

CA - Plainsboro

4-March-75

Interrogatories demanded of  
Plainsboro by the Plaintiffs.

pgs = 16

CA0018329

JOSEPH L. STONAKER  
COUNSELLOR AT LAW  
246 NASSAU STREET  
PRINCETON, NEW JERSEY 08540  
TELEPHONE: 921-2155  
AREA CODE 609

March 4, 1975

Daniel A. Searing, Esquire  
National Committee Against Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005

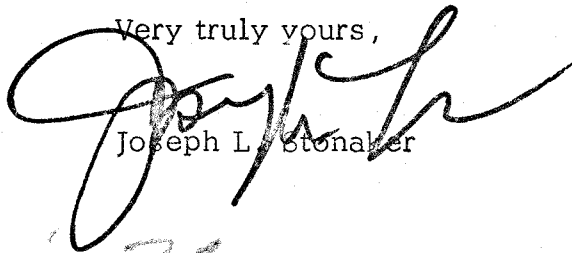
RE: Urban League of Greater New Brunswick et al. vs.  
Mayor and Council of the Borough of Carteret, et al.

Dear Mr. Searing:

Enclosed please find two copies of Zoning Map for  
Plainsboro Township. Inadvertently these were omitted from  
the interrogatory enclosures forwarded to you on February 28, 1975.

Further, with regard to interrogatory eighteen, please  
be advised that Princeton University - Forrestal Campus was opened  
in 1952. It presently has 800 employees.

Very truly yours,



Joseph L. Stonaker

JLS:ns

Enclosures

*See zoning files*

cc: Baumgart & Ben-Asher, Esquires

RECEIVED

MAR - 3 1975

JOSEPH L. STONAKER  
COUNSELLOR AT LAW  
245 NASSAU STREET  
PRINCETON, NEW JERSEY 08540  
TELEPHONE: 921-2155  
AREA CODE 609

February 28, 1975

Daniel A. Searing, Esquire  
National Committee Against Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005

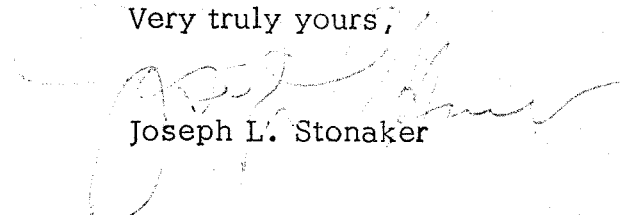
RE: Urban League of Greater New Brunswick, et al. vs.  
Mayor and Council of the Borough of Carteret, et al.

Dear Mr. Searing:

I am enclosing herewith original and one copy of answers  
to interrogatories of Defendant, Plainsboro Township.

Thank you for your cooperation in this matter.

Very truly yours,

  
Joseph L. Stonaker

JLS:ns  
Enclosures  
cc: Baumgart & Ben-Asher, Esquires  
cc: All Defense Attorneys

3-3-73

BAUMGART & BEN-ASHER  
Attorneys for Plaintiffs  
134 Evergreen Place  
East Orange, New Jersey 07018  
201-677-1400

MARTIN E. SLOANE  
DANIEL A. SEARING  
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Of Counsel  
National Committee Against  
Discrimination in Housing, Inc.  
1425 H Street, N.W.  
Washington, D.C. 20005  
202-783-8150

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION - MIDDLESEX COUNTY  
DOCKET No. C-4122-73

URBAN LEAGUE OF GREATER  
NEW BRUNSWICK, et al.

Plaintiffs,

v.

THE MAYOR AND COUNCIL OF  
THE BOROUGH OF CARTERET,  
et al.

Defendants

Civil Action  
INTERROGATORIES

To:

JOSEPH L. STONAKER, Esq.  
245 Nassau Street  
Princeton, New Jersey 08540

DEMAND is hereby made of the defendant TOWNSHIP COMMIT-  
TEE OF THE TOWNSHIP OF PLAINSBORO for Certified  
Answers to the following interrogatories within the time  
prescribed by the Rules of this Court.

1. Please provide the most current statistics  
available on the population of the municipality, by  
income level and race (categorized as white, black,

spanish-speaking, other), citing source.

Source: 1970 Census of Population, State of New Jersey, Department of Labor and Industry, Division of Planning and Research

Population:	<u>Total</u>	<u>White</u>	<u>Negro</u>	<u>Other</u>
	1,648	1,553	64	31

Family Income by per cent: 0 - 2,999: 6.2%; 2,999 - 3,999: 1%; (continued on Rider)

2. Provide for each public school within the municipality, the number of pupils enrolled, with sub-totals for whites, blacks, spanish-speaking and other, giving school name, location, grades served and area.

West Windsor-Plainsboro Regional School District: Plainsboro School  
Princeton Road, Plainsboro: Total enrollment - 255

<u>Grade</u>	<u>White</u>	<u>Negro</u>	<u>Spanish</u>	<u>Other</u>
Kindergarten	50	3	0	1
1st Grade	47	1	0	2
2nd Grade	58	3	0	4
3rd Grade	61	1	0	2
4th Grade	<u>21</u>	<u>1</u>	<u>0</u>	<u>0</u>
Total	237	9	0	9

3. Provide the number of dwellings presently within the municipality in each of the following value categories, as determined from the property tax rolls.

(a) Single family homes under \$15,000

8

(b) \$15,000 to \$25,000

77

(c) \$25,000 to \$35,000

83

(d) Over \$35,000

95

4. Provide the number of multi-family units in each of the following rental categories and ranges.

Type	Rental Range				
	Under \$100	\$100 - \$149	\$150 - \$199	\$200 - \$249	\$250 & Over
Efficiency	0	31	40	1	0
One-Bedroom	1	0	23	365	468
Two-Bedroom	19	6	3	1	257
Three or more Bedrooms	2	0	0	1	1

5. Provide the total number of mobile homes in municipality that exist as conforming uses under current zoning ordinance. None

6. Provide the number of housing units within the municipality that are below the standards required for new construction or rehabilitation in local building codes and housing standards ordinance. Indicate how many are currently occupied and how many vacant.

2 - occupied  
2 - unoccupied

7. Provide for each department in the municipality the number of municipal employees by job category, race, and annual salary or hourly wage.

Executive	2	white	\$10,000 per year +
Police	2	white	\$10,000 per year +
Road and Park	3	white	\$3.00 per hour
Sanitary L.F.	1 p.t.	white	\$2,600 per year
Building Inspector	1 p.t.	white	\$8,000 per year

8. Provide the number of county and state employees working or employed in the municipality by job category, race, and annual salary or hourly wage.

Information not available.

9. For each zoning use category (and subcategory, if necessary, in the municipality) state the total number of acres contained therein and state how many acres are vacant. (For example, R-1 residential; 130 acres; 23 vacant).

<u>Zone</u>	<u>Total acres</u>	<u>Developed acres</u>
R-200 (rural)	2,765	200
R-85 (residence)	250	120
G.B. (business)	5	2
Industrial	2,135	800
E-R (educational- research)	885	400

10. List the proposals or requests for amendment to the zoning ordinance to authorize or facilitate residential construction of the types listed below, from January 1, 1970 to the present, setting forth the date of the proposal or request, name of requesting party, and ultimate disposition. If units were to be subsidized under state or federal programs, state what program was involved.

(a) Single-family detached or attached home construction (involving 10 or more contiguous lots).

Kraft & Pilshaw "Country Village"; original application filed in 1966; that application tabled because no sewer capacity was available; approved April 11, 1973.

(b) Multi-family structures.

Lincoln Property Company; application submitted July 22, 1970; general development plan approved March 12, 1971

(c) Planned unit or other cluster developments.  
Hoffman-Rosner, application submitted January 28, 1974; denied May 20, 1974;  
law suit pending challenging zoning ordinance.  
Solomon Rieder; application submitted January 28, 1974; classified as major  
subdivision February 18, 1974; preliminary application still under  
consideration of Board  
Princeton University; PMUD application submitted February 17, 1975; to be  
(d) Mobile home sites. considered by Board on April 7, 1975.

None

11. List for the following four categories, the applications for, use variances, special permits or exceptions that have been filed from January 1, 1970 to the present, setting forth the date of initial application, name of the requesting party, and ultimate disposition of application. If units were to be subsidized under state or federal programs, state what program was involved.

(a) Detached or attached single-family home construction (involving 10 or more contiguous lots).

None

(b) Multi-family structures.

None

(c) Planned unit or other cluster developments.

None

(d) Mobile home sites.

None

12. List the name, address, race and duties of each municipal official, employee, and consultant involved in the municipal zoning and planning process: State the source of their authority.

See Exhibit "A"



12. (Continued)

13. State whether there are any state or federal subsidized housing units now within or planned for the municipality. If so, list the location, number, size and type of units, project racial occupancy percentages, source of the subsidy and date of initial occupancy.

None

(a) State whether the municipality ever affirmatively encouraged or assisted in the provision of subsidized housing.

Yes. The Planning Board has attempted to encourage PUD developers to include subsidized housing in approximately 15% of their units.

(b) State whether any official body of the municipality has ever discussed providing subsidized housing. If so, list the name of the deliberating body, the date and time of the meeting and provide a copy of the minutes or any report resulting from such meetings.

The Planning Board. No minutes available.

(b) (Continued)

14. State whether there has been any correspondence, contact, or meetings since January 1, 1970 between any municipal officials, employees, or consultants and any county or regional planning body regarding your municipality's housing needs. If so, please attach copies of such correspondence and provide the dates and times of such meetings or contacts indicating whether a written record of such meetings or contacts was ever made.

No

15. State whether the municipality has a rent control ordinance. If so, specify when such an ordinance was first considered and the date of adoption. Attach a copy of the ordinance and the minutes of council meetings at which such an ordinance was considered, and any documented statistics on housing conditions presented at such meetings.

No

15. (Continued)

16. State whether at any time from January 1, 1970 to the present there has been in effect a sewer, building permit, or other moratorium relating to housing. If so, state the effective date, who imposed it, and the terms and conditions thereof.

Yes. Moratorium on major subdivisions and rezoning for period of one year, effective March 22, 1974, Ordinance adopted by the Township Committee. Exempt from moratorium are any applications for major subdivisions or rezoning before the Board at the time of the effective date; ordinance does not prohibit minor subdivisions or uses presently permitted in any zone; no variance or special exception from ordinance permitted. Moratorium extended by ordinance for additional period of six months.

17. State whether as a condition of employment any municipal employee is required to live within the boundaries of the municipality or the county. If so, indicate how long such requirement has been in effect, its scope and who imposed it.

No.

18. For each commercial, industrial, or other business establishment within the municipality having 15 or more employees, list its name, address, number of employees, and the year it first opened for business.

FMC Corporation, Princeton Road, Plainsboro; 500; 1956

Firmenich Inc., Princeton Road, Plainsboro; 75; 1957

Walker Gordon, Princeton Road, Plainsboro; 15; 1898

I.R.L., Schalks Road, Plainsboro; 18; 1959

Princeton University - Forrestal Campus; (information not available at this time, will be submitted within one week)

19. State whether the municipality has a fair housing or anti-blockbusting ordinance. If so, attach a copy. No

20. State whether your municipality has ever taken steps to encourage industry to locate in the municipality. If so, please indicate what steps have been taken.

No

21. Attach a copy of the current zoning ordinance and any and all amendments in force; and a copy of any proposed amendments to the zoning ordinance that are currently pending before the governing body.

22. Identify the location of the official zoning maps, the coverage, and date of preparation. State whether zoning maps incorporating the most recent amendments are available. If so, state where they can be obtained and the price thereof.

Available at the Township Clerk's Office, Township Municipal Building, Princeton Road, Plainsboro. \$2.00 per copy for ordinance and map.

23. State whether your municipality has proposed and adopted a master plan. If so, please identify a copy indicating the coverage, date of preparation, and number of pages. Also identify by location and content all amendments and background reports prepared in conjunction with such master plan amendment.

A master plan has been proposed. As of this date the plan has not been adopted. Copy attached.

24. State whether the municipality has had prepared or is preparing studies, planning papers, research reports or other similar documents in the areas listed below. Identify each item by author or title, subject, date, number of pages, location of copies and indicate whether a summary is available:

(a) The need for housing within the municipality;

In connection with Master Plan studies

(b) The condition and amount of existing housing stock;

In connection with Master Plan studies

(c) The inception of programs relating to code enforcement;

In connection with Master Plan studies

(d) The requirement for residential densities, floor space, bedroom ratios, and mobile homes within the municipality;

In connection with Master Plan studies

(e) The need for providing low and moderate income subsidized or unsubsidized housing within the municipality;

**In connection with Master Plan studies**

(f) The utilization of land for commercial and residential or industrial purposes; and

**In connection with Master Plan studies**

(g) The wage and salary scales of employees within the private sector of the municipality.

**In connection with Master Plan studies**

25. State whether your municipality has ever been studied by, advised by, or received assistance from agencies of federal, state or county government, in preparing studies or other information concerning the areas listed below. Identify each item by author or title, subject, date, number of pages, location of copies, and indicate whether a summary is available.

(a) Need for housing within the municipality and surrounding areas;

No

(b) Attitudes toward housing within the municipality and surrounding area;

None

(c) Housing costs within the municipality and surrounding area;

None

(d) The amount and percentage of vacant acreage zoned for industrial use.

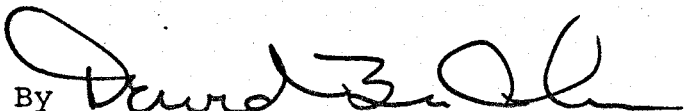
None

26. State whether you have ever received any federal or state assistance for any purpose since 1960, setting forth the date and size of the grant, the use to which such funds were put, the location of use, and whether any funds remain to be expended.

No

26. (Continued)

BAUMGART & BEN-ASHER  
Attorneys for Plaintiff

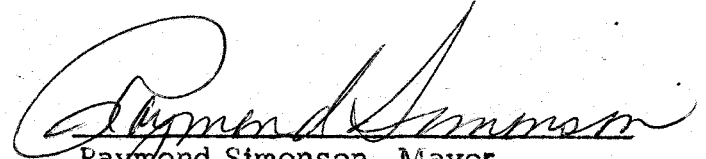
By   
DAVID H. BEN-ASHER  
A Member of the Firm

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

TOWNSHIP COMMITTEE OF THE  
By TOWNSHIP OF PLAINSBORO

DATED: February 28, 1975

  
Raymond Simonson, Mayor



1. continued:

4,000 - 4,999: 2.4% ; 5,000 - 5,999: 4.8%

6,000 - 7,999: 7.3%; 8,000 - 9,999: 21.4%

10,000 - 14,999: 25.47% ; 15,000 - 24,999: 22.49%

25,000 - 49,999: 8.6% ; 50,000 and above : none

Average Income 1970

Per capita income - \$4,088

Family mean income - \$13,127

Although this is the only available source to the Township, it is the belief of the Township Clerk that the present population is approximately 3,200.

9. continued:

PCD (planned community development)	1,120	120
SR (service residential)	80	40