

UL v. Carbott, Piscataway 1/31 (1985)

Letter from Eastern Steel Barrel ~~dis~~ disagreeing
w/ Ms. Lorman's report

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FEB 1985

JUDGE SERPENTELLI'S CHAMBERS

January 31, 1985

Honorable Eugene D. Serpentelli
 Judge of the Superior Court
 Ocean County Court House
 CN-8293
 Toms River, New Jersey 08723

Urban League of Greater New Brunswick, et al.,
v. Mayor and Borough of Carteret, et al.

Dear Judge Serpentelli:

We represent Eastern Steel Barrel Corporation, the owner of a 23 acre industrial property located at 4100 New Brunswick Avenue, Piscataway. Eastern Steel Barrel has a large plant where steel barrels and plastic drums are manufactured. Eastern Steel Barrel recently completed an additional 3,000 square foot manufacturing addition and obtained approval for the construction of a 22,000 square foot warehouse addition.

I recite this background to help demonstrate the grave concern of Eastern Steel Barrel upon learning that the northerly ten acres of its property is said to be highly suitable for high density residential development. This is the conclusion, at least, of Carla L. Lerman in her January 18, 1985, report. It is clear that the ten acre tract which she refers to as "Site 4" is the northerly portion of Eastern Steel Barrel's property.

We disagree with Ms. Lerman's opinion from a zoning and land use planning point of view. More important, Eastern Steel Barrel has every intention of utilizing this northerly ten acres to accommodate its future expansion and growth. Indeed, the northerly ten acres presently provides Eastern's industrial facilities with sewer access and serves as a buffer zone between Eastern and the residential neighborhood to the north. Eastern Steel Barrel will also probably have to use a portion of this ten acre tract for parking in the

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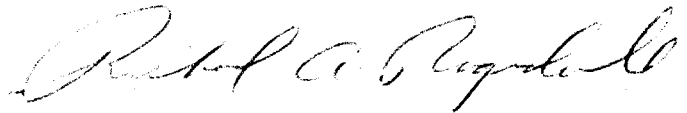
near future. Construction of additional manufacturing buildings on the northerly 10 acres is likely in the next five years.

Any classification of this ten acre tract which could possibly have the result of its being rezoned for residential use is of grave concern to Eastern Steel Barrel. Such rezoning could well render many aspects of Eastern's present operations nonconforming. It would have a devastating impact on the ability of Eastern to continue its operations on this property.

We would like the opportunity to present proofs and arguments to demonstrate that Eastern's property is not suitable for high density residential development, or to take other appropriate action to persuade the Township that Eastern Steel Barrel's property is simply not (voluntarily) available for residential development at any density.

I would appreciate the Court's guidance on the opportunities or rights that may be available to Eastern Steel Barrel to protect its interests in this matter.

Respectfully yours,



Richard A. Ragsdale

RAR:clz

cc: Ms. Carla L. Lerman
Phillip Lewis Paley, Esq.