

~~Country~~ Countryside properties v Borough of Ringwood

05/22/85

Ringwood  
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Aff. in support of m. for leave to  
appear amicus curiae

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ATTORNEYS FOR

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
PASSAIC COUNTY

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*Plaintiff*  
COUNTRYSIDE PROPERTIES, INC.  
et als.

vs.

*Defendant*  
MAYOR & COUNCIL OF THE BOROUGH  
OF RINGWOOD, et als.

*Docket No. L 42095-81*

*CIVIL ACTION*  
Affidavit In Support of  
Motion For Leave to  
Appear Amicus Curiae

GLORIA B. CHERRY, of full age, being duly sworn, deposes  
and says;

1." I am an attorney for the movant in the above entitled  
action.

2. I am familiar with the League of Women Voters by virtue  
of approximately twenty years of membership in the organiza-  
tion; through my former participation on the Board of Directors

of the League of Women Voters of New Jersey; through my participation as Legal Advisor of the League of Women Voters of New Jersey since approximately 1978 and as an attorney representing the League in the instant litigation.

3. The League of Women Voters of Ringwood (LWV/R) is a member group of the League of Women Voters of the United States (LWV/US) and has been active in national, state and local community affairs since 1975. The foremost goal of the LWV is the promulgation of public participation in government based on a free flow of information. As part of this grass roots organization, the members study issues of national, state and local importance, formulate positions and take action, including litigation, where it is considered necessary. The litigation between the Borough of Ringwood vs. Countryside Properties, et al, directly affects many LWV positions in general and LWV/R members specifically as residents of Ringwood. The action the LWV/R is taking is in full accordance with the principles and guidelines of the national and state LWV.

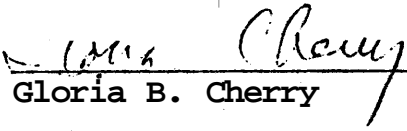
4. The (LOT/US) and LWV/NJ are committed to the view that housing and land use policies must foster an optimum balance between human needs and environmental quality and that there can be no ultimate conflict between policies that support equal rights for all and a physical environment beneficial to human life.

5. On January 14, 1985 a special meeting of the LWV/R was held to discuss a reconciliation of the League of Women Voter's position on Mount Laurel and development as it relates to Ringwood. Information specific to Ringwood was presented at this special meeting. In addition, information presented at a public forum on land use and zoning in Ringwood sponsored by the League on December 6, 1984 was considered. The membership concluded that it supported Mt. Laurel and the implementation of a program to assist families in substandard housing as well as providing affordable housing for overcrowded families, but any program implemented should provide assurance that the families discovered through the 1980 census shall be assisted and not that Ringwood will later find that the same households will remain unassisted into the future. There was serious reservation that new construction alone would accomplish this. Additionally there was concern that the introduction of high density development should not set precedents of development of especially environmentally sensitive land or that such development would induce substantial future growth which would be contrary to Ringwood's conservation status.

6. Because the issues involved in settlement of Ringwood's Mt. Laurel suit will have significance for other communities where implementation of the Mt. Laurel decision comes

into conflict with environmentally sensitive areas, the LWV/R met with the LWV/NJ State Board on March 13, 1985 to discuss possible action in this matter. The LWV/NJ State Board endorsed the LWV/R position and authorized the LWV/NJ Legal Advisor to represent the LWV/R in litigation.

7. It is respectfully requested that LWV/R be permitted to file a brief as amicus curiae and participate in oral argument before the Court with respect to the method of providing for the housing needs of the indigenous poor in Ringwood.

  
Gloria B. Cherry

Sworn to and subscribed  
before me this \*?\*' day  
of \*?>tAt,i , 1985.



DOROTHY L. WINTERBOTTOM  
NOTARY PUBLIC OF HZ@ JEGSE.  
My Commission expires October 18, 1986