NEW JERSEY AFFORDABLE HOUSING NEED AND OBLIGATIONS

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1.0 SUMMARY OF REPORT

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

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

1.1 BACKGROUND

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

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

- Fair Housing Act (FHA): The Fair Housing Act of 1985 is the legislative embodiment of the Mt. Laurel decision. The FHA provided the basis for the establishment of the Council on Affordable Housing (COAH) to oversee the fair share housing process that it establishes.

- Round 1: COAH calculated the affordable housing obligation for all municipalities in the state. Round 1 went into effect in 1987 and covered the period 1987- 1993.

- Round 2: At the close of the Round 1, COAH again calculated the affordable housing obligation for all municipalities in the state. Round 2 went into effect in 1994 and covered the period 1993-1999. The Round 2 methodology was similar to, but not identical to, the Round 1 methodology.

- Round 3 (2004): COAH again calculated the affordable housing obligation for each municipality in 2004, using a different methodology than Round 1 or Round 2. This "growth share" approach was invalidated in 2007 by the New Jersey Appellate Court, which instructed COAH to revise its methodology for this round.

- Round 3 (2008): COAH attempted to remedy the deficiencies of the 2004 method and again calculated affordable housing obligations. While the Appellate Division, in 2010, invalidated some of the various regulations COAH adopted in 2008 including the revised "growth share" methodology, the Supreme Court considered various challenges to the Appellate Division Decision. In 2013, the Supreme Court issued its decision in which it invalidated all of the Round 3 regulations COAH adopted in 2008. In its decision, the Supreme Court instructed COAH to develop a methodology "similar to the methodologies used in the prior round rules" and to adopt new regulations in five months

- Un-adopted Round 3 (2014): COAH prepared a new affordable housing obligation for each municipality based on, but not identical to, the methodologies used in Round 1 and Round 2. COAH ultimately did not adopt these obligations.

- Supreme Court (2015): In March 2015, the New Jersey Supreme Court declared COAH moribund, and ordered the courts to resume oversight of affordable housing. The court ordered each municipality to prepare a new estimate of obligation, and provided guidance on how to do so. The Court ruling, among other things, again affirmed that the methodology for the determination of affordable housing obligations should be similar to the prior rounds.

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

1.2   PURPOSE AND SCOPE

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

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

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

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

1.3   METHODOLOGY

We base our methodology on several basic principles:

- The methodology is based on and similar to methods used in the Prior Rounds, and in other legislation and guidance provided by the Court. However, it is neither possible nor desirable to follow the prior round methodology precisely for several reasons. These include updates to relevant laws and regulations, differing time periods, newly available data sets, corrections to previous errors, and other changed circumstances.

- The methodology is clear and transparent. Calculation of obligations is constrained by the FHA, court decisions, prior methods, data availability, and other factors, so it is complex and lengthy. We lay out the method in significant detail and also provide an electronic appendix.

- For each calculation, we use the most recent and appropriate data that is available on a uniform statewide basis. The data is all derived from publicly available sources.

- To the greatest extent possible, the allocated municipal *obligations* should reflect the identifiable present and prospective *need* for affordable housing, as defined by the Fair Housing Act and as explained in In re Adoption of N.J.A.C. 5:96 & 5:97 ex rel. New Jersey Council on Affordable Housing, 221 N.J. 1 (2015) ("Mount Laurel IV").

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

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

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

Define the Regions (Section 2)

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

Calculate Present Need (Section 3)

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

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

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

Calculate Prospective Need by Region (Section 4)

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

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

Allocate Prospective Need to Municipalities (Section 5)

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

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

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

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

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

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

Determine Municipal Obligations (Section 7)

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

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

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

1.4 RESULTS BY MUNICIPALITY

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

- Present Need by Municipality: Appendix A, Table A.2 (p. 116 - 128)

- Municipal Allocation of Regional Prospective Need: Appendix B, Table B.2 (p. 131 - 145)

- Secondary Source Adjustments to Municipal Allocations: Appendix C, Table C.1 (p. 146 - 159)

- Allocation Cap Adjustments to Municipal Obligations: Appendix D, Table D.1 (p. 160 - 172)

- Initial Summary Obligations by Municipality: Appendix E, Table E.1 (p. 172 - 186)[2]

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

2.0   DEFINING HOUSING REGIONS

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

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

> "Housing region" means a geographic area of not less than two nor more than four contiguous, whole counties which exhibit significant social, economic and income similarities, and which constitute to the greatest extent practicable the primary metropolitan statistical areas as last defined by the United States Census Bureau prior to the effective date of P.L.1985, c. 222 (C.52:27D-301 et al.).
>
> [N.J.S.A. 52:27D-304 b.]

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

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

> After including certain judgmental decisions regarding the size of a region and its capacity to handle need, as well as the necessary inclusion in each region of at least one central city, the journey-to-work region takes the following form...
>
> [26 N.J.R 2316]

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

TABLE 2.1: REGIONAL COUNTY GROUPINGS ADOPTED IN ROUND 2 METHODOLOGY

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

2.1 DEFINITION FACTORS

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

The LEHD program includes collaboration between the federal Census Bureau and 49 states[3] under the Local Employment Dynamics (LED) Partnership. Under this program, states share Unemployment Insurance earnings data and Quarterly Census of Employment and Wages data with the Census Bureau, which combines these administrative data with its own administrative inputs and data from censuses and surveys. These inputs yield detailed statistics on employment, earnings and job flows at a variety of geographic levels. This data set, which was unavailable at the time of the Round 2 methodology, represents the most updated and appropriate data set for evaluating the live-work relationships between counties.

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

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

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

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

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

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

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

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

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

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

PMSA Definitions

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

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

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

A 2005 Bulletin[6] from the Federal Office of Management and Budget (OMB) to Executive Departments explains the evolution of statistical area definitions as follows:

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

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

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

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

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

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

2.2   REGIONAL DEFINITIONS

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

3.0 PRESENT NEED

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

- Present Need is not estimated on a forward-looking basis, but rather is an estimate of current conditions. As such, Present Need is best estimated as of the start of the Prospective Need period. Synchronizing the calculation of Present Need and Prospective Needs avoids either a gap period during which additional Present Need may accumulate prior to the start of the period, or an overlap during which additional LMI households who live in deficient housing units would be counted in both Present Need and Prospective Need. Therefore, the Present Need estimate is calculated as of July 1, 2015, matching the start of the Prospective Need period (as discussed in Section 4.1).

- Unlike Prospective Need, for which the base unit is households, the base unit for Present Need is occupied housing units. The procedure described below identifies indicators of housing deficiency, and accounts for overlap between those deficiencies in the same unit, and then applies the estimated proportion of LMI households currently occupying those deficient units. The result of this calculation is an estimate of units, rather than households. Importantly, the analysis estimates only deficient units occupied by LMI households. Therefore, for example, housing that is deficient but vacant is excluded.

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

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

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

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

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

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

1. First, we identify three surrogate measures of inadequate housing, and determine the current magnitude of each deficiency by municipality (Section 3.1).

2. Next, we adjust for the overlap between surrogates of deficiency (which may occur in the same unit) to arrive at a unique deficient unit estimate by municipality (Section 3.2).

3. Next, we apply the proportion of unique deficient units estimated to be occupied by LMI households to yield an estimate of unique, deficient LMI units by municipality (Section 3.3).

4. Finally, the procedure is repeated for a prior point in time to determine Present Need as of that time. An annualized growth trend in present need is determined by comparing current Present Need to the prior Present Need. That growth trend is applied to the current Present Need to yield an estimate of Present Need as of July 1, 2015 (Section 3.4).

3.1   MEASURES OF DEFICIENT HOUSING

To estimate the volume of deficient housing in each municipality, surrogate measures of housing deficiency must first be chosen. The Round 2 methodology utilizes seven proxies[7] tracked in Census data, and classified units as deficient if they were identified in two or more of the surrogate measures. COAH's 2004 Round 3 methodology replaces these indicators with three proxies, two of which are measured directly (units with inadequate plumbing facilities and units with inadequate kitchen facilities) and one of which combines two of the prior measures (units built before a given date with 1.01 or more persons per room, i.e. "old and overcrowded"). Under this approach, identification of a unit on any one of the three surrogates[8] results in that unit being classified as deficient.

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

> Because the third round methodology captures a newer overcrowded unit in the rehabilitation share if it lacks plumbing or kitchen facilities, and the other previously-used surrogates are unavailable in the current Census data, COAH's new approach as to overcrowded units is neither arbitrary nor irrational.
>
> [In re Adoption of N.J.A.C 5:94 & 5:95, 390 N.J. Super. 1]

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

> …the Appellate Division also approved a methodology for identifying substandard housing units that used "fewer surrogates [or indicators] to approximate the number of deficient or dilapidated housing units…the Appellate Court acknowledged a change in the available United States Census data that triggered the reduction in indicators and found that COAH did not abuse its discretion in reducing the number of factors from seven to three. That, like the previously mentioned areas left to COAH's discretion, and others not directly precluded by the Appellate Court's decision or ours remain legitimate considerations for the Mount Laurel judges when evaluating the constitutionality and reasonableness of the plans they are called upon to review.
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> [221 N.J. 1 (2015), page 45-46]

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

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

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

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

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

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

It is important to note that the data in the 2009-2013 ACS is effectively drawn in even increments across the five-year span it represents. While a portion of the data included is from 2013, the "midpoint" of the data sample is 2011. Therefore, Present Need estimates arising from this data set are best thought of as being calculated "as of" 2011, rather than 2013. This distinction is relevant for the extrapolation calculation performed in Section 3.4.2 below.

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

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

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

3.2   UNIQUE DEFICIENT UNITS

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

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

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

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

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

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

Last, these three non-overlapping set of figures are summed to yield an estimate of unique non-overlapped deficient units by municipality. Table 3.1 below shows the resulting estimates, summed at the region and statewide level (see Appendix A for figures by municipality). Statewide, approximately 94,000 unique deficient units are identified.

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

Region	Inadequate Plumbing	Pre-1960 and Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units
1	4,132	27,020	5,715	**36,867**
2	3,986	17,800	5,084	**26,870**
3	1,581	5,890	2,325	**9,796**
4	2,226	4,584	3,433	**10,243**
5	1,316	2,491	2,458	**6,265**
6	1,069	2,606	664	**4,339**
State	**14,310**	**60,391**	**19,679**	**94,380**

3.3   LMI PROPORTION

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

The deficient units are estimated at the municipal level based on county LMI shares. Table 3.2 summarizes the estimates at the regional and statewide level (see Appendix A for figures by municipality). The statewide estimate of unique deficient LMI units is approximately 66,000.

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

Region	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
1	36,867	72.1%	26,588
2	26,870	73.5%	19,739
3	9,796	67.7%	6,628
4	10,243	66.3%	6,796
5	6,265	61.2%	3,837
6	4,339	58.8%	2,553
State	**94,380**	**70.1%**	**66,141**

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

3.4 EXTRAPOLATION OF PRESENT NEED

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

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

FIGURE 3.1: EXTRAPOLATION OF PRESENT NEED FOR A SAMPLE MUNICIPALITY

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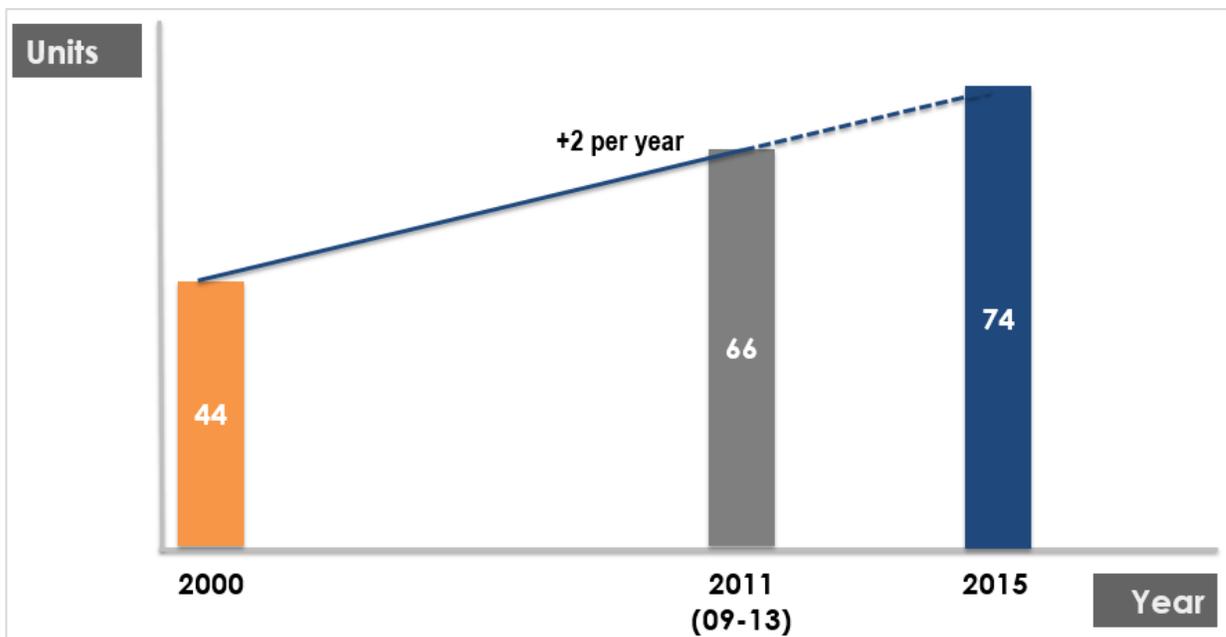
[14] The un-adopted 2014 Round 3 methodology for COAH extrapolated a Present Need estimate drawn from the 2010 Census to 2014 (the start of the Prospective Need period within that analysis) by calculating the unique LMI deficient units as a proportion of occupied housing stock for each municipality as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

3.4.1 DEFICIENT UNITS IN 2000

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

Census 2000 data provides direct cross-tabs of occupants per room and plumbing conditions by age of housing, with housing divided into pre-1950 and post-1950. It is therefore possible to identify old and crowded units by municipality directly in this data set, and to produce a non-overlapped count of units with deficient plumbing and those that are old and overcrowded. As in the 2009-13 procedure, the count of occupied units with inadequate kitchen facilities within each municipality is then adjusted by the proportion of units with inadequate kitchens within each county that have no other deficiency indicators (as identified in the PUMS data from the 2000 Census). This calculation produces an estimate of inadequate kitchen units net of any overlap with the prior deficiency indicators, meaning the categories can be summed to produce an estimate of unique deficient units by municipality. This estimate is then multiplied by the proportion of unique deficient units identified as being occupied by LMI households in each county, as identified in PUMS data based on LMI income cutoffs by household size from Census 2000 data (described in more detail in Section 4.4.1). The results of this calculation are shown by county and statewide in Table 3.3, and municipal level estimates are shown in Appendix A. The statewide estimate of deficient LMI units as of 2000 is approximately 52,000, about 14,000 less than the estimate from ACS 2009-13 data.

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

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

Region	Inadequate Plumbing	Pre-1950 and Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est LMI Proportion	Unique Deficient LMI Units
1	5,785	24,784	2,852	33,421	63.0%	21,058
2	4,795	15,002	2,500	22,297	69.0%	15,374
3	1,529	4,289	995	6,813	68.1%	4,637
4	1,891	4,102	1,054	7,047	66.0%	4,653
5	1,643	3,258	1,022	5,923	71.1%	4,213
6	887	2,312	856	4,055	60.5%	2,454
State	**16,530**	**53,747**	**9,279**	**79,556**	**65.9%**	**52,389**

3.4.2 TREND IN DEFICIENT UNITS

The current and past estimates of LMI deficient units are then compared to develop annualized trend based on the incremental change in units between the 2000 and 2011 midpoint estimates. This calculation is conducted for each municipality, and the trend established can be either positive or negative depending on the direction of the incremental change observed between 2000 and 2009-13. This incremental change is then annualized to produce an annual increment that can be extrapolated forward. Table 3.4 shows the results of this calculation at the regional level, which reflects a sum of the municipal incremental net changes. Statewide, the net change is an increase of 1,250 units per year.

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

Region	Unique Deficient LMI Units, 2000 Census	Unique Deficient LMI Units 2009-13 ACS	Net Change	Annualized Net Change
1	21,058	26,588	5,530	503
2	15,374	19,739	4,365	397
3	4,676	6,628	1,952	177
4	4,614	6,796	2,182	198
5	4,213	3,837	(376)	(34)
6	2,454	2,553	99	9
State	**52,389**	**66,141**	**13,752**	**1,250**

3.5   PRESENT NEED RESULTS

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

The results of this calculation at the region and statewide level are shown below in Table 3.5, and results by municipality are shown in Appendix A.[16] Statewide Present Need as of 2015 is estimated at approximately 71,000 units.

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

Region	Unique Deficient LMI Units 2009-13 ACS	Net Change (4 years)	Present Need, 2015
1	26,588	2,062	28,650
2	19,739	1,650	21,389
3	6,628	717	7,345
4	6,796	799	7,595
5	3,837	(54)	3,783
6	2,553	60	2,613
State	**66,141**	**5,234**	**71,375**

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

4.0 PROSPECTIVE NEED BY REGION

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

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

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

1. First, we identify the start and end date of the Prospective Need period (Section 4.1).

2. Next, we determine the projected population increase over the Prospective Need period, and the estimated proportion of that population living in households (Section 4.2).

3. Then, we estimate the headship rate, and hence the number of households associated with that population (Section 4.3).

4. Next, we estimate what proportion of households at the beginning and end of the period are low and moderate income (LMI) (Section 4.4).

5. Then, we remove LMI households who are ineligible for affordable housing due to their significant housing assets (Section 4.5).

6. Finally, we compare eligible LMI households at the start and end of the period to determine the incremental change, i.e. the Prospective Need, by region (Section 4.6).

4.1 TIME PERIOD

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

> Adopt criteria and guidelines for…municipal determination of its present and prospective fair share of the housing need in a given region **which shall be computed for a 10 year-period.**
>
> [N.J.S.A. 52:27D-307(c)(1), (emphasis added)]

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

> Prospective need means a **projection** of housing needs based on development and growth which is reasonably **likely to occur** in a region or municipality…
>
> [N.J.S.A. 52:27D-304(j), (emphasis added)]

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

> The *Mount Laurel* obligation to meet the prospective lower income housing need of the region is, **by definition, one that is met year after year in the future**, throughout the years of the particular projection used in calculating prospective need."
>
> [So. Burlington County N.A.A.C.P. v. Tp. of Mount Laurel, 92 N.J. 158, 219 (1983) (emphasis added)]

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

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

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

4.2   POPULATION PROJECTIONS

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

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

Historic Population Projections

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

> Rather than inferring migration under age 65 by economic factors, the Historical Migration Model applies the past net migration rates directly to the population distributed at each projection interval.
>
> [NJLWD, "Methodology – The Projection Models"]

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[18] Available online at: (http://lwd.dol.state.nj.us/labor/lpa/dmograph/lfproj/method22.doc)

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

> The only difference between the Historical Migration Model and the Economic-Demographic Model is the migration assumptions. **The projected population from these two models may be used as a range for possible population change in the future.**
>
> [NJLWD, "Methodology – The Projection Models" (emphasis added)]

Using the data set provided by NJLWD, it is possible to identify 12 unique five-year projection periods from which compound annual growth rates[19] (CAG) projected by the NJLWD can be compared to observed Census data for those periods. The results of this comparison are shown in Table 4.1.

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

Projection Base Year	Projection Period	Census Estimates		Economic Demographic (ED)		Historic Migration (HM)		Averaged (ED & HM)	
		Comparable Time Period	CAG	CAG	CAG vs. Census	CAG	CAG vs. Census	CAG	CAG vs. Census
2000	2000-2005	2000-2005	0.52%	0.74%	43%	0.68%	31%	0.71%	37%
2000	2005-2010	2005-2010	0.34%	0.72%	111%	0.68%	97%	0.70%	104%
2000	2010-2015	2010-2014	0.38%	0.71%	87%	0.78%	104%	0.76%	99%
2002	2002-2007	2002-2007	0.29%	0.84%	190%	0.93%	218%	0.89%	204%
2002	2007-2012	2007-2012	0.45%	0.72%	60%	0.88%	95%	0.80%	78%
2004	2004-2009	2004-2009	0.28%	0.50%	78%	0.60%	116%	0.55%	97%
2004	2009-2014	2009-2014	0.41%	0.63%	54%	0.59%	44%	0.61%	49%
2006	2006-2011	2006-2011	0.41%	0.35%	-15%	0.70%	71%	0.52%	28%
2006	2011-2016	2011-2014	0.36%	0.56%	55%	0.57%	57%	0.56%	56%
2008	2008-2013	2008-2013	0.45%	0.32%	-28%	0.27%	-40%	0.30%	-34%
2010	2010-2015	2010-2014	0.38%	0.50%	31%	0.44%	16%	0.47%	24%
2012	2012-2017	2012-2014	0.35%	0.39%	13%	0.36%	3%	0.38%	8%
AVG			**0.39%**	**0.58%**	**51%**	**0.62%**	**62%**	**0.60%**	**57%**

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

Table 4.1 illustrates that bi-annual projections from both the Economic Demographic and Historic Migration models have consistently overstated future population growth over the time period analyzed. On average, projections from the Economic Demographic model have overstated population growth observed in the Census by 51%, projections from the Historic Migration model by 62%, and the average of the two models by 57%. However, projections for each model, and in particular the Historic Migration model, appear to be more accurate for recent periods. For the current twenty-year horizon, the Historic Migration model projects a more conservative growth trend than the Economic Demographic model (see Figure 4.1 below).

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

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

<u>2015 and 2025 Population Projections</u>

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

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

FIGURE 4.1: NJLWD STATEWIDE POPULATION PROJECTIONS FOR PROSPECTIVE NEED PERIOD
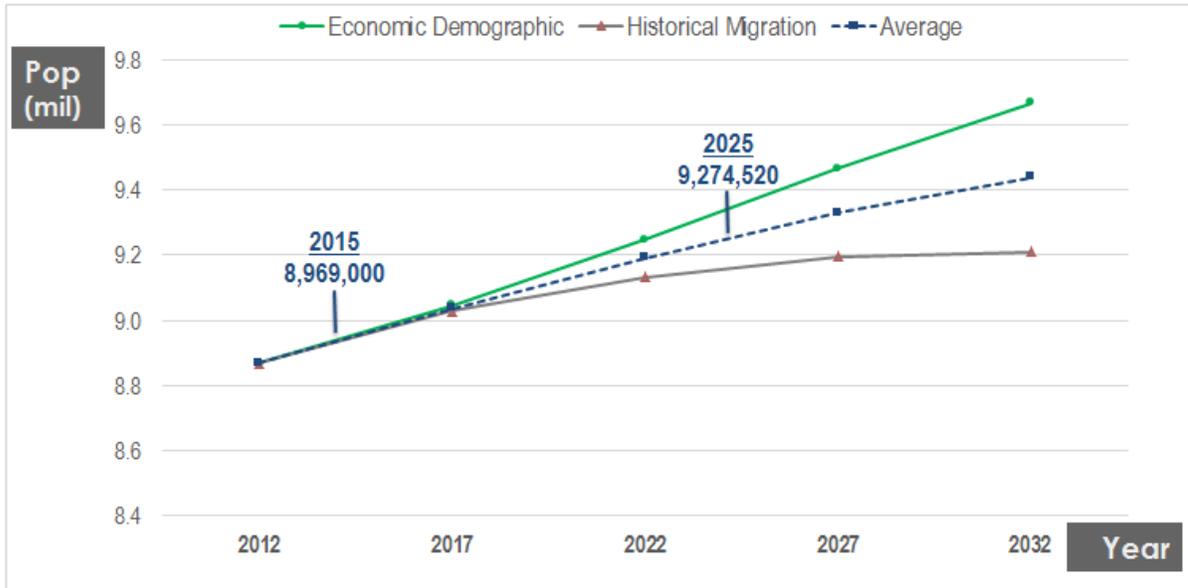
FIGURE 4.2: STATEWIDE OBSERVED POPULATION GROWTH AND NJLWD PROJECTIONS
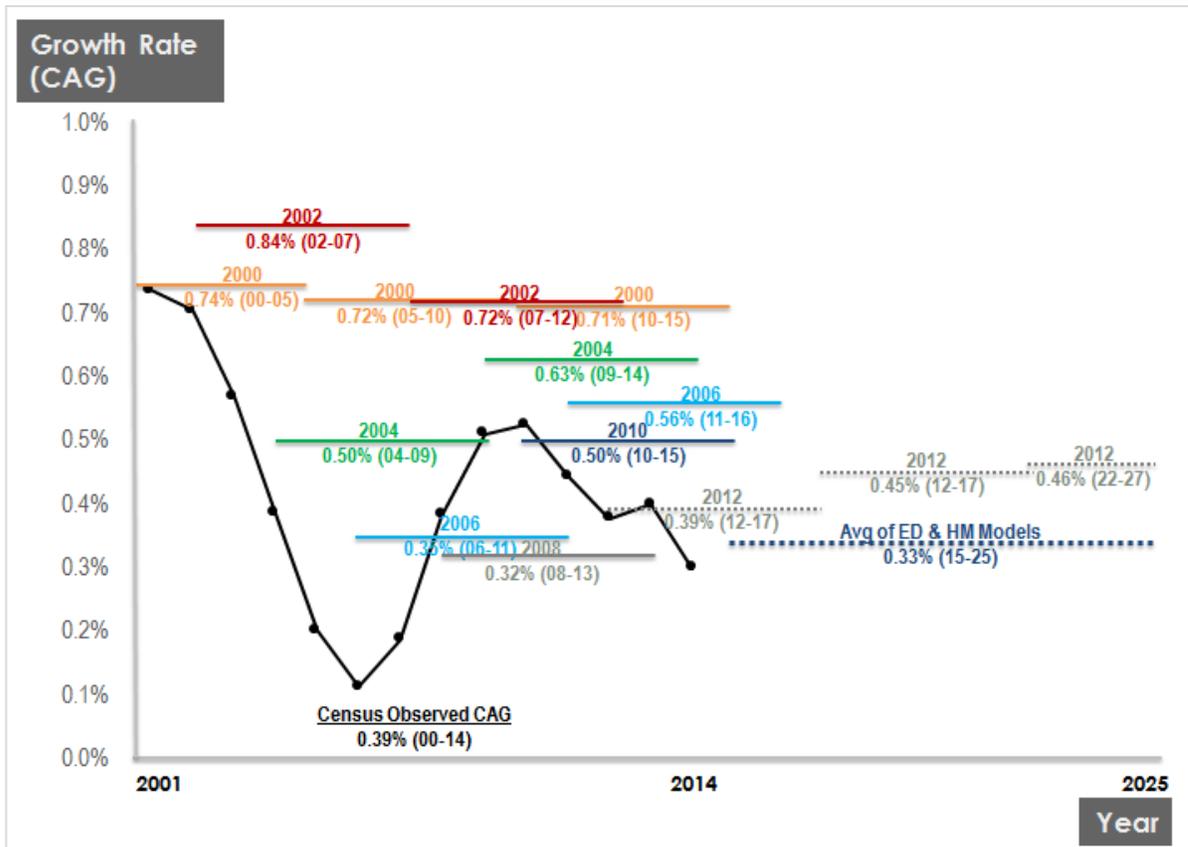
In the case of the Economic Demographic model, which is issued by county and age cohort for each five-year increment, projections are interpolated to yield results for 2015 and 2025 by annualizing the population growth increment for each county and age cohort combination and applying the appropriate increment (for example, 3/5 of the projected growth from 2022 to 2027 is applied to the 2022 projection to interpolate the 2025 projections for each county and cohort). In the case of the Historical Migration projection, which is currently only provided on a statewide level by NJLWD, the annualized approach is applied statewide (for example 3/5 of the population change from 2022 to 2027 is applied to the 2022 projection to interpolate the 2025 projection). Results are shown in Table 4.2.

TABLE 4.2: NJLWD STATEWIDE POPULATION PROJECTIONS

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

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

TABLE 4.3: PROJECTED POPULATION GROWTH 2015-2025 BY REGION AND STATEWIDE[21]

Region	Projected Population 2015	Projected Population 2025	Projected Increase	Projected Growth %
1	2,263,040	2,382,880	119,850	5.3%
2	1,956,860	2,015,420	58,560	3.0%
3	1,298,900	1,363,280	64,390	5.0%
4	1,591,250	1,632,620	41,360	2.6%
5	1,263,760	1,284,320	20,560	1.6%
6	595,190	595,000	(200)	0.0%
State	**8,969,000**	**9,273,520**	**304,520**	**3.4%**

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

4.2.1 POPULATION IN HOUSEHOLDS

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

The group quarters population is most accurately reported at the county and age cohort level in the decennial Census. Therefore, the proportion of the population in group quarters from the 2010 Census (the most recent available) is carried forward by age cohort and county and applied to the population projections for 2015 and 2025. This approach results in a relatively stable projection of the group quarters population over time, with the figures increasing slightly with population growth, and also varying slightly due to changes in the distribution of projected population between the county and age cohorts, even as the group quarters rate within those cohorts is held constant (see Figure 4.3 and Table 4.4). As a result of this modest growth in the group quarters population, the statewide population in households is anticipated to grow by approximately 292,000 between 2015 and 2025, slightly less than the total population growth projections of approximately 305,000.[22]

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

FIGURE 4.3: STATEWIDE POPULATION IN HOUSEHOLD PROJECTION, 2015-2025
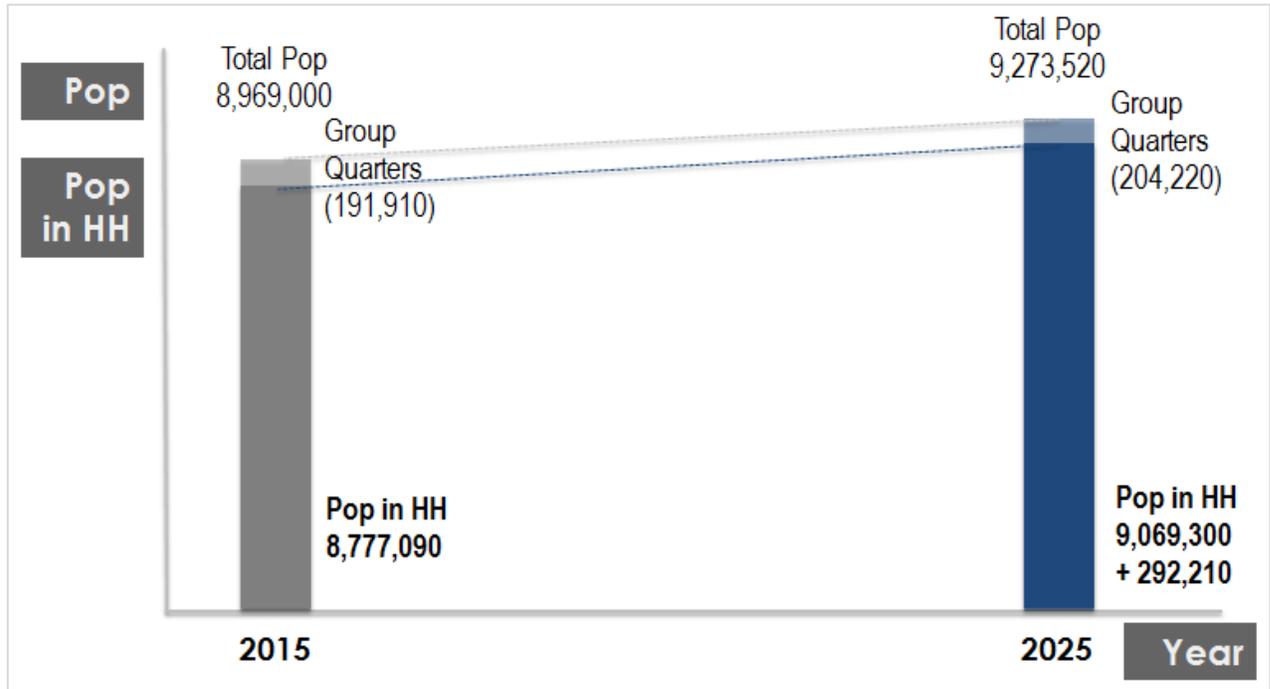
TABLE 4.4: PROJECTED POPULATION IN HOUSEHOLDS 2015-2025 BY REGION AND STATEWIDE

Region	Projected Population 2015	Group Quarters Rate	Population in HH 2015	Projected Population 2025	Group Quarters Rate	Population in HH 2025	Pop in HH Increase 2015-2025
1	2,263,040	1.51%	2,228,870	2,382,880	1.59%	2,344,930	116,050
2	1,956,860	2.17%	1,914,430	2,015,420	2.21%	1,970,820	56,390
3	1,298,900	2.56%	1,265,620	1,363,280	2.65%	1,327,160	61,540
4	1,591,250	2.15%	1,557,030	1,632,620	2.20%	1,596,650	39,630
5	1,263,760	2.02%	1,238,280	1,284,320	2.09%	1,257,520	19,250
6	595,190	3.75%	572,870	595,000	3.83%	572,230	(640)
State	**8,969,000**	**2.14%**	**8,777,090**	**9,273,520**	**2.20%**	**9,069,300**	**292,210**

4.3   HEADSHIP RATES AND HOUSEHOLDS

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

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

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

> Headship rates are determined by age group and county in New Jersey in 1990 and extended into the future at one-half the rate of change observed from 1980 to 1990.
>
> [26 N.J.R. 2347]

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

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[23] This can also be expressed as Headship Rate = (1 / Avg. Household Size)

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

Updating the Round 2 approach involves identifying the appropriate trend in headship rates to apply forward to the Prospective Need period. The most up to date data on current headship rates by county is drawn from the 2014 One-Year American Community Survey (ACS), which reports a statewide headship rate of 36.5%. The first year for which ACS data using the current (and therefore comparable) sampling methodology is available is the 2005 One-Year ACS. The statewide headship rate in 2005 was year was 37.7%, indicating a downward trend over the past decade.[25] However, as shown Figure 4.4, the headship rates indicated by the ACS One-Year samples show variation from 2005 to 2007, and then indicate a consistent downward trend from 2008 to 2014.

Another potential source for headship rate trends is the decennial Census, which indicates that the statewide headship rate was effectively flat from 2000 to 2010, increasing slightly from 37.3% in 2000 to 37.4% in 2010. Our analysis combines the most up to date current estimate of headship rates (the 2014 ACS) with the most reliable estimate of prior headship rates (Census 2000) to yield a slight downward trend in headship rates from 37.3% to 36.5% from 2000 to 2014. This trend is less steep than the trend implied by the 2005-2014 ACS, and more steep than the trend implied by the 2000-2010 Census.

The Round 2 methodology applies half of the rate of change observed over a ten-year period to formulate its projection for the Prospective Need period. We follow this method, adjusting for the different observation and projection periods. Here, the observation period is 14 years (2000 to 2014) and the extrapolation period is 1 year and 11 years (from known 2014 rates to projected 2015 and 2025 rates). The rate of change applied is reduced proportionally to 40% of the observed change from the prior period for the 2025 projection, and 4% for the 2015 projection.[26] The resulting headship rates for each age cohort and county are then multiplied by the headship rate to arrive at a projection of the number of households headed by members of that age and county combination in 2025. The effective headship rate yielded by this procedure is 36.51%, virtually identical to the 36.52% statewide rate from 2014 (see Figure 4.4). This result indicates that the within-age cohort and between-age cohort population aging effects nearly offset one another in this projection.

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

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

[26] Calculated precisely, the Round 2 methodology's application of 50% of a ten year change to a nine-year period (from 1990 Census data to a 1999 end date) computes to a rate of 0.556 (i.e. 5/9) of observed change per year of extrapolation. Applying this same ratio in this instance yields a rate of .437 [(5/9) / (14/11). Applying a rate of 50% per year yields a ratio of .393 [(1/2) * (11/14). Recognizing that this percentage as applied in the Prior Round was rounded, and not the result of this sort of precise calculation, 40% is used for the 2025 projection, and 4% for extrapolating from 2014 to 2015.

FIGURE 4.4: STATEWIDE HEADSHIP RATE TREND AND PROJECTIONS
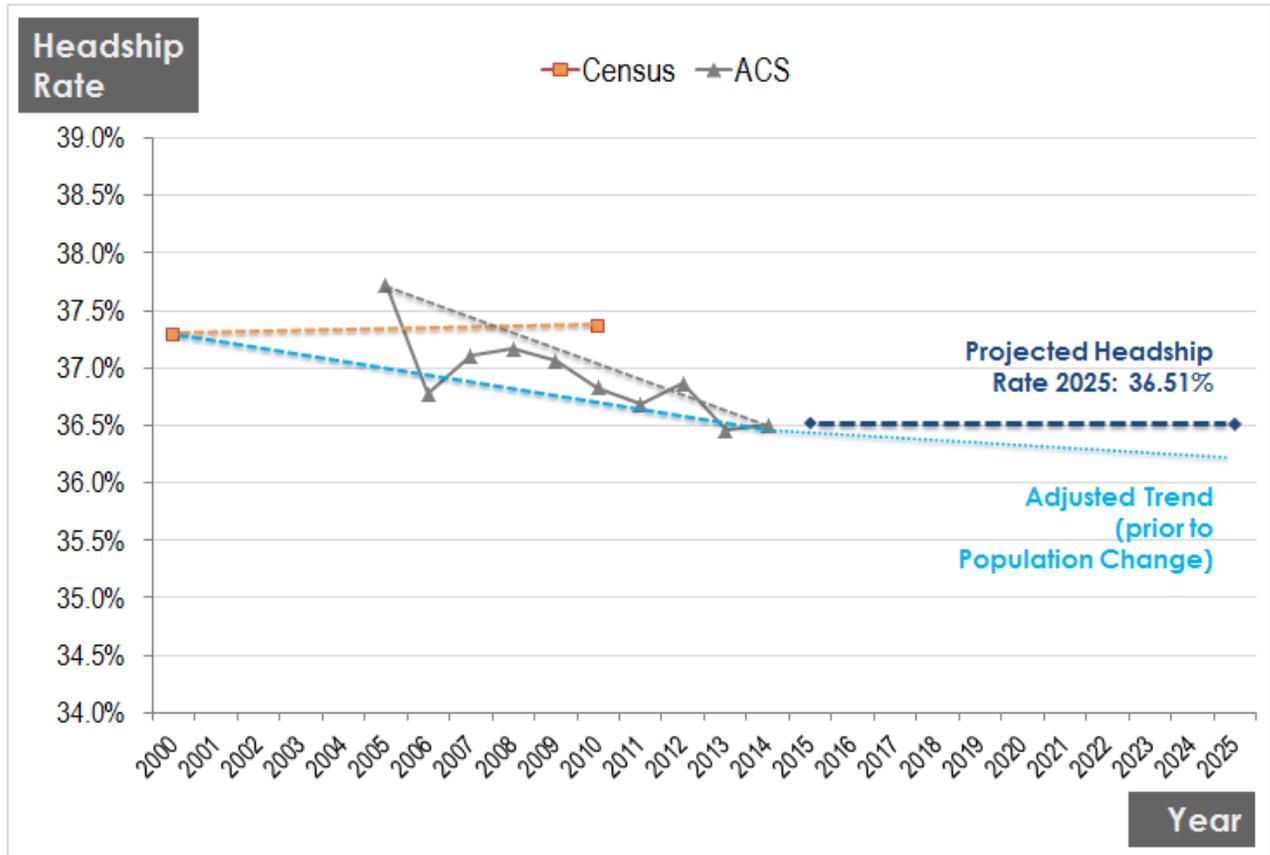
Set against the population in household projections shown in Table 4.4, the projected headship rates yield an estimate of household growth by region across this period totaling approximately 100,000 statewide. Notably, incremental household growth, like incremental population growth, is projected to be negative for Region 6 within the time period (see Table 4.5).

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

Region	Pop in HH 2015	Headship Rate	Households 2015	Pop in HH 2025	Headship Rate	Households 2025	HH Increase 2015-2025
1	2,228,870	36.2%	805,770	2,344,930	35.8%	839,630	33,860
2	1,914,430	35.9%	686,380	1,970,820	36.0%	709,500	23,120
3	1,265,620	35.4%	447,630	1,327,160	35.2%	466,970	19,330
4	1,557,030	37.6%	585,070	1,596,650	37.6%	599,670	14,600
5	1,238,280	37.4%	462,780	1,257,520	38.0%	478,400	15,620
6	572,870	38.0%	217,940	572,230	38.0%	217,190	(750)
State	**8,777,090**	**36.52%**	**3,205,570**	**9,069,300**	**36.51%**	**3,311,360**	**105,790**

The methodology described above for population projections, group quarters estimates, and headship rates is based on the approach employed in Round 2. It is also useful to examine the reasonableness of the projections that it yields relative to observed population and household growth trends in New Jersey. Figure 4.5 shows that from 2000-2015, New Jersey saw an increase of approximately 141,000 households or 9,400 households per year.[27] The household forecast methodology described above yields an annualized estimate of approximately 10,600 incremental households per year, slightly higher than (and broadly in line with) the current observed trend.

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

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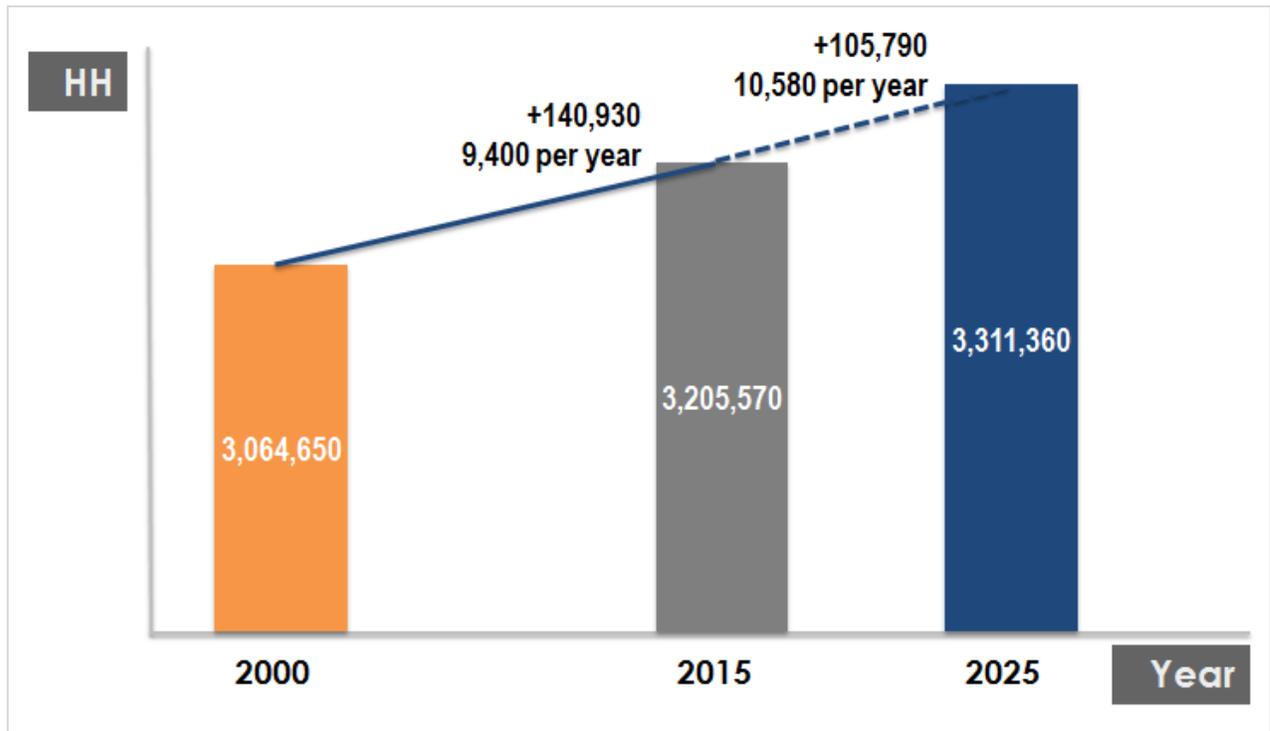
[27] Note that 14/15th of this time period is represented by observed Census Bureau data, with projections for 2015 only.

4.4 MEDIAN INCOME AND LMI PROPORTION

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

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

4.4.1 DEFINING MEDIAN INCOME

The Fair Housing Act offers definitions of low and moderate income housing which form the textural basis for defining median income and LMI thresholds in the calculation of affordable housing obligations. The FHA defines moderate income housing[28] as follows:

> "Moderate income housing" means housing affordable according to federal Department of Housing and Urban Development or other recognized standards for home ownership and rental costs and occupied or reserved for occupancy by households with a gross household income equal to more than 50% but less than 80% of the median gross household income for households of the same size within the region in which the housing is located.
>
> [N.J.S.A. 52:27D-304(d)]

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

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

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

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

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

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

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

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

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

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

Household Size[31]

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

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

Household Size

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

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

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

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

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

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

FIGURE 4.6: COMPARATIVE 2014 MEDIAN INCOME ESTIMATES BY HOUSEHOLD SIZE, REGION 1
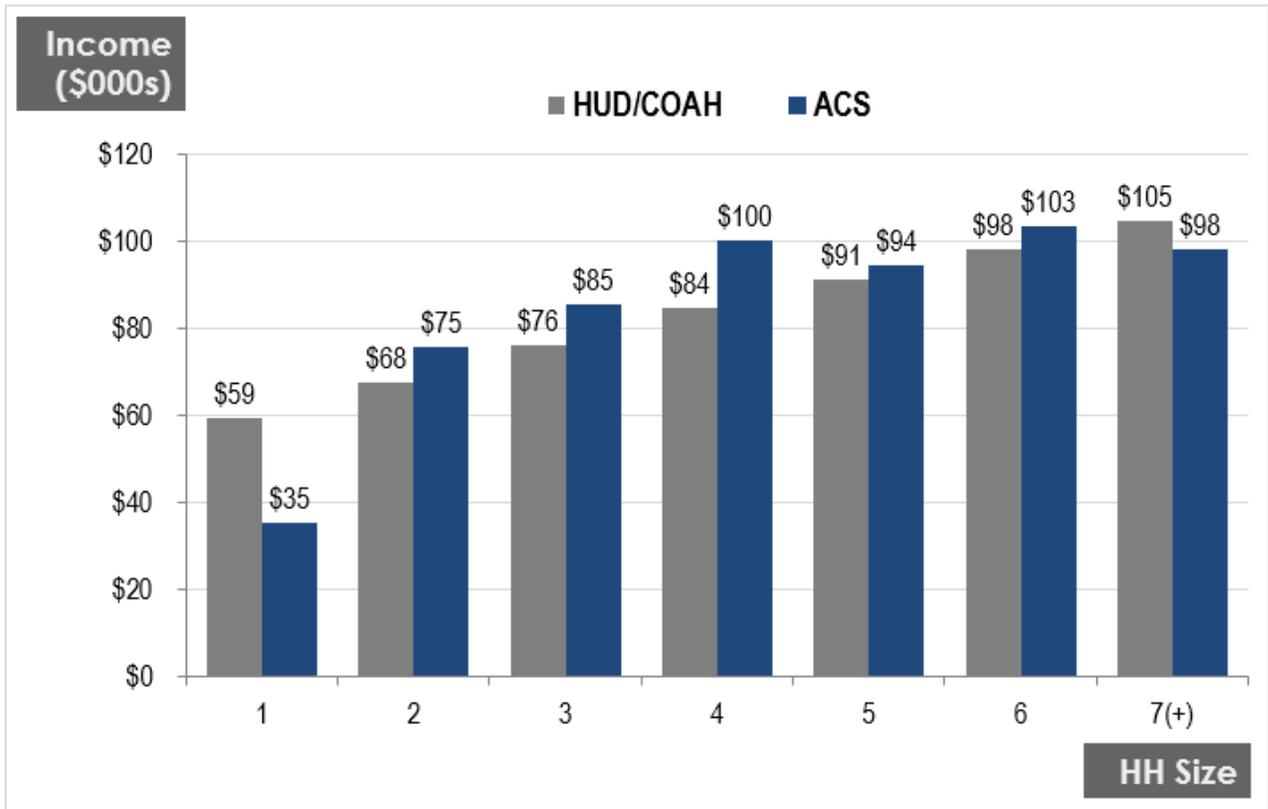
Table 4.8 shows that as a result of these definitional issues, ACS data indicates that more than 70% of one-person households in each region have a household income below the HUD/COAH median. Statewide, 52.2% percent of households have incomes lower than the HUD/COAH median for their household size, which of course violates the statistical principle of a median. This flawed median thereby produces a flawed calculation of LMI households based on income thresholds set at 80% of that median.

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

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

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

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

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

FIGURE 4.7: PROPORTION OF STATEWIDE HOUSEHOLDS BELOW HUD/COAH 2014 MEDIAN INCOME AND LMI THRESHOLDS
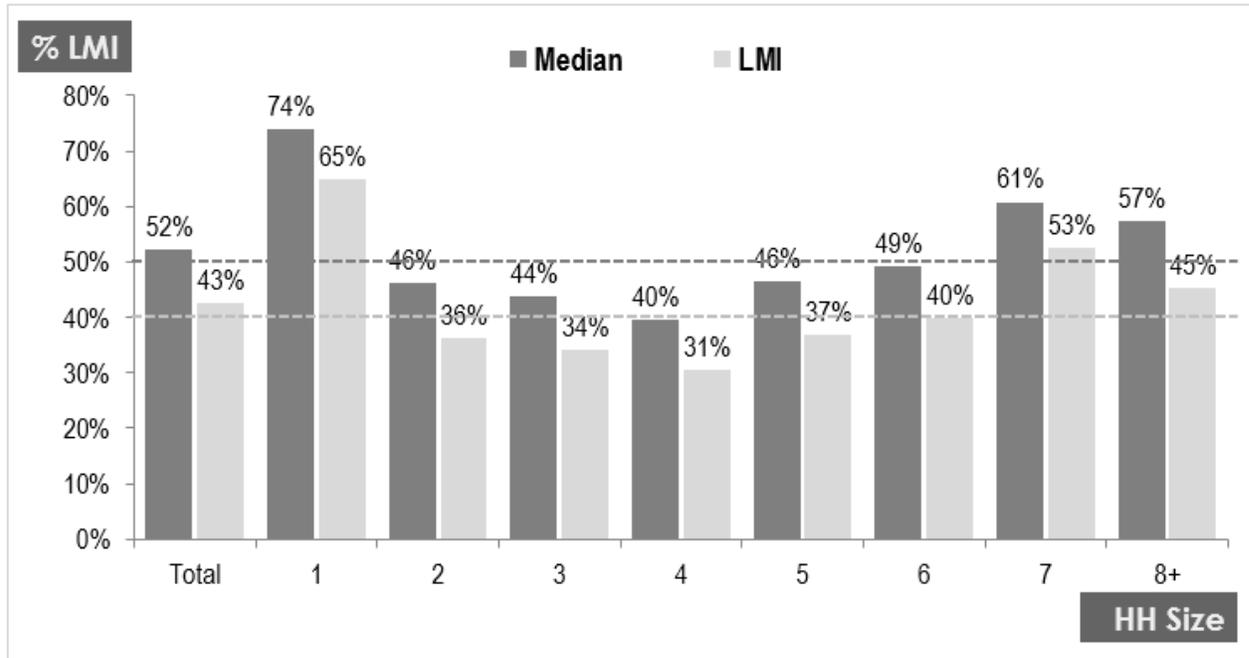
TABLE 4.10: HUD/COAH LMI THRESHOLD BY HOUSEHOLD SIZE AND REGION, 2014

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

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

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

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

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

	Household Size						
Region	**1**	**2**	**3**	**4**	**5**	**6**	**7+**
1	$28,120	$60,336	$68,240	$80,000	$75,520	$82,720	$78,560
2	$27,200	$62,720	$72,000	$86,000	$82,480	$77,120	$73,600
3	$35,520	$68,720	$80,400	$101,600	$96,320	$120,000	$65,616
4	$25,920	$62,720	$77,832	$87,728	$96,000	$80,803	$79.680
5	$24,960	$61,440	$77,280	$90,320	$78,160	$82,000	$88,960
6	$20,000	$48,960	$54,000	$68,960	$55,920	$39,600	$58,080

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

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

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

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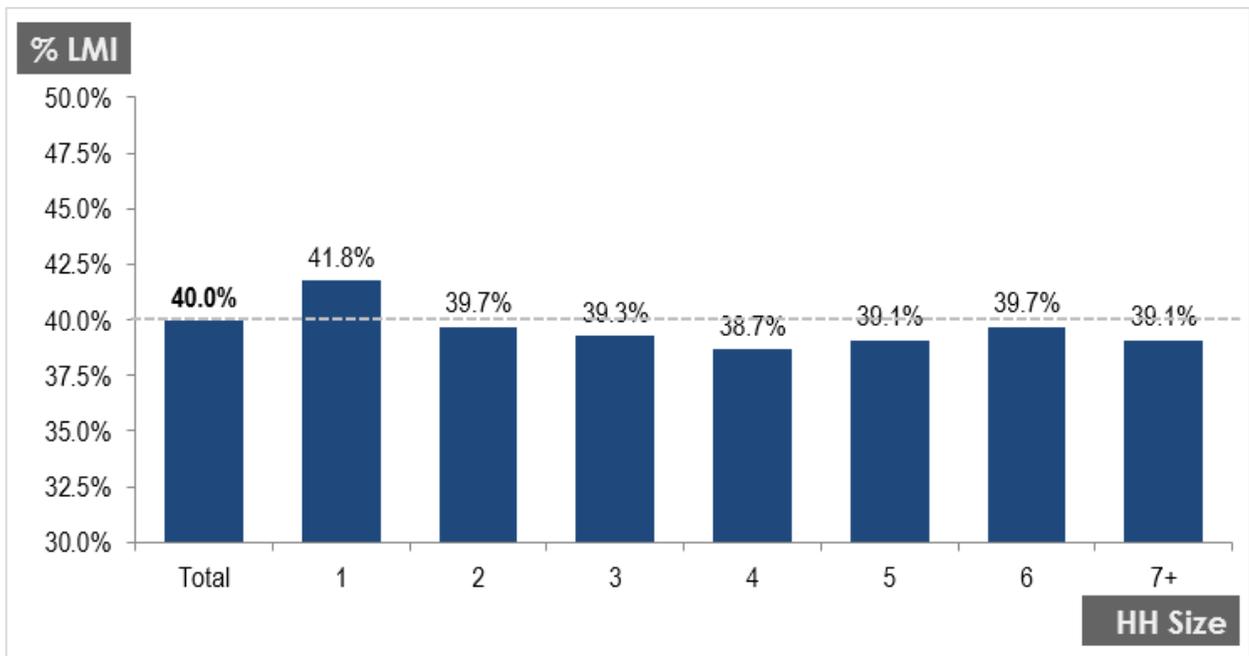
4.4.2 CALCULATING LMI HOUSEHOLDS

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

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

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

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

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

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

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

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

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

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

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

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

The results of this procedure are shown for each region and statewide for 2015 and 2025 in Table 4.13. The effective LMI rate (yielded by applying the LMI proportion by household size and region to the projected distribution of households by household size and region and aggregating the results) is 39.88% in 2015 and 39.89% in 2025.

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

Region	Total Households 2015	Effective LMI Rate 2015	LMI Households 2015	Total Households 2025	Effective LMI Rate 2025	LMI Households 2025
1	805,770	40.9%	329,180	839,630	40.8%	342,880
2	686,380	40.3%	276,730	709,500	40.3%	286,160
3	447,630	39.3%	175,880	466,970	39.3%	183,410
4	585,070	39.6%	231,800	599,670	39.6%	237,580
5	462,780	38.8%	179,680	478,400	38.9%	185,990
6	217,940	39.1%	85,270	217,190	39.1%	84,960
State	**3,205,570**	**39.88%**	**1,278,540**	**3,311,360**	**39.89%**	**1,320,990**

The resulting estimate of incremental LMI household growth over the Prospective Need period is shown in Figure 4.9 and Table 4.14. Statewide, LMI households are projected to increase by approximately 42,500, from 1,278,500 in 2015 to 1,321,000 in 2025.

FIGURE 4.9: PROJECTED INCREMENTAL GROWTH IN STATEWIDE LMI HOUSEHOLDS, 2015 – 2025
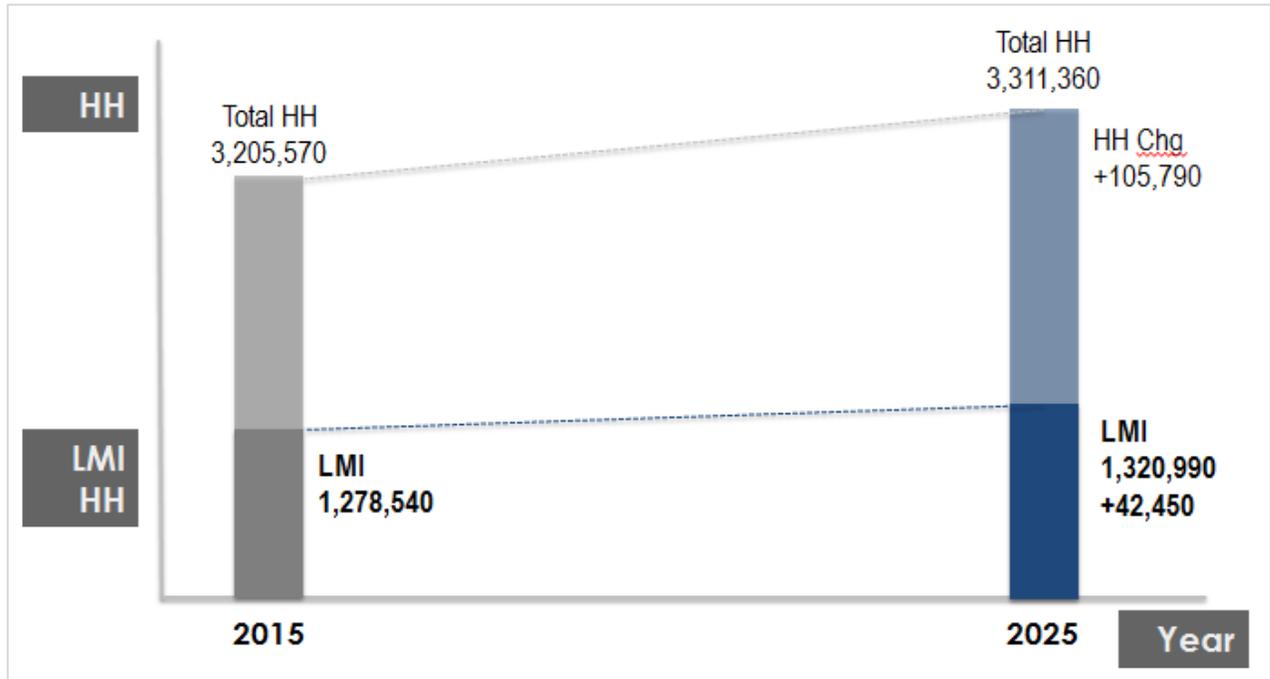
TABLE 4.14: PROJECTED CHANGES IN LMI HOUSEHOLDS 2015-2025 BY REGION AND STATEWIDE

Region	LMI Households 2015	LMI Households 2025	LMI HH Increase 2015-2025
1	329,180	342,880	13,700
2	276,730	286,160	9,440
3	175,880	183,410	7,540
4	231,800	237,580	5,780
5	179,680	185,990	6,310
6	85,270	84,960	(310)
State	**1,278,540**	**1,320,990**	**42,450**

4.5   SIGNIFICANT HOUSING ASSETS

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

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

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

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

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

a) Own a primary residence valued at our above the regional asset limit published by COAH with no mortgage; and

b) Pay less than 38% of eligible monthly income on housing costs, as per the standard established in UHAC.

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

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

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

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

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

The significant asset test is applied by comparing the sum of eligible assets as reported in the 2014 One-Year PUMS to the 2014 regional asset limits published by COAH. The proportion of LMI households disqualified from eligibility for affordable housing by this standard is calculated for each region and household size combination. Statewide, this proportion sums to 11.9% for both 2015 and 2025. These proportions are then applied, by county and household size, to the projected population of LMI households for 2015 and 2025 (as estimated in Section 4.4). This yields an estimate of eligible LMI households at the beginning and end of the Prospective Need period.

The results of this calculation are shown in Figure 4.10 and Table 4.15. Approximately 152,000 households are disqualified by the significant asset test in 2015, and approximately 157,000 households are disqualified by the asset test in 2025. Eligible LMI households are estimated to increase by approximately 37,000 over the Prospective Need period.

FIGURE 4.10: PROJECTED INCREMENTAL GROWTH IN STATEWIDE ELIGIBLE LMI HOUSEHOLDS, 2015 – 2025
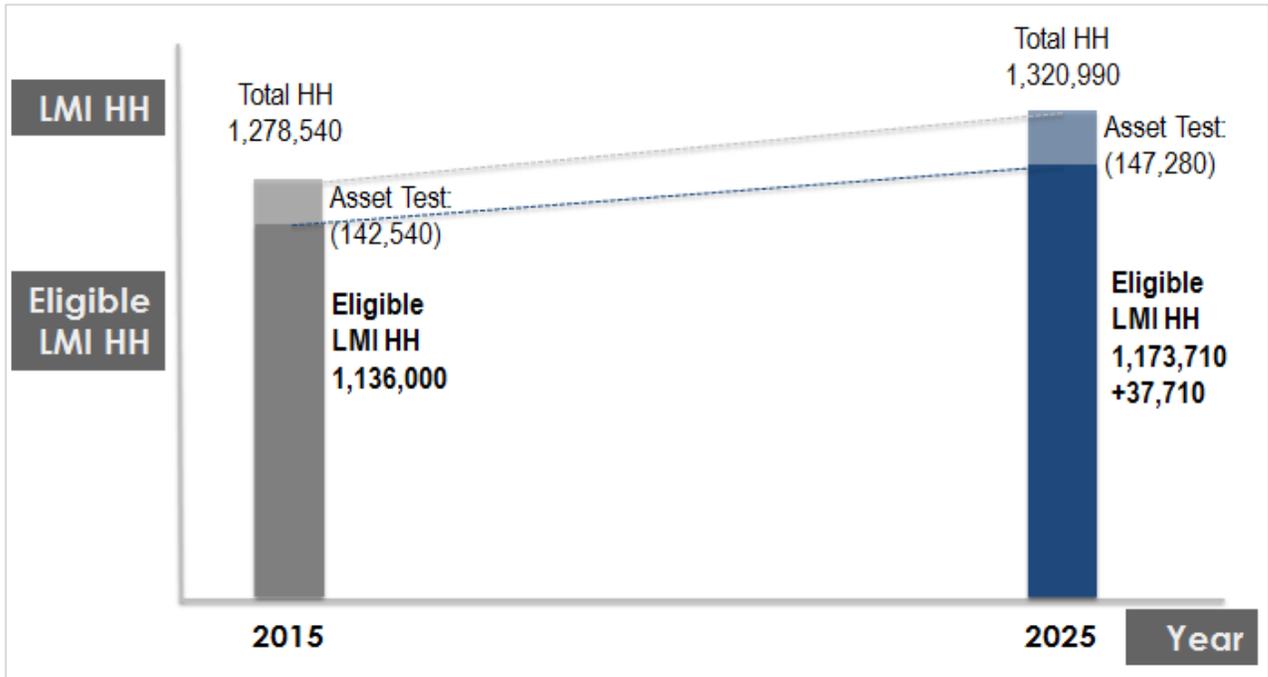
TABLE 4.15: HOUSEHOLDS WITH SIGNIFICANT REAL ESTATE ASSETS 2015-2025 BY REGION AND STATEWIDE

Region	LMI Households 2015	HH with Significant Assets 2015	Eligible LMI Households 2015	LMI Households 2025	HH with Significant Assets 2025	Eligible LMI Households 2025	Eligible LMI HH Increase 2015-2025
1	329,180	(30,440)	209,730	342,880	(31,560)	311,280	**12,540**
2	276,730	(24,900)	251,830	286,160	(25,800)	260,360	**8,530**
3	175,880	(24,860)	151,020	183,410	(25,820)	157,600	**6,560**
4	231,800	(31,720)	200,080	237,580	(32,520)	205,060	**4,980**
5	179,680	(20,470)	159,220	185,990	(21,410)	164,590	**5,370**
6	85,270	(10,160)	51,110	84,960	(10,130)	74,830	**(290)**
State	**1,278,540**	**(142,540)**	**1,136,000**	**1,320,990**	**(147,280)**	**1,173,710**	**37,710**

4.6   PROSPECTIVE NEED BY REGION RESULTS

The final step is to summarize the increase in eligible LMI households to yield the Prospective Need for the July 2015 – June 2025 period by region. Regional Prospective Need is calculated as the incremental difference between eligible LMI households at the start of the Prospective Need period in 2015 and the end of the Prospective Need period in 2025. Table 4.16 below shows Prospective Need by region and statewide. Statewide need totals approximately 37,700.

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

Region	Eligible LMI Households 2015	Eligible LMI Households 2025	Regional Prospective Need
1	209,730	311,280	**12,540**
2	251,830	260,360	**8,530**
3	151,020	157,600	**6,560**
4	200,080	205,060	**4,980**
5	159,220	164,590	**5,370**
6	51,110	74,830	**(290)**
State	**1,136,000**	**1,173,710**	**37,710**

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

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

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

> [26 N.J.R. 2347]

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

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

This procedure is problematic on a number of levels.

- First, it seeks to determine where jobs grew in the past in order to allocate future affordable housing needs. In fact, the more relevant metric for determining future affordable housing need is the employment change over the Prospective Need period, which may not be correlated with changes by region over the prior period.

- Second, projected changes in future employment by location are already built into the population model. The Economic Demographic population projection model from the NJLWD explicitly uses employment forecasts as the driver of net migration, and therefore population growth, by county. While the Economic Demographic model is averaged with the Historic Migration model to determine the overall population base, as described in Section 4.2, the distribution of population by county for 2025 is drawn directly from the Economic Demographic model, and then re-based to the averaged population estimate. Thus, anticipated employment growth by region is already included in the projections of populations and households by region.

- Further, the regions themselves are defined in part by the live-work relationships within their borders, as described in Section 2.1. This process ensures that the majority of in-state commuters working in each region live in that region as well (approximately 68% statewide, based on 2013 data). Therefore, it is unclear why re-allocation between the regions is necessary.

- 65 is not necessarily the end of "working age," and seniors do not necessarily "age in place." The 1983 Social Security Amendments phased in an increase in the full retirement age to 67, citing "improvements in the health of older people and increases in average life expectancy."[39] Further, LMI retirees do not necessarily stay in their original locations. Many move to take advantage of lower costs of living or communities geared towards their needs. Some regions of the state may have a positive or negative "net migration" from this group.

- Finally, the metric used for this re-allocation is highly problematic. The use of non-residential valuation as a proxy for ratable growth is discussed in more detail in Section 5.2 of this analysis, which evaluates its suitability for use in the municipal allocation calculation, and substitutes more appropriate direct measures of employment within that allocation formula. As that section makes clear, the link between employment growth and non-residential valuation growth is weak. While it is understandable that this proxy was employed at the municipal level, where direct measures of employment were problematic at the time the Round 2 methodology was developed, it is surprising that direct

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

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

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

5.0 MUNICIPAL ALLOCATION OF PROSPECTIVE NEED

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

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

1. First, qualifying urban aid municipalities are identified and excluded from the remainder of the calculation, as they have no prospective need obligations under the Prior Round methodologies (Section 5.1).

2. Next, measures of municipal "responsibility" for affordable housing need are defined and calculated for each municipality as a share of their region (Section 5.2).

3. Then, measures of municipal "capacity" for affordable housing need are defined and calculated for each municipality as a share of their region (Section 5.3).

4. Finally, the resulting regional shares on each measure are averaged for each municipality to produce a total obligation share as a proportion of regional need. Those shares are set against total regional Prospective Need, as determined in Section 4, to arrive at initial municipal allocations of Prospective Need (Section 5.4).

5.1   URBAN AID MUNICIPALITIES

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

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

1. A level of existing LMI housing deficiency exceeding average LMI housing deficiency for the region in which they are located (as determined by the Present Need calculation described in Section 3 and shown in Appendix A); OR

2. A population density of greater than 10,000 persons per square mile (as measured by a comparison of 2014 municipal population from the American Community Survey and municipal land area as reported by the New Jersey Department of Community Affairs); OR

3. A population density of 6,000 to 10,000 persons per square mile AND less than 5 percent of vacant, non-farm municipal land as measured by the average of the proportion of land valuation and the proportion of total parcels represented by vacant parcels (as reported by the New Jersey Department of Community Affairs for 2014).

There are 58 municipalities on the State's urban aid list for FY 2016.[40] Table B.1 in Appendix B below shows the results of the application of these standards to each of the 58 municipalities. In total, 44 municipalities are determined to be "qualifying" and are thus exempted from any Prospective Need allocation.

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

> Only those municipalities designated here-in to receive re-allocated present need and prospective need shall be included in the housing region totals…for the purpose of distributing need.
>
> [26 N.J.R. 2318]

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

Table 5.1 shows the 44 qualifying urban aid municipalities excluded from the municipal allocation of regional Prospective Need.

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

TABLE 5.1: QUALIFYING URBAN AID MUNICIPALITIES[41]

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

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

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

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

[18 N.J.R. 1136]

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

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

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

5.2   RESPONSIBILITY FACTORS

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

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

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

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

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

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

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

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

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

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

Partnership program of the U.S. Census Bureau.[43] Based on a combination of state and federal administrative data and data from census and surveys, the Census Bureau reports detailed statistics on employment at a variety of geographic levels, including municipalities. This data source, which was not available in the Round 2 methodology, allows for the use of direct employment data as originally envisioned in the Round 1 methodology, replacing the flawed proxy of non-residential valuation growth. The consistent time series associated with this metric allows for the calculation of both the change in employment over time in each municipality, and the level of employment in each municipality as of the most recent data release (2013), mirroring the treatment of non-residential valuation (which included both change and level) in Round 2.[44]

5.2.1 EMPLOYMENT LEVEL

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

5.2.2 CHANGE IN EMPLOYMENT

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

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

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

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

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

5.3   CAPACITY FACTORS

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

> …represent measures of *capacity*, i.e. the physical and fiscal capacity to absorb and provide for such housing.
>
> [18 N.J.R. 1136 (emphasis in original)]

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

5.3.1 AGGREGATE INCOME DIFFERENCE

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

> This procedure replaces the unaltered share of aggregate income (from Round 1) that tended to give large middle-class municipalities an overabundance of low- and moderate-income housing need because they had a lot of households with reasonably healthy incomes. This new procedure employs not income but income differences…It is believed that this procedure achieves both equity and more incisive income targeting.
>
> [26 N.J.R. 2346-2347]

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

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

a. Municipal share of the regional sum of the differences between median 1993 municipal household income and an income floor ($100 below the lowest average household income in the region), and

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

[26 N.J.R. 2346]

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

• The first income difference calculation in Round 2 compares the *median* income for a given municipality to a regional income floor based on *average* income. While the procedure is intended to produce a positive result[47] for all participating municipalities,[48] it is possible for a comparison of a median income with a regional floor based on average income to produce a negative result, which would be problematic for translating the income share average to the regional allocation formula. This negativity can occur because a municipal median can, as a statistical matter, be lower than the lowest average income for any municipality in the region. This negative effect does in fact appear in the 2009-2013 data prior to the removal of qualifying urban aid municipalities from the calculation. In addition, it is questionable whether the comparison of a median to an average is statistically valid for the purposes of determining income differences.

    o To correct this deficiency, the *median* income for each municipality is compared to a regional floor set $100 below the lowest *median* income in the region in this procedure, using median income by municipality from the 2009-2013 Five-Year ACS.

• The second income difference calculation in Round 2 compares the median income for a given municipality to a regional income floor based on median income, and then weights those difference by the number of households in each region to determine the regional income pool from which income share is calculated. However, this weighting procedure

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

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

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

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

5.3.2 DEVELOPABLE LAND

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

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

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

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

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

[52] Properties were coded as potentially developable if:
   a) their property classification is 1 (Vacant Land), 3A (Non-Qualified Farm), or 3B (Farm Qualified); OR
   b) their property classification is 2 (Residential -four families or less), 4A (Commercial), 4B (Industrial), or 4C (Apartment) AND the "improvement value" for the parcel is 0.

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

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

Developable acreage in each planning designation is then multiplied by the weight assigned to that planning designation, and are summed to yield a total estimate of weighted developable acreage for each municipality. Results for each municipality are summed into regional totals, and shares of the regional total are computed for each municipality in each region. This proportion represents the developable land factor for each municipality in the municipal allocation formula.

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

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

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

[56] This method mirrors the weighting approach in Dr. David Kinsey's 2015 methodology for the Fair Share Housing Center

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

5.4   MUNICIPAL SHARE OF REGIONAL PROSPECTIVE NEED

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

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

TABLE 5.2: SAMPLE MUNICIPAL ALLOCATION CALCULATION

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

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

[58] The sum of municipalities will vary incrementally from the regional Prospective Need due to rounding (since a municipality cannot be assigned a fractional portion of a unit). In addition, for region 6, where regional Prospective Need was calculated to be negative, the allocated Prospective Need is zero (rather than an allocation of a negative number). As a result, the allocated Prospective Need by municipality statewide (which in practice is the sum of municipalities in Regions 1-5, with a zero for municipalities in Region 6) is slightly higher than the sum of Regional Prospective Need (which includes a negative value for Region 6, as shown in Table 4.16).

6.0 SECONDARY SOURCES OF AFFORDABLE HOUSING SUPPLY

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

Three sources of market-based supply changes (referred to collectively as the "secondary sources") are estimated:[59]

1. Demolitions: Existing housing structures are at times demolished. To the extent that those units were previously occupied by LMI households and were not deficient (in which case they would already be captured within the Present Need calculation), these demolitions subtract from affordable housing supply, and therefore add to affordable housing need.

2. Residential Conversions: Existing residential structures can also be converted to yield a greater or lesser number of housing units. A portion of these changes impact the supply of affordable housing units. This impact may be positive or negative for a given geography, although it is typically positive, implying that conversions on net create additional supply, and therefore subtract from affordable housing need.

3. Filtering: Finally, existing housing stock changes value over time through depreciation or appreciation and real estate market forces. These changes can make existing units newly available or unavailable to LMI households, thus altering affordable housing supply. This estimate is the net difference between units filtering "down to" and "up from" the affordable housing category, and may be positive or negative for a given geography. A positive filtering estimate implies an addition to affordable housing supply (i.e. more units down than up) and subtracts from affordable housing need.

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

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

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

6.1 DEMOLITIONS

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

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

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

Next, the LMI proportion of these demolitions is estimated. The American Housing Survey, which was used as a data source in secondary source calculations in the Round 2 methodology, provides a breakout of national demolitions by two factors relevant to this calculation: the occupancy status of the unit, and in the case of occupied demolitions, the income level of the occupant. For a demolition to count as reducing the amount of affordable housing, the unit must be 1) occupied, and 2) occupied by a LMI household.[61] Our analysis therefore uses the national proportion of demolitions of occupied (rather than vacant or seasonal) units, drawn from an average of five iterations of the Components of Inventory Change (CINCH) report issued from 2003-2011.[62] The same data set is used to estimate the proportion of occupied demolished units

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

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

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

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

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

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

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

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

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

6.2 RESIDENTIAL CONVERSIONS

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

This procedure follows the structure from Round 2, updating data sources as necessary. Change in residential housing stock is measured from 2000 to 2010 (using decennial Census data) at the county level, and then aggregated to the housing regions.[65] Housing unit certificates of occupancy for this period, as reported by the New Jersey Department of Community Affairs (DCA) at the municipal level, are used rather than residential building permits[66] to deduct the portion of the observed increase in housing units attributable to construction activity. Demolitions are also drawn from DCA data at the municipal level. Both construction and demolition activity are summed to the regional level, and the net difference is then compared to net difference in housing units. As in the Round 2 approach, the remaining difference in housing supply unexplained by construction or demolitions is assumed to be the result of housing conversions. The resulting estimate from this period is annualized and applied to the ten year prospective need period.

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

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

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

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

Finally, an estimate must be developed as to the proportion of these conversions that are affordable to LMI households. The Round 2 methodology asserts that "on a percentage basis, a greater share of residential conversion units flows to the low-and moderate-income population than to the population as a whole." (26 N.J.R. 2349) However, it does not specify how this proportion is estimated within the calculation. For this procedure, 120% of the proportion of households qualifying as LMI within each county[67] is applied to the estimate of residential conversions for each municipality to yield an estimate of LMI residential conversions.

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

TABLE 6.2: LMI RESIDENTIAL CONVERSIONS BY REGION AND STATEWIDE

Region	Est. Residential Conversions (Apr 2000 – Apr 2010)	Effective LMI Rate	Projected LMI Residential Conversions, 2015-2025
1	22,203	52.4%	11,629
2	5,225	54.2%	2,833
3	5,071	48.3%	2,451
4	4,273	47.4%	2,025
5	222	46.3%	99
6	2,499	44.7%	1,115
State	**39,491**	**51.0%**	**20,152**

6.3   FILTERING

Filtering of affordable housing stock occurs when housing becomes newly accessible ("filtering down") or inaccessible ("filtering up") to LMI households through depreciation and changes in real estate market conditions. It is important to note that while the fair share obligation process envisions zoning for and building affordable housing, most of the existing housing affordable to LMI households was originally market rate housing, not housing specifically built for the affordable market, and has become part of the affordable housing supply over time through depreciation and natural market forces (i.e. filtering). Downward filtering occurs because housing

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

ages, the design and style of the house falls out of fashion, and because neighborhoods fall out of favor. Upward filtering occurs because a location has become more valuable, and is sometimes referred to as "gentrification." Across the overall housing market, downward filtering is more common than upward filtering.[68]

As housing units age, deteriorate, and become outdated, they move down the "quality ladder." The filtering process occurs as a result of households attempting to maintain their desired housing quality.[69] Higher income households tend to move into high-quality new construction rather than rehabilitate their current unit, which can require significant investment to achieve the same quality as new construction.[70] As higher income households move to new accommodations, existing units are freed up for medium, moderate, and then low income households.[71]

Filtering occurs when new market rate housing is being constructed faster than the number of households is increasing. The newly constructed housing in excess of household growth frees up existing units for occupancy by other households. In basic economic terms, the supply of housing has increased, and so prices will decrease on existing houses, and some existing units will become affordable. Indeed, every new market rate unit in excess of household growth means an existing unit ultimately becomes affordable, as once all the non-LMI households have housing, the owners of other housing units will have to lower their prices until an LMI household can afford it, or the unit will go vacant. There have been more than 315,000 residential building permits issued since 2000 in New Jersey, and household growth of less than half that number in the same period. Significantly more housing units are being built than the increase in households alone will absorb.

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

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

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

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

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

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

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

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

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

[Ibid]

Subsequent to this decision, COAH engaged Econsult Corporation to create a new filtering methodology based on housing transaction data and a more sophisticated econometric approach for the 2008 Round 3 rules.[72] This calculation was a part of the methodology rejected by the Appellate Court for its "Growth Share" approach in 2010, but the filtering component was not specifically addressed by the court.[73]

The current procedure applies this econometric approach to the filtering calculation.

We follow a three-step process to estimate filtering:

1. We begin with a data set of all housing transactions in New Jersey from 2000-2014 which, when combined with census tract income and housing stock data, lets us measure historic filtering.

2. We then create a model, based on historic filtering measured in step 1, to determine the probability of filtering based on geographical characteristics.

3. We apply the model from step 2 to the municipalities to estimate future filtering on a municipal level.

Each step is described in detail below.

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

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

1 – Identify units that filtered historically

A unit filters if the value of the house changes and the income of the occupant changes significantly as well. In other words, retrospectively, a unit that loses a significant fraction of its market value during the observation period, and is occupied by a lower income household than the previous occupant, is a unit that filtered down. Accordingly, we must measure a unit's price change, and the change in income of its occupants.

To identify when house transactions indicate appreciation or depreciation in house value, a number of variables must be accounted for. House characteristics (e.g. size, age, location, amenities, etc.) and market characteristics (e.g. real estate cycle, macroeconomic effects, etc.) must be taken into consideration to isolate when appreciation or depreciation occurs, as opposed to following a market trend or change in building stock. To achieve this we employ three strategies.

- First, we limit the sample of house sales to paired arms-length transactions; only houses that transact (between a willing buyer and a willing seller) more than once in our sample window (2000 to 2014) are used for analysis. Directly comparing sales of the same unit over time, as opposed to comparing overall transactions by geographic conditions, controls for variation in building stock, age, and quality.

- Second, we assess each pair's change in sale price in terms of the change in that pair's geographic region. To do this we use the paired transactions to construct a weighted repeat sales (WRS) index for each region and the state of New Jersey by year.[74] We compare the change in the price (in percentage terms) of each sale-pair to change (in percentage terms) for the region over the same time period. Comparing individual sales to the index of sales controls for real estate and business cycle effects, as well as other macroeconomic factors.

- Third, we assess each census tract's change in household income relative to the change in household income for the state of New Jersey. Defining this relative change in income also controls for macroeconomic effects. This allows for the identification of census tracts where income has risen as a result of a change in the composition of the population, as opposed to effects of inflation or general economic growth.

In order for a paired transaction to be considered a case of filtering, the appreciation or depreciation represented by that pair must differ significantly from the appreciation or depreciation of the surrounding region.

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[74] The weighted repeat sales index follows the general regression specifications as discussed by Bailey, Muth and Nourse (1963). Simply, a linear regression is conducted using the change in house price of paired transactions and a vector of dummy variables which track the first and second year of each paired transaction. The coefficients from this regression are then exponentiated and indexed.

For each region of New Jersey, we identify which pairs experienced appreciation or depreciation rates greater than one absolute standard deviation from the mean appreciation or depreciation for that region. These cases are categorized as "Appreciated" and "Depreciated" depending on if they are greater than or less than one absolute standard deviation from the regional mean, respectively. Similarly, we identify where household income has changed at a rate greater than or less than one absolute standard deviation from the mean rate of the state of New Jersey. These census tracts are defined as "Increased" if income grew significantly faster than the state or "Decreased" if income grew significantly slower than the state. A "Depreciated" unit in a "Decreased" Census tract is considered to have filtered down, and an "Appreciated" unit in an "Increased" tract filtered up.[75]

While the above analysis gives one definition of filtering, in order to be relevant to LMI households, the analysis must be constrained to units that pass a certain threshold of affordability.[76] Not all of the units that filtered down become affordable to LMI households, and not all units that filtered up became un-affordable. Filtering in wealthy areas will not affect the stock of affordable housing. This type of activity represents unaffordable units that become even more unaffordable, or unaffordable units that decrease in value, but not enough to make them affordable to LMI households. The count of filtered units must be adjusted to represent the universe of units that are currently, or can become, units affordable to LMI households.

An LMI household is identified as having a household income at or below 80% of the median household income in the region. In the absence of property-level income data, the universe of applicable housing units (in terms of income) must be identified by census tract. Using median household income by census tract, we identify what census tracts are likely to have a significant number of LMI households, and what census tracts are likely to have few to no LMI households. To this end, we exclude filtering that takes place in census tracts with median household income above the median household income of the region. We can then calculate, with relevance to LMI households, the percentage of units that filtered up from affordability or filtered down to affordability.

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[75] It is important to note that, in identifying appreciation and income growth, relative appreciation or income growth is not dependent on the absolute direction of that growth. For instance, if a region and a transaction pair both show a negative change in price, but the change exhibited by the transaction pair is significantly less negative than the price change of the region, that transaction pair could be considered as "Appreciated".

[76] We define affordable by converting the observed price of each unit into an (implied) annual cost-of-occupancy. This is done by multiplying the transaction price of the property by the capitalization rate of the property. The capitalization rate is defined as the prevailing mortgage rate at the time of transaction plus the property tax rate of the property. The mortgage rate is obtained by adding 100 basis points to the 10-year treasury yield at the time of transaction. A unit is classified as "Affordable" if the annual cost-of-occupancy is less than or equal to one-third of the income limit, and "Unaffordable" if it is not.

2 – Filtering Model

The filtering model develops a relationship between the characteristics of a community and the likelihood that a unit will filter up, down or not at all.[77] The characteristics of the community include the density of the community, how built out the community is, the city size, the stage of the housing cycle, recent growth in the housing stock, household income, and a region-specific fixed effect.

The model is constructed using a multinomial logit regression. The dependent variable, filtering, can take one of three outcomes: filter up, filter down, or no filtering. The multinomial logit regression assesses the relative likelihood that a housing unit will take one of these three outcomes, given the independent variables shown below.

TABLE 6.3: INDEPENDENT VARIABLES USED IN MULTINOMIAL LOGIT REGRESSION

Variable	Definition	Source
HGrowth00to14	Change in housing stock from 2000 to 2014, per municipality	US Census
hhmedinc	Median Household Income, per census tract	US Census
Hunits	Number of Housing Units, per municipality	US Census
density	Density of municipality housing stock	US Census
pctbuiltout	Percent of estimated "Build Out" limit, per municipality	Econsult
SGrowthNJ	change in WRS index for the State of New Jersey	SRIA sales data, ESI price index
region	COAH Region fixed effect	NJ COAH

The model is estimated using annual data from 2000 to 2014. For estimation, the independent variables were categorically classified into discrete factor variables. Interaction terms of the variables were also added to the specification. For home sales occurring in years without corresponding census data, linear interpolations of the variables are used. Due to the low volatility in the census variables used here (over short-term horizons) linear interpolation is considered an appropriate treatment for this data. The model establishes the outcome of "no filtering" as the base outcome: likelihoods of filtering up or down are expressed relative to the likelihood of not filtering. Coefficients from the multinomial logit regression are expressed as the change in the likelihood of an outcome (with respect to the base outcome), given a unit change in the predictor variable, holding all other variables constant (expressed in log-odd terms).

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

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

3 – Forecasting

To forecast results from the multinomial logit regression, the applicable number of housing units that can potentially filter over the next ten years must be calculated. To account for the number of owner-occupied units that could potentially filter, we use sales data for New Jersey from 2000 to 2014, and multiply this annual average by 10 to apply it to the 2015 to 2025 period. This number is then added to the current number of rental units for each municipality.[78] This yields the base number of housing units in each municipality that can potentially filter over this time period.

The final step is to apply the parameter estimates from the model in step 2 to the 2014 independent variable values for each municipality. As data is modeled at the census tract level, forecasting is estimated at the tract level, and then aggregated at the municipality level. We convert the coefficients from the model into aggregate percent probabilities of filtering up or down per census tract, given the level of the independent variables for each tract in 2014. This percent is then applied to the base of sales and rentals as described above.[79] This approach yields an estimate of upward and downward filtering. This number is aggregated for each municipality, and the difference between the two represents the net number of units estimated to be added to or removed from the stock of affordable housing over the 2015 to 2025 period.

Table 6.4 shows the result of the net filtering estimate on the anticipated supply of affordable housing in each region and statewide (see Appendix C for estimates by municipality). Statewide, downward filtering is anticipated to add approximately 56,600 units of affordable housing supply from 2015 to 2025, while upward filtering is anticipated to reduce affordable housing supply by approximately 26,400. Therefore, net filtering is anticipated to increase affordable housing supply by approximately 30,200 units, reducing affordable housing need.

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[78] Rental units in a housing market respond quickly to changes in real estate prices. If for sale unit prices fall, rental units will as well, otherwise landlords would not attract enough renters, and units would go vacant. Similarly, if for sale units rise, rental units will as well, in the interest of profit maximizing behavior. Given that a certain number of owner-occupied units will filter up or down in value, we believe that the rental market will change in kind.

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

TABLE 6.4: NET FILTERING OF AFFORDABLE HOUSING BY REGION AND STATEWIDE

Region	Units Filtering Down	Units Filtering Up	Net Filtering (Supply Change)
1	12,057	5,375	**6,682**
2	16,492	4,268	**12,224**
3	7,296	3,312	**3,984**
4	9,328	6,509	**2,819**
5	7,835	3,743	**4,092**
6	3,569	3,183	**386**
State	**56,577**	**26,390**	**30,187**

6.4 ALLOCATION OF SECONDARY SOURCES

The Round 2 methodology is clear that secondary source adjustments apply to both Present and Prospective Need, explaining that "reductions apply to housing need no matter how the need was generated." (26 N.J.R. 2348) Further, the Round 2 methodology is explicit that, unlike the municipal allocation process described in Section 5, "in the reductions of increases to housing need due to secondary supply and demand, all municipalities, including Urban Aid locations, participate"[80] (26 N.J.R. 2348). This approach is consistent with the policy allowing Present Need obligations to be addressed either through rehabilitation of deficient units or creation of new units.[81]

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

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[80] Note that this directive makes all the more explicit that secondary source adjustments apply against both Present and Prospective Need – since urban aid municipalities have no Prospective Need assignment, by definition they could not "participate" unless these adjustments could be applied against Present Need. It should also be noted that while qualifying urban aid municipalities do not receive any allocation of the regional Prospective Need, it is possible for those municipalities to have a Secondary Source adjustment that adds to their Prospective Need (in cases where the secondary sources, on net, are estimated to reduce the affordable housing supply in those municipalities). It is therefore possible for a qualifying urban aid municipality to have a Prospective Need greater than zero as a result of secondary source adjustments.

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

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

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

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

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

6.5 SECONDARY SOURCE ADJUSTMENT RESULTS

Table 6.5 shows the results of these adjustments aggregated to the regional level (see Appendix C for estimates by municipality). On net, the three secondary sources of market-based supply (LMI Demolitions, LMI Residential Conversions, and Net Filtering) are estimated to add approximately 31,700 units of affordable housing supply over the ten-year period. Accordingly, aggregate statewide Present Need and Prospective Need decrease by that same figure to reflect adjustments for this anticipated supply. [83]

TABLE 6.5: SECONDARY SOURCE ADJUSTMENTS TO PRESENT NEED AND PROSPECTIVE NEED BY REGION AND STATEWIDE

Region	Present Need	Allocated Prospective Need	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Adjusted Present Need	Adjusted Prospective Need	Aggregate Adjustment
1	28,650	12,542	(3,788)	11,629	6,682	14,523	15,436	11,233	(14,523)
2	21,389	8,529	(3,771)	2,833	12,224	11,286	10,703	7,926	(11,289)
3	7,345	6,575	(1,189)	2,451	3,984	5,246	4,485	4,186	(5,249)
4	7,595	4,976	(4,168)	2,025	2,819	676	5,277	6,625	(669)
5	3,783	5,369	(1,937)	99	4,092	2,254	2,482	4,417	(2,253)
6	2,613	0	(3,800)	1,115	386	(2,299)	1,766	3,151	2,304
State	71,375	37,991	(18,653)	20,152	30,187	31,686	40,149	37,538	(31,679)

Table 6.6 and Figure 6.1 show the results of the secondary source adjustment process described above for two hypothetical municipalities in Region 1. The first municipality is assumed to have a Secondary Source adjustment greater than the sum of their Present and Prospective Need, to illustrate the "zero bound" problem. The second municipality is assumed to have a Secondary Source adjustment less than the sum of their Present and Prospective Need, and thus receives a regional Remaining Secondary Source adjustment. Full results by municipality are shown in Appendix C.

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[83] Slight differences emerge due to rounding, since a municipality cannot be assigned a partial unit.

TABLE 6.6: SAMPLE MUNICIPAL ALLOCATION CALCULATION

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

FIGURE 6.1: SAMPLE MUNICIPAL ALLOCATION OF SECONDARY SOURCE ADJUSTMENTS
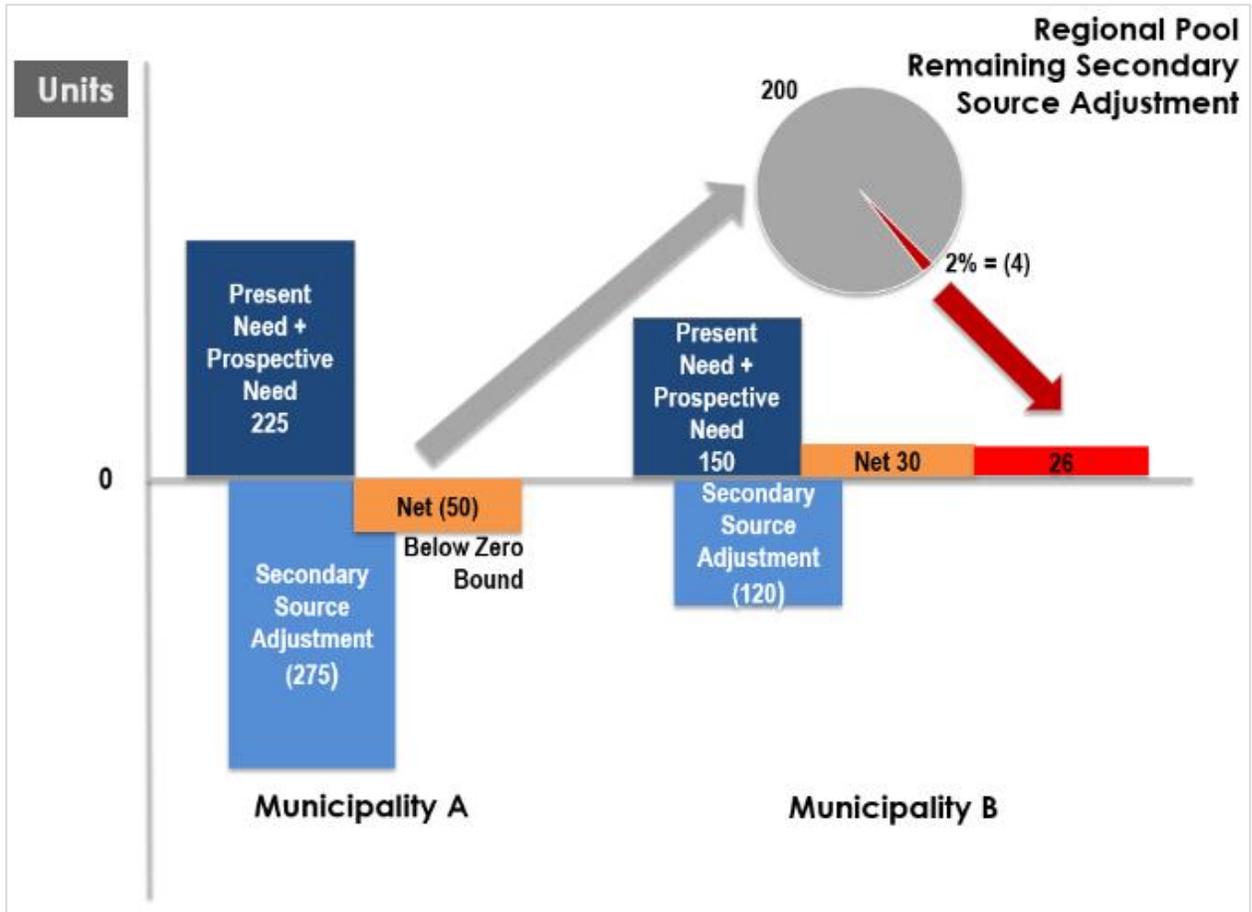
7.0 MUNICIPAL HOUSING OBLIGATIONS

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

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

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

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

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

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

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

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

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

- First, it suggests that the obligations for Round 1 and Round 2 as originally assigned by COAH in 1993 are the appropriate standard against which the "unfulfilled" Prior Round (1987-1999) obligations should be determined, as indicated by the Supreme Court decision. While some previous iterations of the methodology have re-calculated prior cycle obligations retrospectively based on observed data on population and housing activity, such a calculation is not necessary for assigning need because this observed data does not have any bearing on the current or future need for affordable housing. The entirety of current and future need within the FHA framework is represented by Present Need and Prospective Need. Instead, Round 1 and Round 2 obligations are relevant only within the compliance-based framework of municipal *obligation*. As suggested by the Courts, the originally assigned Round 1 and Round 2 obligations provide the municipalities with a defined and predictable target that is the appropriate standard for this purpose.

- Second, while obligations have been legally assigned by COAH and upheld by the Courts for Round 1 and Round 2 (1987-1999), no comparable obligations have been legally assigned and upheld for the "gap period" (1999-2015). Since this period generates no identifiable, additive housing need to that calculated for the current cycle, and the period is not associated with a legally defined obligation against which compliance can reasonably be judged, no calculation of additional need is appropriate to conduct for this period.[86]

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

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

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

Therefore, in keeping with the Supreme Court's decision and the approach in Prior Rounds, the "Single Pool Method" is defined and executed to yield initial summary obligations for each municipality.[88] Within this approach, allocation caps are first applied to the municipal Present Need and Prospective Need emerging from Sections 3-6.[89] Next, the Prior Round (1987-1999) obligations as initially assigned by COAH in 1993 are carried over and summed with the Present Need and Prospective Need to yield an initial summary obligation for each municipality.[90] All applicable adjustments, activity and credits must then be demonstrated by municipalities as part of their efforts to identify the correct number and to secure approval of their affordable housing plans.

7.1 CATEGORIES OF AFFORDABLE HOUSING NEED

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

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

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

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

[88] Section 7.3.2 describes this method in greater detail.

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

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

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

With respect to affordable housing *need*, the circumstances at the beginning of any round of calculations are no different than they were at the start of Round 1. Taken together, Present Need and Prospective Need completely describe the identifiable need for affordable housing within this framework, and any additional calculated *obligation* assigned above and beyond it does not change this *need*. This point can be demonstrated by examining the current circumstances of incremental LMI households that were added to the New Jersey household population in the past. Take for instance an LMI household that moved into the state in 2010.[91] As of the beginning of the current cycle in July 2015, that household by definition is either (a) an LMI household living in deficient housing in New Jersey; (b) an LMI household living in non-deficient housing in New Jersey; or (c) no longer an LMI household living in New Jersey.[92]

- In the case of (a), *an LMI household living in deficient housing as of July 2015*, this household would be captured in the Present Need calculation. To attribute a "need" for the same household based on the addition of that household to the LMI population at a prior point in time, and to then add that "need" to the sum of Present Need and Prospective Need for the upcoming cycle, would be a clear instance of double counting of the same household.

- In the case of (b), *an LMI household living in non-deficient housing as of July 2015,* this household would not represent an identifiable need for the current cycle within the Present Need and Prospective Need framework set forth in the FHA. They would represent neither a source of current, identifiable need for housing (since the household by definition currently has sound housing), nor a source of anticipated housing need emerging from population growth (since the household by definition is a part of the current population). Logically, therefore, the construction or rehabilitation of an additional unit of affordable housing over the upcoming period is not necessary to accommodate it. This is supported by extensive precedent (discussed in more detail below) excluding cost-burden from the categories of affordable housing need considered within the fair share framework.

- Finally, in the case of (c), *no longer an LMI household living in New Jersey,* this household clearly would not represent housing need for the current cycle. Such a household may have moved to another state, increased its income such that it no longer qualifies as LMI, or may no longer exist at all. Regardless, the construction or rehabilitation of an additional

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

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

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

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

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

- In the first case, *people are forced into more crowded housing,* overcrowded housing built before 1960 serves as a metric of housing deficiency in the Present Need calculation. Therefore, if additional LMI households are currently living in old and overcrowded housing as a result of prior population growth, they will be captured in the current Present Need. To calculate a need attributable to those same households from a prior period, and then add that "need" to the Present Need, is a clear instance of double counting in the determination of need for the current period.

- In the second case, *(people are) obliged to pay more than 28 percent of their income for housing*, the Court established in *AMG Realty Co v Warren Tp* that cost-burden factors should not be included in the calculation of low- and moderate-income housing (207 N.J. Super. at 422-423). This point was also confirmed specifically by the Supreme Court's 2015 ruling (221 N.J at 33).[93] More broadly, those LMI households that are living in sound housing units as of the beginning of the upcoming period do not represent an identifiable affordable housing need for that period, regardless of when they were added to the state's population. Put another way, while these households have an *income* need, they do not have a *housing* need, and thus any remedy is outside of the fair share affordable housing framework.

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

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

7.2   PRIOR ROUND VS. GAP PERIOD OBLIGATIONS

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

> …our decision today does not eradicate the prior round obligations; municipalities are expected to fulfill those obligations. As such, prior unfulfilled housing obligations should be the starting point for a determination of a municipality's fair share responsibility. Cf. In re Adoption of N.J.A.C. 5:96 & 5:97, supra, 416 N.J. Super. at 498-500 (approving, as starting point, imposition of "the same prior round obligations [COAH] had established as the second round obligations in 1993").
>
> [221 N.J. 1 at 42)]

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

> COAH's rationale of providing municipalities with **predictability** and the ability to rely upon COAH's substantive certification of their prior round compliance plans constitutes a reasonable basis…
>
> [416 N.J. Super at 500 (emphasis added)]

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

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

understood to represent the most accurate current understanding of municipal Round 1 and Round 2 obligations as originally assigned in 1993. Aggregate Round 1 and Round 2 obligations sum to 85,853 statewide, differing slightly from the total of 85,964 that had been utilized by COAH in 2008.[94]

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

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

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

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

7.3 RECONCILING PRIOR ROUND (1987-1999) OBLIGATIONS

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

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

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

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

7.3.1 OFFSET METHOD

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

- First, applicable adjustments, housing activity and credits for each municipality would be set against the initially assigned Prior Round (1987-1999) obligations, yielding the unfulfilled Prior Round obligations for each municipality. A municipality that has not fully met its obligations would have a remaining obligation; a municipality that has fully met its obligations would have a zero, and a municipality that has more than satisfied their obligation would have credits towards its newly assigned obligation. These unfulfilled Prior Round obligations (or credits) would remain with each municipality and be used as part of the allocation process of Prospective Need for the current cycle.

- The aggregate total of unfulfilled Prior Round obligations would be calculated for each region. This sum would be deducted (or added) to the regional Prospective Need pool of units to be allocated for the current cycle, since those units would remain allocated to specific municipalities within the current cycle.

- The remaining pool of Prospective Need units in each region (which would sum with the aggregate unfulfilled Prior Round obligations to match the Prospective Need as calculated in Section 4 of this report) would be allocated through the municipal allocation formula (as described in Section 5 of this report).

- The sum of obligations for each municipality would be 1) their unfulfilled Prior Round (1987-1999) obligation, if any, 2) their portion of the remaining regional Prospective Need, and 3) their Present Need. Adjustments would be made for secondary sources and municipal allocation caps. When aggregated regionally, the sum of these obligations (prior to adjustments) aligns with the sum of identified Present Need and Prospective Need for the current cycle.

- This approach both rewards compliance and aligns aggregate obligations with aggregate need. Since unfulfilled obligations are carried over from cycle to cycle, rather than reset, municipalities are appropriately rewarded for activity undertaken to satisfy that obligation, and remain responsible for the unfulfilled portion. Concurrently, aggregate affordable housing obligations in each region are aligned with the identified housing need for the period.

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

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

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

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

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

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

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

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

7.3.2 SINGLE POOL METHOD

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

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

- Calculate the Present Need and Prospective Need for each municipality through the procedures described in Sections 3-6 of this report.

- Applying the municipal allocation caps included in the Round 2 methodology and Fair Housing Act to those Present Need and Prospective Need obligations, yielding a Capped Present Need and Capped Prospective Need for each municipality.[96]

- Sum the Initial Prior Round Obligations (as assigned by COAH in Round 2) with Capped Present Need and Capped Prospective Need to yield an Initial Summary Obligation for each municipality.

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

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

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

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

7.4   MUNICIPAL ALLOCATION CAPS

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

1. The 20% cap applies to "new construction" need (i.e. Prospective Need) and was included in both the Round 1 and Round 2 methodologies to implement the Legislature's desire to avoid fair share obligations resulting in "the established pattern of development in a community (being) drastically altered" (N.J.S.A. 52:27D-307 c.2(b)).

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

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

7.4.1 20% CAP

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

> The derivation of this limit reflects a desire by COAH not to overwhelm local communities….such that the community would experience 'drastic alteration' from these activities. 'Drastic alteration' has been defined as the doubling of a community's housing stock due to the presence of both inclusionary affordable housing and simultaneously delivered market units at a rate of 1:4.[98]
>
> [26 N.J.R. 2350]

We replicate this methodology after developing an estimate of occupied units as of June 30, 2015 (the start of the Prospective Need period). This estimate starts with occupied units by municipality as reported in the 2009-2013 American Community Survey. To this base, it adds certificates of occupancy and subtracts demolitions from the January 2014 – June 2015 period (as reported by DCA, by municipality) to update the estimate of occupied units to June 30, 2015.

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

Table 7.1 shows the impact of the application of the 20% cap on the sum of municipal Prospective Need obligations by region and statewide. In total, 8 municipalities are impacted by this cap, reducing their aggregate obligation by approximately 600 units.

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

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

Region	Adjusted Prospective Need	Municipalities Impacted by 20% Cap	Capped Units (20% Cap)	Revised Prospective Need (20% Cap)
1	11,233	3	(268)	10,965
2	7,926	0	0	7,926
3	4,186	0	0	4,186
4	6,625	0	0	6,625
5	4,417	2	(13)	4,404
6	3,151	3	(316)	2,835
State	**37,538**	**8**	**(597)**	**36,941**

7.4.2 1,000 UNIT CAP

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

> No municipality shall be required to address a **fair share of housing units** affordable to households with a gross household income of less than 80% of the median gross household income beyond 1,000 units within ten years.
>
> [N.J.S.A 52:27D-307 e. (emphasis added)]

The phrase "fair share" also appears earlier in Section 307 of the FHA, where COAH is given the duty to "adopt criteria and guidelines for: Municipal determination of its present and prospective fair share of the housing need in a given region…" (N.J.S.A 52:27D-307 c.1). This definition was incorporated by COAH into amendments to its Round 2 methodology,[99] which applied the 1,000 unit cap against the sum of all housing obligations.[100]

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

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[99] See: N.J.A.C. 5:93-14.1, which begins "No municipality shall be required to address a fair share beyond 1,000 units…"

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

preceding ten-year period, since this activity demonstrates that "it is likely" that the municipality could "create a realistic opportunity" for more than 1,000 LMI units within the ten-year period.[101] Pursuant to this standard, data on certificates of occupancy (as reported by DCA, by municipality) are aggregated from 2005 to 2014 to determine if any municipalities have exceeded 5,000 certificates of occupancy over the previous ten years, and are thus not eligible for application of the 1,000 unit cap. Both Jersey City[102] and Newark have issued more than 5,000 CO's and are therefore not eligible for this cap.

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

Table 7.2 shows the impact of the application of the 1,000 unit cap on the sum of municipal Present and Prospective Need obligations by region and statewide. In total, 4 municipalities are impacted by this cap, reducing their aggregate obligation by approximately 5,000 units.

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

[102] While the sum of Newark's Present Need and Prospective Need is less than 1,000 units, the sum of Jersey City's Present Need and Prospective Need is 1,740 units, which remains uncapped due to this provision. It is unclear if a higher cap may apply to Jersey City based on its level of growth over 10 years (in which it issued 5,523 Certificates of Occupancy), rather than no cap at all. For example, the 5,000 certificate of occupancy threshold is the basis for a determination that more than 1,000 units are "realistic," the same ratio of 5:1 would imply a cap of 1,105 (5,523 / 5).

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

Region	Adjusted Present Need	Revised Prospective Need[103]	Municipalities Impacted by 1,000 Unit Cap	Capped Units (1,000 Cap)	Capped Present Need	Capped Prospective Need
1	15,436	10,965	2	(3,540)	11,896	10,965
2	10,703	7,926	2	(1,525)	9,178	7,926
3	4,485	4,186	0	0	4,485	4,186
4	5,277	6,625	0	0	5,277	6,625
5	2,482	4,404	0	0	2,482	4,404
6	1,766	2,835	0	0	1,766	2,835
State	**40,149**	**36,941**	**4**	**(5,065)**	**35,084**	**36,941**

7.4.3 MUNICIPAL ALLOCATION CAP RESULTS

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

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

Region	Adjusted Present Need	Adjusted Prospective Need	Munis w/ 20% Cap	Capped Units (20% Cap)	Munis w/ 1,000 Unit Cap	Capped Units (1,000 Cap)	Capped Present Need	Capped Prospective Need
1	15,436	11,233	3	(268)	2	(3,540)	11,896	10,965
2	10,703	7,926	0	0	2	(1,525)	9,178	7,926
3	4,485	4,186	0	0	0	0	4,485	4,186
4	5,277	6,625	0	0	0	0	5,277	6,625
5	2,482	4,417	2	(13)	0	0	2,482	4,404
6	1,766	3,151	3	(316)	0	0	1,766	2,835
State	**40,149**	**37,538**	**8**	**(597)**	**4**	**(5,065)**	**35,084**	**36,941**

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

7.5   INITIAL SUMMARY OBLIGATIONS

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

TABLE 7.4: INITIAL SUMMARY OBLIGATIONS BY REGION AND STATEWIDE

Region	Prior Round (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation
1	12,469	11,896	10,965	**35,330**
2	9,382	9,178	7,926	**26,486**
3	13,323	4,485	4,186	**21,994**
4	27,367	5,277	6,625	**39,269**
5	14,055	2,482	4,404	**20,941**
6	9,257	1,766	2,835	**13,858**
State	**85,853**	**35,084**	**36,941**	**157,878**

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

APPENDIX A: PRESENT NEED BY MUNICIPALITY

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

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Allendale borough	Bergen	1	0	0	25	25	68.7%	17
Alpine borough	Bergen	1	0	0	5	5	68.7%	3
Bergenfield borough	Bergen	1	30	176	36	242	68.7%	166
Bogota borough	Bergen	1	52	20	45	117	68.7%	80
Carlstadt borough	Bergen	1	0	46	0	46	68.7%	32
Cliffside Park borough	Bergen	1	12	195	47	254	68.7%	175
Closter borough	Bergen	1	0	0	0	0	68.7%	0
Cresskill borough	Bergen	1	12	16	41	69	68.7%	47
Demarest borough	Bergen	1	0	0	0	0	68.7%	0
Dumont borough	Bergen	1	0	49	9	58	68.7%	40
East Rutherford borough	Bergen	1	124	41	119	284	68.7%	195
Edgewater borough	Bergen	1	0	4	0	4	68.7%	3
Elmwood Park borough	Bergen	1	0	98	0	98	68.7%	67
Emerson borough	Bergen	1	0	0	88	88	68.7%	60
Englewood city	Bergen	1	81	367	113	561	68.7%	385
Englewood Cliffs borough	Bergen	1	0	2	0	2	68.7%	1
Fair Lawn borough	Bergen	1	87	69	75	231	68.7%	159
Fairview borough	Bergen	1	77	271	66	414	68.7%	284
Fort Lee borough	Bergen	1	49	248	97	394	68.7%	271
Franklin Lakes borough	Bergen	1	23	2	20	45	68.7%	31
Garfield city	Bergen	1	15	199	61	275	68.7%	189
Glen Rock borough	Bergen	1	0	18	3	21	68.7%	14
Hackensack city	Bergen	1	143	475	206	824	68.7%	566
Harrington Park borough	Bergen	1	0	7	0	7	68.7%	5
Hasbrouck Heights borough	Bergen	1	0	94	0	94	68.7%	65
Haworth borough	Bergen	1	0	0	0	0	68.7%	0
Hillsdale borough	Bergen	1	0	20	0	20	68.7%	14
Ho-Ho-Kus borough	Bergen	1	0	11	0	11	68.7%	8
Leonia borough	Bergen	1	10	104	0	114	68.7%	78
Little Ferry borough	Bergen	1	52	107	53	212	68.7%	146
Lodi borough	Bergen	1	50	129	118	297	68.7%	204
Lyndhurst township	Bergen	1	95	95	103	293	68.7%	201
Mahwah township	Bergen	1	41	24	35	100	68.7%	69
Maywood borough	Bergen	1	0	29	15	44	68.7%	30
Midland Park borough	Bergen	1	0	0	46	46	68.7%	32
Montvale borough	Bergen	1	0	6	0	6	68.7%	4
Moonachie borough	Bergen	1	14	14	12	40	68.7%	27

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
New Milford borough	Bergen	1	0	63	9	72	68.7%	49
North Arlington borough	Bergen	1	78	62	91	231	68.7%	159
Northvale borough	Bergen	1	0	8	0	8	68.7%	5
Norwood borough	Bergen	1	0	3	0	3	68.7%	2
Oakland borough	Bergen	1	9	0	36	45	68.7%	31
Old Tappan borough	Bergen	1	0	3	16	19	68.7%	13
Oradell borough	Bergen	1	0	18	0	18	68.7%	12
Palisades Park borough	Bergen	1	0	197	45	242	68.7%	166
Paramus borough	Bergen	1	15	72	127	214	68.7%	147
Park Ridge borough	Bergen	1	22	76	63	161	68.7%	111
Ramsey borough	Bergen	1	8	53	7	68	68.7%	47
Ridgefield borough	Bergen	1	55	99	47	201	68.7%	138
Ridgefield Park village	Bergen	1	57	128	49	234	68.7%	161
Ridgewood village	Bergen	1	0	15	23	38	68.7%	26
River Edge borough	Bergen	1	0	60	0	60	68.7%	41
River Vale township	Bergen	1	0	8	22	30	68.7%	21
Rochelle Park township	Bergen	1	0	0	0	0	68.7%	0
Rockleigh borough	Bergen	1	0	0	0	0	68.7%	0
Rutherford borough	Bergen	1	48	146	41	235	68.7%	161
Saddle Brook township	Bergen	1	0	58	0	58	68.7%	40
Saddle River borough	Bergen	1	0	10	65	75	68.7%	52
South Hackensack township	Bergen	1	36	16	31	83	68.7%	57
Teaneck township	Bergen	1	18	122	73	213	68.7%	146
Tenafly borough	Bergen	1	0	47	0	47	68.7%	32
Teterboro borough	Bergen	1	0	0	0	0	68.7%	0
Upper Saddle River borough	Bergen	1	0	9	0	9	68.7%	6
Waldwick borough	Bergen	1	39	15	34	88	68.7%	60
Wallington borough	Bergen	1	21	90	31	142	68.7%	98
Washington township	Bergen	1	0	0	0	0	68.7%	0
Westwood borough	Bergen	1	15	35	34	84	68.7%	58
Woodcliff Lake borough	Bergen	1	0	7	17	24	68.7%	16
Wood-Ridge borough	Bergen	1	0	0	0	0	68.7%	0
Wyckoff township	Bergen	1	0	0	66	66	68.7%	45
Bayonne city	Hudson	1	57	870	163	1,090	68.9%	751
East Newark borough	Hudson	1	12	5	8	25	68.9%	17
Guttenberg town	Hudson	1	13	63	19	95	68.9%	65
Harrison town	Hudson	1	72	212	76	360	68.9%	248
Hoboken city	Hudson	1	120	255	104	479	68.9%	330
Jersey City	Hudson	1	1,088	4,028	1,528	6,644	68.9%	4,581
Kearny town	Hudson	1	29	301	65	395	68.9%	272
North Bergen township	Hudson	1	205	747	278	1,230	68.9%	848
Secaucus town	Hudson	1	0	69	15	84	68.9%	58
Union City	Hudson	1	278	2,070	351	2,699	68.9%	1,861

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Weehawken township	Hudson	1	0	236	61	297	68.9%	205
West New York town	Hudson	1	27	1,143	209	1,379	68.9%	951
Bloomingdale borough	Passaic	1	0	55	0	55	78.3%	43
Clifton city	Passaic	1	56	1,933	24	2,013	78.3%	1,575
Haledon borough	Passaic	1	13	85	0	98	78.3%	77
Hawthorne borough	Passaic	1	12	74	4	90	78.3%	70
Little Falls township	Passaic	1	43	59	11	113	78.3%	88
North Haledon borough	Passaic	1	0	0	0	0	78.3%	0
Passaic city	Passaic	1	193	5,443	63	5,699	78.3%	4,460
Paterson city	Passaic	1	157	4,240	46	4,443	78.3%	3,477
Pompton Lakes borough	Passaic	1	0	58	0	58	78.3%	45
Prospect Park borough	Passaic	1	0	55	0	55	78.3%	43
Ringwood borough	Passaic	1	3	14	1	18	78.3%	14
Totowa borough	Passaic	1	10	105	4	119	78.3%	93
Wanaque borough	Passaic	1	35	39	0	74	78.3%	58
Wayne township	Passaic	1	117	49	28	194	78.3%	152
West Milford township	Passaic	1	41	22	7	70	78.3%	55
Woodland Park borough	Passaic	1	0	195	8	203	78.3%	159
Andover borough	Sussex	1	0	0	0	0	62.7%	0
Andover township	Sussex	1	0	1	7	8	62.7%	5
Branchville borough	Sussex	1	0	0	2	2	62.7%	1
Byram township	Sussex	1	5	12	25	42	62.7%	26
Frankford township	Sussex	1	29	2	12	43	62.7%	27
Franklin borough	Sussex	1	0	19	14	33	62.7%	21
Fredon township	Sussex	1	7	0	24	31	62.7%	19
Green township	Sussex	1	0	0	0	0	62.7%	0
Hamburg borough	Sussex	1	0	18	0	18	62.7%	11
Hampton township	Sussex	1	5	0	5	10	62.7%	6
Hardyston township	Sussex	1	0	5	23	28	62.7%	18
Hopatcong borough	Sussex	1	30	18	29	77	62.7%	48
Lafayette township	Sussex	1	0	0	0	0	62.7%	0
Montague township	Sussex	1	0	0	0	0	62.7%	0
Newton town	Sussex	1	59	87	86	232	62.7%	145
Ogdensburg borough	Sussex	1	0	1	8	9	62.7%	6
Sandyston township	Sussex	1	0	2	6	8	62.7%	5
Sparta township	Sussex	1	24	2	19	45	62.7%	28
Stanhope borough	Sussex	1	0	8	0	8	62.7%	5
Stillwater township	Sussex	1	0	0	0	0	62.7%	0
Sussex borough	Sussex	1	4	0	12	16	62.7%	10
Vernon township	Sussex	1	0	62	0	62	62.7%	39
Walpack township	Sussex	1	0	0	0	0	62.7%	0
Wantage township	Sussex	1	0	2	5	7	62.7%	4
Belleville township	Essex	2	173	894	176	1,243	75.4%	938

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Bloomfield township	Essex	2	107	479	113	699	75.4%	527
Caldwell borough	Essex	2	0	13	22	35	75.4%	26
Cedar Grove township	Essex	2	0	21	0	21	75.4%	16
City of Orange township	Essex	2	133	1,021	197	1,351	75.4%	1,019
East Orange city	Essex	2	165	504	303	972	75.4%	733
Essex Fells borough	Essex	2	0	0	0	0	75.4%	0
Fairfield township	Essex	2	0	0	67	67	75.4%	51
Glen Ridge borough	Essex	2	19	0	16	35	75.4%	26
Irvington township	Essex	2	222	802	287	1,311	75.4%	989
Livingston township	Essex	2	15	0	19	34	75.4%	26
Maplewood township	Essex	2	0	106	52	158	75.4%	119
Millburn township	Essex	2	60	68	25	153	75.4%	115
Montclair township	Essex	2	17	94	67	178	75.4%	134
Newark city	Essex	2	837	3,417	1,238	5,492	75.4%	4,143
North Caldwell borough	Essex	2	12	14	10	36	75.4%	27
Nutley township	Essex	2	9	386	8	403	75.4%	304
Roseland borough	Essex	2	0	0	0	0	75.4%	0
S. Orange Village township	Essex	2	0	7	0	7	75.4%	5
Verona township	Essex	2	0	17	0	17	75.4%	13
West Caldwell township	Essex	2	8	24	22	54	75.4%	41
West Orange township	Essex	2	45	245	224	514	75.4%	388
Boonton town	Morris	2	25	37	5	67	53.9%	36
Boonton township	Morris	2	0	4	30	34	53.9%	18
Butler borough	Morris	2	0	45	5	50	53.9%	27
Chatham borough	Morris	2	0	0	0	0	53.9%	0
Chatham township	Morris	2	0	26	59	85	53.9%	46
Chester borough	Morris	2	11	0	7	18	53.9%	10
Chester township	Morris	2	23	0	15	38	53.9%	20
Denville township	Morris	2	41	13	11	65	53.9%	35
Dover town	Morris	2	115	255	83	453	53.9%	244
East Hanover township	Morris	2	16	0	35	51	53.9%	27
Florham Park borough	Morris	2	0	4	115	119	53.9%	64
Hanover township	Morris	2	0	21	23	44	53.9%	24
Harding township	Morris	2	0	0	0	0	53.9%	0
Jefferson township	Morris	2	40	5	48	93	53.9%	50
Kinnelon borough	Morris	2	0	3	0	3	53.9%	2
Lincoln Park borough	Morris	2	12	9	0	21	53.9%	11
Long Hill township	Morris	2	0	10	9	19	53.9%	10
Madison borough	Morris	2	0	18	12	30	53.9%	16
Mendham borough	Morris	2	9	0	6	15	53.9%	8
Mendham township	Morris	2	30	0	0	30	53.9%	16
Mine Hill township	Morris	2	0	5	0	5	53.9%	3
Montville township	Morris	2	12	5	8	25	53.9%	13

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Morris township	Morris	2	23	9	15	47	53.9%	25
Morris Plains borough	Morris	2	0	13	35	48	53.9%	26
Morristown town	Morris	2	61	174	13	248	53.9%	134
Mountain Lakes borough	Morris	2	0	2	0	2	53.9%	1
Mount Arlington borough	Morris	2	0	1	24	25	53.9%	13
Mount Olive township	Morris	2	62	19	129	210	53.9%	113
Netcong borough	Morris	2	7	11	11	29	53.9%	16
Parsippany-Troy Hills twp	Morris	2	89	116	116	321	53.9%	173
Pequannock township	Morris	2	49	0	55	104	53.9%	56
Randolph township	Morris	2	0	22	29	51	53.9%	27
Riverdale borough	Morris	2	0	3	0	3	53.9%	2
Rockaway borough	Morris	2	0	24	0	24	53.9%	13
Rockaway township	Morris	2	6	32	4	42	53.9%	23
Roxbury township	Morris	2	12	4	28	44	53.9%	24
Victory Gardens borough	Morris	2	3	20	0	23	53.9%	12
Washington township	Morris	2	7	6	0	13	53.9%	7
Wharton borough	Morris	2	34	83	23	140	53.9%	75
Berkeley Heights township	Union	2	8	10	0	18	75.7%	14
Clark township	Union	2	6	26	7	39	75.7%	30
Cranford township	Union	2	0	49	62	111	75.7%	84
Elizabeth city	Union	2	750	5,466	450	6,666	75.7%	5,045
Fanwood borough	Union	2	0	0	21	21	75.7%	16
Garwood borough	Union	2	10	29	5	44	75.7%	33
Hillside township	Union	2	66	241	30	337	75.7%	255
Kenilworth borough	Union	2	0	3	0	3	75.7%	2
Linden city	Union	2	73	379	87	539	75.7%	408
Mountainside borough	Union	2	80	0	60	140	75.7%	106
New Providence borough	Union	2	0	70	0	70	75.7%	53
Plainfield city	Union	2	114	1,084	83	1,281	75.7%	969
Rahway city	Union	2	8	126	62	196	75.7%	148
Roselle borough	Union	2	49	213	62	324	75.7%	245
Roselle Park borough	Union	2	17	97	8	122	75.7%	92
Scotch Plains township	Union	2	28	45	31	104	75.7%	79
Springfield township	Union	2	0	3	0	3	75.7%	2
Summit city	Union	2	91	33	67	191	75.7%	145
Union township	Union	2	26	424	23	473	75.7%	358
Westfield town	Union	2	18	37	29	84	75.7%	64
Winfield township	Union	2	0	28	0	28	75.7%	21
Allamuchy township	Warren	2	40	0	20	60	77.7%	47
Alpha borough	Warren	2	11	2	0	13	77.7%	10
Belvidere town	Warren	2	0	0	13	13	77.7%	10
Blairstown township	Warren	2	0	0	0	0	77.7%	0
Franklin township	Warren	2	0	0	0	0	77.7%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Frelinghuysen township	Warren	2	0	0	0	0	77.7%	0
Greenwich township	Warren	2	0	0	0	0	77.7%	0
Hackettstown town	Warren	2	0	148	0	148	77.7%	115
Hardwick township	Warren	2	2	1	0	3	77.7%	2
Harmony township	Warren	2	0	1	0	1	77.7%	1
Hope township	Warren	2	4	1	0	5	77.7%	4
Independence township	Warren	2	0	0	0	0	77.7%	0
Knowlton township	Warren	2	0	7	13	20	77.7%	16
Liberty township	Warren	2	0	0	0	0	77.7%	0
Lopatcong township	Warren	2	0	0	0	0	77.7%	0
Mansfield township	Warren	2	0	20	0	20	77.7%	16
Oxford township	Warren	2	16	11	0	27	77.7%	21
Phillipsburg town	Warren	2	45	107	75	227	77.7%	176
Pohatcong township	Warren	2	0	8	0	8	77.7%	6
Washington borough	Warren	2	0	13	12	25	77.7%	19
Washington township	Warren	2	0	7	0	7	77.7%	5
White township	Warren	2	15	0	65	80	77.7%	62
Alexandria township	Hunterdon	3	20	0	9	29	100.0%	29
Bethlehem township	Hunterdon	3	0	4	0	4	100.0%	4
Bloomsbury borough	Hunterdon	3	0	2	0	2	100.0%	2
Califon borough	Hunterdon	3	0	0	0	0	100.0%	0
Clinton town	Hunterdon	3	0	17	0	17	100.0%	17
Clinton township	Hunterdon	3	12	0	5	17	100.0%	17
Delaware township	Hunterdon	3	14	7	0	21	100.0%	21
East Amwell township	Hunterdon	3	0	3	0	3	100.0%	3
Flemington borough	Hunterdon	3	0	72	0	72	100.0%	72
Franklin township	Hunterdon	3	0	0	0	0	100.0%	0
Frenchtown borough	Hunterdon	3	0	0	1	1	100.0%	1
Glen Gardner borough	Hunterdon	3	3	3	1	7	100.0%	7
Hampton borough	Hunterdon	3	0	14	0	14	100.0%	14
High Bridge borough	Hunterdon	3	0	42	0	42	100.0%	42
Holland township	Hunterdon	3	59	0	21	80	100.0%	80
Kingwood township	Hunterdon	3	0	5	0	5	100.0%	5
Lambertville city	Hunterdon	3	37	11	16	64	100.0%	64
Lebanon borough	Hunterdon	3	0	4	0	4	100.0%	4
Lebanon township	Hunterdon	3	0	3	0	3	100.0%	3
Milford borough	Hunterdon	3	0	1	0	1	100.0%	1
Raritan township	Hunterdon	3	0	2	21	23	100.0%	23
Readington township	Hunterdon	3	69	0	31	100	100.0%	100
Stockton borough	Hunterdon	3	0	0	0	0	100.0%	0
Tewksbury township	Hunterdon	3	0	0	0	0	100.0%	0
Union township	Hunterdon	3	0	1	0	1	100.0%	1
West Amwell township	Hunterdon	3	0	0	0	0	100.0%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Carteret borough	Middlesex	3	7	184	5	196	65.8%	129
Cranbury township	Middlesex	3	0	6	0	6	65.8%	4
Dunellen borough	Middlesex	3	0	12	0	12	65.8%	8
East Brunswick township	Middlesex	3	16	48	62	126	65.8%	83
Edison township	Middlesex	3	158	391	242	791	65.8%	520
Helmetta borough	Middlesex	3	0	8	0	8	65.8%	5
Highland Park borough	Middlesex	3	0	92	23	115	65.8%	76
Jamesburg borough	Middlesex	3	0	45	0	45	65.8%	30
Metuchen borough	Middlesex	3	32	46	27	105	65.8%	69
Middlesex borough	Middlesex	3	41	47	0	88	65.8%	58
Milltown borough	Middlesex	3	0	44	0	44	65.8%	29
Monroe township	Middlesex	3	41	0	130	171	65.8%	112
New Brunswick city	Middlesex	3	204	1,523	227	1,954	65.8%	1,285
North Brunswick township	Middlesex	3	29	188	49	266	65.8%	175
Old Bridge township	Middlesex	3	74	148	56	278	65.8%	183
Perth Amboy city	Middlesex	3	116	941	123	1,180	65.8%	776
Piscataway township	Middlesex	3	96	222	80	398	65.8%	262
Plainsboro township	Middlesex	3	0	18	0	18	65.8%	12
Sayreville borough	Middlesex	3	42	115	42	199	65.8%	131
South Amboy city	Middlesex	3	0	50	0	50	65.8%	33
South Brunswick township	Middlesex	3	22	38	120	180	65.8%	118
South Plainfield borough	Middlesex	3	34	48	16	98	65.8%	64
South River borough	Middlesex	3	45	139	38	222	65.8%	146
Spotswood borough	Middlesex	3	0	20	0	20	65.8%	13
Woodbridge township	Middlesex	3	38	452	65	555	65.8%	365
Bedminster township	Somerset	3	0	2	0	2	66.3%	1
Bernards township	Somerset	3	10	0	50	60	66.3%	40
Bernardsville borough	Somerset	3	0	4	0	4	66.3%	3
Bound Brook borough	Somerset	3	0	129	24	153	66.3%	101
Branchburg township	Somerset	3	0	2	13	15	66.3%	10
Bridgewater township	Somerset	3	7	53	171	231	66.3%	153
Far Hills borough	Somerset	3	0	3	0	3	66.3%	2
Franklin township	Somerset	3	0	86	77	163	66.3%	108
Green Brook township	Somerset	3	14	0	0	14	66.3%	9
Hillsborough township	Somerset	3	15	10	77	102	66.3%	68
Manville borough	Somerset	3	94	81	84	259	66.3%	172
Millstone borough	Somerset	3	0	0	0	0	66.3%	0
Montgomery township	Somerset	3	56	2	52	110	66.3%	73
North Plainfield borough	Somerset	3	58	362	104	524	66.3%	347
Peapack & Gladstone bor.	Somerset	3	0	2	0	2	66.3%	1
Raritan borough	Somerset	3	29	16	29	74	66.3%	49
Rocky Hill borough	Somerset	3	0	0	3	3	66.3%	2
Somerville borough	Somerset	3	33	86	56	175	66.3%	116

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
South Bound Brook borough	Somerset	3	50	19	62	131	66.3%	87
Warren township	Somerset	3	0	17	83	100	66.3%	66
Watchung borough	Somerset	3	6	0	30	36	66.3%	24
East Windsor township	Mercer	4	18	22	64	104	55.5%	58
Ewing township	Mercer	4	26	103	37	166	55.5%	92
Hamilton township	Mercer	4	193	342	147	682	55.5%	378
Hightstown borough	Mercer	4	32	8	25	65	55.5%	36
Hopewell borough	Mercer	4	9	1	10	20	55.5%	11
Hopewell township	Mercer	4	0	0	0	0	55.5%	0
Lawrence township	Mercer	4	8	49	25	82	55.5%	45
Pennington borough	Mercer	4	29	8	54	91	55.5%	50
Princeton	Mercer	4	20	78	48	146	55.5%	81
Robbinsville township	Mercer	4	0	0	33	33	55.5%	18
Trenton city	Mercer	4	186	1,132	255	1,573	55.5%	872
West Windsor township	Mercer	4	63	28	86	177	55.5%	98
Aberdeen township	Monmouth	4	53	21	46	120	67.6%	81
Allenhurst borough	Monmouth	4	0	3	2	5	67.6%	3
Allentown borough	Monmouth	4	5	0	8	13	67.6%	9
Asbury Park city	Monmouth	4	60	333	52	445	67.6%	301
Atlantic Highlands borough	Monmouth	4	54	0	39	93	67.6%	63
Avon-by-the-Sea borough	Monmouth	4	0	4	0	4	67.6%	3
Belmar borough	Monmouth	4	22	41	25	88	67.6%	59
Bradley Beach borough	Monmouth	4	0	4	30	34	67.6%	23
Brielle borough	Monmouth	4	7	0	6	13	67.6%	9
Colts Neck township	Monmouth	4	0	1	18	19	67.6%	13
Deal borough	Monmouth	4	2	1	0	3	67.6%	2
Eatontown borough	Monmouth	4	71	26	62	159	67.6%	107
Englishtown borough	Monmouth	4	0	0	53	53	67.6%	36
Fair Haven borough	Monmouth	4	0	0	0	0	67.6%	0
Farmingdale borough	Monmouth	4	0	5	0	5	67.6%	3
Freehold borough	Monmouth	4	50	222	109	381	67.6%	258
Freehold township	Monmouth	4	46	2	80	128	67.6%	87
Hazlet township	Monmouth	4	10	13	17	40	67.6%	27
Highlands borough	Monmouth	4	0	76	0	76	67.6%	51
Holmdel township	Monmouth	4	0	0	59	59	67.6%	40
Howell township	Monmouth	4	30	56	32	118	67.6%	80
Interlaken borough	Monmouth	4	2	0	2	4	67.6%	3
Keansburg borough	Monmouth	4	32	82	69	183	67.6%	124
Keyport borough	Monmouth	4	0	28	0	28	67.6%	19
Lake Como borough	Monmouth	4	0	11	0	11	67.6%	7
Little Silver borough	Monmouth	4	0	0	11	11	67.6%	7
Loch Arbour village	Monmouth	4	0	0	0	0	67.6%	0
Long Branch city	Monmouth	4	38	364	95	497	67.6%	336

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Manalapan township	Monmouth	4	59	2	86	147	67.6%	99
Manasquan borough	Monmouth	4	0	0	15	15	67.6%	10
Marlboro township	Monmouth	4	52	0	105	157	67.6%	106
Matawan borough	Monmouth	4	27	40	24	91	67.6%	62
Middletown township	Monmouth	4	49	75	159	283	67.6%	191
Millstone township	Monmouth	4	0	0	44	44	67.6%	30
Monmouth Beach borough	Monmouth	4	0	0	0	0	67.6%	0
Neptune township	Monmouth	4	56	50	73	179	67.6%	121
Neptune City borough	Monmouth	4	16	2	0	18	67.6%	12
Ocean township	Monmouth	4	27	62	30	119	67.6%	80
Oceanport borough	Monmouth	4	0	0	0	0	67.6%	0
Red Bank borough	Monmouth	4	0	180	0	180	67.6%	122
Roosevelt borough	Monmouth	4	0	8	0	8	67.6%	5
Rumson borough	Monmouth	4	0	15	20	35	67.6%	24
Sea Bright borough	Monmouth	4	8	8	7	23	67.6%	16
Sea Girt borough	Monmouth	4	0	0	0	0	67.6%	0
Shrewsbury borough	Monmouth	4	11	0	0	11	67.6%	7
Shrewsbury township	Monmouth	4	0	6	29	35	67.6%	24
Spring Lake borough	Monmouth	4	0	0	44	44	67.6%	30
Spring Lake Heights bor.	Monmouth	4	0	11	18	29	67.6%	20
Tinton Falls borough	Monmouth	4	20	6	119	145	67.6%	98
Union Beach borough	Monmouth	4	0	60	17	77	67.6%	52
Upper Freehold township	Monmouth	4	27	8	24	59	67.6%	40
Wall township	Monmouth	4	0	36	133	169	67.6%	114
West Long Branch borough	Monmouth	4	0	15	0	15	67.6%	10
Barnegat township	Ocean	4	16	33	11	60	77.3%	46
Barnegat Light borough	Ocean	4	12	0	2	14	77.3%	11
Bay Head borough	Ocean	4	0	0	2	2	77.3%	2
Beach Haven borough	Ocean	4	0	2	0	2	77.3%	2
Beachwood borough	Ocean	4	0	10	0	10	77.3%	8
Berkeley township	Ocean	4	57	10	45	112	77.3%	87
Brick township	Ocean	4	75	78	193	346	77.3%	267
Eagleswood township	Ocean	4	0	0	0	0	77.3%	0
Harvey Cedars borough	Ocean	4	1	0	1	2	77.3%	2
Island Heights borough	Ocean	4	0	1	2	3	77.3%	2
Jackson township	Ocean	4	12	18	44	74	77.3%	57
Lacey township	Ocean	4	35	18	31	84	77.3%	65
Lakehurst borough	Ocean	4	0	18	2	20	77.3%	15
Lakewood township	Ocean	4	123	387	182	692	77.3%	535
Lavallette borough	Ocean	4	0	0	0	0	77.3%	0
Little Egg Harbor township	Ocean	4	120	29	30	179	77.3%	138
Long Beach township	Ocean	4	0	0	16	16	77.3%	12
Manchester township	Ocean	4	100	2	61	163	77.3%	126

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Mantoloking borough	Ocean	4	0	0	0	0	77.3%	0
Ocean township	Ocean	4	0	0	10	10	77.3%	8
Ocean Gate borough	Ocean	4	0	5	8	13	77.3%	10
Pine Beach borough	Ocean	4	0	0	4	4	77.3%	3
Plumsted township	Ocean	4	0	17	0	17	77.3%	13
Point Pleasant borough	Ocean	4	0	16	0	16	77.3%	12
Point Pleasant Beach bor.	Ocean	4	0	53	0	53	77.3%	41
Seaside Heights borough	Ocean	4	50	67	35	152	77.3%	118
Seaside Park borough	Ocean	4	17	0	16	33	77.3%	26
Ship Bottom borough	Ocean	4	0	3	0	3	77.3%	2
South Toms River borough	Ocean	4	0	29	0	29	77.3%	22
Stafford township	Ocean	4	91	20	50	161	77.3%	124
Surf City borough	Ocean	4	0	4	0	4	77.3%	3
Toms River township	Ocean	4	99	84	142	325	77.3%	251
Tuckerton borough	Ocean	4	0	32	0	32	77.3%	25
Bass River township	Burlington	5	5	1	0	6	29.6%	2
Beverly city	Burlington	5	0	6	0	6	29.6%	2
Bordentown city	Burlington	5	40	0	31	71	29.6%	21
Bordentown township	Burlington	5	0	6	16	22	29.6%	7
Burlington city	Burlington	5	0	63	3	66	29.6%	20
Burlington township	Burlington	5	21	56	13	90	29.6%	27
Chesterfield township	Burlington	5	24	0	19	43	29.6%	13
Cinnaminson township	Burlington	5	5	15	0	20	29.6%	6
Delanco township	Burlington	5	0	4	0	4	29.6%	1
Delran township	Burlington	5	10	34	6	50	29.6%	15
Eastampton township	Burlington	5	0	0	0	0	29.6%	0
Edgewater Park township	Burlington	5	46	8	29	83	29.6%	25
Evesham township	Burlington	5	82	16	70	168	29.6%	50
Fieldsboro borough	Burlington	5	0	0	0	0	29.6%	0
Florence township	Burlington	5	81	28	59	168	29.6%	50
Hainesport township	Burlington	5	0	3	0	3	29.6%	1
Lumberton township	Burlington	5	0	10	7	17	29.6%	5
Mansfield township	Burlington	5	0	0	0	0	29.6%	0
Maple Shade township	Burlington	5	0	58	0	58	29.6%	17
Medford township	Burlington	5	12	1	34	47	29.6%	14
Medford Lakes borough	Burlington	5	0	0	0	0	29.6%	0
Moorestown township	Burlington	5	10	12	56	78	29.6%	23
Mount Holly township	Burlington	5	0	62	0	62	29.6%	18
Mount Laurel township	Burlington	5	40	35	46	121	29.6%	36
New Hanover township	Burlington	5	0	0	0	0	29.6%	0
North Hanover township	Burlington	5	0	2	0	2	29.6%	1
Palmyra borough	Burlington	5	0	17	4	21	29.6%	6
Pemberton borough	Burlington	5	0	6	0	6	29.6%	2

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Pemberton township	Burlington	5	11	29	22	62	29.6%	18
Riverside township	Burlington	5	14	37	15	66	29.6%	20
Riverton borough	Burlington	5	0	0	0	0	29.6%	0
Shamong township	Burlington	5	37	0	16	53	29.6%	16
Southampton township	Burlington	5	34	0	21	55	29.6%	16
Springfield township	Burlington	5	5	1	3	9	29.6%	3
Tabernacle township	Burlington	5	0	2	0	2	29.6%	1
Washington township	Burlington	5	2	0	0	2	29.6%	1
Westampton township	Burlington	5	31	1	19	51	29.6%	15
Willingboro township	Burlington	5	72	52	62	186	29.6%	55
Woodland township	Burlington	5	4	3	0	7	29.6%	2
Wrightstown borough	Burlington	5	4	1	2	7	29.6%	2
Audubon borough	Camden	5	33	10	31	74	75.8%	56
Audubon Park borough	Camden	5	0	0	0	0	75.8%	0
Barrington borough	Camden	5	0	12	12	24	75.8%	18
Bellmawr borough	Camden	5	0	49	0	49	75.8%	37
Berlin borough	Camden	5	0	0	63	63	75.8%	48
Berlin township	Camden	5	23	27	0	50	75.8%	38
Brooklawn borough	Camden	5	0	4	0	4	75.8%	3
Camden city	Camden	5	162	692	318	1,172	75.8%	888
Cherry Hill township	Camden	5	12	95	337	444	75.8%	336
Chesilhurst borough	Camden	5	0	10	0	10	75.8%	8
Clementon borough	Camden	5	0	67	10	77	75.8%	58
Collingswood borough	Camden	5	9	17	63	89	75.8%	67
Gibbsboro borough	Camden	5	26	0	8	34	75.8%	26
Gloucester township	Camden	5	56	52	57	165	75.8%	125
Gloucester City	Camden	5	16	94	3	113	75.8%	86
Haddon township	Camden	5	18	18	30	66	75.8%	50
Haddonfield borough	Camden	5	13	7	0	20	75.8%	15
Haddon Heights borough	Camden	5	0	0	32	32	75.8%	24
Hi-Nella borough	Camden	5	0	8	0	8	75.8%	6
Laurel Springs borough	Camden	5	0	5	0	5	75.8%	4
Lawnside borough	Camden	5	0	1	0	1	75.8%	1
Lindenwold borough	Camden	5	55	65	87	207	75.8%	157
Magnolia borough	Camden	5	4	17	0	21	75.8%	16
Merchantville borough	Camden	5	0	1	0	1	75.8%	1
Mount Ephraim borough	Camden	5	0	0	4	4	75.8%	3
Oaklyn borough	Camden	5	8	3	8	19	75.8%	14
Pennsauken township	Camden	5	0	169	87	256	75.8%	194
Pine Hill borough	Camden	5	19	6	0	25	75.8%	19
Pine Valley borough	Camden	5	0	0	0	0	75.8%	0
Runnemede borough	Camden	5	0	41	0	41	75.8%	31
Somerdale borough	Camden	5	0	0	0	0	75.8%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Stratford borough	Camden	5	0	15	11	26	75.8%	20
Tavistock borough	Camden	5	0	0	0	0	75.8%	0
Voorhees township	Camden	5	0	6	322	328	75.8%	249
Waterford township	Camden	5	0	6	0	6	75.8%	5
Winslow township	Camden	5	21	7	60	88	75.8%	67
Woodlynne borough	Camden	5	0	21	14	35	75.8%	27
Clayton borough	Gloucester	5	39	5	21	65	62.9%	41
Deptford township	Gloucester	5	26	23	51	100	62.9%	63
East Greenwich township	Gloucester	5	0	60	0	60	62.9%	38
Elk township	Gloucester	5	0	1	7	8	62.9%	5
Franklin township	Gloucester	5	5	64	0	69	62.9%	43
Glassboro borough	Gloucester	5	0	24	5	29	62.9%	18
Greenwich township	Gloucester	5	0	0	0	0	62.9%	0
Harrison township	Gloucester	5	0	1	0	1	62.9%	1
Logan township	Gloucester	5	0	0	0	0	62.9%	0
Mantua township	Gloucester	5	41	0	22	63	62.9%	40
Monroe township	Gloucester	5	51	10	50	111	62.9%	70
National Park borough	Gloucester	5	6	0	3	9	62.9%	6
Newfield borough	Gloucester	5	0	5	0	5	62.9%	3
Paulsboro borough	Gloucester	5	0	99	10	109	62.9%	69
Pitman borough	Gloucester	5	0	9	38	47	62.9%	30
South Harrison township	Gloucester	5	0	0	0	0	62.9%	0
Swedesboro borough	Gloucester	5	0	26	0	26	62.9%	16
Washington township	Gloucester	5	72	10	113	195	62.9%	123
Wenonah borough	Gloucester	5	0	0	0	0	62.9%	0
West Deptford township	Gloucester	5	5	24	3	32	62.9%	20
Westville borough	Gloucester	5	0	14	0	14	62.9%	9
Woodbury city	Gloucester	5	0	16	25	41	62.9%	26
Woodbury Heights borough	Gloucester	5	6	6	0	12	62.9%	8
Woolwich township	Gloucester	5	0	0	0	0	62.9%	0
Absecon city	Atlantic	6	31	15	12	58	59.2%	34
Atlantic City	Atlantic	6	116	688	42	846	59.2%	501
Brigantine city	Atlantic	6	22	11	7	40	59.2%	24
Buena borough	Atlantic	6	8	6	3	17	59.2%	10
Buena Vista township	Atlantic	6	47	8	15	70	59.2%	41
Corbin City	Atlantic	6	0	0	1	1	59.2%	1
Egg Harbor township	Atlantic	6	88	6	27	121	59.2%	72
Egg Harbor City	Atlantic	6	14	44	4	62	59.2%	37
Estell Manor city	Atlantic	6	0	0	0	0	59.2%	0
Folsom borough	Atlantic	6	0	3	0	3	59.2%	2
Galloway township	Atlantic	6	124	18	44	186	59.2%	110
Hamilton township	Atlantic	6	27	91	11	129	59.2%	76
Hammonton town	Atlantic	6	104	98	41	243	59.2%	144

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Linwood city	Atlantic	6	6	5	9	20	59.2%	12
Longport borough	Atlantic	6	4	0	0	4	59.2%	2
Margate City	Atlantic	6	31	9	10	50	59.2%	30
Mullica township	Atlantic	6	0	3	0	3	59.2%	2
Northfield city	Atlantic	6	0	8	1	9	59.2%	5
Pleasantville city	Atlantic	6	56	196	31	283	59.2%	168
Port Republic city	Atlantic	6	0	0	0	0	59.2%	0
Somers Point city	Atlantic	6	4	19	2	25	59.2%	15
Ventnor City	Atlantic	6	12	33	14	59	59.2%	35
Weymouth township	Atlantic	6	7	0	1	8	59.2%	5
Avalon borough	Cape May	6	0	0	0	0	29.7%	0
Cape May city	Cape May	6	0	12	0	12	29.7%	4
Cape May Point borough	Cape May	6	0	0	0	0	29.7%	0
Dennis township	Cape May	6	35	2	66	103	29.7%	31
Lower township	Cape May	6	13	36	56	105	29.7%	31
Middle township	Cape May	6	0	2	99	101	29.7%	30
North Wildwood city	Cape May	6	0	40	0	40	29.7%	12
Ocean City	Cape May	6	42	38	81	161	29.7%	48
Sea Isle City	Cape May	6	0	0	2	2	29.7%	1
Stone Harbor borough	Cape May	6	0	0	0	0	29.7%	0
Upper township	Cape May	6	0	14	11	25	29.7%	7
West Cape May borough	Cape May	6	3	1	1	5	29.7%	1
West Wildwood borough	Cape May	6	3	0	1	4	29.7%	1
Wildwood city	Cape May	6	0	94	0	94	29.7%	28
Wildwood Crest borough	Cape May	6	26	4	24	54	29.7%	16
Woodbine borough	Cape May	6	0	7	0	7	29.7%	2
Bridgeton city	Cumberland	6	53	344	0	397	79.2%	314
Commercial township	Cumberland	6	0	2	0	2	79.2%	2
Deerfield township	Cumberland	6	0	3	0	3	79.2%	2
Downe township	Cumberland	6	15	0	0	15	79.2%	12
Fairfield township	Cumberland	6	13	15	0	28	79.2%	22
Greenwich township	Cumberland	6	0	0	0	0	79.2%	0
Hopewell township	Cumberland	6	0	0	0	0	79.2%	0
Lawrence township	Cumberland	6	6	0	0	6	79.2%	5
Maurice River township	Cumberland	6	0	8	0	8	79.2%	6
Millville city	Cumberland	6	22	142	0	164	79.2%	130
Shiloh borough	Cumberland	6	0	3	0	3	79.2%	2
Stow Creek township	Cumberland	6	0	1	0	1	79.2%	1
Upper Deerfield township	Cumberland	6	12	21	0	33	79.2%	26
Vineland city	Cumberland	6	9	392	0	401	79.2%	318
Alloway township	Salem	6	0	0	0	0	53.3%	0
Carneys Point township	Salem	6	0	26	11	37	53.3%	20
Elmer borough	Salem	6	0	0	0	0	53.3%	0

Municipality	County	Reg.	Inadequate Plumbing	Pre-1960 & Crowded (w/ adequate plumbing)	Inadequate Kitchen (only)	Unique Deficient Units	Est. LMI Proportion	Unique Deficient LMI Units
Elsinboro township	Salem	6	0	8	1	9	53.3%	5
Lower Alloways Creek twp	Salem	6	0	8	0	8	53.3%	4
Mannington township	Salem	6	0	4	1	5	53.3%	3
Oldmans township	Salem	6	0	0	0	0	53.3%	0
Penns Grove borough	Salem	6	69	41	5	115	53.3%	61
Pennsville township	Salem	6	0	34	8	42	53.3%	22
Pilesgrove township	Salem	6	0	0	14	14	53.3%	7
Pittsgrove township	Salem	6	27	2	7	36	53.3%	19
Quinton township	Salem	6	0	0	0	0	53.3%	0
Salem city	Salem	6	20	25	1	46	53.3%	25
Upper Pittsgrove township	Salem	6	0	13	0	13	53.3%	7
Woodstown borough	Salem	6	0	3	0	3	53.3%	2

TABLE A.2: PRESENT NEED BY MUNICIPALITY

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Allendale borough	Bergen	1	17	1.3	22
Alpine borough	Bergen	1	3	0.2	4
Bergenfield borough	Bergen	1	166	2.8	177
Bogota borough	Bergen	1	80	2.2	89
Carlstadt borough	Bergen	1	32	1.5	38
Cliffside Park borough	Bergen	1	175	(0.5)	173
Closter borough	Bergen	1	0	(1.5)	0
Cresskill borough	Bergen	1	47	2.5	57
Demarest borough	Bergen	1	0	(0.4)	0
Dumont borough	Bergen	1	40	1.5	46
East Rutherford borough	Bergen	1	195	10.1	235
Edgewater borough	Bergen	1	3	(2.7)	0
Elmwood Park borough	Bergen	1	67	(3.9)	51
Emerson borough	Bergen	1	60	5.5	82
Englewood city	Bergen	1	385	15.0	445
Englewood Cliffs borough	Bergen	1	1	(0.4)	0
Fair Lawn borough	Bergen	1	159	10.6	202
Fairview borough	Bergen	1	284	(2.9)	272
Fort Lee borough	Bergen	1	271	11.1	315
Franklin Lakes borough	Bergen	1	31	2.5	41
Garfield city	Bergen	1	189	(5.5)	167
Glen Rock borough	Bergen	1	14	0.6	17
Hackensack city	Bergen	1	566	15.2	627
Harrington Park borough	Bergen	1	5	0.2	6
Hasbrouck Heights borough	Bergen	1	65	2.4	74
Haworth borough	Bergen	1	0	(0.4)	0
Hillsdale borough	Bergen	1	14	0.4	15
Ho-Ho-Kus borough	Bergen	1	8	0.7	11
Leonia borough	Bergen	1	78	1.4	83
Little Ferry borough	Bergen	1	146	7.5	176
Lodi borough	Bergen	1	204	4.0	220
Lyndhurst township	Bergen	1	201	14.7	260
Mahwah township	Bergen	1	69	3.5	83
Maywood borough	Bergen	1	30	0.8	33
Midland Park borough	Bergen	1	32	1.8	39
Montvale borough	Bergen	1	4	(0.5)	2
Moonachie borough	Bergen	1	27	1.9	35
New Milford borough	Bergen	1	49	(0.8)	46
North Arlington borough	Bergen	1	159	10.9	203

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

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Northvale borough	Bergen	1	5	(0.5)	3
Norwood borough	Bergen	1	2	(1.2)	0
Oakland borough	Bergen	1	31	1.6	38
Old Tappan borough	Bergen	1	13	0.3	14
Oradell borough	Bergen	1	12	0.8	15
Palisades Park borough	Bergen	1	166	(0.8)	163
Paramus borough	Bergen	1	147	9.8	186
Park Ridge borough	Bergen	1	111	7.5	141
Ramsey borough	Bergen	1	47	3.1	59
Ridgefield borough	Bergen	1	138	7.4	167
Ridgefield Park village	Bergen	1	161	5.2	182
Ridgewood village	Bergen	1	26	(2.9)	14
River Edge borough	Bergen	1	41	1.3	46
River Vale township	Bergen	1	21	1.9	29
Rochelle Park township	Bergen	1	0	(2.0)	0
Rockleigh borough	Bergen	1	0	(0.2)	0
Rutherford borough	Bergen	1	161	8.5	195
Saddle Brook township	Bergen	1	40	0.7	43
Saddle River borough	Bergen	1	52	3.8	67
South Hackensack township	Bergen	1	57	3.7	72
Teaneck township	Bergen	1	146	(6.3)	121
Tenafly borough	Bergen	1	32	(1.3)	27
Teterboro borough	Bergen	1	0	0.0	0
Upper Saddle River borough	Bergen	1	6	0.5	8
Waldwick borough	Bergen	1	60	4.1	76
Wallington borough	Bergen	1	98	2.6	109
Washington township	Bergen	1	0	0.0	0
Westwood borough	Bergen	1	58	2.5	68
Woodcliff Lake borough	Bergen	1	16	1.5	22
Wood-Ridge borough	Bergen	1	0	(3.6)	0
Wyckoff township	Bergen	1	45	1.9	53
Bayonne city	Hudson	1	751	24.8	850
East Newark borough	Hudson	1	17	(1.5)	11
Guttenberg town	Hudson	1	65	(1.7)	58
Harrison town	Hudson	1	248	2.8	259
Hoboken city	Hudson	1	330	(2.7)	319
Jersey City	Hudson	1	4,581	13.9	4,637
Kearny town	Hudson	1	272	(10.3)	231
North Bergen township	Hudson	1	848	(2.0)	840
Secaucus town	Hudson	1	58	(0.7)	55
Union City	Hudson	1	1,861	(37.7)	1,710
Weehawken township	Hudson	1	205	(1.1)	201
West New York town	Hudson	1	951	(43.4)	778
Bloomingdale borough	Passaic	1	43	2.5	53

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Clifton city	Passaic	1	1,575	82.3	1,904
Haledon borough	Passaic	1	77	0.5	79
Hawthorne borough	Passaic	1	70	3.5	84
Little Falls township	Passaic	1	88	6.5	114
North Haledon borough	Passaic	1	0	0.0	0
Passaic city	Passaic	1	4,460	212.8	5,311
Paterson city	Passaic	1	3,477	39.8	3,636
Pompton Lakes borough	Passaic	1	45	1.4	50
Prospect Park borough	Passaic	1	43	(1.7)	36
Ringwood borough	Passaic	1	14	(1.4)	9
Totowa borough	Passaic	1	93	5.6	116
Wanaque borough	Passaic	1	58	2.7	69
Wayne township	Passaic	1	152	6.9	180
West Milford township	Passaic	1	55	(0.4)	54
Woodland Park borough	Passaic	1	159	12.8	210
Andover borough	Sussex	1	0	0.0	0
Andover township	Sussex	1	5	0.5	7
Branchville borough	Sussex	1	1	0.1	1
Byram township	Sussex	1	26	1.3	31
Frankford township	Sussex	1	27	2.1	35
Franklin borough	Sussex	1	21	0.7	24
Fredon township	Sussex	1	19	1.7	26
Green township	Sussex	1	0	(0.3)	0
Hamburg borough	Sussex	1	11	0.6	14
Hampton township	Sussex	1	6	0.5	8
Hardyston township	Sussex	1	18	1.3	23
Hopatcong borough	Sussex	1	48	3.1	60
Lafayette township	Sussex	1	0	(0.2)	0
Montague township	Sussex	1	0	(0.6)	0
Newton town	Sussex	1	145	11.3	190
Ogdensburg borough	Sussex	1	6	0.2	7
Sandyston township	Sussex	1	5	0.3	6
Sparta township	Sussex	1	28	1.8	35
Stanhope borough	Sussex	1	5	0.3	6
Stillwater township	Sussex	1	0	(0.8)	0
Sussex borough	Sussex	1	10	(1.0)	6
Vernon township	Sussex	1	39	2.3	48
Walpack township	Sussex	1	0	0.0	0
Wantage township	Sussex	1	4	0.4	5
Belleville township	Essex	2	938	55.4	1,159
Bloomfield township	Essex	2	527	16.9	595
Caldwell borough	Essex	2	26	(1.3)	21
Cedar Grove township	Essex	2	16	(0.4)	15
City of Orange township	Essex	2	1,019	39.5	1,177

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
East Orange city	Essex	2	733	(41.1)	569
Essex Fells borough	Essex	2	0	(0.4)	0
Fairfield township	Essex	2	51	4.6	70
Glen Ridge borough	Essex	2	26	0.5	28
Irvington township	Essex	2	989	(2.8)	978
Livingston township	Essex	2	26	(1.3)	21
Maplewood township	Essex	2	119	1.0	123
Millburn township	Essex	2	115	7.2	144
Montclair township	Essex	2	134	(17.6)	63
Newark city	Essex	2	4,143	(47.2)	3,954
North Caldwell borough	Essex	2	27	2.5	37
Nutley township	Essex	2	304	22.1	392
Roseland borough	Essex	2	0	(0.5)	0
S. Orange Village township	Essex	2	5	(3.9)	0
Verona township	Essex	2	13	(3.9)	0
West Caldwell township	Essex	2	41	3.4	54
West Orange township	Essex	2	388	9.6	427
Boonton town	Morris	2	36	0.5	38
Boonton township	Morris	2	18	1.6	25
Butler borough	Morris	2	27	0.7	30
Chatham borough	Morris	2	0	(1.0)	0
Chatham township	Morris	2	46	3.3	59
Chester borough	Morris	2	10	0.4	11
Chester township	Morris	2	20	1.6	27
Denville township	Morris	2	35	1.8	42
Dover town	Morris	2	244	6.7	271
East Hanover township	Morris	2	27	2.5	37
Florham Park borough	Morris	2	64	2.8	75
Hanover township	Morris	2	24	1.3	29
Harding township	Morris	2	0	0.0	0
Jefferson township	Morris	2	50	3.9	66
Kinnelon borough	Morris	2	2	(0.5)	0
Lincoln Park borough	Morris	2	11	(0.6)	8
Long Hill township	Morris	2	10	0.9	14
Madison borough	Morris	2	16	(2.7)	5
Mendham borough	Morris	2	8	0.5	10
Mendham township	Morris	2	16	1.5	22
Mine Hill township	Morris	2	3	(1.3)	0
Montville township	Morris	2	13	0.6	16
Morris township	Morris	2	25	0.5	27
Morris Plains borough	Morris	2	26	2.2	35
Morristown town	Morris	2	134	(1.5)	128
Mountain Lakes borough	Morris	2	1	0.1	1
Mount Arlington borough	Morris	2	13	0.5	15

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Mount Olive township	Morris	2	113	7.0	141
Netcong borough	Morris	2	16	1.0	20
Parsippany-Troy Hills twp	Morris	2	173	0.0	173
Pequannock township	Morris	2	56	5.1	76
Randolph township	Morris	2	27	0.8	30
Riverdale borough	Morris	2	2	0.0	2
Rockaway borough	Morris	2	13	0.5	15
Rockaway township	Morris	2	23	0.2	24
Roxbury township	Morris	2	24	0.5	26
Victory Gardens borough	Morris	2	12	0.0	12
Washington township	Morris	2	7	0.5	9
Wharton borough	Morris	2	75	5.5	97
Berkeley Heights township	Union	2	14	(1.0)	10
Clark township	Union	2	30	2.0	38
Cranford township	Union	2	84	3.2	97
Elizabeth city	Union	2	5,045	215.3	5,906
Fanwood borough	Union	2	16	(0.1)	16
Garwood borough	Union	2	33	2.1	41
Hillside township	Union	2	255	8.2	288
Kenilworth borough	Union	2	2	(2.3)	0
Linden city	Union	2	408	17.5	478
Mountainside borough	Union	2	106	7.9	138
New Providence borough	Union	2	53	3.1	65
Plainfield city	Union	2	969	5.4	990
Rahway city	Union	2	148	(8.3)	115
Roselle borough	Union	2	245	6.1	269
Roselle Park borough	Union	2	92	(2.0)	84
Scotch Plains township	Union	2	79	5.5	101
Springfield township	Union	2	2	(1.3)	0
Summit city	Union	2	145	6.7	172
Union township	Union	2	358	16.0	422
Westfield town	Union	2	64	3.0	76
Winfield township	Union	2	21	0.4	22
Allamuchy township	Warren	2	47	4.0	63
Alpha borough	Warren	2	10	0.8	13
Belvidere town	Warren	2	10	0.3	11
Blairstown township	Warren	2	0	(1.3)	0
Franklin township	Warren	2	0	(0.6)	0
Frelinghuysen township	Warren	2	0	(0.4)	0
Greenwich township	Warren	2	0	(1.5)	0
Hackettstown town	Warren	2	115	5.0	135
Hardwick township	Warren	2	2	0.0	2
Harmony township	Warren	2	1	(0.2)	0
Hope township	Warren	2	4	(0.3)	3

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Independence township	Warren	2	0	(1.5)	0
Knowlton township	Warren	2	16	0.3	17
Liberty township	Warren	2	0	(0.7)	0
Lopatcong township	Warren	2	0	(1.0)	0
Mansfield township	Warren	2	16	1.5	22
Oxford township	Warren	2	21	1.4	26
Phillipsburg town	Warren	2	176	9.2	213
Pohatcong township	Warren	2	6	0.5	8
Washington borough	Warren	2	19	(1.5)	13
Washington township	Warren	2	5	0.5	7
White township	Warren	2	62	5.6	85
Alexandria township	Hunterdon	3	29	2.1	37
Bethlehem township	Hunterdon	3	4	0.1	4
Bloomsbury borough	Hunterdon	3	2	0.2	3
Califon borough	Hunterdon	3	0	(0.1)	0
Clinton town	Hunterdon	3	17	1.5	23
Clinton township	Hunterdon	3	17	0.7	20
Delaware township	Hunterdon	3	21	1.5	27
East Amwell township	Hunterdon	3	3	(0.2)	2
Flemington borough	Hunterdon	3	72	5.7	95
Franklin township	Hunterdon	3	0	(0.9)	0
Frenchtown borough	Hunterdon	3	1	(0.3)	0
Glen Gardner borough	Hunterdon	3	7	0.4	8
Hampton borough	Hunterdon	3	14	1.2	19
High Bridge borough	Hunterdon	3	42	3.8	57
Holland township	Hunterdon	3	80	6.1	104
Kingwood township	Hunterdon	3	5	(0.1)	5
Lambertville city	Hunterdon	3	64	3.7	79
Lebanon borough	Hunterdon	3	4	0.3	5
Lebanon township	Hunterdon	3	3	(0.7)	0
Milford borough	Hunterdon	3	1	(0.2)	0
Raritan township	Hunterdon	3	23	1.3	28
Readington township	Hunterdon	3	100	9.1	136
Stockton borough	Hunterdon	3	0	(0.2)	0
Tewksbury township	Hunterdon	3	0	0.0	0
Union township	Hunterdon	3	1	(0.1)	1
West Amwell township	Hunterdon	3	0	(0.2)	0
Carteret borough	Middlesex	3	129	(6.5)	103
Cranbury township	Middlesex	3	4	(0.2)	3
Dunellen borough	Middlesex	3	8	(2.2)	0
East Brunswick township	Middlesex	3	83	3.7	98
Edison township	Middlesex	3	520	32.9	652
Helmetta borough	Middlesex	3	5	0.3	6
Highland Park borough	Middlesex	3	76	0.4	77

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Jamesburg borough	Middlesex	3	30	1.2	35
Metuchen borough	Middlesex	3	69	2.7	80
Middlesex borough	Middlesex	3	58	3.0	70
Milltown borough	Middlesex	3	29	1.7	36
Monroe township	Middlesex	3	112	3.5	126
New Brunswick city	Middlesex	3	1,285	42.4	1,454
North Brunswick township	Middlesex	3	175	10.3	216
Old Bridge township	Middlesex	3	183	5.3	204
Perth Amboy city	Middlesex	3	776	(21.3)	691
Piscataway township	Middlesex	3	262	11.8	309
Plainsboro township	Middlesex	3	12	(1.8)	5
Sayreville borough	Middlesex	3	131	3.5	145
South Amboy city	Middlesex	3	33	0.8	36
South Brunswick township	Middlesex	3	118	7.5	148
South Plainfield borough	Middlesex	3	64	(3.2)	51
South River borough	Middlesex	3	146	5.5	168
Spotswood borough	Middlesex	3	13	(0.5)	11
Woodbridge township	Middlesex	3	365	7.2	394
Bedminster township	Somerset	3	1	0.1	1
Bernards township	Somerset	3	40	2.6	51
Bernardsville borough	Somerset	3	3	(1.0)	0
Bound Brook borough	Somerset	3	101	(6.3)	76
Branchburg township	Somerset	3	10	(1.1)	6
Bridgewater township	Somerset	3	153	7.5	183
Far Hills borough	Somerset	3	2	0.0	2
Franklin township	Somerset	3	108	(3.3)	95
Green Brook township	Somerset	3	9	0.8	12
Hillsborough township	Somerset	3	68	4.9	88
Manville borough	Somerset	3	172	9.1	208
Millstone borough	Somerset	3	0	(0.2)	0
Montgomery township	Somerset	3	73	5.9	97
North Plainfield borough	Somerset	3	347	6.3	372
Peapack & Gladstone bor.	Somerset	3	1	(0.4)	0
Raritan borough	Somerset	3	49	(2.4)	40
Rocky Hill borough	Somerset	3	2	(0.1)	2
Somerville borough	Somerset	3	116	4.4	133
South Bound Brook borough	Somerset	3	87	1.5	93
Warren township	Somerset	3	66	5.1	86
Watchung borough	Somerset	3	24	1.2	29
East Windsor township	Mercer	4	58	(0.2)	57
Ewing township	Mercer	4	92	2.3	101
Hamilton township	Mercer	4	378	12.6	429
Hightstown borough	Mercer	4	36	(0.4)	35
Hopewell borough	Mercer	4	11	1.0	15

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Hopewell township	Mercer	4	0	(0.2)	0
Lawrence township	Mercer	4	45	0.6	48
Pennington borough	Mercer	4	50	4.5	68
Princeton	Mercer	4	81	1.4	86
Robbinsville township	Mercer	4	18	0.5	20
Trenton city	Mercer	4	872	(19.1)	796
West Windsor township	Mercer	4	98	7.2	127
Aberdeen township	Monmouth	4	81	5.0	101
Allenhurst borough	Monmouth	4	3	0.2	4
Allentown borough	Monmouth	4	9	0.3	10
Asbury Park city	Monmouth	4	301	(3.1)	289
Atlantic Highlands borough	Monmouth	4	63	5.2	84
Avon-by-the-Sea borough	Monmouth	4	3	(0.7)	0
Belmar borough	Monmouth	4	59	0.8	62
Bradley Beach borough	Monmouth	4	23	(0.5)	21
Brielle borough	Monmouth	4	9	0.8	12
Colts Neck township	Monmouth	4	13	1.2	18
Deal borough	Monmouth	4	2	0.1	2
Eatontown borough	Monmouth	4	107	7.0	135
Englishtown borough	Monmouth	4	36	0.4	37
Fair Haven borough	Monmouth	4	0	(0.3)	0
Farmingdale borough	Monmouth	4	3	(0.2)	2
Freehold borough	Monmouth	4	258	11.3	303
Freehold township	Monmouth	4	87	5.7	110
Hazlet township	Monmouth	4	27	0.3	28
Highlands borough	Monmouth	4	51	2.8	62
Holmdel township	Monmouth	4	40	2.3	49
Howell township	Monmouth	4	80	1.3	85
Interlaken borough	Monmouth	4	3	0.3	4
Keansburg borough	Monmouth	4	124	5.2	145
Keyport borough	Monmouth	4	19	(0.2)	18
Lake Como borough	Monmouth	4	7	(1.1)	3
Little Silver borough	Monmouth	4	7	0.6	10
Loch Arbour village	Monmouth	4	0	0.0	0
Long Branch city	Monmouth	4	336	3.7	351
Manalapan township	Monmouth	4	99	6.0	123
Manasquan borough	Monmouth	4	10	(1.6)	3
Marlboro township	Monmouth	4	106	6.9	134
Matawan borough	Monmouth	4	62	4.4	79
Middletown township	Monmouth	4	191	5.4	212
Millstone township	Monmouth	4	30	1.5	36
Monmouth Beach borough	Monmouth	4	0	(0.5)	0
Neptune township	Monmouth	4	121	(3.0)	109
Neptune City borough	Monmouth	4	12	0.3	13

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Ocean township	Monmouth	4	80	2.9	92
Oceanport borough	Monmouth	4	0	0.0	0
Red Bank borough	Monmouth	4	122	4.0	138
Roosevelt borough	Monmouth	4	5	0.2	6
Rumson borough	Monmouth	4	24	2.2	33
Sea Bright borough	Monmouth	4	16	(0.6)	13
Sea Girt borough	Monmouth	4	0	(0.3)	0
Shrewsbury borough	Monmouth	4	7	0.6	10
Shrewsbury township	Monmouth	4	24	2.1	32
Spring Lake borough	Monmouth	4	30	(1.5)	24
Spring Lake Heights bor.	Monmouth	4	20	1.4	25
Tinton Falls borough	Monmouth	4	98	5.5	120
Union Beach borough	Monmouth	4	52	2.9	64
Upper Freehold township	Monmouth	4	40	3.0	52
Wall township	Monmouth	4	114	6.5	140
West Long Branch borough	Monmouth	4	10	0.9	14
Barnegat township	Ocean	4	46	4.2	63
Barnegat Light borough	Ocean	4	11	0.6	14
Bay Head borough	Ocean	4	2	(0.3)	1
Beach Haven borough	Ocean	4	2	0.2	3
Beachwood borough	Ocean	4	8	(1.1)	4
Berkeley township	Ocean	4	87	2.5	97
Brick township	Ocean	4	267	16.4	332
Eagleswood township	Ocean	4	0	(0.2)	0
Harvey Cedars borough	Ocean	4	2	0.2	3
Island Heights borough	Ocean	4	2	0.2	3
Jackson township	Ocean	4	57	0.8	60
Lacey township	Ocean	4	65	3.7	80
Lakehurst borough	Ocean	4	15	1.2	20
Lakewood township	Ocean	4	535	3.5	549
Lavallette borough	Ocean	4	0	0.0	0
Little Egg Harbor township	Ocean	4	138	12.5	188
Long Beach township	Ocean	4	12	1.1	16
Manchester township	Ocean	4	126	8.5	160
Mantoloking borough	Ocean	4	0	(0.1)	0
Ocean township	Ocean	4	8	(0.1)	8
Ocean Gate borough	Ocean	4	10	0.4	11
Pine Beach borough	Ocean	4	3	0.3	4
Plumsted township	Ocean	4	13	0.4	14
Point Pleasant borough	Ocean	4	12	(0.4)	11
Point Pleasant Beach bor.	Ocean	4	41	(1.3)	36
Seaside Heights borough	Ocean	4	118	8.9	154
Seaside Park borough	Ocean	4	26	1.5	32
Ship Bottom borough	Ocean	4	2	(0.5)	0

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
South Toms River borough	Ocean	4	22	1.7	29
Stafford township	Ocean	4	124	9.4	161
Surf City borough	Ocean	4	3	0.1	3
Toms River township	Ocean	4	251	14.4	308
Tuckerton borough	Ocean	4	25	1.8	32
Bass River township	Burlington	5	2	(1.0)	0
Beverly city	Burlington	5	2	(1.4)	0
Bordentown city	Burlington	5	21	1.5	27
Bordentown township	Burlington	5	7	(1.3)	2
Burlington city	Burlington	5	20	(3.9)	4
Burlington township	Burlington	5	27	(3.1)	15
Chesterfield township	Burlington	5	13	1.2	18
Cinnaminson township	Burlington	5	6	0.1	6
Delanco township	Burlington	5	1	(0.5)	0
Delran township	Burlington	5	15	(0.8)	12
Eastampton township	Burlington	5	0	(1.5)	0
Edgewater Park township	Burlington	5	25	1.2	30
Evesham township	Burlington	5	50	4.1	66
Fieldsboro borough	Burlington	5	0	(0.3)	0
Florence township	Burlington	5	50	1.4	55
Hainesport township	Burlington	5	1	(0.7)	0
Lumberton township	Burlington	5	5	(3.6)	0
Mansfield township	Burlington	5	0	(0.5)	0
Maple Shade township	Burlington	5	17	(2.4)	8
Medford township	Burlington	5	14	0.1	14
Medford Lakes borough	Burlington	5	0	0.0	0
Moorestown township	Burlington	5	23	0.5	25
Mount Holly township	Burlington	5	18	(4.1)	2
Mount Laurel township	Burlington	5	36	0.7	39
New Hanover township	Burlington	5	0	(0.8)	0
North Hanover township	Burlington	5	1	(1.4)	0
Palmyra borough	Burlington	5	6	(1.1)	2
Pemberton borough	Burlington	5	2	(1.0)	0
Pemberton township	Burlington	5	18	(5.5)	0
Riverside township	Burlington	5	20	(1.8)	13
Riverton borough	Burlington	5	0	(1.5)	0
Shamong township	Burlington	5	16	0.8	19
Southampton township	Burlington	5	16	1.0	20
Springfield township	Burlington	5	3	0.0	3
Tabernacle township	Burlington	5	1	(0.7)	0
Washington township	Burlington	5	1	0.1	1
Westampton township	Burlington	5	15	0.2	16
Willingboro township	Burlington	5	55	0.9	59
Woodland township	Burlington	5	2	(0.4)	1

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Wrightstown borough	Burlington	5	2	(0.2)	1
Audubon borough	Camden	5	56	3.6	71
Audubon Park borough	Camden	5	0	(0.5)	0
Barrington borough	Camden	5	18	1.5	24
Bellmawr borough	Camden	5	37	(0.5)	35
Berlin borough	Camden	5	48	2.3	57
Berlin township	Camden	5	38	3.1	50
Brooklawn borough	Camden	5	3	(0.5)	1
Camden city	Camden	5	888	(72.9)	596
Cherry Hill township	Camden	5	336	16.5	402
Chesilhurst borough	Camden	5	8	0.6	11
Clementon borough	Camden	5	58	2.4	67
Collingswood borough	Camden	5	67	(0.6)	64
Gibbsboro borough	Camden	5	26	0.7	29
Gloucester township	Camden	5	125	3.2	138
Gloucester City	Camden	5	86	2.5	96
Haddon township	Camden	5	50	1.3	55
Haddonfield borough	Camden	5	15	(0.9)	11
Haddon Heights borough	Camden	5	24	0.1	24
Hi-Nella borough	Camden	5	6	0.2	7
Laurel Springs borough	Camden	5	4	(0.1)	4
Lawnside borough	Camden	5	1	(1.3)	0
Lindenwold borough	Camden	5	157	8.3	190
Magnolia borough	Camden	5	16	0.7	19
Merchantville borough	Camden	5	1	(1.3)	0
Mount Ephraim borough	Camden	5	3	(0.3)	2
Oaklyn borough	Camden	5	14	0.0	14
Pennsauken township	Camden	5	194	1.0	198
Pine Hill borough	Camden	5	19	(1.3)	14
Pine Valley borough	Camden	5	0	0.0	0
Runnemede borough	Camden	5	31	1.2	36
Somerdale borough	Camden	5	0	(1.3)	0
Stratford borough	Camden	5	20	(0.3)	19
Tavistock borough	Camden	5	0	0.0	0
Voorhees township	Camden	5	249	14.3	306
Waterford township	Camden	5	5	(2.8)	0
Winslow township	Camden	5	67	(0.4)	66
Woodlynne borough	Camden	5	27	(0.3)	26
Clayton borough	Gloucester	5	41	(0.6)	38
Deptford township	Gloucester	5	63	4.0	79
East Greenwich township	Gloucester	5	38	2.5	48
Elk township	Gloucester	5	5	(0.2)	4
Franklin township	Gloucester	5	43	0.5	45
Glassboro borough	Gloucester	5	18	(2.0)	10

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Greenwich township	Gloucester	5	0	(1.3)	0
Harrison township	Gloucester	5	1	(0.8)	0
Logan township	Gloucester	5	0	0.0	0
Mantua township	Gloucester	5	40	2.9	52
Monroe township	Gloucester	5	70	2.6	81
National Park borough	Gloucester	5	6	0.0	6
Newfield borough	Gloucester	5	3	0.1	3
Paulsboro borough	Gloucester	5	69	3.6	84
Pitman borough	Gloucester	5	30	0.8	33
South Harrison township	Gloucester	5	0	(0.5)	0
Swedesboro borough	Gloucester	5	16	0.8	19
Washington township	Gloucester	5	123	8.6	158
Wenonah borough	Gloucester	5	0	0.0	0
West Deptford township	Gloucester	5	20	(2.0)	12
Westville borough	Gloucester	5	9	(2.5)	0
Woodbury city	Gloucester	5	26	(3.2)	13
Woodbury Heights borough	Gloucester	5	8	0.0	8
Woolwich township	Gloucester	5	0	(0.3)	0
Absecon city	Atlantic	6	34	1.1	38
Atlantic City	Atlantic	6	501	(6.7)	474
Brigantine city	Atlantic	6	24	1.5	30
Buena borough	Atlantic	6	10	(1.5)	4
Buena Vista township	Atlantic	6	41	2.7	52
Corbin City	Atlantic	6	1	0.0	1
Egg Harbor township	Atlantic	6	72	0.7	75
Egg Harbor City	Atlantic	6	37	0.6	40
Estell Manor city	Atlantic	6	0	(0.5)	0
Folsom borough	Atlantic	6	2	(0.2)	1
Galloway township	Atlantic	6	110	7.1	138
Hamilton township	Atlantic	6	76	3.5	90
Hammonton town	Atlantic	6	144	7.1	172
Linwood city	Atlantic	6	12	(2.6)	1
Longport borough	Atlantic	6	2	0.0	2
Margate City	Atlantic	6	30	2.5	40
Mullica township	Atlantic	6	2	(1.7)	0
Northfield city	Atlantic	6	5	(0.5)	3
Pleasantville city	Atlantic	6	168	8.5	202
Port Republic city	Atlantic	6	0	0.0	0
Somers Point city	Atlantic	6	15	(0.4)	14
Ventnor City	Atlantic	6	35	(5.6)	12
Weymouth township	Atlantic	6	5	(0.1)	5
Avalon borough	Cape May	6	0	0.0	0
Cape May city	Cape May	6	4	(0.2)	3
Cape May Point borough	Cape May	6	0	0.0	0

Municipality	County	Reg.	Unique Deficient LMI Units 2009-13	Annualized Net Change[104]	Present Need 2015
Dennis township	Cape May	6	31	1.9	39
Lower township	Cape May	6	31	(1.7)	24
Middle township	Cape May	6	30	0.7	33
North Wildwood city	Cape May	6	12	(0.1)	12
Ocean City	Cape May	6	48	(3.9)	32
Sea Isle City	Cape May	6	1	(0.2)	0
Stone Harbor borough	Cape May	6	0	0.0	0
Upper township	Cape May	6	7	(0.4)	6
West Cape May borough	Cape May	6	1	(0.6)	0
West Wildwood borough	Cape May	6	1	0.1	1
Wildwood city	Cape May	6	28	(4.7)	9
Wildwood Crest borough	Cape May	6	16	1.3	21
Woodbine borough	Cape May	6	2	(1.0)	0
Bridgeton city	Cumberland	6	314	7.0	342
Commercial township	Cumberland	6	2	(0.1)	2
Deerfield township	Cumberland	6	2	(1.6)	0
Downe township	Cumberland	6	12	0.1	12
Fairfield township	Cumberland	6	22	1.7	29
Greenwich township	Cumberland	6	0	0.0	0
Hopewell township	Cumberland	6	0	0.0	0
Lawrence township	Cumberland	6	5	(0.1)	5
Maurice River township	Cumberland	6	6	0.1	6
Millville city	Cumberland	6	130	1.9	138
Shiloh borough	Cumberland	6	2	0.2	3
Stow Creek township	Cumberland	6	1	(0.4)	0
Upper Deerfield township	Cumberland	6	26	0.8	29
Vineland city	Cumberland	6	318	(6.1)	294
Alloway township	Salem	6	0	(0.5)	0
Carneys Point township	Salem	6	20	0.5	22
Elmer borough	Salem	6	0	(0.5)	0
Elsinboro township	Salem	6	5	0.5	7
Lower Alloways Creek twp	Salem	6	4	(0.3)	3
Mannington township	Salem	6	3	(0.4)	2
Oldmans township	Salem	6	0	(0.5)	0
Penns Grove borough	Salem	6	61	1.3	66
Pennsville township	Salem	6	22	0.9	26
Pilesgrove township	Salem	6	7	0.3	8
Pittsgrove township	Salem	6	19	0.3	20
Quinton township	Salem	6	0	(0.6)	0
Salem city	Salem	6	25	(2.0)	17
Upper Pittsgrove township	Salem	6	7	0.4	8
Woodstown borough	Salem	6	2	(0.8)	0

APPENDIX B: MUNICIPAL ALLOCATION OF REGIONAL PROSPECTIVE NEED

TABLE B.1: QUALIFICATION OF URBAN AID MUNICIPALITIES

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

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

TABLE B.2: MUNICIPAL ALLOCATION OF REGIONAL PROSPECTIVE NEED

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Allendale borough	Bergen	12,544	0.65%	0.00%	1.27%	0.67%	0.64%	81
Alpine borough	Bergen	12,544	0.08%	0.58%	1.20%	1.24%	0.77%	97
Bergenfield borough	Bergen	12,544	0.69%	0.62%	1.05%	0.15%	0.63%	79
Bogota borough	Bergen	12,544	0.19%	0.00%	0.52%	0.09%	0.20%	25
Carlstadt borough	Bergen	12,544	2.36%	0.00%	0.35%	0.06%	0.69%	87
Cliffside Park borough	Bergen	12,544	0.45%	0.00%	0.74%	0.13%	0.33%	41
Closter borough	Bergen	12,544	0.53%	0.00%	1.20%	0.59%	0.58%	73
Cresskill borough	Bergen	12,544	0.66%	4.87%	1.08%	0.37%	1.75%	219
Demarest borough	Bergen	12,544	0.13%	0.01%	1.31%	0.37%	0.46%	57
Dumont borough	Bergen	12,544	0.38%	1.33%	0.96%	0.07%	0.69%	86
East Rutherford borough	Bergen	12,544	1.52%	0.00%	0.46%	0.56%	0.63%	80
Edgewater borough	Bergen	12,544	0.83%	4.23%	1.35%	0.78%	1.80%	225
Elmwood Park borough	Bergen	12,544	1.53%	2.21%	0.52%	0.39%	1.16%	146
Emerson borough	Bergen	12,544	0.40%	0.00%	0.82%	1.34%	0.64%	80
Englewood city	Bergen	12,544	2.72%	0.00%	1.37%	1.11%	1.30%	163
Englewood Cliffs borough	Bergen	12,544	1.60%	2.12%	1.13%	0.84%	1.43%	179
Fair Lawn borough	Bergen	12,544	2.30%	3.08%	1.78%	0.74%	1.98%	248
Fairview borough	Bergen	12,544	0.42%	0.00%	0.15%	0.20%	0.19%	24
Fort Lee borough	Bergen	12,544	2.26%	0.00%	1.57%	0.31%	1.04%	130
Franklin Lakes borough	Bergen	12,544	1.38%	0.00%	2.24%	3.89%	1.88%	236
Garfield city	Bergen	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Glen Rock borough	Bergen	12,544	0.60%	0.00%	2.12%	0.32%	0.76%	95
Hackensack city	Bergen	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Harrington Park borough	Bergen	12,544	0.21%	0.58%	1.17%	0.96%	0.73%	92
Hasbrouck Heights borough	Bergen	12,544	1.19%	6.45%	0.84%	0.20%	2.17%	272
Haworth borough	Bergen	12,544	0.13%	0.00%	1.09%	0.37%	0.40%	50
Hillsdale borough	Bergen	12,544	0.38%	0.00%	1.15%	1.25%	0.69%	87
Ho-Ho-Kus borough	Bergen	12,544	0.18%	0.00%	1.56%	0.54%	0.57%	72
Leonia borough	Bergen	12,544	0.43%	0.92%	0.71%	0.09%	0.54%	67
Little Ferry borough	Bergen	12,544	0.59%	0.00%	0.47%	0.36%	0.36%	45
Lodi borough	Bergen	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lyndhurst township	Bergen	12,544	1.97%	0.00%	0.74%	1.01%	0.93%	117
Mahwah township	Bergen	12,544	2.92%	0.00%	1.92%	4.74%	2.40%	301
Maywood borough	Bergen	12,544	0.56%	0.00%	0.68%	0.35%	0.40%	50
Midland Park borough	Bergen	12,544	0.60%	0.00%	0.65%	0.20%	0.36%	45
Montvale borough	Bergen	12,544	1.93%	2.40%	1.03%	2.08%	1.86%	233
Moonachie borough	Bergen	12,544	1.46%	0.00%	0.12%	0.11%	0.42%	53
New Milford borough	Bergen	12,544	0.39%	1.02%	0.77%	0.10%	0.57%	71

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
North Arlington borough	Bergen	12,544	0.64%	0.33%	0.68%	0.38%	0.51%	64
Northvale borough	Bergen	12,544	0.64%	0.00%	0.51%	0.21%	0.34%	43
Norwood borough	Bergen	12,544	0.33%	0.00%	0.73%	0.51%	0.39%	49
Oakland borough	Bergen	12,544	0.95%	0.00%	1.28%	3.15%	1.35%	169
Old Tappan borough	Bergen	12,544	0.39%	3.22%	1.13%	0.88%	1.40%	176
Oradell borough	Bergen	12,544	0.57%	0.00%	1.60%	0.07%	0.56%	70
Palisades Park borough	Bergen	12,544	0.58%	0.00%	0.47%	0.19%	0.31%	39
Paramus borough	Bergen	12,544	7.72%	0.00%	1.68%	2.42%	2.95%	371
Park Ridge borough	Bergen	12,544	0.64%	0.50%	1.02%	0.36%	0.63%	79
Ramsey borough	Bergen	12,544	1.87%	0.00%	1.81%	1.14%	1.21%	151
Ridgefield borough	Bergen	12,544	0.84%	0.00%	0.44%	0.69%	0.49%	62
Ridgefield Park village	Bergen	12,544	0.74%	0.00%	0.43%	0.30%	0.37%	46
Ridgewood village	Bergen	12,544	2.14%	1.12%	3.30%	1.04%	1.90%	238
River Edge borough	Bergen	12,544	0.66%	1.90%	0.99%	0.10%	0.91%	114
River Vale township	Bergen	12,544	0.27%	0.00%	1.43%	0.73%	0.61%	76
Rochelle Park township	Bergen	12,544	0.83%	0.00%	0.41%	0.09%	0.33%	42
Rockleigh borough	Bergen	12,544	0.34%	2.97%	1.31%	0.19%	1.20%	150
Rutherford borough	Bergen	12,544	1.29%	3.21%	1.07%	0.10%	1.42%	178
Saddle Brook township	Bergen	12,544	1.69%	0.00%	0.69%	0.53%	0.73%	91
Saddle River borough	Bergen	12,544	0.17%	1.46%	1.04%	3.19%	1.47%	184
South Hackensack township	Bergen	12,544	0.93%	0.00%	0.28%	0.13%	0.33%	42
Teaneck township	Bergen	12,544	3.15%	14.83%	2.04%	0.34%	5.09%	638
Tenafly borough	Bergen	12,544	0.70%	0.00%	2.24%	0.55%	0.87%	109
Teterboro borough	Bergen	12,544	1.28%	0.95%	0.37%	0.01%	0.65%	82
Upper Saddle River borough	Bergen	12,544	0.85%	2.66%	2.19%	0.75%	1.61%	202
Waldwick borough	Bergen	12,544	0.51%	0.10%	1.03%	0.46%	0.52%	66
Wallington borough	Bergen	12,544	0.41%	0.00%	0.20%	0.18%	0.20%	25
Washington township	Bergen	12,544	0.28%	3.24%	1.22%	0.69%	1.36%	170
Westwood borough	Bergen	12,544	0.70%	0.00%	0.73%	0.45%	0.47%	59
Woodcliff Lake borough	Bergen	12,544	0.92%	2.35%	1.25%	1.54%	1.52%	190
Wood-Ridge borough	Bergen	12,544	0.39%	0.00%	0.75%	0.05%	0.30%	37
Wyckoff township	Bergen	12,544	0.95%	0.00%	2.42%	1.94%	1.33%	166
Bayonne city	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Newark borough	Hudson	12,544	0.04%	0.00%	0.10%	0.07%	0.05%	6
Guttenberg town	Hudson	12,544	0.18%	0.00%	0.29%	0.14%	0.15%	19
Harrison town	Hudson	12,544	0.83%	3.09%	0.20%	0.15%	1.07%	134
Hoboken city	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Jersey City	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kearny town	Hudson	12,544	2.36%	0.00%	0.69%	2.78%	1.46%	183
North Bergen township	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Secaucus town	Hudson	12,544	6.62%	0.00%	1.00%	0.06%	1.92%	241
Union City	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Weehawken township	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
West New York town	Hudson	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Bloomingdale borough	Passaic	12,544	0.21%	0.00%	0.43%	1.78%	0.61%	76
Clifton city	Passaic	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haledon borough	Passaic	12,544	0.24%	0.00%	0.26%	0.46%	0.24%	30
Hawthorne borough	Passaic	12,544	1.09%	0.00%	0.89%	0.98%	0.74%	93
Little Falls township	Passaic	12,544	1.14%	0.00%	0.59%	1.69%	0.86%	107
North Haledon borough	Passaic	12,544	0.28%	0.30%	0.86%	1.92%	0.84%	105
Passaic city	Passaic	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Paterson city	Passaic	12,544	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pompton Lakes borough	Passaic	12,544	0.36%	0.00%	0.76%	0.90%	0.50%	63
Prospect Park borough	Passaic	12,544	0.10%	0.45%	0.18%	0.55%	0.32%	40
Ringwood borough	Passaic	12,544	0.37%	0.00%	0.99%	0.00%	0.34%	43
Totowa borough	Passaic	12,544	2.28%	0.00%	0.61%	2.13%	1.26%	158
Wanaque borough	Passaic	12,544	0.38%	0.98%	0.73%	2.46%	1.14%	143
Wayne township	Passaic	12,544	6.65%	0.00%	3.07%	13.27%	5.75%	721
West Milford township	Passaic	12,544	0.70%	0.00%	1.39%	0.00%	0.52%	66
Woodland Park borough	Passaic	12,544	0.82%	0.58%	0.62%	1.70%	0.93%	117
Andover borough	Sussex	12,544	0.03%	0.03%	0.37%	0.00%	0.11%	13
Andover township	Sussex	12,544	0.57%	6.02%	0.84%	0.00%	1.86%	233
Branchville borough	Sussex	12,544	0.27%	4.30%	0.23%	0.00%	1.20%	150
Byram township	Sussex	12,544	0.23%	1.57%	0.89%	0.00%	0.67%	84
Frankford township	Sussex	12,544	0.26%	0.00%	0.71%	0.00%	0.24%	31
Franklin borough	Sussex	12,544	0.19%	0.13%	0.23%	0.00%	0.14%	17
Fredon township	Sussex	12,544	0.13%	1.83%	0.73%	0.00%	0.67%	85
Green township	Sussex	12,544	0.06%	0.00%	0.83%	0.41%	0.33%	41
Hamburg borough	Sussex	12,544	0.13%	0.00%	0.26%	0.00%	0.10%	12
Hampton township	Sussex	12,544	0.37%	0.00%	0.49%	0.00%	0.22%	27
Hardyston township	Sussex	12,544	0.46%	3.61%	0.68%	8.34%	3.27%	410
Hopatcong borough	Sussex	12,544	0.22%	0.85%	0.91%	0.97%	0.74%	93
Lafayette township	Sussex	12,544	0.22%	1.46%	0.59%	0.00%	0.57%	71
Montague township	Sussex	12,544	0.12%	1.37%	0.23%	0.00%	0.43%	54
Newton town	Sussex	12,544	0.63%	0.00%	0.12%	0.00%	0.19%	23
Ogdensburg borough	Sussex	12,544	0.03%	0.00%	0.37%	0.04%	0.11%	14
Sandyston township	Sussex	12,544	0.08%	0.64%	0.35%	0.00%	0.27%	34
Sparta township	Sussex	12,544	1.02%	0.00%	1.95%	4.56%	1.88%	236
Stanhope borough	Sussex	12,544	0.23%	0.00%	0.50%	0.44%	0.29%	37
Stillwater township	Sussex	12,544	0.11%	0.81%	0.47%	0.00%	0.35%	44

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Sussex borough	Sussex	12,544	0.08%	0.00%	0.00%	0.00%	0.02%	2
Vernon township	Sussex	12,544	0.62%	2.70%	1.00%	4.21%	2.13%	267
Walpack township	Sussex	12,544	0.00%	0.01%	0.00%	0.00%	0.00%	0
Wantage township	Sussex	12,544	0.33%	0.00%	0.78%	0.00%	0.28%	35
Belleville township	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Bloomfield township	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Caldwell borough	Essex	8,531	0.39%	0.00%	0.48%	0.02%	0.22%	19
Cedar Grove township	Essex	8,531	0.89%	0.00%	0.99%	0.88%	0.69%	59
City of Orange township	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
East Orange city	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Essex Fells borough	Essex	8,531	0.04%	0.05%	1.51%	0.11%	0.43%	37
Fairfield township	Essex	8,531	3.75%	0.00%	0.82%	0.87%	1.36%	116
Glen Ridge borough	Essex	8,531	0.20%	0.07%	1.89%	0.01%	0.54%	46
Irvington township	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Livingston township	Essex	8,531	4.02%	0.00%	2.83%	1.48%	2.08%	178
Maplewood township	Essex	8,531	1.08%	0.35%	1.93%	0.10%	0.87%	74
Millburn township	Essex	8,531	2.88%	6.52%	3.45%	0.47%	3.33%	284
Montclair township	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Newark city	Essex	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Caldwell borough	Essex	8,531	0.19%	0.99%	2.23%	0.27%	0.92%	78
Nutley township	Essex	8,531	1.18%	0.00%	1.16%	0.30%	0.66%	56
Roseland borough	Essex	8,531	1.93%	0.00%	0.99%	0.24%	0.79%	67
S. Orange Village township	Essex	8,531	1.19%	10.50%	1.65%	0.16%	3.37%	288
Verona township	Essex	8,531	0.70%	0.00%	1.19%	0.29%	0.54%	46
West Caldwell township	Essex	8,531	1.59%	1.05%	0.95%	0.38%	0.99%	85
West Orange township	Essex	8,531	2.48%	0.00%	2.14%	4.10%	2.18%	186
Boonton town	Morris	8,531	0.53%	0.00%	0.67%	0.38%	0.40%	34
Boonton township	Morris	8,531	0.14%	0.12%	0.96%	0.63%	0.46%	39
Butler borough	Morris	8,531	0.60%	0.71%	0.56%	0.48%	0.59%	50
Chatham borough	Morris	8,531	0.68%	0.00%	1.75%	0.36%	0.70%	59
Chatham township	Morris	8,531	0.68%	5.84%	1.98%	0.97%	2.37%	202
Chester borough	Morris	8,531	0.32%	1.43%	0.63%	0.02%	0.60%	51
Chester township	Morris	8,531	0.32%	0.00%	1.98%	0.12%	0.61%	52
Denville township	Morris	8,531	1.60%	0.54%	1.40%	5.80%	2.33%	199
Dover town	Morris	8,531	1.01%	0.00%	0.20%	0.22%	0.36%	31
East Hanover township	Morris	8,531	2.93%	0.08%	1.11%	0.84%	1.24%	105
Florham Park borough	Morris	8,531	3.57%	16.57%	1.25%	3.12%	6.13%	523
Hanover township	Morris	8,531	2.81%	0.00%	1.20%	2.96%	1.74%	149
Harding township	Morris	8,531	0.34%	2.15%	1.85%	0.00%	1.08%	92
Jefferson township	Morris	8,531	0.70%	2.84%	1.14%	0.03%	1.18%	100

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Kinnelon borough	Morris	8,531	0.27%	1.21%	1.49%	0.00%	0.74%	63
Lincoln Park borough	Morris	8,531	0.57%	0.46%	0.61%	2.00%	0.91%	78
Long Hill township	Morris	8,531	0.50%	0.00%	1.05%	0.01%	0.39%	33
Madison borough	Morris	8,531	0.85%	0.00%	1.63%	0.54%	0.75%	64
Mendham borough	Morris	8,531	0.28%	0.00%	1.11%	0.36%	0.44%	37
Mendham township	Morris	8,531	0.18%	0.86%	1.92%	0.09%	0.76%	65
Mine Hill township	Morris	8,531	0.11%	0.72%	0.56%	2.69%	1.02%	87
Montville township	Morris	8,531	1.65%	0.00%	1.91%	2.68%	1.56%	133
Morris township	Morris	8,531	2.38%	8.26%	2.48%	4.63%	4.44%	378
Morris Plains borough	Morris	8,531	0.64%	0.00%	0.90%	0.84%	0.60%	51
Morristown town	Morris	8,531	3.25%	0.00%	0.73%	0.93%	1.23%	105
Mountain Lakes borough	Morris	8,531	0.41%	0.00%	1.66%	0.24%	0.58%	50
Mount Arlington borough	Morris	8,531	0.28%	1.19%	0.52%	0.56%	0.64%	55
Mount Olive township	Morris	8,531	1.98%	5.64%	1.25%	3.73%	3.15%	269
Netcong borough	Morris	8,531	0.27%	0.00%	0.05%	0.10%	0.11%	9
Parsippany-Troy Hills twp	Morris	8,531	9.73%	0.00%	2.05%	10.21%	5.50%	469
Pequannock township	Morris	8,531	0.88%	0.00%	0.91%	1.52%	0.83%	71
Randolph township	Morris	8,531	1.39%	1.17%	2.32%	3.46%	2.09%	178
Riverdale borough	Morris	8,531	0.62%	2.47%	0.50%	1.99%	1.40%	119
Rockaway borough	Morris	8,531	0.69%	1.56%	0.48%	0.31%	0.76%	65
Rockaway township	Morris	8,531	1.81%	2.90%	1.54%	5.54%	2.95%	252
Roxbury township	Morris	8,531	1.39%	0.00%	1.38%	5.76%	2.13%	182
Victory Gardens borough	Morris	8,531	0.03%	0.00%	0.00%	0.04%	0.02%	1
Washington township	Morris	8,531	0.67%	1.16%	1.77%	0.12%	0.93%	79
Wharton borough	Morris	8,531	0.48%	1.92%	0.34%	0.79%	0.88%	75
Berkeley Heights township	Union	8,531	1.38%	5.89%	1.80%	1.07%	2.54%	216
Clark township	Union	8,531	1.49%	0.00%	1.00%	0.54%	0.76%	65
Cranford township	Union	8,531	2.39%	0.00%	1.72%	0.23%	1.08%	92
Elizabeth city	Union	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Fanwood borough	Union	8,531	0.20%	0.00%	1.15%	0.14%	0.37%	32
Garwood borough	Union	8,531	0.38%	0.00%	0.47%	0.03%	0.22%	19
Hillside township	Union	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Kenilworth borough	Union	8,531	1.29%	0.00%	0.65%	0.22%	0.54%	46
Linden city	Union	8,531	3.01%	0.00%	0.57%	3.52%	1.78%	151
Mountainside borough	Union	8,531	0.95%	0.00%	1.36%	0.30%	0.65%	56
New Providence borough	Union	8,531	1.48%	0.00%	1.58%	0.41%	0.87%	74
Plainfield city	Union	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Rahway city	Union	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle borough	Union	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Roselle Park borough	Union	8,531	0.34%	0.00%	0.31%	0.08%	0.18%	16

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Scotch Plains township	Union	8,531	0.97%	0.00%	1.86%	0.93%	0.94%	80
Springfield township	Union	8,531	1.76%	0.00%	1.07%	0.17%	0.75%	64
Summit city	Union	8,531	2.83%	2.82%	2.80%	0.42%	2.22%	189
Union township	Union	8,531	5.25%	0.00%	1.48%	0.63%	1.84%	157
Westfield town	Union	8,531	1.70%	0.00%	3.16%	0.39%	1.31%	112
Winfield township	Union	8,531	0.02%	0.08%	0.10%	0.54%	0.18%	16
Allamuchy township	Warren	8,531	0.17%	1.31%	0.52%	0.69%	0.67%	57
Alpha borough	Warren	8,531	0.15%	0.65%	0.11%	1.08%	0.50%	43
Belvidere town	Warren	8,531	0.10%	0.00%	0.15%	0.00%	0.06%	5
Blairstown township	Warren	8,531	0.26%	0.00%	0.51%	0.00%	0.19%	17
Franklin township	Warren	8,531	0.12%	0.46%	0.63%	0.06%	0.32%	27
Frelinghuysen township	Warren	8,531	0.06%	0.42%	0.61%	1.88%	0.74%	63
Greenwich township	Warren	8,531	0.17%	0.86%	0.88%	2.47%	1.09%	93
Hackettstown town	Warren	8,531	1.01%	0.00%	0.36%	0.56%	0.48%	41
Hardwick township	Warren	8,531	0.04%	0.25%	0.62%	0.00%	0.23%	19
Harmony township	Warren	8,531	0.10%	0.12%	0.39%	0.13%	0.19%	16
Hope township	Warren	8,531	0.08%	0.25%	0.50%	0.00%	0.21%	18
Independence township	Warren	8,531	0.14%	0.04%	0.44%	0.17%	0.20%	17
Knowlton township	Warren	8,531	0.07%	0.00%	0.46%	0.00%	0.13%	11
Liberty township	Warren	8,531	0.06%	0.55%	0.50%	0.00%	0.28%	24
Lopatcong township	Warren	8,531	0.35%	0.00%	0.47%	2.91%	0.93%	79
Mansfield township	Warren	8,531	0.28%	2.35%	0.31%	0.00%	0.73%	63
Oxford township	Warren	8,531	0.18%	0.98%	0.24%	0.34%	0.43%	37
Phillipsburg town	Warren	8,531	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pohatcong township	Warren	8,531	0.43%	1.84%	0.33%	1.58%	1.05%	89
Washington borough	Warren	8,531	0.27%	0.00%	0.16%	0.00%	0.11%	9
Washington township	Warren	8,531	0.29%	1.79%	0.60%	1.25%	0.98%	84
White township	Warren	8,531	0.20%	0.00%	0.08%	2.49%	0.69%	59
Alexandria township	Hunterdon	6,576	0.15%	0.10%	1.58%	0.11%	0.49%	32
Bethlehem township	Hunterdon	6,576	0.10%	0.55%	1.49%	0.00%	0.54%	35
Bloomsbury borough	Hunterdon	6,576	0.18%	1.82%	0.68%	0.00%	0.67%	44
Califon borough	Hunterdon	6,576	0.05%	0.18%	1.17%	0.00%	0.35%	23
Clinton town	Hunterdon	6,576	0.27%	0.00%	0.87%	0.76%	0.48%	31
Clinton township	Hunterdon	6,576	1.01%	1.70%	2.01%	6.71%	2.86%	188
Delaware township	Hunterdon	6,576	0.10%	0.03%	1.33%	0.00%	0.37%	24
East Amwell township	Hunterdon	6,576	0.14%	0.38%	1.09%	0.00%	0.40%	26
Flemington borough	Hunterdon	6,576	0.73%	0.07%	0.00%	0.04%	0.21%	14
Franklin township	Hunterdon	6,576	0.14%	0.00%	0.74%	0.00%	0.22%	14
Frenchtown borough	Hunterdon	6,576	0.09%	0.45%	0.34%	0.00%	0.22%	14
Glen Gardner borough	Hunterdon	6,576	0.02%	0.00%	0.39%	0.00%	0.10%	7

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Hampton borough	Hunterdon	6,576	0.05%	0.28%	0.31%	0.03%	0.17%	11
High Bridge borough	Hunterdon	6,576	0.16%	0.36%	0.86%	0.13%	0.38%	25
Holland township	Hunterdon	6,576	0.11%	0.00%	0.94%	0.03%	0.27%	18
Kingwood township	Hunterdon	6,576	0.13%	0.22%	1.09%	0.00%	0.36%	24
Lambertville city	Hunterdon	6,576	0.24%	0.17%	0.65%	0.00%	0.26%	17
Lebanon borough	Hunterdon	6,576	0.20%	0.93%	0.62%	0.32%	0.52%	34
Lebanon township	Hunterdon	6,576	0.16%	0.00%	1.33%	0.00%	0.37%	24
Milford borough	Hunterdon	6,576	0.06%	0.00%	0.51%	0.20%	0.19%	13
Raritan township	Hunterdon	6,576	2.06%	2.85%	2.46%	3.03%	2.60%	171
Readington township	Hunterdon	6,576	1.81%	7.71%	2.47%	7.46%	4.86%	320
Stockton borough	Hunterdon	6,576	0.03%	0.11%	0.54%	0.00%	0.17%	11
Tewksbury township	Hunterdon	6,576	0.32%	0.34%	2.89%	0.36%	0.98%	64
Union township	Hunterdon	6,576	0.30%	0.00%	1.26%	1.53%	0.78%	51
West Amwell township	Hunterdon	6,576	0.13%	0.00%	1.00%	0.00%	0.28%	19
Carteret borough	Middlesex	6,576	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cranbury township	Middlesex	6,576	1.26%	0.00%	1.95%	1.82%	1.26%	83
Dunellen borough	Middlesex	6,576	0.15%	0.00%	0.55%	0.01%	0.18%	12
East Brunswick township	Middlesex	6,576	4.31%	1.12%	2.88%	2.88%	2.80%	184
Edison township	Middlesex	6,576	12.56%	0.00%	4.57%	3.79%	5.23%	344
Helmetta borough	Middlesex	6,576	0.03%	0.02%	0.50%	0.06%	0.15%	10
Highland Park borough	Middlesex	6,576	0.44%	0.00%	0.81%	0.11%	0.34%	22
Jamesburg borough	Middlesex	6,576	0.41%	1.96%	0.09%	0.22%	0.67%	44
Metuchen borough	Middlesex	6,576	1.04%	1.96%	1.63%	0.08%	1.18%	77
Middlesex borough	Middlesex	6,576	0.89%	0.00%	0.80%	0.21%	0.48%	31
Milltown borough	Middlesex	6,576	0.33%	0.00%	0.96%	0.15%	0.36%	24
Monroe township	Middlesex	6,576	1.90%	9.11%	1.92%	9.92%	5.71%	376
New Brunswick city	Middlesex	6,576	0.00%	0.00%	0.00%	0.00%	0.00%	0
North Brunswick township	Middlesex	6,576	3.81%	2.37%	1.61%	1.72%	2.38%	156
Old Bridge township	Middlesex	6,576	2.05%	0.83%	2.63%	6.16%	2.91%	192
Perth Amboy city	Middlesex	6,576	0.00%	0.00%	0.00%	0.00%	0.00%	0
Piscataway township	Middlesex	6,576	6.55%	0.00%	2.25%	2.19%	2.75%	181
Plainsboro township	Middlesex	6,576	2.75%	2.80%	1.96%	3.71%	2.81%	184
Sayreville borough	Middlesex	6,576	1.67%	1.66%	1.46%	1.97%	1.69%	111
South Amboy city	Middlesex	6,576	0.33%	0.03%	0.60%	0.41%	0.34%	22
South Brunswick township	Middlesex	6,576	4.41%	0.00%	3.18%	8.89%	4.12%	271
South Plainfield borough	Middlesex	6,576	3.82%	3.42%	1.35%	0.50%	2.27%	150
South River borough	Middlesex	6,576	0.42%	0.00%	0.40%	0.22%	0.26%	17
Spotswood borough	Middlesex	6,576	0.38%	0.00%	0.58%	0.20%	0.29%	19
Woodbridge township	Middlesex	6,576	9.58%	3.93%	2.40%	3.05%	4.74%	312
Bedminster township	Somerset	6,576	1.74%	0.84%	1.33%	0.60%	1.13%	74

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Bernards township	Somerset	6,576	2.86%	17.47%	4.15%	3.02%	6.88%	452
Bernardsville borough	Somerset	6,576	0.48%	0.00%	1.71%	0.49%	0.67%	44
Bound Brook borough	Somerset	6,576	0.41%	0.00%	0.31%	0.08%	0.20%	13
Branchburg township	Somerset	6,576	2.23%	4.93%	2.22%	2.49%	2.97%	195
Bridgewater township	Somerset	6,576	6.26%	0.00%	3.75%	3.55%	3.39%	223
Far Hills borough	Somerset	6,576	0.05%	0.00%	1.05%	0.18%	0.32%	21
Franklin township	Somerset	6,576	5.84%	8.20%	2.90%	5.03%	5.49%	361
Green Brook township	Somerset	6,576	0.61%	2.41%	1.70%	0.57%	1.32%	87
Hillsborough township	Somerset	6,576	1.95%	9.23%	3.21%	7.76%	5.54%	364
Manville borough	Somerset	6,576	0.33%	0.00%	0.27%	0.04%	0.16%	11
Millstone borough	Somerset	6,576	0.02%	0.22%	0.50%	0.07%	0.21%	13
Montgomery township	Somerset	6,576	2.22%	4.54%	3.85%	2.32%	3.23%	213
North Plainfield borough	Somerset	6,576	0.53%	0.19%	0.42%	0.03%	0.29%	19
Peapack & Gladstone bor.	Somerset	6,576	0.52%	3.09%	1.83%	0.01%	1.36%	90
Raritan borough	Somerset	6,576	1.59%	0.00%	0.57%	0.13%	0.57%	38
Rocky Hill borough	Somerset	6,576	0.06%	0.00%	0.68%	0.05%	0.20%	13
Somerville borough	Somerset	6,576	1.28%	0.00%	0.50%	0.09%	0.47%	31
South Bound Brook borough	Somerset	6,576	0.07%	0.00%	0.42%	0.01%	0.12%	8
Warren township	Somerset	6,576	2.22%	0.19%	3.35%	3.41%	2.29%	151
Watchung borough	Somerset	6,576	0.89%	1.23%	1.59%	1.04%	1.19%	78
East Windsor township	Mercer	4,978	1.54%	2.79%	1.45%	3.24%	2.25%	112
Ewing township	Mercer	4,978	6.55%	16.46%	1.35%	1.19%	6.39%	318
Hamilton township	Mercer	4,978	6.93%	11.25%	2.80%	3.74%	6.18%	308
Hightstown borough	Mercer	4,978	0.49%	0.00%	0.61%	0.14%	0.31%	15
Hopewell borough	Mercer	4,978	0.13%	0.00%	0.75%	0.00%	0.22%	11
Hopewell township	Mercer	4,978	2.44%	12.56%	2.49%	5.43%	5.73%	285
Lawrence township	Mercer	4,978	3.91%	1.56%	1.81%	1.90%	2.29%	114
Pennington borough	Mercer	4,978	0.39%	0.00%	0.97%	0.03%	0.35%	17
Princeton	Mercer	4,978	5.64%	5.97%	2.69%	1.89%	4.05%	202
Robbinsville township	Mercer	4,978	1.33%	2.98%	1.55%	2.86%	2.18%	109
Trenton city	Mercer	4,978	0.00%	0.00%	0.00%	0.00%	0.00%	0
West Windsor township	Mercer	4,978	4.83%	0.00%	3.20%	4.52%	3.14%	156
Aberdeen township	Monmouth	4,978	0.72%	0.43%	1.17%	0.43%	0.69%	34
Allenhurst borough	Monmouth	4,978	0.06%	0.00%	0.55%	0.01%	0.15%	8
Allentown borough	Monmouth	4,978	0.12%	0.00%	0.79%	0.00%	0.23%	11
Asbury Park city	Monmouth	4,978	0.00%	0.00%	0.00%	0.00%	0.00%	0
Atlantic Highlands borough	Monmouth	4,978	0.19%	0.00%	0.76%	0.08%	0.26%	13
Avon-by-the-Sea borough	Monmouth	4,978	0.07%	0.00%	0.48%	0.01%	0.14%	7
Belmar borough	Monmouth	4,978	0.21%	0.04%	0.45%	0.06%	0.19%	10
Bradley Beach borough	Monmouth	4,978	0.13%	0.13%	0.50%	0.03%	0.20%	10

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Brielle borough	Monmouth	4,978	0.26%	0.35%	1.05%	0.20%	0.46%	23
Colts Neck township	Monmouth	4,978	0.48%	0.30%	1.79%	0.00%	0.64%	32
Deal borough	Monmouth	4,978	0.07%	0.00%	0.57%	0.12%	0.19%	9
Eatontown borough	Monmouth	4,978	2.36%	1.05%	0.68%	0.51%	1.15%	57
Englishtown borough	Monmouth	4,978	0.13%	0.00%	0.60%	0.03%	0.19%	9
Fair Haven borough	Monmouth	4,978	0.15%	0.00%	1.52%	0.02%	0.42%	21
Farmingdale borough	Monmouth	4,978	0.11%	0.00%	0.30%	0.04%	0.11%	6
Freehold borough	Monmouth	4,978	0.84%	0.00%	0.44%	0.17%	0.36%	18
Freehold township	Monmouth	4,978	4.59%	3.06%	2.18%	3.50%	3.34%	166
Hazlet township	Monmouth	4,978	1.19%	0.00%	1.17%	0.36%	0.68%	34
Highlands borough	Monmouth	4,978	0.13%	0.00%	0.56%	0.07%	0.19%	9
Holmdel township	Monmouth	4,978	1.50%	0.00%	2.14%	0.43%	1.02%	51
Howell township	Monmouth	4,978	2.75%	3.88%	2.39%	1.69%	2.68%	133
Interlaken borough	Monmouth	4,978	0.01%	0.00%	1.01%	0.00%	0.26%	13
Keansburg borough	Monmouth	4,978	0.31%	0.49%	0.28%	0.08%	0.29%	14
Keyport borough	Monmouth	4,978	0.36%	0.00%	0.41%	0.06%	0.21%	10
Lake Como borough	Monmouth	4,978	0.06%	0.00%	0.34%	0.01%	0.10%	5
Little Silver borough	Monmouth	4,978	0.42%	0.00%	1.42%	0.12%	0.49%	24
Loch Arbour village	Monmouth	4,978	0.00%	0.00%	0.81%	0.01%	0.21%	10
Long Branch city	Monmouth	4,978	0.00%	0.00%	0.00%	0.00%	0.00%	0
Manalapan township	Monmouth	4,978	1.71%	0.21%	2.55%	2.27%	1.68%	84
Manasquan borough	Monmouth	4,978	0.31%	0.00%	0.82%	0.04%	0.29%	15
Marlboro township	Monmouth	4,978	2.03%	3.13%	3.38%	3.74%	3.07%	153
Matawan borough	Monmouth	4,978	0.55%	0.00%	0.91%	0.04%	0.37%	19
Middletown township	Monmouth	4,978	3.90%	1.69%	3.74%	2.67%	3.00%	149
Millstone township	Monmouth	4,978	0.39%	0.97%	1.63%	0.00%	0.75%	37
Monmouth Beach borough	Monmouth	4,978	0.07%	0.00%	0.75%	0.09%	0.23%	11
Neptune township	Monmouth	4,978	2.67%	1.15%	1.05%	0.05%	1.23%	61
Neptune City borough	Monmouth	4,978	0.47%	1.40%	0.52%	0.03%	0.60%	30
Ocean township	Monmouth	4,978	1.80%	0.18%	1.49%	1.12%	1.15%	57
Oceanport borough	Monmouth	4,978	0.76%	1.42%	0.90%	0.15%	0.81%	40
Red Bank borough	Monmouth	4,978	2.20%	0.00%	0.66%	0.15%	0.75%	38
Roosevelt borough	Monmouth	4,978	0.02%	0.00%	0.49%	0.00%	0.13%	6
Rumson borough	Monmouth	4,978	0.34%	0.47%	1.61%	0.23%	0.66%	33
Sea Bright borough	Monmouth	4,978	0.08%	0.00%	0.61%	0.00%	0.17%	9
Sea Girt borough	Monmouth	4,978	0.16%	0.55%	0.93%	0.02%	0.41%	21
Shrewsbury borough	Monmouth	4,978	1.14%	0.06%	1.03%	0.04%	0.57%	28
Shrewsbury township	Monmouth	4,978	0.14%	0.84%	0.24%	0.00%	0.30%	15
Spring Lake borough	Monmouth	4,978	0.18%	0.00%	1.05%	0.04%	0.32%	16
Spring Lake Heights bor.	Monmouth	4,978	0.19%	0.00%	0.53%	0.03%	0.19%	9

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Tinton Falls borough	Monmouth	4,978	2.20%	4.46%	1.06%	1.65%	2.34%	117
Union Beach borough	Monmouth	4,978	0.20%	0.51%	0.59%	0.14%	0.36%	18
Upper Freehold township	Monmouth	4,978	0.35%	0.18%	1.27%	0.00%	0.45%	23
Wall township	Monmouth	4,978	3.36%	1.47%	1.81%	6.39%	3.26%	162
West Long Branch borough	Monmouth	4,978	1.04%	0.00%	0.80%	0.17%	0.50%	25
Barnegat township	Ocean	4,978	0.50%	0.96%	0.77%	3.80%	1.51%	75
Barnegat Light borough	Ocean	4,978	0.03%	0.09%	0.50%	0.00%	0.16%	8
Bay Head borough	Ocean	4,978	0.04%	0.00%	0.57%	0.02%	0.16%	8
Beach Haven borough	Ocean	4,978	0.12%	0.21%	0.50%	0.00%	0.21%	10
Beachwood borough	Ocean	4,978	0.17%	0.00%	0.79%	0.11%	0.27%	13
Berkeley township	Ocean	4,978	0.99%	1.18%	0.87%	4.43%	1.87%	93
Brick township	Ocean	4,978	3.96%	5.92%	2.45%	1.58%	3.48%	173
Eagleswood township	Ocean	4,978	0.11%	0.25%	0.42%	1.56%	0.59%	29
Harvey Cedars borough	Ocean	4,978	0.02%	0.00%	0.60%	0.00%	0.15%	8
Island Heights borough	Ocean	4,978	0.06%	0.04%	0.53%	0.05%	0.17%	8
Jackson township	Ocean	4,978	2.07%	3.28%	2.45%	10.39%	4.55%	226
Lacey township	Ocean	4,978	1.09%	1.13%	1.14%	1.87%	1.31%	65
Lakehurst borough	Ocean	4,978	0.11%	0.00%	0.35%	0.06%	0.13%	6
Lakewood township	Ocean	4,978	0.00%	0.00%	0.00%	0.00%	0.00%	0
Lavallette borough	Ocean	4,978	0.06%	0.00%	0.43%	0.00%	0.12%	6
Little Egg Harbor township	Ocean	4,978	0.45%	0.00%	0.69%	5.11%	1.56%	78
Long Beach township	Ocean	4,978	0.18%	0.15%	0.68%	0.00%	0.25%	13
Manchester township	Ocean	4,978	0.99%	1.61%	0.65%	7.33%	2.64%	132
Mantoloking borough	Ocean	4,978	0.00%	0.00%	1.10%	0.00%	0.28%	14
Ocean township	Ocean	4,978	0.25%	0.54%	0.68%	2.63%	1.02%	51
Ocean Gate borough	Ocean	4,978	0.02%	0.00%	0.37%	0.02%	0.10%	5
Pine Beach borough	Ocean	4,978	0.05%	0.03%	0.63%	0.01%	0.18%	9
Plumsted township	Ocean	4,978	0.25%	0.45%	0.64%	0.01%	0.34%	17
Point Pleasant borough	Ocean	4,978	0.75%	0.00%	1.10%	0.24%	0.52%	26
Point Pleasant Beach bor.	Ocean	4,978	0.59%	0.74%	0.54%	0.23%	0.53%	26
Seaside Heights borough	Ocean	4,978	0.10%	0.00%	0.00%	0.00%	0.02%	1
Seaside Park borough	Ocean	4,978	0.03%	0.00%	0.28%	0.00%	0.08%	4
Ship Bottom borough	Ocean	4,978	0.09%	0.00%	0.32%	0.00%	0.10%	5
South Toms River borough	Ocean	4,978	0.08%	0.00%	0.39%	0.09%	0.14%	7
Stafford township	Ocean	4,978	1.56%	0.62%	1.13%	2.24%	1.38%	69
Surf City borough	Ocean	4,978	0.09%	0.12%	0.39%	0.00%	0.15%	7
Toms River township	Ocean	4,978	7.35%	0.07%	3.20%	5.59%	4.05%	202
Tuckerton borough	Ocean	4,978	0.20%	0.63%	0.36%	0.60%	0.45%	22
Bass River township	Burlington	5,370	0.04%	0.00%	0.38%	0.00%	0.11%	6
Beverly city	Burlington	5,370	0.06%	0.00%	0.27%	0.05%	0.10%	5

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Bordentown city	Burlington	5,370	0.27%	0.00%	0.60%	0.23%	0.28%	15
Bordentown township	Burlington	5,370	0.82%	0.00%	1.29%	1.66%	0.94%	51
Burlington city	Burlington	5,370	0.89%	0.00%	0.38%	0.15%	0.35%	19
Burlington township	Burlington	5,370	2.96%	3.38%	1.58%	3.72%	2.91%	156
Chesterfield township	Burlington	5,370	0.27%	0.00%	1.58%	0.00%	0.46%	25
Cinnaminson township	Burlington	5,370	1.79%	0.00%	1.76%	0.84%	1.10%	59
Delanco township	Burlington	5,370	0.24%	0.00%	0.72%	0.73%	0.42%	23
Delran township	Burlington	5,370	1.32%	4.10%	1.48%	0.76%	1.92%	103
Eastampton township	Burlington	5,370	0.58%	3.58%	0.65%	0.29%	1.27%	68
Edgewater Park township	Burlington	5,370	0.51%	2.11%	0.51%	0.82%	0.99%	53
Evesham township	Burlington	5,370	5.91%	11.05%	3.60%	1.67%	5.56%	298
Fieldsboro borough	Burlington	5,370	0.01%	0.00%	0.44%	0.03%	0.12%	6
Florence township	Burlington	5,370	0.61%	0.72%	1.15%	1.36%	0.96%	52
Hainesport township	Burlington	5,370	0.82%	1.59%	1.02%	0.99%	1.11%	59
Lumberton township	Burlington	5,370	1.24%	5.69%	1.36%	1.09%	2.35%	126
Mansfield township	Burlington	5,370	0.49%	1.49%	1.18%	1.78%	1.23%	66
Maple Shade township	Burlington	5,370	1.29%	1.35%	0.71%	0.16%	0.88%	47
Medford township	Burlington	5,370	1.89%	0.55%	2.89%	2.05%	1.85%	99
Medford Lakes borough	Burlington	5,370	0.07%	0.00%	1.35%	0.01%	0.36%	19
Moorestown township	Burlington	5,370	6.16%	2.49%	3.61%	1.41%	3.42%	184
Mount Holly township	Burlington	5,370	1.49%	0.00%	0.64%	0.30%	0.61%	33
Mount Laurel township	Burlington	5,370	8.34%	5.04%	3.54%	3.12%	5.01%	269
New Hanover township	Burlington	5,370	0.46%	2.45%	0.78%	0.00%	0.92%	49
North Hanover township	Burlington	5,370	0.22%	0.00%	0.50%	0.00%	0.18%	10
Palmyra borough	Burlington	5,370	0.39%	0.00%	0.62%	0.47%	0.37%	20
Pemberton borough	Burlington	5,370	0.04%	0.00%	0.44%	0.00%	0.12%	6
Pemberton township	Burlington	5,370	1.39%	0.00%	0.93%	0.83%	0.79%	42
Riverside township	Burlington	5,370	0.19%	0.00%	0.42%	0.11%	0.18%	10
Riverton borough	Burlington	5,370	0.13%	0.27%	0.99%	0.02%	0.35%	19
Shamong township	Burlington	5,370	0.19%	0.09%	1.31%	0.11%	0.42%	23
Southampton township	Burlington	5,370	0.54%	0.00%	0.60%	0.17%	0.33%	18
Springfield township	Burlington	5,370	0.30%	1.37%	1.05%	0.00%	0.68%	37
Tabernacle township	Burlington	5,370	0.25%	0.37%	1.25%	0.36%	0.56%	30
Washington township	Burlington	5,370	0.03%	0.00%	0.53%	0.00%	0.14%	8
Westampton township	Burlington	5,370	1.32%	2.20%	1.47%	3.69%	2.17%	116
Willingboro township	Burlington	5,370	1.46%	0.00%	1.29%	0.71%	0.87%	46
Woodland township	Burlington	5,370	0.26%	1.25%	0.70%	0.00%	0.55%	30
Wrightstown borough	Burlington	5,370	0.18%	0.85%	0.00%	0.00%	0.26%	14
Audubon borough	Camden	5,370	0.43%	0.00%	0.89%	0.02%	0.33%	18
Audubon Park borough	Camden	5,370	0.07%	0.36%	0.12%	0.00%	0.14%	7

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Barrington borough	Camden	5,370	0.32%	0.00%	0.64%	0.07%	0.26%	14
Bellmawr borough	Camden	5,370	0.88%	0.00%	0.40%	0.28%	0.39%	21
Berlin borough	Camden	5,370	0.90%	0.00%	0.98%	0.77%	0.66%	36
Berlin township	Camden	5,370	1.04%	1.42%	0.53%	1.06%	1.01%	54
Brooklawn borough	Camden	5,370	0.12%	0.43%	0.32%	0.02%	0.23%	12
Camden city	Camden	5,370	0.00%	0.00%	0.00%	0.00%	0.00%	0
Cherry Hill township	Camden	5,370	12.48%	11.28%	5.46%	1.70%	7.73%	415
Chesilhurst borough	Camden	5,370	0.04%	0.12%	0.35%	0.25%	0.19%	10
Clementon borough	Camden	5,370	0.28%	0.73%	0.10%	0.13%	0.31%	17
Collingswood borough	Camden	5,370	0.80%	0.00%	0.72%	0.08%	0.40%	21
Gibbsboro borough	Camden	5,370	0.32%	0.00%	0.76%	0.62%	0.42%	23
Gloucester township	Camden	5,370	3.51%	5.40%	2.67%	4.83%	4.10%	220
Gloucester City	Camden	5,370	0.00%	0.00%	0.00%	0.00%	0.00%	0
Haddon township	Camden	5,370	0.54%	0.81%	1.27%	0.09%	0.68%	36
Haddonfield borough	Camden	5,370	1.06%	0.59%	2.45%	0.07%	1.04%	56
Haddon Heights borough	Camden	5,370	0.44%	0.03%	1.21%	0.01%	0.43%	23
Hi-Nella borough	Camden	5,370	0.01%	0.00%	0.06%	0.03%	0.03%	1
Laurel Springs borough	Camden	5,370	0.05%	0.02%	0.83%	0.02%	0.23%	12
Lawnside borough	Camden	5,370	0.53%	0.00%	0.31%	0.42%	0.31%	17
Lindenwold borough	Camden	5,370	0.00%	0.00%	0.00%	0.00%	0.00%	0
Magnolia borough	Camden	5,370	0.20%	0.34%	0.35%	0.06%	0.24%	13
Merchantville borough	Camden	5,370	0.14%	0.00%	0.40%	0.01%	0.14%	7
Mount Ephraim borough	Camden	5,370	0.19%	0.00%	0.57%	0.04%	0.20%	11
Oaklyn borough	Camden	5,370	0.28%	0.94%	0.52%	0.01%	0.44%	23
Pennsauken township	Camden	5,370	0.00%	0.00%	0.00%	0.00%	0.00%	0
Pine Hill borough	Camden	5,370	0.30%	0.00%	0.44%	0.94%	0.42%	23
Pine Valley borough	Camden	5,370	0.00%	0.00%	0.00%	0.70%	0.18%	9
Runnemede borough	Camden	5,370	0.57%	0.09%	0.41%	0.20%	0.32%	17
Somerdale borough	Camden	5,370	0.38%	0.40%	0.28%	0.17%	0.31%	17
Stratford borough	Camden	5,370	0.42%	0.00%	0.61%	0.04%	0.27%	14
Tavistock borough	Camden	5,370	0.03%	0.25%	0.00%	0.00%	0.07%	4
Voorhees township	Camden	5,370	4.02%	1.78%	2.57%	1.85%	2.55%	137
Waterford township	Camden	5,370	0.38%	0.00%	0.86%	0.64%	0.47%	25
Winslow township	Camden	5,370	1.54%	1.39%	1.84%	5.63%	2.60%	140
Woodlynne borough	Camden	5,370	0.04%	0.00%	0.04%	0.02%	0.03%	1
Clayton borough	Gloucester	5,370	0.27%	0.16%	0.54%	1.21%	0.55%	29
Deptford township	Gloucester	5,370	3.14%	0.00%	1.42%	5.50%	2.52%	135
East Greenwich township	Gloucester	5,370	0.40%	0.41%	1.66%	3.20%	1.42%	76
Elk township	Gloucester	5,370	0.15%	0.00%	0.78%	3.80%	1.18%	64
Franklin township	Gloucester	5,370	0.78%	0.10%	1.27%	3.58%	1.43%	77

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Glassboro borough	Gloucester	5,370	1.93%	3.30%	0.77%	1.91%	1.98%	106
Greenwich township	Gloucester	5,370	0.36%	0.26%	0.57%	1.16%	0.59%	32
Harrison township	Gloucester	5,370	0.61%	1.79%	2.23%	3.66%	2.07%	111
Logan township	Gloucester	5,370	2.01%	5.65%	0.93%	4.05%	3.16%	170
Mantua township	Gloucester	5,370	0.98%	1.92%	1.32%	2.90%	1.78%	96
Monroe township	Gloucester	5,370	1.46%	0.42%	1.66%	5.13%	2.17%	116
National Park borough	Gloucester	5,370	0.05%	0.00%	0.43%	0.06%	0.13%	7
Newfield borough	Gloucester	5,370	0.04%	0.00%	0.40%	0.00%	0.11%	6
Paulsboro borough	Gloucester	5,370	0.38%	1.21%	0.06%	0.17%	0.46%	24
Pitman borough	Gloucester	5,370	0.44%	0.00%	0.82%	0.07%	0.33%	18
South Harrison township	Gloucester	5,370	0.12%	0.04%	1.33%	0.01%	0.37%	20
Swedesboro borough	Gloucester	5,370	0.23%	0.46%	0.54%	0.08%	0.33%	18
Washington township	Gloucester	5,370	3.38%	3.61%	2.94%	4.14%	3.52%	189
Wenonah borough	Gloucester	5,370	0.06%	0.05%	1.10%	0.04%	0.31%	17
West Deptford township	Gloucester	5,370	2.49%	0.00%	1.20%	4.18%	1.96%	105
Westville borough	Gloucester	5,370	0.34%	0.00%	0.31%	0.06%	0.18%	10
Woodbury city	Gloucester	5,370	1.87%	1.94%	0.51%	0.24%	1.14%	61
Woodbury Heights borough	Gloucester	5,370	0.31%	0.29%	0.85%	0.18%	0.41%	22
Woolwich township	Gloucester	5,370	0.45%	0.00%	1.82%	4.21%	1.62%	87
Absecon city	Atlantic	(286)	1.97%	0.00%	1.77%	1.08%	1.20%	0
Atlantic City	Atlantic	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Brigantine city	Atlantic	(286)	1.14%	0.00%	2.45%	0.00%	0.90%	0
Buena borough	Atlantic	(286)	0.48%	0.00%	0.79%	0.21%	0.37%	0
Buena Vista township	Atlantic	(286)	1.31%	0.06%	0.99%	0.21%	0.64%	0
Corbin City	Atlantic	(286)	0.04%	0.00%	0.99%	0.00%	0.26%	0
Egg Harbor township	Atlantic	(286)	10.82%	17.92%	6.79%	11.39%	11.73%	0
Egg Harbor City	Atlantic	(286)	1.11%	0.00%	0.42%	0.39%	0.48%	0
Estell Manor city	Atlantic	(286)	0.15%	0.08%	1.29%	0.00%	0.38%	0
Folsom borough	Atlantic	(286)	0.49%	0.00%	1.06%	0.00%	0.39%	0
Galloway township	Atlantic	(286)	8.70%	17.36%	4.73%	10.17%	10.24%	0
Hamilton township	Atlantic	(286)	8.34%	7.26%	3.32%	5.74%	6.17%	0
Hammonton town	Atlantic	(286)	5.19%	0.00%	2.38%	3.85%	2.85%	0
Linwood city	Atlantic	(286)	2.21%	0.00%	3.38%	0.35%	1.48%	0
Longport borough	Atlantic	(286)	0.06%	0.10%	1.59%	0.03%	0.44%	0
Margate City	Atlantic	(286)	1.20%	1.43%	2.93%	0.08%	1.41%	0
Mullica township	Atlantic	(286)	0.78%	1.80%	1.74%	0.33%	1.16%	0
Northfield city	Atlantic	(286)	2.91%	0.00%	2.16%	0.68%	1.44%	0
Pleasantville city	Atlantic	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Port Republic city	Atlantic	(286)	0.10%	0.30%	1.62%	0.02%	0.51%	0
Somers Point city	Atlantic	(286)	4.73%	0.00%	1.21%	0.21%	1.53%	0

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Ventnor City	Atlantic	(286)	1.16%	0.00%	2.02%	0.05%	0.81%	0
Weymouth township	Atlantic	(286)	0.19%	0.20%	0.87%	0.00%	0.31%	0
Avalon borough	Cape May	(286)	0.63%	0.47%	2.31%	0.00%	0.86%	0
Cape May city	Cape May	(286)	1.83%	5.88%	0.74%	0.00%	2.11%	0
Cape May Point borough	Cape May	(286)	0.01%	0.00%	0.93%	0.00%	0.24%	0
Dennis township	Cape May	(286)	1.25%	1.63%	1.98%	2.29%	1.79%	0
Lower township	Cape May	(286)	3.14%	0.00%	2.74%	1.28%	1.79%	0
Middle township	Cape May	(286)	7.49%	2.77%	2.91%	3.55%	4.18%	0
North Wildwood city	Cape May	(286)	0.56%	0.11%	0.77%	0.00%	0.36%	0
Ocean City	Cape May	(286)	3.50%	0.00%	2.89%	0.00%	1.60%	0
Sea Isle City	Cape May	(286)	0.50%	0.00%	1.01%	0.00%	0.38%	0
Stone Harbor borough	Cape May	(286)	0.40%	0.00%	1.12%	0.00%	0.38%	0
Upper township	Cape May	(286)	2.50%	0.00%	3.34%	5.66%	2.88%	0
West Cape May borough	Cape May	(286)	0.16%	0.06%	0.45%	0.00%	0.17%	0
West Wildwood borough	Cape May	(286)	0.02%	0.02%	0.46%	0.00%	0.12%	0
Wildwood city	Cape May	(286)	1.63%	0.00%	0.01%	0.00%	0.41%	0
Wildwood Crest borough	Cape May	(286)	0.44%	0.00%	1.61%	0.00%	0.51%	0
Woodbine borough	Cape May	(286)	0.38%	1.60%	0.10%	1.69%	0.94%	0
Bridgeton city	Cumberland	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Commercial township	Cumberland	(286)	0.32%	0.00%	0.67%	0.00%	0.25%	0
Deerfield township	Cumberland	(286)	1.07%	3.09%	1.43%	0.00%	1.40%	0
Downe township	Cumberland	(286)	0.15%	0.29%	0.46%	0.00%	0.23%	0
Fairfield township	Cumberland	(286)	1.43%	4.13%	0.63%	5.20%	2.85%	0
Greenwich township	Cumberland	(286)	0.03%	0.00%	1.17%	0.00%	0.30%	0
Hopewell township	Cumberland	(286)	0.89%	0.00%	1.31%	8.28%	2.62%	0
Lawrence township	Cumberland	(286)	0.31%	0.00%	1.42%	0.00%	0.43%	0
Maurice River township	Cumberland	(286)	0.63%	2.00%	1.25%	0.00%	0.97%	0
Millville city	Cumberland	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Shiloh borough	Cumberland	(286)	0.02%	0.00%	1.43%	0.00%	0.36%	0
Stow Creek township	Cumberland	(286)	0.12%	0.00%	1.23%	0.00%	0.34%	0
Upper Deerfield township	Cumberland	(286)	2.76%	7.41%	1.30%	6.71%	4.54%	0
Vineland city	Cumberland	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Alloway township	Salem	(286)	0.53%	0.51%	1.90%	0.00%	0.73%	0
Carneys Point township	Salem	(286)	2.57%	5.54%	1.16%	10.89%	5.04%	0
Elmer borough	Salem	(286)	0.65%	2.80%	1.03%	0.00%	1.12%	0
Elsinboro township	Salem	(286)	0.06%	0.16%	1.06%	0.00%	0.32%	0
Lower Alloways Creek twp	Salem	(286)	2.10%	6.77%	1.18%	0.00%	2.51%	0
Mannington township	Salem	(286)	1.11%	1.64%	1.12%	0.00%	0.97%	0
Oldmans township	Salem	(286)	0.62%	0.92%	1.42%	13.10%	4.01%	0
Penns Grove borough	Salem	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0

Municipality	County	Regional Prospective Need	Employ Level Share	Employ Change Share	Income Diff Share	Develop-able Land Share	Averaged Share	Allocated Prospective Need
Pennsville township	Salem	(286)	2.57%	0.00%	2.16%	5.34%	2.52%	0
Pilesgrove township	Salem	(286)	1.39%	5.70%	2.06%	1.23%	2.59%	0
Pittsgrove township	Salem	(286)	1.44%	0.00%	2.60%	0.00%	1.01%	0
Quinton township	Salem	(286)	0.24%	0.00%	1.06%	0.00%	0.33%	0
Salem city	Salem	(286)	0.00%	0.00%	0.00%	0.00%	0.00%	0
Upper Pittsgrove township	Salem	(286)	0.78%	0.00%	1.52%	0.00%	0.58%	0
Woodstown borough	Salem	(286)	0.67%	0.00%	1.60%	0.00%	0.57%	0

APPENDIX C: SECONDARY SOURCE ADJUSTMENTS TO MUNICIPAL ALLOCATIONS

TABLE C.1: SECONDARY SOURCE ADJUSTMENTS TO MUNICIPAL ALLOCATIONS

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Allendale borough	Bergen	1	(5)	4	0	(1)	(4)	22	78
Alpine borough	Bergen	1	(21)	0	0	(21)	(5)	4	113
Bergenfield borough	Bergen	1	(37)	64	11	38	(8)	177	33
Bogota borough	Bergen	1	(2)	21	2	21	(4)	89	0
Carlstadt borough	Bergen	1	(19)	46	7	34	(3)	38	50
Cliffside Park borough	Bergen	1	(108)	109	(7)	(6)	(8)	173	39
Closter borough	Bergen	1	(66)	7	0	(59)	(5)	0	127
Cresskill borough	Bergen	1	(29)	2	0	(27)	(11)	57	235
Demarest borough	Bergen	1	(38)	3	0	(35)	(3)	0	89
Dumont borough	Bergen	1	(38)	32	1	(5)	(5)	46	86
East Rutherford borough	Bergen	1	(11)	63	(21)	31	(11)	235	38
Edgewater borough	Bergen	1	(40)	22	(52)	(70)	(11)	0	284
Elmwood Park borough	Bergen	1	(12)	119	2	109	(3)	51	34
Emerson borough	Bergen	1	(14)	4	0	(10)	(7)	82	83
Englewood city	Bergen	1	(39)	78	(54)	(15)	(24)	445	154
Englewood Cliffs borough	Bergen	1	(70)	1	0	(69)	(9)	0	239
Fair Lawn borough	Bergen	1	(26)	58	(9)	23	(16)	202	209
Fairview borough	Bergen	1	(45)	95	44	94	(8)	194	0
Fort Lee borough	Bergen	1	(99)	83	46	30	(16)	315	84
Franklin Lakes borough	Bergen	1	(71)	1	0	(70)	(13)	41	293
Garfield city	Bergen	1	(30)	279	260	509	0	0	0
Glen Rock borough	Bergen	1	(6)	3	0	(3)	(4)	17	94
Hackensack city	Bergen	1	(65)	149	309	393	(9)	225	0
Harrington Park borough	Bergen	1	(17)	4	0	(13)	(4)	6	101
Hasbrouck Heights borough	Bergen	1	(22)	28	(4)	2	(13)	74	257
Haworth borough	Bergen	1	(14)	0	0	(14)	(2)	0	62
Hillsdale borough	Bergen	1	(16)	8	0	(8)	(4)	15	91
Ho-Ho-Kus borough	Bergen	1	(13)	2	0	(11)	(4)	11	79
Leonia borough	Bergen	1	(61)	19	1	(41)	(7)	83	101
Little Ferry borough	Bergen	1	(5)	45	(8)	32	(7)	176	6
Lodi borough	Bergen	1	(28)	189	350	511	0	0	0
Lyndhurst township	Bergen	1	(15)	141	5	131	(9)	237	0
Mahwah township	Bergen	1	(26)	20	20	14	(14)	83	273
Maywood borough	Bergen	1	(26)	32	3	9	(3)	33	38
Midland Park borough	Bergen	1	(7)	14	(28)	(21)	(4)	39	62
Montvale borough	Bergen	1	(15)	10	0	(5)	(9)	2	229
Moonachie borough	Bergen	1	(5)	3	2	0	(3)	35	50

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
New Milford borough	Bergen	1	(21)	48	(4)	23	(4)	46	44
North Arlington borough	Bergen	1	(7)	99	13	105	(6)	156	0
Northvale borough	Bergen	1	(12)	8	(2)	(6)	(2)	3	47
Norwood borough	Bergen	1	(20)	6	5	(9)	(2)	0	56
Oakland borough	Bergen	1	(16)	2	5	(9)	(8)	38	170
Old Tappan borough	Bergen	1	(40)	3	0	(37)	(9)	14	204
Oradell borough	Bergen	1	(10)	4	0	(6)	(3)	15	73
Palisades Park borough	Bergen	1	(142)	109	(62)	(95)	(11)	163	123
Paramus borough	Bergen	1	(83)	17	16	(50)	(23)	186	398
Park Ridge borough	Bergen	1	(27)	16	1	(10)	(9)	141	80
Ramsey borough	Bergen	1	(21)	17	0	(4)	(8)	59	147
Ridgefield borough	Bergen	1	(41)	61	7	27	(8)	167	27
Ridgefield Park village	Bergen	1	(1)	59	1	59	(6)	163	0
Ridgewood village	Bergen	1	(31)	32	0	1	(9)	14	228
River Edge borough	Bergen	1	(6)	20	1	15	(5)	46	94
River Vale township	Bergen	1	(25)	4	0	(21)	(5)	29	92
Rochelle Park township	Bergen	1	(2)	15	0	13	(1)	0	28
Rockleigh borough	Bergen	1	(1)	0	0	(1)	(6)	0	145
Rutherford borough	Bergen	1	(22)	56	1	35	(13)	195	130
Saddle Brook township	Bergen	1	(20)	49	(10)	19	(4)	43	68
Saddle River borough	Bergen	1	(37)	2	0	(35)	(11)	67	208
South Hackensack township	Bergen	1	(4)	18	(5)	9	(4)	72	29
Teaneck township	Bergen	1	(54)	38	(15)	(31)	(30)	121	639
Tenafly borough	Bergen	1	(91)	19	0	(72)	(8)	27	173
Teterboro borough	Bergen	1	0	1	0	1	(3)	0	78
Upper Saddle River borough	Bergen	1	(66)	3	0	(63)	(10)	8	255
Waldwick borough	Bergen	1	(10)	8	0	(2)	(5)	76	63
Wallington borough	Bergen	1	(8)	88	95	175	0	0	0
Washington township	Bergen	1	(10)	2	0	(8)	(7)	0	171
Westwood borough	Bergen	1	(11)	24	1	14	(4)	68	41
Woodcliff Lake borough	Bergen	1	(18)	0	0	(18)	(9)	22	199
Wood-Ridge borough	Bergen	1	(13)	21	(5)	3	(1)	0	33
Wyckoff township	Bergen	1	(38)	5	0	(33)	(10)	53	189
Bayonne city	Hudson	1	(14)	785	265	1,036	0	0	0
East Newark borough	Hudson	1	(1)	35	(7)	27	0	0	0
Guttenberg town	Hudson	1	(33)	100	95	162	0	0	0
Harrison town	Hudson	1	(41)	186	48	193	(8)	192	0
Hoboken city	Hudson	1	(47)	289	(99)	143	(7)	169	0
Jersey City	Hudson	1	(551)	2,281	1,099	2,829	(68)	1,740	0
Kearny town	Hudson	1	(34)	406	47	419	0	0	0
North Bergen township	Hudson	1	(37)	540	371	874	0	0	0
Secaucus town	Hudson	1	(22)	121	(26)	73	(8)	55	160
Union City	Hudson	1	(103)	552	771	1,220	(19)	471	0

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Weehawken township	Hudson	1	(5)	144	(10)	129	(3)	69	0
West New York town	Hudson	1	(30)	298	451	719	(2)	57	0
Bloomingdale borough	Passaic	1	(6)	18	2	14	(4)	53	58
Clifton city	Passaic	1	(28)	575	47	594	(50)	1,260	0
Haledon borough	Passaic	1	(4)	73	3	72	(1)	36	0
Hawthorne borough	Passaic	1	(7)	136	(11)	118	(2)	57	0
Little Falls township	Passaic	1	(25)	54	(4)	25	(7)	114	75
North Haledon borough	Passaic	1	(7)	14	3	10	(4)	0	91
Passaic city	Passaic	1	(44)	449	458	863	(168)	4,280	0
Paterson city	Passaic	1	(432)	1,533	1,971	3,072	(21)	543	0
Pompton Lakes borough	Passaic	1	(22)	26	(6)	(2)	(4)	50	61
Prospect Park borough	Passaic	1	(1)	83	2	84	0	0	0
Ringwood borough	Passaic	1	(9)	3	0	(6)	(2)	9	47
Totowa borough	Passaic	1	(1)	47	3	49	(9)	116	100
Wanaque borough	Passaic	1	(6)	23	(5)	12	(8)	69	123
Wayne township	Passaic	1	(55)	46	18	9	(34)	180	678
West Milford township	Passaic	1	(2)	13	15	26	(4)	54	36
Woodland Park borough	Passaic	1	(6)	71	4	69	(10)	210	38
Andover borough	Sussex	1	(1)	2	0	1	0	0	12
Andover township	Sussex	1	(10)	3	3	(4)	(9)	7	228
Branchville borough	Sussex	1	(1)	4	1	4	(6)	1	140
Byram township	Sussex	1	(5)	3	3	1	(4)	31	79
Frankford township	Sussex	1	(20)	2	4	(14)	(3)	35	42
Franklin borough	Sussex	1	(8)	9	7	8	(1)	24	8
Fredon township	Sussex	1	(2)	0	0	(2)	(4)	26	83
Green township	Sussex	1	(1)	0	0	(1)	(2)	0	40
Hamburg borough	Sussex	1	(2)	2	1	1	(1)	14	10
Hampton township	Sussex	1	(2)	2	5	5	(1)	8	21
Hardyston township	Sussex	1	(10)	7	34	31	(15)	23	364
Hopatcong borough	Sussex	1	(18)	6	17	5	(6)	60	82
Lafayette township	Sussex	1	(3)	2	1	0	(3)	0	68
Montague township	Sussex	1	(2)	10	6	14	(2)	0	38
Newton town	Sussex	1	(1)	20	72	91	(5)	117	0
Ogdensburg borough	Sussex	1	(1)	3	2	4	(1)	7	9
Sandyston township	Sussex	1	(1)	0	2	1	(1)	6	32
Sparta township	Sussex	1	(19)	9	0	(10)	(11)	35	235
Stanhope borough	Sussex	1	(3)	7	4	8	(1)	6	28
Stillwater township	Sussex	1	(2)	2	3	3	(2)	0	39
Sussex borough	Sussex	1	(4)	9	49	54	0	0	0
Vernon township	Sussex	1	(22)	6	25	9	(12)	48	246
Walpack township	Sussex	1	0	0	0	0	0	0	0
Wantage township	Sussex	1	(8)	8	15	15	(1)	5	19
Belleville township	Essex	2	(19)	86	2	69	(89)	1,001	0

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Bloomfield township	Essex	2	(15)	114	(26)	73	(42)	480	0
Caldwell borough	Essex	2	(6)	17	2	13	(2)	21	4
Cedar Grove township	Essex	2	(6)	9	6	9	(5)	15	45
City of Orange township	Essex	2	(186)	84	361	259	(75)	843	0
East Orange city	Essex	2	(289)	172	881	764	0	0	0
Essex Fells borough	Essex	2	(7)	0	0	(7)	(4)	0	40
Fairfield township	Essex	2	(11)	2	2	(7)	(16)	70	107
Glen Ridge borough	Essex	2	(1)	2	0	1	(6)	28	39
Irvington township	Essex	2	(78)	189	1,238	1,349	0	0	0
Livingston township	Essex	2	(38)	2	0	(36)	(19)	21	195
Maplewood township	Essex	2	0	26	1	27	(14)	123	33
Millburn township	Essex	2	(120)	11	0	(109)	(44)	144	349
Montclair township	Essex	2	(20)	67	(6)	41	(2)	20	0
Newark city	Essex	2	(1,026)	935	4,935	4,844	0	0	0
North Caldwell borough	Essex	2	(8)	1	0	(7)	(10)	37	75
Nutley township	Essex	2	(31)	42	13	24	(34)	390	0
Roseland borough	Essex	2	(5)	2	0	(3)	(6)	0	64
S. Orange Village township	Essex	2	(1)	6	0	5	(23)	0	260
Verona township	Essex	2	(15)	12	(10)	(13)	(5)	0	54
West Caldwell township	Essex	2	(5)	1	5	1	(11)	54	73
West Orange township	Essex	2	(5)	64	56	115	(40)	427	31
Boonton town	Morris	2	(6)	8	8	10	(5)	38	19
Boonton township	Morris	2	(5)	0	0	(5)	(6)	25	38
Butler borough	Morris	2	(3)	5	8	10	(6)	30	34
Chatham borough	Morris	2	(24)	2	0	(22)	(7)	0	74
Chatham township	Morris	2	(57)	1	3	(53)	(26)	59	229
Chester borough	Morris	2	(2)	0	2	0	(5)	11	46
Chester township	Morris	2	(6)	0	0	(6)	(7)	27	51
Denville township	Morris	2	(35)	1	12	(22)	(21)	42	200
Dover town	Morris	2	(8)	14	3	9	(24)	269	0
East Hanover township	Morris	2	(37)	2	4	(31)	(14)	37	122
Florham Park borough	Morris	2	(46)	2	28	(16)	(50)	75	489
Hanover township	Morris	2	(24)	2	5	(17)	(16)	29	150
Harding township	Morris	2	(17)	0	0	(17)	(9)	0	100
Jefferson township	Morris	2	(41)	2	39	0	(13)	66	87
Kinnelon borough	Morris	2	(8)	1	0	(7)	(6)	0	64
Lincoln Park borough	Morris	2	(6)	4	9	7	(6)	8	65
Long Hill township	Morris	2	(13)	1	6	(6)	(4)	14	35
Madison borough	Morris	2	(46)	7	1	(38)	(9)	5	93
Mendham borough	Morris	2	(6)	2	0	(4)	(4)	10	37
Mendham township	Morris	2	(10)	0	0	(10)	(8)	22	67
Mine Hill township	Morris	2	(12)	0	(3)	(15)	(8)	0	94
Montville township	Morris	2	(39)	2	0	(37)	(15)	16	155

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Morris township	Morris	2	(23)	3	3	(17)	(34)	27	361
Morris Plains borough	Morris	2	(7)	1	0	(6)	(7)	35	50
Morristown town	Morris	2	(19)	16	(13)	(16)	(20)	128	101
Mountain Lakes borough	Morris	2	(12)	0	0	(12)	(5)	1	57
Mount Arlington borough	Morris	2	(9)	2	25	18	(4)	15	33
Mount Olive township	Morris	2	(16)	9	(11)	(18)	(35)	141	252
Netcong borough	Morris	2	(3)	2	1	0	(2)	20	7
Parsippany-Troy Hills twp	Morris	2	(78)	8	61	(9)	(53)	173	425
Pequannock township	Morris	2	(38)	2	(13)	(49)	(16)	76	104
Randolph township	Morris	2	(25)	4	0	(21)	(19)	30	180
Riverdale borough	Morris	2	(6)	1	11	6	(9)	2	104
Rockaway borough	Morris	2	(3)	3	(6)	(6)	(7)	15	64
Rockaway township	Morris	2	(28)	3	7	(18)	(24)	24	246
Roxbury township	Morris	2	(26)	4	6	(16)	(18)	26	180
Victory Gardens borough	Morris	2	0	1	45	46	0	0	0
Washington township	Morris	2	(4)	1	3	0	(7)	9	72
Wharton borough	Morris	2	(15)	4	9	(2)	(14)	97	63
Berkeley Heights township	Union	2	(23)	3	0	(20)	(20)	10	216
Clark township	Union	2	(17)	4	6	(7)	(9)	38	63
Cranford township	Union	2	(10)	15	1	6	(15)	97	71
Elizabeth city	Union	2	(435)	349	3,245	3,159	(223)	2,524	0
Fanwood borough	Union	2	(8)	0	0	(8)	(5)	16	35
Garwood borough	Union	2	(2)	10	0	8	(4)	41	7
Hillside township	Union	2	(19)	37	120	138	(12)	138	0
Kenilworth borough	Union	2	(16)	7	2	(7)	(4)	0	49
Linden city	Union	2	(57)	86	106	135	(40)	454	0
Mountainside borough	Union	2	(15)	1	0	(14)	(17)	138	53
New Providence borough	Union	2	(10)	11	0	1	(11)	65	62
Plainfield city	Union	2	(39)	75	397	433	(45)	512	0
Rahway city	Union	2	(65)	38	(82)	(109)	(18)	115	91
Roselle borough	Union	2	(3)	34	238	269	0	0	0
Roselle Park borough	Union	2	(9)	19	(44)	(34)	(11)	84	39
Scotch Plains township	Union	2	(81)	8	1	(72)	(21)	101	131
Springfield township	Union	2	(8)	14	5	11	(4)	0	49
Summit city	Union	2	(45)	17	2	(26)	(31)	172	184
Union township	Union	2	(10)	61	40	91	(40)	422	26
Westfield town	Union	2	(134)	17	1	(116)	(25)	76	203
Winfield township	Union	2	0	5	(7)	(2)	(3)	22	15
Allamuchy township	Warren	2	(1)	1	9	9	(9)	63	39
Alpha borough	Warren	2	0	2	3	5	(4)	13	34
Belvidere town	Warren	2	(1)	3	5	7	(1)	8	0
Blairstown township	Warren	2	(6)	1	5	0	(1)	0	16
Franklin township	Warren	2	(3)	0	3	0	(2)	0	25

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Frelinghuysen township	Warren	2	(1)	0	2	1	(5)	0	57
Greenwich township	Warren	2	(4)	2	0	(2)	(8)	0	87
Hackettstown town	Warren	2	(3)	8	4	9	(14)	135	18
Hardwick township	Warren	2	0	0	1	1	(2)	2	16
Harmony township	Warren	2	(13)	0	(2)	(15)	(3)	0	28
Hope township	Warren	2	(1)	0	0	(1)	(2)	3	17
Independence township	Warren	2	(2)	1	7	6	(1)	0	10
Knowlton township	Warren	2	(4)	0	1	(3)	(3)	17	11
Liberty township	Warren	2	(13)	0	1	(12)	(3)	0	33
Lopatcong township	Warren	2	(2)	2	34	34	(4)	0	41
Mansfield township	Warren	2	(8)	5	30	27	(5)	22	31
Oxford township	Warren	2	(1)	1	4	4	(5)	26	28
Phillipsburg town	Warren	2	(14)	21	364	371	0	0	0
Pohatcong township	Warren	2	(7)	1	(2)	(8)	(9)	8	88
Washington borough	Warren	2	(4)	9	(9)	(4)	(2)	13	11
Washington township	Warren	2	(6)	0	5	(1)	(7)	7	78
White township	Warren	2	(16)	1	15	0	(12)	85	47
Alexandria township	Hunterdon	3	(4)	2	5	3	(6)	37	23
Bethlehem township	Hunterdon	3	(5)	0	(3)	(8)	(5)	4	38
Bloomsbury borough	Hunterdon	3	0	1	(1)	0	(5)	3	39
Califon borough	Hunterdon	3	(1)	0	(2)	(3)	(3)	0	23
Clinton town	Hunterdon	3	0	6	8	14	(4)	23	13
Clinton township	Hunterdon	3	(10)	10	7	7	(19)	20	162
Delaware township	Hunterdon	3	(4)	3	5	4	(5)	27	15
East Amwell township	Hunterdon	3	(4)	1	4	1	(3)	2	22
Flemington borough	Hunterdon	3	(2)	26	5	29	(8)	72	0
Franklin township	Hunterdon	3	(3)	2	4	3	(1)	0	10
Frenchtown borough	Hunterdon	3	(1)	6	4	9	0	0	5
Glen Gardner borough	Hunterdon	3	(2)	5	(2)	1	(1)	8	5
Hampton borough	Hunterdon	3	(2)	4	(1)	1	(3)	19	7
High Bridge borough	Hunterdon	3	(2)	5	7	10	(7)	57	8
Holland township	Hunterdon	3	(2)	3	7	8	(11)	103	0
Kingwood township	Hunterdon	3	(5)	4	5	4	(2)	5	18
Lambertville city	Hunterdon	3	(10)	19	4	13	(8)	75	0
Lebanon borough	Hunterdon	3	(2)	5	(6)	(3)	(4)	5	33
Lebanon township	Hunterdon	3	(7)	4	4	1	(2)	0	21
Milford borough	Hunterdon	3	(1)	3	2	4	(1)	0	8
Raritan township	Hunterdon	3	(24)	7	49	32	(16)	28	123
Readington township	Hunterdon	3	(24)	6	12	(6)	(45)	136	281
Stockton borough	Hunterdon	3	(1)	2	1	2	(1)	0	8
Tewksbury township	Hunterdon	3	(5)	1	0	(4)	(7)	0	61
Union township	Hunterdon	3	(6)	3	(4)	(7)	(6)	1	52
West Amwell township	Hunterdon	3	(7)	2	4	(1)	(2)	0	18

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Carteret borough	Middlesex	3	(19)	98	23	102	0	1	0
Cranbury township	Middlesex	3	(10)	5	0	(5)	(9)	3	79
Dunellen borough	Middlesex	3	(11)	38	(35)	(8)	(2)	0	18
East Brunswick township	Middlesex	3	(4)	29	54	79	(20)	98	85
Edison township	Middlesex	3	(104)	127	62	85	(88)	652	171
Helmetta borough	Middlesex	3	0	0	8	8	(1)	6	1
Highland Park borough	Middlesex	3	(12)	96	14	98	0	1	0
Jamesburg borough	Middlesex	3	(8)	26	5	23	(5)	35	16
Metuchen borough	Middlesex	3	(41)	27	5	(9)	(16)	80	70
Middlesex borough	Middlesex	3	(22)	22	(1)	(1)	(10)	70	22
Milltown borough	Middlesex	3	(1)	24	(5)	18	(4)	36	2
Monroe township	Middlesex	3	(17)	47	88	118	(37)	126	221
New Brunswick city	Middlesex	3	(166)	262	1,314	1,410	(4)	40	0
North Brunswick township	Middlesex	3	(20)	86	90	156	(21)	195	0
Old Bridge township	Middlesex	3	(37)	123	189	275	(12)	109	0
Perth Amboy city	Middlesex	3	(35)	361	1,225	1,551	0	0	0
Piscataway township	Middlesex	3	(32)	92	34	94	(38)	309	49
Plainsboro township	Middlesex	3	(6)	52	29	75	(11)	5	98
Sayreville borough	Middlesex	3	(21)	57	289	325	0	0	0
South Amboy city	Middlesex	3	(7)	34	32	59	0	0	0
South Brunswick township	Middlesex	3	(25)	44	17	36	(37)	148	198
South Plainfield borough	Middlesex	3	(23)	23	61	61	(14)	51	75
South River borough	Middlesex	3	(8)	58	0	50	(13)	122	0
Spotswood borough	Middlesex	3	(5)	9	10	14	(2)	11	3
Woodbridge township	Middlesex	3	(85)	154	132	201	(49)	394	62
Bedminster township	Somerset	3	(7)	11	0	4	(7)	1	63
Bernards township	Somerset	3	(37)	18	3	(16)	(50)	51	418
Bernardsville borough	Somerset	3	(21)	9	6	(6)	(5)	0	45
Bound Brook borough	Somerset	3	(8)	47	(37)	2	(8)	76	3
Branchburg township	Somerset	3	(13)	4	7	(2)	(20)	6	177
Bridgewater township	Somerset	3	(53)	30	9	(14)	(41)	183	196
Far Hills borough	Somerset	3	0	1	2	3	(2)	2	16
Franklin township	Somerset	3	(62)	73	112	123	(32)	95	206
Green Brook township	Somerset	3	(5)	2	0	(3)	(10)	12	80
Hillsborough township	Somerset	3	(10)	14	38	42	(40)	88	282
Manville borough	Somerset	3	(21)	41	48	68	(15)	136	0
Millstone borough	Somerset	3	(1)	0	1	0	(1)	0	12
Montgomery township	Somerset	3	(22)	5	0	(17)	(32)	97	198
North Plainfield borough	Somerset	3	(2)	70	19	87	(29)	275	0
Peapack & Gladstone bor.	Somerset	3	(5)	4	0	(1)	(9)	0	82
Raritan borough	Somerset	3	(4)	32	12	40	(4)	34	0
Rocky Hill borough	Somerset	3	(1)	1	0	0	(1)	2	12
Somerville borough	Somerset	3	(5)	47	9	51	(11)	102	0

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South Bound Brook borough	Somerset	3	(4)	15	(15)	(4)	(10)	93	2
Warren township	Somerset	3	(33)	2	3	(28)	(26)	86	153
Watchung borough	Somerset	3	(22)	1	9	(12)	(12)	29	78
East Windsor township	Mercer	4	(9)	23	(48)	(34)	(24)	57	122
Ewing township	Mercer	4	(14)	38	(63)	(39)	(54)	101	303
Hamilton township	Mercer	4	(68)	121	(124)	(71)	(96)	429	283
Hightstown borough	Mercer	4	(7)	12	(19)	(14)	(8)	35	21
Hopewell borough	Mercer	4	(6)	4	(1)	(3)	(3)	15	11
Hopewell township	Mercer	4	(18)	8	0	(10)	(35)	0	260
Lawrence township	Mercer	4	(16)	30	(29)	(15)	(21)	48	108
Pennington borough	Mercer	4	(2)	3	0	1	(10)	68	6
Princeton	Mercer	4	(65)	55	(147)	(157)	(53)	86	306
Robbinsville township	Mercer	4	(11)	2	(1)	(10)	(17)	20	102
Trenton city	Mercer	4	(215)	280	985	1,050	0	0	0
West Windsor township	Mercer	4	(22)	15	(1)	(8)	(35)	127	129
Aberdeen township	Monmouth	4	(24)	10	(29)	(43)	(21)	101	56
Allenhurst borough	Monmouth	4	(6)	2	(1)	(5)	(2)	4	11
Allentown borough	Monmouth	4	(1)	2	(1)	0	(2)	10	9
Asbury Park city	Monmouth	4	(49)	64	171	186	(12)	91	0
Atlantic Highlands borough	Monmouth	4	(3)	5	(3)	(1)	(12)	84	2
Avon-by-the-Sea borough	Monmouth	4	(33)	6	(9)	(36)	(5)	0	38
Belmar borough	Monmouth	4	(59)	25	(32)	(66)	(16)	62	60
Bradley Beach borough	Monmouth	4	(23)	25	(91)	(89)	(14)	21	85
Brielle borough	Monmouth	4	(34)	7	0	(27)	(7)	12	43
Colts Neck township	Monmouth	4	(21)	5	(5)	(21)	(8)	18	45
Deal borough	Monmouth	4	(17)	1	(1)	(17)	(3)	2	23
Eatontown borough	Monmouth	4	(28)	31	(12)	(9)	(24)	135	42
Englishtown borough	Monmouth	4	(2)	3	0	1	(5)	37	3
Fair Haven borough	Monmouth	4	(35)	1	0	(34)	(7)	0	48
Farmingdale borough	Monmouth	4	(2)	2	(1)	(1)	(1)	2	6
Freehold borough	Monmouth	4	(2)	16	(32)	(18)	(40)	299	0
Freehold township	Monmouth	4	(9)	12	3	6	(32)	110	128
Hazlet township	Monmouth	4	(17)	3	(26)	(40)	(12)	28	62
Highlands borough	Monmouth	4	(23)	12	(88)	(99)	(20)	62	88
Holmdel township	Monmouth	4	(9)	1	(1)	(9)	(13)	49	47
Howell township	Monmouth	4	(38)	14	(21)	(45)	(31)	85	147
Interlaken borough	Monmouth	4	(1)	0	0	(1)	(2)	4	12
Keansburg borough	Monmouth	4	(35)	20	113	98	(7)	54	0
Keyport borough	Monmouth	4	(12)	17	74	79	0	0	0
Lake Como borough	Monmouth	4	(23)	4	(9)	(28)	(4)	3	29
Little Silver borough	Monmouth	4	(19)	0	0	(19)	(6)	10	37
Loch Arbour village	Monmouth	4	(2)	0	(1)	(3)	(2)	0	11
Long Branch city	Monmouth	4	(54)	90	163	199	(18)	134	0

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Manalapan township	Monmouth	4	(25)	12	16	3	(24)	123	57
Manasquan borough	Monmouth	4	(100)	17	(13)	(96)	(14)	3	97
Marlboro township	Monmouth	4	(26)	8	(7)	(25)	(37)	134	141
Matawan borough	Monmouth	4	(6)	9	(45)	(42)	(17)	79	44
Middletown township	Monmouth	4	(106)	23	(23)	(106)	(55)	212	200
Millstone township	Monmouth	4	(20)	0	0	(20)	(11)	36	46
Monmouth Beach borough	Monmouth	4	(25)	2	(23)	(46)	(7)	0	50
Neptune township	Monmouth	4	(34)	43	111	120	(6)	44	0
Neptune City borough	Monmouth	4	(6)	8	(46)	(44)	(10)	13	64
Ocean township	Monmouth	4	(30)	22	66	58	(11)	80	0
Oceanport borough	Monmouth	4	(15)	4	(3)	(14)	(6)	0	48
Red Bank borough	Monmouth	4	(20)	44	(80)	(56)	(28)	138	66
Roosevelt borough	Monmouth	4	(2)	1	0	(1)	(2)	6	5
Rumson borough	Monmouth	4	(102)	1	0	(101)	(20)	33	114
Sea Bright borough	Monmouth	4	(10)	6	(2)	(6)	(3)	13	12
Sea Girt borough	Monmouth	4	(57)	1	0	(56)	(9)	0	68
Shrewsbury borough	Monmouth	4	(4)	0	(12)	(16)	(6)	10	38
Shrewsbury township	Monmouth	4	(10)	2	(5)	(13)	(7)	32	21
Spring Lake borough	Monmouth	4	(65)	2	(18)	(81)	(14)	24	83
Spring Lake Heights bor.	Monmouth	4	(33)	9	(35)	(59)	(11)	25	57
Tinton Falls borough	Monmouth	4	(21)	5	(1)	(17)	(30)	120	104
Union Beach borough	Monmouth	4	(25)	5	(3)	(23)	(12)	64	29
Upper Freehold township	Monmouth	4	(13)	0	0	(13)	(10)	52	26
Wall township	Monmouth	4	(78)	14	(20)	(84)	(46)	140	200
West Long Branch borough	Monmouth	4	(10)	7	(3)	(6)	(5)	14	26
Barnegat township	Ocean	4	(13)	7	(16)	(22)	(19)	63	78
Barnegat Light borough	Ocean	4	(6)	8	(18)	(16)	(5)	14	19
Bay Head borough	Ocean	4	(15)	2	0	(13)	(3)	1	18
Beach Haven borough	Ocean	4	(66)	31	(9)	(44)	(7)	3	47
Beachwood borough	Ocean	4	(18)	4	(15)	(29)	(5)	4	37
Berkeley township	Ocean	4	(76)	15	378	317	0	0	0
Brick township	Ocean	4	(226)	39	(43)	(230)	(87)	332	316
Eagleswood township	Ocean	4	(6)	1	0	(5)	(4)	0	30
Harvey Cedars borough	Ocean	4	(9)	8	(7)	(8)	(2)	3	14
Island Heights borough	Ocean	4	(8)	1	0	(7)	(2)	3	13
Jackson township	Ocean	4	(17)	20	57	60	(27)	60	139
Lacey township	Ocean	4	(66)	5	32	(29)	(21)	80	73
Lakehurst borough	Ocean	4	(1)	5	0	4	(3)	19	0
Lakewood township	Ocean	4	(228)	123	1,502	1,397	0	0	0
Lavallette borough	Ocean	4	(81)	34	(22)	(69)	(9)	0	66
Little Egg Harbor township	Ocean	4	(99)	14	27	(58)	(38)	188	98
Long Beach township	Ocean	4	(198)	84	(34)	(148)	(21)	16	140
Manchester township	Ocean	4	(54)	136	534	616	0	0	0

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Mantoloking borough	Ocean	4	(18)	0	0	(18)	(4)	0	28
Ocean township	Ocean	4	(37)	1	(4)	(40)	(12)	8	79
Ocean Gate borough	Ocean	4	(7)	4	(9)	(12)	(3)	11	14
Pine Beach borough	Ocean	4	(1)	0	(4)	(5)	(2)	4	12
Plumsted township	Ocean	4	(11)	7	32	28	0	3	0
Point Pleasant borough	Ocean	4	(99)	26	(67)	(140)	(21)	11	145
Point Pleasant Beach bor.	Ocean	4	(68)	27	(69)	(110)	(20)	36	116
Seaside Heights borough	Ocean	4	(56)	68	75	87	(8)	60	0
Seaside Park borough	Ocean	4	(54)	25	34	5	(4)	27	0
Ship Bottom borough	Ocean	4	(63)	27	(13)	(49)	(6)	0	48
South Toms River borough	Ocean	4	(1)	1	0	0	(4)	29	3
Stafford township	Ocean	4	(136)	11	7	(118)	(41)	161	146
Surf City borough	Ocean	4	(55)	26	(11)	(40)	(6)	3	41
Toms River township	Ocean	4	(486)	48	(82)	(520)	(122)	308	600
Tuckerton borough	Ocean	4	(12)	3	(3)	(12)	(8)	32	26
Bass River township	Burlington	5	(4)	0	1	(3)	(1)	0	8
Beverly city	Burlington	5	(5)	0	(2)	(7)	(2)	0	10
Bordentown city	Burlington	5	(8)	1	(6)	(13)	(7)	27	21
Bordentown township	Burlington	5	(6)	1	21	16	(5)	2	30
Burlington city	Burlington	5	(20)	1	22	3	(3)	4	13
Burlington township	Burlington	5	(6)	1	11	6	(21)	15	129
Chesterfield township	Burlington	5	(20)	0	0	(20)	(8)	18	37
Cinnaminson township	Burlington	5	(13)	0	22	9	(7)	6	43
Delanco township	Burlington	5	(3)	0	19	16	(1)	0	6
Delran township	Burlington	5	(8)	1	13	6	(14)	12	83
Eastampton township	Burlington	5	(8)	0	3	(5)	(9)	0	64
Edgewater Park township	Burlington	5	(1)	1	(6)	(6)	(11)	30	48
Evesham township	Burlington	5	(13)	1	21	9	(45)	66	244
Fieldsboro borough	Burlington	5	(2)	0	2	0	(1)	0	5
Florence township	Burlington	5	(18)	1	27	10	(12)	55	30
Hainesport township	Burlington	5	(9)	0	19	10	(6)	0	43
Lumberton township	Burlington	5	(5)	0	4	(1)	(16)	0	111
Mansfield township	Burlington	5	(11)	0	3	(8)	(9)	0	65
Maple Shade township	Burlington	5	(25)	3	115	93	0	0	0
Medford township	Burlington	5	(6)	0	0	(6)	(15)	14	90
Medford Lakes borough	Burlington	5	(6)	0	2	(4)	(3)	0	20
Moorestown township	Burlington	5	(29)	1	5	(23)	(30)	25	177
Mount Holly township	Burlington	5	(93)	2	(19)	(110)	(18)	2	125
Mount Laurel township	Burlington	5	(26)	2	12	(12)	(41)	39	240
New Hanover township	Burlington	5	(1)	0	0	(1)	(6)	0	44
North Hanover township	Burlington	5	(15)	0	5	(10)	(3)	0	17
Palmyra borough	Burlington	5	(5)	1	97	93	0	0	0
Pemberton borough	Burlington	5	(4)	0	2	(2)	(1)	0	7

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Pemberton township	Burlington	5	(34)	1	18	(15)	(7)	0	50
Riverside township	Burlington	5	(5)	1	72	68	0	0	0
Riverton borough	Burlington	5	(1)	0	3	2	(2)	0	15
Shamong township	Burlington	5	(4)	0	2	(2)	(6)	19	19
Southampton township	Burlington	5	(25)	0	20	(5)	(5)	20	18
Springfield township	Burlington	5	(3)	0	1	(2)	(5)	3	34
Tabernacle township	Burlington	5	(6)	0	3	(3)	(4)	0	29
Washington township	Burlington	5	(6)	0	1	(5)	(2)	1	11
Westampton township	Burlington	5	(8)	0	19	11	(15)	16	90
Willingboro township	Burlington	5	(9)	0	4	(5)	(14)	59	37
Woodland township	Burlington	5	(4)	0	0	(4)	(4)	1	30
Wrightstown borough	Burlington	5	(2)	0	(1)	(3)	(2)	1	15
Audubon borough	Camden	5	(3)	2	(9)	(10)	(13)	71	15
Audubon Park borough	Camden	5	0	0	(5)	(5)	(2)	0	10
Barrington borough	Camden	5	(29)	1	(7)	(35)	(9)	24	40
Bellmawr borough	Camden	5	(8)	1	152	145	0	0	0
Berlin borough	Camden	5	(6)	1	18	13	(10)	57	13
Berlin township	Camden	5	(24)	1	4	(19)	(16)	50	57
Brooklawn borough	Camden	5	0	0	(10)	(10)	(3)	1	19
Camden city	Camden	5	(689)	16	1,592	919	0	0	0
Cherry Hill township	Camden	5	(46)	4	15	(27)	(108)	402	334
Chesilhurst borough	Camden	5	(11)	0	1	(10)	(4)	11	16
Clementon borough	Camden	5	(6)	1	106	101	0	0	0
Collingswood borough	Camden	5	(12)	5	57	50	(4)	31	0
Gibbsboro borough	Camden	5	(3)	0	2	(1)	(7)	29	17
Gloucester township	Camden	5	(8)	6	(11)	(13)	(47)	138	186
Gloucester City	Camden	5	(39)	2	(24)	(61)	(20)	96	41
Haddon township	Camden	5	(12)	2	(2)	(12)	(13)	55	35
Haddonfield borough	Camden	5	(18)	1	(19)	(36)	(13)	11	79
Haddon Heights borough	Camden	5	(5)	1	(16)	(20)	(9)	24	34
Hi-Nella borough	Camden	5	0	0	(1)	(1)	(1)	7	1
Laurel Springs borough	Camden	5	0	0	(8)	(8)	(3)	4	17
Lawnside borough	Camden	5	(10)	0	1	(9)	(3)	0	23
Lindenwold borough	Camden	5	(12)	3	493	484	0	0	0
Magnolia borough	Camden	5	(8)	0	(4)	(12)	(6)	19	19
Merchantville borough	Camden	5	0	2	(28)	(26)	(4)	0	29
Mount Ephraim borough	Camden	5	(9)	0	(24)	(33)	(6)	2	38
Oaklyn borough	Camden	5	0	1	(2)	(1)	(5)	14	19
Pennsauken township	Camden	5	(27)	5	223	201	0	0	0
Pine Hill borough	Camden	5	(13)	1	72	60	0	0	0
Pine Valley borough	Camden	5	(2)	0	0	(2)	(1)	0	10
Runnemede borough	Camden	5	(5)	1	71	67	0	0	0
Somerdale borough	Camden	5	(3)	1	52	50	0	0	0

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Stratford borough	Camden	5	(13)	1	(6)	(18)	(6)	19	26
Tavistock borough	Camden	5	0	0	0	0	(1)	0	3
Voorhees township	Camden	5	(17)	2	77	62	(49)	306	26
Waterford township	Camden	5	(11)	0	8	(3)	(4)	0	24
Winslow township	Camden	5	(83)	2	109	28	(23)	66	89
Woodlynne borough	Camden	5	0	1	81	82	0	0	0
Clayton borough	Gloucester	5	(15)	1	(3)	(17)	(11)	38	35
Deptford township	Gloucester	5	(49)	2	60	13	(26)	79	96
East Greenwich township	Gloucester	5	(3)	1	24	22	(13)	48	41
Elk township	Gloucester	5	(3)	0	2	(1)	(9)	4	56
Franklin township	Gloucester	5	(36)	1	17	(18)	(18)	45	77
Glassboro borough	Gloucester	5	(59)	1	142	84	(4)	10	18
Greenwich township	Gloucester	5	(5)	0	3	(2)	(4)	0	30
Harrison township	Gloucester	5	(24)	0	23	(1)	(14)	0	98
Logan township	Gloucester	5	(6)	0	3	(3)	(22)	0	151
Mantua township	Gloucester	5	(9)	0	7	(2)	(19)	52	79
Monroe township	Gloucester	5	(45)	1	75	31	(21)	81	64
National Park borough	Gloucester	5	(3)	0	3	0	(2)	6	5
Newfield borough	Gloucester	5	0	0	1	1	(1)	3	4
Paulsboro borough	Gloucester	5	(11)	2	101	92	(2)	14	0
Pitman borough	Gloucester	5	(3)	1	(2)	(4)	(7)	33	15
South Harrison township	Gloucester	5	(4)	0	0	(4)	(3)	0	21
Swedesboro borough	Gloucester	5	(3)	0	(2)	(5)	(5)	19	18
Washington township	Gloucester	5	(19)	2	13	(4)	(45)	158	148
Wenonah borough	Gloucester	5	(2)	0	1	(1)	(2)	0	16
West Deptford township	Gloucester	5	(12)	1	47	36	(10)	12	59
Westville borough	Gloucester	5	(2)	1	(3)	(4)	(2)	0	12
Woodbury city	Gloucester	5	(12)	2	86	76	0	0	0
Woodbury Heights borough	Gloucester	5	0	0	1	1	(4)	8	17
Woolwich township	Gloucester	5	(3)	0	0	(3)	(11)	0	79
Absecon city	Atlantic	6	(4)	5	4	5	(1)	32	0
Atlantic City	Atlantic	6	(231)	117	641	527	0	0	0
Brigantine city	Atlantic	6	(169)	47	(46)	(168)	(7)	30	161
Buena borough	Atlantic	6	(17)	10	49	42	0	0	0
Buena Vista township	Atlantic	6	(8)	7	(14)	(15)	(3)	52	12
Corbin City	Atlantic	6	(8)	0	0	(8)	0	1	8
Egg Harbor township	Atlantic	6	(120)	18	(10)	(112)	(7)	75	105
Egg Harbor City	Atlantic	6	(3)	10	34	41	0	0	0
Estell Manor city	Atlantic	6	(4)	0	0	(4)	0	0	4
Folsom borough	Atlantic	6	(3)	0	(1)	(4)	0	1	4
Galloway township	Atlantic	6	(65)	21	(58)	(102)	(9)	138	93
Hamilton township	Atlantic	6	(22)	17	(46)	(51)	(5)	90	46
Hammonton town	Atlantic	6	(21)	22	(16)	(15)	(7)	172	8

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Linwood city	Atlantic	6	(17)	2	(4)	(19)	(1)	1	18
Longport borough	Atlantic	6	(51)	3	0	(48)	(2)	2	46
Margate City	Atlantic	6	(144)	23	(157)	(278)	(12)	40	266
Mullica township	Atlantic	6	(15)	1	(5)	(19)	(1)	0	18
Northfield city	Atlantic	6	(10)	2	(3)	(11)	(1)	3	10
Pleasantville city	Atlantic	6	(38)	22	68	52	(6)	144	0
Port Republic city	Atlantic	6	(1)	0	(2)	(3)	0	0	3
Somers Point city	Atlantic	6	(12)	16	37	41	0	0	0
Ventnor City	Atlantic	6	(8)	44	(41)	(5)	(1)	12	4
Weymouth township	Atlantic	6	(4)	2	0	(2)	0	5	2
Avalon borough	Cape May	6	(313)	19	(31)	(325)	(12)	0	313
Cape May city	Cape May	6	(29)	26	(26)	(29)	(1)	3	28
Cape May Point borough	Cape May	6	(13)	1	(6)	(18)	(1)	0	17
Dennis township	Cape May	6	(15)	0	(6)	(21)	(2)	39	19
Lower township	Cape May	6	(85)	12	(13)	(86)	(4)	24	82
Middle township	Cape May	6	(66)	18	32	(16)	(2)	33	14
North Wildwood city	Cape May	6	(109)	73	0	(36)	(2)	12	34
Ocean City	Cape May	6	(915)	130	(98)	(883)	(34)	32	849
Sea Isle City	Cape May	6	(356)	38	(83)	(401)	(15)	0	386
Stone Harbor borough	Cape May	6	(116)	15	(14)	(115)	(4)	0	111
Upper township	Cape May	6	(17)	2	(16)	(31)	(1)	6	30
West Cape May borough	Cape May	6	(12)	3	(4)	(13)	0	0	13
West Wildwood borough	Cape May	6	(18)	5	8	(5)	0	1	5
Wildwood city	Cape May	6	(117)	82	73	38	0	0	0
Wildwood Crest borough	Cape May	6	(71)	37	(147)	(181)	(8)	21	173
Woodbine borough	Cape May	6	(4)	1	5	2	0	0	0
Bridgeton city	Cumberland	6	(59)	44	157	142	(7)	193	0
Commercial township	Cumberland	6	(22)	1	51	30	0	0	0
Deerfield township	Cumberland	6	(12)	1	(2)	(13)	0	0	13
Downe township	Cumberland	6	(17)	0	19	2	0	10	0
Fairfield township	Cumberland	6	(13)	2	28	17	0	12	0
Greenwich township	Cumberland	6	(3)	1	(1)	(3)	0	0	3
Hopewell township	Cumberland	6	(4)	2	(3)	(5)	0	0	5
Lawrence township	Cumberland	6	0	1	(5)	(4)	0	5	4
Maurice River township	Cumberland	6	(17)	2	(3)	(18)	(1)	6	17
Millville city	Cumberland	6	(88)	46	19	(23)	(6)	138	17
Shiloh borough	Cumberland	6	(1)	1	0	0	0	3	0
Stow Creek township	Cumberland	6	(2)	0	(1)	(3)	0	0	3
Upper Deerfield township	Cumberland	6	(36)	8	(13)	(41)	(3)	29	38
Vineland city	Cumberland	6	(123)	94	(7)	(36)	(12)	294	24
Alloway township	Salem	6	(1)	1	1	1	0	0	0
Carneys Point township	Salem	6	(15)	4	(10)	(21)	(2)	22	19
Elmer borough	Salem	6	(1)	2	(2)	(1)	0	0	1

	County	Reg.	LMI Demo-litions	LMI Conver-sions	Net Filtering	Secondary Sources Net	Remaining Secondary Source Allocation	Adjusted Present Need	Adjusted Prospective Need
Elsinboro township	Salem	6	(5)	1	(2)	(6)	0	7	6
Lower Alloways Creek twp	Salem	6	(3)	1	(5)	(7)	0	3	7
Mannington township	Salem	6	(6)	0	(1)	(7)	0	2	7
Oldmans township	Salem	6	(5)	2	(2)	(5)	0	0	5
Penns Grove borough	Salem	6	(2)	12	68	78	0	0	0
Pennsville township	Salem	6	(21)	15	(30)	(36)	(2)	26	34
Pilesgrove township	Salem	6	(13)	0	2	(11)	(1)	8	10
Pittsgrove township	Salem	6	(17)	1	(7)	(23)	(2)	20	21
Quinton township	Salem	6	(5)	1	(2)	(6)	0	0	6
Salem city	Salem	6	(53)	15	44	6	0	11	0
Upper Pittsgrove township	Salem	6	(18)	0	(3)	(21)	(1)	8	20
Woodstown borough	Salem	6	(7)	6	(8)	(9)	0	0	9

APPENDIX D: ALLOCATION CAP ADJUSTMENTS TO MUNICIPAL OBLIGATIONS

TABLE D.1: ALLOCATION CAP ADJUSTMENTS TO MUNICIPAL OBLIGATIONS

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Allendale borough	Bergen	1	22	78	2,111	0	0	22	78
Alpine borough	Bergen	1	4	113	634	0	0	4	113
Bergenfield borough	Bergen	1	177	33	9,152	0	0	177	33
Bogota borough	Bergen	1	89	0	2,692	0	0	89	0
Carlstadt borough	Bergen	1	38	50	2,220	0	0	38	50
Cliffside Park borough	Bergen	1	173	39	10,287	0	0	173	39
Closter borough	Bergen	1	0	127	2,767	0	0	0	127
Cresskill borough	Bergen	1	57	235	3,158	0	0	57	235
Demarest borough	Bergen	1	0	89	1,654	0	0	0	89
Dumont borough	Bergen	1	46	86	6,302	0	0	46	86
East Rutherford borough	Bergen	1	235	38	3,901	0	0	235	38
Edgewater borough	Bergen	1	0	284	5,564	0	0	0	284
Elmwood Park borough	Bergen	1	51	34	7,069	0	0	51	34
Emerson borough	Bergen	1	82	83	2,466	0	0	82	83
Englewood city	Bergen	1	445	154	10,369	0	0	445	154
Englewood Cliffs borough	Bergen	1	0	239	1,753	0	0	0	239
Fair Lawn borough	Bergen	1	202	209	12,045	0	0	202	209
Fairview borough	Bergen	1	194	0	4,992	0	0	194	0
Fort Lee borough	Bergen	1	315	84	16,744	0	0	315	84
Franklin Lakes borough	Bergen	1	41	293	3,581	0	0	41	293
Garfield city	Bergen	1	0	0	10,961	0	0	0	0
Glen Rock borough	Bergen	1	17	94	3,716	0	0	17	94
Hackensack city	Bergen	1	225	0	18,465	0	0	225	0
Harrington Park borough	Bergen	1	6	101	1,655	0	0	6	101
Hasbrouck Heights borough	Bergen	1	74	257	4,429	0	0	74	257
Haworth borough	Bergen	1	0	62	1,148	0	0	0	62
Hillsdale borough	Bergen	1	15	91	3,477	0	0	15	91
Ho-Ho-Kus borough	Bergen	1	11	79	1,361	0	0	11	79
Leonia borough	Bergen	1	83	101	3,312	0	0	83	101
Little Ferry borough	Bergen	1	176	6	4,049	0	0	176	6
Lodi borough	Bergen	1	0	0	9,269	0	0	0	0
Lyndhurst township	Bergen	1	237	0	8,288	0	0	237	0
Mahwah township	Bergen	1	83	273	9,721	0	0	83	273
Maywood borough	Bergen	1	33	38	3,632	0	0	33	38
Midland Park borough	Bergen	1	39	62	2,791	0	0	39	62
Montvale borough	Bergen	1	2	229	2,825	0	0	2	229
Moonachie borough	Bergen	1	35	50	1,080	0	0	35	50
New Milford borough	Bergen	1	46	44	6,121	0	0	46	44

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
North Arlington borough	Bergen	1	156	0	6,124	0	0	156	0
Northvale borough	Bergen	1	3	47	1,494	0	0	3	47
Norwood borough	Bergen	1	0	56	1,860	0	0	0	56
Oakland borough	Bergen	1	38	170	4,195	0	0	38	170
Old Tappan borough	Bergen	1	14	204	1,952	0	0	14	204
Oradell borough	Bergen	1	15	73	2,632	0	0	15	73
Palisades Park borough	Bergen	1	163	123	7,361	0	0	163	123
Paramus borough	Bergen	1	186	398	8,600	0	0	186	398
Park Ridge borough	Bergen	1	141	80	3,122	0	0	141	80
Ramsey borough	Bergen	1	59	147	5,505	0	0	59	147
Ridgefield borough	Bergen	1	167	27	4,115	0	0	167	27
Ridgefield Park village	Bergen	1	163	0	4,565	0	0	163	0
Ridgewood village	Bergen	1	14	228	8,370	0	0	14	228
River Edge borough	Bergen	1	46	94	3,992	0	0	46	94
River Vale township	Bergen	1	29	92	3,294	0	0	29	92
Rochelle Park township	Bergen	1	0	28	2,069	0	0	0	28
Rockleigh borough	Bergen	1	0	145	71	(131)	0	0	14
Rutherford borough	Bergen	1	195	130	6,722	0	0	195	130
Saddle Brook township	Bergen	1	43	68	5,195	0	0	43	68
Saddle River borough	Bergen	1	67	208	1,075	0	0	67	208
South Hackensack township	Bergen	1	72	29	932	0	0	72	29
Teaneck township	Bergen	1	121	639	13,113	0	0	121	639
Tenafly borough	Bergen	1	27	173	4,804	0	0	27	173
Teterboro borough	Bergen	1	0	78	33	(72)	0	0	6
Upper Saddle River borough	Bergen	1	8	255	2,606	0	0	8	255
Waldwick borough	Bergen	1	76	63	3,423	0	0	76	63
Wallington borough	Bergen	1	0	0	4,658	0	0	0	0
Washington township	Bergen	1	0	171	3,317	0	0	0	171
Westwood borough	Bergen	1	68	41	4,326	0	0	68	41
Woodcliff Lake borough	Bergen	1	22	199	2,086	0	0	22	199
Wood-Ridge borough	Bergen	1	0	33	3,117	0	0	0	33
Wyckoff township	Bergen	1	53	189	5,807	0	0	53	189
Bayonne city	Hudson	1	0	0	25,574	0	0	0	0
East Newark borough	Hudson	1	0	0	760	0	0	0	0
Guttenberg town	Hudson	1	0	0	4,636	0	0	0	0
Harrison town	Hudson	1	192	0	5,188	0	0	192	0
Hoboken city	Hudson	1	169	0	24,336	0	0	169	0
Jersey City	Hudson	1	1,740	0	96,727	0	0	1,740	0
Kearny town	Hudson	1	0	0	13,579	0	0	0	0
North Bergen township	Hudson	1	0	0	21,579	0	0	0	0
Secaucus town	Hudson	1	55	160	6,697	0	0	55	160
Union City	Hudson	1	471	0	22,419	0	0	471	0
Weehawken township	Hudson	1	69	0	5,910	0	0	69	0
West New York town	Hudson	1	57	0	18,796	0	0	57	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Bloomingdale borough	Passaic	1	53	58	2,738	0	0	53	58
Clifton city	Passaic	1	1,260	0	29,189	0	(260)	1,000	0
Haledon borough	Passaic	1	36	0	2,436	0	0	36	0
Hawthorne borough	Passaic	1	57	0	7,000	0	0	57	0
Little Falls township	Passaic	1	114	75	5,328	0	0	114	75
North Haledon borough	Passaic	1	0	91	2,966	0	0	0	91
Passaic city	Passaic	1	4,280	0	20,214	0	(3,280)	1,000	0
Paterson city	Passaic	1	543	0	43,862	0	0	543	0
Pompton Lakes borough	Passaic	1	50	61	3,995	0	0	50	61
Prospect Park borough	Passaic	1	0	0	1,690	0	0	0	0
Ringwood borough	Passaic	1	9	47	3,904	0	0	9	47
Totowa borough	Passaic	1	116	100	3,487	0	0	116	100
Wanaque borough	Passaic	1	69	123	4,031	0	0	69	123
Wayne township	Passaic	1	180	678	18,239	0	0	180	678
West Milford township	Passaic	1	54	36	9,365	0	0	54	36
Woodland Park borough	Passaic	1	210	38	4,373	0	0	210	38
Andover borough	Sussex	1	0	12	284	0	0	0	12
Andover township	Sussex	1	7	228	1,960	0	0	7	228
Branchville borough	Sussex	1	1	140	376	(65)	0	1	75
Byram township	Sussex	1	31	79	2,911	0	0	31	79
Frankford township	Sussex	1	35	42	2,024	0	0	35	42
Franklin borough	Sussex	1	24	8	2,031	0	0	24	8
Fredon township	Sussex	1	26	83	1,221	0	0	26	83
Green township	Sussex	1	0	40	1,182	0	0	0	40
Hamburg borough	Sussex	1	14	10	1,482	0	0	14	10
Hampton township	Sussex	1	8	21	2,022	0	0	8	21
Hardyston township	Sussex	1	23	364	3,411	0	0	23	364
Hopatcong borough	Sussex	1	60	82	5,686	0	0	60	82
Lafayette township	Sussex	1	0	68	897	0	0	0	68
Montague township	Sussex	1	0	38	1,537	0	0	0	38
Newton town	Sussex	1	117	0	3,268	0	0	117	0
Ogdensburg borough	Sussex	1	7	9	846	0	0	7	9
Sandyston township	Sussex	1	6	32	804	0	0	6	32
Sparta township	Sussex	1	35	235	6,668	0	0	35	235
Stanhope borough	Sussex	1	6	28	1,412	0	0	6	28
Stillwater township	Sussex	1	0	39	1,665	0	0	0	39
Sussex borough	Sussex	1	0	0	829	0	0	0	0
Vernon township	Sussex	1	48	246	8,369	0	0	48	246
Walpack township	Sussex	1	0	0	4	0	0	0	0
Wantage township	Sussex	1	5	19	3,962	0	0	5	19
Belleville township	Essex	2	1,001	0	12,886	0	(1)	1,000	0
Bloomfield township	Essex	2	480	0	17,787	0	0	480	0
Caldwell borough	Essex	2	21	4	3,451	0	0	21	4
Cedar Grove township	Essex	2	15	45	4,290	0	0	15	45

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
City of Orange township	Essex	2	843	0	11,138	0	0	843	0
East Orange city	Essex	2	0	0	25,126	0	0	0	0
Essex Fells borough	Essex	2	0	40	686	0	0	0	40
Fairfield township	Essex	2	70	107	2,529	0	0	70	107
Glen Ridge borough	Essex	2	28	39	2,439	0	0	28	39
Irvington township	Essex	2	0	0	20,188	0	0	0	0
Livingston township	Essex	2	21	195	9,655	0	0	21	195
Maplewood township	Essex	2	123	33	8,111	0	0	123	33
Millburn township	Essex	2	144	349	6,670	0	0	144	349
Montclair township	Essex	2	20	0	14,370	0	0	20	0
Newark city	Essex	2	0	0	92,668	0	0	0	0
North Caldwell borough	Essex	2	37	75	2,079	0	0	37	75
Nutley township	Essex	2	390	0	11,262	0	0	390	0
Roseland borough	Essex	2	0	64	2,450	0	0	0	64
S. Orange Village township	Essex	2	0	260	5,312	0	0	0	260
Verona township	Essex	2	0	54	5,253	0	0	0	54
West Caldwell township	Essex	2	54	73	3,809	0	0	54	73
West Orange township	Essex	2	427	31	15,878	0	0	427	31
Boonton town	Morris	2	38	19	3,178	0	0	38	19
Boonton township	Morris	2	25	38	1,506	0	0	25	38
Butler borough	Morris	2	30	34	2,840	0	0	30	34
Chatham borough	Morris	2	0	74	2,896	0	0	0	74
Chatham township	Morris	2	59	229	3,987	0	0	59	229
Chester borough	Morris	2	11	46	559	0	0	11	46
Chester township	Morris	2	27	51	2,472	0	0	27	51
Denville township	Morris	2	42	200	6,481	0	0	42	200
Dover town	Morris	2	269	0	5,418	0	0	269	0
East Hanover township	Morris	2	37	122	3,888	0	0	37	122
Florham Park borough	Morris	2	75	489	4,128	0	0	75	489
Hanover township	Morris	2	29	150	5,185	0	0	29	150
Harding township	Morris	2	0	100	1,432	0	0	0	100
Jefferson township	Morris	2	66	87	7,759	0	0	66	87
Kinnelon borough	Morris	2	0	64	3,622	0	0	0	64
Lincoln Park borough	Morris	2	8	65	3,976	0	0	8	65
Long Hill township	Morris	2	14	35	2,939	0	0	14	35
Madison borough	Morris	2	5	93	5,474	0	0	5	93
Mendham borough	Morris	2	10	37	1,656	0	0	10	37
Mendham township	Morris	2	22	67	1,985	0	0	22	67
Mine Hill township	Morris	2	0	94	1,220	0	0	0	94
Montville township	Morris	2	16	155	7,498	0	0	16	155
Morris township	Morris	2	27	361	8,295	0	0	27	361
Morris Plains borough	Morris	2	35	50	2,119	0	0	35	50
Morristown town	Morris	2	128	101	7,946	0	0	128	101
Mountain Lakes borough	Morris	2	1	57	1,245	0	0	1	57

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Mount Arlington borough	Morris	2	15	33	2,406	0	0	15	33
Mount Olive township	Morris	2	141	252	10,945	0	0	141	252
Netcong borough	Morris	2	20	7	1,491	0	0	20	7
Parsippany-Troy Hills twp	Morris	2	173	425	19,801	0	0	173	425
Pequannock township	Morris	2	76	104	6,264	0	0	76	104
Randolph township	Morris	2	30	180	9,065	0	0	30	180
Riverdale borough	Morris	2	2	104	1,747	0	0	2	104
Rockaway borough	Morris	2	15	64	2,570	0	0	15	64
Rockaway township	Morris	2	24	246	8,801	0	0	24	246
Roxbury township	Morris	2	26	180	8,064	0	0	26	180
Victory Gardens borough	Morris	2	0	0	555	0	0	0	0
Washington township	Morris	2	9	72	6,461	0	0	9	72
Wharton borough	Morris	2	97	63	2,184	0	0	97	63
Berkeley Heights township	Union	2	10	216	4,383	0	0	10	216
Clark township	Union	2	38	63	5,491	0	0	38	63
Cranford township	Union	2	97	71	8,625	0	0	97	71
Elizabeth city	Union	2	2,524	0	39,355	0	(1,524)	1,000	0
Fanwood borough	Union	2	16	35	2,540	0	0	16	35
Garwood borough	Union	2	41	7	1,621	0	0	41	7
Hillside township	Union	2	138	0	7,247	0	0	138	0
Kenilworth borough	Union	2	0	49	2,620	0	0	0	49
Linden city	Union	2	454	0	14,719	0	0	454	0
Mountainside borough	Union	2	138	53	2,420	0	0	138	53
New Providence borough	Union	2	65	62	4,431	0	0	65	62
Plainfield city	Union	2	512	0	14,533	0	0	512	0
Rahway city	Union	2	115	91	10,531	0	0	115	91
Roselle borough	Union	2	0	0	8,297	0	0	0	0
Roselle Park borough	Union	2	84	39	5,155	0	0	84	39
Scotch Plains township	Union	2	101	131	8,498	0	0	101	131
Springfield township	Union	2	0	49	6,936	0	0	0	49
Summit city	Union	2	172	184	7,711	0	0	172	184
Union township	Union	2	422	26	20,262	0	0	422	26
Westfield town	Union	2	76	203	10,118	0	0	76	203
Winfield township	Union	2	22	15	687	0	0	22	15
Allamuchy township	Warren	2	63	39	2,044	0	0	63	39
Alpha borough	Warren	2	13	34	996	0	0	13	34
Belvidere town	Warren	2	8	0	1,080	0	0	8	0
Blairstown township	Warren	2	0	16	2,148	0	0	0	16
Franklin township	Warren	2	0	25	1,102	0	0	0	25
Frelinghuysen township	Warren	2	0	57	800	0	0	0	57
Greenwich township	Warren	2	0	87	1,827	0	0	0	87
Hackettstown town	Warren	2	135	18	3,506	0	0	135	18
Hardwick township	Warren	2	2	16	588	0	0	2	16
Harmony township	Warren	2	0	28	972	0	0	0	28

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Hope township	Warren	2	3	17	663	0	0	3	17
Independence township	Warren	2	0	10	2,295	0	0	0	10
Knowlton township	Warren	2	17	11	1,125	0	0	17	11
Liberty township	Warren	2	0	33	1,047	0	0	0	33
Lopatcong township	Warren	2	0	41	3,077	0	0	0	41
Mansfield township	Warren	2	22	31	3,099	0	0	22	31
Oxford township	Warren	2	26	28	1,003	0	0	26	28
Phillipsburg town	Warren	2	0	0	5,821	0	0	0	0
Pohatcong township	Warren	2	8	88	1,216	0	0	8	88
Washington borough	Warren	2	13	11	2,506	0	0	13	11
Washington township	Warren	2	7	78	2,474	0	0	7	78
White township	Warren	2	85	47	2,164	0	0	85	47
Alexandria township	Hunterdon	3	37	23	1,664	0	0	37	23
Bethlehem township	Hunterdon	3	4	38	1,249	0	0	4	38
Bloomsbury borough	Hunterdon	3	3	39	294	0	0	3	39
Califon borough	Hunterdon	3	0	23	400	0	0	0	23
Clinton town	Hunterdon	3	23	13	1,012	0	0	23	13
Clinton township	Hunterdon	3	20	162	4,311	0	0	20	162
Delaware township	Hunterdon	3	27	15	1,870	0	0	27	15
East Amwell township	Hunterdon	3	2	22	1,432	0	0	2	22
Flemington borough	Hunterdon	3	72	0	1,839	0	0	72	0
Franklin township	Hunterdon	3	0	10	1,188	0	0	0	10
Frenchtown borough	Hunterdon	3	0	5	664	0	0	0	5
Glen Gardner borough	Hunterdon	3	8	5	723	0	0	8	5
Hampton borough	Hunterdon	3	19	7	489	0	0	19	7
High Bridge borough	Hunterdon	3	57	8	1,418	0	0	57	8
Holland township	Hunterdon	3	103	0	2,089	0	0	103	0
Kingwood township	Hunterdon	3	5	18	1,372	0	0	5	18
Lambertville city	Hunterdon	3	75	0	1,866	0	0	75	0
Lebanon borough	Hunterdon	3	5	33	649	0	0	5	33
Lebanon township	Hunterdon	3	0	21	2,257	0	0	0	21
Milford borough	Hunterdon	3	0	8	446	0	0	0	8
Raritan township	Hunterdon	3	28	123	8,337	0	0	28	123
Readington township	Hunterdon	3	136	281	6,032	0	0	136	281
Stockton borough	Hunterdon	3	0	8	205	0	0	0	8
Tewksbury township	Hunterdon	3	0	61	2,181	0	0	0	61
Union township	Hunterdon	3	1	52	1,856	0	0	1	52
West Amwell township	Hunterdon	3	0	18	1,072	0	0	0	18
Carteret borough	Middlesex	3	1	0	7,852	0	0	1	0
Cranbury township	Middlesex	3	3	79	1,250	0	0	3	79
Dunellen borough	Middlesex	3	0	18	2,613	0	0	0	18
East Brunswick township	Middlesex	3	98	85	16,821	0	0	98	85
Edison township	Middlesex	3	652	171	34,191	0	0	652	171
Helmetta borough	Middlesex	3	6	1	924	0	0	6	1

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Highland Park borough	Middlesex	3	1	0	5,683	0	0	1	0
Jamesburg borough	Middlesex	3	35	16	2,263	0	0	35	16
Metuchen borough	Middlesex	3	80	70	5,207	0	0	80	70
Middlesex borough	Middlesex	3	70	22	4,845	0	0	70	22
Milltown borough	Middlesex	3	36	2	2,579	0	0	36	2
Monroe township	Middlesex	3	126	221	17,428	0	0	126	221
New Brunswick city	Middlesex	3	40	0	14,063	0	0	40	0
North Brunswick township	Middlesex	3	195	0	14,563	0	0	195	0
Old Bridge township	Middlesex	3	109	0	23,859	0	0	109	0
Perth Amboy city	Middlesex	3	0	0	16,177	0	0	0	0
Piscataway township	Middlesex	3	309	49	17,237	0	0	309	49
Plainsboro township	Middlesex	3	5	98	9,249	0	0	5	98
Sayreville borough	Middlesex	3	0	0	15,722	0	0	0	0
South Amboy city	Middlesex	3	0	0	3,585	0	0	0	0
South Brunswick township	Middlesex	3	148	198	15,113	0	0	148	198
South Plainfield borough	Middlesex	3	51	75	8,126	0	0	51	75
South River borough	Middlesex	3	122	0	5,356	0	0	122	0
Spotswood borough	Middlesex	3	11	3	3,154	0	0	11	3
Woodbridge township	Middlesex	3	394	62	34,289	0	0	394	62
Bedminster township	Somerset	3	1	63	4,000	0	0	1	63
Bernards township	Somerset	3	51	418	9,646	0	0	51	418
Bernardsville borough	Somerset	3	0	45	2,572	0	0	0	45
Bound Brook borough	Somerset	3	76	3	3,475	0	0	76	3
Branchburg township	Somerset	3	6	177	5,174	0	0	6	177
Bridgewater township	Somerset	3	183	196	15,382	0	0	183	196
Far Hills borough	Somerset	3	2	16	381	0	0	2	16
Franklin township	Somerset	3	95	206	23,864	0	0	95	206
Green Brook township	Somerset	3	12	80	2,338	0	0	12	80
Hillsborough township	Somerset	3	88	282	13,391	0	0	88	282
Manville borough	Somerset	3	136	0	3,839	0	0	136	0
Millstone borough	Somerset	3	0	12	160	0	0	0	12
Montgomery township	Somerset	3	97	198	7,432	0	0	97	198
North Plainfield borough	Somerset	3	275	0	7,353	0	0	275	0
Peapack & Gladstone bor.	Somerset	3	0	82	936	0	0	0	82
Raritan borough	Somerset	3	34	0	2,955	0	0	34	0
Rocky Hill borough	Somerset	3	2	12	243	0	0	2	12
Somerville borough	Somerset	3	102	0	4,735	0	0	102	0
South Bound Brook borough	Somerset	3	93	2	1,582	0	0	93	2
Warren township	Somerset	3	86	153	4,921	0	0	86	153
Watchung borough	Somerset	3	29	78	2,092	0	0	29	78
East Windsor township	Mercer	4	57	122	9,824	0	0	57	122
Ewing township	Mercer	4	101	303	12,853	0	0	101	303
Hamilton township	Mercer	4	429	283	33,749	0	0	429	283
Hightstown borough	Mercer	4	35	21	1,920	0	0	35	21

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Hopewell borough	Mercer	4	15	11	757	0	0	15	11
Hopewell township	Mercer	4	0	260	6,587	0	0	0	260
Lawrence township	Mercer	4	48	108	12,056	0	0	48	108
Pennington borough	Mercer	4	68	6	1,030	0	0	68	6
Princeton	Mercer	4	86	306	9,540	0	0	86	306
Robbinsville township	Mercer	4	20	102	5,192	0	0	20	102
Trenton city	Mercer	4	0	0	28,155	0	0	0	0
West Windsor township	Mercer	4	127	129	9,607	0	0	127	129
Aberdeen township	Monmouth	4	101	56	6,977	0	0	101	56
Allenhurst borough	Monmouth	4	4	11	205	0	0	4	11
Allentown borough	Monmouth	4	10	9	679	0	0	10	9
Asbury Park city	Monmouth	4	91	0	6,608	0	0	91	0
Atlantic Highlands borough	Monmouth	4	84	2	1,733	0	0	84	2
Avon-by-the-Sea borough	Monmouth	4	0	38	933	0	0	0	38
Belmar borough	Monmouth	4	62	60	2,764	0	0	62	60
Bradley Beach borough	Monmouth	4	21	85	2,192	0	0	21	85
Brielle borough	Monmouth	4	12	43	1,863	0	0	12	43
Colts Neck township	Monmouth	4	18	45	3,202	0	0	18	45
Deal borough	Monmouth	4	2	23	344	0	0	2	23
Eatontown borough	Monmouth	4	135	42	5,287	0	0	135	42
Englishtown borough	Monmouth	4	37	3	691	0	0	37	3
Fair Haven borough	Monmouth	4	0	48	2,129	0	0	0	48
Farmingdale borough	Monmouth	4	2	6	554	0	0	2	6
Freehold borough	Monmouth	4	299	0	3,885	0	0	299	0
Freehold township	Monmouth	4	110	128	12,623	0	0	110	128
Hazlet township	Monmouth	4	28	62	7,030	0	0	28	62
Highlands borough	Monmouth	4	62	88	2,362	0	0	62	88
Holmdel township	Monmouth	4	49	47	5,582	0	0	49	47
Howell township	Monmouth	4	85	147	17,759	0	0	85	147
Interlaken borough	Monmouth	4	4	12	375	0	0	4	12
Keansburg borough	Monmouth	4	54	0	4,020	0	0	54	0
Keyport borough	Monmouth	4	0	0	3,168	0	0	0	0
Lake Como borough	Monmouth	4	3	29	767	0	0	3	29
Little Silver borough	Monmouth	4	10	37	2,093	0	0	10	37
Loch Arbour village	Monmouth	4	0	11	81	0	0	0	11
Long Branch city	Monmouth	4	134	0	12,159	0	0	134	0
Manalapan township	Monmouth	4	123	57	13,384	0	0	123	57
Manasquan borough	Monmouth	4	3	97	2,511	0	0	3	97
Marlboro township	Monmouth	4	134	141	12,700	0	0	134	141
Matawan borough	Monmouth	4	79	44	3,406	0	0	79	44
Middletown township	Monmouth	4	212	200	23,988	0	0	212	200
Millstone township	Monmouth	4	36	46	3,402	0	0	36	46
Monmouth Beach borough	Monmouth	4	0	50	1,563	0	0	0	50
Neptune township	Monmouth	4	44	0	11,213	0	0	44	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Neptune City borough	Monmouth	4	13	64	2,001	0	0	13	64
Ocean township	Monmouth	4	80	0	10,744	0	0	80	0
Oceanport borough	Monmouth	4	0	48	2,154	0	0	0	48
Red Bank borough	Monmouth	4	138	66	5,067	0	0	138	66
Roosevelt borough	Monmouth	4	6	5	277	0	0	6	5
Rumson borough	Monmouth	4	33	114	2,330	0	0	33	114
Sea Bright borough	Monmouth	4	13	12	731	0	0	13	12
Sea Girt borough	Monmouth	4	0	68	782	0	0	0	68
Shrewsbury borough	Monmouth	4	10	38	1,404	0	0	10	38
Shrewsbury township	Monmouth	4	32	21	469	0	0	32	21
Spring Lake borough	Monmouth	4	24	83	1,189	0	0	24	83
Spring Lake Heights bor.	Monmouth	4	25	57	2,203	0	0	25	57
Tinton Falls borough	Monmouth	4	120	104	8,120	0	0	120	104
Union Beach borough	Monmouth	4	64	29	2,035	0	0	64	29
Upper Freehold township	Monmouth	4	52	26	2,376	0	0	52	26
Wall township	Monmouth	4	140	200	10,023	0	0	140	200
West Long Branch borough	Monmouth	4	14	26	2,533	0	0	14	26
Barnegat township	Ocean	4	63	78	8,381	0	0	63	78
Barnegat Light borough	Ocean	4	14	19	292	0	0	14	19
Bay Head borough	Ocean	4	1	18	473	0	0	1	18
Beach Haven borough	Ocean	4	3	47	551	0	0	3	47
Beachwood borough	Ocean	4	4	37	3,575	0	0	4	37
Berkeley township	Ocean	4	0	0	20,654	0	0	0	0
Brick township	Ocean	4	332	316	29,942	0	0	332	316
Eagleswood township	Ocean	4	0	30	587	0	0	0	30
Harvey Cedars borough	Ocean	4	3	14	254	0	0	3	14
Island Heights borough	Ocean	4	3	13	694	0	0	3	13
Jackson township	Ocean	4	60	139	19,791	0	0	60	139
Lacey township	Ocean	4	80	73	10,600	0	0	80	73
Lakehurst borough	Ocean	4	19	0	893	0	0	19	0
Lakewood township	Ocean	4	0	0	24,773	0	0	0	0
Lavallette borough	Ocean	4	0	66	1,024	0	0	0	66
Little Egg Harbor township	Ocean	4	188	98	8,161	0	0	188	98
Long Beach township	Ocean	4	16	140	1,548	0	0	16	140
Manchester township	Ocean	4	0	0	22,572	0	0	0	0
Mantoloking borough	Ocean	4	0	28	175	0	0	0	28
Ocean township	Ocean	4	8	79	3,591	0	0	8	79
Ocean Gate borough	Ocean	4	11	14	792	0	0	11	14
Pine Beach borough	Ocean	4	4	12	797	0	0	4	12
Plumsted township	Ocean	4	3	0	2,934	0	0	3	0
Point Pleasant borough	Ocean	4	11	145	7,222	0	0	11	145
Point Pleasant Beach bor.	Ocean	4	36	116	1,838	0	0	36	116
Seaside Heights borough	Ocean	4	60	0	1,446	0	0	60	0
Seaside Park borough	Ocean	4	27	0	672	0	0	27	0

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Ship Bottom borough	Ocean	4	0	48	522	0	0	0	48
South Toms River borough	Ocean	4	29	3	1,035	0	0	29	3
Stafford township	Ocean	4	161	146	10,218	0	0	161	146
Surf City borough	Ocean	4	3	41	637	0	0	3	41
Toms River township	Ocean	4	308	600	34,910	0	0	308	600
Tuckerton borough	Ocean	4	32	26	1,293	0	0	32	26
Bass River township	Burlington	5	0	8	563	0	0	0	8
Beverly city	Burlington	5	0	10	954	0	0	0	10
Bordentown city	Burlington	5	27	21	1,816	0	0	27	21
Bordentown township	Burlington	5	2	30	4,363	0	0	2	30
Burlington city	Burlington	5	4	13	4,139	0	0	4	13
Burlington township	Burlington	5	15	129	7,572	0	0	15	129
Chesterfield township	Burlington	5	18	37	1,730	0	0	18	37
Cinnaminson township	Burlington	5	6	43	5,854	0	0	6	43
Delanco township	Burlington	5	0	6	1,726	0	0	0	6
Delran township	Burlington	5	12	83	5,980	0	0	12	83
Eastampton township	Burlington	5	0	64	2,437	0	0	0	64
Edgewater Park township	Burlington	5	30	48	3,602	0	0	30	48
Evesham township	Burlington	5	66	244	17,298	0	0	66	244
Fieldsboro borough	Burlington	5	0	5	185	0	0	0	5
Florence township	Burlington	5	55	30	4,813	0	0	55	30
Hainesport township	Burlington	5	0	43	2,240	0	0	0	43
Lumberton township	Burlington	5	0	111	4,444	0	0	0	111
Mansfield township	Burlington	5	0	65	3,166	0	0	0	65
Maple Shade township	Burlington	5	0	0	8,087	0	0	0	0
Medford township	Burlington	5	14	90	8,198	0	0	14	90
Medford Lakes borough	Burlington	5	0	20	1,574	0	0	0	20
Moorestown township	Burlington	5	25	177	7,376	0	0	25	177
Mount Holly township	Burlington	5	2	125	3,506	0	0	2	125
Mount Laurel township	Burlington	5	39	240	17,549	0	0	39	240
New Hanover township	Burlington	5	0	44	761	0	0	0	44
North Hanover township	Burlington	5	0	17	2,527	0	0	0	17
Palmyra borough	Burlington	5	0	0	3,160	0	0	0	0
Pemberton borough	Burlington	5	0	7	637	0	0	0	7
Pemberton township	Burlington	5	0	50	9,970	0	0	0	50
Riverside township	Burlington	5	0	0	2,809	0	0	0	0
Riverton borough	Burlington	5	0	15	1,071	0	0	0	15
Shamong township	Burlington	5	19	19	2,211	0	0	19	19
Southampton township	Burlington	5	20	18	4,700	0	0	20	18
Springfield township	Burlington	5	3	34	1,226	0	0	3	34
Tabernacle township	Burlington	5	0	29	2,442	0	0	0	29
Washington township	Burlington	5	1	11	304	0	0	1	11
Westampton township	Burlington	5	16	90	3,008	0	0	16	90
Willingboro township	Burlington	5	59	37	10,822	0	0	59	37

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Woodland township	Burlington	5	1	30	531	0	0	1	30
Wrightstown borough	Burlington	5	1	15	331	0	0	1	15
Audubon borough	Camden	5	71	15	3,566	0	0	71	15
Audubon Park borough	Camden	5	0	10	494	0	0	0	10
Barrington borough	Camden	5	24	40	2,913	0	0	24	40
Bellmawr borough	Camden	5	0	0	4,337	0	0	0	0
Berlin borough	Camden	5	57	13	2,685	0	0	57	13
Berlin township	Camden	5	50	57	1,887	0	0	50	57
Brooklawn borough	Camden	5	1	19	709	0	0	1	19
Camden city	Camden	5	0	0	24,838	0	0	0	0
Cherry Hill township	Camden	5	402	334	26,404	0	0	402	334
Chesilhurst borough	Camden	5	11	16	574	0	0	11	16
Clementon borough	Camden	5	0	0	2,200	0	0	0	0
Collingswood borough	Camden	5	31	0	6,285	0	0	31	0
Gibbsboro borough	Camden	5	29	17	770	0	0	29	17
Gloucester township	Camden	5	138	186	23,122	0	0	138	186
Gloucester City	Camden	5	96	41	4,146	0	0	96	41
Haddon township	Camden	5	55	35	6,181	0	0	55	35
Haddonfield borough	Camden	5	11	79	4,210	0	0	11	79
Haddon Heights borough	Camden	5	24	34	2,860	0	0	24	34
Hi-Nella borough	Camden	5	7	1	388	0	0	7	1
Laurel Springs borough	Camden	5	4	17	665	0	0	4	17
Lawnside borough	Camden	5	0	23	1,029	0	0	0	23
Lindenwold borough	Camden	5	0	0	7,414	0	0	0	0
Magnolia borough	Camden	5	19	19	1,713	0	0	19	19
Merchantville borough	Camden	5	0	29	1,596	0	0	0	29
Mount Ephraim borough	Camden	5	2	38	1,927	0	0	2	38
Oaklyn borough	Camden	5	14	19	1,700	0	0	14	19
Pennsauken township	Camden	5	0	0	12,126	0	0	0	0
Pine Hill borough	Camden	5	0	0	3,921	0	0	0	0
Pine Valley borough	Camden	5	0	10	1	(10)	0	0	0
Runnemede borough	Camden	5	0	0	3,024	0	0	0	0
Somerdale borough	Camden	5	0	0	2,129	0	0	0	0
Stratford borough	Camden	5	19	26	2,654	0	0	19	26
Tavistock borough	Camden	5	0	3	3	(3)	0	0	0
Voorhees township	Camden	5	306	26	11,233	0	0	306	26
Waterford township	Camden	5	0	24	3,504	0	0	0	24
Winslow township	Camden	5	66	89	13,943	0	0	66	89
Woodlynne borough	Camden	5	0	0	939	0	0	0	0
Clayton borough	Gloucester	5	38	35	3,115	0	0	38	35
Deptford township	Gloucester	5	79	96	11,761	0	0	79	96
East Greenwich township	Gloucester	5	48	41	3,317	0	0	48	41
Elk township	Gloucester	5	4	56	1,527	0	0	4	56
Franklin township	Gloucester	5	45	77	5,621	0	0	45	77

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Glassboro borough	Gloucester	5	10	18	5,881	0	0	10	18
Greenwich township	Gloucester	5	0	30	2,050	0	0	0	30
Harrison township	Gloucester	5	0	98	3,887	0	0	0	98
Logan township	Gloucester	5	0	151	2,178	0	0	0	151
Mantua township	Gloucester	5	52	79	5,848	0	0	52	79
Monroe township	Gloucester	5	81	64	12,858	0	0	81	64
National Park borough	Gloucester	5	6	5	1,049	0	0	6	5
Newfield borough	Gloucester	5	3	4	606	0	0	3	4
Paulsboro borough	Gloucester	5	14	0	2,184	0	0	14	0
Pitman borough	Gloucester	5	33	15	3,529	0	0	33	15
South Harrison township	Gloucester	5	0	21	965	0	0	0	21
Swedesboro borough	Gloucester	5	19	18	948	0	0	19	18
Washington township	Gloucester	5	158	148	17,254	0	0	158	148
Wenonah borough	Gloucester	5	0	16	790	0	0	0	16
West Deptford township	Gloucester	5	12	59	9,122	0	0	12	59
Westville borough	Gloucester	5	0	12	1,730	0	0	0	12
Woodbury city	Gloucester	5	0	0	3,970	0	0	0	0
Woodbury Heights borough	Gloucester	5	8	17	1,120	0	0	8	17
Woolwich township	Gloucester	5	0	79	3,434	0	0	0	79
Absecon city	Atlantic	6	32	0	3,119	0	0	32	0
Atlantic City	Atlantic	6	0	0	15,898	0	0	0	0
Brigantine city	Atlantic	6	30	161	4,290	0	0	30	161
Buena borough	Atlantic	6	0	0	1,649	0	0	0	0
Buena Vista township	Atlantic	6	52	12	2,926	0	0	52	12
Corbin City	Atlantic	6	1	8	229	0	0	1	8
Egg Harbor township	Atlantic	6	75	105	14,996	0	0	75	105
Egg Harbor City	Atlantic	6	0	0	1,451	0	0	0	0
Estell Manor city	Atlantic	6	0	4	610	0	0	0	4
Folsom borough	Atlantic	6	1	4	621	0	0	1	4
Galloway township	Atlantic	6	138	93	12,051	0	0	138	93
Hamilton township	Atlantic	6	90	46	9,271	0	0	90	46
Hammonton town	Atlantic	6	172	8	5,431	0	0	172	8
Linwood city	Atlantic	6	1	18	2,529	0	0	1	18
Longport borough	Atlantic	6	2	46	549	0	0	2	46
Margate City	Atlantic	6	40	266	3,155	0	0	40	266
Mullica township	Atlantic	6	0	18	2,051	0	0	0	18
Northfield city	Atlantic	6	3	10	3,166	0	0	3	10
Pleasantville city	Atlantic	6	144	0	6,920	0	0	144	0
Port Republic city	Atlantic	6	0	3	366	0	0	0	3
Somers Point city	Atlantic	6	0	0	4,459	0	0	0	0
Ventnor City	Atlantic	6	12	4	4,493	0	0	12	4
Weymouth township	Atlantic	6	5	2	1,173	0	0	5	2
Avalon borough	Cape May	6	0	313	971	(119)	0	0	194
Cape May city	Cape May	6	3	28	1,600	0	0	3	28

Municipality	County	Reg.	Adjusted Present Need	Adjusted Prospective Need	Est. 2015 Occ. Units	20% Capped Units	1,000 Capped Units	Capped Present Need	Capped Prospective Need
Cape May Point borough	Cape May	6	0	17	104	0	0	0	17
Dennis township	Cape May	6	39	19	2,471	0	0	39	19
Lower township	Cape May	6	24	82	9,974	0	0	24	82
Middle township	Cape May	6	33	14	7,647	0	0	33	14
North Wildwood city	Cape May	6	12	34	1,972	0	0	12	34
Ocean City	Cape May	6	32	849	5,798	0	0	32	849
Sea Isle City	Cape May	6	0	386	1,067	(173)	0	0	213
Stone Harbor borough	Cape May	6	0	111	437	(24)	0	0	87
Upper township	Cape May	6	6	30	4,841	0	0	6	30
West Cape May borough	Cape May	6	0	13	468	0	0	0	13
West Wildwood borough	Cape May	6	1	5	314	0	0	1	5
Wildwood city	Cape May	6	0	0	2,502	0	0	0	0
Wildwood Crest borough	Cape May	6	21	173	1,580	0	0	21	173
Woodbine borough	Cape May	6	0	0	783	0	0	0	0
Bridgeton city	Cumberland	6	193	0	5,902	0	0	193	0
Commercial township	Cumberland	6	0	0	1,895	0	0	0	0
Deerfield township	Cumberland	6	0	13	993	0	0	0	13
Downe township	Cumberland	6	10	0	552	0	0	10	0
Fairfield township	Cumberland	6	12	0	1,755	0	0	12	0
Greenwich township	Cumberland	6	0	3	400	0	0	0	3
Hopewell township	Cumberland	6	0	5	1,627	0	0	0	5
Lawrence township	Cumberland	6	5	4	1,184	0	0	5	4
Maurice River township	Cumberland	6	6	17	1,501	0	0	6	17
Millville city	Cumberland	6	138	17	10,291	0	0	138	17
Shiloh borough	Cumberland	6	3	0	219	0	0	3	0
Stow Creek township	Cumberland	6	0	3	501	0	0	0	3
Upper Deerfield township	Cumberland	6	29	38	2,888	0	0	29	38
Vineland city	Cumberland	6	294	24	20,979	0	0	294	24
Alloway township	Salem	6	0	0	1,144	0	0	0	0
Carneys Point township	Salem	6	22	19	3,169	0	0	22	19
Elmer borough	Salem	6	0	1	512	0	0	0	1
Elsinboro township	Salem	6	7	6	454	0	0	7	6
Lower Alloways Creek twp	Salem	6	3	7	626	0	0	3	7
Mannington township	Salem	6	2	7	501	0	0	2	7
Oldmans township	Salem	6	0	5	727	0	0	0	5
Penns Grove borough	Salem	6	0	0	1,905	0	0	0	0
Pennsville township	Salem	6	26	34	5,636	0	0	26	34
Pilesgrove township	Salem	6	8	10	1,495	0	0	8	10
Pittsgrove township	Salem	6	20	21	3,307	0	0	20	21
Quinton township	Salem	6	0	6	1,031	0	0	0	6
Salem city	Salem	6	11	0	1,946	0	0	11	0
Upper Pittsgrove township	Salem	6	8	20	1,151	0	0	8	20
Woodstown borough	Salem	6	0	9	1,376	0	0	0	9

APPENDIX E: INITIAL SUMMARY OBLIGATIONS BY MUNICIPALITY

TABLE E.1: INITIAL SUMMARY OBLIGATIONS BY MUNICIPALITY

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Allendale borough	Bergen	1	137	22	78	237
Alpine borough	Bergen	1	214	4	113	331
Bergenfield borough	Bergen	1	87	177	33	297
Bogota borough	Bergen	1	13	89	0	102
Carlstadt borough	Bergen	1	227	38	50	315
Cliffside Park borough	Bergen	1	28	173	39	240
Closter borough	Bergen	1	110	0	127	237
Cresskill borough	Bergen	1	70	57	235	362
Demarest borough	Bergen	1	66	0	89	155
Dumont borough	Bergen	1	33	46	86	165
East Rutherford borough	Bergen	1	90	235	38	363
Edgewater borough	Bergen	1	28	0	284	312
Elmwood Park borough	Bergen	1	54	51	34	139
Emerson borough	Bergen	1	74	82	83	239
Englewood city	Bergen	1	152	445	154	751
Englewood Cliffs borough	Bergen	1	219	0	239	458
Fair Lawn borough	Bergen	1	152	202	209	563
Fairview borough	Bergen	1	20	194	0	214
Fort Lee borough	Bergen	1	181	315	84	580
Franklin Lakes borough	Bergen	1	358	41	293	692
Garfield city	Bergen	1	0	0	0	0
Glen Rock borough	Bergen	1	118	17	94	229
Hackensack city	Bergen	1	201	225	0	426
Harrington Park borough	Bergen	1	56	6	101	163
Hasbrouck Heights borough	Bergen	1	58	74	257	389
Haworth borough	Bergen	1	64	0	62	126
Hillsdale borough	Bergen	1	111	15	91	217
Ho-Ho-Kus borough	Bergen	1	83	11	79	173
Leonia borough	Bergen	1	30	83	101	214
Little Ferry borough	Bergen	1	28	176	6	210
Lodi borough	Bergen	1	0	0	0	0
Lyndhurst township	Bergen	1	100	237	0	337
Mahwah township	Bergen	1	350	83	273	706
Maywood borough	Bergen	1	36	33	38	107

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

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Midland Park borough	Bergen	1	54	39	62	155
Montvale borough	Bergen	1	255	2	229	486
Moonachie borough	Bergen	1	95	35	50	180
New Milford borough	Bergen	1	23	46	44	113
North Arlington borough	Bergen	1	4	156	0	160
Northvale borough	Bergen	1	86	3	47	136
Norwood borough	Bergen	1	118	0	56	174
Oakland borough	Bergen	1	220	38	170	428
Old Tappan borough	Bergen	1	98	14	204	316
Oradell borough	Bergen	1	89	15	73	177
Palisades Park borough	Bergen	1	0	163	123	286
Paramus borough	Bergen	1	698	186	398	1,282
Park Ridge borough	Bergen	1	111	141	80	332
Ramsey borough	Bergen	1	189	59	147	395
Ridgefield borough	Bergen	1	47	167	27	241
Ridgefield Park village	Bergen	1	25	163	0	188
Ridgewood village	Bergen	1	229	14	228	471
River Edge borough	Bergen	1	73	46	94	213
River Vale township	Bergen	1	121	29	92	242
Rochelle Park township	Bergen	1	63	0	28	91
Rockleigh borough	Bergen	1	84	0	14	98
Rutherford borough	Bergen	1	95	195	130	420
Saddle Brook township	Bergen	1	127	43	68	238
Saddle River borough	Bergen	1	162	67	208	437
South Hackensack township	Bergen	1	50	72	29	151
Teaneck township	Bergen	1	192	121	639	952
Tenafly borough	Bergen	1	159	27	173	359
Teterboro borough	Bergen	1	106	0	6	112
Upper Saddle River borough	Bergen	1	206	8	255	469
Waldwick borough	Bergen	1	81	76	63	220
Wallington borough	Bergen	1	5	0	0	5
Washington township	Bergen	1	85	0	171	256
Westwood borough	Bergen	1	87	68	41	196
Woodcliff Lake borough	Bergen	1	170	22	199	391
Wood-Ridge borough	Bergen	1	38	0	33	71
Wyckoff township	Bergen	1	221	53	189	463
Bayonne city	Hudson	1	0	0	0	0
East Newark borough	Hudson	1	3	0	0	3
Guttenberg town	Hudson	1	23	0	0	23
Harrison town	Hudson	1	30	192	0	222
Hoboken city	Hudson	1	0	169	0	169
Jersey City	Hudson	1	0	1,740	0	1,740
Kearny town	Hudson	1	211	0	0	211

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
North Bergen township	Hudson	1	0	0	0	0
Secaucus town	Hudson	1	590	55	160	805
Union City	Hudson	1	0	471	0	471
Weehawken township	Hudson	1	3	69	0	72
West New York town	Hudson	1	0	57	0	57
Bloomingdale borough	Passaic	1	168	53	58	279
Clifton city	Passaic	1	379	1,000	0	1,379
Haledon borough	Passaic	1	5	36	0	41
Hawthorne borough	Passaic	1	58	57	0	115
Little Falls township	Passaic	1	101	114	75	290
North Haledon borough	Passaic	1	92	0	91	183
Passaic city	Passaic	1	0	1,000	0	1,000
Paterson city	Passaic	1	0	543	0	543
Pompton Lakes borough	Passaic	1	102	50	61	213
Prospect Park borough	Passaic	1	0	0	0	0
Ringwood borough	Passaic	1	51	9	47	107
Totowa borough	Passaic	1	247	116	100	463
Wanaque borough	Passaic	1	332	69	123	524
Wayne township	Passaic	1	1,158	180	678	2,016
West Milford township	Passaic	1	98	54	36	188
Woodland Park borough	Passaic	1	146	210	38	394
Andover borough	Sussex	1	7	0	12	19
Andover township	Sussex	1	55	7	228	290
Branchville borough	Sussex	1	13	1	75	89
Byram township	Sussex	1	33	31	79	143
Frankford township	Sussex	1	36	35	42	113
Franklin borough	Sussex	1	9	24	8	41
Fredon township	Sussex	1	29	26	83	138
Green township	Sussex	1	20	0	40	60
Hamburg borough	Sussex	1	14	14	10	38
Hampton township	Sussex	1	44	8	21	73
Hardyston township	Sussex	1	18	23	364	405
Hopatcong borough	Sussex	1	93	60	82	235
Lafayette township	Sussex	1	27	0	68	95
Montague township	Sussex	1	9	0	38	47
Newton town	Sussex	1	24	117	0	141
Ogdensburg borough	Sussex	1	13	7	9	29
Sandyston township	Sussex	1	13	6	32	51
Sparta township	Sussex	1	76	35	235	346
Stanhope borough	Sussex	1	15	6	28	49
Stillwater township	Sussex	1	15	0	39	54
Sussex borough	Sussex	1	0	0	0	0
Vernon township	Sussex	1	60	48	246	354

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Walpack township	Sussex	1	0	0	0	0
Wantage township	Sussex	1	35	5	19	59
Belleville township	Essex	2	0	1,000	0	1,000
Bloomfield township	Essex	2	0	480	0	480
Caldwell borough	Essex	2	0	21	4	25
Cedar Grove township	Essex	2	70	15	45	130
City of Orange township	Essex	2	0	843	0	843
East Orange city	Essex	2	0	0	0	0
Essex Fells borough	Essex	2	40	0	40	80
Fairfield township	Essex	2	318	70	107	495
Glen Ridge borough	Essex	2	28	28	39	95
Irvington township	Essex	2	0	0	0	0
Livingston township	Essex	2	375	21	195	591
Maplewood township	Essex	2	51	123	33	207
Millburn township	Essex	2	261	144	349	754
Montclair township	Essex	2	0	20	0	20
Newark city	Essex	2	0	0	0	0
North Caldwell borough	Essex	2	63	37	75	175
Nutley township	Essex	2	29	390	0	419
Roseland borough	Essex	2	182	0	64	246
S. Orange Village township	Essex	2	63	0	260	323
Verona township	Essex	2	24	0	54	78
West Caldwell township	Essex	2	200	54	73	327
West Orange township	Essex	2	226	427	31	684
Boonton town	Morris	2	11	38	19	68
Boonton township	Morris	2	20	25	38	83
Butler borough	Morris	2	16	30	34	80
Chatham borough	Morris	2	77	0	74	151
Chatham township	Morris	2	83	59	229	371
Chester borough	Morris	2	16	11	46	73
Chester township	Morris	2	32	27	51	110
Denville township	Morris	2	325	42	200	567
Dover town	Morris	2	6	269	0	275
East Hanover township	Morris	2	262	37	122	421
Florham Park borough	Morris	2	326	75	489	890
Hanover township	Morris	2	356	29	150	535
Harding township	Morris	2	83	0	100	183
Jefferson township	Morris	2	69	66	87	222
Kinnelon borough	Morris	2	73	0	64	137
Lincoln Park borough	Morris	2	74	8	65	147
Long Hill township	Morris	2	62	14	35	111
Madison borough	Morris	2	86	5	93	184
Mendham borough	Morris	2	25	10	37	72

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Mendham township	Morris	2	41	22	67	130
Mine Hill township	Morris	2	61	0	94	155
Montville township	Morris	2	261	16	155	432
Morris township	Morris	2	293	27	361	681
Morris Plains borough	Morris	2	144	35	50	229
Morristown town	Morris	2	227	128	101	456
Mountain Lakes borough	Morris	2	80	1	57	138
Mount Arlington borough	Morris	2	17	15	33	65
Mount Olive township	Morris	2	45	141	252	438
Netcong borough	Morris	2	0	20	7	27
Parsippany-Troy Hills twp	Morris	2	663	173	425	1,261
Pequannock township	Morris	2	134	76	104	314
Randolph township	Morris	2	261	30	180	471
Riverdale borough	Morris	2	58	2	104	164
Rockaway borough	Morris	2	43	15	64	122
Rockaway township	Morris	2	370	24	246	640
Roxbury township	Morris	2	255	26	180	461
Victory Gardens borough	Morris	2	0	0	0	0
Washington township	Morris	2	66	9	72	147
Wharton borough	Morris	2	42	97	63	202
Berkeley Heights township	Union	2	183	10	216	409
Clark township	Union	2	92	38	63	193
Cranford township	Union	2	148	97	71	316
Elizabeth city	Union	2	0	1,000	0	1,000
Fanwood borough	Union	2	45	16	35	96
Garwood borough	Union	2	18	41	7	66
Hillside township	Union	2	0	138	0	138
Kenilworth borough	Union	2	83	0	49	132
Linden city	Union	2	209	454	0	663
Mountainside borough	Union	2	123	138	53	314
New Providence borough	Union	2	135	65	62	262
Plainfield city	Union	2	0	512	0	512
Rahway city	Union	2	70	115	91	276
Roselle borough	Union	2	0	0	0	0
Roselle Park borough	Union	2	0	84	39	123
Scotch Plains township	Union	2	182	101	131	414
Springfield township	Union	2	135	0	49	184
Summit city	Union	2	171	172	184	527
Union township	Union	2	234	422	26	682
Westfield town	Union	2	139	76	203	418
Winfield township	Union	2	0	22	15	37
Allamuchy township	Warren	2	13	63	39	115
Alpha borough	Warren	2	13	13	34	60

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Belvidere town	Warren	2	0	8	0	8
Blairstown township	Warren	2	12	0	16	28
Franklin township	Warren	2	11	0	25	36
Frelinghuysen township	Warren	2	6	0	57	63
Greenwich township	Warren	2	41	0	87	128
Hackettstown town	Warren	2	62	135	18	215
Hardwick township	Warren	2	6	2	16	24
Harmony township	Warren	2	47	0	28	75
Hope township	Warren	2	8	3	17	28
Independence township	Warren	2	10	0	10	20
Knowlton township	Warren	2	14	17	11	42
Liberty township	Warren	2	7	0	33	40
Lopatcong township	Warren	2	56	0	41	97
Mansfield township	Warren	2	3	22	31	56
Oxford township	Warren	2	2	26	28	56
Phillipsburg town	Warren	2	0	0	0	0
Pohatcong township	Warren	2	47	8	88	143
Washington borough	Warren	2	0	13	11	24
Washington township	Warren	2	48	7	78	133
White township	Warren	2	16	85	47	148
Alexandria township	Hunterdon	3	22	37	23	82
Bethlehem township	Hunterdon	3	42	4	38	84
Bloomsbury borough	Hunterdon	3	17	3	39	59
Califon borough	Hunterdon	3	21	0	23	44
Clinton town	Hunterdon	3	51	23	13	87
Clinton township	Hunterdon	3	335	20	162	517
Delaware township	Hunterdon	3	23	27	15	65
East Amwell township	Hunterdon	3	40	2	22	64
Flemington borough	Hunterdon	3	38	72	0	110
Franklin township	Hunterdon	3	36	0	10	46
Frenchtown borough	Hunterdon	3	2	0	5	7
Glen Gardner borough	Hunterdon	3	7	8	5	20
Hampton borough	Hunterdon	3	2	19	7	28
High Bridge borough	Hunterdon	3	27	57	8	92
Holland township	Hunterdon	3	17	103	0	120
Kingwood township	Hunterdon	3	19	5	18	42
Lambertville city	Hunterdon	3	0	75	0	75
Lebanon borough	Hunterdon	3	34	5	33	72
Lebanon township	Hunterdon	3	28	0	21	49
Milford borough	Hunterdon	3	5	0	8	13
Raritan township	Hunterdon	3	360	28	123	511
Readington township	Hunterdon	3	394	136	281	811
Stockton borough	Hunterdon	3	6	0	8	14

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Tewksbury township	Hunterdon	3	119	0	61	180
Union township	Hunterdon	3	78	1	52	131
West Amwell township	Hunterdon	3	16	0	18	34
Carteret borough	Middlesex	3	0	1	0	1
Cranbury township	Middlesex	3	217	3	79	299
Dunellen borough	Middlesex	3	0	0	18	18
East Brunswick township	Middlesex	3	648	98	85	831
Edison township	Middlesex	3	965	652	171	1,788
Helmetta borough	Middlesex	3	26	6	1	33
Highland Park borough	Middlesex	3	0	1	0	1
Jamesburg borough	Middlesex	3	8	35	16	59
Metuchen borough	Middlesex	3	99	80	70	249
Middlesex borough	Middlesex	3	105	70	22	197
Milltown borough	Middlesex	3	64	36	2	102
Monroe township	Middlesex	3	554	126	221	901
New Brunswick city	Middlesex	3	0	40	0	40
North Brunswick township	Middlesex	3	395	195	0	590
Old Bridge township	Middlesex	3	438	109	0	547
Perth Amboy city	Middlesex	3	0	0	0	0
Piscataway township	Middlesex	3	736	309	49	1,094
Plainsboro township	Middlesex	3	205	5	98	308
Sayreville borough	Middlesex	3	261	0	0	261
South Amboy city	Middlesex	3	0	0	0	0
South Brunswick township	Middlesex	3	842	148	198	1,188
South Plainfield borough	Middlesex	3	379	51	75	505
South River borough	Middlesex	3	0	122	0	122
Spotswood borough	Middlesex	3	48	11	3	62
Woodbridge township	Middlesex	3	955	394	62	1,411
Bedminster township	Somerset	3	154	1	63	218
Bernards township	Somerset	3	508	51	418	977
Bernardsville borough	Somerset	3	127	0	45	172
Bound Brook borough	Somerset	3	0	76	3	79
Branchburg township	Somerset	3	302	6	177	485
Bridgewater township	Somerset	3	713	183	196	1,092
Far Hills borough	Somerset	3	38	2	16	56
Franklin township	Somerset	3	766	95	206	1,067
Green Brook township	Somerset	3	151	12	80	243
Hillsborough township	Somerset	3	461	88	282	831
Manville borough	Somerset	3	0	136	0	136
Millstone borough	Somerset	3	21	0	12	33
Montgomery township	Somerset	3	307	97	198	602
North Plainfield borough	Somerset	3	0	275	0	275
Peapack & Gladstone bor.	Somerset	3	82	0	82	164

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Raritan borough	Somerset	3	82	34	0	116
Rocky Hill borough	Somerset	3	25	2	12	39
Somerville borough	Somerset	3	153	102	0	255
South Bound Brook borough	Somerset	3	0	93	2	95
Warren township	Somerset	3	543	86	153	782
Watchung borough	Somerset	3	206	29	78	313
East Windsor township	Mercer	4	367	57	122	546
Ewing township	Mercer	4	481	101	303	885
Hamilton township	Mercer	4	706	429	283	1,418
Hightstown borough	Mercer	4	45	35	21	101
Hopewell borough	Mercer	4	29	15	11	55
Hopewell township	Mercer	4	520	0	260	780
Lawrence township	Mercer	4	891	48	108	1,047
Pennington borough	Mercer	4	52	68	6	126
Princeton	Mercer	4	641	86	306	1,033
Robbinsville township	Mercer	4	293	20	102	415
Trenton city	Mercer	4	0	0	0	0
West Windsor township	Mercer	4	899	127	129	1,155
Aberdeen township	Monmouth	4	270	101	56	427
Allenhurst borough	Monmouth	4	50	4	11	65
Allentown borough	Monmouth	4	28	10	9	47
Asbury Park city	Monmouth	4	0	91	0	91
Atlantic Highlands borough	Monmouth	4	86	84	2	172
Avon-by-the-Sea borough	Monmouth	4	20	0	38	58
Belmar borough	Monmouth	4	59	62	60	181
Bradley Beach borough	Monmouth	4	20	21	85	126
Brielle borough	Monmouth	4	159	12	43	214
Colts Neck township	Monmouth	4	218	18	45	281
Deal borough	Monmouth	4	54	2	23	79
Eatontown borough	Monmouth	4	504	135	42	681
Englishtown borough	Monmouth	4	65	37	3	105
Fair Haven borough	Monmouth	4	135	0	48	183
Farmingdale borough	Monmouth	4	19	2	6	27
Freehold borough	Monmouth	4	188	299	0	487
Freehold township	Monmouth	4	1,036	110	128	1,274
Hazlet township	Monmouth	4	407	28	62	497
Highlands borough	Monmouth	4	20	62	88	170
Holmdel township	Monmouth	4	768	49	47	864
Howell township	Monmouth	4	955	85	147	1,187
Interlaken borough	Monmouth	4	40	4	12	56
Keansburg borough	Monmouth	4	0	54	0	54
Keyport borough	Monmouth	4	1	0	0	1
Lake Como borough	Monmouth	4	31	3	29	63

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Little Silver borough	Monmouth	4	197	10	37	244
Loch Arbour village	Monmouth	4	30	0	11	41
Long Branch city	Monmouth	4	0	134	0	134
Manalapan township	Monmouth	4	706	123	57	886
Manasquan borough	Monmouth	4	149	3	97	249
Marlboro township	Monmouth	4	1,019	134	141	1,294
Matawan borough	Monmouth	4	141	79	44	264
Middletown township	Monmouth	4	1,561	212	200	1,973
Millstone township	Monmouth	4	81	36	46	163
Monmouth Beach borough	Monmouth	4	70	0	50	120
Neptune township	Monmouth	4	0	44	0	44
Neptune City borough	Monmouth	4	33	13	64	110
Ocean township	Monmouth	4	873	80	0	953
Oceanport borough	Monmouth	4	149	0	48	197
Red Bank borough	Monmouth	4	428	138	66	632
Roosevelt borough	Monmouth	4	29	6	5	40
Rumson borough	Monmouth	4	268	33	114	415
Sea Bright borough	Monmouth	4	37	13	12	62
Sea Girt borough	Monmouth	4	115	0	68	183
Shrewsbury borough	Monmouth	4	277	10	38	325
Shrewsbury township	Monmouth	4	12	32	21	65
Spring Lake borough	Monmouth	4	132	24	83	239
Spring Lake Heights bor.	Monmouth	4	76	25	57	158
Tinton Falls borough	Monmouth	4	622	120	104	846
Union Beach borough	Monmouth	4	83	64	29	176
Upper Freehold township	Monmouth	4	43	52	26	121
Wall township	Monmouth	4	1,073	140	200	1,413
West Long Branch borough	Monmouth	4	219	14	26	259
Barnegat township	Ocean	4	329	63	78	470
Barnegat Light borough	Ocean	4	83	14	19	116
Bay Head borough	Ocean	4	65	1	18	84
Beach Haven borough	Ocean	4	70	3	47	120
Beachwood borough	Ocean	4	123	4	37	164
Berkeley township	Ocean	4	610	0	0	610
Brick township	Ocean	4	930	332	316	1,578
Eagleswood township	Ocean	4	36	0	30	66
Harvey Cedars borough	Ocean	4	44	3	14	61
Island Heights borough	Ocean	4	31	3	13	47
Jackson township	Ocean	4	1,247	60	139	1,446
Lacey township	Ocean	4	580	80	73	733
Lakehurst borough	Ocean	4	66	19	0	85
Lakewood township	Ocean	4	0	0	0	0
Lavallette borough	Ocean	4	82	0	66	148

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Little Egg Harbor township	Ocean	4	194	188	98	480
Long Beach township	Ocean	4	41	16	140	197
Manchester township	Ocean	4	370	0	0	370
Mantoloking borough	Ocean	4	60	0	28	88
Ocean township	Ocean	4	236	8	79	323
Ocean Gate borough	Ocean	4	12	11	14	37
Pine Beach borough	Ocean	4	41	4	12	57
Plumsted township	Ocean	4	47	3	0	50
Point Pleasant borough	Ocean	4	343	11	145	499
Point Pleasant Beach bor.	Ocean	4	167	36	116	319
Seaside Heights borough	Ocean	4	0	60	0	60
Seaside Park borough	Ocean	4	52	27	0	79
Ship Bottom borough	Ocean	4	71	0	48	119
South Toms River borough	Ocean	4	51	29	3	83
Stafford township	Ocean	4	555	161	146	862
Surf City borough	Ocean	4	49	3	41	93
Toms River township	Ocean	4	2,233	308	600	3,141
Tuckerton borough	Ocean	4	69	32	26	127
Bass River township	Burlington	5	15	0	8	23
Beverly city	Burlington	5	18	0	10	28
Bordentown city	Burlington	5	33	27	21	81
Bordentown township	Burlington	5	211	2	30	243
Burlington city	Burlington	5	89	4	13	106
Burlington township	Burlington	5	445	15	129	589
Chesterfield township	Burlington	5	55	18	37	110
Cinnaminson township	Burlington	5	331	6	43	380
Delanco township	Burlington	5	61	0	6	67
Delran township	Burlington	5	208	12	83	303
Eastampton township	Burlington	5	49	0	64	113
Edgewater Park township	Burlington	5	30	30	48	108
Evesham township	Burlington	5	534	66	244	844
Fieldsboro borough	Burlington	5	19	0	5	24
Florence township	Burlington	5	114	55	30	199
Hainesport township	Burlington	5	150	0	43	193
Lumberton township	Burlington	5	152	0	111	263
Mansfield township	Burlington	5	114	0	65	179
Maple Shade township	Burlington	5	0	0	0	0
Medford township	Burlington	5	418	14	90	522
Medford Lakes borough	Burlington	5	60	0	20	80
Moorestown township	Burlington	5	621	25	177	823
Mount Holly township	Burlington	5	0	2	125	127
Mount Laurel township	Burlington	5	815	39	240	1,094
New Hanover township	Burlington	5	4	0	44	48

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
North Hanover township	Burlington	5	1	0	17	18
Palmyra borough	Burlington	5	39	0	0	39
Pemberton borough	Burlington	5	9	0	7	16
Pemberton township	Burlington	5	0	0	50	50
Riverside township	Burlington	5	6	0	0	6
Riverton borough	Burlington	5	15	0	15	30
Shamong township	Burlington	5	84	19	19	122
Southampton township	Burlington	5	85	20	18	123
Springfield township	Burlington	5	54	3	34	91
Tabernacle township	Burlington	5	106	0	29	135
Washington township	Burlington	5	11	1	11	23
Westampton township	Burlington	5	221	16	90	327
Willingboro township	Burlington	5	268	59	37	364
Woodland township	Burlington	5	19	1	30	50
Wrightstown borough	Burlington	5	10	1	15	26
Audubon borough	Camden	5	0	71	15	86
Audubon Park borough	Camden	5	4	0	10	14
Barrington borough	Camden	5	8	24	40	72
Bellmawr borough	Camden	5	107	0	0	107
Berlin borough	Camden	5	154	57	13	224
Berlin township	Camden	5	109	50	57	216
Brooklawn borough	Camden	5	23	1	19	43
Camden city	Camden	5	0	0	0	0
Cherry Hill township	Camden	5	1,829	402	334	2,565
Chesilhurst borough	Camden	5	28	11	16	55
Clementon borough	Camden	5	19	0	0	19
Collingswood borough	Camden	5	0	31	0	31
Gibbsboro borough	Camden	5	112	29	17	158
Gloucester township	Camden	5	359	138	186	683
Gloucester City	Camden	5	0	96	41	137
Haddon township	Camden	5	35	55	35	125
Haddonfield borough	Camden	5	192	11	79	282
Haddon Heights borough	Camden	5	23	24	34	81
Hi-Nella borough	Camden	5	0	7	1	8
Laurel Springs borough	Camden	5	17	4	17	38
Lawnside borough	Camden	5	33	0	23	56
Lindenwold borough	Camden	5	0	0	0	0
Magnolia borough	Camden	5	22	19	19	60
Merchantville borough	Camden	5	0	0	29	29
Mount Ephraim borough	Camden	5	33	2	38	73
Oaklyn borough	Camden	5	1	14	19	34
Pennsauken township	Camden	5	0	0	0	0
Pine Hill borough	Camden	5	22	0	0	22

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Pine Valley borough	Camden	5	47	0	0	47
Runnemede borough	Camden	5	40	0	0	40
Somerdale borough	Camden	5	95	0	0	95
Stratford borough	Camden	5	70	19	26	115
Tavistock borough	Camden	5	80	0	0	80
Voorhees township	Camden	5	456	306	26	788
Waterford township	Camden	5	102	0	24	126
Winslow township	Camden	5	377	66	89	532
Woodlynne borough	Camden	5	0	0	0	0
Clayton borough	Gloucester	5	94	38	35	167
Deptford township	Gloucester	5	522	79	96	697
East Greenwich township	Gloucester	5	252	48	41	341
Elk township	Gloucester	5	127	4	56	187
Franklin township	Gloucester	5	166	45	77	288
Glassboro borough	Gloucester	5	0	10	18	28
Greenwich township	Gloucester	5	308	0	30	338
Harrison township	Gloucester	5	198	0	98	296
Logan township	Gloucester	5	454	0	151	605
Mantua township	Gloucester	5	292	52	79	423
Monroe township	Gloucester	5	439	81	64	584
National Park borough	Gloucester	5	28	6	5	39
Newfield borough	Gloucester	5	14	3	4	21
Paulsboro borough	Gloucester	5	0	14	0	14
Pitman borough	Gloucester	5	40	33	15	88
South Harrison township	Gloucester	5	31	0	21	52
Swedesboro borough	Gloucester	5	23	19	18	60
Washington township	Gloucester	5	507	158	148	813
Wenonah borough	Gloucester	5	30	0	16	46
West Deptford township	Gloucester	5	368	12	59	439
Westville borough	Gloucester	5	27	0	12	39
Woodbury city	Gloucester	5	0	0	0	0
Woodbury Heights borough	Gloucester	5	55	8	17	80
Woolwich township	Gloucester	5	209	0	79	288
Absecon city	Atlantic	6	144	32	0	176
Atlantic City	Atlantic	6	2,458	0	0	2,458
Brigantine city	Atlantic	6	124	30	161	315
Buena borough	Atlantic	6	41	0	0	41
Buena Vista township	Atlantic	6	19	52	12	83
Corbin City	Atlantic	6	13	1	8	22
Egg Harbor township	Atlantic	6	763	75	105	943
Egg Harbor City	Atlantic	6	42	0	0	42
Estell Manor city	Atlantic	6	21	0	4	25
Folsom borough	Atlantic	6	20	1	4	25

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Galloway township	Atlantic	6	328	138	93	559
Hamilton township	Atlantic	6	349	90	46	485
Hammonton town	Atlantic	6	257	172	8	437
Linwood city	Atlantic	6	140	1	18	159
Longport borough	Atlantic	6	59	2	46	107
Margate City	Atlantic	6	97	40	266	403
Mullica township	Atlantic	6	40	0	18	58
Northfield city	Atlantic	6	190	3	10	203
Pleasantville city	Atlantic	6	0	144	0	144
Port Republic city	Atlantic	6	19	0	3	22
Somers Point city	Atlantic	6	103	0	0	103
Ventnor City	Atlantic	6	27	12	4	43
Weymouth township	Atlantic	6	15	5	2	22
Avalon borough	Cape May	6	234	0	194	428
Cape May city	Cape May	6	58	3	28	89
Cape May Point borough	Cape May	6	34	0	17	51
Dennis township	Cape May	6	220	39	19	278
Lower township	Cape May	6	324	24	82	430
Middle township	Cape May	6	454	33	14	501
North Wildwood city	Cape May	6	80	12	34	126
Ocean City	Cape May	6	411	32	849	1,292
Sea Isle City	Cape May	6	109	0	213	322
Stone Harbor borough	Cape May	6	141	0	87	228
Upper township	Cape May	6	317	6	30	353
West Cape May borough	Cape May	6	7	0	13	20
West Wildwood borough	Cape May	6	33	1	5	39
Wildwood city	Cape May	6	0	0	0	0
Wildwood Crest borough	Cape May	6	42	21	173	236
Woodbine borough	Cape May	6	88	0	0	88
Bridgeton city	Cumberland	6	0	193	0	193
Commercial township	Cumberland	6	45	0	0	45
Deerfield township	Cumberland	6	41	0	13	54
Downe township	Cumberland	6	10	10	0	20
Fairfield township	Cumberland	6	79	12	0	91
Greenwich township	Cumberland	6	13	0	3	16
Hopewell township	Cumberland	6	114	0	5	119
Lawrence township	Cumberland	6	10	5	4	19
Maurice River township	Cumberland	6	22	6	17	45
Millville city	Cumberland	6	0	138	17	155
Shiloh borough	Cumberland	6	7	3	0	10
Stow Creek township	Cumberland	6	14	0	3	17
Upper Deerfield township	Cumberland	6	242	29	38	309
Vineland city	Cumberland	6	0	294	24	318

Municipality	County	Reg.	Prior Rd (87-99) Initial Obligation (unadjusted)	Capped Present Need	Capped Prospective Need	Initial Summary Obligation[105]
Alloway township	Salem	6	17	0	0	17
Carneys Point township	Salem	6	184	22	19	225
Elmer borough	Salem	6	12	0	1	13
Elsinboro township	Salem	6	26	7	6	39
Lower Alloways Creek twp	Salem	6	26	3	7	36
Mannington township	Salem	6	19	2	7	28
Oldmans township	Salem	6	184	0	5	189
Penns Grove borough	Salem	6	0	0	0	0
Pennsville township	Salem	6	228	26	34	288
Pilesgrove township	Salem	6	35	8	10	53
Pittsgrove township	Salem	6	58	20	21	99
Quinton township	Salem	6	15	0	6	21
Salem city	Salem	6	0	11	0	11
Upper Pittsgrove township	Salem	6	27	8	20	55
Woodstown borough	Salem	6	8	0	9	17