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Rockaway

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Housing Allocation Study

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ROCKAWAY TOWNSHIP
HOUSING ALLOCATION STUDY
REVISED FEBRUARY 14, 1984

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INTRODUCTION

The Study outlined on the following pages is designed to establish a reasonable housing allocation for Rockaway Township. It is based on straight forward, objective methodology involving evaluation of available data. The Allocation Study is comprised of three sections:





- * Section I delineates the region within which Rockaway is situated and determines the Township's share to satisfy low-and moderate-income housing needs within that region
- * Section II establishes the number of dwelling units required for low-and moderate-income households indigenous to Rockaway Township
- * Section III summarizes the Township's total aggregate housing obligation to provide suitable shelter for low-and moderate-income households to the year 1990 based on regional share and indigenous need.

The availability of the methodologies employed is not limited to Rockaway Township. They constitute an attempt for universal approach to the problem of housing allocations which avoids subjective judgments and its inherent pitfalls.

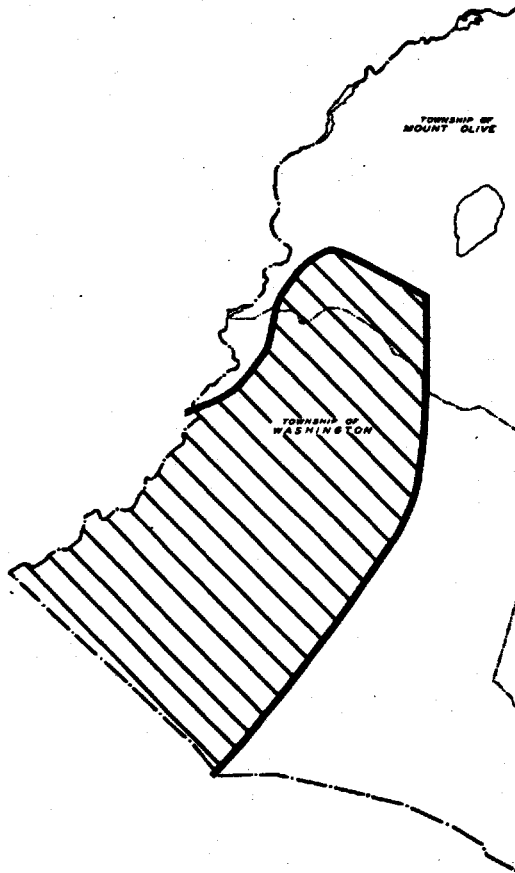
Since the allocations are based on projections of trends in previous years and statistical data, periodic review is important. Preferably, such reviews should be performed annually.

1980 NEWARK STANDARD METROPOLITAN STATISTICAL AREA

STATE DE GUIDE PL MORRIS COL

-  GROWTH AREA
-  LIMITED GROWTH AREA
-  AGRICULTURE AREA
-  CONSERVATION AREA

SOURCE: MORRIS COUNTY PLANNING BOARD
D.C.A. STATE DEVELOPMENT GUIDE PLAN



SECTION I - THE REGIONAL SHARE

A. ESTABLISHMENT OF THE HOUSING REGION

The defendant municipalities in the Public Advocate's pending litigation have jointly retained P. David Zimmerman, a professional planner, to establish rational parameters of a logical housing region that may be reasonably applicable to each municipality in Morris County. Mr. Zimmerman was also charged with the responsibility of determining an estimated number of Morris County's fair share of the present and prospective low and moderate income housing need of that region to meet the mandate of the Mt. Laurel II Supreme Court decision.

In his revised report, dated January 25, 1984 Mr. Zimmerman substantiates the reasonableness of using the Newark SMSA (Standard Metropolitan Statistical Area) as set forth in the 1980 United States Census as the most appropriate housing region of which Morris County is a part. This SMSA consists of all of the counties of Morris, Essex, Somerset and Union as indicated on the accompanying map.

B. THE PRESENT AND PROSPECTIVE HOUSING NEED

The establishment of this Region and the relatively complete data-availability enabled Mr. Zimmerman to estimate the lower income housing need for the four-county area. It was calculated that the "present" regional housing need is for 4,945 housing units and the "prospective" need is for 12,004 units, amounting to a total Regional Housing Need affordable by lower income households of 16,949 new housing units by 1990.

C. THE MORRIS COUNTY SHARE OF THE REGIONAL HOUSING NEED

As outlined in the Zimmerman Report, the Morris County share of the Regional Housing Need was established on the basis of the County's proportion of open and developable growth areas within the four-county Housing Region as reflected by the State Development Guide Plan. Consistent with this share of 46.37 percent, the 1990 lower income housing obligation for Morris County was calculated to

consist of a present need of 2,293 units and a prospective need of 5,566 units for a total need of 7,859 housing units apportioned in the following manner:

**TABLE 1
MORRIS COUNTY LOWER INCOME
HOUSING NEED, 1990**

Low Income Housing Need @ 61.9%	4,865 units
Moderate Income Housing Need @ 38.1%	<u>2,994 units</u>
Total 1990 Lower Income Housing Need	7,859 units

D. ROCKAWAY TOWNSHIP SHARE OF THE MORRIS COUNTY HOUSING NEED

In order to develop a fair and equitable method for the distribution of Morris County lower income housing obligation, alternative methodologies and several factors were considered. The use of vacant, developable land as the basis for determining the municipal share of the County housing obligation was deemed inappropriate. One major reason is that the only available data in this regard is that contained in "A Revised Statewide Housing Allocation Report for New Jersey" (Published by DCA in May, 1978). The information in that report is detailed by State, County and individual municipality but is not segregated into growth, limited growth, agriculture and conservation areas as delineated in 1980 by the State Development Guide Plan. The use of such all-inclusive information would have the effect of treating the entire land area of the region as if it were designated for immediate growth and would be inconsistent from the perspective of sound planning and contrary to specifically articulated objectives of the Mount Laurel II decision, which states (p.244)

"in no-growth areas no municipality will have to provide for more than the present need generated within the municipality, for to require more than that would be to induce growth in that municipality in conflict with the SDGP"

"It is our intention by this decision to channel the entire prospective lower income housing need in New Jersey into "growth

areas."

The irrelevancy of the DCA's developable land data for the purpose of determining the individual municipal share of the County's total obligation is particularly apparent with respect to Rockaway Township, where the "growth area" designation of the SDGP extends to only 20 percent of its total area and includes relatively limited amounts of vacant land suitable for development. The use of such data, not relevant to Rockaway Township, would therefore, by necessity, lead to grossly disproportionate and invalid conclusions. For this reason no attempt to determine the Township's share of the County's total lower income housing need by available open land was felt justified, since the development of an up-to-date vacant land analysis of growth areas for each of the 39 Morris County municipalities does not, at this time, appear to be a realistic alternative.

The use of employment data as a factor for calculating the Township's share of the regional lower income housing need was also considered and discarded for the following reasons:

1. Projections of prospective employment on the basis of past trends are subject too many variables and unknowns of the marketplace and municipal [REDACTED] land use policies to produce even remotely reliable data for future job opportunities by municipal breakdown.
2. Any future influx of employment for the growth areas of the County is foreseen to occur with relatively uniform distribution and is expected to be homogeneous to a sufficient degree to have no material impact on the necessary distribution of the future housing supply and demand within growth areas of the County, when considering the governing criteria of proximity and accessibility of jobs.

The review of the above outlined considerations have led to the conclusion that the most equitable method available to determine Rockaway Township's fair share of the Morris County lower income housing obligation is a calculation proportionate simply to the ratio of the Townships growth area to that of the total growth area in Morris County. This method is acceptable not simply on the basis of data availability but also because its quantifiable and calculable elements can be expected to produce a sufficient degree of

TABLE 2
MORRIS COUNTY LAND USE BY MUNICIPALITY
AS DESIGNATED BY THE STATE DEVELOPMENT GUIDE PLAN

	Growth Area in Sq. Mi.	Limited Growth Area Sq. Mi.	Conserv. Area Sq. Mi.	Agricu. Area Sq. Mi.	Total Area Sq. Mi.
BOONTON	2.700	-	-	-	2.70
BOONTON TWP.	3.776	3.495	0.229	-	7.50
BUTLER	1.725	.075	-	-	1.80
CHATHAM BORO.	2.300	-	-	-	2.30
CHATHAM TWP.	4.603	-	4.397	-	9.00
CHESTER BORO.	-	1.620	-	-	1.62
CHESTER TWP.	-	28.680	-	-	28.68
DENVILLE	12.542	.258	-	-	12.80
DOVER	2.300	-	-	-	2.30
E. HANOVER	6.988	1.412	-	-	8.40
FLORHAM PARK	7.600	-	-	-	7.60
HANOVER TWP.	10.800	-	-	-	10.80
HARDING	4.528	.970	11.202	-	16.70
JEFFERSON	.149	35.870	8.281	-	44.30
KINNELON	1.481	15.074	3.145	-	19.70
LINCOLN PARK	4.039	1.532	1.429	-	7.00
MADISON	4.000	-	-	-	4.00
MENDHAM BORO.	-	6.700	-	-	6.70
MENDHAM TWP.	-	17.600	-	-	17.60
MINE HILL	2.800	-	-	-	2.80
MONTVILLE	8.039	8.384	1.877	-	18.30
MORRIS TWP.	12.365	2.241	1.194	-	15.80
MORRIS PLAINS	2.500	-	-	-	2.50
MORRISTOWN	2.000	-	-	-	2.00
MT. LAKES	3.000	-	-	-	3.00
MT. ARLINGTON	.838	1.862	-	-	2.70
MOUNT OLIVE	3.575	25.867	-	2.158	31.60
NETCONG	.800	-	-	-	.80
PARSIPPANY	21.931	-	3.369	-	25.30
PASSAIC	12.770	-	3.730	-	16.50
PEQUANNOCK	5.620	1.280	-	-	6.90
RANDOLPH	6.462	14.598	-	-	21.06
RIVERDALE	1.800	-	-	-	1.80
ROCKAWAY	2.020	-	-	-	2.02
ROCKAWAY TWP.	9.326	24.145	11.409	-	44.88
ROXBURY	15.426	5.574	-	-	21.00
VICTORY GARDENS	.140	-	-	-	0.14
WASHINGTON	-	20.308	-	24.792	45.10
WHARTON	2.000	-	-	-	2.00
TOTAL	182.943	217.545	50.262	26.950	477.70

Source: Municipal Land Areas are taken from "New Jersey County And Municipal Work Sheets", Department of Conservation And Economic Development
Breakdown by Municipality Prepared by Robert Catlin & Associates

precision for compliance with the mandates of Mt. Laurel II when applied to Rockaway Township.

For the purpose of determining the Township's fair share of the Morris County lower income housing obligation with this method, the various land use designations by the SDGP were tabulated for each of the 39 Morris County municipalities as shown on Table 2. This table reflects that of the 182.943 sq.mi. "growth area" of the County 9.326 sq.mi. or 5.1 percent falls in Rockaway Township. Applying this proportion of the County housing obligation, Rockaway Township's share is shown in Table 3.

TABLE 3
ROCKAWAY TOWNSHIP LOWER INCOME HOUSING NEED, 1990

	Lower Income Housing Need, 1990	
	Morris County	Rockaway Township
Low Income Need	4,865 Units	248 Units
Moderate Income Need	<u>2,994</u> Units	<u>153</u> Units
Total 1990 Housing Need	7,859 Units	401 Units

SECTION II - INDIGENOUS HOUSING NEED

In addition to accommodating in growth areas a fair share of the regional housing need, each municipality, according to the Mount Laurel II decision, is obligated to provide a realistic opportunity for housing its resident poor.

With the review of available alternate methodologies to determine the housing need of such resident poor population in Rockaway Township, it was acknowledged that there is ground to interpret resident, indigenous housing need as solely the function of housing dilapidation. This is implied by Federal and State housing programs designed to dispose of blighted conditions, and is specifically supported by studies of the Center for Urban Policy Research (Rutgers, The State University of N.J. 1983). The referenced Study entitled Mount Laurel II identifies financial considerations as relevant only to the determination of future housing needs. (See p.90).

"Income-constrained Mount Laurel households in 1980 living in sound (non-deteriorated) housing with rent-to-income ratios in excess of 25 percent, should they be part of households forming over the next two decades (from any age cohort, including sub-families), will be picked up as part of future demand. Income-constrained Mount Laurel households in 1980 living in deficient housing with rent-to-income ratios in excess of 25 percent, will be accounted for as a portion of existing housing-deficient demand."

"Finally, those income-constrained Mount Laurel households living in 1980 in sound housing, but whose rent-to-income ratios are in excess of 25 percent, are assumed to continue to occupy this housing at these costs. It is difficult to control for the quality of these units. We do know that many of those of Mount Laurel incomes who occupy

units costing more than one-fourth of their income are more spaciouly housed and own their units. One-third of those who occupy this space have one room more than those equivalent income groups living at less than 25 percent rent-to-income ratio, and one-half of those who paid more than \$300 in monthly occupancy costs in 1980, owned their own units. In addition, while costs are somewhat higher in this sound housing compared to those households who occupy deficient housing, it is still inexpensive relative to the costs of new housing."

Despite this simple methodology, suggested by the Rutgers Study which foretells a relatively moderate, more favorable final obligation for the Township, it was felt that a more conservative approach, implied by and modeled after that used by the Revised Statewide Housing Allocation Report for New Jersey prepared in 1978 by the N.J. Division of State and Regional Planning, will result in more credible conclusions and be deemed more appropriate by the Court. With the application of this more conservative approach the number of housing units necessary for the existing indigenous low-and moderate-income households is established as the composite of physical and financial need on the basis of the characteristics of the existing housing stock and the population as follows:

A. PHYSICAL NEED

The physical housing need is predicated on three characteristics of the housing stock in Rockaway Township:

- * Housing Vacancy Rates;
- * Overcrowded Housing and
- * Dilapidated Housing.

Overcrowded housing is defined as housing with more than one person per room, while the criteria used for minimum vacancy rates necessary to permit normal operation of the housing market are 1.5 percent for owner housing and 5.0 percent for rental housing. Information with respect to housing vacancy rates and overcrowded housing conditions is being furnished by the 1980 Census. In regard to the

condition of housing, the most recent reliable source is, "An Analysis Of Low-And Moderate-Income Housing Need In New Jersey," prepared in 1975 by the State Department of Community Affairs, since the 1980 Census did not record such housing data.

1. HOUSING VACANCY RATES

The first component considered for the determination of the physical need is the examination of vacancy rates in the Township. Table 4 shows the vacancy rates for owner and renter housing as recorded by the 1980 Census. The rate for owner housing at 1.49 percent meets the required minimum for that category and the Township's vacant rental housing stock produces a rate well above the required minimum of 5.0 percent.

**TABLE 4
HOUSING VACANCY RATE**

	<u>Owner Housing</u>	<u>Rental Housing</u>
Occupied	5,163	1,088
Vacant*	78	81
Total	5,241	1,169
Vacancy Rate	1.49%	6.93%

*Vacant For-Sale and vacant For-Rent units only

Source: U. S. Census of Population & Housing, 1980

2. OVERCROWDED HOUSING

Overcrowded housing constitutes an other element of the physical need. The 1980 Census enumerates occupied housing units by number of persons occupying rooms. As shown by Table 5, 6,169 of the Township's 6,251 occupied housing units had one person or less per room, 71 units had between 1.01 and 1.50 persons per room and 11 units were occupied by more than 1.51 persons per room. Those units occupied by more than 1 person per room are termed "overcrowded" and generate a need for 82 housing units.

**TABLE 5
OVERCROWDED HOUSING UNITS, 1980**

<u>Persons Per Room</u>	<u>Occupied Housing Units</u>
1.00 or Less	6,169
1.01 - 1.50	71
1.51 or More	11
Total	6,251

Source: U. S. Census of Population & Housing, 1980

3. DILAPIDATED HOUSING

The presence of substandard housing conditions represents the third factor in determining the present physical need. Units with critical defects requiring extensive repairs or demolition are termed dilapidated and comprise this category. Table 6 shows classes of deficient housing in the Township and indicates that 156 housing units were classified as dilapidated in the Township by the State Department of Community Affairs in 1975. Inasmuch as the 1980 Census did not survey physical housing conditions this, somewhat outdated, information must be used.

**TABLE 6
CONDITION OF HOUSING**

Deteriorated*	259 Units
Dilapidated*	156 Units
Lacking Plumbing**	123 ¹ Units

¹ Incomplete kitchen and/or bathroom facilities

Sources: *An Analysis Of Low- And Moderate Income Housing Need In New Jersey - N. J. Dept. of Community Affairs May 7, 1975

**U. S. Census of Population and Housing, 1980

4. THE TOTAL PRESENT PHYSICAL NEED

As reflected by the preceding Tables 4, 5 and 6, the indigenous housing need attributed to physical reasons totals 238 as follows:

**TABLE 7
TOTAL PHYSICAL NEED**

Insufficient Vacancy Rates	0 Units
Overcrowded Units	82 Units
<u>Dilapidated Units</u>	<u>156 Units</u>
Physical Need	238 Units

B. FINANCIAL NEED

A predominant component comprising the indigenous (present) housing need is generated by financial housing inadequacies consisting of low- and moderate-income renter households paying 25 percent or more of their incomes for rent. In order to establish the number of such households, levels of "low" and "moderate" household incomes must be determined. Low income households are defined as having incomes of not more than 50 percent of the median income prevailing in the area, while moderate incomes fall between 50 percent and 80 percent of the median income for the area. For the purpose of this analysis, the income levels for the Rockaway Township area were deemed representative by that of the Newark SMSA and suited for the fixing of the criteria for low and moderate income limits. As shown on Table 8, the median household income in the four-county region on the basis of 1980 U. S. Census information is \$20,643.

**TABLE 8
MEDIAN HOUSEHOLD INCOME IN THE NEWARK SMSA**

County	Number of Households	Median Income (\$)
Essex	300,782	16,186
Morris	131,820	26,626
Somerset	67,386	26,237
Union	177,973	21,625
<u>Total</u>	<u>677,943</u>	

Weighted SMSA Median Household Income \$20,643

On the basis of criteria used, annual household incomes of up to \$10,322 are classified as low, while annual household incomes between \$10,323 and \$16,514 are classified

as moderate.

TABLE 9
MEDIAN, LOW AND MODERATE INCOMES
IN THE FOUR-COUNTY REGION

1980 Median Household Income	\$20,643
Maximum "Low" Income @ 50% of Median	\$10,322
Maximum "Moderate" Income @ 80% of Median	\$16,514

Source: U. S. Census of Population and Housing.

The 1980 Census tabulates housing expenses of renter households as percentages of incomes in five categories as shown in Table 10. The rental housing expenses of low- and moderate-income households were computed on the basis of this tabulation. As shown in Table 11, in 1979 there were 146 low income households and 124 moderate income households in the Township paying more than 25 percent of their incomes for rent. The total of these households produce the indigenous financial housing need of 270 housing units.

TABLE 10
HOUSING EXPENSES AS PERCENTAGE OF INCOME OF
RENTER HOUSEHOLDS, 1979*

	Under \$5,000	\$5,000 To \$9,999	\$10,000 To \$14,999	\$15,000 To \$19,999	Over \$20,000
Under 25%	0	6	32	47	478
25% - 34%	0	6	52	57	51
35% or More	31	103	53	26	0
Total	31	115	137	130	529

*Exclusive of Category "Not Computed"

Source: U. S. Census of Population and Housing, 1980

**TABLE 11
RENTAL HOUSING EXPENSES OF
LOW- AND MODERATE INCOME HOUSEHOLDS**

Household Income	% Of Income Paid For Rent			
	25% - 34%	35% or More	Total	Households
Under \$10,322 (Low Income)	9	137	146	54%
\$10,323-\$16,514 (Moderate Income)	66	58	124	46%
Financial Need	75	195	270	100%

C. TOTAL INDIGENOUS (PRESENT) HOUSING NEED

The total indigenous (present) housing obligation of Rockaway Township is the sum of the physical need and the financial need as discussed above. The physical need of 238 units and the financial need of 270 units produce a total of 508 housing units. Obviously, however, there exists an overlap between overcrowded and dilapidated units as well as between both these and the housing need generated by financial need. This overlap was estimated at 25 percent of the combined physical and financial need resulting in a total indigenous housing need of 381 housing units in Rockaway Township as shown by Table 12.

**TABLE 12
AGGREGATE INDIGENOUS NEED**

Physical Need (A)	238 Units
Financial Need (B)	270 Units
<u>Total</u>	<u>508 Units</u>
Overlap @ 25%	127 Units
<u>Units Required For Present Need</u>	<u>381 Units</u>

On the basis of financial conditions in the Township, the total indigenous (present) housing need of 381 units is apportioned as follows:

**TABLE 13
ALLOCATION OF PRESENT NEED
BY INCOME**

Low Income Need 54%	206 Units
Moderate Income Need 46%	175 Units
<u>Total Indigenous Need</u>	<u>381 Units</u>

D. SCHEDULING

Although it is recognized that the demand for housing by the Township's resident poor is an existing, present need, it must also be acknowledged that provisions for such considerable outstanding need cannot, for practical reasons, be satisfied overnight. Due to these practical constraints, it is felt reasonable to assume that the indigenous housing need may be provided for in Rockaway Township by 1990.

SECTION III - DISTRIBUTION OF THE AGGREGATE HOUSING ALLOCATION

A. TOTAL HOUSING NEED

The aggregate housing obligation of Rockaway Township is the product of its regional share of 401 housing units as reviewed in Section I and its indigenous need of 381 units discussed in Section II of this Study amounting to 782 units as shown by Table 14.

**TABLE 14
AGGREGATE HOUSING ALLOCATION 1990
ROCKAWAY TOWNSHIP**

	Low Income	Moderate Income	Total
Regional Need	248	153	401
Indigenous Need	206	175	381
Aggregate 1990 Housing Need	454	328	782

B. DISTRIBUTION OF HOUSING NEED

An important consideration in satisfying the housing needs of low- and moderate-income households is household size, in order that provisions can be made for appropriately-sized housing units. It is possible to roughly estimate the size of low- and moderate-income households by utilizing the breakdown of the entire population involved, as reported by the 1980 U. S. Census. In determining the distribution of housing needs by household size for the Township's regional share, the breakdown of family size for all counties in the housing region, was used. This regional distribution is shown on Table 15. In determining the distribution of the Township's indigenous housing need, the breakdown of family size given by the 1980 Census for Rockaway Township was applied as shown by Table 16.

The aggregate housing allocation for Rockaway Township providing for its regional share as well as the resident poor by breakdown of household sizes to the year 1990 is shown on Table 17.

TABLE 15
REGIONAL LOW & MODERATE INCOME
DISTRIBUTION OF HOUSING NEEDS
BY HOUSEHOLD SIZE
TOWNSHIP OF ROCKAWAY

Household Size	1990
<hr/>	
Low Income	
1 Person	53
2 Persons	72
3 Persons	45
4 Persons	41
5 Persons	21
6 or More Persons	16
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Sub Total	248
Moderate Income	
1 Person	33
2 Persons	44
3 Persons	28
4 Persons	25
5 Persons	13
6 or More Persons	10
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Sub Total	153
Combined Low & Mod. Income	
1 Person	86
2 Persons	116
3 Persons	73
4 Persons	66
5 Persons	34
6 or More Persons	26
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TOTAL	401

TABLE 16
INDIGENOUS LOW & MODERATE INCOME
DISTRIBUTION OF HOUSING NEEDS BY HOUSEHOLD SIZE
TOWNSHIP OF ROCKAWAY

Household Size	1990
<hr/>	
Low Income	
1 Person	22
2 Persons	58
3 Persons	41
4 Persons	51
5 Persons	22
6 or More Persons	12
<hr/>	
Sub Total	206
Moderate Income	
1 Person	19
2 Persons	49
3 Persons	35
4 Persons	44
5 Persons	18
6 or More Persons	10
<hr/>	
Sub Total	175
Combined Low & Mod. Income	
1 Person	41
2 Persons	107
3 Persons	76
4 Persons	95
5 Persons	40
6 or More Persons	22
<hr/>	
TOTAL	381

TABLE 17
AGGREGATE LOW & MODERATE INCOME
DISTRIBUTION OF HOUSING NEEDS BY HOUSEHOLD SIZE
TOWNSHIP OF ROCKAWAY

Household Size	1990
<hr/>	
Low Income	
1 Person	75
2 Persons	130
3 Persons	86
4 Persons	92
5 Persons	43
6 or More Persons	28
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Sub Total	454
Moderate Income	
1 Person	52
2 Persons	93
3 Persons	63
4 Persons	69
5 Persons	31
6 or More Persons	20
<hr/>	
Sub Total	328
Combined Low & Mod. Income	
1 Person	127
2 Persons	223
3 Persons	149
4 Persons	161
5 Persons	74
6 or More Persons	48
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TOTAL	782

SUMMARY AND CONCLUSIONS

The methodology used in establishing a reasonable housing allocation for Rockaway Township considers two factors as mandated by the Mt. Laurel II decision. The first is to establish a fair share of low and moderate income housing units for the region. The second is to establish adequate housing for the indigenous poor.

It has been determined that Rockaway Township is part of the Newark SMSA region as established in the 1980 Federal Census. This SMSA region is made up of four counties, namely, Essex, Union, Morris and Somerset. David Zimmerman, a professional planner, has been retained by the defendant municipalities to quantify Morris County's fair share of low and moderate income housing units as part of the SMSA region. He has determined that 7,859 housing units will be needed for Morris County's share.

There are 9.326 square miles of land in Rockaway Township classified as "growth area" by the State Development Guide Plan. There are 182.943 square miles of land in Morris County that are located in the "growth area" as set forth in the State Development Guide Plan. Rockaway Township's growth area represents 5.1 percent of Morris County's growth area. Using this same proportion, Rockaway Township's fair share of the region's obligation is 401 units.

It has also been computed that Rockaway Township should provide for 381 additional low and moderate income housing units for its indigenous poor. The Township's total allocation, therefore, is 782 housing units by 1990. Since long range projections are always subject to debate and are necessarily predicated upon certain basic assumptions, it is suggested that zoning measures in the Township be designed to accommodate the total need for 1990 then reexamine this need periodically to see if the need will increase or decrease.

This report deals only with determining the magnitude of Rockaway Township's obligation of providing low and moderate income housing within the Township. Once this number has been determined, a zoning policy will have to be developed that will hopefully accommodate this number.

As of this writing, the Planning Board of the Township of Rockaway is nearing the completion of a reexamination and updating of the municipal master plan. A very important integral part of this master plan update is to map the existing development and zoning pattern as well as all environmental constraints, including:

- . Excessive Slopes
- . Wetlands
- . Septic Limitations
- . Hydrologic Soil Groups
- . Flood Plains
- . Abandoned Mines
- . Seasonal High Water Table
- . Primary Aquifers

Several of these constraints were mapped at the time the Public Advocate instituted the Fair Housing Litigation in 1979. Each of these constraints will be considered in the establishment of a zoning policy, in the master plan, to accommodate the Township's fair share obligation. It is possible that, if the only way to provide for Rockaway Township's housing allocation is to zone for five times this allocation just so a 20% "set aside" can be obtained, the vacant, developable land available in the Township and suitable for higher intensity use without serious environmental impact may not be adequate for the purpose.

Rockaway Township has the obligation, as mandated by the Supreme Court in the Mt. Laurel II decision, to provide for 782 low and moderate income housing units. The Master Plan recognizes this obligation and will include land use proposals to satisfy the obligation within the limits of its ability.