

CA - Metuchen

11-July-1975

Requests for Admissions made by D,
Board of Metuchen, with answers.

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ATTORNEYS FOR Defendant, Borough of Metuchen

Plaintiff

URBAN LEAGUE OF GREATER NEW
BRUNSWICK, ET AL

vs.

Defendant

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

SUPERIOR COURT OF NEW
JERSEY: CHANCERY DIVISION:
MIDDLESEX COUNTY

Docket No. C-4122-73

CIVIL ACTION

REQUEST FOR ADMISSIONS

TO: BAUMGART & BEN-ASHER
134 Evergreen Place
East Orange, N.J. 07018

MARTIN E. SLOANE
DANIEL A. SEARING
ARTHUR WOLF
National Committee against
Discrimination in Housing, Inc.
1425 H Street, N.W.
Washington, D.C. 20005
Attorneys for Plaintiffs

7/11/75

Defendant, Borough of Metuchen, hereby makes Request
for Admissions, pursuant to R. 4:22, et seq;

1. Do plaintiffs admit The Borough of Metuchen has an area of 2.9 square miles?

Admit

2. Do plaintiffs admit that since 1970 Metuchen has amended its zoning ordinance to provide the following:

- a. Permit moderate income senior citizen housing in the R-5 zone.
Admit
- b. Change 2½ acres tract in a R-2 zone into a R-5 zone to accommodate moderate income senior citizen housing.
Admit
- c. Change a four acre tract formerly in a M-1 zone to a R-4 zone to provide for garden apartments.
Admit
- d. Change a five acre tract in a R-2 and R-4 zone into a R-2A zone to provide for townhouses.
Admit
- e. Change the height requirements for moderate senior citizen housing from 35 feet and 3 stories respectively, to 48 feet and 4 stories respectively.

Admit

3. Do plaintiffs admit the National Committee Against Discrimination in Housing, Inc. in a March 1972 report, Jobs and Housing, included as one of a series of "immediate action recommendations," the following:

"a declaration of emergency by the Governors of Connecticut, New Jersey and New York, suspending zoning ordinances in all municipalities with less than 10% of vacant land for multi-family use and with less than 25% of all existing dwelling units in multi-family structures. Such a declaration would be justified under emergency powers to protect the public welfare from the effect of the housing crisis."

Admit

4. Do plaintiffs admit Metuchen has the fifth highest density population in Middlesex County? No, as according to 1970 Census data, population per square mile of land, Metuchen was sixth. Perth Amboy - 8,255 New Brunswick - 7,479

Answer continued on attached page

5. Do plaintiffs admit 20% of Metuchen's vacant land is in multi-housing zones? Admit, assuming "multi-housing" means multi-family housing.

6. Do plaintiffs admit Metuchen's zoning ordinance provides the following zones:

R-1, R-2, R-2A, R-3, R-4, R-5, B-1A, B-1, B-2, M-1

Admit

7. Do plaintiffs admit Multi-family units are permitted in the following zones?

R-4, R-5, B-1A, B-1 and B-2.

Admit

8. Do plaintiffs admit townhouses are permitted in the R-2A zone?

Admit

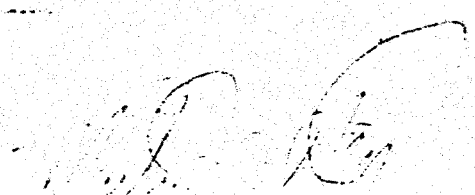
South Amboy - 6,670
Highland Park - 7,571
Dunellen - 7,072
Metuchen - 5,725

9. Do plaintiffs admit Multi-family zones are specifically located in at least six different sections of the Borough?

Admit

10. Do plaintiffs admit two family zones are specifically located in at least three different sections of the Borough.

Admit



MARTIN A. SPRITZER
Attorney for Defendant,
Borough of Metuchen

CERTIFICATION

We certify that the foregoing statements made by us are true. We are aware that if any of the foregoing statements made by us are willfully false, we are subject to punishment.

Dated: July 11, 1975

