

UL v. Carteret (Sayerville)

~1975

exhibit no. 3 - answers to interrogatories
from Eugene Cross Assoc's, planning
consultants to Sayerville

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E. EUGENE CROSS ASSOCIATES
PLANNING CONSULTANTS TO THE BOROUGH OF SAYREVILLE

Answers to Interrogatories Filed by Baumgart & Ben-Asher,
Attorneys for Plaintiffs—Urban League of Greater New Brunswick
Upon the Borough of Sayreville

1. **Population Data.** 1970 Census Estimate of Total Population—32,508
Racial Composition of 1970 Census Population: White—32,137; Black—35; Spanish-Speaking—336
2. **Public School Enrollment.** This firm does not maintain public school enrollment records. The Board of Education of the Borough of Sayreville is the source of this information.
3. **Housing Value by Property Tax Roles.** This question involves a monumental study of the Borough of Sayreville. No such study has ever been made for the municipality. Further, no such study is contemplated under the planning program for the municipality.

The U. S. Census of Housing did provide information pertaining to the true market value of homes in the Borough of Sayreville as of 1970. This information is readily available from the U. S. Census, and may be readily compiled by the plaintiffs.

4. **Multi-Family Dwelling Rent Ranges.** No garden apartment survey has been conducted by the Borough of Sayreville. U. S. Census of Housing did provide information on the rental costs of apartment units in the municipality. This information is readily available to the plaintiffs from the U. S. Census of Housing.
5. **Total Number of Mobile Homes in the Municipality.** To the best of my knowledge, there are no occupied permanent mobile homes in the Borough of Sayreville. They exist as conforming uses under the current zoning ordinance.
6. **Number of Housing Units Currently Occupied which do not Meet Existing Housing Code Standards.** No Borough-wide housing inspection program has been conducted nor is any such strict housing inspection program contemplated. The Borough inspects dwelling units on a complaint and random basis.

The U. S. Census of Housing does provide information with respect to the completeness of plumbing facilities in residential dwellings. This information is readily available to the plaintiffs from the U. S. Census of Housing 1970.

7. **Number of Municipal Employees by Job Category.** This information is available to the plaintiffs from Borough personnel records.

8. Number of County and State Employees Working or Employed in the Municipality. This information is not available. The plaintiffs, if desiring this information, should examine the employee records of the County and State maintained in appropriate offices of these levels of government.
9. Vacant Land by Zoning Use Category. No recent study has been conducted by the municipality to determine the number of acres of vacant land in all zoning districts.
10. Proposals or Requests for Amendment to the Zoning Ordinance to Facilitate Residential Construction since 1970. The Borough of Sayreville adopted a completely new zoning ordinance in 1972 which provides for Planned Unit Development, Townhouse development, and small-lot residential development. The zoning amendments were based upon the comprehensive plan of the municipality and were not a result of private industry requests and/or court mandate.
11. Request for Variances, Special Exception Uses Since January 1, 1970. No chronological list of such applications has ever been compiled for the Borough of Sayreville by this office. This information is readily available to the plaintiffs from the Borough of Sayreville Board of Adjustment minutes on file in the Borough Hall.
12. The Name, Address, and Race of Municipal Officials, Employees and Consultants. This information is readily available to the plaintiff from Borough personnel records maintained at Borough Hall.
13. Existing or Anticipated Subsidized Housing. There is no public housing existing in the Borough of Sayreville. The Mayor's committee for senior citizen housing needs is, however, actively pursuing studies to determine senior citizen housing need for low and moderate income individuals and, further, has contacted State and Federal agencies in this matter.
14. Housing Need Discussion. The Borough of Sayreville, as part of its on-going comprehensive planning program, has examined the issue of housing need associate with economic groups currently residing and/or anticipated within the municipality. These studies are the basis for the amendment to the 1972 zoning ordinance wherein approximately 1200 acres of land were zoned for Planned Unit Development, which zoning district permits the construction of garden apartment, townhouses, and single-family homes on small lots. The decision to amend the zoning ordinance to include Planned Unit Development is directly based upon the determination of existing and future housing needs in the municipality.
15. Municipal Rent Control Ordinance. To the best of my knowledge, the Borough of Sayreville has not enacted a rent control ordinance. Was not drawn by this office, so not to my knowledge.
16. Residential Building Moratorium. To the best of my knowledge, the Borough of Sayreville has not imposed any moratorium on residential construction since January 1, 1970, that being the date of inquiry by interrogatory of the plaintiff.

17. **Residency Requirement for Employment by the Borough.** This information is readily available to the plaintiff from the codified ordinances of the Borough of Sayreville maintained in the Borough Clerk's office.
18. **History of Commercial and Industrial Development in the Borough of Sayreville.** No study has ever been conducted of the chronological development of the commercial and industrial base for large businesses in the Borough of Sayreville.
19. **Fair Housing or Anti-Blockbusting Ordinance.** This information is readily available to the plaintiff in the codified ordinances of the Borough of Sayreville maintained in the Borough Clerk's office at Borough Hall.
20. **Industrial Development.** The Borough of Sayreville has established an Industrial Development Commission. Its purpose is to provide a liaison between the industrial community of Sayreville property owners and the elected Officials of the municipality.
21. **Current Zoning Ordinance.** The existing zoning ordinance of the Borough of Sayreville is readily available to the plaintiff from the Borough Clerk's office.
22. **Official Zoning Map.** The Official Zoning Map is housed in Borough offices. The date of the Official Zoning Map is January 23, 1974. The Zoning Map dated January 23, 1974, and prepared by E. Eugene Oross Associates, Planning Consultants to the Borough of Sayreville shows the exact zone boundaries of all lands in the Borough of Sayreville as of the date of answer to these interrogatories.
23. **Master Plan Adoption.** The Borough of Sayreville officially adopted its master plan on January 7, 1971. The master plan was amended in August of 1973 to include the Planned Unit Development amendment. The master plan contains 28 pages.
24. **Housing Studies Being Conducted.** The Borough of Sayreville is conducting housing studies in conjunction with the preparation of an application for Housing and Community Development Grant for fiscal year 1975. The Borough of Sayreville is an entitlement city as identified under the Housing and Community Development Act.
25. **Housing Reports by Federal, State or County Government Relevant to the Need for Housing, Attitudes Toward Housing, Housing Costs, and Land Available for Housing.** The Borough of Sayreville is listed within various reports of the County of Middlesex Planning Board relating to housing in general. The Borough of Sayreville is also identified in studies conducted by the New Jersey Division of Aging, Department of Housing and Urban Renewal wherein the need for senior citizen low and moderate income housing is identified.
26. **Federal and State Grant Assistance.** The records of grant assistance from Federal and State agencies to the Borough of Sayreville since 1960, the size of the grant, and the use of the funds is public record available to the plaintiff in the records of the Borough Clerk maintained at Borough offices.