CA- Cranbury

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2/28/84

coverletter copy of Answers to interrogatories on behalf of Twp of Cranbury

CA0022249

CA002224G

SCERBO, KOBIN, LITWIN & WOLFF

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February 28, 1984

P.O. Box 736

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John M. Payne, Esq. Constitutional Litigation Clinic 15 Washington St. Newark, NJ 07102

RE: BFI, ET AL vs. CRANBURY, ET AL

Gentlemen:

Enclosed please find a copy of Answers to Interrogatories on behalf of the Township of Cranbury and the Cranbury Township Planning Board.

trong yours, Very

LAWRENCE LITWIN B

LBL: cvs Enc. SCERBO, KOBIN, LITWIN & WOLFF 10 PARK PLACE MORRISTOWN. N. J. 07960 (201) 538-4220 ATTORNEYS FOR Plaintiffs

BROWNING-FERRIS INDUSTRIES OF SOUTH JERSEY, INC., A Corporation of the State of New Jersey, RICHCRETE CONCRETE COMPANY, A corporation of the State of New Jersey and MID_ STATE FILIGREE SYSTEMS, INC., a Corporation of the State of New Jersey Plaintiffs SUPERIOR COURT OF NEW JERSEY LAW DIVISION MIDDLESEX COUNTY

Docket No. L 058046-83 P.W.

CIVIL ACTION

INTERROGATORIES

vs.

CRANBURY TOWNSHIP PLANNING BOARD AND THE TOWNSHIP OF CRANBURY, Defendants

TO: William Moran, Esq. South River Road Cranbury, NJ 08512

Demand is hereby made that the defendants provide

ceritifed Answers to the following Interrogatories in accordance with Rules of Court.

BY:

SCERBO, KOBIN, LITWIN & WOLFF Attorneys for Rlaintiffs

Dated: October 26, 1983

LAWRENCE B. LITWIN, ESQ.

PRELIMINARY DEFINITIONS AND INSTRUCTIONS

1. As used herein, the terms "you" or "defendant" shall mean the defendants in this action.

2. When used herein, the terms "Planning Board" shall mean the defendant Cranbury Township Planning Board and all agents, servants and other acting on its behalf.

3. When used herein the term "Township Committee" shall mean the defendant Township Committee of the Township of Cranbury.

4. When used herein, the terms "document" and "writing" includes the original or copy of correspondence, records, charts, contracts, agreements, calendars, diaries, memoranda, notes, letters, telegrams, studies, instructions, pamphlets, brochures, inter and intra-office communications, transcripts, tapes, recordings of any kind, checks, checkbooks, requisitions, vouchers, bill invoices, journals, ledgers, bankbooks, bank statements, time sheets or any other writing of any kind or description whatsoever, including original documents and copies where applicable (and any non-identical copy, whether different from the original because of handwritten notes or underlining on the copy or otherwise), relating to the subject matter of this litigation, in the possession or control of defendant, its agent, servants, employees and all other persons acting or purporting to act in their behalf.

5. The terms "identify" or "identity" when used in reference to an individual person means to state his full name, age, and present address. "Identify" or "identity" when used in reference to a document means to state the date and author, type of document (e.g. letter, memoranda, telegram, etc.) or some other means of identifying it, and its present location or custodian. If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it. 6. Whenever an interrogatory asks for the description of a document, it is the intention that the answer shall state the date of such document; the general nature or description and the subject matter of such document; the name of each person to whom such document was addressed; and the name of the person having possession, custody or control of such document.

7. The term "person" as used herein shall include natural persons, firms, associations and corporation, and whenever a request is made herein for the name of a person, it is the intention that the answer shall also state his or its address.

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8. The term "representative" as used herein shall mean and include any and all officers, directors, agents, employees, partners, attorneys and consultants.

9. With respect to any of the following interrogatories or parts thereof, as to which you, after answering, acquire additional knowledge or information, the undersigned requests that you serve supplemental answers (containing said additional knowledge or information) on the undersigned within thirty days after acquiring such additional knowledge or information. 1. Identify all persons whom you believe have knowledge of facts relating to this case and briefly summarize the area of knowledge you believe each such person possesses. All members of the Cranbury Township Planning Board, All members of the Cranbury Township Committee, Georgea von Lutcken, Secretary Cranbury Township Planning Board, all with knowledge of procedures and reasons for the adoption of the Land Use Plan and Zoning Ordinance.

Experts indicated below: Thomas March and Gerald Lenaz - Planning information concerning adoption of Land Use Ordinance and Master Plan. Various officers of the various plaintiffs.

1.1.1

2. Identify each person whom you expect to call as an expert witness at trial and set forth the following with respect to each such person: A) his precise undertaking with respect to this case and the subject matter on which he is expected to testify; B) the substance of the facts and opinions on which the expert is expected to testify; C) a summary of the grounds for each opinion to which he is expected to testify; D) the precise manner and amount of compensation to be paid to said expert; E) the date when said expert was first consulted; F) the date when said expert was first retained; G) attach copies of any written reports rendered by each expert witness; if no written report has been rendered to you, please provide a complete summary of any oral reports given to you by said expert witnesses; H) attach all correspondence between you and said expert respecting this case.

George Raymond:

A. To provide planning testimony concerning the validity of the Cranbury Township Zoning Ordinance as it applies to plaintiff's lands.

B. He will testify that the zoning ordinance is a reasonable exercise of the police power applied to plaintiff's lands and that plaintiff's land is zones as part of a reasonable comprehensive scheme.

C. See Cranbury Township Land Use Plan.

D. Based upon annual retainer agreement as Cranbury Township Planning Consultants.

E. 1981

F. 1981

G. See the Cranbury Township Master Plan and Land Use Ordinance

H. Work Product

Ronald A. Curini:

A. To provide testimony concerning the value of transfer of development credits and real estate in the preservation and receptor zones. B. He will testify that the value of the land will not be adversely affected by TDC.

C. His knowledge of real estate in the area.

D. Hourly rate

E. January 1984

- F. January 1984
- G. See B above

H. Work Product

3. With respect to each expert listed in answer to interrogatory #2 above, state whether he has had a formal education or training in his field of expertise. If so, state: A) the name and address of each institution where he received such special education or training; B) the dates when he attended each institution; C) the name or description of each degree he received, including the date when each was awarded and the name of the institution awarding it; D) did he have other specialized training in his field? If so state (i) the type of training; (ii) the name and address of the institution or source of such training; and (iii) the dates when he received this training.

Resume of George Raymond attached hereto. Others to be provided.

4. For each expert listed in answer to interrogatory #2 above, state whether he is a member of a professional organization or trade association. If so, state A) the name of each professional organization or trade association; B) the requirements for membership; C) the dates of membership; and D) a description of each office he has held in each such organization or association.

See answer to No. 3 above

5. For each expert listed in answer to interrogatory #2 above, state whether he has written any books, papers or articles on any subject related to his alleged area of expertise in this case. If so, for each book, paper or article, state: A) the title and subject matter; B) the name and address of the publisher; C) the proper citation, including the date of the publication.

See No. 3 above

6. For each expert listed in answer to interrogatory #2 above, state whether he has practices or worked in his field during the past five (5) years. If so, state: A) whether he was self-employed; employed by someone else or associated as a partner; B) each address where he practiced or where he ws employed; C) the dates he was with each employer; D) the type of duties he performed with each employer.

George Raymond:

A. Partner, Raymond, Parish, Pine & Weiner

- B. Princeton, NJ, Tarrytown, New York
- C. Last five years
- D. Planner

Ronald A. Curini:

- A. Self employed
- B. Trenton, N.J.
- C. Last five years
- D. Real estate appraisal

7. For each expert listed in answer to interrogatory #2 above, who has not practiced or worked in his field during the past five years, set forth the nature and description of his employment during this period.

N/A

8. For each expert listed in answer to interrogatory #2 above, set forth precisely all other facts upon which you will rely to qualify this person as an expert in this case.

See # 3

9. State whether each expert listed in answer to interrogatory #2 above has testified in any court within the last 10 year as an expert witness on a subject in any way related to the subject matter of the within action. If so, identify the following: A) the court in which he testified; B) the name and docket number of the case in which he testified; C) a brief description of the underlying facts as to each case in which he restified; D) the sum and substance of the testimony which he offered.

See #3

additional material to voluminous to provide

10. With respect to each expert listed in answer to interrogatory #2 above, state whether he has failed to qualify as an expert witness in any court proceeding in the last two years. If so, identify the following: A) the court in which he attempted to testify; B) the name and docket number of the case in which he attempted to testify; C) a brief description of the underlying facts of the case; D) an explanation of why he failed to qualify as an expert.

No.

11. State the name of any expert witness consulted by defendant who will not be used at trial.

N/A

12. Has any admission been made by any of the parties to this action concerning the subject matter hereof?

No.

13. If the answer to the above is affirmative, set forth A) the date and place of each admission; B) the substance of each admission; C) the name and address of each person making an admission; D) the name and address of the person to whom each admission was made; E) the names and addresses of all persons present when each admission was made or having knowledge thereof; F) identify all writings evidencing same.

N/A

14. If you intend to rely upon any written documents to establish your defenses to this action, append hereto a copy of the same.

We intend to rely on all reports prepared by all experts for all parites to the case as applicable; and copies of the New Jersey State Department Guide Plan, proposed amendment thereto, Cranbury Township Master Plan and Zoning Ordinance. See attached.

15. Set forth, in detail, all facts which you contend form the basis of the defenses to this action.

The facts set forth in the Township Master Plan, which demonstrate that plaintiff's property is zoned as part of a reasonable comprehensive scheme.

15. Identify any persons who have given any written statement relating to this case. Annex a copy of each hereto.

All experts of all parties - copies already provided directly or will be.

16. Set forth the date upon which the defendant answers these interrogatories Various dates in January and February 1984

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17. Identify all persons supplying information for the answers to these interrogatories. Thomas March, Gerald Lenaz, George Raymond, Ronald Curini, and counsel for defendant. 18. State the names and addresses of all persons who have any knowledge of any relevant facts relating to this case.

See answer to No. 1. Addresses of specific individuals will be provided on request.

19. Set forth, in detail, all conversations between the parties to this action, their agents, servants, employees and representatives concerning the subject matter thereof, indicating A) the date and place of each conversation; B) the parties to each conversation; C) substance of each conversation; D) the purpose of the conversation.

Impossible to set forth in the detail requested. The TDC scheme was discussed at literally hundreds of conversations between 1978 and 1983.

20. Please set forth in detail the basis upon which the Cranbury Township Land Use Plan ("Land Use Plan") and the Cranbury Township Zoning Ordinance ("Zoning Ordinance") concluded that plaintiffs' property should be zoned light impact industrial?

The plaintiff's land is presently developed as an industrial use. The present land use plan and zoning for light impact industrial provide for a variety of industrial uses. The Township's policy is to encourage industrial uses only near N.J. Turnpike Exit 8A and East of the railroad and New Jersey Turnpike. Exceptions were made only where industrial use already existed.

21. Please set forth in detail the reasons why the Zoning Ordinance and the Land Use Plan did not conclude that plaintiffs' properties (which have been used for a substantial period of time as heavy industrial uses) should not be zoned as conforming uses or conditional uses?

Richcrete and Mid State Filigree have been granted use variances. Browning Ferris was a non conforminguse under the previous Industrial Zone. The properties were not classified as heavy industrial use, because it would be a spot zone. The Light Industrial Zone does not have provision for heavy industrial because of the Township's continuing policy of discouraging such uses in this location.

22. Please set forth in detail the basis upon which the Land Use Plan, and the Zoning Ordinance concluded that the Johns Mansville Property which adjoins plaintiff's property be zoned light impact industrial.

The Johns Mansville property is zoned Light Impact Residential.

23. Aren't industrial users and residential users in close proximity in consistent land uses? If not, why not?

The plaintiff's properties are separated from the adjoining residential zone by a wooded buffer. The residential use is low density. The three acre minimum lot requirement provides ample opportunity for additional buffers on the adjoining residential lots. The juxtaposition of such uses is not necessarily inconsistent.

24. Please set forth, in detail, the Township Committee's total housing obligation pursuant to South Brulington County NAACP v. Mt. Laurel Twp., 92 NJ 158.

Presently under review.

25. Can the Township Committee meet its Mt. Laurel housing obligations without transfer development credits? If so, please detail the reasons therefor.

The Township's housing obligation is presently under review.

26. Attach hereto copies of all notices of Master Plan hearings held by the defendant Planning Board.

N/A

27. Please set forth the basis in detail upon which the Land Use Plan and the Zoning ordinance concluded that the lands west and north of the plaintiff's property be zoned light impact industrial?

North and west property is zoned Light Impact Residential.

28. Identify by date all meetings, hearings, discussions or conversations, whether public or non-public at which the matter of land use designation for lands in the Brick Yard Road area was discussed.

Impossible to answer. See answer to No. 19.

29. Please identify and provide all written documents evidencing or touching upon land use/zoning district classifications for the Brick Yard Road area.

Refer to the Land Use Plan.

30. Please set forth and provided any studies that support the feasibility of development of single-family homes on three-acre lots in the Brick Yard Road/U.S. Route 130 area.

Refer to Land Use Plan.

31. Please provide what price of such homes would be in 1983 dollars.

No attempt was made to determine such price.

32. Please indicate the sound planning principals which were considered in the decision to provide for the construction of single-family homes on 3-acre lots adjacent to plaintiff's properties.

The Township reduced the excessive amount of industrial land zoned within the Township, including the adjacent area.

The three acre zone adjacent to the plaintiff's properties has a wooded buffer along the Light Impact Industrial Zone boundary. Almost all the land south of Brickyard Road is within the 100-year flood plain. The Township considers this to be an environmentally sensitive area and its policy is to minimize the intensity of development in such areas.

33. Please indicate the minimum distance that a single family home can be placed in the light impact residence zone from the plaintiff's property. Please set forth the section of the Zoning Ordinance which so indicates.

Section 150-19,A.

- 1. Lot area 3 acres
- 2. Frontage 250 feet
- 3. Lot depth 250 feet
- 4. Front yard 50 feet
- 5. Side yard 50 feet
- 6. Rear yard 50 feet

34. Please state whether any buffering, transition areas or similar controls exist in the Light Impact Residential zoning regulations applying to the development of single family homes on 3 acre lots. If so, set forth the sections from the Zoning Ordinance.

There are none since with 3-acre lots, the Planning Board has ample opportunity to achieve a subdivision layout which makes possible sufficient buffering on the residential side of the district boundary.

35. Please state the reasons that 3 acre lot size was established as the minimum lot requirement in the LI-R zone.

See the Land Use Plan, Page III-11 and III-12.

36. State whether the defendants contend that housing construction has not been effectively precluded in the Li-R zone in the Brick Yard Road/Route 130 area by enactment of the Zoning Ordinance. Please set forth the basis for the answer to this question.

Other adjoining communities have large lot zoning. For example, Plainsboro at 6 acres, South Brunswick at 3 acres and East Windsor at 2 acres. Further, the zoning along Brick Yard Road permits cluster residential development. Residential development as zoned is therefore deemed to be possible. 37. Please describe the nature of plaintiffs industrial activities and relate to the compatibility of the activities to single-family residential development.

Plaintiffs are involved with the production of concrete products and storage of vehicles.

A buffer between the single family residential and industrial zones exists.

38. State why the flood plain area along Indian Run Creek was not considered as the boundary line between LI-R and LI-I zoning districts in the Brick Yard Road area.

The Township sought to minimize industrial land in order to balance the relationship between residential and industrial land use. Also, much of the land between Brickyard Road and the stream is in the flood plain. Finally, some of that land is now in residential use.

39. Please indicate and identify the names of any owners of property in the Brick Yard/U.S. Route 130/Hightstown-Cranbury Station Road area that were consulted with or expressed opinions to the Planning Board during the Master Plan preparation about land use designations for the area.

None

40. Please indicate why development in the LI-R Zone in the Brick Yard area should not be restricted to a form of planned development only.

Cluster development, which is a form of planned development, is permitted in the Ll-R Zone

41. Please indicate the areas of the Township whose soil is identified as "Woodstown, Falkington, Humaquepts" or similar soil types and indicate their zone classification. Provide acreage figures for the amounts of the above soil found in each zone district.

Refer to the Land Use Plan, page II-16 for the soil classifications of lands throughout the Township. The Township has not performed a classification using the above types.

42. Please indicate the zoning of lands located east of the New Jersey Turnpike in both Cranbury and Monroe Townshp in proximity to the Brick Yard Road area. Light Impact Industrial in Cranbury and light Industrial in Monroe. 43. Please indicate if the development of these lands and related impacts was considered when establishing LI-R zoning for the Brick Yard Road area.

Yes.

44. Please indicate why the public sewer system cannot be extended to serve the LI-R zoned area along Rt. 130 and Brick Yard Road.

The designed capacity of the present sewer system is only capable of serving the area surrounding Brainerd Lake. The area in question is two ridge lines removed from the existing service area (see Plate II-3 following page II-21 in the Land Use Plan.)

45. Inasmuch as the Master Plan indicates that at full development Cranbury cannot provide housing to serve anticipated employment in the Township and indicates that this housing will be provided within other communities within the region, please indicate the communities expected to provide the needed housing and the number of units to be provided.

The Land Use Plan does make provision for housing sufficient to accommodate a number of households equal to the anticipated employment in the Township at the lowest intensity of development likely to occur. (pp. III-21, 22). The Plan also indicates that, "should the statutorily required future reviews...show the emergency of any serious imbalance between jobs and housing", the Township should adjust land allocations and densities as needed (p. III-22.) 46. Please indicate the maximum number of low and moderate cost units that can be developed in Cranbury under the provisions of the Zoning Ordinance.

Approximately 400 units

47. Please indicate the number of low and moderate units that would be considered as Cranbury's "fair-share" under Mt. Laurell analysis.

This is presently under review

48. Please indicate the function of Brick Y and Road as it relates to Cranbury's roadway circulation system.

Arterial road.

49. Please indicate the classification of the Route 130/Brick Yard Road area in the New Jersey State Development Guide Plan.

Growth area

50. Please indicate the nature and intensity of use of the Brick Yard Road/Route 130 area as classified in the State Development Guide Plan.

In general, the SDAP recommends residential densities of not less than two dwellings per acre in growth areas. For the area south of Brick Yard Road, see answer to questions Nos. 32 and 34. The area north of Brick Yard Road is also characterized by flood plains and a high water table. Due to absence of sewers and public water, cluster development is permitted at a density of only one unit per acre.

51. State whether the defendants have, by establishing the 3-acre residential zone in the Brick yard Road - U.S. Route 130 area, attempted to either:

A. Preclude growth; or

B. Time or phase growth in Cranbury Township

A. No

B. No

52. If the defendants are seeking to time or phase growth:

A. Set forth in exact detail the guidelines and provisions of any such timed or phased growth plan;

B. The authority upon which the right to time or phase growth is premised;

C. The length of time that such a time or phased growth is intended to be in effect; if such a plan has been reduced to writing or any writing exist which are related to such a plan, provided copies of same.

N/A

53. State whether the Zoning Ordinance provides for a well balanced community and, if so described in detail the factual basis for the conclusion.

Refer to the Land Use Plan, especia-ly pp. III-19 ff

54. Set forth the demographic breakdown of Cranbury Township, including specifically but not limited to:

The number and percentage of households with annual income levels of: Α. Number of Households Percent(rounded) 1. less than \$10,000 105 15 2. between \$10,000 and \$15,000 62 9 between \$15,000 and \$20,000 3. 75 11 between \$20,000 and \$25,000 4. 98 14 between \$25,000 and \$35,000 5. 128 18 6. between \$35,000 and \$50,000 130 19 7. between \$50,000 and \$100,000) 103 15 8. over \$100,000)

B. The number and percentage of the Township's population that are minorities, broken down by specific minority group.

	Number	Percent
Total population	1,927	100
Black	168	8.7
Asian and Pacific Islander	5	0.3
Other	11	0.6
Spanish	19	1.0

and the state of the

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by proposed witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

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.

Dated:

Mary

MIDDLESF & COUNTY PLANNIN' BUAKD

40 LIVINGSTON AVENUE NEW BRUNSWICK, NEW JERSEY 08901 (201) 745-3062

MEMBERS HYMAN CENTER, Chairman SIDNEY SEWITCH, Vice Chairman STEPHEN J. CAPESTRO, Freeholder Director DAVID B. CRABIEL, Freeholder JOHN J. REISER, JR., County Engineer JOHN J. BERNAT, JR. DENNIS J. CREMINS LOUIS A. GARLATTI WALTER L. WILSON



DOUGLAS V. OPALSKI Director of County Planning

> FRANK J. RUBIN Counsel

RHODA HYMAN Secretary

August 14, 1981

Mayor Thomas P. Weidner Township of Cranbury 28 North Main Street Cranbury, N.J. 08512

Dear Tom:

Enclosed is the latest revision of the N.J. State Development Guide Plan map for Middlesex County. Note that it includes that portion of Cranbury west of the village, and is in complete accord with our request to NJDCA earlier this year. I believe it also is in accord with your thinking.

Note that this map is not "official" since the Guide Plan still has not been adopted, endorsed or anything else by the Governor. However, it's the best evidence we have right now of possible eventual State policy support to preserve that area now under so much discussion in Cranbury.

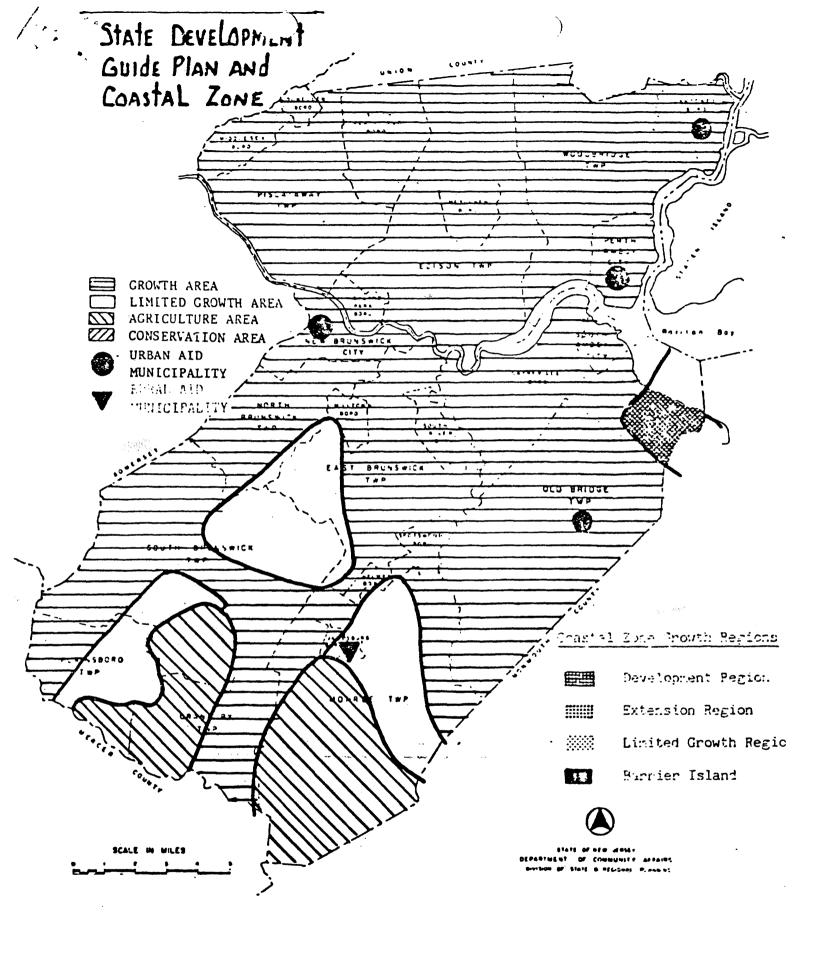
I had a nice chat with Tom March the other day re: Cranbury's progress. Let me know if there's anthing we can do.

Sincerely yours,

nn A. Sully

Comprehensive Planning

JAS:tn Enclosures cc: Tom March, Raymond, Parish, Pine, & Weiner



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Staff

GEORGE M. RAYMOND President Since founding the firm in 1954 Mr. Raymond has supervised hundreds of projects, including comprehensive community plans, land use analyses, zoning ordinances, urban renewal and community development projects, research studies, policy analyses, housing studies, and environmental assessments. He was principal in charge of such major studies as the community renewal program for New York City; The Role of Local Government in New Community Development, for the U.S. Department of Housing and Urban Development; a study for the New York State Department of Environmental Conservation of measures to safeguard the Hudson River Valley; a Coastal Management Program for the City of New Rochelle; and development planning for the South Bronx Revitalization Program.

Mr. Raymond was professor of planning and chairman of the Department of City and Regional Planning in the School of Architecture at Pratt Institute from 1958 to 1975. During that time he founded and directed the Pratt Center for Community and Environmental Development and was founding editor of Pratt Planning Papers. He was also co-editor of the Pratt Guide to Housing, Planning and Urban Renewal.

He has been an expert witness in numerous zoning adjudications. As court-appointed master in the 10-year-long Township of Bedminster v. Allan-Deane Corporation exclusionary zoning case in New Jersey, he helped implement a complex court order to the expressed satisfaction of the town, the developer and the court.

Mr. Raymond earned his architectural degree at Columbia University, where he was awarded the Sherman Prize and the medal of the American Institute of Architects.

He has contributed articles to Encyclopedia Americana, The New York Times, Commentary, Journal of the American Institute of Planners, Zoning and Planning Law Report, Journal of Housing, Practicing Planner, Traffic Quarterly, American City, Urban Lawyer, Urban Land, Amicus Journal, and other journals. He is a contributor to Urban Planning in Transition, Ernest Erber, Ed.,; Planning Theory in the '80's, Burchell & Sternlieb, Eds.; The Land Use Awakening: Zoning Law in the Seventies, Freilich & Stuhler, eds.; etc.



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Staff

George Raymond	Mr. Raymond's current offices include
(continued)	President, New York Metropolitan Chapter, American
	Planning Association;
	Member, Mayor's Commission on Developer Commitments in New York City;
	Vice president, Citizens' Housing and Planning
	Council of New York;
	Director and past vice president, Federated
	Conservationists of Westchester County, Inc.;
	Director and past vice president, Council for the
	Arts in Westchester;
	Director, Phipps Houses;
	Director, Wave Hill Environmental Education Center;
	Member, editorial advisory board, Journal of the
	American Planning Association;
	Member, editorial board, Socio-Economic Planning
	Sciences; and
	Member, Citizens Advisory Committee to the
	commissioner of New York City's Department of
	Housing Preservation and Development.
	He is a past president of the American Society of
	Consulting Planners, Association of Collegiate Schools
	of Planning, the Metropolitan Committee for Planning,
290 -	Westchester Citizens Housing Council, Inc., and
	Westchester Residential Opportunities, Inc. He has
	also served as
	Member, Advisory Committee on Higher Education to
	the U.S. Department of Housing and Urban Develop- ment;
	Director, National Committee Against Discrimination
	in Housing;
	Director, Settlement Housing Fund; and
	Chairman, legislative committee, New York Metro-
	politan Chapter, American Institute of Planners.
	Mr. Raymond is a member of the American Institute of
	Certified Planners of the American Planning Associ-
	ation, American Institute of Architects, National
	Association of Housing and Redevelopment Officials,
	Urban Land Institute, Municipal Art Society, National
	Society of Environmental Professionals, New Jersey
	Society of Professional Planners, Sierra Club, and the
	Catskill Center.
	A licensed professional planner in New Jersey, he is
	listed in Who's Who in America and in Outstanding
	American Educators.