

UL v. Piscataway

1/11

(1985)

Letter discussing site 49 in Ms. Lerman's
(IA, 2 + 10A in Block 845) report

2 pgs

CA000 ~~77~~ 8L
797

Handwritten initials

JAMIESON, MOORE, PESKIN & SPICER

A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW

300 ALEXANDER PARK • CN 5276

PRINCETON, N. J. 08540-0560

(609) 452-0808

CRAWFORD JAMIESON (1927-1967)
PETER P. WALSH, JR. (1938-1973)

HERBERT FRANKLIN MOORE
BURTON PESKIN
THOMAS C. JAMIESON, JR.
MICHAEL F. SPICER
ARTHUR MEISEL*
STANLEY C. VAN NESS
JAMES J. BRITT, JR.
THOMAS G. McMAHON**
FRANCES GOLDMARK
THOMAS P. WEIDNER
MARK L. FIRST
MELVIN S. NAROL*
DOUGLAS G. SANBORN

KEVIN J. MOORE
DENNIS R. CASALE
KEVIN L. LILLY
ANN F. KIERNAN
NEAL L. SCHONHAUT
NANCY F. KRAUT
ALBERT E. CRUZ
MICHAEL M. DICICCO
GAIL L. GRUNDITZ

RECEIVED

JAN 14 1985

JUDGE SERPENTELLI'S CHAMBERS

ISRAEL SPICER
JOHN S. KRAMER
OF COUNSEL

TRENTON OFFICE
CAPITOL PLAZA HOTEL
SUITE 829

240 WEST STATE STREET
TRENTON, N.J. 08608-1070
(609) 396-5511

PLEASE REPLY TO PRINCETON

January 11, 1985

*ALSO ADMITTED IN N.Y.
**ALSO ADMITTED IN D.C.

Phillip Lewis Paley, Esq.
Kirsten, Frieman & Cherin
17 Academy Street
Newark, NJ 07102

RE: Urban League of New Brunswick
v. Township of Piscataway

Dear Mr. Paley:

Please be advised that this office has been retained by Mr. & Mrs. Ezra Zeloof, who received a copy of the December 11, 1984 order of Judge Serpentelli in the above referenced matter. Mr. & Mrs. Zeloof own property in Piscataway, including Lots 1A, 2 and 10A in Block 845, as shown on the tax map. We have also obtained a copy of a report by Carla L. Lerman, in which Lots 1A and 2 are identified along with certain other lots in the area as appropriate sites for higher density residential development. (Site #49).

Handwritten signature

Upon preliminary review it is our clients' position that these lots may be appropriate for higher density residential development, some part of which could include low and moderate income housing. Indeed, Lot 10A, Block 845, although not analyzed by Ms. Lerman, may also under appropriate conditions be utilized for that same purpose as it is adjacent to Lot 10, which is so analyzed and found conducive to construction of higher density housing.

JAMIESON, MOORE, PESKIN & SPICER
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW

Page 2
Phillip Lewis Paley, Esq.
January 11, 1985

As we just received Ms. Lerman's report recently, our clients have not had the opportunity to do a more thorough review. However, we do have some preliminary observations. First, it should be noted that feasibility of constructing residential housing at a higher density at this site depends to a great degree upon appropriate access to the site from the proposed Hoes Lane extension. Additionally, although our clients agree that a density of 15 units per acre is appropriate, their view is that a mandatory set-aside for lower income housing in excess of 20% may not be feasible. Positive factors include the fact that engineering for sewers with regard to the site has been completed and a permit to connect has been approved. Water is connected to the site. Of course, certain zoning restrictions currently applicable to the site (for example, set back requirements) may need to be further reviewed and possibly adjusted.

In sum, our clients endorse Ms. Lerman's site selection and we request that our clients' views be considered in this matter by the Township in developing an appropriate response to its Mount Laurel obligation. Our clients wish to particularly stress again that Lot 10A, which consists of 1.96 acres, should also be seriously considered for inclusion as an appropriate site to develop at a higher density, perhaps in conjunction with Lot 10 which has already been identified as an appropriate site by Ms. Lerman.

Thank you for your consideration in this matter.

Very truly yours,



DENNIS R. CASALE
For the Firm

DRC/brl

cc: Hon. Eugene D. Serpentelli, J.S.C.
Mr. & Mrs. Ezra Zeloof, w/copy of Lerman report
Carla L. Lerman
Bruce S. Gelber, Esq.
Barbara Williams, Esq.