

U.L. v. Carteret, South Plainfield (Elder Lodge) Sept 12 1984

- - letter to Judge re copy of report by Robert Strong (Not enclosed)
- letter from Judge to counsel acknowledging above letter

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September 12, 1984

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SEP 14 1984

Honorable Eugene D. Serpentelli  
 Judge, Superior Court of New Jersey  
 Court House, CN2191  
 Toms River, New Jersey 08754

JUDGE SERPENTELLI'S CHAMBERS

re: Elderlodge, Incorporated  
 South Plainfield, N. J.

Dear Judge Serpentelli:

With respect to the remand of the Board of Adjustment in this matter, pursuant to your Order, the matter was re-heard by the Board on August 28, 1984. At that time, Robert Strong, our Planner, had not had sufficient time to complete his written report summarizing his testimony. We, therefore, requested the matter be adjourned to permit the submission of his report and to allow for questions regarding same.

On September 4th, a written report was not available and the Board, therefore, adjourned the matter to October 2, 1984. Under date of September 10, 1984, I supplied the Board with ten (10) copies of the enclosed report entitled: "An Analysis of the Fair Share Housing Obligations of the Borough of South Plainfield as Related to the Zoning Application of Elderlodge Incorporated". The report was authored by Robert Strong.

I am providing Your Honor with a copy of this report, not so much for your review of the methodology as I am for your academic interest in Mr. Strong's reference to alternate methodologies set forth on Page 26, etc. I thought that Mr. Strong's comments would be of some interest to Your Honor and am, therefore, providing them to you.

Respectfully yours,

  
 Angelo H. Dalto

AHD/tar  
 Enc.



# Superior Court of New Jersey

CHAMBERS OF  
JUDGE EUGENE D. SERPENTELLI

OCEAN COUNTY COURT HOUSE  
C.N. 2191  
TOMS RIVER, N.J. 08754

September 19, 1984

Angelo H. Dalto, Esq.  
Abrams, Dalto, Gran, Hendricks & Reina  
1550 Park Avenue  
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South Plainfield, N. J. 07080

Re: Elderlodge

Dear Mr. Dalto:

I wish to acknowledge and thank you for your letter of September 12, 1984.

I am pleased to receive Mr. Strong's report since it is my desire to consistently consider any possible refinement which would improve the methodology described in the Warren Township formula. I trust that I am free to share Mr. Strong's thoughts with others who are interested. In particular, I am making a copy of pages 26 through 35 of the report and am sending, by copy of this letter, to Carla L. Lerman who chaired the consensus committee. Some members of that group are in the process of having further deliberations concerning the compliance issues. She may wish to discuss Mr. Strong's comments as part of their ongoing work.

With regard to the Elderlodge case, it is my understanding that while you are continuing your efforts before the Board of Adjustment, the rezoning process in South Plainfield is intended to accommodate your project. If I am incorrect in that regard, kindly advise.

Very truly yours,

EDS:RDH  
cc: Carla L. Lerman, P.P.

Eugene D. Serpentelli, JSC