Review of Coppole's report Shally (1984)

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DATE: January 7, 1984

TO:

Gagliano, Tucci, Iadanza & Reisner

FROM:

Queale & Lynch, Inc.

William Queale, Jr. P.P.#47, AICP

SUBJECT:

Review of "Fair Share Housing Analysis", December, 1984

Prepared by Richard T. Coppola, PP

As requested, I reviewed Mr. Coppola's report of December 21, 1984 and find the following:

1. The 4-county region has been based on a false premise that Exit 116 is available for public use. This appears on various road maps as an exit, but its main purpose is for access by police and maintenance crews to their facilities. The means of access to these employee areas are signed in some manner to indicate their limited use for employees only, or official use. Although there is a connection from this part of the Parkway to Crawford's Corner Road, it is for the convenience of Parkway personnel. There are barracades to route vehicles around buildings rather than have direct access to the Parkway ramps. Recently, summonses have been issued for the few who have ventured to use these internal roads as an access to and from the Parkway.

The ramps in this area are also part of the access to the Garden States Arts Center. However, the Arts Center can only be reached from the Parkway. Local residents who go to the Arts Center must use either Exits 114 or 117.

It was my calculation that Ocean and Union Counties should be dropped from the region. The closest access to the Parkway is Exit 114. The extra time it takes to get to Exit 114 using local roads makes the difference in being able to reach Ocean and Union Counties compared to traveling on the Parkway assuming the use of Exit 116. The result using Exit 114 is that if these two counties can be penetrated at all, it is only for a short distance along the Parkway (or Turnpike in the case of Union County), and in none of the cases was one able to reach an exit within a 30 minute period.

Finally, it should be noted that recent talk of opening Exit 116 to the general public has been officially objected to by the township. Attached is Memo 84-19 which amends the Circulation Plan portion of the Master Plan.

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- 2. Mr. Coppola used 58... of the substandard housing units as the proportion of the substandard units occupied by low and moderate income households. This was based on the sub-region in which Holmdel is located. I was unable to find the data supporting this percentage. I note that the report prepared by Drs. Burchell and Listokin (Response to the Warren Report: Reshaping Mount Laurel Implementation, December 10, 1984) calculated the portion of deteriorated housing units occupied by lower income households to be 62.7% in the entire Monmouth/Ocean Region [Exh. 6, p.24] using the 3-surrogates from the Warren procedure and with "households properly income-qualified". In my earlier response to Dr. Burchell's special report on the Holmdel matter (Memo dated December 12, 1984), I indicated:
  - "Exhibit 3 for the Monmouth/Ocean Region is presented for subregions and is in a different format. Only the number of deficient units occupied by low income households is identified. (I
    have assumed the "Low-Income" title means "low and moderate" since
    Exhibits 1 and 2 identify low and moderate). Exhibit 3 does not
    give the number of deficient units occupied by "middle and upper
    income" households. Without the "middle and upper income" number,
    the total number of deficient units cannot be determined and
    therefore the percentage of deficient units occupied by
    low/moderate income households cannot be determined".
- 3. Mr. Coppola added a household income factor to that portion of the formula reallocating the surplus indigenous need. I did not. First, I disagree with it in principle as I indicated in my report and testimony. Second, however, it was never my understanding that this income factor was to be used in this portion of the formula. In checking with other planners, I find I was mistaken.

I also note that in Mr. Coppola's technique, he calculates the fair share, then adds the 3% for vacancies which he identifies as the "fair share". The additional 20% for vacant land is then based on the 103%. My objection to this approach is the principle of another 0.6% being added and my concern that every opportunity is used in the court's formula to increase "fair share" numbers when the state-wide numbers are too big already.

5. In Mr. Coppola's Appendix C, his percentages for the 2-county region are similar to mine (I rounded mine off to one decimal place whereas he extended his percentages to three decimal places). The one exception is the percent of employment. I calculated 3.4%. He calculated 4.99%.

The township's 10,976 covered jobs equals 3.4% of the 2-county region's 321,424 jobs (372,325 minus 4,333 jobs in towns completely outside any growth area [Allentown, Farmingdale, Millstone, Roosevelt and Upper Freehold in Monmouth County and no such towns in Middlesex County] minus 46,568 jobs in the Urban Aid towns of New Brunswick, Perth Amboy, Asbury Park, Long Branch and Keansburg).

- 6. Also in Appendix C, Mr. Coppola calculated a prospective need for the region of 38,035. I calculated 36,928 based on 39.4% of 93,725 total units needed. These 93,725 units were based on a population of 1,186,000 needing a total of 460,563 dwelling units less than 366,838 occupied units in 1980.
- 7. The result of Mr. Coppola's higher percentage of a larger number of units (¶5 and 6 above) is the reason why his prospective need for the 2-county region is 2,021 compared to my 1,709.

