

ECONSULT SOLUTIONS, INC. GAP PERIOD CALCULATION

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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
Barneгат township	181	(21)	11	(19)	29	(114)	96
Barneгат 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
Bloomington 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	Developable 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
Pequanock 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	Develop- able 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	Develop- able 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
Woodlyne 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
Millville 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
Carneys 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)	0
Alpine borough	Bergen	1	110	(34)	0	0	34	(144)	0
Bergenfield borough	Bergen	1	86	(59)	102	280	(86)	0	0
Bogota borough	Bergen	1	27	(3)	34	193	(27)	0	0
Carlstadt borough	Bergen	1	94	(30)	74	12	(56)	(38)	0
Cliffside Park borough	Bergen	1	45	(173)	174	670	(45)	0	0
Closter borough	Bergen	1	81	(106)	11	22	73	(154)	0
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

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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

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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



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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

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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

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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



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Lebanon township	Hunterdon	3	44	(11)	6	77	(44)	0	0
Milford borough	Hunterdon	3	24	(2)	5	90	(24)	0	0
Raritan township	Hunterdon	3	312	(38)	11	293	(266)	(2)	44
Readington township	Hunterdon	3	587	(38)	10	417	(389)	(7)	191
Stockton borough	Hunterdon	3	20	(2)	3	23	(20)	0	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 Demotions	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 Demotions	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

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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

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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

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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

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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
Hopatcong 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
Barneгат township	Ocean	4	329	63	7	96	495
Barneгат 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
Stow 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