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The Complaint in  
Superior Court

PSS. 34

MM000076C

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SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION - MIDDLESEX COUNTY  
DOCKET NO. *C-4122-73*

URBAN LEAGUE OF GREATER  
NEW BRUNSWICK, a non-profit  
corporation of the State of  
New Jersey; CLEVELAND BENSON;  
FANNIE BOTTS; JUDITH CHAMPION;  
LYDIA CRUZ; BARBARA TIPPETT;  
KENNETH TUSKEY and JEAN WHITE,  
On their own behalf and on  
behalf of all others similarly  
situated,

Plaintiffs,

v.

THE MAYOR AND COUNCIL OF  
THE BOROUGH OF CARTERET;  
TOWNSHIP COMMITTEE OF THE  
TOWNSHIP OF CRANBURY; MAYOR  
AND COUNCIL OF THE BOROUGH  
OF DUNELLEN; TOWNSHIP COMMIT-  
TEE OF THE TOWNSHIP OF EAST  
BRUNSWICK; TOWNSHIP COMMITTEE

Civil Action

COMPLAINT

OF THE TOWNSHIP OF EDISON;  
MAYOR AND COUNCIL OF THE :  
BOROUGH OF HELMETTA; MAYOR :  
AND COUNCIL OF THE BOROUGH OF :  
HIGHLAND PARK; MAYOR AND :  
COUNCIL OF THE BOROUGH OF :  
JAMESBURG; TOWNSHIP COMMITTEE :  
OF THE TOWNSHIP OF MADISON; :  
MAYOR AND COUNCIL OF THE :  
BOROUGH OF METUCHEN; MAYOR :  
AND COUNCIL OF THE BOROUGH OF :  
MIDDLESEX; MAYOR AND COUNCIL :  
OF THE BOROUGH OF MILLTOWN; :  
TOWNSHIP COMMITTEE OF THE :  
TOWNSHIP OF MONROE; TOWNSHIP :  
COMMITTEE OF THE TOWNSHIP OF :  
NORTH BRUNSWICK; TOWNSHIP :  
COMMITTEE OF THE TOWNSHIP OF :  
PISCATAWAY; TOWNSHIP COMMITTEE :  
OF THE TOWNSHIP OF PLAINSBORO; :  
MAYOR AND COUNCIL OF THE BOR- :  
OUGH OF SAYREVILLE; MAYOR AND :  
COUNCIL OF THE CITY OF SOUTH :  
AMBOY; TOWNSHIP COMMITTEE OF :  
THE TOWNSHIP OF SOUTH BRUNS- :  
WICK; MAYOR AND COUNCIL OF :  
THE BOROUGH OF SOUTH PLAIN- :  
FIELD; MAYOR AND COUNCIL OF :  
THE BOROUGH OF SOUTH RIVER; :  
MAYOR AND COUNCIL OF THE :  
BOROUGH OF SPOTSWOOD; TOWN- :  
SHIP COMMITTEE OF THE TOWN- :  
SHIP OF WOODBRIDGE :  
:

Defendants.

Plaintiffs, by way of complaint herein, say:

I. PRELIMINARY STATEMENT

1. Low-and moderate-income persons, both white and nonwhite, bring this action against 23 municipal defendants in Middlesex County seeking to enjoin economic and racial discrimination in housing. They challenge the zoning and other land use policies and practices of defendant municipalities which, by effectively excluding

housing plaintiffs can afford, prevent them from residing in these municipalities in close proximity to job opportunities, and deprive their children of equal educational opportunities.

2. Each of the municipal defendants discriminates against the plaintiffs through the maintenance and operation of zoning and other land use policies and practices which impede and deter the construction of housing they can afford. The policies and practices of all defendant municipalities, taken together, bar plaintiffs from securing housing and employment opportunities throughout a major and expanding market area. These policies and practices also adversely affect the housing market in the rest of the county and the region of which defendant municipalities are a part.

3. Plaintiffs' claims for relief are based upon N.J.S.A. 40:55-32; Article one, paragraphs 1, 5, and 18, of the New Jersey Constitution; 42 U.S.C. 1981, 1982, and 3601 et. seq.; and the Thirteenth and Fourteenth Amendments to the United States Constitution.

## II. PLAINTIFFS

4. Plaintiff Urban League of Greater New Brunswick maintains its offices at 4749 Troop Avenue, New Brunswick, New Jersey 08901. It is a non-profit corporation of the

State of New Jersey, as per Title 15, N.J.S.A. It is an affiliate of the National Urban League, a nationwide organization which, since 1910, has sought to improve the economic conditions of minority persons by, among other things, obtaining equal housing and employment opportunities. The League, on its own behalf and for its members, has a special interest in the need for low-and moderate-income housing in Middlesex County. Its members are directly injured and aggrieved by the zoning and other land use policies and practices of the defendants. Such members are unable to challenge the defendants' conduct without the assistance of the League.

5. Plaintiff Cleveland Benson, a black citizen of the United States, lives with his wife, seven children, and one grandchild in a rented four bedroom house at 425 South 8th Street, Highland Park, New Jersey 08904. In February, 1974, Mr. Benson had to sell a house in Highland Park after living in it for 2 1/2 years, because he could not afford the mortgage payments. He searched for more than a year before locating a two bedroom apartment in Jamesburg in which the entire family lived in grossly overcrowded conditions from March until June, 1974. Mr. Benson earns approximately \$10,000 a year at the Kaiser Aluminum Company in Edison, New Jersey. He is concerned

about his ability to meet the rental payments in his current house and would like to live in less expensive quarters in suburban Middlesex County.

6. Plaintiff Fannie Botts resides at 334 Stockton Street, Apartment 7-G, Perth Amboy, New Jersey 08861. She is a black citizen of the United States. She lives with her husband and three children in a three bedroom apartment in a virtually all-minority public housing project. Family income is approximately \$7,500 annually, from her husband's employment with a trucking firm in Woodbridge, New Jersey. Her children attend nearly all-minority schools. She would like to live in a suburban part of Middlesex County in order to afford her children a better living environment and greater educational opportunities.

7. Plaintiff Judith Champion, a white citizen of the United States, has two children and shares a three bedroom apartment in New Brunswick with a female friend at 12 Eulner Street, South Amboy, New Jersey 08872. Ms. Champion is a student at Middlesex County College in Edison and her only income is from welfare. She would like to live in a house of her own in the suburban part of Middlesex County to provide her children with a healthier environment. She has been unable to find such housing.

8. Plaintiff Lydia Cruz lives at 334 Stockton Street, Perth Amboy, New Jersey 08861. Mrs. Cruz is a

Spanish surnamed citizen of the United States living with nine children in an overcrowded four bedroom apartment in a virtually all-minority public housing project. The project has no recreational facilities and the maintenance of the common areas is poor. The schools her children attend are nearly all-minority. Mrs. Cruz earns a salary of \$6,500 a year as a social worker for the Middlesex County Economic Opportunity Corporation and receives welfare payments of just under \$400 a month. Mrs. Cruz has searched for housing in Edison, Highland Park and other suburban areas of the county but has found nothing she could afford. She would like a house in a racially and economically integrated area free of crime and drug usage.

9. Plaintiff Barbara Tippet lives at 51 Burnet Street, New Brunswick, New Jersey, 08902. She is a black citizen of the United States and lives with her husband and three children in a rented two bedroom apartment. Family income in 1973 was approximately \$10,000, from Mr. Tippet's employment as a painter. Mrs. Tippet has been unable to find less crowded housing closer to her husband's work in an area with better schools, after more than one year of searching.

10. Plaintiff Kenneth Tuskey, a white citizen of the United States, lives at 89 Stillwell Road, Kendall Park, New Jersey, 08824. This is in the township of South Brunswick. He would like to live in a racially and economically integrated community.

11. Plaintiff Jean White lives at 237 Park Avenue, Piscataway, New Jersey, 08854. She is a black citizen of the United States living with eight children and two grandchildren in a rented three bedroom apartment in a black enclave in Piscataway. Her only income is from welfare payments. Ms. White would like to live in a larger house in a racially and economically integrated neighborhood in the Piscataway area, but has been unable to find such housing within her means.

### III. CLASS ACTION ALLEGATIONS

12. Plaintiffs bring this action for injunctive relief as a class action pursuant to Rule 4:32 of the New Jersey Court Rules on behalf of themselves and others similarly situated. The class plaintiffs represent is comprised of low-and moderate-income persons, both white and nonwhite, residing in Northeastern New Jersey, who seek housing and employment opportunities for themselves and educational opportunities for their children in the 23 defendant municipalities, but who are deprived of such opportunities by the



zoning and other land use policies and practices of defendants. In this action joinder of all class members is impracticable; there are questions of law and fact common to the class; plaintiffs' claims are typical of the classes' claims; plaintiffs fairly and adequately protect the classes' interests; common questions of law and fact predominate over questions affecting individual members; a class action is superior to other available methods for adjudication.

13. The defendant city, boroughs, and townships are municipal corporations organized under the laws of New Jersey. The officials, employees, and agents of such defendants are responsible for the enactment and administration of the zoning and other land use policies and practices.

#### IV. FACTUAL ALLEGATIONS

14. Middlesex County, of which these defendants are a part, is located between New York and Philadelphia, astride the Northeastern highway and rail transportation corridors. The location of the transportation lines has been central to the increased commercial, industrial, and residential growth of the county. The county is composed of 25 municipalities all of which are defendants except New Brunswick and Perth Amboy.

15. Middlesex County constitutes a common housing and labor market area, as recognized by the Federal Office of Management and Budget in designating Middlesex County

as a Standard Metropolitan Statistical Area known as the New Brunswick-Perth Amboy-Sayreville SMSA.

16. According to the 1970 census, the population of Middlesex County was 583,813 of whom 40,549 were minorities. Approximately 85 percent of the total county population resides in the 23 defendant municipalities, but less than 50 percent of the minority population. The majority of the county's black and Puerto Rican population is confined to the two municipalities of New Brunswick and Perth Amboy.

17. During the decade of the 1960's, Middlesex County absorbed large percentages of the population increase in Northeastern New Jersey, as the more urbanized counties in the region, such as Essex and Hudson, became fully developed. Between 1960 and 1970 the county's population increased by approximately 150,000, representing over 25 percent of the total growth in the eight counties of Northeastern New Jersey. Population projections show that Middlesex will experience a similar numerical increase over the next two decades.

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/The U.S. Bureau of the Census defines a Standard Metropolitan Statistical Area (SMSA) as generally, a county or group of counties containing at least one city (or twin cities) having a population of 50,000 or more plus adjacent jurisdictions which are metropolitan in character and are economically and socially integrated with the central cities. 1970 Census User's Guide, Part I at 85.

18. Nearly all of the county's population increase consisted of white families and persons who moved into the defendant municipalities. Middlesex accounted for only 6.4 percent of minority population growth in the region. By contrast, Essex and Hudson counties, which accounted for less than one percent of the overall growth in Northeastern New Jersey, absorbed nearly 60 percent of the minority increase.

19. Those minorities who have moved into Middlesex County have been confined largely to the cities of New Brunswick and Perth Amboy. Accounting for only 1.6 percent of the total county growth, the two cities absorbed over half of the county's minority increase. White population in the two central cities decreased by more than 10 percent.

20. The small increase of blacks and Puerto Ricans in the 23 defendant municipalities from 1960 to 1970 was largely confined to areas of pre-existing minority concentration. These areas are characterized by substandard housing, higher density, and less restrictive zoning than white population areas.

21. According to the 1970 census, the median income for all families in Perth Amboy was \$9,413 and in New Brunswick, \$9,589; less than 80% of the median income of more than \$12,000 in the 23 defendant municipalities.

22. The median income for blacks living in New Brunswick and Perth Amboy was less than two-thirds of the median income in the 23 municipal defendants. The median income for Puerto Ricans living in Perth Amboy and New Brunswick was less than half of the median income in the 23 municipal defendants.

23. Since 1960, there has been an increase of more than 100,000 jobs in Middlesex County, the overwhelming majority located in the 23 defendant municipalities. Most of these jobs pay low and moderate wages.

24. The number of housing units produced in Middlesex County has been less than half the number of jobs generated during the same period. The gap between housing units and jobs has been particularly acute for low and moderate wage earners.

25. Most of the low and moderate wage jobs in the county are in the 23 defendant municipalities, while most of the low-and moderate-income housing units in the county are located in New Brunswick and Perth Amboy.

26. Most of the black and Puerto Rican persons who work in Middlesex County are employed in low and moderate wage jobs. Of the blacks and Puerto Ricans who work in Middlesex County, more than 40 percent live outside the county, 37 percent live in New Brunswick and Perth Amboy, and only 21 percent live in the 23 defendant municipalities.

27. In Newark, Elizabeth, Plainfield, and other central cities of Northeastern New Jersey, there are more low-and moderate-income housing units than there are jobs paying low and moderate wages.

28. Statistical projections show that most of the new jobs that will open up in Middlesex County by 1980 will pay low and moderate wages and will be located in the 23 defendant municipalities. Statistical projections also show that by 1980, under current zoning and other land use policies and practices, the gap between low and moderate wage jobs and low-and moderate-income housing units will increase in the 23 defendant municipalities.

29. More than 40 percent of the vacant land in Middlesex County is zoned for industry, a higher percentage than in any other county in New Jersey. More than 90 percent of the county's vacant land is within the 23 defendant municipalities. According to the Middlesex County Master Plan, of the approximately 40,000 acres so zoned, 75 percent, or 30,000 acres, will not be needed for such use. This excessive zoning withdraws at least 25 percent of the developable land in the county from potential use for housing.

30. Adequate housing for plaintiffs and the class they represent is largely unavailable in the defendant municipalities.

(a) The vacancy rate for the 23 defendant municipalities is less than one percent, compared to the accepted standard of three percent as a tight housing market.

(b) There is a scarcity of rental units generally in the defendant communities and an acute scarcity of such units with two or more bedrooms. Such two or more bedroom units as are available are priced at rents beyond the financial capabilities of plaintiffs and the class they represent.

(c) Nearly all single-family dwellings in defendant municipalities sell for prices beyond the financial capabilities of plaintiffs and the class they represent.

(d) Fewer than 1800 family public housing units are located in Middlesex County. Of these, nearly 75 percent are in the cities of New Brunswick and Perth Amboy. Although the defendant municipalities are authorized under state law to establish public housing authorities to provide housing for low-income families, 18 have not established such authorities. In four of the five municipalities that have established public housing authorities, no public housing for families has been built for more than 10 years.

(e) Twenty of the defendants have not passed the resolution of local approval required for the

use of state financial aid to assist low-and moderate-income families with their housing needs.

31. Over 50 percent of the minority public school children in the county attend school in Perth Amboy and New Brunswick, where minority enrollments exceed 60 percent. Schools in the 23 suburban municipalities are over 94 percent white.

32. The Middlesex County Planning Board, as authorized by state law, has prepared and adopted a county-wide master plan which includes provision for the distribution of low-and moderate-income housing throughout the 23 defendant municipalities. None of the defendants has taken steps to implement the low-and moderate-income housing elements of the Plan.

33. The defendants' zoning and other land use policies and practices have denied or otherwise made unavailable to low-and moderate-income persons, both white and non-white, equal access to housing and employment opportunities and denied educational opportunities to their children. Among other exclusionary devices and techniques, the defendants have: <sup>/</sup>

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<sup>/</sup>See Appendix for a description of various exclusionary zoning and other land use policies and practices of each defendant municipality. Said appendix is incorporated by reference and made a part of this complaint as if fully set forth herein.

(a) Forbidden or severely restricted provision of mobile homes, the development of multiple dwellings, especially those with more than one bedroom, and single-family attached housing that plaintiffs can afford;

(b) imposed zoning and building requirements for single-family detached houses, such as large lot sizes, minimum floor areas, and excessive frontage requirements, which have increased housing costs;

(c) refused or otherwise failed to provide federally or State subsidized housing for low-income families; and

(d) zoned vacant land for industrial purposes in excess of need to the exclusion of residential usage.

34. The results of defendants' conduct have been, inter alia, to:

(a) Exclude low-and moderate-income households, especially those with children, from residing within defendant communities;

(b) Confine low-and moderate-income persons, both white and nonwhite, to overcrowded, substandard, and often unsafe, housing within the central city areas;

(c) Ignore the general welfare of the larger region;

(d) Maintain white isolated elite communities of high-income households;



(e) Impose an undue burden on nearby communities which have less restrictive zoning and other land use policies and practices;

(f) Deprive middle- and upper-income white residents of the benefits of racial and economic integration;

(g) Deny to low- and moderate-income persons, white and nonwhite, the right to travel;

(h) Deprive low- and moderate-income persons both white and nonwhite, of access to employment opportunities in suburban communities; and

(i) Deny their children equal educational opportunities.

35. The conduct of the defendants described in the preceding paragraphs interferes with and denies rights secured to the plaintiffs and the class they represent by N.J.S.A. 40: 55-32; Article one, paragraphs 1, 5, and 18 of the New Jersey Constitution; 42 U.S.C. 1981, 1982, and 3601 et seq.; and by the Thirteenth and Fourteenth Amendments of the United States Constitution.

V. PRAYER FOR RELIEF

W H E R E F O R E, plaintiffs pray that judgment be entered as follows:

(1) Permanently enjoining the defendants, their officers, agents, and employees, and all other persons acting in active concert or in participation with any of them, from engaging in any zoning and other land use policies and practices which have the effect of excluding low-and moderate-income persons, both white and non-white.

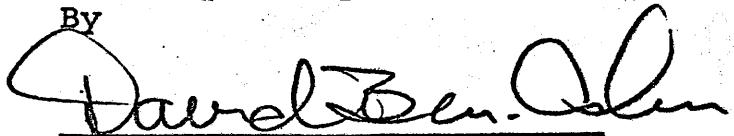
(2) Requiring defendants, individually and collectively, to take reasonable steps to correct past discriminatory conduct by preparing and implementing a joint plan to facilitate racially and economically integrated housing within the means of plaintiffs and the class they represent. In developing and implementing such plan, defendants should be required to solicit and utilize the advice and assistance of appropriate county, state, and federal agencies and programs. Such plan should include a precise program and timetable outlining the steps defendants will take to assure successful and expeditious implementation.

(3) Granting the named plaintiffs the recovery of all costs, including attorney fees, incurred

in maintaining this action, and such further relief as the interest of justice may require and this Court deems appropriate.

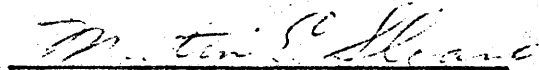
Respectfully submitted

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## APPENDIX TO COMPLAINT

### Exclusionary Zoning & Other Land Use Policies and Practices of Defendant Municipalities

#### 1. BOROUGH OF CARTERET

Carteret prohibits mobile homes.

It permits multi-family dwelling construction only in areas zoned for commercial use, but there is virtually no land so zoned.

The Carteret ordinance prohibits construction of any apartment with more than four rooms and requires that at least 90 percent contain no more than three.

Although the town has available vacant developable acres to meet the low- and moderate-income housing needs of its present and potential residents, an excessive and unnecessary amount of its land is zoned for industrial use.

Carteret has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

Although Carteret has a public housing authority, it has built only 36 units for families in the past decade.

#### 2. TOWNSHIP OF CRANBURY

Cranbury prohibits mobile homes and forbids apartment construction.

Nearly all of its developable land zoned for single-family residences has minimum requirements such as lot area of 40,000 square feet, lot width of 170 linear feet, and floor area of 1,000 square feet.

There is a token amount of land open to houses on 10,000 square foot lots with minimum frontages of 100 feet, but these units must also have minimum floor areas of at least 1,000 square feet.

Cranbury has also zoned an excessive amount of its vacant land for industry.

Cranbury has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

### 3. BOROUGH OF DUNELLEN

Dunellen prohibits mobile homes and multi-family dwellings.

Dunellen has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

4. TOWNSHIP OF EAST BRUNSWICK

East Brunswick prohibits mobile homes.

It provides little vacant land for multi-family use, prohibits the construction of apartments with more than two bedrooms, and requires that at least 80 percent of the units in any project have no more than one.

It subjects single-family dwellings to minimum floor area requirements ranging from 1,250 to 1,500 square feet with much of the land carrying requirements of 150 foot lot widths.

Most of the residential land is zoned for single-family homes on lots of more than one-third acre.

Excessive amounts of land are zoned for industrial and commercial use.

East Brunswick has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

5. TOWNSHIP OF EDISON

Edison prohibits mobile homes.

It permits multi-family use on only a small amount of land.

It requires minimum floor areas in single-family homes from 960 to 1,400 square feet.

Edison also has an excessive amount of land zoned industrial.

Edison has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

Although Edison has a public housing authority, it has not constructed units for families since 1963.

6. BOROUGH OF HELMETTA

Helmetta prohibits mobile homes and apartments.

All of its land zoned single-family residential is subject to minimum frontage requirements of 100 feet and minimum floor area requirements of 1,000 square feet.

Helmetta has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

7. BOROUGH OF HIGHLAND PARK

Highland Park prohibits mobile homes.

It restricts the supply of apartments for households of three or more persons by limiting two bedroom apartments to 15 percent of each project and three bedroom apartments to five percent.

Highland Park has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

Although Highland Park has a public housing authority, it has not built units for families since 1961.

8. BOROUGH OF JAMESBURG

Jamesburg prohibits mobile homes and only allows multiple dwellings by special permit.

It prohibits three or more bedroom apartments and requires that at least 70 percent of the units in each project or building contain no more than one bedroom.

It requires that all single-family residences have a minimum floor area of 1,000 square feet and a lot width of 100 feet.

Jamesburg has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.



9. TOWNSHIP OF MADISON

Madison Township's zoning ordinance was struck down for the second time on April 29, 1974. An appeal has been taken. Its original ordinance prohibited mobile homes. It had an excessive amount of its residential acreage zoned with one and two acre lot requirements, with minimum lot widths of 160 and 200 feet.

It restricted higher density development by limiting the permissible dwelling units per acre ratios in its planned unit developments to 3.5, 4.25 and 5.0, limiting the minimum floor area of the dwelling in such areas to specified gross feet per acre, while at the same time limiting each housing type in the planned developments to maximum density levels of eight dwelling units per acre for townhouses, 10 dwelling units per acre for high density residencials, and minimum average lot sizes of 15,000 square feet for single-family homes.

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The township zoning ordinance was originally held invalid in 1971 at 117 N.J. Super. 11 (1971). The Court stated that the township could not ignore the need for housing within its borders or within its region. The zoning restrictions complained of served to shunt aside those needs. On appeal the Supreme Court remanded that decision for trial to determine the effect of zoning ordinance amendments effective Oct. 1, 1973. The result of that trial was to strike down the amended ordinance as failing to provide housing for at least the low and moderate income resident population. The region which the township must reasonably provide for is "the area from which in view of available employment and transportation the population of the township would be drawn absent invalidly exclusionary zoning." Oakwood at Madison, Inc., v. The Township of Madison, Sup. Ct. of N.J., Middlesex County, Law Division, Docket No. L-7502-70 P.W., April 29, 1974, p.5.

Madison also required minimum floor areas for single-family units ranging from 1,100 to 1,600 square feet.

Madison had an excessive amount of land zoned commercial or industrial.

Madison has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

10. BOROUGH OF METUCHEN

Metuchen's zoning ordinance prohibits mobile homes and permits multi-family use on only an insignificant amount of land.

It subjects single-family detached units to minimum floor area requirements from 1,000 to 1,400 square feet.

Metuchen has not established a public housing authority.

11. BOROUGH OF MIDDLESEX

Middlesex, which prohibits mobile homes, has an inadequate amount of land zoned for multi-family dwellings.

It restricts occupancy by households with more than three persons by prohibiting apartments with more than two bedrooms and requiring that at least 85 percent of the units in new multi-family projects contain no more than one bedroom.

Middlesex has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

12. BOROUGH OF MILLTOWN

Milltown prohibits mobile homes and allows multi-family construction only by special permit.

It requires minimum floor areas for single-family homes ranging from 1,000 to 1,300 square feet.

Milltown has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

13. TOWNSHIP OF MONROE

Monroe Township prohibits mobile homes and bans all multi-family construction except in its planned retirement district, where occupancy is limited to households headed by people over 48 years old.

It subjects all single-family construction to minimum floor area requirements ranging from 1,200 to 1,500 square feet and minimum lot widths from 100 to 150 feet.

Nearly all vacant residentially zoned land requires minimum lots of more than one-half acre.

Monroe also has an excessive amount of land zoned industrial.

Monroe has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

14. TOWNSHIP OF NORTH BRUNSWICK

North Brunswick prohibits mobile homes and the construction of apartments larger than two bedrooms, with two bedroom units limited to 20 percent of the total of any single project.

North Brunswick requires that single-family detached homes have minimum floor areas from 1,400 to 1,800 square feet.

It requires minimum lot widths ranging from 100 to 150 feet, and minimum lot sizes of three-quarter acre for most single-family homes.

It also has an excessive and unnecessary amount of land zoned industrial.

North Brunswick has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

15. TOWNSHIP OF PISCATAWAY

Piscataway prohibits mobile homes.

It has an inadequate amount of land zoned for multi-family use.

It prohibits construction of any apartment with more than two bedrooms and requires that at least 75 percent contain no more than one bedroom.

It requires minimum first floor areas ranging from 900 to 1,300 square feet.

It requires minimum lot widths of 100 and 150 feet for most new single family homes.

It has an excessive amount of land zoned one acre residential and industrial.

Piscataway has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

16. TOWNSHIP OF PLAINSBORO

Plainsboro prohibits mobile homes.

Multi-family units are limited to its planned unit development zones or service residential zones by special permit. In the former case 75 percent of the units can contain no more than one bedroom; in the latter, 90 percent.

Almost all of Plainsboro's residentially zoned vacant land requires minimum lot widths of 200 feet and lot sizes of one-half acre.

Plainsboro has an excessive and unnecessary amount of land zoned industrial.

Plainsboro has not established a public housing authority.

17. BOROUGH OF SAYREVILLE

Sayreville prohibits mobile homes.

It requires minimum floor areas of 1,000 square feet for each single-family detached home and each townhouse.

It prohibits any two adjacent buildings in its planned unit development from having the same exterior and limits the maximum units per acre to 4 and 4.5 in the planned unit development. Public housing for the elderly is exempt from this density limit, but not housing for families.

Sayreville requires a minimum lot width of 100 feet for every single family detached dwelling.

The borough has also zoned an excessive amount of land for industrial use.

Sayreville has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

18. CITY OF SOUTH AMBOY

South Amboy prohibits mobile homes and allows apartments only by special permit.

It restricts multiple family dwellings to 20 percent of the units with more than one bedroom.

South Amboy has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

Although South Amboy has a public housing authority, it has not built units for families since 1952.

19. TOWNSHIP OF SOUTH BRUNSWICK

South Brunswick limits mobile homes to its three existing mobile homes parks.

It limits all multiple dwelling units to its planned residential district and requires insufficient units for low- and moderate-income occupancy.

It requires a minimum floor area of 1,000 square feet for single-family detached homes, with nearly all land so zoned requiring a one acre minimum lot area and a lot width of 150 feet.

It also has an excessive amount of land zoned industrial and commercial.

South Brunswick has not established a public housing authority.

20. BOROUGH OF SOUTH PLAINFIELD

South Plainfield prohibits mobile homes and multiple dwellings.

It requires minimum floor areas for single-family homes from 1,250 to 1,500 square feet, with lot widths of 100 to 150 feet and minimum lot sizes of 15,000 to 40,000 square feet for all but an insignificant amount of residentially zoned land.

South Plainfield also has an excessive amount of land zoned industrial and commercial.



South Plainfield has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

21. BOROUGH OF SOUTH RIVER

South River prohibits mobile homes and restricts multi-family dwelling units to 15 percent of the total number of single-family dwellings in the Borough.

It allows multi-family dwellings only by special permit on determination of the Board of Adjustment that the project "shall be economically stable and advantageous to the community."

It limits the maximum number of rooms in multi-family dwellings to four per apartment, with no more than 20 percent of the units exceeding three rooms each.

The Borough requires that single family dwellings have minimum lot widths of 100 feet and minimum floor areas of 1,250 square feet of which not less than 700 square feet shall be upon the ground floor.

South River has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

22. BOROUGH OF SPOTSWOOD

Spotswood limits licenses for mobile home parks to one for each 1,000 population and limits occupancy in such units to people over the age of 52 without children.

Its vacant land zoned for multi-family dwelling units is insignificant. Apartments larger than two bedrooms are prohibited, and 90 percent are limited to efficiency or one bedroom apartments.

It also requires that single-family detached homes have minimum lot widths of 100 feet and minimum floor areas of 1,300 square feet.

Spotswood has not established a public housing authority and has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

23. TOWNSHIP OF WOODBRIDGE

Woodbridge Township prohibits mobile homes and allows multi-family dwellings only by special permit, with the requirement that 80 percent of the multi-family units not exceed one bedroom.

It requires that single family dwellings have minimum floor areas from 900 to 2,000 feet.

It has an excessive amount of land zoned commercial and industrial.

Woodbridge has not passed the resolution of local approval required for the use of state financial aid to assist low- and moderate-income families with their housing needs.

Although Woodbridge has a public housing authority, it has not built units for families in over 20 years.