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Cranbury

12-10-84

Cent of Sadlowski re: Cranbury  
should be a historic district

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Urban League of Greater New  
 Brunswick, et al.

v.

Borough of Carteret, et al.

SUPERIOR COURT  
 OF NEW JERSEY

MIDDLESEX COUNTY

DOCKET NO. C-4122-73

MOUNT LAUREL II

CIVIL ACTION  
 CERTIFICATION

Thomas J. Sadlowski, by way of certification states:

1. As past Chairman of the Middlesex County Historic Sites and Preservation Committee, I became involved in the question of the impact of the Mount Laurel litigation upon the historic Village of Cranbury. On or about August 20, 1984 I was informed by Mrs. Betty Wagner, President of the Cranbury Historical and Preservation Society, that a critical issue existed in Cranbury regarding the potential impact of rezoning under the Supreme Court decision known as Mount Laurel II. This question arose by virtue of the existence of certain large tracts of land directly contiguous to the historic district of Cranbury which tracts were either owned or under option by builders for construction of housing with a set aside for lower income families.

2. I conducted an independent investigation and determined that the Village of Cranbury in Cranbury Township was placed on the State Register of Historic Places in 1979 and on the National Register of Historic Places in 1980. Especially of note is the fact that the entire village is on both registers and the district does not consist of mere streets or blocks.

3. During the course of this investigation I met with numerous individuals and organizations involved in the area of historic preservation. An application to the National Trust for Historic Preservation was made in order to obtain a grant to fund an effort to preserve the historic Village of Cranbury. That grant has been approved by the National Trust and the individuals and organizations would now seek the Court's approval to intervene in the Urban League litigation as it affects the Village of Cranbury. The following parties have requested amicus status before the court.

- (1) Cranbury Historical and Preservation Society
- (2) Cranbury Landmarks Inc.
- (3) myself as an individual
- (4) Mr. Richard Walling

4. The Cranbury Historical and Preservation Society is a non-profit organization dedicated to the restoration and preservation of the historic buildings and sites in Cranbury Township, New Jersey.

5. Cranbury Landmarks Inc. is also a non-profit corporation dedicated to the preservation of the Cranbury historic district as well as the structures located in that area.

6. I personally have been involved in the field of historic preservation since 1976 when I was a founding member of Piscataway Historical and Heritage Society. From 1976 to 1984 I served as a commissioner of the Middlesex County Cultural and Heritage Commission and was Chairman of that commission from June 1982 until November 1984. I was also a founding member of two well known historic sites in the County, Ivy Hall and the Metlar House. I initiated a state pilot preservation project known as Middlesex County Coalition of Historic Organizations and Site Owners. I am currently a member of the East Brunswick Historical Society.

7. Mr. Richard Walling would also seek amicus status. He has been involved in this project since its inception. Mr. Walling's educational background is in the area of historic preservation. He has served as technical advisor to the East Brunswick Historic Preservation Society and is township historian. He has had extensive experience in the field of historic preservation both in Old Bridge and in East Brunswick and has organized museums and other exhibits involving local historical sites. He also participated in the Historic Preservation Survey conducted by the County and Municipal Government Study Commission.

8. The Village of Cranbury is unique in its historic values in that it is the only historic district of its type in Middlesex County. It is a treasure not only for the county but also for the entire state. Cranbury is one of the only national historic districts existing in a rural ambience and of the federalist era. The district has been classified as the third most viable in the state and is considered pristine in its quality. The condition of the buildings in the district are superb and the setting of the district in its environment gives it particular historical significance. Attached hereto is the National Register of Historic Places Inventory, setting forth the notable features of Cranbury Village. (See Exhibit A annexed hereto).

9. The organizations and individuals described above have determined that no effort should be spared to protect this unique and rare historic district from virtual destruction. Historic preservationists have significant documentation available which indicates that historic areas can be destroyed as a result of adjacent growth for several reasons. Infrastructure improvements can adversely affect the road networks and interfere with the validity of the district. Vibrational damage to historic structures by new construction and by increased traffic is also extremely problematic. In addition, due to increased commercial demands required by such developments, the central business district can be adversely affected. Direct impact upon the structures themselves can result by the expansion of the road networks and infrastructure and by loss of contiguous open space which is an integral element in the district's significance. These factors are brought forth in a letter from the Advisory Council on Historic Preservation which is annexed hereto as Exhibit B.

10. In reviewing the status of the legal proceedings in the Urban League case, we learned that the presentation to the court did not consider the negative impacts upon the historic district. The State Development Guide Plan was adopted prior to the official designation of Cranbury as a historic site and district and it therefore seemed imperative that the important issues involved in historic preservation be considered by the Court in connection with a Mount Laurel rezoning.

11. Towards that end we have spearheaded an effort to aid in the presentation to the court by experts in the field of historic preservation and urban design. A presentation has been made before the local planning board which is in the process of formulating a rezoning which will accommodate the Mount Laurel obligation. A panel of experts including a preservation attorney, Michael Pane, land use attorneys, a planner/architect, Albin Rothe and a certified preservationist, Sam Stokes, have been retained in order to make this presentation. The National Trust for Historic Preservation has provided a grant for this project.

12. Mr. Walling as an individual, Cranbury Historic and Preservation Society and Cranbury Landmarks, Inc., as well as myself seek to join in the remedy phase of the Urban League case in order to address the serious issues of the impact of a Mount Laurel rezoning upon the historic district. The scale of the proposed new housing, the architectural sensitivity, the buffering from the district, and the protection of the district itself are major focal points which we would seek to address in the litigation. It is crucial that we be permitted to address these concerns since

it is apparent at this time that no other state or private organization is engaged in protecting areas designated as historic sites in connection with implementation of the Mount Laurel II decision.

13. We are not opposed to the Mount Laurel II decision and do not seek to avoid the township's obligation as determined in the Urban League v. Carteret case. We do, however, feel that the historic and agricultural values so integrally involved in the implementation of a Mount Laurel rezoning deserve careful and sensitive attention with an eye towards preservation of one of the last historic districts of this type in the state. To that end, we have presented testimony to the township in the process of its rezoning and to the master, Mr. Philip Caton. We would request the opportunity to present our position regarding historic preservation to the court so that these important issues may be considered prior to a decision being rendered.

14. Our presentation would be coordinated through a single attorney of record and we would be willing to provide any additional information which the court may request on matters of special concern. This presentation would be coordinated so as not to cause any interference with the ongoing proceedings. We would hope to supplement the information supplied so that the Court may be able to consider all issues involved

15. It is respectfully requested that the Court permit us to intervene as amici in view of the irreversible effects which can result if the values of historic preservation are not incorporated in the Court's decision.

I certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false I am subject to punishment.

  
Thomas J. Sadlowski

Dated: December 10, 1984.