Planner's Report : Garfield & Company vs. Township of
    Cranbury
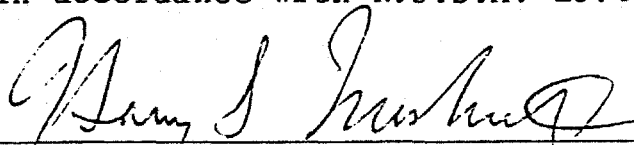
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Planner's Report

GARFIELD & COMPANY VS. TOWNSHIP OF CRANBURY

February 6, 1984

The original of this report was signed and
sealed in accordance with N.J.S.A. 13:41-1.3.

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Harvey S. Moskowitz, P.P. #12

Planner's Report

GARFIELD & COMPANY VS. TOWNSHIP OF CRANBURY

Introduction

The Mt. Laurel II decision[1] requires all municipalities in New Jersey to provide, through their land use regulations, a realistic opportunity for the construction of low and moderate income housing. Municipalities in growth areas as defined in the State Development Guide Plan must provide for their fair share of the region's prospective low and moderate income housing need. All municipalities must provide for their existing indigenous housing need (defined as dilapidated or overcrowded housing) except where this need represents a disproportionate share in which case all municipalities classified as "growth area" municipalities in that region must share the burden (92 NJ at 243).

Since the bulk of Cranbury Township's 13.38 square mile area is located in a growth area (see map on following page), the Township's housing responsibilities include provision for its fair share of the region's prospective low and moderate income housing need, its indigenous housing need, as well as a fair share of the region's present low and moderate income housing need. A separate report prepared by Richard T. Coppola &

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[1]South Burlington County NAACP v. Township of Mt. Laurel, 92 NJ 158, 456 A.2d 390 (1983).

8. Both prospective and present need for lower income housing
in Cranbury will be 655 units by 1990.

Determination of Region

The Mt. Laurel II decision said:

...the fair share questions will be confined to the
allocation issue...and, in relatively short time,
abjudication by the three judges should end most
disputes over region and regional need. (92 NJ at 255)

Unfortunately, this time has not yet arrived and the question of
how to determine the fair share region is still very much
undecided. An examination of several experts' reports in various
Mt. Laurel II cases shows the following:

Associates reviews the Township's existing land development regulations and concludes that these regulations do not permit the construction of low and moderate income housing. This report analyzes Cranbury's housing region, discusses a methodology for projecting the future housing need and Cranbury's fair share of that need, and presents Cranbury's indigenous obligation including its fair share of the region's present need.

Summary of Findings

1. Cranbury Township lies within the growth area in the <u>State Development Guide Plan</u>.

2. Cranbury's Land Development Ordinance contains provisions which effectively prohibit the construction of low or moderate income housing (analysis in separate report by Richard T. Coppola & Associates).

3. The prospective fair share region of which Cranbury Township is part consists of a 45-minute commutershed and contains 1,818,526 persons, 99 municipalities and over 1,276 square miles.

4. The number of new households which will be required by 1990 in the Cranbury region is 89,422.

5. Of this total, 943 will be Cranbury's share.

6. Using the State average of 39.6 percent low or moderate income households, Cranbury's future low and moderate income housing need will be 372 households.

7. Cranbury's indigenous and present need share is calculated at 282 units.

Expert	Report	Region
1-Clarke & Caton	Branchburg Twp. Fair Share Housing Report	Region II from the State Housing Allocation Report plus Hunterdon County.[2]
2-Clarke & Caton	Mahwah Twp. Fair Share HousingReport	Region II from the State Housing Allocation Report.
3-Mallach, Alan	Urban League of Greater New Brunswick vs. Borough of Carteret, et al.	Region II from the State Housing Allocation Report.
4-Abeles Schwartz Asscciates	A Fair Share Housing Allocation for Ten Municipalities in Morris County.	Region II from the State Housing Allocation Report.
5-Kasler & Assoc.	Norwood Fair Share Housing Study	30-minute commuter-shed
6-Moskowitz, Harvey S.	Morris Twp. Fair Share Study and others	30-minute commuter-shed
7-Oross Assoc.	Fair Share Study for Warren Twp.	45-minute commuter-shed
8-Carla L. Lerman	Urban League ofGreater New Brunswick et al., vs. Borough of Carteret, et al.	13-county metropolitan area divided into south and north sub-regions.
9-APA Amicus Curiae brief	Urban League of Greater New Brunswick vs. Carteret	30-45 minute commutershed
10-Rutgers Report	Mt. Laurel II: Challenge & Delivery of Low Cost Housing	Primary Metropolitan Statistical Areas (PMSA) plus "solo" counties where appropriate

[2]Region II consists of eight counties: Bergen, Essex, Hudson, Middlesex, Morris, Passaic, Somerset and Union.

From an examination of the above documents and others by the same experts, most regional definitions appear to take one of two general directions: the Housing Allocation Report region (eight counties) or commutershed. The rationale for using the Housing Allocation Report Region II designation is best described by Mallach[3] (footnotes excluded from quoted passages):

a. Consistency: A clearly stated objective in Mt. Laurel II is to arrive at a consistent regional pattern for each section of the state, and, ultimately, for the state as a whole, in order to obviate the need to define region and regional need separately in each case (92 NJ at 245-255)...A region based on a 'journey to work' radius around a particular municipality would be intrinsically in violation of this standard, and would result in 567 separate, unique, mutually exclusive, regions around the state.

b. Scale: A region must be large enough, and diverse enough to provide both that the full extent of lower income housing need is identified, and can be satisfied within the region. Such a standard requires a region in which there is a balance of counties in which needs exceed resources...

c. Housing Market Area: As the court stated in Mt. Laurel II, accepting a position initially set forth in Madison, the region is the area "from which the prospective population of the municipality would substantially be drawn, in the absence of exclusionary zoning". The prospective population at issue is, in essence, the population of the core - the area in which need for lower income housing exceeds the means of providing it...

d. Regional Planning: For similar reasons, these counties have been treated as a region by regional planning agencies, and by the state. They make up the region, less its 'outer ring' defined by the Regional Plan Association; they are treated as a common Labor Market Area by the New Jersey Department of Labor; and, with the addition of Monmouth County, are treated as a region by the former Tri-State Regional Planning Commission...

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[3]Expert Report on Mount Laurel II Issues in Urban Leauge of Greater New Brunswick vs. Borough of Carteret, et al., December 1983, pp. 3-5.

Kasler, on the other hand, makes a strong defense of the commutershed concept:[4]

> We favor the concept of journey-to-work as the basis for the determination of region for the purposes of Mount Laurel II litigation and planning for regional housing need. We base this recommendation upon the following:
>
> 1. Housing and planning literature including studies by David Listokin and earlier studies by the American Society of Planning Officials support journey-to-work for allocation purposes.
>
> 2. Journey-to-work planning is the most appropriate region for these purposes and represents the most true-to-life condition in the marketplace.
>
> 3. Other regions, such as SMSA areas, counties and other area delineations are primarily "statistical regions" and generally do not represent actual or equitable conditions.
>
> 4. The American Planning Association, American Institute of Certified Planners, filed an Amicus brief with regard to the Mount Laurel II case, in which journey-to-work is proposed as a recognized available approach in defining fair-share housing regions.

As we see it, the major problem and the reason for the divergent views on what constitutes an appropriate region is the attempt to fulfill the Court's objective to settle the question of region early in the Mt. Laurel II litigation. In our opinion, it may not be possible to achieve this notable objective because of the contradictory origins and basis of prospective share and present need. One, prospective need, is geared to the

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[4]Malcolm Kasler & Associates, _Norwood Fair Share Housing Study_, _Hackensack, N.J._, August 26, 1983, p. 11.

relationship of future jobs and residences -- the commutershed. The other, present need, must include both the problem and solutions; in other words, urban cities with a "surplus" of dilapidated and overcrowded housing and growth area municipalities with sufficient resources to accommodate the reallocation of this surplus.

The question of appropriate region was discussed extensively in the AMG and Timber vs. Warren Township Mt. Laurel cases (two separate cases consolidated). The Court requested the three experts for plaintiffs and defendant to explore the possibility of coming up with a mutually agreeable region. After careful consideration, it was agreed that two regions were needed; a prospective share region based on a commutershed, and a present need region based on fixed boundaries. The reasoning and basis for the recommendation is contained in excerpts from the draft memorandum submitted to the Court and quoted below[5] (footnotes omitted):

Prospective Fair Share Region

It is the experts' opinion that the most appropriate region for the determination of prospective housing need for a given municipality is a forty-five (45) minute commuting region (commutershed) surrounding the particular municipality.

The use of the commutershed for the determination of the prospective housing need is not only reasonable under various Court decisions but well grounded in the planning literature. It also has a sound planning foundation in terms of orienting new housing construction near employment opportunities. The 45-minute commute was somewhat higher than the median

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[5]The language in the final memorandum differed slightly from the draft. Report prepared by John Chadwick IV, Richard T. Coppola, and Harvey S. Moskowitz, to Honorable Eugene D.

travel time for all working residents in Warren Town-
ship (approximately 30 minutes) but included approxi-
mately 85 percent of the employed residents.

The most obvious question with respect to the use of a
commutershed to determine the prospective fair share is
whether or not there is overlap and duplication when a
fair share analysis is prepared for a second
municipality within the same commutershed as the first
municipality.

The question of duplication is a real one until one
realizes that the essential goal and objective of the
calculation is to come up with a prospective fair share
allocation for a given municipality. The regional
determination of the region's total prospective fair
share is only an intermediate step in arriving at a mu-
nicipality's fair share allocation. Once that munici-
pality's fair share has been determined, the regional
figure is no longer needed, and a new calculation would
have to be undertaken for any other municipality based
on the commutershed principle. We liken the use of the
prospective need figure for the commutershed similar to
scaffolding that one would erect in order to construct
a structure or house. Once the house is completed, the
scaffolding is dismantled and may be used to build
other structures or houses. In our opinion, the
prospective share region is only valid for a single mu-
nicipality. It serves no purpose to attempt to "fit"
all municipalities into a single region and to use this
region for prospective, present and indigenous need.

We are not concerned over the fact that the Supreme
Court suggested that once a region is established, that
region would hold (in terms of prospective need) for
all municipalities within that region, with the
possible exception of those at the fringes. This was
stated as follows:

> The ultimate outcome of such litigation in
> most cases shall be a determination by the
> Court of a precise region, a precise regional
> present and prospective need, and a precise
> determination of the present and prospective
> need that the municipality is obliged to
> design its ordinance to meet. (92 NJ 158 at
> 257)

Serpentelli, Fair Share Computation: Regional Definitions;
Prospective, Present, and Indigenous Need; Fair Share
Methodology, January 19, 1984, pp. 2-7.

However, in analyzing the problem, we respectfully suggest that because of the very nature of prospective need, being keyed to jobs and community, such a precise regional determination is difficult, if not impossible, to establish for more than one municipality. Indeed, the other experts retained by Mt. Laurel courts have come up with a variety of regions (see Lerman and Caton, for example) and other experts on behalf of plaintiffs as well as defendants in several cases, have failed to agree on a single region for prospective need.

It is important to note that <u>municipal</u> zoning and land use regulations allow the construction of housing which meet the Mt. Laurel II mandate. Regions do not adopt such regulations. Consequently, it is our opinion that the inability to come up with a single prospective fair share region covering many municipalities is of little import, given the solid legal, planning and historical basis on the use of the commutershed for prospective fair share analysis.

Present Fair Share Region

There are problems in utilizing the commutershed housing region for the allocation of present housing need. Before indicating why, it is necessary to analyze what is meant by present need as set forth in Mt. Laurel II. The decision suggests that present need consists of (the dilapidated and overcrowded housing) in all municipalities, and for municipalities in growth areas, a reallocation or redistribution of some of (this housing from municipalities with a disproportionate share of lower income housing (such as urban core cities) to those growth area municipalities which do not have a disproportionate share (such as suburban municipalities). This is made clear in the decision, as follows:

> Municipalities located in "growth areas" may of course have an obligation to meet the present need of the region that goes far beyond that generated in the municipality itself; there may be some municipalities, however, in growth areas, where a portion of the region's present need generated by that municipality far exceeds the municipality's fair share. A portion of the region's present need that must be addressed by municipalities in growth areas will depend, then, on conventional fair share analysis, some municipality's fair share being more than the

> present need generated within the municipality
> and in some cases, less. (92 NJ 158 at 243)

The reallocation principle is further enunciated, as follows:

> In other words, each municipality must provide
> a realistic opportunity for decent housing for
> its indigenous poor, except where they
> represent a disproportionately large segment
> of the population as compared with the rest of
> the region. This is the case in many of our
> urban areas. (92 NJ 158 at 215)

The principal reason, then, for not using the commutershed region for present need is that it may not include a wide enough range of municipalities to allow for redistribution or reallocation. In other words, a present need region should have both the "problem" municipalities and municipalities with sufficient vacant developable land to accommodate the redistributed housing units. A second reason is that the present need represents an existing need so that it is possible to use existing data. It is based on existing exclusionary practices which can be pinpointed within specific boundaries. They are not future commuter oriented.

While it would be advantageous to have a fixed region for all computational purposes as suggested by "Mt. Laurel II," we repeat our opinion that it is particularly inappropriate for the calculation of present housing need for the reasons heretofore stated.

As a result of our discussions, the State was divided into six (6) "present need" regions, as follows...

   I.   Sussex and Warren
  II.   Passaic, Bergen, Hudson, Essex, Morris, Union,
       Somerset, Hunterdon and Middlesex;
 III.   Mercer and Burlington;
  IV.   Monmouth and Ocean;
   V.   Camden, Gloucester and Salem;
  VI.   Atlantic, Cumberland and Cape May.

...In each of the regions there were central cities with significant housing need and municipalities located in growth areas with sufficient vacant land to accommodate additional growth as part of the reallocation process.

The Cranbury Region

Based on the above explanation, the Cranbury fair share region is a 45-minute commutershed as indicated on the map on the following page. (See appendix for list of municipalities and 1982 population.) The region consists of 1,276 square miles, 99 municipalities, and contains 1,818,526 population (1982).

The present need region consists of the nine counties of Passaic, Bergen, Hudson, Essex, Morris, Union, Somerset, Hunterdon and Middlesex and shown on Map 2 on the following page. This region is coterminous with Caton's region in his Branchburg report[6] and consists of the Housing Allocation Report Region II (eight county region) plus Hunterdon County.

Regional Need

The Warren Township case memo also focused on fair share methodology including prospective regional need. The prospective regional need requires an estimate of the number of new households in the region at some future date, generally agreed upon as 1990.[7] The memo suggested that there were a number of acceptable methods which may be used to estimate future households. These methods include:

a. Projecting past household formation in the region to the target date.

b. Projecting population growth and then estimating number of households by dividing by estimated future household size;

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[6]Clarke & Caton, Branchburg Township's Fair Share Housing Report, November 1983.

[7]Most experts agree that 1990 is an appropriate target date since it (a) is far enough in the future to make a meaningful

CRANBURY TOWNSHIP
HOUSING REGION

(45 Minute Commutershed)
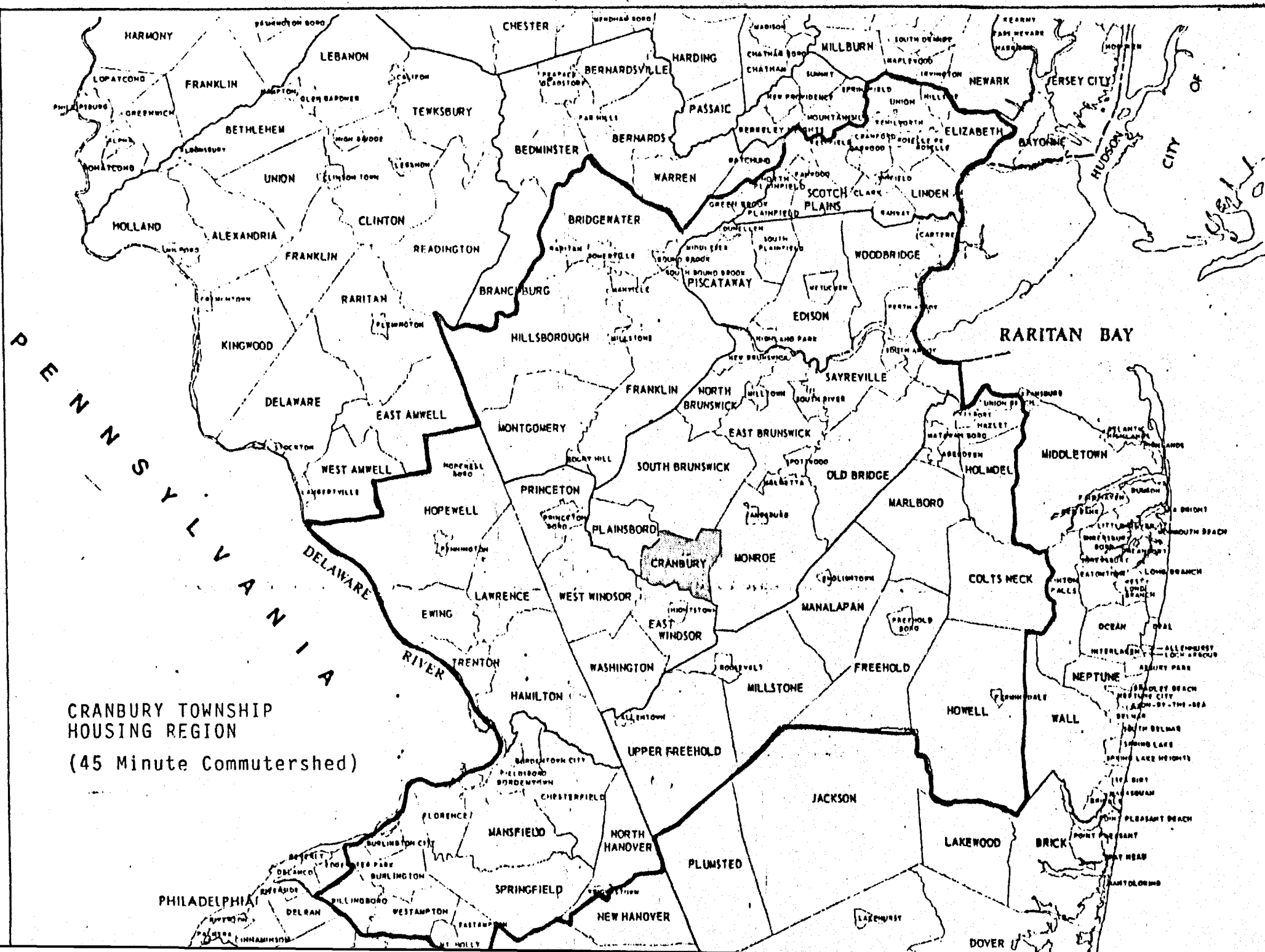
c. Projecting previous employment growth and dividing by household-to-job ratio to arrive at a future household figure;

d. Projecting age cohorts and correlating that with household formation rates through the use of standard tables.

Each method has advantages and disadvantages. Using combinations of several methods provides a useful check and ensures that local anomolies with respect to any one factor do not prejudice the result. For purposes of this analysis, we have projected future households based on the previous 1960 through 1980 experience and job formation correlated with the 1980 job-to-household ratios. Both figures were averaged to give us an estimated 1990 household figure of 85,983. Adding 4 percent for vacances and losses, the 1990 estimated household figure is 89,422.

a. Projecting future households based on 1960 to 1980 experience:

1980 households	601,742
1960 "	405,523
	196,219 or 9,811/year
1980-1990 projection:	699,852
1980-1990 increase:	98,110

impact on the problem; (b) close enough to assure some accuracy with respect to projections; (c) coincides with the six-year review of master plans mandated in the Municipal Land Use Law; and (d) the six-year period is usually the length of capital improvements programs, enabling inclusion of needed infrastructure improvements in current programs.

b. Projecting new jobs from 1972 to 1980 and using jobs-to-household ratio to estimate future households:

	Jobs
1980	655,345
1990	585,215
	70,130

	Jobs	Change From Previous Year
1972	585,215	
1980	655,345	+70,130
1990	729,201	+73,856

The 73,856 estimated new jobs figure is then divided by a household-to-jobs ratio to give us an estimate of new households. While the previously mentioned joint memorandum from Coppola, Chadwick and Moskowitz suggested a ratio of 0.759 jobs-to-household ratio, further study suggests a much higher figure. For one thing, the 0.759 was based on 1970 and 1980 employment figures. The 1970 job figures are not comparable to 1980 because workers in non-profit organization (mostly hospitals) came under the category of "covered employees" in 1972. In addition, the trend in New Jersey appears to be one of slight job growth but increasing household formation. Comparing 1972 and 1980 household and jobs in the State, we find the following:

	Jobs	Households	Household to Jobs Ratio
1980	2,530,556	2,548,225	1.007
1972	2,243,598	2,349,658	1.047

Since the ratio is approximately equal, the job formation figure of 73,856 would be a fair estimate of the number of new households.

The Allocation Model

What percentage of the 89,422 new households should be low and moderate and how much of these is Cranbury's fair share? Answering the latter question first, a number of models have been developed using a variety of factors either singly or together to determine the local allocation. All relate the local percentage of the specific factor to that of the region. They include growth area, percentage population, vacant developable land, existing employment, future employment, and employment growth. The Rutgers study suggested four factors be used in allocation models: employment growth, vacant developable land, per capita ratables, and subsidized housing production.

Given the major emphasis of the Mt. Laurel II decision on employment and housing, and the commutershed basis for the fair share region, it is our opinion that the allocation model should be primarily employment oriented. Vacant developable land, or more specifically, vacant developable land in growth areas, is also a valid factor except that the only available consistent figures are from the 1978 State Housing Allocation Report which used 1972 aerial photographs. The material is so far out of date that its use would result in gross errors.

The two employment factors recommended for use is percentage of existing employment (present and future) and employment growth, existing and future. The former presents a picture of the community's existing and projected land develop-

ment policies and the latter applies a regional perspective to local trends. In Cranbury, the model produces the following household demand picture:

Local Employment as a Percentage of Region

	Cranbury	Region	Percent of Region
1980 employment	3,273	665,345	0.492
1990 "	4,499	729,201	0.617
			1.109
	Average:		0.555

Local Employment Growth as a Percentage of Region's

	1972	1982	Difference	Percent
Cranbury	2,774	3,273	957	
Region	585,215	665,209	79,994	1.196

	1982	1990	Difference	Percent
Cranbury	3,273	4,499	1,226	
Region	665,209	729,201	63,992	1.916
		Average:		1.556%

Averaging the two figures gives us:

$$\frac{1.556 + .555}{2} = 1.055 \text{ percent}$$

When the 1.055 is applied to the future household need of 89,422, we find Cranbury's allocation is 943 households. Using the statewide average of 39.4 percent low and moderate income, Cranbury's future households should be 372 low and moderate income.[8]

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[8]Low income is defined as 50 percent or less of the region's median family income and moderate income, 50 to 80 percent.

Present Need

Cranbury's present need consists of its present indigenous need and a reallocation factor from other municipalities which have substantial concentrations of overcrowded and dilapidated housing. Each category is discussed separately.

a. Indigenous need. Indigenous need consists of the municipality's dilapidated or overcrowded housing. Overcrowding data (more than 1.01 persons/unit) is from the 1980 Census. Unfortunately, the Census does not have a comparable figure for dilapidated housing and "surrogate" measures must be used. These are occupied units lacking central heating and units with inadequate plumbing.[9] Another factor included as part of the indigenous need is financial -- lower income renter households paying more than 28 percent of their income for shelter.[10]

For Cranbury, these factors are as follows:

Overcrowding: 11
Inadequate central heating: 9
Inadequate plumbing: 10

                                    30 units

The financial component, based on a maximum of 2 percent of income for housing, is applied only to renter units in Cranbury. This is based on a feeling that owners paying mor

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[9]Heating deficiencies are noted in Table 35, Sheet XII, STF-3 adjusted to eliminate room heaters with flues. Plumbing deficiencies data are from Table 38, Sheet XII, STF-3.

[10]From Table 30, Sheet XI, STF-3 and interpolated

than 28 percent of their gross income for shelter costs do so by choice and that the dwelling unit itself represents, in most cases, a significant asset. In other words, if it were sold, the owners would probably not fit into the lower income category. In Cranbury, 21 rental units are occupied by lower income households paying more than 28 percent of their income for rent. However, since there may be some overlap with existing indigenous need, this is discounted by 50 percent to 10 units.

b. <u>Reallocation</u>. The Mt. Laurel II decision stated that municipalities in growth areas such as Cranbury have an additional responsibility to accept the lower income housing from those municipalities which have a disproportionate share. How the excess is reallocated is still subject to some discussion. (See Caton, Mallach and Lerman expert reports, for example.)[11] Mallach's method, which we propose to use with a somewhat different allocation model and nine-county region, employs a two-phased approach with the percentage of substandard housing in the region as a basis for reallocation. He initially reallocates the indigenous need in those counties with more than the region's average, using the same allocation model applied to prospective need.
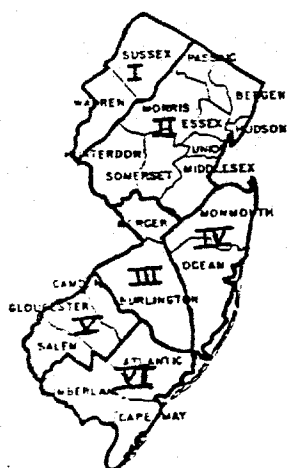
The second phase calls for a reallocation of Middlesex County's indigenous need and more specifically, the excess from the municipalities of New Brunswick, Perth Amboy, and Helmetta

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[11]Clarke & Caton, <u>Fair Share Housing Report</u>, November 1983; Alan Mallach, <u>Expert Report on Mt. Laurel II Issues in Urban League of Greater New Brunswick vs. Borough of Cartaret, et. al</u>, December 1983; Carla L. Lerman, P.P., <u>Fair Share Allocation</u>

PRESENT NEED REGIONS
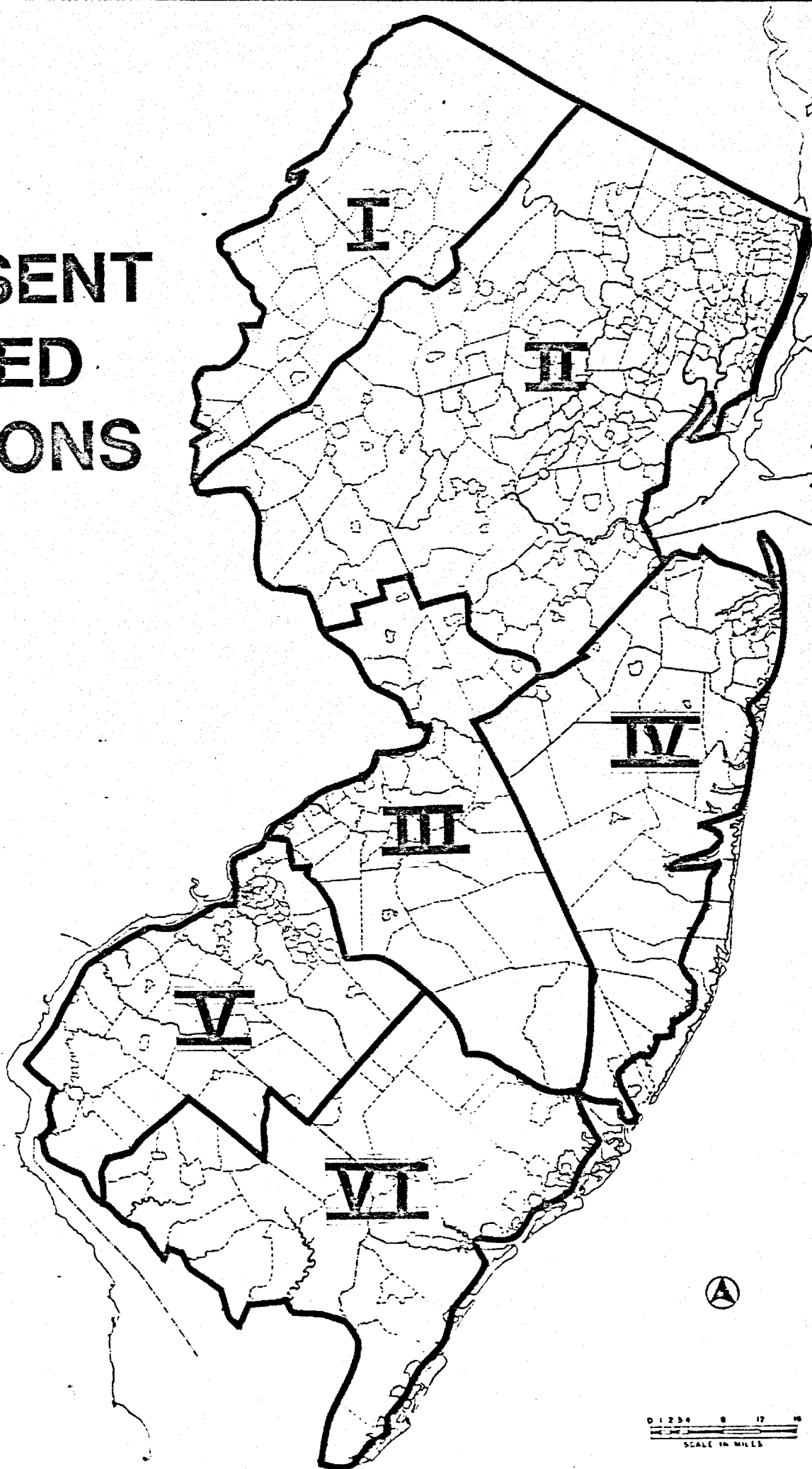
I

II

IV

III

V

VI

COUNTY KEY MAP

SUSSEX
PASSAIC
WARREN
MORRIS
BERGEN
ESSEX
HUDSON
HUNTERDON
UNION
SOMERSET
MIDDLESEX
MERCER
MONMOUTH
CAMDEN
IV
OCEAN
III
BURLINGTON
GLOUCESTER
V
SALEM
ATLANTIC
CUMBERLAND
VI
CAPE MAY

SCALE IN MILES
0 1 2 3 4   8   12   16

which have more indigenous housing than the regional average.[12]

Table 1 uses a nine-county present need region. It indicates that the percentage of indigenous housing in the region is 6.4 percent. However, only three counties, Essex, Hudson and Passaic, are in excess of that figure. Their excess, or 21,476 units, is reallocated using the same model (employment and employment growth, present and future) used for the prospective need (1.055 X 21,476). This results in first phase present need of 227 units.

Report, Urban League of Greater New Brunswick, et al., vs. Borough of Cartaret, et al., November 1983.

[12]Mallach, pp. 23 and 30, for reasons for intra-county reallocation.

Table 1

Reallocation of Indigenous Need – Nine-County Present Need Region

	Occupied Dwelling Units	Indigenous[b] Housing Need (dwelling units)	Percent of County Housing Stock	Percent of Need	Reallocation Figure
Bergen Co.	300,410	9,780	3.3	3.3	0
Essex Co.	300,303	26,977	9.0	9.0	7,758
Hudson Co.	207,857	23,382	11.2	11.2	10,579
Middlesex Co.	196,708	7,892	4.0	4.0	0
Morris Co.[a]	123,635	6,034	4.8	4.9	0
Passaic Co.[a]	149,846	12,821	8.4	8.6	3,139
Somerset Co.[a]	65,126	1,820	2.8	2.8	0
Union Co.	177,973	8,514	4.8	4.8	0
Hunterdon Co.[a]	13,187	514	3.9	3.9	0
Total:	1,535,045	97,734		6.4%	21,476

a. Growth areas only:
   Morris Co.: Excluding Chester Borough and Township, Mendham Borough and Township, Washington Township.
   Passaic Co.: Excluding Ringwood Borough.
   Somerset Co.: Excluding Montgomery Township, Rocky Hill Borough.
   Hunterdon Co.: Including only Clinton Town and Township, Flemington, High Bridge, Lebanon Borough, Raritan Township, Readington Township, Tewksbury Township.

b. Includes units lacking plumbing, adequate heating, and overcrowded units occupied by lower income families.

In the second phase of the reallocation of present need, the excess indigenous units from New Brunswick (489), Perth Amboy (529), and Helmetta (5) are reallocated based on the same model used in the prospective and first phase present need reallocation computations but as applied to Middlesex County as opposed to the nine-county region. The result is second phase present need reallocation of 15 units (1.445 percent X 1,023 units).

In summary then, the indigenous and present need figures

for Cranbury are as follows;

Overcrowded and dilapidated housing in Cranbury:	30 units
Financial need	10 "
Present need reallocation (region)	227 "
Present need reallocation (county)	15
Total:	282 units

A P P E N D I X

Municipalities in Cranbury Township Housing Region

and Estimated 1982 Population

(from N.J. Department of Labor & Industry)

BURLINGTON COUNTY

Bordentown City	4,444
Bordentown Township	7,215
Burlington City	10,641
Burlington Township	11,616
Chesterfield	4,177
Eastampton	3,825
Fieldsboro	599
Florence	9,136
Mansfield	2,560
Mount Holly	10,763
North Hanover	9,212
Springfield	2,744
Westampton	3,533
Willingboro	40,042
Wrightstown	3,203
	123,710

MONMOUTH COUNTY

Aberdeen	17,783
Allentown	1,937
Colts Neck	8,012
Englishtown	972
Farmingdale	1,336
Freehold Boro	10,017
Freehold Township	19,459
Hazlet	22,971
Holmdel	8,772
Howell	26,702
Keyport	7,305
Manalapan	21,175
Marlboro	19,461
Matawan	8,796
Millstone	4,048
Roosevelt	825
Union Beach	6,300
Upper Freehold	2,788
	188,659

SOMERSET COUNTY

Bound Brook	9,613
Bridgewater	29,067
Franklin	32,342
Greenbrook	4,667
Hillsborough	20,681
Manville	11,241
Millstone	523
Montgomery	7,427
North Plainfield	18,911
Raritan	6,150
Rocky Hill	711
Somerville	11,850
South Bound Brook	4,303
	157,486

<u>1982 Population</u>

UNION COUNTY
Clark Township	16,732
Cranford Township	24,535
Elizabeth City	106,804
Fanwood Borough	7,760
Hillside Township	21,386
Kenilworth Borough	8,239
Linden City	37,784
Plainfield City	45,329
Rahway City	26,750
Roselle Borough	20,587
Roselle Park Borough	13,357
Scotch Plains Township	21,196
Union Township	50,899
Westfield Town	30,562
Winfield Township	1,781
	433,701

MERCER COUNTY
East Windsor Township	21,402
Ewing Township	34,655
Hamilton Township	83,221
Hightstown Borough	4,548
Hopewell Borough	1,984
Hopewell Township	10,937
Lawrence Township	20,761
Pennington Borough	2,088
Princeton Borough	12,098
Princeton Township	13,772
Trenton City	91,976
Washington Township	3,502
West Windsor Township	8,747
	309,691

<u>1982 Population</u>

<u>MIDDLESEX COUNTY</u>

Carteret Borough	20,274
Cranbury Township	2,003
Dunellen Borough	6,495
East Brunswick Township	38,308
Edison Township	72,592
Helmetta Borough	953
Highland Park Borough	13,187
Jamesburg Borough	4,201
Metuchen Borough	13,530
Middlesex Borough	13,367
Milltown Borough	7,007
Monroe Township	17,113
New Brunswick City	40,842
North Brunswick Township	22,653
Old Bridge Township	53,075
Perth Amboy City	38,442
Piscataway Township	42,862
Plainsboro Township	6,955
Sayreville Borough	30,365
South Amboy City	8,159
South Brunswick Township	17,306
South Plainfield Borough	20,416
South River Borough	14,149
Spotswood Borough	8,464
Woodbridge Township	<u>92,561</u>
	605,279

TOTAL REGION: 1,818,526