

Piscataway 1985

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letter to National Committee Against Discrimination re:
summary of testimony

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January 21, 1985

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Bruce Gelber, Esq.
National Committee Against Discrimination
in Housing
733 15th Street, N.W.
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Washington, D. C. 20005

Re: Urban League of Greater New Brunswick,
et al. vs. The Mayor and Council of
the Borough of Carteret, et al.

Dear Bruce:

Herewith, as we discussed, a detailed summary of the testimony to be offered at Trial with respect to each of the sites deemed satisfactory for Mount Laurel development by Carla Lerman in her November 10, 1984 report. The following analysis represents that testimony to be offered by Henry A. Zanetti, Director of Public Works and Township Engineer for the Township of Piscataway. But for Site 60, the sites are arranged in numerical order; Site 60 will be treated last because of its unique character.

A. Site 1: Site 1 consists of approximately ten acres adjacent to New Brunswick Avenue. While Ms. Lerman's report is

correct insofar as it alleges that Piscataway's master plan views New Brunswick Avenue as ultimately be widened to 104 feet, that width is unrealistic for several reasons. First, the South Plainfield master plan prescribes a width of only 66 feet for the road; the eastern half of the roadway is located in that municipality. Second, the existing residential development in Piscataway and South Plainfield extends well into the proposed 104-foot right-of-way; therefore, in order to effect the widening to that dimension, homes would have to be condemned. Quite frankly, it was only upon preparing this material that I learned that that roadway is proposed for widening to 104 feet. I do not believe that that is practical. Even if widened to 66 feet, New Brunswick Avenue will be an insufficient traffic corridor for the proposed additional traffic produced by the recommendations (if adopted) contained within Ms. Lerman's report.

With respect to sanitary sewers, there is no sanitary sewer along New Brunswick Avenue. An extension of an existing sanitary sewer would be required from a point 200 feet north of the site. In addition, during the past year, the Township sought to construct a sanitary sewer in an adjacent neighborhood to the west, in connection with a project known as the Arbor

Storm Drainage Project. At that time the Township learned that subsurface soil conditions in that adjacent neighborhood present a condition known as "running sand", which makes the installation of sanitary sewerage extraordinarily difficult and costly. The same is true for any underground installation, including storm drainage.

B. Site 2: Site 2 is a tract owned by Harris Steel Company consisting of approximately 125 acres. The northerly portion, approximating 15 acres, is inappropriate for any construction, lying within flood plain.

With respect to roadway conditions, the same analysis of New Brunswick Avenue as described for Site 1 pertains to this property. If New Brunswick Avenue is to be widened at all, all widening must take place on the Piscataway side, because of the existence of the owner's steel fabricating plant located several hundred feet to the south in South Plainfield. As with Site 1, existing residential developments (Samptown Estates and homes appurtenant to Lakeview Avenue) would limit the extent to which the roadway can be widened. The property to the east of New Brunswick Avenue is also owned by Harris Steel, lying within South Plainfield. To the best of my knowledge

and belief, this property was one of those sites targeted for Mount Laurel development as a part of the settlement reached between South Plainfield and the Urban League. The effect of Mount Laurel development on that Site will add to an already difficult traffic problem.

With respect to sanitary sewers, the closest sanitary sewer lies across the railroad tracks to the north of the subject property, and is physically separated from the site by the railroad tracks, flood plain and New Market Pond. The line to which sanitary sewerage for Site 2 would be connected is already at capacity and could not assume any additional burden.

With respect to storm drainage, an extensive internal storm drainage system would be required to develop this site for high density residential use. The site is tributary to an existing brook which is at capacity, sometimes flooding, and which has been improved by a culvert near Lakeview Avenue which is presently insufficient for storm drainage purposes.

C. Site 3: Site 3 (together with Site 68, a small appurtenant tract) approximates 28 acres in area. Site 3 itself has been zoned for shopping center development for years. Indeed, a prospective developer of a shopping center has submitted detailed

plans to the Township and has proposed extensive drainage system servicing the planned shopping center, which is absolutely essential for any development within this Site.

With respect to traffic, the surrounding roads are typically neighborhood residential roads of narrow width. This area being the most densely populated within the Township, the existing road network is unsatisfactory for the present demand, and the development of high density residential units would add to what is rapidly becoming an impossible burden.

With respect to sanitary sewerage, the Site is served by two trunk-lines, one coming from an adjacent apartment development of approximately 3,000 units, the second lying generally to the east. There have been considerable problems during the past few years with lack of capacity for this Site as to sanitary sewerage, because the sewers were installed to service a projected density in the area of four units to the acre, in accordance with standard engineering specifications and plans at the time. We have had numerous complaints of the sanitary sewerage from this particular area boiling up in people's cellars.

In addition, it should be pointed out that a fuel transmission line runs through the property, requiring that any development be structured so as not to interfere with the transmission

easements. The proposal for shopping center development does take the existence of this transmission line into account.

D. Site 6: Site 6 is a 55-acre tract adjacent to Old New Brunswick Road. Ms. Lerman has proposed that high density residential development on this property include consideration of the widening of the overpass constituting part of Old New Brunswick Road and extending across Route 287, several tenths of a mile to the southwest. This proposal was examined and evaluated by the Township within the past three years and was discarded because of the estimated \$5,000,000 cost of the anticipated construction. The master plan of Piscataway calls for a collector road through the Site, generally appurtenant to the railroad tracks at the southerly portion of the Site, connecting the intersection of Old New Brunswick Road and North Randolphville Road to the intersection of Stelton Road and Cumberland Avenue, parallel to the railroad tracks. In addition, directly adjacent to the railroad tracks is a 30-foot pipeline easement; consideration of both the pipeline easement and the proposed collector road would limit the available acreage for any development. Presently, the traffic on Old New Brunswick Road and Stelton

Road in the vicinity of this Site can only be characterized as terrible. Both roads serve as feeders to the industrial park to the south and west of the Site; it is not uncommon for individuals to wait considerable periods of time before exiting from roadways leading out of the apartment developments directly across the street. Indeed, the area directly in front of this Site is supervised by traffic patrolmen every weekday morning and evening.

As to sanitary sewers, those adjacent to the Site are presently at capacity. A trunk-line would have to be installed to connect the Site with existing sewer lines to the south of the railroad tracks; this would require a line perpendicular to and underneath the railroad tracks.

With respect to storm drainage, the Township reviewed a proposal several years ago for single family residential development on a portion of this Site. At the time of that review, the existing storm drainage pipes were insufficient for dwelling proposed to be constructed at four to the acre. The closest storm drainage piping is southwest of the Site under the railroad tracks, but it is inferior in size to meet high density. Besides the fuel oil pipeline, there also exists on the Site towers for high-tension wires, which strongly impacts upon the appropriateness

of the Site for dense development.

Sites 7 and 8: These Sites consist of approximately 125 acres, 88 acres of which (Site 7) have been previously zoned for high density residential development. Site 8 is appurtenant to an existing industrial development (Rheo Metrics, Inc.), and any residential development on that Site will require adequate buffering from that facility.

With respect to traffic problems, Grandview Avenue, generally appurtenant to this Site, is 36 feet wide, and all other connector streets are 30 feet wide. These narrow roadways suggest that density should be strongly limited.

With respect to storm drainage, any residential development on Site 8 will require extensive interior storm drainage work, together with offsite drainage improvements connecting to the Ambrose Brook. To the best of my knowledge, a portion of the combined Sites has been designated "wetlands" by the Department of Environmental Protection of the State of New Jersey, and I understand that plans seeking approval of development related to the wetlands designation are either being prepared or have already been submitted to the DEP with respect to Site 7.

I further wish to point out that adjacent to this

Site is a railroad which bears an insufficient crossing; indeed, the crossing requires motorists to pass over five tracks. Piscataway has had considerable difficulty during the past years with various railroad crossings, which have proven to be dangerous and sometimes fatal. Furthermore, various Government agencies have conducted extensive studies as to the residual radio-activity in the vicinity of the Ambrose Brook and its bed, based upon the former location of a green base in Middlesex, New Jersey, near to the Site, used during and after World War II for the processing of uranium. Silt carried from that location had been used in the past as a source of fill, and studies have been virtually continual as to the effect of this situation. Till such studies are completed, prudence would dictate limited development in this area.

E. Sites 9, 10, 12 and 13: This parcel consists of 150 acres and has been generally used for agricultural purposes historically. I believe it appropriate to treat all these parcels as one, particularly in light of Ms. Lerman's recommendation that any development on these Sites be coordinated.

These Sites are appurtenant to River Road, a County roadway, which, as long ago as 1967, was filled to

capacity. The master plan has proposed that River Road in this area be widened to four or five lanes, which will require extensive improvements. It is not feasible to use the existing connector roadways as routes leading to and from proposed high density development; the Wynnewood Residential Development has roads only 24 feet wide, of inferior structure and inadequate pavement. The roads in the Possumtown area to the east of these tracts are similarly inadequate.

With respect to sanitary sewers, an existing sewer is available along Maplehurst Lane, but the adequacy of that piping is strongly in question considering the proposed density of any development on these Sites. As earlier indicated, those sanitary sewers were installed at a time when no one anticipated proposals for high density development in the area and are designed for minimal density (four units to the acre) at most.

With respect to storm drainage, the drainage system in Possumtown, to the east, is inferior. Although a drainage system does exist to the west, it is separated from the Site by private property, and easements and other property rights would have to be obtained.

In addition, these tracts lie directly to the south of heavy manufacturing industrial uses, including a plant which is currently manufacturing phenol through a cumene-based process. To the best of my understanding, the Township has instituted litigation against the owners of that plant, alleging that the manufacture of such chemical compounds at that location constitutes a violation of air-pollution legislation, the law of Common Nuisance, and Piscataway's municipal ordinances. The existence of that facility may have a considerable effect upon the extent to which residential development should be permitted on that Site at any density.

In addition, eight to ten acres of this Site are planned for municipal recreational use.

F. Site 31: Site 31 consists of approximately eleven acres. Along the southerly edge of the tract is a 50-foot easement permitting access to the Randolphville Elementary School located to the east of the Site.

With respect to sanitary sewerage, a connection to the trunk-line along the Ambrose Brook would be required which would entail the installation of offsite improvements and the obtaining of offsite easements, which may prove time-consuming and costly.

G. Sites 32, 33 and 34: These Sites consist of approximately 120 acres and are located to the west of South Washington Avenue generally in the central portion of the Township. South Washington Avenue constitutes the only feasible access to these Sites; at the present time, it is a 50-foot wide roadway planned to be expanded to 66 feet wide, containing four undivided lanes. There is no possible connection that can be made to Centennial Avenue, owing to the existence of Green Acres property and the cost entailed in the crossing of the Ambrose Brook in the vicinity. No connection to Woodland Avenue and other small roadways is feasible because of the inferior nature of the existing roads servicing the Lake Nelson residential area to the south, the average width of each roadway being between 15 feet and 20 feet. These roadways cannot service new residences built to the recommended density.

With respect to sanitary sewerage, the topography of the Site is characterized by a crest bisecting the tract running in an east to west direction. The northerly portion of these Sites is tributary to the proposed expanded trunk-line running parallel to the Doty's Brook; the closest existing

trunk-line requires a 2400-foot connection in a northwesterly direction and across a brook, at considerable cost. The portion of these Sites southerly to the crest is tributary to an existing trunk-line on Lakeside Drive North, which requires an extension and connection some 400 feet from the southern portion of these Sites, also not inconsiderable as to cost.

With respect to storm drainage, the same general tributary system as described above applies, except that with respect to the northerly portion of the tract, a storm drainage system exists several hundred feet to the north. In connection with this, Doty's Brook should be studied as to its carrying capacity and the necessity for down-stream improvements or retention basins in connection with any development tributary to that Brook. With respect to the southerly portion of the Site, offsite drainage will be required into Lake Nelson, a widened portion of the Ambrose Brook created by the installation of, some fifty or sixty years ago, an earthen dam, with concrete spillway. Severe flooding may be implicated by the proposed high density residential development. Even now, the flooding area for a 100-year storm covers the earthen dam, and the area of such flooding will increase following the installation of high density residential development.

In addition, it should be noted that the Department of Environmental Protection has concluded that the dam is inadequate and should be repaired. It should also be pointed out that the dam and the lake itself are owned by an association of private homeowners adjoining the lake and is not municipal property.

The Sites are transversed by the Susquehanna Pipeline and by three high-pressure gas pipelines owned by the Texas Eastern Transmission Company containing vaporous gas and requiring 75-foot clearance at a minimum, for any proposed development. In addition, I respectfully submit that some portion of this Site should be utilized to add to limited park and recreational facilities existing in this portion of the Township.

H. Site 35: Site 35 is an existing dairy farm approximating 75 acres, abutting South Washington Avenue to the east. Several residences and farm buildings, including stables, barns, and the like, are located on the Site. The Site falls in the intersection of South Washington Avenue and Metlars, both heavily travelled roadways. While some improvements are projected for both roadways, those improvements will not service additional residents until they are in fact constructed. One of the improvements referred to

in Ms. Lerman's report has already been completed, that being the installation of a traffic signal at that intersection, and modest widening of the intersection.

With respect to the sanitary sewerage, a connection would be required to a trunk-line 4800 feet to the north of this property. A trunk-line does exist to the south of this property, but that trunk-line has insufficient capacity for any high density development, and like the other sewer lines in Piscataway, was constructed in anticipation of much lower densities.

With respect to storm drainage, a storm drainage system does exist appurtenant to Metlars Lane, but that drainage system is dramatically inferior and cannot be expected to service any high density development. The storm drainage improvements required would be substantial and would have to lead into Lake Nelson, in the same manner as the analysis for the Site immediately above.

As earlier pointed out, in connection with the interior road system to be developed on Site to Centennial Avenue is not feasible because of the existence of County Green Acres parklands directly to the north of the Site.

I. Site 37: Site 37 is between seven and eight acres adjacent to Haines Avenue, just west of Stelton Road.

Traffic along Stelton Road in the vicinity of this proposed development is fierce. The implicit suggestion that alternate traffic servicing could be had along Brookside Road is absolutely inappropriate, that road having inadequate pavement and of a very narrow width.

With respect to storm drainage, an existing drainage system does exist on the southwest corner of the Site in the vicinity of Poplar; this system can only be described as extremely inferior and is inadequate now, and unable to assume any additional burden.

This Site is generally appurtenant to a municipal park and was planned for expansion of that recreational facility, at least in part. While it is true that a site of less than eight acres should not be expected to increase traffic substantially, it should also be pointed out that a fire house exists directly across Haines Avenue from this Site, and the narrowness of Haines Avenue causes the Fire Commissioners and Volunteer Fire Personnel of the Township to be extremely concerned about preserving their ability to exit the fire house and to get quickly to Stelton Road, several

hundred feet to the east. Indeed, not five years ago, a proposed commercial development on the corner of Stelton Road and Haines Avenue was resisted strongly by the Fire Commissioners because of the additional traffic to be generated by that development (it was a car wash) which would prevent the fire fighting vehicles from rapid egress from their driveway. The same constraint should prevail with respect to residential development.

I. Site 38: Site 38 is an area approximately 30 acres adjacent to Ethel Road West. This property has been zoned for high density residential development by our Municipal Zoning Ordinance, but several comments are appropriate in analyzing development of this property.

With respect to traffic, the Stelton Road traffic is substantial, and the interior paper streets and other appurtenant existing residential streets are inadequate for very high density development. Ethel Road itself is a local road, substantially narrower than the 66-foot right-of-way to which it should be expanded. Any development on this Site must be characterized by exceptional interior circulation, and the widening of Ethel Road to permit potential connection through Ethel Road to New Durham Road and ultimately Route 287, in Edison Township.

With respect to storm drainage, there are two brooks, one to the north and one to the south which are inferior to take on additional burdens, a fact of substantial concern to the public. To the east of the bulk of this Site is a small triangular parcel appurtenant to an existing development of high density in Edison Township. When the developer of that Site proposed the development before the Edison Planning Board, substantial numbers of Piscataway citizens appeared before the Edison Township Planning Board in order to comment on the proposed drainage impact; indeed, the Chairperson of the Piscataway Environmental Advisory Commission made a presentation to the Edison Planning Board requesting that the proposed density of that development be reduced, because of drainage problems. The potential impact of excess drainage and possible flooding are such that substantial off-site improvements will be required to provide adequate drainage.

J. Site 42: Site 42 is a 32-acre working farm which has been operated by the same owner for many years. The owner has communicated with the Township to indicate her intent that a procedure be developed whereby the farm can be preserved as a working farm in perpetuity; I am unaware of the specific

implementation of this request, if any.

With respect to traffic, this Site is in a rapidly developing area of the Township and is appurtenant to an intersection scheduled for substantial improvement (that being the Suttons Lane-Metlars Lane intersection). Presumably, traffic from this Site would proceed along Metlars Lane, which now is a heavily traveled County roadway with numerous curves and bends in the vicinity of this Site.

With respect to sanitary sewerage, off-tract improvements would be required to connect with an existing trunk-line approximating 500 feet in existence from the Site.

With respect to storm drainage, similar extensive off-tract improvements would be required in order to connect to an existing storm drainage system adjacent to the University Heights development, approximately 1,000 feet from the Site.

K. Site 43: This is an approximately 14-acre tract located across Morris Avenue from Site 45 (Gerichont Farm No. 2), which is the subject of litigation instituted against the Township. Any development on this Site must take into account the Hovnanian development on Gerichont Farm No. 1, diagonally across Morris Avenue from this Site. Morris Avenue is now

24-feet wide and can best be described as a narrow-country lane; although Morris Avenue is proposed for widening to 66 feet, until such widening takes place, Morris Avenue is insufficient for the traffic resulting from the more than 1,000 additional residential units proposed for development in its central portion.

With respect to storm drainage, no development should take place without the installation of a box cover across Morris Avenue, and without imposing upon the developer the responsibility for substantial down-stream cleaning of those brooks which service this Site and the other Sites off Morris Avenue, generally adjacent thereto.

With respect to sanitary sewerage, a sanitary sewer main does exist along the portion of Morris Avenue, and connections will be required to be installed from this Site, at a distance approximating several hundred feet. The same caveat with respect to sanitary sewers exists for this Site (and the other Morris Avenue Sites) as was previously discussed, concerning the original design of the sanitary sewer system and its inability to service numbers of developments of high density.

L. Site 44: Site 44 is a tract consisting of somewhat less than 28 acres located between two cemeteries. A developer originally proposed the construction of low-density townhouse development on this Site and has submitted a plan for such development to the appropriate municipal agencies. The same developmental constraints, as are applicable to Site 43, apply to this Site as well.

M. Site 45: Site 45 (Gerickont Farm No. 2) consists of approximately 40 acres on the southerly side of Morris Avenue, adjacent to the Hovnanian development on Gerickont Farm No. 1. The same constraints addressed with respect to Site 43 apply to this Site as well.

O. Site 46: This Site consists of 55 acres and has been zoned by the Township of Piscataway for high density residential development; all required approvals have been received for the construction of approximately 550 dwelling units by Hovnanian. The same general constraints exist with respect to this tract. It should be noted that as part of the approvals obtained, the developer is required to construct a 36-foot wide road through its Site, connecting Morris Avenue to the proposed Hoes Lane, and the developer was required to use heavier pavement than he had originally proposed, because of the anticipated traffic flow

over that Site. Pavement of similar character should be installed, where appropriate, on the other Morris Avenue Sites.

P. Site 47: Site 47 is a nine-acre site appurtenant to Site 46, which is to abut the new section of Hoes Lane planned for construction between 1985 and 1986. This Site will be burdened by the 36-foot wide access road extending through Site 46, which will divide this Site roughly $3/4-1/4$, so that the 250 linear feet of length will be isolated for development purposes from the balance. The access roadway will consist of 36 feet of pavement with a 60 foot right-of-way. The same general constraints, as were discussed in connection with the other Morris Avenue Sites, apply here with respect to drainage and sewerage.

Q. Site 48 (with Site 63): Site 48 approximates six acres in area; Site 63, which is municipally owned, approximates 2.85 acres. These two Sites are non-contiguous. Appurtenant roadways are substandard; Wickley is between 15 feet and 20 feet in width, and Zirkel is only slightly wider. Both properties are characterized by drainage problems, with extensive flooding on Site 63, mostly due to a brook running through the Site which is tributary to the Ambrose Brook. In addition, flooding is caused by substantial congestion within the stream bed,

which would require downstream clearing to ameliorate.

The streams in the vicinity of both parcels, and the consequent flooding and drainage problems, will be affected by future Rutgers development on the Livingston campus, which is upstream of the Sites and which may have a substantial impact on the development of this property. The potential drainage difficulty coupled with the lack of recreational amenities servicing the citizenry in this area of the Township compel the conclusion that the most appropriate use for these parcels is as either as open space or active recreational development, rather than for residential use.

R. Site 49: Site 49 is an area consisting of 17 acres in the vicinity of Davidson Road and Metlars Lane, generally described as directly abutting Rutgers University campus. Substantial traffic problems will be produced by high-density residential development on this Site; indeed, it should be pointed out that this Site is neither contiguous or owned by the same person or persons, but features multiple ownership. The proposed extension of Hoes Lane to Metlars Lane will abut this property; while access to that proposed roadway can be had through this property, it would be required to be limited,

because the new Hoes Lane will not have island breaks, being a divided highway, which will limit access to the Site. It should also be pointed out that the configuration of this Site means that any access to Metlars Lane must be within 100 feet of a major intersection (Hoes Lane), which is not appropriate traffic engineering.

With respect to sanitary sewerage, the closest available trunk-line is located in Orris Avenue, which will require a connection approximately 450 feet in distance. That extension will be difficult to install because of the geology appurtenant to the Site; the trunk-line must be installed through heavy shale which will add substantially to the cost thereof.

With respect to storm drainage, the substantial offtrack improvements are needed because of insufficient capacity of storm drainage facilities serving this Site. A connection should be made with the brook running along Metlars Lane on the other side of Davidson Road, which is not a public roadway but part of the University road system (although the public presently has access to that roadway).

With respect to Davidson Road, it should be pointed out that Rutgers University has apparently elected to acquire

all property fronting on Davidson Road and eventually to limit access to the public. Davidson Road goes through a portion of the Busch Campus, and the University Administration Building, the Busch Students Center, and a group of dormitories and single and family student family units are located appurtenant to Davidson Road. It is likely, from recent acquisitions by Rutgers, that public access to Davidson Road will be limited at some point in the future.

S. Sites 51 and 52: These Sites are extremely small and are appurtenant to Site 60. As to these Sites, one will bear a jughandle for traffic from Hoes Lane to Morris Avenue, so that the southern and eastern portions of these Sites will be completely subsumed by that traffic development.

With respect to sanitary sewerage, any improvement of these Sites will require that the trunk-line on Old Hoes Lane and Mitchell Avenue be reached. This will require the acquisition of easements and extensive off-site construction, and the limited acreage involved on these two Sites strongly militates against high-density development considering the cost of the requisite sanitary sewer improvements. With respect to improvements, generally the same constraints apply.

A fifty-foot easement through the Sites is owned by the main connection cable for AT&T Long Lines, which will add a further constraint to the development because of the appurtenant limitations as to excavations in the area. The existence of the cable line, furthermore, entails a continuity of any utilities to be installed on the Site.

T. Site 53: This is a nine-acre site zoned for senior citizens housing. It is adjacent to the Senior Citizens Center, the Municipal Library, the Municipal Arboretum, and other municipal facilities. It is nearby banks, the Municipal Building, and other emergency services.

U. Site 54: Site 54 approximates six acres and is currently in private ownership as a functioning landscape nursery. It is appurtenant to River Road, which has been earlier described as an overburdened roadway. Although this may have been considered a vacant site based on an analysis of air photos, the use to which this Site is presently dedicated might cause the Site to appear vacant, but as that use continues to function, development of this property for high-density residential uses does not appear practical.

V. Site 57: This Site has been zoned for high-density residential development for its entire 40-acre area, the intent

being to coordinate this development with that in Highland Park, to which this area abuts River Road, which has been historically overburdened, and which requires considerable ingenuity in planning of appropriate ingress and egress to maximize safety and minimize full traffic impact.

W. Site 77: This is a six-acre parcel adjacent to the intersection of Metlars Lane and Suttons Lane. The same traffic constraints applicable to other Sites in the area of Metlars Lane and Suttons Lane and South Randolphville Road apply here. Because of the immediate proximity of this parcel to the intersection of South Randolphville Road and Metlars Lane, an intersection improved with traffic control devices, which has several islands and several modes of access from Metlars Lane, ingress and egress to this Site should be from Metlars Lane at a distance far enough from the intersection to avoid a potential traffic difficulty.

Offtract sewer drainage improvements will be required in order to connect with the closest sewer drainage system, across Metlars Lane from the subject Site.

X. Sites 75 and 76: Sites 75 and 76 are located along Hillside Avenue in the vicinity of River Road. It should

be noted that Hillside Avenue is proposed to be widened to a collector road with pavement at 46 feet and right-of-way at 66 feet in accordance with the master plan of the Township. Access to residential development along the Site should be limited to Hillside Avenue, because of the enormous traffic congestion along River Road. With respect to Site 75, particularly, there are substantial drainage constraints caused by a brook which is located at the bottom of the ravine on part of that Site. The brook is connected to a small pipe inadequate for extensively expanded usage which crosses River Road and will require substantial offtract drainage improvement to that parcel.

Y. Site 78: Site 78 is a three-acre tract located at the corner of School and Water Streets, in the southeasterly portion of the Township. While the traffic impact from this Site is small because of its limited area, it should be noted that the road network in this area is inadequate for any substantial high density development, consisting of roadways of narrow width. Of particular concern with respect to this Site is a very severe drainage problem; this Site accepts drainage and run-off from Stelton Road through a series of

antiquated ditches. Extensive off-site drainage work will be required between Stelton Road and this Site which will require condemnation and the obtaining of easements. As vacant land, the Site is inadequately drained presently, and any improvement should be subject to these considerations.

Z. Site 60: This Site is the most difficult Site to analyze, because it incorporates a number of separate and diverse land uses. I understand that this entire area was given one Site identification, because it was much too difficult to break down the Site into its component elements. Development of high density residential housing on this Site is impacted by a proposed expansion of Kroeger Park, a municipal recreational facility, and other municipal recreational sites throughout the parcel. Site 60 also includes substantial vacant lands owned by the Board of Education of the Township of Piscataway and presumably proposed for education use. No development of any magnitude on Site 60 can take place without substantial offtract road improvements; many of the roadways reflected by the sketch previously submitted in evidence in this proceeding are paper streets and have not been developed to any extent whatsoever. Such development must incorporate consideration of the need for substantial and extensive traffic control devices for the

entire area; this is particularly important because of the developing traffic along River Road, which as noted earlier, has been at capacity since the late 1960's. Consumption of the vacant land in this area will prevent the expansion of the Senior Citizen Center, the expansion of the Municipal Library, expansion of parking facilities to service these and other municipal functions, and other planned municipal purposes.

With respect to infra-structure, this section of town consists of older dwellings, and features few large subdivisions approved in recent years. The effect of this is that the sanitary sewer systems are limited in their capacity to absorb sewage from high density residential dwellings. Similarly, while in some areas storm drainage pipes have only recently been installed, the area as a whole lacks the infra-structure to support substantial numbers of high density dwellings.

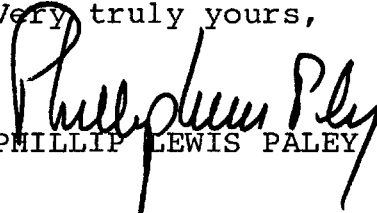
The above represents a summary of testimony to be offered by Henry A. Zanetti, as previously indicated; the within correspondence may be accepted as certified answers to Plaintiff's Interrogatories previously served upon this Defendant. Simultaneously, copies of the within correspondence

are being forwarded to all counsel of record, including Barbara Williams, Esq., Co-Counsel for the Plaintiff.

The Township of Piscataway respectfully reserves the right to supplement this report by additional information relating to any Sites to be considered appropriate for Mount Laurel development by Carla Lerman in any supplemental report, in accordance with our conversation of several days prior.

If you have any questions, please feel free to call the undersigned at your earliest convenience.

Very truly yours,



PHILLIP LEWIS PALEY

PLP:pmm

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