

Monroe 1986

9/19/86

Objections to Monroe's letter of intent

pgs = 3

no p.i.'s

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September 19, 1986

New Jersey Council on Affordable Housing
 375 West State Street
 CN 813
 Trenton, New Jersey 08625-0813

Re: Monroe Township

Dear Sirs:

We represent Lori Associates and Habd Associates, owners of real property in Monroe Township and plaintiffs in one of the Mount Laurel actions transferred to the Council. This letter is submitted pursuant to N.J.A.C. 5:91-3.1(c) to advise the Council that Lori Associates and Habd Associates are interested parties and that they object to the letter of intent filed by Monroe Township.

We have the following objections to the letter of intent:

1. The letter must contain a statement of "specific adjustments ... which the municipality intends to rely upon

to alter the initial calculation, and the general reasons therefor." N.J.A.C. 5:91-3.1(b)(2). Monroe merely states that "the adjustment factors for housing credit exist" and offers no explanation whatsoever. This is plainly inadequate. It is also incomprehensible, since our clients alone have sufficient developable land to meet Monroe's entire fair share.

2. The letter fails to contain a "proposed schedule for the submission of ... expert reports or studies," as required by N.J.A.C. 5:91-3.1(b)(3).

3. The letter fails to contain a "description of all efforts the municipality has undertaken to provide notice to interested parties and the public," as required by N.J.A.C. 5:91-3.1(b)(4).

4. The letter fails to contain "a summary of the Proposed Regional Contribution Agreement" or "a statement of reasons for the proposed Regional Contribution Agreement," as required by the Council's letter dated June 9, 1986.

If the letter of intent is to have any meaning, it is essential that the regulations concerning its contents be enforced. We therefore urge the Council to order Monroe Township to submit a proper and complete letter of intent.

Very truly yours,

AKM:cm

CLAPP & EISENBERG

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