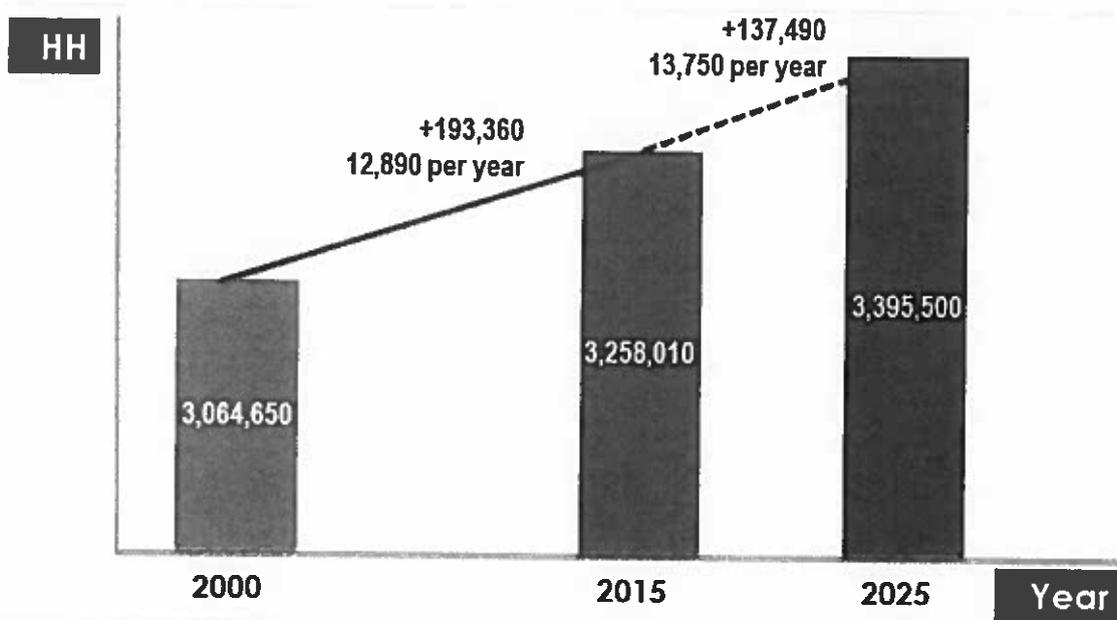
Recognizing that this percentage as applied in the Prior Round was rounded, and not the result of this sort of precise calculation, 40% is used for the 2025 projection, and 4% for extrapolating from 2014 to 2015.

TABLE 4.5: HEADSHIP RATES AND HOUSEHOLDS 2015-2025 BY REGION AND STATEWIDE

Region	Pop in HH 2015	Headship Rate	Households 2015	Pop in HH 2025	Headship Rate	Households 2025	HH Increase 2015-2025
1	2,231,870	36.9%	824,560	2,348,410	37.0%	868,310	43,750
2	1,917,820	36.7%	703,400	1,974,450	37.3%	735,970	32,580
3	1,259,560	35.8%	451,520	1,320,900	35.8%	473,180	21,660
4	1,559,990	37.6%	587,300	1,599,930	37.8%	604,160	16,860
5	1,239,890	37.8%	468,450	1,259,380	38.8%	489,160	20,710
6	572,150	38.9%	222,780	571,550	39.3%	224,720	1,930
State	8,781,280	37.10%	3,258,010	9,074,620	37.42%	3,395,500	137,490

The methodology described above for population projections, group quarters estimates, and headship rates is based on the approach employed in Round 2. It is also useful to examine the reasonableness of the projections that it yields relative to observed population and household growth trends in New Jersey. Figure 4.5 shows that from 2000-2015, New Jersey saw an increase of approximately 193,000 households or 12,900 households per year.²⁷ The household forecast methodology described above yields an annualized estimate of approximately 13,750 incremental households per year, slightly higher than (and broadly in line with) the current observed trend.

FIGURE 4.5: PROJECTED STATEWIDE POPULATION AND HOUSEHOLD GROWTH RELATIVE TO PRIOR PERIOD



²⁷ Note that 14/15th of this time period is represented by observed Census Bureau data, with projections for 2015 only.

4.4 MEDIAN INCOME AND LMI PROPORTION

Once the projected number of households at the start and at the end of the Prospective Need period has been determined, the next step is to estimate the proportion of those households that qualify as low or moderate income at each point in time. This step yields an estimated number of LMI households at the beginning and end of the prospective period. The difference between these figures is the incremental LMI household growth.

Multiple challenges must be addressed to perform this calculation correctly. The first is properly defining the median income and the LMI thresholds. The second is accounting for changes in the population distribution over the course of the Prospective Need period relative to the LMI thresholds. The methodology employed for both of these aspects in the Prior Round is highly problematic, with clear conceptual and statistical flaws. In order to correct these flaws, this analysis develops and executes a new procedure consistent with both applicable law and statistical principles.

4.4.1 DEFINING MEDIAN INCOME

The Fair Housing Act offers definitions of low and moderate income housing which form the textural basis for defining median income and LMI thresholds in the calculation of affordable housing obligations. The FHA defines moderate income housing²⁸ as follows:

“Moderate income housing” means housing affordable according to federal Department of Housing and Urban Development or other recognized standards for home ownership and rental costs and occupied or reserved for occupancy by households with a gross household income equal to more than 50% but less than 80% of the median gross household income for households of the same size within the region in which the housing is located.

[N.J.S.A. 52:27D-304(d)]

Prior Round methodologies have determined regional median incomes according to the procedures employed by the federal Department of Housing and Urban Development (HUD), as suggested in the first clause of the definition in FHA. However, the language suggests that HUD standards are not the only option for defining LMI households. Rather, the definition may use HUD standards or “other recognized standards for home ownership and rental costs,” providing that units are “occupied or reserved for occupancy by households with a gross household income equal to more than 50% but less than 80% of the median gross household income for households of the same size within the region in which the housing is located.”

²⁸ The discussion below focuses on the definition of “moderate income housing,” since the threshold for this group forms the upper bound on the statistical LMI definition. The definition of “low income housing” is parallel in construction and in concept to the definition of moderate income. The income threshold for low income housing is simply set at “50% or less of the median,” rather than “more than 50% but less than 80% of the median” for moderate income housing (N.J.S.A 52:27D-304 c).

An analysis of household income definitions and data, undertaken below, demonstrates that the procedure utilized by HUD (and adopted by COAH) does not in fact properly identify “households with a gross household income equal to more than 50% but less than 80% of the median gross household income for households of the same size within the region in which the housing is located.” This indicates that an alternate standard should be developed that does satisfy that requirement.

The LMI standard utilized in the Prior Round methodology is based on a transformation of income thresholds defined by the HUD. HUD defines median family income for a family of four in each county. The Prior Round methodology then multiplies this figure by the number of households in each county, sums this number with the parallel number from the other counties in the region, and divides the total by the total number of households in each region. This process produces what the Prior Round methodology calls “the region weighted average of median income for a household of four” (26 N.J.R. 2332). This estimated median for a family of four is then adjusted based on a “factor,” or multiplier, supplied by HUD to adjust median income for household sizes smaller and larger than four.²⁹ The LMI threshold for the purpose of estimating affordable housing need is then calculated as 80% of this adjusted estimate of the median for each household size. This threshold is then compared to household income data from the ACS to estimate the proportion of LMI households.

Serious statistical problems arise from this methodology. The first is an intermixing and comparison of non-like data sources. A HUD standard, which uses median *family* income, is used to establish an income threshold against which median *household* income is compared.³⁰

Another major statistical issue is the factors applied to adjust this threshold up (for household sizes above four) and down (for household sizes below four). Unfortunately, these factors do not reflect the actual relationships between median household incomes for various household sizes. Table 4.6 below shows the median income by household size and region used by COAH to compute LMI thresholds, while Table 4.7 shows median income by household size and region as reported in 2014 One-Year ACS data.

²⁹ For example, the factor is 0.9 for a family of three, meaning that the median income threshold is set to 90% of the median income defined for a family of four. See the bottom row of Table 4.6 for the full list of factors applied.

³⁰ This issue was identified by Regional Special Master Richard Reading in the October 30th *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities* as “intermixing results.” In discussing Dr. Kinsey’s use of HUD and ACS data in his methodology for FSHC, the Special Master writes: “Dr. Kinsey’s calculation of LMI ratio uses different sources for estimating the number of households (ACS) and for establishing the low- and moderate income levels (HUD Section 8 household size/family income qualification criteria). These are different sources that are compiled for different purposes” (page 25)

Dr. Kinsey himself does not dispute this claim, writing in his October 28th *Response to Special Regional Master’s Inquiry on Qualifying Low and Moderate Income Households in the Fair Share Methodology* that: “Because income qualification of LMI HH’s under the Prior Round methodology is not based on the actual median income of New Jersey households (3.2. million), but rather is based on HUD’s estimate of the median income of New Jersey families (2.2 million), with adjustments by family size, it is not necessarily the case that exactly 40% of households will be at less than 80% of median family income.” (p. 10, emphasis in original).

TABLE 4.6: HUD/COAH MEDIAN INCOME CALCULATION BY HOUSEHOLD SIZE AND REGION, 2014

Region	Household Size ³¹							
	1	2	3	4	5	6	7	8+
1	\$59,095	\$67,538	\$75,980	\$84,422	\$91,176	\$97,930	\$104,683	\$111,437
2	\$63,430	\$72,492	\$81,553	\$90,614	\$97,864	\$105,113	\$112,362	\$119,611
3	\$73,500	\$84,000	\$94,500	\$105,000	\$113,400	\$121,800	\$130,200	\$138,600
4	\$64,830	\$74,091	\$83,353	\$92,614	\$100,023	\$107,432	\$114,841	\$122,250
5	\$57,050	\$65,200	\$73,350	\$81,500	\$88,020	\$94,540	\$101,060	\$107,580
6	\$51,085	\$58,383	\$65,681	\$72,979	\$78,817	\$84,656	\$90,494	\$96,332
Factor	0.7	0.8	0.9	1	1.08	1.16	1.24	1.32

TABLE 4.7: MEDIAN HOUSEHOLD INCOME BY HOUSEHOLD SIZE BY REGION, 2014 ACS

Region	Household Size						
	1	2	3	4	5	6	7+ ³²
1	\$35,150	\$75,420	\$85,300	\$100,000	\$94,400	\$103,400	\$98,200
2	\$34,000	\$78,400	\$90,000	\$107,500	\$103,100	\$96,400	\$92,000
3	\$44,400	\$85,900	\$100,500	\$127,000	\$120,400	\$150,000	\$82,020
4	\$32,400	\$78,400	\$97,290	\$109,660	\$120,000	\$101,004	\$99,600
5	\$31,200	\$76,800	\$96,600	\$112,900	\$97,700	\$102,500	\$111,200
6	\$25,000	\$61,200	\$67,500	\$86,200	\$69,900	\$49,500	\$72,600

The COAH calculation implies, for example that one-person households have a median income 7/8 as high as that two-person households (since the median calculation is to multiply the four-person household benchmark by 0.7 for a one-person household and by 0.8 for a two-person household). ACS data, however, shows that median household incomes for two-person households are in fact more than twice as high as that of one-person households in every region in New Jersey.³³ As a result, median incomes estimated for one-person households in every

³¹ We note that COAH's published income limits refer to "persons" rather than "household size." Since the affordable housing eligibility limits in the FHA are defined relative to household size, and this definition is incorporated into this methodology and the associated ACS data used for analysis, the term "household size" is used throughout this section for consistency.

³² Due to sample size limitations for households of 8 persons or larger at the county level, LMI calculations from ACS data throughout this section aggregate all households of 7 persons or larger into one category.

³³ This is likely reflective of the fact that two-person households tend to have dual earners, and may tend to correlate with other markers of higher earnings, such as age or marital status. Regardless of the causal mechanism, it is unquestionably true according to Census data.

TABLE 4.8: PROPORTION OF HOUSEHOLDS BELOW HUD/COAH MEDIAN INCOME BY HOUSEHOLD SIZE BY REGION AND STATEWIDE, 2014

Region	State	Household Size							
		1	2	3	4	5	6	7	8+
1	51.4%	70.1%	44.9%	45.3%	42.3%	48.7%	46.5%	52.2%	66.3%
2	53.6%	75.4%	46.2%	45.5%	40.3%	47.4%	50.6%	62.7%	57.5%
3	52.2%	73.4%	49.2%	45.6%	38.5%	46.4%	43.8%	81.9%	65.5%
4	53.2%	76.1%	47.4%	41.8%	40.9%	41.2%	53.9%	57.4%	59.5%
5	48.5%	75.5%	42.3%	36.5%	32.6%	42.4%	45.3%	45.0%	33.3%
6	55.4%	75.6%	47.4%	49.1%	40.9%	57.5%	62.1%	73.2%	37.0%
State	52.2%	74.0%	46.1%	43.8%	39.6%	46.4%	49.3%	60.8%	57.4%

TABLE 4.9: PROPORTION OF HOUSEHOLDS BELOW HUD/COAH LMI THRESHOLD BY HOUSEHOLD SIZE BY REGION AND STATEWIDE, 2014

Region	State	Household Size							
		1	2	3	4	5	6	7	8+
1	42.4%	60.9%	36.1%	37.3%	33.3%	38.3%	34.9%	50.5%	41.0%
2	44.4%	66.2%	37.1%	35.5%	31.4%	38.6%	48.2%	44.3%	55.0%
3	42.5%	63.2%	39.4%	36.6%	29.1%	36.0%	34.4%	72.3%	55.6%
4	42.9%	67.3%	35.7%	30.9%	30.8%	33.1%	41.9%	52.4%	45.1%
5	39.2%	66.4%	33.5%	26.3%	24.5%	31.9%	31.1%	39.4%	25.7%
6	46.2%	68.1%	36.4%	37.5%	34.6%	48.4%	60.2%	62.2%	35.6%
State	42.7%	64.9%	36.3%	34.2%	30.6%	36.8%	39.8%	52.6%	45.2%

As shown in Table 4.9, 65% of one-person households statewide are estimated to have incomes below the regional LMI threshold for their household size (which are shown in Table 4.10). By contrast, far less than 40% of households with 2-5 people are estimated as LMI. Statewide, 42.7% of households are estimated to be LMI under this method, which follows directly from the 52.2% of households that are (incorrectly) estimated to be below the median income (see Figure 4.7).

region using the HUD standards are well above (in some cases nearly double) the actual median income for one-person households in those regions. Conversely, median incomes do not always rise linearly with increasing household size. The medians estimated by the HUD standard for large households are well above the actual median income for those household sizes in most regions, but below the actual median income for households of two to four persons.

FIGURE 4.6: COMPARATIVE 2014 MEDIAN INCOME ESTIMATES BY HOUSEHOLD SIZE, REGION 1

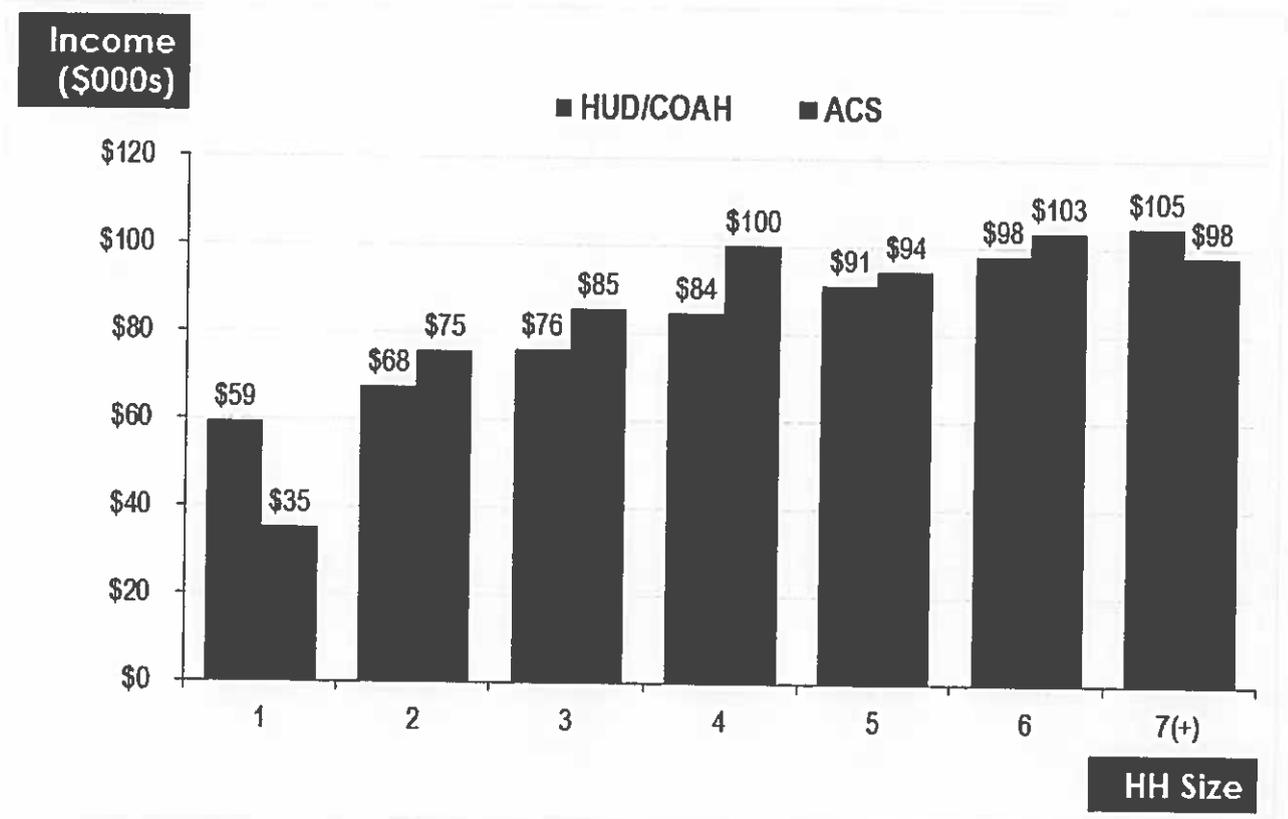


Table 4.8 shows that as a result of these definitional issues, ACS data indicates that more than 70% of one-person households in each region have a household income below the HUD/COAH median. Statewide, 52.2% percent of households have incomes lower than the HUD/COAH median for their household size, which of course violates the statistical principle of a median. This flawed median thereby produces a flawed calculation of LMI households based on income thresholds set at 80% of that median.

FIGURE 4.7: PROPORTION OF STATEWIDE HOUSEHOLDS BELOW HUD/COAH 2014 MEDIAN INCOME AND LMI THRESHOLDS

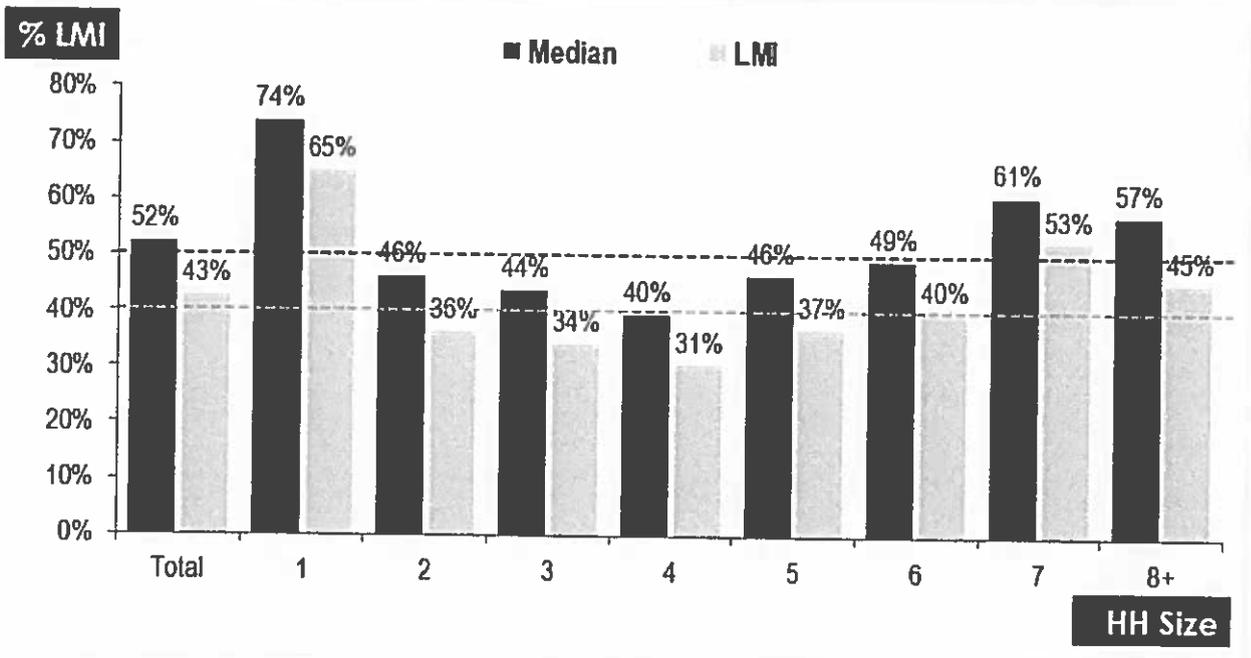


TABLE 4.10: HUD/COAH LMI THRESHOLD BY HOUSEHOLD SIZE AND REGION, 2014

Region	Household Size							
	1	2	3	4	5	6	7	8+
1	\$47,276	\$54,030	\$60,784	\$67,538	\$72,941	\$78,344	\$83,747	\$89,150
2	\$50,744	\$57,993	\$65,242	\$72,492	\$78,291	\$84,090	\$89,890	\$95,689
3	\$58,800	\$67,200	\$75,600	\$84,000	\$90,720	\$97,440	\$104,160	\$110,880
4	\$51,864	\$59,273	\$66,682	\$74,091	\$80,018	\$85,946	\$91,873	\$97,800
5	\$45,640	\$52,160	\$58,680	\$65,200	\$70,416	\$75,632	\$80,848	\$86,064
6	\$40,868	\$46,707	\$52,545	\$58,383	\$63,054	\$67,725	\$72,395	\$77,066
Factor	0.7	0.8	0.9	1	1.08	1.16	1.24	1.32

This definitional problem is not simply a statistical one. The FHA defines moderate income housing as “reserved for occupancy by households with a gross household income...less than 80% of the median regional gross household income for households of the same size within the region...” (N.J.S.A. 52:27D-304d). The HUD/COAH standard plainly fails that test. For example, the regional median income for three-person households in Region 1 is \$85,300 according to 2014 ACS (as shown in Table 4.7), and 80% of that amount is \$68,240. A three-person household in Region 1 with a household income of \$65,000 earns less than 80% of the regional

median income but nonetheless is excluded from the projection of regional need under the HUD/COAH standard, which sets the LMI threshold for a three-person households in Region 1 at \$60,784 (as shown in Table 4.10). By contrast, a one-person household in Region 2 with a household income of \$50,000 (nearly 50% above the actual median income for one-person households in Region 2 of \$34,000 shown in Table 4.7) is considered LMI under the HUD/COAH calculation.

The solution to this definitional problem is straightforward – to calculate median household incomes directly from One-Year 2014 ACS data for each household size and region. This approach eliminates the mismatch between family and household incomes, eliminates the need for county data to be weighted to a regional average, and eliminates the flawed household size factors by using observed data for each household size to calculate a unique median. Then, in keeping with the FHA, LMI thresholds are set at 80% of this median household income for each household size by region. Table 4.11 shows the resulting LMI income thresholds for each region and household size.

TABLE 4.11: LMI THRESHOLD (80% OF MEDIAN) BY HOUSEHOLD SIZE BY REGION, 2014 ACS

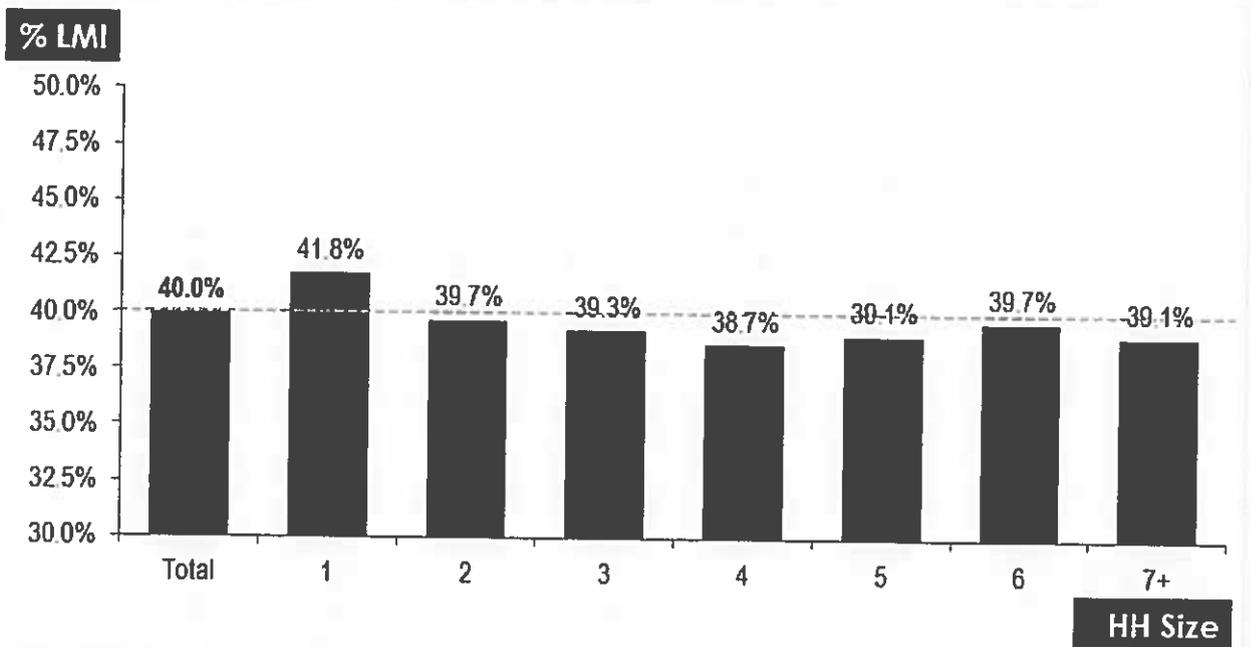
Region	Household Size						
	1	2	3	4	5	6	7+
1	\$28,120	\$60,336	\$68,240	\$80,000	\$75,520	\$82,720	\$78,560
2	\$27,200	\$62,720	\$72,000	\$86,000	\$82,480	\$77,120	\$73,600
3	\$35,520	\$68,720	\$80,400	\$101,600	\$96,320	\$120,000	\$65,616
4	\$25,920	\$62,720	\$77,832	\$87,728	\$96,000	\$80,803	\$79,680
5	\$24,960	\$61,440	\$77,280	\$90,320	\$78,160	\$82,000	\$88,960
6	\$20,000	\$48,960	\$54,000	\$68,960	\$55,920	\$39,600	\$58,080

PUMS data from the One-Year 2014 ACS can then be used to estimate the proportion of households that are LMI for each household size and region. Statewide, 40% (39.96%, to be more exact) of households are estimated to be LMI using this procedure (see Table 4.12 and Figure 4.8).

TABLE 4.12: PROPORTION OF HOUSEHOLDS BELOW 80% OF MEDIAN INCOME BY HOUSEHOLD SIZE BY REGION AND STATEWIDE, 2014 ACS

Region	State	Household Size						
		1	2	3	4	5	6	7+
1	40.9%	42.6%	39.9%	40.8%	40.4%	40.3%	36.5%	46.1%
2	40.5%	43.3%	39.9%	39.6%	38.1%	39.8%	43.0%	35.7%
3	39.4%	40.5%	40.5%	38.5%	37.6%	39.4%	41.7%	28.7%
4	39.6%	41.3%	39.2%	38.2%	39.1%	38.7%	39.6%	43.8%
5	38.9%	40.6%	39.4%	38.8%	37.0%	35.4%	39.7%	34.0%
6	39.1%	40.4%	38.1%	37.8%	39.4%	41.9%	40.7%	46.6%
State	39.96%	41.8%	39.7%	39.3%	38.7%	39.1%	39.7%	39.1%

FIGURE 4.8: PROPORTION OF STATEWIDE HOUSEHOLDS BELOW ACS 2014 LMI THRESHOLD



4.4.2 CALCULATING LMI HOUSEHOLDS

Next, the median income limits and resulting proportions of households estimated to be LMI (from Section 4.4.1) are matched with the population and household projections for 2015 and 2025 to produce an estimate of incremental growth in LMI households for each region between the beginning and end of the Prospective Need period. This step requires translating the projections of population in households and total households for 2015 and 2025 into an estimated distribution of household sizes.³⁴ The LMI proportions by household size and county can then be applied to this estimated distribution.

Projections for 2015 and 2025 begin with the projections of population in households and total households for each county, which have been established through prior steps in the procedure. The distribution of household sizes needs to be consistent with the population and household numbers (determined via the forecast headship rates). We determine the 2015 and 2025 distribution of household sizes by calculating the distribution that a) yields the correct number of households, and b) is most similar to the distribution of household sizes observed in the 2010 Census for each county.³⁵ This step is undertaken by using the “Solver” function in Microsoft Excel (though other software packages would return the same result).³⁶ Households by size estimates for each county are then aggregated to the regional level and the calculated LMI rate for each region and household size from 2014 (using ACS data, as described in Section 4.4.1) is applied to produce estimated numbers of LMI households in 2015 and 2025.

This household size based approach can reasonably apply the LMI proportions from the beginning of the Prospective Need forward to the end of the Prospective Need because proportions are calculated for the same groups as the definition of the median income (by household size and region). Changes in the median caused by an increase or decrease in incomes in New Jersey are thus “built-in” to the metric, because those changes will cause a corresponding increase or decrease in the median income level. As a result, absent a change in

³⁴ The “distribution” of household sizes throughout this section refers to the proportion of households in a county that are one person households, two person households, and so on up to households of seven persons or more. This distribution by definition sums to 100% of households.

³⁵ “Most similar” is here defined mathematically as the solution which minimizes the sum of the squared differences in percent change in the proportion of the total distribution within each household size relative to the 2010 distribution.

³⁶ It should be noted that given the established projections of households and population in households, variance in the distribution of those households by household size has little impact on the estimated number of LMI households in a region. This is the case because median income and the resultant LMI thresholds are set uniquely by household size and region, and as a result LMI rates are nearly 40% for each household size (as shown in Table 4.12). This means that that applying the LMI rates from the current distribution would produce nearly the same result in terms of estimated LMI households as under the re-estimated distribution. This step of re-estimating the distribution is undertaken primarily to maintain internal consistency with the headship rate and population in households estimates used, even though its impact on the overall number of LMI households is minor.

the distribution of incomes the proportion of households within a given household size and region will stay consistent.³⁷

This approach avoids problems inherent in the Prior Round methodology, which did not account for accompanying changes in the median income as the demographics of a region changed. The Prior Round method projects future income levels by “carrying forward the income characteristics of all households...by age cohorts” (26 N.J.R. 2347). In the context of the methodology, this means that the estimated proportion of households that are LMI by age cohort and county at the beginning of the Prospective Need period is carried forward to the end of the Prospective Need period, at which time to relative proportions of those age and county cohorts in the State’s population is projected to have changed. This is not a mathematically sound approach for projecting county, regional or statewide incomes *relative to the median*.

Said another way, it may be reasonable to project that New Jersey’s households will get poorer based on demographic changes. It does not follow from that circumstance, however, that New Jersey’s households would be getting poorer relative to the median – since by definition, the median income itself is a statistical result of the income conditions of New Jersey’s households. As the state’s households get richer or poorer, due to demographic, economic, or other factors, the median household income by definition tracks that change. A change in incomes relative to the median would only be caused by changes in the *distribution* of incomes around the median, which are unrelated to the income level captured by the Prior Round methodology. In a state with an aging population, applying the income shift caused by demographic changes without accounting for the accompanying effects on the median income is a clear mathematical flaw of the Prior Round methodology that will result in an overestimate of the LMI proportion of the population at the end of the Prospective Need period.

The same principle that has been described with respect to population aging and its impact on the median also applies to changes in the distribution of population and households within a region comprised of counties of varying wealth levels. For example, in a region where the population of a wealthy county (relative to the regional median) is projected to increase as a proportion of the regional population, the Prior Round methodology would conclude that the region would have fewer LMI households, since the relatively low LMI proportions from that county would be applied to a proportionally larger base of households. While it is true that aggregate wealth of a region would be increasing in this circumstance, this would not necessarily lead to changes in LMI rates relative to the median for that region, since the median incomes in the various household bands would rise to account for the wealthier population, an effect missed

³⁷ It is of course possible for the distribution of incomes to change, independent of the income level. However, the Prior Round methodology makes no attempt to project such change. Further, the LMI proportions derived from 80% of the median income using the ACS (shown in Table 4.12) illustrate that the proportion of households those in the “income band” between 80-100% (the relevant proportion to the calculation of LMI households) is currently near 10% for all household sizes, yielding the 39.96% statewide LMI proportion. Said another way the gap between the 50% of the population below the median income and the 40% of population below the LMI threshold does not suggest any unusual distribution of income. Therefore, no change in distribution is assumed in this procedure.

by the Prior Round methodology. To account for this, we aggregate households by household size at the regional level and apply the LMI proportion regionally, rather than applying proportions by county.

The results of this procedure are shown for each region and statewide for 2015 and 2025 in Table 4.13. The effective LMI rate (yielded by applying the LMI proportion by household size and region to the projected distribution of households by household size and region and aggregating the results) is 39.93% in 2015 and 39.96% in 2025.

TABLE 4.13: PROJECTED LMI HOUSEHOLDS BY REGION AND STATEWIDE, 2015 AND 2025

Region	Total Households 2015	Effective LMI Rate 2015	LMI Households 2015	Total Households 2025	Effective LMI Rate 2025	LMI Households 2025
1	824,560	40.9%	337,130	868,310	40.9%	355,020
2	703,400	40.4%	284,190	735,970	40.5%	297,770
3	451,520	39.3%	177,560	473,180	39.3%	186,070
4	587,300	39.6%	232,710	604,160	39.6%	239,430
5	468,450	38.9%	182,040	489,160	38.9%	190,470
6	222,780	39.1%	87,190	224,720	39.1%	87,950
State	3,258,010	39.93%	1,300,820	3,395,500	39.96%	1,356,690

The resulting estimate of incremental LMI household growth over the Prospective Need period is shown in Figure 4.9 and Table 4.14. Statewide, LMI households are projected to increase by approximately 56,000 from 1,301,000 in 2015 to 1,357,000 in 2025.

FIGURE 4.9: PROJECTED INCREMENTAL GROWTH IN STATEWIDE LMI HOUSEHOLDS, 2015 – 2025

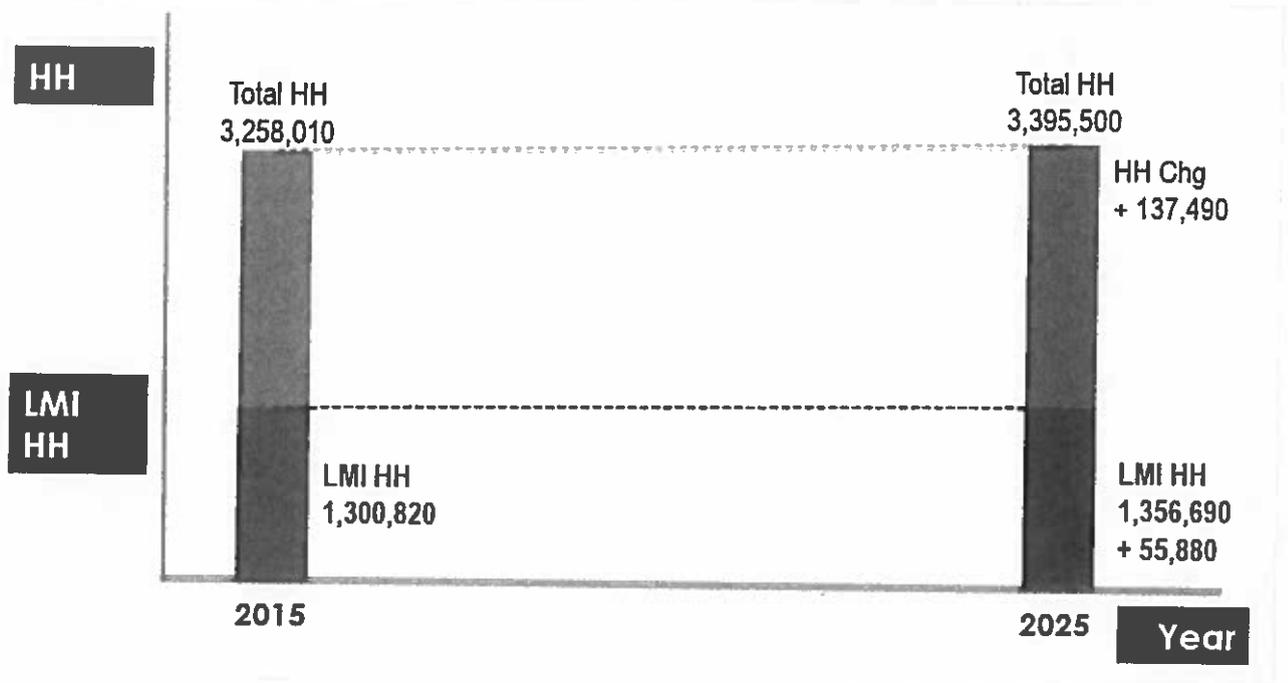


TABLE 4.14: PROJECTED CHANGES IN LMI HOUSEHOLDS 2015-2025 BY REGION AND STATEWIDE

Region	LMI Households 2015	LMI Households 2025	LMI HH Increase 2015-2025
1	337,130	355,020	17,880
2	284,190	297,770	13,580
3	177,560	186,070	8,510
4	232,710	239,430	6,720
5	182,040	190,470	8,430
6	87,190	87,950	760
State	1,300,820	1,356,690	55,880

4.5 SIGNIFICANT HOUSING ASSETS

The estimation of incremental LMI household growth over the Prospective Need period does not represent the completion of the calculation of Prospective Need by region.³⁸ One notable group that is captured in the LMI household projections but does not represent need for affordable housing is those households that are LMI with respect to their annual household income, but possess significant housing assets. The 2001 Uniform Housing Affordability Controls (UHAC) under the FHA set forth rules concerning eligibility for affordable housing units, which specifically cite "equity in real estate" as a form of income to determine eligibility in N.J.A.C. 5:80-26.16(b)1. Each iteration of the Round 3 methodology adopted by COAH since UHAC was instituted has therefore included a "test" to determine the proportion of incremental LMI households who are will not be eligible for affordable housing, and indeed are not in need of it, due to their real estate assets.

The UHAC standard with respect to housing assets reads as follows:

If the applicant household owns a primary residence with no mortgage on the property valued at or above the regional asset limit as published annually by COAH, a certificate of eligibility shall be denied by the administrative agent, unless the applicant's existing monthly housing costs (including principal, interest, taxes, homeowner and private mortgage insurance, and condominium and homeowner association fees as applicable) exceed 38 percent of the household's eligible monthly income.

[N.J.A.C. 5:80-26.16(b)3]

Accordingly, data from the One-Year 2014 ACS PUMS on the real estate assets held by LMI households is used to apply this "asset test" at the beginning and end of the Prospective Need period. This calculation determines the proportion of LMI households, by region and household size, that:

- a) Own a primary residence valued at or above the regional asset limit published by COAH with no mortgage; and
- b) Pay less than 38% of eligible monthly income on housing costs, as per the standard established in UHAC.

It should be noted that eligible income, as defined in UHAC, includes:

³⁸ As Special Regional Master Richard Reading notes in his October 30th *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*, "the intent of the calculation of prospective need...is to define the housing need for lower income households, not the total volume of LMI households." (page 26)

...income from assets such as savings, certificates of deposit, money market accounts, mutual funds, stocks, bonds and imputed income from non-income producing assets, such as equity in real estate...Assets not earning a verifiable income shall have an annual imputed interest income using a current average annual savings interest rate. Assets not earning income include present real estate equity.

[N.J.A.C. 5:80-26.16(b)1 and (b)3]

PUMS data contains incomplete information on the full investment portfolios of households with respect to mutual funds, stocks, etc. Investment income is therefore conservatively excluded from the analysis, which results in an underestimate of the proportion of households that spend less than 38% of their income on housing and are therefore excluded from affordable housing need based on the asset test. However, it is possible based on PUMS data to calculate imputed income from real estate equity as described in the UHAC regulation (using the yield on a money market account as a proxy interest rate). This calculation is undertaken and added to the calculation of eligible monthly income utilized in this procedure.

The significant asset test is applied by comparing the sum of eligible assets as reported in the 2014 One-Year PUMS to the 2014 regional asset limits published by COAH. The proportion of LMI households disqualified from eligibility for affordable housing by this standard is calculated for each region and household size combination. Statewide, this proportion sums to 8.8% for both 2015 and 2025. These proportions are then applied, by county and household size, to the projected population of LMI households for 2015 and 2025 (as estimated in Section 4.4). This yields an estimate of eligible LMI households at the beginning and end of the Prospective Need period.

The results of this calculation are shown in Figure 4.10 and Table 4.15. Approximately 114,000 households are disqualified by the significant asset test in 2015, and approximately 119,000 households are disqualified by the asset test in 2025. Eligible LMI households are estimated to increase by approximately 51,000 over the Prospective Need period.

FIGURE 4.10: PROJECTED INCREMENTAL GROWTH IN STATEWIDE ELIGIBLE LMI HOUSEHOLDS, 2015 – 2025

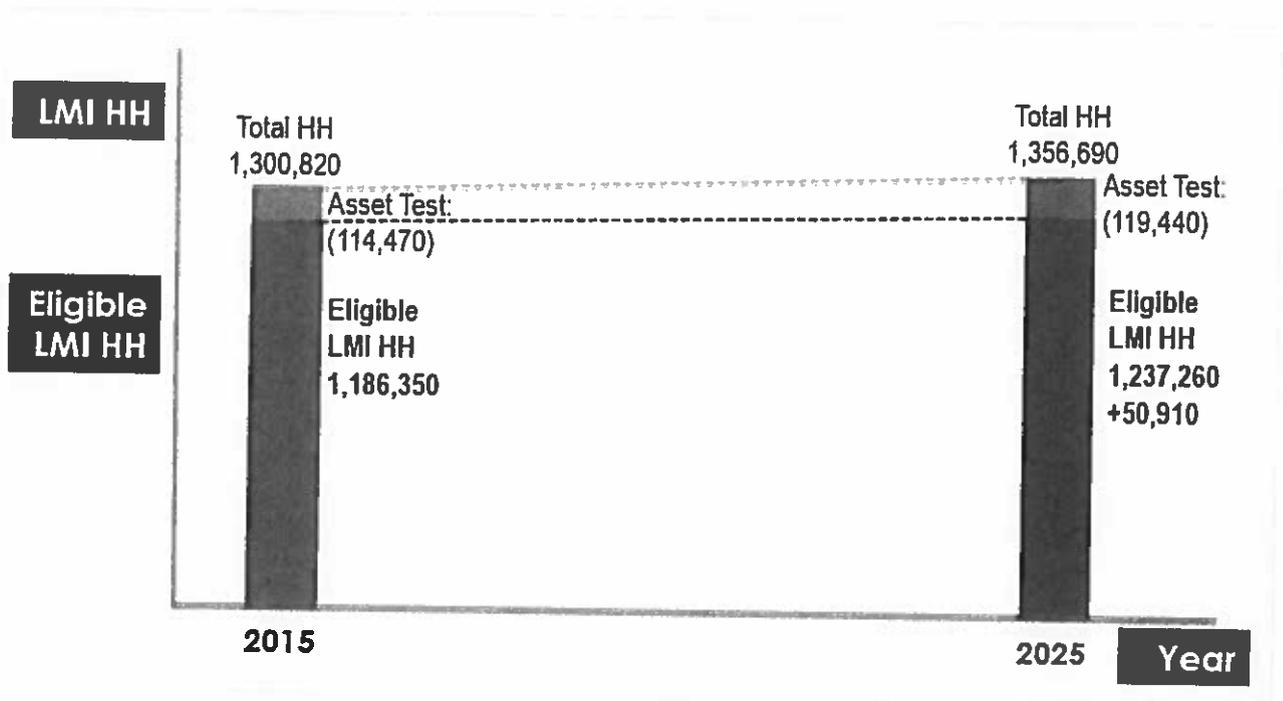


TABLE 4.15: HOUSEHOLDS WITH SIGNIFICANT REAL ESTATE ASSETS 2015-2025 BY REGION AND STATEWIDE

Region	LMI Households 2015	HH with Significant Assets 2015	Eligible LMI Households 2015	LMI Households 2025	HH with Significant Assets 2025	Eligible LMI Households 2025	Eligible LMI HH Increase 2015-2025
1	337,130	(23,060)	314,070	355,020	(24,300)	330,720	16,650
2	284,190	(18,520)	265,670	297,770	(19,470)	278,300	12,630
3	177,560	(20,270)	157,290	186,070	(21,240)	164,830	7,540
4	232,710	(26,030)	206,680	239,430	(26,820)	212,610	5,930
5	182,040	(17,300)	164,740	190,470	(18,220)	172,250	7,510
6	87,190	(9,280)	77,900	87,950	(9,400)	78,560	650
State	1,300,820	(114,470)	1,186,350	1,356,690	(119,440)	1,237,260	50,910

4.6 PROSPECTIVE NEED BY REGION RESULTS

The final step is to summarize the increase in eligible LMI households to yield the Prospective Need for the July 2015 – June 2025 period by region. Regional Prospective Need is calculated as the incremental difference between eligible LMI households at the start of the Prospective Need period in 2015 and the end of the Prospective Need period in 2025. Table 4.16 below shows Prospective Need by region and statewide. Statewide need totals approximately 51,000.

TABLE 4.16: PROSPECTIVE NEED BY REGION AND STATEWIDE, 2015-2025

Region	Eligible LMI Households 2015	Eligible LMI Households 2025	Regional Prospective Need
1	314,070	330,720	16,650
2	265,670	278,300	12,630
3	157,290	164,830	7,540
4	206,680	212,610	5,930
5	164,740	172,250	7,510
6	77,900	78,560	650
State	1,186,350	1,237,260	50,910

It should be noted that the Round 2 methodology added an additional step to the calculation of regional Prospective Need not undertaken in Round 1, which was a re-allocation of projected need for LMI households under the age of 65 between the regions. This step is the only cross-regional calculation in the entire methodology, and merits further discussion.

The rationale set for in the Round 2 methodology for the re-allocation of prospective need for households where the householder is under 65, but not those where the householder is over 65, is as follows:

Growth in the working-age component of low and moderate income households was assigned to regions where jobs previously grew. On the other hand, growth in the elderly and presumably non-working population was retained in the original region where this growth took place. This procedure creates a demand to house low and moderate income families of working age in locations where jobs grew and a similar demand to house the elderly where their growth occurred naturally.

[26 N.J.R. 2347]

Thus, the goal of the re-allocation of Prospective Need for householders under 65 is to match need with locations “where jobs grew.” To do so, employment is not measured directly, but

instead a proxy metric of the growth in non-residential property valuation (also called "ratables") from the prior period (in this case 1980 to 1990 is used).

This procedure is problematic on a number of levels.

- First, it seeks to determine where jobs grew in the past in order to allocate future affordable housing needs. In fact, the more relevant metric for determining future affordable housing need is the employment change over the Prospective Need period, which may not be correlated with changes by region over the prior period.
- Second, projected changes in future employment by location are already built into the population model. The Economic Demographic population projection model from the NJLWD explicitly uses employment forecasts as the driver of net migration, and therefore population growth, by county. While the Economic Demographic model is averaged with the Historic Migration model to determine the overall population base, as described in Section 4.2, the distribution of population by county for 2025 is drawn directly from the Economic Demographic model, and then re-based to the averaged population estimate. Thus, anticipated employment growth by region is already included in the projections of populations and households by region.
- Further, the regions themselves are defined in part by the live-work relationships within their borders, as described in Section 2.1. This process ensures that the majority of in-state commuters working in each region live in that region as well (approximately 68% statewide, based on 2013 data). Therefore, it is unclear why re-allocation between the regions is necessary.
- 65 is not necessarily the end of "working age," and seniors do not necessarily "age in place." The 1983 Social Security Amendments phased in an increase in the full retirement age to 67, citing "improvements in the health of older people and increases in average life expectancy."³⁹ Further, LMI retirees do not necessarily stay in their original locations. Many move to take advantage of lower costs of living or communities geared towards their needs. Some regions of the state may have a positive or negative "net migration" from this group.
- Finally, the metric used for this re-allocation is highly problematic. The use of non-residential valuation as a proxy for ratable growth is discussed in more detail in Section 5.2 of this analysis, which evaluates its suitability for use in the municipal allocation calculation, and substitutes more appropriate direct measures of employment within that allocation formula. As that section makes clear, the link between employment growth and non-residential valuation growth is weak. While it is understandable that this proxy was employed at the municipal level, where direct measures of employment were problematic at the time the Round 2 methodology was developed, it is surprising that direct

³⁹ As reported by the Social Security Administration, available online at: (<https://www.ssa.gov/planners/retire/ageincrease.html>).

employment counts were not used in this procedure at the regional level, where they are readily available from government sources. Further, it is surprising that this flawed proxy was used as a sole re-allocation factor for this procedure, when it represents just one of several metrics in the municipal allocation process.

For these reasons, we follow the Round 1 methodology and do not re-allocate Prospective Need between the regions for householders under 65.

5.0 MUNICIPAL ALLOCATION OF PROSPECTIVE NEED

After Prospective Need has been determined by Region (Section 4), it is translated into individual obligations for each municipality. This process begins with the municipal allocation formula described in this section, which allocates the full quantity of need identified in each region among the municipalities within that region. This process arrives at initial municipal Prospective Need obligations. Adjustments to those obligations, along with Present Need obligations, are then undertaken in subsequent sections.

The procedure used to complete municipal allocation proceeds in four steps:

1. First, qualifying urban aid municipalities are identified and excluded from the remainder of the calculation, as they have no prospective need obligations under the Prior Round methodologies (Section 5.1).
2. Next, measures of municipal “responsibility” for affordable housing need are defined and calculated for each municipality as a share of their region (Section 5.2).
3. Then, measures of municipal “capacity” for affordable housing need are defined and calculated for each municipality as a share of their region (Section 5.3).
4. Finally, the resulting regional shares on each measure are averaged for each municipality to produce a total obligation share as a proportion of regional need. Those shares are set against total regional Prospective Need, as determined in Section 4, to arrive at initial municipal allocations of Prospective Need (Section 5.4).

5.1 URBAN AID MUNICIPALITIES

Round 1 and Round 2 methodologies each establish a category of “selected” municipalities that are excluded from responsibility for Prospective Need (and, in the Prior Round methodologies, Re-Allocated Present Need). These municipalities are those that are designated “urban aid” by the State, and also meet one of three criteria (specified below) related to the level of existing LMI housing deficiency, population density, and available land within the municipality. A majority of the state-designated urban aid municipalities typically qualify under one or more of these standards (for example, 45 municipalities qualified in Round 2) and are therefore excluded from Prospective Need obligations.

The qualifying urban aid standards from the Round 2 methodology are applied, unadjusted, in this analysis. This approach applies the following three standards to each of the municipalities on the current (in this case, FY 2016) State urban aid list, and excludes municipalities meeting any of the standards:

1. A level of existing LMI housing deficiency exceeding average LMI housing deficiency for the region in which they are located (as determined by the Present Need calculation described in Section 3 and shown in Appendix A); OR
2. A population density of greater than 10,000 persons per square mile (as measured by a comparison of 2014 municipal population from the American Community Survey and municipal land area as reported by the New Jersey Department of Community Affairs); OR
3. A population density of 6,000 to 10,000 persons per square mile AND less than 5 percent of vacant, non-farm municipal land as measured by the average of the proportion of land valuation and the proportion of total parcels represented by vacant parcels (as reported by the New Jersey Department of Community Affairs for 2014).

There are 58 municipalities on the State's urban aid list for FY 2016.⁴⁰ Table B.1 in Appendix B below shows the results of the application of these standards to each of the 58 municipalities. In total, 41 municipalities are determined to be "qualifying" and are thus exempted from any Prospective Need allocation.

It is important to note that qualifying urban aid municipalities are not included in the municipal share calculations for each region, in accordance with the methodology utilized in Round 2:

Only those municipalities designated here-in to receive re-allocated present need and prospective need shall be included in the housing region totals...for the purpose of distributing need.

[26 N.J.R. 2318]

Mechanically, this means that the denominator for the regional share calculated for each municipality for each factor discussed below is the sum total of all non-urban aid municipalities only within the region. This ensures that the allocation percentages for each municipality within a given region add up to 100%.

Table 5.1 shows the 41 qualifying urban aid municipalities excluded from the municipal allocation of regional Prospective Need.

⁴⁰ Available from the New Jersey Department of Community Affairs website at: (<http://www.nj.gov/dca/divisions/dlgs/resources/stateaidinfo.shtml>)

TABLE 5.1: QUALIFYING URBAN AID MUNICIPALITIES⁴¹

Municipality	County	Region	Municipality	County	Region
Asbury Park City	Monmouth	4	Long Branch City	Monmouth	4
Atlantic City	Atlantic	6	Montclair Township	Essex	2
Bayonne City	Hudson	1	New Brunswick City	Middlesex	3
Belleville Township	Essex	2	Newark City	Essex	2
Bloomfield Township	Essex	2	North Bergen Township	Hudson	1
Bridgeton City	Cumberland	6	Orange City	Essex	2
Camden City	Camden	5	Passaic City	Passaic	1
Carteret Borough	Middlesex	3	Paterson City	Passaic	1
Clifton City	Passaic	1	Penns Grove Borough	Salem	6
East Orange City	Essex	2	Pennsauken Township	Camden	5
Elizabeth City	Union	2	Perth Amboy City	Middlesex	3
Garfield City	Bergen	1	Plainfield City	Union	2
Gloucester City	Camden	5	Pleasantville City	Atlantic	6
Hackensack City	Bergen	1	Rahway City	Union	2
Hillside Township	Union	2	Roselle Borough	Union	2
Hoboken City	Hudson	1	Trenton City	Mercer	4
Irvington Township	Essex	2	Union City	Hudson	1
Jersey City	Hudson	1	Vineland City	Cumberland	6
Lakewood Township	Ocean	4	Weehawken Township	Hudson	1
Lindenwold Borough	Camden	5	West New York Town	Hudson	1
Lodi Borough	Bergen	1			

We note that the term “urban aid” does not appear in the Fair Housing Act, and both the exclusion of urban municipalities and the standards by which they are excluded are regulatory standards developed as part of the Prior Round methodologies. The rationale for this exclusion is set forth in the Round 1 methodology:

⁴¹ All municipalities on the State urban aid list qualified as exempt from obligation except for the following: Brick Township (Ocean County), Glassboro Borough (Gloucester), Gloucester Township (Camden), Kearny Town (Hudson), Millville City (Cumberland), Monroe Township (Gloucester), Mount Holly Township (Burlington), Neptune City Borough (Monmouth), Neptune Township (Monmouth), Old Bridge Township (Middlesex), Pemberton Township (Burlington), Phillipsburg Town (Warren), Salem City (Salem), Willingboro Township (Burlington), Winslow Township (Camden), Woodbridge Township (Middlesex), Woodbury City (Gloucester). See Appendix B for detail on qualification standards by municipality.

Neither prospective need nor re-allocated present need are directed to Urban Aid municipalities which have the characteristics of older core areas to avoid reconcentration of low and moderate income families in these fiscally/economically stressed locations.

[18 N.J.R. 1136]

It is unclear if the standards chosen in the Prior Round methodologies in fact accomplish that goal. Specifically, they appear to reflect a dated conception (understandably, given that Round 1 and Round 2 were created in 1986 and 1994, respectively) of housing capacity and demand dynamics. As evidenced by recent population growth in urban areas throughout the state, density and a lack of vacant land are not necessarily impediments to housing unit growth. Indeed, housing demand is often higher in dense, amenity rich areas. For a nearby example, one need look no farther than downtown Manhattan, where vacant land is non-existent, population density is at a national peak, and yet housing demand and supply continue to rise. Said another way, the consideration of available vacant land implicitly assumes that New Jersey's residents, LMI and otherwise, are interested only in housing that is built "out" rather than built "up." This assumption does not appear to be supported by recent population and housing trends in the State.

However, the population and housing dynamics described above certainly do not apply to all urban aid municipalities within the state, and certainly cases of fiscal and economic stress remain. A more appropriate set of standards might seek to distinguish those factors by looking at fiscal and economic conditions within urban aid municipalities, and potentially metrics related to prior growth in population and/or housing units. We therefore concur with Regional Special Master Richard Reading, who writes in the October 30th *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*:

....new economic circumstances suggest that the list of exempted urban aid municipalities should be reviewed and perhaps revised as increasing proportions of the State's population and housing growth are now occurring within those exempted urban aid municipalities (page 28).

5.2 RESPONSIBILITY FACTORS

The municipal allocation formula for the distribution of regional prospective need in the Prior Rounds has relied on a mix of "responsibility" and "capacity" factors. The premise of the responsibility factors is defined as follows in the Round 1 methodology:

These factors...represent measures of *responsibility*, i.e. the labor force drawn to the municipality needing housing.

[18 N.J.R. 1136 (emphasis in original)]

The apparent intent of this step is to build into the municipal allocation formula consideration for the proportion of regional employment and/or employment growth attributable to each

municipality. The Round 1 methodology accomplishes this aim directly; the two responsibility factors in the municipal allocation formula are employment change shares, measured as the “regressed covered employment change” within each municipality from 1977-84 as a share of regional employment change, and employment shares, measured as the 1984 covered employment in each municipality as a share of the regional employment.

However, while the conceptual basis for utilizing employment and employment change shares is clear, the covered employment data utilized in Round 1 proved problematic. The Round 2 methodology therefore replaced this metric to avoid the “zip code problem associated with Covered Employment data,” which it describes as “situations where the zip code address of a firm does not reflect the actual location of its employment” (26 N.J.R. 2346). This direct measure of employment was therefore replaced with a surrogate measure in the form of equalized nonresidential property valuation (both the level, as of 1990, and the change from 1980 to 1990).

This measure is problematic as a surrogate for employment. Changes in non-residential property valuation for a municipality may in some cases reflect changes in employment within that municipality (for example, if a new office building were constructed on a vacant lot, increasing both employment and property valuation). However, there are many counter-examples where property valuation is disconnected from employment levels. For example, a property may change from a use with high employment intensity to a use with low employment intensity (or vice versa) without materially changing the property valuation. In fact, a non-residential property can switch between vacancy and occupancy, potentially with major employment impacts, without materially changing valuation.

In addition, valuation changes may have little connection with the activity at the site. In areas with strong real estate markets, valuation is likely to increase due to strong market conditions regardless of the employment patterns within the municipality, while weak real estate markets may produce decreases or moderate increase in valuation even when employment is growing. Additionally, many large employers hold property that is exempt from local property tax (such as educational institutions, hospitals, religious uses, governments, etc.). In these instances, there is no incentive for local governments to carefully and regularly assess these property values. Finally, the method implicitly assumes that properties are revalued regularly, consistently and uniformly in New Jersey. In practice, these valuations take place at different times in different locations across the state, meaning that data at any given point in time is not truly comparable. In sum, the use of property valuation as a proxy for employment change is deeply flawed.⁴²

Fortunately, as described in Section 2.1, data on employment by municipality with a consistent time series back to 2002 is now available through the Local Employment Dynamics (LED)

⁴² Indeed, as the Regional Special Master Richard Reading notes in his October 30th report *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*, “the new surrogate may actually be more problematic than the discarded employment data.” (page 28)

Partnership program of the U.S. Census Bureau.⁴³ Based on a combination of state and federal administrative data and data from census and surveys, the Census Bureau reports detailed statistics on employment at a variety of geographic levels, including municipalities. This data source, which was not available in the Round 2 methodology, allows for the use of direct employment data as originally envisioned in the Round 1 methodology, replacing the flawed proxy of non-residential valuation growth. The consistent time series associated with this metric allows for the calculation of both the change in employment over time in each municipality, and the level of employment in each municipality as of the most recent data release (2013), mirroring the treatment of non-residential valuation (which included both change and level) in Round 1.⁴⁴

5.2.1 EMPLOYMENT LEVEL

Employment data by municipality for 2013 is drawn from the LEHD Origin-Destination Employment Statistics (LODES) dataset publicly available from the U.S. Census. As in Section 2, “primary jobs” held by New Jersey residents are considered, since they represent the drivers of housing need. These municipal employment counts are then aggregated by region to produce a regional total. The employment share for each municipality is simply the proportion of aggregate regional employment within each municipality based on the 2013 primary jobs data.⁴⁵

5.2.2 CHANGE IN EMPLOYMENT

The same LODES dataset is also utilized to determine each municipality’s share of regional change in employment over the prior period. Since a continuous data set is available back to 2002, that year is set as the beginning of the prior period. Employment change for each municipality is calculated by subtracting the 2002 employment level from the 2013 employment level.

⁴³ As described in Section 2.1, the LEHD program includes collaboration between the federal Census Bureau and 49 states (Massachusetts chooses not to participate) under the Local Employment Dynamics (LED) Partnership. Under this program, states share Unemployment Insurance earnings data and Quarterly Census of Employment and Wages data with the Census Bureau, which combines these administrative data with its own administrative inputs and data from censuses and surveys. These inputs yield detailed statistics on employment, earnings and job flows at a variety of geographic levels. This data set, which was unavailable at the time of the Round 2 methodology, represents the most updated and appropriate data set for evaluating the live-work relationships between counties.

⁴⁴ The un-adopted 2014 Round 3 methodology for COAH relied only on the change in non-residential valuation, discarding the traditional “level” metric. The reason for this change is unclear, and this procedure returns to the Round 2 approach of evaluating regional shares of both change and levels. One advantage of this approach is that it results in an even weighting of responsibility factors (of which there are two) with capacity factors (of which there are two) when an overall municipal allocation share is calculated (see Section 5.4).

⁴⁵ Appendix B contains shares by municipality for this factor, as well as the three other municipal factors described below.

One challenge in calculating employment change is that net employment for some municipalities is negative across the prior period. Since the municipal allocation formula ultimately averages shares of the region across the four allocation factors, a negative result in one of the four will result in a negative overall allocation for a municipality, which is statistically problematic. To address this issue, employment change is aggregated regionally only for those municipalities that have observed employment growth, and shares of regional growth are calculated for those municipalities only (ensuring that the regional share sums to 100%). Municipalities with negative job growth are assigned a 0% share for this metric.⁴⁶

5.3 CAPACITY FACTORS

The premise of capacity factors is defined as follows in the Round 1 methodology:

...represent measures of *capacity*, i.e. the physical and fiscal capacity to absorb and provide for such housing.

[18 N.J.R. 1136 (emphasis in original)]

In both the Round 1 and Round 2 methodologies, as well as the un-adopted 2014 Round 3, the “fiscal capacity” was evaluated based on municipal income levels, while the “physical capacity” was based on an analysis of land that can accommodate development. These measures are retained in this procedure and calculated as described below.

5.3.1 AGGREGATE INCOME DIFFERENCE

Municipal income share was evaluated in Round 2 through a complicated procedure that utilized two different metrics with respect to “income differences” between a municipality and a “regional income floor.” This procedure replaced a more straightforward calculation of the municipal share of aggregate regional income that was utilized in Round 1. The rationale for this change is described as follows:

This procedure replaces the unaltered share of aggregate income (from Round 1) that tended to give large middle-class municipalities an overabundance of low- and moderate-income housing need because they had a lot of households with reasonably healthy incomes. This new procedure employs not income but income differences...It is believed that this procedure achieves both equity and more incisive income targeting.

[26 N.J.R. 2346-2347]

⁴⁶ It is worth re-iterating that qualifying urban aid municipalities are excluded from both the numerator and the denominator of all regional share calculations. In the case of employment growth, the combination of the exclusion of these municipalities and the zero share assigned to those municipalities with negative job growth may result in relatively high shares for those municipalities with positive job growth in low-growth regions.

The Round 2 methodology determines a regional income difference share for each municipality based on the average of the following two measures:

- a. Municipal share of the regional sum of the differences between median 1993 municipal household income and an income floor (\$100 below the lowest average household income in the region), and
- b. Municipal share of the regional sum of the differences between median 1993 municipal household incomes and an income floor (\$100 below the lowest 1993 median household income in the region) weighted by the number of households in the municipality.

[26 N.J.R. 2346]

Conceptually, averaging an unweighted measure of income differences with a measure of income differences weighted by population may be reasonable. However, as executed in Round 2, each component has a major mathematical flaw requiring adjustment:

- The first income difference calculation in Round 2 compares the *median* income for a given municipality to a regional income floor based on *average* income. While the procedure is intended to produce a positive result⁴⁷ for all participating municipalities,⁴⁸ it is possible for a comparison of a median income with a regional floor based on average income to produce a negative result, which would be problematic for translating the income share average to the regional allocation formula. This negativity can occur because a municipal median can, as a statistical matter, be lower than the lowest average income for any municipality in the region. This negative effect does in fact appear in the 2009-2013 data prior to the removal of qualifying urban aid municipalities from the calculation. In addition, it is questionable whether the comparison of a median to an average is statistically valid for the purposes of determining income differences.
 - To correct this deficiency, the *median* income for each municipality is compared to a regional floor set \$100 below the lowest *median* income in the region in this procedure, using median income by municipality from the 2009-2013 Five-Year ACS.
- The second income difference calculation in Round 2 compares the median income for a given municipality to a regional income floor based on median income, and then weights those difference by the number of households in each region to determine the regional income pool from which income share is calculated. However, this weighting procedure

⁴⁷ Endnote 19 in the Round 2 methodology explains that the placement of an income floor \$100 below the lowest municipal income in the region is done "to ensure that all pool numbers on this variable are positive" (26 N.J.R. 2353).

⁴⁸ In addition to excluded qualifying urban aid municipalities, three municipalities (Walpack Township in Sussex County and Pine Valley Borough and Tavistock Borough in Camden County) have insufficient population for a median or average income to be generated in the ACS data. These municipalities are removed from the calculation and assigned an income share of 0 to avoid adverse effects the regional floor and regional differences calculations.

does not constitute a statistically valid use of a difference in medians.⁴⁹ By contrast, weighing the difference in average (i.e. mean) income by the number of households produces a statistically valid estimate of aggregate income differences attributable to the total household population of each municipality.⁵⁰

- To correct this deficiency, the *average* (i.e. mean) income for each municipality is compared to a regional floor set \$100 below the lowest *average* (mean) income in the region in this procedure, with the difference is weighted by the number of households in each municipality. Average income and the number of household by municipality are drawn from the 2009-2013 Five-Year ACS.

5.3.2 DEVELOPABLE LAND

The second responsibility factor utilized has traditionally been the proportion of regional undeveloped land in each municipality “that can accommodate development” (26 N.J.R. 2346). This calculation involves a number of steps to account not only for the acreage of undeveloped land, but for various environmental and planning constraints on that available acreage. This procedure is undertaken in order to be “sensitive to the State Planning Commission’s goals for each Planning Area” (26 N.J.R. 2346), and to account for applicable environmental designations in arriving at an estimate through a uniform statewide methodology of the proportion of regional undeveloped land that “can accommodate development” in each municipality.

The first step in this process is to utilize tax assessment data by parcel to determine the potentially developable acreage by parcel in each municipality. This data is available on a uniform basis through the state’s MOD-IV property tax system.⁵¹ Parcel classifications within MOD-IV are utilized to determine which parcels may be developable, and the acreage of those parcels. Non-developable parcels are excluded from further analysis at this stage.⁵² The potentially

⁴⁹ This is the case because the median is, in statistical terms, a non-parametric measure, meaning that it does not imply a normal distribution around it. As a result, the median cannot be accurately applied to the full household population of a municipality, since (unlike the mean) the median by itself provides no information as to the level or distribution of income in those households.

⁵⁰ This is the case because the mean is in itself derived from the aggregate household wealth of the municipality (mean household income = aggregate household income / households).

⁵¹ The MOD-IV data and the parcel shapefiles were downloaded from the New Jersey Geographic Information Network (NJGIN). It is available online at: (https://njgin.state.nj.us/NJ_NJGINExplorer/IW.jsp?DLayer=Parcels%20by%20County/Muni).

⁵² Properties were coded as potentially developable if:

- a) their property classification is 1 (Vacant Land), 3A (Non-Qualified Farm), or 3B (Farm Qualified); OR
- b) their property classification is 2 (Residential -four families or less), 4A (Commercial), 4B (Industrial), or 4C (Apartment) AND the “improvement value” for the parcel is 0.

Properties that are subject to an abatement and/or PILOT are in the MOD IV data twice – once for the parcel itself and a second time for the exempt structure. The parcel is usually coded as having an improvement value of “0” when in fact it does have an improvement on it and is not therefore vacant. The entry for the building can be identified as having “BLDG” or “X” in the qualifier code. These parcels were dropped from the analysis.

developable parcels as determined by the MOD-IV data were then joined to a parcel shapefile for each county.

Next, these parcels are overlaid with official State geographic information system (GIS) layers to account for various environmental restrictions, and to classify parcel according to state planning designation. In instances where the environmentally sensitive lands overlapped with the potentially developable parcels, the land area that was considered to be environmentally sensitive was removed from the developable parcels.⁵³ The next step determined which planning area each parcel is located in.⁵⁴ This procedure yields an estimate of qualified developable acreage for each municipality classified by state planning designation (including environmental designations in the Pinelands, Meadowlands and Highlands areas).⁵⁵

The final step is to apply a weighting to undeveloped acreage in each planning area to account for the degree to which that area can accommodate development. We replicate the Round 2 methodology in assigning weights of 0 for acreage in planning designations not conducive to development, 0.5 for acreage in planning designations that are somewhat conducive to development and 1 for acreage in planning designations that are conducive to development. Importantly, the Highlands Water Protection and Planning Act passed in 2004 (N.J.S.A 13:20-1 et Seq.) defines a new "Highlands Region," divided into the "Highlands Preservation Area" and "Highlands Planning Area," which did not exist at the time the Round 2 methodology was developed and must be accounted for properly. We assign a weight of 0 to the Highlands Preservation Area, which is afforded a strong preservation policy by the Act, and assign weights in the Highlands Planning Area based on how similar areas are weighted in the Round 2 methodology.⁵⁶

Developable acreage in each planning designation is then multiplied by the weight assigned to that planning designation, and are summed to yield a total estimate of weighted developable acreage for each municipality. Results for each municipality are summed into regional totals, and

⁵³ The land that was considered environmentally constrained includes 300 foot C1 stream buffers, 50 foot C2 stream buffers, wetlands, surface water, land preserved by State and County Government, state and local parks, preserved Farms and preserved land managed by non-profits and local governments. This is the same suite of environmentally sensitive lands uses that are used by NJDEP as part of their wastewater estimator model.

⁵⁴ Official State Plan geographic layers are available on the website of the New Jersey State Department of Planning. These layers are reflective of the most recent approved state plan, adopted and released on March 1, 2001 by the New Jersey Department of State, Office of Planning Advocacy.

⁵⁵ As of December 2015, 59 of the 88 municipalities in the Highlands area are considered to be "participating" in the Highlands Plan Conformance Process, based on their submission of a Petition for Plan Conformance to the Highlands Council. The latest Plan Conformance Petition Status was provided by the Highlands Council. It is available online at: (http://www.highlands.state.nj.us/njhighlands/news/brochures/fact_sheet_11x17.pdf). Reliance upon this list as the most up to date data source for this analysis does not preclude a municipality from providing local information demonstrating that it is participating in the process in their efforts to secure approvals of their affordable housing plans.

⁵⁶ This method is similar to the weighting approach used in Dr. David Kinsey's 2015 methodology for the Fair Share Housing Center

shares of the regional total are computed for each municipality in each region. This proportion represents the developable land factor for each municipality in the municipal allocation formula.

We note that even though we follow the Round 2 method in including this factor, we find the notion of vacant, undeveloped land as the measure of capacity not fully convincing. Repurposing existing non-residential buildings, or demolishing underutilized structures and building more densely is a common approach to housing development, and that possibility is ignored in the Round 2 methodology. The implicit result of this approach is to bias development towards suburban green field locations.

5.4 MUNICIPAL SHARE OF REGIONAL PROSPECTIVE NEED

Finally, the regional shares by municipality of the two responsibility factors and two capacity factors described above are averaged together to yield a share of regional prospective need for each municipality.⁵⁷ Municipal shares within each region sum to 100%. These shares are then set against the regional Prospective Need as determined in Section 4 to yield the initial Prospective Need allocation for each municipality.⁵⁸

Table 5.2 illustrates the mechanics of this calculation for a hypothetical municipality in Region 1. Full results by municipality are shown in Appendix B.

TABLE 5.2: SAMPLE MUNICIPAL ALLOCATION CALCULATION

Name	Region	Regional Prospective Need	Employment Level Share	Employment Change Share	Income Differences Share	Developable Land Share	Averaged Share	Allocated Prospective Need
abc	1	12,540	1.50%	1.75%	2.25%	2.50%	2.00%	251

⁵⁷ As described in Section 5.1, this share is zero for qualifying urban aid municipalities, which are not included in the regional share calculation.

⁵⁸ The sum of municipalities will vary incrementally from the regional Prospective Need due to rounding (since a municipality cannot be assigned a fractional portion of a unit).

6.0 SECONDARY SOURCES OF AFFORDABLE HOUSING SUPPLY

The adjustment for secondary sources of affordable housing supply within the fair share calculation reflects the fact that the stock of affordable housing does not stay static absent the planning and zoning efforts of municipalities. As a result, the LMI housing need identified in the Present Need and Prospective Need calculations will in part be answered by market driven changes in supply. The projected magnitude of these changes on affordable housing supply is therefore estimated over a ten-year period, and adjustments to affordable housing need are made accordingly.

Three sources of market-based supply changes (referred to collectively as the “secondary sources”) are estimated.⁵⁹

1. **Demolitions:** Existing housing structures are at times demolished. To the extent that those units were previously occupied by LMI households and were not deficient (in which case they would already be captured within the Present Need calculation), these demolitions subtract from affordable housing supply, and therefore add to affordable housing need.
2. **Residential Conversions:** Existing residential structures can also be converted to yield a greater or lesser number of housing units. A portion of these changes impact the supply of affordable housing units. This impact may be positive or negative for a given geography, although it is typically positive, implying that conversions on net create additional supply, and therefore subtract from affordable housing need.
3. **Filtering:** Finally, existing housing stock changes value over time through depreciation or appreciation and real estate market forces. These changes can make existing units newly available or unavailable to LMI households, thus altering affordable housing supply. This estimate is the net difference between units filtering “down to” and “up from” the affordable housing category, and may be positive or negative for a given geography. A positive filtering estimate implies an addition to affordable housing supply (i.e. more units down than up) and subtracts from affordable housing need.

Estimates in each category are summed for each municipality to yield a calculation of net impact from secondary sources. This net figure may increase or decrease need for a given municipality. As in the Round 2 methodology, this adjustment is set against the initially calculated and allocated Present Need and Prospective Need. Further, an additional procedure is added to ensure that supply changes from secondary sources for municipalities with no need are allocated

⁵⁹ Note that the Round 2 methodology includes a fourth source of market-based affordable housing supply, “spontaneous rehabilitation,” which estimates investments by private property owners to upgrade existing deficient units. The methodology and justification for estimating this category is questionable in its accuracy, and it was not included in the un-adopted 2014 Round 3 methodology. It has been omitted from this analysis.

within the housing region, aligning the net effect of secondary source adjustments with the net difference between housing need and supply changes as intended.

6.1 DEMOLITIONS

An estimate of demolitions of LMI housing units has been included as a secondary source of affordable housing supply in each iteration of the fair share methodology. The Round 2 methodology draws on data from the NJ Department of Community Affairs (DCA) for the prior period to develop an annualized estimate of demolition activity by municipality. This estimate is utilized to project future demolition levels. An estimate is then developed of the proportion of these demolitions impacting LMI housing supply.

This procedure updates this approach by using additional data to refine the estimate of the proportion of demolitions impacting LMI housing supply. Further, it makes an adjustment to exclude demolitions of deficient units occupied by an LMI household. Since those units are already identified and included in the Present Need calculation, including them in the secondary source adjustments as increasing need is a clear instance of double-counting.⁶⁰

First, historic data on demolitions by municipality, as reported by DCA, are analyzed for the 2000 to 2014 time period. An average is calculated excluding the years 2012 and 2013, which saw unusual demolition activity due to Super Storm Sandy and thus are not predictive of future demolition levels. This annualized trend is then projected out over a ten year period to estimate future demolition levels.

Next, the LMI proportion of these demolitions is estimated. The American Housing Survey, which was used as a data source in secondary source calculations in the Round 2 methodology, provides a breakout of national demolitions by two factors relevant to this calculation: the occupancy status of the unit, and in the case of occupied demolitions, the income level of the occupant. For a demolition to count as reducing the amount of affordable housing, the unit must be 1) occupied, and 2) occupied by a LMI household.⁶¹ Our analysis therefore uses the national proportion of demolitions of occupied (rather than vacant or seasonal) units, drawn from an average of five iterations of the Components of Inventory Change (CINCH) report issued from 2003-2011.⁶² The same data set is used to estimate the proportion of occupied demolished units

⁶⁰ In effect the same deficient unit is counted twice, once when it is identified as LMI deficient and once when it is estimated to be demolished. In reality that demolition does not create additional need, since that same unit has already been identified as in need of replacement or rehabilitation in the Present Need calculation.

⁶¹ As noted by the Special Regional Master Richard Reading in the October 30th *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*, the connection between demolitions and affordable housing need "assumes the displacement of a household, rather than a "vacant" unit." (page 29) The report also notes that "demolitions may involve seasonal housing units that are neither subject to full-time housing before or after the demolition." (page 29)

⁶² This report is issued by the federal Department of Housing and Urban Development (HUD) based on American Housing Survey data. The reports are available online at: (<https://www.huduser.gov/portal/datasets/cinch.html>)

that were occupied by an LMI household.⁶³ According the averaged CINCH data, 53% of demolished units are occupied, and 79% of those units are low income, yielding an estimate that 42% of demolitions are LMI occupied units. This proportion is applied to the total demolitions projection.

Further, the CINCH surveys identify the proportion of housing with severe and moderate problems. This is used as a proxy for the proportion of demolished units that have markers of deficiency, and thus have already been captured in the Present Need estimate. The averaged proportion across the surveys (9%) is multiplied by the estimate of LMI occupied demolitions, and the resulting total is netted out of the estimate to yield an estimate of occupied, non-deficient LMI demolitions.

Table 6.1 shows the result of this demolitions estimate by region and statewide (see Appendix C for estimates by municipality). Statewide, LMI demolitions are anticipated to subtract approximately 19,000 sound affordable units, increasing affordable housing need.

TABLE 6.1: LMI OCCUPIED NON-DEFICIENT DEMOLITIONS BY REGION AND STATEWIDE

Region	Annualized Demolitions, 2000-2011 & 2014	Projected Residential Demolitions (10 year)	LMI Occupied (41.6%)	LMI Occupied and Deficient (8.9%)	LMI Occupied non-Deficient Demolitions
1	1,000	9,995	4,161	(372)	3,788
2	996	9,963	4,147	(371)	3,771
3	314	3,138	1,306	(117)	1,189
4	1,099	10,992	4,576	(409)	4,168
5	511	5,108	2,127	(190)	1,937
6	1,003	10,032	4,176	(374)	3,800
State	4,923	49,230	20,493	(1,834)	18,653

⁶³ This proportion is estimated by aggregating the bottom three income bands provided in the survey results, which collectively capture all households below \$50,000 in income.

6.2 RESIDENTIAL CONVERSIONS

An estimate of residential conversions, which captures the net effect of residential structures splitting into more units or consolidating into fewer units, has been included as a secondary source of affordable housing supply in each iteration of the fair share methodology. Since direct data on this activity is unavailable, the methodology employed in Round 1 and Round 2 estimates residential conversions by taking the net change in regional housing stock over a prior period, accounting for construction and demolition activity, and estimating conversions to be responsible for the remaining unexplained change.⁶⁴ This activity is then allocated to municipalities based on a proxy measure of multi-family housing, and an estimate of the proportion of these conversions impacting the LMI housing supply is applied.

This procedure follows the structure from Round 2, updating data sources as necessary. Change in residential housing stock is measured from 2000 to 2010 (using decennial Census data) at the county level, and then aggregated to the housing regions.⁶⁵ Housing unit certificates of occupancy for this period, as reported by the New Jersey Department of Community Affairs (DCA) at the municipal level, are used rather than residential building permits⁶⁶ to deduct the portion of the observed increase in housing units attributable to construction activity. Demolitions are also drawn from DCA data at the municipal level. Both construction and demolition activity are summed to the regional level, and the net difference is then compared to net difference in housing units. As in the Round 2 approach, the remaining difference in housing supply unexplained by construction or demolitions is assumed to be the result of housing conversions. The resulting estimate from this period is annualized and applied to the ten year prospective need period.

Next, the net regional conversions estimate is shared to municipalities within each region. The Round 2 methodology asserts that “residential conversion is highly correlated with the presence of two- to four-family housing units” (26 N.J.R. 2320) and therefore allocates conversions to municipalities based on their proportion of regional two- to four-family housing units. This procedure repeats that methodology utilizing 2009-2013 ACS data on municipal housing stock.

⁶⁴ Expressed mathematically, in Round 2: Residential Conversions = (Change in Housing Units) – (Building Permits) + (Demolitions)

⁶⁵ Census estimates are as of April 1 of the year they represent (in this case 2000 and 2010). Construction and demolition data are therefore adjusted to 75% for 2000 (to estimate the period from April – December) and 25% for 2010 (to estimate the period from January to March). The April 2010 end-date means that the housing stock is prior to Super Storm Sandy. Data recency is also de-prioritized relative to data consistency for this calculation because the relevant result for this calculation does not depend on projecting forward the current level of any metric. Instead, the residual approach is used to develop the best estimate of conversion activity over a prior period in order to apply an annualized estimate forward to the Prospective Need period.

⁶⁶ Certified units serve as a more reliable metric for completed residential construction activity than building permits, since the volume of building permits issued for construction commencement diverge from the volume of completed units in a given year for any of a number of reasons (projects completed in a subsequent year, projects never completed, etc.)

Finally, an estimate must be developed as to the proportion of these conversions that are affordable to LMI households. The Round 2 methodology asserts that “on a percentage basis, a greater share of residential conversion units flows to the low-and moderate-income population than to the population as a whole.” (26 N.J.R. 2349) However, it does not specify how this proportion is estimated within the calculation. For this procedure, 120% of the proportion of households qualifying as LMI within each county⁶⁷ is applied to the estimate of residential conversions for each municipality to yield an estimate of LMI residential conversions.

Table 6.2 shows the result of this net LMI residential conversions estimate by region and statewide (see Appendix C for estimates by municipality). Statewide, residential conversions are projected to add approximately 20,000 affordable units from 2015 to 2025, reducing affordable housing need.

TABLE 6.2: LMI RESIDENTIAL CONVERSIONS BY REGION AND STATEWIDE

Region	Est. Residential Conversions (Apr 2000 – Apr 2010)	Effective LMI Rate	Projected LMI Residential Conversions, 2015-2025
1	22,203	52.4%	11,629
2	5,225	54.2%	2,833
3	5,071	48.3%	2,451
4	4,273	47.4%	2,025
5	222	44.6%	99
6	2,499	44.6%	1,115
State	39,491	51.0%	20,152

6.3 FILTERING

Filtering of affordable housing stock occurs when housing becomes newly accessible (“filtering down”) or inaccessible (“filtering up”) to LMI households. While the fair share obligation process envisions zoning for and building affordable housing, **most of the housing affordable to LMI households in New Jersey was originally market rate housing that has become part of the affordable housing supply over time through downward filtering, and not housing specifically built for the affordable market.**

⁶⁷ This assumption mirrors a similar calculation that is enumerated in the Round 2 methodology with respect to demolitions. Like demolitions, residential conversions are likely to disproportionately impact LMI households, since such conversions generally create multiple smaller (and therefore less expensive) units out of larger units.

Downward filtering occurs because housing ages, the design and style of the house falls out of fashion, and because neighborhoods fall out of favor. As housing units age, deteriorate, and become outdated, they move down the “quality ladder.” Higher income households, attempting to maintain their desired housing quality, often move into high-quality new construction rather than rehabilitate their current unit, which can require significant investment to achieve the same quality as new construction.^{68,69} The departure of these households frees up existing units up for medium, moderate, and then low income households.⁷⁰

Upward filtering occurs because a location has become more valuable, and is sometimes referred to as “gentrification.” Across the overall housing market, downward filtering is more common than upward filtering.⁷¹

Filtering occurs when new market rate housing is being constructed faster than the number of households is increasing. The newly constructed housing in excess of household growth frees up existing units for occupancy by other households. In basic economic terms, the supply of housing has increased, and so prices will decrease on existing houses, and some existing units will become affordable. Indeed, every new market rate unit in excess of household growth means an existing unit ultimately becomes affordable, as once all the non-LMI households have housing, the owners of other housing units will have to lower their prices until an LMI household can afford it, or the unit will go vacant. Historically, in the 1999-2014 period, we observed significantly more new housing stock than household growth, as illustrated in Table 6.3

⁶⁸ O'Sullivan, A. (2009). *Urban economics* (7th ed.). Boston: McGraw-Hill Irwin.

⁶⁹ Kim, Chung & Blanco (2012). *The Suburbanization of Decline: Filtering, Neighborhoods and Housing Market Dynamics*. Original Source: Mitis, E., & Hamilton, B. (1989). *Urban economics*. Glenview, IL: Scott, Foresman.

⁷⁰ It is worth noting that there are exceptions to this simple model of filtering. For example, high income households might be incentivized to restore and maintain very amenity-rich, high-end units, as these units are less likely to effectively filter to lower income populations until housing supply increases sufficiently to absorb this increase in value. Source: O'Sullivan, A. (2009). *Urban economics* (7th ed.).

⁷¹ See, e.g. Stuart S. Rosenthal, *Old homes, externalities, and poor neighborhoods A model of urban decline and renewal*, *Journal of Urban Economics* 63 (2008), p. 823. According to Bier in *Moving Up, Filtering Down: Metropolitan Housing Dynamics and Public Policy* (2001), annual housing construction typically exceeds household growth. As discussed later in this section, downward filtering will occur when new housing construction outstrips household growth (page 7).

TABLE 6.3: 1999-2014 NEW JERSEY HOUSING MARKET FACTS

Category	Value
New housing stock (COs)	317,691
New households	201,122
Surplus of new housing construction	116,569
New housing stock (COs)	317,691
Demolitions	(78,568)
Increase in housing stock	239,123
Increase in housing stock	239,123
New households	201,122
Conversions to non-residential or vacant units	38,001

Court Guidance on Filtering

Filtering estimates in the Round 1 and Round 2 methodology were based on longitudinal data from the American Housing Survey. Specific units were tracked across a given time period, and the net difference between housing units filtering down and filtering up from the affordable housing categories were measured, annualized, and used to estimate future filtering effects. A similar methodology was included in the 2004 Round 3 methodology, and was rejected by the Appellate Court in 2007. With respect to filtering, that decision (*In re Adoption of N.J.A.C. 5:94 & 5:95*) held:

We conclude that the COAH premise, that housing is filtering down to low and moderate income households, lacks support in the record.

[In re Adoption of N.J.A.C. 5:94 and 5:95, 390 N.J. Super. 1]

Importantly, that decision with respect to filtering was limited to the methodology employed by COAH for the 2004 estimates:

We do not invalidate the use of filtering as a secondary source...if the data and methodology have a rational basis, then COAH remains free to incorporate filtering and other secondary sources in to the overall calculation of statewide housing need.

[Ibid]

The Court further pointed to five conditions, put forth by Anthony Downs, a housing economist at The Brookings Institution, which it suggested must be satisfied for filtering to occur:

“(1) an overall housing surplus; (2) a surplus of new housing construction over new household formation; (3) no major non-price barriers, such as discrimination, that limit mobility among low-income households; (4) moderate operating costs for newly built units; and (5) a limited number of poor households.”

[Id. at 5801-03]

We do not necessarily agree with these factors as they relate to the calculation of filtering within this context, but we nevertheless analyze whether the conditions have been satisfied:

- 1) There are currently approximately 250,000 non-seasonal vacant units in New Jersey, according to the ACS, which means that there is a surplus.
- 2) From 1999-2014, there was a surplus of new housing construction over new household formation, of more than 110,000 units, as illustrated in Table 6.3. Historically, new units exceeded population growth, and there is no reason to expect that they will not continue to do so over the 2015-2025 period
- 3) There is no measure to indicate that there are major non-price barriers that limit low-income household mobility.
- 4) New units are expected to have moderate operating costs because they require relatively little maintenance, and are constructed with modern, efficient appliances and HVAC systems. There is no evidence that newly built units have anything other than moderate operating costs.
- 5) As indicated in Section 4.4, the number of LMI households is expected to grow approximately in proportion to the population.

Thus, we conclude that these five criteria will likely be satisfied.

Filtering Model

Subsequent to the 2007 Appellate Court decision, COAH engaged Econsult Corporation to create a new filtering methodology based on housing transaction data and a more sophisticated

econometric approach for the 2008 Round 3 rules.⁷² The Appellate Court rejected the overall “Growth Share” approach in 2010, but did not specifically address the filtering component.⁷³

The current filtering calculation is an econometric approach based on housing transaction data, and focusing specifically on filtering with respect to affordability for an LMI household.

We follow a three-step process to estimate filtering:

1. We use a data set of all housing transactions in New Jersey from 2000-2014 which measures which units became affordable or unaffordable to LMI households.
2. We then create a model, based on historic filtering measured in step 1, to determine the probability of filtering based on geographical characteristics.
3. We apply the model from step 2 to the municipalities to estimate filtering for 2015-2025 on a municipal level.

Each step is described in detail below.

1 – Identify units that filtered historically

A unit filters up or down if the value of the house rises above LMI affordability or falls below LMI affordability, respectively. Our data include all owner-occupied housing transactions in New Jersey between 2000 and 2014. From these transactions, we identify houses that sell more than once, and use the prices of the two sales, compared to income limits, as the basis for our analysis of filtering. Directly comparing sales of the same unit over time, as opposed to comparing overall transactions by geographic conditions, controls for variation in building stock, and quality, and allows us to identify specifically when units cross between affordable and not affordable to LMI households.

For each region, for each year, we calculate the annual amount an LMI household can afford to pay for housing, based on regional income limits. For owner occupied units, this calculation requires annualizing the sales price of a unit into an ‘annual cost of ownership’. We calculate a cap rate, based on mortgage rates and tax rates, to annualize the sales price of housing units. We use the return from the 10 year T-bill plus 100 basis points to estimate a mortgage rate. We combine this with effective property tax rates for each municipality. This rate is used to calculate the annual cost associated with the sales price of units in our data. If this annual cost is less than 28% of LMI income for the region, the unit is considered affordable.

⁷² New Jersey Council on Affordable Housing: Task 2 – Estimating the Degree to which Filtering is a Secondary Source of Affordable Housing, Econsult Corporation, 2007

⁷³ Both COAH’s un-adopted 2014 Round 3 methodology and Dr. Kinsey’s 2015 methodology for the Fair Share Housing Center utilized annualized results from Econsult Corporation’s 2007 analysis.

In a paired transaction, a unit that was affordable in the first transaction and was not affordable in the second transaction filtered up. Conversely, a unit that was not affordable in the first transaction and was affordable in the second transaction filtered down. Note that filtering among paired sales does not represent all filtering because not all houses have sold twice during the sample period, and rental units are not included. The filtering directly observed in paired sales forms the basis for constructing a statistical model for the determination of filtering of all housing units.

2 – Filtering Model

The filtering model is a statistical relationship between the characteristics of a community and the likelihood that a unit will filter up, down or not at all.⁷⁴ The characteristics of the community include the density of the community, how built out the community is, the community size, the stage of the housing cycle, recent growth in the housing stock, household income, median sales price, and a county-specific fixed effect.

The filtering model is based on a multinomial logit regression. The dependent variable, filtering, can take one of three outcomes: filtered up, filtered down, or did not filter. The multinomial logit regression assesses the relative likelihood that the paired housing transactions of a unit will take one of these three outcomes, given the independent variables shown below.

⁷⁴ This method builds upon Somerville, C. Tsuriel, and Christopher J. Mayer, *Government Regulation and Changes in the Affordable Housing Stock*, FRBNY Economic Policy Review, June 2003.

TABLE 6.4: INDEPENDENT VARIABLES USED IN MULTINOMIAL LOGIT REGRESSION

Variable	Definition	Source
HGrowth00to14	Change in housing stock from 2000 to 2014, per municipality	US Census
hhmedinc	Median Household Income, per census tract	US Census
hhmedincsquared	Squared median income term	US Census
Hunits	Number of Housing Units, per municipality	US Census
medianmunisalesprice	Median value of a sale in the municipality	SRIA
medianpricesquared	Squared median sales value	SRIA
density	Density of municipality housing stock	US Census
pctbuiltout	Percent of estimated "Build Out" limit, per municipality	Econsult Solutions
NJpricepctchg	change in real estate prices in the State of New Jersey	FHFA
NJsquaredpricepctchg	Squared real estate price term	FHFA
county	County geographic fixed effect	NJ COAH

We estimate the model using annual data from 2000 to 2014. For home sales occurring in years without corresponding census data, linear interpolations of the variables are used. Due to the low volatility in the census variables used here (over short-term horizons) linear interpolation is appropriate. The model establishes the outcome of "did not filter" as the base outcome: likelihoods of filtering up or down are expressed relative to the likelihood of not filtering. Coefficients from the multinomial logit regression are expressed as the change in the likelihood of an outcome (with respect to the base outcome), given a unit change in the predictor variable, holding all other variables constant (expressed in log-odd terms).

In terms of magnitude, multinomial logit results are not easy to directly translate, as they are expressed in log-odd terms. Using post-estimation functions, these results can be interpreted as a system of effects on the net probability of either filtering up or down. Results from these post-estimation techniques are discussed below.

3 – Forecasting

To forecast results from the multinomial logit regression, we must create future values for the independent variables used in the regression model, including changes in house and apartment prices, the number of units that will be available to transact, and changes in income, and then apply the parameter estimates.

Prices for owner occupied housing and rental housing move together over the long run, but can diverge in the short run. Owner-occupied housing values are more volatile, and our analysis incorporates housing cycle considerations.⁷⁵ We use an average annual growth rate of 4 percent over the next ten years.⁷⁶ In order to capture the nonlinear movement of prices during that time, we employ an ARIMA regression procedure using historic data from the Federal Housing Finance Agency (FHFA) on owner occupied housing prices dating back to 1975. Rental prices, however, are not anticipated to follow the same cyclical trajectory, as data on average rental rates in New Jersey show a significantly steadier trend than in single family home prices. Because of this, filtering forecasts for apartments are modeled on a smooth trajectory of rental rates. Because cities and urban areas, where much of the rental stock is concentrated, have generally experienced relatively stronger growth than suburban and rural areas than in the past, we use an average annual growth rate in rent of 4.5 percent.

The number of units available to filter also varies between owner occupied units and rental units.⁷⁷ We base the number of owner-occupied units that could potentially filter on an analysis of historic sales volume in New Jersey from 2000 to 2014 to movements in real estate prices. Using this relationship, we forecast the number of single family home sales (and which are therefore available to filter) that will occur in each year. For apartments, we first account for rent controlled units that cannot be expected to behave as though they are market units. There are approximately 100 municipalities with some form of rent control, covering a significant portion of the rental stock in those municipalities. The restrictions imposed by rent control suppress the likelihood of filtering up, and, because the rents are often already below market, they are not anticipated to filter down. Accordingly, the number of units estimated to be under rent control in each applicable municipality are removed from the stock of rental units. The multinomial logit model used to calculate the probability of filtering is based on fifteen years of sales data; the number of sales represented in that data (approximately two million) is approximately equal to the stock of owner occupied houses in New Jersey. Because of this, we assume that the entirety of the rental stock, not covered by rent control, will be available to filter every fifteen years.⁷⁸ Accordingly, we estimate that two thirds of the non-rent controlled rental stock will be available to filter over the next ten years.

Income is anticipated to grow at 2% per year. Municipal density, and percent built out are anticipated to remain at their 2015 levels.

The final step is to apply the parameter estimates from the model in step 2 to the estimated independent variable values for each municipality. We convert the coefficients from the model into aggregate percent probabilities of filtering up or down for each municipality, given the level of

⁷⁵ Federal Housing Finance Agency, *House Price Index*

⁷⁶ Historic rates from 1975-2015 show an average growth rate of approximately 5.3 percent, and rates from 2000-2015 show an average growth rate of approximately 3.5 percent.

⁷⁷ Note that net filtering for a unit cannot be greater than one for any given unit, even if the units itself filters up and down multiple times.

⁷⁸ This is likely very conservative, due to the short-term nature of leases.

the independent variables for each year. This percent is then applied to the base of sales and rentals as described above.⁷⁹ This approach yields an estimate of upward and downward filtering. This number is aggregated for each municipality, and the difference between the two represents the net number of units estimated to be added to or removed from the stock of affordable housing over the 2015 to 2025 period.

Table 6.5 shows the result of the net filtering estimate on the anticipated supply of affordable housing in each region and statewide (see Appendix C for estimates by municipality). Statewide, downward filtering is anticipated to add approximately 151,500 units of affordable housing supply from 2015 to 2025, while upward filtering is anticipated to reduce affordable housing supply by approximately 110,700. Therefore, net filtering is anticipated to increase affordable housing supply by approximately 40,800 units, reducing affordable housing need.

TABLE 6.5: NET FILTERING OF AFFORDABLE HOUSING BY REGION AND STATEWIDE

Region	Units Filtering Down	Units Filtering Up	Net Filtering (Supply Change)
1	26,638	23,149	3,489
2	36,761	16,099	20,662
3	17,189	19,016	(1,827)
4	30,362	22,271	8,091
5	23,444	20,119	3,325
6	17,101	10,025	7,076
State	151,495	110,679	40,816

6.4 ALLOCATION OF SECONDARY SOURCES

The Round 2 methodology is clear that secondary source adjustments apply to both Present and Prospective Need, explaining that “reductions apply to housing need no matter how the need was generated.” (26 N.J.R. 2348) Further, the Round 2 methodology is explicit that, unlike the municipal allocation process described in Section 5, “in the reductions of increases to housing need due to secondary supply and demand, all municipalities, including Urban Aid locations, participate”⁸⁰ (26 N.J.R. 2348). This approach is consistent with the policy allowing Present Need

⁷⁹ With a large enough number of iterations (such as the total number of sales and rental units in a geography), the probability of an event converges on the percent of the population which that probability applies to.

⁸⁰ Note that this directive makes all the more explicit that secondary source adjustments apply against both Present and Prospective Need – since urban aid municipalities have no Prospective Need assignment, by definition they could not “participate”

obligations to be addressed either through rehabilitation of deficient units or creation of new units.⁸¹

We apply secondary source adjustments as follows. First, municipal Prospective Need is adjusted to reflect an increase or decrease in need based on projected secondary supply changes. In cases where these adjustments bring Prospective Need to zero, or in cases where Prospective Need begins at zero (as with urban aid municipalities), remaining adjustments are made to Present Need.

It is possible, however, for a municipality to have a downward secondary source adjustment that is larger than the sum of Present Need and Prospective Need for that municipality. A strict application of secondary sources to such a municipality would result in a *negative* need allocation. In the Round 2 methodology, these units below the “zero bound” for a municipality are simply dropped from the methodology and left unaccounted for. From the perspective of the municipality at the zero bound, whether these units are otherwise accounted for is immaterial, since its need is already zero. However, from the perspective of the region, failing to account for these units creates a mismatch between the identified regional affordable housing need and regional affordable housing supply provided through market-based forces.

This mismatch between affordable housing need and supply is problematic because need is calculated regionally, meaning that LMI household growth anticipated in one county (or in one municipality) spills over into another for the purpose of estimating housing need. Conceptually, the secondary source adjustments partially offset this need, recognizing that a portion of the incremental LMI household population that has been estimated will be housed in units created by the market forces enumerated within the calculation. Logically, this is still true in cases where the municipality has no allocated need – an additional unit created in that municipality still provides housing for an LMI household, thereby reducing by one the housing need for the region. Within the confines of the Prior Round methodology, however, this adjustment is not made properly and regional need is thus improperly inflated. This “zero bound” flaw can theoretically produce a circumstance in which the net effect of secondary source adjustments which collectively add to affordable housing supply is to *increase* rather than *reduce* aggregate municipal affordable housing need.

unless these adjustments could be applied against Present Need. It should also be noted that while qualifying urban aid municipalities do not receive any allocation of the regional Prospective Need, it is possible for those municipalities to have a Secondary Source adjustment that adds to their Prospective Need (in cases where the secondary sources, on net, are estimated to reduce the affordable housing supply in those municipalities). It is therefore possible for a qualifying urban aid municipality to have a Prospective Need greater than zero as a result of secondary source adjustments.

⁸¹ It is important to note that the majority of units are identified as deficient in the Present Need calculation due not to inadequate plumbing or kitchen facilities but due to their designation as “old and overcrowded.” While the creation of a new unit does not address the integrity of a structurally deficient unit, it can alleviate the overcrowding of units. Further, any addition to supply creates effects down the chain of the housing market that may eventually allow the deficient unit to be replaced or demolished.

To correct for this occurrence, additional downward adjustments to need for secondary supply that take place beneath the “zero bound” are summed for each region. These additional secondary source adjustments for each region are then allocated to municipalities in proportion to the share of total regional Present Need and Prospective Need that each municipality represents.⁸² This methodology aligns aggregate municipal need with the increment between changes in LMI housing need and affordable housing supply, as intended.

6.5 SECONDARY SOURCE ADJUSTMENT RESULTS

Table 6.6 shows the results of these adjustments aggregated to the regional level (see Appendix C for estimates by municipality). On net, the three secondary sources of market-based supply (LMI Demolitions, LMI Residential Conversions, and Net Filtering) are estimated to add approximately 42,300 units of affordable housing supply over the ten-year period. Accordingly, aggregate statewide Present Need and Prospective Need decrease by a commensurate level to reflect adjustments for this anticipated supply.⁸³

TABLE 6.6: SECONDARY SOURCE ADJUSTMENTS TO PRESENT NEED AND PROSPECTIVE NEED BY REGION AND STATEWIDE

Region	Present Need	Allocated Prospective Need	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Supply	Adjusted Present Need	Adjusted Prospective Need	Aggregate Need Adjustment
1	28,359	16,649	(3,788)	11,629	3,489	11,330	21,022	12,657	(11,329)
2	20,230	12,628	(3,771)	2,833	20,662	19,724	8,598	4,536	(19,724)
3	7,123	7,542	(1,189)	2,451	(1,827)	(565)	6,147	9,082	564
4	7,434	5,925	(4,168)	2,025	8,091	5,948	4,239	3,171	(5,949)
5	3,542	7,514	(1,937)	99	3,325	1,487	2,712	6,855	(1,489)
6	2,852	646	(3,800)	1,115	7,076	4,391	0	0	(3,498)
State	69,540	50,904	(18,653)	20,152	40,816	42,315	42,718	36,301	(41,425)

Table 6.7 and Figure 6.1 show the results of the secondary source adjustment process described above for two hypothetical municipalities in Region 1. The first municipality is assumed to have a

⁸² For example, suppose the sum of Present and Prospective Need for a municipality represents 2% of the aggregate Present and Prospective Need for the region, and that the “pool” of Remaining Secondary Source Allocation of units below the “zero bound” is 200 units for the region. In this case, the municipality would be allocated an adjustment of four units to reduce allocated need (200 x 2%). This adjustment is first applied to Prospective Need, and then, in cases where Prospective Need is zero, to Present Need. This example is illustrated in Figure 6.1 below.

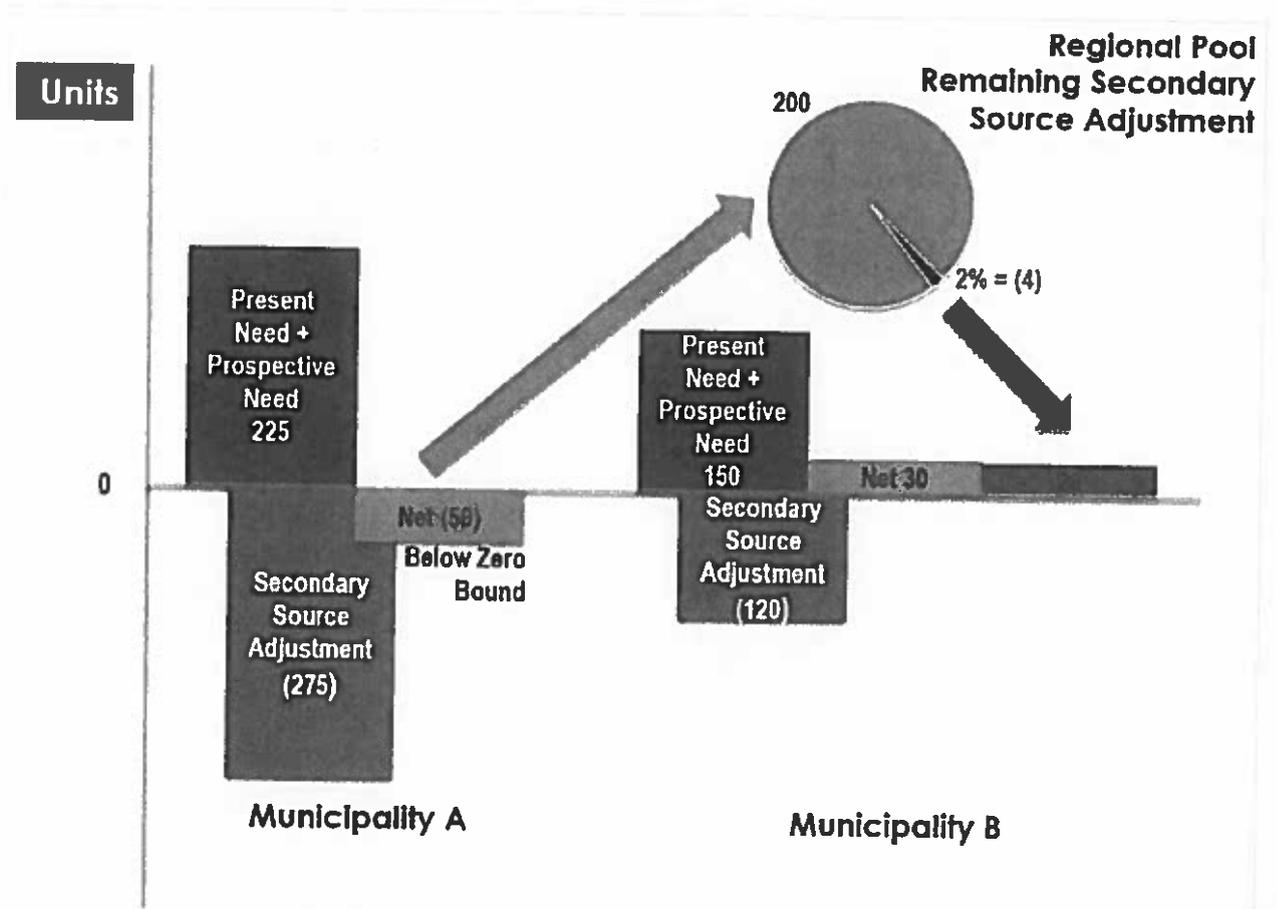
⁸³ Slight differences emerge due to rounding, since a municipality cannot be assigned a partial unit, and because need cannot be reduced below zero in Region 6.

Secondary Source adjustment greater than the sum of their Present and Prospective Need, to illustrate the “zero bound” problem. The second municipality is assumed to have a Secondary Source adjustment less than the sum of their Present and Prospective Need, and thus receives a regional Remaining Secondary Source adjustment. Full results by municipality are shown in Appendix C.

TABLE 6.7: SAMPLE MUNICIPAL ALLOCATION CALCULATION

Category	Calculation	Muni A (units)	Muni B (units)
Region		1	1
(A) Allocated Prospective Need	Sec 4 & 5	100	130
(B) Present Need	Sec 3	125	20
(C) Demolitions (negative)	Sec 6.1	(50)	(25)
(D) Residential Conversions	Sec 6.2	+150	+45
(E) Net Filtering	Sec 6.3	+175	+100
(F) Secondary Source Net	C + D + E	+275	+120
(G) Net Impact on Need (inverted)	(F) * -1	(275)	(120)
(H) Adjusted Prospective Need	A + G (zero bounded)	0	10
(I) Remaining Secondary Source Adjustment	G + (A - H)	(175)	(0)
(J) Adjusted Present Need	B + I (zero bounded)	0	20
(K) Remaining Secondary Source Adjustment	I + (B - J)	(50)	(0)
(L) Regional Remaining Secondary Source Units	Sec 6.4	200	200
(M) Share of Regional Present + Prospective Need	(H + J) / L	0%	2%
(N) Additional Secondary Source Adjustment	(L * M)* -1	(0)	(4)
(O) Sum of Adjusted Present + Prospective Need	H + I + J + K + N	0	26

FIGURE 6.1: SAMPLE MUNICIPAL ALLOCATION OF SECONDARY SOURCE ADJUSTMENTS



7.0 MUNICIPAL HOUSING OBLIGATIONS

The affordable housing calculations described in Sections 3-6 yield a complete estimate of the current affordable housing need and need anticipated to emerge over the next decade. Present Need estimates all deficient housing currently occupied by LMI households, while Prospective Need estimates all additional housing required by the incremental growth in LMI households over ten years. By design, these calculations are non-duplicative and therefore additive, and their sum represents all identifiable housing need for the 2015-2025 period. As detailed in this section, any additive calculations of need above and beyond these categories either double count LMI households already captured within this framework, or attribute a housing need to households that do not currently fall under the FHA definition of need (and in some cases may not even exist). In sum, Present Need and Prospective Need together completely describe the need for affordable housing within the fair share framework.⁸⁴

Importantly, the design and definition of these categories mean that all prior contributions of population shifts, income changes, housing market dynamics, and municipal affordable housing activities are subsumed within the calculation. This was true at the start of Round 1, and it is equally true at the start of any round. By design, the extent to which municipalities have produced affordable housing is captured within the determination of need for the current cycle. Therefore, the degree to which municipalities have satisfied or failed to satisfy their Prior Round obligations does not change the most accurate estimate of the Present Need and Prospective Need for the current cycle from that which has been calculated and reported in Sections 3-6 of this analysis.

However, there is a distinction between affordable housing “need,” which represents identifiable LMI households in need of or anticipated to be in need of housing, and affordable housing “obligations,” which represent legal requirements placed on municipalities related to fulfilling this need. Conceptually, aggregate need should align with aggregate municipal obligations. Historically, however, need and obligations have diverged within the methodology.

There are multiple instances of this divergence. One is municipal allocation caps, which are included in the Round 2 methodology and the Fair Housing Act and are applied to adjust municipal obligations. The 20% cap safeguards against a “drastic alteration” of the established pattern of a community, while the 1,000 unit cap recognizes that imposing fair share obligations on municipalities beyond what could reasonably be achieved given market considerations is impractical and warrants an adjustment.⁸⁵

Another instance is the “carryover” of unfulfilled Prior Round obligations. Though the “carryover” obligations are not mentioned in the FHA, the Round 2 methodology carried forward Round 1 Prospective Need into the Round 2 obligation (against which appropriate activity and credits were

⁸⁴ Section 7.1 discusses more fully the categories of affordable housing need within the FHA framework, and how they account for LMI households of various types.

⁸⁵ Section 7.4 reviews in greater detail the rationale and calculations for the allocation caps.

applied). The Supreme Court has stated that its March 2015 decision “does not eradicate” the unfulfilled portion of the Round 1 and Round 2 obligations, which serve as “the starting point for the determination of a municipality’s fair share responsibility” within the current cycle (221 N.J.1 at 42).

The core reason for this divergence, and the primary challenge in reconciling the identifiable need into assigned obligations, is the need to create a system that provides compliance incentives for municipalities. While unfulfilled obligations from prior cycles do not represent additional identifiable need, ignoring them entirely would discourage municipalities from complying with legally assigned obligations. Therefore, adjustments may need to be undertaken to the Present Need and Prospective Need assigned to each municipality in Sections 3-6 of this report to yield an appropriate municipal obligation. This distinction between identifiable *need* and compliance-based *obligations* has implications for developing an approach that appropriately reconciles these categories into municipal obligations.

- First, it suggests that the obligations for Round 1 and Round 2 as originally assigned by COAH in 1993 are the appropriate standard against which the “unfulfilled” Prior Round (1987-1999) obligations should be determined, as indicated by the Supreme Court decision. While some previous iterations of the methodology have re-calculated prior cycle obligations retrospectively based on observed data on population and housing activity, such a calculation is not necessary for assigning need because this observed data does not have any bearing on the current or future need for affordable housing. The entirety of current and future need within the FHA framework is represented by Present Need and Prospective Need. Instead, Round 1 and Round 2 obligations are relevant only within the compliance-based framework of municipal *obligation*. As suggested by the Courts, the originally assigned Round 1 and Round 2 obligations provide the municipalities with a defined and predictable target that is the appropriate standard for this purpose.
- Second, while obligations have been legally assigned by COAH and upheld by the Courts for Round 1 and Round 2 (1987-1999), no comparable obligations have been legally assigned and upheld for the “gap period” (1999-2015). Since this period generates no identifiable, additive housing need to that calculated for the current cycle, and the period is not associated with a legally defined obligation against which compliance can reasonably be judged, no calculation of additional need is appropriate to conduct for this period.⁸⁶

An ideal methodology for the assignment of obligations would align the aggregate identified housing need (i.e. the sum of the Present Need and Prospective Need) and the aggregate municipal obligations for the current cycle, while simultaneously rewarding municipalities for past (and future) compliance. A potential solution, referred to as the “Offset Method,” is developed and detailed. Unfortunately, as discussed below, this methodology cannot be executed for the current

⁸⁶ Section 7.2 discusses more fully the distinction between the Prior Round (1987-1999) and the “Gap period” (1999-2015), as well as the appropriate source of Prior Round obligations.

cycle given the lack of reliable and uniformly available data on the degree to which Prior Round obligations have been fulfilled.⁸⁷

Therefore, in keeping with the Supreme Court's decision and the approach in Prior Rounds, the "Single Pool Method" is defined and executed to yield initial summary obligations for each municipality.⁸⁸ Within this approach, allocation caps are first applied to the municipal Present Need and Prospective Need emerging from Sections 3-6.⁸⁹ Next, the Prior Round (1987-1999) obligations as initially assigned by COAH in 1993 are carried over and summed with the Present Need and Prospective Need to yield an initial summary obligation for each municipality.⁹⁰ All applicable adjustments, activity and credits must then be demonstrated by municipalities as part of their efforts to identify the correct number and to secure approval of their affordable housing plans.

7.1 CATEGORIES OF AFFORDABLE HOUSING NEED

The Fair Housing Act contains specific guidance on the categories of need that comprise fair share obligations. The FHA provides for the determination of Present Need and Prospective Need at both the regional and municipal level, and does not define any additional categories of need beyond these two (N.J.S.A. 52:27d-301 et. seq.).

These two categories are additive. Present Need enumerates housing needs for low- and moderate-income (LMI) households currently living in deficient housing units. Prospective Need enumerates housing needs for additional LMI households projected to be added over the ten year period (based upon population projections extrapolated into an estimate of incremental growth in eligible LMI households). Together, these categories capture all recognized need as of the start of the Prospective Need period (Present Need), and all recognized need anticipated to be generated during the Prospective Need period (Prospective Need).

This framework is evident in the approach taken to the calculation of Round 1 housing obligations in 1986-87. In keeping with the FHA, the Round 1 methodology calculated obligations for Present Need and Prospective Need, which together represented the sum of all obligations. The Prospective Need calculation was strictly forward-facing, capturing the incremental need anticipated to be generated between 1987 and 1993. By definition, therefore, the Present Need calculated in Round 1 captured all LMI population and housing activity prior as of that point in time. Said another way, the contributions of population shifts, income changes, housing market

⁸⁷ Section 7.3.1 describes this method in detail, and discusses the flaws in available data on prior activity, adjustments and credits.

⁸⁸ Section 7.3.2 describes this method in greater detail.

⁸⁹ Section 7.4 details the mechanics and results of this step.

⁹⁰ The results of this calculation are presented in the aggregate in Section 7.5, and for each municipality in Appendix D.

dynamics, and municipal affordable housing activities up to the beginning of Round 1 were all by definition and by design subsumed within the calculation of Present Need as of that time.

With respect to affordable housing *need*, the circumstances at the beginning of any round of calculations are no different than they were at the start of Round 1. Taken together, Present Need and Prospective Need completely describe the identifiable need for affordable housing within this framework, and any additional calculated *obligation* assigned above and beyond it does not change this *need*. This point can be demonstrated by examining the current circumstances of incremental LMI households that were added to the New Jersey household population in the past. Take for instance an LMI household that moved into the state in 2010.⁹¹ As of the beginning of the current cycle in July 2015, that household by definition is either (a) an LMI household living in deficient housing in New Jersey; (b) an LMI household living in non-deficient housing in New Jersey; or (c) no longer an LMI household living in New Jersey.⁹²

- In the case of (a), *an LMI household living in deficient housing as of July 2015*, this household would be captured in the Present Need calculation. To attribute a “need” for the same household based on the addition of that household to the LMI population at a prior point in time, and to then add that “need” to the sum of Present Need and Prospective Need for the upcoming cycle, would be a clear instance of double counting of the same household.
- In the case of (b), *an LMI household living in non-deficient housing as of July 2015*, this household would not represent an identifiable need for the current cycle within the Present Need and Prospective Need framework set forth in the FHA. They would represent neither a source of current, identifiable need for housing (since the household by definition currently has sound housing), nor a source of anticipated housing need emerging from population growth (since the household by definition is a part of the current population). Logically, therefore, the construction or rehabilitation of an additional unit of affordable housing over the upcoming period is not necessary to accommodate it. This is supported by extensive precedent (discussed in more detail below) excluding cost-burden from the categories of affordable housing need considered within the fair share framework.
- Finally, in the case of (c), *no longer an LMI household living in New Jersey*, this household clearly would not represent housing need for the current cycle. Such a household may have moved to another state, increased its income such that it no longer qualifies as LMI, or may no longer exist at all. Regardless, the construction or rehabilitation of an additional

⁹¹ We recognize that the incremental LMI household growth over a given period that forms the basis for the Prospective Need calculation is not simply the product of migration, but of a host of characteristics, including household formation, income changes (in and out of the LMI category), in and out migration, etc. This example is chosen purely for simplicity. The logic applied here holds for incremental LMI households generated through any of the mechanisms described herein.

⁹² As described in the previous footnote, this may occur through out-migration, a change in income status, a change in household composition, etc.

unit of affordable housing over the upcoming period is self-evidently not necessary to accommodate it.

Any need that is assigned additively to the sum of Present Need and Prospective Need therefore either double counts LMI households already captured within this framework, or wrongly attributes a current housing need to households that are not currently within the FHA definition of need, or in some cases may not even exist.

The Round 2 methodology justifies the addition of Round 1 re-calculated Prospective Need to Present Need and Prospective Need for Round 2 by arguing that if the prior round Prospective Need is not met, “people are forced into more crowded housing or are obliged to pay more than 28 percent of their income for housing” (26 N.J.R. 2348). Both of these concerns are examples of non-additive categories described above:

- In the first case, *people are forced into more crowded housing*, overcrowded housing built before 1960 serves as a metric of housing deficiency in the Present Need calculation. Therefore, if additional LMI households are currently living in old and overcrowded housing as a result of prior population growth, they will be captured in the current Present Need. To calculate a need attributable to those same households from a prior period, and then add that “need” to the Present Need, is a clear instance of double counting in the determination of need for the current period.
- In the second case, *(people are) obliged to pay more than 28 percent of their income for housing*, the Court established in *AMG Realty Co v Warren Tp* that cost-burden factors should not be included in the calculation of low- and moderate-income housing (207 N.J. Super. at 422-423). This point was also confirmed specifically by the Supreme Court’s 2015 ruling (221 N.J. at 33).⁹³ More broadly, those LMI households that are living in sound housing units as of the beginning of the upcoming period do not represent an identifiable affordable housing need for that period, regardless of when they were added to the state’s population. Put another way, while these households have an *income* need, they do not have a *housing* need, and thus any remedy is outside of the fair share affordable housing framework.

Therefore, within the FHA framework for calculating the appropriate LMI housing need for the current cycle, any additions to the sum of Present Need and Prospective Need are unwarranted. **In other words, neither the Prior Round (1987-1999) nor the “gap period” (1999-2015) give rise to any current identifiable housing need on top of or in addition to the Present Need and Prospective Need.**

⁹³ While the FHA discusses the issue of cost-burden in its “Findings” (N.J.S.A. 52:27D-329.11 a. & b), it makes no reference to or provision for the inclusion of cost-burden as a component of the definition of affordable housing need.

7.2 PRIOR ROUND VS. GAP PERIOD OBLIGATIONS

As established above, and by COAH's approach to Round 1, all previous population and housing activity relevant to the calculation of housing need as per the FHA is captured within the Present Need and Prospective Need calculation. However, the Supreme Court has distinguished between municipalities that have and have not satisfied their Prior Round (1987-1999) obligations, ruling as follows in March 2015:

...our decision today does not eradicate the prior round obligations; municipalities are expected to fulfill those obligations. As such, prior unfulfilled housing obligations should be the starting point for a determination of a municipality's fair share responsibility. Cf. In re Adoption of N.J.A.C. 5:96 & 5:97, supra, 416 N.J. Super. at 498-500 (approving, as starting point, imposition of "the same prior round obligations [COAH] had established as the second round obligations in 1993").

[221 N.J. 1 at 42]]

This passage specifically references the approval of the Appellate Court in 2010 of "the same Prior Round obligations [COAH] had established in 1993" (416 N.J. Super). In that case, appellants disputed COAH's decision to maintain Prior Round housing obligations as calculated in 1993, rather than re-calculating those obligations retrospectively based on updated data, as had been done in other iterations of the methodology. The Court found as follows with respect to that issue:

COAH's rationale of providing municipalities with **predictability** and the ability to rely upon COAH's substantive certification of their prior round compliance plans constitutes a reasonable basis...

[416 N.J. Super at 500 (emphasis added)]

The Court therefore has approved the maintenance of the Prior Round (1987-1999) obligations as calculated in 1993, rather than re-calculated for observed population and housing change. This approach is consistent with the notion that these Prior Round figures represent affordable housing *obligation* rather than identifiable affordable housing *need*. As previously discussed, from the standpoint of identifying affordable housing need for the current period, any unfulfilled Prior Round obligations are not additive to the sum of Present Need and Prospective Need. Therefore, a re-calculation of prior cycles is unnecessary to determine *need* – its result would provide no new information as to current and future affordable housing needs. Rather, these remaining obligations are relevant only as a representation of the degree to which municipalities have complied with the dictates legally assigned by COAH and the Courts. The appropriate standard for assessing compliance in this instance is therefore the obligation assigned to municipalities in Round 2 in 1993, as indicated by the Supreme Court decision.

The most accurate data source for these obligations is kept by the New Jersey Department of Community Affairs and was provided to ESI for consideration in this analysis. This data set is

understood to represent the most accurate current understanding of municipal Round 1 and Round 2 obligations as originally assigned in 1993. Aggregate Round 1 and Round 2 obligations sum to 85,853 statewide, differing slightly from the total of 85,964 that had been utilized by COAH in 2008.⁹⁴

As described above, Prior Round (1987-1999) obligations are relevant in the current round not because they represent any unaccounted-for component of identifiable affordable housing need within the FHA framework. Instead, they are relevant because they represent an obligation legally determined by COAH, assigned to municipalities, and upheld by the Courts. No such obligation exists for the "gap" period of 1999-2015. COAH has, on multiple occasions, advanced methodologies for the calculation of such obligations for "Round 3" each of which has been rejected by the Courts or has remained un-adopted. Municipalities have therefore been assigned no legal obligations for this period against which their compliance can reasonably be judged.

Further, as described above, as of the start of the current period, all previous population and housing activity relevant to the calculation of housing need as per the FHA is captured within the upcoming Present Need calculation. Anticipated future growth over the period is captured in the Prospective Need calculation, while municipal compliance with legally assigned obligations is accounted for by using unfulfilled Prior Round obligations as the starting point for determining municipal obligations. Therefore, there is no identifiable housing need within the FHA framework that would be satisfied through the calculation of a retrospective "need" from the gap period, and the addition of any units emerging from a retrospective calculation attempting to capture "prospective need" from the gap period would improperly represent the affordable housing need that exists as of today.

In sum, no legal affordable housing obligation or identifiable additive affordable housing need emerges from the "gap" period. Therefore, none is calculated.

⁹⁴ We understand from COAH that these differences are attributable both to rounding practices and to the failure to recognize urban aid status for two municipalities (Wildwood City in Cape May and Penns Grove in Salem) in previously reported data. In addition, there is one municipality (Harvey Cedars in Ocean County) with a seven unit difference in reported results for which DCA cannot identify the source of the discrepancy.

7.3 RECONCILING PRIOR ROUND (1987-1999) OBLIGATIONS

As previously discussed, the New Jersey Supreme Court has ruled that unfulfilled Prior Round obligations (i.e. those from Round 1 and Round 2, 1987-1999) are not eradicated by the upcoming round. How those Round 1 and Round 2 obligations relate to obligations arising from the upcoming calculation of Present Need and Prospective Need is not specified by the Court. Logically, the dictate that unfulfilled Prior Round obligations "should be the starting point" suggests that these obligations must serve at least as the minimum obligation for the current cycle for a municipality.

As discussed above, the retention of unfulfilled Prior Round obligations across cycles serves as a compliance mechanism, encouraging and rewarding the satisfaction of legally assigned obligations. However, because these obligations do not represent any identifiable current or future need above and beyond that already accounted for in the Present Need and Prospective Need calculations, retaining these obligations can lead to the assignment of aggregate affordable housing obligations greater than the identified need. Thus, there may be a tension between the competing objectives of encouraging compliance and allocating an aggregate obligation that aligns with the identified need for affordable housing in the current period (i.e. Present Need plus Prospective Need). An ideal methodology should strive to achieve both of these objectives simultaneously.

Within this section, we introduce such an approach, which we call the "Offset Method." This system utilizes the unmet Prior Round obligation as part of the allocation method for the assignment of regional need, rather than as a separate and additive component of current obligations. In so doing, this approach fully recognizes the activity or inactivity of municipalities in response to Prior Round obligations, ensuring that compliance with those obligations is rewarded, while simultaneously aligning obligations for the current period with the identified need. This represents our preferred approach to reconciling total obligations, given sufficient information.

However, the Offset Method cannot be executed at this time given the current lack of uniform, reliable data on the extent to which Prior Round obligations have been satisfied. Therefore, we introduce and execute an alternative method (which we call the "Single Pool Method") that does include Prior Round obligations as an additional, additive component above and beyond the calculated Present Need and Prospective Need. Due to the lack of available data, this report makes no attempt to quantify the extent to which those obligations have already been fulfilled by the municipalities. Instead, municipalities would receive appropriate recognition for prior adjustments, activities and credits in their efforts to secure approvals of their affordable housing plans. This approach therefore successfully rewards municipal activity and thereby encourages compliance. However, unlike the preferred Offset Method, it does not align the aggregate housing obligations with the aggregate identified need.

7.3.1 OFFSET METHOD

Given perfect information on the level of applicable adjustments, housing activity and credits applicable to each municipality from the Prior Round, we believe such a system could be instituted that properly recognizes municipal activity and credits while aligning aggregate need and obligations. Assuming the availability of all necessary data, such a system (referred to herein as the "Offset Method") would proceed as follows:

- First, applicable adjustments, housing activity and credits for each municipality would be set against the initially assigned Prior Round (1987-1999) obligations, yielding the unfulfilled Prior Round obligations for each municipality. A municipality that has not fully met its obligations would have a remaining obligation; a municipality that has fully met its obligations would have a zero, and a municipality that has more than satisfied their obligation would have credits towards its newly assigned obligation. These unfulfilled Prior Round obligations (or credits) would remain with each municipality and be used as part of the allocation process of Prospective Need for the current cycle.
- The aggregate total of unfulfilled Prior Round obligations would be calculated for each region. This sum would be deducted (or added) to the regional Prospective Need pool of units to be allocated for the current cycle, since those units would remain allocated to specific municipalities within the current cycle.
- The remaining pool of Prospective Need units in each region (which would sum with the aggregate unfulfilled Prior Round obligations to match the Prospective Need as calculated in Section 4 of this report) would be allocated through the municipal allocation formula (as described in Section 5 of this report).
- The sum of obligations for each municipality would be 1) their unfulfilled Prior Round (1987-1999) obligation, if any, 2) their portion of the remaining regional Prospective Need, and 3) their Present Need. Adjustments would be made for secondary sources and municipal allocation caps. When aggregated regionally, the sum of these obligations (prior to adjustments) aligns with the sum of identified Present Need and Prospective Need for the current cycle.
- This approach both rewards compliance and aligns aggregate obligations with aggregate need. Since unfulfilled obligations are carried over from cycle to cycle, rather than reset, municipalities are appropriately rewarded for activity undertaken to satisfy that obligation, and remain responsible for the unfulfilled portion. Concurrently, aggregate affordable housing obligations in each region are aligned with the identified housing need for the period.

Unfortunately, the Offset Method relies on a crucial data set: reliable, accurate and uniform statewide information on the applicable adjustments, housing activity and credits for each municipality. Such a data set is not available (as discussed below). A reliable calculation of the

“unfulfilled” portion of the Prior Round obligation for each municipality is therefore impossible at this time.

Historically, COAH has attempted to track information on adjustments, activity and credits for each municipality through its “CTM” online unit monitoring program. Results from this data set, updated through July 20, 2015, were provided to ESI by the Department of Community Affairs (as the successor custodian for this information) for consideration in this analysis. Unfortunately, this data source does not appear to be either comprehensive or reliable at this time. We understand from DCA that the data is self-reported by municipalities, and is not subject to any systematic auditing process. This understanding is confirmed by a publicly-released version of results from this program dated March 1, 2011,⁹⁵ which includes the disclaimer: “Inclusion of an affordable housing program or project in this report does not certify that the units exist and/or meet COAH’s criteria for credit.” In addition to the potential for incorrectly reported units, there is also the potential for unreported activity. The 2011 dataset, for example, omits roughly 100 municipalities entirely. The extent to which those values are an accurate reflection of municipalities that have not completed a single unit or are simply a result of the failure of those municipalities to report completions through the CTM system is unknowable at this time.

Despite these caveats, the data set provided by DCA does represent the best and most up to date source of information on municipal adjustments, activity and credits to date. Its use within the calculation could be justified if municipalities have the opportunity to offer corrections and amendments to the reported figures when submitting their housing plans at compliance hearings. While the direction of errors with respect to applicable adjustments, activity and credits in the DCA data set is not known (i.e. the “correct” total may be higher or lower than reported), it is likely that the municipal compliance process would result in an aggregate increase in reported adjustments, activity and credits, since municipalities would only have an incentive to challenge and correct a total that they believe to be under-reported, and many may not have participated in the CTM data base. This process would therefore be likely to reduce the aggregate unfulfilled Prior Round obligations recognized by the Courts below the unfulfilled Prior Round obligation initially calculated from currently available DCA data.

Unfortunately, this adjustment would create significant problems within the Offset Method outlined above. In that procedure, unfulfilled Prior Round obligations are deducted from the Prospective Need allocation pool for each region, aligning regional obligations with identifiable housing need as of the point the calculation is completed. If the aggregate unfulfilled Prior Round obligations for each region are (appropriately) reduced when further adjustments, activity and credits (above and beyond those currently known) are demonstrated in municipal proceedings, the alignment between aggregate obligations and identified need central to the methodology would be altered. Specifically, while known prior adjustments, activity and credits as of the time of the calculation would be properly accounted for in determining the regional Prospective Need allocation pool, no mechanism exists to provide for the addition of further “fulfilled” units to the regional pool (as

⁹⁵ Available from the Department of Community Affairs website at: (<http://www.nj.gov/dca/services/lps/hss/transinfo/reports/units.pdf>)

envisioned by the methodology) if they are demonstrated to the Courts by municipalities after the completion of the calculation. Thus, the Offset Method is conceptually problematic given imperfect information because the obligation for any municipality in part depends on the obligations of each of the other municipalities within its region.

This method, which represents the most conceptually sound approach to incorporating the unfulfilled Prior Round obligations “as a starting point” in the calculation of current cycle obligations, is therefore not employed in this analysis. In its place, a methodology is utilized that does not rely on a uniform tracking of applicable adjustments, activity and credits, but instead allows for municipalities to demonstrate those components on a case by case basis within the compliance process without disrupting the assigned obligations of other municipalities. We note, however, that if a uniform tracking system is implemented for the current round, it would be both possible and advisable to implement this procedure for future cycles.

7.3.2 SINGLE POOL METHOD

Given imperfect information on the degree to which Prior Round obligations have been satisfied, it is necessary to adopt a procedure for the assignment of total municipal obligations that is “adaptive” to the receipt of further information on municipal activities. In other words, the obligation of any given municipality must be severable from those of other municipalities, allowing its obligation to be updated to incorporate the best available information on the level of adjustments, activity and credits demonstrated to the Court within the compliance process.

The methodology employed to calculate initial summary obligations by municipality is referred to herein as the “Single Pool Method.” The steps employed are as follows:

- Calculate the Present Need and Prospective Need for each municipality through the procedures described in Sections 3-6 of this report.
- Applying the municipal allocation caps included in the Round 2 methodology and Fair Housing Act to those Present Need and Prospective Need obligations, yielding a Capped Present Need and Capped Prospective Need for each municipality.⁹⁶
- Sum the Initial Prior Round Obligations (as assigned by COAH in Round 2) with Capped Present Need and Capped Prospective Need to yield an Initial Summary Obligation for each municipality.

The result yielded by this process is referred to as *Initial* summary obligations. This is reflective of the fact that the entirety of assigned Prior Round obligations is included, and no estimate or

⁹⁶ Note that this figure will match the Present Need and Prospective Need described above for any municipality for which caps are not applicable.

determination of adjustments, activity and credits for each municipality is made. Given the lack of reliable and uniform statewide data, this component is best determined on a case by case basis within the municipal compliance process. Within that process, municipalities would have the opportunity to demonstrate adjustments, activity and credits which would reduce their initial summary obligation.⁹⁷

While not our preferred method, this method follows closely the Supreme Court's directive both in its adherence to the Round 2 methodology and in its use of Prior Round obligations as the starting point for municipal obligations in the current cycle. It also allows municipalities to receive appropriate recognition for prior adjustments, activities and credits in their efforts to secure approvals of their affordable housing plans. Individual obligations will be "responsive" to the updated information introduced through those proceedings without adversely impacting the obligations of other municipalities. As a consequence, however, the aggregate identified housing need does not align with the aggregate obligation assigned to municipalities within this methodology.

7.4 MUNICIPAL ALLOCATION CAPS

The Round 2 methodology and Fair Housing Act require that allocation caps be applied to municipal affordable housing obligations. These caps serve different purposes articulated by the Legislature in the Fair Housing Act:

1. The 20% cap applies to "new construction" need (i.e. Prospective Need) and was included in both the Round 1 and Round 2 methodologies to implement the Legislature's desire to avoid fair share obligations resulting in "the established pattern of development in a community (being) drastically altered" (N.J.S.A. 52:27D-307 c.2(b)).
2. The 1,000 unit cap, by contrast, applies to a municipality's "fair share of housing units" (i.e. both Present and Prospective Need). This cap was enshrined legislatively to Section 307 e of the Fair Housing Act in 1993 after it was invalidated as part of the Round 1 rules by the Appellate Court in 1990 (244 N.J.Super, 438,453). This cap reflects the Legislature's recognition that it is impractical to assign affordable housing obligation beyond what could reasonably be achieved given market considerations. The Legislature gauged whether a municipality could create a "realistic opportunity" for more than 1,000 LMI units based on the volume of residential certificates of occupancy issued in the municipality over the previous ten years (N.J.S.A. 52:27D-307 e).

⁹⁷ The Round 2 methodology describes its adjustments for "Prior Cycle Activities" and "Prior Cycle Credits" as follows: "The reduction for prior-cycle activities is subtracted from Pre-Credited Need; it cannot reduce Pre-Credited Need below zero. Any unexpended reduction is carried over to the next cycle....Prior-Cycle credits cannot reduce an obligation below zero. Unexpended credits are carried over to the next affordable housing calculation." (26 N.J.R. 2350). Prior-Cycle credits include "low- and moderate-income housing of adequate standard constructed subsequent to April 1, 1980." (Ibid).

7.4.1 20% CAP

The Round 2 methodology limits the new construction obligation for any municipality to 20 percent of its current occupied housing stock. The rationale for this cap is described as follows in the Round 2 methodology:

The derivation of this limit reflects a desire by COAH not to overwhelm local communities....such that the community would experience 'drastic alteration' from these activities. 'Drastic alteration' has been defined as the doubling of a community's housing stock due to the presence of both inclusionary affordable housing and simultaneously delivered market units at a rate of 1:4.⁹⁸

[26 N.J.R. 2350]

We replicate this methodology after developing an estimate of occupied units as of June 30, 2015 (the start of the Prospective Need period). This estimate starts with occupied units by municipality as reported in the 2009-2013 American Community Survey. To this base, it adds certificates of occupancy and subtracts demolitions for a four-year period (as reported by DCA, by municipality) to update the estimate of occupied units to June 30, 2015.⁹⁹

This 2015 estimate is then multiplied by 20%, and the result is compared to the Prospective Need (adjusted for secondary sources as described in Section 6) for each municipality. The lower of the two figures is utilized as the municipal obligation, meaning that a municipality's Prospective Need obligation is either retained or capped at 20% of its occupied housing stock.

Table 7.1 shows the impact of the application of the 20% cap on the sum of municipal Prospective Need obligations by region and statewide. In total, 10 municipalities are impacted by this cap, reducing their aggregate obligation by approximately 600 units.

⁹⁸ It is worth noting that the referenced standard of four market rate units per one inclusionary unit is an assumption, rather than drawn from a specific data source. Data indicating a different ratio in practice would imply a different cap (for example a 5:1 ratio would imply a cap of (1/6), or 16.67%. Absent a defined data source with which to update and validate this assumption, the cap level is retained at 20% in this procedure.

⁹⁹ As described in Section 3, the midpoint of 2009-2013 is 2011, meaning that its results are best interpreted as representing occupied units "as of" 2011. Accordingly, 50% of annual CO's and demolitions for 2011 are applied, as well as all COs and demolitions from 2012, 2013, 2014 and January-June 2015.

TABLE 7.1: IMPACT OF 20% CAP BY REGION AND STATEWIDE

Region	Adjusted Prospective Need	Municipalities Impacted by 20% Cap	Capped Units (20% Cap)	Revised Prospective Need (20% Cap)
1	12,657	6	(470)	12,187
2	4,536	0	0	4,536
3	9,082	1	(16)	9,066
4	3,171	0	0	3,171
5	6,855	3	(85)	6,770
6	0	0	0	0
State	36,301	10	(571)	35,730

7.4.2 1,000 UNIT CAP

Next, the 1,000 unit cap is applied to the sum of Present Need and Prospective Need. The legislative basis for the 1,000 unit cap is a 1993 amendment to the Fair Housing Act, which states:

No municipality shall be required to address a fair share of housing units affordable to households with a gross household income of less than 80% of the median gross household income beyond 1,000 units within ten years.

[N.J.S.A 52:27D-307 e. (emphasis added)]

The phrase “fair share” also appears earlier in Section 307 of the FHA, where COAH is given the duty to “adopt criteria and guidelines for: Municipal determination of its present and prospective fair share of the housing need in a given region...” (N.J.S.A 52:27D-307 c.1). This definition was incorporated by COAH into amendments to its Round 2 methodology,¹⁰⁰ which applied the 1,000 unit cap against the sum of all housing obligations.¹⁰¹

The language setting forth the 1,000 unit cap in the FHA also specifies that the 1,000 unit cap does not apply to municipalities that have issued more than 5,000 certificates of occupancy in the

¹⁰⁰ See: N.J.A.C. 5:93-14.1, which begins “No municipality shall be required to address a fair share beyond 1,000 units...”

¹⁰¹ COAH’s Round 3 methodology deviated from this approach, applying the 1,000 unit cap against only Prospective Need obligations. This provision was challenged by Egg Harbor Township as part of the Appellate Court decision rejecting the “Growth Share” approach in 2010. The Appellate Court did not rule on the issue because it invalidated the regulations pursuant to which COAH defined the Round 3 obligation of the Township (this action eliminated the Round 3 obligation proposed by COAH, therefore reducing the Township’s obligation below 1,000 units and rendering the applicability of the 1000 unit cap moot in the Court’s opinion). (416 N.J. Super)

preceding ten-year period, since this activity demonstrates that “it is likely” that the municipality could “create a realistic opportunity” for more than 1,000 LMI units within the ten-year period.¹⁰² Pursuant to this standard, data on certificates of occupancy (as reported by DCA, by municipality) are aggregated from 2005 to 2014 to determine if any municipalities have exceeded 5,000 certificates of occupancy over the previous ten years, and are thus not eligible for application of the 1,000 unit cap. Both Jersey City¹⁰³ and Newark have issued more than 5,000 CO’s and are therefore not eligible for this cap.

For the remainder of municipalities, Present Need and Prospective Need obligations are summed. Those municipalities with less than 1,000 units of combined Present Need and Prospective Need maintain those figures unadjusted as their obligation. For those municipalities with more than 1,000 units of combined need, Prospective Need is reduced until the sum of Prospective Need and Present Need reaches 1,000 units. In cases where Present Need is greater than 1,000, this step reduces Prospective Need to zero. In those cases, Present Need is then reduced to 1,000 to yield a sum of Prospective and Present Need of 1,000 units.

Table 7.2 shows the impact of the application of the 1,000 unit cap on the sum of municipal Present and Prospective Need obligations by region and statewide. In total, 10 municipalities are impacted by this cap, reducing their aggregate obligation by approximately 11,200 units.

¹⁰² The full relevant passage from the FHA is as follows: “Unless it is demonstrated...that it is likely that the municipality through its zoning powers could create a realistic opportunity for more than 1,000 low and moderate income units within that ten-year period. For the purposes of this section, the facts and circumstances which shall determine whether a municipality’s fair share shall exceed 1,000 units, as provided above, shall be a finding that the municipality has issued more than 5,000 certificates of occupancy for a residential period in the ten-year period preceding...” (N.J.S.A 52:27D-307(e))

¹⁰³ While the sum of Newark’s Present Need and Prospective Need is less than 1,000 units, the sum of Jersey City’s Present Need and Prospective Need is 5,583 units, which remains uncapped due to this provision. It is unclear if a higher cap may apply to Jersey City based on its level of growth over 10 years (in which it issued 5,523 Certificates of Occupancy), rather than no cap at all. For example, the 5,000 certificate of occupancy threshold is the basis for a determination that more than 1,000 units are “realistic,” the same ratio of 5:1 would imply a cap of 1,105 (5,523 / 5).

TABLE 7.2: IMPACT OF 1,000 UNIT CAP BY REGION AND STATEWIDE

Region	Adjusted Present Need	Revised Prospective Need ¹⁰⁴	Municipalities Impacted by 1,000 Unit Cap	Capped Units (1,000 Cap)	Capped Present Need	Capped Prospective Need
1	21,022	12,187	5	(6,260)	15,289	11,660
2	8,598	4,536	1	(3,247)	5,351	4,536
3	6,147	9,066	4	(1,715)	5,608	7,890
4	4,239	3,171	0	0	4,239	3,171
5	2,712	6,770	0	0	2,712	6,770
6	0	0	0	0	0	0
State	42,718	35,730	10	(11,222)	33,199	34,027

7.4.3 MUNICIPAL ALLOCATION CAP RESULTS

Table 7.3 shows the impact of the successive application of the 20% and 1,000 unit municipal allocation caps, respectively, on the municipal obligations for Present Need and Prospective Need by region and statewide. Full results by municipality are shown in Appendix D.

TABLE 7.3: COMBINED IMPACT OF 20% AND 1,000 UNIT CAP BY REGION AND STATEWIDE

Region	Adjusted Present Need	Adjusted Prospective Need	Munis w/ 20% Cap	Capped Units (20% Cap)	Munis w/ 1,000 Unit Cap	Capped Units (1,000 Cap)	Capped Present Need	Capped Prospective Need
1	21,022	12,657	6	(470)	5	(6,260)	15,289	11,660
2	8,598	4,536	0	0	1	(3,247)	5,351	4,536
3	6,147	9,082	1	(16)	4	(1,715)	5,608	7,890
4	4,239	3,171	0	0	0	0	4,239	3,171
5	2,712	6,855	3	(85)	0	0	2,712	6,770
6	0	0	0	0	0	0	0	0
State	42,718	36,301	10	(571)	10	(11,222)	33,199	34,027

¹⁰⁴ Note that this revised Prospective Need is reflective of the application of the 20% cap to municipal Prospective Need obligations. It is in theory possible for both caps to apply to a municipality.

7.5 INITIAL SUMMARY OBLIGATIONS

Capped Present Need and Capped Prospective Need represent two of the three components of the initial summary obligation within the Single Pool Method (as described in Section 7.3.2.). The third component is the Prior Round (1987-1999) obligation for each municipality, as initially assigned by COAH in 1993 (as described in Section 7.2). These three components are summed to produce the Initial Summary Obligation for each municipality. The results of this calculation are shown at the region and statewide level in Table 7.4 below. Full results by municipality are shown in Appendix D.

TABLE 7.4: INITIAL SUMMARY OBLIGATIONS BY REGION AND STATEWIDE

Region	Prior Round (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation
1	12,469	15,289	11,660	39,418
2	9,382	5,351	4,536	19,269
3	13,323	5,608	7,890	26,821
4	27,367	4,239	3,171	34,777
5	14,055	2,712	6,770	23,537
6	9,257	0	0	9,257
State	85,853	33,199	34,027	153,079

The Initial Summary Obligation includes no estimate or determination of the level of adjustments, activity or credits applicable to each municipality. Each municipality would then have the opportunity to demonstrate this component to the Courts, thereby reducing their Initial Summary Obligation, on a case by case basis in their efforts to secure approvals of their affordable housing plans. This approach builds in verification and incorporation of the most up to date and reliable information on municipal activities on a case by case basis.

APPENDIX A: PRESENT NEED BY MUNICIPALITY

TABLE A.1: UNIQUE DEFICIENT LMI HOUSING UNITS BY MUNICIPALITY (ACS 2009-2013)

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Allendale borough	Bergen	1	0	0	18	18	60.2%	11
Alpine borough	Bergen	1	0	0	4	4	60.2%	2
Bergenfield borough	Bergen	1	30	176	26	232	60.2%	140
Bogota borough	Bergen	1	52	20	33	105	60.2%	63
Carlstadt borough	Bergen	1	0	46	0	46	60.2%	28
Cliffside Park borough	Bergen	1	12	195	34	241	60.2%	145
Closter borough	Bergen	1	0	0	0	0	60.2%	0
Cresskill borough	Bergen	1	12	16	30	58	60.2%	35
Demarest borough	Bergen	1	0	0	0	0	60.2%	0
Dumont borough	Bergen	1	0	49	6	55	60.2%	33
East Rutherford borough	Bergen	1	124	41	86	251	60.2%	151
Edgewater borough	Bergen	1	0	4	0	4	60.2%	2
Elmwood Park borough	Bergen	1	0	98	0	98	60.2%	59
Emerson borough	Bergen	1	0	0	64	64	60.2%	39
Englewood city	Bergen	1	81	367	82	530	60.2%	319
Englewood Cliffs borough	Bergen	1	0	2	0	2	60.2%	1
Fair Lawn borough	Bergen	1	87	69	54	210	60.2%	127
Fairview borough	Bergen	1	77	271	48	396	60.2%	239
Fort Lee borough	Bergen	1	49	248	71	368	60.2%	222
Franklin Lakes borough	Bergen	1	23	2	14	39	60.2%	23
Garfield city	Bergen	1	15	199	44	258	60.2%	155
Glen Rock borough	Bergen	1	0	18	2	20	60.2%	12
Hackensack city	Bergen	1	143	475	149	767	60.2%	462
Harrington Park borough	Bergen	1	0	7	0	7	60.2%	4
Hasbrouck Heights borough	Bergen	1	0	94	0	94	60.2%	57
Haworth borough	Bergen	1	0	0	0	0	60.2%	0
Hillsdale borough	Bergen	1	0	20	0	20	60.2%	12
Ho-Ho-Kus borough	Bergen	1	0	11	0	11	60.2%	7
Leonia borough	Bergen	1	10	104	0	114	60.2%	69
Little Ferry borough	Bergen	1	52	107	38	197	60.2%	119
Lodi borough	Bergen	1	50	129	86	265	60.2%	160
Lyndhurst township	Bergen	1	95	95	75	265	60.2%	160
Mahwah township	Bergen	1	41	24	26	91	60.2%	55
Maywood borough	Bergen	1	0	29	11	40	60.2%	24
Midland Park borough	Bergen	1	0	0	34	34	60.2%	20
Montvale borough	Bergen	1	0	6	0	6	60.2%	4
Moonachie borough	Bergen	1	14	14	9	37	60.2%	22

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
New Milford borough	Bergen	1	0	63	6	69	60.2%	42
North Arlington borough	Bergen	1	78	62	66	206	60.2%	124
Northvale borough	Bergen	1	0	8	0	8	60.2%	5
Norwood borough	Bergen	1	0	3	0	3	60.2%	2
Oakland borough	Bergen	1	9	0	26	35	60.2%	21
Old Tappan borough	Bergen	1	0	3	12	15	60.2%	9
Oradell borough	Bergen	1	0	18	0	18	60.2%	11
Palisades Park borough	Bergen	1	0	197	33	230	60.2%	139
Paramus borough	Bergen	1	15	72	92	179	60.2%	108
Park Ridge borough	Bergen	1	22	76	46	144	60.2%	87
Ramsey borough	Bergen	1	8	53	5	66	60.2%	40
Ridgefield borough	Bergen	1	55	99	34	188	60.2%	113
Ridgefield Park village	Bergen	1	57	128	36	221	60.2%	133
Ridgewood village	Bergen	1	0	15	17	32	60.2%	19
River Edge borough	Bergen	1	0	60	0	60	60.2%	36
River Vale township	Bergen	1	0	8	16	24	60.2%	14
Rochelle Park township	Bergen	1	0	0	0	0	60.2%	0
Rockleigh borough	Bergen	1	0	0	0	0	60.2%	0
Rutherford borough	Bergen	1	48	146	30	224	60.2%	135
Saddle Brook township	Bergen	1	0	58	0	58	60.2%	35
Saddle River borough	Bergen	1	0	10	47	57	60.2%	34
South Hackensack township	Bergen	1	36	16	23	75	60.2%	45
Teaneck township	Bergen	1	18	122	53	193	60.2%	116
Tenafly borough	Bergen	1	0	47	0	47	60.2%	28
Teterboro borough	Bergen	1	0	0	0	0	60.2%	0
Upper Saddle River borough	Bergen	1	0	9	0	9	60.2%	5
Waldwick borough	Bergen	1	39	15	24	78	60.2%	47
Wallington borough	Bergen	1	21	90	23	134	60.2%	81
Washington township	Bergen	1	0	0	0	0	60.2%	0
Westwood borough	Bergen	1	15	35	24	74	60.2%	45
Woodcliff Lake borough	Bergen	1	0	7	13	20	60.2%	12
Wood-Ridge borough	Bergen	1	0	0	0	0	60.2%	0
Wyckoff township	Bergen	1	0	0	48	48	60.2%	29
Bayonne city	Hudson	1	57	870	91	1,018	73.4%	747
East Newark borough	Hudson	1	12	5	4	21	73.4%	15
Guttenberg town	Hudson	1	13	63	11	87	73.4%	64
Harrison town	Hudson	1	72	212	43	327	73.4%	240
Hoboken city	Hudson	1	120	255	58	433	73.4%	318
Jersey City	Hudson	1	1,088	4,028	855	5,971	73.4%	4,384
Kearny town	Hudson	1	29	301	36	366	73.4%	269
North Bergen township	Hudson	1	205	747	155	1,107	73.4%	813
Secaucus town	Hudson	1	0	69	8	77	73.4%	57
Union City	Hudson	1	278	2,070	196	2,544	73.4%	1,868

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Weehawken township	Hudson	1	0	236	34	270	73.4%	198
West New York town	Hudson	1	27	1,143	117	1,287	73.4%	945
Bloomington borough	Passaic	1	0	55	0	55	84.2%	46
Clifton city	Passaic	1	56	1,933	81	2,070	84.2%	1,742
Haledon borough	Passaic	1	13	85	0	98	84.2%	82
Hawthorne borough	Passaic	1	12	74	14	100	84.2%	84
Little Falls township	Passaic	1	43	59	36	138	84.2%	116
North Haledon borough	Passaic	1	0	0	0	0	84.2%	0
Passaic city	Passaic	1	193	5,443	210	5,846	84.2%	4,921
Paterson city	Passaic	1	157	4,240	153	4,550	84.2%	3,830
Pompton Lakes borough	Passaic	1	0	58	0	58	84.2%	49
Prospect Park borough	Passaic	1	0	55	0	55	84.2%	46
Ringwood borough	Passaic	1	3	14	2	19	84.2%	16
Totowa borough	Passaic	1	10	105	15	130	84.2%	109
Wanaque borough	Passaic	1	35	39	0	74	84.2%	62
Wayne township	Passaic	1	117	49	95	261	84.2%	220
West Milford township	Passaic	1	41	22	24	87	84.2%	73
Woodland Park borough	Passaic	1	0	195	25	220	84.2%	185
Andover borough	Sussex	1	0	0	0	0	56.9%	0
Andover township	Sussex	1	0	1	7	8	56.9%	5
Branchville borough	Sussex	1	0	0	2	2	56.9%	1
Byram township	Sussex	1	5	12	25	42	56.9%	24
Frankford township	Sussex	1	29	2	12	43	56.9%	24
Franklin borough	Sussex	1	0	19	14	33	56.9%	19
Fredon township	Sussex	1	7	0	23	30	56.9%	17
Green township	Sussex	1	0	0	0	0	56.9%	0
Hamburg borough	Sussex	1	0	18	0	18	56.9%	10
Hampton township	Sussex	1	5	0	5	10	56.9%	6
Hardyston township	Sussex	1	0	5	23	28	56.9%	16
Hopatcong borough	Sussex	1	30	18	29	77	56.9%	44
Lafayette township	Sussex	1	0	0	0	0	56.9%	0
Montague township	Sussex	1	0	0	0	0	56.9%	0
Newton town	Sussex	1	59	87	86	232	56.9%	132
Ogdensburg borough	Sussex	1	0	1	8	9	56.9%	5
Sandyston township	Sussex	1	0	2	6	8	56.9%	5
Sparta township	Sussex	1	24	2	19	45	56.9%	26
Stanhope borough	Sussex	1	0	8	0	8	56.9%	5
Stillwater township	Sussex	1	0	0	0	0	56.9%	0
Sussex borough	Sussex	1	4	0	12	16	56.9%	9
Vernon township	Sussex	1	0	62	0	62	56.9%	35
Walpack township	Sussex	1	0	0	0	0	56.9%	0
Wantage township	Sussex	1	0	2	5	7	56.9%	4
Belleville township	Essex	2	173	894	117	1,184	76.1%	901

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Bloomfield township	Essex	2	107	479	76	662	76.1%	504
Caldwell borough	Essex	2	0	13	14	27	76.1%	21
Cedar Grove township	Essex	2	0	21	0	21	76.1%	16
City of Orange township	Essex	2	133	1,021	132	1,286	76.1%	979
East Orange city	Essex	2	165	504	202	871	76.1%	663
Essex Fells borough	Essex	2	0	0	0	0	76.1%	0
Fairfield township	Essex	2	0	0	44	44	76.1%	33
Glen Ridge borough	Essex	2	19	0	11	30	76.1%	23
Irvington township	Essex	2	222	802	191	1,215	76.1%	925
Livingston township	Essex	2	15	0	13	28	76.1%	21
Maplewood township	Essex	2	0	106	35	141	76.1%	107
Millburn township	Essex	2	60	68	17	145	76.1%	110
Montclair township	Essex	2	17	94	44	155	76.1%	118
Newark city	Essex	2	837	3,417	826	5,080	76.1%	3,866
North Caldwell borough	Essex	2	12	14	7	33	76.1%	25
Nutley township	Essex	2	9	386	5	400	76.1%	304
Roseland borough	Essex	2	0	0	0	0	76.1%	0
S. Orange Village township	Essex	2	0	7	0	7	76.1%	5
Verona township	Essex	2	0	17	0	17	76.1%	13
West Caldwell township	Essex	2	8	24	14	46	76.1%	35
West Orange township	Essex	2	45	245	150	440	76.1%	335
Boonton town	Morris	2	25	37	4	66	57.9%	38
Boonton township	Morris	2	0	4	25	29	57.9%	17
Butler borough	Morris	2	0	45	5	50	57.9%	29
Chatham borough	Morris	2	0	0	0	0	57.9%	0
Chatham township	Morris	2	0	26	50	76	57.9%	44
Chester borough	Morris	2	11	0	6	17	57.9%	10
Chester township	Morris	2	23	0	13	36	57.9%	21
Denville township	Morris	2	41	13	9	63	57.9%	36
Dover town	Morris	2	115	255	71	441	57.9%	255
East Hanover township	Morris	2	16	0	29	45	57.9%	26
Florham Park borough	Morris	2	0	4	97	101	57.9%	59
Hanover township	Morris	2	0	21	19	40	57.9%	23
Harding township	Morris	2	0	0	0	0	57.9%	0
Jefferson township	Morris	2	40	5	41	86	57.9%	50
Kinnelon borough	Morris	2	0	3	0	3	57.9%	2
Lincoln Park borough	Morris	2	12	9	0	21	57.9%	12
Long Hill township	Morris	2	0	10	7	17	57.9%	10
Madison borough	Morris	2	0	18	10	28	57.9%	16
Mendham borough	Morris	2	9	0	5	14	57.9%	8
Mendham township	Morris	2	30	0	0	30	57.9%	17
Mine Hill township	Morris	2	0	5	0	5	57.9%	3
Montville township	Morris	2	12	5	7	24	57.9%	14



Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Morris township	Morris	2	23	9	13	45	57.9%	26
Morris Plains borough	Morris	2	0	13	29	42	57.9%	24
Morristown town	Morris	2	61	174	11	246	57.9%	143
Mountain Lakes borough	Morris	2	0	2	0	2	57.9%	1
Mount Arlington borough	Morris	2	0	1	20	21	57.9%	12
Mount Olive township	Morris	2	62	19	109	190	57.9%	110
Netcong borough	Morris	2	7	11	9	27	57.9%	16
Parsippany-Troy Hills twp	Morris	2	89	116	98	303	57.9%	176
Pequannock township	Morris	2	49	0	47	96	57.9%	56
Randolph township	Morris	2	0	22	25	47	57.9%	27
Riverdale borough	Morris	2	0	3	0	3	57.9%	2
Rockaway borough	Morris	2	0	24	0	24	57.9%	14
Rockaway township	Morris	2	6	32	3	41	57.9%	24
Roxbury township	Morris	2	12	4	24	40	57.9%	23
Victory Gardens borough	Morris	2	3	20	0	23	57.9%	13
Washington township	Morris	2	7	6	0	13	57.9%	8
Wharton borough	Morris	2	34	83	19	136	57.9%	79
Berkeley Heights township	Union	2	8	10	0	18	73.4%	13
Clark township	Union	2	6	26	8	40	73.4%	29
Cranford township	Union	2	0	49	67	116	73.4%	85
Elizabeth city	Union	2	750	5,466	491	6,707	73.4%	4,925
Fanwood borough	Union	2	0	0	23	23	73.4%	17
Garwood borough	Union	2	10	29	5	44	73.4%	32
Hillside township	Union	2	66	241	33	340	73.4%	250
Kenilworth borough	Union	2	0	3	0	3	73.4%	2
Linden city	Union	2	73	379	95	547	73.4%	402
Mountainside borough	Union	2	80	0	65	145	73.4%	106
New Providence borough	Union	2	0	70	0	70	73.4%	51
Plainfield city	Union	2	114	1,084	91	1,289	73.4%	946
Rahway city	Union	2	8	126	68	202	73.4%	148
Roselle borough	Union	2	49	213	67	329	73.4%	242
Roselle Park borough	Union	2	17	97	9	123	73.4%	90
Scotch Plains township	Union	2	28	45	34	107	73.4%	79
Springfield township	Union	2	0	3	0	3	73.4%	2
Summit city	Union	2	91	33	73	197	73.4%	145
Union township	Union	2	26	424	25	475	73.4%	349
Westfield town	Union	2	18	37	32	87	73.4%	64
Winfield township	Union	2	0	28	0	28	73.4%	21
Allamuchy township	Warren	2	40	0	13	53	77.5%	41
Alpha borough	Warren	2	11	2	0	13	77.5%	10
Belvidere town	Warren	2	0	0	8	8	77.5%	6
Blairstown township	Warren	2	0	0	0	0	77.5%	0
Franklin township	Warren	2	0	0	0	0	77.5%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Frelinghuysen township	Warren	2	0	0	0	0	77.5%	0
Greenwich township	Warren	2	0	0	0	0	77.5%	0
Hackettstown town	Warren	2	0	148	0	148	77.5%	115
Hardwick township	Warren	2	2	1	0	3	77.5%	2
Harmony township	Warren	2	0	1	0	1	77.5%	1
Hope township	Warren	2	4	1	0	5	77.5%	4
Independence township	Warren	2	0	0	0	0	77.5%	0
Knowlton township	Warren	2	0	7	8	15	77.5%	12
Liberty township	Warren	2	0	0	0	0	77.5%	0
Lopatcong township	Warren	2	0	0	0	0	77.5%	0
Mansfield township	Warren	2	0	20	0	20	77.5%	15
Oxford township	Warren	2	16	11	0	27	77.5%	21
Phillipsburg town	Warren	2	45	107	48	200	77.5%	155
Pohatcong township	Warren	2	0	8	0	8	77.5%	6
Washington borough	Warren	2	0	13	8	21	77.5%	16
Washington township	Warren	2	0	7	0	7	77.5%	5
White township	Warren	2	15	0	42	57	77.5%	44
Alexandria township	Hunterdon	3	20	0	13	33	82.5%	27
Bethlehem township	Hunterdon	3	0	4	0	4	82.5%	3
Bloomsbury borough	Hunterdon	3	0	2	0	2	82.5%	2
Califon borough	Hunterdon	3	0	0	0	0	82.5%	0
Clinton town	Hunterdon	3	0	17	0	17	82.5%	14
Clinton township	Hunterdon	3	12	0	8	20	82.5%	17
Delaware township	Hunterdon	3	14	7	0	21	82.5%	17
East Amwell township	Hunterdon	3	0	3	0	3	82.5%	2
Flemington borough	Hunterdon	3	0	72	0	72	82.5%	59
Franklin township	Hunterdon	3	0	0	0	0	82.5%	0
Frenchtown borough	Hunterdon	3	0	0	2	2	82.5%	2
Glen Gardner borough	Hunterdon	3	3	3	2	8	82.5%	7
Hampton borough	Hunterdon	3	0	14	0	14	82.5%	12
High Bridge borough	Hunterdon	3	0	42	0	42	82.5%	35
Holland township	Hunterdon	3	59	0	31	90	82.5%	74
Kingwood township	Hunterdon	3	0	5	0	5	82.5%	4
Lambertville city	Hunterdon	3	37	11	25	73	82.5%	60
Lebanon borough	Hunterdon	3	0	4	0	4	82.5%	3
Lebanon township	Hunterdon	3	0	3	0	3	82.5%	2
Milford borough	Hunterdon	3	0	1	0	1	82.5%	1
Raritan township	Hunterdon	3	0	2	31	33	82.5%	27
Readington township	Hunterdon	3	69	0	46	115	82.5%	95
Stockton borough	Hunterdon	3	0	0	0	0	82.5%	0
Tewksbury township	Hunterdon	3	0	0	0	0	82.5%	0
Union township	Hunterdon	3	0	1	0	1	82.5%	1
West Amwell township	Hunterdon	3	0	0	0	0	82.5%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Carteret borough	Middlesex	3	7	184	4	195	71.0%	139
Cranbury township	Middlesex	3	0	6	0	6	71.0%	4
Dunellen borough	Middlesex	3	0	12	0	12	71.0%	9
East Brunswick township	Middlesex	3	16	48	45	109	71.0%	77
Edison township	Middlesex	3	158	391	177	726	71.0%	516
Helmetta borough	Middlesex	3	0	8	0	8	71.0%	6
Highland Park borough	Middlesex	3	0	92	17	109	71.0%	77
Jamesburg borough	Middlesex	3	0	45	0	45	71.0%	32
Metuchen borough	Middlesex	3	32	46	20	98	71.0%	70
Middlesex borough	Middlesex	3	41	47	0	88	71.0%	63
Milltown borough	Middlesex	3	0	44	0	44	71.0%	31
Monroe township	Middlesex	3	41	0	95	136	71.0%	97
New Brunswick city	Middlesex	3	204	1,523	166	1,893	71.0%	1,345
North Brunswick township	Middlesex	3	29	188	36	253	71.0%	180
Old Bridge township	Middlesex	3	74	148	41	263	71.0%	187
Perth Amboy city	Middlesex	3	116	941	90	1,147	71.0%	815
Piscataway township	Middlesex	3	96	222	58	376	71.0%	267
Plainsboro township	Middlesex	3	0	18	0	18	71.0%	13
Sayreville borough	Middlesex	3	42	115	31	188	71.0%	134
South Amboy city	Middlesex	3	0	50	0	50	71.0%	36
South Brunswick township	Middlesex	3	22	38	88	148	71.0%	105
South Plainfield borough	Middlesex	3	34	48	12	94	71.0%	67
South River borough	Middlesex	3	45	139	28	212	71.0%	151
Spotswood borough	Middlesex	3	0	20	0	20	71.0%	14
Woodbridge township	Middlesex	3	38	452	47	537	71.0%	381
Bedminster township	Somerset	3	0	2	0	2	61.8%	1
Bernards township	Somerset	3	10	0	35	45	61.8%	28
Bernardsville borough	Somerset	3	0	4	0	4	61.8%	2
Bound Brook borough	Somerset	3	0	129	17	146	61.8%	90
Branchburg township	Somerset	3	0	2	9	11	61.8%	7
Bridgewater township	Somerset	3	7	53	119	179	61.8%	111
Far Hills borough	Somerset	3	0	3	0	3	61.8%	2
Franklin township	Somerset	3	0	86	54	140	61.8%	87
Green Brook township	Somerset	3	14	0	0	14	61.8%	9
Hillsborough township	Somerset	3	15	10	54	79	61.8%	49
Manville borough	Somerset	3	94	81	58	233	61.8%	144
Millstone borough	Somerset	3	0	0	0	0	61.8%	0
Montgomery township	Somerset	3	56	2	36	94	61.8%	58
North Plainfield borough	Somerset	3	58	362	72	492	61.8%	304
Peapack & Gladstone bor.	Somerset	3	0	2	0	2	61.8%	1
Raritan borough	Somerset	3	29	16	20	65	61.8%	40
Rocky Hill borough	Somerset	3	0	0	2	2	61.8%	1
Somerville borough	Somerset	3	33	86	39	158	61.8%	98

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
South Bound Brook borough	Somerset	3	50	19	43	112	61.8%	69
Warren township	Somerset	3	0	17	58	75	61.8%	46
Watchung borough	Somerset	3	6	0	21	27	61.8%	17
East Windsor township	Mercer	4	18	22	50	90	70.7%	64
Ewing township	Mercer	4	26	103	29	158	70.7%	112
Hamilton township	Mercer	4	193	342	114	649	70.7%	459
Hightstown borough	Mercer	4	32	8	20	60	70.7%	42
Hopewell borough	Mercer	4	9	1	8	18	70.7%	13
Hopewell township	Mercer	4	0	0	0	0	70.7%	0
Lawrence township	Mercer	4	8	49	19	76	70.7%	54
Pennington borough	Mercer	4	29	8	42	79	70.7%	56
Princeton	Mercer	4	20	78	37	135	70.7%	95
Robbinsville township	Mercer	4	0	0	26	26	70.7%	18
Trenton city	Mercer	4	186	1,132	198	1,516	70.7%	1,072
West Windsor township	Mercer	4	63	28	67	158	70.7%	112
Aberdeen township	Monmouth	4	53	21	34	108	65.0%	70
Allenhurst borough	Monmouth	4	0	3	1	4	65.0%	3
Allentown borough	Monmouth	4	5	0	6	11	65.0%	7
Asbury Park city	Monmouth	4	60	333	38	431	65.0%	280
Atlantic Highlands borough	Monmouth	4	54	0	29	83	65.0%	54
Avon-by-the-Sea borough	Monmouth	4	0	4	0	4	65.0%	3
Belmar borough	Monmouth	4	22	41	19	82	65.0%	53
Bradley Beach borough	Monmouth	4	0	4	22	26	65.0%	17
Brielle borough	Monmouth	4	7	0	5	12	65.0%	8
Colts Neck township	Monmouth	4	0	1	14	15	65.0%	10
Deal borough	Monmouth	4	2	1	0	3	65.0%	2
Eatontown borough	Monmouth	4	71	26	46	143	65.0%	93
Englishtown borough	Monmouth	4	0	0	40	40	65.0%	26
Fair Haven borough	Monmouth	4	0	0	0	0	65.0%	0
Farmingdale borough	Monmouth	4	0	5	0	5	65.0%	3
Freehold borough	Monmouth	4	50	222	81	353	65.0%	229
Freehold township	Monmouth	4	46	2	59	107	65.0%	70
Hazlet township	Monmouth	4	10	13	12	35	65.0%	23
Highlands borough	Monmouth	4	0	76	0	76	65.0%	49
Holmdel township	Monmouth	4	0	0	44	44	65.0%	29
Howell township	Monmouth	4	30	56	24	110	65.0%	71
Interlaken borough	Monmouth	4	2	0	1	3	65.0%	2
Keansburg borough	Monmouth	4	32	82	51	165	65.0%	107
Keyport borough	Monmouth	4	0	28	0	28	65.0%	18
Lake Como borough	Monmouth	4	0	11	0	11	65.0%	7
Little Silver borough	Monmouth	4	0	0	8	8	65.0%	5
Loch Arbour village	Monmouth	4	0	0	0	0	65.0%	0
Long Branch city	Monmouth	4	38	364	70	472	65.0%	307



Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Manalapan township	Monmouth	4	59	2	64	125	65.0%	81
Manasquan borough	Monmouth	4	0	0	11	11	65.0%	7
Marlboro township	Monmouth	4	52	0	78	130	65.0%	84
Matawan borough	Monmouth	4	27	40	18	85	65.0%	55
Middletown township	Monmouth	4	49	75	118	242	65.0%	157
Millstone township	Monmouth	4	0	0	32	32	65.0%	21
Monmouth Beach borough	Monmouth	4	0	0	0	0	65.0%	0
Neptune township	Monmouth	4	56	50	54	160	65.0%	104
Neptune City borough	Monmouth	4	16	2	0	18	65.0%	12
Ocean township	Monmouth	4	27	62	22	111	65.0%	72
Oceanport borough	Monmouth	4	0	0	0	0	65.0%	0
Red Bank borough	Monmouth	4	0	180	0	180	65.0%	117
Roosevelt borough	Monmouth	4	0	8	0	8	65.0%	5
Rumson borough	Monmouth	4	0	15	15	30	65.0%	19
Sea Bright borough	Monmouth	4	8	8	5	21	65.0%	14
Sea Girt borough	Monmouth	4	0	0	0	0	65.0%	0
Shrewsbury borough	Monmouth	4	11	0	0	11	65.0%	7
Shrewsbury township	Monmouth	4	0	6	21	27	65.0%	18
Spring Lake borough	Monmouth	4	0	0	32	32	65.0%	21
Spring Lake Heights bor.	Monmouth	4	0	11	13	24	65.0%	16
Tinton Falls borough	Monmouth	4	20	6	88	114	65.0%	74
Union Beach borough	Monmouth	4	0	60	12	72	65.0%	47
Upper Freehold township	Monmouth	4	27	8	18	53	65.0%	34
Wall township	Monmouth	4	0	36	99	135	65.0%	88
West Long Branch borough	Monmouth	4	0	15	0	15	65.0%	10
Barnegat township	Ocean	4	16	33	10	59	77.2%	46
Barnegat Light borough	Ocean	4	12	0	2	14	77.2%	11
Bay Head borough	Ocean	4	0	0	2	2	77.2%	2
Beach Haven borough	Ocean	4	0	2	0	2	77.2%	2
Beachwood borough	Ocean	4	0	10	0	10	77.2%	8
Berkeley township	Ocean	4	57	10	42	109	77.2%	84
Brick township	Ocean	4	75	78	178	331	77.2%	255
Eagleswood township	Ocean	4	0	0	0	0	77.2%	0
Harvey Cedars borough	Ocean	4	1	0	1	2	77.2%	2
Island Heights borough	Ocean	4	0	1	2	3	77.2%	2
Jackson township	Ocean	4	12	18	40	70	77.2%	54
Lacey township	Ocean	4	35	18	29	82	77.2%	63
Lakehurst borough	Ocean	4	0	18	2	20	77.2%	15
Lakewood township	Ocean	4	123	387	168	678	77.2%	523
Lavallette borough	Ocean	4	0	0	0	0	77.2%	0
Little Egg Harbor township	Ocean	4	120	29	28	177	77.2%	137
Long Beach township	Ocean	4	0	0	15	15	77.2%	12
Manchester township	Ocean	4	100	2	56	158	77.2%	122

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Mantoloking borough	Ocean	4	0	0	0	0	77.2%	0
Ocean township	Ocean	4	0	0	9	9	77.2%	7
Ocean Gate borough	Ocean	4	0	5	8	13	77.2%	10
Pine Beach borough	Ocean	4	0	0	3	3	77.2%	2
Plumsted township	Ocean	4	0	17	0	17	77.2%	13
Point Pleasant borough	Ocean	4	0	16	0	16	77.2%	12
Point Pleasant Beach bor.	Ocean	4	0	53	0	53	77.2%	41
Seaside Heights borough	Ocean	4	50	67	33	150	77.2%	116
Seaside Park borough	Ocean	4	17	0	15	32	77.2%	25
Ship Bottom borough	Ocean	4	0	3	0	3	77.2%	2
South Toms River borough	Ocean	4	0	29	0	29	77.2%	22
Stafford township	Ocean	4	91	20	46	157	77.2%	121
Surf City borough	Ocean	4	0	4	0	4	77.2%	3
Toms River township	Ocean	4	99	84	131	314	77.2%	242
Tuckerton borough	Ocean	4	0	32	0	32	77.2%	25
Bass River township	Burlington	5	5	1	0	6	42.0%	3
Beverly city	Burlington	5	0	6	0	6	42.0%	3
Bordentown city	Burlington	5	40	0	20	60	42.0%	25
Bordentown township	Burlington	5	0	6	10	16	42.0%	7
Burlington city	Burlington	5	0	63	2	65	42.0%	27
Burlington township	Burlington	5	21	56	8	85	42.0%	36
Chesterfield township	Burlington	5	24	0	12	36	42.0%	15
Cinnaminson township	Burlington	5	5	15	0	20	42.0%	8
Delanco township	Burlington	5	0	4	0	4	42.0%	2
Delran township	Burlington	5	10	34	4	48	42.0%	20
Eastampton township	Burlington	5	0	0	0	0	42.0%	0
Edgewater Park township	Burlington	5	46	8	18	72	42.0%	30
Evesham township	Burlington	5	82	16	45	143	42.0%	60
Fieldsboro borough	Burlington	5	0	0	0	0	42.0%	0
Florence township	Burlington	5	81	28	38	147	42.0%	62
Hainesport township	Burlington	5	0	3	0	3	42.0%	1
Lumberton township	Burlington	5	0	10	5	15	42.0%	6
Mansfield township	Burlington	5	0	0	0	0	42.0%	0
Maple Shade township	Burlington	5	0	58	0	58	42.0%	24
Medford township	Burlington	5	12	1	21	34	42.0%	14
Medford Lakes borough	Burlington	5	0	0	0	0	42.0%	0
Moorestown township	Burlington	5	10	12	36	58	42.0%	24
Mount Holly township	Burlington	5	0	62	0	62	42.0%	26
Mount Laurel township	Burlington	5	40	35	29	104	42.0%	44
New Hanover township	Burlington	5	0	0	0	0	42.0%	0
North Hanover township	Burlington	5	0	2	0	2	42.0%	1
Palmyra borough	Burlington	5	0	17	3	20	42.0%	8
Pemberton borough	Burlington	5	0	6	0	6	42.0%	3

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Pemberton township	Burlington	5	11	29	14	54	42.0%	23
Riverside township	Burlington	5	14	37	10	61	42.0%	26
Riverton borough	Burlington	5	0	0	0	0	42.0%	0
Shamong township	Burlington	5	37	0	10	47	42.0%	20
Southampton township	Burlington	5	34	0	14	48	42.0%	20
Springfield township	Burlington	5	5	1	2	8	42.0%	3
Tabernacle township	Burlington	5	0	2	0	2	42.0%	1
Washington township	Burlington	5	2	0	0	2	42.0%	1
Westampton township	Burlington	5	31	1	12	44	42.0%	18
Willingboro township	Burlington	5	72	52	39	163	42.0%	69
Woodland township	Burlington	5	4	3	0	7	42.0%	3
Wrightstown borough	Burlington	5	4	1	2	7	42.0%	3
Audubon borough	Camden	5	33	10	27	70	69.9%	49
Audubon Park borough	Camden	5	0	0	0	0	69.9%	0
Barrington borough	Camden	5	0	12	10	22	69.9%	15
Bellmawr borough	Camden	5	0	49	0	49	69.9%	34
Berlin borough	Camden	5	0	0	55	55	69.9%	38
Berlin township	Camden	5	23	27	0	50	69.9%	35
Brooklawn borough	Camden	5	0	4	0	4	69.9%	3
Camden city	Camden	5	162	692	278	1,132	69.9%	791
Cherry Hill township	Camden	5	12	95	294	401	69.9%	280
Chesilhurst borough	Camden	5	0	10	0	10	69.9%	7
Clementon borough	Camden	5	0	67	9	76	69.9%	53
Collingswood borough	Camden	5	9	17	55	81	69.9%	57
Gibbsboro borough	Camden	5	26	0	7	33	69.9%	23
Gloucester township	Camden	5	56	52	50	158	69.9%	110
Gloucester City	Camden	5	16	94	3	113	69.9%	79
Haddon township	Camden	5	18	18	26	62	69.9%	43
Haddonfield borough	Camden	5	13	7	0	20	69.9%	14
Haddon Heights borough	Camden	5	0	0	28	28	69.9%	20
Hi-Nella borough	Camden	5	0	8	0	8	69.9%	6
Laurel Springs borough	Camden	5	0	5	0	5	69.9%	3
Lawnside borough	Camden	5	0	1	0	1	69.9%	1
Lindenwold borough	Camden	5	55	65	76	196	69.9%	137
Magnolia borough	Camden	5	4	17	0	21	69.9%	15
Merchantville borough	Camden	5	0	1	0	1	69.9%	1
Mount Ephraim borough	Camden	5	0	0	3	3	69.9%	2
Oaklyn borough	Camden	5	8	3	7	18	69.9%	13
Pennsauken township	Camden	5	0	169	76	245	69.9%	171
Pine Hill borough	Camden	5	19	6	0	25	69.9%	17
Pine Valley borough	Camden	5	0	0	0	0	69.9%	0
Runnemede borough	Camden	5	0	41	0	41	69.9%	29
Somerdale borough	Camden	5	0	0	0	0	69.9%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Stratford borough	Camden	5	0	15	10	25	69.9%	17
Tavistock borough	Camden	5	0	0	0	0	69.9%	0
Voorhees township	Camden	5	0	6	281	287	69.9%	200
Waterford township	Camden	5	0	6	0	6	69.9%	4
Winslow township	Camden	5	21	7	52	80	69.9%	56
Woodlynne borough	Camden	5	0	21	12	33	69.9%	23
Clayton borough	Gloucester	5	39	5	21	65	68.5%	45
Deptford township	Gloucester	5	26	23	52	101	68.5%	69
East Greenwich township	Gloucester	5	0	60	0	60	68.5%	41
Elk township	Gloucester	5	0	1	7	8	68.5%	5
Franklin township	Gloucester	5	5	64	0	69	68.5%	47
Glassboro borough	Gloucester	5	0	24	5	29	68.5%	20
Greenwich township	Gloucester	5	0	0	0	0	68.5%	0
Harrison township	Gloucester	5	0	1	0	1	68.5%	1
Logan township	Gloucester	5	0	0	0	0	68.5%	0
Mantua township	Gloucester	5	41	0	22	63	68.5%	43
Monroe township	Gloucester	5	51	10	51	112	68.5%	77
National Park borough	Gloucester	5	6	0	3	9	68.5%	6
Newfield borough	Gloucester	5	0	5	0	5	68.5%	3
Paulsboro borough	Gloucester	5	0	99	10	109	68.5%	75
Pitman borough	Gloucester	5	0	9	38	47	68.5%	32
South Harrison township	Gloucester	5	0	0	0	0	68.5%	0
Swedesboro borough	Gloucester	5	0	26	0	26	68.5%	18
Washington township	Gloucester	5	72	10	114	196	68.5%	134
Wenonah borough	Gloucester	5	0	0	0	0	68.5%	0
West Deptford township	Gloucester	5	5	24	3	32	68.5%	22
Westville borough	Gloucester	5	0	14	0	14	68.5%	10
Woodbury city	Gloucester	5	0	16	25	41	68.5%	28
Woodbury Heights borough	Gloucester	5	6	6	0	12	68.5%	8
Woolwich township	Gloucester	5	0	0	0	0	68.5%	0
Absecon city	Atlantic	6	31	15	14	60	65.4%	39
Atlantic City	Atlantic	6	116	688	48	852	65.4%	557
Brigantine city	Atlantic	6	22	11	8	41	65.4%	27
Buena borough	Atlantic	6	8	6	3	17	65.4%	11
Buena Vista township	Atlantic	6	47	8	17	72	65.4%	47
Corbin City	Atlantic	6	0	0	1	1	65.4%	1
Egg Harbor township	Atlantic	6	88	6	31	125	65.4%	82
Egg Harbor City	Atlantic	6	14	44	5	63	65.4%	41
Estell Manor city	Atlantic	6	0	0	0	0	65.4%	0
Folsom borough	Atlantic	6	0	3	0	3	65.4%	2
Galloway township	Atlantic	6	124	18	50	192	65.4%	125
Hamilton township	Atlantic	6	27	91	12	130	65.4%	85
Hammonton town	Atlantic	6	104	98	48	250	65.4%	163

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Linwood city	Atlantic	6	6	5	11	22	65.4%	14
Longport borough	Atlantic	6	4	0	0	4	65.4%	3
Margate City	Atlantic	6	31	9	11	51	65.4%	33
Mullica township	Atlantic	6	0	3	0	3	65.4%	2
Northfield city	Atlantic	6	0	8	1	9	65.4%	6
Pleasantville city	Atlantic	6	56	196	35	287	65.4%	188
Port Republic city	Atlantic	6	0	0	0	0	65.4%	0
Somers Point city	Atlantic	6	4	19	3	26	65.4%	17
Ventnor City	Atlantic	6	12	33	17	62	65.4%	41
Weymouth township	Atlantic	6	7	0	1	8	65.4%	5
Avalon borough	Cape May	6	0	0	0	0	34.4%	0
Cape May city	Cape May	6	0	12	0	12	34.4%	4
Cape May Point borough	Cape May	6	0	0	0	0	34.4%	0
Dennis township	Cape May	6	35	2	82	119	34.4%	41
Lower township	Cape May	6	13	36	70	119	34.4%	41
Middle township	Cape May	6	0	2	124	126	34.4%	43
North Wildwood city	Cape May	6	0	40	0	40	34.4%	14
Ocean City	Cape May	6	42	38	101	181	34.4%	62
Sea Isle City	Cape May	6	0	0	3	3	34.4%	1
Stone Harbor borough	Cape May	6	0	0	0	0	34.4%	0
Upper township	Cape May	6	0	14	14	28	34.4%	10
West Cape May borough	Cape May	6	3	1	2	6	34.4%	2
West Wildwood borough	Cape May	6	3	0	2	5	34.4%	2
Wildwood city	Cape May	6	0	94	0	94	34.4%	32
Wildwood Crest borough	Cape May	6	26	4	30	60	34.4%	21
Woodbine borough	Cape May	6	0	7	0	7	34.4%	2
Bridgeton city	Cumberland	6	53	344	91	488	57.7%	281
Commercial township	Cumberland	6	0	2	11	13	57.7%	7
Deerfield township	Cumberland	6	0	3	0	3	57.7%	2
Downe township	Cumberland	6	15	0	0	15	57.7%	9
Fairfield township	Cumberland	6	13	15	14	42	57.7%	24
Greenwich township	Cumberland	6	0	0	10	10	57.7%	6
Hopewell township	Cumberland	6	0	0	0	0	57.7%	0
Lawrence township	Cumberland	6	6	0	4	10	57.7%	6
Maurice River township	Cumberland	6	0	8	0	8	57.7%	5
Millville city	Cumberland	6	22	142	34	198	57.7%	114
Shiloh borough	Cumberland	6	0	3	0	3	57.7%	2
Stow Creek township	Cumberland	6	0	1	0	1	57.7%	1
Upper Deerfield township	Cumberland	6	12	21	0	33	57.7%	19
Vineland city	Cumberland	6	9	392	103	504	57.7%	291
Alloway township	Salem	6	0	0	0	0	43.8%	0
Carneys Point township	Salem	6	0	26	36	62	43.8%	27
Elmer borough	Salem	6	0	0	0	0	43.8%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Elsinboro township	Salem	6	0	8	5	13	43.8%	6
Lower Alloways Creek twp	Salem	6	0	8	0	8	43.8%	4
Mannington township	Salem	6	0	4	2	6	43.8%	3
Oldmans township	Salem	6	0	0	0	0	43.8%	0
Penns Grove borough	Salem	6	69	41	16	126	43.8%	55
Pennsville township	Salem	6	0	34	26	60	43.8%	26
Pilesgrove township	Salem	6	0	0	44	44	43.8%	19
Pittsgrove township	Salem	6	27	2	21	50	43.8%	22
Quinton township	Salem	6	0	0	0	0	43.8%	0
Salem city	Salem	6	20	25	5	50	43.8%	22
Upper Pittsgrove township	Salem	6	0	13	0	13	43.8%	6
Woodstown borough	Salem	6	0	3	0	3	43.8%	1

TABLE A.2: PRESENT NEED BY MUNICIPALITY

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Allendale borough	Bergen	1	11	0.7	14
Alpine borough	Bergen	1	2	0.1	2
Bergenfield borough	Bergen	1	140	0.4	141
Bogota borough	Bergen	1	63	0.5	65
Carlstadt borough	Bergen	1	28	1.1	32
Cliffside Park borough	Bergen	1	145	(3.5)	131
Closter borough	Bergen	1	0	(1.6)	0
Cresskill borough	Bergen	1	35	1.4	40
Demarest borough	Bergen	1	0	(0.4)	0
Dumont borough	Bergen	1	33	0.8	36
East Rutherford borough	Bergen	1	151	6.0	175
Edgewater borough	Bergen	1	2	(2.9)	0
Elmwood Park borough	Bergen	1	59	(4.8)	40
Emerson borough	Bergen	1	39	3.5	53
Englewood city	Bergen	1	319	8.7	354
Englewood Cliffs borough	Bergen	1	1	(0.4)	0
Fair Lawn borough	Bergen	1	127	7.6	158
Fairview borough	Bergen	1	239	(7.4)	210
Fort Lee borough	Bergen	1	222	6.5	248
Franklin Lakes borough	Bergen	1	23	1.8	30
Garfield city	Bergen	1	155	(8.8)	120
Glen Rock borough	Bergen	1	12	0.4	13
Hackensack city	Bergen	1	462	5.3	483
Harrington Park borough	Bergen	1	4	0.1	4
Hasbrouck Heights borough	Bergen	1	57	1.6	64
Haworth borough	Bergen	1	0	(0.4)	0
Hillsdale borough	Bergen	1	12	0.2	13
Ho-Ho-Kus borough	Bergen	1	7	0.6	10
Leonia borough	Bergen	1	69	0.5	71
Little Ferry borough	Bergen	1	119	4.9	139
Lodi borough	Bergen	1	160	(0.2)	159
Lyndhurst township	Bergen	1	160	11.0	204
Mahwah township	Bergen	1	55	2.3	64
Maywood borough	Bergen	1	24	0.3	25
Midland Park borough	Bergen	1	20	0.7	23
Montvale borough	Bergen	1	4	(0.5)	2
Moonachie borough	Bergen	1	22	1.5	28
New Milford borough	Bergen	1	42	(1.5)	36
North Arlington borough	Bergen	1	124	7.7	155

¹⁰⁵ As described in section 3.5, four years of annualized net change are applied to the 2009-2013 ACS calculation to extrapolate from its midpoint in 2011 to 2015.

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Northvale borough	Bergen	1	5	(0.5)	3
Norwood borough	Bergen	1	2	(1.3)	0
Oakland borough	Bergen	1	21	0.7	24
Old Tappan borough	Bergen	1	9	(0.1)	9
Oradell borough	Bergen	1	11	0.7	14
Palisades Park borough	Bergen	1	139	(3.5)	125
Paramus borough	Bergen	1	108	6.2	133
Park Ridge borough	Bergen	1	87	5.4	108
Ramsey borough	Bergen	1	40	2.5	50
Ridgefield borough	Bergen	1	113	5.1	133
Ridgefield Park village	Bergen	1	133	2.5	143
Ridgewood village	Bergen	1	19	(3.6)	4
River Edge borough	Bergen	1	36	0.8	39
River Vale township	Bergen	1	14	1.3	19
Rochelle Park township	Bergen	1	0	(2.1)	0
Rockleigh borough	Bergen	1	0	(0.2)	0
Rutherford borough	Bergen	1	135	6.0	159
Saddle Brook township	Bergen	1	35	0.2	36
Saddle River borough	Bergen	1	34	2.2	43
South Hackensack township	Bergen	1	45	2.5	55
Teaneck township	Bergen	1	116	(9.2)	79
Tenafly borough	Bergen	1	28	(1.6)	21
Teterboro borough	Bergen	1	0	0.0	0
Upper Saddle River borough	Bergen	1	5	0.5	7
Waldwick borough	Bergen	1	47	2.8	58
Wallington borough	Bergen	1	81	1.0	85
Washington township	Bergen	1	0	0.0	0
Westwood borough	Bergen	1	45	1.2	50
Woodcliff Lake borough	Bergen	1	12	1.1	16
Wood-Ridge borough	Bergen	1	0	(3.7)	0
Wyckoff township	Bergen	1	29	0.5	31
Bayonne city	Hudson	1	747	24.5	845
East Newark borough	Hudson	1	15	(1.7)	8
Guttenberg town	Hudson	1	64	(1.7)	57
Harrison town	Hudson	1	240	2.1	248
Hoboken city	Hudson	1	318	(3.7)	303
Jersey City	Hudson	1	4,384	(3.1)	4,372
Kearny town	Hudson	1	269	(10.5)	227
North Bergen township	Hudson	1	813	(5.0)	793
Secaucus town	Hudson	1	57	(0.7)	54
Union City	Hudson	1	1,868	(36.5)	1,722
Weehawken township	Hudson	1	198	(1.6)	191
West New York town	Hudson	1	945	(43.6)	770
Bloomington borough	Passaic	1	46	2.7	57

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Clifton city	Passaic	1	1,742	97.5	2,132
Haledon borough	Passaic	1	82	0.9	86
Hawthorne borough	Passaic	1	84	4.7	103
Little Falls township	Passaic	1	116	9.1	152
North Haledon borough	Passaic	1	0	0.0	0
Passaic city	Passaic	1	4,921	254.7	5,940
Paterson city	Passaic	1	3,830	71.9	4,118
Pompton Lakes borough	Passaic	1	49	1.7	56
Prospect Park borough	Passaic	1	46	(1.5)	40
Ringwood borough	Passaic	1	16	(1.2)	11
Totowa borough	Passaic	1	109	7.1	137
Wanaque borough	Passaic	1	62	3.1	74
Wayne township	Passaic	1	220	13.1	272
West Milford township	Passaic	1	73	1.3	78
Woodland Park borough	Passaic	1	185	15.2	246
Andover borough	Sussex	1	0	0.0	0
Andover township	Sussex	1	5	0.5	7
Branchville borough	Sussex	1	1	0.1	1
Byram township	Sussex	1	24	1.1	28
Frankford township	Sussex	1	24	1.8	31
Franklin borough	Sussex	1	19	0.5	21
Fredon township	Sussex	1	17	1.5	23
Green township	Sussex	1	0	(0.3)	0
Hamburg borough	Sussex	1	10	0.5	12
Hampton township	Sussex	1	6	0.5	8
Hardyston township	Sussex	1	16	1.1	20
Hopatcong borough	Sussex	1	44	2.7	55
Lafayette township	Sussex	1	0	(0.2)	0
Montague township	Sussex	1	0	(0.6)	0
Newton town	Sussex	1	132	10.1	172
Ogdensburg borough	Sussex	1	5	0.1	5
Sandyston township	Sussex	1	5	0.3	6
Sparta township	Sussex	1	26	1.6	33
Stanhope borough	Sussex	1	5	0.3	6
Stillwater township	Sussex	1	0	(0.8)	0
Sussex borough	Sussex	1	9	(1.1)	5
Vernon township	Sussex	1	35	1.9	43
Walpack township	Sussex	1	0	0.0	0
Wantage township	Sussex	1	4	0.4	5
Belleville township	Essex	2	901	51.9	1,109
Bloomfield township	Essex	2	504	14.7	563
Caldwell borough	Essex	2	21	(1.7)	14
Cedar Grove township	Essex	2	16	(0.4)	15
City of Orange township	Essex	2	979	35.7	1,122

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
East Orange city	Essex	2	663	(47.8)	472
Essex Fells borough	Essex	2	0	(0.4)	0
Fairfield township	Essex	2	33	3.0	45
Glen Ridge borough	Essex	2	23	0.2	24
Irvington township	Essex	2	925	(8.9)	889
Livingston township	Essex	2	21	(1.7)	14
Maplewood township	Essex	2	107	(0.2)	106
Millburn township	Essex	2	110	6.7	137
Montclair township	Essex	2	118	(19.2)	41
Newark city	Essex	2	3,866	(73.7)	3,571
North Caldwell borough	Essex	2	25	2.3	34
Nutley township	Essex	2	304	22.1	392
Roseland borough	Essex	2	0	(0.5)	0
S. Orange Village township	Essex	2	5	(3.9)	0
Verona township	Essex	2	13	(3.9)	0
West Caldwell township	Essex	2	35	2.8	46
West Orange township	Essex	2	335	4.7	354
Boonton town	Morris	2	38	0.6	41
Boonton township	Morris	2	17	1.5	23
Butler borough	Morris	2	29	0.9	33
Chatham borough	Morris	2	0	(1.0)	0
Chatham township	Morris	2	44	3.1	56
Chester borough	Morris	2	10	0.4	11
Chester township	Morris	2	21	1.7	28
Denville township	Morris	2	36	1.9	44
Dover town	Morris	2	255	7.7	286
East Hanover township	Morris	2	26	2.4	35
Florham Park borough	Morris	2	59	2.4	68
Hanover township	Morris	2	23	1.2	28
Harding township	Morris	2	0	0.0	0
Jefferson township	Morris	2	50	3.9	66
Kinnelon borough	Morris	2	2	(0.5)	0
Lincoln Park borough	Morris	2	12	(0.5)	10
Long Hill township	Morris	2	10	0.9	14
Madison borough	Morris	2	16	(2.7)	5
Mendham borough	Morris	2	8	0.5	10
Mendham township	Morris	2	17	1.5	23
Mine Hill township	Morris	2	3	(1.3)	0
Montville township	Morris	2	14	0.7	17
Morris township	Morris	2	26	0.5	28
Morris Plains borough	Morris	2	24	2.0	32
Morristown town	Morris	2	143	(0.6)	140
Mountain Lakes borough	Morris	2	1	0.1	1
Mount Arlington borough	Morris	2	12	0.4	13



Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Mount Olive township	Morris	2	110	6.7	137
Netcong borough	Morris	2	16	1.0	20
Parsippany-Troy Hills twp	Morris	2	176	0.3	177
Pequanock township	Morris	2	56	5.1	76
Randolph township	Morris	2	27	0.8	30
Riverdale borough	Morris	2	2	0.0	2
Rockaway borough	Morris	2	14	0.6	17
Rockaway township	Morris	2	24	0.3	25
Roxbury township	Morris	2	23	0.5	25
Victory Gardens borough	Morris	2	13	0.1	13
Washington township	Morris	2	8	0.5	10
Wharton borough	Morris	2	79	5.8	102
Berkeley Heights township	Union	2	13	(1.1)	9
Clark township	Union	2	29	1.9	37
Cranford township	Union	2	85	3.3	98
Elizabeth city	Union	2	4,925	204.4	5,742
Fanwood borough	Union	2	17	0.0	17
Garwood borough	Union	2	32	2.0	40
Hillside township	Union	2	250	7.7	281
Kenilworth borough	Union	2	2	(2.3)	0
Linden city	Union	2	402	16.9	470
Mountainside borough	Union	2	106	7.9	138
New Providence borough	Union	2	51	2.9	63
Plainfield city	Union	2	946	3.3	959
Rahway city	Union	2	148	(8.3)	115
Roselle borough	Union	2	242	5.8	265
Roselle Park borough	Union	2	90	(2.2)	81
Scotch Plains township	Union	2	79	5.5	101
Springfield township	Union	2	2	(1.3)	0
Summit city	Union	2	145	6.7	172
Union township	Union	2	349	15.2	410
Westfield town	Union	2	64	3.0	76
Winfield township	Union	2	21	0.4	22
Allamuchy township	Warren	2	41	3.5	55
Alpha borough	Warren	2	10	0.8	13
Belvidere town	Warren	2	6	(0.1)	6
Blairstown township	Warren	2	0	(1.3)	0
Franklin township	Warren	2	0	(0.6)	0
Frelinghuysen township	Warren	2	0	(0.4)	0
Greenwich township	Warren	2	0	(1.5)	0
Hackettstown town	Warren	2	115	5.0	135
Hardwick township	Warren	2	2	0.0	2
Harmony township	Warren	2	1	(0.2)	0
Hope township	Warren	2	4	(0.3)	3



Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Independence township	Warren	2	0	(1.5)	0
Knowlton township	Warren	2	12	(0.1)	12
Liberty township	Warren	2	0	(0.7)	0
Lopatcong township	Warren	2	0	(1.0)	0
Mansfield township	Warren	2	15	1.4	20
Oxford township	Warren	2	21	1.4	26
Phillipsburg town	Warren	2	155	7.3	184
Pohatcong township	Warren	2	6	0.5	8
Washington borough	Warren	2	16	(1.8)	9
Washington township	Warren	2	5	0.5	7
White township	Warren	2	44	4.0	60
Alexandria township	Hunterdon	3	27	1.9	35
Bethlehem township	Hunterdon	3	3	0.0	3
Bloomsbury borough	Hunterdon	3	2	0.2	3
Califon borough	Hunterdon	3	0	(0.2)	0
Clinton town	Hunterdon	3	14	1.3	19
Clinton township	Hunterdon	3	17	0.7	20
Delaware township	Hunterdon	3	17	1.2	22
East Amwell township	Hunterdon	3	2	(0.3)	1
Flemington borough	Hunterdon	3	59	4.5	77
Franklin township	Hunterdon	3	0	(1.0)	0
Frenchtown borough	Hunterdon	3	2	(0.2)	1
Glen Gardner borough	Hunterdon	3	7	0.4	8
Hampton borough	Hunterdon	3	12	1.0	16
High Bridge borough	Hunterdon	3	35	3.2	48
Holland township	Hunterdon	3	74	5.5	96
Kingwood township	Hunterdon	3	4	(0.2)	3
Lambertville city	Hunterdon	3	60	3.3	73
Lebanon borough	Hunterdon	3	3	0.1	3
Lebanon township	Hunterdon	3	2	(0.8)	0
Milford borough	Hunterdon	3	1	(0.2)	0
Raritan township	Hunterdon	3	27	1.6	34
Readington township	Hunterdon	3	95	8.6	130
Stockton borough	Hunterdon	3	0	(0.2)	0
Tewksbury township	Hunterdon	3	0	0.0	0
Union township	Hunterdon	3	1	(0.1)	1
West Amwell township	Hunterdon	3	0	(0.2)	0
Carteret borough	Middlesex	3	139	(5.5)	117
Cranbury township	Middlesex	3	4	(0.2)	3
Dunellen borough	Middlesex	3	9	(2.1)	1
East Brunswick township	Middlesex	3	77	3.2	90
Edison township	Middlesex	3	516	32.6	647
Helmetta borough	Middlesex	3	6	0.4	7
Highland Park borough	Middlesex	3	77	0.5	79

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Jamesburg borough	Middlesex	3	32	1.4	37
Metuchen borough	Middlesex	3	70	2.8	81
Middlesex borough	Middlesex	3	63	3.5	77
Milltown borough	Middlesex	3	31	1.9	39
Monroe township	Middlesex	3	97	2.3	106
New Brunswick city	Middlesex	3	1,345	48.5	1,539
North Brunswick township	Middlesex	3	180	10.7	223
Old Bridge township	Middlesex	3	187	5.7	210
Perth Amboy city	Middlesex	3	815	(16.8)	748
Piscataway township	Middlesex	3	267	12.5	317
Plainsboro township	Middlesex	3	13	(1.7)	6
Sayreville borough	Middlesex	3	134	3.9	150
South Amboy city	Middlesex	3	36	1.2	41
South Brunswick township	Middlesex	3	105	6.4	130
South Plainfield borough	Middlesex	3	67	(2.8)	56
South River borough	Middlesex	3	151	6.0	175
Spotswood borough	Middlesex	3	14	(0.5)	12
Woodbridge township	Middlesex	3	381	8.9	417
Bedminster township	Somerset	3	1	0.1	1
Bernards township	Somerset	3	28	1.5	34
Bernardsville borough	Somerset	3	2	(1.1)	0
Bound Brook borough	Somerset	3	90	(7.3)	61
Branchburg township	Somerset	3	7	(1.4)	2
Bridgewater township	Somerset	3	111	3.6	126
Far Hills borough	Somerset	3	2	0.0	2
Franklin township	Somerset	3	87	(5.2)	66
Green Brook township	Somerset	3	9	0.8	12
Hillsborough township	Somerset	3	49	3.2	62
Manville borough	Somerset	3	144	6.5	170
Millstone borough	Somerset	3	0	(0.2)	0
Montgomery township	Somerset	3	58	4.5	76
North Plainfield borough	Somerset	3	304	2.4	313
Peapack & Gladstone bor.	Somerset	3	1	(0.4)	0
Raritan borough	Somerset	3	40	0.4	41
Rocky Hill borough	Somerset	3	1	(0.2)	0
Somerville borough	Somerset	3	98	2.7	109
South Bound Brook borough	Somerset	3	69	(0.1)	69
Warren township	Somerset	3	46	3.3	59
Watchung borough	Somerset	3	17	0.5	19
East Windsor township	Mercer	4	64	0.4	65
Ewing township	Mercer	4	112	4.1	128
Hamilton township	Mercer	4	459	20.0	539
Hightstown borough	Mercer	4	42	0.2	43
Hopewell borough	Mercer	4	13	1.2	18

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Hopewell township	Mercer	4	0	(0.2)	0
Lawrence township	Mercer	4	54	1.5	60
Pennington borough	Mercer	4	56	5.1	76
Princeton	Mercer	4	95	(1.0)	91
Robbinsville township	Mercer	4	18	0.5	20
Trenton city	Mercer	4	1,072	(0.9)	1,068
West Windsor township	Mercer	4	112	8.5	146
Aberdeen township	Monmouth	4	70	4.0	86
Allenhurst borough	Monmouth	4	3	0.2	4
Allentown borough	Monmouth	4	7	0.1	7
Asbury Park city	Monmouth	4	280	(5.0)	260
Atlantic Highlands borough	Monmouth	4	54	4.4	71
Avon-by-the-Sea borough	Monmouth	4	3	(0.7)	0
Belmar borough	Monmouth	4	53	0.3	54
Bradley Beach borough	Monmouth	4	17	(1.0)	13
Brielle borough	Monmouth	4	8	0.7	11
Colts Neck township	Monmouth	4	10	0.9	14
Deal borough	Monmouth	4	2	0.1	2
Eatontown borough	Monmouth	4	93	5.7	116
Englishtown borough	Monmouth	4	26	(0.5)	24
Fair Haven borough	Monmouth	4	0	(0.3)	0
Farmingdale borough	Monmouth	4	3	(0.2)	2
Freehold borough	Monmouth	4	229	8.6	264
Freehold township	Monmouth	4	70	4.2	87
Hazlet township	Monmouth	4	23	(0.1)	23
Highlands borough	Monmouth	4	49	2.6	60
Holmdel township	Monmouth	4	29	1.3	34
Howell township	Monmouth	4	71	0.5	73
Interlaken borough	Monmouth	4	2	0.2	3
Keansburg borough	Monmouth	4	107	3.6	122
Keyport borough	Monmouth	4	18	(0.3)	17
Lake Como borough	Monmouth	4	7	(1.1)	3
Little Silver borough	Monmouth	4	5	0.5	7
Loch Arbour village	Monmouth	4	0	0.0	0
Long Branch city	Monmouth	4	307	1.1	311
Manalapan township	Monmouth	4	81	4.4	98
Manasquan borough	Monmouth	4	7	(1.9)	0
Marlboro township	Monmouth	4	84	4.9	104
Matawan borough	Monmouth	4	55	3.7	70
Middletown township	Monmouth	4	157	2.3	166
Millstone township	Monmouth	4	21	0.6	24
Monmouth Beach borough	Monmouth	4	0	(0.5)	0
Neptune township	Monmouth	4	104	(4.5)	86
Neptune City borough	Monmouth	4	12	0.3	13



Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Ocean township	Monmouth	4	72	2.2	81
Oceanport borough	Monmouth	4	0	0.0	0
Red Bank borough	Monmouth	4	117	3.5	131
Roosevelt borough	Monmouth	4	5	0.2	6
Rumson borough	Monmouth	4	19	1.7	26
Sea Bright borough	Monmouth	4	14	(0.8)	11
Sea Girt borough	Monmouth	4	0	(0.3)	0
Shrewsbury borough	Monmouth	4	7	0.6	10
Shrewsbury township	Monmouth	4	18	1.5	24
Spring Lake borough	Monmouth	4	21	(2.3)	12
Spring Lake Heights bor.	Monmouth	4	16	1.0	20
Tinton Falls borough	Monmouth	4	74	3.3	87
Union Beach borough	Monmouth	4	47	2.5	57
Upper Freehold township	Monmouth	4	34	2.5	44
Wall township	Monmouth	4	88	4.2	105
West Long Branch borough	Monmouth	4	10	0.9	14
Barnegat township	Ocean	4	46	4.2	63
Barnegat Light borough	Ocean	4	11	0.6	14
Bay Head borough	Ocean	4	2	(0.3)	1
Beach Haven borough	Ocean	4	2	0.2	3
Beachwood borough	Ocean	4	8	(1.1)	4
Berkeley township	Ocean	4	84	2.3	93
Brick township	Ocean	4	255	15.3	316
Eagleswood township	Ocean	4	0	(0.2)	0
Harvey Cedars borough	Ocean	4	2	0.2	3
Island Heights borough	Ocean	4	2	0.2	3
Jackson township	Ocean	4	54	0.5	56
Lacey township	Ocean	4	63	3.5	77
Lakehurst borough	Ocean	4	15	1.2	20
Lakewood township	Ocean	4	523	2.5	533
Lavallette borough	Ocean	4	0	0.0	0
Little Egg Harbor township	Ocean	4	137	12.5	187
Long Beach township	Ocean	4	12	1.1	16
Manchester township	Ocean	4	122	8.2	155
Mantoloking borough	Ocean	4	0	(0.1)	0
Ocean township	Ocean	4	7	(0.2)	6
Ocean Gate borough	Ocean	4	10	0.4	11
Pine Beach borough	Ocean	4	2	0.2	3
Plumsted township	Ocean	4	13	0.4	14
Point Pleasant borough	Ocean	4	12	(0.4)	11
Point Pleasant Beach bor.	Ocean	4	41	(1.3)	36
Seaside Heights borough	Ocean	4	116	8.7	151
Seaside Park borough	Ocean	4	25	1.4	30
Ship Bottom borough	Ocean	4	2	(0.5)	0

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
South Toms River borough	Ocean	4	22	1.7	29
Stafford township	Ocean	4	121	9.1	157
Surf City borough	Ocean	4	3	0.1	3
Toms River township	Ocean	4	242	13.5	296
Tuckerton borough	Ocean	4	25	1.8	32
Bass River township	Burlington	5	3	(0.9)	0
Beverly city	Burlington	5	3	(1.3)	0
Bordentown city	Burlington	5	25	1.8	32
Bordentown township	Burlington	5	7	(1.3)	2
Burlington city	Burlington	5	27	(3.3)	14
Burlington township	Burlington	5	36	(2.3)	27
Chesterfield township	Burlington	5	15	1.4	20
Cinnaminson township	Burlington	5	8	0.3	9
Delanco township	Burlington	5	2	(0.4)	1
Delran township	Burlington	5	20	(0.4)	19
Eastampton township	Burlington	5	0	(1.5)	0
Edgewater Park township	Burlington	5	30	1.6	37
Evesham township	Burlington	5	60	5.0	80
Fieldsboro borough	Burlington	5	0	(0.3)	0
Florence township	Burlington	5	62	2.5	72
Hainesport township	Burlington	5	1	(0.7)	0
Lumberton township	Burlington	5	6	(3.5)	0
Mansfield township	Burlington	5	0	(0.5)	0
Maple Shade township	Burlington	5	24	(1.7)	17
Medford township	Burlington	5	14	0.1	14
Medford Lakes borough	Burlington	5	0	0.0	0
Moorestown township	Burlington	5	24	0.6	27
Mount Holly township	Burlington	5	26	(3.4)	13
Mount Laurel township	Burlington	5	44	1.5	50
New Hanover township	Burlington	5	0	(0.8)	0
North Hanover township	Burlington	5	1	(1.4)	0
Palmyra borough	Burlington	5	8	(0.9)	4
Pemberton borough	Burlington	5	3	(0.9)	0
Pemberton township	Burlington	5	23	(5.0)	3
Riverside township	Burlington	5	26	(1.3)	21
Riverton borough	Burlington	5	0	(1.5)	0
Shamong township	Burlington	5	20	1.2	25
Southampton township	Burlington	5	20	1.4	25
Springfield township	Burlington	5	3	0.0	3
Tabernacle township	Burlington	5	1	(0.7)	0
Washington township	Burlington	5	1	0.1	1
Westampton township	Burlington	5	18	0.5	20
Willingboro township	Burlington	5	69	2.2	78
Woodland township	Burlington	5	3	(0.3)	2

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Wrightstown borough	Burlington	5	3	(0.1)	3
Audubon borough	Camden	5	49	3.0	61
Audubon Park borough	Camden	5	0	(0.5)	0
Barrington borough	Camden	5	15	1.2	20
Bellmawr borough	Camden	5	34	(0.8)	31
Berlin borough	Camden	5	38	1.4	43
Berlin township	Camden	5	35	2.8	46
Brooklawn borough	Camden	5	3	(0.5)	1
Camden city	Camden	5	791	(81.7)	464
Cherry Hill township	Camden	5	280	11.4	325
Chesilhurst borough	Camden	5	7	0.5	9
Clementon borough	Camden	5	53	1.9	61
Collingswood borough	Camden	5	57	(1.5)	51
Gibbsboro borough	Camden	5	23	0.5	25
Gloucester township	Camden	5	110	1.8	117
Gloucester City	Camden	5	79	1.8	86
Haddon township	Camden	5	43	0.6	46
Haddonfield borough	Camden	5	14	(1.0)	10
Haddon Heights borough	Camden	5	20	(0.3)	19
Hi-Nella borough	Camden	5	6	0.2	7
Laurel Springs borough	Camden	5	3	(0.2)	2
Lawnside borough	Camden	5	1	(1.3)	0
Lindenwold borough	Camden	5	137	6.5	163
Magnolia borough	Camden	5	15	0.6	18
Merchantville borough	Camden	5	1	(1.3)	0
Mount Ephraim borough	Camden	5	2	(0.4)	1
Oaklyn borough	Camden	5	13	(0.1)	13
Pennsauken township	Camden	5	171	(1.1)	167
Pine Hill borough	Camden	5	17	(1.5)	11
Pine Valley borough	Camden	5	0	0.0	0
Runnemede borough	Camden	5	29	1.0	33
Somerdale borough	Camden	5	0	(1.3)	0
Stratford borough	Camden	5	17	(0.5)	15
Tavistock borough	Camden	5	0	0.0	0
Voorhees township	Camden	5	200	9.8	239
Waterford township	Camden	5	4	(2.9)	0
Winslow township	Camden	5	56	(1.4)	51
Woodlynne borough	Camden	5	23	(0.6)	20
Clayton borough	Gloucester	5	45	(0.3)	44
Deptford township	Gloucester	5	69	4.5	87
East Greenwich township	Gloucester	5	41	2.8	52
Elk township	Gloucester	5	5	(0.2)	4
Franklin township	Gloucester	5	47	0.9	51
Glassboro borough	Gloucester	5	20	(1.8)	13

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Greenwich township	Gloucester	5	0	(1.3)	0
Harrison township	Gloucester	5	1	(0.8)	0
Logan township	Gloucester	5	0	0.0	0
Mantua township	Gloucester	5	43	3.2	56
Monroe township	Gloucester	5	77	3.3	90
National Park borough	Gloucester	5	6	0.0	6
Newfield borough	Gloucester	5	3	0.1	3
Paulsboro borough	Gloucester	5	75	4.2	92
Pitman borough	Gloucester	5	32	1.0	36
South Harrison township	Gloucester	5	0	(0.5)	0
Swedesboro borough	Gloucester	5	18	1.0	22
Washington township	Gloucester	5	134	9.6	173
Wenonah borough	Gloucester	5	0	0.0	0
West Deptford township	Gloucester	5	22	(1.8)	15
Westville borough	Gloucester	5	10	(2.5)	0
Woodbury city	Gloucester	5	28	(3.0)	16
Woodbury Heights borough	Gloucester	5	8	0.0	8
Woolwich township	Gloucester	5	0	(0.3)	0
Absecon city	Atlantic	6	39	1.5	45
Atlantic City	Atlantic	6	557	(1.6)	550
Brigantine city	Atlantic	6	27	1.8	34
Buena borough	Atlantic	6	11	(1.4)	6
Buena Vista township	Atlantic	6	47	3.3	60
Corbin City	Atlantic	6	1	0.0	1
Egg Harbor township	Atlantic	6	82	1.6	89
Egg Harbor City	Atlantic	6	41	1.0	45
Estell Manor city	Atlantic	6	0	(0.5)	0
Folsom borough	Atlantic	6	2	(0.2)	1
Galloway township	Atlantic	6	125	8.5	159
Hamilton township	Atlantic	6	85	4.4	102
Hammonton town	Atlantic	6	163	8.8	198
Linwood city	Atlantic	6	14	(2.5)	4
Longport borough	Atlantic	6	3	0.1	3
Margate City	Atlantic	6	33	2.8	44
Mullica township	Atlantic	6	2	(1.7)	0
Northfield city	Atlantic	6	6	(0.4)	5
Pleasantville city	Atlantic	6	188	10.4	229
Port Republic city	Atlantic	6	0	0.0	0
Somers Point city	Atlantic	6	17	(0.2)	16
Ventnor City	Atlantic	6	41	(5.1)	21
Weymouth township	Atlantic	6	5	(0.1)	5
Avalon borough	Cape May	6	0	0.0	0
Cape May city	Cape May	6	4	(0.2)	3
Cape May Point borough	Cape May	6	0	0.0	0



Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change ¹⁰⁵	Present Need 2015
Dennis township	Cape May	6	41	2.8	52
Lower township	Cape May	6	41	(0.8)	38
Middle township	Cape May	6	43	1.9	51
North Wildwood city	Cape May	6	14	0.1	14
Ocean City	Cape May	6	62	(2.6)	51
Sea Isle City	Cape May	6	1	(0.2)	0
Stone Harbor borough	Cape May	6	0	0.0	0
Upper township	Cape May	6	10	(0.1)	10
West Cape May borough	Cape May	6	2	(0.5)	0
West Wildwood borough	Cape May	6	2	0.2	3
Wildwood city	Cape May	6	32	(4.4)	15
Wildwood Crest borough	Cape May	6	21	1.7	28
Woodbine borough	Cape May	6	2	(1.0)	0
Bridgeton city	Cumberland	6	281	4.7	300
Commercial township	Cumberland	6	7	0.4	8
Deerfield township	Cumberland	6	2	(1.5)	0
Downe township	Cumberland	6	9	(0.2)	8
Fairfield township	Cumberland	6	24	1.9	32
Greenwich township	Cumberland	6	6	0.5	8
Hopewell township	Cumberland	6	0	0.0	0
Lawrence township	Cumberland	6	6	0.0	6
Maurice River township	Cumberland	6	5	0.0	5
Millville city	Cumberland	6	114	0.8	117
Shiloh borough	Cumberland	6	2	0.2	3
Stow Creek township	Cumberland	6	1	(0.4)	0
Upper Deerfield township	Cumberland	6	19	0.2	20
Vineland city	Cumberland	6	291	(7.4)	262
Alloway township	Salem	6	0	(0.5)	0
Carneys Point township	Salem	6	27	1.1	31
Elmer borough	Salem	6	0	(0.5)	0
Elsinboro township	Salem	6	6	0.5	8
Lower Alloways Creek twp	Salem	6	4	(0.3)	3
Mannington township	Salem	6	3	(0.4)	2
Oldmans township	Salem	6	0	(0.5)	0
Penns Grove borough	Salem	6	55	0.7	58
Pennsville township	Salem	6	26	1.3	31
Pilesgrove township	Salem	6	19	1.4	24
Pittsgrove township	Salem	6	22	0.5	24
Quinton township	Salem	6	0	(0.6)	0
Salem city	Salem	6	22	(2.3)	13
Upper Pittsgrove township	Salem	6	6	0.3	7
Woodstown borough	Salem	6	1	(0.9)	0

APPENDIX B: MUNICIPAL ALLOCATION OF REGIONAL PROSPECTIVE NEED

TABLE B.1: QUALIFICATION OF URBAN AID MUNICIPALITIES

Municipality	County	Region	Housing Deficiency > Region	Pop Density 10,000+ per Sq Mile	Pop Density 6,000 – 10,000 & Vacant Land <5%	Qualifying
Asbury Park City	Monmouth	4	Y	Y	N	Y
Atlantic City	Atlantic	6	Y	N	N	Y
Bayonne City	Hudson	1	N	Y	N	Y
Belleville Township	Essex	2	Y	Y	N	Y
Bloomfield Township	Essex	2	Y	N	Y	Y
Brick Township	Ocean	4	N	N	N	N
Bridgeton City	Cumberland	6	Y	N	N	Y
Camden City	Camden	5	Y	N	N	Y
Carteret Borough	Middlesex	3	Y	N	N	Y
Clifton City	Passaic	1	Y	N	Y	Y
East Orange City	Essex	2	N	Y	N	Y
Elizabeth City	Union	2	Y	Y	N	Y
Garfield City	Bergen	1	N	Y	N	Y
Glassboro Borough	Gloucester	5	N	N	N	N
Gloucester City	Camden	5	Y	N	N	Y
Gloucester Township	Camden	5	N	N	N	N
Hackensack City	Bergen	1	N	Y	N	Y
Hillside Township	Union	2	Y	N	Y	Y
Hoboken City	Hudson	1	N	Y	N	Y
Irvington Township	Essex	2	Y	Y	N	Y
Jersey City	Hudson	1	Y	Y	N	Y
Kearny Town	Hudson	1	N	N	N	N
Lakewood Township	Ocean	4	Y	N	N	Y
Lindenwold Borough	Camden	5	Y	N	N	Y
Lodi Borough	Bergen	1	N	Y	N	Y
Long Branch City	Monmouth	4	Y	N	N	Y
Millville City	Cumberland	6	N	N	N	N
Monroe Township	Gloucester	5	N	N	N	N
Montclair Township	Essex	2	N	N	Y	Y
Mount Holly Township	Burlington	5	N	N	N	N

Municipality	County	Region	Housing Deficiency > Region	Pop Density 10,000+ per Sq Mile	Pop Density 6,000 – 10,000 & Vacant Land <5%	Qualifying
Neptune City Borough	Monmouth	4	N	N	N	N
Neptune Township	Monmouth	4	N	N	N	N
New Brunswick City	Middlesex	3	Y	Y	N	Y
Newark City	Essex	2	Y	Y	N	Y
North Bergen Township	Hudson	1	Y	Y	N	Y
Old Bridge Township	Middlesex	3	N	N	N	N
Orange City	Essex	2	Y	Y	N	Y
Passaic City	Passaic	1	Y	Y	N	Y
Paterson City	Passaic	1	Y	Y	N	Y
Pemberton Township	Burlington	5	N	N	N	N
Penns Grove Borough	Salem	6	Y	N	N	Y
Pennsauken Township	Camden	5	Y	N	N	Y
Perth Amboy City	Middlesex	3	Y	Y	N	Y
Phillipsburg Town	Warren	2	N	N	N	N
Plainfield City	Union	2	Y	N	Y	Y
Pleasantville City	Atlantic	6	Y	N	N	Y
Rahway City	Union	2	N	N	Y	Y
Roselle Borough	Union	2	Y	N	Y	Y
Salem City	Salem	6	N	N	N	N
Trenton City	Mercer	4	Y	Y	N	Y
Union City	Hudson	1	Y	Y	N	Y
Vineland City	Cumberland	6	Y	N	N	Y
Weehawken Township	Hudson	1	Y	Y	N	Y
West New York Town	Hudson	1	Y	Y	N	Y
Willingboro Township	Burlington	5	N	N	N	N
Winslow Township	Camden	5	N	N	N	N
Woodbridge Township	Middlesex	3	N	N	N	N
Woodbury City	Gloucester	5	N	N	N	N

TABLE B.2: MUNICIPAL ALLOCATION OF REGIONAL PROSPECTIVE NEED

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Allendale borough	Bergen	16,647	0.65%	0.00%	1.27%	0.75%	0.66%	111
Alpine borough	Bergen	16,647	0.08%	0.58%	1.20%	1.39%	0.81%	135
Bergenfield borough	Bergen	16,647	0.69%	0.62%	1.05%	0.17%	0.63%	105
Bogota borough	Bergen	16,647	0.19%	0.00%	0.52%	0.10%	0.20%	34
Carlstadt borough	Bergen	16,647	2.36%	0.00%	0.35%	0.07%	0.69%	116
Cliffside Park borough	Bergen	16,647	0.45%	0.00%	0.74%	0.14%	0.33%	55
Closter borough	Bergen	16,647	0.53%	0.00%	1.20%	0.66%	0.60%	99
Cresskill borough	Bergen	16,647	0.66%	4.87%	1.08%	0.41%	1.76%	293
Demarest borough	Bergen	16,647	0.13%	0.01%	1.31%	0.42%	0.47%	78
Dumont borough	Bergen	16,647	0.38%	1.33%	0.96%	0.08%	0.69%	114
East Rutherford borough	Bergen	16,647	1.52%	0.00%	0.46%	0.63%	0.65%	108
Edgewater borough	Bergen	16,647	0.83%	4.23%	1.35%	0.72%	1.78%	297
Elmwood Park borough	Bergen	16,647	1.53%	2.21%	0.52%	0.43%	1.17%	195
Emerson borough	Bergen	16,647	0.40%	0.00%	0.82%	1.43%	0.66%	110
Englewood city	Bergen	16,647	2.72%	0.00%	1.37%	1.24%	1.34%	222
Englewood Cliffs borough	Bergen	16,647	1.60%	2.12%	1.13%	0.94%	1.45%	241
Fair Lawn borough	Bergen	16,647	2.30%	3.08%	1.78%	0.83%	2.00%	333
Fairview borough	Bergen	16,647	0.42%	0.00%	0.15%	0.22%	0.20%	33
Fort Lee borough	Bergen	16,647	2.26%	0.00%	1.57%	0.35%	1.05%	174
Franklin Lakes borough	Bergen	16,647	1.38%	0.00%	2.24%	4.37%	2.00%	332
Garfield city	Bergen	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Glen Rock borough	Bergen	16,647	0.60%	0.00%	2.12%	0.36%	0.77%	128
Hackensack city	Bergen	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Harrington Park borough	Bergen	16,647	0.21%	0.58%	1.17%	1.07%	0.76%	126
Hasbrouck Heights borough	Bergen	16,647	1.19%	6.45%	0.84%	0.23%	2.18%	363
Haworth borough	Bergen	16,647	0.13%	0.00%	1.09%	0.43%	0.41%	69
Hillsdale borough	Bergen	16,647	0.38%	0.00%	1.15%	1.40%	0.73%	121
Ho-Ho-Kus borough	Bergen	16,647	0.18%	0.00%	1.56%	0.60%	0.59%	98
Leonia borough	Bergen	16,647	0.43%	0.92%	0.71%	0.10%	0.54%	90
Little Ferry borough	Bergen	16,647	0.59%	0.00%	0.47%	0.40%	0.37%	61
Lodi borough	Bergen	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lyndhurst township	Bergen	16,647	1.97%	0.00%	0.74%	1.13%	0.96%	160
Mahwah township	Bergen	16,647	2.92%	0.00%	1.92%	2.16%	1.75%	292
Maywood borough	Bergen	16,647	0.56%	0.00%	0.68%	0.39%	0.41%	68
Midland Park borough	Bergen	16,647	0.60%	0.00%	0.65%	0.12%	0.34%	57
Montvale borough	Bergen	16,647	1.93%	2.40%	1.03%	2.37%	1.93%	321
Moonachie borough	Bergen	16,647	1.46%	0.00%	0.12%	0.12%	0.43%	71
New Milford borough	Bergen	16,647	0.39%	1.02%	0.77%	0.11%	0.57%	95

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
North Arlington borough	Bergen	16,647	0.64%	0.33%	0.68%	0.43%	0.52%	87
Northvale borough	Bergen	16,647	0.64%	0.00%	0.51%	0.24%	0.35%	58
Norwood borough	Bergen	16,647	0.33%	0.00%	0.73%	0.57%	0.41%	68
Oakland borough	Bergen	16,647	0.95%	0.00%	1.28%	0.45%	0.67%	112
Old Tappan borough	Bergen	16,647	0.39%	3.22%	1.13%	0.98%	1.43%	238
Oradell borough	Bergen	16,647	0.57%	0.00%	1.60%	0.08%	0.56%	94
Palisades Park borough	Bergen	16,647	0.58%	0.00%	0.47%	0.21%	0.31%	52
Paramus borough	Bergen	16,647	7.72%	0.00%	1.68%	2.97%	3.09%	515
Park Ridge borough	Bergen	16,647	0.64%	0.50%	1.02%	0.40%	0.64%	107
Ramsey borough	Bergen	16,647	1.87%	0.00%	1.81%	1.28%	1.24%	207
Ridgefield borough	Bergen	16,647	0.84%	0.00%	0.44%	0.78%	0.51%	86
Ridgefield Park village	Bergen	16,647	0.74%	0.00%	0.43%	0.34%	0.38%	63
Ridgewood village	Bergen	16,647	2.14%	1.12%	3.30%	1.16%	1.93%	322
River Edge borough	Bergen	16,647	0.66%	1.90%	0.99%	0.11%	0.92%	152
River Vale township	Bergen	16,647	0.27%	0.00%	1.43%	0.85%	0.64%	106
Rochelle Park township	Bergen	16,647	0.83%	0.00%	0.41%	0.10%	0.34%	56
Rockleigh borough	Bergen	16,647	0.34%	2.97%	1.31%	0.21%	1.20%	200
Rutherford borough	Bergen	16,647	1.29%	3.21%	1.07%	0.12%	1.42%	237
Saddle Brook township	Bergen	16,647	1.69%	0.00%	0.69%	0.60%	0.74%	124
Saddle River borough	Bergen	16,647	0.17%	1.46%	1.04%	3.58%	1.56%	260
South Hackensack township	Bergen	16,647	0.93%	0.00%	0.28%	0.15%	0.34%	56
Teaneck township	Bergen	16,647	3.15%	14.83%	2.04%	0.38%	5.10%	849
Tenaflly borough	Bergen	16,647	0.70%	0.00%	2.24%	0.61%	0.89%	148
Teterboro borough	Bergen	16,647	1.28%	0.95%	0.37%	0.01%	0.65%	108
Upper Saddle River borough	Bergen	16,647	0.85%	2.66%	2.19%	0.85%	1.64%	272
Waldwick borough	Bergen	16,647	0.51%	0.10%	1.03%	0.51%	0.54%	90
Wallington borough	Bergen	16,647	0.41%	0.00%	0.20%	0.20%	0.20%	34
Washington township	Bergen	16,647	0.28%	3.24%	1.22%	0.77%	1.38%	229
Westwood borough	Bergen	16,647	0.70%	0.00%	0.73%	0.51%	0.49%	81
Woodcliff Lake borough	Bergen	16,647	0.92%	2.35%	1.25%	1.76%	1.57%	261
Wood-Ridge borough	Bergen	16,647	0.39%	0.00%	0.75%	0.06%	0.30%	50
Wyckoff township	Bergen	16,647	0.95%	0.00%	2.42%	2.18%	1.39%	231
Bayonne city	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Newark borough	Hudson	16,647	0.04%	0.00%	0.10%	0.07%	0.05%	9
Guttenberg town	Hudson	16,647	0.18%	0.00%	0.29%	0.15%	0.16%	26
Harrison town	Hudson	16,647	0.83%	3.09%	0.20%	0.17%	1.07%	179
Hoboken city	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Jersey City	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kearny town	Hudson	16,647	2.36%	0.00%	0.69%	2.97%	1.51%	251
North Bergen township	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0



Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Secaucus town	Hudson	16,647	6.62%	0.00%	1.00%	0.07%	1.92%	320
Union City	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Weehawken township	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
West New York town	Hudson	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Bloomingtondale borough	Passaic	16,647	0.21%	0.00%	0.43%	0.35%	0.25%	41
Clifton city	Passaic	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haledon borough	Passaic	16,647	0.24%	0.00%	0.26%	0.52%	0.25%	42
Hawthorne borough	Passaic	16,647	1.09%	0.00%	0.89%	1.10%	0.77%	128
Little Falls township	Passaic	16,647	1.14%	0.00%	0.59%	1.89%	0.91%	151
North Haledon borough	Passaic	16,647	0.28%	0.30%	0.86%	1.94%	0.84%	140
Passaic city	Passaic	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Paterson city	Passaic	16,647	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pompton Lakes borough	Passaic	16,647	0.36%	0.00%	0.76%	0.46%	0.39%	65
Prospect Park borough	Passaic	16,647	0.10%	0.45%	0.18%	0.62%	0.34%	56
Ringwood borough	Passaic	16,647	0.37%	0.00%	0.99%	0.00%	0.34%	57
Totowa borough	Passaic	16,647	2.28%	0.00%	0.61%	2.39%	1.32%	219
Wanaque borough	Passaic	16,647	0.38%	0.98%	0.73%	0.65%	0.69%	114
Wayne township	Passaic	16,647	6.65%	0.00%	3.07%	10.94%	5.17%	860
West Milford township	Passaic	16,647	0.70%	0.00%	1.39%	0.00%	0.52%	87
Woodland Park borough	Passaic	16,647	0.82%	0.58%	0.62%	2.10%	1.03%	171
Andover borough	Sussex	16,647	0.03%	0.03%	0.37%	0.00%	0.11%	18
Andover township	Sussex	16,647	0.57%	6.02%	0.84%	0.00%	1.86%	309
Branchville borough	Sussex	16,647	0.27%	4.30%	0.23%	0.00%	1.20%	199
Byram township	Sussex	16,647	0.23%	1.57%	0.89%	0.00%	0.67%	112
Frankford township	Sussex	16,647	0.26%	0.00%	0.71%	0.00%	0.24%	40
Franklin borough	Sussex	16,647	0.19%	0.13%	0.23%	2.23%	0.69%	116
Fredon township	Sussex	16,647	0.13%	1.83%	0.73%	0.00%	0.67%	112
Green township	Sussex	16,647	0.06%	0.00%	0.83%	0.46%	0.34%	56
Hamburg borough	Sussex	16,647	0.13%	0.00%	0.26%	1.31%	0.42%	71
Hampton township	Sussex	16,647	0.37%	0.00%	0.49%	0.00%	0.22%	36
Hardyston township	Sussex	16,647	0.46%	3.61%	0.68%	9.34%	3.52%	586
Hopalong borough	Sussex	16,647	0.22%	0.85%	0.91%	1.09%	0.77%	128
Lafayette township	Sussex	16,647	0.22%	1.46%	0.59%	0.00%	0.57%	95
Montague township	Sussex	16,647	0.12%	1.37%	0.23%	0.00%	0.43%	72
Newton town	Sussex	16,647	0.63%	0.00%	0.12%	0.00%	0.19%	31
Ogdensburg borough	Sussex	16,647	0.03%	0.00%	0.37%	0.04%	0.11%	19
Sandyston township	Sussex	16,647	0.08%	0.64%	0.35%	0.00%	0.27%	45
Sparta township	Sussex	16,647	1.02%	0.00%	1.95%	4.63%	1.90%	316
Stanhope borough	Sussex	16,647	0.23%	0.00%	0.50%	0.15%	0.22%	37
Stillwater township	Sussex	16,647	0.11%	0.81%	0.47%	0.00%	0.35%	58

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Sussex borough	Sussex	16,647	0.08%	0.00%	0.00%	0.00%	0.02%	3
Vernon township	Sussex	16,647	0.62%	2.70%	1.00%	4.55%	2.22%	369
Walpack township	Sussex	16,647	0.00%	0.01%	0.00%	0.00%	0.00%	1
Wantage township	Sussex	16,647	0.33%	0.00%	0.78%	0.00%	0.28%	46
Belleville township	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Bloomfield township	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Caldwell borough	Essex	12,628	0.38%	0.00%	0.51%	0.04%	0.23%	29
Cedar Grove township	Essex	12,628	0.88%	0.00%	1.00%	1.56%	0.86%	108
City of Orange township	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Orange city	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Essex Fells borough	Essex	12,628	0.04%	0.05%	1.44%	0.17%	0.43%	54
Fairfield township	Essex	12,628	3.71%	0.00%	0.82%	1.41%	1.48%	188
Glen Ridge borough	Essex	12,628	0.19%	0.07%	1.83%	0.02%	0.53%	67
Irvington township	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Livingston township	Essex	12,628	3.98%	0.00%	2.80%	2.03%	2.20%	278
Maplewood township	Essex	12,628	1.08%	0.35%	1.92%	0.13%	0.87%	110
Millburn township	Essex	12,628	2.85%	6.52%	3.38%	0.47%	3.30%	417
Montclair township	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Newark city	Essex	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Caldwell borough	Essex	12,628	0.19%	0.99%	2.13%	0.42%	0.93%	118
Nutley township	Essex	12,628	1.17%	0.00%	1.18%	0.48%	0.71%	89
Roseland borough	Essex	12,628	1.91%	0.00%	0.98%	0.39%	0.82%	104
S. Orange Village township	Essex	12,628	1.17%	10.50%	1.63%	0.22%	3.38%	427
Verona township	Essex	12,628	0.69%	0.00%	1.20%	0.46%	0.59%	74
West Caldwell township	Essex	12,628	1.57%	1.05%	0.95%	0.51%	1.02%	129
West Orange township	Essex	12,628	2.46%	0.00%	2.15%	5.93%	2.63%	333
Boonton town	Morris	12,628	0.52%	0.00%	0.68%	0.36%	0.39%	50
Boonton township	Morris	12,628	0.14%	0.12%	0.94%	0.99%	0.55%	69
Butler borough	Morris	12,628	0.59%	0.71%	0.58%	0.49%	0.59%	75
Chatham borough	Morris	12,628	0.67%	0.00%	1.70%	0.58%	0.74%	93
Chatham township	Morris	12,628	0.67%	5.84%	1.94%	1.53%	2.50%	315
Chester borough	Morris	12,628	0.32%	1.43%	0.63%	0.28%	0.66%	84
Chester township	Morris	12,628	0.32%	0.00%	1.92%	0.20%	0.61%	77
Denville township	Morris	12,628	1.59%	0.54%	1.40%	1.71%	1.31%	165
Dover town	Morris	12,628	1.01%	0.00%	0.25%	0.28%	0.38%	48
East Hanover township	Morris	12,628	2.90%	0.08%	1.10%	1.35%	1.36%	171
Florham Park borough	Morris	12,628	3.54%	16.57%	1.24%	4.97%	6.58%	831
Hanover township	Morris	12,628	2.78%	0.00%	1.19%	3.69%	1.92%	242
Harding township	Morris	12,628	0.33%	2.15%	1.78%	0.68%	1.24%	156
Jefferson township	Morris	12,628	0.69%	2.84%	1.14%	0.05%	1.18%	149

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Kinnelon borough	Morris	12,628	0.27%	1.21%	1.46%	0.00%	0.74%	93
Lincoln Park borough	Morris	12,628	0.57%	0.46%	0.63%	3.18%	1.21%	153
Long Hill township	Morris	12,628	0.49%	0.00%	1.05%	0.02%	0.39%	49
Madison borough	Morris	12,628	0.84%	0.00%	1.62%	0.79%	0.81%	102
Mendham borough	Morris	12,628	0.28%	0.00%	1.09%	1.11%	0.62%	78
Mendham township	Morris	12,628	0.17%	0.86%	1.85%	0.77%	0.92%	116
Mine Hill township	Morris	12,628	0.11%	0.72%	0.57%	0.87%	0.57%	72
Montville township	Morris	12,628	1.63%	0.00%	1.90%	1.62%	1.29%	163
Morris township	Morris	12,628	2.36%	8.26%	2.45%	4.95%	4.50%	569
Morris Plains borough	Morris	12,628	0.63%	0.00%	0.89%	0.57%	0.52%	66
Morristown town	Morris	12,628	3.22%	0.00%	0.77%	0.75%	1.18%	150
Mountain Lakes borough	Morris	12,628	0.41%	0.00%	1.60%	0.11%	0.53%	67
Mount Arlington borough	Morris	12,628	0.28%	1.19%	0.54%	0.20%	0.55%	70
Mount Olive township	Morris	12,628	1.96%	5.64%	1.27%	3.51%	3.10%	391
Netcong borough	Morris	12,628	0.27%	0.00%	0.10%	0.16%	0.13%	17
Parsippany-Troy Hills twp	Morris	12,628	9.64%	0.00%	2.06%	6.17%	4.47%	564
Pequannock township	Morris	12,628	0.88%	0.00%	0.92%	1.09%	0.72%	91
Randolph township	Morris	12,628	1.38%	1.17%	2.30%	1.84%	1.67%	211
Riverdale borough	Morris	12,628	0.62%	2.47%	0.52%	1.32%	1.23%	156
Rockaway borough	Morris	12,628	0.69%	1.56%	0.50%	0.24%	0.75%	94
Rockaway township	Morris	12,628	1.79%	2.90%	1.54%	2.43%	2.17%	274
Roxbury township	Morris	12,628	1.37%	0.00%	1.37%	2.95%	1.42%	180
Victory Gardens borough	Morris	12,628	0.03%	0.00%	0.05%	0.06%	0.04%	5
Washington township	Morris	12,628	0.66%	1.16%	1.75%	0.19%	0.94%	119
Wharton borough	Morris	12,628	0.48%	1.92%	0.37%	0.42%	0.80%	101
Berkeley Heights township	Union	12,628	1.37%	5.89%	1.76%	1.71%	2.68%	339
Clark township	Union	12,628	1.48%	0.00%	1.00%	0.86%	0.83%	105
Cranford township	Union	12,628	2.36%	0.00%	1.71%	0.37%	1.11%	140
Elizabeth city	Union	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Fanwood borough	Union	12,628	0.19%	0.00%	1.12%	0.22%	0.38%	48
Garwood borough	Union	12,628	0.38%	0.00%	0.49%	0.04%	0.23%	29
Hillside township	Union	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kenilworth borough	Union	12,628	1.27%	0.00%	0.65%	0.35%	0.57%	72
Linden city	Union	12,628	2.99%	0.00%	0.61%	5.39%	2.25%	284
Mountainside borough	Union	12,628	0.94%	0.00%	1.33%	0.48%	0.69%	87
New Providence borough	Union	12,628	1.47%	0.00%	1.55%	0.64%	0.91%	115
Plainfield city	Union	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Rahway city	Union	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle borough	Union	12,628	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle Park borough	Union	12,628	0.34%	0.00%	0.35%	0.13%	0.21%	26

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Scotch Plains township	Union	12,628	0.96%	0.00%	1.86%	1.40%	1.05%	133
Springfield township	Union	12,628	1.75%	0.00%	1.08%	0.26%	0.77%	97
Summit city	Union	12,628	2.80%	2.82%	2.77%	0.67%	2.27%	286
Union township	Union	12,628	5.21%	0.00%	1.51%	0.93%	1.91%	241
Westfield town	Union	12,628	1.68%	0.00%	3.13%	0.63%	1.36%	172
Winfield township	Union	12,628	0.02%	0.08%	0.14%	0.67%	0.23%	29
Allamuchy township	Warren	12,628	0.16%	1.31%	0.54%	1.17%	0.80%	101
Alpha borough	Warren	12,628	0.15%	0.65%	0.15%	0.28%	0.31%	39
Belvidere town	Warren	12,628	0.10%	0.00%	0.19%	1.40%	0.42%	53
Blairstown township	Warren	12,628	0.26%	0.00%	0.53%	0.00%	0.20%	25
Franklin township	Warren	12,628	0.12%	0.46%	0.63%	0.10%	0.33%	42
Frelinghuysen township	Warren	12,628	0.06%	0.42%	0.61%	3.03%	1.03%	130
Greenwich township	Warren	12,628	0.17%	0.86%	0.87%	1.79%	0.92%	116
Hackettstown town	Warren	12,628	1.00%	0.00%	0.40%	0.74%	0.54%	68
Hardwick township	Warren	12,628	0.04%	0.25%	0.62%	0.00%	0.23%	29
Harmony township	Warren	12,628	0.10%	0.12%	0.42%	0.20%	0.21%	26
Hope township	Warren	12,628	0.08%	0.25%	0.51%	0.00%	0.21%	26
Independence township	Warren	12,628	0.14%	0.04%	0.47%	0.28%	0.23%	29
Knowlton township	Warren	12,628	0.07%	0.00%	0.47%	0.00%	0.14%	17
Liberty township	Warren	12,628	0.06%	0.55%	0.51%	0.00%	0.28%	35
Lopatcong township	Warren	12,628	0.34%	0.00%	0.49%	0.48%	0.33%	42
Mansfield township	Warren	12,628	0.28%	2.35%	0.35%	1.03%	1.00%	126
Oxford township	Warren	12,628	0.18%	0.98%	0.27%	0.53%	0.49%	62
Phillipsburg town	Warren	12,628	0.90%	0.00%	0.01%	0.52%	0.36%	45
Pohatcong township	Warren	12,628	0.43%	1.84%	0.36%	0.72%	0.84%	105
Washington borough	Warren	12,628	0.27%	0.00%	0.20%	0.41%	0.22%	28
Washington township	Warren	12,628	0.28%	1.79%	0.62%	1.90%	1.15%	145
White township	Warren	12,628	0.20%	0.00%	0.14%	3.94%	1.07%	135
Alexandria township	Hunterdon	7,543	0.15%	0.10%	1.58%	0.13%	0.49%	37
Bethlehem township	Hunterdon	7,543	0.10%	0.55%	1.49%	0.00%	0.54%	40
Bloomsbury borough	Hunterdon	7,543	0.18%	1.82%	0.68%	0.00%	0.67%	50
Califon borough	Hunterdon	7,543	0.05%	0.18%	1.17%	0.00%	0.35%	26
Clinton town	Hunterdon	7,543	0.27%	0.00%	0.87%	0.29%	0.36%	27
Clinton township	Hunterdon	7,543	1.01%	1.70%	2.01%	1.19%	1.48%	111
Delaware township	Hunterdon	7,543	0.10%	0.03%	1.33%	0.00%	0.37%	28
East Amwell township	Hunterdon	7,543	0.14%	0.38%	1.09%	0.00%	0.40%	30
Flemington borough	Hunterdon	7,543	0.73%	0.07%	0.00%	0.05%	0.21%	16
Franklin township	Hunterdon	7,543	0.14%	0.00%	0.74%	0.00%	0.22%	17
Frenchtown borough	Hunterdon	7,543	0.09%	0.45%	0.34%	0.00%	0.22%	17
Glen Gardner borough	Hunterdon	7,543	0.02%	0.00%	0.39%	0.00%	0.10%	8

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Hampton borough	Hunterdon	7,543	0.05%	0.28%	0.31%	0.03%	0.17%	13
High Bridge borough	Hunterdon	7,543	0.16%	0.36%	0.86%	0.15%	0.38%	29
Holland township	Hunterdon	7,543	0.11%	0.00%	0.94%	0.03%	0.27%	20
Kingwood township	Hunterdon	7,543	0.13%	0.22%	1.09%	0.00%	0.36%	27
Lambertville city	Hunterdon	7,543	0.24%	0.17%	0.65%	0.00%	0.26%	20
Lebanon borough	Hunterdon	7,543	0.20%	0.93%	0.62%	0.15%	0.48%	36
Lebanon township	Hunterdon	7,543	0.16%	0.00%	1.33%	0.00%	0.37%	28
Milford borough	Hunterdon	7,543	0.06%	0.00%	0.51%	0.24%	0.20%	15
Raritan township	Hunterdon	7,543	2.06%	2.85%	2.46%	3.24%	2.65%	200
Readington township	Hunterdon	7,543	1.81%	7.71%	2.47%	7.96%	4.99%	376
Stockton borough	Hunterdon	7,543	0.03%	0.11%	0.54%	0.00%	0.17%	13
Tewksbury township	Hunterdon	7,543	0.32%	0.34%	2.89%	0.09%	0.91%	69
Union township	Hunterdon	7,543	0.30%	0.00%	1.26%	0.09%	0.41%	31
West Amwell township	Hunterdon	7,543	0.13%	0.00%	1.00%	0.00%	0.28%	21
Carteret borough	Middlesex	7,543	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cranbury township	Middlesex	7,543	1.26%	0.00%	1.95%	1.99%	1.30%	98
Dunellen borough	Middlesex	7,543	0.15%	0.00%	0.55%	0.02%	0.18%	13
East Brunswick township	Middlesex	7,543	4.31%	1.12%	2.88%	3.35%	2.91%	220
Edison township	Middlesex	7,543	12.56%	0.00%	4.57%	4.23%	5.34%	403
Helmetta borough	Middlesex	7,543	0.03%	0.02%	0.50%	0.07%	0.16%	12
Highland Park borough	Middlesex	7,543	0.44%	0.00%	0.81%	0.12%	0.34%	26
Jamesburg borough	Middlesex	7,543	0.41%	1.96%	0.09%	0.27%	0.68%	51
Metuchen borough	Middlesex	7,543	1.04%	1.96%	1.63%	0.09%	1.18%	89
Middlesex borough	Middlesex	7,543	0.89%	0.00%	0.80%	0.24%	0.48%	36
Milltown borough	Middlesex	7,543	0.33%	0.00%	0.96%	0.11%	0.35%	26
Monroe township	Middlesex	7,543	1.90%	9.11%	1.92%	11.08%	6.00%	453
New Brunswick city	Middlesex	7,543	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Brunswick township	Middlesex	7,543	3.81%	2.37%	1.61%	1.97%	2.44%	184
Old Bridge township	Middlesex	7,543	2.05%	0.83%	2.63%	6.86%	3.09%	233
Perth Amboy city	Middlesex	7,543	0.00%	0.00%	0.00%	0.00%	0.00%	0
Piscataway township	Middlesex	7,543	6.55%	0.00%	2.25%	2.42%	2.80%	212
Plainsboro township	Middlesex	7,543	2.75%	2.80%	1.96%	3.87%	2.84%	214
Sayreville borough	Middlesex	7,543	1.67%	1.66%	1.46%	2.17%	1.74%	132
South Amboy city	Middlesex	7,543	0.33%	0.03%	0.60%	0.46%	0.35%	27
South Brunswick township	Middlesex	7,543	4.41%	0.00%	3.18%	9.99%	4.39%	332
South Plainfield borough	Middlesex	7,543	3.82%	3.42%	1.35%	0.53%	2.28%	172
South River borough	Middlesex	7,543	0.42%	0.00%	0.40%	0.24%	0.27%	20
Spotswood borough	Middlesex	7,543	0.38%	0.00%	0.58%	0.23%	0.30%	22
Woodbridge township	Middlesex	7,543	9.58%	3.93%	2.40%	2.70%	4.65%	351
Bedminster township	Somerset	7,543	1.74%	0.84%	1.33%	0.42%	1.08%	82

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Bernards township	Somerset	7,543	2.86%	17.47%	4.15%	2.07%	6.64%	501
Bernardsville borough	Somerset	7,543	0.48%	0.00%	1.71%	0.56%	0.69%	52
Bound Brook borough	Somerset	7,543	0.41%	0.00%	0.31%	0.06%	0.19%	15
Branchburg township	Somerset	7,543	2.23%	4.93%	2.22%	2.82%	3.05%	230
Bridgewater township	Somerset	7,543	6.26%	0.00%	3.75%	4.00%	3.50%	264
Far Hills borough	Somerset	7,543	0.05%	0.00%	1.05%	0.21%	0.32%	24
Franklin township	Somerset	7,543	5.84%	8.20%	2.90%	5.44%	5.59%	422
Green Brook township	Somerset	7,543	0.61%	2.41%	1.70%	0.65%	1.34%	101
Hillsborough township	Somerset	7,543	1.95%	9.23%	3.21%	8.71%	5.78%	436
Manville borough	Somerset	7,543	0.33%	0.00%	0.27%	0.04%	0.16%	12
Millstone borough	Somerset	7,543	0.02%	0.22%	0.50%	0.08%	0.21%	16
Montgomery township	Somerset	7,543	2.22%	4.54%	3.85%	2.59%	3.30%	249
North Plainfield borough	Somerset	7,543	0.53%	0.19%	0.42%	0.04%	0.29%	22
Peapack & Gladstone bor.	Somerset	7,543	0.52%	3.09%	1.83%	0.43%	1.47%	111
Raritan borough	Somerset	7,543	1.59%	0.00%	0.57%	0.15%	0.57%	43
Rocky Hill borough	Somerset	7,543	0.06%	0.00%	0.68%	0.06%	0.20%	15
Somerville borough	Somerset	7,543	1.28%	0.00%	0.50%	0.10%	0.47%	35
South Bound Brook borough	Somerset	7,543	0.07%	0.00%	0.42%	0.01%	0.12%	9
Warren township	Somerset	7,543	2.22%	0.19%	3.35%	3.77%	2.38%	180
Watchung borough	Somerset	7,543	0.89%	1.23%	1.59%	1.17%	1.22%	92
East Windsor township	Mercer	5,929	1.54%	2.79%	1.45%	3.28%	2.26%	134
Ewing township	Mercer	5,929	6.55%	16.46%	1.35%	1.23%	6.40%	379
Hamilton township	Mercer	5,929	6.93%	11.25%	2.80%	3.90%	6.22%	369
Hightstown borough	Mercer	5,929	0.49%	0.00%	0.61%	0.06%	0.29%	17
Hopewell borough	Mercer	5,929	0.13%	0.00%	0.75%	0.00%	0.22%	13
Hopewell township	Mercer	5,929	2.44%	12.56%	2.49%	5.09%	5.64%	335
Lawrence township	Mercer	5,929	3.91%	1.56%	1.81%	1.87%	2.29%	136
Pennington borough	Mercer	5,929	0.39%	0.00%	0.97%	0.03%	0.35%	21
Princeton	Mercer	5,929	5.64%	5.97%	2.69%	1.91%	4.05%	240
Robbinsville township	Mercer	5,929	1.33%	2.98%	1.55%	2.46%	2.08%	123
Trenton city	Mercer	5,929	0.00%	0.00%	0.00%	0.00%	0.00%	0
West Windsor township	Mercer	5,929	4.83%	0.00%	3.20%	4.24%	3.07%	182
Aberdeen township	Monmouth	5,929	0.72%	0.43%	1.17%	0.44%	0.69%	41
Allenhurst borough	Monmouth	5,929	0.06%	0.00%	0.55%	0.01%	0.15%	9
Allentown borough	Monmouth	5,929	0.12%	0.00%	0.79%	0.00%	0.23%	13
Asbury Park city	Monmouth	5,929	0.00%	0.00%	0.00%	0.00%	0.00%	0
Atlantic Highlands borough	Monmouth	5,929	0.19%	0.00%	0.76%	0.08%	0.26%	15
Avon-by-the-Sea borough	Monmouth	5,929	0.07%	0.00%	0.48%	0.01%	0.14%	8
Belmar borough	Monmouth	5,929	0.21%	0.04%	0.45%	0.06%	0.19%	11
Bradley Beach borough	Monmouth	5,929	0.13%	0.13%	0.50%	0.03%	0.20%	12

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Brielle borough	Monmouth	5,929	0.26%	0.35%	1.05%	0.21%	0.47%	28
Colts Neck township	Monmouth	5,929	0.48%	0.30%	1.79%	0.00%	0.64%	38
Deal borough	Monmouth	5,929	0.07%	0.00%	0.57%	0.12%	0.19%	11
Eatontown borough	Monmouth	5,929	2.36%	1.05%	0.68%	0.50%	1.15%	68
Englishtown borough	Monmouth	5,929	0.13%	0.00%	0.60%	0.03%	0.19%	11
Fair Haven borough	Monmouth	5,929	0.15%	0.00%	1.52%	0.03%	0.42%	25
Farmingdale borough	Monmouth	5,929	0.11%	0.00%	0.30%	0.04%	0.11%	7
Freehold borough	Monmouth	5,929	0.84%	0.00%	0.44%	0.17%	0.36%	22
Freehold township	Monmouth	5,929	4.59%	3.06%	2.18%	3.52%	3.34%	198
Hazlet township	Monmouth	5,929	1.19%	0.00%	1.17%	0.37%	0.68%	41
Highlands borough	Monmouth	5,929	0.13%	0.00%	0.56%	0.07%	0.19%	11
Holmdel township	Monmouth	5,929	1.50%	0.00%	2.14%	0.41%	1.01%	60
Howell township	Monmouth	5,929	2.75%	3.88%	2.39%	1.74%	2.69%	160
Interlaken borough	Monmouth	5,929	0.01%	0.00%	1.01%	0.00%	0.26%	15
Keansburg borough	Monmouth	5,929	0.31%	0.49%	0.28%	0.08%	0.29%	17
Keyport borough	Monmouth	5,929	0.36%	0.00%	0.41%	0.06%	0.21%	12
Lake Como borough	Monmouth	5,929	0.06%	0.00%	0.34%	0.02%	0.10%	6
Little Silver borough	Monmouth	5,929	0.42%	0.00%	1.42%	0.12%	0.49%	29
Loch Arbour village	Monmouth	5,929	0.00%	0.00%	0.81%	0.01%	0.21%	12
Long Branch city	Monmouth	5,929	0.00%	0.00%	0.00%	0.00%	0.00%	0
Manalapan township	Monmouth	5,929	1.71%	0.21%	2.55%	2.39%	1.71%	102
Manasquan borough	Monmouth	5,929	0.31%	0.00%	0.82%	0.05%	0.29%	17
Marlboro township	Monmouth	5,929	2.03%	3.13%	3.38%	3.81%	3.09%	183
Matawan borough	Monmouth	5,929	0.55%	0.00%	0.91%	0.04%	0.37%	22
Middletown township	Monmouth	5,929	3.90%	1.69%	3.74%	2.74%	3.02%	179
Millstone township	Monmouth	5,929	0.39%	0.97%	1.63%	0.00%	0.75%	44
Monmouth Beach borough	Monmouth	5,929	0.07%	0.00%	0.75%	0.09%	0.23%	14
Neptune township	Monmouth	5,929	2.67%	1.15%	1.05%	0.05%	1.23%	73
Neptune City borough	Monmouth	5,929	0.47%	1.40%	0.52%	0.03%	0.61%	36
Ocean township	Monmouth	5,929	1.80%	0.18%	1.49%	1.22%	1.17%	70
Oceanport borough	Monmouth	5,929	0.76%	1.42%	0.90%	0.15%	0.81%	48
Red Bank borough	Monmouth	5,929	2.20%	0.00%	0.66%	0.16%	0.76%	45
Roosevelt borough	Monmouth	5,929	0.02%	0.00%	0.49%	0.00%	0.13%	8
Rumson borough	Monmouth	5,929	0.34%	0.47%	1.61%	0.23%	0.66%	39
Sea Bright borough	Monmouth	5,929	0.08%	0.00%	0.61%	0.00%	0.17%	10
Sea Girt borough	Monmouth	5,929	0.16%	0.55%	0.93%	0.02%	0.41%	25
Shrewsbury borough	Monmouth	5,929	1.14%	0.06%	1.03%	0.04%	0.57%	34
Shrewsbury township	Monmouth	5,929	0.14%	0.84%	0.24%	0.00%	0.30%	18
Spring Lake borough	Monmouth	5,929	0.18%	0.00%	1.05%	0.04%	0.32%	19
Spring Lake Heights bor.	Monmouth	5,929	0.19%	0.00%	0.53%	0.03%	0.19%	11

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Tinton Falls borough	Monmouth	5,929	2.20%	4.46%	1.06%	1.66%	2.35%	139
Union Beach borough	Monmouth	5,929	0.20%	0.51%	0.59%	0.14%	0.36%	21
Upper Freehold township	Monmouth	5,929	0.35%	0.18%	1.27%	0.00%	0.45%	27
Wall township	Monmouth	5,929	3.36%	1.47%	1.81%	6.36%	3.25%	193
West Long Branch borough	Monmouth	5,929	1.04%	0.00%	0.80%	0.18%	0.51%	30
Barnegat township	Ocean	5,929	0.50%	0.96%	0.77%	3.95%	1.54%	91
Barnegat Light borough	Ocean	5,929	0.03%	0.09%	0.50%	0.00%	0.16%	9
Bay Head borough	Ocean	5,929	0.04%	0.00%	0.57%	0.02%	0.16%	9
Beach Haven borough	Ocean	5,929	0.12%	0.21%	0.50%	0.00%	0.21%	12
Beachwood borough	Ocean	5,929	0.17%	0.00%	0.79%	0.11%	0.27%	16
Berkeley township	Ocean	5,929	0.99%	1.18%	0.87%	4.58%	1.90%	113
Brick township	Ocean	5,929	3.96%	5.92%	2.45%	1.63%	3.49%	207
Eagleswood township	Ocean	5,929	0.11%	0.25%	0.42%	1.65%	0.61%	36
Harvey Cedars borough	Ocean	5,929	0.02%	0.00%	0.60%	0.00%	0.15%	9
Island Heights borough	Ocean	5,929	0.06%	0.04%	0.53%	0.06%	0.17%	10
Jackson township	Ocean	5,929	2.07%	3.28%	2.45%	10.94%	4.68%	278
Lacey township	Ocean	5,929	1.09%	1.13%	1.14%	1.94%	1.32%	78
Lakehurst borough	Ocean	5,929	0.11%	0.00%	0.35%	0.03%	0.12%	7
Lakewood township	Ocean	5,929	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lavallette borough	Ocean	5,929	0.06%	0.00%	0.43%	0.00%	0.12%	7
Little Egg Harbor township	Ocean	5,929	0.45%	0.00%	0.69%	5.30%	1.61%	95
Long Beach township	Ocean	5,929	0.18%	0.15%	0.68%	0.00%	0.25%	15
Manchester township	Ocean	5,929	0.99%	1.61%	0.65%	7.51%	2.69%	159
Mantoloking borough	Ocean	5,929	0.00%	0.00%	1.10%	0.00%	0.28%	16
Ocean township	Ocean	5,929	0.25%	0.54%	0.68%	2.67%	1.03%	61
Ocean Gate borough	Ocean	5,929	0.02%	0.00%	0.37%	0.02%	0.10%	6
Pine Beach borough	Ocean	5,929	0.05%	0.03%	0.63%	0.01%	0.18%	11
Plumsted township	Ocean	5,929	0.25%	0.45%	0.64%	0.01%	0.34%	20
Point Pleasant borough	Ocean	5,929	0.75%	0.00%	1.10%	0.23%	0.52%	31
Point Pleasant Beach bor.	Ocean	5,929	0.59%	0.74%	0.54%	0.24%	0.53%	31
Seaside Heights borough	Ocean	5,929	0.10%	0.00%	0.00%	0.00%	0.02%	1
Seaside Park borough	Ocean	5,929	0.03%	0.00%	0.28%	0.00%	0.08%	5
Ship Bottom borough	Ocean	5,929	0.09%	0.00%	0.32%	0.00%	0.10%	6
South Toms River borough	Ocean	5,929	0.08%	0.00%	0.39%	0.09%	0.14%	8
Stafford township	Ocean	5,929	1.56%	0.62%	1.13%	2.11%	1.35%	80
Surf City borough	Ocean	5,929	0.09%	0.12%	0.39%	0.00%	0.15%	9
Toms River township	Ocean	5,929	7.35%	0.07%	3.20%	4.64%	3.81%	226
Tuckerton borough	Ocean	5,929	0.20%	0.63%	0.36%	0.62%	0.45%	27
Bass River township	Burlington	7,511	0.04%	0.00%	0.38%	0.00%	0.11%	8
Beverly city	Burlington	7,511	0.06%	0.00%	0.27%	0.04%	0.09%	7

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Bordentown city	Burlington	7,511	0.27%	0.00%	0.60%	0.03%	0.23%	17
Bordentown township	Burlington	7,511	0.82%	0.00%	1.29%	1.79%	0.97%	73
Burlington city	Burlington	7,511	0.89%	0.00%	0.38%	0.15%	0.35%	27
Burlington township	Burlington	7,511	2.96%	3.38%	1.58%	3.78%	2.93%	220
Chesterfield township	Burlington	7,511	0.27%	0.00%	1.58%	0.00%	0.46%	35
Cinnaminson township	Burlington	7,511	1.79%	0.00%	1.76%	0.80%	1.08%	81
Delanco township	Burlington	7,511	0.24%	0.00%	0.72%	0.76%	0.43%	32
Delran township	Burlington	7,511	1.32%	4.10%	1.48%	0.78%	1.92%	144
Eastampton township	Burlington	7,511	0.58%	3.58%	0.65%	0.30%	1.28%	96
Edgewater Park township	Burlington	7,511	0.51%	2.11%	0.51%	0.72%	0.96%	72
Evesham township	Burlington	7,511	5.91%	11.05%	3.60%	1.68%	5.56%	418
Fieldsboro borough	Burlington	7,511	0.01%	0.00%	0.44%	0.04%	0.12%	9
Florence township	Burlington	7,511	0.61%	0.72%	1.15%	1.17%	0.91%	68
Hainesport township	Burlington	7,511	0.82%	1.59%	1.02%	0.99%	1.11%	83
Lumberton township	Burlington	7,511	1.24%	5.69%	1.36%	1.13%	2.36%	177
Mansfield township	Burlington	7,511	0.49%	1.49%	1.18%	1.82%	1.24%	93
Maple Shade township	Burlington	7,511	1.29%	1.35%	0.71%	0.16%	0.88%	66
Medford township	Burlington	7,511	1.89%	0.55%	2.89%	2.11%	1.86%	140
Medford Lakes borough	Burlington	7,511	0.07%	0.00%	1.35%	0.01%	0.36%	27
Moorestown township	Burlington	7,511	6.16%	2.49%	3.61%	1.46%	3.43%	258
Mount Holly township	Burlington	7,511	1.49%	0.00%	0.64%	0.31%	0.61%	46
Mount Laurel township	Burlington	7,511	8.34%	5.04%	3.54%	3.19%	5.03%	378
New Hanover township	Burlington	7,511	0.46%	2.45%	0.78%	0.00%	0.92%	69
North Hanover township	Burlington	7,511	0.22%	0.00%	0.50%	0.00%	0.18%	13
Palmyra borough	Burlington	7,511	0.39%	0.00%	0.62%	0.48%	0.37%	28
Pemberton borough	Burlington	7,511	0.04%	0.00%	0.44%	0.00%	0.12%	9
Pemberton township	Burlington	7,511	1.39%	0.00%	0.93%	0.92%	0.81%	61
Riverside township	Burlington	7,511	0.19%	0.00%	0.42%	0.11%	0.18%	14
Riverton borough	Burlington	7,511	0.13%	0.27%	0.99%	0.02%	0.35%	27
Shamong township	Burlington	7,511	0.19%	0.09%	1.31%	0.12%	0.43%	32
Southampton township	Burlington	7,511	0.54%	0.00%	0.60%	0.18%	0.33%	25
Springfield township	Burlington	7,511	0.30%	1.37%	1.05%	0.00%	0.68%	51
Tabernacle township	Burlington	7,511	0.25%	0.37%	1.25%	0.38%	0.56%	42
Washington township	Burlington	7,511	0.03%	0.00%	0.53%	0.00%	0.14%	11
Westampton township	Burlington	7,511	1.32%	2.20%	1.47%	3.46%	2.11%	159
Willingboro township	Burlington	7,511	1.46%	0.00%	1.29%	0.62%	0.84%	63
Woodland township	Burlington	7,511	0.26%	1.25%	0.70%	0.00%	0.55%	41
Wrightstown borough	Burlington	7,511	0.18%	0.85%	0.00%	0.00%	0.26%	20
Audubon borough	Camden	7,511	0.43%	0.00%	0.89%	0.02%	0.34%	25
Audubon Park borough	Camden	7,511	0.07%	0.36%	0.12%	0.00%	0.14%	10

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Barrington borough	Camden	7,511	0.32%	0.00%	0.64%	0.07%	0.26%	19
Bellmawr borough	Camden	7,511	0.88%	0.00%	0.40%	0.27%	0.39%	29
Berlin borough	Camden	7,511	0.90%	0.00%	0.98%	0.79%	0.67%	50
Berlin township	Camden	7,511	1.04%	1.42%	0.53%	1.11%	1.03%	77
Brooklawn borough	Camden	7,511	0.12%	0.43%	0.32%	0.02%	0.23%	17
Camden city	Camden	7,511	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cherry Hill township	Camden	7,511	12.48%	11.28%	5.46%	1.44%	7.66%	576
Chesilhurst borough	Camden	7,511	0.04%	0.12%	0.35%	0.26%	0.19%	14
Clementon borough	Camden	7,511	0.28%	0.73%	0.10%	0.14%	0.31%	23
Collingswood borough	Camden	7,511	0.80%	0.00%	0.72%	0.02%	0.39%	29
Gibbsboro borough	Camden	7,511	0.32%	0.00%	0.76%	0.51%	0.40%	30
Gloucester township	Camden	7,511	3.51%	5.40%	2.67%	4.73%	4.08%	306
Gloucester City	Camden	7,511	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haddon township	Camden	7,511	0.54%	0.81%	1.27%	0.09%	0.68%	51
Haddonfield borough	Camden	7,511	1.06%	0.59%	2.45%	0.07%	1.04%	78
Haddon Heights borough	Camden	7,511	0.44%	0.03%	1.21%	0.01%	0.42%	32
Hi-Nella borough	Camden	7,511	0.01%	0.00%	0.06%	0.03%	0.03%	2
Laurel Springs borough	Camden	7,511	0.05%	0.02%	0.83%	0.02%	0.23%	17
Lawnside borough	Camden	7,511	0.53%	0.00%	0.31%	0.43%	0.32%	24
Lindenwold borough	Camden	7,511	0.00%	0.00%	0.00%	0.00%	0.00%	0
Magnolia borough	Camden	7,511	0.20%	0.34%	0.35%	0.06%	0.24%	18
Merchantville borough	Camden	7,511	0.14%	0.00%	0.40%	0.01%	0.14%	10
Mount Ephraim borough	Camden	7,511	0.19%	0.00%	0.57%	0.04%	0.20%	15
Oaklyn borough	Camden	7,511	0.28%	0.94%	0.52%	0.01%	0.44%	33
Pennsauken township	Camden	7,511	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pine Hill borough	Camden	7,511	0.30%	0.00%	0.44%	0.99%	0.43%	32
Pine Valley borough	Camden	7,511	0.00%	0.00%	0.00%	0.73%	0.18%	14
Runnemede borough	Camden	7,511	0.57%	0.09%	0.41%	0.21%	0.32%	24
Somerdale borough	Camden	7,511	0.38%	0.40%	0.28%	0.08%	0.29%	22
Stratford borough	Camden	7,511	0.42%	0.00%	0.61%	0.04%	0.27%	20
Tavistock borough	Camden	7,511	0.03%	0.25%	0.00%	0.00%	0.07%	5
Voorhees township	Camden	7,511	4.02%	1.78%	2.57%	1.79%	2.54%	191
Waterford township	Camden	7,511	0.38%	0.00%	0.86%	0.67%	0.48%	36
Winslow township	Camden	7,511	1.54%	1.39%	1.84%	5.75%	2.63%	198
Woodlynne borough	Camden	7,511	0.04%	0.00%	0.04%	0.02%	0.03%	2
Clayton borough	Gloucester	7,511	0.27%	0.16%	0.54%	1.24%	0.55%	42
Deptford township	Gloucester	7,511	3.14%	0.00%	1.42%	5.75%	2.58%	194
East Greenwich township	Gloucester	7,511	0.40%	0.41%	1.66%	3.33%	1.45%	109
Elk township	Gloucester	7,511	0.15%	0.00%	0.78%	4.03%	1.24%	93
Franklin township	Gloucester	7,511	0.78%	0.10%	1.27%	3.60%	1.43%	108

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Glassboro borough	Gloucester	7,511	1.93%	3.30%	0.77%	1.88%	1.97%	148
Greenwich township	Gloucester	7,511	0.36%	0.26%	0.57%	1.19%	0.60%	45
Harrison township	Gloucester	7,511	0.61%	1.79%	2.23%	3.76%	2.10%	158
Logan township	Gloucester	7,511	2.01%	5.65%	0.93%	4.01%	3.15%	237
Mantua township	Gloucester	7,511	0.98%	1.92%	1.32%	2.89%	1.78%	133
Monroe township	Gloucester	7,511	1.46%	0.42%	1.66%	5.24%	2.19%	165
National Park borough	Gloucester	7,511	0.05%	0.00%	0.43%	0.06%	0.14%	10
Newfield borough	Gloucester	7,511	0.04%	0.00%	0.40%	0.00%	0.11%	8
Paulsboro borough	Gloucester	7,511	0.38%	1.21%	0.06%	0.17%	0.45%	34
Pitman borough	Gloucester	7,511	0.44%	0.00%	0.82%	0.07%	0.33%	25
South Harrison township	Gloucester	7,511	0.12%	0.04%	1.33%	0.01%	0.37%	28
Swedesboro borough	Gloucester	7,511	0.23%	0.46%	0.54%	0.08%	0.33%	25
Washington township	Gloucester	7,511	3.38%	3.61%	2.94%	4.22%	3.54%	266
Wenonah borough	Gloucester	7,511	0.06%	0.05%	1.10%	0.04%	0.31%	24
West Deptford township	Gloucester	7,511	2.49%	0.00%	1.20%	3.75%	1.86%	140
Westville borough	Gloucester	7,511	0.34%	0.00%	0.31%	0.06%	0.18%	13
Woodbury city	Gloucester	7,511	1.87%	1.94%	0.51%	0.24%	1.14%	86
Woodbury Heights borough	Gloucester	7,511	0.31%	0.29%	0.85%	0.19%	0.41%	31
Woolwich township	Gloucester	7,511	0.45%	0.00%	1.82%	4.27%	1.64%	123
Absecon city	Atlantic	650	1.81%	0.00%	1.73%	0.85%	1.10%	7
Atlantic City	Atlantic	650	0.00%	0.00%	0.00%	0.00%	0.00%	0
Brigantine city	Atlantic	650	1.05%	0.00%	2.36%	0.00%	0.85%	6
Buena borough	Atlantic	650	0.44%	0.00%	0.86%	0.20%	0.38%	2
Buena Vista township	Atlantic	650	1.21%	0.06%	1.07%	0.19%	0.63%	4
Corbin City	Atlantic	650	0.04%	0.00%	0.95%	0.00%	0.25%	2
Egg Harbor township	Atlantic	650	9.99%	17.92%	6.45%	10.74%	11.28%	73
Egg Harbor City	Atlantic	650	1.02%	0.00%	0.56%	0.36%	0.48%	3
Estell Manor city	Atlantic	650	0.14%	0.08%	1.21%	0.00%	0.36%	2
Folsom borough	Atlantic	650	0.45%	0.00%	1.03%	0.00%	0.37%	2
Galloway township	Atlantic	650	8.03%	17.36%	4.57%	9.60%	9.89%	64
Hamilton township	Atlantic	650	7.70%	7.26%	3.26%	5.39%	5.90%	38
Hammonton town	Atlantic	650	4.79%	0.00%	2.33%	3.62%	2.69%	17
Linwood city	Atlantic	650	2.04%	0.00%	3.07%	0.33%	1.36%	9
Longport borough	Atlantic	650	0.06%	0.10%	1.47%	0.03%	0.41%	3
Margate City	Atlantic	650	1.11%	1.43%	2.76%	0.07%	1.34%	9
Mullica township	Atlantic	650	0.72%	1.80%	1.66%	0.31%	1.12%	7
Northfield city	Atlantic	650	2.69%	0.00%	2.07%	0.62%	1.34%	9
Pleasantville city	Atlantic	650	0.00%	0.00%	0.00%	0.00%	0.00%	0
Port Republic city	Atlantic	650	0.09%	0.30%	1.46%	0.01%	0.47%	3
Somers Point city	Atlantic	650	4.36%	0.00%	1.31%	0.17%	1.46%	9

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Ventnor City	Atlantic	650	1.07%	0.00%	2.02%	0.04%	0.78%	5
Weymouth township	Atlantic	650	0.17%	0.20%	0.91%	0.00%	0.32%	2
Avalon borough	Cape May	650	0.59%	0.47%	2.09%	0.00%	0.79%	5
Cape May city	Cape May	650	1.69%	5.88%	0.83%	0.00%	2.10%	14
Cape May Point borough	Cape May	650	0.01%	0.00%	0.90%	0.00%	0.23%	1
Dennis township	Cape May	650	1.15%	1.63%	1.86%	2.15%	1.70%	11
Lower township	Cape May	650	2.90%	0.00%	2.78%	1.20%	1.72%	11
Middle township	Cape May	650	6.91%	2.77%	2.86%	3.26%	3.95%	26
North Wildwood city	Cape May	650	0.52%	0.11%	0.87%	0.00%	0.37%	2
Ocean City	Cape May	650	3.23%	0.00%	2.81%	0.00%	1.51%	10
Sea Isle City	Cape May	650	0.47%	0.00%	1.02%	0.00%	0.37%	2
Stone Harbor borough	Cape May	650	0.37%	0.00%	1.10%	0.00%	0.37%	2
Upper township	Cape May	650	2.31%	0.00%	3.13%	5.07%	2.63%	17
West Cape May borough	Cape May	650	0.15%	0.06%	0.55%	0.00%	0.19%	1
West Wildwood borough	Cape May	650	0.02%	0.02%	0.54%	0.00%	0.14%	1
Wildwood city	Cape May	650	1.51%	0.00%	0.24%	0.00%	0.44%	3
Wildwood Crest borough	Cape May	650	0.41%	0.00%	1.54%	0.00%	0.49%	3
Woodbine borough	Cape May	650	0.35%	1.60%	0.28%	1.59%	0.96%	6
Bridgeton city	Cumberland	650	0.00%	0.00%	0.00%	0.00%	0.00%	0
Commercial township	Cumberland	650	0.30%	0.00%	0.77%	0.00%	0.27%	2
Deerfield township	Cumberland	650	0.98%	3.09%	1.34%	0.00%	1.35%	9
Downe township	Cumberland	650	0.14%	0.29%	0.56%	0.00%	0.25%	2
Fairfield township	Cumberland	650	1.32%	4.13%	0.73%	4.78%	2.74%	18
Greenwich township	Cumberland	650	0.02%	0.00%	1.11%	0.00%	0.28%	2
Hopewell township	Cumberland	650	0.83%	0.00%	1.28%	7.15%	2.31%	15
Lawrence township	Cumberland	650	0.28%	0.00%	1.35%	0.00%	0.41%	3
Maurice River township	Cumberland	650	0.58%	2.00%	1.22%	0.00%	0.95%	6
Millville city	Cumberland	650	6.64%	0.00%	2.33%	7.17%	4.04%	26
Shiloh borough	Cumberland	650	0.02%	0.00%	1.29%	0.00%	0.33%	2
Stow Creek township	Cumberland	650	0.11%	0.00%	1.16%	0.00%	0.32%	2
Upper Deerfield township	Cumberland	650	2.55%	7.41%	1.33%	6.30%	4.40%	29
Vineland city	Cumberland	650	0.00%	0.00%	0.00%	0.00%	0.00%	0
Alloway township	Salem	650	0.49%	0.51%	1.73%	0.00%	0.68%	4
Cameys Point township	Salem	650	2.37%	5.54%	1.22%	9.87%	4.75%	31
Elmer borough	Salem	650	0.60%	2.80%	1.00%	0.00%	1.10%	7
Elsinboro township	Salem	650	0.06%	0.16%	1.02%	0.00%	0.31%	2
Lower Alloways Creek twp	Salem	650	1.94%	6.77%	1.12%	0.00%	2.46%	16
Mannington township	Salem	650	1.02%	1.64%	1.08%	0.00%	0.94%	6
Oldmans township	Salem	650	0.57%	0.92%	1.32%	12.60%	3.85%	25
Penns Grove borough	Salem	650	0.00%	0.00%	0.00%	0.00%	0.00%	0

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Allocated Prospective Need
Pennsville township	Salem	650	2.37%	0.00%	2.16%	5.16%	2.42%	16
Pilesgrove township	Salem	650	1.28%	5.70%	1.90%	1.15%	2.51%	16
Pittsgrove township	Salem	650	1.33%	0.00%	2.43%	0.00%	0.94%	6
Quinton township	Salem	650	0.22%	0.00%	1.05%	0.00%	0.32%	2
Salem city	Salem	650	1.05%	0.00%	0.00%	0.00%	0.26%	2
Upper Pittsgrove township	Salem	650	0.72%	0.00%	1.43%	0.00%	0.54%	3
Woodstown borough	Salem	650	0.62%	0.00%	1.51%	0.00%	0.53%	3

APPENDIX C: SECONDARY SOURCE ADJUSTMENTS TO MUNICIPAL ALLOCATIONS

TABLE C.1: SECONDARY SOURCE ADJUSTMENTS TO MUNICIPAL ALLOCATIONS

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Allendale borough	Bergen	1	(5)	4	26	25	(5)	14	81
Alpine borough	Bergen	1	(21)	0	0	(21)	(8)	2	148
Bergenfield borough	Bergen	1	(37)	64	156	183	(3)	60	0
Bogota borough	Bergen	1	(2)	21	132	151	0	0	0
Carlstadt borough	Bergen	1	(19)	46	(7)	20	(7)	32	89
Cliffside Park borough	Bergen	1	(108)	109	173	174	(1)	11	0
Closter borough	Bergen	1	(66)	7	25	(34)	(7)	0	126
Cresskill borough	Bergen	1	(29)	2	12	(15)	(18)	40	290
Demarest borough	Bergen	1	(38)	3	1	(34)	(6)	0	106
Dumont borough	Bergen	1	(38)	32	153	147	0	3	0
East Rutherford borough	Bergen	1	(11)	63	34	86	(10)	175	12
Edgewater borough	Bergen	1	(40)	22	90	72	(12)	0	213
Elmwood Park borough	Bergen	1	(12)	119	78	185	(3)	40	7
Emerson borough	Bergen	1	(14)	4	49	39	(7)	53	64
Englewood city	Bergen	1	(39)	78	276	315	(14)	247	0
Englewood Cliffs borough	Bergen	1	(70)	1	0	(69)	(16)	0	294
Fair Lawn borough	Bergen	1	(26)	58	345	377	(6)	108	0
Fairview borough	Bergen	1	(45)	95	72	122	(6)	115	0
Fort Lee borough	Bergen	1	(99)	83	9	(7)	(23)	248	158
Franklin Lakes borough	Bergen	1	(71)	1	2	(68)	(23)	30	377
Garfield city	Bergen	1	(30)	279	5	254	0	0	0
Glen Rock borough	Bergen	1	(6)	3	80	77	(3)	13	48
Hackensack city	Bergen	1	(65)	149	619	703	0	0	0
Harrington Park borough	Bergen	1	(17)	4	29	16	(6)	4	104
Hasbrouck Heights borough	Bergen	1	(22)	28	77	83	(18)	64	262
Haworth borough	Bergen	1	(14)	0	38	24	(2)	0	43
Hillsdale borough	Bergen	1	(16)	8	44	36	(5)	13	80
Ho-Ho-Kus borough	Bergen	1	(13)	2	3	(8)	(6)	10	100
Leonia borough	Bergen	1	(61)	19	(3)	(45)	(11)	71	124
Little Ferry borough	Bergen	1	(5)	45	136	176	(1)	23	0
Lodi borough	Bergen	1	(28)	189	(68)	93	(3)	63	0
Lyndhurst township	Bergen	1	(15)	141	79	205	(8)	151	0
Mahwah township	Bergen	1	(26)	20	204	198	(8)	64	86
Maywood borough	Bergen	1	(26)	32	57	63	(2)	25	3
Midland Park borough	Bergen	1	(7)	14	13	20	(3)	23	34
Montvale borough	Bergen	1	(15)	10	6	1	(17)	2	303
Moonachie borough	Bergen	1	(5)	3	34	32	(4)	28	35

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
New Milford borough	Bergen	1	(21)	48	58	85	(2)	36	8
North Arlington borough	Bergen	1	(7)	99	79	171	(4)	67	0
Northvale borough	Bergen	1	(12)	8	6	2	(3)	3	53
Norwood borough	Bergen	1	(20)	6	7	(7)	(4)	0	71
Oakland borough	Bergen	1	(16)	2	94	80	(3)	24	29
Old Tappan borough	Bergen	1	(40)	3	3	(34)	(15)	9	257
Oradell borough	Bergen	1	(10)	4	80	74	(2)	14	18
Palisades Park borough	Bergen	1	(142)	109	(6)	(39)	(11)	125	80
Paramus borough	Bergen	1	(83)	17	15	(51)	(37)	133	529
Park Ridge borough	Bergen	1	(27)	16	42	31	(10)	108	66
Ramsey borough	Bergen	1	(21)	17	117	113	(8)	50	86
Ridgefield borough	Bergen	1	(41)	61	(19)	1	(11)	133	74
Ridgefield Park village	Bergen	1	(1)	59	117	175	(2)	29	0
Ridgewood village	Bergen	1	(31)	32	63	64	(14)	4	244
River Edge borough	Bergen	1	(6)	20	152	166	(1)	24	0
River Vale township	Bergen	1	(25)	4	44	23	(5)	19	78
Rochelle Park township	Bergen	1	(2)	15	25	38	(1)	0	17
Rockleigh borough	Bergen	1	(1)	0	0	(1)	(11)	0	190
Rutherford borough	Bergen	1	(22)	56	73	107	(15)	159	115
Saddle Brook township	Bergen	1	(20)	49	85	114	(2)	36	8
Saddle River borough	Bergen	1	(37)	2	0	(35)	(18)	43	277
South Hackensack township	Bergen	1	(4)	18	(12)	2	(6)	55	48
Teaneck township	Bergen	1	(54)	38	449	433	(26)	79	390
Tenafly borough	Bergen	1	(91)	19	6	(66)	(12)	21	202
Teterboro borough	Bergen	1	0	1	0	1	(6)	0	101
Upper Saddle River borough	Bergen	1	(66)	3	10	(53)	(17)	7	308
Waldwick borough	Bergen	1	(10)	8	107	105	(2)	41	0
Wallington borough	Bergen	1	(8)	88	83	163	0	0	0
Washington township	Bergen	1	(10)	2	72	64	(9)	0	156
Westwood borough	Bergen	1	(11)	24	41	54	(4)	50	23
Woodcliff Lake borough	Bergen	1	(18)	0	7	(11)	(15)	16	257
Wood-Ridge borough	Bergen	1	(13)	21	159	167	0	0	0
Wyckoff township	Bergen	1	(38)	5	25	(8)	(14)	31	225
Bayonne city	Hudson	1	(14)	785	(1,538)	(767)	(85)	845	682
East Newark borough	Hudson	1	(1)	35	(47)	(13)	(2)	8	20
Guttenberg town	Hudson	1	(33)	100	230	297	0	0	0
Harrison town	Hudson	1	(41)	186	(399)	(254)	(36)	248	397
Hoboken city	Hudson	1	(47)	289	106	348	0	0	0
Jersey City	Hudson	1	(551)	2,281	(3,251)	(1,521)	(310)	4,372	1,211
Kearny town	Hudson	1	(34)	406	(641)	(269)	(39)	227	481
North Bergen township	Hudson	1	(37)	540	(689)	(186)	(52)	793	134
Secaucus town	Hudson	1	(22)	121	(203)	(104)	(25)	54	399
Union City	Hudson	1	(103)	552	(69)	380	(71)	1,271	0

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Weehawken township	Hudson	1	(5)	144	(5)	134	(3)	54	0
West New York town	Hudson	1	(30)	298	74	342	(23)	405	0
Bloomington borough	Passaic	1	(6)	18	27	39	(3)	56	0
Clifton city	Passaic	1	(28)	575	337	884	(66)	1,182	0
Haledon borough	Passaic	1	(4)	73	71	140	0	0	0
Hawthorne borough	Passaic	1	(7)	136	66	195	(2)	34	0
Little Falls township	Passaic	1	(25)	54	69	98	(11)	152	42
North Haledon borough	Passaic	1	(7)	14	12	19	(6)	0	115
Passaic city	Passaic	1	(44)	449	77	482	(288)	5,170	0
Paterson city	Passaic	1	(432)	1,533	790	1,891	(117)	2,110	0
Pompton Lakes borough	Passaic	1	(22)	26	228	232	0	0	0
Prospect Park borough	Passaic	1	(1)	83	158	240	0	0	0
Ringwood borough	Passaic	1	(9)	3	142	136	0	0	0
Totowa borough	Passaic	1	(1)	47	10	56	(16)	137	147
Wanaque borough	Passaic	1	(6)	23	167	184	0	4	0
Wayne township	Passaic	1	(55)	46	255	246	(47)	272	567
West Milford township	Passaic	1	(2)	13	390	401	0	0	0
Woodland Park borough	Passaic	1	(6)	71	(30)	35	(20)	246	116
Andover borough	Sussex	1	(1)	2	214	215	0	0	0
Andover township	Sussex	1	(10)	3	122	115	(11)	7	183
Branchville borough	Sussex	1	(1)	4	(4)	(1)	(11)	1	189
Byram township	Sussex	1	(5)	3	67	65	(4)	28	43
Frankford township	Sussex	1	(20)	2	5	(13)	(4)	31	49
Franklin borough	Sussex	1	(8)	9	135	136	0	1	0
Fredon township	Sussex	1	(2)	0	8	6	(7)	23	99
Green township	Sussex	1	(1)	0	61	60	0	0	0
Hamburg borough	Sussex	1	(2)	2	117	117	0	0	0
Hampton township	Sussex	1	(2)	2	(1)	(1)	(2)	8	35
Hardyston township	Sussex	1	(10)	7	167	164	(23)	20	399
Hopatcong borough	Sussex	1	(18)	6	209	197	0	0	0
Lafayette township	Sussex	1	(3)	2	2	1	(5)	0	89
Montague township	Sussex	1	(2)	10	78	86	0	0	0
Newton town	Sussex	1	(1)	20	(136)	(117)	(17)	172	131
Ogdensburg borough	Sussex	1	(1)	3	43	45	0	0	0
Sandyston township	Sussex	1	(1)	0	59	58	0	0	0
Sparta township	Sussex	1	(19)	9	368	358	0	0	0
Stanhope borough	Sussex	1	(3)	7	154	158	0	0	0
Stillwater township	Sussex	1	(2)	2	34	34	(1)	0	23
Sussex borough	Sussex	1	(4)	9	5	10	0	0	0
Vernon township	Sussex	1	(22)	6	374	358	(3)	43	8
Walpack township	Sussex	1	0	0	0	0	0	0	1
Wantage township	Sussex	1	(8)	8	110	110	0	0	0
Belleville township	Essex	2	(19)	86	879	946	(62)	101	0

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Bloomfield township	Essex	2	(15)	114	886	985	0	0	0
Caldwell borough	Essex	2	(6)	17	(2)	9	(13)	14	7
Cedar Grove township	Essex	2	(6)	9	57	60	(24)	15	24
City of Orange township	Essex	2	(186)	84	1,162	1,060	(24)	38	0
East Orange city	Essex	2	(289)	172	2,190	2,073	0	0	0
Essex Fells borough	Essex	2	(7)	0	0	(7)	(23)	0	38
Fairfield township	Essex	2	(11)	2	55	46	(71)	45	71
Glen Ridge borough	Essex	2	(1)	2	91	92	0	0	0
Irvington township	Essex	2	(78)	189	2,320	2,431	0	0	0
Livingston township	Essex	2	(38)	2	176	140	(58)	14	80
Maplewood township	Essex	2	0	26	348	374	0	0	0
Millburn township	Essex	2	(120)	11	0	(109)	(252)	137	274
Montclair township	Essex	2	(20)	67	154	201	0	0	0
Newark city	Essex	2	(1,026)	935	5,631	5,540	0	0	0
North Caldwell borough	Essex	2	(8)	1	74	67	(32)	34	19
Nutley township	Essex	2	(31)	42	242	253	(87)	141	0
Roseland borough	Essex	2	(5)	2	28	25	(30)	0	49
S. Orange Village township	Essex	2	(1)	6	89	94	(126)	0	207
Verona township	Essex	2	(15)	12	98	95	0	0	0
West Caldwell township	Essex	2	(5)	1	22	18	(60)	46	51
West Orange township	Essex	2	(5)	64	492	551	(52)	84	0
Boonton town	Morris	2	(6)	8	63	65	(10)	16	0
Boonton township	Morris	2	(5)	0	43	38	(21)	23	10
Butler borough	Morris	2	(3)	5	152	154	0	0	0
Chatham borough	Morris	2	(24)	2	15	(7)	(38)	0	62
Chatham township	Morris	2	(57)	1	2	(54)	(161)	56	208
Chester borough	Morris	2	(2)	0	(1)	(3)	(37)	11	50
Chester township	Morris	2	(6)	0	53	47	(22)	28	8
Denville township	Morris	2	(35)	1	271	237	0	0	0
Dover town	Morris	2	(8)	14	169	175	(60)	99	0
East Hanover township	Morris	2	(37)	2	21	(14)	(84)	35	101
Florham Park borough	Morris	2	(46)	2	17	(27)	(352)	68	506
Hanover township	Morris	2	(24)	2	87	65	(78)	28	99
Harding township	Morris	2	(17)	0	0	(17)	(66)	0	107
Jefferson township	Morris	2	(41)	2	390	351	0	0	0
Kinnelon borough	Morris	2	(8)	1	55	48	(17)	0	28
Lincoln Park borough	Morris	2	(6)	4	107	105	(22)	10	26
Long Hill township	Morris	2	(13)	1	26	14	(19)	14	16
Madison borough	Morris	2	(46)	7	23	(16)	(47)	5	71
Mendham borough	Morris	2	(6)	2	23	19	(26)	10	33
Mendham township	Morris	2	(10)	0	2	(8)	(56)	23	68
Mine Hill township	Morris	2	(12)	0	133	121	0	0	0
Montville township	Morris	2	(39)	2	110	73	(41)	17	49

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Morris township	Morris	2	(23)	3	98	78	(197)	28	294
Morris Plains borough	Morris	2	(7)	1	38	32	(25)	32	9
Morristown town	Morris	2	(19)	16	1	(2)	(111)	140	41
Mountain Lakes borough	Morris	2	(12)	0	2	(10)	(30)	1	47
Mount Arlington borough	Morris	2	(9)	2	89	82	0	1	0
Mount Olive township	Morris	2	(16)	9	853	846	0	0	0
Netcong borough	Morris	2	(3)	2	110	109	0	0	0
Parsippany-Troy Hills twp	Morris	2	(78)	8	861	791	0	0	0
Pequanock township	Morris	2	(38)	2	72	36	(50)	76	5
Randolph township	Morris	2	(25)	4	380	359	0	0	0
Riverdale borough	Morris	2	(6)	1	299	294	0	0	0
Rockaway borough	Morris	2	(3)	3	23	23	(33)	17	38
Rockaway township	Morris	2	(28)	3	472	447	0	0	0
Roxbury township	Morris	2	(26)	4	620	598	0	0	0
Victory Gardens borough	Morris	2	0	1	163	164	0	0	0
Washington township	Morris	2	(4)	1	105	102	(10)	10	7
Wharton borough	Morris	2	(15)	4	77	66	(52)	85	0
Berkeley Heights township	Union	2	(23)	3	43	23	(123)	9	193
Clark township	Union	2	(17)	4	(101)	(114)	(97)	37	122
Cranford township	Union	2	(10)	15	(28)	(23)	(99)	98	64
Elizabeth city	Union	2	(435)	349	(1,020)	(1,106)	(2,601)	4,247	0
Fanwood borough	Union	2	(8)	0	13	5	(23)	17	20
Garwood borough	Union	2	(2)	10	(93)	(85)	(58)	40	56
Hillside township	Union	2	(19)	37	(65)	(47)	(125)	203	0
Kenilworth borough	Union	2	(16)	7	(13)	(22)	(36)	0	58
Linden city	Union	2	(57)	86	(221)	(192)	(359)	470	117
Mountainside borough	Union	2	(15)	1	10	(4)	(87)	138	4
New Providence borough	Union	2	(10)	11	26	27	(57)	63	31
Plainfield city	Union	2	(39)	75	273	309	(247)	403	0
Rahway city	Union	2	(65)	38	(202)	(229)	(131)	115	98
Roselle borough	Union	2	(3)	34	60	91	(66)	108	0
Roselle Park borough	Union	2	(9)	19	(176)	(166)	(104)	81	88
Scotch Plains township	Union	2	(81)	8	7	(66)	(114)	101	85
Springfield township	Union	2	(8)	14	(34)	(28)	(47)	0	78
Summit city	Union	2	(45)	17	4	(24)	(183)	172	127
Union township	Union	2	(10)	61	(389)	(338)	(376)	410	203
Westfield town	Union	2	(134)	17	17	(100)	(132)	76	140
Winfield township	Union	2	0	5	0	5	(17)	22	7
Allamuchy township	Warren	2	(1)	1	36	36	(46)	55	19
Alpha borough	Warren	2	0	2	39	41	(4)	7	0
Belvidere town	Warren	2	(1)	3	56	58	0	1	0
Blairstown township	Warren	2	(6)	1	25	20	(2)	0	3
Franklin township	Warren	2	(3)	0	39	36	(2)	0	4

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Frelinghuysen township	Warren	2	(1)	0	49	48	(31)	0	51
Greenwich township	Warren	2	(4)	2	80	78	(14)	0	24
Hackettstown town	Warren	2	(3)	8	(165)	(160)	(138)	135	90
Hardwick township	Warren	2	0	0	39	39	0	0	0
Harmony township	Warren	2	(13)	0	53	40	0	0	0
Hope township	Warren	2	(1)	0	37	36	0	0	0
Independence township	Warren	2	(2)	1	48	47	0	0	0
Knowlton township	Warren	2	(4)	0	58	54	0	0	0
Liberty township	Warren	2	(13)	0	88	75	0	0	0
Lopatcong township	Warren	2	(2)	2	163	163	0	0	0
Mansfield township	Warren	2	(8)	5	(44)	(47)	(73)	20	100
Oxford township	Warren	2	(1)	1	140	140	0	0	0
Phillipsburg town	Warren	2	(14)	21	458	465	0	0	0
Pohatcong township	Warren	2	(7)	1	106	100	(5)	8	0
Washington borough	Warren	2	(4)	9	37	42	0	0	0
Washington township	Warren	2	(6)	0	162	156	0	0	0
White township	Warren	2	(16)	1	31	16	(68)	60	51
Alexandria township	Hunterdon	3	(4)	2	46	44	(3)	25	0
Bethlehem township	Hunterdon	3	(5)	0	110	105	0	0	0
Bloomsbury borough	Hunterdon	3	0	1	245	246	0	0	0
Califon borough	Hunterdon	3	(1)	0	116	115	0	0	0
Clinton town	Hunterdon	3	0	6	87	93	0	0	0
Clinton township	Hunterdon	3	(10)	10	214	214	0	0	0
Delaware township	Hunterdon	3	(4)	3	29	28	(2)	20	0
East Amwell township	Hunterdon	3	(4)	1	46	43	0	0	0
Flemington borough	Hunterdon	3	(2)	26	(65)	(41)	(14)	77	43
Franklin township	Hunterdon	3	(3)	2	(48)	(49)	(7)	0	59
Frenchtown borough	Hunterdon	3	(1)	6	120	125	0	0	0
Glen Gardner borough	Hunterdon	3	(2)	5	180	183	0	0	0
Hampton borough	Hunterdon	3	(2)	4	117	119	0	0	0
High Bridge borough	Hunterdon	3	(2)	5	176	179	0	0	0
Holland township	Hunterdon	3	(2)	3	65	66	(5)	45	0
Kingwood township	Hunterdon	3	(5)	4	107	106	0	0	0
Lambertville city	Hunterdon	3	(10)	19	19	28	(7)	58	0
Lebanon borough	Hunterdon	3	(2)	5	136	139	0	0	0
Lebanon township	Hunterdon	3	(7)	4	87	84	0	0	0
Milford borough	Hunterdon	3	(1)	3	257	259	0	0	0
Raritan township	Hunterdon	3	(24)	7	198	181	(6)	34	13
Readington township	Hunterdon	3	(24)	6	208	190	(33)	130	153
Stockton borough	Hunterdon	3	(1)	2	121	122	0	0	0
Tewksbury township	Hunterdon	3	(5)	1	26	22	(5)	0	42
Union township	Hunterdon	3	(6)	3	(197)	(200)	(24)	1	207
West Amwell township	Hunterdon	3	(7)	2	5	0	(2)	0	19

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Carteret borough	Middlesex	3	(19)	98	(312)	(233)	(37)	117	196
Cranbury township	Middlesex	3	(10)	5	12	7	(10)	3	81
Dunellen borough	Middlesex	3	(11)	38	(82)	(55)	(7)	1	61
East Brunswick township	Middlesex	3	(4)	29	(282)	(257)	(60)	90	417
Edison township	Middlesex	3	(104)	127	(433)	(410)	(154)	647	659
Helmetta borough	Middlesex	3	0	0	74	74	0	0	0
Highland Park borough	Middlesex	3	(12)	96	(551)	(467)	(60)	79	433
Jamesburg borough	Middlesex	3	(8)	26	(88)	(70)	(17)	37	104
Metuchen borough	Middlesex	3	(41)	27	(39)	(53)	(24)	81	118
Middlesex borough	Middlesex	3	(22)	22	(172)	(172)	(30)	77	178
Milltown borough	Middlesex	3	(1)	24	(36)	(13)	(8)	39	31
Monroe township	Middlesex	3	(17)	47	(1,318)	(1,288)	(195)	106	1,546
New Brunswick city	Middlesex	3	(166)	262	(306)	(210)	(184)	1,539	26
North Brunswick township	Middlesex	3	(20)	86	(152)	(86)	(52)	223	218
Old Bridge township	Middlesex	3	(37)	123	(437)	(351)	(84)	210	500
Perth Amboy city	Middlesex	3	(35)	361	(87)	239	(54)	455	0
Piscataway township	Middlesex	3	(32)	92	(195)	(135)	(70)	317	277
Plainsboro township	Middlesex	3	(6)	52	(435)	(389)	(64)	6	539
Sayreville borough	Middlesex	3	(21)	57	(220)	(184)	(49)	150	267
South Amboy city	Middlesex	3	(7)	34	(23)	4	(7)	41	16
South Brunswick township	Middlesex	3	(25)	44	33	52	(43)	130	237
South Plainfield borough	Middlesex	3	(23)	23	(175)	(175)	(42)	56	305
South River borough	Middlesex	3	(8)	58	(244)	(194)	(41)	175	173
Spotswood borough	Middlesex	3	(5)	9	(95)	(91)	(13)	12	100
Woodbridge township	Middlesex	3	(85)	154	(633)	(564)	(140)	417	775
Bedminster township	Somerset	3	(7)	11	(30)	(26)	(11)	1	97
Bernards township	Somerset	3	(37)	18	56	37	(53)	34	411
Bernardsville borough	Somerset	3	(21)	9	(13)	(25)	(8)	0	69
Bound Brook borough	Somerset	3	(8)	47	60	99	0	0	0
Branchburg township	Somerset	3	(13)	4	211	202	(3)	2	25
Bridgewater township	Somerset	3	(53)	30	187	164	(24)	126	76
Far Hills borough	Somerset	3	0	1	1	2	(3)	2	19
Franklin township	Somerset	3	(62)	73	640	651	0	0	0
Green Brook township	Somerset	3	(5)	2	111	108	(1)	4	0
Hillsborough township	Somerset	3	(10)	14	430	434	(7)	57	0
Manville borough	Somerset	3	(21)	41	(27)	(7)	(20)	169	0
Millstone borough	Somerset	3	(1)	0	(36)	(37)	(6)	0	47
Montgomery township	Somerset	3	(22)	5	81	64	(28)	76	157
North Plainfield borough	Somerset	3	(2)	70	211	279	(6)	50	0
Peapack & Gladstone bor.	Somerset	3	(5)	4	118	117	0	0	0
Raritan borough	Somerset	3	(4)	32	(83)	(55)	(15)	41	83
Rocky Hill borough	Somerset	3	(1)	1	(4)	(4)	(2)	0	17
Somerville borough	Somerset	3	(5)	47	(36)	6	(15)	109	14

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
South Bound Brook borough	Somerset	3	(4)	15	78	89	0	0	0
Warren township	Somerset	3	(33)	2	11	(20)	(27)	59	173
Watchung borough	Somerset	3	(22)	1	(2)	(23)	(14)	19	101
East Windsor township	Mercer	4	(9)	23	34	48	(66)	65	20
Ewing township	Mercer	4	(14)	38	75	99	(179)	128	101
Hamilton township	Mercer	4	(68)	121	(743)	(690)	(701)	539	358
Hightstown borough	Mercer	4	(7)	12	27	32	(12)	16	0
Hopewell borough	Mercer	4	(6)	4	(27)	(29)	(26)	18	16
Hopewell township	Mercer	4	(18)	8	163	153	(80)	0	102
Lawrence township	Mercer	4	(16)	30	(28)	(14)	(92)	60	58
Pennington borough	Mercer	4	(2)	3	(2)	(1)	(43)	55	0
Princeton	Mercer	4	(65)	55	5	(5)	(147)	91	98
Robbinsville township	Mercer	4	(11)	2	3	(6)	(65)	20	64
Trenton city	Mercer	4	(215)	280	872	937	(58)	73	0
West Windsor township	Mercer	4	(22)	15	148	141	(82)	105	0
Aberdeen township	Monmouth	4	(24)	10	682	668	0	0	0
Allenhurst borough	Monmouth	4	(6)	2	0	(4)	(7)	4	6
Allentown borough	Monmouth	4	(1)	2	122	123	0	0	0
Asbury Park city	Monmouth	4	(49)	64	(268)	(253)	(225)	260	28
Atlantic Highlands borough	Monmouth	4	(3)	5	(27)	(25)	(49)	62	0
Avon-by-the-Sea borough	Monmouth	4	(33)	6	(1)	(28)	(16)	0	20
Belmar borough	Monmouth	4	(59)	25	(175)	(209)	(120)	54	100
Bradley Beach borough	Monmouth	4	(23)	25	(91)	(89)	(50)	13	51
Brielle borough	Monmouth	4	(34)	7	36	9	(13)	11	6
Colts Neck township	Monmouth	4	(21)	5	14	(2)	(24)	14	16
Deal borough	Monmouth	4	(17)	1	0	(16)	(13)	2	14
Eatontown borough	Monmouth	4	(28)	31	(86)	(83)	(117)	116	34
Englishtown borough	Monmouth	4	(2)	3	144	145	0	0	0
Fair Haven borough	Monmouth	4	(35)	1	11	(23)	(21)	0	27
Farmingdale borough	Monmouth	4	(2)	2	(10)	(10)	(8)	2	9
Freehold borough	Monmouth	4	(2)	16	133	147	(61)	78	0
Freehold township	Monmouth	4	(9)	12	309	312	0	0	0
Hazlet township	Monmouth	4	(17)	3	141	127	0	0	0
Highlands borough	Monmouth	4	(23)	12	310	299	0	0	0
Holmdel township	Monmouth	4	(9)	1	68	60	(15)	19	0
Howell township	Monmouth	4	(38)	14	711	687	0	0	0
Interlaken borough	Monmouth	4	(1)	0	1	0	(8)	3	7
Keansburg borough	Monmouth	4	(35)	20	665	650	0	0	0
Keyport borough	Monmouth	4	(12)	17	24	29	0	0	0
Lake Como borough	Monmouth	4	(23)	4	(69)	(88)	(43)	3	51
Little Silver borough	Monmouth	4	(19)	0	24	5	(14)	7	10
Loch Arbour village	Monmouth	4	(2)	0	0	(2)	(6)	0	8
Long Branch city	Monmouth	4	(54)	90	(813)	(777)	(478)	311	299

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Manalapan township	Monmouth	4	(25)	12	307	294	0	0	0
Manasquan borough	Monmouth	4	(100)	17	(6)	(89)	(47)	0	59
Marlboro township	Monmouth	4	(26)	8	585	567	0	0	0
Matawan borough	Monmouth	4	(6)	9	120	123	0	0	0
Middletown township	Monmouth	4	(106)	23	793	710	0	0	0
Millstone township	Monmouth	4	(20)	0	89	69	0	0	0
Monmouth Beach borough	Monmouth	4	(25)	2	(20)	(43)	(25)	0	32
Neptune township	Monmouth	4	(34)	43	20	29	(57)	73	0
Neptune City borough	Monmouth	4	(6)	8	(25)	(23)	(32)	13	27
Ocean township	Monmouth	4	(30)	22	(20)	(28)	(79)	81	19
Oceanport borough	Monmouth	4	(15)	4	20	9	(17)	0	22
Red Bank borough	Monmouth	4	(20)	44	(72)	(48)	(98)	126	0
Roosevelt borough	Monmouth	4	(2)	1	346	345	0	0	0
Rumson borough	Monmouth	4	(102)	1	0	(101)	(73)	26	67
Sea Bright borough	Monmouth	4	(10)	6	(36)	(40)	(27)	11	23
Sea Girt borough	Monmouth	4	(57)	1	0	(56)	(36)	0	45
Shrewsbury borough	Monmouth	4	(4)	0	(6)	(10)	(24)	10	20
Shrewsbury township	Monmouth	4	(10)	2	267	259	0	0	0
Spring Lake borough	Monmouth	4	(65)	2	0	(63)	(41)	12	41
Spring Lake Heights bor.	Monmouth	4	(33)	9	(96)	(120)	(66)	20	65
Tinton Falls borough	Monmouth	4	(21)	5	229	213	(6)	7	0
Union Beach borough	Monmouth	4	(25)	5	324	304	0	0	0
Upper Freehold township	Monmouth	4	(13)	0	43	30	(18)	23	0
Wall township	Monmouth	4	(78)	14	36	(28)	(143)	105	78
West Long Branch borough	Monmouth	4	(10)	7	(10)	(13)	(25)	14	18
Barnegat township	Ocean	4	(13)	7	35	29	(55)	63	7
Barnegat Light borough	Ocean	4	(6)	8	0	2	(9)	12	0
Bay Head borough	Ocean	4	(15)	2	0	(13)	(10)	1	12
Beach Haven borough	Ocean	4	(66)	31	(3)	(38)	(23)	3	27
Beachwood borough	Ocean	4	(18)	4	128	114	0	0	0
Berkeley township	Ocean	4	(76)	15	1,612	1,551	0	0	0
Brick township	Ocean	4	(226)	39	243	56	(205)	262	0
Eagleswood township	Ocean	4	(6)	1	32	27	(4)	0	5
Harvey Cedars borough	Ocean	4	(9)	8	0	(1)	(6)	3	4
Island Heights borough	Ocean	4	(8)	1	(27)	(34)	(21)	3	23
Jackson township	Ocean	4	(17)	20	100	103	(101)	56	74
Lacey township	Ocean	4	(66)	5	131	70	(37)	48	0
Lakehurst borough	Ocean	4	(1)	5	77	81	0	0	0
Lakewood township	Ocean	4	(228)	123	(1,047)	(1,152)	(740)	533	412
Lavallette borough	Ocean	4	(81)	34	(4)	(51)	(25)	0	33
Little Egg Harbor township	Ocean	4	(99)	14	405	320	0	0	0
Long Beach township	Ocean	4	(198)	84	0	(114)	(64)	16	65
Manchester township	Ocean	4	(54)	136	637	719	0	0	0

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Mantoloking borough	Ocean	4	(18)	0	0	(18)	(15)	0	19
Ocean township	Ocean	4	(37)	1	(40)	(76)	(63)	6	74
Ocean Gate borough	Ocean	4	(7)	4	80	77	0	0	0
Pine Beach borough	Ocean	4	(1)	0	34	33	0	0	0
Plumsted township	Ocean	4	(11)	7	(65)	(69)	(45)	14	44
Point Pleasant borough	Ocean	4	(99)	26	(48)	(121)	(72)	11	80
Point Pleasant Beach bor.	Ocean	4	(68)	27	(71)	(112)	(79)	36	64
Seaside Heights borough	Ocean	4	(56)	68	0	12	(61)	79	0
Seaside Park borough	Ocean	4	(54)	25	(24)	(53)	(39)	30	19
Ship Bottom borough	Ocean	4	(63)	27	(59)	(95)	(44)	0	57
South Toms River borough	Ocean	4	(1)	1	187	187	0	0	0
Stafford township	Ocean	4	(136)	11	158	33	(90)	114	0
Surf City borough	Ocean	4	(55)	26	(4)	(33)	(20)	3	22
Toms River township	Ocean	4	(486)	48	235	(203)	(318)	296	111
Tuckerton borough	Ocean	4	(12)	3	119	110	0	0	0
Bass River township	Burlington	5	(4)	0	11	7	0	0	1
Beverly city	Burlington	5	(5)	0	17	12	0	0	0
Bordentown city	Burlington	5	(8)	1	33	26	(4)	19	0
Bordentown township	Burlington	5	(6)	1	117	112	0	0	0
Burlington city	Burlington	5	(20)	1	121	102	0	0	0
Burlington township	Burlington	5	(6)	1	88	83	(29)	27	108
Chesterfield township	Burlington	5	(20)	0	67	47	(1)	7	0
Cinnaminson township	Burlington	5	(13)	0	53	40	(9)	9	32
Delanco township	Burlington	5	(3)	0	66	63	0	0	0
Delran township	Burlington	5	(8)	1	211	204	0	0	0
Eastampton township	Burlington	5	(8)	0	(66)	(74)	(30)	0	140
Edgewater Park township	Burlington	5	(1)	1	106	106	(1)	2	0
Evesham township	Burlington	5	(13)	1	260	248	(44)	80	126
Fieldsboro borough	Burlington	5	(2)	0	101	99	0	0	0
Florence township	Burlington	5	(18)	1	102	85	(10)	45	0
Hainesport township	Burlington	5	(9)	0	2	(7)	(16)	0	74
Lumberton township	Burlington	5	(5)	0	248	243	0	0	0
Mansfield township	Burlington	5	(11)	0	134	123	0	0	0
Maple Shade township	Burlington	5	(25)	3	236	214	0	0	0
Medford township	Burlington	5	(6)	0	(16)	(22)	(31)	14	131
Medford Lakes borough	Burlington	5	(6)	0	92	86	0	0	0
Moorestown township	Burlington	5	(29)	1	97	69	(38)	27	151
Mount Holly township	Burlington	5	(93)	2	99	8	(9)	13	29
Mount Laurel township	Burlington	5	(26)	2	250	226	(36)	50	116
New Hanover township	Burlington	5	(1)	0	(197)	(198)	(47)	0	220
North Hanover township	Burlington	5	(15)	0	(266)	(281)	(52)	0	242
Palmyra borough	Burlington	5	(5)	1	126	122	0	0	0
Pemberton borough	Burlington	5	(4)	0	(38)	(42)	(9)	0	42

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Pemberton township	Burlington	5	(34)	1	175	142	0	0	0
Riverside township	Burlington	5	(5)	1	132	128	0	0	0
Riverton borough	Burlington	5	(1)	0	8	7	(4)	0	16
Shamong township	Burlington	5	(4)	0	(25)	(29)	(15)	25	46
Southampton township	Burlington	5	(25)	0	24	(1)	(9)	25	17
Springfield township	Burlington	5	(3)	0	38	35	(3)	3	13
Tabernacle township	Burlington	5	(6)	0	7	1	(7)	0	34
Washington township	Burlington	5	(6)	0	51	45	0	0	0
Westampton township	Burlington	5	(8)	0	205	197	0	0	0
Willingboro township	Burlington	5	(9)	0	406	397	0	0	0
Woodland township	Burlington	5	(4)	0	(1)	(5)	(8)	2	38
Wrightstown borough	Burlington	5	(2)	0	104	102	0	0	0
Audubon borough	Camden	5	(3)	2	(72)	(73)	(28)	61	70
Audubon Park borough	Camden	5	0	0	0	0	(2)	0	8
Barrington borough	Camden	5	(29)	1	(102)	(130)	(30)	20	119
Bellmawr borough	Camden	5	(8)	1	(100)	(107)	(29)	31	107
Berlin borough	Camden	5	(6)	1	(72)	(77)	(30)	43	97
Berlin township	Camden	5	(24)	1	(68)	(91)	(38)	46	130
Brooklawn borough	Camden	5	0	0	42	42	0	0	0
Camden city	Camden	5	(689)	16	810	137	(58)	269	0
Cherry Hill township	Camden	5	(46)	4	(156)	(198)	(193)	325	581
Chesilhurst borough	Camden	5	(11)	0	25	14	(2)	7	0
Clementon borough	Camden	5	(6)	1	3	(2)	(15)	61	10
Collingswood borough	Camden	5	(12)	5	(406)	(413)	(87)	51	355
Gibbsboro borough	Camden	5	(3)	0	6	3	(9)	25	18
Gloucester township	Camden	5	(8)	6	137	135	(51)	117	120
Gloucester City	Camden	5	(39)	2	177	140	0	0	0
Haddon township	Camden	5	(12)	2	(188)	(198)	(52)	46	197
Haddonfield borough	Camden	5	(18)	1	(14)	(31)	(21)	10	88
Haddon Heights borough	Camden	5	(5)	1	(75)	(79)	(23)	19	88
Hi-Nella borough	Camden	5	0	0	35	35	0	0	0
Laurel Springs borough	Camden	5	0	0	28	28	0	0	0
Lawnside borough	Camden	5	(10)	0	35	25	0	0	0
Lindenwold borough	Camden	5	(12)	3	231	222	0	0	0
Magnolia borough	Camden	5	(8)	0	(8)	(16)	(9)	18	25
Merchantville borough	Camden	5	0	2	(77)	(75)	(15)	0	70
Mount Ephraim borough	Camden	5	(9)	0	36	27	0	0	0
Oaklyn borough	Camden	5	0	1	(23)	(22)	(12)	13	43
Pennsauken township	Camden	5	(27)	5	(42)	(64)	(41)	167	23
Pine Hill borough	Camden	5	(13)	1	16	4	(7)	11	21
Pine Valley borough	Camden	5	(2)	0	0	(2)	(3)	0	13
Runnemede borough	Camden	5	(5)	1	(75)	(79)	(24)	33	79
Somerdale borough	Camden	5	(3)	1	(239)	(241)	(46)	0	217

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Stratford borough	Camden	5	(13)	1	(27)	(39)	(13)	15	46
Tavistock borough	Camden	5	0	0	0	0	(1)	0	4
Voorhees township	Camden	5	(17)	2	(215)	(230)	(116)	239	305
Waterford township	Camden	5	(11)	0	(113)	(124)	(28)	0	132
Winslow township	Camden	5	(83)	2	(33)	(114)	(64)	51	248
Woodlynne borough	Camden	5	0	1	90	91	0	0	0
Clayton borough	Gloucester	5	(15)	1	(92)	(106)	(34)	44	114
Deptford township	Gloucester	5	(49)	2	(72)	(119)	(70)	87	243
East Greenwich township	Gloucester	5	(3)	1	156	154	(1)	6	0
Elk township	Gloucester	5	(3)	0	26	23	(13)	4	57
Franklin township	Gloucester	5	(36)	1	(9)	(44)	(36)	51	116
Glassboro borough	Gloucester	5	(59)	1	(253)	(311)	(83)	13	376
Greenwich township	Gloucester	5	(5)	0	(4)	(9)	(10)	0	44
Harrison township	Gloucester	5	(24)	0	104	80	(14)	0	64
Logan township	Gloucester	5	(6)	0	3	(3)	(42)	0	198
Mantua township	Gloucester	5	(9)	0	(6)	(15)	(36)	56	112
Monroe township	Gloucester	5	(45)	1	(71)	(115)	(65)	90	215
National Park borough	Gloucester	5	(3)	0	0	(3)	(3)	6	10
Newfield borough	Gloucester	5	0	0	20	20	0	0	0
Paulsboro borough	Gloucester	5	(11)	2	60	51	(13)	62	0
Pitman borough	Gloucester	5	(3)	1	2	0	(11)	36	14
South Harrison township	Gloucester	5	(4)	0	(4)	(8)	(6)	0	30
Swedesboro borough	Gloucester	5	(3)	0	(2)	(5)	(9)	22	21
Washington township	Gloucester	5	(19)	2	69	52	(68)	173	146
Wenonah borough	Gloucester	5	(2)	0	25	23	0	0	1
West Deptford township	Gloucester	5	(12)	1	(152)	(163)	(56)	15	247
Westville borough	Gloucester	5	(2)	1	62	61	0	0	0
Woodbury city	Gloucester	5	(12)	2	24	14	(15)	16	57
Woodbury Heights borough	Gloucester	5	0	0	33	33	(1)	5	0
Woolwich township	Gloucester	5	(3)	0	662	659	0	0	0
Absecon city	Atlantic	6	(4)	5	118	119	0	0	0
Atlantic City	Atlantic	6	(231)	117	815	701	0	0	0
Brigantine city	Atlantic	6	(169)	47	(665)	(787)	(974)	0	0
Buena borough	Atlantic	6	(17)	10	104	97	0	0	0
Buena Vista township	Atlantic	6	(8)	7	108	107	0	0	0
Corbin City	Atlantic	6	(8)	0	25	17	0	0	0
Egg Harbor township	Atlantic	6	(120)	18	505	403	0	0	0
Egg Harbor City	Atlantic	6	(3)	10	120	127	0	0	0
Estell Manor city	Atlantic	6	(4)	0	9	5	0	0	0
Folsom borough	Atlantic	6	(3)	0	84	81	0	0	0
Galloway township	Atlantic	6	(65)	21	598	554	0	0	0
Hamilton township	Atlantic	6	(22)	17	101	96	(52)	0	0
Hammonton town	Atlantic	6	(21)	22	226	227	0	0	0

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Linwood city	Atlantic	6	(17)	2	131	116	0	0	0
Longport borough	Atlantic	6	(51)	3	(1)	(49)	(65)	0	0
Margate City	Atlantic	6	(144)	23	(215)	(336)	(458)	0	0
Mullica township	Atlantic	6	(15)	1	60	46	0	0	0
Northfield city	Atlantic	6	(10)	2	130	122	0	0	0
Pleasantville city	Atlantic	6	(38)	22	850	834	0	0	0
Port Republic city	Atlantic	6	(1)	0	(15)	(16)	(22)	0	0
Somers Point city	Atlantic	6	(12)	16	(96)	(92)	(138)	0	0
Ventnor City	Atlantic	6	(8)	44	(180)	(144)	(200)	0	0
Weymouth township	Atlantic	6	(4)	2	48	46	0	0	0
Avalon borough	Cape May	6	(313)	19	0	(294)	(352)	0	0
Cape May city	Cape May	6	(29)	26	(15)	(18)	(41)	0	0
Cape May Point borough	Cape May	6	(13)	1	0	(12)	(15)	0	0
Dennis township	Cape May	6	(15)	0	297	282	0	0	0
Lower township	Cape May	6	(85)	12	1,111	1,038	0	0	0
Middle township	Cape May	6	(66)	18	769	721	0	0	0
North Wildwood city	Cape May	6	(109)	73	336	300	0	0	0
Ocean City	Cape May	6	(915)	130	(26)	(811)	(1,027)	0	0
Sea Isle City	Cape May	6	(356)	38	2	(316)	(375)	0	0
Stone Harbor borough	Cape May	6	(116)	15	0	(101)	(121)	0	0
Upper township	Cape May	6	(17)	2	419	404	0	0	0
West Cape May borough	Cape May	6	(12)	3	(3)	(12)	(15)	0	0
West Wildwood borough	Cape May	6	(18)	5	98	85	0	0	0
Wildwood city	Cape May	6	(117)	82	461	426	0	0	0
Wildwood Crest borough	Cape May	6	(71)	37	167	133	0	0	0
Woodbine borough	Cape May	6	(4)	1	251	248	0	0	0
Bridgeton city	Cumberland	6	(59)	44	191	176	(146)	0	0
Commercial township	Cumberland	6	(22)	1	93	72	0	0	0
Deerfield township	Cumberland	6	(12)	1	29	18	0	0	0
Downe township	Cumberland	6	(17)	0	(46)	(63)	(86)	0	0
Fairfield township	Cumberland	6	(13)	2	15	4	(54)	0	0
Greenwich township	Cumberland	6	(3)	1	49	47	0	0	0
Hopewell township	Cumberland	6	(4)	2	26	24	0	0	0
Lawrence township	Cumberland	6	0	1	34	35	0	0	0
Maurice River township	Cumberland	6	(17)	2	17	2	(11)	0	0
Millville city	Cumberland	6	(88)	46	26	(16)	(187)	0	0
Shiloh borough	Cumberland	6	(1)	1	0	0	(6)	0	0
Stow Creek township	Cumberland	6	(2)	0	(7)	(9)	(13)	0	0
Upper Deerfield township	Cumberland	6	(36)	8	(127)	(155)	(240)	0	0
Vineland city	Cumberland	6	(123)	94	(541)	(570)	(980)	0	0
Alloway township	Salem	6	(1)	1	(1)	(1)	(6)	0	0
Carneys Point township	Salem	6	(15)	4	17	6	(66)	0	0
Elmer borough	Salem	6	(1)	2	(18)	(17)	(28)	0	0

Municipality	County	Reg.	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Elsinboro township	Salem	6	(5)	1	40	36	0	0	0
Lower Alloways Creek twp	Salem	6	(3)	1	50	48	0	0	0
Mannington township	Salem	6	(6)	0	22	16	0	0	0
Oldmans township	Salem	6	(5)	2	5	2	(27)	0	0
Penns Grove borough	Salem	6	(2)	12	181	191	0	0	0
Pennsville township	Salem	6	(21)	15	79	73	0	0	0
Pilesgrove township	Salem	6	(13)	0	(22)	(35)	(88)	0	0
Pittsgrove township	Salem	6	(17)	1	11	(5)	(41)	0	0
Quinton township	Salem	6	(5)	1	19	15	0	0	0
Salem city	Salem	6	(53)	15	204	166	0	0	0
Upper Pittsgrove township	Salem	6	(18)	0	(41)	(59)	(81)	0	0
Woodstown borough	Salem	6	(7)	6	44	43	0	0	0

APPENDIX D: ALLOCATION CAP ADJUSTMENTS TO MUNICIPAL OBLIGATIONS

TABLE D.1: ALLOCATION CAP ADJUSTMENTS TO MUNICIPAL OBLIGATIONS

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Allendale borough	Bergen	1	14	81	2,142	0	0	14	81
Alpine borough	Bergen	1	2	148	638	(21)	0	2	127
Bergenfield borough	Bergen	1	60	0	9,179	0	0	60	0
Bogota borough	Bergen	1	0	0	2,682	0	0	0	0
Carlstadt borough	Bergen	1	32	89	2,213	0	0	32	89
Cliffside Park borough	Bergen	1	11	0	10,487	0	0	11	0
Closter borough	Bergen	1	0	126	2,787	0	0	0	126
Cresskill borough	Bergen	1	40	290	3,161	0	0	40	290
Demarest borough	Bergen	1	0	106	1,653	0	0	0	106
Dumont borough	Bergen	1	3	0	6,303	0	0	3	0
East Rutherford borough	Bergen	1	175	12	3,892	0	0	175	12
Edgewater borough	Bergen	1	0	213	5,657	0	0	0	213
Elmwood Park borough	Bergen	1	40	7	7,182	0	0	40	7
Emerson borough	Bergen	1	53	64	2,472	0	0	53	64
Englewood city	Bergen	1	247	0	10,416	0	0	247	0
Englewood Cliffs borough	Bergen	1	0	294	1,749	0	0	0	294
Fair Lawn borough	Bergen	1	108	0	12,065	0	0	108	0
Fairview borough	Bergen	1	115	0	5,061	0	0	115	0
Fort Lee borough	Bergen	1	248	158	16,761	0	0	248	158
Franklin Lakes borough	Bergen	1	30	377	3,582	0	0	30	377
Garfield city	Bergen	1	0	0	11,028	0	0	0	0
Glen Rock borough	Bergen	1	13	48	3,728	0	0	13	48
Hackensack city	Bergen	1	0	0	18,492	0	0	0	0
Harrington Park borough	Bergen	1	4	104	1,657	0	0	4	104
Hasbrouck Heights borough	Bergen	1	64	262	4,444	0	0	64	262
Haworth borough	Bergen	1	0	43	1,147	0	0	0	43
Hillsdale borough	Bergen	1	13	80	3,489	0	0	13	80
Ho-Ho-Kus borough	Bergen	1	10	100	1,352	0	0	10	100
Leonia borough	Bergen	1	71	124	3,312	0	0	71	124
Little Ferry borough	Bergen	1	23	0	4,051	0	0	23	0
Lodi borough	Bergen	1	63	0	9,271	0	0	63	0
Lyndhurst township	Bergen	1	151	0	8,483	0	0	151	0
Mahwah township	Bergen	1	64	86	9,722	0	0	64	86
Maywood borough	Bergen	1	25	3	3,636	0	0	25	3
Midland Park borough	Bergen	1	23	34	2,791	0	0	23	34
Montvale borough	Bergen	1	2	303	2,886	0	0	2	303
Moonachie borough	Bergen	1	28	35	1,078	0	0	28	35
New Milford borough	Bergen	1	36	8	6,109	0	0	36	8

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
North Arlington borough	Bergen	1	67	0	6,129	0	0	67	0
Northvale borough	Bergen	1	3	53	1,506	0	0	3	53
Norwood borough	Bergen	1	0	71	1,856	0	0	0	71
Oakland borough	Bergen	1	24	29	4,204	0	0	24	29
Old Tappan borough	Bergen	1	9	257	1,968	0	0	9	257
Oradell borough	Bergen	1	14	18	2,636	0	0	14	18
Palisades Park borough	Bergen	1	125	80	7,526	0	0	125	80
Paramus borough	Bergen	1	133	529	8,581	0	0	133	529
Park Ridge borough	Bergen	1	108	66	3,135	0	0	108	66
Ramsey borough	Bergen	1	50	86	5,550	0	0	50	86
Ridgefield borough	Bergen	1	133	74	4,116	0	0	133	74
Ridgefield Park village	Bergen	1	29	0	4,563	0	0	29	0
Ridgewood village	Bergen	1	4	244	8,353	0	0	4	244
River Edge borough	Bergen	1	24	0	3,990	0	0	24	0
River Vale township	Bergen	1	19	78	3,306	0	0	19	78
Rochelle Park township	Bergen	1	0	17	2,068	0	0	0	17
Rockleigh borough	Bergen	1	0	190	71	(176)	0	0	14
Rutherford borough	Bergen	1	159	115	6,728	0	0	159	115
Saddle Brook township	Bergen	1	36	8	5,199	0	0	36	8
Saddle River borough	Bergen	1	43	277	1,070	(63)	0	43	214
South Hackensack township	Bergen	1	55	48	936	0	0	55	48
Teaneck township	Bergen	1	79	390	13,105	0	0	79	390
Tenafly borough	Bergen	1	21	202	4,811	0	0	21	202
Teterboro borough	Bergen	1	0	101	33	(95)	0	0	6
Upper Saddle River borough	Bergen	1	7	308	2,593	0	0	7	308
Waldwick borough	Bergen	1	41	0	3,442	0	0	41	0
Wallington borough	Bergen	1	0	0	4,667	0	0	0	0
Washington township	Bergen	1	0	156	3,320	0	0	0	156
Westwood borough	Bergen	1	50	23	4,324	0	0	50	23
Woodcliff Lake borough	Bergen	1	16	257	2,083	0	0	16	257
Wood-Ridge borough	Bergen	1	0	0	3,163	0	0	0	0
Wyckoff township	Bergen	1	31	225	5,817	0	0	31	225
Bayonne city	Hudson	1	845	682	25,630	0	(527)	845	155
East Newark borough	Hudson	1	8	20	817	0	0	8	20
Guttenberg town	Hudson	1	0	0	4,650	0	0	0	0
Harrison town	Hudson	1	248	397	5,483	0	0	248	397
Hoboken city	Hudson	1	0	0	24,786	0	0	0	0
Jersey City	Hudson	1	4,372	1,211	97,659	0	0	4,372	1,211
Kearny town	Hudson	1	227	481	13,578	0	0	227	481
North Bergen township	Hudson	1	793	134	21,575	0	0	793	134
Secaucus town	Hudson	1	54	399	7,153	0	0	54	399
Union City	Hudson	1	1,271	0	22,472	0	(271)	1,000	0
Weehawken township	Hudson	1	54	0	5,966	0	0	54	0
West New York town	Hudson	1	405	0	18,970	0	0	405	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Bloomingtondale borough	Passaic	1	56	0	2,875	0	0	56	0
Clifton city	Passaic	1	1,182	0	29,346	0	(182)	1,000	0
Haledon borough	Passaic	1	0	0	2,436	0	0	0	0
Hawthorne borough	Passaic	1	34	0	6,998	0	0	34	0
Little Falls township	Passaic	1	152	42	5,312	0	0	152	42
North Haledon borough	Passaic	1	0	115	2,966	0	0	0	115
Passaic city	Passaic	1	5,170	0	20,236	0	(4,170)	1,000	0
Paterson city	Passaic	1	2,110	0	43,950	0	(1,110)	1,000	0
Pompton Lakes borough	Passaic	1	0	0	3,979	0	0	0	0
Prospect Park borough	Passaic	1	0	0	1,690	0	0	0	0
Ringwood borough	Passaic	1	0	0	3,910	0	0	0	0
Totowa borough	Passaic	1	137	147	3,488	0	0	137	147
Wanaque borough	Passaic	1	4	0	4,144	0	0	4	0
Wayne township	Passaic	1	272	567	18,161	0	0	272	567
West Milford township	Passaic	1	0	0	9,393	0	0	0	0
Woodland Park borough	Passaic	1	246	116	4,497	0	0	246	116
Andover borough	Sussex	1	0	0	284	0	0	0	0
Andover township	Sussex	1	7	183	1,959	0	0	7	183
Branchville borough	Sussex	1	1	189	375	(114)	0	1	75
Byram township	Sussex	1	28	43	2,915	0	0	28	43
Frankford township	Sussex	1	31	49	2,054	0	0	31	49
Franklin borough	Sussex	1	1	0	2,030	0	0	1	0
Fredon township	Sussex	1	23	99	1,222	0	0	23	99
Green township	Sussex	1	0	0	1,192	0	0	0	0
Hamburg borough	Sussex	1	0	0	1,483	0	0	0	0
Hampton township	Sussex	1	8	35	2,022	0	0	8	35
Hardyston township	Sussex	1	20	399	3,435	0	0	20	399
Hopatcong borough	Sussex	1	0	0	5,689	0	0	0	0
Lafayette township	Sussex	1	0	89	896	0	0	0	89
Montague township	Sussex	1	0	0	1,543	0	0	0	0
Newton town	Sussex	1	172	131	3,286	0	0	172	131
Ogdensburg borough	Sussex	1	0	0	845	0	0	0	0
Sandyston township	Sussex	1	0	0	806	0	0	0	0
Sparta township	Sussex	1	0	0	6,710	0	0	0	0
Stanhope borough	Sussex	1	0	0	1,411	0	0	0	0
Stillwater township	Sussex	1	0	23	1,663	0	0	0	23
Sussex borough	Sussex	1	0	0	829	0	0	0	0
Vernon township	Sussex	1	43	8	8,367	0	0	43	8
Walpack township	Sussex	1	0	1	4	(1)	0	0	0
Wantage township	Sussex	1	0	0	4,021	0	0	0	0
Belleville township	Essex	2	101	0	12,892	0	0	101	0
Bloomfield township	Essex	2	0	0	17,835	0	0	0	0
Caldwell borough	Essex	2	14	7	3,452	0	0	14	7
Cedar Grove township	Essex	2	15	24	4,282	0	0	15	24

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
City of Orange township	Essex	2	38	0	11,234	0	0	38	0
East Orange city	Essex	2	0	0	25,115	0	0	0	0
Essex Fells borough	Essex	2	0	38	705	0	0	0	38
Fairfield township	Essex	2	45	71	2,532	0	0	45	71
Glen Ridge borough	Essex	2	0	0	2,447	0	0	0	0
Irvington township	Essex	2	0	0	20,193	0	0	0	0
Livingston township	Essex	2	14	80	9,670	0	0	14	80
Maplewood township	Essex	2	0	0	8,227	0	0	0	0
Millburn township	Essex	2	137	274	6,677	0	0	137	274
Montclair township	Essex	2	0	0	14,383	0	0	0	0
Newark city	Essex	2	0	0	93,175	0	0	0	0
North Caldwell borough	Essex	2	34	19	2,167	0	0	34	19
Nutley township	Essex	2	141	0	11,264	0	0	141	0
Roseland borough	Essex	2	0	49	2,435	0	0	0	49
S. Orange Village township	Essex	2	0	207	5,312	0	0	0	207
Verona township	Essex	2	0	0	5,222	0	0	0	0
West Caldwell township	Essex	2	46	51	3,821	0	0	46	51
West Orange township	Essex	2	84	0	16,018	0	0	84	0
Boonton town	Morris	2	16	0	3,185	0	0	16	0
Boonton township	Morris	2	23	10	1,518	0	0	23	10
Butler borough	Morris	2	0	0	2,856	0	0	0	0
Chatham borough	Morris	2	0	62	2,899	0	0	0	62
Chatham township	Morris	2	56	208	4,004	0	0	56	208
Chester borough	Morris	2	11	50	561	0	0	11	50
Chester township	Morris	2	28	8	2,476	0	0	28	8
Denville township	Morris	2	0	0	6,486	0	0	0	0
Dover town	Morris	2	99	0	5,423	0	0	99	0
East Hanover township	Morris	2	35	101	3,888	0	0	35	101
Florham Park borough	Morris	2	68	506	4,135	0	0	68	506
Hanover township	Morris	2	28	99	5,227	0	0	28	99
Harding township	Morris	2	0	107	1,443	0	0	0	107
Jefferson township	Morris	2	0	0	7,765	0	0	0	0
Kinnelon borough	Morris	2	0	28	3,635	0	0	0	28
Lincoln Park borough	Morris	2	10	26	3,966	0	0	10	26
Long Hill township	Morris	2	14	16	2,940	0	0	14	16
Madison borough	Morris	2	5	71	5,469	0	0	5	71
Mendham borough	Morris	2	10	33	1,656	0	0	10	33
Mendham township	Morris	2	23	68	1,977	0	0	23	68
Mine Hill township	Morris	2	0	0	1,221	0	0	0	0
Montville township	Morris	2	17	49	7,529	0	0	17	49
Morris township	Morris	2	28	294	8,291	0	0	28	294
Morris Plains borough	Morris	2	32	9	2,142	0	0	32	9
Morristown town	Morris	2	140	41	7,977	0	0	140	41
Mountain Lakes borough	Morris	2	1	47	1,265	0	0	1	47

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Mount Arlington borough	Morris	2	1	0	2,440	0	0	1	0
Mount Olive township	Morris	2	0	0	11,083	0	0	0	0
Netcong borough	Morris	2	0	0	1,489	0	0	0	0
Parsippany-Troy Hills twp	Morris	2	0	0	19,779	0	0	0	0
Pequannock township	Morris	2	76	5	6,251	0	0	76	5
Randolph township	Morris	2	0	0	9,090	0	0	0	0
Riverdale borough	Morris	2	0	0	1,901	0	0	0	0
Rockaway borough	Morris	2	17	38	2,568	0	0	17	38
Rockaway township	Morris	2	0	0	8,862	0	0	0	0
Roxbury township	Morris	2	0	0	8,068	0	0	0	0
Victory Gardens borough	Morris	2	0	0	555	0	0	0	0
Washington township	Morris	2	10	7	6,472	0	0	10	7
Wharton borough	Morris	2	85	0	2,187	0	0	85	0
Berkeley Heights township	Union	2	9	193	4,388	0	0	9	193
Clark township	Union	2	37	122	5,503	0	0	37	122
Cranford township	Union	2	98	64	8,696	0	0	98	64
Elizabeth city	Union	2	4,247	0	39,526	0	(3,247)	1,000	0
Fanwood borough	Union	2	17	20	2,545	0	0	17	20
Garwood borough	Union	2	40	56	1,622	0	0	40	56
Hillside township	Union	2	203	0	7,250	0	0	203	0
Kenilworth borough	Union	2	0	58	2,637	0	0	0	58
Linden city	Union	2	470	117	14,793	0	0	470	117
Mountainside borough	Union	2	138	4	2,424	0	0	138	4
New Providence borough	Union	2	63	31	4,417	0	0	63	31
Plainfield city	Union	2	403	0	14,529	0	0	403	0
Rahway city	Union	2	115	98	10,691	0	0	115	98
Roselle borough	Union	2	108	0	8,299	0	0	108	0
Roselle Park borough	Union	2	81	88	5,159	0	0	81	88
Scotch Plains township	Union	2	101	85	8,502	0	0	101	85
Springfield township	Union	2	0	78	7,298	0	0	0	78
Summit city	Union	2	172	127	7,733	0	0	172	127
Union township	Union	2	410	203	20,264	0	0	410	203
Westfield town	Union	2	76	140	10,026	0	0	76	140
Winfield township	Union	2	22	7	687	0	0	22	7
Allamuchy township	Warren	2	55	19	2,111	0	0	55	19
Alpha borough	Warren	2	7	0	995	0	0	7	0
Belvidere town	Warren	2	1	0	1,080	0	0	1	0
Blairstown township	Warren	2	0	3	2,150	0	0	0	3
Franklin township	Warren	2	0	4	1,104	0	0	0	4
Frelinghuysen township	Warren	2	0	51	803	0	0	0	51
Greenwich township	Warren	2	0	24	1,824	0	0	0	24
Hackettstown town	Warren	2	135	90	3,509	0	0	135	90
Hardwick township	Warren	2	0	0	590	0	0	0	0
Harmony township	Warren	2	0	0	960	0	0	0	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Hope township	Warren	2	0	0	667	0	0	0	0
Independence township	Warren	2	0	0	2,300	0	0	0	0
Knowlton township	Warren	2	0	0	1,125	0	0	0	0
Liberty township	Warren	2	0	0	1,041	0	0	0	0
Lopatcong township	Warren	2	0	0	3,165	0	0	0	0
Mansfield township	Warren	2	20	100	3,092	0	0	20	100
Oxford township	Warren	2	0	0	1,006	0	0	0	0
Phillipsburg town	Warren	2	0	0	5,824	0	0	0	0
Pohatcong township	Warren	2	8	0	1,217	0	0	8	0
Washington borough	Warren	2	0	0	2,572	0	0	0	0
Washington township	Warren	2	0	0	2,472	0	0	0	0
White township	Warren	2	60	51	2,159	0	0	60	51
Alexandria township	Hunterdon	3	25	0	1,670	0	0	25	0
Bethlehem township	Hunterdon	3	0	0	1,253	0	0	0	0
Bloomsbury borough	Hunterdon	3	0	0	294	0	0	0	0
Califon borough	Hunterdon	3	0	0	400	0	0	0	0
Clinton town	Hunterdon	3	0	0	1,015	0	0	0	0
Clinton township	Hunterdon	3	0	0	4,309	0	0	0	0
Delaware township	Hunterdon	3	20	0	1,882	0	0	20	0
East Amwell township	Hunterdon	3	0	0	1,436	0	0	0	0
Flemington borough	Hunterdon	3	77	43	1,841	0	0	77	43
Franklin township	Hunterdon	3	0	59	1,187	0	0	0	59
Frenchtown borough	Hunterdon	3	0	0	665	0	0	0	0
Glen Gardner borough	Hunterdon	3	0	0	723	0	0	0	0
Hampton borough	Hunterdon	3	0	0	486	0	0	0	0
High Bridge borough	Hunterdon	3	0	0	1,418	0	0	0	0
Holland township	Hunterdon	3	45	0	2,091	0	0	45	0
Kingwood township	Hunterdon	3	0	0	1,374	0	0	0	0
Lambertville city	Hunterdon	3	58	0	1,869	0	0	58	0
Lebanon borough	Hunterdon	3	0	0	708	0	0	0	0
Lebanon township	Hunterdon	3	0	0	2,252	0	0	0	0
Milford borough	Hunterdon	3	0	0	446	0	0	0	0
Raritan township	Hunterdon	3	34	13	8,407	0	0	34	13
Readington township	Hunterdon	3	130	153	6,071	0	0	130	153
Stockton borough	Hunterdon	3	0	0	205	0	0	0	0
Tewksbury township	Hunterdon	3	0	42	2,190	0	0	0	42
Union township	Hunterdon	3	1	207	1,849	0	0	1	207
West Amwell township	Hunterdon	3	0	19	1,074	0	0	0	19
Carteret borough	Middlesex	3	117	196	7,869	0	0	117	196
Cranbury township	Middlesex	3	3	81	1,251	0	0	3	81
Dunellen borough	Middlesex	3	1	61	2,617	0	0	1	61
East Brunswick township	Middlesex	3	90	417	16,860	0	0	90	417
Edison township	Middlesex	3	647	659	34,232	0	(306)	647	353
Helmetta borough	Middlesex	3	0	0	924	0	0	0	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Highland Park borough	Middlesex	3	79	433	5,706	0	0	79	433
Jamesburg borough	Middlesex	3	37	104	2,264	0	0	37	104
Metuchen borough	Middlesex	3	81	118	5,209	0	0	81	118
Middlesex borough	Middlesex	3	77	178	4,843	0	0	77	178
Milltown borough	Middlesex	3	39	31	2,576	0	0	39	31
Monroe township	Middlesex	3	106	1,546	18,184	0	(652)	106	894
New Brunswick city	Middlesex	3	1,539	26	14,203	0	(565)	1,000	0
North Brunswick township	Middlesex	3	223	218	14,678	0	0	223	218
Old Bridge township	Middlesex	3	210	500	23,938	0	0	210	500
Perth Amboy city	Middlesex	3	455	0	16,344	0	0	455	0
Piscataway township	Middlesex	3	317	277	17,381	0	0	317	277
Plainsboro township	Middlesex	3	6	539	9,263	0	0	6	539
Sayreville borough	Middlesex	3	150	267	15,956	0	0	150	267
South Amboy city	Middlesex	3	41	16	3,589	0	0	41	16
South Brunswick township	Middlesex	3	130	237	15,284	0	0	130	237
South Plainfield borough	Middlesex	3	56	305	8,152	0	0	56	305
South River borough	Middlesex	3	175	173	5,358	0	0	175	173
Spotswood borough	Middlesex	3	12	100	3,160	0	0	12	100
Woodbridge township	Middlesex	3	417	775	34,464	0	(192)	417	583
Bedminster township	Somerset	3	1	97	4,001	0	0	1	97
Bernards township	Somerset	3	34	411	9,690	0	0	34	411
Bernardsville borough	Somerset	3	0	69	2,574	0	0	0	69
Bound Brook borough	Somerset	3	0	0	3,480	0	0	0	0
Branchburg township	Somerset	3	2	25	5,176	0	0	2	25
Bridgewater township	Somerset	3	126	76	15,497	0	0	126	76
Far Hills borough	Somerset	3	2	19	381	0	0	2	19
Franklin township	Somerset	3	0	0	24,639	0	0	0	0
Green Brook township	Somerset	3	4	0	2,338	0	0	4	0
Hillsborough township	Somerset	3	57	0	13,515	0	0	57	0
Manville borough	Somerset	3	169	0	3,831	0	0	169	0
Millstone borough	Somerset	3	0	47	159	(16)	0	0	31
Montgomery township	Somerset	3	76	157	7,475	0	0	76	157
North Plainfield borough	Somerset	3	50	0	7,353	0	0	50	0
Peapack & Gladstone bor.	Somerset	3	0	0	939	0	0	0	0
Raritan borough	Somerset	3	41	83	3,117	0	0	41	83
Rocky Hill borough	Somerset	3	0	17	244	0	0	0	17
Somerville borough	Somerset	3	109	14	4,736	0	0	109	14
South Bound Brook borough	Somerset	3	0	0	1,585	0	0	0	0
Warren township	Somerset	3	59	173	5,007	0	0	59	173
Watchung borough	Somerset	3	19	101	2,107	0	0	19	101
East Windsor township	Mercer	4	65	20	9,936	0	0	65	20
Ewing township	Mercer	4	128	101	12,875	0	0	128	101
Hamilton township	Mercer	4	539	358	33,799	0	0	539	358
Hightstown borough	Mercer	4	16	0	1,922	0	0	16	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Hopewell borough	Mercer	4	18	16	754	0	0	18	16
Hopewell township	Mercer	4	0	102	6,586	0	0	0	102
Lawrence township	Mercer	4	60	58	12,053	0	0	60	58
Pennington borough	Mercer	4	55	0	1,031	0	0	55	0
Princeton	Mercer	4	91	98	9,571	0	0	91	98
Robbinsville township	Mercer	4	20	64	5,281	0	0	20	64
Trenton city	Mercer	4	73	0	28,107	0	0	73	0
West Windsor township	Mercer	4	105	0	9,893	0	0	105	0
Aberdeen township	Monmouth	4	0	0	7,073	0	0	0	0
Allenhurst borough	Monmouth	4	4	6	206	0	0	4	6
Allentown borough	Monmouth	4	0	0	682	0	0	0	0
Asbury Park city	Monmouth	4	260	28	6,615	0	0	260	28
Atlantic Highlands borough	Monmouth	4	62	0	1,734	0	0	62	0
Avon-by-the-Sea borough	Monmouth	4	0	20	869	0	0	0	20
Belmar borough	Monmouth	4	54	100	2,747	0	0	54	100
Bradley Beach borough	Monmouth	4	13	51	2,197	0	0	13	51
Brielle borough	Monmouth	4	11	6	1,872	0	0	11	6
Colts Neck township	Monmouth	4	14	16	3,204	0	0	14	16
Deal borough	Monmouth	4	2	14	337	0	0	2	14
Eatontown borough	Monmouth	4	116	34	5,263	0	0	116	34
Englishtown borough	Monmouth	4	0	0	721	0	0	0	0
Fair Haven borough	Monmouth	4	0	27	2,128	0	0	0	27
Farmingdale borough	Monmouth	4	2	9	555	0	0	2	9
Freehold borough	Monmouth	4	78	0	3,895	0	0	78	0
Freehold township	Monmouth	4	0	0	12,624	0	0	0	0
Hazlet township	Monmouth	4	0	0	7,029	0	0	0	0
Highlands borough	Monmouth	4	0	0	2,327	0	0	0	0
Holmdel township	Monmouth	4	19	0	5,588	0	0	19	0
Howell township	Monmouth	4	0	0	18,101	0	0	0	0
Interlaken borough	Monmouth	4	3	7	374	0	0	3	7
Keansburg borough	Monmouth	4	0	0	3,988	0	0	0	0
Keyport borough	Monmouth	4	0	0	3,167	0	0	0	0
Lake Como borough	Monmouth	4	3	51	762	0	0	3	51
Little Silver borough	Monmouth	4	7	10	2,079	0	0	7	10
Loch Arbour village	Monmouth	4	0	8	80	0	0	0	8
Long Branch city	Monmouth	4	311	299	12,218	0	0	311	299
Manalapan township	Monmouth	4	0	0	13,730	0	0	0	0
Manasquan borough	Monmouth	4	0	59	2,442	0	0	0	59
Marlboro township	Monmouth	4	0	0	12,859	0	0	0	0
Matawan borough	Monmouth	4	0	0	3,433	0	0	0	0
Middletown township	Monmouth	4	0	0	24,028	0	0	0	0
Millstone township	Monmouth	4	0	0	3,399	0	0	0	0
Monmouth Beach borough	Monmouth	4	0	32	1,564	0	0	0	32
Neptune township	Monmouth	4	73	0	11,191	0	0	73	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Neptune City borough	Monmouth	4	13	27	2,002	0	0	13	27
Ocean township	Monmouth	4	81	19	10,750	0	0	81	19
Oceanport borough	Monmouth	4	0	22	2,141	0	0	0	22
Red Bank borough	Monmouth	4	126	0	5,083	0	0	126	0
Roosevelt borough	Monmouth	4	0	0	277	0	0	0	0
Rumson borough	Monmouth	4	26	67	2,285	0	0	26	67
Sea Bright borough	Monmouth	4	11	23	686	0	0	11	23
Sea Girt borough	Monmouth	4	0	45	785	0	0	0	45
Shrewsbury borough	Monmouth	4	10	20	1,466	0	0	10	20
Shrewsbury township	Monmouth	4	0	0	469	0	0	0	0
Spring Lake borough	Monmouth	4	12	41	1,206	0	0	12	41
Spring Lake Heights bor.	Monmouth	4	20	65	2,204	0	0	20	65
Tinton Falls borough	Monmouth	4	7	0	8,129	0	0	7	0
Union Beach borough	Monmouth	4	0	0	1,808	0	0	0	0
Upper Freehold township	Monmouth	4	23	0	2,387	0	0	23	0
Wall township	Monmouth	4	105	78	10,045	0	0	105	78
West Long Branch borough	Monmouth	4	14	18	2,535	0	0	14	18
Barnegat township	Ocean	4	63	7	8,629	0	0	63	7
Barnegat Light borough	Ocean	4	12	0	282	0	0	12	0
Bay Head borough	Ocean	4	1	12	468	0	0	1	12
Beach Haven borough	Ocean	4	3	27	518	0	0	3	27
Beachwood borough	Ocean	4	0	0	3,584	0	0	0	0
Berkeley township	Ocean	4	0	0	20,644	0	0	0	0
Brick township	Ocean	4	262	0	29,717	0	0	262	0
Eagleswood township	Ocean	4	0	5	583	0	0	0	5
Harvey Cedars borough	Ocean	4	3	4	251	0	0	3	4
Island Heights borough	Ocean	4	3	23	691	0	0	3	23
Jackson township	Ocean	4	56	74	19,992	0	0	56	74
Lacey township	Ocean	4	48	0	10,699	0	0	48	0
Lakehurst borough	Ocean	4	0	0	901	0	0	0	0
Lakewood township	Ocean	4	533	412	25,610	0	0	533	412
Lavallette borough	Ocean	4	0	33	885	0	0	0	33
Little Egg Harbor township	Ocean	4	0	0	8,073	0	0	0	0
Long Beach township	Ocean	4	16	65	1,354	0	0	16	65
Manchester township	Ocean	4	0	0	22,663	0	0	0	0
Mantoloking borough	Ocean	4	0	19	105	0	0	0	19
Ocean township	Ocean	4	6	74	3,676	0	0	6	74
Ocean Gate borough	Ocean	4	0	0	779	0	0	0	0
Pine Beach borough	Ocean	4	0	0	797	0	0	0	0
Plumsted township	Ocean	4	14	44	2,936	0	0	14	44
Point Pleasant borough	Ocean	4	11	80	7,211	0	0	11	80
Point Pleasant Beach bor.	Ocean	4	36	64	1,758	0	0	36	64
Seaside Heights borough	Ocean	4	79	0	1,428	0	0	79	0
Seaside Park borough	Ocean	4	30	19	647	0	0	30	19

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Ship Bottom borough	Ocean	4	0	57	480	0	0	0	57
South Toms River borough	Ocean	4	0	0	1,035	0	0	0	0
Stafford township	Ocean	4	114	0	10,104	0	0	114	0
Surf City borough	Ocean	4	3	22	614	0	0	3	22
Toms River township	Ocean	4	296	111	34,118	0	0	296	111
Tuckerton borough	Ocean	4	0	0	1,297	0	0	0	0
Bass River township	Burlington	5	0	1	562	0	0	0	1
Beverly city	Burlington	5	0	0	958	0	0	0	0
Bordentown city	Burlington	5	19	0	1,819	0	0	19	0
Bordentown township	Burlington	5	0	0	4,399	0	0	0	0
Burlington city	Burlington	5	0	0	4,141	0	0	0	0
Burlington township	Burlington	5	27	108	7,624	0	0	27	108
Chesterfield township	Burlington	5	7	0	1,795	0	0	7	0
Cinnaminson township	Burlington	5	9	32	6,149	0	0	9	32
Delanco township	Burlington	5	0	0	1,750	0	0	0	0
Delran township	Burlington	5	0	0	5,988	0	0	0	0
Eastampton township	Burlington	5	0	140	2,450	0	0	0	140
Edgewater Park township	Burlington	5	2	0	3,603	0	0	2	0
Evesham township	Burlington	5	80	126	17,367	0	0	80	126
Fieldsboro borough	Burlington	5	0	0	185	0	0	0	0
Florence township	Burlington	5	45	0	4,946	0	0	45	0
Hainesport township	Burlington	5	0	74	2,243	0	0	0	74
Lumberton township	Burlington	5	0	0	4,443	0	0	0	0
Mansfield township	Burlington	5	0	0	3,186	0	0	0	0
Maple Shade township	Burlington	5	0	0	8,094	0	0	0	0
Medford township	Burlington	5	14	131	8,302	0	0	14	131
Medford Lakes borough	Burlington	5	0	0	1,570	0	0	0	0
Moorestown township	Burlington	5	27	151	7,385	0	0	27	151
Mount Holly township	Burlington	5	13	29	3,483	0	0	13	29
Mount Laurel township	Burlington	5	50	116	17,628	0	0	50	116
New Hanover township	Burlington	5	0	220	764	(68)	0	0	152
North Hanover township	Burlington	5	0	242	2,531	0	0	0	242
Palmyra borough	Burlington	5	0	0	3,159	0	0	0	0
Pemberton borough	Burlington	5	0	42	634	0	0	0	42
Pemberton township	Burlington	5	0	0	10,008	0	0	0	0
Riverside township	Burlington	5	0	0	2,811	0	0	0	0
Riverton borough	Burlington	5	0	16	1,072	0	0	0	16
Shamong township	Burlington	5	25	46	2,210	0	0	25	46
Southampton township	Burlington	5	25	17	4,692	0	0	25	17
Springfield township	Burlington	5	3	13	1,225	0	0	3	13
Tabernacle township	Burlington	5	0	34	2,446	0	0	0	34
Washington township	Burlington	5	0	0	300	0	0	0	0
Westampton township	Burlington	5	0	0	3,010	0	0	0	0
Willingboro township	Burlington	5	0	0	10,818	0	0	0	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Woodland township	Burlington	5	2	38	534	0	0	2	38
Wrightstown borough	Burlington	5	0	0	332	0	0	0	0
Audubon borough	Camden	5	61	70	3,567	0	0	61	70
Audubon Park borough	Camden	5	0	8	494	0	0	0	8
Barrington borough	Camden	5	20	119	2,895	0	0	20	119
Bellmawr borough	Camden	5	31	107	4,336	0	0	31	107
Berlin borough	Camden	5	43	97	2,693	0	0	43	97
Berlin township	Camden	5	46	130	1,897	0	0	46	130
Brooklawn borough	Camden	5	0	0	709	0	0	0	0
Camden city	Camden	5	269	0	24,771	0	0	269	0
Cherry Hill township	Camden	5	325	581	26,823	0	0	325	581
Chesilhurst borough	Camden	5	7	0	578	0	0	7	0
Clementon borough	Camden	5	61	10	2,203	0	0	61	10
Collingswood borough	Camden	5	51	355	6,289	0	0	51	355
Gibbsboro borough	Camden	5	25	18	770	0	0	25	18
Gloucester township	Camden	5	117	120	23,125	0	0	117	120
Gloucester City	Camden	5	0	0	4,146	0	0	0	0
Haddon township	Camden	5	46	197	6,184	0	0	46	197
Haddonfield borough	Camden	5	10	88	4,201	0	0	10	88
Haddon Heights borough	Camden	5	19	88	2,878	0	0	19	88
Hi-Nella borough	Camden	5	0	0	388	0	0	0	0
Laurel Springs borough	Camden	5	0	0	664	0	0	0	0
Lawnside borough	Camden	5	0	0	1,029	0	0	0	0
Lindenwold borough	Camden	5	0	0	7,412	0	0	0	0
Magnolia borough	Camden	5	18	25	1,715	0	0	18	25
Merchantville borough	Camden	5	0	70	1,596	0	0	0	70
Mount Ephraim borough	Camden	5	0	0	1,932	0	0	0	0
Oaklyn borough	Camden	5	13	43	1,700	0	0	13	43
Pennsauken township	Camden	5	167	23	12,176	0	0	167	23
Pine Hill borough	Camden	5	11	21	4,062	0	0	11	21
Pine Valley borough	Camden	5	0	13	2	(13)	0	0	0
Runnemede borough	Camden	5	33	79	3,026	0	0	33	79
Somerdale borough	Camden	5	0	217	2,205	0	0	0	217
Stratford borough	Camden	5	15	46	2,652	0	0	15	46
Tavistock borough	Camden	5	0	4	3	(4)	0	0	0
Voorhees township	Camden	5	239	305	11,344	0	0	239	305
Waterford township	Camden	5	0	132	3,575	0	0	0	132
Winslow township	Camden	5	51	248	13,971	0	0	51	248
Woodlynne borough	Camden	5	0	0	939	0	0	0	0
Clayton borough	Gloucester	5	44	114	3,166	0	0	44	114
Deptford township	Gloucester	5	87	243	11,850	0	0	87	243
East Greenwich township	Gloucester	5	6	0	3,476	0	0	6	0
Elk township	Gloucester	5	4	57	1,527	0	0	4	57
Franklin township	Gloucester	5	51	116	5,640	0	0	51	116

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Glassboro borough	Gloucester	5	13	376	6,072	0	0	13	376
Greenwich township	Gloucester	5	0	44	2,056	0	0	0	44
Harrison township	Gloucester	5	0	64	4,015	0	0	0	64
Logan township	Gloucester	5	0	198	2,183	0	0	0	198
Mantua township	Gloucester	5	56	112	5,856	0	0	56	112
Monroe township	Gloucester	5	90	215	13,087	0	0	90	215
National Park borough	Gloucester	5	6	10	1,048	0	0	6	10
Newfield borough	Gloucester	5	0	0	607	0	0	0	0
Paulsboro borough	Gloucester	5	62	0	2,181	0	0	62	0
Pitman borough	Gloucester	5	36	14	3,533	0	0	36	14
South Harrison township	Gloucester	5	0	30	968	0	0	0	30
Swedesboro borough	Gloucester	5	22	21	955	0	0	22	21
Washington township	Gloucester	5	173	146	17,246	0	0	173	146
Wenonah borough	Gloucester	5	0	1	790	0	0	0	1
West Deptford township	Gloucester	5	15	247	9,123	0	0	15	247
Westville borough	Gloucester	5	0	0	1,728	0	0	0	0
Woodbury city	Gloucester	5	16	57	3,962	0	0	16	57
Woodbury Heights borough	Gloucester	5	5	0	1,117	0	0	5	0
Woolwich township	Gloucester	5	0	0	3,839	0	0	0	0
Absecon city	Atlantic	6	0	0	3,123	0	0	0	0
Atlantic City	Atlantic	6	0	0	16,023	0	0	0	0
Brigantine city	Atlantic	6	0	0	4,226	0	0	0	0
Buena borough	Atlantic	6	0	0	1,644	0	0	0	0
Buena Vista township	Atlantic	6	0	0	2,933	0	0	0	0
Corbin City	Atlantic	6	0	0	232	0	0	0	0
Egg Harbor township	Atlantic	6	0	0	15,195	0	0	0	0
Egg Harbor City	Atlantic	6	0	0	1,464	0	0	0	0
Estell Manor city	Atlantic	6	0	0	616	0	0	0	0
Folsom borough	Atlantic	6	0	0	616	0	0	0	0
Galloway township	Atlantic	6	0	0	12,091	0	0	0	0
Hamilton township	Atlantic	6	0	0	9,403	0	0	0	0
Hammonton town	Atlantic	6	0	0	5,443	0	0	0	0
Linwood city	Atlantic	6	0	0	2,527	0	0	0	0
Longport borough	Atlantic	6	0	0	525	0	0	0	0
Margate City	Atlantic	6	0	0	3,109	0	0	0	0
Mullica township	Atlantic	6	0	0	2,058	0	0	0	0
Northfield city	Atlantic	6	0	0	3,168	0	0	0	0
Pleasantville city	Atlantic	6	0	0	7,023	0	0	0	0
Port Republic city	Atlantic	6	0	0	366	0	0	0	0
Somers Point city	Atlantic	6	0	0	4,470	0	0	0	0
Ventnor City	Atlantic	6	0	0	4,493	0	0	0	0
Weymouth township	Atlantic	6	0	0	1,180	0	0	0	0
Avalon borough	Cape May	6	0	0	962	0	0	0	0
Cape May city	Cape May	6	0	0	1,609	0	0	0	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Cape May Point borough	Cape May	6	0	0	103	0	0	0	0
Dennis township	Cape May	6	0	0	2,478	0	0	0	0
Lower township	Cape May	6	0	0	9,976	0	0	0	0
Middle township	Cape May	6	0	0	7,792	0	0	0	0
North Wildwood city	Cape May	6	0	0	1,975	0	0	0	0
Ocean City	Cape May	6	0	0	5,714	0	0	0	0
Sea Isle City	Cape May	6	0	0	1,131	0	0	0	0
Stone Harbor borough	Cape May	6	0	0	421	0	0	0	0
Upper township	Cape May	6	0	0	4,856	0	0	0	0
West Cape May borough	Cape May	6	0	0	479	0	0	0	0
West Wildwood borough	Cape May	6	0	0	307	0	0	0	0
Wildwood city	Cape May	6	0	0	2,504	0	0	0	0
Wildwood Crest borough	Cape May	6	0	0	1,599	0	0	0	0
Woodbine borough	Cape May	6	0	0	816	0	0	0	0
Bridgeton city	Cumberland	6	0	0	5,905	0	0	0	0
Commercial township	Cumberland	6	0	0	1,885	0	0	0	0
Deerfield township	Cumberland	6	0	0	1,002	0	0	0	0
Downe township	Cumberland	6	0	0	542	0	0	0	0
Fairfield township	Cumberland	6	0	0	1,759	0	0	0	0
Greenwich township	Cumberland	6	0	0	400	0	0	0	0
Hopewell township	Cumberland	6	0	0	1,624	0	0	0	0
Lawrence township	Cumberland	6	0	0	1,179	0	0	0	0
Maurice River township	Cumberland	6	0	0	1,497	0	0	0	0
Milville city	Cumberland	6	0	0	10,329	0	0	0	0
Shiloh borough	Cumberland	6	0	0	218	0	0	0	0
Stow Creek township	Cumberland	6	0	0	504	0	0	0	0
Upper Deerfield township	Cumberland	6	0	0	2,890	0	0	0	0
Vineland city	Cumberland	6	0	0	21,147	0	0	0	0
Alloway township	Salem	6	0	0	1,153	0	0	0	0
Carneys Point township	Salem	6	0	0	3,195	0	0	0	0
Elmer borough	Salem	6	0	0	511	0	0	0	0
Elsinboro township	Salem	6	0	0	453	0	0	0	0
Lower Alloways Creek twp	Salem	6	0	0	628	0	0	0	0
Mannington township	Salem	6	0	0	503	0	0	0	0
Oldmans township	Salem	6	0	0	759	0	0	0	0
Penns Grove borough	Salem	6	0	0	1,907	0	0	0	0
Pennsville township	Salem	6	0	0	5,619	0	0	0	0
Pilesgrove township	Salem	6	0	0	1,496	0	0	0	0
Pittsgrove township	Salem	6	0	0	3,310	0	0	0	0
Quinton township	Salem	6	0	0	1,035	0	0	0	0
Salem city	Salem	6	0	0	1,942	0	0	0	0
Upper Pittsgrove township	Salem	6	0	0	1,159	0	0	0	0
Woodstown borough	Salem	6	0	0	1,408	0	0	0	0

APPENDIX E: INITIAL SUMMARY OBLIGATIONS BY MUNICIPALITY

TABLE E.1: INITIAL SUMMARY OBLIGATIONS BY MUNICIPALITY

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Allendale borough	Bergen	1	137	14	81	232
Alpine borough	Bergen	1	214	2	127	343
Bergenfield borough	Bergen	1	87	60	0	147
Bogota borough	Bergen	1	13	0	0	13
Carlstadt borough	Bergen	1	227	32	89	348
Cliffside Park borough	Bergen	1	28	11	0	39
Closter borough	Bergen	1	110	0	126	236
Cresskill borough	Bergen	1	70	40	290	400
Demarest borough	Bergen	1	66	0	106	172
Dumont borough	Bergen	1	33	3	0	36
East Rutherford borough	Bergen	1	90	175	12	277
Edgewater borough	Bergen	1	28	0	213	241
Elmwood Park borough	Bergen	1	54	40	7	101
Emerson borough	Bergen	1	74	53	64	191
Englewood city	Bergen	1	152	247	0	399
Englewood Cliffs borough	Bergen	1	219	0	294	513
Fair Lawn borough	Bergen	1	152	108	0	260
Fairview borough	Bergen	1	20	115	0	135
Fort Lee borough	Bergen	1	181	248	158	587
Franklin Lakes borough	Bergen	1	358	30	377	765
Garfield city	Bergen	1	0	0	0	0
Glen Rock borough	Bergen	1	118	13	48	179
Hackensack city	Bergen	1	201	0	0	201
Harrington Park borough	Bergen	1	56	4	104	164
Hasbrouck Heights borough	Bergen	1	58	64	262	384
Haworth borough	Bergen	1	64	0	43	107
Hillsdale borough	Bergen	1	111	13	80	204
Ho-Ho-Kus borough	Bergen	1	83	10	100	193
Leonia borough	Bergen	1	30	71	124	225
Little Ferry borough	Bergen	1	28	23	0	51
Lodi borough	Bergen	1	0	63	0	63
Lyndhurst township	Bergen	1	100	151	0	251
Mahwah township	Bergen	1	350	64	86	500
Maywood borough	Bergen	1	36	25	3	64

¹⁰⁶ Note that the initial summary obligations include the full unadjusted Prior Round (1987-1999) obligations for each municipality as initially assigned by COAH in 1993. Municipalities can then reduce that initial obligation through the demonstration of applicable adjustments, housing activity and credits on a case by case basis in their efforts to secure approvals of their affordable housing plans.

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Midland Park borough	Bergen	1	54	23	34	111
Montvale borough	Bergen	1	255	2	303	560
Moonachie borough	Bergen	1	95	28	35	158
New Milford borough	Bergen	1	23	36	8	67
North Arlington borough	Bergen	1	4	67	0	71
Northvale borough	Bergen	1	86	3	53	142
Norwood borough	Bergen	1	118	0	71	189
Oakland borough	Bergen	1	220	24	29	273
Old Tappan borough	Bergen	1	98	9	257	364
Oradell borough	Bergen	1	89	14	18	121
Palisades Park borough	Bergen	1	0	125	80	205
Paramus borough	Bergen	1	698	133	529	1,360
Park Ridge borough	Bergen	1	111	108	66	285
Ramsey borough	Bergen	1	189	50	86	325
Ridgefield borough	Bergen	1	47	133	74	254
Ridgefield Park village	Bergen	1	25	29	0	54
Ridgewood village	Bergen	1	229	4	244	477
River Edge borough	Bergen	1	73	24	0	97
River Vale township	Bergen	1	121	19	78	218
Rochelle Park township	Bergen	1	63	0	17	80
Rockleigh borough	Bergen	1	84	0	14	98
Rutherford borough	Bergen	1	95	159	115	369
Saddle Brook township	Bergen	1	127	36	8	171
Saddle River borough	Bergen	1	162	43	214	419
South Hackensack township	Bergen	1	50	55	48	153
Teaneck township	Bergen	1	192	79	390	661
Tenafly borough	Bergen	1	159	21	202	382
Teterboro borough	Bergen	1	106	0	6	112
Upper Saddle River borough	Bergen	1	206	7	308	521
Waldwick borough	Bergen	1	81	41	0	122
Wallington borough	Bergen	1	5	0	0	5
Washington township	Bergen	1	85	0	156	241
Westwood borough	Bergen	1	87	50	23	160
Woodcliff Lake borough	Bergen	1	170	16	257	443
Wood-Ridge borough	Bergen	1	38	0	0	38
Wyckoff township	Bergen	1	221	31	225	477
Bayonne city	Hudson	1	0	845	155	1,000
East Newark borough	Hudson	1	3	8	20	31
Guttenberg town	Hudson	1	23	0	0	23
Harrison town	Hudson	1	30	248	397	675
Hoboken city	Hudson	1	0	0	0	0
Jersey City	Hudson	1	0	4,372	1,211	5,583
Kearny town	Hudson	1	211	227	481	919

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
North Bergen township	Hudson	1	0	793	134	927
Secaucus town	Hudson	1	590	54	399	1,043
Union City	Hudson	1	0	1,000	0	1,000
Weehawken township	Hudson	1	3	54	0	57
West New York town	Hudson	1	0	405	0	405
Bloomingtondale borough	Passaic	1	168	56	0	224
Clifton city	Passaic	1	379	1,000	0	1,379
Haledon borough	Passaic	1	5	0	0	5
Hawthorne borough	Passaic	1	58	34	0	92
Little Falls township	Passaic	1	101	152	42	295
North Haledon borough	Passaic	1	92	0	115	207
Passaic city	Passaic	1	0	1,000	0	1,000
Paterson city	Passaic	1	0	1,000	0	1,000
Pompton Lakes borough	Passaic	1	102	0	0	102
Prospect Park borough	Passaic	1	0	0	0	0
Ringwood borough	Passaic	1	51	0	0	51
Totowa borough	Passaic	1	247	137	147	531
Wanaque borough	Passaic	1	332	4	0	336
Wayne township	Passaic	1	1,158	272	567	1,997
West Milford township	Passaic	1	98	0	0	98
Woodland Park borough	Passaic	1	146	246	116	508
Andover borough	Sussex	1	7	0	0	7
Andover township	Sussex	1	55	7	183	245
Branchville borough	Sussex	1	13	1	75	89
Byram township	Sussex	1	33	28	43	104
Frankford township	Sussex	1	36	31	49	116
Franklin borough	Sussex	1	9	1	0	10
Fredon township	Sussex	1	29	23	99	151
Green township	Sussex	1	20	0	0	20
Hamburg borough	Sussex	1	14	0	0	14
Hampton township	Sussex	1	44	8	35	87
Hardyston township	Sussex	1	18	20	399	437
Hopatcong borough	Sussex	1	93	0	0	93
Lafayette township	Sussex	1	27	0	89	116
Montague township	Sussex	1	9	0	0	9
Newton town	Sussex	1	24	172	131	327
Ogdensburg borough	Sussex	1	13	0	0	13
Sandyston township	Sussex	1	13	0	0	13
Sparta township	Sussex	1	76	0	0	76
Stanhope borough	Sussex	1	15	0	0	15
Stillwater township	Sussex	1	15	0	23	38
Sussex borough	Sussex	1	0	0	0	0
Vernon township	Sussex	1	60	43	8	111

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Walpack township	Sussex	1	0	0	0	0
Wantage township	Sussex	1	35	0	0	35
Belleville township	Essex	2	0	101	0	101
Bloomfield township	Essex	2	0	0	0	0
Caldwell borough	Essex	2	0	14	7	21
Cedar Grove township	Essex	2	70	15	24	109
City of Orange township	Essex	2	0	38	0	38
East Orange city	Essex	2	0	0	0	0
Essex Fells borough	Essex	2	40	0	38	78
Fairfield township	Essex	2	318	45	71	434
Glen Ridge borough	Essex	2	28	0	0	28
Irvington township	Essex	2	0	0	0	0
Livingston township	Essex	2	375	14	80	469
Maplewood township	Essex	2	51	0	0	51
Millburn township	Essex	2	261	137	274	672
Montclair township	Essex	2	0	0	0	0
Newark city	Essex	2	0	0	0	0
North Caldwell borough	Essex	2	63	34	19	116
Nutley township	Essex	2	29	141	0	170
Roseland borough	Essex	2	182	0	49	231
S. Orange Village township	Essex	2	63	0	207	270
Verona township	Essex	2	24	0	0	24
West Caldwell township	Essex	2	200	46	51	297
West Orange township	Essex	2	226	84	0	310
Boonton town	Morris	2	11	16	0	27
Boonton township	Morris	2	20	23	10	53
Butler borough	Morris	2	16	0	0	16
Chatham borough	Morris	2	77	0	62	139
Chatham township	Morris	2	83	56	208	347
Chester borough	Morris	2	16	11	50	77
Chester township	Morris	2	32	28	8	68
Denville township	Morris	2	325	0	0	325
Dover town	Morris	2	6	99	0	105
East Hanover township	Morris	2	262	35	101	398
Florham Park borough	Morris	2	326	68	506	900
Hanover township	Morris	2	356	28	99	483
Harding township	Morris	2	83	0	107	190
Jefferson township	Morris	2	69	0	0	69
Kinnelon borough	Morris	2	73	0	28	101
Lincoln Park borough	Morris	2	74	10	26	110
Long Hill township	Morris	2	62	14	16	92
Madison borough	Morris	2	86	5	71	162
Mendham borough	Morris	2	25	10	33	68

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Mendham township	Morris	2	41	23	68	132
Mine Hill township	Morris	2	61	0	0	61
Montville township	Morris	2	261	17	49	327
Morris township	Morris	2	293	28	294	615
Morris Plains borough	Morris	2	144	32	9	185
Morristown town	Morris	2	227	140	41	408
Mountain Lakes borough	Morris	2	80	1	47	128
Mount Arlington borough	Morris	2	17	1	0	18
Mount Olive township	Morris	2	45	0	0	45
Netcong borough	Morris	2	0	0	0	0
Parsippany-Troy Hills twp	Morris	2	663	0	0	663
Pequannock township	Morris	2	134	76	5	215
Randolph township	Morris	2	261	0	0	261
Riverdale borough	Morris	2	58	0	0	58
Rockaway borough	Morris	2	43	17	38	98
Rockaway township	Morris	2	370	0	0	370
Roxbury township	Morris	2	255	0	0	255
Victory Gardens borough	Morris	2	0	0	0	0
Washington township	Morris	2	66	10	7	83
Wharton borough	Morris	2	42	85	0	127
Berkeley Heights township	Union	2	183	9	193	385
Clark township	Union	2	92	37	122	251
Cranford township	Union	2	148	98	64	310
Elizabeth city	Union	2	0	1,000	0	1,000
Fanwood borough	Union	2	45	17	20	82
Garwood borough	Union	2	18	40	56	114
Hillside township	Union	2	0	203	0	203
Kenilworth borough	Union	2	83	0	58	141
Linden city	Union	2	209	470	117	796
Mountainside borough	Union	2	123	138	4	265
New Providence borough	Union	2	135	63	31	229
Plainfield city	Union	2	0	403	0	403
Rahway city	Union	2	70	115	98	283
Roselle borough	Union	2	0	108	0	108
Roselle Park borough	Union	2	0	81	88	169
Scotch Plains township	Union	2	182	101	85	368
Springfield township	Union	2	135	0	78	213
Summit city	Union	2	171	172	127	470
Union township	Union	2	234	410	203	847
Westfield town	Union	2	139	76	140	355
Winfield township	Union	2	0	22	7	29
Allamuchy township	Warren	2	13	55	19	87
Alpha borough	Warren	2	13	7	0	20

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Belvidere town	Warren	2	0	1	0	1
Blairstown township	Warren	2	12	0	3	15
Franklin township	Warren	2	11	0	4	15
Frelinghuysen township	Warren	2	6	0	51	57
Greenwich township	Warren	2	41	0	24	65
Hackettstown town	Warren	2	62	135	90	287
Hardwick township	Warren	2	6	0	0	6
Harmony township	Warren	2	47	0	0	47
Hope township	Warren	2	8	0	0	8
Independence township	Warren	2	10	0	0	10
Knowlton township	Warren	2	14	0	0	14
Liberty township	Warren	2	7	0	0	7
Lopatcong township	Warren	2	56	0	0	56
Mansfield township	Warren	2	3	20	100	123
Oxford township	Warren	2	2	0	0	2
Phillipsburg town	Warren	2	0	0	0	0
Pohatcong township	Warren	2	47	8	0	55
Washington borough	Warren	2	0	0	0	0
Washington township	Warren	2	48	0	0	48
White township	Warren	2	16	60	51	127
Alexandria township	Hunterdon	3	22	25	0	47
Bethlehem township	Hunterdon	3	42	0	0	42
Bloomsbury borough	Hunterdon	3	17	0	0	17
Califon borough	Hunterdon	3	21	0	0	21
Clinton town	Hunterdon	3	51	0	0	51
Clinton township	Hunterdon	3	335	0	0	335
Delaware township	Hunterdon	3	23	20	0	43
East Amwell township	Hunterdon	3	40	0	0	40
Flemington borough	Hunterdon	3	38	77	43	158
Franklin township	Hunterdon	3	36	0	59	95
Frenchtown borough	Hunterdon	3	2	0	0	2
Glen Gardner borough	Hunterdon	3	7	0	0	7
Hampton borough	Hunterdon	3	2	0	0	2
High Bridge borough	Hunterdon	3	27	0	0	27
Holland township	Hunterdon	3	17	45	0	62
Kingwood township	Hunterdon	3	19	0	0	19
Lambertville city	Hunterdon	3	0	58	0	58
Lebanon borough	Hunterdon	3	34	0	0	34
Lebanon township	Hunterdon	3	28	0	0	28
Milford borough	Hunterdon	3	5	0	0	5
Raritan township	Hunterdon	3	360	34	13	407
Readington township	Hunterdon	3	394	130	153	677
Stockton borough	Hunterdon	3	6	0	0	6

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Tewksbury township	Hunterdon	3	119	0	42	161
Union township	Hunterdon	3	78	1	207	286
West Amwell township	Hunterdon	3	16	0	19	35
Carteret borough	Middlesex	3	0	117	196	313
Cranbury township	Middlesex	3	217	3	81	301
Dunellen borough	Middlesex	3	0	1	61	62
East Brunswick township	Middlesex	3	648	90	417	1,155
Edison township	Middlesex	3	965	647	353	1,965
Helmetta borough	Middlesex	3	26	0	0	26
Highland Park borough	Middlesex	3	0	79	433	512
Jamesburg borough	Middlesex	3	8	37	104	149
Metuchen borough	Middlesex	3	99	81	118	298
Middlesex borough	Middlesex	3	105	77	178	360
Milltown borough	Middlesex	3	64	39	31	134
Monroe township	Middlesex	3	554	106	894	1,554
New Brunswick city	Middlesex	3	0	1,000	0	1,000
North Brunswick township	Middlesex	3	395	223	218	836
Old Bridge township	Middlesex	3	438	210	500	1,148
Perth Amboy city	Middlesex	3	0	455	0	455
Piscataway township	Middlesex	3	736	317	277	1,330
Plainsboro township	Middlesex	3	205	6	539	750
Sayreville borough	Middlesex	3	261	150	267	678
South Amboy city	Middlesex	3	0	41	16	57
South Brunswick township	Middlesex	3	842	130	237	1,209
South Plainfield borough	Middlesex	3	379	56	305	740
South River borough	Middlesex	3	0	175	173	348
Spotswood borough	Middlesex	3	48	12	100	160
Woodbridge township	Middlesex	3	955	417	583	1,955
Bedminster township	Somerset	3	154	1	97	252
Bernards township	Somerset	3	508	34	411	953
Bernardsville borough	Somerset	3	127	0	69	196
Bound Brook borough	Somerset	3	0	0	0	0
Branchburg township	Somerset	3	302	2	25	329
Bridgewater township	Somerset	3	713	126	76	915
Far Hills borough	Somerset	3	38	2	19	59
Franklin township	Somerset	3	766	0	0	766
Green Brook township	Somerset	3	151	4	0	155
Hillsborough township	Somerset	3	461	57	0	518
Manville borough	Somerset	3	0	169	0	169
Millstone borough	Somerset	3	21	0	31	52
Montgomery township	Somerset	3	307	76	157	540
North Plainfield borough	Somerset	3	0	50	0	50
Peapack & Gladstone bor.	Somerset	3	82	0	0	82

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁵
Raritan borough	Somerset	3	82	41	83	206
Rocky Hill borough	Somerset	3	25	0	17	42
Somerville borough	Somerset	3	153	109	14	276
South Bound Brook borough	Somerset	3	0	0	0	0
Warren township	Somerset	3	543	59	173	775
Watchung borough	Somerset	3	206	19	101	326
East Windsor township	Mercer	4	367	65	20	452
Ewing township	Mercer	4	481	128	101	710
Hamilton township	Mercer	4	706	539	358	1,603
Hightstown borough	Mercer	4	45	16	0	61
Hopewell borough	Mercer	4	29	18	16	63
Hopewell township	Mercer	4	520	0	102	622
Lawrence township	Mercer	4	891	60	58	1,009
Pennington borough	Mercer	4	52	55	0	107
Princeton	Mercer	4	641	91	98	830
Robbinsville township	Mercer	4	293	20	64	377
Trenton city	Mercer	4	0	73	0	73
West Windsor township	Mercer	4	899	105	0	1,004
Aberdeen township	Monmouth	4	270	0	0	270
Allenhurst borough	Monmouth	4	50	4	6	60
Allentown borough	Monmouth	4	28	0	0	28
Asbury Park city	Monmouth	4	0	260	28	288
Atlantic Highlands borough	Monmouth	4	86	62	0	148
Avon-by-the-Sea borough	Monmouth	4	20	0	20	40
Belmar borough	Monmouth	4	59	54	100	213
Bradley Beach borough	Monmouth	4	20	13	51	84
Brielle borough	Monmouth	4	159	11	6	176
Colts Neck township	Monmouth	4	218	14	16	248
Deal borough	Monmouth	4	54	2	14	70
Eatontown borough	Monmouth	4	504	116	34	654
Englishtown borough	Monmouth	4	65	0	0	65
Fair Haven borough	Monmouth	4	135	0	27	162
Farmingdale borough	Monmouth	4	19	2	9	30
Freehold borough	Monmouth	4	188	78	0	266
Freehold township	Monmouth	4	1,036	0	0	1,036
Hazlet township	Monmouth	4	407	0	0	407
Highlands borough	Monmouth	4	20	0	0	20
Holmdel township	Monmouth	4	768	19	0	787
Howell township	Monmouth	4	955	0	0	955
Interlaken borough	Monmouth	4	40	3	7	50
Keansburg borough	Monmouth	4	0	0	0	0
Keyport borough	Monmouth	4	1	0	0	1
Lake Como borough	Monmouth	4	31	3	51	85

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Little Silver borough	Monmouth	4	197	7	10	214
Loch Arbour village	Monmouth	4	30	0	8	38
Long Branch city	Monmouth	4	0	311	299	610
Manalapan township	Monmouth	4	706	0	0	706
Manasquan borough	Monmouth	4	149	0	59	208
Marlboro township	Monmouth	4	1,019	0	0	1,019
Matawan borough	Monmouth	4	141	0	0	141
Middletown township	Monmouth	4	1,561	0	0	1,561
Millstone township	Monmouth	4	81	0	0	81
Monmouth Beach borough	Monmouth	4	70	0	32	102
Neptune township	Monmouth	4	0	73	0	73
Neptune City borough	Monmouth	4	33	13	27	73
Ocean township	Monmouth	4	873	81	19	973
Oceanport borough	Monmouth	4	149	0	22	171
Red Bank borough	Monmouth	4	428	126	0	554
Roosevelt borough	Monmouth	4	29	0	0	29
Rumson borough	Monmouth	4	268	26	67	361
Sea Bright borough	Monmouth	4	37	11	23	71
Sea Girt borough	Monmouth	4	115	0	45	160
Shrewsbury borough	Monmouth	4	277	10	20	307
Shrewsbury township	Monmouth	4	12	0	0	12
Spring Lake borough	Monmouth	4	132	12	41	185
Spring Lake Heights bor.	Monmouth	4	76	20	65	161
Tinton Falls borough	Monmouth	4	622	7	0	629
Union Beach borough	Monmouth	4	83	0	0	83
Upper Freehold township	Monmouth	4	43	23	0	66
Wall township	Monmouth	4	1,073	105	78	1,256
West Long Branch borough	Monmouth	4	219	14	18	251
Barneгат township	Ocean	4	329	63	7	399
Barneгат Light borough	Ocean	4	83	12	0	95
Bay Head borough	Ocean	4	65	1	12	78
Beach Haven borough	Ocean	4	70	3	27	100
Beachwood borough	Ocean	4	123	0	0	123
Berkeley township	Ocean	4	610	0	0	610
Brick township	Ocean	4	930	262	0	1,192
Eagleswood township	Ocean	4	36	0	5	41
Harvey Cedars borough	Ocean	4	44	3	4	51
Island Heights borough	Ocean	4	31	3	23	57
Jackson township	Ocean	4	1,247	56	74	1,377
Lacey township	Ocean	4	580	48	0	628
Lakehurst borough	Ocean	4	66	0	0	66
Lakewood township	Ocean	4	0	533	412	945
Lavallette borough	Ocean	4	82	0	33	115

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Little Egg Harbor township	Ocean	4	194	0	0	194
Long Beach township	Ocean	4	41	16	65	122
Manchester township	Ocean	4	370	0	0	370
Mantoloking borough	Ocean	4	60	0	19	79
Ocean township	Ocean	4	236	6	74	316
Ocean Gate borough	Ocean	4	12	0	0	12
Pine Beach borough	Ocean	4	41	0	0	41
Plumsted township	Ocean	4	47	14	44	105
Point Pleasant borough	Ocean	4	343	11	80	434
Point Pleasant Beach bor.	Ocean	4	167	36	64	267
Seaside Heights borough	Ocean	4	0	79	0	79
Seaside Park borough	Ocean	4	52	30	19	101
Ship Bottom borough	Ocean	4	71	0	57	128
South Toms River borough	Ocean	4	51	0	0	51
Stafford township	Ocean	4	555	114	0	669
Surf City borough	Ocean	4	49	3	22	74
Toms River township	Ocean	4	2,233	296	111	2,640
Tuckerton borough	Ocean	4	69	0	0	69
Bass River township	Burlington	5	15	0	1	16
Beverly city	Burlington	5	18	0	0	18
Bordentown city	Burlington	5	33	19	0	52
Bordentown township	Burlington	5	211	0	0	211
Burlington city	Burlington	5	89	0	0	89
Burlington township	Burlington	5	445	27	108	580
Chesterfield township	Burlington	5	55	7	0	62
Cinnaminson township	Burlington	5	331	9	32	372
Delanco township	Burlington	5	61	0	0	61
Delran township	Burlington	5	208	0	0	208
Eastampton township	Burlington	5	49	0	140	189
Edgewater Park township	Burlington	5	30	2	0	32
Evesham township	Burlington	5	534	80	126	740
Fieldsboro borough	Burlington	5	19	0	0	19
Florence township	Burlington	5	114	45	0	159
Hainesport township	Burlington	5	150	0	74	224
Lumberton township	Burlington	5	152	0	0	152
Mansfield township	Burlington	5	114	0	0	114
Maple Shade township	Burlington	5	0	0	0	0
Medford township	Burlington	5	418	14	131	563
Medford Lakes borough	Burlington	5	60	0	0	60
Moorestown township	Burlington	5	621	27	151	799
Mount Holly township	Burlington	5	0	13	29	42
Mount Laurel township	Burlington	5	815	50	116	981
New Hanover township	Burlington	5	4	0	152	156

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
North Hanover township	Burlington	5	1	0	242	243
Palmyra borough	Burlington	5	39	0	0	39
Pemberton borough	Burlington	5	9	0	42	51
Pemberton township	Burlington	5	0	0	0	0
Riverside township	Burlington	5	6	0	0	6
Riverton borough	Burlington	5	15	0	16	31
Shamong township	Burlington	5	84	25	46	155
Southampton township	Burlington	5	85	25	17	127
Springfield township	Burlington	5	54	3	13	70
Tabernacle township	Burlington	5	106	0	34	140
Washington township	Burlington	5	11	0	0	11
Westampton township	Burlington	5	221	0	0	221
Willingboro township	Burlington	5	268	0	0	268
Woodland township	Burlington	5	19	2	38	59
Wrightstown borough	Burlington	5	10	0	0	10
Audubon borough	Camden	5	0	61	70	131
Audubon Park borough	Camden	5	4	0	8	12
Barrington borough	Camden	5	8	20	119	147
Bellmawr borough	Camden	5	107	31	107	245
Berlin borough	Camden	5	154	43	97	294
Berlin township	Camden	5	109	46	130	285
Brooklawn borough	Camden	5	23	0	0	23
Camden city	Camden	5	0	269	0	269
Cherry Hill township	Camden	5	1,829	325	581	2,735
Chesilhurst borough	Camden	5	28	7	0	35
Clementon borough	Camden	5	19	61	10	90
Collingswood borough	Camden	5	0	51	355	406
Gibbsboro borough	Camden	5	112	25	18	155
Gloucester township	Camden	5	359	117	120	596
Gloucester City	Camden	5	0	0	0	0
Haddon township	Camden	5	35	46	197	278
Haddonfield borough	Camden	5	192	10	88	290
Haddon Heights borough	Camden	5	23	19	88	130
Hi-Nella borough	Camden	5	0	0	0	0
Laurel Springs borough	Camden	5	17	0	0	17
Lawnside borough	Camden	5	33	0	0	33
Lindenwold borough	Camden	5	0	0	0	0
Magnolia borough	Camden	5	22	18	25	65
Merchantville borough	Camden	5	0	0	70	70
Mount Ephraim borough	Camden	5	33	0	0	33
Oaklyn borough	Camden	5	1	13	43	57
Pennsauken township	Camden	5	0	167	23	190
Pine Hill borough	Camden	5	22	11	21	54

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Pine Valley borough	Camden	5	47	0	0	47
Runnemede borough	Camden	5	40	33	79	152
Somerdale borough	Camden	5	95	0	217	312
Stratford borough	Camden	5	70	15	46	131
Tavistock borough	Camden	5	80	0	0	80
Voorhees township	Camden	5	456	239	305	1,000
Waterford township	Camden	5	102	0	132	234
Winslow township	Camden	5	377	51	248	676
Woodlynne borough	Camden	5	0	0	0	0
Clayton borough	Gloucester	5	94	44	114	252
Deptford township	Gloucester	5	522	87	243	852
East Greenwich township	Gloucester	5	252	6	0	258
Elk township	Gloucester	5	127	4	57	188
Franklin township	Gloucester	5	166	51	116	333
Glassboro borough	Gloucester	5	0	13	376	389
Greenwich township	Gloucester	5	308	0	44	352
Harrison township	Gloucester	5	198	0	64	262
Logan township	Gloucester	5	454	0	198	652
Mantua township	Gloucester	5	292	56	112	460
Monroe township	Gloucester	5	439	90	215	744
National Park borough	Gloucester	5	28	6	10	44
Newfield borough	Gloucester	5	14	0	0	14
Paulsboro borough	Gloucester	5	0	62	0	62
Pitman borough	Gloucester	5	40	36	14	90
South Harrison township	Gloucester	5	31	0	30	61
Swedesboro borough	Gloucester	5	23	22	21	66
Washington township	Gloucester	5	507	173	146	826
Wenonah borough	Gloucester	5	30	0	1	31
West Deptford township	Gloucester	5	368	15	247	630
Westville borough	Gloucester	5	27	0	0	27
Woodbury city	Gloucester	5	0	16	57	73
Woodbury Heights borough	Gloucester	5	55	5	0	60
Woolwich township	Gloucester	5	209	0	0	209
Absecon city	Atlantic	6	144	0	0	144
Atlantic City	Atlantic	6	2,458	0	0	2,458
Brigantine city	Atlantic	6	124	0	0	124
Buena borough	Atlantic	6	41	0	0	41
Buena Vista township	Atlantic	6	19	0	0	19
Corbin City	Atlantic	6	13	0	0	13
Egg Harbor township	Atlantic	6	763	0	0	763
Egg Harbor City	Atlantic	6	42	0	0	42
Estell Manor city	Atlantic	6	21	0	0	21
Folsom borough	Atlantic	6	20	0	0	20

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Galloway township	Atlantic	6	328	0	0	328
Hamilton township	Atlantic	6	349	0	0	349
Hammonton town	Atlantic	6	257	0	0	257
Linwood city	Atlantic	6	140	0	0	140
Longport borough	Atlantic	6	59	0	0	59
Margate City	Atlantic	6	97	0	0	97
Mullica township	Atlantic	6	40	0	0	40
Northfield city	Atlantic	6	190	0	0	190
Pleasantville city	Atlantic	6	0	0	0	0
Port Republic city	Atlantic	6	19	0	0	19
Somers Point city	Atlantic	6	103	0	0	103
Ventnor City	Atlantic	6	27	0	0	27
Weymouth township	Atlantic	6	15	0	0	15
Avalon borough	Cape May	6	234	0	0	234
Cape May city	Cape May	6	58	0	0	58
Cape May Point borough	Cape May	6	34	0	0	34
Dennis township	Cape May	6	220	0	0	220
Lower township	Cape May	6	324	0	0	324
Middle township	Cape May	6	454	0	0	454
North Wildwood city	Cape May	6	80	0	0	80
Ocean City	Cape May	6	411	0	0	411
Sea Isle City	Cape May	6	109	0	0	109
Stone Harbor borough	Cape May	6	141	0	0	141
Upper township	Cape May	6	317	0	0	317
West Cape May borough	Cape May	6	7	0	0	7
West Wildwood borough	Cape May	6	33	0	0	33
Wildwood city	Cape May	6	0	0	0	0
Wildwood Crest borough	Cape May	6	42	0	0	42
Woodbine borough	Cape May	6	88	0	0	88
Bridgeton city	Cumberland	6	0	0	0	0
Commercial township	Cumberland	6	45	0	0	45
Deerfield township	Cumberland	6	41	0	0	41
Downe township	Cumberland	6	10	0	0	10
Fairfield township	Cumberland	6	79	0	0	79
Greenwich township	Cumberland	6	13	0	0	13
Hopewell township	Cumberland	6	114	0	0	114
Lawrence township	Cumberland	6	10	0	0	10
Maurice River township	Cumberland	6	22	0	0	22
Millville city	Cumberland	6	0	0	0	0
Shiloh borough	Cumberland	6	7	0	0	7
Stow Creek township	Cumberland	6	14	0	0	14
Upper Deerfield township	Cumberland	6	242	0	0	242
Vineland city	Cumberland	6	0	0	0	0

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation ¹⁰⁶
Alloway township	Salem	6	17	0	0	17
Carneys Point township	Salem	6	184	0	0	184
Elmer borough	Salem	6	12	0	0	12
Elsinboro township	Salem	6	26	0	0	26
Lower Alloways Creek twp	Salem	6	26	0	0	26
Mannington township	Salem	6	19	0	0	19
Oldmans township	Salem	6	184	0	0	184
Penns Grove borough	Salem	6	0	0	0	0
Pennsville township	Salem	6	228	0	0	228
Pilesgrove township	Salem	6	35	0	0	35
Pittsgrove township	Salem	6	58	0	0	58
Quinton township	Salem	6	15	0	0	15
Salem city	Salem	6	0	0	0	0
Upper Pittsgrove township	Salem	6	27	0	0	27
Woodstown borough	Salem	6	8	0	0	8



**ECONSULT SOLUTIONS, INC.
ANALYSIS OF THE GAP PERIOD
(1999 – 2015)**



February 8, 2016

REPORT SUBMITTED BY:
Econsult Solutions
1435 Walnut Street
Philadelphia, PA 19102



Peter A. Angelides, Ph.D., AICP
Principal



INTRODUCTION

This report addresses one of the central issues to calculating fair share need in response to the Mt. Laurel IV ruling – how to treat the “gap period.” ESI’s analysis indicates that there is no affordable housing need or obligation from the gap period, whereas other parties have identified and quantified a need from the gap period.

Econsult Solutions, Inc. (ESI) addressed the issue of affordable housing need and obligation arising from the gap period from 1999 – 2015 in both our December 8, 2015 expert submission to the Court in Ocean County (entitled *Econsult Solutions Inc. Response to Ocean County Third Revised Case Management Order*) and in Section 7 of our methodology report (entitled *New Jersey Affordable Housing Need and Obligations*).

Subsequent to the preparation of those documents, ESI has had the opportunity to review the analysis of Regional Master Richard Reading with respect to the gap period submitted to the Court on December 29th. We have further reviewed a series of submissions from the Fair Share Housing Center (FSHC), New Jersey Builders Association (NJBA), Highview Homes LLC (“Highview”) and their respective experts, including briefs and submissions to the court on December 8th, responses to the Reading report from early January, proposed methodologies for calculating gap period obligations on Jan 22nd, and response reports to the ESI methodology report submitted on January 29th. ESI was also present for a substantial part of the oral argument on the gap argument on January 7, 2016 in Ocean County Superior Court and has reviewed a transcript of the final portion of the proceedings on that day.

Our submission and report establish a consistent treatment of affordable housing need and obligation arising from prior periods, built on straightforward logical principles and analysis and a plain reading of the text of the Fair Housing Act (FHA). Our analysis also incorporates the Supreme Court’s rulings in In re Adoption of N.J.A.C. 5:96 & 5:97 by the New Jersey Council on Affordable Hous., 221 N.J. 1,30 (2015) (“Mount Laurel IV”), which repeatedly relied on the FHA for guidance and which required municipalities to address the prior round obligations COAH had established as the second round obligations. Our analysis that the “gap period” from 1999 – 2015 yields **no legal affordable housing obligation nor identifiable additive housing need** within the FHA framework and the requirements of Mount Laurel IV remains unchanged.

Our analysis of the gap period necessarily includes a mix of analytical principles and precedent from relevant statutes, court decisions, and prior round regulations. This is also true of our entire methodology for calculating affordable housing need and obligations. We are not lawyers, but the task of updating and calculating such a methodology in accordance with the directives of the Supreme Court necessarily involves reckoning with the relevant legal and analytical precedents.

This report proceeds in several parts. After the summary of the overall conclusions, the report analyzes the issues in more detail:

- It provides an overview of gap period and the underlying principals;
- It responds directly to issues raised about the gap period in various submissions;
- It analyzes Dr. Kinsey's proposed (and inappropriate) methods for calculating a gap period obligation; and
- It shows how facts provided by Dr. Kinsey's gap period calculation directly contradict his preferred fair share model.

This report addresses issues pertaining to the gap period only. It does not address any additional issues raised by the same parties in their January 29 responses to other aspects of ESI's methodology, which will be addressed in a forthcoming rebuttal report.

SUMMARY

ESI's Analysis

The premise of the ESI analysis is that the object is to determine the Present Need and Prospective Need as accurately as possible. ESI's December 8th expert submission and *New Jersey Affordable Housing Need and Obligation* report set forth a consistent analysis as to why the calculation and addition of housing need emerging from the gap period to current affordable housing obligations is inappropriate. Those principles, stated simply, are follows:

- The Prospective Need period covers ten years, is forward-facing, and relates to affordable housing need attributable to likely development and growth;
- Present Need represents all currently identifiable affordable housing need, and by design and by definition incorporates all prior population, household and housing characteristics;
- Present Need and Prospective Need comprise all affordable housing need under the FHA framework. Therefore, no legally assigned obligation nor identifiable current affordable housing need arises from the gap period; and
- Attempts to calculate housing "need" from that time period based on the retrospective application of a Prospective Need methodology do not accurately describe housing need as of today.

Response to Issues Raised

FSHC, NJBA, Highview and their respective experts have offered briefs on the gap period, through submissions to the Court on December 8, 2015 and additional responses to the December 29, 2015 report of Regional Special Master Richard Reading summarizing and commenting on the Master's Report and, on January 22, 2016, providing additional calculations on the gap period. For all of those

voluminous submissions, little response has been offered that bears on the clear logical and analytical framework set forth in the ESI submission and methodology report. Rather, these submissions fail to reconcile with the core principle that a retrospective calculation of “need” arising from a prior time period is not appropriate within the FHA framework, and that a calculation of “residual need” from the gap period would be both speculative and outside of existing methodologies.

The core failing of the approach of FSHC is their inability to account for the current housing conditions of New Jersey's LMI households. As set out in our prior submissions, some LMI households emerging during this period are living in inadequate housing, and are captured within the Present Need. Those that are living in sound housing do not represent a currently identifiable housing need under the FHA framework. These households are indistinguishable from every other LMI household living in sound housing in New Jersey which formed or became LMI prior to 1999 with regard to their current income and housing status, and thus their treatment under the FHA. Nonetheless, as explained below, the justification advanced by FSHC and NJBA for a gap period attribution of “need” treats LMI households emerging during the gap period differently from LMI households from before the gap period. For example, a cost-burdened LMI household created in 1998 currently living in sound housing would not be an identifiable need, but a cost-burdened LMI household created in 2002 current living in sound housing would be counted as part of the need. This differential treatment is without basis.

Flaws in Dr. Kinsey's Proposed Calculations

Rather than reckon with this fundamental issue, these gap period calculations are supplemented with arguments that a retrospective calculation using a Prospective Need methodology is appropriate despite its failure to accurately quantify affordable housing need as COAH has defined the need, which excludes cost-burdened households. These arguments include misleading analogies to prior round precedents and an attempt to obfuscate the clear overlap with the calculation of Present Need. Primarily, however, they focus on the issue of cost-burdened households, whose existence is positioned as direct evidence that the entirety of LMI household growth during the gap period represents a current housing need. We address this point at length, and demonstrate that the statistics on cost-burdened households presented by the expert for the NJBA do not in fact demonstrate this case. Further, we demonstrate that the use of cost-burden has no precedent in the fair share methodology, and that its exclusion is based on sound analytical principles set forth in 1984 in *AMG Realty vs. Warren Twp.* which are still true today.

More broadly, we discuss the impossibility of “rewinding the clock” and attempting to quantify a counterfactual scenario for the housing conditions of New Jersey's households since 1999 absent the administrative failings of COAH. In this point, we agree with Regional Master Richard Reading's assessment in his December 29 report that “the dynamic rather than static nature of the housing market defy an empirical calculation” and further, that such an assessment would be “speculative” and “would still be contrary to prior round methodologies” (15).

What is left, therefore, is the need that can be identified and quantified within the FHA framework, i.e. the Present Need and Prospective Need. We have done so rigorously and accurately in our methodology report. Attempts to generate additional calculations of need emerging from the gap period rely on faulty analytical principles and are inconsistent with the methodologies for quantifying affordable housing need within the FHA framework.

Finally, consideration attention is given to the “alternative calculation” of the gap period offered by Dr. Kinsey in his January 22, 2016 brief and its implications for the calculations set forth in the original Kinsey model. In his January 22nd submission, Dr. Kinsey explains that this alternative model is “based on changes in population, households, headship rates and housing market conditions that actually took place during 1999 – 2015” (2) and therefore represents his best estimate of current population and household characteristics as of 2015. Simultaneously, FSHC’s January 22, 2016 submission assures the Court that the original July 2015 Kinsey model still “best calculates Third Round obligations” (1), notwithstanding the alternative model submission.

It is instructive, therefore, to perform a simple mathematical comparison of these outputs to determine if the population and household growth required to achieve the 2025 projections of the Kinsey model are reasonable or realistic in relation to the current conditions as of 2015 estimated by Dr. Kinsey himself in his alternative gap period model. This simple comparison reveals that achieving Dr. Kinsey’s 2025 projections not only would require an acceleration of LMI household growth to nearly three times the annualized pace observed in the gap period, according to Dr. Kinsey’s own calculations, but would require more LMI household to be created than total households. The Kinsey model results are thus fundamentally inconsistent with Dr. Kinsey’s own calculation of the current reality of New Jersey’s households and their characteristics. This basic analysis demonstrates conclusively that the Kinsey model, the flawed assumptions of which have been detailed at length, does not and cannot serve as a reliable basis for the assignment of affordable housing obligations for the current cycle.

OVERVIEW OF GAP PERIOD AND RELEVANT PRINCIPLES

ESI’s December 8, 2015 submission and December 30, 2015 methodology report set forth the why it is neither appropriate nor possible to accurately calculate retrospective “need” arising from the gap period.

Prospective Need is Forward-Facing

The Fair Housing Act states that it is the duty of COAH to:

Adopt criteria and guidelines for...municipal determination of its present and prospective fair share of the housing need in a given region which shall be computed for a 10 year-period.

[N.J.S.A. 52:27D-307(c)(1), (emphasis added)]

Further, the definition of Prospective Need in the FHA is as follows:

Prospective need means a **projection** of housing needs based on development and growth which is reasonably likely to occur in a region or municipality...

[N.J.S.A. 52:27D-304(j), (emphasis added)]

This plain text, along with other precedents discussed in ESI's prior submissions and report, indicate that the Prospective Need is clearly defined on a forward-facing basis, based on incremental housing need anticipated to emerge in the future, rather than need that has emerged in the past or exists today. Therefore, Special Master Reading's December 29th report appropriately notes that the inclusion of a retrospective gap period in the calculation of Prospective Need is "contrary to the prior round methodologies, the language of the FHA, and the history of determining prior round needs" (Reading cover letter).

Dr. Kinsey appears to regard this distinction as merely semantic. His first gap calculation submitted to the Court on January 22nd simply truncates the 26 year Prospective Need period from his original methodology at 2015, arguing that this calculation is appropriate "as part of and subsumed by total LMI need for 1999-2025." His alternative approach does the Court the courtesy of incorporating data on "changes in population, housing and headship rates and housing market conditions that actually took place 1999-2015" (2) but still performs the calculation exactly as if the need were prospective.

This approach is non-responsive to the analytical challenges and precedent identified by the Regional Master. As that analysis makes clear, gap period "need" cannot simply be assessed as Prospective Need for 1999-2015 by another name. Dr. Kinsey's approach represents a slavish adherence to a particular interpretation of a formula at the expense of the facts.

The fundamental economic difference between the gap period and the 2015-2025 Prospective Need period is that the gap LMI households *currently have housing*, and the Prospective Need households do not. Thus, while incremental LMI household growth in the future gives rise to a quantifiable volume of affordable housing need over that future period, incremental LMI household growth in the past does not equate with housing need that needs to be satisfied as of today. Applying this forward-looking methodological approach retrospectively simply does not describe identifiable existing need in any meaningful sense.

Categories of Affordable Housing Need

ESI uses the term "identifiable existing need" and "FHA framework" to distinguish theoretical definitions of housing "need" from those identified as relevant to the calculation of affordable housing need and obligations under the Fair Housing Act, pursuant to the Mt. Laurel constitutional obligation. Individuals may vary on which households they would personally describe of as "in need" or housing, and any of a number of standards, including cost-burden, could be reasonably introduced into such a conversation. Fortunately, there is a clear standard and precedent as to which households do and do not constitute affordable housing need for which there is an obligation. As described in Section 7.1 of the ESI report:

The Fair Housing Act provides specific guidance on the categories need that comprise fair share housing obligations. The FHA provides for the determination of Present Need and Prospective Need at both the regional and municipal level, and does not define any additional categories of need beyond those two (N.J.S.A. 52:27d-301 et. seq.)...

Taken together, Present Need and Prospective Need completely describe the identifiable need for affordable housing within this framework, and any additional calculated *obligation* assigned above and beyond it does not change this *need*.

[ESI December 30 report, p. 87-88)

Said another way, the FHA requires satisfaction of the Present Need and Prospective Need, not the past, present and prospective need.

The ESI report goes on to describe the current housing circumstances of the incremental LMI households added to New Jersey within this “gap period” in relation to the Present Need and Prospective Need framework.

- If they are LMI households currently living in deficient housing in New Jersey, those new households are captured within Present Need.
- If they are LMI households currently living in adequate housing in New Jersey, they do not represent a currently identifiable need.

Therefore, as stated above, no additive need for the current cycle emerges for this group beyond what is already covered in Present Need and Prospective Need.

From the standpoint of accurately quantifying the need, these housing circumstances mirror those at the start of Round 1, or indeed any round. Then as now, Prospective Need is forward-facing, and Present Need by definition and design incorporates the contributions of all population shifts, income changes, housing market dynamics, and municipal affordable housing activities up to that time.

This methodological construction of Present Need, incorporating all existing housing conditions, and Prospective Need, incorporating all future housing conditions, is entirely reasonable in light of the practical impossibility of any other approach. A retroactive definition of need untethered from any current circumstances could be calculated and aggregated for any period of time back to the founding of the state. Such a calculation and accumulation of “need” could produce astronomical figures. Yet it would tell us nothing about the current need for affordable housing.

Dynamic Nature of Housing Market

The December 29 report issued by Regional Master Reading showed a clear recognition of the concept that current conditions supersede theoretical calculations of retrospective “need” using a Prospective Need methodology. His “Summary of Findings and Conclusions” rightly notes that those LMI households emerging during the gap period:

...would be partially included by the LMI households in over crowding or deficient housing units that are encompassed in the new calculation of Present Need. Those LMI households that have occupied sound non-deficient housing are already housing (housed) and would not represent an identified need.

[December 29 Reading Report to the Court, p. 14]

Beyond those specific conditions, the Regional Master's report recognizes the broader point that the housing market is "dynamic rather than static." This concept has implications for any attempt to "turn back the clock" to re-create conditions as if the past sixteen years have not occurred. Certainly, calculations which attempt to simply identify incremental LMI household growth from the period and label it as existing "need" fail to appreciate this distinction. More broadly, attempts to recreate what housing conditions "would have" occurred under a more effective COAH administrative regime are merely conjecture which fail to account for the responsive nature of the private housing market. Said another way, it is not the case that if additional deed-restricted affordable housing had been built during the past 16 years, all other housing market activity would be identical and the differential in affordable housing need could be plainly measured. As the Regional Master's report rightly concludes:

...practical difficulties and the dynamic rather than static nature of the housing market defy an empirical calculation of the affordable housing needs remaining from past years...although it might be possible to generate an estimate of such residual need, such an estimate would be speculative (and) would still be contrary to prior round methodologies...

[December 29 Reading Report to the Court, p. 15]

Some have argued that the relevant principle in analyzing the gap period is not housing need as identified today, but some quantification of LMI households negatively impacted by the administrative failings of COAH. Given the dynamic nature of the housing market (not to mention the related dynamic nature of employment, lifestyle preferences, etc.) **such a calculation would be, as Special Master Reading describes, impossibly speculative, in addition to being inconsistent with the FHA framework.**

A full analysis of this counter-factual would have to consider more than just the growth of LMI households. It would have to account for what would have happened had COAH offered viable rules for the 1999-2015 period. Such an analysis would have to answer a series of questions about what would have happened had COAH offered viable rules for the 1999 – 2015 period, such as:

- How many additional deed-restricted affordable units, if any, would have been built in the gap period?
- How many fewer market rate units would have been built between 1999 and 2015, if any, because of financial burdens caused by fair share requirements?
- How many additional private sector market units would have been displaced from the housing stock by newly constructed deed-restricted affordable housing units?
- Where and at what quality would these units have been built, and what impacts would their production have had on local real estate markets?

These represent just a sampling of known factors that would need to be addressed. The full range of implications is simply not known. We do know that none of these considerations, nor any others like

them, have been addressed in the analysis set forth by Dr. Kinsey and FSHC. We also agree with the characterization of the Special Master that attempts to produce a calculation of residual need through such a process are inherently speculative, and do not have a basis in the prior round methodology.

Actual Growth

Additional facts about the population and housing trends observed in New Jersey over this period illustrate the challenge in “rewinding the clock” in service of a theoretical analysis.

As a stark illustration of the dynamic nature of housing markets, recent history tells us that housing and commercial markets have taken very different directions from what was typically envisioned at the beginning of the gap period. Indeed, the basic assumptions underlying the Prior Round methods – that most of the growth was going to occur in the suburbs – has shifted. A study from the Bloustein School of Planning and Public Policy at Rutgers, “The Receding Metropolitan Perimeter: A New Postsuburban Demographic Normal” documents population shifts occurring in a four-state metropolitan region surrounding New York City encompassing 35 counties in Connecticut, New Jersey, New York and Pennsylvania.¹ The study found that:

Twenty-seven of the suburban-ring counties in the four states witnessed explosive growth in the 30-year period from 1950 to 1980, gaining more than 5.3 million residents, and nearly doubling their population. By contrast, the regional core of eight urban counties in New York and New Jersey contracted sharply during the same period, losing nearly a million people.

Then, during the 2010–2013 period, the trend reversed: the regional core grew at a rate more than double that of the suburban ring, adding 85,284 persons per year. The regional core accounted for most of the total population growth, a phenomenon unparalleled since World War II. All of the suburban counties with population losses were on the metropolitan outer ring with the exception of Monmouth County, which suffered impacts from Superstorm Sandy.

[Bloustein School of Public Policy, *The Receding Perimeter: A New Postsuburban Demographic Normal*]

The time frame for the first period of the study illustrates the economic background influencing the writing of the first round rules, while the second time frame is reflective of the conditions on the ground during the gap period. Housing and jobs are now growing faster in the urban core than in the outer ring, in many cases in communities that LMI households had been presumed to be trying to move from. The September 24th report prepared by Robert Powell for the New Jersey League of Municipalities discusses these demographic trends in more depth, and includes a detailed discussion of market considerations that impact the realistic production of affordable housing through the inclusionary zoning mechanism.

¹ Available online at: (<http://bloustein.rutgers.edu/new-rutgers-regional-report-compares-population-shifts-following-major-economic-changes/>)

It is also possible to use detailed data from the U.S. Census Bureau on rental costs and household incomes to determine the number of apartment units affordable to households at various income levels over time. ESI has undertaken such an analysis using Public Use Micro Sample (PUMS) data from the 2000 Census and the One-Year 2014 American Community Survey. The results of this analysis are presented in the table below, which demonstrates that there has in fact been a significant increase in the number of apartment units affordable to a household at the LMI threshold over the “gap” time period. In total, the number of apartments affordable to a household at the LMI income limit increased by approximately 90,000 units during the gap period.² This increase is reflective of a combination of factors including new construction, filtered units, affordability policies (such as rent controls), changes in household income, etc.

STATEWIDE APARTMENT UNITS AFFORDABLE TO AN LMI HOUSEHOLD, 2000-2014

Household Size	2000	2014	Increase
1	178,400	153,310	(25,100)
2	693,280	746,100	52,810
3	61,770	86,210	24,440
4	26,570	65,720	39,150
Total Affordable	960,030	1,051,330	91,300

[ESI analysis of Census 2000 and American Community Survey 2014 One-Year Public Use Microsample data]

RESPONSES REGARDING THE GAP PERIOD

Since the release of the Regional Master’s report, FSHC, NJBA, and their respective experts, Dr. Kinsey and Art Bernard, have offered multiple responses, including the submission by Dr. Kinsey of two calculations of affordable housing “need” arising from the gap period. None of the arguments offered in these submissions are responsive to the core points and calculation challenges identified by the Regional Master. Instead, those submissions seek to justify the use of retrospective data, seek to obfuscate or simply ignore the clear double counting in retrospective “need” and Present Need, and most prominently, seek to shift the conversation from the Legislature’s requirement to determine the Present Need and Prospective Need to the question of whether we should seek to increase the present and prospective need based upon an increase in the number of cost-burdened lower income households that came into existence in the 16 year period prior to July 1, 2015. Each of these issues is addressed in turn below.

² These calculations are based on ESI analysis of rental costs and household income as reported in the PUMS data from the 2000 Census and 2014 One-Year American Community Survey. Affordability is defined as 28% of household income, and LMI thresholds are set using Census and ACS data on 80% of median income by region by household size (as detailed in Section 4.4.1 of ESI’s methodology report). Household size categories are exclusive, meaning that rental units are counted at the lowest income group (in practice, the smallest household size) for which they are affordable at the LMI limit. Full detail on this calculation is provided as an electronic appendix to this report.

Inappropriate Use of Retrospective Data

Various parties have suggested that the time between the end of Round 1 and the release of the adopted Round 2 housing obligations for 1993 – 1999 in June of 1994 constitutes a “gap period” analogous to the current situation within the prior round methodology. This argument is outlined in Art Bernard’s January 2016 response to the Special Master’s report as follows:

The record also shows... that computing a housing obligation for a gap period is consistent with the second round methodology. The record shows that there was a short gap period between the 1987-1993 need calculations...and the effective date of N.J.A.C. 5:93-1 et. seq, June 6, 1994

[January 2016 Bernard Response to Master’s Report, p. 5]

This line of reasoning fails to recognize that no data reflecting population or housing conditions for 1994 was yet available as of the release of Round 2 calculations in June 1994, nor of course when the methodology was originally calculated and released for comment in December 1993. Therefore, from a data standpoint, there was no “gap” between Round 1 and Round 2. Said another way, the calculation of Prospective Need conducted in Round 2 did not require setting aside currently known population and housing conditions, and instead substituting conditions from some prior period. Instead, the calculation relied on the most up to date data available at the time, which was current through at latest 1993 (and in many cases relied on the 1990 Census). The attempted analogy to the 1993-1994 “gap” therefore fails due not only to a distinction in the magnitude of the gap, but a distinction in kind.

It has also been argued that the recalculation of Round 1 Prospective Need (1987-1993) undertaken in the Round 2 methodology in 1994 is analogous to the proposed calculation of need emerging from the gap period. Indeed, Dr. Kinsey’s alternative model submitted on January 22 cites this calculation as the basis for his methodological approach, which is essentially to calculate the period in an identical manner to a Prospective Need period.

This comparison makes a logical leap from an update of a prior projection with known results to the generation of an entirely new quantification of “need.” In 1994, COAH faced a situation in which it had legally assigned obligations to municipalities for the 1987 – 1993 Prospective Need period, only to discover that population growth during those years was in fact approximately half of the level that had been projected. The function of this recalculation of First Round obligations was thus not to determine the residual need associated with that growth as of 1993, but to adjust obligations that had already been assigned to a level commensurate with the latest available data on actual population growth during the Round 1 period. Put another way, the Second Round recalculation was the *elimination* of an obligation when it exceeded the need. Dr. Kinsey’s calculation is an attempt to *impose* an obligation where there is no need, which is the opposite situation.

In the current case, there is no need from the gap period, nor are there legally assigned obligations to be adjusted. The comparison of a technical change undertaken to reflect updated data to a newly created assignment of retrospective obligations based on an aggregation of past “need” irrespective of current conditions is unwarranted.

This comparison also fails to recognize the distinction between affordable housing need, as defined in the Fair Housing Act, and affordable housing obligations assigned to municipalities. The appropriate use of the Prospective Need methodology is to quantify the anticipated need for affordable housing over a defined period in the future. This need is then translated into municipal obligations related to fulfilling that need in the future. As the ESI methodology report recognizes, once these obligations are legally assigned, COAH could choose to maintain them as part of a compliance framework, regardless of the relationship of those obligations with currently identifiable need:

The core reason for this divergence (between need and obligation), and the primary challenge in reconciling the identifiable need into assigned obligations, is the need to create a system that provides compliance incentives for municipalities. While unfulfilled obligations from prior cycles do not represent additional identifiable need, ignoring them entirely would discourage municipalities from complying with legally assigned obligations.

[ESI December 30 report, p. 86]

In 1994, COAH chose to undertake a technical adjustment to those Round 1 obligations, which were still in effect, based on the most up to date data available. In 2008, by contrast, COAH chose to maintain Prior Round obligations as calculated in 1994 as part of its Round 3 methodology, rather than adjusting them with updated data. COAH's stated reason for doing so was to provide municipalities with predictability with respect to their obligations, a rationale that clearly contemplates compliance issues rather than any statistical determination of residual need. The Appellate Court in 2010 specifically found that COAH's rationale constituted a reasonable basis, and Mt. Laurel IV approves the imposition of those very same obligations without recalculation as an appropriate determination with respect to Prior Round obligations from 1987-1999:

...our decision today does not eradicate the prior round obligations; municipalities are expected to fulfill those obligations. As such, prior unfulfilled housing obligations should be the starting point for a determination of a municipality's fair share responsibility. Cf. In re Adoption of N.J.A.C. 5:96 & 5:97, supra, 416 N.J. Super. at 498-500 (approving, as starting point, imposition of "the same prior round obligations [COAH] had established as the second round obligations in 1993").

[221 N.J. 1 at 42]]

The Supreme Court's requirement to address the Prior Round obligations that COAH legally established recognizes that these carryover responsibilities represent obligations to be fulfilled due to their legal force rather than any accurate quantification of currently identifiable housing need. While the Supreme Court imposed an obligation for the second round obligations COAH assigned, it imposed no such obligations for the gap period.

Further, no methodology exists for the determination of residual need emerging from this period, including the technical correction undertaken to Round 1 obligations in 1994. FSHC and Dr. Kinsey do not in fact advance such a methodology. Rather than seeking to quantify need associated with the gap period that actually exists in New Jersey as of today, they have instead undertaken a calculation of theoretical obligations yielded by a Prospective Need-style calculation applicable only for incremental LMI households that are not housed. They thereby propose to assign an affordable housing obligation

that exceeds the actual need for affordable housing as defined in the FHA. Further, they do so in the absence of the compliance rationale that COAH and the courts have rightly applied to ensure that legally assigned obligations are not "eradicated." Instead, they generate new obligations, which have never been legally assigned, based on a methodological approach conceptually suited to be applied forward rather than backwards, and divorced from the reality of current housing need as identified in the FHA.

Overlap with Present Need

As noted above, Present Need represents the current housing conditions of LMI households, with those estimated to be living in deficient housing quantified as the Present Need. The ESI calculation of Present Need conducts this estimate as of July 1, 2015, matching the start of the Prospective Need period. As a result, any LMI households added during the gap period that live in deficient housing as of the end of the gap period (June 30, 2015) will be captured within the Present Need calculation, and do not represent any additive need. Their inclusion as a part of a gap period "need" would therefore be double-counting of the same household.

However, in its responses to the Regional Master's Report, NJBA and its experts attempt to obscure this straightforward concept. Stephen Eisdorfer of Hill Wallack LLP writes on behalf of the NJBA that:

...present need, unlike prospective need, is a measure of the characteristics of the housing stock – not a count of needy households. It is remedied by rehabilitating existing substandard housing....Because present need and prospective need, whether arising in years past or in years future, address different problems and require different solutions, COAH has not found any substantial overlap between the two and never found it to be a form of double counting.

[January 2016 Supplemental Trial Brief, p. 18-19]

First, the calculation of Present Need is not based solely on the characteristics of the housing stock. After the initial identification of deficient housing units, only the portion of those units estimated to be occupied by an LMI household are counted in the Present Need. Said another way, there is no Present Need that does not represent an LMI household. The notion that a LMI household formed in the recent past and living in deficient housing would not be captured in a retrospective "need" calculation based on its LMI status and a Present Need calculation based on the combination of its income status and housing status defies logic. Present Need captures the number of LMI households currently living in deficient housing, and quite clearly some of those households would also be captured in the incremental LMI household growth calculation from the prior period.

Secondly, the statements that Present Need "is remedied by rehabilitating existing substandard housing" and that Present Need and Prospective Need "require different solutions" is incomplete and misleading. As discussed in footnote 81 on page 80 of the December 30th ESI report, the majority of Present Need is attributable not to inadequate kitchen or inadequate plumbing facilities, but rather to housing that is overcrowded and old, a circumstance that is not easily addressed through rehabilitation. This same point was raised in FSHC's August 2014 comments on COAH's un-adopted Round 3 rules:

...overcrowding is the most significant factor contributing to (present need)...the housing improvements typically funded by a local housing rehabilitation program to address (present need), such as weatherization, do not remedy overcrowding. Rather, overcrowding is remedied by creating additional new affordable units”

[FSHC August 2014 Comments on COAH’s Proposed Round 3 Rules, Comment 32, page 13]

COAH has never prohibited a municipality from satisfying its indigenous need (the prior term for present need) with new affordable units.

Present Need is therefore clearly a compatible and additive component of the municipal summary obligation, and the same LMI households should not simply be assigned to multiple categories which are then summed. Interestingly, Dr. Kinsey and FSHC decline to sum the housing obligations in the various categories calculated in their report, and consistently present a comparison between the Kinsey and ESI methodology only in terms of the magnitude of Prospective Need, not summary obligations, which yield a far less significant percentage difference.

Similarly, Dr. Kinsey's approach to the overlap with Present Need in his gap calculation (and indeed his original model, which creates a 26 year Prospective Need period with a Present Need calculation situated in year 11) appears to be simply to ignore it. On pages 16-17 of his January 22 submission on the gap calculation, Dr. Kinsey names LMI households in a variety of categories (children, young adults, families, etc.) emerging during the gap period, and claims that all are appropriately included in his model. Notably, nowhere does Dr. Kinsey address the current housing circumstances of any of these households. Doing so would no doubt yield the inevitable conclusion that those households either currently live in deficient housing, and thus are already captured in the Present Need, or currently live in adequate housing, and therefore do not represent a current housing need under the FHA framework.

Cost-Burdened Households

FSHC, NJBA and their respective experts discuss at length the fact that many New Jersey households are cost-burdened. The increase in cost-burdened households over the gap period is presented as evidence for the existence of unaddressed gap period need, which is in turn used to justify a Prospective Need-style quantification of all incremental LMI households emerging during the gap period as representative of the additive need. This interpretation lacks not only precedent in the treatment of cost-burdened households throughout the history of fair share calculations, but also lacks the establishment of a direct causal relationship with COAH's administrative failures or a means of quantification in a non-speculative manner.

Cost-Burden: Precedent

First, precedent starting with *AMG Realty Co vs. Warren Twp*, continuing through each round (and proposed round) of COAH methodology, and affirmed in *Mt. Laurel IV* is unambiguous that cost-burdened households do not fall within the Present Need, and have never been a factor in the quantification of the Prospective Need. The Supreme Court in *Mt. Laurel IV* addresses the subject of cost-burden as follows:

Five, in addressing the first iteration of the Third Round Rules, the Appellate Division also approved the “exclu[sion of] the cost burdened-poor from the present need or rehabilitation share calculation. In so, the appellate panel noted that pre-FHA courts had also allowed exclusion of the “cost-burdened poor” from the fair share formula. The court found that COAH’s decision to exclude the cost-burdened poor was a permissible exercise of discretion.

[221 N.J. 1 at 45]]

NJBA expert Art Bernard initially sought to obscure the clear precedent as it relates to cost-burden, reasoning in his early January response to the Regional Master’s report:

Econsult has argued that the Supreme Court has ruled that cost-burdened households are not required to be included in the housing obligation. However, the Supreme Court decision (AMG Realty) relates to present need, not prospective need.

[Bernard Response to Dec. 29 Master’s report, p. 10]

Mr. Bernard’s latest report, however, allows that:

...the prior round methodologies do not include any households in the need because they are cost-burdened.

[Bernard Jan 29 Response to ESI methodology report, p. 12]

We agree with this statement, and accordingly are puzzled by the attempts at FSHC and NJBA to introduce this factor into the housing need calculation.

It is worth quoting the AMG opinion at length on the subject of cost-burden, because it provides a variety of bases for the exclusion of cost-burden as a factor in fair share calculations, each of which remain as relevant today as when they were written:

In the first instance, it must be recognized that many people do not fully report their income. Second, there are many people who by choice are willing to pay a disproportionate amount of their income for housing. Third, there is a considerable housing “mismatch.” On the one hand, some rental units which meet the affordability standards are occupied by families not in a lower income category. On the other hand, lower income families are occupying units which they cannot afford. If the families and units could be matched up, more affordable units, particularly for moderate income households, could be occupied by needy families. Fourth, it must be recognized that many people of retirement age have developed substantial assets which allows them to acquire homes. However, based upon their reported income, they could nonetheless fall into the category of financial need at least within the Mount Laurel II definition. Fifth, some argue that the needs of lower income households can be met more appropriately through income maintenance programs or other extended rent supplement programs rather than the construction of new housing. Sixth, many families in financial need are occupying substandard units thereby creating a duplication in the count of present need. For all of these reasons, it is most difficult to develop a trustworthy count of financial need which should be satisfied through Mount Laurel solutions.

In summary, notwithstanding that there is some unmet need, the untrustworthiness of the data and the desire to avoid questionable assumptions compels me to not incorporate this category.

[AMG Realty Co vs. Warren Twp at 423, emphasis added]

Taken together, the variety of reasons set forth in AMG decision illustrate why the incorporation of cost-burden into the fair share methodology is both unreliable from a calculation standpoint (instances 1, 3, and 6 above) and undesirable from a conceptual standpoint (instances 2, 4 and 5 above). Some additional discussion of these factors is warranted.

Cost-Burden: Calculation Problems

Judge Serpentelli offers several reasons that the cost-burden calculation is methodologically problematic within the fair share calculation, including misreported income, duplication with the Present Need, and what he terms the "housing mismatch." The issue of duplication with the Present Need has been addressed at length in this report and does not require additional comment, other than to note that the *AMG Realty* decision clearly recognizes that duplicative counting involving households already captured in Present Need is indeed possible and should be avoided.

Data offered by NJBA expert Art Bernard in his December 2015 submission on the gap period is instructive to illustrate the concept of "housing mismatch." That submission includes the following table on the proportion of households in various income bands that Mr. Bernard believes to be cost-burdened in 1992 and 2011:³

Income (% of Median)	Percentage of Cost Burdened Households	
	1992	2011
<30% ³		80.1
>30 and <50%	68.0	83.2
>50 and <80%	30.0	61.7
>80 up to 100% ⁴	14.2	46.0

[December 2015 Bernard *Response to Nov 18 Case Management Order Regarding Period*, p. 4]

Two clear points emerge from this statistical comparison. First, **not all LMI households are cost-burdened, and not all cost-burdened households are LMI.** According to Bernard's calculations, 80 percent of households in the lowest income band are cost-burdened, 83 percent in the ">30 and <50%" of median income band are cost-burdened, and 62 percent of households in the moderate income band ">50 and <80%" are cost-burdened. Thus, many but not all LMI households are cost-burdened. Further,

³ Note that we have not verified the accuracy of this information, as we do not consider it material to the calculation, but present it only as information submitted by Mr. Bernard. The source cited by Mr. Bernard is the State Comprehensive Housing Affordability Strategy for 1992 and "similar data" for 2011.

the data shows that 46 percent of households in the ">80 up to 100%" of median income band, which do not qualify as LMI, are cost-burdened (by inference, it is likely that some households above the median income are cost-burdened as well). This is important from a calculation standpoint because it indicates that cost-burden and LMI are not interchangeable – a given household that is in one category is not by definition in their other. Instead, as described in *AMG Realty*, there is a considerable "mismatch." From the standpoint of incremental LMI households emerging during the gap period, the overlap with cost-burden is indeterminate.

Second, and importantly to the issue at hand of the gap period, the chart shows that **the rate of cost-burden has increased far more rapidly for those households that are not LMI than for LMI households.** According to Bernard's calculations, the cost-burden proportion among households in the ">80 up to 100%" of median income band, who do not qualify as LMI, more than tripled between 1992 and 2011. Thus, while NJBA presents these data as evidence that COAH's administrative failures are responsible for these conditions (Bernard writes on the following page: "the census data illustrates the impact of New Jersey's failure to address the cumulative obligation") the data in fact show that the incidence of cost-burden has risen most rapidly for non-LMI households who are outside of the purview of COAH and the fair share framework.⁴ Clearly, therefore, the cost-burdened status of New Jersey's households are not solely tied to the effectiveness or ineffectiveness of the COAH process. Indeed, broader economic forces (such as the Great Recession that occurred during this period) are likely far more consequential. The attempt to attribute increases in cost-burden among LMI households to COAH's administrative failings is without basis in Bernard's own data.

From an empirical standpoint, the questions of causality and attribution are impossible to disentangle. We simply cannot rewind the clock and establish exactly how many households would be in a different condition had COAH proceeded differently. We do know, based on information presented by NJBA's expert, that not all LMI households are cost-burdened and that not all cost-burdened households are LMI, and that the rate of cost-burden among non-LMI households appears to be growing faster than the rate of cost-burden among LMI households. As concluded by the Regional Master's report, this "residual need" appears to "defy empirical calculation" (15).

Dr. Kinsey's proposed approach fails to recognize these facts. He simply states as fact a causal connection between COAH's administrative failings and the increase in cost-burdened households that has not been demonstrated:

The sharp increases in cost-burdened LMI HH are evidence of the repeated failures of COAH to adopt and enforce constitutional housing obligations.

[Kinsey January 6 Supplemental Report on Gap Period Need, p. 9]

His gap methodology is thus built on the premise that incremental LMI households emerging during the gap period that are currently living in sound housing but are cost-burdened represent current "need"

⁴ It should of course also be noted that the time period chosen covers seven years of the prior round, and that affordable housing has continued to be produced since 1999, furthering undermining the connection between the data presented and COAH's administrative failings.

because their housing condition is the result of the administrative failings of COAH. What portion of the incremental LMI households emerging from the gap period does Dr. Kinsey estimate to comprise this category? Apparently all of them, as every incremental LMI household from 1999-2015 is included as “need” in his retrospective calculation based on a Prospective Need methodology (under each of his approaches).⁵

As reviewed above, this claim is unsupported by the evidence presented. Thus, not only have FSHC, NJBA and their respective experts failed to reckon with the precedents, which clearly and rightly exclude cost-burden from consideration in the calculation, they have failed to demonstrate or offer any credible calculation on the degree to which COAH’s administrative failures during the gap period have caused the current cost-burden circumstances of LMI households emerging during the gap period, as discussed in the “Dynamic Nature of the Housing Market” section.

Cost-Burden: Conceptual Problems

Next, we turn to the reasons identified by Judge Serpentelli that cost-burden is conceptually problematic as a part of the fair share calculation.

First, some people choose willingly to pay a larger percentage of their income than standards say they “should” pay based on the value they place on housing as an amenity. This can be a matter of personal choice, and not a public policy issue, as people value goods, such as housing, differently from one another. It therefore does not imply that these people (LMI or not) are “in need” of housing. Further, the standards set forth by NJBA and FSHC to determine “cost-burden” do not account for all costs associated with housing decisions. Most notable among these is transportation costs. It may be rational and indeed less expensive for a person choosing between two housing options to pay a higher proportion of their income in order to live close to their place of employment or close to public transit in order to save on transportation spending. Again, this is not indicative of housing “need” requiring intervention.

Second, Judge Serpentelli rightly notes some households that appear in the cost-burden calculation may be retirees that have substantial housing assets already accumulated, and are not in need of housing. The clear implication is that the methodology should not encourage the construction of homes for households that do not need them. This is the conceptual basis for the significant housing asset test, which is incorporated into ESI’s broader methodology based on Uniform Housing Affordability Controls (UHAC) eligibility standards (to which FSHC and NJBA have objected).

Finally, and most fundamentally, Judge Serpentelli rightly observes that the needs of cost-burdened lower income households may be “met more appropriately” remedies other than the construction of new housing. This distinction goes to the heart of the conceptual problem with attributing a housing need to LMI households from a prior period who currently live in sound units. Above and beyond the fact that there is no legal basis in the FHA to attribute a need to these households, there are coherent policy

⁵ In fact, his answer for Ocean County is “more than all of them,” since, as reviewed below, Dr. Kinsey’s mistreatment of secondary sources contributes to a calculation of Countywide “need” in his alternative model (9,778) that far exceeds the incremental LMI household growth that he identifies in the model (8,061).

reasons for not mandating such an additional housing obligation on top of the Present Need and Prospective Need. Constructing additional housing for people who *already have* adequate housing would be a waste of society's scarce resources. Further, the mandated additional housing would impact the private market, driving many existing housing units to vacancy and demolition. As the ESI methodology report notes "while these households have an *income* need, they do not have a *housing* need, and thus any remedy is outside of the fair share affordable housing framework" (89). The *AMG Realty* decision recognizes this very point explicitly in its exclusion of the cost-burdened from the quantification of the need.

Cost-Burden: Summary

In summary, the increase in cost-burden households in New Jersey represents the primary argument put forward by FSHC, NJBA and its respective experts as to how incremental LMI households emerging during the gap period and living in sound housing represent a currently identifiable, additive affordable housing need. As detailed above, this concept is without basis in precedent, unquantifiable (in particular as it relates to its relationship with COAH's administrative failings), and has been previously considered and rejected for sound reasons as a basis for fair share need.

By all accounts, cost-burden has never been a consideration in the fair share methodology, let alone as a factor to justify a retrospective calculation based on a Prospective Need methodology. Yet, the parties who have heretofore argued that the Prior Round methodology is unassailable and must be followed as exactly as possible are now advancing the cost-burden as a relevant factor, despite its exclusion from Prior Rounds. Indeed, the standard suggested appears to be that cost-burden is a relevant consideration for those incremental LMI households emerging between 1999 and 2015, but for no other households before or after that time, even though those households are indistinguishable with regard to their current housing circumstances.

Further, as established in *AMG Realty*, cost-burden defies appropriate quantification within the fair share methodology, and in any event its inclusion is conceptually problematic. These challenges apply additionally to the attempt to demonstrate and quantify causality between COAH's administrative failures during the gap period and the increase in cost-burden households during that time. As demonstrated by data from NJBA's expert, not all LMI households are cost-burdened, and not all cost-burden households are LMI. In fact, the data demonstrates that the increase in cost-burdened households has been most pronounced for those households that do not qualify as LMI, undermining the proposed direct linkage between COAH's failures and the rise of cost-burdened households. Rather than wrestling with this attribution challenge, Dr. Kinsey instead proposes that all incremental LMI households represent current housing need, due to the general existence of cost-burden. This position is demonstrably incoherent based on the evidence above, and non-responsive to the empirical issue in question.

Finally, as established in *AMG Realty*, there are a number of reasons why even to the extent that cost-burden is quantifiable, it should not serve as a consideration in the fair share methodology. Households may choose rather than be "forced" to spend more than a set percentage of income on housing, and may be completely rational in doing so, whether because they value housing over other amenities, because their housing option allows them to save on transportation costs, or for some other reason.

Some households may be retirees who qualify as cost-burden based on their current income but have accumulated significant real estate assets. None of these cases represent a housing need requiring a policy intervention. More generally and more fundamentally, those LMI households living in sound housing units have an income problem rather than a housing problem. Including this broad category of households in the need is certainly not a policy that has been advanced or required as part of any fair share methodology.

DR. KINSEY'S ALTERNATIVE CALCULATION OF THE GAP PERIOD (1999-2015)

Dr. Kinsey's submission on January 22nd sets forth two calculations attempting to quantify affordable housing need emerging from the gap period. As noted above, neither is responsive to the legal or empirical impediments to this task. Nonetheless, a review of these submissions is instructive for what it reveals about Dr. Kinsey's original model (1999 – 2025), which he and FSHC continue to maintain in their letter accompanying the January 22nd submission "best calculates Third Round obligations" (1). This section discusses the two "gap" models submitted by Dr. Kinsey and the distinction between the two, as well as the conceptual and analytical flaws they contain. The section that follows discusses the implications of the alternative calculation of the gap period submitted by Dr. Kinsey for the results of his original model.

The first calculation submitted by Dr. Kinsey for "need" arising from the gap period simply truncates the calculations of the 1999 – 2025 Kinsey model to the 1999 – 2015 period. Dr. Kinsey notes that this approach incorporates "actual data for 13/14 years" (14), since the basis for the calculations of 2015 are generally data points from 2012 or 2013. In this respect, the approach should by definition provide a more accurate picture of population and household change than the full model, which uses these same data points to extrapolate out to 2025 (rather than 2015). Interestingly, as noted by Dr. Kinsey on page 12, the incremental LMI household growth projected by the model for 1999 – 2015 of 146,000 constitutes 51% of the 285,000 total incremental LMI household growth projected by the Kinsey model over the 26 year period, despite the fact that the time period covered represents 62% of the 26 year period. This indicates that the Kinsey model projects future LMI household growth to be significantly faster than observed trends from recent years, a point which we will return to below.

Ultimately, however, this model makes no serious attempt to accurately quantify need emerging from the gap period. Not only is it non-responsive to the legal and empirical challenges of quantifying how incremental LMI household growth relates to housing conditions today in the quantification of need, but it fails even to update its data inputs or assumptions with currently known information, instead simply truncating the flawed Prospective Need model offered by Dr. Kinsey for the 1999 – 2025 model at an earlier date.

Dr. Kinsey's submission also presented an alternate calculation (referred to in his Summary as "Alternative #2" and herein as the "alternative model") of affordable housing "need" from the gap period. Dr. Kinsey's submission "Summary" describes this calculation as "based on changes in households, headships rates and housing market conditions that actually took place during 1999 – 2015" (2). As previously noted, this alternative model shares the central flaws of Dr. Kinsey's attempt to define a gap obligation by truncating his original model. Fundamentally, it applies a Prospective Need framework

retrospectively, and in so doing ignores the current housing circumstances of LMI households emerging during the gap period, instead incorrectly attributing them all as representative of a current “need.”

FHSC and Dr. Kinsey have presented no evidence on how many additional units, if any, would have been built in that time period had rules similar to the Prior Round Rules been in effect since 1999. Nor do they present evidence on how many fewer private sector units might have been built between 1999 and 2015, if any, because of financial burdens caused by fair share requirements. Nor do they present evidence on whether additional private sector market units would have been displaced from the housing stock by newly constructed deed-restricted affordable housing units. Any calculation of what “would have happened” would have to consider these and other quantities. Put another way, FSHC is contending that COAH’s inaction caused more than 100,000 LMI households to be harmed. That contention is not supported by any evidence they have put forward. It implicitly assumes, incorrectly, that all units “obligated” would have been built, and that the housing market would have otherwise unfolded the same way.

The alternative methodology also makes an unwarranted reduction in estimates of filtering. On page 8, Dr. Kinsey quotes COAH’s explanation of how these secondary sources were “scaled down accordingly by the ratio of lower new-period (1993-1999) to higher old period (1987-1993) secondary source incidence rates” in the recalculation of Round 1 undertaken by COAH in 1994. Dr. Kinsey therefore calculates the ratio by which COAH’s 1999 – 2018 methodology over-projected household growth for the 1999 – 2015 and reduces the filtering estimates by this proportion (0.71). Unfortunately, no population projection factor is included in the Econsult model of filtering, which estimates the likelihood of filtering of the current housing stock as of the time of the calculation. Thus, the approach employed is not only inappropriate, but is not successfully executed with respect to filtering.

Dr. Kinsey’s alternative method does, however, seek to incorporate updated information from that included in his original model. Dr. Kinsey describes the calculation on page 19 as based on “actual, observed growth.” As such, Dr. Kinsey represents these calculations as his best and most current estimates of the current population and household characteristics in New Jersey as of 2015. The result of these calculations is an estimate of 109,000 incremental LMI households between 1999 and 2015. This increment is significantly lower than the 146,000 estimated under the truncated Kinsey model, a difference of 37,000 (or 25%).

The key driver of this differential, as Dr. Kinsey rightly identifies, is a change in the calculation of the proportion of the New Jersey population estimated to be LMI. The treatment of this specific calculation in the original Kinsey model has been the subject of considerable debate up to this point. As discussed at length in ESI’s methodology report and in ESI’s September 24th “Review and Analysis” report for the New Jersey State League of Municipalities, the Kinsey model utilizes a faulty standard to define the median income and then fails to follow the statistical properties of the median in his future projections. These errors result in an estimate that the LMI proportion of the population will grow from 41.2% in 1999 to 43.3% in 2013 to 45.0% in 2025, which in turn results in the classification of 77% of incremental households during this period as LMI. By way of context, this increasing rate alone accounts for approximately half of the incremental LMI household growth of 285,000 for the 26 year period estimated in the Kinsey model.

The Regional Master's October 30 review of the Kinsey methodology described this as a "very significant methodological issue" that "requires an adjustment to the foundation of Dr. Kinsey's prospective need estimate" (12). This common sense assessment would perhaps be shared by the authors of Fair Share Housing Center's August 2014 comments on COAH's proposed methodology, who opined as follows regarding COAH's determination of the LMI ratio:

COAH determined that low and moderate income households represent 40.622% of all households in New Jersey....this is intuitively correct, as the income definitions for these is those with incomes less than 80% of the median, i.e. 40% of the total, and reasonable. No change is recommended.

[FSHC Comments on N.J.A.C 5:98 and 5:99, August 1, 2014, Comment 58, p. 20]

This assessment is apparently not shared by Dr. Kinsey, who has not adjusted his original model and its treatment of this issue, and accordingly estimates in his January 22nd gap period submission that the appropriate LMI ratio for 2015 using his truncated 1999 – 2015 model is 43.5%. However, Dr. Kinsey's alternative model includes an updated calculation of this crucial component, due to the fact that "HUD in 2015 changed its methodology for calculating income limits" (26). This technical adjustment has significant implications for the LMI ratio calculated by Dr. Kinsey.⁶ Dr. Kinsey details those implications as follows:

It so happens that when this calculation is made, it results in a significantly lower share of LMI households as of 2015 than the share of LMI households calculated in the July 2015 Model based on 2013 data. Statewide, the ACS data as adjusted for 2015 income limits shows 41.3 percent of households are LMI, as compared to 43.3 percent for ACS data. This 41.3 percent figure happens to be almost exactly the same as the 41.2 percent of households that were LMI as of the 2000 Census long-form data. Thus, LMI households remain a relatively constant share of total households in this alternative gap period model based on this new methodology, which is the primary reason that the prior cycle prospective need methodology produces lower 1999-2015 prospective need than the July model.

[Kinsey Gap Period Submission, p. 28]

This discovery is, to put it mildly, not a small matter in the context of the Kinsey model (setting aside ESI's objection to the use of this flawed metric in the first place). As previously referenced, the upward shift in the LMI rate in Dr. Kinsey's model to 45% is responsible *by itself* for approximately half of the Prospective Need estimated by Dr. Kinsey over the 26 year period. In the course of the extended discussion of this issue in reports produced by ESI, Dr. Kinsey, and the Special Master concerning this methodology, Dr. Kinsey has offered multiple defenses of this bizarre result, most notably asserting that it presented a "hollowing out of the middle" that in his telling rendered any typical distribution of income

⁶ Dr. Kinsey explains on page 27 of his January 22nd gap period submission that this adjustment relates to the inflation and growth factors utilized by HUD to estimate the median income.

around the median in New Jersey obsolete.⁷ Dr. Kinsey now reports in the context of his January 22nd gap model that the significant increase in the LMI proportion from 41.2% in 1999 to 43.3% in 2013 in his original model, from which he extrapolates to the still higher LMI proportion of 45.0% in 2025 (albeit incorrectly due to the statistical properties of the median, as ESI has explained a length) **has now been effectively eliminated based on a correction issued by HUD.**

Dr. Kinsey does not dispute this HUD correction or its accuracy. Indeed, he incorporates it into his alternative gap model, which has as its basis "changes in households, headships rates and housing market conditions that actually took place during 1999 – 2015" (2). Astonishingly, however, in the face of this new information, Dr. Kinsey and FSHC maintain in their January 22nd submission the original Kinsey model, **unadjusted to correct for this change to a highly consequential input identified by Dr. Kinsey himself, "best calculates Third Round obligations."** Further, and equally astonishingly, a week after including this new information in his submission to the Court, Dr. Kinsey's January 29th submission writes as follows with respect to ESI's calculation of the LMI proportion:

The impact of Econsult's misbegotten 40% of median absolutist approach to defining LMI HH on housing need is no doubt very significant. The Kinsey-FSHC R3 Model July 2015 found that 41.2% of New Jersey's 3.0 million households as of 1999 were LMI based on 2000 Census PUMS data, and projected that 45.0% of New Jersey's projected 3.4 million HH in 2025 would qualify as LMI based on 2013 ACS PUMS data, in both cases, using the HUD-based, COAH-calculated regional income limits required by the Prior Round methodology. The difference between the change in households calculated by FSHC based on actual data from the 2000 Census PUMS and the 2013 ACS PUMS in the Kinsey-FSHC R3 Model July 2015 and the applying the 40.0% of HH standard championed by Econsult is approximately 136,417 LMI HH over the 1999-2025 projection period.

[January 29 response to Econsult Report, p. 22]

Thus, in the face of his own evidence that the LMI proportion in the Kinsey model is seriously flawed (as has been maintained by ESI and the Special Master throughout), Dr. Kinsey offers not a correction but a re-affirmation that his model has accurately quantified incremental LMI HH growth and thus affordable housing need.

Given this claim, we turn to the statistical implications of Dr. Kinsey and FSHC's simultaneous contention that the original Kinsey model "best calculates Third Round obligations," and thus population and household conditions as of 2025, and that the alternative Kinsey model represents Dr. Kinsey's best estimate of what "actually took place during 1999 – 2015," and thus population and household conditions as of today.

⁷ In his October 28 *Response to Special Regional Master's Inquiry on Qualifying Low and Moderate Income Households in the Fair Share Methodology*, Dr. Kinsey writes:

There is a well-known phenomenon of "the hollowing out of the middle" and increased income polarization may explain some of the increase in the LMI share of total HHs.... there is no reason to think that household incomes necessarily follow a distribution such that 40% of all households are below 80% of median household income. In an area in which there are fewer middle-class jobs and more households at the extremes, it is not surprising to see in the Census data a reflection of this trend. While Econsult proposes various ways to ignore this reality, it is simply what the data reflect that is experienced by families and people with disabilities throughout New Jersey.

IMPLICATIONS OF THE DR. KINSEY'S ALTERNATIVE MODEL FOR THE PROSPECTIVE NEED PERIOD (2015-2025)

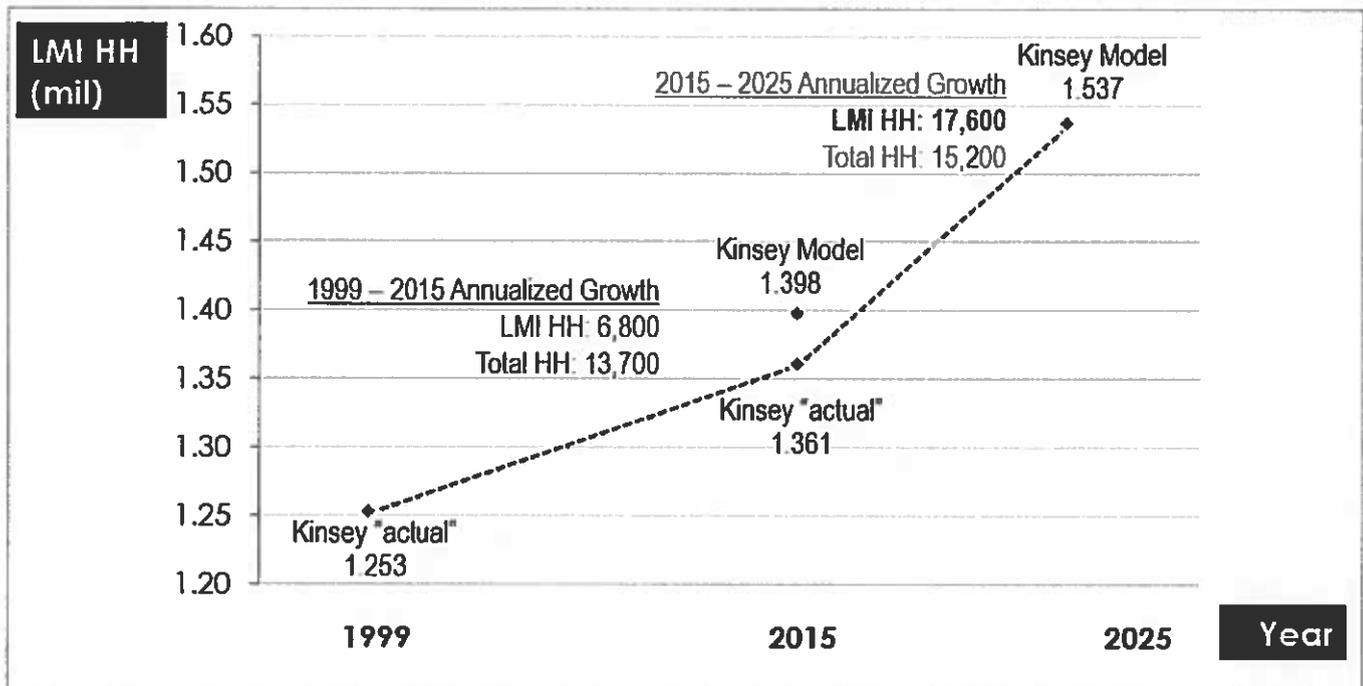
As previously described, ESI maintains that the gap period does not generate any additive affordable housing need within the FHA framework to that calculated within Present Need and Prospective Need for the 2015-2025 period. Therefore, no calculation of this need is necessary or appropriate, and attempts to do so inevitably result in double-counting or miscounting of need (as outlined in our December 8 submission, our December 30 methodology report, and throughout this analysis). Further, as described in this report, attempts to calculate "residual need" based on cost-burdened households are without precedent or empirical basis, nor are they appropriate. We also maintain that Dr. Kinsey has not submitted such a calculation, or made any allowance for information on the current housing conditions of New Jersey's LMI households, but instead has offered two attempts to apply a Prospective Need framework to a retrospective calculation of "need."

It is nonetheless instructive to examine the results of the alternative model submitted by Dr. Kinsey for 2015 with the results of the original model submitted by Dr. Kinsey for 2025. Despite these calculations emerging from two different models, this comparison is relevant for the simple reason that Dr. Kinsey has submitted his alternative calculation as his best and most up to date estimate of current population and household conditions in 2015, and maintains that his original model provides the best and most appropriate calculations of these conditions as of 2025. For each of these claims to simultaneously be correct, the changes in the population and household conditions currently estimated by Dr. Kinsey for 2015 and those estimated by the July 2015 Kinsey model for 2025 must by definition be reasonably likely to occur of the 2015 - 2025 period. The table and figure below provides a comparison of these key metrics, as calculated by Dr. Kinsey himself, for the relevant time periods. Note that both models start from the same estimates for 1999.

COMPARISON OF POPULATION, HOUSEHOLDS AND LMI IN JULY 2015 KINSEY MODEL AND KINSEY ALTERNATIVE GAP MODEL

Year	1999	2015	2025	1999 - 2015	2015-2025
Source	July 2015 Kinsey Model & Alt. Gap Model	Kinsey Alternative Gap Model	July 2015 Kinsey Model	Annualized	Annualized
Population	8,360,000	8,958,000	9,377,000	37,400	41,900
All Households	3,043,000	3,262,000	3,415,000	13,700	15,200
LMI HH	1,253,000	1,361,000	1,537,000	6,800	17,600
LMI %	41.2%	41.7%	45.0%	49.6%	<u>116%</u>

STATEWIDE LMI HOUSEHOLD GROWTH, JULY 2015 KINSEY MODEL AND KINSEY ALTERNATIVE GAP MODEL



The original Kinsey model projects a significant uptick in annual LMI household growth within the later portion of its 26 year Prospective Need period as it moves from the period for which actual data is available to its projection period (resulting in an estimate that 49% of need will be generated in the final 10 of the 26 years). The alternative gap model representing Dr. Kinsey's best estimate of current actual conditions now yields a significantly lower calculation of LMI households in 2015 than that original Kinsey model. Dr. Kinsey and FSHC are apparently undeterred by these calculations, produced by Dr. Kinsey himself, and maintain that their 2025 projections are appropriate.

Achieving the projections for LMI household growth set forth in the Kinsey model for 2025, based on the current conditions as calculated by Dr. Kinsey for 2015, would now require an annual growth rate in LMI households nearly three times as large as that calculated by Dr. Kinsey based on observed data for the 1999 – 2015 period. More stunningly, to achieve this projection would require the creation of significantly more LMI households per year (17,600) than total households (15,200), according to Dr. Kinsey's own calculations. This means that 116% of all new households would be LMI households. In other words, the number of non-LMI households would have to *shrink* by 2,400 households per year while the number of LMI households was growing at an unprecedented pace (keeping in mind that LMI households are defined relative to the median income) to achieve this projection.

The projections of the July 2015 Kinsey model for the forthcoming Prospective Need period are therefore incompatible with the current conditions in New Jersey as calculated by Dr. Kinsey himself, due to a number of faulty and disproven assumptions and calculations, most notably a significant jump in the statewide LMI proportion. The Kinsey model, its calculations, and its projections are simply

untenable as a basis for calculating affordable housing need and assigning affordable housing obligations.

It is a well-worn military adage that “no battle plan survives first contact with the enemy.” Dr. Kinsey’s January 22nd calculations of what he characterizes as “actual, observed growth” for the 1999-2015 gap period appear provide the first contact of his theoretical model with reality, and indeed the model does not survive. Instead, it collapses under its contradictions with the current conditions as estimated by Dr. Kinsey himself.

No doubt Dr. Kinsey could generate a list of differences in assumptions and inputs between his alternative gap model and his original model, and advance a claim that their outputs somehow cannot be compared. Such a claim might work as a theoretical exercise, but would discard with it the core purpose of the model, which is (supposed to be) to accurately quantify affordable housing need. The utility of his model with respect to that question can be evaluated using some very basic questions:

- Does Dr. Kinsey’s alternate model represent his best estimates of the current number of households and LMI households in New Jersey (as of 2015)? He maintains that it does.
- Does Dr. Kinsey’s original model represent his best projection of the number of households and LMI households in New Jersey in 2025? He maintains that it does.
- Is the growth in households and LMI households required to get from those current conditions (as estimated by Dr. Kinsey) to the 2025 projections (maintained by Dr. Kinsey) plausible or reasonable? It plainly is not.

The Kinsey model results are thus fundamentally inconsistent with Dr. Kinsey’s own calculation of the current reality of New Jersey’s households and their characteristics. This basic analysis demonstrates conclusively that the Kinsey model, the flawed assumptions of which have been detailed at length, does not and cannot serve as a reliable basis for the assignment of affordable housing obligations for the Third Round.

ECONSULT SOLUTIONS, INC. GAP PERIOD CALCULATION

March 24, 2016

REPORT SUBMITTED BY:
Econsult Solutions
1435 Walnut Street
Philadelphia, PA 19102



Peter A. Angelides, Ph.D., AICP
Principal

A handwritten signature in black ink that reads "Peter A. Angelides".

TABLE OF CONTENTS

Table of Contents	2
Section 1: Introduction and Summary	3
Section 2: Gap Period Methodology and Calculation	6
Section 3: Households Identified by Gap Period Calculation	20
Section 4: Affordable Housing Production Context	26
Appendix A: Municipal Allocation of Obligations.....	36
Appendix B: Municipal Allocation Factors	40
Appendix C: Municipal Secondary Source Adjustments	54
Appendix D: Municipal Allocation Caps	68
Appendix E: Municipal Summary Allocations	82



SECTION 1: INTRODUCTION AND SUMMARY

Introduction

This submission represents ESI's response to Judge Troncone's February 18th opinion *In Re: Declaratory Judgement Actions Filed in Various Municipalities, County of Ocean, Pursuant to the Supreme Court's Decision in In Re Adoption of N.J.A.C 5:96, 221 N.J. 1 (2015)* ("February 18th Opinion"). That opinion relates to fair share affordable housing allocations emerging from the "gap period" from 1999 – 2015, relying in part on a February 17th report by Special Regional Master Richard Reading (entitled *Bridging the Gap*) and concludes its discussion of the gap issue as follows:

...his (Mr. Reading's) recommendations as to the methods and processes to be employed in developing an accurate and reliable methodology to determine the gap period need is adopted by the court and shall be utilized by the parties when preparing their suggested methodologies to the court in advance of the upcoming trial.

[February 18th Opinion, p. 21]

ESI position on the appropriateness of inclusion of the gap period in the fair share calculation has been extensively documented in several reports, including:

- ESI's December 8, 2015 expert submission to the Court in Ocean County (entitled *Econsult Solutions Inc. Response to Ocean County Third Revised Case Management Order*).
- Section 7 of ESI's methodology report (entitled *New Jersey Affordable Housing Need and Obligations*) released in December 2015 and updated in March 2016.
- ESI's February 8, 2016 expert submission to the Court in Ocean County (entitled *Econsult Solutions, Inc. Analysis of the Gap Period (1999-2015)*).

Our analysis from those reports as the appropriateness of inclusion of the gap period in fair share obligations remains unchanged. Stated simply, these submissions demonstrate that the New Jersey Fair Housing Act ("FHA"), which governs the application of fair share obligations, calls only for the calculation of Present Need and Prospective Need, which together represent the entirety of identifiable need within the fair share framework. Further, the Supreme Court's Mt. Laurel IV decision called for the use of methodologies similar to those used in Rounds 1 and 2 for a specific purpose: to address the Present and Prospective need, not to identify and attempt to quantify any other need. The Special Master's *Bridging the Gap* report is absolutely clear that the calculation adopted by the Court fits neither of these categories, and has no precedent in the Prior Round methodology:

The calculation of current needs of the affordable households formed during the sixteen year Gap Period is not a process that is imbedded in the Prior Round methodology, is not a projected (Prospective) need, but should be undertaken as a separate and discrete component of affordable housing need...



...the continuing needs of LMI households formed during the gap period are different and distinct from the measurement of deficient housing units or the projection of future LMI households. Accordingly, the Gap period would necessitate a different methodology than those used for Present and Prospective Need.

[Reading *Bridging the Gap* Report, p. 17]

Further, the fundamental difference between LMI households emerging during the gap period and those LMI households included in the 2015 Present Need or 2015 – 2025 Prospective Need is that those gap period LMI households (to the extent that they are not already included in the Present Need calculation) currently have sound housing, while the LMI households accounted for in Prospective Need and Present Need do not. Accordingly, we maintain that the gap period yields no legal affordable housing obligations nor identifiable additive affordable housing need given the FHA framework and the instructions of Mount Laurel IV.

Nonetheless, the Court's February 18th opinion and concluding order asks Special Master Reading to prepare a "separate and distinct" calculation of gap period obligations for Ocean County municipalities utilizing the methodology set forth in the Special Master's February 17th report. This report and the accompanying workbook conduct such a calculation, in accordance with the methodology set forth in the Special Master's report and adopted by the Court. As envisioned by the Special Master, the calculation utilizes actual observed data to the greatest extent possible to identify the increment of "LMI households formed but not satisfied during the gap period" (*Bridging the Gap*, p. 16).

Section 2 of this report details the methodology employed in this calculation and statewide results. Appendix A provides municipal level results for Ocean County, while the remaining appendices and the accompanying workbook provide the calculations and results for all municipalities statewide. Since the Court's February 18th opinion also provides for the application of municipal allocation caps to the sum of a municipality's Present Need, Prospective Need and Gap Allocation, the pre-cap Present Need and Prospective Need calculated in ESI's *Need and Obligations* report are necessarily incorporated into this methodology, yielding complete initial municipal obligations accounting for allocation caps. As in the *Need and Obligations* report, no estimate or determination is made of the level of adjustments, activity or credits applicable to each municipality, since no reliable, uniform statewide data set exists for this information. Therefore, each municipality would have the opportunity to demonstrate this component to the Court, thereby reducing the Initial Summary obligation, in their efforts to secure approvals of their affordable housing plans.

Sections 3 and 4 of this report consider the calculation undertaken in Section 2 within the context of total fair share obligations and the fair share process. Section 3 demonstrates that the methodology set forth by the Special Master, which excludes incremental LMI households that currently live in inadequate housing, or have their housing needs satisfied through market-generated or deed-restricted affordable housing, necessarily produces an estimate of LMI households who have sound housing but are cost-burdened. The section reviews at length the precedent and rationale for the exclusion of cost-burden as a consideration in the determination of fair share need

Finally, Section 4 discusses whether the application of gap period obligations is reasonable or practical in the context of private market conditions and the past production of affordable housing within the

COAH process. Section 4 demonstrates that the clear intent of the FHA, reflected in COAH's implementation, is to generate realistic fair share obligations that offer municipalities the opportunity for voluntarily compliance within the fair share process, and in so doing to generate affordable housing through a comprehensive planning and implementation process, rather than through the builder's remedy method. To the extent that obligations for the Present Need and Prospective Need period already match or exceed the potential for New Jersey's municipalities to meet the obligations over the next decade, adding a new category of need covering sixteen years is unlikely to generate additional affordable housing, but instead will frustrate the efforts of municipalities to comply with assigned obligations through their housing plans.

Summary

This report undertakes a calculation of municipal fair share allocations for the gap period under the methodology set forth by Special Master Reading and endorsed by the Court. Section 2 of this report, along with the appendices and accompanying workbook detail the methodology, calculations, and resulting municipal obligations.

While such a methodology is logistically and mathematically possible to execute, it is problematic in numerous respects. The calculation departs from the FHA definition of affordable housing need from which fair share obligations emerge. Further, the method by its construction yields an estimate of cost-burdened households remaining from the gap period, in clear violation of COAH's explicit decision (affirmed by court decisions up to and including Mt. Laurel IV) to exclude cost-burden from consideration as a factor in determining housing need. Finally, the inclusion of gap period allocations produce obligations far beyond what is realistically possible for municipalities to implement, undermining the statutory obligation within the FHA to produce reasonable fair share obligations that encourage, rather than frustrate, voluntary compliance by municipalities as a means to ultimately generate affordable housing production for New Jersey's LMI households.

SECTION 2: GAP PERIOD METHODOLOGY AND CALCULATION

Introduction

The methodology and calculations set forth in this section and in the appendices to this report are in response to Court's February 18th opinion and concluding order. It represents a complete methodology consistent with the approach set forth in the Court's opinion and in the Special Regional Master's February 17th *Bridging the Gap* report, yielding municipal allocations for the gap period, including the appropriate application of municipal allocation caps consistent with the Court's February 18th opinion.

It is important to reiterate that, as explained in the introduction of this report, the submission of this methodology does not supersede ESI's analysis from our *Need and Obligations* report and December 8, 2015 and February 8, 2016 expert submissions or represent an endorsement of the appropriateness of including the gap period in Round 3 fair share obligations. The calculation executes the mechanics of the methodology outlined by the Court and the Special Regional Master without endorsing its use as a basis for assigning municipal obligations.

Methodological Principles

The Court's February 18th opinion states with respect Special Regional Master Reading's February 17th report:

His recommendations as to the methods and processes to be employed in developing an accurate and reliable methodology to determine the gap period need is adopted by the court and shall be utilized by the parties when preparing their suggested methodologies to the court...

[Feb 18th Opinion, p. 21]

The Special Master's report is clear that a retrospective application of a Prospective Need methodology does not represent an appropriate quantification of the gap period. In the "Recommendations" section of that report, he defines the gap as "a separate and discrete component of affordable housing need":

The calculation of current needs of the affordable households formed during the sixteen year Gap Period is not a process that is imbedded in the Prior Round methodology, is not a projected (Prospective) need, but should be undertaken as a separate and discrete component of affordable housing need...

...the continuing needs of LMI households formed during the gap period are different and distinct from the measurement of deficient housing units or the projection of future LMI households. Accordingly, the Gap period would necessitate a different methodology than those used for Present and Prospective Need.

[Reading *Bridging the Gap* Report, p. 17]

In his review of FSHC's two gap period calculations, Special Master Reading notes that the alternative gap model, which he characterizes as a "move in the right direction" based on its use of "actual data rather than projections":

...needs to be further refined to incorporate more factual data and to include more information to accurately identify the LMI households formed, but not satisfied, during the gap period.

[Reading *Bridging the Gap* Report, p. 16 (emphasis added)]

The procedure outlined by Special Master Reading to conduct this calculation is as follows:

Wherever possible, factual data should be used in Gap Period calculations, replacing estimates and projections, and would at minimum be expected to employ the following steps:

- 1) determine the actual increase in occupied households between 1999 and 2015;
- 2) determine the number (of) LMI households in 1999 and 2015 and the increment thereof;
- 3) obtain and calculate the secondary sources of LMI housing;
- 4) adjust the Gap Period LMI households for 2015 LMI Present Need households, and;
- 5) adjust the increase in LMI households for affordable housing activity from 1999-2015

[Reading *Bridging the Gap* Report, p. 17]

The methodology and calculations outlined below follow this procedure, using current and factual data already available within the confines of the fair share calculation wherever possible rather than projections, to arrive at the most accurate estimate of "LMI households formed, but not satisfied during the gap period."¹

It must be noted that the approach outlined by the Special Master is silent on the method by which obligations should be allocated to municipalities with respect to the gap period.² While the Special Master is clear that the gap calculation is "separate and discrete" and that "the continuing needs of LMI households formed during the gap period are different and distinct," and thus is not based in the prior round methodologies, no guidance is provided by the Special Master or the Court on the conceptual

¹ Though the language of the sentence implies a calculation of all households formed in the gap, and then not satisfied, the calculation the Special Master outlines is clearly based on the net increase in LMI households in the gap period. Further, the Kinsey calculation of the gap need is also based on the net increase, or increment, in LMI households in the gap period. Accordingly, we understand the Special Master's language of "households formed but not satisfied" to mean incremental LMI households from the beginning to the end of the period.

The number of "gap" LMI HHs in this analysis is thus a net number, as the number of LMI HHs actually formed in the gap exceeds the number of incremental LMI HHs because there is continuous churn in LMI HHs. A simple example with fictitious numbers will illustrate. Suppose in 1999 there are 1,500 LMI HHs. By 2015, 600 have disappeared, through death, marriage, moving out of state, or a change in income, so that 900 are left in 2015. In the 1999-2015 gap period, 1,100 new LMI HH form, and 400 of those gap HH disappear before 2015, leaving 700 left in 2015. There are a total of 1,600 LMI HH in 2015, an increase of 100 from 1999. Thus, there is a net increase of 100 LMI HH, whereas there are 700 new LMI HH that formed in the gap that are still LMI HH in NJ in 2015.

² Since the gap analysis is retrospective, it could in principal be done on the municipal level, and no allocation would be necessary. However, the data to determine the number of incremental LMI households in each municipality from 1999-2015 are not available at the municipal level, and so the method needs to include a calculation at a more aggregated level that is then allocated to the municipalities.

basis by which municipalities should be assigned responsibility for these gap units. As explored in Section 3, regardless of the magnitude of “LMI households formed but not satisfied,” ESI does not believe an appropriate framework for the assignment of municipal obligation exists, since the identified households by definition currently live in adequate housing. In the absence of guidance from the court, statutes, or the prior round method, the allocation factors utilized in ESI’s Prospective Need model (including two “capacity” and two “responsibility” factors and the exclusion of qualifying urban aid municipalities) are utilized unadjusted for the allocation of regional gap households to municipalities within this methodology.

In addition, as reviewed in Section 7 of our *Need and Obligations* report, reliable data on past municipal affordable housing activity needed to execute Step 5 of the Special Master’s methodology does not exist on a statewide basis. As a result, we do not undertake this step, but assume that if such obligations were adopted, municipalities would have the opportunity to demonstrate the extent of their activity on a case by case basis as part of their efforts to achieve certification of their housing plans.

Methodology, Inputs and Data Sources Overview

ESI’s gap period methodology undertakes the steps outlined in Table 2.1. The mechanics and results of each calculation are detailed below.

TABLE 2.1: METHODOLOGY, DATA SOURCES AND DATA INPUTS OVERVIEW

Step	Input	Data Source	Original Data Inputs
Increase in Occupied HH	Increase in Households	Kinsey Alternative Gap Model	Census, ACS
Incremental LMI HH	LMI Rate	ESI Model ³	ACS
Eligible LMI HH Increment	Significant Asset Rate	ESI Model	ACS
Present Need Overlap	Present Need Gap Increment	ESI Model x (16/15)	Census, ACS
Municipal Allocation	Municipal Allocation Factors	ESI Model	LEHD, ACS, Mod IV
Secondary Source Adjustments			
	LMI Demolitions	ESI Model x (16/10)	NJDCA, ACS
	LMI Conversions	ESI Model x (16/10)	Census, ACS
	Net Filtering	ESI Backcast	Mod IV, ACS, Various
Municipal Allocation Caps	20% and 1,000 unit Standards	ESI Model	ACS, NJDCA

³ “ESI Model” refers to data and calculations from ESI’s *Need and Obligations* report and accompanying workbook, dated 3-24-16, which has been separately submitted to the Court.

Increase in Occupied Households

The gap period calculation begins with a quantification of the incremental number of households added during the gap period. This estimate is a function of the population growth, the population in group quarters (rather than in households), and the headship rate, which together yield an estimate of the total number of households.

As discussed at length in ESI's February 19th *Response to Comments Regarding ESI Need and Obligations Report*, the current headship rate and household count in New Jersey is a source of some controversy. Many data experts contend that the methodology utilized by the annual American Community Survey (which represents the most up to date data source) to estimate households is incompatible with the methodology used in the decennial Census (which is most recently available as of 2010). Accordingly, Dr. Kinsey proposed an approach to incorporate information from both data sets while addressing the data comparability issue in his January 22 alternative gap period model. As noted in our February 19th report, we consider this approach (which in essence "re-bases" the household count from the 2014 ACS to the 2010 Census level, based on the observed overlap between the two sources in 2010)⁴ to appropriately balance the most reliable and up to date data sources, and accordingly we adopt it as the most accurate reflection of the current household count and headship rate as of 2014.

Dr. Kinsey completes the incremental household calculation in his alternative gap model by applying Census 2000 headship rates to the Census-reported population in 1999, and by applying Census-reported population change to extrapolate the 2014 household estimates to 2015. While these procedures do not represent the only potential approach to calculating the gap period household increment consistent with sound statistical principles, it does appropriately rely on Census population counts for 1999 and 2015, and on appropriate sources for household counts (Census 2000 and the mixed Census/ACS 2014 estimate) relevant to those years. Further, alternative extrapolation approaches for the two periods in question (1999 to 2000 and 2014 to 2015) are likely to produce very similar results. We therefore adopt Dr. Kinsey's calculation of the occupied household increment set forth in his alternative gap model within our methodology.⁵

Results for this calculation by region and statewide are shown below in Table 2.2. Statewide, household growth over the gap period is estimated to be approximately 219,000.

⁴ Dr. Kinsey describes this procedure as follows:

The approach used here combines the most reliable data, from the decennial Census, with the most recent data, from ACS, in a two step process. First, the ratio of households estimated by ACS in 2014 to households counted by the 2010 Census is calculated, by county and age group...Second, the 2014 ACS (One-Year) estimate of households is calibrated and adjusted on the basis of the ACS:Census ratio calculated in the first step.

[Jan 22 Kinsey Alternative Gap Period Report, p. 25]

⁵ We note that adoption of this component does not constitute an endorsement of Dr. Kinsey's alternative gap model as an appropriate calculation of affordable housing need emerging from the gap period, for the reasons detailed in our February 8th submission and outlined below in further steps of our gap calculation, which diverge from Dr. Kinsey's models.

**TABLE 2.2: POPULATION AND HOUSEHOLD GAP PERIOD INCREMENT
ADOPTING KINSEY ALTERNATIVE GAP MODEL CALCULATION**

Region	Population 1999	Population 2015	Households 1999	Households 2015	Incremental HH Growth ⁶
1	2,115,099	2,267,096	771,598	827,660	56,060
2	1,878,737	1,960,791	674,567	705,651	31,080
3	1,156,672	1,300,287	413,929	455,561	41,630
4	1,463,253	1,588,989	545,363	587,347	41,980
5	1,182,488	1,250,262	428,478	464,650	36,170
6	563,343	590,588	209,548	221,599	12,050
TOTAL	8,359,592	8,958,013	3,043,483	3,262,468	218,970

LMI Households

Next, it is necessary to determine the proportion of incremental households emerging during the gap period that qualify as low and moderate income (LMI). ESI's *Need and Obligations* report and February 19th *Response to Comments* on that report include an extended discussion of appropriate standards for defining LMI households consistent with the Fair Housing Act, and the flaws in the HUD/COAH income standards utilized in the Kinsey model. We then introduce an approach that replaces those income standards with an LMI definition set at 80% of the observed median income for each household size in each region, consistent with the FHA definition, and this standard is used to calculate the proportion of households by household size and region that qualify as LMI.

The results of this calculation for 2015 within the ESI *Need and Obligations* model form an appropriate basis for estimating the proportion of incremental households emerging during the gap period that are LMI.⁷ These rates are aggregated across household sizes and estimated on a regional basis (varying by region from 39.1% to 40.9%) and are applied to the incremental household growth estimate to yield the estimated LMI household growth for the gap period. Table 2.3 shows that on a statewide basis, approximately 87,300 households (39.9% of the total household increment) are estimated to be LMI.

⁶ Inputs from previous methodologies utilized within this calculation are rounded to the nearest ten (and to two decimals for proportions) for regional inputs and to the nearest unit for municipal calculations. It is worth noting that each of these inputs is itself the result of a series of calculations or estimates, and should be understood as the most accurate estimate available rather than a precise representation of exact conditions.

⁷ See Section 4.4 of ESI's *Need and Obligations* Report for full detail on methodology and calculations

TABLE 2.3: LMI HH GROWTH BY REGION

Region	Incremental HH Growth	% LMI	LMI HH Growth
1	56,060	40.89%	22,920
2	31,080	40.40%	12,560
3	41,630	39.32%	16,370
4	41,980	39.62%	16,630
5	36,170	39.86%	14,060
6	12,050	39.14%	4,720
TOTAL	218,970	39.85%	87,260

Significant Housing Asset Test

Next, it is necessary to estimate how many incremental LMI households have significant housing assets (defined as owning a home valued above the regional asset limit free and clear with no mortgage, and spending less than 38% of eligible income on housing). These households are ineligible for affordable housing according to UHAC standards, and more broadly, their housing needs have clearly been “satisfied.”⁸

ESI's *Need and Obligations* report details the variety of calculations undertaken using ACS Public Use Micro Sample (PUMS) data to determine the proportion of households by region and household size who hold significant housing assets.⁹ These proportions are aggregated by region and applied to the estimate of LMI household growth during the gap period to estimate the incremental eligible LMI households for the gap period. Table 2.4 shows that on a statewide basis, incremental eligible LMI households are estimated to number approximately 79,200.

⁸ While this step is not listed directly in the five steps outlined in the Special Master's February 17th *Bridging the Gap* report, that report stipulates that a methodology should “at minimum be expected to employ the following steps,” which clearly contemplates additional calculations being incorporated beyond the five steps listed. Indeed, as explored below, the five steps alone are insufficient to yield municipal obligations, necessitating additional steps. Further, the significant housing asset test was included in the Special Master's October 30th *Preliminary Assessment and Review* methodology for calculating Round 3 obligations for Ocean County municipalities, and has been included in each COAH methodology since the standard was incorporated into UHAC in 2001.

⁹ See Section 4.5 of ESI's *Need and Obligations* Report for full detail on methodology and calculations

TABLE 2.4: SIGNIFICANT HOUSING ASSET TEST BY REGION

Region	LMI HH Growth	% w/ Housing Assets	(HH w/Assets)	Incremental Eligible LMI HH
1	56,060	6.98%	(1,600)	21,320
2	31,080	6.42%	(810)	11,750
3	41,630	11.74%	(1,920)	14,450
4	41,980	11.42%	(1,900)	14,730
5	36,170	9.63%	(1,350)	12,710
6	12,050	10.82%	(510)	4,210
TOTAL	218,970	9.27%	(8,090)	79,170

Overlap with Present Need

Next, it is necessary to estimate the extent to which the incremental LMI households estimated above overlap with the LMI households occupying deficient units, as identified in the Present Need. Since Present Need represents a separate and additive component of municipal fair share obligations, ESI has consistently maintained that an additive gap calculation (or a retrospective Prospective Need period) will necessarily double count those LMI households which 1) emerge during the gap period, and 2) currently live in deficient housing. While these households appropriately represent current housing need due to their current income and housing status, they are already captured in Present Need, and the Special Master's methodology appropriately recognizes that they therefore must be deducted from the gap period calculation, since their housing needs will be satisfied through another component of the fair share process.

Unfortunately, neither a defined methodology nor a direct data source exists to develop a precise estimate of this overlap. The Present Need methodology set forth in ESI's *Need and Obligations* report yields an estimate of approximately 70,000 unique deficient units occupied by LMI households statewide in 2015. Ideally, an estimate could be developed on the proportion of those 70,000 households that "emerged" during the gap period, whether through migration, household formation, income change into the LMI category, or other factors. Unfortunately, no known data source for such longitudinal tracking of households exists, and thus the proportion of current LMI households that emerged during the gap period is unknown.¹⁰

Absent an ideal measure, a proxy approach was developed to estimate the magnitude of overlap between the gap increment and the Present Need. The incremental growth in the Present Need can be

¹⁰ Note that the increment in LMI households estimated in Table 2.3 is not interchangeable with the proportion of current LMI households that emerged during the gap period. While New Jersey is estimated to have added 87,000 LMI households over the time period, this represents a "net" figure, meaning that 87,000 more LMI households "emerged" during the period than were lost during the period. If only 87,000 LMI households emerged, it this net would necessitate that no LMI households were lost. Unfortunately, as discussed above, no known estimate or reliable methodology for estimating LMI households "emerging" or being "lost" exists.

observed over the period, and in fact is calculated on a municipal level using Census 2000 data in ESI's *Need and Obligations* report in order to extrapolate the Present Need estimate (using the most recent available ACS data) to the start of the Prospective Need period in 2015.¹¹ The incremental growth in Present Need over the gap period can therefore be used as a proxy measure for the extent to which Present Need increases are attributable to the incremental LMI household growth during the period, and therefore represent a double-count between the Present Need and gap calculations.

This approach implicitly assumes that the volume of Present Need existing at the start of the gap period remains and reflects households in existence before the gap, while the additional volume accumulating during the gap period is reflective of newly emerging households. This assumption may well be conservative with respect to the magnitude of the overlap given the turnover in population over such a long period, but it represents a reasonable proxy grounded in data existing within the fair share process.

ESI's *Need and Obligations* report estimated an increase in statewide Present Need (prior to the application of secondary source adjustments or allocation caps) from 52,390 in 2000 to 69,540 in 2015, an increase of approximately 17,150. This estimate is annualized to cover the full gap period by multiplying the increment in each region by (16/15). This estimate is then deducted from the Eligible LMI household estimate developed above by region to yield an estimate of unique eligible LMI households distinct from the Present Need calculation. Table 2.5 shows the result of this calculation, which yields a remainder of approximately 60,200 LMI households.¹²

TABLE 2.5: PRESENT NEED OVERLAP BY REGION

Region	Eligible LMI HH	(Gap Period Present Need Growth)	Unique Eligible LMI HH
1	21,320	(7,770)	13,550
2	11,750	(5,150)	6,600
3	14,450	(2,680)	11,700
4	14,730	(2,970)	11,760
5	12,710	0	12,710
6	4,210	(450)	3,760
TOTAL	79,170	(19,020)	60,150

¹¹ See Section 3 of ESI's *Need and Obligations* Report for full detail on methodology and calculations

¹² Note that in region 5, Present Need is estimated to have decreased from 2000 to 2015. For the purposes of this calculation, the negative value was replaced with a zero, since it is not mathematically possible for the overlap between the two sets of households to be negative.

The Present Need overlap represents the final step of the calculation undertaken on a regional level. Table 2.6 below summarizes the steps undertaken above to arrive at the unique eligible LMI household increment over the gap period by region and aggregated statewide. Remaining steps below detail the assignment of this allocation to municipalities, the adjustment of those municipal allocations to reflect secondary sources of affordable housing generated by the private market, and the allocation caps applied to municipal obligations.

TABLE 2.6: REGIONAL CALCULATION OVERVIEW

Calculation	Statewide	1	2	3	4	5	6
Incremental HH Growth	218,970	56,060	31,080	41,630	41,980	36,170	12,050
(x) LMI Rate	39.85%	40.89%	40.40%	39.32%	39.62%	38.86%	39.14%
(=) LMI HH	87,260	22,920	12,560	16,370	16,630	14,060	4,720
(x) Significant Asset %	9.27%	6.98%	6.42%	11.74%	11.42%	9.63%	10.82%
(-) HH w/Assets	(8,090)	(1,600)	(810)	(1,920)	(1,900)	(1,350)	(510)
(=) Eligible LMI HH	79,170	21,320	11,750	14,450	14,730	12,710	4,210
(-) Present Need Overlap	(19,020)	(7,770)	(5,150)	(2,680)	(2,970)	-	(450)
(=) Unique Eligible LMI HH	60,150	13,550	6,600	11,770	11,760	12,710	3,760

Allocate from Regions to Municipalities

As noted above, the Special Master's February 17th report is silent as to the methodology by which the regional LMI household increment should be allocated to municipalities. Given sufficient municipal data on the gap period, the increment could be estimated directly by municipality, and no allocation formula would be necessary. However, while population and household growth could be estimated by municipality, data is not available to perform income-related calculations (notably the LMI proportion) at the municipal level. Further, an assumption that the LMI proportion in each community is represented by the regional LMI proportion is untenable given the vast income differences between communities.

Therefore, in the absence of data with which to directly determine household growth by municipality or guidance as to an appropriate methodology to allocate household growth to municipalities, the municipal allocation formula applied to Prospective Need in the ESI *Need and Obligations* report and model is utilized for the allocation of the regional gap period LMI household increment to municipalities. As explained at length in the ESI *Need and Obligations* report, this formula averages the regional share of four allocation factors:¹³

¹³ See Section 5 of ESI's *Need and Obligations* Report for full detail on methodology and calculations

- Employment level (responsibility factor)
- Employment change (responsibility factor)
- Aggregate income differences (capacity factor)
- Developable land (capacity factor)

For each municipality, the regional share of the four factors is averaged, and that averaged share is applied to the regional gap allocation to yield the municipal allocation. As in the Prospective Need allocation formula, qualifying urban aid municipalities are excluded (and therefore receive a share of zero). Municipal shares for each region add up to 100%, such that aggregate municipal allocations sum to the regional gap allocation (with minor differences due to rounding, since a municipality cannot be assigned a fractional unit). Table 2.7 below shows a sample calculation for a hypothetical municipality. Appendix B contains the results of this procedure for all municipalities statewide.

TABLE 2.7: SAMPLE MUNICIPAL ALLOCATION CALCULATION

Name	Region	Regional Gap Allocation	Employment Level Share	Employment Change Share	Income Differences Share	Developable Land Share	Averaged Share	Municipal Allocation
abc	1	13,550	1.50%	1.75%	2.25%	2.50%	2.00%	271

It should be reiterated that it is unclear that the capacity and responsibility factors utilized in the Prospective Need methodology are a conceptually appropriate mechanism for the allocation of gap period household growth to municipalities. If these factors are appropriate, it could be argued that the responsibility and capacity of municipalities as of 1999, rather than as of today, is the relevant standard for the gap allocation. In the absence of guidance or precedent, the allocation proportions are retained exactly as calculated in the ESI *Need and Obligations* report.

Secondary Source Adjustment

Next, municipal allocations are adjusted to reflect affordable housing production taking place through private market mechanisms. These supply changes satisfy the affordable housing needs of a portion of incremental LMI households formed during the gap period. The private market mechanisms estimated in ESI's *Need and Obligations* report are demolitions, conversions, and filtering. These categories are retained, and observed data on affordable housing supply are applied directly to the gap period.¹⁴

¹⁴ See Section 6 of ESI's *Need and Obligations* Report for full detail on methodology and calculations on how these data were used to project supply changes for the 2015 – 2025 period

- The estimate of demolitions for the Round 3 period (2015-2025) included in the *ESI Need and Obligations* model is based on observed data by municipality from the gap period (as reported to NJ DCA), which is annualized and projected over a ten year period. To estimate gap period demolitions, this ten year estimate is multiplied by (16/10) to reflect the longer time period.
- The estimate of conversions for the Round 3 period (2015-2025) included in the *ESI Need and Obligations* model is based on residual growth in the housing supply observed in the Census period from 2000 and 2010 and unexplained by other means, which is annualized and projected over a ten year period. To estimate gap period demolitions, this ten year estimate is multiplied by (16/10) to reflect the longer time period.
- Net filtering for the Round 3 period (2015-2025) is estimated based on observed real estate market behavior (in the form of repeat sales) from 2000 to 2015, which is utilized to estimate the number of units filtering down into and up out of the affordable category. To estimate gap period filtering, this same data set is utilized to “backcast” upward and downward filtering to reflect the gap time period.¹⁵

The three secondary source categories are summed together, and resulting in an estimated net change in affordable housing supply for each municipality over the gap period. Together, the three sources of market-based affordable housing supply are estimated to have added a net of approximately 34,000 units of supply over the gap period.

Since demolitions reduce affordable housing supply, conversions increase affordable housing supply, and net filtering may either increase or reduce housing supply, the net impact of secondary sources on supply may be positive or negative for a municipality. Where affordable housing supply is estimated to increase on net, the gap allocation for a municipality would decrease, and vice versa. As in ESI's *Need and Obligations* model, additional housing supply estimated to have been generated in municipalities whose gap allocation is reduced to zero (whether because they are urban aid municipalities that are assigned no allocation, or municipalities where secondary source supply additions exceed the municipal allocation) is pooled regionally, and distributed to other municipalities in the region in proportion with their remaining allocation. This procedure is necessary to align aggregate municipal obligations as closely as possible with the identified increment in LMI households formed but not satisfied during the gap period.

Table 2.8 shows the results of the secondary source estimation and allocation on regional gap period allocations. Full results for each municipality are shown in Appendix C. In aggregate, secondary sources are estimated to add approximately 34,000 units of affordable housing supply, reducing the gap period allocation. However, in Region 1 and Region 2, secondary source adjustments are greater

¹⁵ Note that since repeat transactions represent a subset of the full housing market, filtering during the gap period cannot be counted directly, but needs to be estimated by applying modeled results from the observed data set to the full housing stock. This calculation is undertaken using the same conceptual and modeling approach as the forecast, incorporating known information on the overall volume of transactions.

Full detail, data sources and code for ESI's filtering model (both forecast and backcast) are included in the accompanying spreadsheet to ESI's March 2016 *Need and Obligations* report.

than the aggregate municipal allocation for the gap period. The allocation process thus reduces the gap allocation for all municipalities in those regions to zero. Allocations are not reduced below zero, despite the fact that these excess units suggest that the region has increased affordable housing supply faster than LMI housing need over the gap period. As a result of excluding this additional units, the statewide gap allocation decreases by approximately 5,000, yielding an allocation of approximately 55,000.

TABLE 2.8: SECONDARY SOURCE ADJUSTMENTS TO MUNICIPAL ALLOCATION BY REGION

Region	Municipal Allocation	LMI Demolitions	LMI Conversions	Net Filtering	(Secondary Sources Net)	Adjusted Allocation	Aggregate Adjustment
1	13,548	(6,067)	18,605	8,656	(21,194)	0	(13,548)
2	6,600	(6,040)	4,533	30,030	(28,523)	0	(6,600)
3	11,770	(1,902)	3,921	(16,025)	14,006	25,773	14,003
4	11,753	(6,673)	3,241	6,982	(3,550)	8,208	(3,545)
5	12,710	(3,102)	170	(4,897)	7,829	20,538	7,828
6	3,761	(6,082)	1,787	7,106	(2,811)	949	(2,812)
State	60,142	(29,866)	32,257	31,852	(34,243)	55,468	(4,674)

Municipal Allocation Caps

In addition to its discussion of the gap period, the Court's February 18th opinion sets forth instructions as to the application of the 1,000 unit cap within the fair share calculation. The decision, based on a plain reading of the Fair Housing Act, holds as follows:

In the final analysis, the court finds it is constrained by the clear language of the FHA and therefore the fair share obligation of any municipality, constituting the gap period from 1999 to 2015, the present need and the upcoming third round prospective needs, is subject to that statute's 1000 unit cap.

[February 18 Ocean County Court Oder, p. 26]

The application of the 1,000 unit cap therefore requires combining the pre-cap gap period allocation with the pre-cap Present Need and Prospective Need yielded by the methodology detailed in ESI's *Need and Obligations* report. Similarly, the 20% cap, which is limited to new construction obligations and therefore excludes Present Need, is logically applied to the sum of a municipality's Prospective Need and the gap allocation.

Maximum obligation levels for the 20% cap and eligibility for the 1,000 unit cap are retained from ESI's *Need and Obligations* methodology, which uses the most up to date data to determine the number of currently occupied units in each municipality (for the 20% cap) and the number of certificates of

occupancy issued over the past decade for each municipality (to assess eligibility for the 20% cap).¹⁶ Municipal allocation caps are then applied in succession. Table 2.9 shows the results of the application of municipal allocation caps by region.

- First, the 20% cap is applied to the sum of pre-cap Prospective Need (2015-2025) and the pre-cap Gap Allocation (1999-2015). This results in the reduction of allocations for 24 municipalities by a total of approximately 2,700 units. Where the cap applies, the Gap Allocation is reduced first, then Prospective Need as needed, as set forth in the Court’s February 18th opinion.
- Then, the 1,000 unit cap is applied to sum of pre-cap Present Need (2015), and the remaining Prospective Need and Gap Allocations. This results in the reduction of allocations for 30 municipalities (to a total obligation of 1,000 units each) by a total of approximately 27,400 units. Where the cap applies, the Gap Allocation is reduced first, then Prospective Need, then Present Need as needed, as set forth in the Court’s February 18th opinion.

TABLE 2.9: MUNICIPAL ALLOCATION CAP RESULTS BY REGION

Region	Pre-Cap Present Need (2015)	Pre-Cap Prospective Need (2015-2025)	Pre-Cap Gap Allocation (1999-2015)	Munis w/ 20% Cap	Capped Units (20% Cap)	Munis w/ 1,000 Unit Cap	Capped Units (1,000 Cap)	Capped Present Need (2015)	Capped Prospective Need (2015-2025)	Capped Gap Allocation (1999-2015)
1	21,022	12,657	0	6	(470)	5	(6,260)	15,444	11,505	0
2	8,598	4,536	0	0	0	1	(3,247)	5,351	4,536	0
3	6,147	9,082	25,773	6	(1,509)	14	(14,027)	4,432	9,066	11,968
4	4,239	3,171	8,208	7	(265)	3	(998)	4,239	3,171	6,945
5	2,712	6,855	20,538	5	(425)	8	(2,887)	2,712	6,770	17,311
6	0	0	949	0	0	0	0	0	0	949
State	42,718	36,301	55,468	24	(2,669)	31	(27,419)	32,178	35,048	37,173

Initial Summary Obligations

Finally, capped allocations are summed with Prior Round Obligations from Round 1 and Round 2 (1987 – 1999). As in the ESI *Need and Obligations* methodology, these obligations are retained as calculated by COAH for Round 2 in 1994, with the exception of technical corrections provided by NJ DCA in 2015.

The final step in the methodology set forth in the Special Master’s February 17th report is to adjust obligations for affordable housing activity that took place between 1999 and 2015. As discussed at length in Section 7 of ESI’s *Need and Obligations* report with respect to Prior Round (1987-1999) obligations, no reliable uniform statewide data set exists from which to accurately estimate the level of

¹⁶ See Section 7.3 of ESI’s *Need and Obligations* Report for full detail on methodology and calculations. As noted in that report, all municipalities are found to be eligible for the 1,000 unit cap except for Newark and Jersey City.

adjustments, activity or credits applicable to each municipality. Therefore, no estimate is included in the calculations, and each municipality would have the opportunity to demonstrate this component to the Court, thereby reducing the Initial Summary obligation, in their efforts to secure approvals of their affordable housing plans.

Similarly, the Court's February 18th opinion states with respect to the gap allocation:

Municipalities may petition the court to defer up to 50 percent of its gap obligation to the fourth round. This determination will be made during the court's review of individual municipal plans and will be based on objective factors to be developed by the court with the assistance of its local masters.

[February 18th Opinion, pg. 26-27]

Since the deferral of gap obligation for any municipality is undetermined as of this time, no deferrals are included in the Initial Summary Obligations.

Table 2.10 shows summary obligations statewide and for Ocean County. Initial summary obligations total 190,252 statewide, with the gap allocation comprising 37,173 units, and 14,530 for Ocean County, with the gap allocation comprising 2,902 units.

TABLE 2.10: SUMMARY OBLIGATIONS INCLUDING GAP PERIOD BY REGION AND OCEAN COUNTY

Region	Prior Round Obligation (1987 – 1999)	Present Need (2015)	Prospective Need (2015-2025)	Gap Period Allocation (2015-2025)	Total Initial Summary Obligation
1	12,469	15,444	11,505	0	39,418
2	9,382	5,351	4,536	0	19,269
3	13,323	4,432	9,066	11,968	38,789
4	27,367	4,239	3,171	6,945	41,722
5	14,055	2,712	6,770	17,311	40,848
6	9,257	0	0	949	10,206
TOTAL	85,853	32,178	35,048	37,173	190,252
Ocean County	8,887	1,589	1,152	2,902	14,530

SECTION 3: HOUSEHOLDS IDENTIFIED BY GAP PERIOD CALCULATION

Section 2 of this report identifies the increment of LMI households “formed but not satisfied” in accordance with the Court’s February 18 opinion and the methodological approach described therein and in the Special Regional Master’s February 17 *Bridging the Gap* Report. We now consider its results in the context of the fair share process and total fair share obligations. This section shows that the households included in the gap calculation using the Special Master’s methodology are cost-burdened households living in adequate housing, and discusses the appropriateness of their inclusion in fair share obligations for Round 3. Section 4 then discusses whether these gap obligations are reasonable or practical in the context of private market conditions and past production of affordable housing within the COAH process.

As demonstrated below, the Court-ordered gap period methodology results in an estimate of the net increase in LMI households during the gap period that do not own their homes free and clear, live in adequate housing, and do not live in market-rate housing affordable to LMI households or deed-restricted affordable housing – in other words, cost-burdened households. As discussed in ESI’s February 8, 2016 *Analysis of the Gap Period* and reviewed in detail below, COAH has considered and rejected the expansion of fair share obligations to include cost-burden as a factor in the determination of need. In fact, *AMG Realty* and COAH methodologies both explicitly reject their inclusion, a decision which has been repeatedly affirmed by Court decisions up to and including *Mt. Laurel IV*. As discussed in ESI’s February 8 analysis and below, this exclusion is not arbitrary but is well-reasoned and well justified going back to *AMG Realty*. COAH has also consistently declined to include cost-burdened as a factor within its determination of need; explained why it made this decision; and noted that the inclusion of cost-burden households would generate unrealistic fair share obligations, to the detriment of the fair share process.¹⁷

Finally, as discussed in ESI’s February 8 analysis and reviewed below, the experts for NJBA and Fair Share Housing Center (FSHC) assert that cost-burdened households emerging during the gap period should be quantified and added to fair share obligations because their current status is attributable to COAH’s failings. This claim of causality has not been demonstrated. Further, a methodology for estimating the impact of COAH’s failings has not been advanced for the simple reason that it defies quantification in any non-speculative manner. Consequently, the gap period methodology set forth by the Court and the Special Master and executed in Section 2 of this report makes no attempt to estimate the proportion of these cost-burdened households adversely impacted by COAH’s administrative failings. It does not do so because such an exercise would be hopelessly speculative, based on the impossibility of rewinding the clock and re-creating how the housing market would have evolved. Underscoring this conclusion is information presented by the expert for the New Jersey Builders Association (NJBA) that the incidence of cost-burden among households with incomes above the LMI threshold (80-100% of the median) grew more rapidly in the past two decades than the incidence among LMI households.¹⁸ Faced with the impossibility of rewinding the clock, the Court is left with the question of whether LMI households emerging from the gap period that currently live in adequate housing but are cost-burdened but live in adequate housing qualify as a component of fair share

¹⁷ See for example COAH’s response to Round 1 comments in 18 N.J.R. 1529, cited and discussed at length below.

¹⁸ See p.16-18 of ESI’s February 8th *Analysis of the Gap Period* report for full discussion and data.

obligations, a question which has unfailingly been answered in the negative throughout the history of the fair share process.

Types of LMI Households

The gap calculation methodology set forth in Section 2 of this report undertakes several steps to identify the LMI households “formed but not satisfied” during the gap period, consistent with the Court’s February 18th opinion and the Special Master’s February 17th report. Setting aside the magnitudes involved in those calculations, each component is intended to exclude incremental LMI households that do not represent affordable housing need under the fair share framework, are accounted for in other components of the calculation or have had their housing need “satisfied.” Table 3.1 lists the characteristics of incremental households and their current housing status, and demonstrates which characteristics are excluded from and included in the gap period calculation. The characteristics are listed sequentially, such that a household that satisfies the first condition is then evaluated for the second condition (and so on), while a household that does not satisfy the first condition is eliminated from the calculation. Only those households that satisfy all of the conditions below are ultimately included in the gap calculation.

TABLE 3.1: TAXONOMY OF INCREMENTAL LMI HOUSEHOLDS ADDED DURING THE GAP PERIOD

Characteristic	Possible Conditions	Inclusion in Gap Calculation
Housing Ownership	Own house without mortgage	LMI HH with significant housing assets are excluded from gap calculation
	Do not own house without mortgage	
Housing Unit Quality	Living in Inadequate Housing	LMI HH living in inadequate housing are included in present need and therefore excluded from gap calculation
	Living in Adequate Housing	
Housing Type	Living in market rate affordable housing	LMI households living in market rate housing affordable to LMI HHs are accounted for in secondary sources and excluded from gap calculation
	Living in deed-restricted affordable housing	
	Not living in market rate or deed-restricted affordable housing	LMI HH living in deed-restricted affordable housing will be accounted for through municipal credits and excluded from gap obligation

Therefore, the incremental LMI households identified by the gap period calculation as “formed but not satisfied during the gap period” are those that:

- Do not own their home free and clear of a mortgage (i.e. significant housing assets)
- Currently live in adequate quality housing
- Do not live in market rate units affordable to LMI HHs or deed restricted affordable housing

Put more simply, the households identified by Ocean County’s Court are LMI cost-burdened households living in adequate housing.

Cost-Burden

The gap period submissions of FSHC, NJBA and their respective experts discuss at length the fact that many New Jersey households are cost-burdened.¹⁹ The growth in this group is presented repeatedly as a justification for including the gap period need in the determination of Round 3 obligations. As Special Master Reading explains in his *Bridging the Gap* report with respect to FSHC's gap calculations:

FSHC's defense of its approach has been to suggest an increase in cost-burdened households that are among the Gap Period LMI households that have occupied non-deficient housing

[Reading *Bridging the Gap* Report, p. 8]

Further, the existence of cost-burdened household, and their increase in magnitude, is positioned by FSHC and NJBA as attributable to the administrative failings of COAH, and as evidence of an unsatisfied affordable housing need from the gap period. Unfortunately, this contention is asserted rather than demonstrated, and neither the FSHC gap methodology nor the Special Master's approach even attempt to perform the counter-factual analysis of what the housing status of LMI households would have been had COAH produced and sustained legal fair share obligations during that period. Instead, the Special Master's methodology by its very nature quantifies cost-burdened households from the gap period, and considers all of them to represent unsatisfied fair share need.

All parties are in agreement that, as noted by NJBA expert Art Bernard, "the prior round methodologies do not include any households in the need because they are cost-burdened."²⁰ The potential inclusion of cost-burdened households in the fair share need was considered at length and rejected by Judge Serpentelli in the *AMG Realty vs. Warren Township* case prior to the institution on the Fair Housing Act and the creation of COAH. The AMG opinion includes a comprehensive and well-reasoned explanation for the exclusion of cost-burdened households from the quantification of fair share need, including both practical/methodological considerations and conceptual reasons, outlined below:

In the first instance, it must be recognized that many people do not fully report their income. Second, there are many people who by choice are willing to pay a disproportionate amount of their income for housing. Third, there is a considerable housing "mismatch." On the one hand, some rental units which meet the affordability standards are occupied by families not in a lower income category. On the other hand, lower income families are occupying units which they cannot afford. If the families and units could be matched up, more affordable units, particularly for moderate income households, could be occupied by needy families. Fourth, it must be recognized that many people of retirement age have developed substantial assets which allows them to acquire homes. However, based upon their reported income, they could nonetheless fall into the category of financial need at least within the Mount Laurel II definition. Fifth, some argue that the needs of lower income households can be met more appropriately

¹⁹ While various definitions of cost-burden exist, in this context, cost-burden is here defined as those LMI households whose housing need has not been satisfied by deed-restricted affordable housing (which includes income qualifications) or by market-based secondary sources of affordable housing.

²⁰ *Response to Econsult Report on New Jersey Affordable Housing Obligations*, Art Bernard, Art Bernard and Associates LLC for New Jersey Builders Association, January 2016, page 12.

through income maintenance programs or other extended rent supplement programs rather than the construction of new housing. Sixth, many families in financial need are occupying substandard units thereby creating a duplication in the count of present need. For all of these reasons, it is most difficult to develop a trustworthy count of financial need which should be satisfied through Mount Laurel solutions. In summary, notwithstanding that there is some unmet need, the untrustworthiness of the data and the desire to avoid questionable assumptions compels me to not incorporate this category.

[AMG Realty Co vs. Warren Twp at 423, emphasis added]

ESI's February 8 gap period analysis reviews in detail each of the six rationales for the exclusion of cost-burden set forth in the AMG opinion and explains how each remains in force today. It is worth yet again emphasizing the fifth point in Judge Serpentelli's analysis, particularly in light of the Court's gap period methodology which has isolated LMI households currently living in sound housing units. These households do not have a housing problem – by construction, they live in sound housing. Instead, they have an income problem. The attempt to apply a housing solution to the income problems of gap period cost-burdened households through the fair share process directly contradicts the AMG opinion.

When COAH set forth rules for the calculation of Round 1 fair share obligations in 1987, it followed this precedent in excluding cost-burden households from the Present Need, and did not utilize cost-burden anywhere as a consideration in the fair share methodology. When commenters to the Round 1 rules objected to this determination, COAH explained its rationale as follows:

COMMENT: In determining need, the Council should include those households who are spending a disproportionate amount of their income on housing.

RESPONSE: The Council decided that present need should be a measure of low and moderate income households residing in deficient housing. Moreover this determination reflects the Council's statutory obligation to adopt criteria which make fulfillment of the municipal obligation realistically possible. To include within this estimate those low and moderate income households paying a disproportionate share of their income for housing would have resulted in a need that was beyond the possibility to implement during the six year certification period or during any period in the foreseeable future. Those households spending a disproportionate amount on sound housing exhibit an income problem as opposed to a housing problem. Moreover, the Council's definition of need is in keeping with the court's approach to low and moderate income housing need.

[18 N.J.R. 1529, emphasis added]

COAH thus explicitly considered and rejected the inclusion of cost-burdened households in the fair share calculation. In doing so, it explicitly referenced consistency with the Court's approach to this issue. Further, it references the statutory obligation (derived from the FHA) to make the fulfillment of obligations "realistically possible," as opposed to "impossible to implement" as part of its rationale for choosing not to incorporate cost-burden.

This determination to exclude cost-burden has been maintained by COAH in subsequent rounds and has been challenged through the legal process, where it has been found permissible. This

determination was explicitly affirmed in the Mount Laurel IV decision, which affirmed the Appellate Division with respect to this issue in its instructions on the implantation of its decision:

Five, in addressing the first iteration of the Third Round Rules, the Appellate Division also approved the “exclu[sion of] the cost burdened-poor from the present need or rehabilitation share calculation. In so, the appellate panel noted that pre-FHA courts had also allowed exclusion of the “cost-burdened poor” from the fair share formula. The court found that COAH’s decision to exclude the cost-burdened poor was a permissible exercise of discretion.

[Mt Laurel IV at 45)]

Thus, the question of whether cost-burden is a consideration within the fair share methodology has been explicitly considered, in detail, by both the Courts and COAH.

While the affirmation relates directly to the challenge of excluding cost-burden from Present Need, it is without dispute that cost-burden has not been included as a consideration in any aspect of any COAH methodology. The prior round methodologies that are the basis for the third round methodology to determine fair share, as per Mount Laurel IV, simply do not include cost-burden.

Further, and equally importantly, gap period households are not prospective. They exist as of today. It may be true that had Prospective Need been calculated at some point in the past, those households would have been included in that calculation. The fact remains that as of today, these households currently have housing. In this, they are no differently situated then the LMI households formed before 1999 that currently exist. The Courts and COAH have each considered whether cost-burdened LMI HH should be included as part of the Present Need for affordable housing, as it exists today, along with those LMI households living in inadequate housing units. In each case, the answer has been no.

Linkage between COAH Failings and Gap Households is Speculative

Another troubling aspect of the results yielded by the gap period methodology is that the inclusion of cost-burdened households in the fair share need is explicitly justified by FSHC and its expert based on the purported connection between increases in cost-burdened LMI HHs and the administrative failings of COAH during the gap period. For example, in his January 6, 2016 *Supplemental Report on Gap Period Need*, Dr. Kinsey writes that “the sharp increases in cost-burdened LMI HH are evidence of the repeated failures of COAH to adopt and enforce constitutional housing obligations” (9).

This causal connection has not been demonstrated. As discussed at length in ESI’s February 8 *Analysis of the Gap Period* report, NJBA expert Art Bernard presents data on the statewide increase in cost-burdened households from 1992 to 2011 which shows that (1) not all cost-burdened households are LMI, and not all LMI households are cost-burdened; and (2) the rate of cost-burden increased far more rapidly for those households that were not LMI than for those that were LMI in the data presented by Mr. Bernard.²¹ Taken together, these facts demonstrate that cost-burden impacts households both

²¹ See p.16-18 of ESI’s February 8th *Analysis of the Gap Period* report for full discussion and data

within and outside of the LMI segment of the population, and by definition impacts households entirely outside of the COAH process. The notion that these statistics, which show a lower increase in cost-burden among LMI households relative to non-LMI households, serve as evidence of the consequences of COAH's failures is without basis.

Empirically, the question of the attribution of the increase in cost-burden to COAH's failings defies any practical calculation. As noted in ESI's Feb 8 analysis, it is impossible to "rewind the clock" and determine the extent to which housing development would have been altered by the successful implementation of COAH rules in 1999. An appropriate counter-factual analysis would have to address questions (including: how many deed-restricted units would have been built during the period, how many fewer market rate units would have been built due to the financial implications of fair share requirements, how many private sector market units would have been displaced by deed-restricted activity, and what effect these changes would have had on local real estate markets) that can only be answered speculatively due to the dynamic rather than static nature of housing markets.²²

Importantly, the gap period methodology set forth by the Court's February 18 opinion and the Special Master's February 17 report does not attempt to address this question. The method identifies the net increase in LMI households during the gap and narrows to include households which were not "satisfied" which, as explained throughout this section, represents cost-burdened households, and considers all of those households to be part of the fair share obligation. There is no notion of causality by COAH in this method. Excluding causality is mechanically understandable because attempts to determine the proportion of those identified households who are cost-burdened due to the failings of COAH would be entirely speculative, as noted above. Conceptually, however, this omission is highly problematic, since the explicit rationale advanced for including these households in the first place is that they have been harmed by COAH's administrative failings. Ignoring this attribution issue in the methodology implicitly assumes that all of the cost-burdened gap households would have been satisfied under a functioning COAH process, and have thus been directly harmed by COAH's failings. This implicit assumption is made without any supporting evidence or empirical basis.

²² See pg. 7-9 of ESI's February 8th *Analysis of the Gap Period* report for a more complete discussion of this issue

SECTION 4: AFFORDABLE HOUSING PRODUCTION CONTEXT

The methodology set forth in ESI's *Need and Obligations* report seeks to quantify the Present Need and Prospective Need as accurately as possible, consistent with prior round methodologies and Mount Laurel IV directives. The gap period methodology set forth in this report seeks to quantify the magnitude of LMI households formed but not satisfied during the gap period, consistent with the Court's February 18th opinion and concluding order and the Special Master's February 17th *Bridging the Gap* report.

Neither methodology set forth by ESI incorporates any consideration of whether the proposed allocations are reasonable and realistic. However, the Fair Housing Act (FHA) says that the standards and guidelines should be "reasonable." Accordingly, it is appropriate to consider the development potential of the inclusionary zoning mechanism, including the historical production of deed-restricted units within prior rounds and forward-looking patterns of growth and development in New Jersey. These issues bear on the question of whether housing obligations yielded by the fair share methodology are at all reasonable and achievable.

The obligations identified in FSHC/Kinsey's report are significantly greater than the historical and projected capacity to supply affordable housing and are not realistically possible to implement. The obligations identified in the ESI *Need and Obligations* report are aggressive but potentially achievable, though the addition of a gap period obligation renders the obligations unachievable.

These considerations are particularly relevant in light of the Court's February 18th opinion with respect to obligations emerging from the gap period. To the extent that obligations for the Present Need and Prospective Need period already match or exceed the potential for New Jersey's municipalities to meet the obligations over the next decade, adding a new category of need covering sixteen years is unlikely to generate additional affordable housing, but instead will frustrate the efforts of municipalities to comply with assigned obligations through their housing plans.

Fair Housing Act Guidance

The FHA makes the legislature's vision for the promulgation of realistic obligations within the fair share process clear throughout its text. The act begins with a series of "Findings" (Section 302) and a "Declaration" (Section 303) that state the intent of the act. Those sections read in part:

The interest of all citizens, including low and moderate income families in need of affordable housing, and the needs of the workforce, would be best served by a comprehensive planning and implementation response to this constitutional obligation.

[FHA 302c, emphasis added]

There are a number of essential ingredients to a comprehensive planning and implementation response, including the establishment of reasonable fair share housing guidelines and standards, the initial determination of fair share by officials at the municipal level and the preparation of a municipal housing element, State review of the local fair share study and housing element, and continuous State funding

for low and moderate income housing to replace the federal housing subsidy programs which have been almost completely eliminated.

[FHA 302d, emphasis added]

The Legislature declares that the State's preference for the resolution of existing and future disputes involving exclusionary zoning is the mediation and review process set forth in this act and not litigation, and that it is the intention of this act to provide various alternatives to the use of the builder's remedy as a method of achieving fair share housing.

[FHA 303, emphasis added]

In its findings and declaration, the FHA posits that the fair share process outlined within represents a "comprehensive planning and implementation response" to the constitutional obligation, meaning the framework set forth within includes implementation within a reasonable planning process. The act then goes on to define a comprehensive planning and implementation process as defined in part by "the **establishment of reasonable fair share housing guidelines and standards,**" explicitly considering the "reasonableness" of fair share obligations through the lens of implementation. Finally, the FHA is unambiguous in its intent to **move the implementation mechanism for affordable housing away from the builder's remedy and towards the administrative process set forth by the act.**

Another crucial section of the FHA with respect to Fair Share methodology is in Section 307. Section 307(c)(2), which defines seven considerations under which municipal need should be adjusted due to practical realities, including "available vacant and developable land, infrastructure consideration or environmental or historic preservation factors." Later in Section 307, the FHA sets forth relevant considerations for COAH in its determination of fair share obligations:

In carrying out the above duties, including, but not limited to, present and prospective need estimations the council shall give appropriate weight to pertinent research studies, government reports, decisions of other branches of government, implementation of the State Development and Redevelopment Plan prepared pursuant to sections 1 through 12 of P.L.1985, c.398 (C.52:18A-196 et seq.) and public comment. To assist the council, the State Planning Commission established under that act shall provide the council annually with economic growth, development and decline projections for each housing region for the next ten years. The council shall develop procedures for periodically adjusting regional need based upon the low and moderate income housing that is provided in the region through any federal, State, municipal or private housing program. [FHA - Section 307]

[FHA 307(e), emphasis added]

The FHA plainly states that COAH within the fair share process ""shall give appropriate weight" to economic and development factors in the determination and assignment of obligations. This is entirely consistent with the "Findings" and "Declarations" of the act which sets forth a process based on reasonable standards that sets targets that are achievable through sound planning and voluntary compliance, replacing "the use of the builder's remedy as a method of achieving fair share housing."

COAH's implementation of the FHA in its Round 1 methodology and process explicitly recognizes and embraces this statutory obligation. As noted in Section 3, commenters to COAH's Round 1 methodology objected to COAH's determination to exclude cost-burdened households from the Present Need. COAH's response not only addresses the issue of cost-burden, but also its statutory obligation under the FHA to produce realistic obligations that are possible to implement:

COMMENT: In determining need, the Council should include those households who are spending a disproportionate amount of their income on housing.

RESPONSE: The Council decided that present need should be a measure of low and moderate income households residing in deficient housing. Moreover this determination reflects the Council's statutory obligation to adopt criteria which make fulfillment of the municipal obligation realistically possible. To include within this estimate those low and moderate income households paying a disproportionate share of their income for housing would have resulted in a need that was beyond the possibility to implement during the six year certification period or during any period in the foreseeable future. Those households spending a disproportionate amount on sound housing exhibit an income problem as opposed to a housing problem. Moreover, the Council's definition of need is in keeping with the court's approach to low and moderate income housing need.

[18 N.J.R. 1529, emphasis added]

COAH's response makes explicit its interpretation of the FHA as requiring "criteria which make the fulfillment of the municipal obligation realistically possible" and its rejection of the assignment of "need that was beyond the possibility to implement."

Potential Future Deed-Restricted Affordable Housing Production

Dr. Robert Powell prepared an analysis of housing growth potential for the New Jersey State League of Municipalities (NJLM) which was submitted on September 22nd ("Powell Report").²³ This report, which reviews economic, demographic and housing market trends in New Jersey, was reviewed by Special Regional Master Richard Reading in his October 30th *Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*. In that report, Special Master Reading explains the relevance of the information provided by Dr. Powell to the consideration of fair share obligations:

Although Dr. Powell's report does not present an alternative methodology for the calculation of Ocean County's affordable housing obligations, the information contained therein may offer a useful insight into the issues that are involved in satisfying affordable housing needs...

Economic constraints are important considerations and demographic changes, particularly in longer term projections, need to be carefully considered.

²³ The report is entitled: *Demographic and Economic Constraints on the Inclusionary Zoning Strategy Utilized for the Production of Low and Moderate Income Housing in New Jersey*. Submitted September 22, 2015 to the New Jersey State League of Municipalities by Robert S. Powell, Jr., Ph.D. and Gerald Doherty, M.A. of Nassau Capital Advisors, LLC.

[Oct 30 Reading Report (*Preliminary Review and Assessment of Low and Moderate Income Housing Needs of Ocean County Municipalities*), pg.6, pg. 9]

One important market constraint surfaced by Dr. Powell are the recent trends in growth and development in the state of New Jersey. As explained in the Powell report (and in ESI's February 8th *Analysis of the Gap Period*) the assumption that population growth and the attendant housing demand would take place primarily in the suburbs undergirds the fair share methodology, which excludes qualifying Urban Aid municipalities from the allocation of regional Prospective Need and accordingly anticipates that affordable housing development through inclusionary zoning will take place primarily in the suburban and exurban areas. Recent data turns this assumption on its head, demonstrating that demand for housing is in fact returning to urban areas. A recent well-publicized Rutgers study, for example, found that from 2010 to 2013, the population of the regional core of eight urban counties in northern New Jersey and New York grew at more than twice the rate of the suburban ring of the region.²⁴

This shift in demand bears directly on whether the fair share obligations advocated by FSHC are realistic and thus reasonable. The very urban municipalities at the center of population growth for New Jersey are those excluded from Prospective Need obligations. Therefore, other lower growth municipalities are assigned obligations out of proportion with their demonstrated capacity to produce market rate housing (and thus affordable housing via inclusionary zoning). Specifically, Certificates of Occupancy (CO) data from the New Jersey Department of Community Affairs utilized within the fair share methodology shows that from 2000 – 2014, 21 percent of statewide CO's (approximately 66,000 out of 318,000) were located in the 41 urban aid municipalities that are excluded from the allocation of Prospective Need. Consistent with the Rutgers findings on current patterns, that proportion grew to 24% from 2010 to 2014. Therefore, at least one-fifth to one-quarter of all market rate development is unable to assist in fulfilling the Prospective Need allocated to municipalities because it takes place in urban aid municipalities.

Dr. Powell's report includes an estimate of the number of deed-restricted affordable housing units that might reasonably be expected to be constructed between 2015 and 2025. Dr. Powell based his forward-looking estimate on the recent history of housing production in New Jersey, and related affordable housing production to market rate construction. He created three forecasts, based in historic market rate production of housing, which he identifies as "Achievable," "Optimistic," and "Very Aggressive." His method estimates the overall number of new units, subtracts away units in urban aid municipalities (conservatively assumed to be 20% of the total) and estimates that 60% of the remainder would be subject to an inclusionary development plan. Of this remaining number, he assumes that 20 percent would be deed-restricted affordable units. His "Achievable" forecast of deed-restricted affordable units is 17,280 over ten years, or 1,728 per year on average.

²⁴ See: *The Receding Metropolitan Perimeter: A New Post-Suburban Demographic Normal*, Bloustein School of Planning at Rutgers, available at (<http://bloustein.rutgers.edu/new-rutgers-regional-report-compares-population-shifts-following-major-economic-changes/>)

TABLE 4.1: SCENARIOS FOR AFFORDABLE HOUSING PRODUCTION, 2015-2025

Alternative Growth Assumptions	Aggregate 10-Year Total New units 2015-2025	Adjusted 10-Year Totals Excluding 20% in Urban Aid Towns	New Units 2015-2025 Subject to Inclusionary Development Plan	Projected Total New Affordable Units 2015-2025	Projected Average Annual New Affordable Units 2015-2025
Very Aggressive	400,000	320,000	192,000	38,400	3,840
Optimistic	250,000	200,000	120,000	24,000	2,400
Achievable	180,000	144,000	86,400	17,280	1,728

Source: (Powell Report)

This figure, grounded in data on the level and trends of housing production and the economic outlook for the State of New Jersey, represents an important benchmark of fair share obligation levels that are realistically possible to implement over the next decade.

Historic Affordable Housing Production through the COAH Process

An additional gauge of whether the allocations proposed by FSHC are realistic and therefore reasonable is to look at the history of affordable housing production within Round 1 and Round 2 of the COAH process, when the agency produced obligations approved by the courts and oversaw the implementation regime to satisfy those obligations. The Mt. Laurel IV decision indicates throughout that the methodology and process undertaken in Round 1 and Round 2 represent the “normal” to which the decision seeks to return the fair share process.

COAH’s annual report from 2003 (incorporated by reference) provides detailed statistical information on the production of COAH-certified housing from the start of the COAH process up through that time. Within, COAH reports:

Through December 31, 2003 credits have been granted for....

34,986 complete or under construction New Construction units

Zoning approvals for 9,182 units

13,874 rehabilitated units

8,650 units transferred through RCAs

[New Jersey Council on Affordable Housing, Annual Report 2002 -2003, p. 5]

The period between the publishing of Round 1 rules in June 1986 and the reporting date for these figures at the conclusion of 2003 covers more than seventeen years (and in fact includes units built outside of those years, since the FHA and COAH’s Round 1 rules give credits for affordable units built back to 1980). Those seventeen and half years comprise a period in which the COAH implementation regime was fully functioning, and the New Jersey housing market was largely experiencing growth.

During those years, COAH certified the completion or construction of approximately 35,000 new construction affordable housing units, or **approximately 2,000 per year**. This figure aligns very closely with the annual realistic development potential for the development of new units under inclusionary zoning over the next decade identified by Dr. Powell.

Estimates of New Construction Obligations

Careful examining of both the market-based potential for deed-restricted affordable housing and the history of affordable housing production under COAH each suggest that approximately 2,000 new construction units annually might reflect a statewide fair share obligation that is realistically achievable. ESI and FSHC have each offered calculations of affordable housing obligations for Round 3, and Section 2 of this report presents additional calculations of gap period housing need according to the methodology set forth in the Court's February 18th opinion and the Special Master's February 17th report.

FSHC/Kinsey

Discerning the appropriate level of municipal obligations yielded by the FSHC/Kinsey model is challenging, due to Dr. Kinsey's decision to extend the Prospective Need period for 26 years, including a substantial retroactive component, and to apply the 1,000 unit cap exclusively to the Prospective Need obligation. The Ocean County Court has thus far confirmed that each of these methodological decisions violate the plain text of the FHA, and in its February 18th opinion states that the Prospective Need period encompasses only ten years and that the 1,000 unit cap incorporates Present Need, Prospective Need and any gap period allocation.

As of this writing, it is unknown how Dr. Kinsey will adjust his model to address these issues, or whether Dr. Kinsey and FSHC will submit a revised calculation reflective of the other deficiencies in the Kinsey Model that have come to light since its publication in July 2015. Nevertheless, it is possible from Dr. Kinsey's prior calculations to extrapolate the resulting housing obligations, and to compare them to the inclusionary zoning estimates developed by Dr. Powell and the historic affordable housing production reported by COAH during Rounds 1 and 2 to evaluate whether the obligations calculated by Dr. Kinsey are realistically achievable in the upcoming decade.

Table 4.2 illustrates the aggregate affordable housing obligations currently assigned by Dr. Kinsey to municipalities in his various submissions. Prior to the application of secondary sources of affordable housing, obligations caps or credits, aggregate municipal obligations total approximately 396,000.

**TABLE 4.2: FSHC/KINSEY CALCULATED AFFORDABLE HOUSING NEED
PRIOR TO THE IMPOSITION OF SECONDARY SOURCES OF AFFORDABLE HOUSING, OBLIGATION CAPS OR CREDITS**

Region	Prior Round Obligation (1987 – 1999)	Present Need (2010)	Prospective Need (2015-2025)	Gap Period Need (1999 – 2015)	Total
1	12,471	24,055	35,411	12,876	84,813
2	9,294	16,839	30,980	20,170	77,283
3	13,323	6,535	23,108	18,478	61,444
4	27,359	7,155	22,093	24,045	80,652
5	14,056	4,217	19,364	23,460	61,097
6	9,372	3,256	8,098	9,578	30,304
TOTAL	85,875	62,057	139,054	108,606	395,591

- Prior Round obligations in the Kinsey model are retained as initially assigned, and subject to reduction based on the level of activity demonstrated by municipalities towards those obligations. As discussed in ESI's *Need and Obligations* report, no reliable data source exists on the extent to which those obligations have been satisfied.
- Present Need may be satisfied through a combination of rehabilitation and new construction activities.
- Prospective need is estimated by subtracting from Dr. Kinsey's full Prospective Need calculation in his July 2015 model the gap period Prospective Need calculation submitted by Dr. Kinsey in his January 22, 2016 submission to the Court, which truncated the 1999 – 2025 Prospective Need calculations in the July 2015 Kinsey model to the 1999 – 2015 gap period.²⁵
- Gap period need is reported as calculated by Dr. Kinsey in the "Alternative Model" in his January 22nd submission to the Court, which replaced the assumptions in the original Kinsey model with observed data on the gap period.

Obligations shown in Table 4.2 do not include secondary sources of housing supply, which are only calculated for Ocean County municipalities within Dr. Kinsey's alternative gap model. These market-based sources result in significant reductions in housing obligations within ESI's analysis, based on observed data from the gap period and resulting projections of likely activity over the next decade. However, as documented extensively by ESI, a flawed approach to the allocation of these secondary sources within the July 2015 Kinsey model leads to an increase in the obligation of approximately 7,000 units, despite the fact that three sources are anticipated within Dr. Kinsey's model to generate a net of approximately 18,000 units of affordable housing, for a net decrease of approximately 25,000 units.

²⁵ As noted in ESI's February 8th *Analysis of the Gap Period*, Dr. Kinsey and FSHC continue to maintain the validity of this July 2015 calculation despite the virtual impossibility of achieving the level of LMI households projected by the model for 2025 given the current level of LMI households as submitted by Dr. Kinsey in his alternative gap model.

Further, as noted in ESI's Feb 8 *Analysis of the Gap Period*, this mistreatment of secondary sources extends to Dr. Kinsey's alternative gap model, resulting in an assigned aggregate obligation for Ocean County municipalities of 9,778, well in excess of Dr. Kinsey's identified LMI household need of 8,061 (an increase of approximately 1,700, or 21%). Therefore, the exclusion of Secondary Sources from Table 4.2 above is in fact conservative in the context of the Kinsey Model, which systematically results in Secondary Source adjustments that increase, rather than decrease, municipal obligations.

Obligations shown in Table 4.2 also do not reflect the 20% and 1,000 unit municipal obligation caps, due to the significant variance between the manner in which those caps are applied in the Kinsey model and plain text of the FHA, and resulting instructions to the Special Regional Master in the Court's February 18th opinion and concluding order. The magnitude of an appropriate application of the 1,000 unit and 20% caps on the Kinsey calculation of obligation are unknown. It is known that Dr. Kinsey's application of the 20% cap and 1,000 unit cap to the Prospective Need calculated from 1999 – 2025 resulted in a reduction from 292,000 to 202,000 units, a reduction of approximately 1/3. While obligations from the 26 year Prospective Need periods are inflated relative to a 10 year Prospective Need period, the Court's February 18th opinion applies the 1,000 unit cap to the Prospective Need, Present Need, and Gap Period obligations.

In addition, as noted above, obligations shown in Table 4.2 do not include applicable credits for municipalities for prior activity, since reliable information on the magnitude of these credits is not available on a statewide basis.

Due to these factors, the exact new construction obligations currently yielded by the Kinsey methodology cannot be calculated precisely. Even assuming that approximately half of the obligation is reduced based on credits, deferred gap obligations, and municipal caps would still yield an aggregate obligation of 200,000 units to be delivered over a ten year period, or 20,000 units per year. This estimated obligation is approximately 10 times as large as Dr. Powell's projection of achievable production levels of affordable housing through inclusionary zoning and of observed deed-restricted affordable housing production from Round 1 and Round 2. Indeed, it is approximately equal to the average level of *total* housing production in New Jersey over the gap period.²⁶ **Such an obligation is clearly not reasonable and not possible to achieve within the fair share process based on municipal compliance and sound planning.**

It is also important to note that by the cumulative methodology endorsed by the Court, the assignment of unrealistic obligations for Round 3 will result in an excessive unfulfilled Round 3 obligation that will roll over into Round 4.²⁷ This unfulfilled obligation is in addition to the proportion of the gap obligation which municipalities may petition to defer into Round 4, according to Court's February 18th opinion. Thus, according to this methodology and Dr. Kinsey's calculation, Round 4 would likely to begin with hundreds of thousands of units of obligations imposed on municipalities even prior to the imposition of

²⁶ As reported in Section 6.3 of ESI's *Need and Obligations* report, statewide certificates of occupancy totaled approximately 318,000 from 1999 – 2014, or approximately 21,000 per year.

²⁷ For example, assuming affordable housing production of approximately 2,000 units a year, in accordance with market projections and observed production under COAH, an obligation of 20,000 units a year over the 2015-2025 period would yield an unsatisfied obligation of approximately 180,000 units that would carry over to Round 4.

the Present Need and Prospective Need for that ten year period, which themselves would likely add tens or hundreds of thousands of additional units of obligation for that period. Such growth in obligations is plainly neither sustainable nor realistic, nor does it provide municipalities with a realistic path to voluntary compliance and the actual production of affordable housing.

ESI

ESI's *Need and Obligations* report quantifies Present Need as of 2015, Prospective Need for 2015-2025 in accordance with the FHA and maintains unfilled Prior Round (1987-1999) obligations in accordance with Mt. Laurel IV. Collectively, these three categories result in a total obligation of 153,000 units. Prospective Need, which represents newly assigned new construction obligations, totals 34,000, or 3,400 per year.

TABLE 4.3: ESI CALCULATED INITIAL SUMMARY OBLIGATIONS, 2015-2025

Region	Prior Round Obligation (1987 – 1999)	Present Need (2015)	Prospective Need (2015-2025)	Total
1	12,469	15,289	11,660	39,418
2	9,382	5,351	4,536	19,269
3	13,323	5,608	7,890	26,821
4	27,367	4,239	3,171	34,777
5	14,055	2,712	6,770	23,537
6	9,257	0	0	9,257
TOTAL	85,853	33,199	34,027	153,079

As noted above, the extent to which the Prior Round obligations remains unsatisfied is unknown, and Present Need obligations can be met through rehabilitation or new construction. Total new construction obligations in excess of the Prospective Need under this methodology are therefore unknown as of this time. In addition, a percentage of these units may be satisfied with bonuses. The Prospective Need obligation of approximately 3,400 units per year is 70 percent greater than the 2,000 units per year of new affordable housing construction reported by COAH historically, and is situated in between the "optimistic" (2,400) and "very aggressive" (3,840) scenarios for annual affordable housing production under inclusionary zoning in the 2015 Powell report. Obligations resulting from this methodology are therefore aggressive relative to anticipated new construction activity, but are certainly more realistic than those set forth by FSHC.

Inclusion of the gap period allocation in ESI's affordable housing methodology produces new construction obligations far in excess of realistic goals. As shown in Table 4.4, the inclusion of the gap allocation, after applying municipal caps, increases total obligations by approximately 37,000 units.

TABLE 4.4: ESI CALCULATED OBLIGATIONS INCLUDING GAP PERIOD

Region	Prior Round Obligation (1987 – 1999)	Present Need (2015)	Prospective Need (2015-2025)	Gap Period Allocation (2015-2025)	Total
1	12,469	15,444	11,505	0	39,418
2	9,382	5,351	4,536	0	19,269
3	13,323	4,432	9,066	11,968	38,789
4	27,367	4,239	3,171	6,945	41,722
5	14,055	2,712	6,770	17,311	40,848
6	9,257	0	0	949	10,206
TOTAL	85,853	32,178	35,048	37,173	190,252

Under this methodology, statewide annualized new construction obligations from the combined Prospective Need and Gap Allocation more than doubles to 7,200 per year. This figure is 260% greater than historic trends in affordable housing production. Imposing the gap period obligation therefore draws the yearly Mount Laurel obligation well above realistic expectations for what can be supported by private market production.

Summary

As reviewed throughout this section, such an assignment of excessive obligations defies what COAH termed the “statutory obligation” under the FHA to “adopt criteria which make fulfillment of the municipal obligation realistically possible.”²⁸ As a practical matter, assigning obligations far beyond what the market can realistically support is unlikely to generate additional affordable housing production. Instead, excessive obligations likely frustrate municipal efforts at voluntary compliance, leading the production of affordable housing out of the comprehensive planning and implementation framework envisioned by the FHA and back to the builder’s remedy method.

Further, under the suggested cumulative methodology, the assignment of excessive Round 3 obligations is not a one-time occurrence but will instead remain with municipalities indefinitely in the form of unsatisfied obligations rolling over into each new cycle, in addition to the newly assigned Present Need and Prospective Need for each round. Such growth in obligations is neither sustainable nor realistic relative to market capabilities, and therefore inconsistent with the language of the FHA, and does not provide municipalities with a realistic path to voluntary compliance as envisioned by the Fair Housing Act.

²⁸ 18 N.J.R 1529

APPENDIX A: MUNICIPAL ALLOCATION OF OBLIGATIONS

TABLE A.1: OCEAN COUNTY MUNICIPAL ALLOCATION FACTORS

Municipality	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Barnegat township	11,760	0.50%	0.96%	0.77%	3.95%	1.54%	181
Barnegat Light borough	11,760	0.03%	0.09%	0.50%	0.00%	0.16%	18
Bay Head borough	11,760	0.04%	0.00%	0.57%	0.02%	0.16%	19
Beach Haven borough	11,760	0.12%	0.21%	0.50%	0.00%	0.21%	24
Beachwood borough	11,760	0.17%	0.00%	0.79%	0.11%	0.27%	31
Berkeley township	11,760	0.99%	1.18%	0.87%	4.58%	1.90%	224
Brick township	11,760	3.96%	5.92%	2.45%	1.63%	3.49%	410
Eagleswood township	11,760	0.11%	0.25%	0.42%	1.65%	0.61%	71
Harvey Cedars borough	11,760	0.02%	0.00%	0.60%	0.00%	0.15%	18
Island Heights borough	11,760	0.06%	0.04%	0.53%	0.06%	0.17%	20
Jackson township	11,760	2.07%	3.28%	2.45%	10.94%	4.68%	551
Lacey township	11,760	1.09%	1.13%	1.14%	1.94%	1.32%	156
Lakehurst borough	11,760	0.11%	0.00%	0.35%	0.03%	0.12%	14
Lakewood township	11,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lavallette borough	11,760	0.06%	0.00%	0.43%	0.00%	0.12%	15
Little Egg Harbor township	11,760	0.45%	0.00%	0.69%	5.30%	1.61%	189
Long Beach township	11,760	0.18%	0.15%	0.68%	0.00%	0.25%	30
Manchester township	11,760	0.99%	1.61%	0.65%	7.51%	2.69%	316
Mantoloking borough	11,760	0.00%	0.00%	1.10%	0.00%	0.28%	32
Ocean township	11,760	0.25%	0.54%	0.68%	2.67%	1.03%	122
Ocean Gate borough	11,760	0.02%	0.00%	0.37%	0.02%	0.10%	12
Pine Beach borough	11,760	0.05%	0.03%	0.63%	0.01%	0.18%	21
Plumsted township	11,760	0.25%	0.45%	0.64%	0.01%	0.34%	40
Point Pleasant borough	11,760	0.75%	0.00%	1.10%	0.23%	0.52%	61
Point Pleasant Beach bor.	11,760	0.59%	0.74%	0.54%	0.24%	0.53%	62
Seaside Heights borough	11,760	0.10%	0.00%	0.00%	0.00%	0.02%	3
Seaside Park borough	11,760	0.03%	0.00%	0.28%	0.00%	0.08%	9
Ship Bottom borough	11,760	0.09%	0.00%	0.32%	0.00%	0.10%	12
South Toms River borough	11,760	0.08%	0.00%	0.39%	0.09%	0.14%	16
Stafford township	11,760	1.56%	0.62%	1.13%	2.11%	1.35%	159
Surf City borough	11,760	0.09%	0.12%	0.39%	0.00%	0.15%	18
Toms River township	11,760	7.35%	0.07%	3.20%	4.64%	3.81%	449
Tuckerton borough	11,760	0.20%	0.63%	0.36%	0.62%	0.45%	53
Ocean County Total	11,760	22.33%	18.01%	25.52%	48.36%	28.56%	3,356

TABLE A.2: OCEAN COUNTY SECONDARY SOURCE ADJUSTMENTS

Municipality	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Barnegat township	181	(21)	11	(19)	29	(114)	96
Barnegat Light borough	18	(10)	13	(44)	41	(32)	27
Bay Head borough	19	(24)	3	(17)	38	(31)	26
Beach Haven borough	24	(106)	50	(185)	241	(144)	121
Beachwood borough	31	(29)	6	161	(31)	0	0
Berkeley township	224	(122)	24	1,800	(224)	0	0
Brick township	410	(362)	62	289	11	(229)	192
Eagleswood township	71	(10)	2	12	(4)	(36)	31
Harvey Cedars borough	18	(14)	13	(21)	22	(22)	18
Island Heights borough	20	(13)	2	(23)	34	(29)	25
Jackson township	551	(27)	32	(184)	179	(397)	333
Lacey township	156	(106)	8	178	(80)	(41)	35
Lakehurst borough	14	(2)	8	64	(14)	0	0
Lakewood township	0	(365)	197	(606)	774	(421)	353
Lavallette borough	15	(130)	54	(152)	228	(132)	111
Little Egg Harbor township	189	(158)	22	284	(148)	(22)	19
Long Beach township	30	(317)	134	(374)	557	(319)	268
Manchester township	316	(86)	218	508	(316)	0	0
Mantoloking borough	32	(29)	0	(2)	31	(34)	29
Ocean township	122	(59)	2	10	47	(92)	77
Ocean Gate borough	12	(11)	6	55	(12)	0	0
Pine Beach borough	21	(2)	0	2	0	(11)	10
Plumsted township	40	(18)	11	(57)	64	(57)	47
Point Pleasant borough	61	(158)	42	(219)	335	(215)	181
Point Pleasant Beach bor.	62	(109)	43	(390)	456	(282)	236
Seaside Heights borough	3	(90)	109	23	(3)	0	0
Seaside Park borough	9	(86)	40	(262)	308	(172)	145
Ship Bottom borough	12	(101)	43	(199)	257	(146)	123
South Toms River borough	16	(2)	2	70	(16)	0	0
Stafford township	159	(218)	18	(180)	380	(293)	246
Surf City borough	18	(88)	42	(163)	209	(124)	103
Toms River township	449	(778)	77	(308)	1,009	(793)	665
Tuckerton borough	53	(19)	5	36	(22)	(17)	14
Ocean County Total	3,356	(3,670)	1,299	87	4,380	(4,205)	3,531

TABLE A.3: OCEAN COUNTY ALLOCATION CAPS

Municipality	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Barnegat township	63	7	96	0	0	166
Barnegat Light borough	12	0	27	0	0	39
Bay Head borough	1	12	26	0	0	39
Beach Haven borough	3	27	121	(45)	0	106
Beachwood borough	0	0	0	0	0	0
Berkeley township	0	0	0	0	0	0
Brick township	262	0	192	0	0	454
Eagleswood township	0	5	31	0	0	36
Harvey Cedars borough	3	4	18	0	0	25
Island Heights borough	3	23	25	0	0	51
Jackson township	56	74	333	0	0	463
Lacey township	48	0	35	0	0	83
Lakehurst borough	0	0	0	0	0	0
Lakewood township	533	412	353	0	(298)	1,000
Lavallette borough	0	33	111	0	0	144
Little Egg Harbor township	0	0	19	0	0	19
Long Beach township	16	65	268	(63)	0	286
Manchester township	0	0	0	0	0	0
Mantoloking borough	0	19	29	(28)	0	20
Ocean township	6	74	77	0	0	157
Ocean Gate borough	0	0	0	0	0	0
Pine Beach borough	0	0	10	0	0	10
Plumsted township	14	44	47	0	0	105
Point Pleasant borough	11	80	181	0	0	272
Point Pleasant Beach bor.	36	64	236	0	0	336
Seaside Heights borough	79	0	0	0	0	79
Seaside Park borough	30	19	145	(35)	0	159
Ship Bottom borough	0	57	123	(85)	0	95
South Toms River borough	0	0	0	0	0	0
Stafford township	114	0	246	0	0	360
Surf City borough	3	22	103	(3)	0	125
Toms River township	296	111	665	0	(72)	1,000
Tuckerton borough	0	0	14	0	0	14
Ocean County Total	1,589	1,152	3,531	(259)	(370)	5,643

TABLE A.4: OCEAN COUNTY INITIAL SUMMARY OBLIGATIONS

Municipality	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Barnegat township	329	63	7	96	495
Barnegat Light borough	83	12	0	27	122
Bay Head borough	65	1	12	26	104
Beach Haven borough	70	3	27	76	176
Beachwood borough	123	0	0	0	123
Berkeley township	610	0	0	0	610
Brick township	930	262	0	192	1,384
Eagleswood township	36	0	5	31	72
Harvey Cedars borough	44	3	4	18	69
Island Heights borough	31	3	23	25	82
Jackson township	1,247	56	74	333	1,710
Lacey township	580	48	0	35	663
Lakehurst borough	66	0	0	0	66
Lakewood township	0	533	412	55	1,000
Lavallette borough	82	0	33	111	226
Little Egg Harbor township	194	0	0	19	213
Long Beach township	41	16	65	205	327
Manchester township	370	0	0	0	370
Mantoloking borough	60	0	19	1	80
Ocean township	236	6	74	77	393
Ocean Gate borough	12	0	0	0	12
Pine Beach borough	41	0	0	10	51
Plumsted township	47	14	44	47	152
Point Pleasant borough	343	11	80	181	615
Point Pleasant Beach bor.	167	36	64	236	503
Seaside Heights borough	0	79	0	0	79
Seaside Park borough	52	30	19	110	211
Ship Bottom borough	71	0	57	38	166
South Toms River borough	51	0	0	0	51
Stafford township	555	114	0	246	915
Surf City borough	49	3	22	100	174
Toms River township	2,233	296	111	593	3,233
Tuckerton borough	69	0	0	14	83
Ocean County Total	8,887	1,589	1,152	2,902	14,530

APPENDIX B: MUNICIPAL ALLOCATION FACTORS

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Allendale borough	Bergen	13,550	0.65%	0.00%	1.27%	0.75%	0.66%	90
Alpine borough	Bergen	13,550	0.08%	0.58%	1.20%	1.39%	0.81%	110
Bergenfield borough	Bergen	13,550	0.69%	0.62%	1.05%	0.17%	0.63%	86
Bogota borough	Bergen	13,550	0.19%	0.00%	0.52%	0.10%	0.20%	27
Carlstadt borough	Bergen	13,550	2.36%	0.00%	0.35%	0.07%	0.69%	94
Cliffside Park borough	Bergen	13,550	0.45%	0.00%	0.74%	0.14%	0.33%	45
Closter borough	Bergen	13,550	0.53%	0.00%	1.20%	0.66%	0.60%	81
Cresskill borough	Bergen	13,550	0.66%	4.87%	1.08%	0.41%	1.76%	238
Demarest borough	Bergen	13,550	0.13%	0.01%	1.31%	0.42%	0.47%	63
Dumont borough	Bergen	13,550	0.38%	1.33%	0.96%	0.08%	0.69%	93
East Rutherford borough	Bergen	13,550	1.52%	0.00%	0.46%	0.63%	0.65%	88
Edgewater borough	Bergen	13,550	0.83%	4.23%	1.35%	0.72%	1.78%	242
Elmwood Park borough	Bergen	13,550	1.53%	2.21%	0.52%	0.43%	1.17%	159
Emerson borough	Bergen	13,550	0.40%	0.00%	0.82%	1.43%	0.66%	90
Englewood city	Bergen	13,550	2.72%	0.00%	1.37%	1.24%	1.34%	181
Englewood Cliffs borough	Bergen	13,550	1.60%	2.12%	1.13%	0.94%	1.45%	196
Fair Lawn borough	Bergen	13,550	2.30%	3.08%	1.78%	0.83%	2.00%	271
Fairview borough	Bergen	13,550	0.42%	0.00%	0.15%	0.22%	0.20%	27
Fort Lee borough	Bergen	13,550	2.26%	0.00%	1.57%	0.35%	1.05%	142
Franklin Lakes borough	Bergen	13,550	1.38%	0.00%	2.24%	4.37%	2.00%	271
Garfield city	Bergen	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Glen Rock borough	Bergen	13,550	0.60%	0.00%	2.12%	0.36%	0.77%	104
Hackensack city	Bergen	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Harrington Park borough	Bergen	13,550	0.21%	0.58%	1.17%	1.07%	0.76%	103
Hasbrouck Heights borough	Bergen	13,550	1.19%	6.45%	0.84%	0.23%	2.18%	295
Haworth borough	Bergen	13,550	0.13%	0.00%	1.09%	0.43%	0.41%	56
Hillsdale borough	Bergen	13,550	0.38%	0.00%	1.15%	1.40%	0.73%	99
Ho-Ho-Kus borough	Bergen	13,550	0.18%	0.00%	1.56%	0.60%	0.59%	79
Leonia borough	Bergen	13,550	0.43%	0.92%	0.71%	0.10%	0.54%	73
Little Ferry borough	Bergen	13,550	0.59%	0.00%	0.47%	0.40%	0.37%	50
Lodi borough	Bergen	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lyndhurst township	Bergen	13,550	1.97%	0.00%	0.74%	1.13%	0.96%	130
Mahwah township	Bergen	13,550	2.92%	0.00%	1.92%	2.16%	1.75%	238
Maywood borough	Bergen	13,550	0.56%	0.00%	0.68%	0.39%	0.41%	55
Midland Park borough	Bergen	13,550	0.60%	0.00%	0.65%	0.12%	0.34%	46
Montvale borough	Bergen	13,550	1.93%	2.40%	1.03%	2.37%	1.93%	261
Moonachie borough	Bergen	13,550	1.46%	0.00%	0.12%	0.12%	0.43%	58
New Milford borough	Bergen	13,550	0.39%	1.02%	0.77%	0.11%	0.57%	78
North Arlington borough	Bergen	13,550	0.64%	0.33%	0.68%	0.43%	0.52%	70
Northvale borough	Bergen	13,550	0.64%	0.00%	0.51%	0.24%	0.35%	47

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Norwood borough	Bergen	13,550	0.33%	0.00%	0.73%	0.57%	0.41%	55
Oakland borough	Bergen	13,550	0.95%	0.00%	1.28%	0.45%	0.67%	91
Old Tappan borough	Bergen	13,550	0.39%	3.22%	1.13%	0.98%	1.43%	194
Oradell borough	Bergen	13,550	0.57%	0.00%	1.60%	0.08%	0.56%	76
Palisades Park borough	Bergen	13,550	0.58%	0.00%	0.47%	0.21%	0.31%	43
Paramus borough	Bergen	13,550	7.72%	0.00%	1.68%	2.97%	3.09%	419
Park Ridge borough	Bergen	13,550	0.64%	0.50%	1.02%	0.40%	0.64%	87
Ramsey borough	Bergen	13,550	1.87%	0.00%	1.81%	1.28%	1.24%	168
Ridgefield borough	Bergen	13,550	0.84%	0.00%	0.44%	0.78%	0.51%	70
Ridgefield Park village	Bergen	13,550	0.74%	0.00%	0.43%	0.34%	0.38%	51
Ridgewood village	Bergen	13,550	2.14%	1.12%	3.30%	1.16%	1.93%	262
River Edge borough	Bergen	13,550	0.66%	1.90%	0.99%	0.11%	0.92%	124
River Vale township	Bergen	13,550	0.27%	0.00%	1.43%	0.85%	0.64%	86
Rochelle Park township	Bergen	13,550	0.83%	0.00%	0.41%	0.10%	0.34%	45
Rockleigh borough	Bergen	13,550	0.34%	2.97%	1.31%	0.21%	1.20%	163
Rutherford borough	Bergen	13,550	1.29%	3.21%	1.07%	0.12%	1.42%	193
Saddle Brook township	Bergen	13,550	1.69%	0.00%	0.69%	0.60%	0.74%	101
Saddle River borough	Bergen	13,550	0.17%	1.46%	1.04%	3.58%	1.56%	212
South Hackensack township	Bergen	13,550	0.93%	0.00%	0.28%	0.15%	0.34%	46
Teaneck township	Bergen	13,550	3.15%	14.83%	2.04%	0.38%	5.10%	691
Tenafly borough	Bergen	13,550	0.70%	0.00%	2.24%	0.61%	0.89%	120
Teterboro borough	Bergen	13,550	1.28%	0.95%	0.37%	0.01%	0.65%	88
Upper Saddle River borough	Bergen	13,550	0.85%	2.66%	2.19%	0.85%	1.64%	222
Waldwick borough	Bergen	13,550	0.51%	0.10%	1.03%	0.51%	0.54%	73
Wallington borough	Bergen	13,550	0.41%	0.00%	0.20%	0.20%	0.20%	27
Washington township	Bergen	13,550	0.28%	3.24%	1.22%	0.77%	1.38%	187
Westwood borough	Bergen	13,550	0.70%	0.00%	0.73%	0.51%	0.49%	66
Woodcliff Lake borough	Bergen	13,550	0.92%	2.35%	1.25%	1.76%	1.57%	213
Wood-Ridge borough	Bergen	13,550	0.39%	0.00%	0.75%	0.06%	0.30%	41
Wyckoff township	Bergen	13,550	0.95%	0.00%	2.42%	2.18%	1.39%	188
Bayonne city	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Newark borough	Hudson	13,550	0.04%	0.00%	0.10%	0.07%	0.05%	7
Guttenberg town	Hudson	13,550	0.18%	0.00%	0.29%	0.15%	0.16%	21
Harrison town	Hudson	13,550	0.83%	3.09%	0.20%	0.17%	1.07%	145
Hoboken city	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Jersey City	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kearny town	Hudson	13,550	2.36%	0.00%	0.69%	2.97%	1.51%	204
North Bergen township	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Secaucus town	Hudson	13,550	6.62%	0.00%	1.00%	0.07%	1.92%	260
Union City	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Weehawken township	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
West New York town	Hudson	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Bloomingtondale borough	Passaic	13,550	0.21%	0.00%	0.43%	0.35%	0.25%	34
Clifton city	Passaic	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haledon borough	Passaic	13,550	0.24%	0.00%	0.26%	0.52%	0.25%	34
Hawthorne borough	Passaic	13,550	1.09%	0.00%	0.89%	1.10%	0.77%	104
Little Falls township	Passaic	13,550	1.14%	0.00%	0.59%	1.89%	0.91%	123
North Haledon borough	Passaic	13,550	0.28%	0.30%	0.86%	1.94%	0.84%	114
Passaic city	Passaic	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Paterson city	Passaic	13,550	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pompton Lakes borough	Passaic	13,550	0.36%	0.00%	0.76%	0.46%	0.39%	53
Prospect Park borough	Passaic	13,550	0.10%	0.45%	0.18%	0.62%	0.34%	46
Ringwood borough	Passaic	13,550	0.37%	0.00%	0.99%	0.00%	0.34%	46
Totowa borough	Passaic	13,550	2.28%	0.00%	0.61%	2.39%	1.32%	179
Wanaque borough	Passaic	13,550	0.38%	0.98%	0.73%	0.65%	0.69%	93
Wayne township	Passaic	13,550	6.65%	0.00%	3.07%	10.94%	5.17%	700
West Milford township	Passaic	13,550	0.70%	0.00%	1.39%	0.00%	0.52%	71
Woodland Park borough	Passaic	13,550	0.82%	0.58%	0.62%	2.10%	1.03%	140
Andover borough	Sussex	13,550	0.03%	0.03%	0.37%	0.00%	0.11%	14
Andover township	Sussex	13,550	0.57%	6.02%	0.84%	0.00%	1.86%	252
Branchville borough	Sussex	13,550	0.27%	4.30%	0.23%	0.00%	1.20%	162
Byram township	Sussex	13,550	0.23%	1.57%	0.89%	0.00%	0.67%	91
Frankford township	Sussex	13,550	0.26%	0.00%	0.71%	0.00%	0.24%	33
Franklin borough	Sussex	13,550	0.19%	0.13%	0.23%	2.23%	0.69%	94
Fredon township	Sussex	13,550	0.13%	1.83%	0.73%	0.00%	0.67%	91
Green township	Sussex	13,550	0.06%	0.00%	0.83%	0.46%	0.34%	46
Hamburg borough	Sussex	13,550	0.13%	0.00%	0.26%	1.31%	0.42%	57
Hampton township	Sussex	13,550	0.37%	0.00%	0.49%	0.00%	0.22%	29
Hardyston township	Sussex	13,550	0.46%	3.61%	0.68%	9.34%	3.52%	477
Hopatcong borough	Sussex	13,550	0.22%	0.85%	0.91%	1.09%	0.77%	104
Lafayette township	Sussex	13,550	0.22%	1.46%	0.59%	0.00%	0.57%	77
Montague township	Sussex	13,550	0.12%	1.37%	0.23%	0.00%	0.43%	58
Newton town	Sussex	13,550	0.63%	0.00%	0.12%	0.00%	0.19%	25
Ogdensburg borough	Sussex	13,550	0.03%	0.00%	0.37%	0.04%	0.11%	15
Sandyston township	Sussex	13,550	0.08%	0.64%	0.35%	0.00%	0.27%	36
Sparta township	Sussex	13,550	1.02%	0.00%	1.95%	4.63%	1.90%	257
Stanhope borough	Sussex	13,550	0.23%	0.00%	0.50%	0.15%	0.22%	30
Stillwater township	Sussex	13,550	0.11%	0.81%	0.47%	0.00%	0.35%	47
Sussex borough	Sussex	13,550	0.08%	0.00%	0.00%	0.00%	0.02%	3
Vernon township	Sussex	13,550	0.62%	2.70%	1.00%	4.55%	2.22%	300
Walpack township	Sussex	13,550	0.00%	0.01%	0.00%	0.00%	0.00%	0
Wantage township	Sussex	13,550	0.33%	0.00%	0.78%	0.00%	0.28%	38
Belleville township	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Bloomfield township	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Caldwell borough	Essex	6,600	0.38%	0.00%	0.51%	0.04%	0.23%	15
Cedar Grove township	Essex	6,600	0.88%	0.00%	1.00%	1.56%	0.86%	57
City of Orange township	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Orange city	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Essex Fells borough	Essex	6,600	0.04%	0.05%	1.44%	0.17%	0.43%	28
Fairfield township	Essex	6,600	3.71%	0.00%	0.82%	1.41%	1.48%	98
Glen Ridge borough	Essex	6,600	0.19%	0.07%	1.83%	0.02%	0.53%	35
Irvington township	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Livingston township	Essex	6,600	3.98%	0.00%	2.80%	2.03%	2.20%	145
Maplewood township	Essex	6,600	1.08%	0.35%	1.92%	0.13%	0.87%	57
Millburn township	Essex	6,600	2.85%	6.52%	3.38%	0.47%	3.30%	218
Montclair township	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Newark city	Essex	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Caldwell borough	Essex	6,600	0.19%	0.99%	2.13%	0.42%	0.93%	61
Nutley township	Essex	6,600	1.17%	0.00%	1.18%	0.48%	0.71%	47
Roseland borough	Essex	6,600	1.91%	0.00%	0.98%	0.39%	0.82%	54
S. Orange Village township	Essex	6,600	1.17%	10.50%	1.63%	0.22%	3.38%	223
Verona township	Essex	6,600	0.69%	0.00%	1.20%	0.46%	0.59%	39
West Caldwell township	Essex	6,600	1.57%	1.05%	0.95%	0.51%	1.02%	67
West Orange township	Essex	6,600	2.46%	0.00%	2.15%	5.93%	2.63%	174
Boonton town	Morris	6,600	0.52%	0.00%	0.68%	0.36%	0.39%	26
Boonton township	Morris	6,600	0.14%	0.12%	0.94%	0.99%	0.55%	36
Butler borough	Morris	6,600	0.59%	0.71%	0.58%	0.49%	0.59%	39
Chatham borough	Morris	6,600	0.67%	0.00%	1.70%	0.58%	0.74%	49
Chatham township	Morris	6,600	0.67%	5.84%	1.94%	1.53%	2.50%	165
Chester borough	Morris	6,600	0.32%	1.43%	0.63%	0.28%	0.66%	44
Chester township	Morris	6,600	0.32%	0.00%	1.92%	0.20%	0.61%	40
Denville township	Morris	6,600	1.59%	0.54%	1.40%	1.71%	1.31%	86
Dover town	Morris	6,600	1.01%	0.00%	0.25%	0.28%	0.38%	25
East Hanover township	Morris	6,600	2.90%	0.08%	1.10%	1.35%	1.36%	90
Florham Park borough	Morris	6,600	3.54%	16.57%	1.24%	4.97%	6.58%	434
Hanover township	Morris	6,600	2.78%	0.00%	1.19%	3.69%	1.92%	126
Harding township	Morris	6,600	0.33%	2.15%	1.78%	0.68%	1.24%	82
Jefferson township	Morris	6,600	0.69%	2.84%	1.14%	0.05%	1.18%	78
Kinnelon borough	Morris	6,600	0.27%	1.21%	1.46%	0.00%	0.74%	49
Lincoln Park borough	Morris	6,600	0.57%	0.46%	0.63%	3.18%	1.21%	80
Long Hill township	Morris	6,600	0.49%	0.00%	1.05%	0.02%	0.39%	26
Madison borough	Morris	6,600	0.84%	0.00%	1.62%	0.79%	0.81%	54
Mendham borough	Morris	6,600	0.28%	0.00%	1.09%	1.11%	0.62%	41
Mendham township	Morris	6,600	0.17%	0.86%	1.85%	0.77%	0.92%	60
Mine Hill township	Morris	6,600	0.11%	0.72%	0.57%	0.87%	0.57%	37
Montville township	Morris	6,600	1.63%	0.00%	1.90%	1.62%	1.29%	85

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Develop- able Land Share	Averaged Share	Municipal Allocation
Morris township	Morris	6,600	2.36%	8.26%	2.45%	4.95%	4.50%	297
Morris Plains borough	Morris	6,600	0.63%	0.00%	0.89%	0.57%	0.52%	35
Morristown town	Morris	6,600	3.22%	0.00%	0.77%	0.75%	1.18%	78
Mountain Lakes borough	Morris	6,600	0.41%	0.00%	1.60%	0.11%	0.53%	35
Mount Arlington borough	Morris	6,600	0.28%	1.19%	0.54%	0.20%	0.55%	37
Mount Olive township	Morris	6,600	1.96%	5.64%	1.27%	3.51%	3.10%	204
Netcong borough	Morris	6,600	0.27%	0.00%	0.10%	0.16%	0.13%	9
Parsippany-Troy Hills twp	Morris	6,600	9.64%	0.00%	2.06%	6.17%	4.47%	295
Pequannock township	Morris	6,600	0.88%	0.00%	0.92%	1.09%	0.72%	48
Randolph township	Morris	6,600	1.38%	1.17%	2.30%	1.84%	1.67%	110
Riverdale borough	Morris	6,600	0.62%	2.47%	0.52%	1.32%	1.23%	81
Rockaway borough	Morris	6,600	0.69%	1.56%	0.50%	0.24%	0.75%	49
Rockaway township	Morris	6,600	1.79%	2.90%	1.54%	2.43%	2.17%	143
Roxbury township	Morris	6,600	1.37%	0.00%	1.37%	2.95%	1.42%	94
Victory Gardens borough	Morris	6,600	0.03%	0.00%	0.05%	0.06%	0.04%	2
Washington township	Morris	6,600	0.66%	1.16%	1.75%	0.19%	0.94%	62
Wharton borough	Morris	6,600	0.48%	1.92%	0.37%	0.42%	0.80%	53
Berkeley Heights township	Union	6,600	1.37%	5.89%	1.76%	1.71%	2.68%	177
Clark township	Union	6,600	1.48%	0.00%	1.00%	0.86%	0.83%	55
Cranford township	Union	6,600	2.36%	0.00%	1.71%	0.37%	1.11%	73
Elizabeth city	Union	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Fanwood borough	Union	6,600	0.19%	0.00%	1.12%	0.22%	0.38%	25
Garwood borough	Union	6,600	0.38%	0.00%	0.49%	0.04%	0.23%	15
Hillside township	Union	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kenilworth borough	Union	6,600	1.27%	0.00%	0.65%	0.35%	0.57%	38
Linden city	Union	6,600	2.99%	0.00%	0.61%	5.39%	2.25%	148
Mountainside borough	Union	6,600	0.94%	0.00%	1.33%	0.48%	0.69%	45
New Providence borough	Union	6,600	1.47%	0.00%	1.55%	0.64%	0.91%	60
Plainfield city	Union	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Rahway city	Union	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle borough	Union	6,600	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle Park borough	Union	6,600	0.34%	0.00%	0.35%	0.13%	0.21%	14
Scotch Plains township	Union	6,600	0.96%	0.00%	1.86%	1.40%	1.05%	70
Springfield township	Union	6,600	1.75%	0.00%	1.08%	0.26%	0.77%	51
Summit city	Union	6,600	2.80%	2.82%	2.77%	0.67%	2.27%	150
Union township	Union	6,600	5.21%	0.00%	1.51%	0.93%	1.91%	126
Westfield town	Union	6,600	1.68%	0.00%	3.13%	0.63%	1.36%	90
Winfield township	Union	6,600	0.02%	0.08%	0.14%	0.67%	0.23%	15
Allamuchy township	Warren	6,600	0.16%	1.31%	0.54%	1.17%	0.80%	53
Alpha borough	Warren	6,600	0.15%	0.65%	0.15%	0.28%	0.31%	20
Belvidere town	Warren	6,600	0.10%	0.00%	0.19%	1.40%	0.42%	28
Blairstown township	Warren	6,600	0.26%	0.00%	0.53%	0.00%	0.20%	13

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Franklin township	Warren	6,600	0.12%	0.46%	0.63%	0.10%	0.33%	22
Frelinghuysen township	Warren	6,600	0.06%	0.42%	0.61%	3.03%	1.03%	68
Greenwich township	Warren	6,600	0.17%	0.86%	0.87%	1.79%	0.92%	61
Hackettstown town	Warren	6,600	1.00%	0.00%	0.40%	0.74%	0.54%	35
Hardwick township	Warren	6,600	0.04%	0.25%	0.62%	0.00%	0.23%	15
Harmony township	Warren	6,600	0.10%	0.12%	0.42%	0.20%	0.21%	14
Hope township	Warren	6,600	0.08%	0.25%	0.51%	0.00%	0.21%	14
Independence township	Warren	6,600	0.14%	0.04%	0.47%	0.28%	0.23%	15
Knowlton township	Warren	6,600	0.07%	0.00%	0.47%	0.00%	0.14%	9
Liberty township	Warren	6,600	0.06%	0.55%	0.51%	0.00%	0.28%	18
Lopatcong township	Warren	6,600	0.34%	0.00%	0.49%	0.48%	0.33%	22
Mansfield township	Warren	6,600	0.28%	2.35%	0.35%	1.03%	1.00%	66
Oxford township	Warren	6,600	0.18%	0.98%	0.27%	0.53%	0.49%	32
Phillipsburg town	Warren	6,600	0.90%	0.00%	0.01%	0.52%	0.36%	24
Pohatcong township	Warren	6,600	0.43%	1.84%	0.36%	0.72%	0.84%	55
Washington borough	Warren	6,600	0.27%	0.00%	0.20%	0.41%	0.22%	15
Washington township	Warren	6,600	0.28%	1.79%	0.62%	1.90%	1.15%	76
White township	Warren	6,600	0.20%	0.00%	0.14%	3.94%	1.07%	71
Alexandria township	Hunterdon	11,770	0.15%	0.10%	1.58%	0.13%	0.49%	58
Bethlehem township	Hunterdon	11,770	0.10%	0.55%	1.49%	0.00%	0.54%	63
Bloomsbury borough	Hunterdon	11,770	0.18%	1.82%	0.68%	0.00%	0.67%	79
Califon borough	Hunterdon	11,770	0.05%	0.18%	1.17%	0.00%	0.35%	41
Clinton town	Hunterdon	11,770	0.27%	0.00%	0.87%	0.29%	0.36%	42
Clinton township	Hunterdon	11,770	1.01%	1.70%	2.01%	1.19%	1.48%	174
Delaware township	Hunterdon	11,770	0.10%	0.03%	1.33%	0.00%	0.37%	43
East Amwell township	Hunterdon	11,770	0.14%	0.38%	1.09%	0.00%	0.40%	47
Flemington borough	Hunterdon	11,770	0.73%	0.07%	0.00%	0.05%	0.21%	25
Franklin township	Hunterdon	11,770	0.14%	0.00%	0.74%	0.00%	0.22%	26
Frenchtown borough	Hunterdon	11,770	0.09%	0.45%	0.34%	0.00%	0.22%	26
Glen Gardner borough	Hunterdon	11,770	0.02%	0.00%	0.39%	0.00%	0.10%	12
Hampton borough	Hunterdon	11,770	0.05%	0.28%	0.31%	0.03%	0.17%	20
High Bridge borough	Hunterdon	11,770	0.16%	0.36%	0.86%	0.15%	0.38%	45
Holland township	Hunterdon	11,770	0.11%	0.00%	0.94%	0.03%	0.27%	32
Kingwood township	Hunterdon	11,770	0.13%	0.22%	1.09%	0.00%	0.36%	42
Lambertville city	Hunterdon	11,770	0.24%	0.17%	0.65%	0.00%	0.26%	31
Lebanon borough	Hunterdon	11,770	0.20%	0.93%	0.62%	0.15%	0.48%	56
Lebanon township	Hunterdon	11,770	0.16%	0.00%	1.33%	0.00%	0.37%	44
Milford borough	Hunterdon	11,770	0.06%	0.00%	0.51%	0.24%	0.20%	24
Raritan township	Hunterdon	11,770	2.06%	2.85%	2.46%	3.24%	2.65%	312
Readington township	Hunterdon	11,770	1.81%	7.71%	2.47%	7.96%	4.99%	587
Stockton borough	Hunterdon	11,770	0.03%	0.11%	0.54%	0.00%	0.17%	20
Tewksbury township	Hunterdon	11,770	0.32%	0.34%	2.89%	0.09%	0.91%	107

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Union township	Hunterdon	11,770	0.30%	0.00%	1.26%	0.09%	0.41%	49
West Amwell township	Hunterdon	11,770	0.13%	0.00%	1.00%	0.00%	0.28%	33
Carteret borough	Middlesex	11,770	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cranbury township	Middlesex	11,770	1.26%	0.00%	1.95%	1.99%	1.30%	153
Dunellen borough	Middlesex	11,770	0.15%	0.00%	0.55%	0.02%	0.18%	21
East Brunswick township	Middlesex	11,770	4.31%	1.12%	2.88%	3.35%	2.91%	343
Edison township	Middlesex	11,770	12.56%	0.00%	4.57%	4.23%	5.34%	628
Helmetta borough	Middlesex	11,770	0.03%	0.02%	0.50%	0.07%	0.16%	18
Highland Park borough	Middlesex	11,770	0.44%	0.00%	0.81%	0.12%	0.34%	40
Jamesburg borough	Middlesex	11,770	0.41%	1.96%	0.09%	0.27%	0.68%	80
Metuchen borough	Middlesex	11,770	1.04%	1.96%	1.63%	0.09%	1.18%	139
Middlesex borough	Middlesex	11,770	0.89%	0.00%	0.80%	0.24%	0.48%	57
Milltown borough	Middlesex	11,770	0.33%	0.00%	0.96%	0.11%	0.35%	41
Monroe township	Middlesex	11,770	1.90%	9.11%	1.92%	11.08%	6.00%	707
New Brunswick city	Middlesex	11,770	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Brunswick township	Middlesex	11,770	3.81%	2.37%	1.61%	1.97%	2.44%	287
Old Bridge township	Middlesex	11,770	2.05%	0.83%	2.63%	6.86%	3.09%	364
Perth Amboy city	Middlesex	11,770	0.00%	0.00%	0.00%	0.00%	0.00%	0
Piscataway township	Middlesex	11,770	6.55%	0.00%	2.25%	2.42%	2.80%	330
Plainsboro township	Middlesex	11,770	2.75%	2.80%	1.96%	3.87%	2.84%	335
Sayreville borough	Middlesex	11,770	1.67%	1.66%	1.46%	2.17%	1.74%	205
South Amboy city	Middlesex	11,770	0.33%	0.03%	0.60%	0.46%	0.35%	42
South Brunswick township	Middlesex	11,770	4.41%	0.00%	3.18%	9.99%	4.39%	517
South Plainfield borough	Middlesex	11,770	3.82%	3.42%	1.35%	0.53%	2.28%	269
South River borough	Middlesex	11,770	0.42%	0.00%	0.40%	0.24%	0.27%	31
Spotswood borough	Middlesex	11,770	0.38%	0.00%	0.58%	0.23%	0.30%	35
Woodbridge township	Middlesex	11,770	9.58%	3.93%	2.40%	2.70%	4.65%	548
Bedminster township	Somerset	11,770	1.74%	0.84%	1.33%	0.42%	1.08%	127
Bernards township	Somerset	11,770	2.86%	17.47%	4.15%	2.07%	6.64%	781
Bernardsville borough	Somerset	11,770	0.48%	0.00%	1.71%	0.56%	0.69%	81
Bound Brook borough	Somerset	11,770	0.41%	0.00%	0.31%	0.06%	0.19%	23
Branchburg township	Somerset	11,770	2.23%	4.93%	2.22%	2.82%	3.05%	359
Bridgewater township	Somerset	11,770	6.26%	0.00%	3.75%	4.00%	3.50%	412
Far Hills borough	Somerset	11,770	0.05%	0.00%	1.05%	0.21%	0.32%	38
Franklin township	Somerset	11,770	5.84%	8.20%	2.90%	5.44%	5.59%	658
Green Brook township	Somerset	11,770	0.61%	2.41%	1.70%	0.65%	1.34%	158
Hillsborough township	Somerset	11,770	1.95%	9.23%	3.21%	8.71%	5.78%	680
Manville borough	Somerset	11,770	0.33%	0.00%	0.27%	0.04%	0.16%	19
Millstone borough	Somerset	11,770	0.02%	0.22%	0.50%	0.08%	0.21%	24
Montgomery township	Somerset	11,770	2.22%	4.54%	3.85%	2.59%	3.30%	388
North Plainfield borough	Somerset	11,770	0.53%	0.19%	0.42%	0.04%	0.29%	35
Peapack & Gladstone bor.	Somerset	11,770	0.52%	3.09%	1.83%	0.43%	1.47%	173

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Raritan borough	Somerset	11,770	1.59%	0.00%	0.57%	0.15%	0.57%	68
Rocky Hill borough	Somerset	11,770	0.06%	0.00%	0.68%	0.06%	0.20%	24
Somerville borough	Somerset	11,770	1.28%	0.00%	0.50%	0.10%	0.47%	55
South Bound Brook borough	Somerset	11,770	0.07%	0.00%	0.42%	0.01%	0.12%	15
Warren township	Somerset	11,770	2.22%	0.19%	3.35%	3.77%	2.38%	280
Watchung borough	Somerset	11,770	0.89%	1.23%	1.59%	1.17%	1.22%	144
East Windsor township	Mercer	11,760	1.54%	2.79%	1.45%	3.28%	2.26%	266
Ewing township	Mercer	11,760	6.55%	16.46%	1.35%	1.23%	6.40%	752
Hamilton township	Mercer	11,760	6.93%	11.25%	2.80%	3.90%	6.22%	731
Hightstown borough	Mercer	11,760	0.49%	0.00%	0.61%	0.06%	0.29%	34
Hopewell borough	Mercer	11,760	0.13%	0.00%	0.75%	0.00%	0.22%	26
Hopewell township	Mercer	11,760	2.44%	12.56%	2.49%	5.09%	5.64%	664
Lawrence township	Mercer	11,760	3.91%	1.56%	1.81%	1.87%	2.29%	269
Pennington borough	Mercer	11,760	0.39%	0.00%	0.97%	0.03%	0.35%	41
Princeton	Mercer	11,760	5.64%	5.97%	2.69%	1.91%	4.05%	477
Robbinsville township	Mercer	11,760	1.33%	2.98%	1.55%	2.46%	2.08%	245
Trenton city	Mercer	11,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
West Windsor township	Mercer	11,760	4.83%	0.00%	3.20%	4.24%	3.07%	361
Aberdeen township	Monmouth	11,760	0.72%	0.43%	1.17%	0.44%	0.69%	81
Allenhurst borough	Monmouth	11,760	0.06%	0.00%	0.55%	0.01%	0.15%	18
Allentown borough	Monmouth	11,760	0.12%	0.00%	0.79%	0.00%	0.23%	27
Asbury Park city	Monmouth	11,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Atlantic Highlands borough	Monmouth	11,760	0.19%	0.00%	0.76%	0.08%	0.26%	30
Avon-by-the-Sea borough	Monmouth	11,760	0.07%	0.00%	0.48%	0.01%	0.14%	16
Belmar borough	Monmouth	11,760	0.21%	0.04%	0.45%	0.06%	0.19%	22
Bradley Beach borough	Monmouth	11,760	0.13%	0.13%	0.50%	0.03%	0.20%	23
Brielle borough	Monmouth	11,760	0.26%	0.35%	1.05%	0.21%	0.47%	55
Colts Neck township	Monmouth	11,760	0.48%	0.30%	1.79%	0.00%	0.64%	75
Deal borough	Monmouth	11,760	0.07%	0.00%	0.57%	0.12%	0.19%	22
Eatontown borough	Monmouth	11,760	2.36%	1.05%	0.68%	0.50%	1.15%	135
Englishtown borough	Monmouth	11,760	0.13%	0.00%	0.60%	0.03%	0.19%	22
Fair Haven borough	Monmouth	11,760	0.15%	0.00%	1.52%	0.03%	0.42%	50
Farmingdale borough	Monmouth	11,760	0.11%	0.00%	0.30%	0.04%	0.11%	13
Freehold borough	Monmouth	11,760	0.84%	0.00%	0.44%	0.17%	0.36%	43
Freehold township	Monmouth	11,760	4.59%	3.06%	2.18%	3.52%	3.34%	393
Hazlet township	Monmouth	11,760	1.19%	0.00%	1.17%	0.37%	0.68%	80
Highlands borough	Monmouth	11,760	0.13%	0.00%	0.56%	0.07%	0.19%	22
Holmdel township	Monmouth	11,760	1.50%	0.00%	2.14%	0.41%	1.01%	119
Howell township	Monmouth	11,760	2.75%	3.88%	2.39%	1.74%	2.69%	316
Interlaken borough	Monmouth	11,760	0.01%	0.00%	1.01%	0.00%	0.26%	30
Keansburg borough	Monmouth	11,760	0.31%	0.49%	0.28%	0.08%	0.29%	34
Keyport borough	Monmouth	11,760	0.36%	0.00%	0.41%	0.06%	0.21%	25

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Lake Como borough	Monmouth	11,760	0.06%	0.00%	0.34%	0.02%	0.10%	12
Little Silver borough	Monmouth	11,760	0.42%	0.00%	1.42%	0.12%	0.49%	58
Loch Arbour village	Monmouth	11,760	0.00%	0.00%	0.81%	0.01%	0.21%	24
Long Branch city	Monmouth	11,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Manalapan township	Monmouth	11,760	1.71%	0.21%	2.55%	2.39%	1.71%	202
Manasquan borough	Monmouth	11,760	0.31%	0.00%	0.82%	0.05%	0.29%	34
Marlboro township	Monmouth	11,760	2.03%	3.13%	3.38%	3.81%	3.09%	363
Matawan borough	Monmouth	11,760	0.55%	0.00%	0.91%	0.04%	0.37%	44
Middletown township	Monmouth	11,760	3.90%	1.69%	3.74%	2.74%	3.02%	355
Millstone township	Monmouth	11,760	0.39%	0.97%	1.63%	0.00%	0.75%	88
Monmouth Beach borough	Monmouth	11,760	0.07%	0.00%	0.75%	0.09%	0.23%	27
Neptune township	Monmouth	11,760	2.67%	1.15%	1.05%	0.05%	1.23%	145
Neptune City borough	Monmouth	11,760	0.47%	1.40%	0.52%	0.03%	0.61%	71
Ocean township	Monmouth	11,760	1.80%	0.18%	1.49%	1.22%	1.17%	138
Oceanport borough	Monmouth	11,760	0.76%	1.42%	0.90%	0.15%	0.81%	95
Red Bank borough	Monmouth	11,760	2.20%	0.00%	0.66%	0.16%	0.76%	89
Roosevelt borough	Monmouth	11,760	0.02%	0.00%	0.49%	0.00%	0.13%	15
Rumson borough	Monmouth	11,760	0.34%	0.47%	1.61%	0.23%	0.66%	78
Sea Bright borough	Monmouth	11,760	0.08%	0.00%	0.61%	0.00%	0.17%	20
Sea Girt borough	Monmouth	11,760	0.16%	0.55%	0.93%	0.02%	0.41%	49
Shrewsbury borough	Monmouth	11,760	1.14%	0.06%	1.03%	0.04%	0.57%	66
Shrewsbury township	Monmouth	11,760	0.14%	0.84%	0.24%	0.00%	0.30%	36
Spring Lake borough	Monmouth	11,760	0.18%	0.00%	1.05%	0.04%	0.32%	37
Spring Lake Heights bor.	Monmouth	11,760	0.19%	0.00%	0.53%	0.03%	0.19%	22
Tinton Falls borough	Monmouth	11,760	2.20%	4.46%	1.06%	1.66%	2.35%	276
Union Beach borough	Monmouth	11,760	0.20%	0.51%	0.59%	0.14%	0.36%	42
Upper Freehold township	Monmouth	11,760	0.35%	0.18%	1.27%	0.00%	0.45%	53
Wall township	Monmouth	11,760	3.36%	1.47%	1.81%	6.36%	3.25%	382
West Long Branch borough	Monmouth	11,760	1.04%	0.00%	0.80%	0.18%	0.51%	59
Barnegat township	Ocean	11,760	0.50%	0.96%	0.77%	3.95%	1.54%	181
Barnegat Light borough	Ocean	11,760	0.03%	0.09%	0.50%	0.00%	0.16%	18
Bay Head borough	Ocean	11,760	0.04%	0.00%	0.57%	0.02%	0.16%	19
Beach Haven borough	Ocean	11,760	0.12%	0.21%	0.50%	0.00%	0.21%	24
Beachwood borough	Ocean	11,760	0.17%	0.00%	0.79%	0.11%	0.27%	31
Berkeley township	Ocean	11,760	0.99%	1.18%	0.87%	4.58%	1.90%	224
Brick township	Ocean	11,760	3.96%	5.92%	2.45%	1.63%	3.49%	410
Eagleswood township	Ocean	11,760	0.11%	0.25%	0.42%	1.65%	0.61%	71
Harvey Cedars borough	Ocean	11,760	0.02%	0.00%	0.60%	0.00%	0.15%	18
Island Heights borough	Ocean	11,760	0.06%	0.04%	0.53%	0.06%	0.17%	20
Jackson township	Ocean	11,760	2.07%	3.28%	2.45%	10.94%	4.68%	551
Lacey township	Ocean	11,760	1.09%	1.13%	1.14%	1.94%	1.32%	156
Lakehurst borough	Ocean	11,760	0.11%	0.00%	0.35%	0.03%	0.12%	14

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Lakewood township	Ocean	11,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lavallette borough	Ocean	11,760	0.06%	0.00%	0.43%	0.00%	0.12%	15
Little Egg Harbor township	Ocean	11,760	0.45%	0.00%	0.69%	5.30%	1.61%	189
Long Beach township	Ocean	11,760	0.18%	0.15%	0.68%	0.00%	0.25%	30
Manchester township	Ocean	11,760	0.99%	1.61%	0.65%	7.51%	2.69%	316
Mantoloking borough	Ocean	11,760	0.00%	0.00%	1.10%	0.00%	0.28%	32
Ocean township	Ocean	11,760	0.25%	0.54%	0.68%	2.67%	1.03%	122
Ocean Gate borough	Ocean	11,760	0.02%	0.00%	0.37%	0.02%	0.10%	12
Pine Beach borough	Ocean	11,760	0.05%	0.03%	0.63%	0.01%	0.18%	21
Plumsted township	Ocean	11,760	0.25%	0.45%	0.64%	0.01%	0.34%	40
Point Pleasant borough	Ocean	11,760	0.75%	0.00%	1.10%	0.23%	0.52%	61
Point Pleasant Beach bor.	Ocean	11,760	0.59%	0.74%	0.54%	0.24%	0.53%	62
Seaside Heights borough	Ocean	11,760	0.10%	0.00%	0.00%	0.00%	0.02%	3
Seaside Park borough	Ocean	11,760	0.03%	0.00%	0.28%	0.00%	0.08%	9
Ship Bottom borough	Ocean	11,760	0.09%	0.00%	0.32%	0.00%	0.10%	12
South Toms River borough	Ocean	11,760	0.08%	0.00%	0.39%	0.09%	0.14%	16
Stafford township	Ocean	11,760	1.56%	0.62%	1.13%	2.11%	1.35%	159
Surf City borough	Ocean	11,760	0.09%	0.12%	0.39%	0.00%	0.15%	18
Toms River township	Ocean	11,760	7.35%	0.07%	3.20%	4.64%	3.81%	449
Tuckerton borough	Ocean	11,760	0.20%	0.63%	0.36%	0.62%	0.45%	53
Bass River township	Burlington	12,710	0.04%	0.00%	0.38%	0.00%	0.11%	13
Beverly city	Burlington	12,710	0.06%	0.00%	0.27%	0.04%	0.09%	12
Bordentown city	Burlington	12,710	0.27%	0.00%	0.60%	0.03%	0.23%	29
Bordentown township	Burlington	12,710	0.82%	0.00%	1.29%	1.79%	0.97%	124
Burlington city	Burlington	12,710	0.89%	0.00%	0.38%	0.15%	0.35%	45
Burlington township	Burlington	12,710	2.96%	3.38%	1.58%	3.78%	2.93%	372
Chesterfield township	Burlington	12,710	0.27%	0.00%	1.58%	0.00%	0.46%	59
Cinnaminson township	Burlington	12,710	1.79%	0.00%	1.76%	0.80%	1.08%	138
Delanco township	Burlington	12,710	0.24%	0.00%	0.72%	0.76%	0.43%	54
Delran township	Burlington	12,710	1.32%	4.10%	1.48%	0.78%	1.92%	244
Eastampton township	Burlington	12,710	0.58%	3.58%	0.65%	0.30%	1.28%	162
Edgewater Park township	Burlington	12,710	0.51%	2.11%	0.51%	0.72%	0.96%	122
Evesham township	Burlington	12,710	5.91%	11.05%	3.60%	1.68%	5.56%	707
Fieldsboro borough	Burlington	12,710	0.01%	0.00%	0.44%	0.04%	0.12%	15
Florence township	Burlington	12,710	0.61%	0.72%	1.15%	1.17%	0.91%	116
Hainesport township	Burlington	12,710	0.82%	1.59%	1.02%	0.99%	1.11%	140
Lumberton township	Burlington	12,710	1.24%	5.69%	1.36%	1.13%	2.36%	299
Mansfield township	Burlington	12,710	0.49%	1.49%	1.18%	1.82%	1.24%	158
Maple Shade township	Burlington	12,710	1.29%	1.35%	0.71%	0.16%	0.88%	112
Medford township	Burlington	12,710	1.89%	0.55%	2.89%	2.11%	1.86%	237
Medford Lakes borough	Burlington	12,710	0.07%	0.00%	1.35%	0.01%	0.36%	45
Moorestown township	Burlington	12,710	6.16%	2.49%	3.61%	1.46%	3.43%	436

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Mount Holly township	Burlington	12,710	1.49%	0.00%	0.64%	0.31%	0.61%	78
Mount Laurel township	Burlington	12,710	8.34%	5.04%	3.54%	3.19%	5.03%	639
New Hanover township	Burlington	12,710	0.46%	2.45%	0.78%	0.00%	0.92%	117
North Hanover township	Burlington	12,710	0.22%	0.00%	0.50%	0.00%	0.18%	23
Palmyra borough	Burlington	12,710	0.39%	0.00%	0.62%	0.48%	0.37%	48
Pemberton borough	Burlington	12,710	0.04%	0.00%	0.44%	0.00%	0.12%	15
Pemberton township	Burlington	12,710	1.39%	0.00%	0.93%	0.92%	0.81%	103
Riverside township	Burlington	12,710	0.19%	0.00%	0.42%	0.11%	0.18%	23
Riverton borough	Burlington	12,710	0.13%	0.27%	0.99%	0.02%	0.35%	45
Shamong township	Burlington	12,710	0.19%	0.09%	1.31%	0.12%	0.43%	54
Southampton township	Burlington	12,710	0.54%	0.00%	0.60%	0.18%	0.33%	42
Springfield township	Burlington	12,710	0.30%	1.37%	1.05%	0.00%	0.68%	87
Tabernacle township	Burlington	12,710	0.25%	0.37%	1.25%	0.38%	0.56%	71
Washington township	Burlington	12,710	0.03%	0.00%	0.53%	0.00%	0.14%	18
Westampton township	Burlington	12,710	1.32%	2.20%	1.47%	3.46%	2.11%	268
Willingboro township	Burlington	12,710	1.46%	0.00%	1.29%	0.62%	0.84%	107
Woodland township	Burlington	12,710	0.26%	1.25%	0.70%	0.00%	0.55%	70
Wrightstown borough	Burlington	12,710	0.18%	0.85%	0.00%	0.00%	0.26%	33
Audubon borough	Camden	12,710	0.43%	0.00%	0.89%	0.02%	0.34%	43
Audubon Park borough	Camden	12,710	0.07%	0.36%	0.12%	0.00%	0.14%	17
Barrington borough	Camden	12,710	0.32%	0.00%	0.64%	0.07%	0.26%	33
Bellmawr borough	Camden	12,710	0.88%	0.00%	0.40%	0.27%	0.39%	49
Berlin borough	Camden	12,710	0.90%	0.00%	0.98%	0.79%	0.67%	85
Berlin township	Camden	12,710	1.04%	1.42%	0.53%	1.11%	1.03%	130
Brooklawn borough	Camden	12,710	0.12%	0.43%	0.32%	0.02%	0.23%	29
Camden city	Camden	12,710	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cherry Hill township	Camden	12,710	12.48%	11.28%	5.46%	1.44%	7.66%	974
Chesilhurst borough	Camden	12,710	0.04%	0.12%	0.35%	0.26%	0.19%	25
Clementon borough	Camden	12,710	0.28%	0.73%	0.10%	0.14%	0.31%	40
Collingswood borough	Camden	12,710	0.80%	0.00%	0.72%	0.02%	0.39%	49
Gibbsboro borough	Camden	12,710	0.32%	0.00%	0.76%	0.51%	0.40%	50
Gloucester township	Camden	12,710	3.51%	5.40%	2.67%	4.73%	4.08%	518
Gloucester City	Camden	12,710	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haddon township	Camden	12,710	0.54%	0.81%	1.27%	0.09%	0.68%	86
Haddonfield borough	Camden	12,710	1.06%	0.59%	2.45%	0.07%	1.04%	133
Haddon Heights borough	Camden	12,710	0.44%	0.03%	1.21%	0.01%	0.42%	54
Hi-Nella borough	Camden	12,710	0.01%	0.00%	0.06%	0.03%	0.03%	3
Laurel Springs borough	Camden	12,710	0.05%	0.02%	0.83%	0.02%	0.23%	29
Lawnside borough	Camden	12,710	0.53%	0.00%	0.31%	0.43%	0.32%	40
Lindenwold borough	Camden	12,710	0.00%	0.00%	0.00%	0.00%	0.00%	0
Magnolia borough	Camden	12,710	0.20%	0.34%	0.35%	0.06%	0.24%	30
Merchantville borough	Camden	12,710	0.14%	0.00%	0.40%	0.01%	0.14%	18



Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Mount Ephraim borough	Camden	12,710	0.19%	0.00%	0.57%	0.04%	0.20%	26
Oaklyn borough	Camden	12,710	0.28%	0.94%	0.52%	0.01%	0.44%	55
Pennsauken township	Camden	12,710	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pine Hill borough	Camden	12,710	0.30%	0.00%	0.44%	0.99%	0.43%	55
Pine Valley borough	Camden	12,710	0.00%	0.00%	0.00%	0.73%	0.18%	23
Runnemede borough	Camden	12,710	0.57%	0.09%	0.41%	0.21%	0.32%	41
Somerdale borough	Camden	12,710	0.38%	0.40%	0.28%	0.08%	0.29%	36
Stratford borough	Camden	12,710	0.42%	0.00%	0.61%	0.04%	0.27%	34
Tavistock borough	Camden	12,710	0.03%	0.25%	0.00%	0.00%	0.07%	9
Voorhees township	Camden	12,710	4.02%	1.78%	2.57%	1.79%	2.54%	323
Waterford township	Camden	12,710	0.38%	0.00%	0.86%	0.67%	0.48%	61
Winslow township	Camden	12,710	1.54%	1.39%	1.84%	5.75%	2.63%	335
Woodlynne borough	Camden	12,710	0.04%	0.00%	0.04%	0.02%	0.03%	3
Clayton borough	Gloucester	12,710	0.27%	0.16%	0.54%	1.24%	0.55%	70
Deptford township	Gloucester	12,710	3.14%	0.00%	1.42%	5.75%	2.58%	328
East Greenwich township	Gloucester	12,710	0.40%	0.41%	1.66%	3.33%	1.45%	184
Elk township	Gloucester	12,710	0.15%	0.00%	0.78%	4.03%	1.24%	158
Franklin township	Gloucester	12,710	0.78%	0.10%	1.27%	3.60%	1.43%	182
Glassboro borough	Gloucester	12,710	1.93%	3.30%	0.77%	1.88%	1.97%	250
Greenwich township	Gloucester	12,710	0.36%	0.26%	0.57%	1.19%	0.60%	76
Harrison township	Gloucester	12,710	0.61%	1.79%	2.23%	3.76%	2.10%	267
Logan township	Gloucester	12,710	2.01%	5.65%	0.93%	4.01%	3.15%	400
Mantua township	Gloucester	12,710	0.98%	1.92%	1.32%	2.89%	1.78%	226
Monroe township	Gloucester	12,710	1.46%	0.42%	1.66%	5.24%	2.19%	279
National Park borough	Gloucester	12,710	0.05%	0.00%	0.43%	0.06%	0.14%	17
Newfield borough	Gloucester	12,710	0.04%	0.00%	0.40%	0.00%	0.11%	14
Paulsboro borough	Gloucester	12,710	0.38%	1.21%	0.06%	0.17%	0.45%	58
Pitman borough	Gloucester	12,710	0.44%	0.00%	0.82%	0.07%	0.33%	42
South Harrison township	Gloucester	12,710	0.12%	0.04%	1.33%	0.01%	0.37%	48
Swedesboro borough	Gloucester	12,710	0.23%	0.46%	0.54%	0.08%	0.33%	42
Washington township	Gloucester	12,710	3.38%	3.61%	2.94%	4.22%	3.54%	449
Wenonah borough	Gloucester	12,710	0.06%	0.05%	1.10%	0.04%	0.31%	40
West Deptford township	Gloucester	12,710	2.49%	0.00%	1.20%	3.75%	1.86%	236
Westville borough	Gloucester	12,710	0.34%	0.00%	0.31%	0.06%	0.18%	23
Woodbury city	Gloucester	12,710	1.87%	1.94%	0.51%	0.24%	1.14%	145
Woodbury Heights borough	Gloucester	12,710	0.31%	0.29%	0.85%	0.19%	0.41%	52
Woolwich township	Gloucester	12,710	0.45%	0.00%	1.82%	4.27%	1.64%	208
Absecon city	Atlantic	3,760	1.81%	0.00%	1.73%	0.85%	1.10%	41
Atlantic City	Atlantic	3,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Brigantine city	Atlantic	3,760	1.05%	0.00%	2.36%	0.00%	0.85%	32
Buena borough	Atlantic	3,760	0.44%	0.00%	0.86%	0.20%	0.38%	14
Buena Vista township	Atlantic	3,760	1.21%	0.06%	1.07%	0.19%	0.63%	24

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Developable Land Share	Averaged Share	Municipal Allocation
Corbin City	Atlantic	3,760	0.04%	0.00%	0.95%	0.00%	0.25%	9
Egg Harbor township	Atlantic	3,760	9.99%	17.92%	6.45%	10.74%	11.28%	424
Egg Harbor City	Atlantic	3,760	1.02%	0.00%	0.56%	0.36%	0.48%	18
Estell Manor city	Atlantic	3,760	0.14%	0.08%	1.21%	0.00%	0.36%	14
Folsom borough	Atlantic	3,760	0.45%	0.00%	1.03%	0.00%	0.37%	14
Galloway township	Atlantic	3,760	8.03%	17.36%	4.57%	9.60%	9.89%	372
Hamilton township	Atlantic	3,760	7.70%	7.26%	3.26%	5.39%	5.90%	222
Hammonton town	Atlantic	3,760	4.79%	0.00%	2.33%	3.62%	2.69%	101
Linwood city	Atlantic	3,760	2.04%	0.00%	3.07%	0.33%	1.36%	51
Longport borough	Atlantic	3,760	0.06%	0.10%	1.47%	0.03%	0.41%	16
Margate City	Atlantic	3,760	1.11%	1.43%	2.76%	0.07%	1.34%	51
Mullica township	Atlantic	3,760	0.72%	1.80%	1.66%	0.31%	1.12%	42
Northfield city	Atlantic	3,760	2.69%	0.00%	2.07%	0.62%	1.34%	51
Pleasantville city	Atlantic	3,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Port Republic city	Atlantic	3,760	0.09%	0.30%	1.46%	0.01%	0.47%	18
Somers Point city	Atlantic	3,760	4.36%	0.00%	1.31%	0.17%	1.46%	55
Ventnor City	Atlantic	3,760	1.07%	0.00%	2.02%	0.04%	0.78%	29
Weymouth township	Atlantic	3,760	0.17%	0.20%	0.91%	0.00%	0.32%	12
Avalon borough	Cape May	3,760	0.59%	0.47%	2.09%	0.00%	0.79%	30
Cape May city	Cape May	3,760	1.69%	5.88%	0.83%	0.00%	2.10%	79
Cape May Point borough	Cape May	3,760	0.01%	0.00%	0.90%	0.00%	0.23%	9
Dennis township	Cape May	3,760	1.15%	1.63%	1.86%	2.15%	1.70%	64
Lower township	Cape May	3,760	2.90%	0.00%	2.78%	1.20%	1.72%	65
Middle township	Cape May	3,760	6.91%	2.77%	2.86%	3.26%	3.95%	149
North Wildwood city	Cape May	3,760	0.52%	0.11%	0.87%	0.00%	0.37%	14
Ocean City	Cape May	3,760	3.23%	0.00%	2.81%	0.00%	1.51%	57
Sea Isle City	Cape May	3,760	0.47%	0.00%	1.02%	0.00%	0.37%	14
Stone Harbor borough	Cape May	3,760	0.37%	0.00%	1.10%	0.00%	0.37%	14
Upper township	Cape May	3,760	2.31%	0.00%	3.13%	5.07%	2.63%	99
West Cape May borough	Cape May	3,760	0.15%	0.06%	0.55%	0.00%	0.19%	7
West Wildwood borough	Cape May	3,760	0.02%	0.02%	0.54%	0.00%	0.14%	5
Wildwood city	Cape May	3,760	1.51%	0.00%	0.24%	0.00%	0.44%	16
Wildwood Crest borough	Cape May	3,760	0.41%	0.00%	1.54%	0.00%	0.49%	18
Woodbine borough	Cape May	3,760	0.35%	1.60%	0.28%	1.59%	0.96%	36
Bridgeton city	Cumberland	3,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Commercial township	Cumberland	3,760	0.30%	0.00%	0.77%	0.00%	0.27%	10
Deerfield township	Cumberland	3,760	0.98%	3.09%	1.34%	0.00%	1.35%	51
Downe township	Cumberland	3,760	0.14%	0.29%	0.56%	0.00%	0.25%	9
Fairfield township	Cumberland	3,760	1.32%	4.13%	0.73%	4.78%	2.74%	103
Greenwich township	Cumberland	3,760	0.02%	0.00%	1.11%	0.00%	0.28%	11
Hopewell township	Cumberland	3,760	0.83%	0.00%	1.28%	7.15%	2.31%	87
Lawrence township	Cumberland	3,760	0.28%	0.00%	1.35%	0.00%	0.41%	15

Municipality	County	Regional Gap Allocation	Employ Level Share	Employ Change Share	Income Diff Share	Develop- able Land Share	Averaged Share	Municipal Allocation
Maurice River township	Cumberland	3,760	0.58%	2.00%	1.22%	0.00%	0.95%	36
Milville city	Cumberland	3,760	6.64%	0.00%	2.33%	7.17%	4.04%	152
Shiloh borough	Cumberland	3,760	0.02%	0.00%	1.29%	0.00%	0.33%	12
Stow Creek township	Cumberland	3,760	0.11%	0.00%	1.16%	0.00%	0.32%	12
Upper Deerfield township	Cumberland	3,760	2.55%	7.41%	1.33%	6.30%	4.40%	165
Vineland city	Cumberland	3,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Alloway township	Salem	3,760	0.49%	0.51%	1.73%	0.00%	0.68%	26
Cameys Point township	Salem	3,760	2.37%	5.54%	1.22%	9.87%	4.75%	179
Elmer borough	Salem	3,760	0.60%	2.80%	1.00%	0.00%	1.10%	41
Elsinboro township	Salem	3,760	0.06%	0.16%	1.02%	0.00%	0.31%	12
Lower Alloways Creek twp	Salem	3,760	1.94%	6.77%	1.12%	0.00%	2.46%	92
Mannington township	Salem	3,760	1.02%	1.64%	1.08%	0.00%	0.94%	35
Oldmans township	Salem	3,760	0.57%	0.92%	1.32%	12.60%	3.85%	145
Penns Grove borough	Salem	3,760	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pennsville township	Salem	3,760	2.37%	0.00%	2.16%	5.16%	2.42%	91
Pilesgrove township	Salem	3,760	1.28%	5.70%	1.90%	1.15%	2.51%	94
Pittsgrove township	Salem	3,760	1.33%	0.00%	2.43%	0.00%	0.94%	35
Quinton township	Salem	3,760	0.22%	0.00%	1.05%	0.00%	0.32%	12
Salem city	Salem	3,760	1.05%	0.00%	0.00%	0.00%	0.26%	10
Upper Pittsgrove township	Salem	3,760	0.72%	0.00%	1.43%	0.00%	0.54%	20
Woodstown borough	Salem	3,760	0.62%	0.00%	1.51%	0.00%	0.53%	20

APPENDIX C: MUNICIPAL SECONDARY SOURCE ADJUSTMENTS

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Allendale borough	Bergen	1	90	(8)	6	75	(73)	(17)	(1)
Alpine borough	Bergen	1	110	(34)	0	0	34	(144)	(1)
Bergenfield borough	Bergen	1	86	(59)	102	280	(86)	0	(1)
Bogota borough	Bergen	1	27	(3)	34	193	(27)	0	(1)
Carlstadt borough	Bergen	1	94	(30)	74	12	(56)	(38)	(1)
Cliffside Park borough	Bergen	1	45	(173)	174	670	(45)	0	(1)
Closter borough	Bergen	1	81	(106)	11	22	73	(154)	(1)
Cresskill borough	Bergen	1	238	(46)	3	86	(43)	(195)	0
Demarest borough	Bergen	1	63	(61)	5	21	35	(98)	0
Dumont borough	Bergen	1	93	(61)	51	194	(93)	0	0
East Rutherford borough	Bergen	1	88	(18)	101	35	(88)	0	0
Edgewater borough	Bergen	1	242	(64)	35	305	(242)	0	0
Elmwood Park borough	Bergen	1	159	(19)	190	265	(159)	0	0
Emerson borough	Bergen	1	90	(22)	6	55	(39)	(51)	0
Englewood city	Bergen	1	181	(62)	125	415	(181)	0	0
Englewood Cliffs borough	Bergen	1	196	(112)	2	(4)	114	(310)	0
Fair Lawn borough	Bergen	1	271	(42)	93	641	(271)	0	0
Fairview borough	Bergen	1	27	(72)	152	73	(27)	0	0
Fort Lee borough	Bergen	1	142	(158)	133	108	(83)	(59)	0
Franklin Lakes borough	Bergen	1	271	(114)	2	24	88	(359)	0
Garfield city	Bergen	1	0	(48)	446	956	0	0	0
Glen Rock borough	Bergen	1	104	(10)	5	238	(104)	0	0
Hackensack city	Bergen	1	0	(104)	238	1,396	0	0	0
Harrington Park borough	Bergen	1	103	(27)	6	43	(22)	(81)	0
Hasbrouck Heights borough	Bergen	1	295	(35)	45	110	(120)	(175)	0
Haworth borough	Bergen	1	56	(22)	0	30	(8)	(48)	0
Hillsdale borough	Bergen	1	99	(26)	13	105	(92)	(7)	0
Ho-Ho-Kus borough	Bergen	1	79	(21)	3	37	(19)	(60)	0
Leonia borough	Bergen	1	73	(98)	30	(49)	117	(190)	0
Little Ferry borough	Bergen	1	50	(8)	72	149	(50)	0	0
Lodi borough	Bergen	1	0	(45)	302	585	0	0	0
Lyndhurst township	Bergen	1	130	(24)	226	267	(130)	0	0
Mahwah township	Bergen	1	238	(42)	32	360	(238)	0	0
Maywood borough	Bergen	1	55	(42)	51	117	(55)	0	0
Midland Park borough	Bergen	1	46	(11)	22	50	(46)	0	0
Montvale borough	Bergen	1	261	(24)	16	36	(28)	(233)	0
Moonachie borough	Bergen	1	58	(8)	5	8	(5)	(53)	0
New Milford borough	Bergen	1	78	(34)	77	178	(78)	0	0
North Arlington borough	Bergen	1	70	(11)	158	225	(70)	0	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Northvale borough	Bergen	1	47	(19)	13	18	(12)	(35)	0
Norwood borough	Bergen	1	55	(32)	10	(10)	32	(87)	0
Oakland borough	Bergen	1	91	(26)	3	134	(91)	0	0
Old Tappan borough	Bergen	1	194	(64)	5	(1)	60	(254)	0
Oradell borough	Bergen	1	76	(16)	6	104	(76)	0	0
Palisades Park borough	Bergen	1	43	(227)	174	(119)	172	(215)	0
Paramus borough	Bergen	1	419	(133)	27	(27)	133	(552)	0
Park Ridge borough	Bergen	1	87	(43)	26	51	(34)	(53)	0
Ramsey borough	Bergen	1	168	(34)	27	214	(168)	0	0
Ridgefield borough	Bergen	1	70	(66)	98	(109)	77	(147)	0
Ridgefield Park village	Bergen	1	51	(2)	94	163	(51)	0	0
Ridgewood village	Bergen	1	262	(50)	51	461	(262)	0	0
River Edge borough	Bergen	1	124	(10)	32	174	(124)	0	0
River Vale township	Bergen	1	86	(40)	6	103	(69)	(17)	0
Rochelle Park township	Bergen	1	45	(3)	24	55	(45)	0	0
Rockleigh borough	Bergen	1	163	(2)	0	(1)	3	(166)	0
Rutherford borough	Bergen	1	193	(35)	90	143	(193)	0	0
Saddle Brook township	Bergen	1	101	(32)	78	252	(101)	0	0
Saddle River borough	Bergen	1	212	(59)	3	0	56	(268)	0
South Hackensack township	Bergen	1	46	(6)	29	28	(46)	0	0
Teaneck township	Bergen	1	691	(86)	61	666	(641)	(50)	0
Tenafly borough	Bergen	1	120	(146)	30	74	42	(162)	0
Teterboro borough	Bergen	1	88	0	2	0	(2)	(86)	0
Upper Saddle River borough	Bergen	1	222	(106)	5	53	48	(270)	0
Waldwick borough	Bergen	1	73	(16)	13	160	(73)	0	0
Wallington borough	Bergen	1	27	(13)	141	195	(27)	0	0
Washington township	Bergen	1	187	(16)	3	66	(53)	(134)	0
Westwood borough	Bergen	1	66	(18)	38	67	(66)	0	0
Woodcliff Lake borough	Bergen	1	213	(29)	0	33	(4)	(209)	0
Wood-Ridge borough	Bergen	1	41	(21)	34	233	(41)	0	0
Wyckoff township	Bergen	1	188	(61)	8	117	(64)	(124)	0
Bayonne city	Hudson	1	0	(22)	1,256	(2,007)	773	(773)	0
East Newark borough	Hudson	1	7	(2)	56	(30)	(7)	0	0
Guttenberg town	Hudson	1	21	(53)	160	346	(21)	0	0
Harrison town	Hudson	1	145	(66)	298	(415)	183	(328)	0
Hoboken city	Hudson	1	0	(75)	462	748	0	0	0
Jersey City	Hudson	1	0	(882)	3,650	(3,494)	726	(726)	0
Kearny town	Hudson	1	204	(54)	650	(957)	361	(565)	0
North Bergen township	Hudson	1	0	(59)	864	(1,365)	560	(560)	0
Secaucus town	Hudson	1	260	(35)	194	(545)	386	(646)	0
Union City	Hudson	1	0	(165)	883	739	0	0	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Weehawken township	Hudson	1	0	(8)	230	(250)	28	(28)	0
West New York town	Hudson	1	0	(48)	477	351	0	0	0
Bloomington borough	Passaic	1	34	(10)	29	94	(34)	0	0
Clifton city	Passaic	1	0	(45)	920	473	0	0	0
Haledon borough	Passaic	1	34	(6)	117	136	(34)	0	0
Hawthorne borough	Passaic	1	104	(11)	218	70	(104)	0	0
Little Falls township	Passaic	1	123	(40)	86	90	(123)	0	0
North Haledon borough	Passaic	1	114	(11)	22	1	(12)	(102)	0
Passaic city	Passaic	1	0	(70)	718	1,540	0	0	0
Paterson city	Passaic	1	0	(691)	2,453	848	0	0	0
Pompton Lakes borough	Passaic	1	53	(35)	42	329	(53)	0	0
Prospect Park borough	Passaic	1	46	(2)	133	159	(46)	0	0
Ringwood borough	Passaic	1	46	(14)	5	105	(46)	0	0
Totowa borough	Passaic	1	179	(2)	75	(18)	(55)	(124)	0
Wanaque borough	Passaic	1	93	(10)	37	235	(93)	0	0
Wayne township	Passaic	1	700	(88)	74	226	(212)	(488)	0
West Milford township	Passaic	1	71	(3)	21	511	(71)	0	0
Woodland Park borough	Passaic	1	140	(10)	114	(65)	(39)	(101)	0
Andover borough	Sussex	1	14	(2)	3	24	(14)	0	0
Andover township	Sussex	1	252	(16)	5	(30)	41	(293)	0
Branchville borough	Sussex	1	162	(2)	6	5	(9)	(153)	0
Byram township	Sussex	1	91	(8)	5	(72)	75	(166)	0
Frankford township	Sussex	1	33	(32)	3	(12)	41	(74)	0
Franklin borough	Sussex	1	94	(13)	14	24	(25)	(69)	0
Fredon township	Sussex	1	91	(3)	0	(50)	53	(144)	0
Green township	Sussex	1	46	(2)	0	(41)	43	(89)	0
Hamburg borough	Sussex	1	57	(3)	3	4	(4)	(53)	0
Hampton township	Sussex	1	29	(3)	3	(4)	4	(33)	0
Hardyston township	Sussex	1	477	(16)	11	(14)	19	(496)	0
Hopatcong borough	Sussex	1	104	(29)	10	(81)	100	(204)	0
Lafayette township	Sussex	1	77	(5)	3	(13)	15	(92)	0
Montague township	Sussex	1	58	(3)	16	75	(58)	0	0
Newton town	Sussex	1	25	(2)	32	(80)	50	(75)	0
Ogdensburg borough	Sussex	1	15	(2)	5	(23)	20	(35)	0
Sandyston township	Sussex	1	36	(2)	0	(1)	3	(39)	0
Sparta township	Sussex	1	257	(30)	14	(344)	360	(617)	0
Stanhope borough	Sussex	1	30	(5)	11	(3)	(3)	(27)	0
Stillwater township	Sussex	1	47	(3)	3	6	(6)	(41)	0
Sussex borough	Sussex	1	3	(6)	14	14	(3)	0	0
Vernon township	Sussex	1	300	(35)	10	(125)	150	(450)	0
Walpack township	Sussex	1	0	0	0	0	0	0	0



Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Wantage township	Sussex	1	38	(13)	13	(66)	66	(104)	0
Belleville township	Essex	2	0	(30)	138	1,615	0	0	0
Bloomfield township	Essex	2	0	(24)	182	1,583	0	0	0
Caldwell borough	Essex	2	15	(10)	27	23	(15)	0	0
Cedar Grove township	Essex	2	57	(10)	14	24	(28)	(29)	0
City of Orange township	Essex	2	0	(298)	134	1,740	0	0	0
East Orange city	Essex	2	0	(462)	275	3,855	0	0	0
Essex Fells borough	Essex	2	28	(11)	0	34	(23)	(5)	0
Fairfield township	Essex	2	98	(18)	3	41	(26)	(72)	0
Glen Ridge borough	Essex	2	35	(2)	3	289	(35)	0	0
Irvington township	Essex	2	0	(125)	302	3,447	0	0	0
Livingston township	Essex	2	145	(61)	3	503	(145)	0	0
Maplewood township	Essex	2	57	0	42	921	(57)	0	0
Millburn township	Essex	2	218	(192)	18	97	77	(295)	0
Montclair township	Essex	2	0	(32)	107	795	0	0	0
Newark city	Essex	2	0	(1,642)	1,496	11,473	0	0	0
North Caldwell borough	Essex	2	61	(13)	2	151	(61)	0	0
Nutley township	Essex	2	47	(50)	67	489	(47)	0	0
Roseland borough	Essex	2	54	(8)	3	35	(30)	(24)	0
S. Orange Village township	Essex	2	223	(2)	10	430	(223)	0	0
Verona township	Essex	2	39	(24)	19	188	(39)	0	0
West Caldwell township	Essex	2	67	(8)	2	77	(67)	0	0
West Orange township	Essex	2	174	(8)	102	1,209	(174)	0	0
Boonton town	Morris	2	26	(10)	13	21	(24)	(2)	0
Boonton township	Morris	2	36	(8)	0	(1)	9	(45)	0
Butler borough	Morris	2	39	(5)	8	164	(39)	0	0
Chatham borough	Morris	2	49	(38)	3	52	(17)	(32)	0
Chatham township	Morris	2	165	(91)	2	(43)	132	(297)	0
Chester borough	Morris	2	44	(3)	0	(19)	22	(66)	0
Chester township	Morris	2	40	(10)	0	94	(40)	0	0
Denville township	Morris	2	86	(56)	2	433	(86)	0	0
Dover town	Morris	2	25	(13)	22	299	(25)	0	0
East Hanover township	Morris	2	90	(59)	3	(13)	69	(159)	0
Florham Park borough	Morris	2	434	(74)	3	23	48	(482)	0
Hanover township	Morris	2	126	(38)	3	175	(126)	0	0
Harding township	Morris	2	82	(27)	0	7	20	(102)	0
Jefferson township	Morris	2	78	(66)	3	399	(78)	0	0
Kinnelon borough	Morris	2	49	(13)	2	116	(49)	0	0
Lincoln Park borough	Morris	2	80	(10)	6	235	(80)	0	0
Long Hill township	Morris	2	26	(21)	2	3	16	(42)	0
Madison borough	Morris	2	54	(74)	11	26	37	(91)	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Mendham borough	Morris	2	41	(10)	3	41	(34)	(7)	0
Mendham township	Morris	2	60	(16)	0	19	(3)	(57)	0
Mine Hill township	Morris	2	37	(19)	0	117	(37)	0	0
Montville township	Morris	2	85	(62)	3	115	(56)	(29)	0
Morris township	Morris	2	297	(37)	5	287	(255)	(42)	0
Morris Plains borough	Morris	2	35	(11)	2	43	(34)	(1)	0
Morristown town	Morris	2	78	(30)	26	(108)	112	(190)	0
Mountain Lakes borough	Morris	2	35	(19)	0	54	(35)	0	0
Mount Arlington borough	Morris	2	37	(14)	3	110	(37)	0	0
Mount Olive township	Morris	2	204	(26)	14	820	(204)	0	0
Netcong borough	Morris	2	9	(5)	3	123	(9)	0	0
Parsippany-Troy Hills twp	Morris	2	295	(125)	13	1,498	(295)	0	0
Pequannock township	Morris	2	48	(61)	3	97	(39)	(9)	0
Randolph township	Morris	2	110	(40)	6	801	(110)	0	0
Riverdale borough	Morris	2	81	(10)	2	423	(81)	0	0
Rockaway borough	Morris	2	49	(5)	5	140	(49)	0	0
Rockaway township	Morris	2	143	(45)	5	539	(143)	0	0
Roxbury township	Morris	2	94	(42)	6	592	(94)	0	0
Victory Gardens borough	Morris	2	2	0	2	102	(2)	0	0
Washington township	Morris	2	62	(6)	2	(80)	84	(146)	0
Wharton borough	Morris	2	53	(24)	6	135	(53)	0	0
Berkeley Heights township	Union	2	177	(37)	5	(26)	58	(235)	0
Clark township	Union	2	55	(27)	6	(360)	381	(436)	0
Cranford township	Union	2	73	(16)	24	(327)	319	(392)	0
Elizabeth city	Union	2	0	(696)	558	(2,658)	2,796	(2,796)	0
Fanwood borough	Union	2	25	(13)	0	(67)	80	(105)	0
Garwood borough	Union	2	15	(3)	16	(150)	137	(152)	0
Hillside township	Union	2	0	(30)	59	(279)	250	(250)	0
Kenilworth borough	Union	2	38	(26)	11	(172)	187	(225)	0
Linden city	Union	2	148	(91)	138	(685)	638	(786)	0
Mountainside borough	Union	2	45	(24)	2	(40)	62	(107)	0
New Providence borough	Union	2	60	(16)	18	(126)	124	(184)	0
Plainfield city	Union	2	0	(62)	120	(334)	276	(276)	0
Rahway city	Union	2	0	(104)	61	(337)	380	(380)	0
Roselle borough	Union	2	0	(5)	54	(141)	92	(92)	0
Roselle Park borough	Union	2	14	(14)	30	(182)	166	(180)	0
Scotch Plains township	Union	2	70	(130)	13	(256)	373	(443)	0
Springfield township	Union	2	51	(13)	22	(255)	246	(297)	0
Summit city	Union	2	150	(72)	27	(95)	140	(290)	0
Union township	Union	2	126	(16)	98	(1,117)	1,035	(1,161)	0
Westfield town	Union	2	90	(214)	27	(197)	384	(474)	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Winfield township	Union	2	15	0	8	0	(8)	(7)	0
Allamuchy township	Warren	2	53	(2)	2	123	(53)	0	0
Alpha borough	Warren	2	20	0	3	45	(20)	0	0
Belvidere town	Warren	2	28	(2)	5	46	(28)	0	0
Blairstown township	Warren	2	13	(10)	2	(42)	50	(63)	0
Franklin township	Warren	2	22	(5)	0	(30)	35	(57)	0
Frelinghuysen township	Warren	2	68	(2)	0	3	(1)	(67)	0
Greenwich township	Warren	2	61	(6)	3	8	(5)	(56)	0
Hackettstown town	Warren	2	35	(5)	13	(237)	229	(264)	0
Hardwick township	Warren	2	15	0	0	14	(14)	(1)	0
Harmony township	Warren	2	14	(21)	0	34	(13)	(1)	0
Hope township	Warren	2	14	(2)	0	4	(2)	(12)	0
Independence township	Warren	2	15	(3)	2	38	(15)	0	0
Knowlton township	Warren	2	9	(6)	0	10	(4)	(5)	0
Liberty township	Warren	2	18	(21)	0	(10)	31	(49)	0
Lopatcong township	Warren	2	22	(3)	3	36	(22)	0	0
Mansfield township	Warren	2	66	(13)	8	15	(10)	(56)	0
Oxford township	Warren	2	32	(2)	2	24	(24)	(8)	0
Phillipsburg town	Warren	2	24	(22)	34	707	(24)	0	0
Pohatcong township	Warren	2	55	(11)	2	56	(47)	(8)	0
Washington borough	Warren	2	15	(6)	14	140	(15)	0	0
Washington township	Warren	2	76	(10)	0	(38)	48	(124)	0
White township	Warren	2	71	(26)	2	30	(6)	(65)	0
Alexandria township	Hunterdon	3	58	(6)	3	5	(2)	(2)	54
Bethlehem township	Hunterdon	3	63	(8)	0	27	(19)	(2)	42
Bloomsbury borough	Hunterdon	3	79	0	2	50	(52)	(1)	26
Califon borough	Hunterdon	3	41	(2)	0	42	(40)	0	1
Clinton town	Hunterdon	3	42	0	10	56	(42)	0	0
Clinton township	Hunterdon	3	174	(16)	16	271	(174)	0	0
Delaware township	Hunterdon	3	43	(6)	5	42	(41)	0	2
East Amwell township	Hunterdon	3	47	(6)	2	42	(38)	0	9
Flemington borough	Hunterdon	3	25	(3)	42	113	(25)	0	0
Franklin township	Hunterdon	3	26	(5)	3	(225)	227	(9)	244
Frenchtown borough	Hunterdon	3	26	(2)	10	74	(26)	0	0
Glen Gardner borough	Hunterdon	3	12	(3)	8	145	(12)	0	0
Hampton borough	Hunterdon	3	20	(3)	6	38	(20)	0	0
High Bridge borough	Hunterdon	3	45	(3)	8	127	(45)	0	0
Holland township	Hunterdon	3	32	(3)	5	93	(32)	0	0
Kingwood township	Hunterdon	3	42	(8)	6	30	(28)	(1)	13
Lambertville city	Hunterdon	3	31	(16)	30	40	(31)	0	0
Lebanon borough	Hunterdon	3	56	(3)	8	82	(56)	0	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Lebanon township	Hunterdon	3	44	(11)	6	77	(44)	0	
Milford borough	Hunterdon	3	24	(2)	5	90	(24)	0	
Raritan township	Hunterdon	3	312	(38)	11	293	(266)	(2)	44
Readington township	Hunterdon	3	587	(38)	10	417	(389)	(7)	190
Stockton borough	Hunterdon	3	20	(2)	3	23	(20)	0	
Tewksbury township	Hunterdon	3	107	(8)	2	89	(83)	(1)	23
Union township	Hunterdon	3	49	(10)	5	(416)	421	(17)	453
West Amwell township	Hunterdon	3	33	(11)	3	(13)	21	(2)	52
Carteret borough	Middlesex	3	0	(30)	157	(610)	483	(18)	465
Cranbury township	Middlesex	3	153	(16)	8	(32)	40	(7)	186
Dunellen borough	Middlesex	3	21	(18)	61	(168)	125	(5)	141
East Brunswick township	Middlesex	3	343	(6)	46	(861)	821	(43)	1,121
Edison township	Middlesex	3	628	(166)	203	(2,175)	2,138	(102)	2,664
Helmetta borough	Middlesex	3	18	0	0	(24)	24	(2)	40
Highland Park borough	Middlesex	3	40	(19)	154	(604)	469	(19)	490
Jamesburg borough	Middlesex	3	80	(13)	42	(153)	124	(8)	196
Metuchen borough	Middlesex	3	139	(66)	43	(451)	474	(23)	590
Middlesex borough	Middlesex	3	57	(35)	35	(257)	257	(12)	302
Milltown borough	Middlesex	3	41	(2)	38	(161)	125	(6)	160
Monroe township	Middlesex	3	707	(27)	75	(2,633)	2,585	(122)	3,170
New Brunswick city	Middlesex	3	0	(266)	419	(967)	814	(30)	784
North Brunswick township	Middlesex	3	287	(32)	138	(741)	635	(34)	888
Old Bridge township	Middlesex	3	364	(59)	197	(1,496)	1,358	(64)	1,658
Perth Amboy city	Middlesex	3	0	(56)	578	(753)	231	(9)	222
Piscataway township	Middlesex	3	330	(51)	147	(721)	625	(35)	920
Plainsboro township	Middlesex	3	335	(10)	83	(570)	497	(31)	801
Sayreville borough	Middlesex	3	205	(34)	91	(1,030)	973	(44)	1,134
South Amboy city	Middlesex	3	42	(11)	54	(255)	212	(9)	245
South Brunswick township	Middlesex	3	517	(40)	70	(680)	650	(43)	1,124
South Plainfield borough	Middlesex	3	269	(37)	37	(422)	422	(26)	665
South River borough	Middlesex	3	31	(13)	93	(430)	350	(14)	367
Spotswood borough	Middlesex	3	35	(8)	14	(186)	180	(8)	207
Woodbridge township	Middlesex	3	548	(136)	246	(2,026)	1,916	(91)	2,373
Bedminster township	Somerset	3	127	(11)	18	(121)	114	(9)	232
Bernards township	Somerset	3	781	(59)	29	83	(53)	(27)	701
Bernardsville borough	Somerset	3	81	(34)	14	(46)	66	(5)	142
Bound Brook borough	Somerset	3	23	(13)	75	74	(23)	0	0
Branchburg township	Somerset	3	359	(21)	6	60	(45)	(12)	302
Bridgewater township	Somerset	3	412	(85)	48	(274)	311	(27)	696
Far Hills borough	Somerset	3	38	0	2	(7)	5	(2)	41
Franklin township	Somerset	3	658	(99)	117	616	(634)	(1)	23



Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Green Brook township	Somerset	3	158	(8)	3	(15)	20	(7)	171
Hillsborough township	Somerset	3	680	(16)	22	406	(412)	(10)	258
Manville borough	Somerset	3	19	(34)	66	(66)	34	(2)	51
Millstone borough	Somerset	3	24	(2)	0	(6)	8	(1)	31
Montgomery township	Somerset	3	388	(35)	8	259	(232)	(6)	150
North Plainfield borough	Somerset	3	35	(3)	112	(183)	74	(4)	105
Peapack & Gladstone bor.	Somerset	3	173	(8)	6	21	(19)	(6)	148
Raritan borough	Somerset	3	68	(6)	51	(53)	8	(3)	73
Rocky Hill borough	Somerset	3	24	(2)	2	(17)	17	(2)	39
Somerville borough	Somerset	3	55	(8)	75	33	(55)	0	0
South Bound Brook borough	Somerset	3	15	(6)	24	62	(15)	0	0
Warren township	Somerset	3	280	(53)	3	7	43	(12)	311
Watchung borough	Somerset	3	144	(35)	2	(64)	97	(9)	232
East Windsor township	Mercer	4	266	(14)	37	(383)	360	(341)	285
Ewing township	Mercer	4	752	(22)	61	(118)	79	(452)	379
Hamilton township	Mercer	4	731	(109)	194	(957)	872	(872)	731
Hightstown borough	Mercer	4	34	(11)	19	(76)	68	(55)	47
Hopewell borough	Mercer	4	26	(10)	6	(43)	47	(40)	33
Hopewell township	Mercer	4	664	(29)	13	(25)	41	(384)	321
Lawrence township	Mercer	4	269	(26)	48	(248)	226	(269)	226
Pennington borough	Mercer	4	41	(3)	5	(76)	74	(63)	52
Princeton	Mercer	4	477	(104)	88	5	11	(266)	222
Robbinsville township	Mercer	4	245	(18)	3	(259)	274	(282)	237
Trenton city	Mercer	4	0	(344)	448	1,293	0	0	0
West Windsor township	Mercer	4	361	(35)	24	445	(361)	0	0
Aberdeen township	Monmouth	4	81	(38)	16	735	(81)	0	0
Allenhurst borough	Monmouth	4	18	(10)	3	(4)	11	(16)	13
Allentown borough	Monmouth	4	27	(2)	3	67	(27)	0	0
Asbury Park city	Monmouth	4	0	(78)	102	990	0	0	0
Atlantic Highlands borough	Monmouth	4	30	(5)	8	4	(7)	(13)	10
Avon-by-the-Sea borough	Monmouth	4	16	(53)	10	(51)	94	(60)	50
Belmar borough	Monmouth	4	22	(94)	40	(291)	345	(200)	167
Bradley Beach borough	Monmouth	4	23	(37)	40	(181)	178	(109)	92
Brielle borough	Monmouth	4	55	(54)	11	(81)	124	(97)	82
Colts Neck township	Monmouth	4	75	(34)	8	91	(65)	(5)	5
Deal borough	Monmouth	4	22	(27)	2	(18)	43	(35)	30
Eatontown borough	Monmouth	4	135	(45)	50	11	(16)	(65)	54
Englishtown borough	Monmouth	4	22	(3)	5	68	(22)	0	0
Fair Haven borough	Monmouth	4	50	(56)	2	(14)	68	(64)	54
Farmingdale borough	Monmouth	4	13	(3)	3	6	(6)	(4)	3
Freehold borough	Monmouth	4	43	(3)	26	372	(43)	0	0



Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Freehold township	Monmouth	4	393	(14)	19	354	(359)	(18)	16
Hazlet township	Monmouth	4	80	(27)	5	178	(80)	0	0
Highlands borough	Monmouth	4	22	(37)	19	419	(22)	0	0
Holmdel township	Monmouth	4	119	(14)	2	92	(80)	(21)	18
Howell township	Monmouth	4	316	(61)	22	841	(316)	0	0
Interlaken borough	Monmouth	4	30	(2)	0	(12)	14	(24)	20
Keansburg borough	Monmouth	4	34	(56)	32	738	(34)	0	0
Keyport borough	Monmouth	4	25	(19)	27	238	(25)	0	0
Lake Como borough	Monmouth	4	12	(37)	6	13	18	(16)	14
Little Silver borough	Monmouth	4	58	(30)	0	110	(58)	0	0
Loch Arbour village	Monmouth	4	24	(3)	0	(3)	6	(16)	14
Long Branch city	Monmouth	4	0	(86)	144	(493)	435	(237)	198
Manalapan township	Monmouth	4	202	(40)	19	780	(202)	0	0
Manasquan borough	Monmouth	4	34	(160)	27	(170)	303	(183)	154
Marlboro township	Monmouth	4	363	(42)	13	856	(363)	0	0
Matawan borough	Monmouth	4	44	(10)	14	216	(44)	0	0
Middletown township	Monmouth	4	355	(170)	37	1,061	(355)	0	0
Millstone township	Monmouth	4	88	(32)	0	88	(56)	(17)	15
Monmouth Beach borough	Monmouth	4	27	(40)	3	(102)	139	(90)	76
Neptune township	Monmouth	4	145	(54)	69	(7)	(8)	(75)	62
Neptune City borough	Monmouth	4	71	(10)	13	136	(71)	0	0
Ocean township	Monmouth	4	138	(48)	35	(14)	27	(90)	75
Oceanport borough	Monmouth	4	95	(24)	6	(19)	37	(72)	60
Red Bank borough	Monmouth	4	89	(32)	70	(167)	129	(119)	99
Roosevelt borough	Monmouth	4	15	(3)	2	55	(15)	0	0
Rumson borough	Monmouth	4	78	(163)	2	(7)	168	(134)	112
Sea Bright borough	Monmouth	4	20	(16)	10	(61)	67	(47)	40
Sea Girt borough	Monmouth	4	49	(91)	2	(5)	94	(78)	65
Shrewsbury borough	Monmouth	4	66	(6)	0	(31)	37	(56)	47
Shrewsbury township	Monmouth	4	36	(16)	3	100	(36)	0	0
Spring Lake borough	Monmouth	4	37	(104)	3	(4)	105	(77)	65
Spring Lake Heights bor.	Monmouth	4	22	(53)	14	(199)	238	(141)	119
Tinton Falls borough	Monmouth	4	276	(34)	8	575	(276)	0	0
Union Beach borough	Monmouth	4	42	(40)	8	146	(42)	0	0
Upper Freehold township	Monmouth	4	53	(21)	0	(38)	59	(61)	51
Wall township	Monmouth	4	382	(125)	22	(35)	138	(283)	237
West Long Branch borough	Monmouth	4	59	(16)	11	4	1	(33)	27
Barnegat township	Ocean	4	181	(21)	11	(19)	29	(114)	96
Barnegat Light borough	Ocean	4	18	(10)	13	(44)	41	(32)	27
Bay Head borough	Ocean	4	19	(24)	3	(17)	38	(31)	26
Beach Haven borough	Ocean	4	24	(106)	50	(185)	241	(144)	121



Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Beachwood borough	Ocean	4	31	(29)	6	161	(31)	0	0
Berkeley township	Ocean	4	224	(122)	24	1,800	(224)	0	0
Brick township	Ocean	4	410	(362)	62	289	11	(229)	192
Eagleswood township	Ocean	4	71	(10)	2	12	(4)	(36)	31
Harvey Cedars borough	Ocean	4	18	(14)	13	(21)	22	(22)	18
Island Heights borough	Ocean	4	20	(13)	2	(23)	34	(29)	25
Jackson township	Ocean	4	551	(27)	32	(184)	179	(397)	333
Lacey township	Ocean	4	156	(106)	8	178	(80)	(41)	35
Lakehurst borough	Ocean	4	14	(2)	8	64	(14)	0	0
Lakewood township	Ocean	4	0	(365)	197	(606)	774	(421)	353
Lavallette borough	Ocean	4	15	(130)	54	(152)	228	(132)	111
Little Egg Harbor township	Ocean	4	189	(158)	22	284	(148)	(22)	19
Long Beach township	Ocean	4	30	(317)	134	(374)	557	(319)	268
Manchester township	Ocean	4	316	(86)	218	508	(316)	0	0
Mantoloking borough	Ocean	4	32	(29)	0	(2)	31	(34)	29
Ocean township	Ocean	4	122	(59)	2	10	47	(92)	77
Ocean Gate borough	Ocean	4	12	(11)	6	55	(12)	0	0
Pine Beach borough	Ocean	4	21	(2)	0	2	0	(11)	10
Plumsted township	Ocean	4	40	(18)	11	(57)	64	(57)	47
Point Pleasant borough	Ocean	4	61	(158)	42	(219)	335	(215)	181
Point Pleasant Beach bor.	Ocean	4	62	(109)	43	(390)	456	(282)	236
Seaside Heights borough	Ocean	4	3	(90)	109	23	(3)	0	0
Seaside Park borough	Ocean	4	9	(86)	40	(262)	308	(172)	145
Ship Bottom borough	Ocean	4	12	(101)	43	(199)	257	(146)	123
South Toms River borough	Ocean	4	16	(2)	2	70	(16)	0	0
Stafford township	Ocean	4	159	(218)	18	(180)	380	(293)	246
Surf City borough	Ocean	4	18	(88)	42	(163)	209	(124)	103
Toms River township	Ocean	4	449	(778)	77	(308)	1,009	(793)	665
Tuckerton borough	Ocean	4	53	(19)	5	36	(22)	(17)	14
Bass River township	Burlington	5	13	(6)	0	1	5	(2)	16
Beverly city	Burlington	5	12	(8)	0	47	(12)	0	0
Bordentown city	Burlington	5	29	(13)	2	53	(29)	0	0
Bordentown township	Burlington	5	124	(10)	2	(115)	123	(25)	222
Burlington city	Burlington	5	45	(32)	2	199	(45)	0	0
Burlington township	Burlington	5	372	(10)	2	(297)	305	(69)	608
Chesterfield township	Burlington	5	59	(32)	0	99	(59)	0	0
Cinnaminson township	Burlington	5	138	(21)	0	48	(27)	(11)	100
Delanco township	Burlington	5	54	(5)	0	85	(54)	0	0
Delran township	Burlington	5	244	(13)	2	(35)	46	(29)	261
Eastampton township	Burlington	5	162	(13)	0	(40)	53	(22)	193
Edgewater Park township	Burlington	5	122	(2)	2	154	(122)	0	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Evesham township	Burlington	5	707	(21)	2	(230)	249	(97)	859
Fieldsboro borough	Burlington	5	15	(3)	0	9	(6)	(1)	8
Florence township	Burlington	5	116	(29)	2	101	(74)	(4)	38
Hainesport township	Burlington	5	140	(14)	0	(154)	168	(31)	277
Lumberton township	Burlington	5	299	(8)	0	(258)	266	(57)	508
Mansfield township	Burlington	5	158	(18)	0	(199)	217	(38)	337
Maple Shade township	Burlington	5	112	(40)	5	529	(112)	0	0
Medford township	Burlington	5	237	(10)	0	(313)	323	(57)	503
Medford Lakes borough	Burlington	5	45	(10)	0	(17)	27	(7)	65
Moorestown township	Burlington	5	436	(46)	2	(107)	151	(60)	527
Mount Holly township	Burlington	5	78	(149)	3	123	23	(10)	91
Mount Laurel township	Burlington	5	639	(42)	3	127	(88)	(56)	495
New Hanover township	Burlington	5	117	(2)	0	(73)	75	(20)	172
North Hanover township	Burlington	5	23	(24)	0	(175)	199	(23)	199
Palmyra borough	Burlington	5	48	(8)	2	99	(48)	0	0
Pemberton borough	Burlington	5	15	(6)	0	(14)	20	(4)	31
Pemberton township	Burlington	5	103	(54)	2	167	(103)	0	0
Riverside township	Burlington	5	23	(8)	2	134	(23)	0	0
Riverton borough	Burlington	5	45	(2)	0	(30)	32	(8)	69
Shamong township	Burlington	5	54	(6)	0	(102)	108	(16)	146
Southampton township	Burlington	5	42	(40)	0	(89)	129	(17)	154
Springfield township	Burlington	5	87	(5)	0	(14)	19	(11)	95
Tabernacle township	Burlington	5	71	(10)	0	(72)	82	(16)	137
Washington township	Burlington	5	18	(10)	0	16	(6)	(1)	11
Westampton township	Burlington	5	268	(13)	0	(47)	60	(33)	295
Willingboro township	Burlington	5	107	(14)	0	201	(107)	0	0
Woodland township	Burlington	5	70	(6)	0	(6)	12	(8)	74
Wrightstown borough	Burlington	5	33	(3)	0	5	(2)	(3)	28
Audubon borough	Camden	5	43	(5)	3	(105)	107	(15)	135
Audubon Park borough	Camden	5	17	0	0	0	0	(2)	15
Barrington borough	Camden	5	33	(46)	2	(140)	184	(22)	195
Bellmawr borough	Camden	5	49	(13)	2	(51)	62	(11)	100
Berlin borough	Camden	5	85	(10)	2	(169)	177	(27)	235
Berlin township	Camden	5	130	(38)	2	(66)	102	(24)	208
Brooklawn borough	Camden	5	29	0	0	0	0	(3)	26
Camden city	Camden	5	0	(1,102)	26	1,617	0	0	0
Cherry Hill township	Camden	5	974	(74)	6	(923)	991	(200)	1,765
Chesilhurst borough	Camden	5	25	(18)	0	(7)	25	(5)	45
Clementon borough	Camden	5	40	(10)	2	(12)	20	(6)	54
Collingswood borough	Camden	5	49	(19)	8	(285)	296	(35)	310
Gibbsboro borough	Camden	5	50	(5)	0	(23)	28	(8)	70

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Gloucester township	Camden	5	518	(13)	10	(556)	559	(110)	967
Gloucester City	Camden	5	0	(62)	3	109	0	0	0
Haddon township	Camden	5	86	(19)	3	(290)	306	(40)	352
Haddonfield borough	Camden	5	133	(29)	2	(377)	404	(55)	482
Haddon Heights borough	Camden	5	54	(8)	2	(178)	184	(24)	214
Hi-Nella borough	Camden	5	3	0	0	(2)	2	(1)	4
Laurel Springs borough	Camden	5	29	0	0	(11)	11	(4)	36
Lawnside borough	Camden	5	40	(16)	0	0	16	(6)	50
Lindenwold borough	Camden	5	0	(19)	5	237	0	0	0
Magnolia borough	Camden	5	30	(13)	0	(31)	44	(8)	66
Merchantville borough	Camden	5	18	0	3	(46)	43	(6)	55
Mount Ephraim borough	Camden	5	26	(14)	0	(14)	28	(5)	49
Oaklyn borough	Camden	5	55	0	2	(37)	35	(9)	81
Pennsauken township	Camden	5	0	(43)	8	(301)	336	(34)	302
Pine Hill borough	Camden	5	55	(21)	2	(66)	85	(14)	126
Pine Valley borough	Camden	5	23	(3)	0	0	3	(3)	23
Runnemede borough	Camden	5	41	(8)	2	(97)	103	(15)	129
Somerdale borough	Camden	5	36	(5)	2	(60)	63	(10)	89
Stratford borough	Camden	5	34	(21)	2	(35)	54	(9)	79
Tavistock borough	Camden	5	9	0	0	0	0	(1)	8
Voorhees township	Camden	5	323	(27)	3	(668)	692	(103)	912
Waterford township	Camden	5	61	(18)	0	(107)	125	(19)	167
Winslow township	Camden	5	335	(133)	3	(667)	797	(115)	1,017
Woodlynne borough	Camden	5	3	0	2	38	(3)	0	0
Clayton borough	Gloucester	5	70	(24)	2	(41)	63	(14)	119
Deptford township	Gloucester	5	328	(78)	3	(318)	393	(73)	648
East Greenwich township	Gloucester	5	184	(5)	2	154	(151)	(3)	30
Elk township	Gloucester	5	158	(5)	0	(42)	47	(21)	184
Franklin township	Gloucester	5	182	(58)	2	(115)	171	(36)	317
Glassboro borough	Gloucester	5	250	(94)	2	(344)	436	(70)	616
Greenwich township	Gloucester	5	76	(8)	0	(20)	28	(11)	93
Harrison township	Gloucester	5	267	(38)	0	(282)	320	(60)	527
Logan township	Gloucester	5	400	(10)	0	(1)	11	(42)	369
Mantua township	Gloucester	5	226	(14)	0	(87)	101	(33)	294
Monroe township	Gloucester	5	279	(72)	2	(514)	584	(88)	775
National Park borough	Gloucester	5	17	(5)	0	1	4	(2)	19
Newfield borough	Gloucester	5	14	0	0	(11)	11	(3)	22
Paulsboro borough	Gloucester	5	58	(18)	3	45	(30)	(3)	25
Pitman borough	Gloucester	5	42	(5)	2	(39)	42	(9)	75
South Harrison township	Gloucester	5	48	(6)	0	(68)	74	(12)	110
Swedesboro borough	Gloucester	5	42	(5)	0	62	(42)	0	0

Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
Washington township	Gloucester	5	449	(30)	3	(382)	409	(87)	771
Wenonah borough	Gloucester	5	40	(3)	0	(12)	15	(6)	49
West Deptford township	Gloucester	5	236	(19)	2	(203)	220	(46)	410
Westville borough	Gloucester	5	23	(3)	2	3	(2)	(2)	19
Woodbury city	Gloucester	5	145	(19)	3	23	(7)	(14)	124
Woodbury Heights borough	Gloucester	5	52	0	0	(11)	11	(6)	57
Woolwich township	Gloucester	5	208	(5)	0	818	(208)	0	0
Absecon city	Atlantic	6	41	(6)	8	112	(41)	0	0
Atlantic City	Atlantic	6	0	(370)	187	448	0	0	0
Brigantine city	Atlantic	6	32	(270)	75	(1,333)	1,528	(1,404)	156
Buena borough	Atlantic	6	14	(27)	16	185	(14)	0	0
Buena Vista township	Atlantic	6	24	(13)	11	146	(24)	0	0
Corbin City	Atlantic	6	9	(13)	0	18	(5)	(4)	0
Egg Harbor township	Atlantic	6	424	(192)	29	329	(166)	(232)	26
Egg Harbor City	Atlantic	6	18	(5)	16	122	(18)	0	0
Estell Manor city	Atlantic	6	14	(6)	0	20	(14)	0	0
Folsom borough	Atlantic	6	14	(5)	0	33	(14)	0	0
Galloway township	Atlantic	6	372	(104)	34	714	(372)	0	0
Hamilton township	Atlantic	6	222	(35)	27	(283)	291	(462)	51
Hammonton town	Atlantic	6	101	(34)	35	272	(101)	0	0
Linwood city	Atlantic	6	51	(27)	3	(49)	73	(112)	12
Longport borough	Atlantic	6	16	(82)	5	(111)	188	(184)	20
Margate City	Atlantic	6	51	(230)	37	(798)	991	(938)	104
Mullica township	Atlantic	6	42	(24)	2	77	(42)	0	0
Northfield city	Atlantic	6	51	(16)	3	42	(29)	(20)	2
Pleasantville city	Atlantic	6	0	(61)	35	840	0	0	0
Port Republic city	Atlantic	6	18	(2)	0	(7)	9	(24)	3
Somers Point city	Atlantic	6	55	(19)	26	17	(24)	(28)	3
Ventnor City	Atlantic	6	29	(13)	70	(361)	304	(300)	33
Weymouth township	Atlantic	6	12	(6)	3	47	(12)	0	0
Avalon borough	Cape May	6	30	(501)	30	(91)	562	(533)	59
Cape May city	Cape May	6	79	(46)	42	(75)	79	(142)	16
Cape May Point borough	Cape May	6	9	(21)	2	(10)	29	(34)	4
Dennis township	Cape May	6	64	(24)	0	304	(64)	0	0
Lower township	Cape May	6	65	(136)	19	2,134	(65)	0	0
Middle township	Cape May	6	149	(106)	29	1,326	(149)	0	0
North Wildwood city	Cape May	6	14	(174)	117	842	(14)	0	0
Ocean City	Cape May	6	57	(1,464)	208	(363)	1,619	(1,508)	168
Sea Isle City	Cape May	6	14	(570)	61	(131)	640	(589)	65
Stone Harbor borough	Cape May	6	14	(186)	24	(39)	201	(193)	22
Upper township	Cape May	6	99	(27)	3	651	(99)	0	0



Municipality	County	Reg.	Initial Gap Allocation	LMI Demolitions	LMI Conversions	Net Filtering	Secondary Sources Net Impact on Allocation	Remaining Secondary Source Allocation	Adjusted Gap Allocation
West Cape May borough	Cape May	6	7	(19)	5	25	(7)	0	0
West Wildwood borough	Cape May	6	5	(29)	8	62	(5)	0	0
Wildwood city	Cape May	6	16	(187)	131	930	(16)	0	0
Wildwood Crest borough	Cape May	6	18	(114)	59	361	(18)	0	0
Woodbine borough	Cape May	6	36	(6)	2	177	(36)	0	0
Bridgeton city	Cumberland	6	0	(94)	70	311	0	0	0
Commercial township	Cumberland	6	10	(35)	2	68	(10)	0	0
Deerfield township	Cumberland	6	51	(19)	2	11	6	(51)	6
Downe township	Cumberland	6	9	(27)	0	(8)	35	(40)	4
Fairfield township	Cumberland	6	103	(21)	3	14	4	(96)	11
Greenwich township	Cumberland	6	11	(5)	2	5	(2)	(8)	1
Hopewell township	Cumberland	6	87	(6)	3	11	(8)	(71)	8
Lawrence township	Cumberland	6	15	0	2	21	(15)	0	0
Maurice River township	Cumberland	6	36	(27)	3	11	13	(44)	5
Millville city	Cumberland	6	152	(141)	74	7	60	(191)	21
Shiloh borough	Cumberland	6	12	(2)	2	1	(1)	(10)	1
Stow Creek township	Cumberland	6	12	(3)	0	3	0	(11)	1
Upper Deerfield township	Cumberland	6	165	(58)	13	(49)	94	(233)	26
Vineland city	Cumberland	6	0	(197)	150	(320)	367	(330)	37
Alloway township	Salem	6	26	(2)	2	20	(20)	(5)	1
Carneys Point township	Salem	6	179	(24)	6	62	(44)	(121)	14
Elmer borough	Salem	6	41	(2)	3	0	(1)	(36)	4
Elsinboro township	Salem	6	12	(8)	2	5	1	(12)	1
Lower Alloways Creek twp	Salem	6	92	(5)	2	15	(12)	(72)	8
Mannington township	Salem	6	35	(10)	0	5	5	(36)	4
Oldmans township	Salem	6	145	(8)	3	29	(24)	(109)	12
Penns Grove borough	Salem	6	0	(3)	19	142	0	0	0
Pennsville township	Salem	6	91	(34)	24	56	(46)	(40)	5
Pilesgrove township	Salem	6	94	(21)	0	(36)	57	(136)	15
Pittsgrove township	Salem	6	35	(27)	2	(23)	48	(75)	8
Quinton township	Salem	6	12	(8)	2	19	(12)	0	0
Salem city	Salem	6	10	(85)	24	193	(10)	0	0
Upper Pittsgrove township	Salem	6	20	(29)	0	(5)	34	(49)	5
Woodstown borough	Salem	6	20	(11)	10	(45)	46	(59)	7

APPENDIX D: MUNICIPAL ALLOCATION CAPS

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Allendale borough	Bergen	1	14	81	0	0	0	95
Alpine borough	Bergen	1	2	148	0	(21)	0	129
Bergenfield borough	Bergen	1	60	0	0	0	0	60
Bogota borough	Bergen	1	0	0	0	0	0	0
Carlstadt borough	Bergen	1	32	89	0	0	0	121
Cliffside Park borough	Bergen	1	11	0	0	0	0	11
Closter borough	Bergen	1	0	126	0	0	0	126
Cresskill borough	Bergen	1	40	290	0	0	0	330
Demarest borough	Bergen	1	0	106	0	0	0	106
Dumont borough	Bergen	1	3	0	0	0	0	3
East Rutherford borough	Bergen	1	175	12	0	0	0	187
Edgewater borough	Bergen	1	0	213	0	0	0	213
Elmwood Park borough	Bergen	1	40	7	0	0	0	47
Emerson borough	Bergen	1	53	64	0	0	0	117
Englewood city	Bergen	1	247	0	0	0	0	247
Englewood Cliffs borough	Bergen	1	0	294	0	0	0	294
Fair Lawn borough	Bergen	1	108	0	0	0	0	108
Fairview borough	Bergen	1	115	0	0	0	0	115
Fort Lee borough	Bergen	1	248	158	0	0	0	406
Franklin Lakes borough	Bergen	1	30	377	0	0	0	407
Garfield city	Bergen	1	0	0	0	0	0	0
Glen Rock borough	Bergen	1	13	48	0	0	0	61
Hackensack city	Bergen	1	0	0	0	0	0	0
Harrington Park borough	Bergen	1	4	104	0	0	0	108
Hasbrouck Heights borough	Bergen	1	64	262	0	0	0	326
Haworth borough	Bergen	1	0	43	0	0	0	43
Hillsdale borough	Bergen	1	13	80	0	0	0	93
Ho-Ho-Kus borough	Bergen	1	10	100	0	0	0	110
Leonia borough	Bergen	1	71	124	0	0	0	195
Little Ferry borough	Bergen	1	23	0	0	0	0	23
Lodi borough	Bergen	1	63	0	0	0	0	63
Lyndhurst township	Bergen	1	151	0	0	0	0	151
Mahwah township	Bergen	1	64	86	0	0	0	150
Maywood borough	Bergen	1	25	3	0	0	0	28
Midland Park borough	Bergen	1	23	34	0	0	0	57
Montvale borough	Bergen	1	2	303	0	0	0	305
Moonachie borough	Bergen	1	28	35	0	0	0	63
New Milford borough	Bergen	1	36	8	0	0	0	44
North Arlington borough	Bergen	1	67	0	0	0	0	67

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Northvale borough	Bergen	1	3	53	0	0	0	56
Norwood borough	Bergen	1	0	71	0	0	0	71
Oakland borough	Bergen	1	24	29	0	0	0	53
Old Tappan borough	Bergen	1	9	257	0	0	0	266
Oradell borough	Bergen	1	14	18	0	0	0	32
Palisades Park borough	Bergen	1	125	80	0	0	0	205
Paramus borough	Bergen	1	133	529	0	0	0	662
Park Ridge borough	Bergen	1	108	66	0	0	0	174
Ramsey borough	Bergen	1	50	86	0	0	0	136
Ridgefield borough	Bergen	1	133	74	0	0	0	207
Ridgefield Park village	Bergen	1	29	0	0	0	0	29
Ridgewood village	Bergen	1	4	244	0	0	0	248
River Edge borough	Bergen	1	24	0	0	0	0	24
River Vale township	Bergen	1	19	78	0	0	0	97
Rochelle Park township	Bergen	1	0	17	0	0	0	17
Rockleigh borough	Bergen	1	0	190	0	(176)	0	14
Rutherford borough	Bergen	1	159	115	0	0	0	274
Saddle Brook township	Bergen	1	36	8	0	0	0	44
Saddle River borough	Bergen	1	43	277	0	(63)	0	257
South Hackensack township	Bergen	1	55	48	0	0	0	103
Teaneck township	Bergen	1	79	390	0	0	0	469
Tenafly borough	Bergen	1	21	202	0	0	0	223
Teterboro borough	Bergen	1	0	101	0	(95)	0	6
Upper Saddle River borough	Bergen	1	7	308	0	0	0	315
Waldwick borough	Bergen	1	41	0	0	0	0	41
Wallington borough	Bergen	1	0	0	0	0	0	0
Washington township	Bergen	1	0	156	0	0	0	156
Westwood borough	Bergen	1	50	23	0	0	0	73
Woodcliff Lake borough	Bergen	1	16	257	0	0	0	273
Wood-Ridge borough	Bergen	1	0	0	0	0	0	0
Wyckoff township	Bergen	1	31	225	0	0	0	256
Bayonne city	Hudson	1	845	682	0	0	(527)	1,000
East Newark borough	Hudson	1	8	20	0	0	0	28
Guttenberg town	Hudson	1	0	0	0	0	0	0
Harrison town	Hudson	1	248	397	0	0	0	645
Hoboken city	Hudson	1	0	0	0	0	0	0
Jersey City	Hudson	1	4,372	1,211	0	0	0	5,583
Kearny town	Hudson	1	227	481	0	0	0	708
North Bergen township	Hudson	1	793	134	0	0	0	927
Secaucus town	Hudson	1	54	399	0	0	0	453
Union City	Hudson	1	1,271	0	0	0	(271)	1,000

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Weehawken township	Hudson	1	54	0	0	0	0	54
West New York town	Hudson	1	405	0	0	0	0	405
Bloomington borough	Passaic	1	56	0	0	0	0	56
Clifton city	Passaic	1	1,182	0	0	0	(182)	1,000
Haledon borough	Passaic	1	0	0	0	0	0	0
Hawthorne borough	Passaic	1	34	0	0	0	0	34
Little Falls township	Passaic	1	152	42	0	0	0	194
North Haledon borough	Passaic	1	0	115	0	0	0	115
Passaic city	Passaic	1	5,170	0	0	0	(4,170)	1,000
Paterson city	Passaic	1	2,110	0	0	0	(1,110)	1,000
Pompton Lakes borough	Passaic	1	0	0	0	0	0	0
Prospect Park borough	Passaic	1	0	0	0	0	0	0
Ringwood borough	Passaic	1	0	0	0	0	0	0
Totowa borough	Passaic	1	137	147	0	0	0	284
Wanaque borough	Passaic	1	4	0	0	0	0	4
Wayne township	Passaic	1	272	567	0	0	0	839
West Milford township	Passaic	1	0	0	0	0	0	0
Woodland Park borough	Passaic	1	246	116	0	0	0	362
Andover borough	Sussex	1	0	0	0	0	0	0
Andover township	Sussex	1	7	183	0	0	0	190
Branchville borough	Sussex	1	1	189	0	(114)	0	76
Byram township	Sussex	1	28	43	0	0	0	71
Frankford township	Sussex	1	31	49	0	0	0	80
Franklin borough	Sussex	1	1	0	0	0	0	1
Fredon township	Sussex	1	23	99	0	0	0	122
Green township	Sussex	1	0	0	0	0	0	0
Hamburg borough	Sussex	1	0	0	0	0	0	0
Hampton township	Sussex	1	8	35	0	0	0	43
Hardyston township	Sussex	1	20	399	0	0	0	419
Hopalong borough	Sussex	1	0	0	0	0	0	0
Lafayette township	Sussex	1	0	89	0	0	0	89
Montague township	Sussex	1	0	0	0	0	0	0
Newton town	Sussex	1	172	131	0	0	0	303
Ogdensburg borough	Sussex	1	0	0	0	0	0	0
Sandyston township	Sussex	1	0	0	0	0	0	0
Sparta township	Sussex	1	0	0	0	0	0	0
Stanhope borough	Sussex	1	0	0	0	0	0	0
Stillwater township	Sussex	1	0	23	0	0	0	23
Sussex borough	Sussex	1	0	0	0	0	0	0
Vernon township	Sussex	1	43	8	0	0	0	51
Walpack township	Sussex	1	0	1	0	(1)	0	0

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Wantage township	Sussex	1	0	0	0	0	0	0
Belleville township	Essex	2	101	0	0	0	0	101
Bloomfield township	Essex	2	0	0	0	0	0	0
Caldwell borough	Essex	2	14	7	0	0	0	21
Cedar Grove township	Essex	2	15	24	0	0	0	39
City of Orange township	Essex	2	38	0	0	0	0	38
East Orange city	Essex	2	0	0	0	0	0	0
Essex Fells borough	Essex	2	0	38	0	0	0	38
Fairfield township	Essex	2	45	71	0	0	0	116
Glen Ridge borough	Essex	2	0	0	0	0	0	0
Irvington township	Essex	2	0	0	0	0	0	0
Livingston township	Essex	2	14	80	0	0	0	94
Maplewood township	Essex	2	0	0	0	0	0	0
Millburn township	Essex	2	137	274	0	0	0	411
Montclair township	Essex	2	0	0	0	0	0	0
Newark city	Essex	2	0	0	0	0	0	0
North Caldwell borough	Essex	2	34	19	0	0	0	53
Nutley township	Essex	2	141	0	0	0	0	141
Roseland borough	Essex	2	0	49	0	0	0	49
S. Orange Village township	Essex	2	0	207	0	0	0	207
Verona township	Essex	2	0	0	0	0	0	0
West Caldwell township	Essex	2	46	51	0	0	0	97
West Orange township	Essex	2	84	0	0	0	0	84
Boonton town	Morris	2	16	0	0	0	0	16
Boonton township	Morris	2	23	10	0	0	0	33
Butler borough	Morris	2	0	0	0	0	0	0
Chatham borough	Morris	2	0	62	0	0	0	62
Chatham township	Morris	2	56	208	0	0	0	264
Chester borough	Morris	2	11	50	0	0	0	61
Chester township	Morris	2	28	8	0	0	0	36
Denville township	Morris	2	0	0	0	0	0	0
Dover town	Morris	2	99	0	0	0	0	99
East Hanover township	Morris	2	35	101	0	0	0	136
Florham Park borough	Morris	2	68	506	0	0	0	574
Hanover township	Morris	2	28	99	0	0	0	127
Harding township	Morris	2	0	107	0	0	0	107
Jefferson township	Morris	2	0	0	0	0	0	0
Kinnelon borough	Morris	2	0	28	0	0	0	28
Lincoln Park borough	Morris	2	10	26	0	0	0	36
Long Hill township	Morris	2	14	16	0	0	0	30
Madison borough	Morris	2	5	71	0	0	0	76



Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Mendham borough	Morris	2	10	33	0	0	0	43
Mendham township	Morris	2	23	68	0	0	0	91
Mine Hill township	Morris	2	0	0	0	0	0	0
Montville township	Morris	2	17	49	0	0	0	66
Morris township	Morris	2	28	294	0	0	0	322
Morris Plains borough	Morris	2	32	9	0	0	0	41
Morristown town	Morris	2	140	41	0	0	0	181
Mountain Lakes borough	Morris	2	1	47	0	0	0	48
Mount Arlington borough	Morris	2	1	0	0	0	0	1
Mount Olive township	Morris	2	0	0	0	0	0	0
Netcong borough	Morris	2	0	0	0	0	0	0
Parsippany-Troy Hills twp	Morris	2	0	0	0	0	0	0
Pequannock township	Morris	2	76	5	0	0	0	81
Randolph township	Morris	2	0	0	0	0	0	0
Riverdale borough	Morris	2	0	0	0	0	0	0
Rockaway borough	Morris	2	17	38	0	0	0	55
Rockaway township	Morris	2	0	0	0	0	0	0
Roxbury township	Morris	2	0	0	0	0	0	0
Victory Gardens borough	Morris	2	0	0	0	0	0	0
Washington township	Morris	2	10	7	0	0	0	17
Wharton borough	Morris	2	85	0	0	0	0	85
Berkeley Heights township	Union	2	9	193	0	0	0	202
Clark township	Union	2	37	122	0	0	0	159
Cranford township	Union	2	98	64	0	0	0	162
Elizabeth city	Union	2	4,247	0	0	0	(3,247)	1,000
Fanwood borough	Union	2	17	20	0	0	0	37
Garwood borough	Union	2	40	56	0	0	0	96
Hillside township	Union	2	203	0	0	0	0	203
Kenilworth borough	Union	2	0	58	0	0	0	58
Linden city	Union	2	470	117	0	0	0	587
Mountainside borough	Union	2	138	4	0	0	0	142
New Providence borough	Union	2	63	31	0	0	0	94
Plainfield city	Union	2	403	0	0	0	0	403
Rahway city	Union	2	115	98	0	0	0	213
Roselle borough	Union	2	108	0	0	0	0	108
Roselle Park borough	Union	2	81	88	0	0	0	169
Scotch Plains township	Union	2	101	85	0	0	0	186
Springfield township	Union	2	0	78	0	0	0	78
Summit city	Union	2	172	127	0	0	0	299
Union township	Union	2	410	203	0	0	0	613
Westfield town	Union	2	76	140	0	0	0	216

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Winfield township	Union	2	22	7	0	0	0	29
Allamuchy township	Warren	2	55	19	0	0	0	74
Alpha borough	Warren	2	7	0	0	0	0	7
Belvidere town	Warren	2	1	0	0	0	0	1
Blairstown township	Warren	2	0	3	0	0	0	3
Franklin township	Warren	2	0	4	0	0	0	4
Frelinghuysen township	Warren	2	0	51	0	0	0	51
Greenwich township	Warren	2	0	24	0	0	0	24
Hackettstown town	Warren	2	135	90	0	0	0	225
Hardwick township	Warren	2	0	0	0	0	0	0
Harmony township	Warren	2	0	0	0	0	0	0
Hope township	Warren	2	0	0	0	0	0	0
Independence township	Warren	2	0	0	0	0	0	0
Knowlton township	Warren	2	0	0	0	0	0	0
Liberty township	Warren	2	0	0	0	0	0	0
Lopatcong township	Warren	2	0	0	0	0	0	0
Mansfield township	Warren	2	20	100	0	0	0	120
Oxford township	Warren	2	0	0	0	0	0	0
Phillipsburg town	Warren	2	0	0	0	0	0	0
Pohatcong township	Warren	2	8	0	0	0	0	8
Washington borough	Warren	2	0	0	0	0	0	0
Washington township	Warren	2	0	0	0	0	0	0
White township	Warren	2	60	51	0	0	0	111
Alexandria township	Hunterdon	3	25	0	54	0	0	79
Bethlehem township	Hunterdon	3	0	0	42	0	0	42
Bloomsbury borough	Hunterdon	3	0	0	26	0	0	26
Califon borough	Hunterdon	3	0	0	1	0	0	1
Clinton town	Hunterdon	3	0	0	0	0	0	0
Clinton township	Hunterdon	3	0	0	0	0	0	0
Delaware township	Hunterdon	3	20	0	2	0	0	22
East Amwell township	Hunterdon	3	0	0	9	0	0	9
Flemington borough	Hunterdon	3	77	43	0	0	0	120
Franklin township	Hunterdon	3	0	59	244	(66)	0	237
Frenchtown borough	Hunterdon	3	0	0	0	0	0	0
Glen Gardner borough	Hunterdon	3	0	0	0	0	0	0
Hampton borough	Hunterdon	3	0	0	0	0	0	0
High Bridge borough	Hunterdon	3	0	0	0	0	0	0
Holland township	Hunterdon	3	45	0	0	0	0	45
Kingwood township	Hunterdon	3	0	0	13	0	0	13
Lambertville city	Hunterdon	3	58	0	0	0	0	58
Lebanon borough	Hunterdon	3	0	0	0	0	0	0

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Lebanon township	Hunterdon	3	0	0	0	0	0	0
Milford borough	Hunterdon	3	0	0	0	0	0	0
Raritan township	Hunterdon	3	34	13	44	0	0	91
Readington township	Hunterdon	3	130	153	191	0	0	474
Stockton borough	Hunterdon	3	0	0	0	0	0	0
Tewksbury township	Hunterdon	3	0	42	23	0	0	65
Union township	Hunterdon	3	1	207	453	(291)	0	370
West Amwell township	Hunterdon	3	0	19	52	0	0	71
Carteret borough	Middlesex	3	117	196	465	0	0	778
Cranbury township	Middlesex	3	3	81	186	(17)	0	253
Dunellen borough	Middlesex	3	1	61	141	0	0	203
East Brunswick township	Middlesex	3	90	417	1,121	0	(628)	1,000
Edison township	Middlesex	3	647	659	2,664	0	(2,970)	1,000
Helmetta borough	Middlesex	3	0	0	40	0	0	40
Highland Park borough	Middlesex	3	79	433	490	0	(2)	1,000
Jamesburg borough	Middlesex	3	37	104	196	0	0	337
Metuchen borough	Middlesex	3	81	118	590	0	0	789
Middlesex borough	Middlesex	3	77	178	302	0	0	557
Milltown borough	Middlesex	3	39	31	160	0	0	230
Monroe township	Middlesex	3	106	1,546	3,170	(1,080)	(2,742)	1,000
New Brunswick city	Middlesex	3	1,539	26	784	0	(1,349)	1,000
North Brunswick township	Middlesex	3	223	218	888	0	(329)	1,000
Old Bridge township	Middlesex	3	210	500	1,658	0	(1,368)	1,000
Perth Amboy city	Middlesex	3	455	0	222	0	0	677
Piscataway township	Middlesex	3	317	277	920	0	(514)	1,000
Plainsboro township	Middlesex	3	6	539	801	0	(346)	1,000
Sayreville borough	Middlesex	3	150	267	1,134	0	(551)	1,000
South Amboy city	Middlesex	3	41	16	245	0	0	302
South Brunswick township	Middlesex	3	130	237	1,124	0	(491)	1,000
South Plainfield borough	Middlesex	3	56	305	665	0	(26)	1,000
South River borough	Middlesex	3	175	173	367	0	0	715
Spotswood borough	Middlesex	3	12	100	207	0	0	319
Woodbridge township	Middlesex	3	417	775	2,373	0	(2,565)	1,000
Bedminster township	Somerset	3	1	97	232	0	0	330
Bernards township	Somerset	3	34	411	701	0	(146)	1,000
Bernardsville borough	Somerset	3	0	69	142	0	0	211
Bound Brook borough	Somerset	3	0	0	0	0	0	0
Branchburg township	Somerset	3	2	25	302	0	0	329
Bridgewater township	Somerset	3	126	76	696	0	0	898
Far Hills borough	Somerset	3	2	19	41	0	0	62
Franklin township	Somerset	3	0	0	23	0	0	23

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Green Brook township	Somerset	3	4	0	171	0	0	175
Hillsborough township	Somerset	3	57	0	258	0	0	315
Manville borough	Somerset	3	169	0	51	0	0	220
Millstone borough	Somerset	3	0	47	31	(47)	0	31
Montgomery township	Somerset	3	76	157	150	0	0	383
North Plainfield borough	Somerset	3	50	0	105	0	0	155
Peapack & Gladstone bor.	Somerset	3	0	0	148	0	0	148
Raritan borough	Somerset	3	41	83	73	0	0	197
Rocky Hill borough	Somerset	3	0	17	39	(8)	0	48
Somerville borough	Somerset	3	109	14	0	0	0	123
South Bound Brook borough	Somerset	3	0	0	0	0	0	0
Warren township	Somerset	3	59	173	311	0	0	543
Watchung borough	Somerset	3	19	101	232	0	0	352
East Windsor township	Mercer	4	65	20	285	0	0	370
Ewing township	Mercer	4	128	101	379	0	0	608
Hamilton township	Mercer	4	539	358	731	0	(628)	1,000
Hightstown borough	Mercer	4	16	0	47	0	0	63
Hopewell borough	Mercer	4	18	16	33	0	0	67
Hopewell township	Mercer	4	0	102	321	0	0	423
Lawrence township	Mercer	4	60	58	226	0	0	344
Pennington borough	Mercer	4	55	0	52	0	0	107
Princeton	Mercer	4	91	98	222	0	0	411
Robbinsville township	Mercer	4	20	64	237	0	0	321
Trenton city	Mercer	4	73	0	0	0	0	73
West Windsor township	Mercer	4	105	0	0	0	0	105
Aberdeen township	Monmouth	4	0	0	0	0	0	0
Allenhurst borough	Monmouth	4	4	6	13	0	0	23
Allentown borough	Monmouth	4	0	0	0	0	0	0
Asbury Park city	Monmouth	4	260	28	0	0	0	288
Atlantic Highlands borough	Monmouth	4	62	0	10	0	0	72
Avon-by-the-Sea borough	Monmouth	4	0	20	50	0	0	70
Belmar borough	Monmouth	4	54	100	167	0	0	321
Bradley Beach borough	Monmouth	4	13	51	92	0	0	156
Brielle borough	Monmouth	4	11	6	82	0	0	99
Colts Neck township	Monmouth	4	14	16	5	0	0	35
Deal borough	Monmouth	4	2	14	30	0	0	46
Eatontown borough	Monmouth	4	116	34	54	0	0	204
Englishtown borough	Monmouth	4	0	0	0	0	0	0
Fair Haven borough	Monmouth	4	0	27	54	0	0	81
Farmingdale borough	Monmouth	4	2	9	3	0	0	14
Freehold borough	Monmouth	4	78	0	0	0	0	78

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Freehold township	Monmouth	4	0	0	16	0	0	16
Hazlet township	Monmouth	4	0	0	0	0	0	0
Highlands borough	Monmouth	4	0	0	0	0	0	0
Holmdel township	Monmouth	4	19	0	18	0	0	37
Howell township	Monmouth	4	0	0	0	0	0	0
Interlaken borough	Monmouth	4	3	7	20	0	0	30
Keansburg borough	Monmouth	4	0	0	0	0	0	0
Keyport borough	Monmouth	4	0	0	0	0	0	0
Lake Como borough	Monmouth	4	3	51	14	0	0	68
Little Silver borough	Monmouth	4	7	10	0	0	0	17
Loch Arbour village	Monmouth	4	0	8	14	(6)	0	16
Long Branch city	Monmouth	4	311	299	198	0	0	808
Manalapan township	Monmouth	4	0	0	0	0	0	0
Manasquan borough	Monmouth	4	0	59	154	0	0	213
Marlboro township	Monmouth	4	0	0	0	0	0	0
Matawan borough	Monmouth	4	0	0	0	0	0	0
Middletown township	Monmouth	4	0	0	0	0	0	0
Millstone township	Monmouth	4	0	0	15	0	0	15
Monmouth Beach borough	Monmouth	4	0	32	76	0	0	108
Neptune township	Monmouth	4	73	0	62	0	0	135
Neptune City borough	Monmouth	4	13	27	0	0	0	40
Ocean township	Monmouth	4	81	19	75	0	0	175
Oceanport borough	Monmouth	4	0	22	60	0	0	82
Red Bank borough	Monmouth	4	126	0	99	0	0	225
Roosevelt borough	Monmouth	4	0	0	0	0	0	0
Rumson borough	Monmouth	4	26	67	112	0	0	205
Sea Bright borough	Monmouth	4	11	23	40	0	0	74
Sea Girt borough	Monmouth	4	0	45	65	0	0	110
Shrewsbury borough	Monmouth	4	10	20	47	0	0	77
Shrewsbury township	Monmouth	4	0	0	0	0	0	0
Spring Lake borough	Monmouth	4	12	41	65	0	0	118
Spring Lake Heights bor.	Monmouth	4	20	65	119	0	0	204
Tinton Falls borough	Monmouth	4	7	0	0	0	0	7
Union Beach borough	Monmouth	4	0	0	0	0	0	0
Upper Freehold township	Monmouth	4	23	0	51	0	0	74
Wall township	Monmouth	4	105	78	237	0	0	420
West Long Branch borough	Monmouth	4	14	18	27	0	0	59
Barnegat township	Ocean	4	63	7	96	0	0	166
Barnegat Light borough	Ocean	4	12	0	27	0	0	39
Bay Head borough	Ocean	4	1	12	26	0	0	39
Beach Haven borough	Ocean	4	3	27	121	(45)	0	106

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Beachwood borough	Ocean	4	0	0	0	0	0	0
Berkeley township	Ocean	4	0	0	0	0	0	0
Brick township	Ocean	4	262	0	192	0	0	454
Eagleswood township	Ocean	4	0	5	31	0	0	36
Harvey Cedars borough	Ocean	4	3	4	18	0	0	25
Island Heights borough	Ocean	4	3	23	25	0	0	51
Jackson township	Ocean	4	56	74	333	0	0	463
Lacey township	Ocean	4	48	0	35	0	0	83
Lakehurst borough	Ocean	4	0	0	0	0	0	0
Lakewood township	Ocean	4	533	412	353	0	(298)	1,000
Lavallette borough	Ocean	4	0	33	111	0	0	144
Little Egg Harbor township	Ocean	4	0	0	19	0	0	19
Long Beach township	Ocean	4	16	65	268	(63)	0	286
Manchester township	Ocean	4	0	0	0	0	0	0
Mantoloking borough	Ocean	4	0	19	29	(28)	0	20
Ocean township	Ocean	4	6	74	77	0	0	157
Ocean Gate borough	Ocean	4	0	0	0	0	0	0
Pine Beach borough	Ocean	4	0	0	10	0	0	10
Plumsted township	Ocean	4	14	44	47	0	0	105
Point Pleasant borough	Ocean	4	11	80	181	0	0	272
Point Pleasant Beach bor.	Ocean	4	36	64	236	0	0	336
Seaside Heights borough	Ocean	4	79	0	0	0	0	79
Seaside Park borough	Ocean	4	30	19	145	(35)	0	159
Ship Bottom borough	Ocean	4	0	57	123	(85)	0	95
South Toms River borough	Ocean	4	0	0	0	0	0	0
Stafford township	Ocean	4	114	0	246	0	0	360
Surf City borough	Ocean	4	3	22	103	(3)	0	125
Toms River township	Ocean	4	296	111	665	0	(72)	1,000
Tuckerton borough	Ocean	4	0	0	14	0	0	14
Bass River township	Burlington	5	0	1	16	0	0	17
Beverly city	Burlington	5	0	0	0	0	0	0
Bordentown city	Burlington	5	19	0	0	0	0	19
Bordentown township	Burlington	5	0	0	222	0	0	222
Burlington city	Burlington	5	0	0	0	0	0	0
Burlington township	Burlington	5	27	108	608	0	0	743
Chesterfield township	Burlington	5	7	0	0	0	0	7
Cinnaminson township	Burlington	5	9	32	100	0	0	141
Delanco township	Burlington	5	0	0	0	0	0	0
Delran township	Burlington	5	0	0	261	0	0	261
Eastampton township	Burlington	5	0	140	193	0	0	333
Edgewater Park township	Burlington	5	2	0	0	0	0	2

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Evesham township	Burlington	5	80	126	859	0	(65)	1,000
Fieldsboro borough	Burlington	5	0	0	8	0	0	8
Florence township	Burlington	5	45	0	38	0	0	83
Hainesport township	Burlington	5	0	74	277	0	0	351
Lumberton township	Burlington	5	0	0	508	0	0	508
Mansfield township	Burlington	5	0	0	337	0	0	337
Maple Shade township	Burlington	5	0	0	0	0	0	0
Medford township	Burlington	5	14	131	503	0	0	648
Medford Lakes borough	Burlington	5	0	0	65	0	0	65
Moorestown township	Burlington	5	27	151	527	0	0	705
Mount Holly township	Burlington	5	13	29	91	0	0	133
Mount Laurel township	Burlington	5	50	116	495	0	0	661
New Hanover township	Burlington	5	0	220	172	(240)	0	152
North Hanover township	Burlington	5	0	242	199	0	0	441
Palmyra borough	Burlington	5	0	0	0	0	0	0
Pemberton borough	Burlington	5	0	42	31	0	0	73
Pemberton township	Burlington	5	0	0	0	0	0	0
Riverside township	Burlington	5	0	0	0	0	0	0
Riverton borough	Burlington	5	0	16	69	0	0	85
Shamong township	Burlington	5	25	46	146	0	0	217
Southampton township	Burlington	5	25	17	154	0	0	196
Springfield township	Burlington	5	3	13	95	0	0	111
Tabernacle township	Burlington	5	0	34	137	0	0	171
Washington township	Burlington	5	0	0	11	0	0	11
Westampton township	Burlington	5	0	0	295	0	0	295
Willingboro township	Burlington	5	0	0	0	0	0	0
Woodland township	Burlington	5	2	38	74	(6)	0	108
Wrightstown borough	Burlington	5	0	0	28	0	0	28
Audubon borough	Camden	5	61	70	135	0	0	266
Audubon Park borough	Camden	5	0	8	15	0	0	23
Barrington borough	Camden	5	20	119	195	0	0	334
Bellmawr borough	Camden	5	31	107	100	0	0	238
Berlin borough	Camden	5	43	97	235	0	0	375
Berlin township	Camden	5	46	130	208	0	0	384
Brooklawn borough	Camden	5	0	0	26	0	0	26
Camden city	Camden	5	269	0	0	0	0	269
Cherry Hill township	Camden	5	325	581	1,765	0	(1,671)	1,000
Chesilhurst borough	Camden	5	7	0	45	0	0	52
Clementon borough	Camden	5	61	10	54	0	0	125
Collingswood borough	Camden	5	51	355	310	0	0	716
Gibbsboro borough	Camden	5	25	18	70	0	0	113

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Gloucester township	Camden	5	117	120	967	0	(204)	1,000
Gloucester City	Camden	5	0	0	0	0	0	0
Haddon township	Camden	5	46	197	352	0	0	595
Haddonfield borough	Camden	5	10	88	482	0	0	580
Haddon Heights borough	Camden	5	19	88	214	0	0	321
Hi-Nella borough	Camden	5	0	0	4	0	0	4
Laurel Springs borough	Camden	5	0	0	36	0	0	36
Lawnside borough	Camden	5	0	0	50	0	0	50
Lindenwold borough	Camden	5	0	0	0	0	0	0
Magnolia borough	Camden	5	18	25	66	0	0	109
Merchantville borough	Camden	5	0	70	55	0	0	125
Mount Ephraim borough	Camden	5	0	0	49	0	0	49
Oaklyn borough	Camden	5	13	43	81	0	0	137
Pennsauken township	Camden	5	167	23	302	0	0	492
Pine Hill borough	Camden	5	11	21	126	0	0	158
Pine Valley borough	Camden	5	0	13	23	(36)	0	0
Runnemede borough	Camden	5	33	79	129	0	0	241
Somerdale borough	Camden	5	0	217	89	0	0	306
Stratford borough	Camden	5	15	46	79	0	0	140
Tavistock borough	Camden	5	0	4	8	(12)	0	0
Voorhees township	Camden	5	239	305	912	0	(456)	1,000
Waterford township	Camden	5	0	132	167	0	0	299
Winslow township	Camden	5	51	248	1,017	0	(316)	1,000
Woodlynne borough	Camden	5	0	0	0	0	0	0
Clayton borough	Gloucester	5	44	114	119	0	0	277
Deptford township	Gloucester	5	87	243	648	0	0	978
East Greenwich township	Gloucester	5	6	0	30	0	0	36
Elk township	Gloucester	5	4	57	184	0	0	245
Franklin township	Gloucester	5	51	116	317	0	0	484
Glassboro borough	Gloucester	5	13	376	616	0	(5)	1,000
Greenwich township	Gloucester	5	0	44	93	0	0	137
Harrison township	Gloucester	5	0	64	527	0	0	591
Logan township	Gloucester	5	0	198	369	(131)	0	436
Mantua township	Gloucester	5	56	112	294	0	0	462
Monroe township	Gloucester	5	90	215	775	0	(80)	1,000
National Park borough	Gloucester	5	6	10	19	0	0	35
Newfield borough	Gloucester	5	0	0	22	0	0	22
Paulsboro borough	Gloucester	5	62	0	25	0	0	87
Pitman borough	Gloucester	5	36	14	75	0	0	125
South Harrison township	Gloucester	5	0	30	110	0	0	140
Swedesboro borough	Gloucester	5	22	21	0	0	0	43

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
Washington township	Gloucester	5	173	146	771	0	(90)	1,000
Wenonah borough	Gloucester	5	0	1	49	0	0	50
West Deptford township	Gloucester	5	15	247	410	0	0	672
Westville borough	Gloucester	5	0	0	19	0	0	19
Woodbury city	Gloucester	5	16	57	124	0	0	197
Woodbury Heights borough	Gloucester	5	5	0	57	0	0	62
Woolwich township	Gloucester	5	0	0	0	0	0	0
Absecon city	Atlantic	6	0	0	0	0	0	0
Atlantic City	Atlantic	6	0	0	0	0	0	0
Brigantine city	Atlantic	6	0	0	156	0	0	156
Buena borough	Atlantic	6	0	0	0	0	0	0
Buena Vista township	Atlantic	6	0	0	0	0	0	0
Corbin City	Atlantic	6	0	0	0	0	0	0
Egg Harbor township	Atlantic	6	0	0	26	0	0	26
Egg Harbor City	Atlantic	6	0	0	0	0	0	0
Estell Manor city	Atlantic	6	0	0	0	0	0	0
Folsom borough	Atlantic	6	0	0	0	0	0	0
Galloway township	Atlantic	6	0	0	0	0	0	0
Hamilton township	Atlantic	6	0	0	51	0	0	51
Hammonton town	Atlantic	6	0	0	0	0	0	0
Linwood city	Atlantic	6	0	0	12	0	0	12
Longport borough	Atlantic	6	0	0	20	0	0	20
Margate City	Atlantic	6	0	0	104	0	0	104
Mullica township	Atlantic	6	0	0	0	0	0	0
Northfield city	Atlantic	6	0	0	2	0	0	2
Pleasantville city	Atlantic	6	0	0	0	0	0	0
Port Republic city	Atlantic	6	0	0	3	0	0	3
Somers Point city	Atlantic	6	0	0	3	0	0	3
Ventnor City	Atlantic	6	0	0	33	0	0	33
Weymouth township	Atlantic	6	0	0	0	0	0	0
Avalon borough	Cape May	6	0	0	59	0	0	59
Cape May city	Cape May	6	0	0	16	0	0	16
Cape May Point borough	Cape May	6	0	0	4	0	0	4
Dennis township	Cape May	6	0	0	0	0	0	0
Lower township	Cape May	6	0	0	0	0	0	0
Middle township	Cape May	6	0	0	0	0	0	0
North Wildwood city	Cape May	6	0	0	0	0	0	0
Ocean City	Cape May	6	0	0	168	0	0	168
Sea Isle City	Cape May	6	0	0	65	0	0	65
Stone Harbor borough	Cape May	6	0	0	22	0	0	22
Upper township	Cape May	6	0	0	0	0	0	0

Municipality	County	Reg.	Pre-Cap Present Need	Pre-Cap Prospective Need	Pre-Cap Gap Allocation	Capped Units (20% Cap)	Capped Units (1,000 Unit Cap)	Total Present, Prospective & Gap Allocation
West Cape May borough	Cape May	6	0	0	0	0	0	0
West Wildwood borough	Cape May	6	0	0	0	0	0	0
Wildwood city	Cape May	6	0	0	0	0	0	0
Wildwood Crest borough	Cape May	6	0	0	0	0	0	0
Woodbine borough	Cape May	6	0	0	0	0	0	0
Bridgeton city	Cumberland	6	0	0	0	0	0	0
Commercial township	Cumberland	6	0	0	0	0	0	0
Deerfield township	Cumberland	6	0	0	6	0	0	6
Downe township	Cumberland	6	0	0	4	0	0	4
Fairfield township	Cumberland	6	0	0	11	0	0	11
Greenwich township	Cumberland	6	0	0	1	0	0	1
Hopewell township	Cumberland	6	0	0	8	0	0	8
Lawrence township	Cumberland	6	0	0	0	0	0	0
Maurice River township	Cumberland	6	0	0	5	0	0	5
Millville city	Cumberland	6	0	0	21	0	0	21
Shiloh borough	Cumberland	6	0	0	1	0	0	1
Stow Creek township	Cumberland	6	0	0	1	0	0	1
Upper Deerfield township	Cumberland	6	0	0	26	0	0	26
Vineland city	Cumberland	6	0	0	37	0	0	37
Alloway township	Salem	6	0	0	1	0	0	1
Carneys Point township	Salem	6	0	0	14	0	0	14
Elmer borough	Salem	6	0	0	4	0	0	4
Elsinboro township	Salem	6	0	0	1	0	0	1
Lower Alloways Creek twp	Salem	6	0	0	8	0	0	8
Mannington township	Salem	6	0	0	4	0	0	4
Oldmans township	Salem	6	0	0	12	0	0	12
Penns Grove borough	Salem	6	0	0	0	0	0	0
Pennsville township	Salem	6	0	0	5	0	0	5
Pilesgrove township	Salem	6	0	0	15	0	0	15
Pittsgrove township	Salem	6	0	0	8	0	0	8
Quinton township	Salem	6	0	0	0	0	0	0
Salem city	Salem	6	0	0	0	0	0	0
Upper Pittsgrove township	Salem	6	0	0	5	0	0	5
Woodstown borough	Salem	6	0	0	7	0	0	7

APPENDIX E: MUNICIPAL SUMMARY ALLOCATIONS

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Allendale borough	Bergen	1	137	14	81	0	232
Alpine borough	Bergen	1	214	2	127	0	343
Bergenfield borough	Bergen	1	87	60	0	0	147
Bogota borough	Bergen	1	13	0	0	0	13
Carlstadt borough	Bergen	1	227	32	89	0	348
Cliffside Park borough	Bergen	1	28	11	0	0	39
Closter borough	Bergen	1	110	0	126	0	236
Cresskill borough	Bergen	1	70	40	290	0	400
Demarest borough	Bergen	1	66	0	106	0	172
Dumont borough	Bergen	1	33	3	0	0	36
East Rutherford borough	Bergen	1	90	175	12	0	277
Edgewater borough	Bergen	1	28	0	213	0	241
Elmwood Park borough	Bergen	1	54	40	7	0	101
Emerson borough	Bergen	1	74	53	64	0	191
Englewood city	Bergen	1	152	247	0	0	399
Englewood Cliffs borough	Bergen	1	219	0	294	0	513
Fair Lawn borough	Bergen	1	152	108	0	0	260
Fairview borough	Bergen	1	20	115	0	0	135
Fort Lee borough	Bergen	1	181	248	158	0	587
Franklin Lakes borough	Bergen	1	358	30	377	0	765
Garfield city	Bergen	1	0	0	0	0	0
Glen Rock borough	Bergen	1	118	13	48	0	179
Hackensack city	Bergen	1	201	0	0	0	201
Harrington Park borough	Bergen	1	56	4	104	0	164
Hasbrouck Heights borough	Bergen	1	58	64	262	0	384
Haworth borough	Bergen	1	64	0	43	0	107
Hillsdale borough	Bergen	1	111	13	80	0	204
Ho-Ho-Kus borough	Bergen	1	83	10	100	0	193
Leonia borough	Bergen	1	30	71	124	0	225
Little Ferry borough	Bergen	1	28	23	0	0	51
Lodi borough	Bergen	1	0	63	0	0	63
Lyndhurst township	Bergen	1	100	151	0	0	251
Mahwah township	Bergen	1	350	64	86	0	500
Maywood borough	Bergen	1	36	25	3	0	64
Midland Park borough	Bergen	1	54	23	34	0	111
Montvale borough	Bergen	1	255	2	303	0	560
Moonachie borough	Bergen	1	95	28	35	0	158
New Milford borough	Bergen	1	23	36	8	0	67
North Arlington borough	Bergen	1	4	67	0	0	71
Northvale borough	Bergen	1	86	3	53	0	142

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Norwood borough	Bergen	1	118	0	71	0	189
Oakland borough	Bergen	1	220	24	29	0	273
Old Tappan borough	Bergen	1	98	9	257	0	364
Oradell borough	Bergen	1	89	14	18	0	121
Palisades Park borough	Bergen	1	0	125	80	0	205
Paramus borough	Bergen	1	698	133	529	0	1,360
Park Ridge borough	Bergen	1	111	108	66	0	285
Ramsey borough	Bergen	1	189	50	86	0	325
Ridgefield borough	Bergen	1	47	133	74	0	254
Ridgefield Park village	Bergen	1	25	29	0	0	54
Ridgewood village	Bergen	1	229	4	244	0	477
River Edge borough	Bergen	1	73	24	0	0	97
River Vale township	Bergen	1	121	19	78	0	218
Rochelle Park township	Bergen	1	63	0	17	0	80
Rockleigh borough	Bergen	1	84	0	14	0	98
Rutherford borough	Bergen	1	95	159	115	0	369
Saddle Brook township	Bergen	1	127	36	8	0	171
Saddle River borough	Bergen	1	162	43	214	0	419
South Hackensack township	Bergen	1	50	55	48	0	153
Teaneck township	Bergen	1	192	79	390	0	661
Tenafly borough	Bergen	1	159	21	202	0	382
Teterboro borough	Bergen	1	106	0	6	0	112
Upper Saddle River borough	Bergen	1	206	7	308	0	521
Waldwick borough	Bergen	1	81	41	0	0	122
Wallington borough	Bergen	1	5	0	0	0	5
Washington township	Bergen	1	85	0	156	0	241
Westwood borough	Bergen	1	87	50	23	0	160
Woodcliff Lake borough	Bergen	1	170	16	257	0	443
Wood-Ridge borough	Bergen	1	38	0	0	0	38
Wyckoff township	Bergen	1	221	31	225	0	477
Bayonne city	Hudson	1	0	1,000	0	0	1,000
East Newark borough	Hudson	1	3	8	20	0	31
Guttenberg town	Hudson	1	23	0	0	0	23
Harrison town	Hudson	1	30	248	397	0	675
Hoboken city	Hudson	1	0	0	0	0	0
Jersey City	Hudson	1	0	4,372	1,211	0	5,583
Kearny town	Hudson	1	211	227	481	0	919
North Bergen township	Hudson	1	0	793	134	0	927
Secaucus town	Hudson	1	590	54	399	0	1,043
Union City	Hudson	1	0	1,000	0	0	1,000
Weehawken township	Hudson	1	3	54	0	0	57
West New York town	Hudson	1	0	405	0	0	405

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Bloomingtondale borough	Passaic	1	168	56	0	0	224
Clifton city	Passaic	1	379	1,000	0	0	1,379
Haledon borough	Passaic	1	5	0	0	0	5
Hawthorne borough	Passaic	1	58	34	0	0	92
Little Falls township	Passaic	1	101	152	42	0	295
North Haledon borough	Passaic	1	92	0	115	0	207
Passaic city	Passaic	1	0	1,000	0	0	1,000
Paterson city	Passaic	1	0	1,000	0	0	1,000
Pompton Lakes borough	Passaic	1	102	0	0	0	102
Prospect Park borough	Passaic	1	0	0	0	0	0
Ringwood borough	Passaic	1	51	0	0	0	51
Totowa borough	Passaic	1	247	137	147	0	531
Wanaque borough	Passaic	1	332	4	0	0	336
Wayne township	Passaic	1	1,158	272	567	0	1,997
West Milford township	Passaic	1	98	0	0	0	98
Woodland Park borough	Passaic	1	146	246	116	0	508
Andover borough	Sussex	1	7	0	0	0	7
Andover township	Sussex	1	55	7	183	0	245
Branchville borough	Sussex	1	13	1	75	0	89
Byram township	Sussex	1	33	28	43	0	104
Frankford township	Sussex	1	36	31	49	0	116
Franklin borough	Sussex	1	9	1	0	0	10
Fredon township	Sussex	1	29	23	99	0	151
Green township	Sussex	1	20	0	0	0	20
Hamburg borough	Sussex	1	14	0	0	0	14
Hampton township	Sussex	1	44	8	35	0	87
Hardyston township	Sussex	1	18	20	399	0	437
Hopatcong borough	Sussex	1	93	0	0	0	93
Lafayette township	Sussex	1	27	0	89	0	116
Montague township	Sussex	1	9	0	0	0	9
Newton town	Sussex	1	24	172	131	0	327
Ogdensburg borough	Sussex	1	13	0	0	0	13
Sandyston township	Sussex	1	13	0	0	0	13
Sparta township	Sussex	1	76	0	0	0	76
Stanhope borough	Sussex	1	15	0	0	0	15
Stillwater township	Sussex	1	15	0	23	0	38
Sussex borough	Sussex	1	0	0	0	0	0
Vernon township	Sussex	1	60	43	8	0	111
Walpack township	Sussex	1	0	0	0	0	0
Wantage township	Sussex	1	35	0	0	0	35
Belleville township	Essex	2	0	101	0	0	101
Bloomfield township	Essex	2	0	0	0	0	0

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Caldwell borough	Essex	2	0	14	7	0	21
Cedar Grove township	Essex	2	70	15	24	0	109
City of Orange township	Essex	2	0	38	0	0	38
East Orange city	Essex	2	0	0	0	0	0
Essex Fells borough	Essex	2	40	0	38	0	78
Fairfield township	Essex	2	318	45	71	0	434
Glen Ridge borough	Essex	2	28	0	0	0	28
Irvington township	Essex	2	0	0	0	0	0
Livingston township	Essex	2	375	14	80	0	469
Maplewood township	Essex	2	51	0	0	0	51
Millburn township	Essex	2	261	137	274	0	672
Montclair township	Essex	2	0	0	0	0	0
Newark city	Essex	2	0	0	0	0	0
North Caldwell borough	Essex	2	63	34	19	0	116
Nutley township	Essex	2	29	141	0	0	170
Roseland borough	Essex	2	182	0	49	0	231
S. Orange Village township	Essex	2	63	0	207	0	270
Verona township	Essex	2	24	0	0	0	24
West Caldwell township	Essex	2	200	46	51	0	297
West Orange township	Essex	2	226	84	0	0	310
Boonton town	Morris	2	11	16	0	0	27
Boonton township	Morris	2	20	23	10	0	53
Butler borough	Morris	2	16	0	0	0	16
Chatham borough	Morris	2	77	0	62	0	139
Chatham township	Morris	2	83	56	208	0	347
Chester borough	Morris	2	16	11	50	0	77
Chester township	Morris	2	32	28	8	0	68
Denville township	Morris	2	325	0	0	0	325
Dover town	Morris	2	6	99	0	0	105
East Hanover township	Morris	2	262	35	101	0	398
Florham Park borough	Morris	2	326	68	506	0	900
Hanover township	Morris	2	356	28	99	0	483
Harding township	Morris	2	83	0	107	0	190
Jefferson township	Morris	2	69	0	0	0	69
Kinnelon borough	Morris	2	73	0	28	0	101
Lincoln Park borough	Morris	2	74	10	26	0	110
Long Hill township	Morris	2	62	14	16	0	92
Madison borough	Morris	2	86	5	71	0	162
Mendham borough	Morris	2	25	10	33	0	68
Mendham township	Morris	2	41	23	68	0	132
Mine Hill township	Morris	2	61	0	0	0	61
Montville township	Morris	2	261	17	49	0	327

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Morris township	Morris	2	293	28	294	0	615
Morris Plains borough	Morris	2	144	32	9	0	185
Morristown town	Morris	2	227	140	41	0	408
Mountain Lakes borough	Morris	2	80	1	47	0	128
Mount Arlington borough	Morris	2	17	1	0	0	18
Mount Olive township	Morris	2	45	0	0	0	45
Netcong borough	Morris	2	0	0	0	0	0
Parsippany-Troy Hills twp	Morris	2	663	0	0	0	663
Pequannock township	Morris	2	134	76	5	0	215
Randolph township	Morris	2	261	0	0	0	261
Riverdale borough	Morris	2	58	0	0	0	58
Rockaway borough	Morris	2	43	17	38	0	98
Rockaway township	Morris	2	370	0	0	0	370
Roxbury township	Morris	2	255	0	0	0	255
Victory Gardens borough	Morris	2	0	0	0	0	0
Washington township	Morris	2	66	10	7	0	83
Wharton borough	Morris	2	42	85	0	0	127
Berkeley Heights township	Union	2	183	9	193	0	385
Clark township	Union	2	92	37	122	0	251
Cranford township	Union	2	148	98	64	0	310
Elizabeth city	Union	2	0	1,000	0	0	1,000
Fanwood borough	Union	2	45	17	20	0	82
Garwood borough	Union	2	18	40	56	0	114
Hillside township	Union	2	0	203	0	0	203
Kenilworth borough	Union	2	83	0	58	0	141
Linden city	Union	2	209	470	117	0	796
Mountainside borough	Union	2	123	138	4	0	265
New Providence borough	Union	2	135	63	31	0	229
Plainfield city	Union	2	0	403	0	0	403
Rahway city	Union	2	70	115	98	0	283
Roselle borough	Union	2	0	108	0	0	108
Roselle Park borough	Union	2	0	81	88	0	169
Scotch Plains township	Union	2	182	101	85	0	368
Springfield township	Union	2	135	0	78	0	213
Summit city	Union	2	171	172	127	0	470
Union township	Union	2	234	410	203	0	847
Westfield town	Union	2	139	76	140	0	355
Winfield township	Union	2	0	22	7	0	29
Allamuchy township	Warren	2	13	55	19	0	87
Alpha borough	Warren	2	13	7	0	0	20
Belvidere town	Warren	2	0	1	0	0	1
Blairstown township	Warren	2	12	0	3	0	15

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Franklin township	Warren	2	11	0	4	0	15
Frelinghuysen township	Warren	2	6	0	51	0	57
Greenwich township	Warren	2	41	0	24	0	65
Hackettstown town	Warren	2	62	135	90	0	287
Hardwick township	Warren	2	6	0	0	0	6
Harmony township	Warren	2	47	0	0	0	47
Hope township	Warren	2	8	0	0	0	8
Independence township	Warren	2	10	0	0	0	10
Knowlton township	Warren	2	14	0	0	0	14
Liberty township	Warren	2	7	0	0	0	7
Lopatcong township	Warren	2	56	0	0	0	56
Mansfield township	Warren	2	3	20	100	0	123
Oxford township	Warren	2	2	0	0	0	2
Phillipsburg town	Warren	2	0	0	0	0	0
Pohatcong township	Warren	2	47	8	0	0	55
Washington borough	Warren	2	0	0	0	0	0
Washington township	Warren	2	48	0	0	0	48
White township	Warren	2	16	60	51	0	127
Alexandria township	Hunterdon	3	22	25	0	54	101
Bethlehem township	Hunterdon	3	42	0	0	42	84
Bloomsbury borough	Hunterdon	3	17	0	0	26	43
Califon borough	Hunterdon	3	21	0	0	1	22
Clinton town	Hunterdon	3	51	0	0	0	51
Clinton township	Hunterdon	3	335	0	0	0	335
Delaware township	Hunterdon	3	23	20	0	2	45
East Amwell township	Hunterdon	3	40	0	0	9	49
Flemington borough	Hunterdon	3	38	77	43	0	158
Franklin township	Hunterdon	3	36	0	59	178	273
Frenchtown borough	Hunterdon	3	2	0	0	0	2
Glen Gardner borough	Hunterdon	3	7	0	0	0	7
Hampton borough	Hunterdon	3	2	0	0	0	2
High Bridge borough	Hunterdon	3	27	0	0	0	27
Holland township	Hunterdon	3	17	45	0	0	62
Kingwood township	Hunterdon	3	19	0	0	13	32
Lambertville city	Hunterdon	3	0	58	0	0	58
Lebanon borough	Hunterdon	3	34	0	0	0	34
Lebanon township	Hunterdon	3	28	0	0	0	28
Milford borough	Hunterdon	3	5	0	0	0	5
Raritan township	Hunterdon	3	360	34	13	44	451
Readington township	Hunterdon	3	394	130	153	191	868
Stockton borough	Hunterdon	3	6	0	0	0	6
Tewksbury township	Hunterdon	3	119	0	42	23	184

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Union township	Hunterdon	3	78	1	207	162	448
West Amwell township	Hunterdon	3	16	0	19	52	87
Carteret borough	Middlesex	3	0	117	196	465	778
Cranbury township	Middlesex	3	217	3	81	169	470
Dunellen borough	Middlesex	3	0	1	61	141	203
East Brunswick township	Middlesex	3	648	90	417	493	1,648
Edison township	Middlesex	3	965	341	659	0	1,965
Helmetta borough	Middlesex	3	26	0	0	40	66
Highland Park borough	Middlesex	3	0	79	433	488	1,000
Jamesburg borough	Middlesex	3	8	37	104	196	345
Metuchen borough	Middlesex	3	99	81	118	590	888
Middlesex borough	Middlesex	3	105	77	178	302	662
Milltown borough	Middlesex	3	64	39	31	160	294
Monroe township	Middlesex	3	554	(546)	1,546	0	1,554
New Brunswick city	Middlesex	3	0	974	26	0	1,000
North Brunswick township	Middlesex	3	395	223	218	559	1,395
Old Bridge township	Middlesex	3	438	210	500	290	1,438
Perth Amboy city	Middlesex	3	0	455	0	222	677
Piscataway township	Middlesex	3	736	317	277	406	1,736
Plainsboro township	Middlesex	3	205	6	539	455	1,205
Sayreville borough	Middlesex	3	261	150	267	583	1,261
South Amboy city	Middlesex	3	0	41	16	245	302
South Brunswick township	Middlesex	3	842	130	237	633	1,842
South Plainfield borough	Middlesex	3	379	56	305	639	1,379
South River borough	Middlesex	3	0	175	173	367	715
Spotswood borough	Middlesex	3	48	12	100	207	367
Woodbridge township	Middlesex	3	955	225	775	0	1,955
Bedminster township	Somerset	3	154	1	97	232	484
Bernards township	Somerset	3	508	34	411	555	1,508
Bernardsville borough	Somerset	3	127	0	69	142	338
Bound Brook borough	Somerset	3	0	0	0	0	0
Branchburg township	Somerset	3	302	2	25	302	631
Bridgewater township	Somerset	3	713	126	76	696	1,611
Far Hills borough	Somerset	3	38	2	19	41	100
Franklin township	Somerset	3	766	0	0	23	789
Green Brook township	Somerset	3	151	4	0	171	326
Hillsborough township	Somerset	3	461	57	0	258	776
Manville borough	Somerset	3	0	169	0	51	220
Millstone borough	Somerset	3	21	0	31	0	52
Montgomery township	Somerset	3	307	76	157	150	690
North Plainfield borough	Somerset	3	0	50	0	105	155
Peapack & Gladstone bor.	Somerset	3	82	0	0	148	230

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Raritan borough	Somerset	3	82	41	83	73	279
Rocky Hill borough	Somerset	3	25	0	17	31	73
Somerville borough	Somerset	3	153	109	14	0	276
South Bound Brook borough	Somerset	3	0	0	0	0	0
Warren township	Somerset	3	543	59	173	311	1,086
Watchung borough	Somerset	3	206	19	101	232	558
East Windsor township	Mercer	4	367	65	20	285	737
Ewing township	Mercer	4	481	128	101	379	1,089
Hamilton township	Mercer	4	706	539	358	103	1,706
Hightstown borough	Mercer	4	45	16	0	47	108
Hopewell borough	Mercer	4	29	18	16	33	96
Hopewell township	Mercer	4	520	0	102	321	943
Lawrence township	Mercer	4	891	60	58	226	1,235
Pennington borough	Mercer	4	52	55	0	52	159
Princeton	Mercer	4	641	91	98	222	1,052
Robbinsville township	Mercer	4	293	20	64	237	614
Trenton city	Mercer	4	0	73	0	0	73
West Windsor township	Mercer	4	899	105	0	0	1,004
Aberdeen township	Monmouth	4	270	0	0	0	270
Allenhurst borough	Monmouth	4	50	4	6	13	73
Allentown borough	Monmouth	4	28	0	0	0	28
Asbury Park city	Monmouth	4	0	260	28	0	288
Atlantic Highlands borough	Monmouth	4	86	62	0	10	158
Avon-by-the-Sea borough	Monmouth	4	20	0	20	50	90
Belmar borough	Monmouth	4	59	54	100	167	380
Bradley Beach borough	Monmouth	4	20	13	51	92	176
Brielle borough	Monmouth	4	159	11	6	82	258
Colts Neck township	Monmouth	4	218	14	16	5	253
Deal borough	Monmouth	4	54	2	14	30	100
Eatontown borough	Monmouth	4	504	116	34	54	708
Englishtown borough	Monmouth	4	65	0	0	0	65
Fair Haven borough	Monmouth	4	135	0	27	54	216
Farmingdale borough	Monmouth	4	19	2	9	3	33
Freehold borough	Monmouth	4	188	78	0	0	266
Freehold township	Monmouth	4	1,036	0	0	16	1,052
Hazlet township	Monmouth	4	407	0	0	0	407
Highlands borough	Monmouth	4	20	0	0	0	20
Holmdel township	Monmouth	4	768	19	0	18	805
Howell township	Monmouth	4	955	0	0	0	955
Interlaken borough	Monmouth	4	40	3	7	20	70
Keansburg borough	Monmouth	4	0	0	0	0	0
Keyport borough	Monmouth	4	1	0	0	0	1

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Lake Como borough	Monmouth	4	31	3	51	14	99
Little Silver borough	Monmouth	4	197	7	10	0	214
Loch Arbour village	Monmouth	4	30	0	8	8	46
Long Branch city	Monmouth	4	0	311	299	198	808
Manalapan township	Monmouth	4	706	0	0	0	706
Manasquan borough	Monmouth	4	149	0	59	154	362
Marlboro township	Monmouth	4	1,019	0	0	0	1,019
Matawan borough	Monmouth	4	141	0	0	0	141
Middletown township	Monmouth	4	1,561	0	0	0	1,561
Millstone township	Monmouth	4	81	0	0	15	96
Monmouth Beach borough	Monmouth	4	70	0	32	76	178
Neptune township	Monmouth	4	0	73	0	62	135
Neptune City borough	Monmouth	4	33	13	27	0	73
Ocean township	Monmouth	4	873	81	19	75	1,048
Oceanport borough	Monmouth	4	149	0	22	60	231
Red Bank borough	Monmouth	4	428	126	0	99	653
Roosevelt borough	Monmouth	4	29	0	0	0	29
Rumson borough	Monmouth	4	268	26	67	112	473
Sea Bright borough	Monmouth	4	37	11	23	40	111
Sea Girt borough	Monmouth	4	115	0	45	65	225
Shrewsbury borough	Monmouth	4	277	10	20	47	354
Shrewsbury township	Monmouth	4	12	0	0	0	12
Spring Lake borough	Monmouth	4	132	12	41	65	250
Spring Lake Heights bor.	Monmouth	4	76	20	65	119	280
Tinton Falls borough	Monmouth	4	622	7	0	0	629
Union Beach borough	Monmouth	4	83	0	0	0	83
Upper Freehold township	Monmouth	4	43	23	0	51	117
Wall township	Monmouth	4	1,073	105	78	237	1,493
West Long Branch borough	Monmouth	4	219	14	18	27	278
Barnegat township	Ocean	4	329	63	7	96	495
Barnegat Light borough	Ocean	4	83	12	0	27	122
Bay Head borough	Ocean	4	65	1	12	26	104
Beach Haven borough	Ocean	4	70	3	27	76	176
Beachwood borough	Ocean	4	123	0	0	0	123
Berkeley township	Ocean	4	610	0	0	0	610
Brick township	Ocean	4	930	262	0	192	1,384
Eagleswood township	Ocean	4	36	0	5	31	72
Harvey Cedars borough	Ocean	4	44	3	4	18	69
Island Heights borough	Ocean	4	31	3	23	25	82
Jackson township	Ocean	4	1,247	56	74	333	1,710
Lacey township	Ocean	4	580	48	0	35	663
Lakehurst borough	Ocean	4	66	0	0	0	66

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Lakewood township	Ocean	4	0	533	412	55	1,000
Lavallette borough	Ocean	4	82	0	33	111	226
Little Egg Harbor township	Ocean	4	194	0	0	19	213
Long Beach township	Ocean	4	41	16	65	205	327
Manchester township	Ocean	4	370	0	0	0	370
Mantoloking borough	Ocean	4	60	0	19	1	80
Ocean township	Ocean	4	236	6	74	77	393
Ocean Gate borough	Ocean	4	12	0	0	0	12
Pine Beach borough	Ocean	4	41	0	0	10	51
Plumsted township	Ocean	4	47	14	44	47	152
Point Pleasant borough	Ocean	4	343	11	80	181	615
Point Pleasant Beach bor.	Ocean	4	167	36	64	236	503
Seaside Heights borough	Ocean	4	0	79	0	0	79
Seaside Park borough	Ocean	4	52	30	19	110	211
Ship Bottom borough	Ocean	4	71	0	57	38	166
South Toms River borough	Ocean	4	51	0	0	0	51
Stafford township	Ocean	4	555	114	0	246	915
Surf City borough	Ocean	4	49	3	22	100	174
Toms River township	Ocean	4	2,233	296	111	593	3,233
Tuckerton borough	Ocean	4	69	0	0	14	83
Bass River township	Burlington	5	15	0	1	16	32
Beverly city	Burlington	5	18	0	0	0	18
Bordentown city	Burlington	5	33	19	0	0	52
Bordentown township	Burlington	5	211	0	0	222	433
Burlington city	Burlington	5	89	0	0	0	89
Burlington township	Burlington	5	445	27	108	608	1,188
Chesterfield township	Burlington	5	55	7	0	0	62
Cinnaminson township	Burlington	5	331	9	32	100	472
Delanco township	Burlington	5	61	0	0	0	61
Delran township	Burlington	5	208	0	0	261	469
Eastampton township	Burlington	5	49	0	140	193	382
Edgewater Park township	Burlington	5	30	2	0	0	32
Evesham township	Burlington	5	534	80	126	794	1,534
Fieldsboro borough	Burlington	5	19	0	0	8	27
Florence township	Burlington	5	114	45	0	38	197
Hainesport township	Burlington	5	150	0	74	277	501
Lumberton township	Burlington	5	152	0	0	508	660
Mansfield township	Burlington	5	114	0	0	337	451
Maple Shade township	Burlington	5	0	0	0	0	0
Medford township	Burlington	5	418	14	131	503	1,066
Medford Lakes borough	Burlington	5	60	0	0	65	125
Moorestown township	Burlington	5	621	27	151	527	1,326

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Mount Holly township	Burlington	5	0	13	29	91	133
Mount Laurel township	Burlington	5	815	50	116	495	1,476
New Hanover township	Burlington	5	4	0	152	0	156
North Hanover township	Burlington	5	1	0	242	199	442
Palmyra borough	Burlington	5	39	0	0	0	39
Pemberton borough	Burlington	5	9	0	42	31	82
Pemberton township	Burlington	5	0	0	0	0	0
Riverside township	Burlington	5	6	0	0	0	6
Riverton borough	Burlington	5	15	0	16	69	100
Shamong township	Burlington	5	84	25	46	146	301
Southampton township	Burlington	5	85	25	17	154	281
Springfield township	Burlington	5	54	3	13	95	165
Tabernacle township	Burlington	5	106	0	34	137	277
Washington township	Burlington	5	11	0	0	11	22
Westampton township	Burlington	5	221	0	0	295	516
Willingboro township	Burlington	5	268	0	0	0	268
Woodland township	Burlington	5	19	2	38	68	127
Wrightstown borough	Burlington	5	10	0	0	28	38
Audubon borough	Camden	5	0	61	70	135	266
Audubon Park borough	Camden	5	4	0	8	15	27
Barrington borough	Camden	5	8	20	119	195	342
Bellmawr borough	Camden	5	107	31	107	100	345
Berlin borough	Camden	5	154	43	97	235	529
Berlin township	Camden	5	109	46	130	208	493
Brooklawn borough	Camden	5	23	0	0	26	49
Camden city	Camden	5	0	269	0	0	269
Cherry Hill township	Camden	5	1,829	325	581	94	2,829
Chesilhurst borough	Camden	5	28	7	0	45	80
Clementon borough	Camden	5	19	61	10	54	144
Collingswood borough	Camden	5	0	51	355	310	716
Gibbsboro borough	Camden	5	112	25	18	70	225
Gloucester township	Camden	5	359	117	120	763	1,359
Gloucester City	Camden	5	0	0	0	0	0
Haddon township	Camden	5	35	46	197	352	630
Haddonfield borough	Camden	5	192	10	88	482	772
Haddon Heights borough	Camden	5	23	19	88	214	344
Hi-Nella borough	Camden	5	0	0	0	4	4
Laurel Springs borough	Camden	5	17	0	0	36	53
Lawnside borough	Camden	5	33	0	0	50	83
Lindenwold borough	Camden	5	0	0	0	0	0
Magnolia borough	Camden	5	22	18	25	66	131
Merchantville borough	Camden	5	0	0	70	55	125

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Mount Ephraim borough	Camden	5	33	0	0	49	82
Oaklyn borough	Camden	5	1	13	43	81	138
Pennsauken township	Camden	5	0	167	23	302	492
Pine Hill borough	Camden	5	22	11	21	126	180
Pine Valley borough	Camden	5	47	0	0	0	47
Runnemede borough	Camden	5	40	33	79	129	281
Somerdale borough	Camden	5	95	0	217	89	401
Stratford borough	Camden	5	70	15	46	79	210
Tavistock borough	Camden	5	80	0	0	0	80
Voorhees township	Camden	5	456	239	305	456	1,456
Waterford township	Camden	5	102	0	132	167	401
Winslow township	Camden	5	377	51	248	701	1,377
Woodlynne borough	Camden	5	0	0	0	0	0
Clayton borough	Gloucester	5	94	44	114	119	371
Deptford township	Gloucester	5	522	87	243	648	1,500
East Greenwich township	Gloucester	5	252	6	0	30	288
Elk township	Gloucester	5	127	4	57	184	372
Franklin township	Gloucester	5	166	51	116	317	650
Glassboro borough	Gloucester	5	0	13	376	611	1,000
Greenwich township	Gloucester	5	308	0	44	93	445
Harrison township	Gloucester	5	198	0	64	527	789
Logan township	Gloucester	5	454	0	198	238	890
Mantua township	Gloucester	5	292	56	112	294	754
Monroe township	Gloucester	5	439	90	215	695	1,439
National Park borough	Gloucester	5	28	6	10	19	63
Newfield borough	Gloucester	5	14	0	0	22	36
Paulsboro borough	Gloucester	5	0	62	0	25	87
Pitman borough	Gloucester	5	40	36	14	75	165
South Harrison township	Gloucester	5	31	0	30	110	171
Swedesboro borough	Gloucester	5	23	22	21	0	66
Washington township	Gloucester	5	507	173	146	681	1,507
Wenonah borough	Gloucester	5	30	0	1	49	80
West Deptford township	Gloucester	5	368	15	247	410	1,040
Westville borough	Gloucester	5	27	0	0	19	46
Woodbury city	Gloucester	5	0	16	57	124	197
Woodbury Heights borough	Gloucester	5	55	5	0	57	117
Woolwich township	Gloucester	5	209	0	0	0	209
Absecon city	Atlantic	6	144	0	0	0	144
Atlantic City	Atlantic	6	2,458	0	0	0	2,458
Brigantine city	Atlantic	6	124	0	0	156	280
Buena borough	Atlantic	6	41	0	0	0	41
Buena Vista township	Atlantic	6	19	0	0	0	19

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Corbin City	Atlantic	6	13	0	0	0	13
Egg Harbor township	Atlantic	6	763	0	0	26	789
Egg Harbor City	Atlantic	6	42	0	0	0	42
Estell Manor city	Atlantic	6	21	0	0	0	21
Folsom borough	Atlantic	6	20	0	0	0	20
Galloway township	Atlantic	6	328	0	0	0	328
Hamilton township	Atlantic	6	349	0	0	51	400
Hammonton town	Atlantic	6	257	0	0	0	257
Linwood city	Atlantic	6	140	0	0	12	152
Longport borough	Atlantic	6	59	0	0	20	79
Margate City	Atlantic	6	97	0	0	104	201
Mullica township	Atlantic	6	40	0	0	0	40
Northfield city	Atlantic	6	190	0	0	2	192
Pleasantville city	Atlantic	6	0	0	0	0	0
Port Republic city	Atlantic	6	19	0	0	3	22
Somers Point city	Atlantic	6	103	0	0	3	106
Ventnor City	Atlantic	6	27	0	0	33	60
Weymouth township	Atlantic	6	15	0	0	0	15
Avalon borough	Cape May	6	234	0	0	59	293
Cape May city	Cape May	6	58	0	0	16	74
Cape May Point borough	Cape May	6	34	0	0	4	38
Dennis township	Cape May	6	220	0	0	0	220
Lower township	Cape May	6	324	0	0	0	324
Middle township	Cape May	6	454	0	0	0	454
North Wildwood city	Cape May	6	80	0	0	0	80
Ocean City	Cape May	6	411	0	0	168	579
Sea Isle City	Cape May	6	109	0	0	65	174
Stone Harbor borough	Cape May	6	141	0	0	22	163
Upper township	Cape May	6	317	0	0	0	317
West Cape May borough	Cape May	6	7	0	0	0	7
West Wildwood borough	Cape May	6	33	0	0	0	33
Wildwood city	Cape May	6	0	0	0	0	0
Wildwood Crest borough	Cape May	6	42	0	0	0	42
Woodbine borough	Cape May	6	88	0	0	0	88
Bridgeton city	Cumberland	6	0	0	0	0	0
Commercial township	Cumberland	6	45	0	0	0	45
Deerfield township	Cumberland	6	41	0	0	6	47
Downe township	Cumberland	6	10	0	0	4	14
Fairfield township	Cumberland	6	79	0	0	11	90
Greenwich township	Cumberland	6	13	0	0	1	14
Hopewell township	Cumberland	6	114	0	0	8	122
Lawrence township	Cumberland	6	10	0	0	0	10

Municipality	County	Reg.	Prior Round (87-99) Obligation	Present Need	Prospective Need	Gap Allocation	Initial Summary Obligation
Maurice River township	Cumberland	6	22	0	0	5	27
Millville city	Cumberland	6	0	0	0	21	21
Shiloh borough	Cumberland	6	7	0	0	1	8
Slow Creek township	Cumberland	6	14	0	0	1	15
Upper Deerfield township	Cumberland	6	242	0	0	26	268
Vineland city	Cumberland	6	0	0	0	37	37
Alloway township	Salem	6	17	0	0	1	18
Carneys Point township	Salem	6	184	0	0	14	198
Elmer borough	Salem	6	12	0	0	4	16
Elsinboro township	Salem	6	26	0	0	1	27
Lower Alloways Creek twp	Salem	6	26	0	0	8	34
Mannington township	Salem	6	19	0	0	4	23
Oldmans township	Salem	6	184	0	0	12	196
Penns Grove borough	Salem	6	0	0	0	0	0
Pennsville township	Salem	6	228	0	0	5	233
Pilesgrove township	Salem	6	35	0	0	15	50
Pittsgrove township	Salem	6	58	0	0	8	66
Quinton township	Salem	6	15	0	0	0	15
Salem city	Salem	6	0	0	0	0	0
Upper Pittsgrove township	Salem	6	27	0	0	5	32
Woodstown borough	Salem	6	8	0	0	7	15

