

Response to interrogatories for Planesboro Twp

P 27

CA002649G

RESPONSE TO INTERROGATORIES
FOR PLAINSBORO TOWNSHIP

IN THE MATTER OF URBAN LEAGUE OF GREATER NEW BRUNSWICK

VS.

THE MAYOR & COUNCIL OF THE BOROUGH OF CARTERET

ET AL DEFENDANTS

February 1984

MT. LAUREL OBLIGATIONS

Item 1-a:

The region, as defined in "Fair Share Allocation Report Urban League of Greater New Brunswick, et al vs. Borough of Carteret et al, No. C-4122-73" prepared for the Honorable Judge Serpentelli, J.S.C. by Carla L. Lerman, P.P., November 1983, is accepted.

The region is defined as the south metro region of the greater metropolitan region, and includes Middlesex, Union, Mercer, Somerset, Monmouth, and Hunterdon Counties.

Item 1-b:

The factual basis and methodology for delineating the region as outlined in "Fair Share Allocation Report Urban League of Greater New Brunswick, et al vs. Borough of Carteret et al, No. C-4122-73" prepared for the Honorable Judge Serpentelli, J.S.C. by Carla L. Lerman, P.P., November 1983.

Item 2-a-1:

The Township accepts the figure of 22,057 total present housing units to be allocated to the north metro and south metro regions.

Item 2-a-2:

The total prospective need through 1990 for safe decent housing in the region is 55,708 units as indicated in the "Lerman Report."

Item 2-b:

The methodology cited in the "Lerman Report" dated November 1983 is accepted.

Item 3-a:

Plainsboro Township intends that its fair share of

unmet present and prospective regional need is 488 housing units.

Item 3-b:

The factual basis for the determination of fair share allocation is that of the "Lerman Report" dated November 1983.

Item 4-a:

Plainsboro contends that the present unmet housing need for indigenous poor is 46.

Item 4-b:

Factual basis and methodology for determining the indigenous need is that of the "Lerman Report" dated November 1983.

Item 5-a:

Plainsboro Township has reviewed the following reports with regard to this determination of region, regional need, fair share allocation, and housing need for indigenous poor:

"Expert Report on Mt. Laurel II Issues In Urban League of Greater New Brunswick vs Borough of Carteret et al" by Alan Malloch December 1983

"Fair Share Allocation Report Urban League of Greater New Brunswick vs Borough of Carteret et al" No. C-4122-73 by Carla L. Lerman, P.P. November 1983

Item 5-b:

The court has copies of both of these studies but additional copies can be provided if needed.

Item 6-a:

No other study has been conducted specifically for

Plainsboro Township with regard to this litigation.

Item 6-b:

No copy is attached as no studies were done.

Item 7:

Plainsboro Township contends that the locus of this Mt. Laurel obligation is within the growth area set forth in the State Development Guide Plan as revised which includes all portions of Plainsboro Township west of the Amtrak mainline.

Item 7-abc:

There is no answer since no such claim was made.

Item 8-ab:

No claim as set forth in question 7.

Item 8-c:

A map of the municipality indicating the boundaries of the locus is attached as Appendix A. This is in agreement with the State Guide Plan.

Item 9:

Plainsboro Township contends that the following are the rent ranges which are affordable by low income households:

1 person	\$286.25/month
2 person	\$327.50/month
3 person	\$367.50/month
4 person	\$408.75/month

Rentals for moderate income households are as follows:

1 person	\$455.00/month
2 person	\$520.00/month
3 person	\$588.00/month
4 person	\$650.00/month

Plainsboro Township contends that the sales price for a housing unit for low income households, 4 persons assuming an interest rate of 13% be no greater than \$31,435.

Plainsboro Township contends that a housing unit for moderate income household, 4 persons be no greater than \$49,992.90.

Item 10-b:

The factual basis and methodology include the following assumptions:

For sales a 90% mortgage for 30 years @13%, property taxes at 1.75% of equalized market value, insurance at \$40 per \$10,000 of house value, and maximum homeowner association fees or other fees \$150 per \$10,000 of value.

For rentals and Sales housing if its assumed that 30% of income may be used for housing costs.

Item 11:

Reports, studies, and memoranda, and other documents used are "Expert Report on Mt. Laurel II Issues in Urban League of Greater New Brunswick vs Borough of Carteret et al" prepared by Alan Malloch December 1983 and the "Lerman Report" November 1983.

Item 12-a:

Plainsboro Township is a participant in the Middlesex County Housing Agency.

Item 12-b:

Plainsboro Township is a member of Middlesex County Housing Agency, which is a regional housing agency.

Item 12-c:

No action.

Item 12-d:

Plainsboro Township required the set aside of 20% of a 600-unit residential development as part of a planned multi-use development. The housing has been constructed and operates on a not-for-profit basis in order to keep rent levels within the range of affordable by low and moderate income residents. This housing has been constructed.

Item 12-e-1:

No land has been rezoned from industrial to multi-family use.

Item 12-e-2:

On April 16, 1979 the Planning Board approved expansion of the general development plan to the Linpro Company. Result was the expansion of the previous approval of 5,110 residential units, most of which were apartments, to a total of 6,324 residential units including the 5,110 apartments and single-family homes on lots as small as 6,000 sq ft as well as townhouses. This change provided the framework for a variety of housing types and lot sizes which make them affordable and qualify as least cost housing.

Item 12-e-3:

No other areas have been rezoned from non-residential uses to allow multi-family housing.

Item 12-e-4:

No rezoning for conversion of single family housing units to multi-family housing has taken place. Less than 25% of the total housing units in Plainsboro Township are single-family houses.

Item 12-f:

No zoning has taken place for manufactured or modular

housing since it is the Township's understanding that manufactured or modular housing meets the building codes of the State and can be placed on any lot anywhere in the community without special approvals.

Item 12-g:

No zoning has taken place for mobile homes or mobile home parks.

Item 13:

Plainsboro Township has agreed to and is a member of the Middlesex County Housing Agency. This has taken place since May 4, 1976.

Plainsboro Township has approved a PMUD in the Forrestal Village area of Plainsboro which had a mandatory set aside of 20% of the housing units built at not-for-profit and operated at no profit by the developer. These units have been constructed and occupied since 1980.

Plainsboro Township has rezoned and approved the development of properties previously zoned for agricultural use for an expansion of the planned community development in Plainsboro, increasing the total number of housing units from 5,110 to 6,324. These housing units are under active development at the present time.

Item 14:

Plainsboro Township has been a member of the Middlesex County Housing Agency since May 14, 1979.

The 120 units of housing in the Forrestal Village PMUD has been constructed and is currently being occupied.

The rezoning for expansion of the planned community development and approval was done in April 1979 and is actively under construction.

Item 14-b-1,2:

The Township Committee, by resolution, joined the

Middlesex County Housing Agency on May 14, 1979.

The Plainsboro Township Planning Board approved the PMUD and the 120 units of non-profit housing in Forrestal Village on June 20, 1977.

Plainsboro Township adopted an ordinance to expand the planned community development on May 1, 1979.

The Planning Board approved the modification of the General Development Guide Plan on April 16, 1979.

Copies of the resolutions and ordinances noted are included as Appendix B to this answer.

Item 14-c:

With regard to the Forrestal Village development, the following apply:

The developer was Sarchik & Edwards of Cherry Hill, New Jersey.

The units are located on the westerly side of US Route 1. 120 housing units were developed on 8.66 acres with a density of 13.86 housing units per acre.

The units constructed are in garden apartments:

24 one-bedroom units	\$358/month
72 two-bedroom units	\$429/month
16 three-bedroom units	\$499/month
8 four-bedroom units	\$575/month

These are the rents as of January 1, 1984. The rents as of the date of construction are unknown. The date of initial occupancy was early 1980.

The current vacancy rate is 0.

The percentage of total residential units in a municipality represented by the housing constructed as a result of the measure is 3.6%.

With regard to the Princeton Meadows PCD expansion, the name and address of the developer is the Linpro Company, Plainsboro, New Jersey. The location of the units is between Dey Road and Cranbury Brook in Plainsboro, New Jersey. The total number of dwelling units developed to date is approximately 4,500 units of which 4,300 are apartments. The planned community development being developed at a gross density of 6.87 units per acre, which includes all facilities of the planned community.

Of the units constructed to date, the 4,300 multi-family units rent as follows:

one-bedroom unit	\$395-\$465/month
two-bedroom unit	\$475-\$545/month

Single-family homes sell in the \$100,000-\$130,000 range and townhouses sell in the \$80,000-\$105,000 range.

The units have been put on the market for the rent and sale continuously since 1972. The rent levels at the time they were put on the market are not known; the rent levels indicated are current.

Current vacancy rate is 0%.

The total housing in the PCD represents 72.4% of the total housing units in the community. The expansion of the PCD by 1,214 units in 1979 represents 22.7% of the housing units currently in existence in the community.

Item 14-d:

Appendix C includes all copies of reports, studies, surveys, etc. regarding implementation of these measures.

Item 15:

In addition to the items outlined in Items 12 and 13, Plainsboro Township has expeditiously reviewed and approved for actual development each of the specific sections of the PCD and PMUD. In the PCD since 1976 this includes approximately 3,200 units of apartments whose current rents are indicated above.

Item 17:

Plainsboro Township has not considered for implementation any of the measures described in Items 12 and 13 from May 4, 1976 to the present which has not been detailed in questions 14, 15, and 16.

Item 18-a,b,c,d:

The Township Committee, the Planning Board, and the Board of Adjustment did not consider and therefore did not implement any other measures to create opportunities for housing affordable by low and moderate income households. The Township did conduct a Housing Study dated August 1982. The recommendation from that study, a copy of which is attached as Appendix D, was that 50 units of senior citizen housing on a subsidized basis be constructed in Plainsboro Township.

Item 19-a:

See materials attached.

Item 19-b:

The next review of the Township Master Plan and resultant review and revision of the zoning ordinance will occur in September of 1988.

Item 20-a:

All ordinances dealing with land development of any type in Plainsboro Township included in the Code of the Township of Plainsboro and detailed in Chapters 20, 67, 85, and 101 of the Code. Up to date copies of which are attached.

Item 20-c:

See attached.

Item 20-d:

Appendix E attached includes copies of ordinances in effect prior to adoption of the additions, revisions, or amendments stated.

Item 20-e:

All sections, ordinances, repealed are included in

Item d above.

Item 20-f:

See attached.

Item 20-g:

There were no proposals for revisions of ordinances and regulations listed in 20-a that were considered but not adopted.

Item 20-h:

There were no proposals outlined in 20-g.

Item 21-a:

There are no land-use ordinance or regulations or amendments thereto currently being considered by the Planning Board or governing body or Board of Adjustment of the Township except for those currently being considered as follows:

Rezoning of Block 18, Lot 2 and Block 22, Lots 1.01 and 2 to General Business use in order to conform with the current use, and revision of home-occupation professional office regulations.

Copies of all proposals and written reports with regard to these items are available.

Item 22-a:

The Master Plan for Plainsboro Township, New Jersey by Raymond, Parish, Pine, and Weiner dated September 1982 is the Master Plan in force and effect for Plainsboro Township and includes various Master Plan elements and land use inventory.

Item 22-b:

Attached is a copy of the Master Plan of the Township.

Item 22-c:

The Master Plan was prepared by Raymond, Parish, Pine,

and Weiner in September 1982. Copies of all documentation and background thereto are available at the Municipal Center administration building, 641 Plainsboro Road, Plainsboro, New Jersey. They are too voluminous to copy.

Item 23:

The Township of Plainsboro is not in the process of revising its Master Plan and there is, therefore, no response to Items a,b,c,d.

Item 24:

Attached is a copy of the Zoning Map of the Township of Plainsboro adopted June 27, 1983. There are no other maps that regulate land use in Plainsboro Township.

CURRENT LAND USE

Item 25-a:

Non-residential uses:

a-1 industrial	1,268 acres	34.0%
a-2 office	330 acres	8.8%
a-3 commercial	40 acres	1.1%
a-4 other (specify)	0	

Item 25-b:

One acre or larger single-family housing:

1,000 acres 26.8%

Item 25-c:

Less than one acre but larger than one-quarter acre single-family housing:

210 acres 5.6%

Item 25-d:

Less than one-quarter acre single-family housing:

0

Item 25-e:

Multi-family housing:

73 acres 2.0%

Item 26:

A tax map consisting of 26 pages is available at the Administration Building, 641 Plainsboro Road, Plainsboro, New Jersey.

Item 27-a,b,c,d,e,f,g,h,i,j,k,l,m,n,o,p,q,r,s,t:

R-100 Agricultural Zone has 1,320 acres. None of this land is vacant since it is all in active agricultural use. The major parcels of land which are in agricultural use include:

Block 11	Lot 29.02	70.54 acres
Block 11	Lot 28	115.50 acres
Block 11	Lot 27.02	211.44 acres
Block 11	Lot 26	42.50 acres
Block 11	Lot 21	4.98 acres
Block 11	Lot 22.01	48.95 acres
Block 11	Lot 19.02	113.05 acres
Block 11	Lot 16.03	15.78 acres
Block 11	Lot 17	13.48 acres
Block 11	Lot 18	23.30 acres
Block 14	Lot 19	131.95 acres
Block 14	Lot 21	28.10 acres
Block 14	Lot 22	101.60 acres
Block 14	Lot 24	27.50 acres
Block 13	Lot 11	7.50 acres
Block 13	Lot 7	27.50 acres
Block 13	Lot 6	22.30 acres
Block 13	Lot 5	6.30 acres
Block 13	Lot 3	82.75 acres
Block 13	Lot 2	30.41 acres
Block 12	Lot 5.04	61.87 acres
Block 12	Lot 1	18.00 acres
Block 12	Lot 2	56.00 acres
Block 12	Lot 3	14.80 acres
Block 12	Lot 4	5.62 acres

None of the above-noted parcels have approved site plans or have site plans pending.

All of the above are actively farmed. It is estimated that of the 1,320 acres in this area, 250 acres are not developable because they lie in a flood plain.

Without detailing each of the parcels so constrained, the properties along the Millstone River and along Cranbury Brook have these environmental constraints.

For the remaining 1,040 acres of land in this area, there are no constraints related to bedrock close to surface, steep ground slopes, and the like, other than location within a flood hazard zone, as noted. All of the lands noted are Class I and Class II agricultural soils. None of the properties noted have public sewer or water accessible to them. All the properties would require extension of public utilities and infra-structure for residential development. None of the lots noted are in the growth areas delineated in the State Development Guide Plan.

R-300. Within the R-300 zone there are approximately 1,000 acres of land. This land includes:

	Block 6	Lot 23.02	151.20 acres	
	Block 6	Lot 21	28.28 acres	
	Block 6	Lot 20	27.30 acres	
Portions	Block 21	Lot 19.02	107.00 acres	approx.
	Block 6	Lot 18	21.59 acres	
	Block 6	Lot 11	31.68 acres	
	Block 6	Lot 13	78.00 acres	
	Block 6	Lot 14	11.00 acres	
	Block 6	Lot 16	19.50 acres	
	Block 10	Lot 13.06	67.44 acres	
	Block 10	Lot 12	43.60 acres	
	Block 10	Lot 39	4.28 acres	
	Block 10	Lot 25	31.60 acres	
	Block 7	Lot 2	76.90 acres	
	Block 7	Lot 5	13.27 acres	
	Block 7	Lot 6	28.90 acres	
	Block 16.16			
		Lot 23.03	10.79 acres	
	Block 16.16			
		Lot 24.01	17.26 acres	

There are no properties within this area that are subject to pending site plans or subdivision approval. Of the 1,000 acres in this area, 630 acres are farmland. The remaining 370 acres are within flood plains and therefore are not able to be developed.

Without specifying specific lots these include properties to the north of this zone along the shallow brook area.

Soil in this area is a sassafras and woodstown soil with some metapeak soils. Running through the site is an overhead transmission line with underground gaslines owned by PSE&G.

All properties in this area would require extension of municipal services and infrastructure, but the existing utility lines are generally close to or within a couple thousand feet of most of the properties. All properties would require some infrastructure extension.

Block 6.16, Lots 24.01 and 23.03 are reserved for an elementary school site and should not be considered available for residential development. Therefore, approximately 600 acres are vacant and available for residential development. These include portions of all the parcels noted except for Block 6.16 Lot 24.01 and Lot 23.03. None of the properties in question is located in the growth areas delineated in the State Development Guide Plan. This zone is set up in order to be used as a receiver zone for Transfer of Development Credits when this mechanism is able to be used.

R-200 Zone. The total number of acres in the R-200 zone is approximately 270; of this approximately 140 acres are vacant, these include:

Block 6	Lot 5.02	65.03 acres
Block 6	Lot 4	58.00 acres
Block 6	Lot 1	16.09 acres
Block 6	Lot 37.02	14.91 acres

None of the properties in question have approved site plans, but Block 6, Lot 37.02 has an application for subdivision approval pending.

120 acres of vacant land are in farmland use. This includes:

Block 6	Lot 5.02
Block 6	Lot 4

There are no properties that cannot be used for residential use because of environmental constraints, but the fallsington loam soil on the easterly 1/3 of the 120 acres in farmland--these limitations render that portion of the property difficult and more costly to develop because the water table is close to the ground surface.

All of the vacant acres would require extension of municipal services, including water and sewer. Water extension would be relatively easy to extend from adjacent properties. Sewer extension would be difficult because there is no sewer franchise for this area and extension of sewer franchise would be costly. In addition, one of the proposed alignments for State Route 92 would take the entirety of Block 6, Lot 37.02. The other alignment would traverse a portion of Block 6, Lot 4 rendering portions of this undesirable for residential development. The entirety of the vacant land in this area is within the growth area in accordance with the State Development Plan.

R-85 Zone. The R-85 zone consists of approximately 405 acres of land. Of this, 70 acres is vacant. The vacant land consists of:

Block 15	Lot 16.01	35.90 acres
Block 15	Lot 36.01	36.145 acres

There are no approvals existing or pending in these areas. Approximately 40 acres are farmed. This includes the entirety of Lot 16.01 and a portion of Lot 36.01. Approximately 30 acres of this land cannot be used for residential development because they are in the flood plain.

In addition, approximately 5 acres are used as a sewerage treatment plant and cannot be used for residential development. There are no other known constraints to residential development on this property. The soils are woodstown and metapeak soils. Public water is available adjacent to the properties in question. Sewer is available with a hookup fee, at a minimum cost of \$1,400 per residential unit. None of the property in question is in the growth area delineated in the State Development Guide.

PCD Zone. In the PCD zone a total of 920 acres. Approximately 120 acres is vacant; this includes:

Block 10	Lot 7.01
Portions Block 11	Lot 5.02

Lot 7.01 is 73 acres and Lot 5.02 is 85 acres. All of this land has approved PCD concept plans and site plans and subdivisions are pending on the entirety. All of this land is currently farmed. Of the land noted, approximately 10 acres of Lot 5.02 is in a flood plain and is not usable for residential purposes. There are no other constraints to development of this land. Soil content is such that it would permit residential use. Utilities are available for all vacant land in the PCD zone. State Route 92 original alignment runs through a portion of Lot 5.02 and would render significant portions of it unsuitable for residential development.

PMUD Zone. Within the PMUD there are 1,520 acres, of this 815 acres are vacant. Approximately 500 acres of that vacant land is part of an open space system which has deed covenants as part of the PMUD development. Much of this land would be open spaces within flood plains, on steep slopes, and otherwise unsuitable for development. Of the remaining 315 acres that is vacant:

Block 3	Lot 1.27	63.415 acres
Block 3	Lot 1.01	30.910 acres
Block 3	Lot 1.04	26.500 acres
Block 3	Lot 1.22	33.000 acres

In addition,

Block 5	Lot 68	11.270 acres
Block 5	Lot 18.05	21.350 acres
Block 5	Lot 18.06	44.250 acres
Block 5	Lot 18.03	23.490 acres
Block 5	Lot 14.01	10.980 acres
Block 5.03	Lot 12.16	40.000 acres
Block 5.03	Lot 18.04	20.800 acres
Block 5	Lot 51.01	31.300 acres

A comprehensive development plan has been approved for all properties in the PMUD. All of the available properties in Block 3 have approvals for development. Approximately 50 acres of this area is not developable because of soil conditions, steep slope, flood plain. In Block 5 the property noted is within an office/research development. Block 5.03, Lot 12.16 has a site plan approval. Block 5.03, Lot 18.04 is entirely within the flood plain. Block 5, Lot 51.01 is within the approach zone to the Princeton Forrestal airport. All untreed land in this area is not being built upon and is used for farming purposes. Utilities are available to all portions of this site. There are no impediments other than those noted for development for residential purposes. The entirety of this site is within the growth area delineated in the State Development Guide Plan.

GB (General Business) Zone. The land area is approximately 50 acres, 40 of which are vacant. The vacant land includes Block 5, Lot 23 of 19 acres and Block 5, Lot 22 of 17 acres. Concept approval has been granted for this property for retail/commercial/professional office use. The entire 40 vacant acres are farmed.

Approximately 4 acres of the property adjacent to the railroad is low and prone to flooding. There are no other constraints to development. The soil type is adequate for residential development. Constraints to residential development are the Amtrak mainline along the westerly boundary of the property, the location of Scudders Mill Road along the northerly boundary of the property. Scudders Mill Road crosses the railroad on a high embankment and is a high-speed truck route. The entire 40 acres would require extension of utilities to the property. Water is nearby, but there is no sewer franchise currently available to the property. Sewer franchise could be extended at a cost. This property is not within the growth area delineated in the State Development Guide Plan.

SR (Service Residential) Zone. Consists of a total of 40 acres of land, none of which is vacant.

OB-1 (Office Business) Zone. Consists of 380 acres of land, 330 of which are vacant. This includes:

Block	3	Portions of Lot 2	
Block	3	Lot 3	53.16 acres
Block	4	Lot 3	55.00 acres
Block	4	Lot 4	101.00 acres

There are no approved site plans or site plans pending for this property. All of the area in question is farmed. The only environmental constraint is one location where an intermittent streambed occurs involving approximately 10 acres. This occurs on Block 4, Lot 4. There are no other constraints to residential development. The soil content is adequate for residential development. There are no other physical conditions affecting residential development. Sanitary sewers need to be extended to all these properties for development. There is no sewer franchise available and franchise could be extended at a cost. Kingston Water Company (being purchased by Elizabethtown Water Company) is located in this site but there is a question as to the adequacy of the water system to support residential development. This area is within the growth area in the State Development Guide Plan.

I-100 Zone. In the I-100 zone (limited industrial zone) there are approximately 590 acres, of which 203 are vacant. The vacant properties consist of Block 15, Lot 5. There is no site plan or subdivision approved or pending for the property. The entire area is used as the home base for farming. The area is not actively cultivated, but includes farm buildings and storage and work areas related to farming use. Of the 203 acres, approximately 75 cannot be used because of flood plain considerations for the remainder of the site. The soil is suitable for residential development. The existence of the Amtrak mainline on the easterly property line is a constraint to development on portions of the site. There is public water supply available on Plainsboro Road adjacent to the site. There is no public sewer available to the site and sewer can be extended by payment of a sewer franchise fee. The entirety of this site is located within the State Development Guide Plan Growth area.

I-200 Industrial Zone. The I-200 Industrial Zone consists of approximately 1,065 acres. Virtually all of this land is vacant. The property includes:

	Block 6	Lot 6	255.000 acres
	Block 6	Lot 8.02	142.000 acres
	Block 6	Lot 49	143.000 acres
	Block 6	Lot 7	123.000 acres
Portions	Block 6	Lot 19.02	100.000+acres
	Block 6	Lot 22.01	161.000 acres

Virtually all of the land in question is vacant. None of this land has approved site plan or site plan pending. Approximately 200 acres of the total is farmed. All of the remaining land except for approximately 150-200 acres

is not usable for residential development, since it is in a flood plain. The reason for the industrial zoning is that significant portions of the land are owned and/or leased by McCormack Sand & Gravel and there is an inactive sand and graving mining operation located on portions of this site. There are no public utilities at or near the site and extension of public utilities would be extremely expensive, even if a franchise were granted. None of the area in question is within the growth area delineated in the State Development Guide Plan.

Item 28-a-e:

The pending subdivision application for 14 acres by Reider Land Technology was made to the Township Planning Board in early 1984. There is no approval to date. The application is for single-family homes on 1/3 acre lots in the R-200 Zone.

In the PCD Zone, the general development plan for the property provides for townhouses on a portion of this 73-acre site and office/research development on a portion of the 85-acre site. Development Guide Plan was revised in April 1979. This site plan and subdivision approval has not yet been granted. The applicant is Linpro Company, Plainsboro, New Jersey. The applicant's attorney is unknown.

Within the PMUD Zone, the portions of Block 3, includes residential homes in nature of patio homes, townhouses. This was part of the overall plan approval in 1976, with residential development under construction. In Block 5 within the PMUD Zone 40 acres received preliminary site plan approval for office/research development by Prudential Insurance Company. The entirety of the PMUD received general plan approval and the portions in Block 5 are for office/research development.

Within the General Business Zone conceptual plan approval has been granted for retail/commercial/professional office space to cover the entire 40 acres and conceptual approval was granted in 1983.

Item 29:

Copies of all site plan and subdivision applications are available at the Municipal Center Administration Building, 641 Plainsboro Road, Plainsboro, New Jersey.

Item 30:

In the R-100 Agricultural Zone, all of the land in question is Class I and Class II Farmland. In the R-200 Zone

approximately 2/3 of the land is Class I and Class II Farmland, the remaining 1/3 is Class III Farmland. In the R-300 Zone, approximately 80% is Class I and Class II Farmland, and the remainder is Class III Farmland.

See Map II-5 in the Plainsboro Township Master Plan for details.

Item 31:

Since 1970 approximately 1,500 acres of farmland have been developed for non-farming purposes. Of that, approximately 800 acres has been developed for multi-family residential purposes.

Item 32:

Approximately 56% of the Township is farmland.

Item 33-a:

The Township owns approximately 6 acres of vacant land. This includes:

Block 12	Lot 4	5.62 acres
Block 22	Lot 3	1/3 acre

The 5.62 acre lot is entirely within the flood plain and is unsuitable for residential development. Block 22, Lot 3 is a residential lot which can be sold as a single residential lot.

Item 34:

Plainsboro Township has been developing at a very fast rate since 1970. The following is a summary of activity since 1976, and details are available at the Municipal Center, 641 Plainsboro Road, Plainsboro, New Jersey.

Residential Development shown on page 11 of the tax map. The Country Village development of single-family homes on approximately 1/3 acre lots was approved and developed since 1975. There are approximately 70 single-family homes and 24 townhouses.

US Home 425 single-family homes on approximately 1/3 acre lots clustered, was approved in the mid-1970's.

Within the Planned Community Development in the Princeton Meadows area, since 1976 the following have been approved and are in some status of construction or completed:

Hunters Glen Apts	approx 900 units
Quail Ridge Apts	approx 800 units
Pheasant Hollow Apts	approx 400 units
Aspen Condominiums	250 units
Raven Crest Apts	850 units
Gentry Single-Family Homes	350 units
Brittany Townhouses	250 units
Princeton Meadows Shopping Center	60000 sq ft
Princeton Meadows Office Commons	60000 sq ft
Princeton Meadows Office/Research Park	34000 sq ft

Within the Princeton Forrestal PMUD Forrestal Village Apartments (constructed not-for-profit and operated non-profit) 120 units

Princeton Landing Development townhouses and patio homes approximately 100 units

Princeton Forrestal Center 101, 102, 103, 104, and 105 College Road East office/research developments approximately 500,000 sq ft

201, 202, 203 College Road East 250,000 sq ft

Scanticon Conference Center 308 rooms plus conference center and restaurants

RCA American Communications 250,000 sq ft

Enterplex 300,000 sq ft

Xerox Building 75,000 sq ft

Exon Building 200,000 sq ft

Stillman Building 250,000 sq ft

FMC addition 280,000 sq ft

Item 35-a,b,c,d:

Answered in Item 34.

Item 35-d:

Rent levels have been previously indicated.

Item 35-e:

Actions were limited to site plan or subdivision approval and limited variances. The date of these actions are on-going since May 4, 1976 and are available in the minutes of the Planning Board of the Township of Plainsboro.

Item 35-f:

The zones are indicated in answer 34.

Item 35-g:

This has previously been indicated in the interrogatories.

Item 36:

The volume of site plan and site plan applications is too voluminous to attach; these applications are available in the Administration Building, 641 Plainsboro Road, Plainsboro, New Jersey.

Item 37:

There have been no applications for approval of 10 residential units or more or 5,000 sq ft of commercial/ industrial space for which approval has been denied between May 1976 and the present.

Item 38:

There were no such applications.

Item 39:

There were no such applications.

Item 40:

There are no law suits pending to the best of our knowledge.

Item 41:

The Township contends that there are less than 10 housing units in Plainsboro Township that meet the previously stated criteria for low income households. These 10 housing units would be the rental housing units scattered in single-family homes; some of these are probably illegal conversions.

Item 42:

Plainsboro Township contends that there are approximately 4,000 housing units in existence in the Township which are affordable by moderate income households. These include one and two bedroom apartment units in Fox Run Apartments, Deer Creek Apartments, Hunters Glen Apartments, Pheasant Hollow Apartments, and Quail Ridge Apartments, as well as Forrestal Village Apartments. The current rents for one-bedroom units in the Princeton Meadows development which includes 3,900 of the 4,000 units are \$395-\$465/month plus utilities; two-bedroom apartments rent for \$475-\$545/month plus utilities. In the Forrestal Village complex there are 24 one-bedroom apartments with a rent of \$358/month plus utilities, 72 two-bedroom apartments with a rent of \$429/month plus utilities, 16 three-bedroom apartments with a rent of \$499/month plus utilities, and 8 four-bedroom apartments with a rent of \$575/month plus utilities. In the Millstone River Apartments, which include 120 units, there are 72 efficiency apartments with a rent of \$270-\$280/month, 41 bedroom apartments with a rent of \$320-\$330/month, and 8 apartments with a rent of \$420/month plus utilities. Within the Forrestal Village apartments all 120 units are occupied by moderate income households. It is our impression that in the Millstone Apartments, all 120 units are occupied by low or moderate income residents; and the Princeton Meadows developments a 1982 survey of new move-ins indicates that of those move-ins in 1982, 24.8% or 326 households have incomes below \$20,000/year (which surely falls into the moderate income category).

Item 43-a,b:

There are no publicly assisted housing units in the municipality. This part of Middlesex County's Section 8 Program there are two people who have such an aid in housing assistance in Plainsboro. The location of these residences is unknown.

Item 44-a:

The Linpro treatment plant has a capacity of 1,500,000 gal/day and the interceptors go through the Princeton Meadows

development. The unutilized treatment capacity is approximately 400,000 gal, most of which is committed to the completion of the PCD development and sewerage the older moderate income Village Area of Plainsboro Township. Some capacity in the area of approximately 100,000 gal beyond that amount is available.

The growth portion of Plainsboro Township west of the railroad is partly sewerage by a sewer franchise extension of South Brunswick Township into the Stony Brook Regional Sewer system. The discussion previously in these answers on the sewer capacity indicates those areas which have a franchise and those which do not.

Item 45:

There is no plan under consideration to increase capacity of public sewers other than the construction of public sewers in the older Village Area to serve the existing residences in that area.

Item 46:

There is no planned increased capacity. The geographical area to be served includes only those areas which are already built up. This entire project is required to remedy public health hazards. The estimated cost of the hookup within the Linpro system is \$1,400/residential unit. It is anticipated that this extension will be into construction during 1984. This has not received agency approvals. The plan will be funded through an assessment ordinance of Plainsboro Township. Property owners will be assessed. New Development Block Grant funding has been approved for a portion of the cost. All documents pertaining in whole or part to the plan are available at the Municipal Center, 641 Plainsboro Road, Plainsboro, New Jersey.

Item 47:

There is a package treatment plant owned by Linpro Company which serves the Princeton Meadows PCD.

Item 48:

The owner is Linpro Company, Plainsboro, New Jersey. The plant has been in operation since 1971. The plant currently serves approximately 4,500 residences, a small shopping center owned by Linpro Company, and a small professional office complex owned by Linpro Company. Total capacity

is 1,500,000 gal/day. To our knowledge there are no failures in the system, although there have been some odor problems within the last two years.

Item 49:

Public water is supplied by Elizabethtown Water, and there is adequate water service to supply the entire municipality. There are no specific plans to extend water lines to any location. Water line extensions by policy of Elizabethtown Water Company are done by the developer.

Item 50:

Answered in Item 49.

Item 51:

There are no other plans for construction or extension of infrastructure or municipal services.

Item 52:

Expert witnesses to testify on behalf of Plainsboro Township will be:

George Raymond; Raymond, Parish, Pine, & Weiner
621 Alexander Road, Princeton, NJ 08540

Item 53-a:

George Raymond is an expert in housing and planning. Mr. Raymond has been involved in numerous activities regarding Urban League and Mt. Laurel issues including having been the court-appointed master in the Bedminister case.

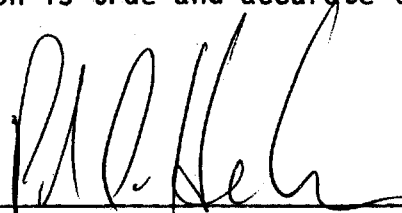
The attorney will be Joseph Stonaker, Leigh Avenue, Princeton, NJ 08540.

Item 54:

The opinions expressed by expert witnesses will be those as outlined in this answer.

I certify that the above information is true and accurate to the best of my knowledge:

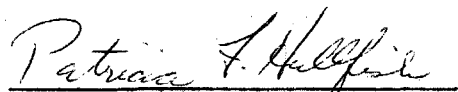
SIGNED BY:



Peter I. Hechenbleikner,
Township Administrator
Township of Plainsboro, New Jersey

NOTARIZED:

February 8, 1984



Notary Public of New Jersey

PATRICIA F. HULFISH
Notary Public of New Jersey
My Commission Expires Aug. 29, 1988

SEALED: