Analysis of Impediments to Fair Housing Choice

Morris County, NJ

Parsippany-Troy Hills, NJ

2016

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Chapter 1: Introduction

The County of Morris and the Township of Parsippany-Troy Hills (referred to as "Parsippany" throughout this document) have collaborated to prepare an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This Act requires that any community receiving federal funds through the US Department of Housing and Urban Development (HUD) affirmatively further fair housing. This includes communities receiving Community Development Block Grant (CDBG) funds, as well as HOME and Emergency Solutions Grant (ESG) funds. Morris County and Parsippany are two separate HUD entitlements that are partnered in a HOME Consortium. As a result, the entitlements are charged with the responsibility of conducting their programs in compliance with the federal Fair Housing Act. Further, the obligation extends to nonprofit organizations and other entities that receive the federal funds through the entitlements. These requirements can be achieved through the preparation of an AI and implementation of recommended action items.

The AI is a review of a jurisdiction's laws, regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

Entitlement communities receiving HUD entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status or national origin
- Promote housing that is accessible to and usable by persons with disabilities
- Comply with the non-discrimination requirements of the Fair Housing Act.

Methodology

The consulting firm of Mullin & Lonergan Associates, Inc. (M&L) was retained by Morris County and Parsippany to conduct the AI. M&L utilized a comprehensive approach to complete the Analysis involving the entitlements. The following sources were utilized:

- Existing planning, development, and regulatory documents completed by Morris County and Parsippany
- The most recently available demographic data regarding population, household, housing, income and employment at the census tract and block group level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes

- The Consolidated Plans and Annual Action Plans for the entitlements
- Fair housing complaints filed with the New Jersey Division on Civil Rights and HUD

Interviews were conducted with agencies and organizations that provide housing and housing related services to members of the protected classes. Information obtained through these interviews is included throughout the AI.

Development of the AI

Staff members identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified. Morris County's Office of Community Development was the lead agency for the preparation of the AI. The entitlements engaged in a consultation process with local public agencies, nonprofit organizations and other interested entities.

The consulting team conducted several series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations and their clients. (The public outreach and stakeholder consultation was coordinated between the AI and the Consolidated Plans of Morris County and Parsippany.) Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

In all cases, the latest available data was used to describe the most appropriate geographic unit of analysis. In most cases, 2013 Census data and 2013 American Community Survey (ACS) were available and incorporated into this report. Census tract data has been used at the both the Town and County level, as appropriate.

Fair Housing Choice

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, sex, disability, familial status or national origin. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes. Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

This AI encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration

- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations).

As a federal entitlement community, the jurisdictions have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing
- Maintaining records to support each jurisdiction's initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This AI will:

- Evaluate population, household, income and housing characteristics by protected classes
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions or decisions that restrict or have the effect of restricting the availability of housing choices, based on race, color, religion, sex, disability, familial status or national origin.

This AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The governmental bodies of the jurisdictions will review the AI and use it for direction, leadership and resources for future fair housing planning. The AI will also serve as a point-in-time baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

Chapter 2: Community Participation Process

Summary of Outreach and Community Engagement

The community participation for this AI was undertaken alongside the participation process for the Morris County 2015-2019 Consolidated Plan (CP). It consisted of the following activities:

- Face-to-face interviews with key stakeholders, identified by County staff, whose emphasis involves housing in one facet or another such as housing development, fair housing advocacy, and disability advocacy.
- Written surveys distributed to identified stakeholders.
- Public meetings regarding the CP.
- Providing a 30-day public display and comment period for the AI.

Stakeholder Communication

Interviews

Stakeholder outreach is a highly valuable element of the AI planning process. Reaching out to organizations whose primary clients include members of the protected classes is one of the most effective methods for identifying impediments to housing choice. Listening to direct service providers achieves the best results when trying to learn about the public policies that restrict housing choice.

During the week of January 12-14, 2015, a series of stakeholder interviews and consultations with more than 30 individuals were conducted. Participants included the Morris County Department of Human Services, the Housing Alliance of Morris County, the Continuum of Care, the County Planning Department, and the Housing Authority of the County of Morris. Individual participants represented affordable/special needs housing and service providers, business associations, homeless service agencies, community building organizations, economic development officials, neighborhood groups, health and human service providers, and more.

Surveys

In addition to being invited to in-person interviews, fair housing stakeholders were asked to complete a paper survey about their specific municipality or service area. Respondents were asked to describe the character and magnitude of local housing and supportive service needs, how those needs have changed, and what plans, if any, they had to address those needs. A total of eight respondents completed surveys.

Public Hearings

Morris County follows a Citizen Participation Plan that provides for and encourages the participation in and the development of the CP. Hearings are held that encourage citizen input from residents of low-

and moderate-income neighborhoods, public housing, assisted housing, and non-English speaking residents.

Three hearings were held during development of the 2015-2019 CP. The first meeting was an orientation/application meeting where groups and municipalities could learn how to prepare a funding request. This hearing was held on November 13, 2014. The second meeting was held to obtain input on the needs and goals that would be the foundation of the Five Year Consolidated Plan. This hearing was held on December 11, 2014. The third hearing was held on April 23, 2015 to receive comment on the draft plan and annual allocation of funding.

Each of the hearings were advertised in the *Daily Record* and posted on the Human Services website. Announcement of the availability of funds included a schedule of hearings. This announcement was sent to all the organizations and municipalities in the County. The Morris County Continuum of Care expressed support for the CP; there were no additional comments received through any of the scheduled public meetings.

The Township Council in Parsippany, following the Citizen Participation Plan, held two public hearings regarding their CDBG program. In addition, the Township sent out mailings to all residents which contain information about the program and recent accomplishments. The Township also posts various information on the Township web page, at various Township facilities, and in local newspapers.

Key Fair Housing Issues Identified

Across the various community participation initiatives conducted for this AI, several key issues were mentioned as having a significant effect on fair housing. These included the following:

- There is a lack of affordable land available for single family home construction.
- Lack of funding for affordable housing in Morris County constrains housing choice, which is an indirect impediment to fair housing. There is a not only a need for construction capital but also for rental assistance, down payment assistance, and funding for other services.
- Recent development has trended largely toward expensive rentals instead of serving low- and moderate- income families.
- Pre-development funding can be prohibitive for affordable housing developers.
- HUD's fair market rent is calculated at too regional of a level and is not suitable for Morris County, which has much higher housing costs than neighboring communities.
- The population of Morris County is aging, changing the demand for housing. There are already not enough services or housing catering to 50-60 year olds still in the workforce.
- Individuals with special needs are typically extremely low-income, require supportive services, and face tremendous challenges finding housing that they can afford. Public and private funding sources available for these purposes have been shrinking.
- Credit checks and criminal background checks can be an insurmountable barrier for some low-income households.
- In general, state involvement in housing policies increases the time needed to make progress. Past uncertainty regarding the Council on Affordable Housing has stalled some development.

These results represent statements and opinions gathered during the public outreach process. They are not necessarily the official position of Morris County, Parsippany, or any other County agency or organization.

Summary of Comments Received

Following the 30-day public display and review period, comments received on the draft AI will be summarized and incorporated into an appendix of the final version of the document.

Chapter 3: Data Analysis

Demographic Analysis

This section of the AI analyzes the demographic and housing characteristics of Morris County and Parsippany, focusing on topics that are related to fair housing issues.

Population Trends

Morris County was home to 497,591 residents in 2013. Parsippany is its largest community, containing 52,804 (10.6%) of the County's population.

The population trends of Morris County and Parsippany reflect decades of transition within the local economies and housing market. Morris County, Parsippany, and the State of New Jersey all experienced high growth rates in the 1970s. This was due to a number of factors, including ongoing suburbanization and regional economic restructuring. Since then, population growth in the communities in Morris County has generally been slightly positive and stable. Morris County's local economy has not relied upon large-scale industrial manufacturing. As a result, the area did not experience the population shifts associated with deindustrialization that affected many other parts of northern New Jersey.

	Morris County		Parsippany		New Jersey	
	#	%	#	%	#	%
1970	383,454	46.6%	55,112	115.0%	7,168,164	18.2%
1980	407,630	6.3%	49,868	-9.5%	7,364,823	2.7%
1990	421,353	3.4%	48,478	-2.8%	7,730,188	5.0%
2000	470,212	11.6%	50,649	4.5%	8,414,350	8.9%
2010	492,276	4.7%	53,238	5.1%	8,791,894	4.5%
2013	497,591	1.1%	52,804	-0.8%	8,832,406	0.5%

Source: 2013 ACS DP05, 2000 Census P001, 1990 Census, 1980 Census, 1970 Census, 1960 Census (for growth rate comparison only)

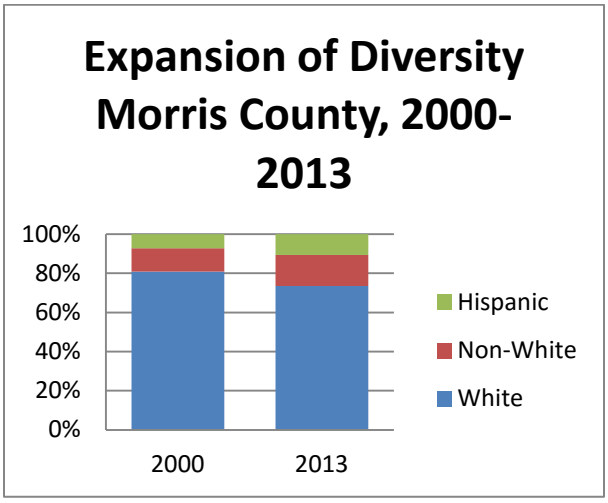
Race and Ethnicity

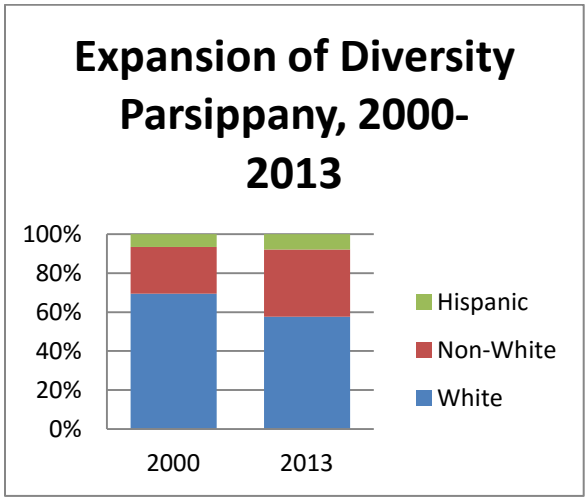
The populations in both Morris County and Parsippany have followed the national trend of becoming more diverse. While the general population in Morris County grew 5.33% between 2000 and 2013, the White population decreased by 2,700 persons. The trend was more pronounced in Parsippany, where the White population decreased by 4,173 residents. Conversely, the non-White and Hispanic populations increased in both Morris County and Parsippany. In Morris County, non-Whites increased 45.3% (27,411 persons) and Hispanics increased 59.7% (21,882 persons), compared to a 0.66% decline in the White population.

In Parsippany, non-Whites increased 53.4% (6,979 persons) and Hispanics increased 28.6% (1,011 persons) compared to an 11.9% decrease in the White population. This loss of White residents is more

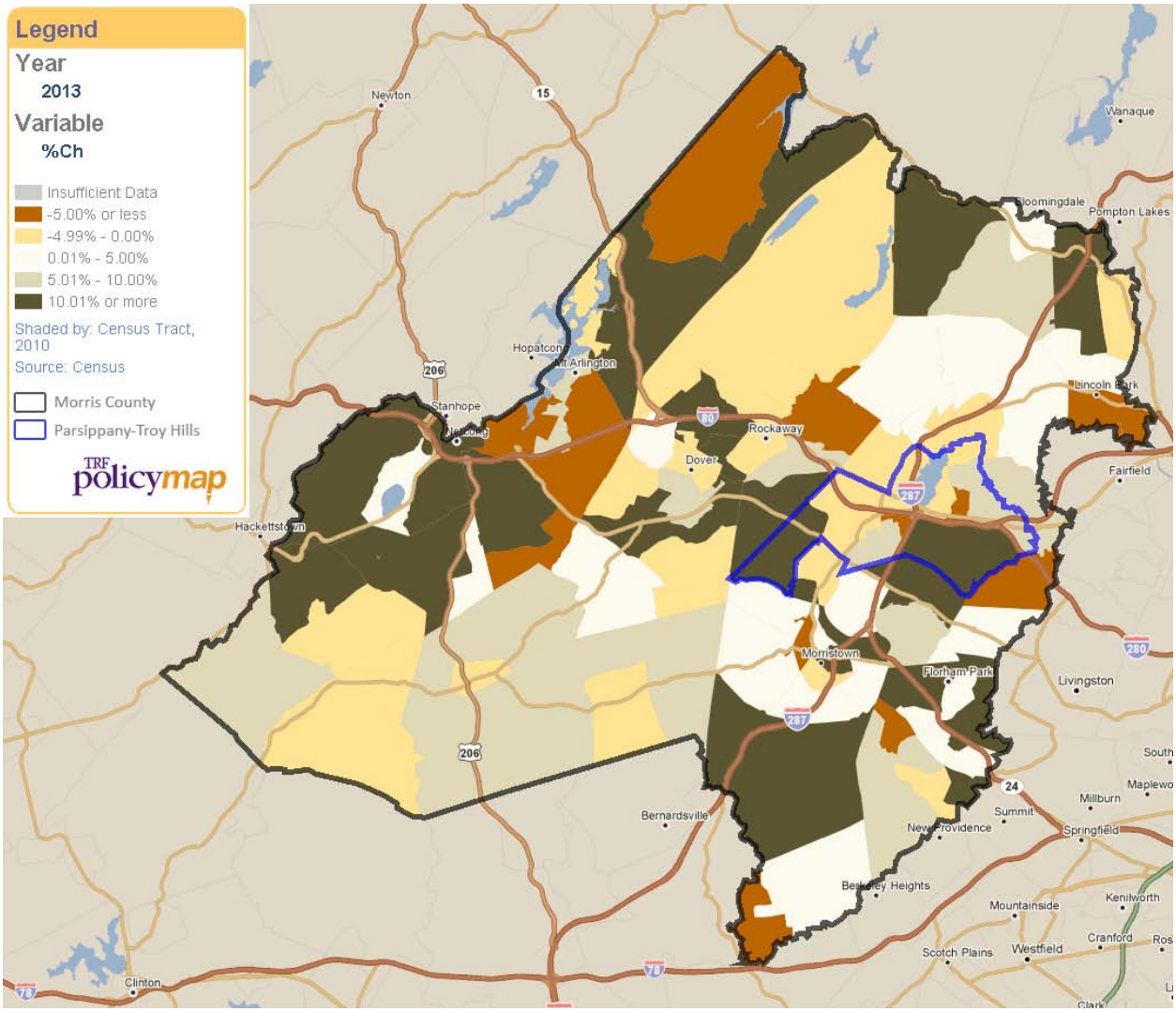
marked in Parsippany than in Morris County as a whole. However, the growth in Hispanic residents (28.6%) in Parsippany is occurring less rapid than in Morris County, where the Hispanic population grew 59.7%.

The growth of the Hispanic population in Morris County and Parsippany is noteworthy, as it contrasts with traditional outlooks on immigration. Hispanic residents tend to be much newer immigrants, often either first or second-generation. Regional immigration is generally thought of as an urban-based trend, in which new immigrants migrate to urban areas and gradually suburbanize. However, the diversification of Morris County indicates that this is not necessarily the case.

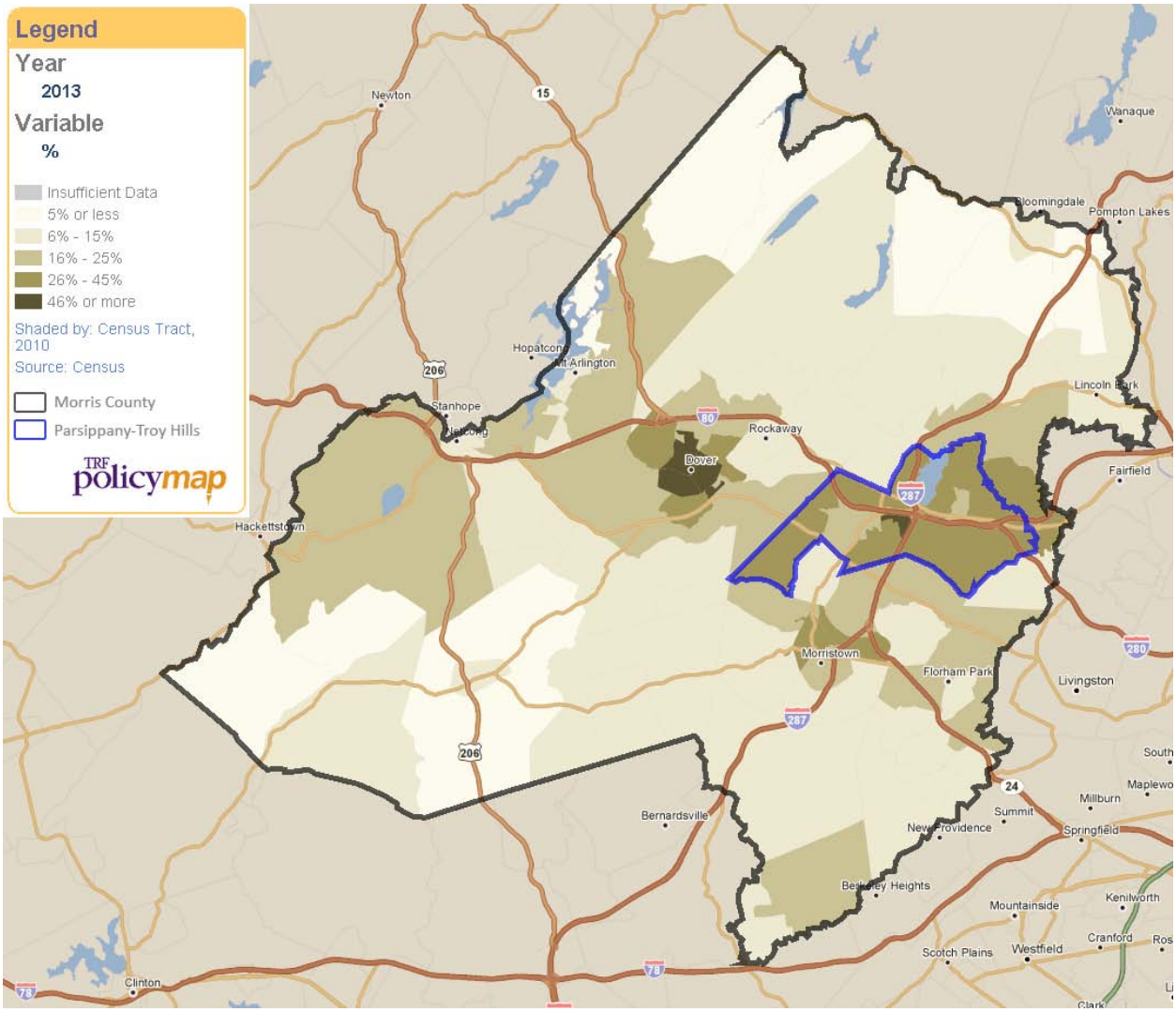




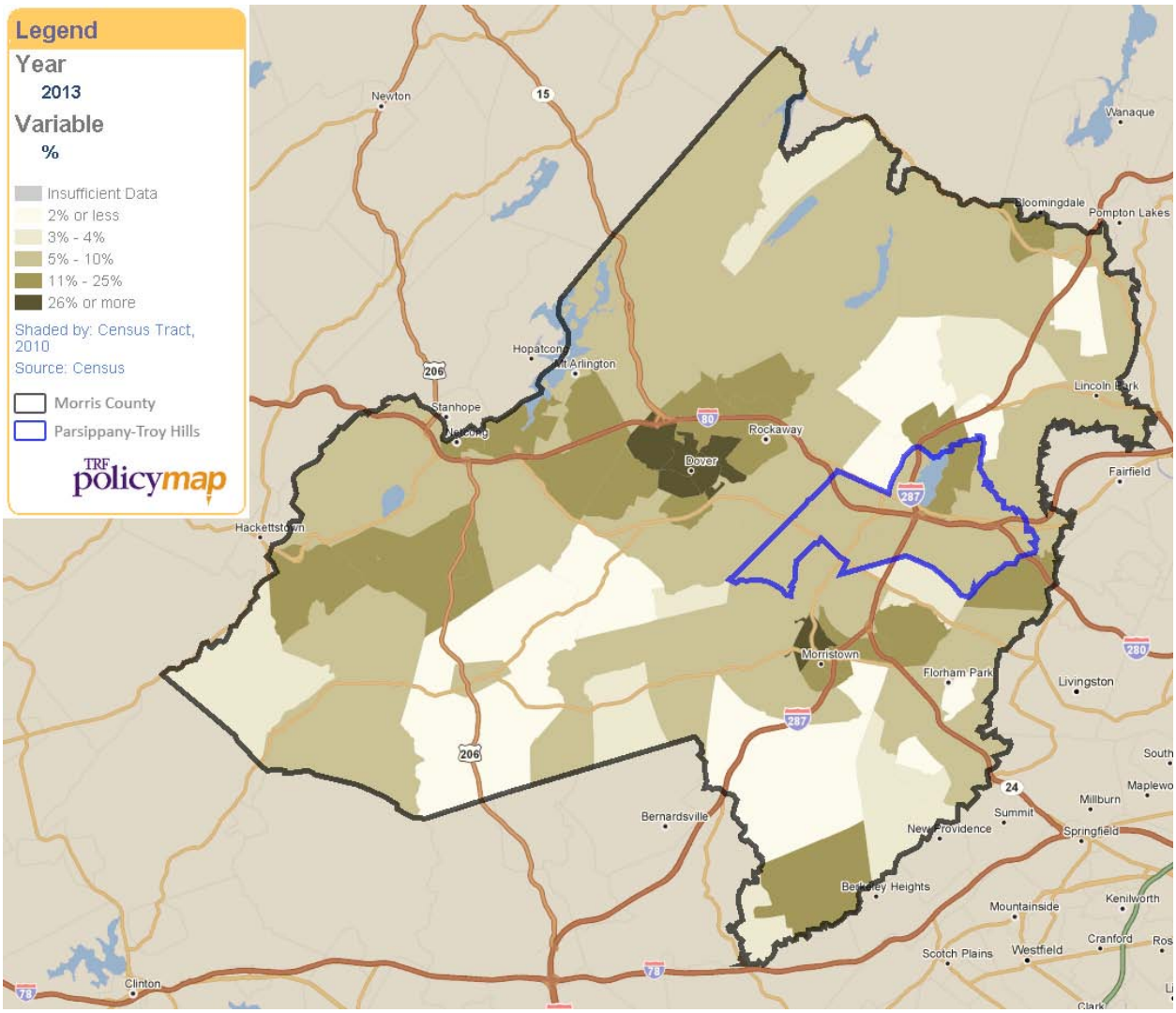
Population Change, 2000-2013



Non-White Population, 2013



Hispanic Population, 2013



Income and Poverty

According to data from the US Bureau of Labor Statistics, the unemployment rates in Morris County have consistently been lower than the State of New Jersey overall. Parsippany's unemployment rate has generally been about the same as Morris County overall, although unemployment rates were slightly below-average in the economic boom of the late 1990s and slightly above-average in the recession years of 2010-2012.

The American Community Survey (ACS) provides detailed employment data by gender and race, indicating differences in employment rates among demographic groups. Income is strongly related to housing choice, as household income is also one of several factors used to determine eligibility for a home mortgage loan or rental lease. Additionally, a lack of income inherently reduces the options a household has when deciding where to live. The median household income in Morris County was $98,633. This was much higher than the statewide median of $71,629 and the national median of $52,250. Median household income in Parsippany was $86,329, which is below the County median but still much higher than the statewide and national median household incomes. Within Morris County, median household income was highest in Mendham Township ($169,141) and lowest in Victory Gardens ($48,992).

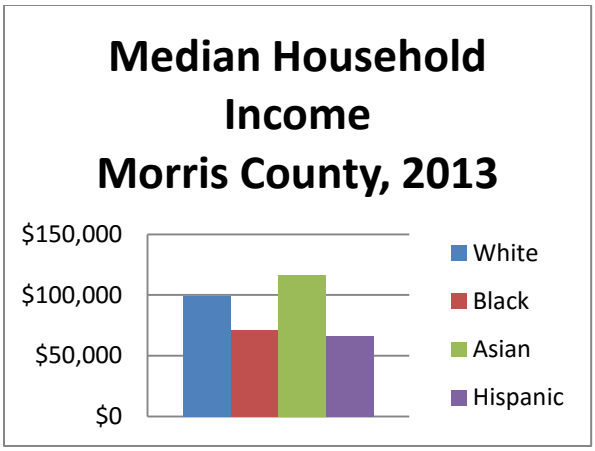
Poverty is also strongly related to limited housing choice and disproportionately affects members of the protected classes. The federal poverty level in 2013 was defined as an annual income of $23,550 for a family of four, or $11,490 for an individual. In Morris County, the overall poverty rate was 4.4%. The percentage of households below the poverty line ranged from a high of 19.4% in Victory Gardens to a low of 1.3% in Mendham Borough. Poverty rates in the majority of Morris County are much lower than the national average of 14.3%.

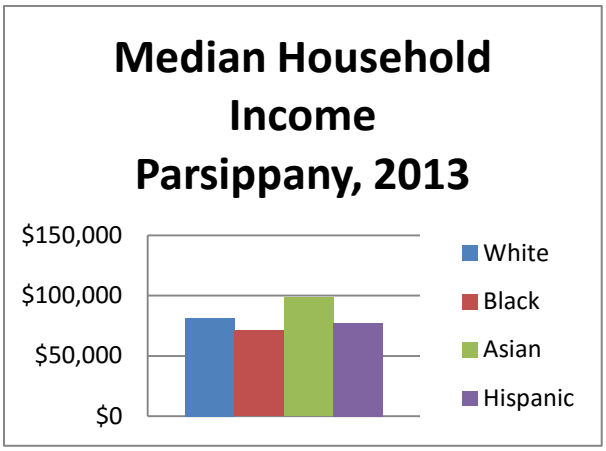
There were significant differences in median incomes and poverty rates by races and ethnicities. Whites and Asians in Morris County had higher incomes and lower poverty rates than the countywide average. Conversely, Blacks and Hispanics had lower median incomes and higher poverty rates than the countywide average. The median household income of a Black household was 28% lower than the median household income of a White household. Blacks and Hispanics were more than twice as likely to be living in poverty compared to a White or Asian household. Data on poverty and income by race in Morris County and Parsippany is shown below:

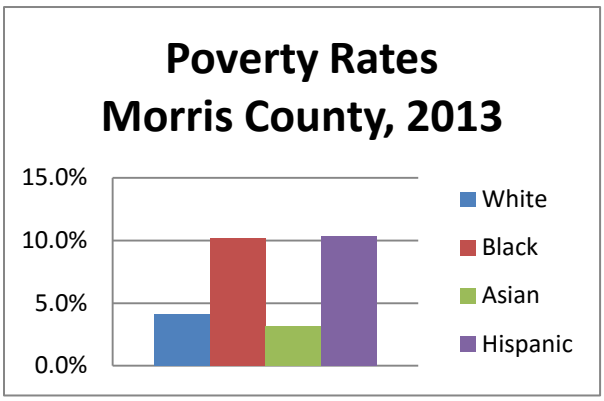
Poverty Rates and Median Household Incomes by Race, 2013		
	Poverty Rate	Median Household Income
Morris County		
White	4.1%	$99,385
Black	10.2%	$71,229
Asian	3.2%	$116,200
Hispanic	10.3%	$66,201
Parsippany		
White	4.0%	$81,451
Black	5.8%	$71,174
Asian	3.7%	$98,333
Hispanic	8.8%	$77,210

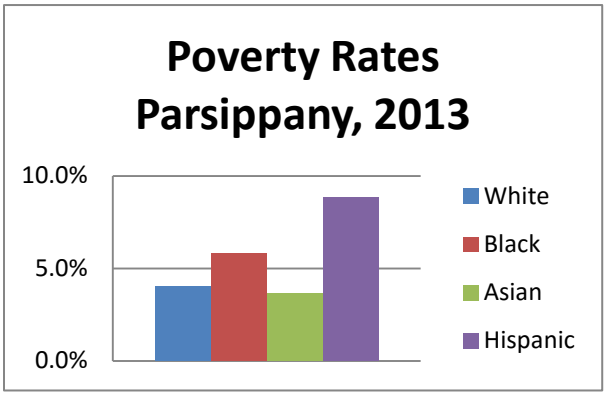
Source: 2009-2013 ACS B19003A-B19003I, B17001A-B17001I

In Parsippany, there were also significant differences in median incomes and poverty rates between races and ethnicities. However, Blacks and Hispanics had lower poverty rates than Morris County. While the median household income for Black households in Parsippany was similar to the countywide average, Hispanic households in Parsippany had median household incomes about $11,000 higher than the countywide median household income for Hispanics. Conversely, median household incomes for Asians were lower in Parsippany than the countywide average. The overall poverty rate in Parsippany was slightly lower than the County average, at 4.1%.







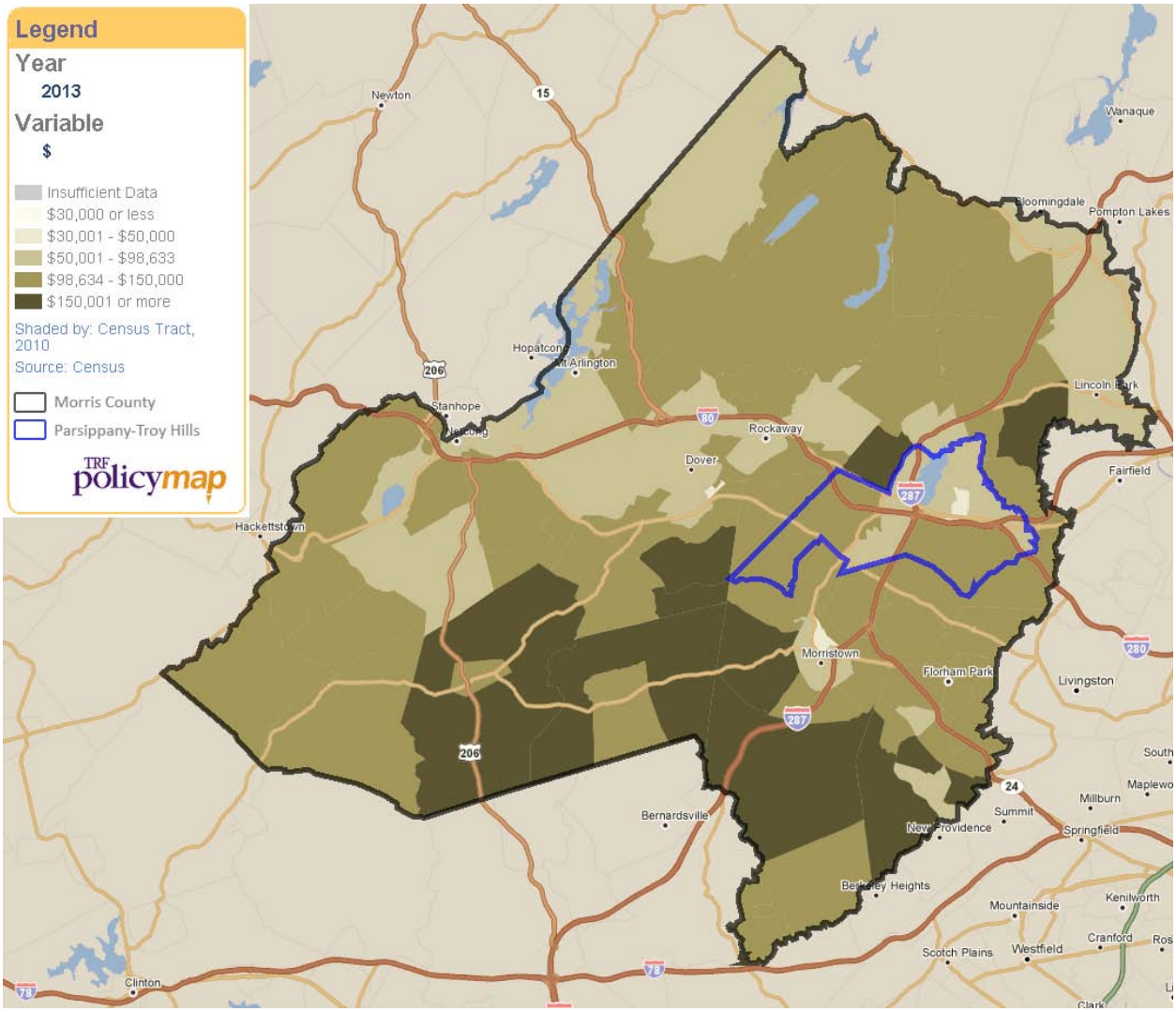


Persons living below the poverty line tended to be disproportionately members of the protected classes. In particular, persons living in poverty were more likely to be:

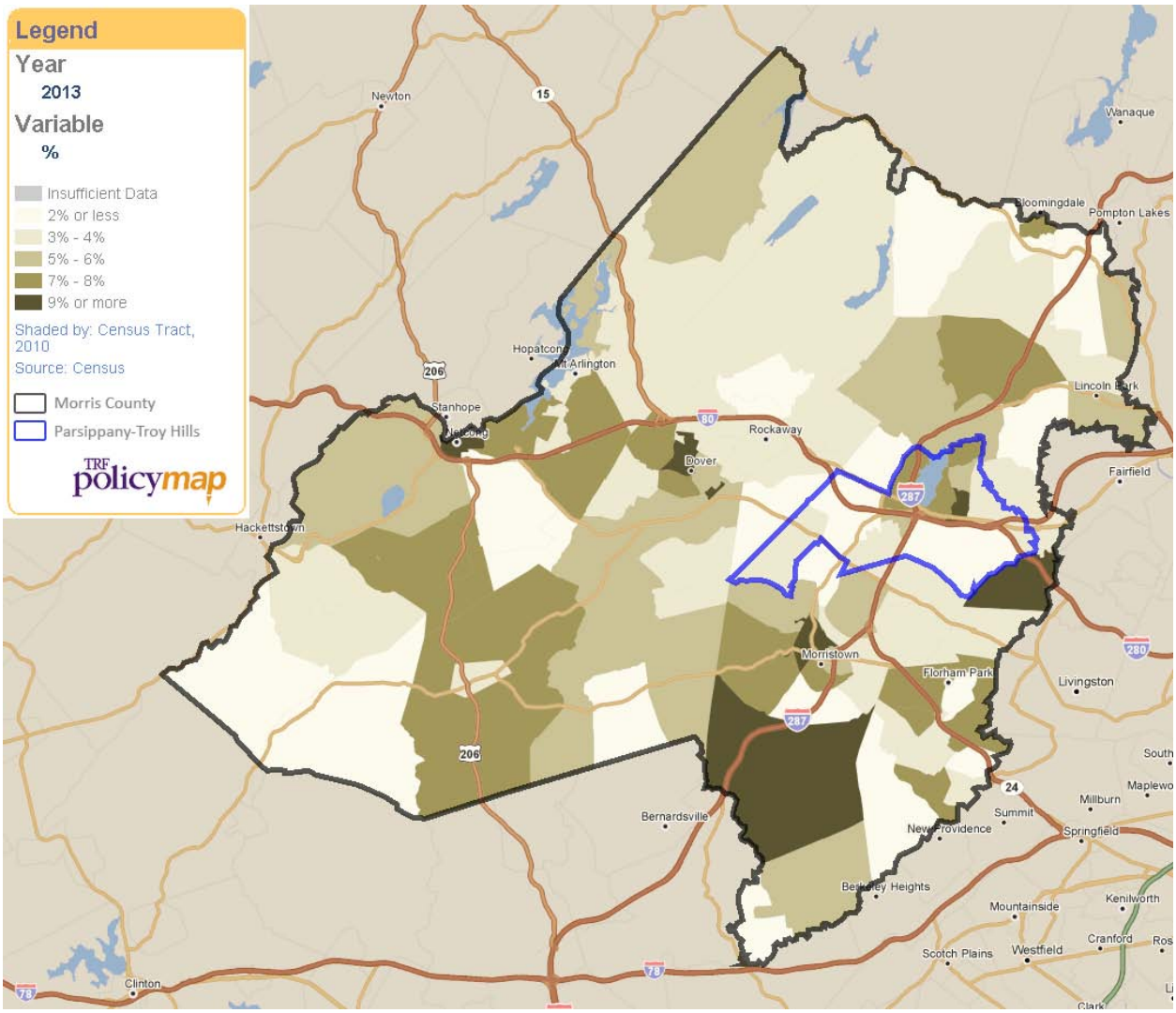
- Female
- Children or senior citizens
- Black, Native American, or Hispanic
- Living in female-headed households with no husband present
- Foreign-born
- Disabled

Because of the low sample size of persons in poverty, specific data is not available for Parsippany. However, due to similar overall demographics, the situation in Parsippany is likely similar to Morris County overall.

Median Household Income, 2013



People in Poverty, 2013



Characteristics of Persons Below Poverty Line, Morris County, New Jersey		
	Total	Below Poverty Line
Total Population	487,305	4.40%
Sex		
Male	238,611	4.00%
Female	248,694	4.80%
Age		
Under 18 years	114,606	4.70%
Related children under 18 years	114,192	4.30%
18 to 64 years	303,799	4.30%
65 years and over	68,900	4.50%
Race and Ethnicity*		
One race	477,772	4.40%
White	401,496	4.10%
Black or African American	14,290	10.20%
American Indian and Alaska Native	681	16.00%
Asian	45,482	3.20%
Some other race	15,737	9.60%
Two or more races	9,533	4.50%
Hispanic or Latino origin (of any race)*	57,545	10.30%
Living Arrangement		
In family households	424,853	3.40%
In married-couple family	359,831	2.20%
In Female householder, no husband present	46,354	10.50%
In other living arrangements	62,452	11.30%
Nativity and Citizenship Status		
Native	396,564	3.80%
Foreign born	90,741	7.00%
Naturalized citizen	50,821	3.40%
Disability Status		
With any disability	37,215	9.90%
No disability	449,913	4.00%

Source: 2009-2013 ACS S1703

*Note: Hispanic ethnicity is calculated independently of race

Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to engage in activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

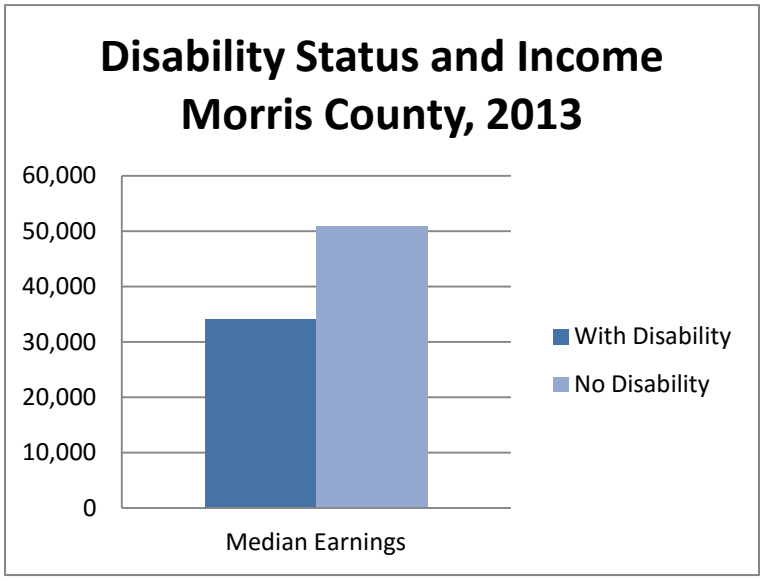
The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes

to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). Many persons with disabilities, regardless of type, require access to adequate transportation systems and human services, because their disability often makes it impossible or impractical to walk or drive as a means of transportation. This means that in addition to requiring accessible housing with universal design features, persons with disabilities require housing located in areas with access to these amenities.

Across Morris County, 34,963 persons reported having a disability in 2013. This amounted to 9.8% of the total non-institutionalized population. The most common type of disability reported was an ambulatory disability, meaning experiencing difficulty moving from place to place. Persons with ambulatory disabilities, which affect 18,127 (3.6%) of Morris County residents, often require accessible housing with accessibility features.

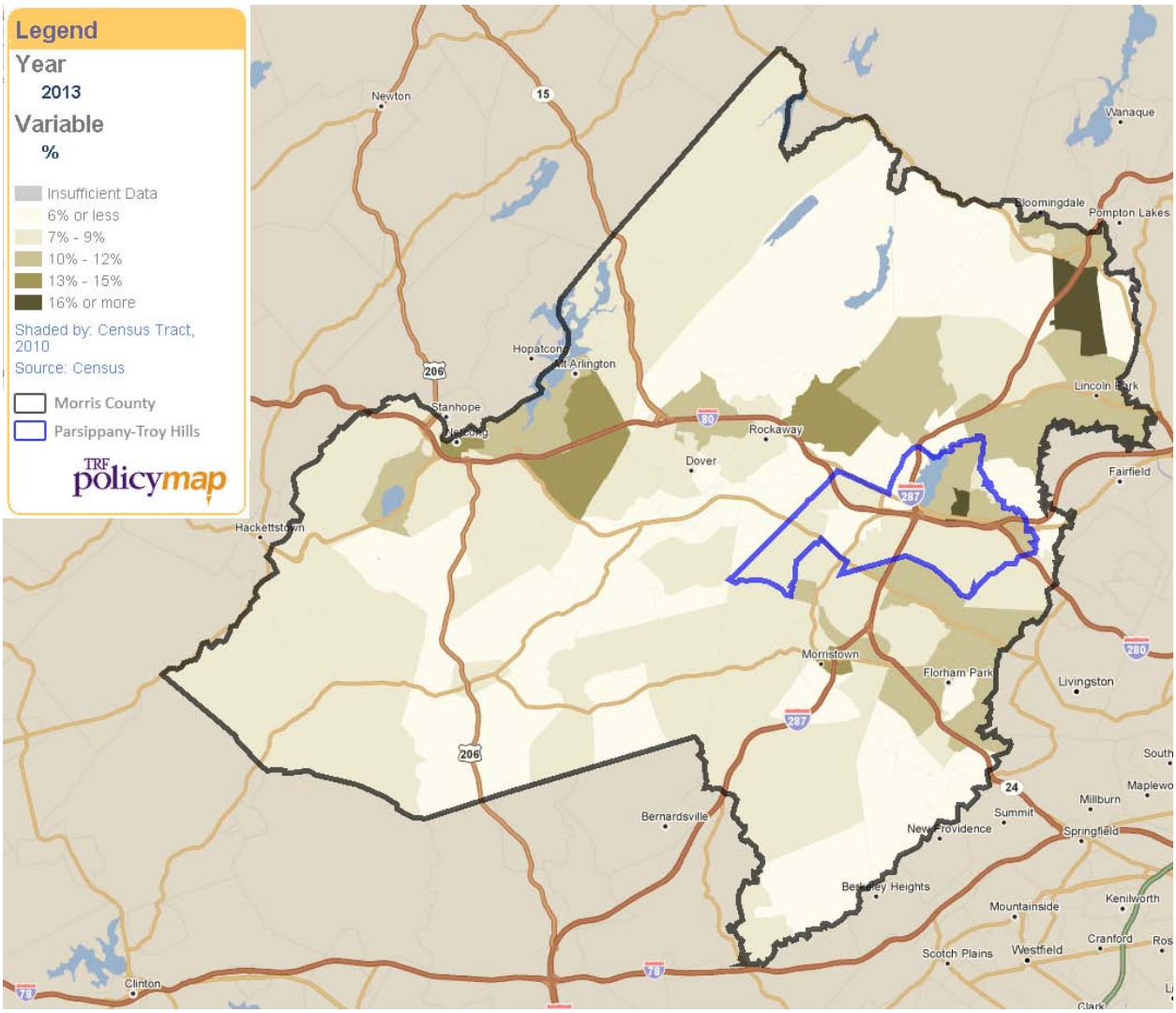
The second most common type of disability was an independent living disability. There were 14,949 persons with independent living disabilities in Morris County, amounting to 2.9% of the population. Persons with independent living disabilities generally require assistance performing basic daily tasks, and may require permanent supportive housing, assisted living, or other types of residence.

A significant income gap exists between persons with disabilities and persons without disabilities. In Morris County, persons with disabilities have median earnings $16,808 less than persons without disabilities. Similarly, the poverty rate for the population age 16 and over with a disability is 6.1% higher than the population without a disability.

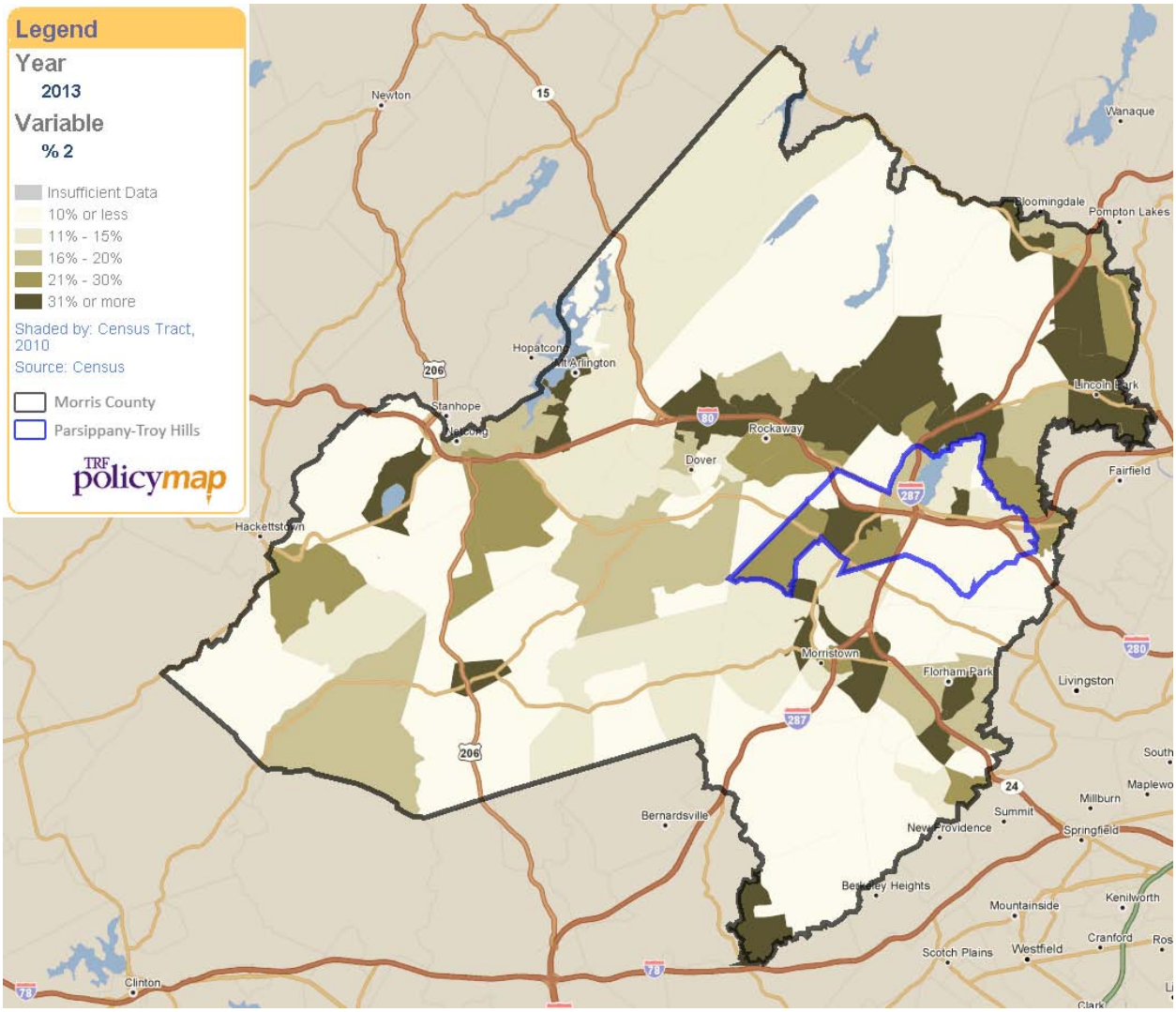


These statistics include the 4,173 persons in Parsippany living with a disability in 2013. This amounted to 7.9% of the total non-institutionalized population. The most common types of disabilities in Parsippany were vision disabilities and independent living disabilities, each of which affected 2.6% of the population. While data on disabled persons in poverty in Parsippany is unavailable, it is likely that Parsippany's disabled population also has higher rates of poverty than the general population.

Population with a Disability, 2013



Percent of People in Poverty with a Disability, 2013



Ancestry and Income

It is illegal to refuse the right to housing based on ancestry or place of birth. Because many new migrants to the United States choose to settle on the East Coast, Morris County has always been home to a large foreign-born population. Census data on native and foreign-born populations reported that in 2013, 91,391 persons (18.4% of the total population) in Morris County were foreign-born. Of the foreign-born population, 44% are not US citizens.

The most common race among foreign-born residents is White, accounting for 48.2% of the foreign-born population. This is much lower than Morris County's overall White population, which is 82.2% White. The largest differences in race between the native and foreign-born populations in Morris County were among the Asian population: the native-born population was 3.4% Asian, while the foreign-born population was 34.9% Asian. Ethnically, Hispanic residents comprise 31.9% of Morris County's foreign-born population, compared to 7.3% of the population born in the United States.

In Parsippany, there are 10,466 foreign-born persons (34.2% of the total population). Unlike Morris County, the majority of the foreign-born population is Asian: 62.8% of the foreign-born population is Asian, compared to 12.4% of the native population.

Household sizes are significantly larger in households headed by foreign-born residents. The average household size for a native-born household in Morris County is 2.59 persons, compared to an average of 3.17 persons among foreign-born households. This means that foreign-born households may often require larger houses in order to avoid overcrowding and other housing problems. In Parsippany, the average household size is 2.39 persons among native-born households and 3.09 for foreign-born households. Foreign-born residents are more likely to be renters as well.

The educational attainment levels of the foreign-born population in Morris County shows a divide within this population. In Morris County, 22% of the foreign-born population has a graduate or professional degree, compared to 19.8% of the native-born population. This indicates that many foreign-born workers are highly educated and presumably qualified for highly skilled, well-paying jobs. However, foreign-born residents are also more likely to have not finished high school. Compared to the native-born rate of 3.9%, foreign-born persons were over three times likely (15.9%) to have less than a high school education compared to native-born persons. This indicates that there may be sharp divides in the socioeconomic status of foreign-born population. This is notable because foreign-born populations are often perceived as having lower levels of educational attainment. In Morris County, this is not necessarily the case. This divide within the foreign-born population is an important point to consider from a fair housing advocacy perspective.

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. American Community Survey data reports on the non-English language spoken at home for the population five years and older. In 2013, the ACS reported 34,763 persons in Morris County (excluding Parsippany) and 7,824 persons in Parsippany spoke English less than "very well."

Foreign-born persons are much more likely to have limited English proficiency compared to native-born persons. Compared to 1.5% of native-born persons in Morris County who categorize their ability to speak English as “less than very well”, 40.6% of foreign-born persons in Morris County speak English “less than very well”. This is also true in Parsippany: while 1.7% of Parsippany’s native-born population speaks English “less than very well”, 40.1% of the foreign-born population speaks English “less than very well”. This means that foreign-born workers may be more susceptible to housing discrimination in the private market, as both their ability to navigate the housing system may be impaired or limited by their English proficiency and, in many cases, their accents.

Comparison of Native and Foreign-Born Populations, 2013						
	Morris County, New Jersey			Parsippany		
	Total	Native	Foreign Born	Total	Native	Foreign Born
Total population	495,261	403,870	91,391	53,483	35,139	18,344
Race/Ethnicity*						
One race	98.0%	98.3%	97.1%	97.3%	97.1%	97.6%
White	82.2%	89.9%	48.2%	62.5%	80.0%	29.1%
Black or African American	3.2%	3.1%	3.6%	3.7%	3.7%	3.5%
American Indian and Alaska Native	0.1%	0.1%	0.4%	0.1%	0.2%	0.0%
Asian	9.2%	3.4%	34.9%	29.7%	12.4%	62.8%
Native Hawaiian and Other Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Some other race	3.2%	1.7%	10.0%	1.2%	0.8%	2.1%
Two or more races	2.0%	1.7%	2.9%	2.7%	2.9%	2.4%
Hispanic or Latino origin (of any race)	11.8%	7.3%	31.9%	8.5%	6.3%	12.8%
White alone, not Hispanic or Latino	74.2%	84.8%	27.4%	55.4%	75.1%	17.6%
Educational Attainment and Languages						
Population 25 years and over	342610	262428	80182	38887	22455	16432
Less than high school graduate	6.5%	3.9%	15.0%	6.8%	4.3%	10.1%
High school graduate (includes equivalency	23.0%	23.3%	22.0%	24.0%	28.7%	17.5%
Some college or associate's degree	20.5%	21.8%	16.0%	17.6%	20.6%	13.5%
Bachelor's degree	29.7%	31.1%	25.0%	31.2%	30.3%	32.5%
Graduate or professional degree	20.3%	19.8%	22.0%	20.4%	16.1%	26.4%
Speak English less than "very well"	9.1%	1.5%	40.6%	15.5%	1.7%	40.1%
Employment						
Population 16 years and over	393857	307069	86788	43703	26141	17562
In labor force	69.2%	68.2%	72.9%	69.4%	67.9%	71.7%
Civilian labor force	69.2%	68.1%	72.9%	69.4%	67.9%	71.7%
Employed	64.1%	63.0%	68.1%	63.4%	61.0%	67.1%
Unemployed	5.1%	5.1%	4.8%	6.0%	7.0%	4.6%
Not in labor force	30.8%	31.8%	27.1%	30.6%	32.1%	28.3%
Median Household income	98633	101090	90207	86329	82784	91412
Average number of workers per household	1.36	1.3	1.59	1.36	1.25	1.53
Poverty						
Below 100 percent of the poverty level	4.4%	3.8%	7.0%	4.1%	3.3%	5.7%
100 to 199 percent of the poverty level	8.3%	6.8%	14.8%	9.3%	8.3%	11.2%
At or above 200 percent of the poverty leve	87.3%	89.4%	78.2%	86.5%	88.3%	83.1%

Source: 2009-2013 ACS S0501

Foreign-born residents have lower incomes and higher poverty rates than native-born residents. The poverty rate for foreign-born households in Morris County is 7%, compared to 3.8% for native-born households. Foreign-born households had a median household income of $90,207, compared to a median household income of $101,090 for native-born households.

Interestingly, foreign-born households had higher median household incomes in Parsippany. In 2013, the median household income among foreign-born residents was $91,412, compared to $82,784 for native-born households. However, the poverty rates for foreign-born households were higher, with 5.7% of foreign-born households falling below the poverty line compared to 3.3% of native-born households. This discrepancy could indicate segmentation within Parsippany's foreign-born population: while some foreign-born households may be earning very high wages, others are struggling.

The most commonly spoken language among persons with LEP in Morris County was Spanish, with 22,311 speakers. The second most common language spoken by LEP persons was Gujarati, with 5,562 speakers. This indicates the presence of a large Indian population.

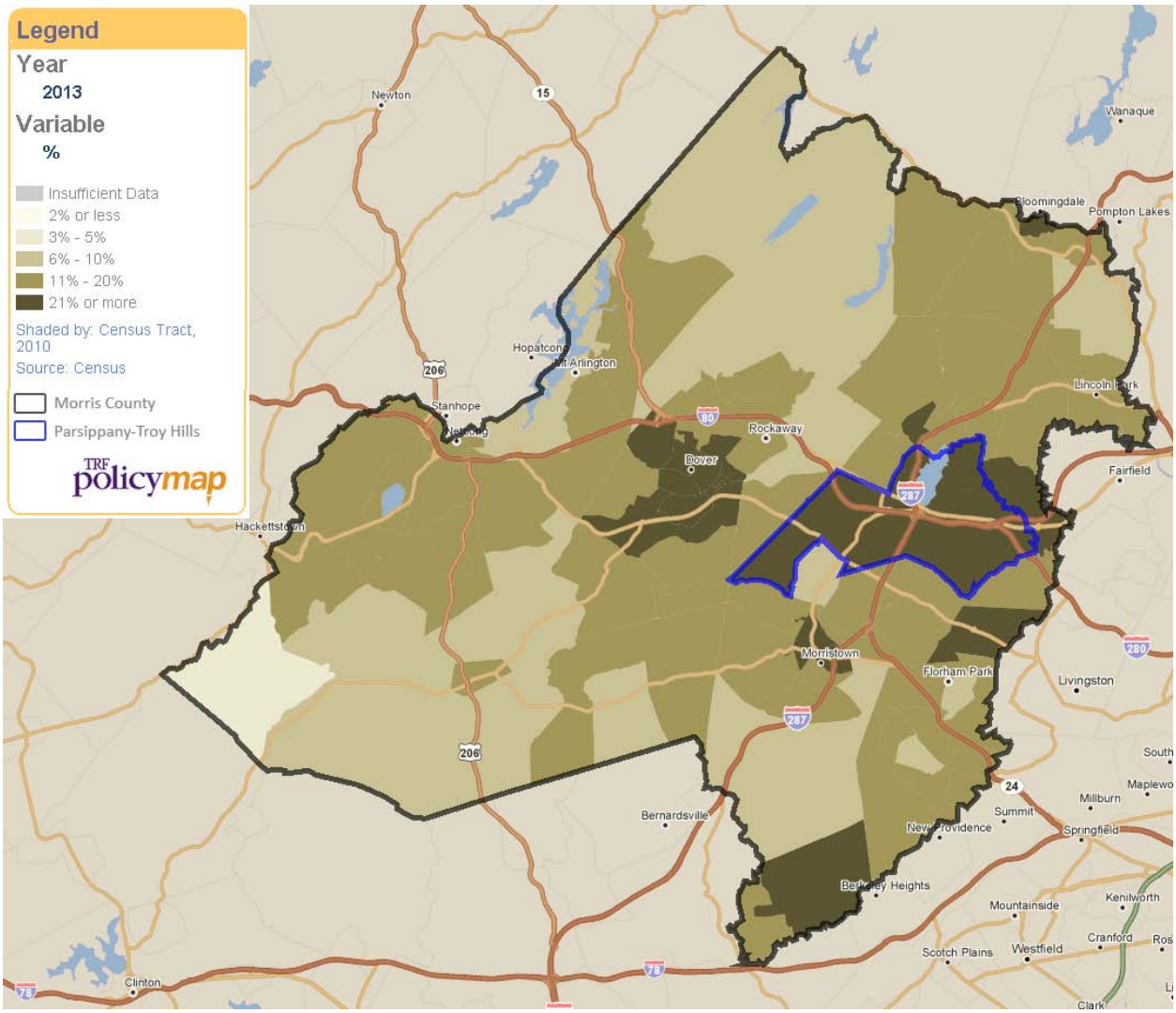
Several languages spoken by persons with LEP in Morris County have over 1,000 speakers or comprise 1% of the total population, which may trigger HUD's safe harbor threshold. These languages included Spanish, Gujarati, Chinese, and Italian. In Parsippany, Spanish, Gujarati, and Chinese all had over 1,000 LEP speakers.

Of Parsippany's 50,336 persons age 16 and over, there were 7,824 LEP persons. This amounts to 15.5% of the total population. Of this population, there were over 1,000 LEP speakers of Spanish, Gujarati, and Chinese. As these speakers are over 1% of the total population, these may trigger HUD's safe harbor threshold.

Top Languages Spoken by LEP Persons Morris County, 2013	
Total Population	468,603
Spanish	22,311
Gujarati	5,562
Chinese	5,038
Italian	1,100
Polish	976
Korean	969
Russian	965
Hindi	954
Top Languages Spoken by LEP Persons Parsippany, 2013	
Total Population	50,336
Spanish	1,570
Gujarati	1,317
Chinese	1,534
Hindi	569
Other Indic Languages	414
Other Asian Languages	403
Tagalog	222
Vietnamese	256
Persian	211

Source: 2009-2013 ACS B16001

Foreign Born Population, 2013



Familial Status

The Census Bureau divides households into family and non-family households. Family households are married couples (with or without children), single-parent families, and other families comprised of related persons. Non-family households are either single persons living alone, or two or more nonrelated persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In addition to families with children, larger families may be at risk for housing discrimination on the basis of race and familial status. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes. Such policies do not exist at the county level or within New Jersey state law, but can potentially exist in municipal ordinances. This is discussed further in the Zoning Analysis section of this document.

In Morris County, female-headed households with children increased slightly from 7.2% of all households in 2010 to 7.4% in 2013. The percentage of male-headed households with children also increased during this time period from 1.8% in 2010 to 2.2% in 2013. By comparison, married-couple households with children as a percentage of all households declined from 26.1% in 2010 to 25.4% in 2013, paralleling national trends.

Segregation and Integration

Residential segregation can be measured using statistical tools called the dissimilarity index[1] and the isolation index.[2] These indices measure the degree of separation between racial or ethnic groups living in a community. An extreme example of segregation would be an exactly equivalent split between predominantly high-income, White, suburban communities and low-income, minority, inner-city neighborhoods. For this analysis, racial statistics for each census tract in the County were compared to countywide/municipal numbers. Since White residents are the majority in Morris County, all other racial and ethnic groups were compared to the White population as a baseline.

The index of dissimilarity allows for comparisons between subpopulations (i.e. different races), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. Typically, a score under 30 is considered low, between 30 and 60 is moderate, and above 60 is high.

The index of isolation compares the proportion of a group in a neighborhood to the proportion of the group in a larger area. Conceptually, the isolation index measures the extent to which minority members are exposed only to one another. For example, if Hispanics tend to live in almost entirely Hispanic neighborhoods, the isolation index will be high. The isolation index is rated on a scale from 0 to 100, in which a score of 0 corresponds to maximum exposure and a score of 100 represents complete isolation.

Dissimilarity and isolation are related to each other. The main difference is that the dissimilarity index does not take into account the relative size of the groups, while the isolation index does.

In 2013, the dissimilarity indices by census tract for all non-White groups in Morris County were principally at the low end of the moderate range. This means that non-White groups in the County are segregated from Whites. The dissimilarity index for Hispanic residents is the highest, indicating that Hispanics are less likely than other groups to live in racially-mixed neighborhoods and more likely to be isolated from other races and ethnicities. The isolation indices for non-Whites, on the other hand, are all very low. This means that members of minority groups are unlikely to interact solely amongst themselves.

The dissimilarity values all decreased between 2000 and 2013. This indicates that racial and ethnic segregation has decreased in Morris County. The dissimilarity index between Whites and Blacks

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[1] For a given geographic area, the index is equal to 1/2 Σ ABS [(b/B)-(a/A)], where b is the minority population of a sub-region, B is the total minority population in the larger region, a is the majority population of a sub-region, and A is the total majority population in the larger region. ABS refers to the absolute value of the calculation that follows.

[2] For a given geographic area, the index is equal to [Σ (a/A) * (a/t)], where a is the group population of a sub-region, t is the population of all groups in the sub-region, and A is the total group population in the larger region.

decreased the most, although the level of segregation between Black and White populations remains moderate.

The isolation index in 2013 for Whites was 84.29, indicating that White residents of Morris County experience high levels of isolation. Hispanics experience the next-highest levels of isolation, which may indicate the presence of ethnic enclaves within Morris County. While White and Black isolation decreased between 2000 and 2013, Hispanic and Asian isolation increased.

Dissimilarity and Isolation Indices, Morris County		
	2000	2013
White-Black Dissimilarity	0.81	0.60
White-Hispanic Dissimilarity	0.84	0.69
White-Asian Dissimilarity	0.65	0.64
White Isolation	88.06	84.29
Black Isolation	7.12	6.65
Hispanic Isolation	25.1	30.31
Asian Isolation	10.19	17

Source: 2009-2013 ACS DP05, 2000 Census SF3

Racially Concentrated Areas of Poverty

Although ethnicity and race as described by the US Census are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations, henceforth referred to collectively as racially concentrated areas of poverty, or RCAPs.

The standard HUD definitions of RCAPs and ECAPs (ethnically concentrated areas of poverty) are areas where the total non-White population is greater than 50% and the poverty rate is greater than 40%. These baseline thresholds are meant to serve as starting points for communities across the US. HUD encourages communities to modify these thresholds if they do not make sense for local demographics. This was the case in Morris County, as HUD's standard definition for poverty rate did not adequately capture the extent of the County population living in poverty. As the thresholds used to define RCAPs vary from place to place, it is often difficult to compare RCAPs in different areas to each other.

The thresholds for RCAPs in this analysis were set to mirror the thresholds used in Morris County's 2015-2019 Consolidated Plan. This means that RCAPS are considered to be areas where at least 15% of the population is non-White and there is a 10% or higher rate of people below the poverty level. While the threshold used in the Consolidated Plan was 10.08% (reflective of the top two quintiles of values), a threshold of 10% was chosen in order to make the methodology more accessible to the general public. Changing this threshold did not change the tracts identified.

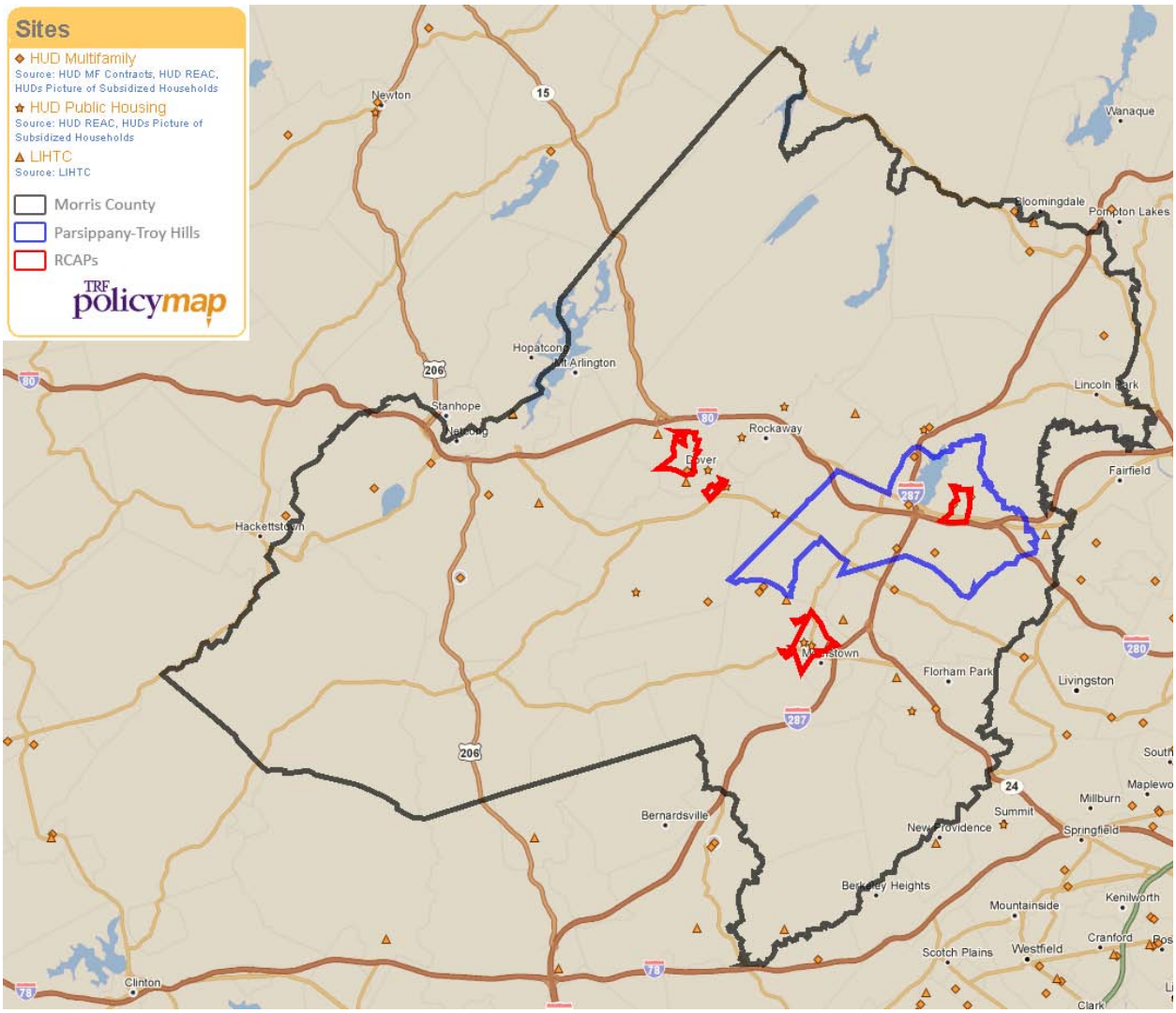
The largest concentration (>15%) of Black/African American population is in Morristown. For Asians, the largest concentration (>15%) is in Parsippany and also a tract just south of Dover. For Hispanics, the largest concentrations (>15%) are in Morristown and Greater Dover.

Using poverty rate as a proxy for low-income residents and a definition of “concentrated” as being within the top two quintiles of the map (meaning a poverty rate above 10%), there are only two small concentrations of poverty in the County, located in Dover and Morristown. There are also census tracts with relatively high poverty rates within Parsippany and Stanhope-Netcong, but they are more isolated and surrounded by tracts with lower poverty rates. The tracts identified as racially concentrated areas of poverty are:

- Census Tract 435: Morristown
- Census Tract 438: Morristown
- Census Tract 417.05: Parsippany
- Census Tract 450: Dover
- Census Tract 456.02: Victory Gardens

Notably, racial concentration and poverty are not guaranteed to be directly related.

RCAPs and Subsidized Housing Locations, 2013



Housing Need

Housing Type and Tenure

Development Patterns in Morris County are generally low-density to medium-density, except for certain core areas in town centers. Housing in the county is predominantly single-family and owner-occupied. Of the 190,170 housing units in the County, 74.2% were owner-occupied and 74.5% were single-family.

Multi-family units were much more likely to be renter-occupied. While 7.4% of owner-occupied units were multi-family, 77.8% of rental housing units were multi-family.

Between 2000 and 2013, 15,791 housing units were added to Morris County's housing inventory. This 9.4% increase in supply was largely a function of the modest population growth Morris County experienced, despite the impact of the economic recession over this time period. This new residential development has slightly changed the built environment of Morris County considerably since the completion of its last AI.

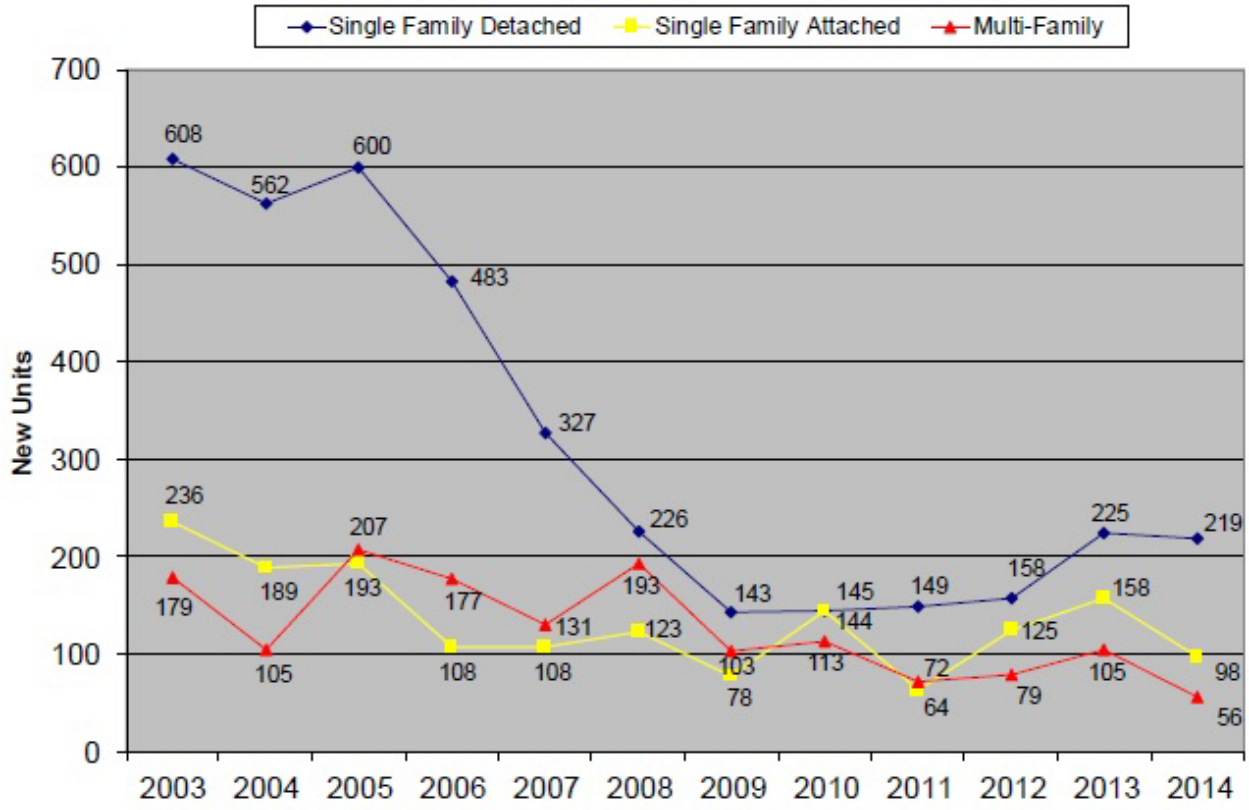
This growth also includes 2,941 rental housing units that were added to Morris County's housing inventory. This 7.2% increase in rental housing supply was lower than the overall growth rate, meaning that new housing units were disproportionately owner-occupied.

According to the *New Construction Residential Sales 2014 Summary Update* released by the Morris County Planning Board[3], there were 373 new residential units sold, a decrease of 23.6% from 2013. Sales of all single-family units, single-family attached units, and multi-family units declined between 2013 and 2014. However, sales of new single-family detached units declined only slightly compared to the significant decline in single-family attached and multi-family housing. As a result, single family detached units increased as a percentage of all new units sold in 2014, from 46.1% in 2013 to 58.7%. Correspondingly, sales of new single-family attached units fell as a percentage of the total, from 32.4% to 26.3%, while new multi-family units fell from 21.5% to 15.0%[4]. The following figure shows new unit sales over time:

[3] Morris County Planning Board. "*New Construction Residential Sales 2014 Summary Update".* 2014. http://www.morrisplanning.org/boards/Planning/Publications/Morris%20County%20Housing%20Report%202003-2010%20Final.pdf

[4] ibid

Housing Unit Sales, 2003-2014



New single-family detached sales continued to be distributed throughout Morris County while most of the construction and sale of new single family attached and multi-family housing occurred in just a few communities. In 2014, the three top areas for sales of new-construction multi-family units in Morris County were Mount Arlington, Riverdale, and Madison/Wharton.[5]

In Parsippany, 62.3% of the municipality's 20,989 housing units were owner-occupied and 62.5% were single-family. These are lower homeownership figures compared to Morris County overall, indicating that there are more rental units and more multi-family units in Parsippany compared to countywide figures. Multi-family units were more likely to be renter-occupied: 6.18% of owner-occupied units were multi-family, compared to 90.3% of renter-occupied units.

The growth in homeowner units in Parsippany was higher than in the County overall. Between 2000 and 2013, 923 units were added to Parsippany's housing stock, indicating a 4.3% increase in total housing units. However, the rental housing stock actually shrunk by 816 units. This indicates a decline in the proportion of rental housing in Parsippany.

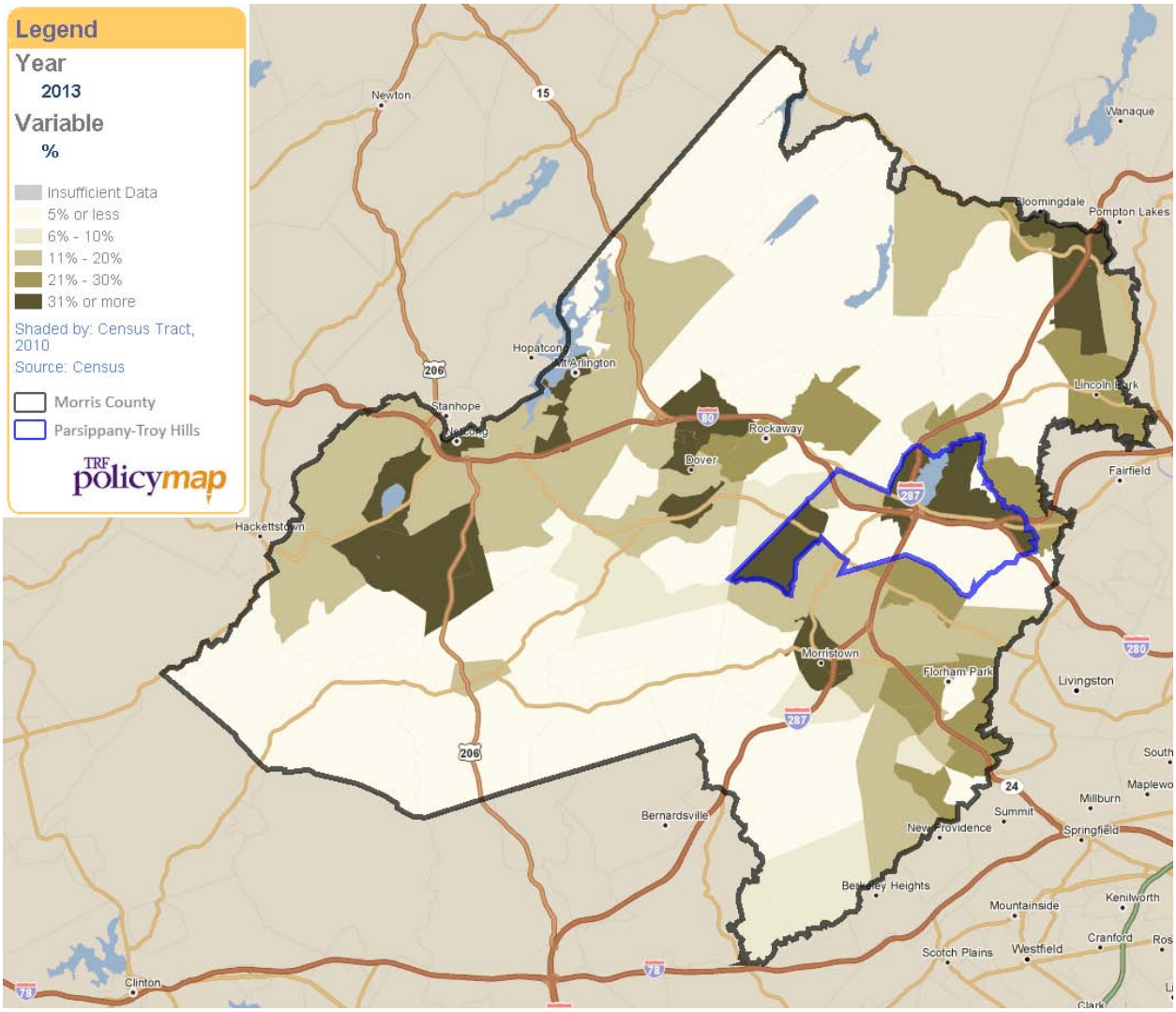
[5] Morris County Planning Board. "*New Construction Residential Sales 2014 Summary Update".* 2014. http://www.morrisplanning.org/boards/Planning/Publications/Morris%20County%20Housing%20Report%202003-2010%20Final.pdf

Units by Tenure and Type, Morris County, 2013									
	Owner-Occupied Units				Renter-Occupied Units				
	Total	Single-Family Units	Multi-Family Units	% Multi-Family	Total	Single-Family Units	Multi-Family Units	% Multi-Family	% Rental
Boonton town	2,032	1,885	147	7.2%	1,146	280	866	75.6%	56.4%
Boonton township	1,327	1,287	30	2.3%	179	134	38	21.2%	13.5%
Butler borough	1,988	1,785	203	10.2%	836	56	780	93.3%	42.1%
Chatham borough	2,331	2,294	37	1.6%	575	140	435	75.7%	24.7%
Chatham township	3,378	2,912	466	13.8%	616	109	507	82.3%	18.2%
Chester borough	427	394	2	0.5%	132	40	91	68.9%	30.9%
Chester township	2,458	2,443	15	0.6%	11	0	11	100.0%	0.4%
Denville township	5,676	5,346	323	5.7%	810	401	409	50.5%	14.3%
Dover town	2,451	2,228	223	9.1%	2,962	889	2,073	70.0%	120.8%
East Hanover township	3,486	3,175	311	8.9%	394	238	156	39.6%	11.3%
Florham Park borough	3,118	2,977	141	4.5%	995	262	733	73.7%	31.9%
Hanover township	4,294	3,807	487	11.3%	774	328	446	57.6%	18.0%
Harding township	1,246	1,206	40	3.2%	183	115	68	37.2%	14.7%
Jefferson township	7,069	6,797	89	1.3%	692	378	314	45.4%	9.8%
Kinnelon borough	3,254	3,195	59	1.8%	364	147	217	59.6%	11.2%
Lincoln Park borough	3,083	2,503	563	18.3%	895	191	704	78.7%	29.0%
Long Hill township	2,512	2,414	98	3.9%	426	169	211	49.5%	17.0%
Madison borough	3,798	3,620	178	4.7%	1,667	334	1,308	78.5%	43.9%
Mendham borough	1,379	1,356	23	1.7%	276	109	167	60.5%	20.0%
Mendham township	1,880	1,849	25	1.3%	105	105	0	0.0%	5.6%
Mine Hill township	1,180	1,169	11	0.9%	76	42	34	44.7%	6.4%
Montville township	6,451	6,000	451	7.0%	1,027	325	702	68.4%	15.9%
Morris township	7,127	6,727	400	5.6%	1,105	438	667	60.4%	15.5%
Morris Plains borough	1,810	1,647	163	9.0%	309	85	224	72.5%	17.1%
Morristown town	3,197	2,381	816	25.5%	4,753	544	4,209	88.6%	148.7%
Mountain Lakes borough	1,155	1,123	26	2.3%	87	87	0	0.0%	7.5%
Mount Arlington borough	1,833	1,337	496	27.1%	544	39	505	92.8%	29.7%
Mount Olive township	5,868	5,738	130	2.2%	4,958	370	4,588	92.5%	84.5%
Netcong borough	683	671	12	1.8%	807	135	672	83.3%	118.2%
Parsippany-Troy Hills township	**12,882**	**12,065**	**796**	**6.2%**	**6,930**	**655**	**6,258**	**90.3%**	**53.8%**
Pequannock township	5,202	4,181	994	19.1%	1,088	207	881	81.0%	20.9%
Randolph township	6,727	6,579	148	2.2%	2,336	373	1,963	84.0%	34.7%
Riverdale borough	1,396	808	588	42.1%	334	94	240	71.9%	23.9%
Rockaway borough	1,723	1,570	111	6.4%	845	186	659	78.0%	49.0%
Rockaway township	7,542	6,501	978	13.0%	1,211	400	811	67.0%	16.1%
Roxbury township	7,084	6,707	377	5.3%	986	382	604	61.3%	13.9%
Victory Gardens borough	200	129	71	35.5%	355	109	246	69.3%	177.5%
Washington township	5,728	5,633	56	1.0%	722	338	358	49.6%	12.6%
Wharton borough	1,321	1,276	45	3.4%	858	238	620	72.3%	65.0%
Morris County	**136,296**	**125,715**	**10,129**	**7.4%**	**43,369**	**9,472**	**33,775**	**77.9%**	**31.8%**

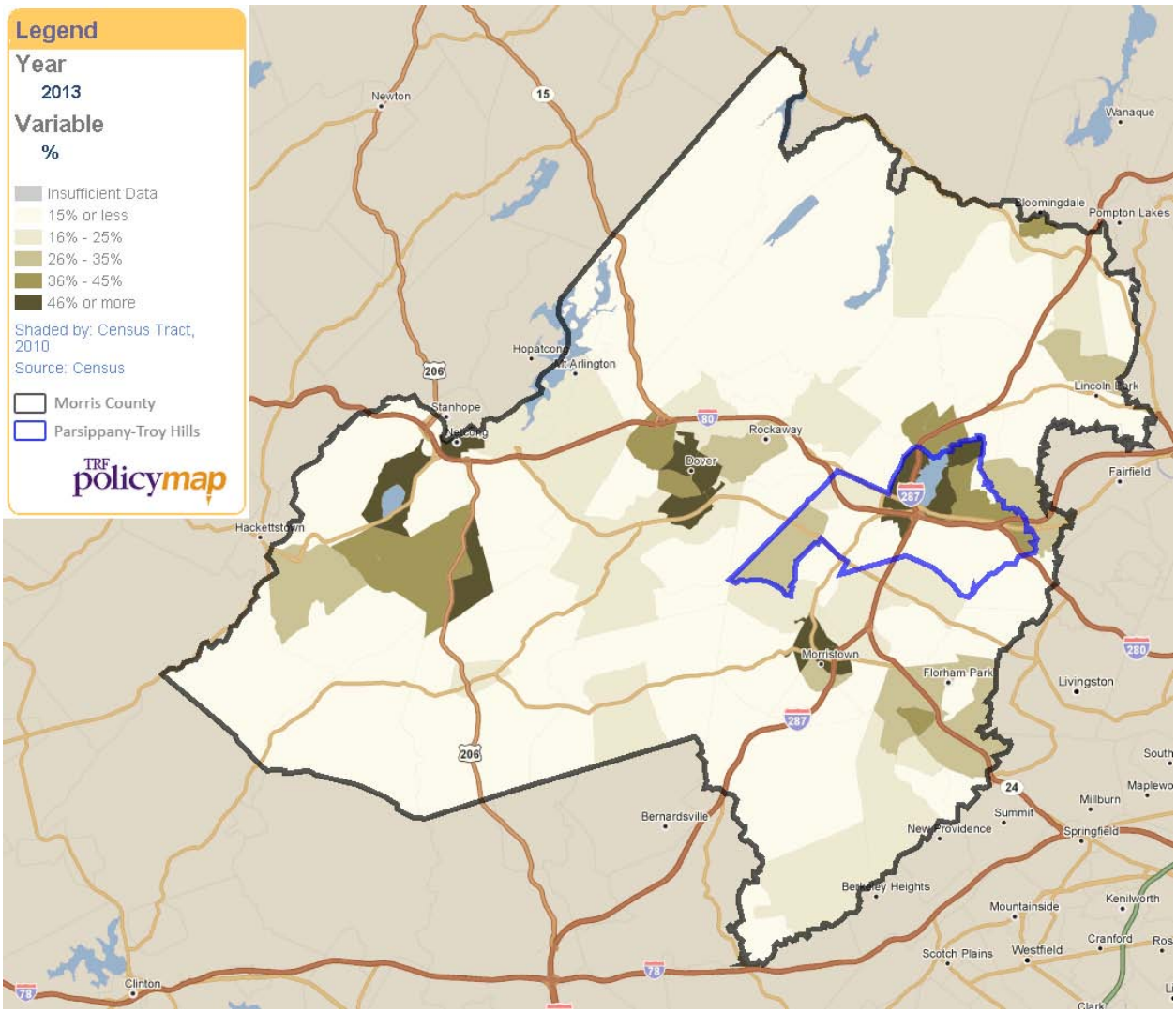
Source: 2009-2013 ACS B25032

Although owner-occupied family homes are more prevalent amongst the overall population of Morris County, there are large differences in homeownership rates between racial and ethnic groups. Specifically, non-White households are much more likely to be renters than White households. This trend is observed even in areas where the homeownership rate is very high among all racial and ethnic groups. Black households in Morris County were about 20% more likely to be renters than Whites, and Hispanic households were over 24% more likely. This trend was observed in most parts of the County. Outliers included the town of Morristown, where the rate of homeownership among Hispanics was higher than the rate among Whites. While White households were still more likely to be homeowners than Black households, the difference between the two groups was only 3.8%, a significantly lower differential than the County average.

Percent of Units that are Multi-family, 2013



Percent of Units that are Renter-occupied, 2013



Housing Cost

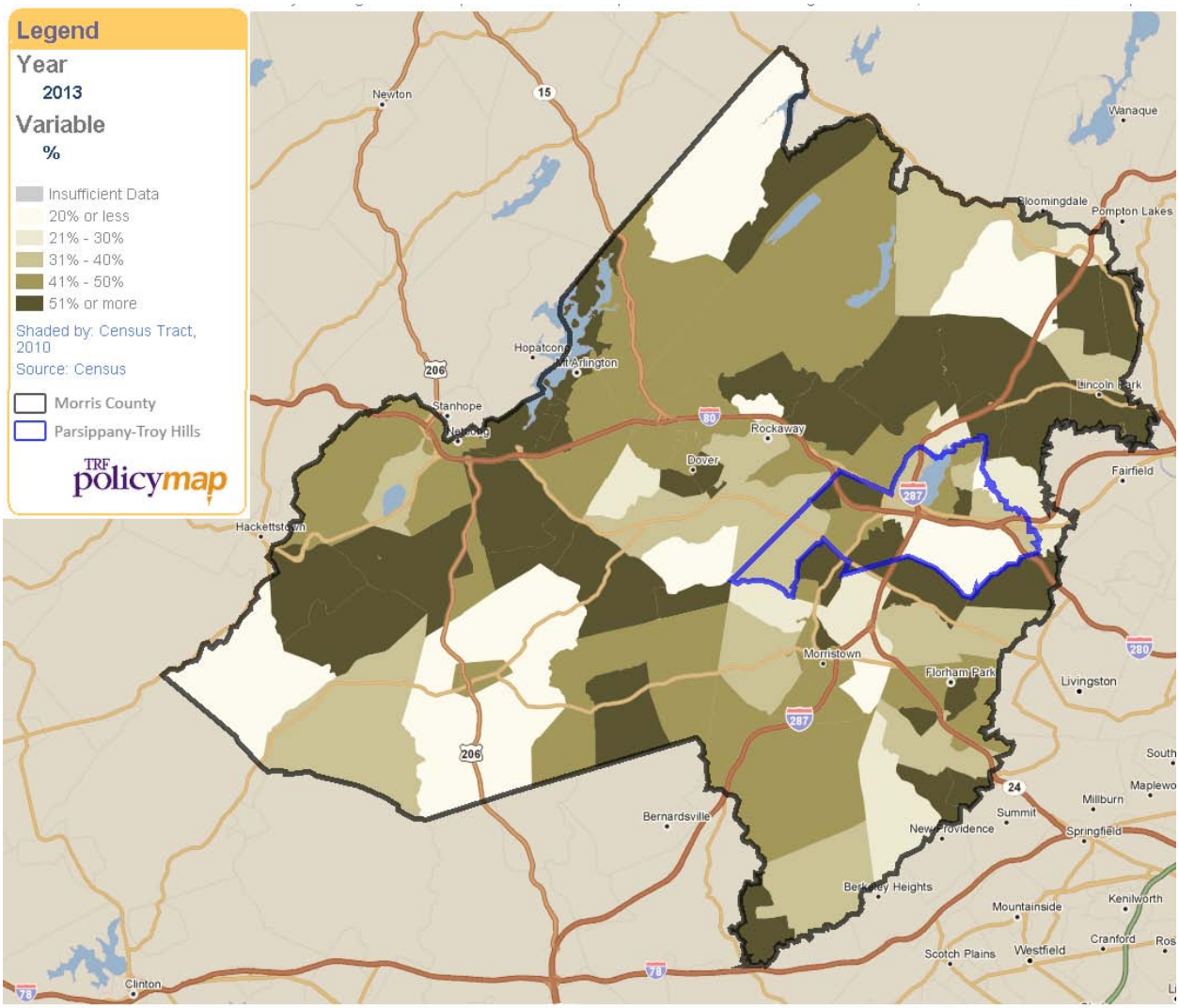
Increasing housing costs are not a direct form of housing discrimination, but a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of communities or neighborhoods because of a lack of affordable housing in other areas. When the cost of quality housing units is high, low-income and marginalized segments of the population are disproportionately more likely to become cost-burdened.

Income and Housing Prices, 2013			
	2000	2013	% Change
Morris County			
Median Household Income	$77,236	$98,633	27.70%
Median Owner Income	$89,412	$116,015	29.75%
Median Renter Income	$46,970	$55,638	18.45%
Median Gross Rent	$883	$1,339	51.64%
Median House Value	$257,400	$432,400	67.99%
Parsippany			
Median Household Income	$67,973	$83,329	22.59%
Median Owner Income	$83,894	$107,011	27.56%
Median Renter Income	$50,136	$56,316	12.33%
Median Gross Rent	$823	$1,190	44.59%
Median House Value	$234,100	$416,100	77.74%

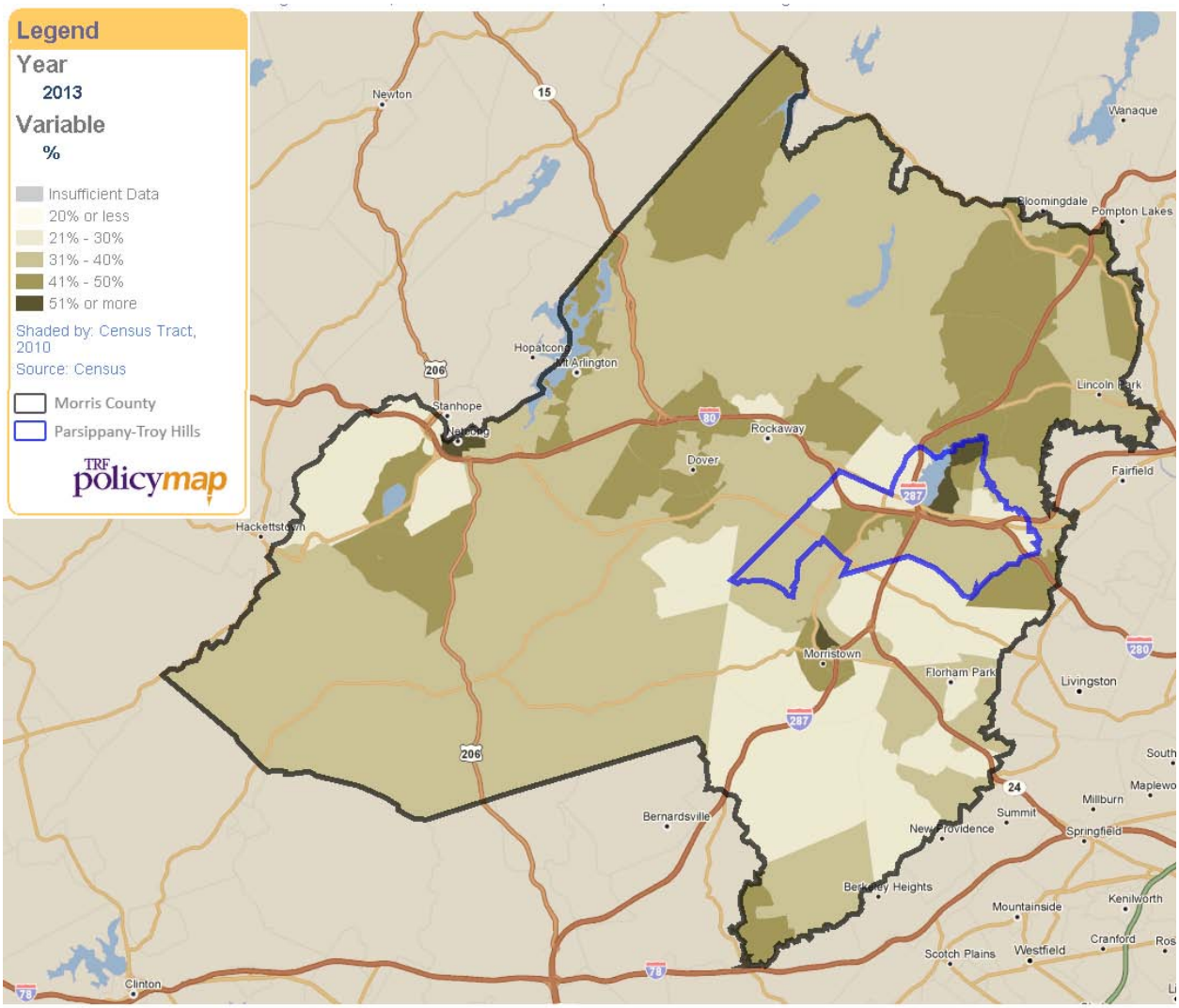
Source: 2009-2013 ACS S2503, B25119, B25064, 2000 Census HCT012, H063, H076

Cost burden is defined by HUD as paying more than 30% of one's income towards housing. Cost-burdened families may have difficulties paying for other necessities, such as food, clothing, transportation, and medical care. This occurs throughout the country for renters and homeowners alike, but is more problematic in areas where housing costs are high.

Percent of Renters that are Cost Burdened, 2013



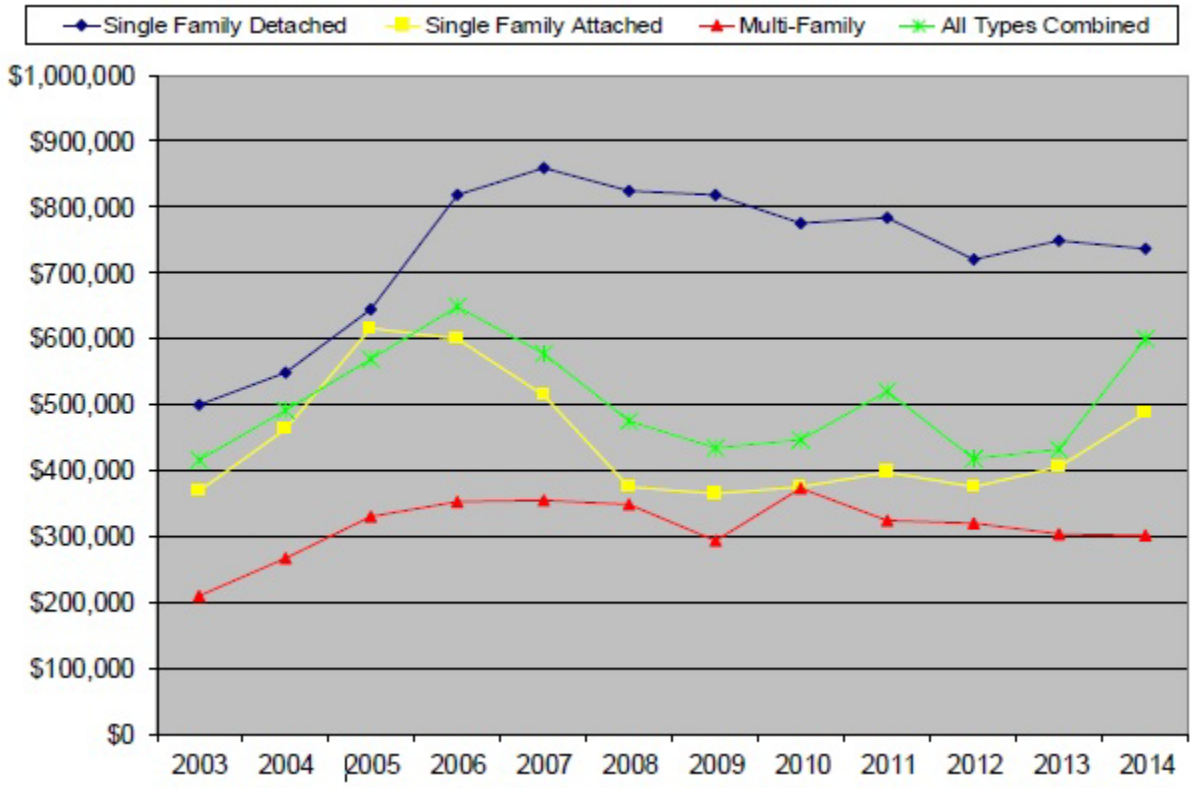
Percent of Cost Burdened Homeowners, 2013



Between 2000 and 2013, the median housing value in Morris County increased 67.9% and the median gross rent (includes estimated utility costs) increased 51.6%. However, during the same time period, the median household income increased only 27.7%. Even after adjusting for inflation, this means that median housing costs for both owners and renters are increasing at faster rates than median household incomes. As a result, income growth has not kept up with housing costs in Morris County, making housing costs relatively more expensive between 2000 and 2013.

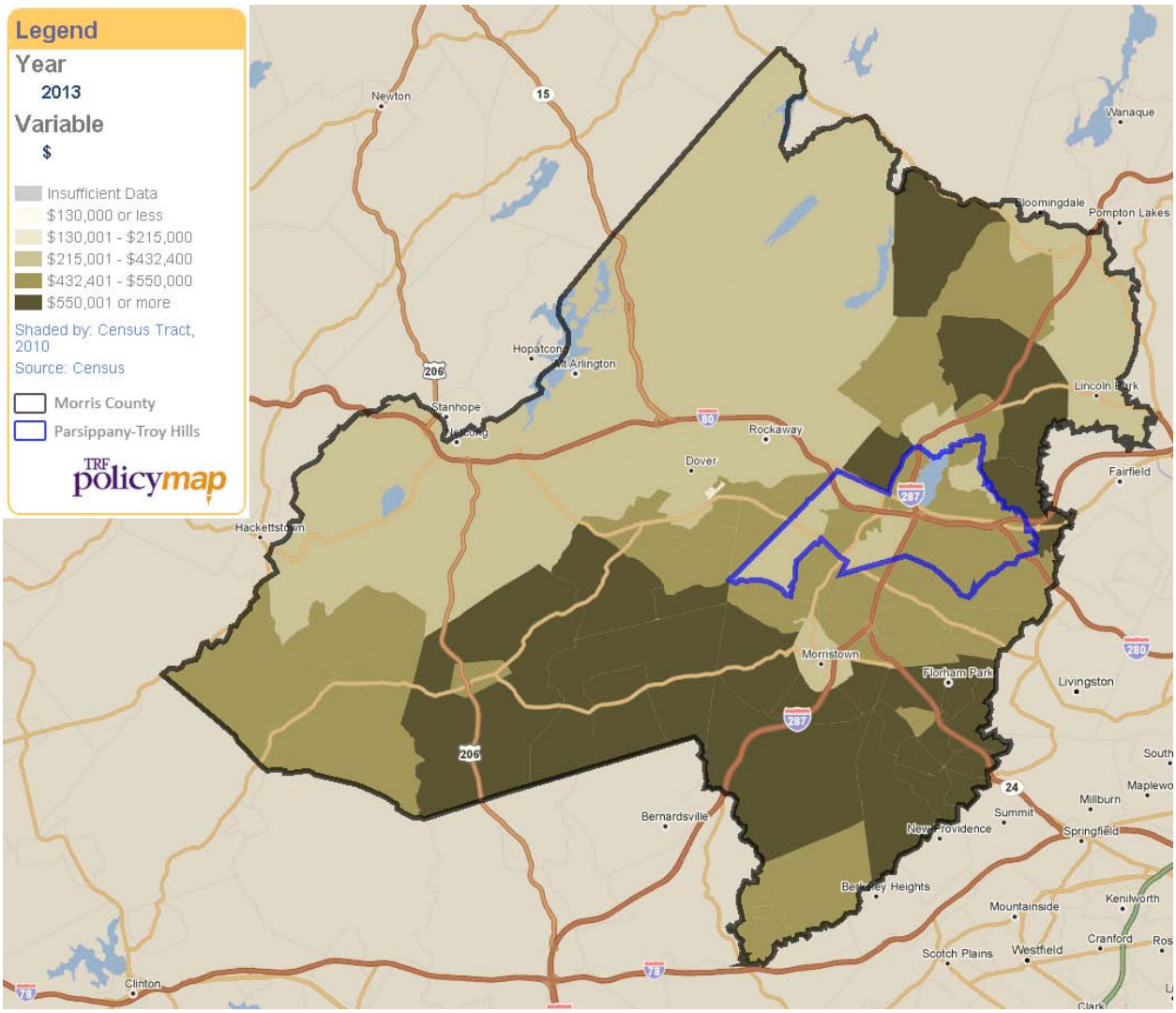
According to the 2014 Morris County *New Construction Residential Sales 2014 Summary Update,* the median price for all housing types combined increased from $432,500 in 2013 to $600,000. While this 38.7% increase may seem significant, this figure is strongly influenced by the rise of single-family detached housing as a percentage of all new units; this housing type is typically higher in price than the other housing types. Both single-family detached and multi-family housing saw small declines in median prices while single family attached experienced a relatively significant increase.[6] A graph of the change in median sales prices for new units by type is shown in the figure below.

Median Sales Prices, Morris County, 2003-2014

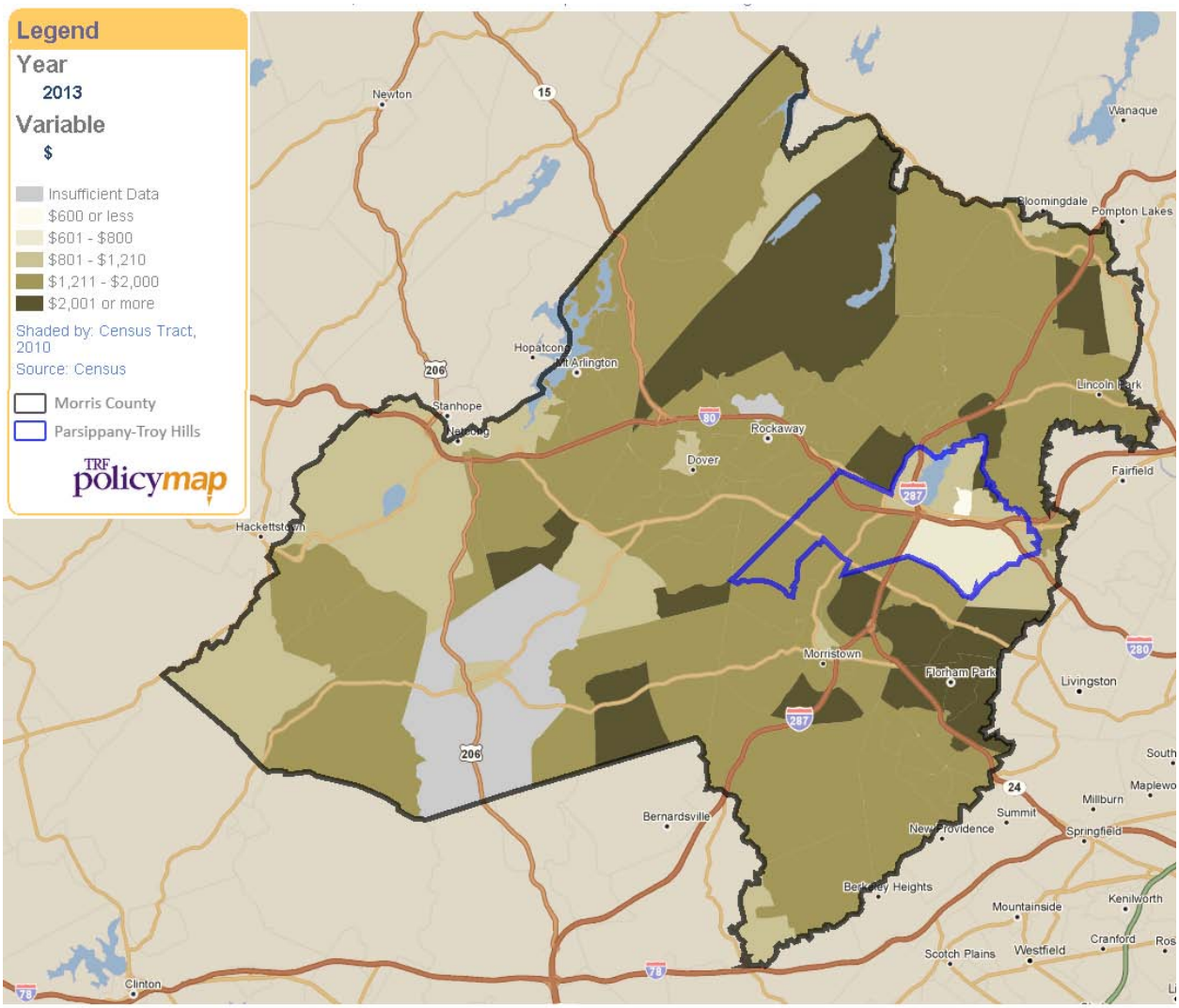


[6] Morris County Planning Board. "*New Construction Residential Sales 2014 Summary Update*". 2014. http://www.morrisplanning.org/boards/Planning/Publications/Morris%20County%20Housing%20Report%202003-2010%20Final.pdf

Median Rent, 2013



Median Home Value, 2013



This change in Morris County's housing costs differs by tenure. Between 2000 and 2013, the median household income for Morris County's homeowner population increased 29.7%. By comparison, the median household income for Morris County's renter population only grew 18.4% during the same time period. Comparing housing costs between owners and renters, the increase in housing costs has hit renters disproportionately, as median incomes among renters have been more stagnant than homeowners' incomes. This may be because, as discussed in previous sections, renters are disproportionately lower-wage earners, and wage growth in lower-paying positions has been slower in general.

The maximum monthly gross rent a household at the median renter income in Morris County would be able to afford would be $2,083. This is higher than the actual median gross rent of $1,339, indicating that the median renter income in Morris County is sufficient to pay the median gross rent. However, households below the median income will still find themselves priced out.

Between 2000 and 2013, Morris County lost 3,360 units renting at $699 or below. During the same time period, it gained 21,019 units renting for over $1,000. While some of this is due to inflation during this time period, inflation does not account for such a large redistribution of rental costs.

In Parsippany, both median house values and median gross rents are slightly lower than Morris County overall. However, median household incomes are also slightly lower, meaning that Parsippany residents are spending similar percentages of their incomes on housing. This has remained the case from 2000 to 2013. The rates of increase in median household income in Parsippany were lower than in Morris County, indicating that incomes are more stagnant in Parsippany than in Morris County. While rents have increased at a slower rate than in the County, they have still increased at a rate much higher than incomes. While the median renter's household income increased 12.3% between 2000 and 2013, the median gross rent increased 44.5%. Despite the median homeowner's household income increasing only 27.5%, median house values increased 77.4%.

The maximum monthly gross rent a household at the median renter income in Parsippany would be able to afford would be $1,407. This amount is significantly less than the maximum rent affordable by the median renter in Morris County. However, this figure remains higher than the actual median gross rent of $1,190, indicating that the median renter income is sufficient to pay the median gross rent. This is also true of Morris County as a whole.

Towns in Morris County containing large shares of lower-rent units (renting for under $699) include Boonton Township, Chester, Harding, and Pequannock. In these areas, lower-rent units comprise over 15% of total rental inventory. Areas with the lowest amount of lower-rent units are Chester Township, East Hanover, Kinnelon, Lincoln Park, Long Hill, Mount Arlington, Rockaway Borough, and Roxbury Township.

Housing Unit Size

Larger households can face impediments to fair housing choice, whether or not children are present. If a community has policies or programs in place that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, the restriction on the size of the unit will have an unbalanced negative impact on members of the protected classes.

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Morris County, rental housing stock tends to have fewer bedrooms than owner-occupied housing stock. Of the 43,369 rental units available in Morris County in 2013, only 18.9% had three or more bedrooms, compared to 82.1% of the owner housing stock. As detailed in the Familial Status section of the report, members of the protected classes are more likely to live in large households and require larger housing units in order to avoid overcrowding.

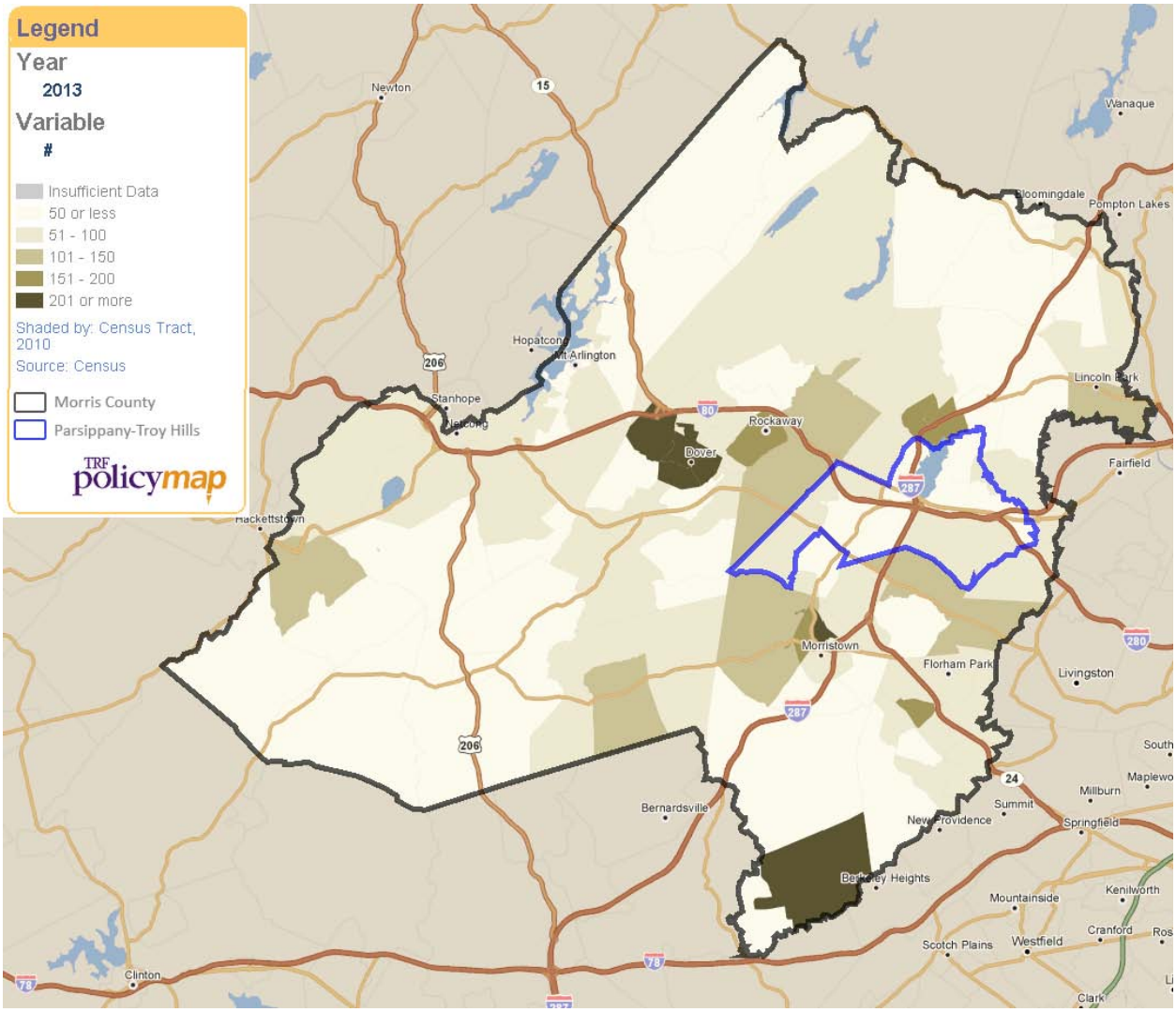
The median sizes for new single-family detached, single-family attached and multi-family units sold in 2014 increased by 3.3%, 13.8%, and 28.4% respectively, although multi-family unit development was limited overall. The construction of single family detached homes often involves the teardown of existing homes, in most cases to be replaced by significantly larger homes. In 2014, 28.3% of all new single family detached home sales were actually teardowns and rebuilds. This is down somewhat from 31.6% in 2013 and 31.0% in 2012. However, continued teardown and rebuilds may be expected due to a diminishing supply of vacant developable land coupled with an improving economy.[7] While this may add some larger homes to the existing housing stock, it may not necessarily improve housing choice for low-income households. New construction is generally significantly more expensive than existing housing, regardless of tenure, and the prices for the new units rebuilt on these parcels may be prohibitively expensive for large low-income households.

Parsippany's housing stock is similarly distributed, although the shortage of large bedroom units is even more acute. Of the 6,390 rental units available in Parsippany, only 6.6% have three or more bedrooms, compared to 82% of owner-occupied units.

Large families that require large units face tougher competition and may not be able to choose units strictly based on size but merely on availability and/or affordability. This can result in cost burden, overcrowding, or other housing issues for large families. Providing affordable housing for all Morris County residents can be accomplished by coordinating appropriate housing sizes to families' needs and resources. This includes supplying small, medium, and large units strategically and according to market demand in order to reduce stresses on the market.

[7]Morris County Planning Board. "*New Construction Residential Sales 2014 Summary Update".* 2014. http://www.morrisplanning.org/boards/Planning/Publications/Morris%20County%20Housing%20Report%202003-2010%20Final.pdf

Large Rental Units, 2013



Housing Age

Older housing typically requires more and more complex continual maintenance. In the absence of routine maintenance, older housing can quickly become substandard. A common age threshold used to signal a potential deficiency is around 50 years or more.

Overall, Morris County's housing stock is slightly older than the nation's, with the median year of construction six years older than the average American home (1969 in Morris County versus 1975 nationally). There is no significant difference in Parsippany, where the median year a structure was built also 1969.

While housing age is only slightly older, some areas of Morris County do have large inventories of pre-1970 housing stock. The housing stock in the towns of Boonton, Chatham, Madison, Mendham, Mountain Lakes, and Rockaway is comprised of over 80% pre-1970 housing stock. About 73.9% of Parsippany's housing stock was constructed prior to 1970. These areas may have unique rehabilitation needs.

Chapter 4: Public Sector Policies

Impediments to fair housing choice can take many forms. Some policies, practices, and procedures may appear neutral on their face but adversely affect the provision of fair housing in reality. An important element of this AI is an examination of public policies in Morris County and Parsippany-Troy Hills Township to determine opportunities for reducing obstacles to fair housing and furthering the expansion of fair housing choice.

Collectively, the CDBG, ESG, and HOME programs are under the authority of the Community Planning and Development (CPD) division of the US Department of Housing and Urban Development (HUD). Annually, each entitlement community engages in the development of an Action Plan to identify the eligible activities it will fund and implement with HUD CPD funds. In the past decade, funding from HUD has decreased and regulations have required more administrative capacity to address. This results in entitlements needing to "do more with less," including the goal of affirmatively furthering fair housing choice.

This section analyzes the local policies in place that guide how each entitlement affirmatively furthers fair housing as part of funding decisions through the Annual Action Plan (AP) and Five-Year Consolidated Plan (CP) processes.

State Policies

Fair Housing Act

In 1985, the State of New Jersey passed the Fair Housing Act (FHA), which requires every municipality in the state to provide its fair share of low- and moderate-income housing, outlines the procedures for compliance, and establishes the Council on Affordable Housing as an enforcement body. The Act was passed in response to the New Jersey Supreme Court's Mount Laurel II decision in 1983, which requires all municipalities to provide a realistic opportunity for the construction of affordable housing.

New Jersey Law Against Discrimination

New Jersey's Law Against Discrimination, enacted in 1945, prohibits discrimination in the housing market based on race, religion, color, national origin, ancestry, family status, sex, disability, marital status, gender identity or expression, affectional or sexual orientation, or source of lawful income or rent payment. Landlords in New Jersey are not, for example, allowed to turn away tenants who use Housing Choice Vouchers to help pay their rent. The law also requires landlords who own properties with 25 or more units to provide the New Jersey Division of Civil Rights (DCR) with an annual report on the demographic makeup of applicants and tenants and to describe any barrier-free aspects of the building. Housing discrimination complaints can be filed administratively with the New Jersey Division of Civil Rights, or with the New Jersey Superior Court.

Statewide Affordable Housing Policy

The Mount Laurel court decisions, first put forth by the NJ Supreme Court in 1975, held that zoning ordinances that made it physically and economically implausible to provide low-income and moderate-income housing were unconstitutional.[8] The second Mount Laurel decision from 1986 fashioned the "fair share" formula still used today to force municipalities to fulfill the obligation to provide affordable housing. Cases were transferred to the Council on Affordable Housing (COAH), which had been created by the Fair Housing Act of 1985.

According to Morris County Planning Board's *State of the County 2014* document, Fair Housing Act and COAH regulations have had a significant impact on residential development throughout New Jersey and in Morris County. Over 4,600 units of new affordable housing have been created in Morris County as a result of state housing policy. This housing was often constructed in conjunction with large numbers of market rate units needed to subsidize the affordable units, bringing high density housing development to many areas of Morris County where it might otherwise not have occurred.

Fair Housing Compliance and Infrastructure

This section analyzes the existence of fair housing compliance and infrastructure. This includes complaints or compliance reviews where a charge of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns.

Local Fair Housing Infrastructure

Local enforcement of federal fair housing policies is a necessary component of affirmatively furthering fair housing choice. The degree to which such enforcement occurs, along with the presence or absence of supplemental local policies and programs, varies slightly among the communities in Morris County, including Parsippany. Because Parsippany receives its own grant and manages it through its own offices, it is required to have its own local fair housing infrastructure.

The Morris County Office of Community Development helps to provide affordable housing opportunities to low- and moderate-income residents, including members of the protected classes, by overseeing and dispensing federal HUD funding to communities and qualifying individuals.

The Office conducts its operations as defined in its five-year Consolidated Plan, which it carries out through a network of partnerships with governmental and nonprofit agencies. These agencies include the five Morris County housing authorities, the Housing Alliance of Morris County, the Housing Committee of the Morris County Human Relations Commission, and the Comprehensive Emergency Assistance Strategy Committee. The Office is also responsible for ensuring that subrecipients are affirmatively furthering fair housing and expanding opportunity for members of the protected classes.

[8] The New Jersey Digital Legal Library. Rutgers University. "History of the Mt. Laurel Decisions". 2015. http://njlegallib.rutgers.edu/mtlaurel/aboutmtlaurel.php

Residents of Morris County and Parsippany can receive fair housing services from a variety of agencies. The County has an active Human Relations Commission. The Morris County Human Relations Commission promotes tolerance, diversity, communication, and appreciation for the many ethnic and cultural influences present in Morris County, including Parsippany. The Commission is comprised of 25 to 38 persons who live or work in Morris County. The Commission members include educators, elected government officials, police officers, representatives of women's organizations and diverse racial, ethnic and religious groups. A member of the Morris County Board of Chosen Freeholders sits on the Commission and members of the Prosecutor's office maintain a liaison. At least one is a student at a Morris County high school. Meetings are held bi-monthly in Morristown and are open to the public. Generally, meetings are only held if there is discussion required on issues of a complicated or urgent nature.

The Morris County Human Relations Commission has a special subcommittee that exclusively deals with fair housing and Section 8 source of income protection. The subcommittee directs persons interested in making a fair housing complaint to Legal Services of New Jersey. However, the Legal Services of New Jersey website contains no information on fair housing or information on how to make a fair housing complaint. Morris County should work with Legal Services of New Jersey to provide information for their website on fair housing, as part of their general fair housing education and outreach strategy.

In the past, the Commission waited for complaints to be brought to them and acted as a mediator. Recently, the Commission has become more proactive, adding education and outreach initiatives into their regular services. This includes working with county prosecutors, who have strengthened their relationship with protected classes—particularly the Black community in Morris County—due to high-profile national events involving race.

In addition, the Housing Partnership for Morris County, located in Dover, offers several housing services directly related to fair housing. This includes mortgage delinquency and default resolution counseling, non-delinquency post-purchase workshops, pre-purchase counseling, and pre-purchase homebuyer education workshops. These services are available in both English and Spanish, and are available for all Morris County residents.

The Urban League of Morris County, located in Morristown, offers additional housing services. This includes mortgage delinquency, default resolution counseling and rental housing counseling. Services are available in English and Spanish for all Morris County residents.

In addition to housing services, these groups provide education and outreach, sponsor community events, process fair housing complaints, and work to promote a mutual understanding of diversity among residents.

In December 2015, the Fair Housing Council of Northern New Jersey was awarded $302,487 to undertake a multi-year private enforcement initiative. While based in Hackensack, the Council covers the entirety of Northern New Jersey, including Morris County and Parsippany. The entitlements should coordinate with the Council to ensure fair housing initiatives are undertaken, if possible.

While many of these organizations and other subrecipients promote fair housing, the County is unsure about whether or not the Fair Housing logo is displayed on their marketing materials or in their offices. The County is not required to display the Fair Housing logo in its offices because it does not receive applications. However, its subrecipients (such as the Morris County Housing Authority, Habitat for Humanity, and Housing Partnership) are required by the Fair Housing Act to display the logo in their offices and on their marketing materials. The County should follow up with its subrecipients to ensure they are in compliance and displaying the Fair Housing logo properly. Because Parsippany administers a rehabilitation program, it must display the Fair Housing logo as well.

Organizations Providing Assistance

There are a number of public and private nonprofit organizations in Morris County that provide assistance to communities seeking to build affordable housing, as well as to individuals seeking to purchase such housing. This organizational network provides the majority of housing support in the County, many with the assistance of Morris County.

The clientele for the services provided by these organizations are disproportionately members of the protected classes. Representatives from many of these organizations were interviewed or consulted with for this document.

While not meant to be a complete survey, the following list—originally from the Morris County Planning Board's *State of the County 2014*—provides samples of the variety of such organizations within Morris County:

Primary Housing Organizations:

- Homeless Solutions, Inc.
- Morris County Affordable Housing Corp.
- Morris Habitat for Humanity
- Housing Alliance of Morris County
- Housing Partnership
- Lutheran Social Ministries of New Jersey
- Madison Affordable Housing Corporation

Special Needs Housing:

- Allegro School
- Allies, Inc.
- The ARC/Morris Chapter
- Cheshire Homes, Inc.
- Community Hope, Inc.
- The Eric Johnson House
- Family Promise
- Jersey Battered Women Services
- Market Street Mission
- Morris County Mental Health Association

- NewBridge Services, Inc.
- The Rose House

Fair Housing Complaint Analysis

The HUD Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act. The New Jersey Division on Civil Rights (NJDCR) also accepts complaints at the state level. Morris County itself does not accept fair housing complaints for its municipalities and the County is not actively notified of complaints filed in the County unless the complaint has been forwarded to the FHEO. However, the County will help residents contact the FHEO or NJDCR submit a formal fair housing complaint.

Housing discrimination complaint data for January 1, 2010 to November, 2015 was provided by the NJDCR. For that time period, NJDCR has not issued any findings of probable cause in cases filed by residents of Morris County. In addition, NJDCR is not currently involved in any state or federal court actions in housing discrimination cases.

The data revealed a total of 26 complaints in Morris County. Five complaints were filed by residents in Parsippany. Complaints can be made on multiple bases. The breakdown of bases of complaints follows:

- Disability: 17
- National origin: 5
- Race: 3
- Sex: 3
- Source of income: 2
- Creed: 1

Complaint data from HUD has been requested and will be analyzed once it is made available.

FBI Hate Crime Data Analysis

The Federal Bureau of Investigation (FBI) maintains detailed information on hate crimes. The FBI's Hate Crime Statistics Program included 15,494 participating law enforcement agencies in 2014. These agencies provided 1 to 12 months of data about bias-motivated crime, and of those agencies, 1,666 (10.%) reported 5,479 incidents. While not every jurisdiction in Morris County submits information on hate crimes to the FBI, the database still provides useful information as to the existence and prevalence of hate crimes in certain jurisdictions. As noted in a recent FHEO correspondence to Parsippany, the existence of a hate crime may indicate negative or inhospitable environments for members of the protected classes.

In 2014, the most recent year for which data is available, nine agencies participated in the submission of hate crime data to the FBI. The most common bias motivation among participating agencies' populations was religion followed by race. Randolph Township had the most hate crime incidents. Parsippany had one recorded incident, alleging discrimination on the basis of religion. Details on the context of this case and whether or not it was related to housing are unavailable from the FBI.

Hate Crime Incidents by Bias Motivation, 2014							
	Race	Religion	Sexual Orientation	Ethnicity	Disability	Gender	Gender Identity
Denville Township	0	1	0	0	0	0	0
Madison	1	0	0	0	0	0	0
Mendham	1	0	0	0	0	0	0
Morris Township	0	1	0	0	0	0	0
Mount Olive Township	1	1	0	0	0	0	0
Parsippany-Troy Hills Township	0	1	0	0	0	0	0
Randolph Township	3	3	0	2	0	0	0
Riverdale	0	1	0	0	0	0	0
Roxbury Township	0	1	0	0	0	0	0
Total	**6**	**9**	**0**	**2**	**0**	**0**	**0**

Source: FBI Uniform Crime Reports 2014

Note: Data available for participating agencies only

Local Policies

Funds Expended on Fair Housing Activities

Examining the amount of total annual allocations spent specifically on fair housing provides insight into how communities prioritize their commitment to affirmatively further fair housing. Such activities include fair housing planning, preparing an Analysis of Impediments to Fair Housing Choice, providing fair housing education and outreach for staff, sub-recipients, and the general public.

In FY 2015, Morris County received $1,704,496 in CDBG, $589,936 in HOME, and $152,103 in ESG funds. The County typically divides its CDBG allocation among physical infrastructure, public services, public facilities, and the construction and rehabilitation of housing. The funds support activities located throughout the County, benefiting site-specific public facilities and infrastructure activities as well as public service activities to assist persons countywide.

The County applies its HOME funds to a combination of activities that have included tenant based rental assistance, operational support for community housing developers, and rental construction. All of the County's ESG funds go directly toward various shelters and homeless service providers. The Township received a FY 2015 CDBG allocation of $216,560, which it divided among owner-occupied housing rehabilitation, infrastructure, public facilities, and public services.

The Morris County Department of Human Services relies heavily on the Housing Alliance of Morris County. The mission of the Housing Alliance, which separated from the United Way in 2014, is to promote policy change, increase public knowledge, and develop innovative solutions to affordable housing through development. One of their primary initiatives is an annual bus tour for local officials of affordable housing sites in the County, meant to showcase affordable housing achievements as a way to demonstrate how attractive and unobtrusive affordable housing can be. It is unclear how much funding Morris County and Parsippany contribute to the Housing Alliance's operation.

According to the County's 2014 CAPER, the following additional activities were recently undertaken to address identified impediments to fair housing choice, although no dollar amounts were available:

- Fair Housing Committee created a video on challenges of gaining accessible housing. The Office of Community Development will continue to use the video as an educational tool.
- Annually, during Fair Housing Month, an informational mailing regarding fair housing is sent out to Morris County municipalities. The Committee also hosts an annual Tenant-Landlord- 'Know Your Rights' session.

Parsippany received $216,560 in CDBG funds. These funds typically support public facilities, infrastructure, public services, and affordable housing. The Township accesses HOME and Emergency Shelter Grant funds through Morris County. Section 8 funds as well as Low-Income Housing Tax Credits are administered directly by the Morris County Housing Authority. The McKinney-Vento Homeless Assistance program is administered through the Morris County Office of Temporary Assistance. Other resources that have been available to meet and complement the Township's needs include Township

funds, State Historic Preservation Funds, Local State Aid, New Jersey Environmental Infrastructure Trust, State Open Space Grant, State Clean Communities Grant, Morris County Historic Preservation Grant, Morris County Open Space Grant, Green Acres Funding, Energy Efficiency & Conservation Block Grant Program, and private donations.

Neither Morris County nor Parsippany specifies the exact amount they spend on fair housing activities in their recent planning and reporting documents submitted to HUD. Neither Morris County nor Parsippany's 2015-2016 Annual Plan includes specific fair housing activities (such as paired testing, education, or outreach) in the CDBG budget.

According to their most recent Consolidated Plans, both the County and the Township pledge to support the Housing Committee of the Morris County Human Relations Commission, whose mission is to act as an advocate and educator for fair housing. However, neither entitlement committed specific dollar amounts as part of their plans. Future expenditures related to fair housing should be tracked separately, and in measurable monetary amounts, in order to properly take credit for them in subsequent Analyses of Impediments, CAPERs, and other HUD-related documents. This recommendation applies to both Morris County and Parsippany.

Project Proposal and Selection

Communities can implement their commitment to affirmatively further fair housing through an application process that favors projects that improve fair housing choice.

Morris County allocates formula grant funds on a competitive basis. The County's CDBG funds may be used in any municipality within the County with the exception of Parsippany and the Town of Dover, which are separate entitlements. Its HOME funds may be used anywhere within the County. The County uses separate applications for CDBG, HOME, and ESG projects. It requires applicants to identify a national objective that the proposed project will address, and for projects benefiting low- and moderate-income residents, the application must specify how the project will meet income qualification requirements. Applicants must describe how the project will have an identifiable and measurable impact on an unmet critical need and what outcomes will ensue. Finally, the applicant must describe and demonstrate capacity in explaining how the project will be carried out.

Applications for property acquisition and new construction projects do not impose any specific priorities or scoring criteria for any particular geography or type of development. To affirmatively further fair housing, the County could more proactively direct the use of HOME funds by adopting criteria that would prioritize the expansion of affordable housing in areas of the County where it is less traditionally located. Particularly, the County could incentivize the construction or rehabilitation of rental housing for families in lower-poverty areas with access to employment and higher-performing school districts.

Morris County is in the process of updating its HOME policies and procedures, including its site and neighborhood standards policies, to be in compliance with the HUD Final Rule. The County will continue this process and complete its update as soon as possible.

Additionally, in order to protect its own certification to affirmatively further fair housing, the County will adopt language to clarify that municipalities participating in its CDBG program must have non-discriminatory zoning and land use practices and policies. The County should not provide CDBG or HOME funds to units of government that it knows to be perpetuating segregated settlement patterns.

Parsippany's CDBG funding may only be used within the Township. The Township receives a very small allocation of CDBG funds which has been allocated to the housing rehabilitation program. We coordinate with local organizations to reach out to groups with individuals who might be eligible and in need of housing rehabilitation. Applicants are required to satisfy a national objective and meet HUD requirements, including income requirements.

Program Access

Morris County is in the process of updating its affirmative marketing plan. The County is federally required to adopt affirmative procedures and requirements for all CDBG- or HOME-assisted housing with five or more units, per 24 CFR 200.615, and should adopt an affirmative marketing plan for rental and homeownership programs as soon as possible. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the County's policies
- A description of what the owners and/or the County will do to affirmatively market housing assisted by CDBG/HOME funds
- A description of what the owners and/or the County will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG/HOME-assisted units and to assess marketing effectiveness
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Morris County distributes "Affirmative Marketing Policies and Procedures" guidelines in its HOME project requirements to ensure that potential homeowners and tenants are made aware of available housing opportunities. It is unclear whether the policies and procedures apply to housing created or rehabilitated via the CDBG program or other County funding streams.

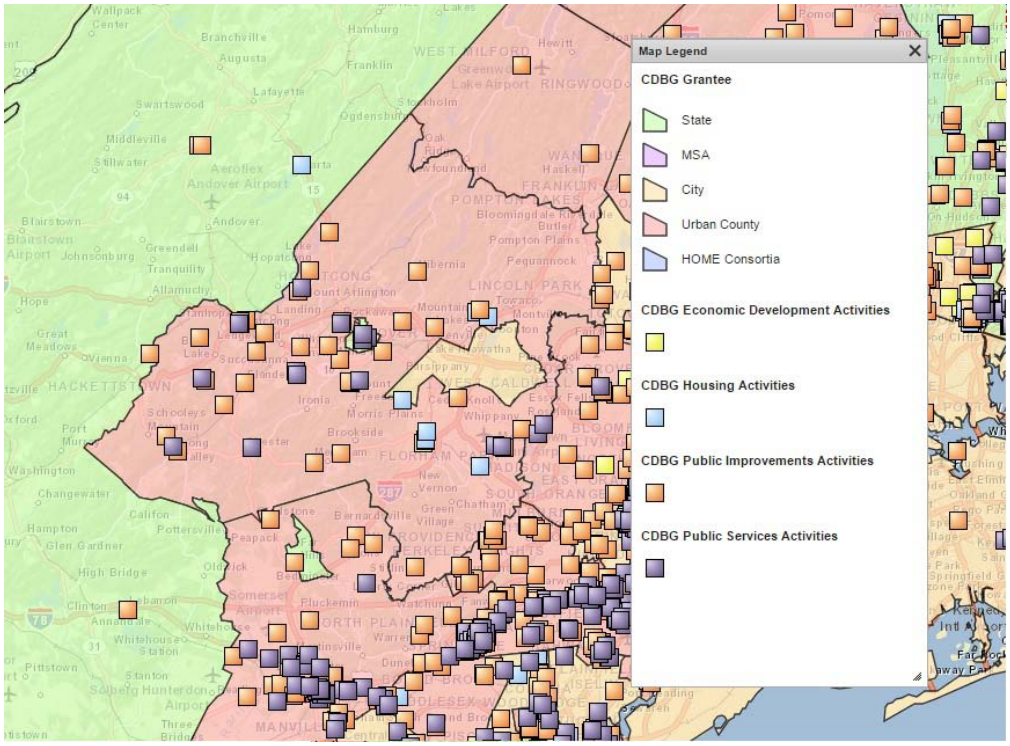
Geographic Distribution of CDBG and HOME Funds

CDBG and HOME investments are mapped in the figures below. Investments are located in eligible areas, with a broader geographic focus than RCAP areas.

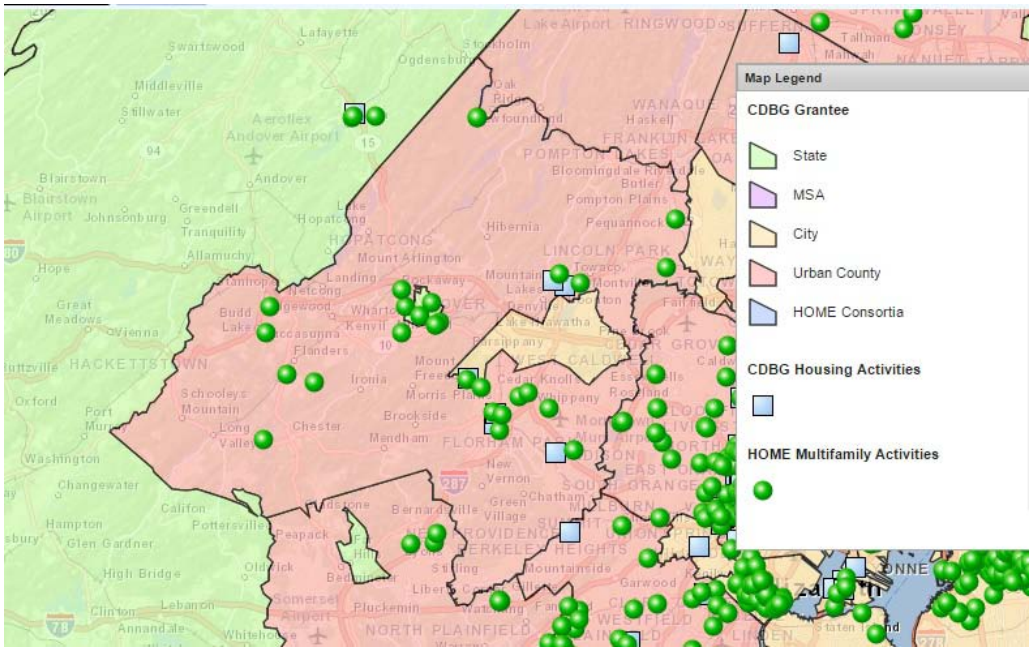
While low and moderate-income affordable housing developments are relatively dispersed throughout Morris County, many developments are concentrated in the Morristown area. While this may be positive due to Morristown's status as a major employment and transportation center in the County, the County should also continue to monitor its investments to ensure it is not perpetuating patterns of racially concentrated poverty.

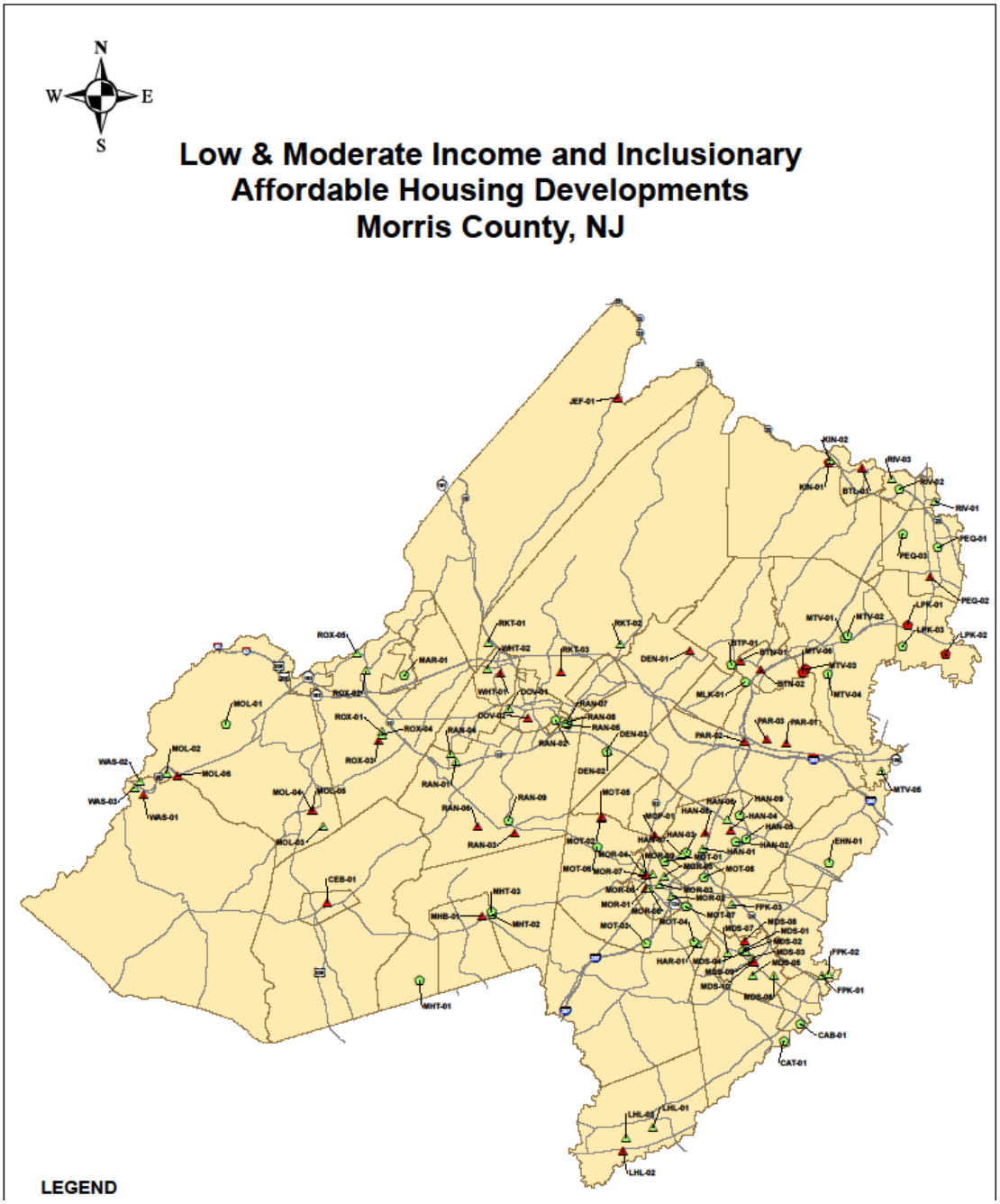
The three maps shown below indicate the locations of recent CDBG and HOME projects, as well as affordable housing developments in Morris County. Specific data on Parsippany was not available:

CDBG Activities by Type



HOME Activities by Type




N
W
E
S
Low & Moderate Income and Inclusionary
Affordable Housing Developments
Morris County, NJ
LEGEND

Addressing NIMBYism

Neighborhood opposition to new residential development is often referred to as a "not in my backyard" sentiment, or NIMBYism. Generally, it involves the proposed development of housing, usually government-subsidized but not always, with a target population that is different—racially, ethnically, economically, physically, and/or ability-wise—than the residents currently living in the neighborhood. Because NIMBYism often emerges during a land development situation (zoning, rezoning, site plan approval, special or conditional use permit, etc.), a brief discussion of NIMBYism in Morris County is included in this section of the AI.

Several stakeholders interviewed for the AI and Consolidated Plan reported the presence of neighborhood opposition to certain types of housing, particularly rental and multi-family housing. These types of housing are often affordable options that can expand housing choice residents who are lower-income, who are disproportionately members of the protected classes. While Morris County is overall relatively diverse compared to the nation, members of the protected classes comprise a very small percentage of the total population in many areas of Morris County. Where elected officials and other leaders do not recognize the benefit of providing subsidized or otherwise affordable housing in their communities, public policies will not change and segregated residential patterns will be allowed to perpetuate.

In some communities, NIMBYism may be a direct obstacle to the development of affordable housing and used to stop or seriously delay subsidized housing projects. This is particularly true of housing that must be placed in designated affordable housing districts, as specified in Parsippany's municipal code. The loss of time fighting the opposition may mean the loss of financing tied to deadlines and local community support. This situation can become a vicious cycle, whereby communities realize that their active opposition to affordable housing projects can achieve their desired outcome of no affordable housing being developed in their neighborhoods. The obstacles, or impediments, to fair housing choice remain in place and become stronger.

To the County's credit, the Morris County Office of Community Development has recognized the need to address NIMBYism. Because land use authority rests with municipalities in Morris County, the County can offer technical guidance on this matter but cannot mandate that a municipality amend its zoning ordinance. The County could potentially offer technical assistance on fair housing and affordable housing, such as zoning workshops on how to affirmatively further fair housing through zoning and land use. Ideally, each workshop should include an overview on how to revise a municipal zoning ordinance to make it more open and inclusive for people with disabilities, an aging population, building for the future, etc.

Monitoring

Entitlements can ensure that sub-recipients affirmatively further fair housing by requiring and enforcing compliance with fair housing statutes through sub-recipient agreements. Morris County has a well-developed monitoring system for ensuring that activities funded with CDBG, HOME and ESG meet the federal requirements for the grants programs. Each community funded under CDBG or agency funded under HOME or ESG must follow procurement policies that include outreach to MBE/WBE firms.

CDBG/HOME

All activities administered by the Morris County Office of Community Development are monitored as follows:

Planning: Proposed activities are reviewed for eligibility under statutory and regulatory requirements and for their ability to meet an identified need in the County's Consolidated Plan.

Implementation: Fiscal monitoring of activities include the review and approval of activity budgets; compliance with executed Grant Agreements and the subsequent review and approval of vouchers.

Long-term Compliance: Staff establish a monitoring schedule for HOME projects as required. Based on the monitoring schedule staff conduct site visits to ensure compliance with the following:

- Period of affordability
- Income of tenants
- Amount of rent charged
- Housing quality standards of facility

Each activity is filed separately under a general Compliance/Monitoring File.

The County attempts, to the maximum extent possible, to identify Minority Business Enterprises and Women Business Enterprises and implement outreach programs to ensure inclusion of these entities in all contracting activities of the HOME program.

Procedures include:

- Methods to identify certified minority and womens business enterprises
- Outreach program
- Record keeping
- Other activities

Staff visit facilities funded through CDBG to ensure continued compliance with the national objectives and applicable program requirements.

ESG

The three basic goals for monitoring progress and performance of ESG sub-grantees include:

- Ensuring that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met
- Ensuring compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities
- Enhancing and develop the management capacity of subgrantees.

The areas for monitoring and oversight include the following:

Eligible Activities Requirements - Ensure subgrantees are using ESG funds as originally planned and for eligible activities. Determine if costs are properly classified and if spending limits on certain activities have been properly adhered to. Ensure that the activities funded by ESG benefit homeless persons and that they are provided at a reasonable cost. Specific components that are monitored include:

- Financial Regulations - Ensure subgrantees are appropriately following financial management requirements.
- Program Disbursements - Ensure that subgrantee draw down funds in compliance with requirements.
- Procurement and Audits - Ensure that subgrantee comply with such requirements.
- Conflict of Interest, Environmental Compliance, and Other Federal Requirements - Ensure that subgrantee complies with these requirements.

This monitoring protocol includes the following:

- Physical site inspections of the subgrantee activity locations to observe and ensure compliance with the current grant agreements.
- Review of subgrantee site client files.
- Interviews with subgrantee staff.
- Review of job titles and job descriptions for all ESG funded positions, ensuring that the disbursed ESG funds are being utilized while fulfilling all program policy guidelines.

The monitoring process includes the following:

- Formal and advance notification of the visit
- Coverage of the areas outlined
- Clear conclusions and recommendations provided to the grantee following the visit

While this monitoring is comprehensive, goals to affirmatively further fair housing choice are not explicitly mentioned in the monitoring and evaluation procedure. When applicable, Morris County should explicitly check subgrantees to ensure they are fulfilling their obligation to affirmatively furthering fair housing choice.

Morris County's updated 2015 subrecipient agreement contains clauses that mandate compliance with Title VI of the Civil Rights Act, Section 104(b) and Section 109 of Title I of the Housing and Community Development Act of 1974 as amended, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Executive order 11063 and with Executive Order 11246 as amended by Executive Order 11375 and 12086. A nondiscrimination clause is also included. A specific fair housing clause in the subrecipient agreement makes the obligation to affirmatively further fair housing explicitly clear.

According to Parsippany's 2015-2019 CP, the Township has developed standards and procedures for ensuring that the disbursement of its CDBG funds meets the purposes of the appropriate legislation and regulations. The Township's standards and procedures for monitoring are designed to ensure that:

- Objectives of the National Affordable Housing Act are met.
- Program activities are progressing in compliance with the requirements for each program.
- There is compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing.

Testing

Since 2004, the New Jersey Division on Civil Rights has participated in a work-sharing agreement with HUD that makes federal funds available to New Jersey for the reimbursement of housing investigations dual-filed under both federal and state statutes. This agreement was granted by HUD after statutory amendments to the LAD and regulatory changes were made to render New Jersey law's 'substantially equivalent' to the federal Fair Housing Act. The Division's Housing Investigations Unit effectively enforces new housing initiatives and handles the significant number of housing discrimination cases received by the Division as a result of the Division's work sharing agreement with HUD. This specialized enforcement unit is responsible for combating and enforcing housing discrimination in New Jersey.

The last major testing initiative for Morris County and Parsippany was conducted in 2007, by the New Jersey Division on Civil Rights. Results on a statewide basis were released in a report entitled "New Jersey Fair Housing Report: Housing Discrimination Enforcement and Initiatives in 2007.[9]" However, this testing is completed on a statewide basis. No local testing in Morris County or Parsippany has been conducted in recent years. Given the presence of fair housing complaints in Morris County, the County should consider allocating a portion of CDBG funding for paired fair housing testing. Because the most common complaints involved disability status, national origin, and race, these protected classes would be the most critical factors to test for in the private housing market. Furthermore, given the recent award to the Northern New Jersey Fair Housing Council, funding for paired testing pay be available. Both Morris County and Parsippany should coordinate with the Council to examine the feasibility of conducting local fair housing testing.

[9]New Jersey Division on Civil Rights. "New Jersey Fair Housing Report: Housing Discrimination Enforcement and Initiatives in 2007". 2007. http://www.nj.gov/oag/dcr/downloads/Fair-Housing-Report-2007.pdf

Comprehensive Plan Review

New Jersey's Municipal Land Use Law (MLUL) permits local units of government to develop a comprehensive plan that outlines the community's vision for future development and preservation of existing assets. Because comprehensive plans guide a community's development priorities, it is important that the plan affirmatively furthers fair housing.

In New Jersey, comprehensive plans must include, at a minimum, a statement of goals and objectives and a land use element. The MLUL requires local units of government to include additional information, such as housing, transportation, and recreation elements, "where appropriate." Additionally, New Jersey's Fair Housing Act requires municipalities to outline their affordable housing needs and goals in a Fair Share Plan, which can be included as part of the comprehensive plan.

Morris County Comprehensive Planning

Morris County's Master Plan contains a Future Land Use Element that deals explicitly with housing. An explicit goal of the plan is to provide housing for a variety of individual choices in life styles and living spaces. This translates to allowing "adequate provision for other types of housing [as opposed to single-family detached] in sufficient numbers to provide a choice for all residents". While this is not an explicit commitment to affirmatively further fair housing, the plan does encourage a variety of housing types.

While encouraging multiple types of housing is positive, Morris County should amend its comprehensive plan to include goals for integrating affordable housing into its communities. All municipalities in New Jersey are inherently subject to "fair share" requirements regardless of whether or not the comprehensive plan addresses it. Planning for affordable housing development in the County's master plan would increase the likelihood of these developments being successful, increasing quality of life for both members of the protected classes and other residents.

Transportation is another critical element of Morris County's comprehensive plan. Connecting transportation systems with affordable housing is one of the foremost ways to expand opportunity and housing choice for members of the protected classes. Morris County's comprehensive plan lays out the goal of increasing availability of bus and rail transportation, and the master plan has a specific transportation element.

Parsippany Comprehensive Planning

Parsippany's Master Plan was adopted in late 2014 as a reexamination report to comply with the State's Municipal Land Use Law. It is an update to the policies and land use goals set forth in the 2004 plan, although slight recommendations regarding the Township Land Use Plan and zoning ordinance regulations are made.

The Master Plan's Housing Element expresses the preferred density, intensity, and character of residential neighborhoods. Multi-family housing is explicitly addressed and discussed in the Land Use Issues section. The comprehensive plan acknowledges the importance of multifamily residential development, particularly for seniors and the disabled, and defines the location, type and character of

desired future development. It promotes a range of housing densities and types and supports mixed use developments, concentrated in corridor areas and connected to transportation.

However, Parsippany's comprehensive plan explicitly states that it will not plan for any more multi-family housing and townhouses due to the large percentage of the housing stock which is already devoted to these housing types except where it is determined to be in the best interest of the Township. The Township's policy is to continue to accommodate this broad array of housing pursuant to the specific delineations depicted on the land use plan map, but not to plan any additional multi-family and townhouse development beyond that which is depicted on the Plan. This policy is expressed in recognition of the broad range of housing in the community, and the fact that the Township has affirmatively addressed its low and moderate income housing obligation, as defined by the New Jersey Council on Affordable Housing, through the preparation and adoption of a Housing Element and Fair Share Housing Plan.

While Parsippany's zoning ordinance permits multi-family housing as long as it is in agreement with the Town's comprehensive plan, the comprehensive plan itself explicitly states that no additional multi-family or townhouse development will be sought by the Town. This effectively makes it impossible for townhouse or multi-family development to be developed in conjunction with the comprehensive plan. A broad range of housing types is necessary to provide housing provide options for a population as diverse as Parsippany's, and this policy limits the ability to develop potentially more affordable options in the Town. This policy of the comprehensive plan should be revisited and potentially revised.

Beyond the comprehensive plan, Parsippany has a COAH-approved Fair Share Plan that promotes affordable housing through inclusionary zoning, alternative living arrangements for the developmentally disabled, and housing rehabilitation through the CDBG program. The Town has also stated that it will continue to monitor and work with the present management companies of existing senior complexes in order to preserve the affordability of those units.

Zoning Risk Assessment

In Morris County, towns and boroughs have the ability to adopt local zoning ordinances. The County does not have authority over local zoning regulations. These ordinances are an important tool that communities can use to regulate land use and guide development.

Given that zoning ordinances govern the location and characteristics of various land uses, they have the potential to limit fair housing choice. Many common fair housing zoning issues are interrelated with affordable housing issues.

Because members of the protected classes are disproportionately affected by a lack of affordable housing, zoning that effectively restricts affordable housing development can be an impediment to fair housing choice as well. For example, many zoning ordinances place restrictions on the location of multi-family housing units, which often results in the concentration of affordable housing in low-opportunity areas. Affordable housing and fair housing choice are tightly linked, as low-income residents disproportionately tend to be members of the protected classes. Consequently, Parsippany's zoning ordinance was reviewed to identify potential impediments to housing choice and affordability. The analysis was based on topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities).
- Minimum lot size requirements
- Dispersal requirements for housing facilities for persons with disabilities in single family zoning districts.
- Restrictions on the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms.

Benchmarking

To evaluate the ordinances consistently, a benchmarking tool was used to assess the ordinance against ten criteria that are either common indicators of impediments or language that addresses impediments to fair housing choice. The indicators are based on best practices and recommendations from HUD's fair housing resource guide.

The full set of criteria includes:

1. Ordinance defines "family" inclusively, without a cap on the number of unrelated persons, with a focus on functioning as a single housekeeping unit

2. Ordinance defines "group home" or similarly named land use comparatively to single family dwelling units

3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing

4. Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions

5. Ordinance has a “Reasonable Accommodation” provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions

6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right

7. Ordinance does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)

8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to nonresidential zoning districts

9. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less

10. Ordinance does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district

Each criterion was assigned one of two values. A score of “1” means that the criterion applies to the zoning ordinance – i.e., the impediment was not present in the ordinance or that the positive measure was in place. A score of “2” means that the criterion does not apply to the zoning ordinance – i.e., the impediment was present or that the positive measure was not.

For example, a zoning ordinance would receive a score of “1” for providing residential zoning districts with a minimum lot size of 10,000 square feet, and a score of “2” for including exterior design/aesthetic standards for all single family dwelling units. The final benchmark score is a simple average of the individual criterion.

Results

The zoning ordinance of Parsippany contained mixed results. While some practices are in line with affirmatively furthering fair housing, other components of the ordinance may hinder these goals.

Regarding group homes and their regulation, Parsippany has a special category called "community residence for the developmentally disabled". These are permitted by right in any residential district. When the number of persons is between six and 16, the use becomes a conditional use. With fewer than six residents, no conditional use permit is required. As persons living in group homes should be entitled the same housing choices as persons without disabilities, this is in line with fair housing best practices.

Allowing multi-family housing by right in at least one residential district also furthers housing choice. In zone R-5, Parsippany allows for apartments at a maximum of two stories and 16 units. These types of units are commonly referred to as “garden apartments”, and can be affordable options that may appeal to lower-income households and members of the protected classes. Manufactured or modular units,

another affordable option, are not mentioned in the ordinance. The ordinance does not contain stringent exterior design standards that could potentially drive up the cost of housing.

The zoning ordinance does not restrict residential uses such as emergency housing, homeless shelters, or permanent supportive housing facilities exclusively to non-residential zoning districts. Rather, these facilities are allowed in residential districts. This allows the Town's most vulnerable residents, who are disproportionately members of the protected classes, to integrate within the larger community.

Parsippany defines "family" inclusively by not mandating that persons be related. However, a "family" is considered to be "one or more persons customarily living together as a single housekeeping unit, whether or not related to each other by birth or marriage". This definition is inclusive, but defines the number of persons living together as a family one person or more, regardless of unit size.

A "reasonable accommodation" policy is a policy that can be codified to allow applicants to request a waiver from zoning and regulations that create a hardship for persons with disabilities. For example, if an ordinance limits a group home use to 5 persons but an applicant is requesting a group home permit for 6 persons, the Town should be willing to grant an accommodation since the request is reasonable. Parsippany has no reasonable accommodation policy.

Minimum lot sizes can make housing units prohibitively expensive. A minimum lot size of ¼ acre or less, even if in only one residential district, can improve housing affordability for members of the protected classes. In Parsippany, the minimum lot size is two acres. This makes the price of housing more expensive, decreasing the opportunities for affordable housing options in the Town. The two PRD zones allow for owner-occupied townhouse development at a density ranging from four to seven units per acre. However, these zones are very small and highly specific.

Parsippany's land use distinguishes between special "affordable housing districts" and other types of districts. Development in these districts requires submission of an affordability plan, conformance to aesthetic standards, bedroom distribution requirements, and other additional regulations. While this may be to comply with New Jersey "fair share" legislation, affordable housing developments should be treated the same as any other type of residential development, and a distinction in the way they are regulated should not be made.

Overall, Parsippany's benchmark score was a 1.40, indicating moderate risk of discriminatory provisions. Although the ordinance has aspects that are known to promote fair housing, it also lacks other constructive measures. A high score does not necessarily reflect a high probability of impediments to fair housing choice, nor does a low score mean that impediments are unlikely to happen. The score primarily serve as an at-a-glace reference to judge a particular code against some of the most common fair housing zoning issues.

Parsippany's land use regulations and zoning ordinance may restrict affordable housing options. Because members of the protected classes are disproportionately affected by a lack of affordable housing, Parsippany's zoning ordinance may not fully affirmatively further fair housing choice for members of the protected classes. The zoning ordinance's definition of family, lack of a reasonable

accommodation policy, two-acre minimum lot size, and requirements of the affordable housing district have an disparate impact on lower-income residents, persons with disabilities, and alternative family types. Parsippany should review its ordinance for discriminatory impact and set a timeframe for eliminating them.

More information on the zoning risk assessment can be found in Appendix A.

Building Codes and Disability Access

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality and accessibility standards are enforced through the local building code and inspections procedures.

Federal housing regulations specify that residential structures having at least four multifamily dwelling units include features of accessible and adaptable design. This requirement applies regardless of whether the structures are privately owned or publicly assisted. Examples of these regulations include Section 504 of the Rehabilitation Act of 1973 and the federal Fair Housing Act. Such features include:

- Accessible building entrance on an accessible route
- Accessible and usable common and public use areas
- Usable doors
- Accessible route into and through the covered dwelling unit
- Light switches, electrical outlets, thermostats and environmental controls in accessible locations
- Reinforced walls for grab bars
- Usable kitchens and bathrooms

While local jurisdictions in many other states adopt and enforce their own building codes, Morris County administers and enforces the Uniform Construction Code of the State of New Jersey (NJAC 5:23), as well as the International Building Code and individual township ordinances. The International Building Code was adopted at the state level and applied uniformly across all jurisdictions in the state. The state does not allow any local variance procedure or local board of appeals; counties and municipalities may only interpret the code as provided by the state.

From a fair housing perspective, this is advantageous because developers of affordable housing can depend on consistent standards no matter where they choose to locate. Additionally, accessibility standards apply equally to all areas.

The International Building Code as adopted by New Jersey details standards for the accessibility of private housing structures that are consistent with Uniform Federal Accessibility Standards (UFAS) and Americans with Disabilities Act (ADA) accessibility guidelines, as well as International Code Council/American National Standards Institute (ICC/ANSI) accessibility provisions. The code identifies residential buildings that must comply with accessibility requirements.

Detached one- and two-family dwellings and buildings with less than five sleeping units are exempted from the accessibility standards. Each local jurisdiction in Morris County ensures compliance with state and federal accessibility statutes through construction plan review and field inspections. The State of New Jersey's Department of Community Affairs manages and enforces the building code

Public Transit

Households without a vehicle are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. In addition, households without access to a vehicle are primarily low-

income or moderate-income. Access to public transit is critical to these households. Without convenient transit, their employment is potentially at risk and their ability to remain housed is threatened. The linkages between residential areas and employment opportunities are key to expanding fair housing choice, particularly in racially or ethnically concentrated areas of poverty.

The vast majority of Morris County workers (79.2%) drove to work alone in 2013. There are still over 6,500 households in the County, however, without access to a vehicle. Renters are about five times more likely than homeowners to lack access to a vehicle, which correlates with renters' lower median income.

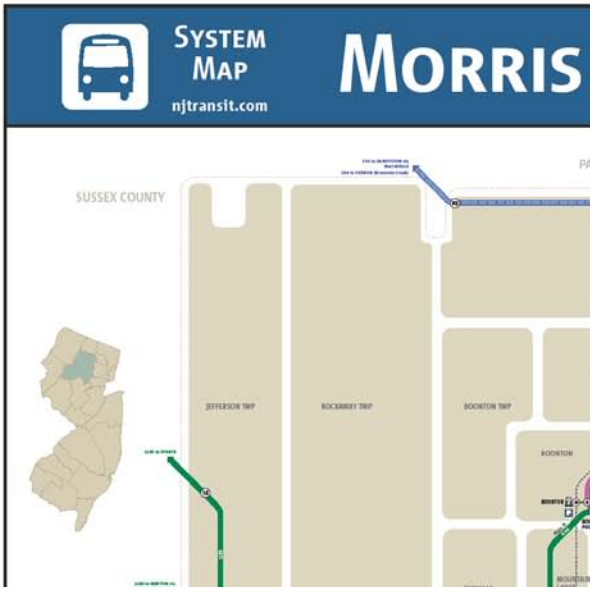
Although public transit ridership is generally low in the County (only 4.5% of workers), transit use varies greatly by race and ethnicity. While 9.4% of Black workers use public transit, only 4.3% of Whites do. Whites are much more likely to drive alone than members of other races. Interestingly, Hispanic workers are also more likely to drive alone, although Hispanics also have lower median household incomes. This suggests that White workers can choose between driving or public transit, while a disproportionate amount of members of other races may use public transit as their only transportation option.

Means of Transportation to Work, 2013				
Morris County		**Drove Alone**	**Carpooled**	**Public Transit**
	White	81.6%	6.1%	4.3%
	Black	76.1%	6.4%	9.4%
	Native American	42.6%	23.4%	7.4%
	Asian	73.7%	13.7%	6.2%
	Other Race	51.3%	34.0%	3.4%
	Two or More Races	64.5%	25.0%	3.9%
	Hispanic*	83.1%	5.0%	4.3%
Parsippany				
	White	85.5%	5.3%	2.6%
	Black	82.8%	4.5%	12.8%
	Native American	100.0%	0.0%	0.0%
	Asian	76.7%	14.6%	4.2%
	Other Race	78.9%	15.3%	0.0%
	Two or More Races	65.5%	20.7%	7.4%
	Hispanic*	86.4%	4.9%	2.8%

*Note: Hispanic ethnicity is calculated independently of race

Source: 2009-2013 ACS B08105

Morris County's primary bus transit system is run by NJ Transit, the statewide bus system. This includes service within Morris County, as well as service to Essex County, Passaic County, and New York City Port Authority. There are seven local bus routes and five regional bus routes. Fares are calculated on a zone basis starting at $1.60 for inter-zone travel. Discounts are available for seniors, disabled persons, and children. A map of public transit routes is shown below:


SYSTEM
MAP
njtransit.com
MORRIS
SUSSEX COUNTY
JEFFERSON TWP
ROCKAWAY TWP
BOONTON TWP
BOONTON

There are several other secondary bus systems operating in Morris County. These include Lakeland Bus Lines, Coach USA, the Parsippany Free Transit System, Colonial Coach, and Morris on the Move. The Morris Area Para-Transit System (MAPS) is also available, and assists the elderly and disabled. MAPS can also be used for transportation to employment, and a non-discrimination policy is explicitly written on the MAPS website. General ridership for MAPS is $1 per round trip. Parsippany operates a municipal dial-a-ride program for medical visits and senior citizens.

While the major population centers of Morris County are covered by at least one bus line, frequency and reliability for commuting purposes may be an issue due to lack of resources and limited operating hours. Parsippany is the most covered part of the County, with several bus lines converging in a small hub within the Town.

In a letter from the FHEO dated September 2013, the FHEO communicated that Parsippany's proposed strategies for overcoming the lack of accessibility to transportation to be severely insufficient. FHEO proposed working with social service agencies to make transportation accessible and affordable for members of the protected classes, as well as disseminating public transportation information in other languages. Also proposed was the establishment of a plan of action that includes measurable goals and realistic timeframes for implementing these suggestions.

Transit systems in Morris County and Parsippany actively make efforts to connect with major employment centers. This is particularly true of the six major industries targeted for growth in Morris County: biotechnology/pharmaceuticals, finance, health services, advanced manufacturing, and technology, and transportation/logistics. A map showing the major employment centers in these industries is presented in Appendix B. Transit lines pass through low-income areas and major employment centers, although the extent to which public transit is a viable commuting option from these areas is uncertain.

Several transportation-related planning initiatives have recently been started or implemented in Morris County. A corridor study of NJ Route 24 was completed in 2015, and focused on housing needs of the corridor and establishing transit-oriented development (TOD) principles near Morris County's train stations. There has been success implementing TOD in Morristown, which has a residential village near the Dover-Morristown train station. This is serviced by trains that travel directly to New York City, enabling commuters to access significantly more employment opportunities.

PHA Inventory

There are five Public Housing Authorities (PHAs) operating in Morris County. The Housing Authority of the County of Morris is by far the largest, and was created by the Morris County Board of Chosen Freeholders in 1972 to develop and manage housing for low and moderate income residents. The Authority serves the entirety of Morris County, including Parsippany. For over thirty years, the Authority has played a major role in providing affordable housing options to low and moderate income senior citizens, families and people with disabilities. Their mission is to enhance the lives of the citizens of the County by creating and sustaining decent, safe, and affordable living environments that foster stability and self-sufficiency for seniors, families, and people with disabilities with low to moderate incomes.

For areas where land and housing costs are generally very high, such as Morris County, public housing is an important resource for low-income residents. The Authority maintains 304 units of public housing across five developments, plus an additional 119 units in two rural developments that are not public housing. In total, the Authority operates 175 units for elderly residents ranging from studios to two-bedrooms, and 129 units available for families that are one- to three-bedrooms. In general, all of the Housing Authority's developments have consistently high occupancy rates.

According to interviews with HACM staff, all of the Authority's public housing stock is in good condition, with only minor rehab and regular maintenance needed. Average inspection scores are consistently high (89 and above).

The Authority has a Resident Advisory Board which provides input to the Authority's annual plan. Senior citizen groups are active at each of the elderly developments. The Housing Authority received a ROSS Grant and provides supportive services to foster independent living. A Family Self-Sufficiency grant also provides an avenue for resident involvement.

In addition to public housing developments, the Authority also manages a Section 8 Housing Choice Voucher program and manages 634 vouchers.

PHA Policy Review

An important element of the AI includes an examination of public policies in terms of its impact on housing choice. This section evaluates the public policies of the HACM to determine opportunities for furthering the expansion of fair housing choice.

Section 3 Plans

Section 3 of the HUD Act of 1968 requires that wherever HUD financial assistance is expended for housing or community development, to the greatest extent feasible, economic opportunities must be given to local public housing residents and low- and very-low income persons who live in the metropolitan area or non-metropolitan county where the assisted project is located. The policy is intended to direct the employment and other economic opportunities created by federal financial assistance for housing and community development programs toward low and very-low income persons, particularly those who are recipients of government assistance for housing.

Section 3 is also the legal basis for providing jobs for residents and awarding contracts to Section 3 businesses, which include businesses that are at least 51% owned by Section 3 residents, whose permanent, full-time employees include at least 30% current Section 3 residents, or businesses that commit to subcontract at least 25% of the dollar award to a Section 3 business concern. The opportunities provided can include job, training, employment or contracts.

Recipients of federal assistance are required, to the greatest extent feasible, to provide all types of employment opportunities to low and very low-income persons, including seasonal and temporary employment, as well as long-term jobs. HUD receives annual reports from recipients, monitors the performance of contractors and investigates complaints of Section 3 violations, examining employment and contract records for evidence of actions taken to train and employ Section 3 residents and to award contracts to Section 3 businesses.

In March 2015, HUD announced a new proposed rule to the federal Section 3 program, which would clarify certain provisions of the program and establish best practices in order to ease barriers to achieving compliance with requirements. According to the HUD registry, there is currently only one Section 3 business in Morris County. B&Y Consulting Corporation performs lead hazard control, asbestos removal, PCB removal, selective demolition services, and general contracting, and it is located in Morris Plains, NJ.

Other Assisted Housing and Expiring Units

In addition to public housing, there are housing units across the County that have received public financing, but are owned by private entities. Sources of public financing include HOME program funds, CDBG owner-occupied rehab awards, Low-Income Housing Tax Credits (LIHTC), Section 8 voucher subsidies, and more. LIHTC developments, which are assisted through the State's Housing Credit Program, form the bulk of privately-owned affordable housing stock. Morris County and Parsippany each have the option to contribute HOME funds to LIHTC developments in their respective jurisdictions. Regardless of the ownership arrangement, the assisted housing inventory in the County is a significant source of affordable housing.

Data from HUD's 2014 *Picture of Subsidized Households* shows the following data on assisted housing in Morris County:

Subsidized Housing Inventory, Morris County	
All HUD-Subsidized Units	3881
Public Housing	1041
Housing Choice Vouchers	1743
Mod Rehab	2
Section 8 NC/SR (Project-Based)	879
Section 236	5
Section 202	159
LIHTC*	936
Source: HUD, *2013-2014 Picture of Subsidized Households*	
*Note: Data on LIHTC is from 2013 due to changing classifications	

In terms of fair housing, the location of assisted housing can expand access to community assets or it can perpetuate residential segregation patterns. For example, affordable housing units planned and developed in high opportunity areas can facilitate access to better schools and jobs. On the other hand, affordable housing that is located exclusively in low opportunity areas restricts housing choice and residents' access to higher quality assets.

Expiring Affordable Housing Units

According to the National Low Income Housing Coalition's National Housing Preservation database on expiring project-based rental assistance (PBRA), which includes project-based Section 8, Section 202, Section 811, RAP, LIHTC, and HOME, there are 615 units in Morris County at-risk for conversion to market-rate units. In the absence of intervention to preserve the affordability of these units, this would occur when the rental assistance or affordability period expires within the next five years.

From 2015 through 2018, the National Housing Preservation database indicates that the affordability designation is set to expire for units funded through these programs. Because significant government funding has been invested in these properties, this housing is some of the most affordable housing in the County. Morris County will continue to monitor this database over the next five years to assess if and when any units could be lost due to expiring contracts and what actions the County can take to preserve these units.

Language Access Plans

Persons with limited English proficiency (LEP), including immigrants, may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers.

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons with LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Furthermore, recipients of federal financial assistance must develop a plan for persons with LEP to ensure that they have meaningful access to all portions of their programs or activities, not just those portions that receive HUD funds (e.g. non-federally funded programs). This is called a Language Access Plan (LAP).

According to HUD, vital documents should be translated into other languages spoken in the area when both:

- More than 1,000 persons in the eligible population or among current beneficiaries have LEP.
- More than 5% (or at least 50 persons) of the eligible population or beneficiaries have LEP.

Vital documents include any document that is critical for ensuring meaningful access to the recipient's major activities and programs by beneficiaries generally and persons with LEP specifically, such as a program application. Determining whether or not these criteria are fulfilled is known as a safe harbor calculation.

One measurement of persons with LEP is the degree to which persons over the age of 5 years speak English. The Census reports on the number of persons who speak English "very well," "well," "not well," and "not at all" by language category. Despite the prevalence of persons with LEP and the increased diversity among Morris County's population, some communities within the County have established very few provisions to accommodate persons with limited English proficiency. Many of the area's local government publications and other materials are not available in Spanish. The responsibility of identifying which documents are considered "vital documents" is left to each local unit of government.

The following table presents the results of a safe harbor calculation to determine the eligible population for persons with LEP in the municipalities in Morris County. While Spanish is by far the most widely spoken language after English in all parts of Morris County, other languages with high numbers of LEP speakers are also shown for reference. The estimated eligible population for each language group is based on the assumption that 100% of persons with LEP are potential recipients of County or regional services. Further analysis may reveal a smaller number. No safe harbor is assumed for oral interpretation.

Limited English Proficiency, 2013			
	Population 5 and Over	Limited English Proficiency	Percent with Limited English Proficiency
Morris County	468,603	42,587	9.1%
Parsippany	50,336	7,824	15.5%
Source: 2009-2013 ACS B06007			

As the table shows, there is a need to translate vital documents from English to other languages. Out of all persons with LEP, 52.3% of them spoke Spanish as their primary language.

The need for LEP services is higher in Parsippany than it is in Morris County overall, due to a higher proportion of the Town having LEP. Of the 7,824 LEP persons in Parsippany, only 20% were native Spanish-speakers. The remaining 80% spoke other languages. The leading languages spoken in Parsippany by LEP persons are Spanish (1,570 persons), Gujarati (1,317 persons) and Chinese (1,534 persons).

There are particularly high numbers of LEP Spanish-speakers located in Dover, Morristown, Victory Gardens, and Wharton. The proportion of LEP Spanish-speakers in all four of these areas exceeds 20% of the total population. Special efforts should be made in fair housing education and outreach in these communities.

While there are many languages other than Spanish spoken throughout Morris County, no other languages triggered HUD's safe harbor threshold. The Ancestry and Income section of this report details the language profile of LEP persons in more detail.

Language Access Plan: Morris County

The Morris County Office of Community Development completed its last LEP Four-Prong Analysis and Language Assistance Plan (synonymous with four-factor analysis and Language Access Plan) in June 2013. While the demographics of Morris County have changed slightly since then, they have not changed substantially enough to require an update of this LAP.

The research from this LAP indicates that the program LEP individuals are most likely to come into contact with are Morris County's Homeowner Rehab program. The Office has worked to make its programs accessible to Spanish speaking individuals. For the Homeowner Rehab program, a Spanish version of the program's brochure is available in hard copy and on the Office website. If an applicant with little English capability contacts the Office, staff contact family or friends who can communicate on behalf of the applicant. The Office partners with the Housing Partnership to administer the First Time Homebuyer program. The Partnership has Spanish speaking staff. In addition, the educational piece the Department is required to provide, regarding lead based paint, is available in Spanish.

Interpretation services will be provided when necessary for meaningful access for LEP clients. The County's Office of Temporary Assistance (OTA), which is also a subrecipient in the Emergency Solutions

Grant program, employs Spanish-speaking staff. If need be, the Office would reach out to OTA for interpretation assistance.

Assessments of the LAP are undertaken annually, at the time of the Consolidated Annual Performance Evaluation Report (CAPER), to ascertain whether population changes have occurred which would necessitate a reevaluation of the language assistance provided. A determination will be made as new language needs have emerged, necessitating translation and interpretation.

Language Access Plan: Town of Parsippany

As a Participating Jurisdiction, the Town of Parsippany is also required to have a Language Access Plan. In 2011, Parsippany conducted a four-factor analysis and drafted a LAP in response to a HUD request.

The data from the LAP demonstrates that more than 70% of the Township's LEP population is Asian and that more than 20% is Spanish-speaking. Both of these criteria meet the threshold that requires written translation of vital documents.

The Township's Grants Administration Office also completed an informal, in-office survey to determine how many LEP persons visited or called the office, and what was their primary language, over a one-month period. This informal survey revealed that there are a small number of Asian as well as Hispanic speaking LEP persons contacting the Township of Parsippany-Troy Hills.

Because the Township provides Asian-language and Spanish-language speaking staff through the Parsippany Library, it is cost effective for the Township to provide language translation of all vital documents and many others that, while not vital, may be beneficial to a client. However, there have been a limited amount of requests up to the present time. The Township will also utilize any documents provided by HUD in languages other than English. The Township has provided in the past and will continue to retain the services of a professional interpretation service to provide oral interpretation in other languages if and as needed.

The Township conducts outreach in a method that is inclusive of LEP persons identified through its ongoing analysis. All public notices and marketing advertisements, such as the availability of housing rehabilitation program application, are published in other languages as well as English, and the Township will publish these in the appropriate local media or Township website.

The Township may also participate in community-sponsored events, and make presentations through community organizations to target LEP persons and ensure they are aware of the availability of LEP assistance.

For clients who are LEP but do not speak a language identified, the Township's Grants Administration Office has a document created by the US Census Bureau translated into various different languages to use as a tool to identify the client's primary language. The Township also seeks translation of a notice announcing the availability of primary language assistance into as many languages as possible to be posted in the lobby. Until this is achieved, the Township posts the notice in English.

Progress since Previous AI

Morris County

Morris County's 2010 Analysis of Impediments to Fair Housing Choice identified a number of impediments to fair housing choice, including:

- The lack of affordable housing, particularly for low- and middle-income households, seniors, people with disabilities, single head of households, and young adults.
- A need for accessible/adaptable housing for persons with severe mental illness and the developmentally disabled, victims of domestic violence, veterans, people transitioning out of homeless shelters, and the frail elderly.
- A lack of housing accessible to affordable transportation to get to jobs and services, particularly for senior citizens, people with physical disabilities and mental illness, low-income families, and any other resident who does not have ready access to their own automobile.
- Banks have tightened lending guidelines to the point where obtaining a standard fixed mortgage is very difficult. This further impedes the process of acquiring affordable housing for those who may have been viable candidates.
- In 2014, HUD reported that 64 discrimination cases had been filed pursuant to the Fair Housing Act (Title 8) in New Jersey from 2004-2010. The breakdown of protected classes included Disability (24), Family Status (11), National Origin (9), Race/Gender (19) and Sex (1). 26 cases had been dismissed for No Cause.
- Public policies can present barriers to affordable housing, such as insufficient federal and state resources for affordable housing initiatives, zoning ordinances that are restrictive rather than flexible, difficult development approval process, and high impact fees.

To increase the supply of affordable housing throughout Morris County, the County delivered some form of affordable housing assistance to 189 households in FY2014 and 183 households in FY2013, according to recent CAPERs. For FY2015, the County plans to spend over $1 million on housing assistance to benefit 460 households.

Morris County used its federal funds to address "worst-case" housing needs and housing needs of persons with special needs including:

- Repaired major home systems of income eligible homeowners.
- Funded construction and rehabilitation of rental units for people with special needs.
- Funded energy and safety improvements in group home for people with special needs.
- Provided HOME funds for such housing activities as Tenant Based Rental Assistance (TBRA) to assist very low income renters.

In the FY2015 Annual Plan, the County has committed to fund public service providers such as the Special Homes of NJ group home, the Daytop Village Youth recovery program, the Zufall Health Center, Jersey Battered Women's Service's children's program, scholarships for Cedar Hill Summer Camp, CASA

of Morris and Sussex Counties, Deirdre O'Brien Child Advocates Center, and child care at Children on the Green, Homeless Solutions, and Morristown Neighborhood House. In addition, the County has budgeted $143,192 in Tenant Based Rental Assistance and $152,103 in emergency shelter operations.

In response to the number of fair housing complaints in the County and local municipal policies that were not designed with fair housing intentions, the County's Human Resource Commission revised its approach to fair housing advocacy. In the past, the Commission has waited for a complaint to be filed, and then acted as a mediator. Recently, the Commission has become more proactive to educate and actively prevent discrimination. For example, the Commission undertook an ambitious education and awareness campaign on human trafficking before the 2014 Super Bowl; worked with the community college to change its policy restricting undocumented students; worked with the police department to draft policies regarding body cameras; and, worked with the Office of Emergency Management to provide resources to respond to social crises.

To increase fair housing awareness, the Fair Housing Committee sends an annual informational mailing during Fair Housing Month regarding fair housing to Morris County municipalities. The Committee has also sponsored the following events:

- An annual bus tour of affordable housing sites in the County for local officials, for the purpose of demystifying the stigma of affordable housing
- A breakfast honoring landlords
- Renter tester training
- A cable TV presentation on fair housing
- The annual essay contest where local high school students write about anti-discrimination
- A video on the challenges of gaining accessible housing used by the Division of Human Services as an educational tool

Parsippany

Parsippany-Troy Hills Township's 2011 Analysis of Impediments to Fair Housing Choice identified six impediments to fair housing choice:

- Fair housing complaints
- A lack of affordable housing
- A lack of accessible housing for special needs populations
- A lack of affordable transportation options
- Difficulty obtaining private home loans
- Restrictive land use regulations

To address the lack of affordable housing and the fair housing complaints, the Township has continued its owner-occupied housing rehabilitation program. From 2015 to 2020, the Township has planned to assist 10 low- and moderate-income households annually in this way. For Parsippany's special-needs population, the Township has focused on supporting service providers, community facilities, and improving accessibility throughout the Township through infrastructure improvements. To increase transportation options available to low- and moderate-income seniors and disabled persons, the Township has budgeted for the purchase of a vehicle. It is estimated that these vans will serve approximately 600 individuals per year.

Chapter 5: Private Sector Policies

Mortgage Lending Analysis

Homeownership can provide critical economic benefits for households and social benefits for the greater community. High rates of owner occupancy create stable communities by reducing the level of transience in the housing market. Unfettered access to affordable housing choice requires fair and equal access to the mortgage lending market regardless of income. It is also important from a fair housing perspective, because the Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans.

An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. It can also identify geographic clusters of high-cost lending. Home Mortgage Disclosure Act (HMDA) data is comprised of records for all residential loan activity reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The most recent HMDA data available for Morris County is for 2014. The data included for this analysis is for three years, 2012 through 2014, and constitutes all types of applications received by lenders: home purchase, refinancing, or home improvement mortgage applications for one-to-four-family dwellings and manufactured housing units across the entire County. The demographic and income information provided pertains to the primary applicant only. Co-applicants were not included in the analysis. The following figures summarize three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis.

Cumulative Mortgage Data Summary Report										
	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	24,978	29.2%	13,978	56.0%	1,023	4.1%	2,193	8.8%	3,119	12.5%
Home Improvement	3,450	4.0%	1,764	51.1%	136	3.9%	1,073	31.1%	308	8.9%
Refinancing	57,254	66.8%	30,318	53.0%	1,937	3.4%	8,622	15.1%	7,626	13.3%
Loan Type										
Conventional	74,925	87.4%	41,797	55.8%	2,737	3.7%	10,429	13.9%	9,291	12.4%
FHA	9,204	10.7%	3,588	39.0%	302	3.3%	1,209	13.1%	1,486	16.1%
VA	1,344	1.6%	600	44.6%	52	3.9%	222	16.5%	249	18.5%
FSA/RHS	209	0.2%	75	35.9%	5	2.4%	28	13.4%	27	12.9%
Property Type										
One to four-family unit	85,538	99.8%	45,967	53.7%	3,083	3.6%	11,864	13.9%	11,046	12.9%
Manufactured housing unit	34	0.0%	12	35.3%	5	14.7%	14	41.2%	1	2.9%
Applicant Race										
Native American	173	0.2%	80	46.2%	6	3.5%	48	27.7%	31	17.9%
Asian	7,096	8.3%	4,163	58.7%	309	4.4%	1,029	14.5%	977	13.8%
Black	1,113	1.3%	535	48.1%	56	5.0%	268	24.1%	183	16.4%
Hawaiian	186	0.2%	92	49.5%	7	3.8%	50	26.9%	21	11.3%
White	59,674	69.6%	35,771	59.9%	2,282	3.8%	8,695	14.6%	7,686	12.9%
No information	10,011	11.7%	5,223	52.2%	419	4.2%	1,769	17.7%	2,142	21.4%
Not applicable	7,429	8.7%	196	2.6%	17	0.2%	29	0.4%	13	0.2%
Hispanic*	3,897	4.5%	1,992	51.1%	141	3.6%	806	20.7%	594	15.2%
Total	**85,682**	**100.0%**	**46,060**	**53.8%**	**3,096**	**3.6%**	**11,888**	**13.9%**	**11,053**	**12.9%**

Source: Federal Financial Institutions Examination Council

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

* Hispanic ethnicity is counted independently of race.

General Mortgage Lending Patterns

Between 2012 and 2014, lenders in Morris County received 85,682 home purchase mortgage applications. Of these applications, 57,254 were for mortgage refinancing and 3,450 were for home improvement equity loans. Refinancing loans were only slightly less likely to be approved than home purchase loans, with 53% of refinancing loans approved compared to 56% of purchase loans.

A slightly lower proportion (51.1%) of home improvement loans were approved. An additional 4.1% of home purchase loans were approved but not accepted by the applicant, and 8.8% were denied. Refinancing loans were more likely than home purchase loans to be withdrawn by the applicant or incomplete, at 13.3% versus 12.5% for home purchase loans and 8.9% for home improvement loans. Home improvement loans were more likely to be denied than out of any other type of loan, with a denial rate of 31.1%. This may be because of the impact of the recent recession, in which banks were reluctant to finance the addition of equity into a house that was no longer appreciating.

The most commonly sought type of financing was a conventional loan, a category that comprised 87.4% of all loan applications. However, a large proportion of applications (10.7%) were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents due to less stringent down payment and credit history requirements. A small number of loan applications were backed by the Farm Services Administration or Rural Housing Service (FSA/RHS). There were also a small but significant number of VA loans taken out in Morris County. The

popularity of VA loans may be an indicator of the impact of the recent recession, in which VA loans became much more preferable and/or attainable compared to conventional mortgages due to a lower down payment requirement. There may also be active and effective veterans' marketing and support networks in the area that are able to connect candidates with these types of loans. Almost all (99.8%) of the 85,682 applications in Morris County involved one-to-four family housing structures, with only 34 applications requesting financing for manufactured units.

Loan Application Type by Race/Ethnicity

	Total	White	Black	Asian**	Other**	No data	Hispanic*
Home purchase	24,978	17,228	369	2,523	90	4,768	1,527
	29.2%	28.9%	33.2%	35.6%	25.1%	27.3%	39.2%
Home improvement	3,450	2,561	53	181	34	621	216
	4.0%	4.3%	4.8%	2.6%	9.5%	3.6%	5.5%
Refinance	57,254	39,885	691	4,392	235	12,051	2,154
	66.8%	66.8%	62.1%	61.9%	65.5%	69.1%	55.3%
Total	85,682	59,674	1,113	7,096	359	17,440	3,897
	100.0%	69.6%	1.3%	8.3%	0.4%	20.4%	4.5%

Source: Federal Financial Institutions Examination Council

Note: Percentages within racial/ethnic groups are calculated within each group's total.
* Hispanic ethnicity is counted independently of race.
**Small sample size may make analysis unreliable.

The racial and ethnic composition of loan applicants differs somewhat from the region's general demographic distribution. While 3.2% of all Morris County households in 2014 were Black, only 1.3% of the loan applications for which racial/ethnic data was reported were Black. The denial rate for Black applicants was 24.1%, which is significantly higher than the average of 14.6% for White applicants and the County's average denial rate of 13.9%. While 12.1% of the households in Morris County were Hispanic or Latino ethnicity, only 4.5% of applications were submitted by Hispanic or Latino applicants and the denial rate of 20.7% was also higher than the countywide average. Native American applicants had the highest denial rate in the County, while Asians had the lowest. Asians were also slightly under-represented in the mortgage application data, submitting 8.3% of the applications while comprising 9.4% of the population.

Loan application types differed across racial and ethnic groups as well. Refinancing was the predominant application purpose across all racial and ethnic groups. However, Whites were the most likely to refinance, and Hispanics were the least likely to refinance. Higher shares of Asian and Hispanic households applied for home purchase loans compared to the general applicant pool. This is consistent with feedback from stakeholders interviewed, which indicated that Morris County has several ethnic enclaves with stable homeowner populations.

Between 2012 and 2014, a total of 11,888 mortgage loan applications were denied in Morris County. The overall cumulative denial rate was 13.9% with denials by race and ethnicity ranging from 14.5% for Whites to 27.7% for Native Americans. The reason the cumulative denial rate is lower than the lowest category by race is the presence of records with no information on race available.

In reporting denials, lenders are required to list at least one primary reason for the denial and may list up to two secondary reasons. As the following figure demonstrates, the most popular primary basis for rejection was a poor debt-to-income ratio, accounting for 21.6% of all denials. The second most common denial category was insufficient collateral. A large portion of denials were assigned "No Reason Given" as a reason. The "No Reason Given" category represents applications that were denied, but information as to why the application was denied was not reported. This could either be an issue with the HMDA dataset or lenders not actually providing a reason for denial as required by law.

Denial reasons vary by race. Black applicants were more likely to be denied due to poor credit history and employment history. Hispanic applicants were more likely to be affected by a poor debt-to-income ratio, poor credit history, and insufficient cash.

Primary Reason for Application Denial by Race/Ethnicity

	Total	White	Black	Asian	Other	No Info	Hispanic*
Collateral	20.6%	21.1%	14.2%	22.2%	18.4%	18.4%	17.7%
Incomplete Application	14.8%	14.7%	13.1%	17.5%	4.1%	15.0%	11.5%
Debt/Income Ratio	21.6%	21.3%	17.2%	25.5%	27.6%	21.6%	23.1%
Other	7.7%	7.9%	9.3%	6.9%	12.2%	6.9%	8.4%
No Reason Given	15.4%	15.3%	13.8%	11.4%	13.3%	17.9%	15.3%
Credit History	12.9%	12.7%	25.7%	7.5%	19.4%	14.8%	16.4%
Unverifiable Information	3.5%	3.4%	3.4%	5.4%	4.1%	2.8%	3.5%
Insufficient Cash	2.1%	2.2%	1.5%	2.5%	1.0%	1.4%	2.7%
Employment History	1.2%	1.3%	1.5%	1.1%	0.0%	0.7%	1.1%
Insurance Denied	0.1%	0.1%	0.4%	0.1%	0.0%	0.1%	0.2%

Source: Federal Financial Institutions Examination Council

* Hispanic ethnicity is counted independently of race

Annual Trends in Mortgage Lending

	2012		2013		2014	
	#	%	#	%	#	%
Total loans						
Applications	**37,837**	**100.0%**	**30,728**	**100.0%**	**17,117**	**100.0%**
White	26,694	70.5%	21,371	69.5%	11,609	67.8%
Black	435	1.1%	418	1.4%	260	1.5%
Asian	3,074	8.1%	2,573	8.4%	1,449	8.5%
Other race	157	0.4%	137	0.4%	65	0.4%
No information/NA	7,477	19.8%	6,229	20.3%	3,734	21.8%
Hispanic*	1,527	4.0%	1,396	4.5%	974	5.7%
Originated	**20,602**	**54.4%**	**16,479**	**53.6%**	**8,979**	**52.5%**
White	16,078	60.2%	12,781	59.8%	6,912	59.5%
Black	213	49.0%	197	47.1%	125	48.1%
Asian	1,829	59.5%	1,478	57.4%	856	59.1%
Other race	73	46.5%	64	46.7%	35	53.8%
No information/NA	2,409	32.2%	1,959	31.4%	1,051	28.1%
Hispanic*	790	51.7%	727	52.1%	475	48.8%
Originated - High Cost	**131**	**0.6%**	**197**	**1.2%**	**316**	**3.5%**
White	113	0.7%	172	1.3%	263	3.8%
Black	5	2.3%	1	0.5%	15	12.0%
Asian	4	0.2%	8	0.5%	7	0.8%
Other race	-	0.0%	2	3.1%	1	2.9%
No information/NA	9	0.4%	14	0.7%	30	2.9%
Hispanic*	7	0.9%	28	3.9%	51	10.7%
Denied	**5,090**	**13.5%**	**4,182**	**13.6%**	**2,616**	**15.3%**
White	3,759	14.1%	3,037	14.2%	1,899	16.4%
Black	93	21.4%	106	25.4%	69	26.5%
Asian	416	13.5%	385	15.0%	228	15.7%
Other race	14	8.9%	22	16.1%	12	18.5%
No information/NA	772	10.3%	604	9.7%	392	10.5%
Hispanic*	321	21.0%	262	18.8%	223	22.9%

Source: Federal Financial Institutions Examination Council

Note: Percentages in the Originated - High Cost category are claculated based on the number of Originated loans only. Percentages in the Originated and Denied categories are calculated from the Total Application figures.

* Hispanic ethnicity is counted independently of race.

During the three-year study period, origination and denial rates remained relatively constant, with a slight increase in 2014, while high-cost loans continually increased. Denial rates ranged from a low of 13.5% in 2012 to a high of 15.3% in 2015. This is counter to the national trend following the subprime mortgage crisis, in which banks strictly tightened access to credit and are cautiously relaxing lending practices gradually. Reasons as to why high-cost loans are increasing in Morris County may require additional research.

For this analysis, lower-income households include those with incomes between 0% and 80% of median family income (MFI), while upper-income households include those with incomes above 80% MFI. Applications made by lower-income households accounted for 23.1% of all denials between 2012 and 2014, although they accounted for only 16.6% of total applications for those three years. Denial rates were higher for lower-income households and for minorities, and highest overall for lower-income minorities. While the overall lower-income denial rate was 13.9%, the denial rates for lower-income

Black and Hispanic households were 39.1% and 26.8%, respectively. Denial rates were generally lower for upper-income households, although differences in the denial rate persisted across racial and ethnic groups. The overall upper-income denial rate for upper-income White applicants was 10.2%, compared to a denial rate of 14.8% for upper-income Blacks and 11.5% for upper-income Hispanics.

Application Denials by Household Race/Ethnicity

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Applications	14,275	10,889	266	814	93	1,668	1,233
	Denials	3,304	2,473	104	212	39	476	331
	% Denied	**23.1%**	**22.7%**	**39.1%**	**26.0%**	**41.9%**	**28.5%**	**26.8%**
Upper-Income	Total Applications	77,691	57,115	1,032	6,864	339	9,357	3,635
	Denials	7,950	5,825	153	782	52	1,138	418
	% Denied	**10.2%**	**10.2%**	**14.8%**	**11.4%**	**15.3%**	**12.2%**	**11.5%**
Total	Total Applications	85,682	59,674	1,113	7,096	359	17,440	3,897
	Denials	11,888	8,695	268	1,029	98	1,798	806
	% Denied	**13.9%**	**14.6%**	**24.1%**	**14.5%**	**27.3%**	**10.3%**	**20.7%**

Source: Federal Financial Institutions Examination Council

Note: Total also includes 28,875 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.
**Small sample size may make analysis unreliable.

Loan Originations by Household Race/Ethnicity

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Originations	6,859	5,635	97	424	32	670	567
	High-Cost	168	152	6	4	2	4	40
	% High-Cost	**2.4%**	**2.7%**	**6.2%**	**0.9%**	**6.3%**	**0.6%**	**7.1%**
Upper-Income	Total Originations	44,153	34,441	498	4,052	166	4,992	1,878
	High-Cost	403	332	14	15	1	41	42
	% High-Cost	**0.9%**	**1.0%**	**2.8%**	**0.4%**	**0.6%**	**0.8%**	**2.2%**
Total	Total Originations	46,060	35,771	535	4,163	172	5,419	1,992
	High-Cost	644	548	21	19	3	53	86
	% High-Cost	**1.4%**	**1.5%**	**3.9%**	**0.5%**	**1.7%**	**1.0%**	**4.3%**

Source: Federal Financial Institutions Examination Council

Note: Total also includes 6,892 originated loans for which no income data was reported.

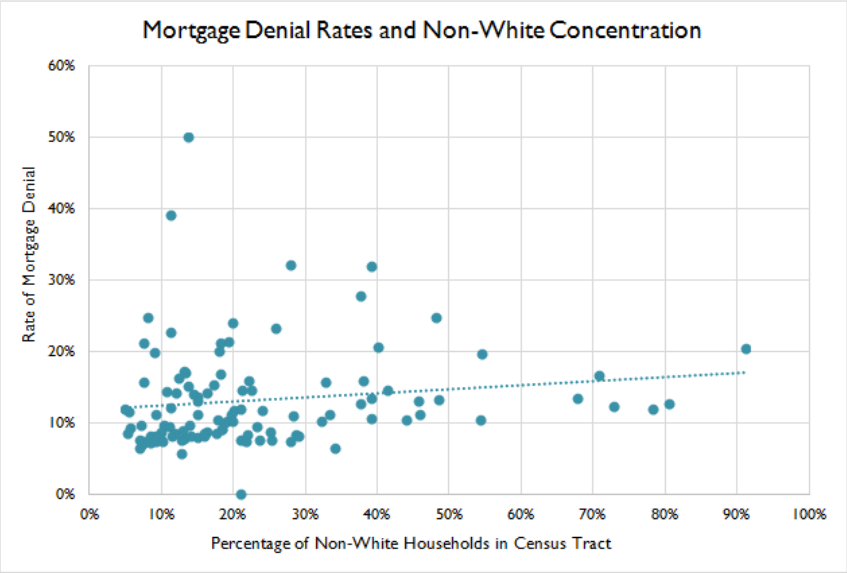
* Hispanic ethnicity is counted independently of race.
**Small sample size may make analysis unreliable.

Geography of Mortgage Denial

There was slight geographic variation in the origination and denial rates by census tract. The highest denial rate was 20.6% (tract 435, in Morristown) and the lowest was 6.4% (tract 417.03, in Parsippany).

There was a slight correlation between the percentage of non-Whites in a census tract and the denial rate of mortgage applications. As the proportion of minorities living in a given census tract increased, the mortgage denial rate increased as well. The correlation coefficient of 0.144 indicates weak positive correlation and is likely not statistically significant. This indicates that minority concentration does not

have a strong impact on mortgage denial in Morris County, although the two variables are positively correlated.



High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair. Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers.

The practice of targeting minorities for subprime lending qualifies as mortgage discrimination. Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.” A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing US Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency. Between 2012 and 2014, there were 85,682 home purchases, refinance, or home improvement loans made for single-family or manufactured units in Morris County. Of these loans, 644 resulted in high-cost loans.

Overall, upper-income households were less likely to have high-cost mortgages than lower-income households. Analyzing loans in Morris County by race and ethnicity reveals that high-cost lending is more common among minority applicants, particularly Black and Hispanic applicants. These racial and ethnic minority groups were both more than twice as likely to receive a high-cost loan compared to Whites in Morris County. Among lower-income minority households, 4.3% of loans to Hispanics were high-cost and 3.9% of loans for Black households were high-cost. Low-income Blacks were most likely to receive a high-cost loan, at a rate of 6.2%. These are significantly higher than the rate of 2.4% for lower-income White households, as well as the overall average of 1.4%. Rates of high-cost lending were lower in upper-income households compared to lower-income households for all races. However, the low sample size in some of these categories—specifically among the other race category—decreases the statistical significance of these findings for this group.

Top Lending Institutions

The following table shows the top ten lending institutions in Morris County. These ten institutions reviewed 48.9% of all loan applications and were responsible for 46.1% of all originations within the county. Wells Fargo Bank was by far the largest lending institution, accounting for 18% of all originations.

Lending Institution	# of Applications	% of Total Applications	# of Loans Originated	% of Total Originations
Wells Fargo	17,860	18.0%	8,611	16.2%
JP Morgan	8,152	8.2%	4,121	7.8%
Bank of America	4,662	4.7%	2,411	4.5%
Valley National Bank	3,980	4.0%	2,614	4.9%
Quicken Loans	3,000	3.0%	2,299	4.3%
Citibank	2,708	2.7%	1,167	2.2%
Citimortgage	2,152	2.2%	223	0.4%
Weichert Financial Services	2,068	2.1%	1,337	2.5%
TD Bank	2,026	2.0%	997	1.9%
Ally Bank	1,832	1.8%	688	1.3%
Subtotal	**48,440**	**48.9%**	**24,468**	**46.1%**

Source: Federal Financial Institutions Examination Council

Chapter 6: Impediments to Fair Housing Choice and Fair Housing Action Plan

The following impediments were identified as factors that contribute to housing discrimination and/or constrained housing choice for members of the protected classes in Morris County and Parsippany. Each impediment is followed by a long-term goal, with specific action steps that can be taken listed beneath this.

Impediments that affect the entire County are listed in the General category, and affect both Morris County and Parsippany. However, action steps are specific to either Morris County or Parsippany. Impediments specific to Parsippany are discussed in their own section.

General

Impediment: A lack of affordable housing throughout Morris County disproportionately affects members of the protected classes.

Goal: Make affordable housing development in Morris County and Parsippany a priority over the next five years.

Priority Action: Continue to utilize, monitor, and enforce COAH-approved Fair Share Plans to ensure affordable housing units are built.

Priority Action: Provide technical assistance for developers interested in using federal or state funds for affordable housing development.

Priority Action: Morris County and its townships, including Parsippany, should continue to monitor the database of expiring affordable housing units over the next five years. Assess if and when any units could be lost due to expiring contracts, and what actions the County can take to preserve these units.

Priority Action: Encourage housing providers to develop programs that involve rehabilitation, mixed use, or redevelopment with the explicit goal of increasing local affordable housing inventory.

Impediment: Racially concentrated areas of poverty are found in several census tracts in Morris County. These areas may be indicative of constrained housing choice for members of the protected classes.

Goal: Improve overall living conditions in racially concentrated areas of poverty while expanding affordable housing options in higher opportunity areas.

Priority Action: Continue to allocate CDBG funding for public facilities and infrastructure improvements in RCAP areas, with the explicit intention of improving overall living conditions for RCAP residents.

Priority Action: Continue and expand existing housing rehabilitation programs.

Priority Action: Provide pre-development funding to non-profit developers operating in higher opportunity neighborhoods, in order to help underwrite high upfront affordable housing development costs

Impediment: Members of the protected classes are more likely to have lower incomes, higher unemployment rates, and higher poverty rates. This limits housing choice, restricting access to community assets for members of the protected classes.

Goal: Remove barriers to access of community assets for members of the protected classes.

Priority Action: If proposed market-rate housing developments require negotiation with a governing body, ensure new developments will not discriminate based upon source of income (i.e. Section 8 vouchers).

Priority Action: In future transportation route development, prioritize linking job centers in targeted rapid-growth economic sectors (see Appendix A) with RCAPs.

Impediment: Morris County and Parsippany's public transportation systems are fragmented, and could more adequately provide access to jobs and services for members of the protected classes.

Goal: Improve public transportation access for members of the protected classes.

Priority Action: Plan transportation routes and economic development initiatives in tandem. Prioritize linking job centers and targeted rapid-growth economic sectors (see Appendix A) with areas containing concentrations of affordable housing.

Priority Action: Consider prioritizing transit coverage area over ridership to improve transit access for persons with mobility limitations. This will extend access for more-lower income individuals seeking employment opportunities outside of their neighborhoods.

Priority Action: Both Morris County and Parsippany should translate transportation website information and printed material into Spanish. Parsippany should translate their transportation information into Gujarati and Chinese as well.

Priority Action: Work with social service agencies, organizations that serve national origin groups and minorities, and homeless and disability advocacy groups to ensure these groups have access to transportation.

Priority Action: Conduct periodic monitoring to ensure that the several senior housing complexes throughout Morris County and Parsippany have adequate "access-a-ride" funding and services in the future.

Priority Action: Take action to preserve affordability in areas that will be planned for transit-oriented development, as housing costs may increase in response to new transit routes.

Priority Action: Establish a formal policy of locating public service facilities for City and County agencies on bus lines whenever possible. Actively encourage non-profits serving transit-dependent clientele to do the same.

Impediment: Members of the protected classes are disproportionately denied mortgages in the private sector.

Goal: Increase the competitiveness of mortgage applications among members of the protected classes.

Priority Action: Address the difficulties of low-income persons finding loans in the private market by utilizing CDBG funds for first time homebuyer programs to benefit low and moderate income persons.

Morris County

Impediment: Morris County's monitoring and evaluation procedures do not properly track fair housing expenditures. Other policy components related to fair housing require revision.

Goal: Improve monitoring and evaluation in order to guarantee compliance and account for fair housing expenditures.

Priority Action: Continue the process of updating site and neighborhood standards for the HOME program according to the most recent regulation updates. Ensure this policy for HOME includes an obligation to affirmatively furthering fair housing

Priority Action: Ensure all PHAs either immediately develop or enforce an affirmative marketing plan.

Priority Action: Formally add subrecipient obligations to affirmatively further fair housing into existing monitoring and evaluation protocols.

Priority Action: Systematically track the addresses of CDBG and HOME investments in a manner that makes it easy to query, such as a spreadsheet. Monitor the geographic distribution of investments to ensure HUD funds affirmatively further fair housing, expand access to opportunity, and fulfill national objectives.

Priority Action: Ensure that the Fair Housing logo is posted in the offices of its subrecipients. Also ensure that the Fair Housing logo is clearly visible on all materials provided to applicants.

Impediment: Fair housing education and outreach efforts may not satisfy need.

Goal: Increase education and outreach within all of Morris County.

Priority Action: Target education and outreach, especially to landlords renting a small number of units, who may be unaware of fair housing laws and their legal responsibilities.

Priority Action: Work with the State to conduct paired real estate testing in the local rental market. As disability and race generated the most complaints, emphasize these protected classes in the testing. Publish the results in local newspapers as a means of public education and deterrence against future discrimination by landlords.

Priority Action: Target fair housing education and outreach to Morris County's growing Hispanic and Asian populations, of whom significant numbers have limited English proficiency.

Priority Action: Many fair housing documents and CPD programs are hosted on Scribd, a third-party site that requires an account, email address, and account verification. In order to promote easier access to these documents, Morris County should host vital documents on its own website and servers rather than through Scribd or any other third-party site.

Priority Action: Work with the organizations in Morris County that refer fair housing complaints to ensure they contain information on fair housing, and the fair housing complaint process, on their

websites. This includes Neighborhood Legal Services and other non-profit agencies, when applicable. Provide information, literature, and technical assistance, if necessary.

Priority Action: Coordinate with the Fair Housing Council of Northern New Jersey, which was recently awarded a multi-year fair housing enforcement initiative.

Impediment: Morris County's subrecipients may not be aware of their obligation to affirmatively further fair housing. Subrecipients' zoning ordinances and/or attitudes towards affordable housing development may be restricting housing choice for members of the protected classes in higher opportunity areas of the County.

Goal: Increase local awareness of fair housing and ensure subrecipient actions are consistent with fair housing laws.

Priority Action: Monitor and evaluate the zoning ordinances and housing development priorities of local governments applying for federal funds from the County to ensure they are meeting their legal obligation to affirmatively further fair housing in a manner consistent with Morris County's fair housing objectives and HUD's certification to affirmatively further fair housing.

Priority Action: Educate elected officials and department staff in townships responsible for CDBG funds in Morris County's subrecipient communities on their legal obligation to affirmatively further fair housing. Provide education and outreach on zoning, NIMBYism, the importance of affordable housing in all communities and neighborhoods, and other obstacles to fair housing choice

Priority Action: Address local NIMBYism and potential zoning and land use decisions in municipalities by offering technical assistance and workshops on how to incorporate fair housing principles into local zoning ordinances.

Impediment: Morris County's Master Plan is out of date and lacks a detailed plan for affordable housing and accommodating members of the protected classes.

Goal: Ensure the Morris County Master Plan affirmatively furthers fair housing choice.

Priority Action: Update Morris County's Master Plan to include long-term goals and strategy for encouraging or expanding affordable housing development and fostering inclusive communities.

Parsippany

Impediment: Fair housing education and outreach efforts may not satisfy need.
Goal: Increase education and outreach within all of Parsippany.

Priority Action: Work with the Morris County Human Relations Commission to ensure fair housing outreach and education is being provided in Parsippany. In response to Parsippany's growing Asian and Hispanic communities, fair housing rights as they relate to race, ethnicity, and country of origin should be emphasized.

Priority Action: Evaluate the LAP to ensure it presents an effective strategy for communicating with LEP populations in issues of community development programs, housing programs, transportation, and other resources.

Priority Action: Parsippany should work with Morris County through the HOME Consortium in completing an Affirmative Marketing Plan.

Priority Action: Ensure that the Fair Housing logo is posted in relevant offices. Also ensure that the Fair Housing logo is clearly visible on all materials related to Parsippany's housing rehabilitation program, including materials provided to applicants.

Impediment: Parsippany's land use regulations, including its zoning ordinance and comprehensive plan, may inadvertently restrict housing choice for members of the protected classes.
Goal: Ensure local land use decisions do not restrict fair housing choice.

Priority Action: Establish a committee or group involving members of the Township including administration, the town planner, the zoning office, and members of the planning board. This group should identify implicitly discriminatory components in the land use regulations and zoning ordinance. Study how restrictions in the zoning ordinance perpetuate racial and ethnic segregation and housing opportunities outside of racially concentrated areas. Set a time frame for addressing these provisions and eliminating these components.

Priority Action: Revisit the comprehensive plan's policy statement regarding multi-family and townhouse development. Connect the Township's affordable housing needs to its Fair Share requirements to ensure affordable housing is adequately planned for.

Priority Action: Establish a plan of action that includes monitoring and evaluating of fair housing goals in a realistic timeframe. Ensure the plan of action contains measurable outcomes towards fulfilling national objectives.

Impediment: Parsippany does not have up-to-date information on the needs of its non-homeless special needs populations, who are disproportionately members of the protected classes.

Goal: Understand the needs of non-homeless special needs populations in Parsippany, and tailor investments to best fit these needs.

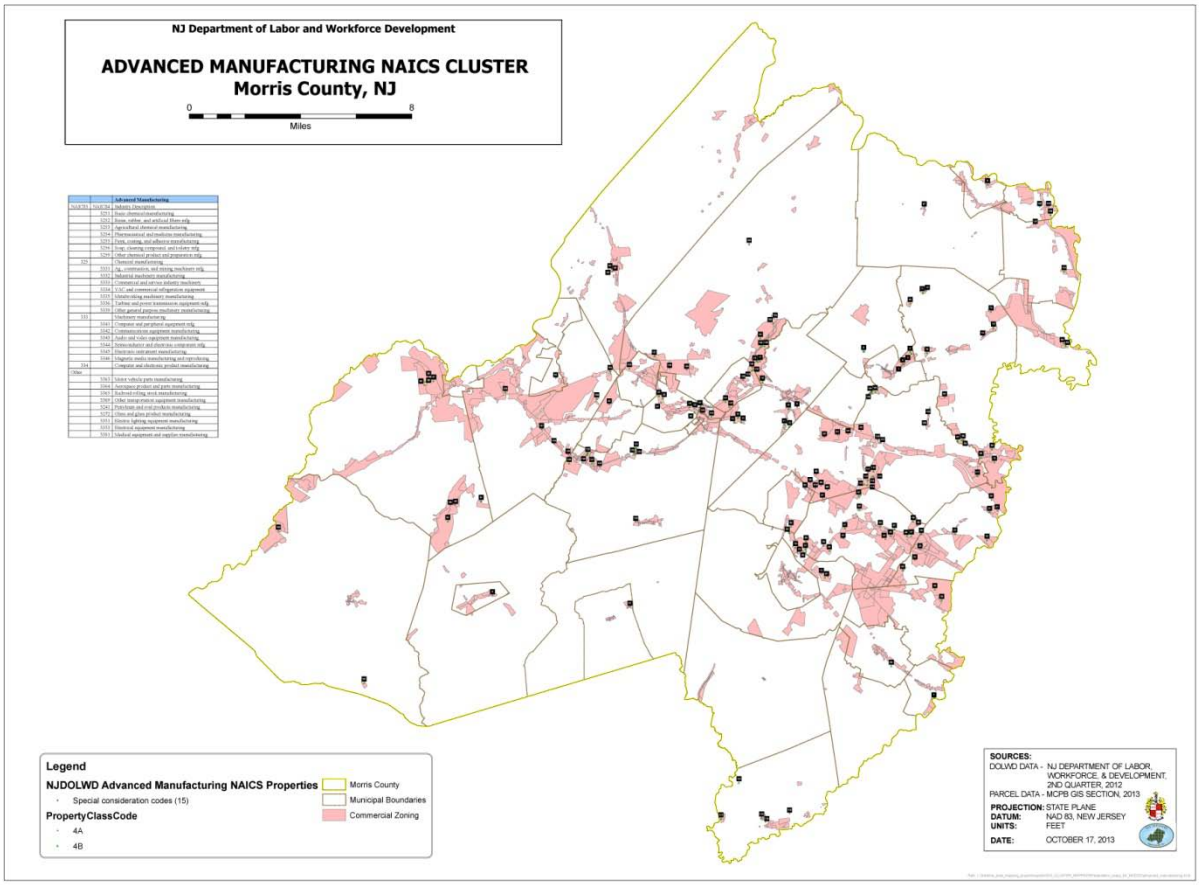
Priority Action: Collaborate with the local Human Services agency on their five-year planning requirements. This collaboration should prioritize Parsippany's non-homeless special needs population. Special needs populations include victims of domestic violence, veterans, persons suffering from mental illness, and other sub-populations.

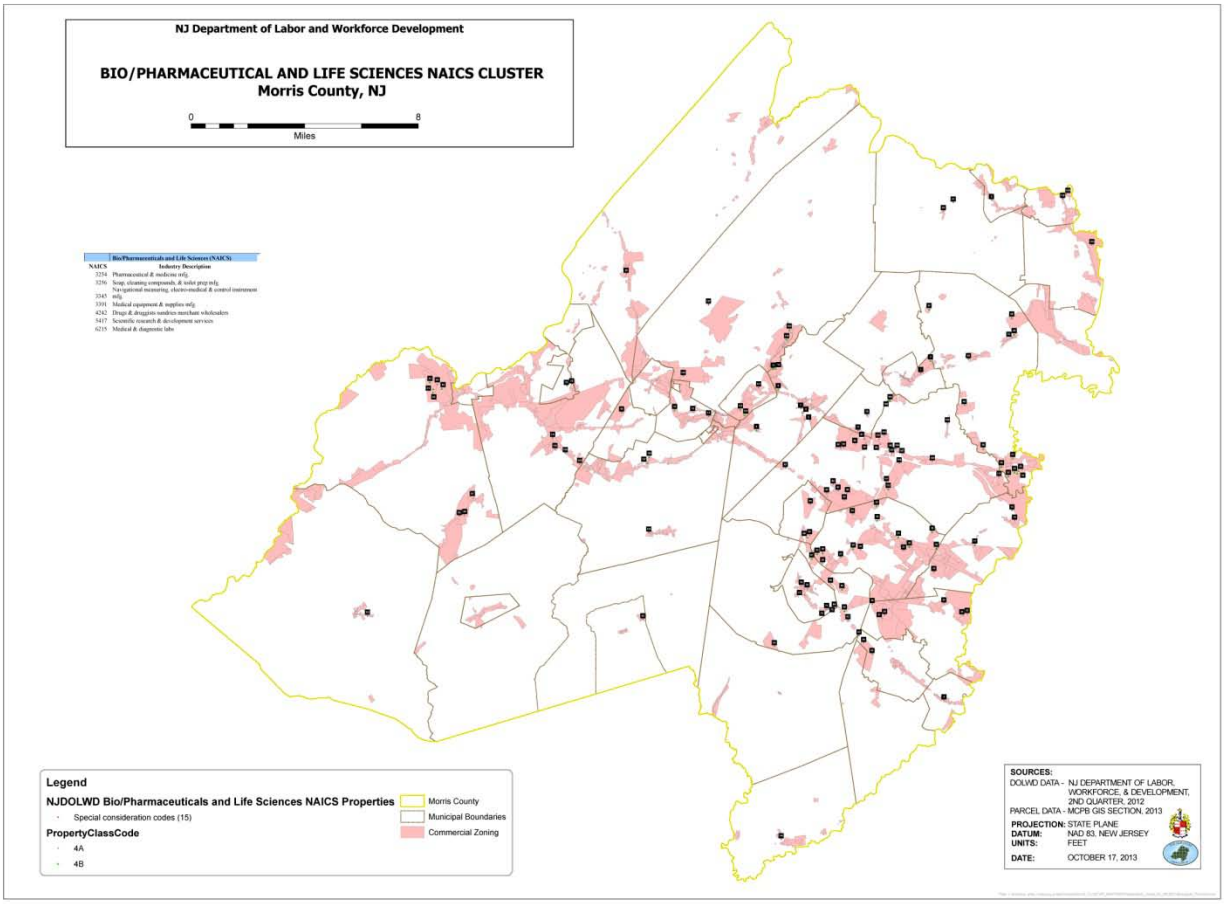
Priority Action: Develop a strategy for addressing the specific needs of Parsippany's non-homeless special needs population.

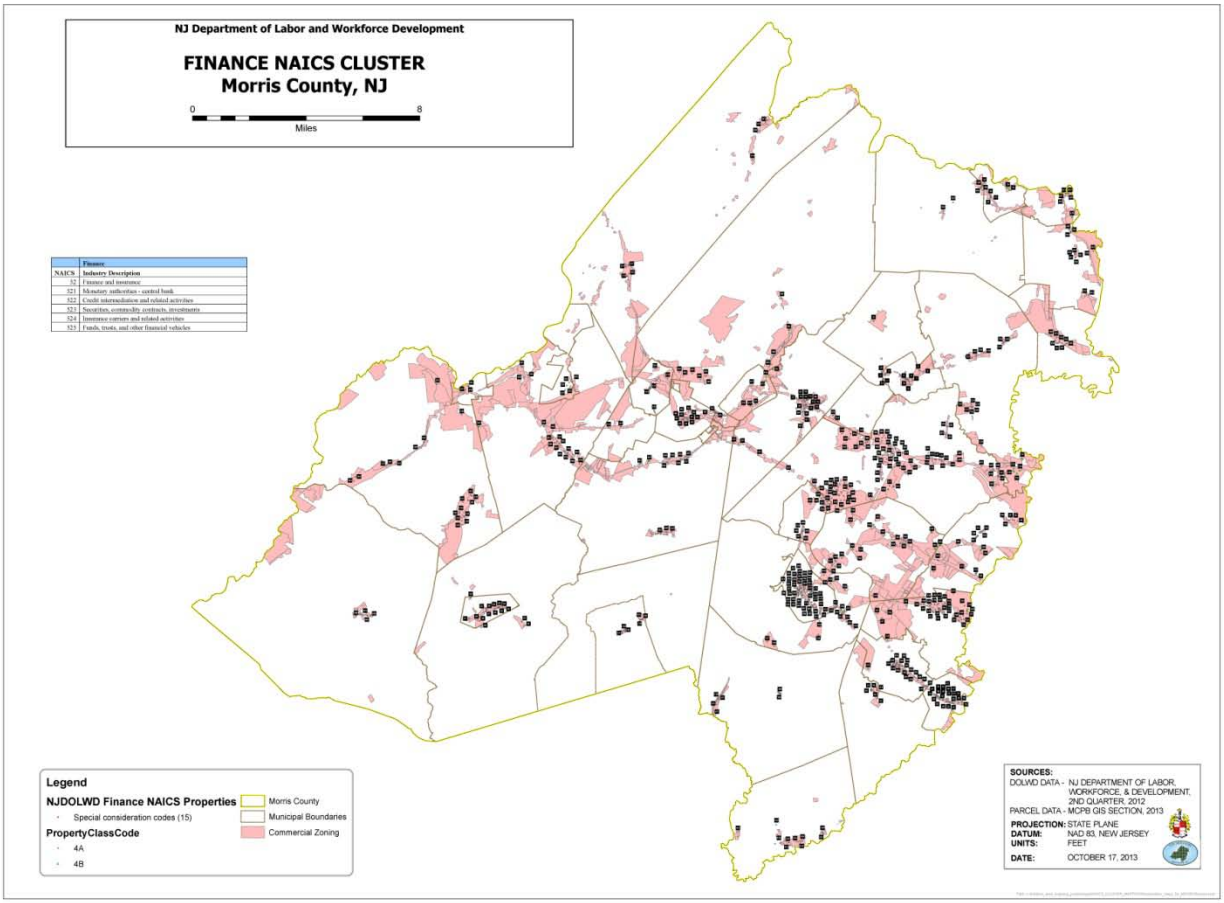
Appendix A: Zoning Analysis Tool

Zoning Ordinance Regulatory Provision: Town of Parsippany-Troy Hills	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Defines family as "One or more persons customarily living together as a single housekeeping unit, whether or not related to each other by birth or marriage". This definition is inclusive, but caps the number of persons living together
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Parsippany has a special cateogry called "community residence for the developmentally disabled". These are permitted by right in any residential district.
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	When the number of persons is between six and 16, the use becomes a conditional use. With fewer than six residents, no conditional use permit is required.
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	Parsippany has a special cateogry called "community residence for the developmentally disabled". These are permitted by right in any residential district.
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	No reasonable accommodation policy. However, construction fees relating to making accessibility accommodations are waived.
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Multi-family housing is permitted in R-5 district
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	2	Land use distinguishes between special "affordable housing districts" and other types of districts. Development in these districts requires submission of an affordability plan, conformance to aesthetic standards, bedroom distribution requirements, and other additional regulations
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	These types of residences are permitted in any district
9. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	2	Smallest minimum lot size is 2 acres in R-1 and R-5 districts
10. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Ordinance states that exterior standards should conform to master plan, but does not include strict exterior standards
TOTAL SCORE	1.40	

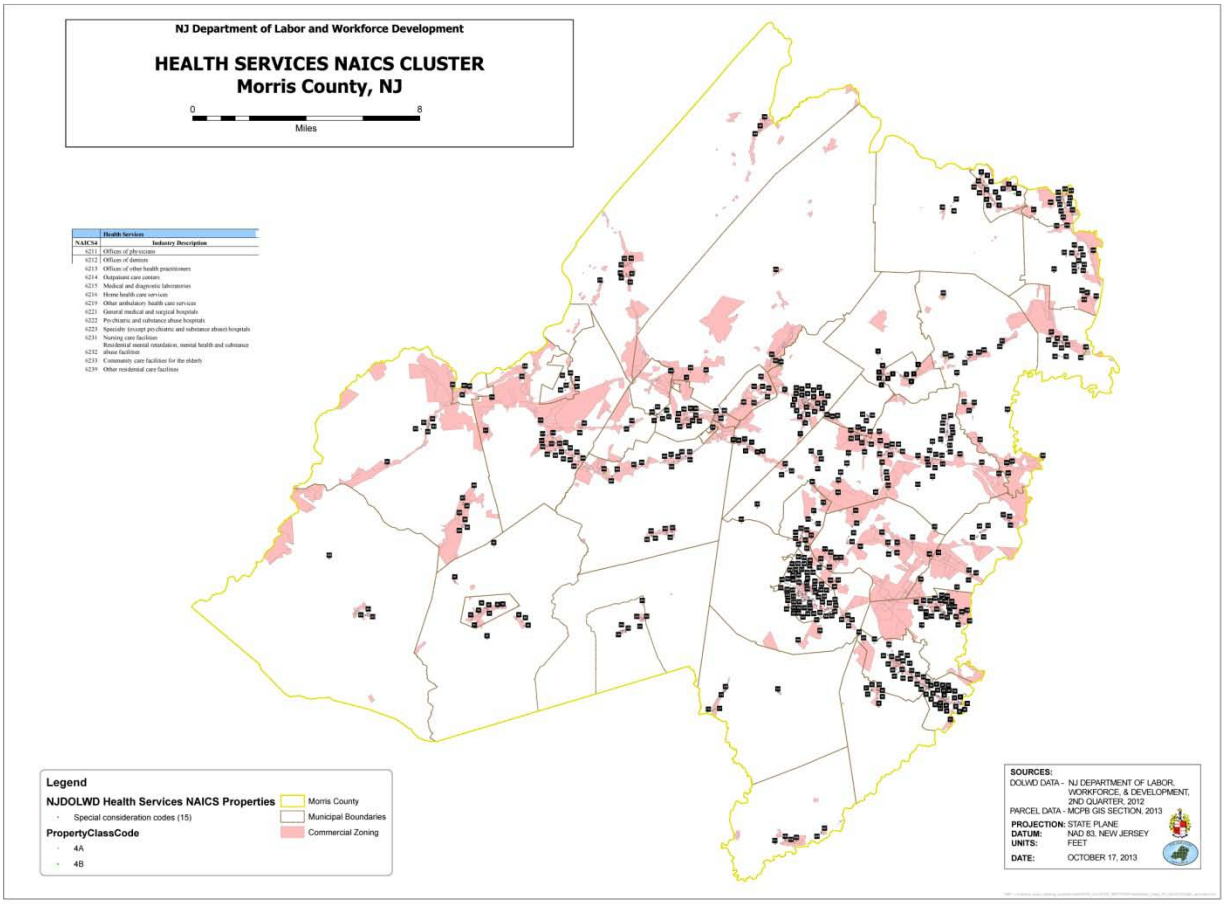
Appendix B: Industrial Cluster Maps

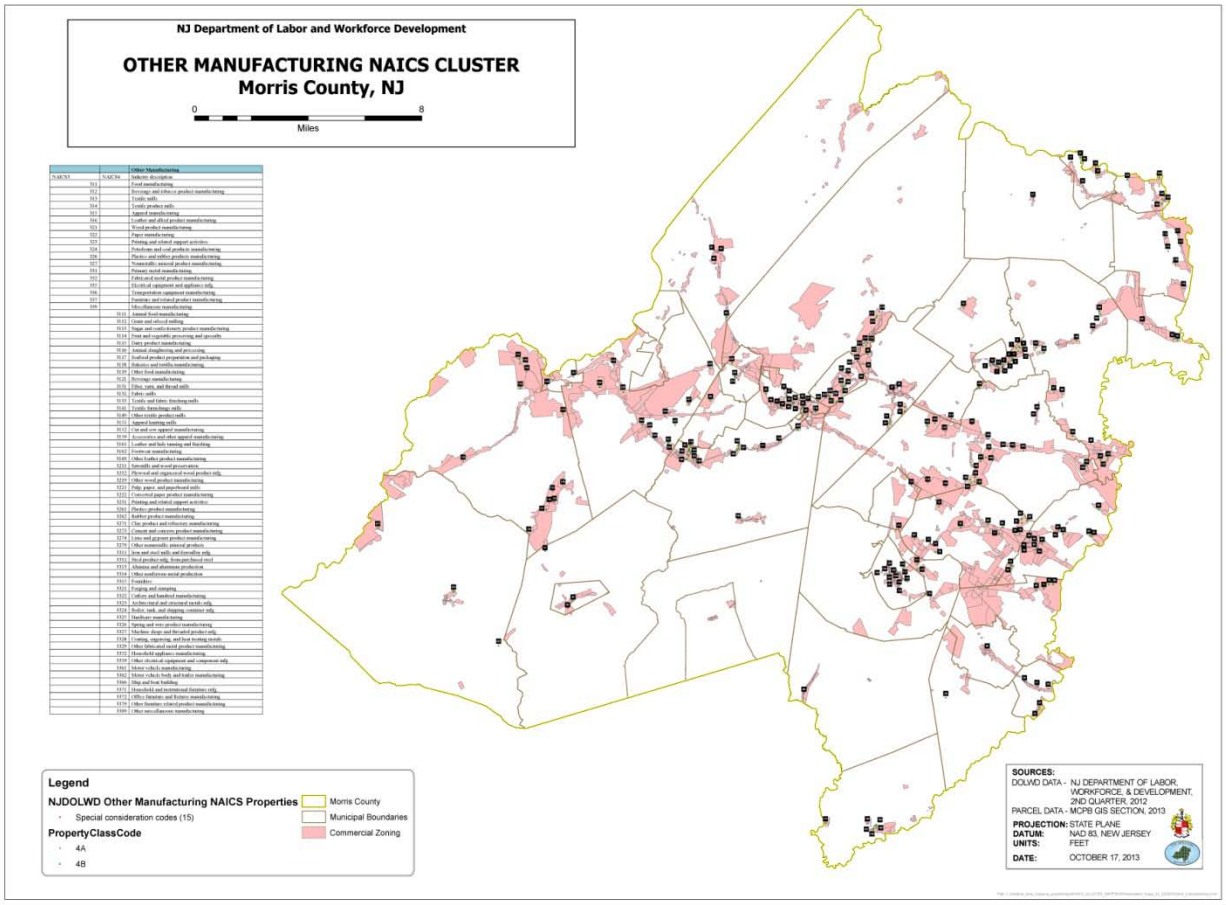



NJ Department of Labor and Workforce Development
BIO/PHARMACEUTICAL AND LIFE SCIENCES NAICS CLUSTER
Morris County, NJ
0
8
Miles
Bio/Pharmaceuticals and Life Sciences (NAICS)
NAICS Industry Description
3254 Pharmaceutical & medicine mfg.
3256 Soap, cleaning compounds, & toilet prep mfg.
3345 Navigational measuring, electro-medical & control instrument mfg.
3391 Medical equipment & supplies mfg.
4242 Drugs & druggists sundries merchant wholesalers
5417 Scientific research & development services
6215 Medical & diagnostic labs
Legend
NJDOLWD Bio/Pharmaceuticals and Life Sciences NAICS Properties
Special consideration codes (15)
PropertyClassCode
4A
4B
Morris County
Municipal Boundaries
Commercial Zoning
SOURCES:
DOLWD DATA - NJ DEPARTMENT OF LABOR, WORKFORCE, & DEVELOPMENT, 2ND QUARTER, 2012
PARCEL DATA - MCPB GIS SECTION, 2013
PROJECTION: STATE PLANE
DATUM: NAD 83, NEW JERSEY
UNITS: FEET
DATE: OCTOBER 17, 2013

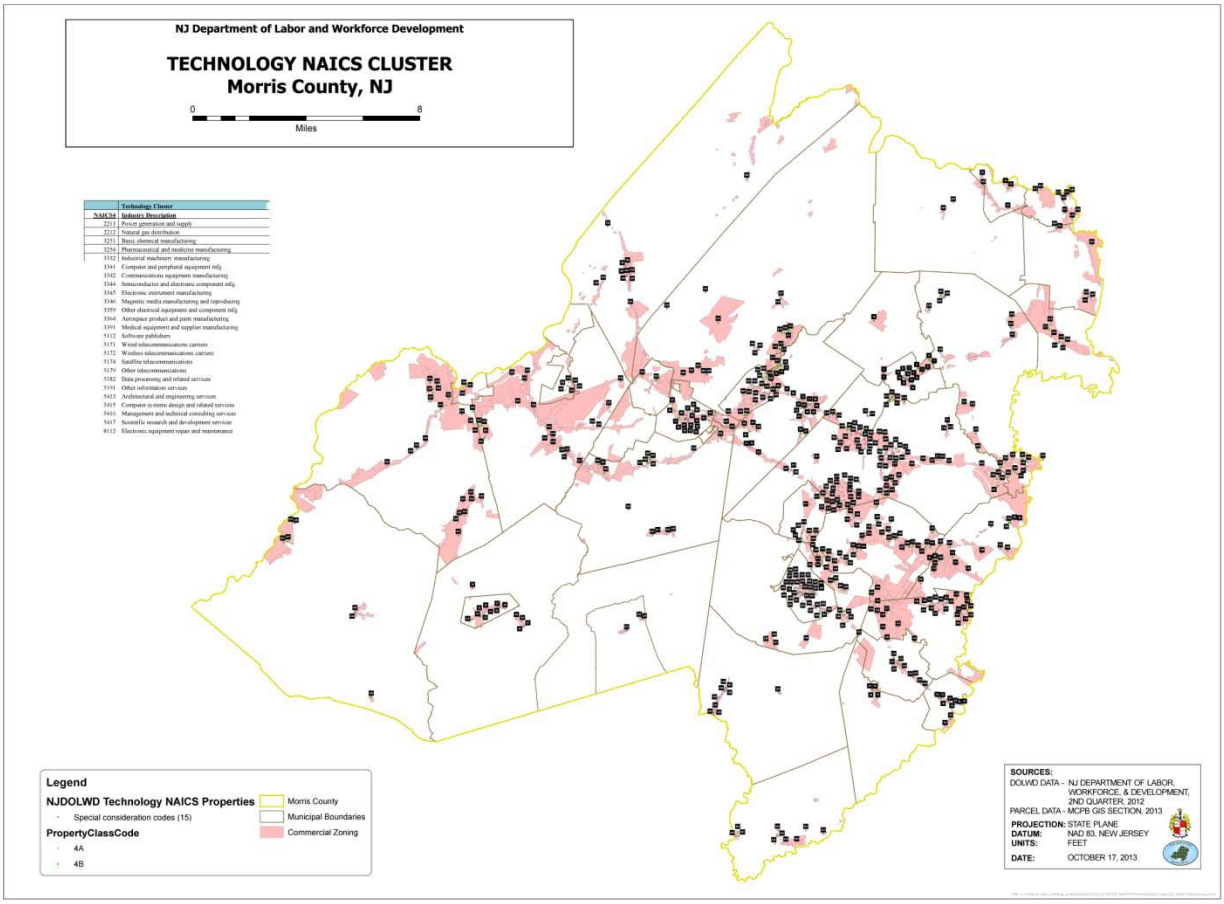


	Finance
NAICS	Industry Description
52	Finance and insurance
521	Monetary authorities - central bank
522	Credit intermediation and related activities
523	Securities, commodity contracts, investments
524	Insurance carriers and related activities
525	Funds, trusts, and other financial vehicles


NJ Department of Labor and Workforce Development
HEALTH SERVICES NAICS CLUSTER
Morris County, NJ
0
8
Miles
Health Services
NAICS4
Industry Description
6211 Offices of physicians
6212 Offices of dentists
6213 Offices of other health practitioners
6214 Outpatient care centers
6215 Medical and diagnostic laboratories
6216 Home health care services
6219 Other ambulatory health care services
6221 General medical and surgical hospitals
6222 Psychiatric and substance abuse hospitals
6223 Specialty (except psychiatric and substance abuse) hospitals
6231 Nursing care facilities
6232 Residential mental retardation, mental health and substance abuse facilities
6233 Community care facilities for the elderly
6239 Other residential care facilities
Legend
NJDOLWD Health Services NAICS Properties
Special consideration codes (15)
PropertyClassCode
4A
4B
Morris County
Municipal Boundaries
Commercial Zoning
SOURCES:
DOLWD DATA - NJ DEPARTMENT OF LABOR, WORKFORCE, & DEVELOPMENT, 2ND QUARTER, 2012
PARCEL DATA - MCPB GIS SECTION, 2013
PROJECTION: STATE PLANE
DATUM: NAD 83, NEW JERSEY
UNITS: FEET
DATE: OCTOBER 17, 2013



		Other Manufacturing
NAICS3	NAICS6	Industry description
311		Food manufacturing
312		Beverage and tobacco product manufacturing
313		Textile mills
314		Textile product mills
315		Apparel manufacturing
316		Leather and allied product manufacturing
321		Wood product manufacturing
322		Paper manufacturing
323		Printing and related support activities
324		Petroleum and coal products manufacturing
326		Plastics and rubber products manufacturing
327		Nonmetallic mineral product manufacturing
331		Primary metal manufacturing
332		Fabricated metal product manufacturing
335		Electrical equipment and appliance mfg.
336		Transportation equipment manufacturing
337		Furniture and related product manufacturing
339		Miscellaneous manufacturing
	3110	Animal food manufacturing
	3112	Grain and oilseed milling
	3113	Sugar and confectionery product manufacturing
	3114	Fruit and vegetable preserving and specialty
	3115	Dairy product manufacturing
	3116	Animal slaughtering and processing
	3117	Seafood product preparation and packaging
	3118	Bakeries and tortilla manufacturing
	3119	Other food manufacturing
	3121	Beverage manufacturing
	3130	Fiber, yarn, and thread mills
	3132	Fabric mills
	3133	Textile and fabric finishing mills
	3141	Textile furnishings mills
	3149	Other textile product mills
	3151	Apparel knitting mills
	3152	Cut and sew apparel manufacturing
	3159	Accessories and other apparel manufacturing
	3161	Leather and hide tanning and finishing
	3162	Footwear manufacturing
	3169	Other leather product manufacturing
	3211	Sawmills and wood preservation
	3212	Plywood and engineered wood product mfg.
	3219	Other wood product manufacturing
	3221	Pulp, paper, and paperboard mills
	3222	Converted paper product manufacturing
	3231	Printing and related support activities
	3261	Plastics product manufacturing
	3262	Rubber product manufacturing
	3271	Clay product and refractory manufacturing
	3273	Cement and concrete product manufacturing
	3274	Lime and gypsum product manufacturing
	3279	Other nonmetallic mineral products
	3311	Iron and steel mills and ferroalloy mfg.
	3312	Steel product mfg. from purchased steel
	3313	Alumina and aluminum production
	3314	Other nonferrous metal production
	3315	Foundries
	3321	Forging and stamping
	3322	Cutlery and handtool manufacturing
	3323	Architectural and structural metals mfg.
	3324	Boiler, tank, and shipping container mfg.
	3325	Hardware manufacturing
	3326	Spring and wire product manufacturing
	3327	Machine shops and threaded product mfg.
	3328	Coating, engraving, and heat treating metals
	3329	Other fabricated metal product manufacturing
	3335	Ghousehold appliance manufacturing
	3359	Other electrical equipment and component mfg.
	3361	Motor vehicle manufacturing
	3362	Motor vehicle body and trailer manufacturing
	3366	Ship and boat building
	3371	Household and institutional furniture mfg.
	3372	Office furniture and fixture manufacturing
	3379	Other furniture related product manufacturing
	3399	Other miscellaneous manufacturing


NJ Department of Labor and Workforce Development
TECHNOLOGY NAICS CLUSTER
Morris County, NJ
0
8
Miles
Technology Cluster
NAICS4 Industry Description
2211 Power generation and supply
2212 Natural gas distribution
3251 Basic chemical manufacturing
3254 Pharmaceutical and medicine manufacturing
3332 Industrial machinery manufacturing
3341 Computer and peripheral equipment mfg.
3342 Communications equipment manufacturing
3344 Semiconductor and electronic component mfg.
3345 Electronic instrument manufacturing
3346 Magnetic media manufacturing and reproducing
3359 Other electrical equipment and component mfg.
3364 Aerospace product and parts manufacturing
3391 Medical equipment and supplies manufacturing
5112 Software publishers
5171 Wired telecommunications carriers
5172 Wireless telecommunications carriers
5174 Satellite telecommunications
5179 Other telecommunications
5182 Data processing and related services
5191 Other information services
5413 Architectural and engineering services
5415 Computer systems design and related services
5416 Management and technical consulting services
5417 Scientific research and development services
8112 Electronic equipment repair and maintenance
Legend
NJDOLWD Technology NAICS Properties
Special consideration codes (15)
PropertyClassCode
4A
4B
Morris County
Municipal Boundaries
Commercial Zoning
SOURCES:
DOLWD DATA - NJ DEPARTMENT OF LABOR, WORKFORCE, & DEVELOPMENT, 2ND QUARTER, 2012
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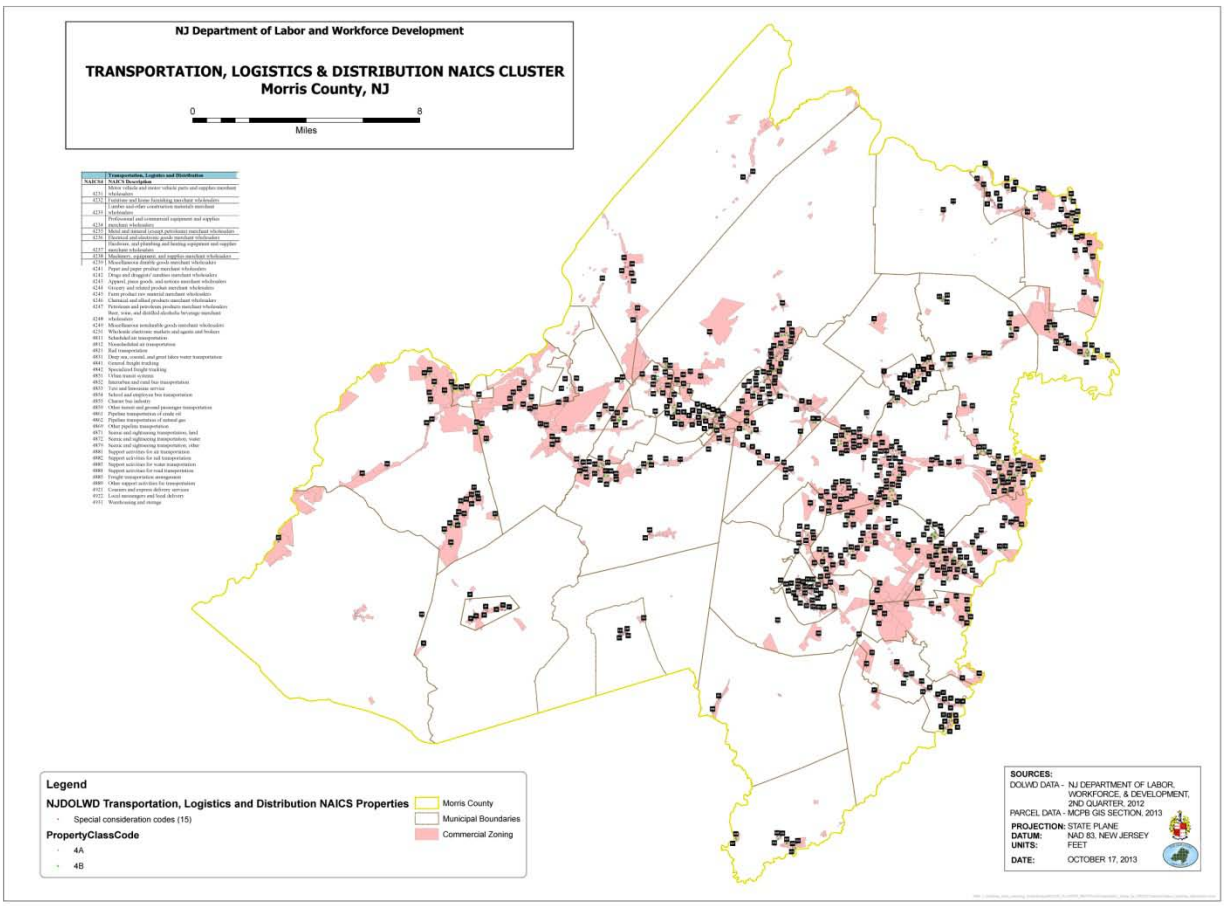
NJ Department of Labor and Workforce Development
TRANSPORTATION, LOGISTICS & DISTRIBUTION NAICS CLUSTER
Morris County, NJ
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Miles
Transportation, Logistics and Distribution
NAICS Code
NAICS Description
4231 Motor vehicle and motor vehicle parts and supplies merchant wholesalers
4232 Furniture and home furnishing merchant wholesalers
4233 Lumber and other construction materials merchant wholesalers
4234 Professional and commercial equipment and supplies merchant wholesalers
4235 Metal and mineral (except petroleum) merchant wholesalers
4236 Electrical and electronic goods merchant wholesalers
4237 Hardware, and plumbing and heating equipment and supplies merchant wholesalers
4238 Machinery, equipment, and supplies merchant wholesalers
4239 Miscellaneous durable goods merchant wholesalers
4241 Paper and paper product merchant wholesalers
4242 Drugs and druggists' sundries merchant wholesalers
4243 Apparel, piece goods, and notions merchant wholesalers
4244 Grocery and related product merchant wholesalers
4245 Farm product raw material merchant wholesalers
4246 Chemical and allied products merchant wholesalers
4247 Petroleum and petroleum products merchant wholesalers
4248 Beer, wine, and distilled alcoholic beverage merchant wholesalers
4249 Miscellaneous nondurable goods merchant wholesalers
4250 Wholesale electronic markets and agents and brokers
4811 Scheduled air transportation
4812 Nonscheduled air transportation
4821 Rail transportation
4831 Deep sea, coastal, and great lakes water transportation
4841 General freight trucking
4842 Specialized freight trucking
4851 Urban transit systems
4852 Interurban and rural bus transportation
4853 Taxicab transportation
4854 School and employee bus transportation
4855 Charter bus industry
4859 Other transit and ground passenger transportation
4861 Pipeline transportation of crude oil
4862 Pipeline transportation of natural gas
4869 Other pipeline transportation
4871 Scenic and sightseeing transportation, land
4872 Scenic and sightseeing transportation, water
4879 Scenic and sightseeing transportation, other
4881 Support activities for air transportation
4882 Support activities for rail transportation
4885 Support activities for water transportation
4888 Support activities for road transportation
4889 Freight transportation arrangement
4890 Other support activities for transportation
4921 Couriers and express delivery services
4922 Local messengers and local delivery
4931 Warehousing and storage
Legend
NJDOLWD Transportation, Logistics and Distribution NAICS Properties
Special consideration codes (15)
PropertyClassCode
4A
4B
Morris County
Municipal Boundaries
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UNITS: FEET
DATE: OCTOBER 17, 2013

Appendix C: Summary of Comments Received

Awaiting public comments.