

CA - Highland Park

6/19/75

interrogatories demanded by the
Plaintiffs of Highland Park

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - MIDDLESEX COUNTY
DOCKET No. C-4122-73

URBAN LEAGUE OF GREATER
NEW BRUNSWICK, et al.

Plaintiffs,

:
: v.

THE MAYOR AND COUNCIL OF
THE BOROUGH OF CARTERET,
et al.

Defendants

Civil Action

INTERROGATORIES

To:

LAWRENCE LERNER, Esq.
Post Office Box 827
New Brunswick, New Jersey 08903

DEMAND is hereby made of the defendant THE MAYOR AND
COUNCIL OF THE BOROUGH OF HIGHLAND PARK for Certified
Answers to the following interrogatories within the time
prescribed by the Rules of this Court.

1. Please provide the most current statistics
available on the population of the municipality, by
income level and race (categorized as white, black,

spanish-speaking, other), citing source.

<u>Total Population</u>	<u>White</u>	<u>Negro</u>	<u>Indian</u>	<u>Other Specified</u>	<u>Other non-specified</u>
14,385	13,462	842	4	58	19

2. Provide for each public school within the municipality, the number of pupils enrolled, with sub-totals for whites, blacks, spanish-speaking and other, giving school name, location, grades served and area.

<u>School</u>	<u>Grades</u>	<u>Location</u>	<u>Total Enrollment</u>	<u>White</u>	<u>Black</u>	<u>Spanish</u>	<u>Oth</u>
Hamilton	K-5	No. 3rd Avenue	264	251	8	1	1Asi
High School	9-12	No. 5th Avenue	786	700	72	10	3Asi 1Ind.
Irving	K 5	So. 11th Avenue	302	225	59	11	7Asi
Lafayette	K-5	Benner St. & 2nd Ave.	312	257	54		1Asi
Middle	6-8	So. 5th Ave.	552	495	50	1	3Asi

3. Provide the number of dwellings presently within the municipality in each of the following value categories, as determined from the property tax rolls.

(a) Single family homes under \$15,000

Forty Four

(b) \$15,000 to \$25,000

Seven hundred twenty four

(c) \$25,000 to \$35,000

Eight hundred eight six

(d) Over \$35,000

Four hundred seventy two

4. Provide the number of multi-family units
 - in each of the following rental categories and ranges.

Type	Rental Range				
	Under \$100	\$100 - \$149	\$150 - \$199	\$200 - \$249	\$250 & Over
Efficiency	0	28	102		0
One-Bedroom	0	0	276		83
Two-Bedroom	0	0	27		375
Three or more Bedrooms	0	0	0		21

5. Provide the total number of mobile homes in municipality that exist as conforming uses under current zoning ordinance.

One Non-conforming use.

6. Provide the number of housing units within the municipality that are below the standards required for new construction or rehabilitation in local building codes and housing standards ordinance. Indicate how many are currently occupied and how many vacant.

65 Owner occupied
 86 renter occupied
 3 owner units vacant
 1 renter unit vacant
 43 beyond rehabilitation

7. Provide for each department in the municipality the number of municipal employees by job category, race, and annual salary or hourly wage.

See attached.

8. Provide the number of county and state

employees working or employed in the municipality by job

category, race, and annual salary or hourly wage.

CETA employees Under Title VI 2 policemen, white \$9,019 per annum.

1 secretary, black, police Dept. \$6,250 per annum.

2 dispatchers, white, Police Dept. \$3.75 per hr.

CETA employees Under Title II 1 custodian, white, Library, \$6,825.00 per annum

1 Librarian Assistant, \$6,825 per annum

9. For each zoning use category (and subcategory,

if necessary, in the municipality) state the total number

of acres contained therein and state how many acres are

vacant. (For example, R-1 residential; 130 acres; 23

vacant). Res. A-468.1 acres of which 140.8 acres is Middlesex County Park land and 19.5 is vacant municipal owned land.

Res. B- 201.7 acres more or less.

Comm. 1 - 32 acres more or less

Comm. 2 - 35.8 acres more or less

SED-1 -4.9 acres more or less

SED-2- 149 acres more or less

Industrial -22.1 acres more or less

General Office. 21.1 acres more or less

10. List the proposals or requests for amendment

to the zoning ordinance to authorize or facilitate

residential construction of the types listed below, from

January 1, 1970 to the present, setting forth the date

of the proposal or request, name of requesting party, and

ultimate disposition. If units were to be subsidized

under state or federal programs, state what program was

involved.

(a) Single-family detached or attached home

construction (involving 10 or more contiguous lots).

None.

(b) Multi-family structures.

None.

(c) Planned unit or other cluster developments.

None.

(d) Mobile home sites.

None.

11. List for the following four categories, the applications for, use variances, special permits or exceptions that have been filed from January 1, 1970 to the present, setting forth the date of initial application, name of the requesting party, and ultimate disposition of application. If units were to be subsidized under state or federal programs, state what program was involved.

(a) Detached or attached single-family home construction (involving 10 or more contiguous lots).

None.

(b) Multi-family structures.

None.

(c) Planned unit or other cluster developments.

None.

(d) Mobile home sites.

None.

12. List the name, address, race and duties of each municipal official, employee, and consultant involved in the municipal zoning and planning process: State the

source of their authority. Planning Board Members all white:

Dr. Roger F. Varney, 9 Redcliffe Ave., Highland Park, N.J. Chairman

Dr. Frank Quaranta, 417 Denison St., Highland Park, N.J. Vice-Chairman

12. (Continued)

Murray Margolis, 144 Amherst St., Highland Park, N.J. Secretary

Roy N. Bertelson, 52 Grant Ave., Highland Park, N.J.

Marcia Ringel, 240 Lincoln Ave., Highland Park, N.J.

James Molnar, 44 Lawrence Ave., Highland Park, N.J.

Mayor G. Paul Beck, 118 So. 5th Avenue, Highland Park, N.J.

Council Man, Joseph J. Lukacs, 12 No. 8th Ave., Highland Park, N.J. Council Representative

Councilman Frank R. Young, 311 No. 4th Ave., Highland Park, N.J. Mayor's Alt. Rep.

George J. Terwilliger, P.O. Box 441, Metuchen, N.J. Borough Engineer and Building Inspector

David Monyek, Esq., attorney, 24 No. 3rd Ave. Highland Park, N.J.

These also are involved in Zoning and Planning process.

Building inspection cited above

Charles Davis, Black, Housing Inspection and Codes Enforcement Officer, 269 So. Tenth Ave., Highland Park, N.J.

Board of Adjustment all white:

Robert Milch, 155 No. 9th Ave., Highland Park, N.J. Chairman

(see attached rider)

13. State whether there are any state or federal subsidized housing units now within or planned for the municipality. If so, list the location, number, size and type of units, project racial occupancy percentages, source of the subsidy and date of initial occupancy.

Present housing units - a 24 unit low rent housing project initiated May, 1959 under FHA auspices. It is located between So. 6th and So. 7th Ave. and consists of the following. Two 4-bedroom units, four 3-bedroom units, six 2-bedroom units, twelve 1-bedroom units. There are three black families totaling 18 blacks and twenty-one white families totaling 42 whites occupying this 24 unit project.

The Borough had planned a 100 unit senior citizens project which has been let out for bids by the Housing Authority.

(a) State whether the municipality ever affirmatively encouraged or assisted in the provision of subsidized housing.

Yes to the best of my knowledge.

(b) State whether any official body of the municipality has ever discussed providing subsidized housing. If so, list the name of the deliberating body, the date and time of the meeting and provide a copy of the minutes or any report resulting from such meetings.

Housing Authority of the Borough of Highland Park does have in fact subsidized housing and the senior citizen project is I believe subsidized housing.

(b) (Continued)

14. State whether there has been any correspondence, contact, or meetings since January 1, 1970 between any municipal officials, employees, or consultants and any county or regional planning body regarding your municipality's housing needs. If so, please attach copies of such correspondence and provide the dates and times of such meetings or contacts indicating whether a written record of such meetings or contacts was ever made.

See attached.

15. State whether the municipality has a rent control ordinance. If so, specify when such an ordinance was first considered and the date of adoption. Attach a copy of the ordinance and the minutes of council meetings at which such an ordinance was considered, and any documented statistics on housing conditions presented at such meetings.

Ordinance introduced Sept. 6, 1972 and adopted October 4, 1972, copy attached.

15. (Continued)

16. State whether at any time from January 1, 1970 to the present there has been in effect a sewer, building permit, or other moratorium relating to housing. If so, state the effective date, who imposed it, and the terms and conditions thereof.

According to building inspector none to his knowledge.

17. State whether as a condition of employment any municipal employee is required to live within the boundaries of the municipality or the county. If so, indicate how long such requirement has been in effect,

its scope and who imposed it. Policemen and hourly employees are not required to live in municipality. Elected and certain appointed officials by state statute must live in community. Other full time employees on an annual salary basis are required to live in community in accordance with personnel manual approved by governing body in 1973.

18. For each commercial, industrial, or other business establishment within the municipality having 15 or more employees, list its name, address, number of employees, and the year it first opened for business.

Borough does not have this information.

19. State whether the municipality has a fair housing or anti-blockbusting ordinance. If so, attach a copy.

Yes, Adopted October 21, 1969, Copy attached.

20. State whether your municipality has ever taken steps to encourage industry to locate in the municipality. If so, please indicate what steps have been taken.

None.

21. Attach a copy of the current zoning ordinance and any and all amendments in force; and a copy of any proposed amendments to the zoning ordinance that are currently pending before the governing body.

Ordinance attached. None pending.

22. Identify the location of the official zoning maps, the coverage, and date of preparation. State whether zoning maps incorporating the most recent amendments are available. If so, state where they can be obtained and the price thereof.

The zoning map covers the entire Borough and is available with ordinances attached at Borough Clerk's office. If picked up in person fee is \$1.00. If mailed, fee is \$1.50.

23. State whether your municipality has proposed and adopted a master plan. If so, please identify a copy indicating the coverage, date of preparation, and number of pages. Also identify by location and content all amendments and background reports prepared in conjunction with such master plan amendment.

Copy of master plan enclosed.

24. State whether the municipality has had prepared or is preparing studies, planning papers, research reports or other similar documents in the areas listed below. Identify each item by author or title, subject, date, number of pages, location of copies and indicate whether a summary is available:

(a) The need for housing within the municipality; None...

(b) The condition and amount of existing

housing stock; Highland Park has requested funds through pending application under Housing and Community Development Act for two additional housing and codes enforcement inspectors to conduct a survey of substandard housing and set guidelines for low cost federal loans for improving same.

(c) The inception of programs relating to

code enforcement; Under the E.E.A. program in November 29, 1971, a full-time Housing and Codes Enforcement Officer was hired. He was retained as a full-time regular Borough employee in this capacity after E.E.A. program funds expired on January, 1974. His name is Charles Davis, black and he has been attending college on a parttime basis since 1972, at municipal expense to improve his knowledge of housing, inspections and related fields.

(d) The requirement for residential densities, floor space, bedroom ratios, and mobile homes within the municipality;

None to our knowledge. Our Housing code space requirements are based on State Housing Code which the Borough adopted October 20, 1971.

(e) The need for providing low and moderate income subsidized or unsubsidized housing within the municipality;

None.

(f) The utilization of land for commercial and residential or industrial purposes; and

None.

(g) The wage and salary scales of employees within the private sector of the municipality.

No.

25. State whether your municipality has ever been studied by, advised by, or received assistance from agencies of federal, state or county government, in preparing studies or other information concerning the areas listed below. Identify each item by author or title, subject, date, number of pages, location of copies, and indicate whether a summary is available.

(a) Need for housing within the municipality and surrounding areas; Board entitled "Comprehensive Master Plan." The Borough also studied by the TriState Transportation Commission

(b) Attitudes toward housing within the municipality and surrounding area;

No.

(c) Housing costs within the municipality and surrounding area;

No.

(d) The amount and percentage of vacant acreage zoned for industrial use.

No.

26. State whether you have ever received any federal or state assistance for any purpose since 1960, setting forth the date and size of the grant, the use to which such funds were put, the location of use, and whether any funds remain to be expended.

No. 1 1-1-71 to 12-31-71 purchase of equipment, establishment of Traffic Safety, purchase of station wagon and vascar unit, office supplies, educational grant and salaries of two policemen and clerk in Traffic Bureau. Total grant \$6,53.

No. 2. 8-1-71 to 7-31-72 Purchase of specialized equipment for local agencies for detection, apprehension, etc., of criminals used in Detective Bureau. Total \$ 2,992.00

No. 3. 10-1-72 to 6-30-74. Purchase of modern communications system. and outdated equipment, base station, mobile units and alarm system. Grant \$15,050.00.

Grant for continuing planning to complete a master plan. Plan adopted in 1969. Master plan attached.

1-8 State grant for expansion of Public Library totaling \$22,932.00 spread over

26. (Continued)

Annual State road aid for repairs and maintenance from Dept. of Transportation.
Annual Street lighting reimbursement for highway lighting from Dept. of Transportation.
E.E.A. Program November 1971 through January 1974 administered through Middlesex
County. Four employees hired listed below and three have been retained by Borough
one left employment.

- 1 black housing inspection-Nov. 1971, started at \$10,000 Became regular employee
in January 1974.
- 1 black maintenanceman- Dec. 1971 to Jan., 1974 started at \$9,500. Left employment
at end of E.E.A. program.
- 1. white clerk in Assessor's office Nov. 1971 started at \$6,000 and continued as regular
employee as of Jan. 1974.
- 1 white clerk in Street Dept. Nov. 1971 started at \$6,000 and became regular employee
in Jan. 1974.

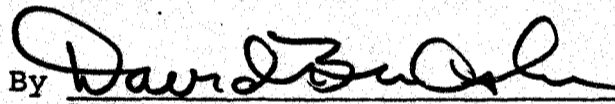
CETA grant administered through Middlesex County See No. 8.

Library Grants: \$3,000 Aug. 1966 Federation agreement with Metuchen Library
from State: \$4,000 in 1969 Essay and General Literature Index-Libraries of
South Middlesex

\$25,064= spread out over three years beginning in 1971 for reciprocal
borrowing program.

There may have been other grants information on which is not readily available.

BAUMGART & BEN-ASHER
Attorneys for Plaintiff

By 
DAVID H. BEN-ASHER
A Member of the Firm

CERTIFICATION

I certify that the foregoing statements made by
me are true. I am aware that if any of the foregoing
statements made by me are wilfully false, I am subject to
punishment.

BY THE MAYOR AND COUNCIL OF
THE BOROUGH OF HIGHLAND PARK

DATED: 