

FRIEND & WENZEL

ATTORNEYS AT LAW

GERALD G. FRIEND
jerry@friendwenzel.com

JOSEPH M. WENZEL
joe@friendwenzel.com

975 CLIFTON AVENUE
CLIFTON, N. J. 07013
TEL: (973) 779-4290
FAX: (973) 779-8424
www.friendwenzel.com

RICHARD W. HAWKINS
richard@friendwenzel.com

CAROLA B. MARQUEZ
carola@friendwenzel.com

KURT S. HILBERTH
Of Counsel (NJ & FL)

February 6, 2025

VIA HAND DELIVERY

Board Secretary
Division of Planning & Development
Township of West Orange
66 Main Street
West Orange NJ 07052

Re: Montclair Stables, LLC - Zoning / Land Use matter
12-22 Woodland Avenue
Block 152.02, Lots 176, 179 & 186

Dear Secretary:

Enclosed herewith please find the following documents having been collated into five (5) packets for filing:

- 1) Township of West Orange Development Application dated January 15, 2025
- 2) Boundary & Topographic Survey, 12 Woodland, Lot 186, Block 152.02, Township of West Orange, Essex County, New Jersey, dated August 2, 2023, prepared by Wayne Ingram, PLS, French & Parrello, consisting of two (2) sheets
- 3) Proposed Site Improvements, Montclair Stables, Tax Lots 176, 179 & 186, Block 152.02, Tax Map Sheet 77, Township of West Orange, Essex County, New Jersey, dated January 10, 2025, prepared by Robert M. Cunningham, Professional Engineer, consisting of ten (10) sheets
- 4) Proposed Cut & Fill Calculation, Montclair Stables, Tax Lots 176, 179 & 186, Block 152.02, Tax Map Sheet 77, Township of West Orange, Essex County, New Jersey, dated January 10, 2025, prepared by Robert M. Cunningham, Professional Engineer, consisting of five (5) sheets

Knowledge, Experience & Professionalism Since 1924

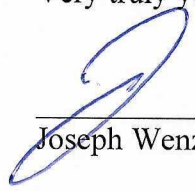
- 5) Drainage Report for Proposed Site Improvements, Montclair Stables, Tax Lots 176, 179 & 186, Block 152.02, Tax Map Sheet 77, Township of West Orange, Essex County, New Jersey, dated January 10, 2025, prepared by Robert M. Cunningham, Professional Engineer, with Plan Maps consisting of two (2) sheets
- 6) Tree Removal, Replacement and Landscaping Plans, Montclair Stables, Block 152.02, Lots 176, 179 & 186, 12-22 Woodland Avenue, West Orange, NJ, dated December 27, 2024, prepared by John A. Olivo, Landscape Architect, Bosenberg, consisting of three (3) sheets
- 7) Planning Report (including request for waiver of traffic report) prepared by Matthew Seckler, PP, of Stonefield dated February 5, 2025 consisting of four (4) pages
- 8) One (1) flash drive containing all of the above referenced documents
- 9) Check (#6225) made payable to Township of West Orange in the amount of **\$2,031.25** for the filing fee. This is in accordance with West Orange Municipal Code §25-56 (Preliminary Site Plan Application fee - \$450 plus \$225 for over 3 acre lot - \$675; Final Site Plan Application fee - \$506.25 (75% of the Preliminary Fee); Use Variance request - \$500; and Bulk Variance request - \$350)
- 10) Check (#6226) made payable to the Township of West Orange in the amount of \$3,500 for Escrow fees under West Orange Municipal Code §25-55.1(2).

As the use (horse riding and training facility) is not expressly permitted in the zone and is thereby a pre-existing nonconforming use, it is our position that this application should be referred to the Zoning Board of Adjustment for approval.

Please contact the undersigned once this application is deemed administratively complete and set for a board hearing date.

Thank you for your time and attention

Very truly yours,



Joseph Wenzel, Esq.

Enc.