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PROPOSED COUNTER FINDINGS AND CONCLUSIONS TOWNSHIP OF HANOVER

HOUSING REGION AND ALLOCATION CARL LINDBLOOM

- 1. The DCA's methodology for determining region, as well as allocation, is based upon Region II as designated by the DCA, which represents a combination of eight (8) counties, i.e., political subdivisions of the State, namely, Bergen, Essex, Hudson, Middlesex, Morris, Passaic, Somerset and Union. Revised Statewide Housing Allocation Report for New Jersey (May 1978), hereinafter referred to as "Housing Allocation Report".
- 2. These counties, combined together as political subdivisions, lack the common thread or element which connect or link areas together for the purpose of forming a region for either employment or housing purposes. Lindbloom Reports, 12/10/79 and 12/13/79.
- 3. For purposes of defining a region, the most important element is the basic relationship between persons' place of residence and their place of employment. Lindbloom Reports of 12/10/79 and 12/13/79.
- 4. The housing and/or employment region for Hanover can best be defined as those municipalities or parts thereof located within a 30 minute driving time from the center of Hanover Township, i.e., the Hanover Township Municipal Building located on Route #10. Lindbloom Report of 12/10/79.

- 5. The utilization of a 30 minute commute by auto is based upon the following reports or studies:
- (a) In 1970, 74.1% of the New Jersey labor force commuted to work by auto, an increase over the 1960 figure of 64.4%.
 - (b) 88.2% of all workers travelled 19 miles.
 - (c) 85.6% of all workers travelled up to 35 minutes.
- (d) 71.6% of all workers travelled up to 25 minutes. See Lindbloom Report of 12/10/79; Deposition of January 15, 1980, and Nationwide Personal Transportation Study Report #8, U.S. Department of Transportation (#L-2, Deposition of 1/15/80 of Lindbloom.)

In 1980, the reliance upon the auto for the commute to work_is on the average 80%. See Deposition of 1/15/80. See also Bridge-water Twp. Study prepared by Robert Strong (Lindbloom Deposition of 1/15/80, which established that 91% of persons employed in Hanover Township lived within 30 minutes.)

- 6. The 30 minute drive, for purposes of defining a region, is computed by using an average speed of 50 miles per hour on interstate highways; 40 miles per hour on U.S. and State highways; and, 30 miles per hour on county roads. And, a municipality is included in the region if at least one-half of the community can be covered by a 30 minute driving time. Lindbloom Report of 12/10/79.
- 7. Hanover's region for purposes of housing or employment is set forth in Exhibit I attached hereto, including area and population. See Lindbloom Report of 12/10/79, Appendix 2. Report PT-6, New Jersey Municipal Profiles, New Jersey Department of Community Affairs, January 1972.

8. The commuting times, distances and costs required to sustain the validity of the region as defined by DCA are not at all economically feasible or realistic, particularly for lower income persons. See Lindbloom Report pf 12/13/79.

<u>Conclusion</u>: The region as defined by DCA is inappropriate and does not have any substantive basis for its composition. The methodology utilized is flawed. Lindbloom, see Deposition of 1/15/80.

- 9. The housing need as proposed by DCA is based upon projected population increases from 1970-1990. See Allocation Report at 8-9; Lindbloom.
- 10. The following table accurately shows, for the eight counties in DCA's Region II, actual 1970 population based on the U.S. Census Count; 1977 population based on the latest U.S. Census estimates; 1978 population based on Official State Estimates for New Jersey; 1980 population based on Preliminary U.S. Census figures; and, 1990 population projections utilized by the DCA:

	(1) 1970 Population	(2) 1977 Population	(3) 1978 Population	(4) 1980 Population	(5) 1990 DCA Projection
Bergen	897,148	874,329	865,200	837,835	949,507
Essex	932,526	852,345	829,900	*	924,512
Hudson	607,839	564,189	554,000	534,184	600,534
Middlesex	583,813	593,823	591,100	581,545	677,617
Morris	383,454	396,513	404,000	404,148	463,517
Passaic	460,782	460,288	466,800**	439,807	501,825
Somerset	198,372	203,650	207,800	197,157	226,337
Union	534,116	512,273	509,600	*	570,831
TOTAL	4.598.050	4.457.410	4.428.400		4,688,343

^{*1980} figure not yet available

- 11. DCA's <u>Allocation Report</u> setting forth "prospective housing need" is based in part upon an assumed population growth in Region II as defined by DCA during the period of 1970-1990 from 4,598,050 in 1970 to 4,688,343 in 1990.
- 12. The population as defined by DCA has actually decreased between 1970-1977 by approximately 141,000 or 3.1% from 1970-1977 and decreased by approximately 169,650 or 3.7% from 1970-1978 and it would appear additional decreases will occur for 1980 based upon the U.S. Census Reports. See Official State Estimates.
- 13. Region II as established by DCA is a region from which there is a present outward migration of population from Region II. See Official State Estimates.
- 14. Six of the eight counties included within Region II experienced net outward migration from 1970-1978. See Exhibit 3 (Official State Estimates) Lindbloom.
- 15. Existing population trends point to a population decrease in the region as comprised by DCA by the year 1990. Lind-bloom and Official State Estimates.
- 16. Any methodology which includes a factor for vacant land for housing needs is similarly flawed as there is no basis for the utilization of such a factor. See Lindbloom Report of 12/13/79.

Conclusion: Not only is the methodology utilized by DCA flawed in its attempt to develop a region, but utilizing its region, DCA's population projections for "Region II" are totally unrealistic, inaccurate and highly inflated. Population trends for DCA's region point to a population decrease in the region's population and substantial revisions should be required as a result of the 1980 Census Data. See Lindbloom Report of 12/13/79.

17. Although Morris and Somerset, two counties within the DCA's region, have not suffered from outward migration, the net inward migration into Morris for 1970-1978 was only .03%. See <u>Official State Estimates</u> at 6.

- 18. Those migrating from other counties of Region II are not migrating into Morris as indicated by the <u>Official State Estimates</u>. See Lindbloom Report of 12/13/79.
- 18. Hanover Township's population has increased as follows, based upon Census Data:

1950 - 3,756

1960 - 9,329

1970 - 10,700

1980 - 11,764

The average increase annually for the past twenty (20) years has been approximately 1%. See Lindbloom Report of 12/13/79.

- 19. Hanover Township has not become the recipient of the outward migration from the other counties in Region II. See Lindbloom Report of 12/13/79.
- 20. Housing needs for any municipality can best be determined utilizing a methodology involving an econometric model which determines the municipality's allocation of the region's housing need as a derivative of the region's employment, wages and economic characteristics.

 See Lindbloom Report of 12/13/79.
- 21. For the period from 1970 through 1978, the Township's total employment base increased by only 4.2%, representing a total gain of 498 jobs over its 1970 employment level of 11,957 jobs. See Lindbloom

Report of 12/13/79.

- 22. Utilizing the time frame of 1970-1978 for economic growth, which time frame is more realistic in terms of economic growth than the 1960s, employment projections for the years 1980, 1985 and 1990 can best be projected on a straight-line basis. See Lindbloom Report of 12/13/79.
- 23. Utilizing the straight-line method, Hanover Township, with a 1978 employment base of 12,455, is projected to increase to 13,199 and the Hanover region, as defined by Lindbloom from 850,997 in 1978 to 949,270 in 1990. See Lindbloom Report of 12/13/79, pg. 8, Table I.
- 24. The median family and mean household incomes for work force families in the Hanover Region were \$11,714 and 12,225. See Lindbloom Report of 12/13/79, pg. 10, and Census Data.
- 25. Each new job in the region creates the requirement for 0.8000 new housing units. See Lindbloom Report of 12/13/79.
- 26. Based upon the projection of new jobs in the region through 1990 of 98,273 between 1978 and 1990 times 0.8000, there would be a need for 78,618 new housing units. See Lindbloom Report of 12/13/79.
- 27. 15.69% of the region's work force families, as defined by Lindbloom, have low incomes, while 19.47% of the region's work force families have moderate incomes. See Lindbloom Report of 12/13/79, pgs. 11-14, and Tables 2 and 3.
- 28. The Hanover Region, as defined by Lindbloom, will have a need for 12,235 low income units and 15,307 moderate income units. See Lindbloom Report of 12/13/79.
 - 29. Hanover's increase in employment between 1978 and 1990 is

estimated at 744 jobs, or 0.757% of the total regional employment growth of 98,273 jobs between 1978 and 1990. See Lindbloom Report of 12/13/79.

- 30. Hanover's allocation, therefore, subject to other considerations, should, therefore, be 0.757% or 595 new dwelling units to which a factor for vacancies and loss must be added, for a total allocation of 619 new housing units. See Lindbloom Report of 12/13/79 and Table at page 15.
- 31. Based upon income distribution analysis, 15.69% of the region's work force families have low incomes and 19.47% of the region's work force families have moderate incomes. See Lindbloom Report of 12/13/79, pg. 16.
- 32. Based upon the above need of 619 units, Hanover's allocation, without reference to other considerations, such as environmental constraints, costs, etc., would be for the period 1978 through 1990, 97 net new housing units and 121 new moderate income housing units. See Lindbloom Report of 12/13/79, pg. 17.

Approximation Two

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Garriold City	•		30,797
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May wood Horough		1.30	11,007
North Arlington Berough		2.60	18,0%
Roche ble Back Township		1.10	(c) 300
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		19.70	165,98h
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(All of County)	. i.	127.44	91.2,299
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and the second s			
(All municipalities except for Ashington Township)		425.12	376,492
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Process County (13)			
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Chillian City		11.20	82,411
Wilciam Torough	· · ·	1.30	6,767
Hadhorne Horough		s.lili	19,171
Little Fills Township		2.80	7.7. LL , 7.27
Horth Halodon Borough		3.50	7,614
Principle Gity		3.20	65,424
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Lompton Lakou Borough		3.00	11,397
Pro post Park Borough		0.45	5,176
Tolow Clorough		4.00	11,580
Mayne Town Jacp		24.39	1,9,11,1
West Patterson			11,692 11,1692
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	27244	
notes county (1)		
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Hop deeing Borough	10.80	9,052
Lahopa Borough	1.70	5,040
	<u>1.70</u> 31.98	16,60
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term by Horgida Township	6.50	13,078
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New Trevidence Burough	1.50	
tio effect ark Horough	1.30	Ш.,277
garageredd Township	- 5,20	15,7h0
Someth City	6.00	21,620
Union Township	9.00	53,077
Weattield Town	6.50	11,7.10
	G1.09	350,9 14
Regional Totals	880.64 89. mt.	2,351,270

Source for municipal area and 1970 population:
Report PT 6
New Jorney Municipal Profiles
Rew Jersey Dept. of Community Affairs
January, 1972

COMPONENTS OF RESIDENT POPULATION CHANGE BY COUNTY APRIL 1, 1970 TO JULY 1, 1978

	POPULATION		COMPONENTS OF CHANGE		
	April 1,	July 1,		Natural	Net
COUNTY	1970	1978 (P)	Total	Increment	Migration
Atlantic	175,043	190,000	14,900	1,400	13,500
Bergen	897,148	865,200	-31,900	12,700	-44,600
Burlington	323,132	363,500	40,400	23,800	16,700
Camden	456,291	471,600	15,300	23,400	-8,000
Cape May	59,554	77,000	17,400	-1,800	19,200
Cumberland	121,374	130,200	8,800	7,700	1,100
Essex	932,526	829,900	-102,600	33,000	-135,600
Gloucester	172,681	200,000	27,300	9,900	17,400
Hudson	607,839	554,000	-53,900	16,300	-70,200
Hunterdon	69,718	84,200	14,400	2,900	11,600
Mercer	304,116	317,200	13,100	11,500	1,500
Middlesex	583,813	591,100	7,300	28,000	-20,700
Monmouth	461,849	499,900	38,000	17,100	21,000
Morris	383,454	404,000	20,500	20,500	100
Осеал	208,470	331,500	123,100	6,500	116,500
Passaic ²	460,782	466,800	6,100	20,800	-14,700
Salem	60,346	62,400	2,100	2,600	-500
Somerset	198,372	207,800	9,400	7,000	2,400
Sussex	77,528	109,200	31,700	6,400	25,300
Union	543,116	509,600	-33,500	9,800	-43,300
Warren	73,960	84,000	10,000	2,200	7,800
STATE TOTAL ²	7,171,112	7,349,000	178,000	262,000	-84,000

⁽P) Provisional

State estimates are shown to nearest thousand. County estimates to nearest hundred. Components of change may not add to totals due to rounding.

²The findings of a reevaluation currently underway of the City of Paterson's population estimate may affect 1977 and 1978 population estimates for Passaic County and the State total. See page 2.

EXHIBIT III

County:	1970-1978 Net Migration:		Net Migration as % of April, 1970 Population:	
Bergen	- 44,600		- 5.0%	
Essex	-135,600		-14.5%	
Hudson	- 70,200		-11.5%	
Middlesex	- 20,700		- 3.5%	
Passaic	- 14,700		- 3.2%	
Union	- 43,300		- 8.0%	
TOTALS	- 329,100		- 8.2%	

SOURCE: Official State Estimates, at 6.