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Memo re. requests for deposits  
by Suburban Action

Pgs. 9

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# Suburban Action

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## Mount Laurel Depositions

### DVRPC Housing Allocation Plan:

(1) Does the allocation plan incorporate present need into its allocation figure. If so, where and how is that need computed. If not, doesn't it seem reasonable for present need to be included in an allocation figure. In fact, hasn't Mount Laurel assumed that such is included by its own assessment and identification of existing need.

(2) How would the deposed identify present housing need. If substandard, overcrowding, and overpayment for housing costs are not included, why not.

(3) Why does the allocation plan allocate a total number of units less than the need estimates made for the region. If this is so, what are the justifications and implications of such a plan policy.

(4) The allocation plan would result in a reduction in the proportion of lower income households in the region and in each county and an increase in the higher income households. If this is so, what are the justifications and implications of such a plan policy. (The plan assumes dollars are constant to 1970.)

(5) What are the bases for the three components of DVRPC's allocation, employment, fiscal capacity, and population. Why were these included, were others considered, why were they not included.

(6) What considerations are included in the three components of change, in particular, removals and population growth.

page two

Burlington County Housing Plan:

(1) What are the bases for choosing the three factors for allocation, availability of land, projected employment, and fiscal ability. Were any other factors considered. If so, why were they discarded.

(2) Is it reasonable to subtract 70 percent of farm and woodland for a policy proposed in 1972 under a different governor and for what I assume is a program not yet acted upon.

(3) What is the definition of vacant land.

(4) Is it assumed that only parcels of 100 acres or more of woodland/farmland are developable as the 70/30% policy seems to imply. Were less than 100 acre tracts included in available developable land category. If not, why not.

(5) Why was density a factor to consider in determining the "envelope." Is there any precedence for this. Most plans, if using land availability as a consideration, use it within the distribution formula as one criterion among many. The "envelope" is more often a need basis rather than a capacity basis for a distribution plan.

(6) What is included in the net demand figure used for the distribution of 1970 needs.

(7) Other definitions are a bit unclear, to me, particularly on page 9 where in the last two paragraphs before the final one, categories do not seem consistent with earlier terminology.

(8) I am not clear as to how the three factors were used in the distribution formula. The plan states they were given equal weight. If land availability is used as the basis for the number of units to be distributed, in developing the envelope, and is used again as a criterion in the distribution formula, hasn't more consideration been given to this factor than the others. What is the justification for this.

page three

Mount Laurel Distribution:

(1) What precedence does Mount Laurel have for developing an allocation plan solely on the basis of land availability.

(2) What should the objectives of a housing allocation plan be. How does the Mount Laurel plan meet these objectives.

(3) Does Mount Laurel believe that its method of allocation is a suitable one for all jurisdictions within the region or within Burlington County. If not, how can it proceed with such a method for itself.

(4) Mount Laurel compares its own land availability figure with that for the County when the two figures were computed differently and for different base years. Does Mount Laurel believe there is any inconsistency here, and, if so, how does it justify that inconsistency.

(5) What rationale did Mount Laurel develop for using land availability as the basis for an allocation plan. What do they believe land availability shows and why is it a suitable basis for allocating low and moderate income housing units throughout a region.

(6) Why did Mount Laurel reject other methods illustrated for allocating housing units, e.g., employment, population, etc.

(7) Does a time table allowing for 17 or, at most, 34 units of low and moderate income housing a year seem a reasonable one for permitting developers or encouraging developers to proceed with attempts to construct low and moderate income housing units in Mount Laurel.

(8) Describe in detail the land figures for flood plains, highways, legally committed land, and other factors, used in determining land availability figure. What precedence does Mount Laurel have in using these methods.

(9) Request detailed explanation of each step in determining present housing needs. In particular:

Step #5: in determining low income residents, this step assumes these are unrelated indivi-

duals, what basis is there for this assumption.

Step #9: there is no indication of where the 187 UI was obtained.

Step #10: there is no basis provided for the 50% figure.

(10) What bases does Mount Laurel have for defining low and moderate income households as those with \$10,000/year and below incomes. What criteria should be used for defining low and moderate income households in a housing allocation plan.