

RULS - AD - 1984 - 560

12/5/84

Memorandum re: Redminster Township Compliance  
Package: Clarification of Site Nomenclature

- Cover letter to Judge

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December 5, 1984

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The Honorable Eugene D. Serpentelli, J.S.C.  
Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey 08753


Allan Deane v. Township of Bedminster

My dear Judge Serpentelli:

Pursuant to your request I have prepared the attached memorandum for the purpose of relating my discussion of the proposed compliance package sites in previous reports to the revised site nomenclature used by the Township in the submission which is currently under review by the Court.

I hope this will help clarify this matter.

Respectfully yours,

  
George M. Raymond, AICP, AIA  
Chairman

GMR:kfv

cc: Alfred Ferguson, Esq.  
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Henry A. Hill Esq.  
Kenneth J. Meiser, Esq.

## Memorandum

December 5, 1984

TO: Hon. Eugene D. Serpentelli, J.S.C.  
FROM: George M. Raymond  
SUBJECT: Bedminster Township Compliance Package: Clarification  
of Site Nomenclature

During the evolution of Bedminster Township's compliance package in the Allan Deane case, the various sites which are proposed to be used for the construction of low- and moderate-income housing have borne different designations. The purpose of this memorandum is to relate my earlier comments (Reports dated January 10, 1984 and April 11, 1984, which used the site nomenclature then used by the Township) to the sites in the Township's final offer (contained in the letter from Richard Coppola to the Court dated September 5, 1984). The sites are listed below using their final designation.

Site A (previously designated as Site K) consists of Hills Development Company's PUD development. Its total capacity was established at 1,287 units (p. 39 of

1/10/84 report) with an affordable housing set-aside of 260 units (p. 49 of 1/10/84 report and p. 6 of 4/11/84 report). The site was deemed "available for early development" (p. 49 of 1/10/84 report) and "immediately sewerable within the existing capacity of the Environmental Disposal Corporation's (EDC) sewage treatment plant" (p. 8 of 4/11/84 report). (Please see discussion of Site C, below, for a correction regarding the description of Site K in the January and April reports. This correction does not affect either the suitability or the capacity of Site A).

Site B was offered subsequent to 4/11/84. I never specifically commented on it in writing except to find (in my letter to the Court dated 7/26/84) that it constituted a satisfactory component of the group of sites included in the proposed agreement (dated 7/6/84) between the Public Advocate, acting on behalf of the Ceiswick plaintiffs, and Bedminster Township. This site has a capacity of 928 units with a 180-unit affordable housing component.

Site C had been erroneously included with Site K in the Township's early presentations to the Court and is therefore not identified separately in either the 1/10/84 or 4/11/84 reports. This 17.18-acre site is

owned separately from the Hills PUD parcel and its capacity of 172 dwelling units with a 34-unit Mount Laurel set-aside is currently offered as additional to the 1,287-unit (260 affordable unit) capacity of the Hills PUD (Site A, above). The characterizations used in the 1/10/84 and 4/11/84 reports with regard to Site K apply to this site as well except that its sewerability is contingent upon the expansion of the EDC plant.

Site D (previously designated as Site L) was given a capacity of 177 units (p. 39 of 1/10/84 report) of which 35 would be affordable (pp. 50-51 of 1/10/84 report). It was characterized as "available for early development" (p. 49 of 1/10/84 report) and as being one of a group of sites (Group II) the development of which would be contingent upon the expansion of the EDC plant to serve all of its franchise area (p. 14 of 4/11/84 report). This site in its entirety was also found suitable for an alternate use as a 100% low- and moderate-income senior citizen development of as many as 177 units (p. 6 of 4/11/84 report).

Site E (previously designated as Site J) was found to have a total capacity of 599 units with an affordable set-aside of 171 units (p. 50 of 1/10/84 report). It