

ML - Cranbury

30 - Oct - 84

- Response of Plaintiff Lawrence Zirinsky to Draft of "Suitability Evaluation Analysis for Low Cost Housing: Mount Laurel II"
- Response of UL Plaintiffs
- Response of Morris Brothers

Pgs. ~~11~~ ~~12~~ 17

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November 1, 1984

Township of Cranbury Planning Board
23-A North Main Street
Cranbury, New Jersey 08512

Re: Suitability Evaluation Analysis for
Low Cost Housing; Mount laurel II

Dear Members of the Coiranittee & Planning Board:

The following are the comments of the Morris Brothers regarding the analysis of the sites seeking rezoning in the above referenced matter.

Morris Brothers endorses the work and commends the planner for a thorough job. We are in agreement with most of the evaluation. We note only the following exceptions and clarifications:

It is noted on Page 6 that the Morris Brothers¹ site, Site 5, would require conversion of farm land for residential development. On Page 10 it is noted that development on Site 5 would destroy the natural setting of agricultural lands throughout the surrounding village.

While it is understood that the Township desires to maintain and preserve agricultural areas, Site 5 should not be considered such an area. Site 5 is not within the agricultural zone and in fact is currently zoned for planned development medium density residential use. In fact, the evaluation itself notes that Site 5 is not one of the sites where high density development would threaten adjacent agricultural lands, Page 16 of the report notes that Site 5 is not in a potential agricultural area and in fact is ideally located for a residential development. Therefore, the fact that Site 5 is presently in agriculture, does not mean it should be considered when the Board comes to consider preservation of the agricultural areas of the Township.

Page 10 notes that development of Site 5 would have a negative visual impact upon the nearby historic properties. Uncertain as to what "seriously negative visual impact" means the Morris Brothers can only state that the plan we presented and intend to develop will be visually attractive and, of course, subject to approval by the Planning Board.

Page 11 states that densities from Site 5 will overwhelm the scale and character of the existing village. Morris Brothers notes that its plan increases density as it goes south from the village with the greatest density at the southern end of the property, farthest from the village. We believe that we will provide development that is both "architecturally compatible" and would "mitigate visual impacts" as suggested on Page 11.

It is suggested on Page 64 that an awkward site design might result of the Morris Brothers' property. This is totally conjectural and certainly not to be inferred from the plan which the Morris Brothers presented to the Planning Board on the presentation day. Again, it is noted that the plan will be subject to approval of the Board and that awkward design can be eliminated so as to be compatible with the shape of the property and the surrounding uses.

Any concern about the development of the Morris Brothers' property due to its proximity to the village should also be weighed against those considerations as set forth in Page 3 of the report which notes that advantages of concentration of growth stresses "future development should occur adjacent to already developed areas". Site 5 is the logical extension for development of the village at its southern end.

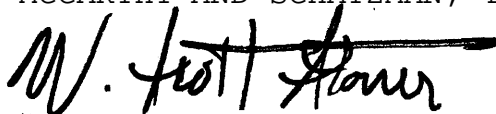
To the extent the analysis is concerned with traffic flow, Morris Brothers can only reiterate its position that its location would create a minimal amount of traffic flow through the village area. Its location of Route 130 would draw north-south travelers away from the village while the east-west arteries that would service Site 5 are south of the village and would create no flow through it. As noted on Page 41, "Site 5 can be serviced from many different directions" and so the disbursement of traffic from Site 5 would not overburden any particular roadway and have minimum effect on the traffic flow in the Township.

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In conclusion, Morris Brothers found the evaluation to be accurate and relevant to the important needs and concerns of the Township in its rezoning process.

Very truly yours,

MCCARTHY AND SCHATZMAN, P.A.

A handwritten signature in black ink, appearing to read "W. Scott Stoner". The signature is written in a cursive style with a horizontal line striking through the middle of the name.

By: W. Scott Stoner

WSS:kc

cc: Frank J. Rubin, Esquire
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~~Re: [unclear]~~

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November 1, 1984

Mr. Philip Caton
Clark & Caton
342 West State Street
Trenton, New Jersey

Dear Mr. .Caton:

The Urban League plaintiffs have reviewed the October 25, 1984 draft report entitled "Suitability Evaluation Analysis for Low Cost Housing: Mount Laurel II" prepared by Raymond, Parish, Pine & Weiner, Inc., for the Cranbury Township Committee and the Cranbury Planning Board. This letter conveys our preliminary response to that report for consideration at the November 1 township meeting. Please note" that we have previously requested an opportunity to have our housing consultant, Alan Mallach, heard on these matters at an appropriate point in your proceedings? we do not waive that request by submitting these comments in writing.

We have reviewed the draft report with Mr. Mallach in terms of its overall concept, and do not comment here on each site individually. Nor do we reargue the ten planning criteria used, except to note that the report's revival^of the 1981 proposed revision of the State Development Guide Plan is wholly inconsistent with Judge Serpente's rejection of that proposal at trial. Incorporation of the 1981 proposed revision into the final suitability criteria would be manifest error.

We believe that the draft report is inadequate in several other respects as well. The report is essentially conclusory, lacking any documentation specific, enough to demonstrate than any given site" is unsuitable. This is particularly true with respect to problems of historic preservation, traffic patterns, and environmental constraints. In general, the report supports the township's preference for the status quo in Cranbury - a preference that has, of course, already been mooted by the Court's decision in this case.

In addition, the draft report fails to consider the inter-

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relatedness of the available sites in terms of traffic, infrastructure, and aesthetic impacts. Cranbury's court-mandated fair share obligation of 816 units will obviously result in significant new construction. The proper question is not, therefore, whether traffic will be generated, or water and sewer connections needed, but how various combinations of sites can be selected to best handle the inevitable consequences of these impacts.

Lastly, and most significantly, the draft report fails to consider the special status of the builder's remedy plaintiffs. As you know, it is the Urban League's position that the three builders who participated fully in the trial - Mr. Garfield, Mr. Zirinsky, and the Cranbury Land Company - are entitled to site specific relief unless their properties fail to meet minimum planning thresholds. Even in its generalized terms, we do not understand the draft report to conclude that any of those three sites is sufficiently unsuitable to defeat a builder's remedy. This given, analysis of the remaining sites should be placed clearly in the context that their suitability is relevant only if an additional site is necessary to achieve the township's complete fair share or one of the builder's remedy sites is lost due to presently unforeseen circumstances. (Although the Urban League has argued that Toll Brothers is not entitled to a builder's remedy because of its non-participation in the trial, we recognize that this issue has not ~~yet~~ resolved by the Court and would suggest that a second analysis, assuming Toll Brothers' inclusion in the builder's remedy class would also be appropriate.)

As noted, we are available to amplify these comments at your request.

Very truly yours,

John M. Payne
Attorney for the Urban
League Plaintiffs

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Copy: all Cranbury counsel

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October 30, 1984

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Re: Response of Plaintiff Lawrence Zirinsky to Draft
of "Suitability Evaluation Analysis for Low Cost
Housing: Mount Laurel II" mmmmmm

Dear Mr. Caton:

We represent one of the four plaintiff-builders in the Mount Laurel II litigation involving Cranbury Township.* On July 27, 1984, the Honorable Eugene D. Serpentelli, issued an opinion determining that the fair share of low and moderate income housing for Cranbury Township would be 816 units. The Court took note of the stipulation by the Township that the present land use ordinance did not provide for a realistic opportunity for the satisfaction of that fair share of low income housing, and therefore directed Cranbury to revise its land use regulations within 90 days of that opinion, or by October 27th. Toward that end, Carla Lerman and Philip B. Caton were appointed by the Court as Masters to assist in the revision process. The Masters were also directed to report to the Court concerning the suitability of each plaintiff-builder's sites for Mount Laurel construction.

* A fifth builder, Morris Brothers, was allowed to intervene after the conclusion of the fair share phase of this litigation in June, 1984. However, the trial court provided that this plaintiff would be in a secondary position for a builder's remedy vis a vis the other four.

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On September 11th, Mr. Caton directed all of the plaintiff-builders to submit detailed proposals addressing a number of site suitability questions. On September 18th, we submitted a detailed proposal, along with two concept maps, for a 144-acre site abutting Main Street and the Village of Cranbury on the East, a number of improved lots running along Plainsboro Road on the South, the Toll Brothers property on the West and Cranbury Brook on the North. (Site 6) In addition, Mr. Zirinsky proposed a secondary site of 215 acres, just west of the Village, below Plainsboro Road, directly South of Site 6 (Site 8). On September 25th, Mr. Zirinsky and other plaintiff-builders presented their plans to a joint public meeting of the Cranbury Township Council and Planning Board.

At* an October 25th meeting of the Township Council and Planning Board, the Township Planners, Raymond, Parrish, Pine and Weiner, (RPPW) presented a "Suitability Evaluation Analysis for Low Cost Housing: Mount Laurel II" (hereafter referred to as the "Report"). All of the plaintiffs in attendance were advised that they had four working days in which to submit a response to this 65 page document which had never been revealed to the public prior to that date.

1. SUMMARY

It is clear that the Report is intended to somehow justify the earlier policy judgments made by Cranbury that no development occur West of the Village of Cranbury, even though three of the four plaintiff-builders have sites in that area of the Township. The document relies upon inaccurate information concerning the State Development Guide Plan (SDGP); inaccurately portrays the County Master Plan; makes assumptions about traffic without any effort at a professional traffic study? is contradictory in recommending that Mt. Laurel sites be accessible to public services, shopping, etc., but at the same time recommending that no intensive development occur at sites adjacent to the only location that provides such services, the Village of Cranbury; and in acknowledging that the major growth for the entire region is occurring in the Route 1 corridor West of Cranbury but that any growth occur in Cranbury on the very opposite side of the Township, or in the section East of Route 130.

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Unfortunately, the Report does not take into consideration the detailed concept plans presented not only by Mr. Zirinsky but by other plaintiff-builders. For example, the Report is quite critical of the 144-acre site proposed by our client, primarily because of its alleged adverse impact upon the Village, particularly in the area of traffic generation and disturbance with the architecture and character of the Village. No acknowledgment is made of our client's plan to construct a road extending northeast from Plainsboro Road to Main Street, to circumvent the Village and alleviate traffic generated both on and off the site. Nor does the Report acknowledge the commitment by Mr. Zirinsky to construct appropriate buffering and to arrange the site so, that lower density housing is located closer to the Village while the higher density is some distance from that same area. Instead, the document is largely; a recitation of testimony already presented by three witnesses' for Cranbury Township in proceedings this past Spring before Judge Serpentelli: George Raymond, a principal with RPPW; Thomas March, a former associate with RPPW? and John Sully, a planner with the Middlesex County Planning Board. These witnesses all testified in essence, that no low or moderate income housing should be constructed on the western part of Cranbury, since it would be at variance with the SDGP, and the attempts to preserve both the Village and agriculture. Suffice it to say, none of those arguments were accepted by Judge Serpentelli in finding Cranbury's ordinance non-complying and in issuing his directive that the Township consider and adopt a complying ordinance.

2. STATE DEVELOPMENT GUIDE PLAN (Pages 1-7 of Report)

Two critical errors are made in the Report concerning the SDGP. First, as Cranbury did in formulating its 1982 Land Use Plan (Exh. DC-14)*, the document utilizes a "1981 State Development Guide Plan Map", as if that "map" had some official status (See Fig. 2 of Report). In doing so, the document ignores the decision of Judge Serpentelli in this case (See Court Opinion, pp.2 and 3):

* All exhibit designations are those of the trial court in the Cranbury litigation.

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...As should be evident from the fair share discussion above, I have rejected Cranbury's challenge to the State Development Guide Plan (hereinafter SDGP). Essentially, Cranbury argued that since the 1980 version of the SDGP, the Department of Community Affairs (hereinafter DCA) amended the concept maps, thereby characterizing less of the municipality as growth area. A reduction in growth area would lower Cranbury's obligation somewhat and might impact on the granting of a builder's remedy.

."* Cranbury's argument fails for two reasons. First, the testimony at trial did not demonstrate that the SDGP was ever formally amended. Apparently, the DCA considered many possible changes to the May, 1980 SDGP and summarized their comments in a document dated January, 1981. (J-8 in evidence). However, the process never progressed beyond mere general discussion and, in fact, Mr. Ginman did not recall any specific discussion of a change affecting Cranbury with the Cabinet Committee. Second, and more importantly, our Supreme Court has adopted the May, 1980 SDGP - not the subsequent alleged amendments. Indeed, the Supreme Court went as far as giving the 1980 SDGP evidential value. (Mount Laurel II at 246-471) Any informality in adoption of the 1980 edition of the SDGP is overcome by the Supreme Court's endorsement of it as a means of insuring that lower income housing would be built where it should be built. (Mount Laurel II at 225).

Second, the SDGP lines that are set forth in the document concerning both the 1980 and 1981 maps, are inaccurate. (Figures 1 and 2 of Report) On May 15, 1984, George Raymond presented these very graphs and upon cross-examination, had to concede that the lines had to be moved westward (See DC-4).

STERNS, HERBERT a WEINROTH

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Consequently, the 1980 SDGP line is entirely to the west of Site 6 and is on the western fringe of Site 8. (See Exh. P-1) Therefore, pages 6 and 7 of the Report should be amended to state that the entire land area within Site 6 is located within the SDGP "growth area".

3. HISTORIC PRESERVATION (Pages 8-11 of Report)

As noted in the submission to the Master on September 18th, Mr. Zirinsky has acquired options on 1,771 acres in the western portion of Cranbury Township. Recognizing that there are three other plaintiff-builders, it would be impossible to accommodate the 816 low and moderate income units among all of the land of these plaintiffs, our client agreed not to seek a builder's-remedy on most of his options (3 land, but instead to ask for a remedy on the 144-acre site, located on Main Street and directly abutting the northwest portion of the Village of Cranbury. (Site 6) In doing so, our client recognized a basic axiom of sound land use plan, that any high density housing should be accessible to existing and proposed public and private facilities, such as shopping, post office, health care facilities, schools, recreation and play fields, as well as places of worship, the library, fire and rescue and police protection. The only area where these facilities are located within the entire borders of Cranbury Township is within the Village of Cranbury. Hence, our client has chosen a site directly accessible to all of those facilities. As the Report itself acknowledges at Page 39, the "Benefits associated with locating next to the Village would be good fire, police and rescue squad coverage and the ability for children to walk to the elementary school (Grades K-8) located on Main Street."*

Yet, the report recommends against high density housing near the Village because it would somehow adversely affect its "historic preservation". First, it is evident that RPPW never even attempted to review the concept plan submitted by our client, for if they did they would note that we have proposed

* In addition, Mr. Zirinsky has proposed secondary priority consideration for Site 8, also in the Village area.

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construction of a road extending northeast from Plainsboro Road to Main Street, completely bypassing the Village and actually resulting in a reduction of traffic within the northern portion of the Village area. That plan also called for buffering between the on-site development at Site 6 and the present properties in the Village. Finally, the proposal provides for lower densities in the eastern portion of Site 6, so as to be consistent with the current structures in the Village. As such, the proposal for the development of Site 6 conforms with the acknowledgement in the Report itself that such construction can be allowed where "designing architecturally compatible developments and/or buffering them from the Village would mitigate visual impacts." (Report, p.11)

The argument about "historic preservation" is not only repugnant to generally accepted land use principles that high density planning occur near available community facilities, but it is an argument that has no legal basis whatsoever. The historic designation of the Village has its genesis in the National Historic Preservation Act of 1966, which was intended to prevent the use of public funds, principally those involving federal expenditures, for public undertakings which would destroy historic areas or sites. P.L. 89-665, STAT. 915. The federal regulations implementing that Act make clear that it was intended only to deal with projects involving the expenditure of federal funds. See 36 C.F.R. 800.2. In 1979, the New Jersey Department of Environmental Protection adopted regulations to implement the National Historic Preservation Act on a state level. In those regulations, it was made clear that an historic designation would not affect local zoning decisions. Accordingly, in defining an "undertaking", N.J.A.C. 7:41.1 provided as follows.

"Undertaking means an action initiated by the public sector --• State, county ^r municipality - or any agency or instrumentality thereof. Acquisition or sale by the public sector will be considered an undertaking. The following examples of actions that will not be considered for the purpose of these regulations;

1. Changes in local zoning ordinances;

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2. Issuance of building or demolition permits to private individuals or corporations;

3. Granting of zoning variances to private individuals corporation; and

4. Ordinary and general maintenance, (emphasis supplied)

Further, although the Municipal Land Use Law defines a "historic site" (N.J.S.A. 40:55D-4), nowhere in that statute is a municipality authorized to prevent the development of property merely because it is in or adjacent to an "historic site". In fact, our Legislature has made it clear that if a municipality intends to prevent any such construction, it can do so only by providing adequate compensation to the owners of such property. See N.J.S.A. 13:8B-1, et seq.

The irony of the Report is that it blindly rejects any Mount Laurel housing near the Village without any attempt to understand our client's proposal and in total contradiction to its subsequent acknowledgment that accessibility to community facilities would be a critical factor in locating such housing.

4. FARMLAND PRESERVATION (Pages 12-17 of Report)

The report discourages any high densities throughout the entire western portion of the Township, consisting of over half of Cranbury's total land area (4,490 of 8,460 acres). It does so based upon an inaccurate interpretation of the SDGP, and the trial court's decision concerning that document; and in contradiction with its own acknowledgment that the primary growth pressures on Cranbury Township will be from the west. Indeed, the Report itself acknowledges that in West Windsor and Plainsboro Townships alone, located directly to the west of Cranbury, there are either plans or actual construction underway to build over 13 million square feet of industrial or commercial space. (Report, Page 54) The report concedes, as it must, that the "primary office and research node will be along the Route 1 corridor from South Brunswick to West Windsor Township including Plainsboro". (Report, Page 47). In addition, the former Cranbury Planner, Tom March, acknowledged in his testimony at

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trial that the Linpro Development, in Plainsboro Township, directly adjacent to the western border of Cranbury, will contain 6,200 units at net densities reaching 16 units per acre. Cranbury would argue that it should preserve agriculture at a density of one unit for every six acres within a stone's throw of Plainsboro Township with net densities almost 100 times greater! Cranbury's approach to farmland preservation is totally illogical. It would sacrifice the prime agricultural lands east of Route 130 for high density development, so as to accommodate sites 1 through 3, thereby requiring residents living in these areas to travel through Cranbury Township, including the Village, to commute to the Route 1 Corridor to the west. It is submitted that what is far more logical is to allow for high density development west of the Cranbury, thereby facilitating direct commutation*to the Route 1 Corridor, without passing through that same Village.

In point of fact, the document appears to ignore the 1982 Land Use Plan issued by the same planning firm, which noted that the percentage of land devoted to agricultural east of the Village is approximately the same as that west of the Village (approximately 62%), while the eastern portion of the Township has the same percentage of high quality agricultural soil (see Exhibit DC-14, pages II-XIV, II-XVIII).

It appears more logical that the farmland east of the Village lends itself to preservation as opposed to the lands to the west, as the former is separated from the Route 1 growth area by both the Village and Route 130 and is buffered on the east by the New Jersey Turnpike and a large wooded area to the south. In addition, as the Report acknowledges, Route 92 will probably be located in the western portion of the Township, accentuating the growth pressures in that area.

5. MIDDLESEX COUNTY LAND USE PLAN (Pages 18-22 of Report)

As with so many other portions of the report. Page 22 contains a glaring inconsistency. There it is stated that "a portion of Sites 6 and 8, (owned by our client)... "has been shown as 'residential' on the County Land Use Plan", but then it states that Cranbury's land use plan, which would designate that entire area as agricultural, "is basically consistent with the County's plan" with respect to these very sites.

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It should be noted that the Middlesex County Land Use Plan and Map was produced at the trial before Judge Serpentelli during the testimony of County Planner John Sully. Contrary to the Report these County documents designate all of Site 6 as "residential" and virtually all of Site 8 in that same classification. On the other hand, contrary to the Report's statement, these same county plans call for the preservation of agricultural in the east, encompassing Sites 1-3, which the Report now designates for high density zoning (See Exhibit DC-12; Exhibits P2-3 and 4, and testimony of John Sully on May 24, 1984).

6. ADJACENT LAND USE PATTERNS (Pages 31-38 of Report)

At Pages 31 and 32, the Report exposes its clear bias against development on the western portion of the Township, particularly near the Village, irrespective of sound land use considerations. In speaking about Sites 1 and 3, which RPPW generally favors, the planning firm acknowledges that the presence of the Turnpike service area and the Turnpike makes development on these 3 sites "generally inconsistent with sound residential development". However, since RPPW favors development east of Route 130, it brushes aside this consideration by stating that, "However, buffers, e.g., open space, recreational facilities and/or commercial/industrial land uses, could be placed between the service area and homes to mitigate the impact." In other words, the Report would have the Master accept the premise that high density residential development should not be allowed adjacent to the Village, the sole source of community support facilities and existing intensive residential uses, even with buffering (as our client proposes on Site 6) but at the same time allow the same type of development adjacent to New Jersey's largest super highway, isolated from these same community facilities? Why does buffering mitigate the problem in one case, but not in the other? The answer appears to be the adamant position of the Township to oppose any sensible development in the Village area, irrespective of sound land use considerations.

Page 31 also contains another inconsistency. It states that Sites 1-3 are "near" portions of Monroe Township, which are "primarily in a light impact industrial zone." In point of fact, these sites are at least a half-mile from that portion of Monroe

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and no closer than Site 6 is to same area. In addition, Site 3 is even more remote, located at least three-quarters of a mile from the Monroe light industrial zone.

7. PROXIMITY TO COMMUNITY FACILITIES AND SERVICES

(Page 39-42 of Report)

As noted, the Report begrudgingly acknowledges that Sites 6 and 8 have ready access to the Village and commercial development in Plainsboro and that the "benefits associated with locating next to the Village would be good fire, police and rescue squad coverage, and the ability for children to walk to elementary schools (Grades K-8) located on Main Street." (Report pp.39,41) We agree, and that is why our client selected Site 6 for Mount "Laurel" housing from among the 1,771 acres optioned by him. However, we disagree with the Report's apparent recommendation that both this site and site; 8 should not be granted priority because of their alleged adverse impact on agriculture and Village preservation. Indeed, RPPW recommends that the 61 acre parcel comprising the eastern portion of Site 6, remain in agriculture, even though several hundred feet of that tract abuts Main Street; while at the same time recommending that high density development occur on Site 2, which is almost a quarter of a mile to the east of the Village, the sole location of community support facilities.

8. ACCESSIBILITY (Pages 33-55 of Report)

In addressing traffic considerations, the Report contains a basic contradiction. It properly acknowledges that the primary office and research node will be along the Route 1 corridor west of Cranbury (Page 47) and notes that there will be over 13,000,000 square feet of office space in West Windsor and Plainsboro Townships alone to the west of Cranbury. (Page 54) However, the Report then states that construction west of the Village would have an adverse traffic impact, while construction east of the Village would not, on the supposition that the residents of the new developments in the East (Sites 1-3) would somehow avoid the Village by travelling circuitous routes north to Dey Road or south to Old Trenton Road. This supposition is made without any traffic studies and at variance with common logic. As noted, common sense would dictate that if there is to be high density development in Cranbury Township, it should be

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located west not east of the Village, thereby eliminating commutation patterns through the Village area.

Second, this portion of the report does not take into consideration the offer by our client to have a road constructed from Plainsboro Road to Main Street, completely circumventing the existing Village area, and we argue actually improving existing traffic flow through that area,

9. ENVIRONMENTAL SUITABILITY AND SITE ASSEMBLAGE, SIZE & SHAPE
(Pages 56-65 of Report)

These criteria do not permit the influence of subjective policy determinations but deal with objective considerations which cannot be skewed by Cranbury's planners. Therefore, it is not surprising that the Report concedes that the sites proposed by our client, are most suitable for development:

A review of soil characteristics on each site and knowledge of floodplains, heavily wooded areas, and good topographic features reveals that Sites 6 and 8 appear to be the best suited for intense residential development with low/moderate income housing. Both sites are basically flat with gentle slopes toward stream corridors. Nearly 80% of sites 6 and 8 contain Sassafras soils (the best soil for residential development) which have slight limitations for construction of foundations and moderate limitations for construction of roadways. (Page 58)

...

...Site 6 is bounded by Cedar Brook to the north and primarily contains Sassafras soils which are readily developable. (Page 59)

...

...Site 6 appears to have a size and shape that permits desirable residential layout. Site 6 has two separate lots and two different

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property owners. It has been proposed to build 922 townhouses and 230 garden apartment condominiums at 8 dwelling units/acre. The plaintiff for Site 8 has not asked for specific relief at this time. However, the site does have a good size and shape for residential development. It has three separate lots and three different property owners, but has one large parcel totalling 130 acres. If the site were developed at 8 dwelling unit acre, it would generate 1,726 unites.... (Pages 62 and 63)

10. CONCLUSION

When the plaintiffs sites are, examined from an objective land use standpoint, and unfounded policy biases are rejected, then each of the sites located west of the Village of Cranbury are most suitable for high density development. In addition, the plaintiff Zirinsky submits that of all of the sites under consideration, Site 6 is the most ideal location for Mount Laurel II housing.

Respectfully submitted,

STERNS, HERBERT & WEINROTH, P.A.
Attorneys for Lawrence Zirinsky

By: 

Michael J. Herbert

cc: Raymond, Pine, Parish & Weiner
Township Council and Planning Board of Cranbury
All Counsel