

RULES - AD - 1994 - 60

1/20/84

- Final Raymond report re: Bedminster  
Fair share

pg. 5

M E M O R A N D U M

PD-12 end  
11/7/84  
EKS

RUIS-AD-1984-60

TO: Judge Serpentelli, George Raymond, and All Concerned Parties  
FROM: Wallace Roberts & Todd  
RE: Final Raymond Report, January 10, 1984  
DATE: January 20, 1984

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Mr. Raymond's final report (January 10, 1984) assesses Bedminster's Fair Share at 944 units. We reject this figure as too low, and based on WRT's calculation, the Township's Fair Share is 2,008 units. We wish to focus this memo on Bedminster's capability of reaching any amount of low and moderate income housing above the 260 units to be built by the Hills Development Corp.

SITE CAPABILITY

Table 1 summarizes the capacity calculations of the sites selected by Bedminster to meet their Fair Share obligation. By Mr. Raymond's own calculations, the sites will not accommodate enough low and moderate income housing to satisfy his Fair Share estimate; by 1990 he estimates only 506-665 units could be built. Mr. Raymond explains that the additional 279-438 units required to achieve the 944 unit obligation would result in "excessive growth."<sup>1</sup> By our calculation, only 260 units (Hills) will be built without expanded sewer treatment capability as below.

Sewer Capacity

One of the crucial factors upon which any future development in Bedminster lies is sewer capacity (see Table 2). Using Mr. Coppola's assumed output of 240 gallons per unit per

MAXIMUM CAPACITY COMPARISON OF SITES  
ASSUMING SEWER AND SITE AVAILABILITY

Table 1

Site	Coppola <sup>1</sup>		Raymond <sup>1</sup>		Dobbs <sup>2</sup>		Notes
	Total	L&M	Total	L&M	Total	L&M	
1(A)	66	13	66	13	66	13	Needs sewer
2(B)	80	16	80	16	79	16	Needs sewer
3(C)	290	58	165	33	67	13	Most of site developed in single family dwellings; needs sewer
4(D)	36	7	36	7	36	7	Needs sewer
5(E)	199	40	199	40	146	30	Needs sewer
6(F)	306	61	0	0	0	0	Site already developed--single family dwellings
7(G)	514	103	514	103	514	103	Site and developer available, previous proposal in litigation; needs sewer
8(H)	449	90	414	83	414	83	Needs sewer
9(I)	257	51	257	51	0	0	Most of site developed with existing homes on large lots
10(J)	599	120	599	120	599	120	Sewer capacity in question
11(K)	1287	260	1287	260	1287	260	Hills, approved
12(L)	<u>177</u>	<u>35</u>	<u>177</u>	<u>35</u>	<u>177</u>	<u>35</u>	Needs sewer
Total Units	4260	854*	3794	761*	3385	680*	
Realistic opportunity without sewerage						260	

<sup>1</sup>George M. Raymond, Housing Allocation Fair Share and Compliance with Mount Laurel II for Bedminster Township, NJ, January 1984, pg. 39 and 40.

<sup>2</sup>Wallace Roberts & Todd, Response to Draft of The Bedminster Housing Region and Fair Shares, January 3, 1984

\*Notes: These totals are slightly higher than the 20% requirement for low and moderate units due to Hills providing slightly more units and rounding individual figures.

day (gpd),<sup>2</sup> the 4,720 market rate units required to support the allocated 944 low and moderate income units would require 1,132,800 gpd of sewage treatment capacity. Aside from Hills' 1287 units, the remaining demand is for 823,920 gpd.

Mr. Coppola erroneously states that the Environmental Disposal Corporation (EDC) plant can serve sites I, J, K and L.<sup>3</sup> Hills has reserved 800,000 of the 850,000 gallon total built capacity for itself.<sup>4</sup> According to information available to WRT at this time, the Hills development will need all of its allocated capacity (and more) for its own development.<sup>5</sup>

Unless Hills will or can be required to release some of its capacity allocation, reduce the number or type of units in Bernards Township, or build additional capacity requiring more land, additional permits and construction, there is no excess capacity for sites I or J, or any others.

Mr. Coppola presumably includes Site L in the 28,000 gpd reserved for Pluckemin Village. The figures again do not substantiate the claim that this site can be sewered as part of the Pluckemin Village allocation. The 177 units which could be built on Site L would require (at 240 gpd) 42,480 gpd or 1.5 times the total Pluckemin allocation for that site alone.

Clearly then, if any of the sites included in even the "immediate" category (except Hills' 260 units) are to be built, additional sewer capacity is required.

SEWAGE TREATMENT CAPACITY NEEDS

Table 2

"Immediate" Sites\* (Excluding Hills 1287 units which have sewer capacity)

Total Units (Raymond)

I( 9)	257
J(10)	599
L(12)	<u>177</u>

1033 units x 240 gpd/un = 247,920 gpd

"Probably Available Within 3 Years"

E( 5) 199\*\* units x 240 gpd/un = 47,760 gpd

"After 1990"

A(1), B(2), C(3), D(4), G(7), H(8)	<u>1275</u> units x 240 gpd/un = <u>306,000</u> gpd
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Total Units 2507 units

Total Sewage Capacity Needed 601,680 gpd

Capacity Available 0

\*All figures and phasing from Raymond, Housing Allocation..., pages 40 and 55.

\*\*Maximum figure, Raymond suggests this site for 100% low and moderate development.

FOOTNOTES

<sup>1</sup>Raymond, George, Report on Housing Allocation Fair Share and Compliance with Mount Laurel II for Bedminster Township, New Jersey, January 1984, pg. 57.

<sup>2</sup>Letter of January 8, 1984 to George Raymond, attached as Appendix B to Raymond Report, op cit; see also footnote 5.

<sup>3</sup>Op cit, pg. 1.

<sup>4</sup>All of the 850,000 gallon capacity has been allocated. 800,000 gallons is reserved for the Hills Development, 27,500 gallons for the existing development in Pluckemin Village, and 22,500 gallons for the City Federal development, according to the plant operator.

<sup>5</sup>1,287 units in Bedminster x 240 gal/un = 308,880 gal/day  
(includes 260 low and moderate income units)

350,000 sq ft commercial x 0.125 gpd/sq ft = 43,750 gal/day

1,913 units in Bernards x 240 gal/un = 459,120 gal/day

811,750 gal/day

1,913 unit figure from Hills Sales Office representative Cheryl Pickell, 6/83, Fact Sheet 9/28/82 states all Bernards units will be single family dwellings.

According to Dr. Robert Hordon, Water Resources Consultant, the statewide standard for single family dwellings is 100 gallons per capita per day. Multiplying this by the number of people per unit yields the gallons/unit rate. The Center for Urban Policy Research has established the following population per bedroom figures for single family dwellings (rounded to one decimal place): 2 bedroom - 2.5, 3 bedroom - 3.4, 4 bedroom - 4.3, 5 bedroom - 4.9, on this basis the range for single family dwellings is 250-490 gpd per unit. Mr. Coppola's figure of 240 gpd per unit is used here for consistency. However the higher, more accurate single family dwelling rate would yield an even higher figure than the above.