

PINELANDS DEVELOPMENT CREDIT
EVALUATION REPORT

Undertaken for the
Pinelands Commission
by Karl Kehde
November, 1987

INTRODUCTION

This report results from a contract between the investigator and the New Jersey Pinelands Commission supported by a grant from the Fund for New Jersey

Under the terms of the contract the investigator was required to conduct a series of interviews with developers, attorneys, realtors, municipal officials and landowners to ascertain individual knowledge and perceptions of the Pinelands Development Credit Program. Additionally, the investigator was to attempt to identify potential demonstration projects that may involve the use of Pinelands Development Credits (PDCs). Finally, the investigator, based upon the interview process, was to prepare this report, submit recommendations to improve public knowledge concerning the program, and recommendations to resolve weaknesses identified during the course of the analysis.

It should be stated for the benefit of the users of this document that the analysis conducted by the investigator was very limited in its scope. This report should not be viewed as a detailed evaluation of all facets of the PDC program. Rather, it is merely a gathering of the perceptions of a sampling of those who own or may use PDCs, or who

make decisions in the context of the PDC program. These perceptions have additionally been tempered by the perceptions of the investigator who benefited from the cumulative responses of interviewees. As will be noted in a later section of the report more detailed analysis is required before meaningful conclusions can be drawn regarding the future viability of PDCs.

The PDC Program - A Brief Description

The Pinelands Development Credit Program is a component of the New Jersey Pinelands Comprehensive Management Plan. It was designed by the Pinelands Commission in the closing months of the Plan's development to achieve two purposes. The Commission recognized that development opportunities were to be limited in both the Preservation Area and Agricultural Production Areas. In contrast development opportunities were to be encouraged in Regional Growth Areas. This action by a public agency was expected to limit the development expectations of some while increasing the development potential, and therefore, the profit potential of others. The first objective of the program was to recapture some of the increased value and to share it with property owners in more restrictive areas.

Secondly, the program provided a vehicle for the permanent protection of Agricultural and Preservation Area properties since once a credit is used a deed restriction is placed upon the originating property. It also provided the financial incentive for implementation.

As a variation on the Transfer of Development Rights concept, the Pinelands model is unique mainly because it is regional in scope. Here, property owners in areas restricted from development receive credits (severable development

rights) according to a formula devised to recognize differences in value between uplands and lowlands. Bonus credits are afforded to agricultural landowners. These credits may be sold to users in Regional Growth Areas who are then entitled to increased development densities. The increased entitlement is based upon provisions contained in local zoning ordinances and may vary according to zoning district.

Credits may be sold in private transactions between a holder and a builder. They may also be sold through two public entities which may be viewed as "PDC brokers." A county bank, the Burlington County Conservation Easement and Pinelands Development Credit Exchange Board, purchases credits in that county. A state operated Pinelands Development Credit Bank is now beginning operation. The latter can purchase credits throughout the Pinelands. Both agencies may sell credits to interested users in all Regional Growth Areas.

Use of credits by developers is entirely optional. Therefore, a decision to purchase credits must be based upon a clear financial incentive. To date, limited use of credits has occurred both for single and multi-family projects. No large transactions have yet been realized. However, according to Pinelands Commission accounting several projects in the approval or planning stages will require the substantial use of PDCs.

While the PDC program has been in effect since the Pinelands Plan was adopted in 1981, the program is dependent to some extent on the certainty of local zoning ordinance provisions which contain the entitlement to increased density. These ordinances, particularly in larger user locations, are being or have only recently been enacted. As such, the PDC program must be viewed as a relatively new "working program" under the Comprehensive Management Plan.

The Interview Process

Interviews between the investigator and a variety of persons representing categories of interests involved in potential PDC transactions were conducted during the course of this investigation. The categories were developed in consultation with Pinelands Commission staff, as were the names of interviewees. Additional names were also solicited from individuals in the course of the interviews.

The categories established included large landholders, active developers, municipal officials and realtors. Additionally, a number of attorneys who represent applicants, municipal utility authority officials, and a representative of the Burlington County PDC Bank were interviewed. A listing of the interviewees is contained in Appendix A of this report.

A questionnaire was also developed in consultation with Commission staff to provide a framework for the interview. This is attached as Appendix B. The questionnaire was pre-tested on selected interviewees prior to being utilized with the larger list of individuals. While the questionnaire served as the basis for discussion, the interview often turned into a discussion of a wide range of topics related to current development projects, the Comprehensive Management Plan, development philosophies, and the

development review process of the Pinelands Commission. Where these other comments are relevant they are noted in this report.

Contact with the interviewee was predominately made by telephone and the interview was conducted in the individual's office or another convenient location. The average length of interviews was more than two hours. Where potential demonstration projects were identified, additional contact was made, and a site visit conducted in some cases.

Interview Results

The first purpose of the interview questionnaire was to assess the interviewee's knowledge of the PDC program and to identify the least understood facets.

Most of the interviewees in all categories were aware of the PDC program and could generally discuss the program in relation to their specific circumstances. Members of the development community who had actually used PDCs were, of course, more familiar with the acquisition, transfer, and other procedural elements of the program. Other members of the development community who have active development projects in the Pinelands appeared to know enough about the program to discuss why use of credits was or was not considered to be feasible in the projects they were currently involved in. Since a number of attorneys and realtors were also developers, or were familiar with the Comprehensive Management Plan and the development review process, they too, were generally familiar with the PDC program. Landowners were aware that they were the recipients of credits and knew that there were both private and public avenues for their sale. Municipal planning board officials also expressed familiarity with the program as it related to their local zoning ordinances and the fact that the program is regional in scope. In the instances where the interviewee did not indicate a general enough understanding of the

program the investigator provided information to elicit further comments.

The questionnaire was also designed to determine the least understood facets of the PDC program. It is obvious to the investigator, based upon the interviews, that few understand the details or the procedural elements of the program. Of primary importance is the fact that the purpose of the program is not clearly understood by the persons interviewed. Most view the program as a method to compensate landowners who are not allowed to develop properties in restrictive areas of the Pinelands. This perception of the reason for the program in turn, often focus the discussion on the adequacy of the compensation rather than on the elements of the program itself. This is particularly the case with landowners who hold or are eligible for PDCs.

Few of the interviewees were familiar with the details of the program including the method of allocation or the formula for use of credits. A lack of knowledge was also evident about the procedures necessary to transfer credits including the need for a Letter of Interpretation, title work, deed restrictions, deed transfer, credit transfer at time of use, etc. Very simply stated, the mechanics of the PDC program are generally, if not totally, outside of the knowledge of all but the few who have actually undertaken projects utilizing PDCs. Based upon the interviews one must

conclude that very little is known regarding the operation or the intent of the PDC program. Instead, there is among the interviewees a general knowledge of the program which in the minds of the development community is the current basis to make a decision relating to an individual project.

The third area of interest is the perception of the landowners and the development community as to whether the PDC program is financially profitable. In the case of the landowners this becomes in reality a question of how much the PDC will command in the market place. Since the landowners interviewed view the PDC program as a compensation device, they expressed the opinion that PDCs were inadequate compensation for the loss of their previous development rights.

Builders on the other hand generally expressed the view that PDCs could be financially profitable under the right set of circumstances in their projects. Those who have active development projects underway indicated for a variety of reasons which will be addressed in a later section, that PDC usage was not feasible in the present projects. Of important interest was the response of developers that had actually used PDCs in recent developments. These indicated that they would be receptive to the use of PDCs in the future.

Developers generally agreed that the increased density that results from PDCs can make sense from the profit motivated standpoint. They cautioned, however, that the profitability is impacted by the cost of PDCs, the market for type and mix of development, on-site development constraints that serve to limit density, and most important, the amount of "hassle" involved in the development application process at Commission and local levels. The latter relates to the perception that PDCs may involve more problems than the investment is worth. This will be covered in more detail when this report addresses weaknesses in the program.

All interviewees were asked to express their opinion on what is best about the PDC program. Other than developers who perceived some potential in the program for increased profits, the general consensus was that the major strength of the program is its potential to provide some level of compensation to landowners. Again, this follows the widely held perception that this was the true objective of the Commission in the design of the PDC program.

Weaknesses in the program received much more attention by the interviewees. Of interest to the investigator is that comments regarding the weaknesses of the PDC program often were related to the interviewee's perception of the Comprehensive Management Plan and the Commission itself. Since the PDC program is an element of the Comprehensive Management Plan, interviewees often spoke of the PDC program

after or in concert with their perceptions of the Plan. Many interviewees expressed with emotion the impact of the Plan on their individual circumstances. Most felt that the Plan's impact had been negative. This was true of landowners who discussed the loss of development potential, developers confronted with strong regulations and a new development review process, and from municipal officials who expressed a desire for more or less growth. Many of the weaknesses cited are not necessarily weaknesses of the program itself. Rather, they place the program in the light of other issues affecting development.

The Perception of Density

Developers often cited density as an issue of concern. This was sometimes because some types of marketable development, particularly adult communities, can be realized within the base density provided by local ordinances. This is particularly true in areas where Pinelands Plan densities are highest such as Ocean and Atlantic Counties. It however, is not the case in other areas of the Pinelands such as Burlington and Camden Counties where typical PDC densities may be less than four units per acre. It also is not true for many zoning districts in the higher density Regional Growth Areas.

Developers indicate that there is a general anti-development atmosphere in many communities, particularly among the public that makes the approval process more difficult when PDC's are used. Some townships, they indicate, do not want increased density. In one case, an individual related that residents complained that a neighboring development would become a ghetto if PDCs were used. Another stated that neighbors everywhere are fighting increased density.

Township planning board officials in one interview also expressed a concern regarding density. One official stated that PDCs would be approved for use "over my dead body." This official felt strongly that the Plan had assigned too much growth to his municipality and PDCs were an intolerable addition no matter what the level of increase may be.

Lack of Sewers

In most areas of the Pinelands where PDCs may be utilized the lack of adequate sewage treatment facilities was identified as a weakness. This is particularly true in areas like Camden County where density concerns appear to be less of an impediment. Sewers may also become important for PDC usage as available land becomes constrained. The presence of sewers in an area of declining developable land

may promote, considerably, the use of PDCs to address continued market demand.

Local Zoning Restrictions

Along with the concern of developers regarding local receptiveness to higher densities is the belief that many local ordinance provisions will severely limit the realistic use of PDCs. Included among these are height limitations, bulk standards, open space requirements and other non environmentally related standards. These standards at the site planning stage may actually preclude the achievement of PDC densities on parcels that otherwise would be suitable for their use.

Environmental Constraints

Developers voiced the concern that environmental standards of the Pinelands Plan may also inhibit full use of PDCs on a parcel. Of particular importance are wetland and wetland buffer standards. Again, at the site planning stage these factors coupled with other local ordinance provisions may work against the program.

Program Complexity

Many of the individuals interviewed from each category expressed the opinion that the PDC program is complex and difficult to fully understand. As stated previously, while general knowledge was expressed by most interviewees, the details were not known. This lack of knowledge may lead to a perception of complexity. It is interesting to note again, that those who have actually used PDCs would consider their use in future projects.

Contrasted with the feeling of complexity was a planning board member's simple statement that "it just doesn't seem fair that a developer can just buy increased density." This individual also believed that a local rather than regional transfer program would be better.

State and Local Development Review

As noted earlier "hassle" is an extra cost factor cited by the development community. This investigator believes that the amount of hassle is an important consideration in many development decisions because it can cause the approval process to be extraordinarily time consuming and costly to the developer. The generally negative attitude toward increased density fueled by adverse public reaction to development in many instances causes the approving agencies

to hassle the developer more when additional PDC densities are requested.

The lack of sewage treatment facilities appropriate for the higher PDC densities requires the developer to invest in the design and presentation of alternative systems which may or may not be approved after months or years of evaluation by approving authorities.

Local zoning impediments to higher density (thus PDC use), environmental or otherwise, provide a legal basis for denying a developer's request to use PDC's in a given project.

Both state and local review and approval is required for development applications in the Pinelands jurisdiction. More information is required than in "outside" towns. All agencies must review and approve each change required by another agency. Confusion, inefficiency and delay can significantly increase the time and expense required by the developer to gain the necessary approvals for a project in the Pinelands. Thus, many developers prefer to work outside the Pinelands and may not use PDC's in the Pinelands, in spite of the additional profit potential, because they perceive one more layer of complication and expense in the approval process.

Demonstration Projects

As part of the investigator's scope of services, he was to attempt to identify potential demonstration projects that either could be begun during the course of the contract or which showed promise in the longer term.

The following is a listing of projects that were explored. A brief description of the project and its potential for further development is included.

Project #1 200+ acres in Medford Township

No plan or application exists as yet for this site. The site is well located in a sewerred growth area. It has significant amount of wetlands which have not yet been delineated. It could be a beautiful, highly visible, mixed use project using about 25 PDC's. However, after many discussions with the owners and their consultants, they remained nervous about the Pinelands review and the wetlands, and they decided to wait for awhile. The project still has excellent potential to demonstrate the use of PDC's, provided the wetlands don't severely limit the amount of developable land.

Project #2 70+ acres in Winslow Township

No plan or application exists as yet for this site. It is in an unsewerred growth area. The owner is unfamiliar

with development and PDC's. The land is high and dry, surrounded by development on one acre lots. Since no sewer is available, there is little interest in development at the higher PDC densities. If and when sewer service is available the project may become a viable demonstration.

Project #3 160+ acres in Egg Harbor Township

This is an approved project for 450 homes and will use about 20 PDC's. However, the homes requiring the PDC's will not be built until 1989, assuming a good economy. The developer does not need the PDC's until then. He may be interested in purchasing some options on PDC's now.

Project #4 40+ acres in Pemberton Township

This site is highly visible in a sewerred growth area. It has some wetlands which are being delineated. It could yield a beautiful residential project using about 20 PDC's. The developer is unsure about a marketable concept for the property. He is getting all kinds of advice. He is nervous about the Pinelands review and the wetlands. A conceptual site plan has not been done as yet.

Recommendations

The Pinelands Development Credit Program must be viewed as being very much in the infancy stage. As stated previously, while it has been in effect as part of the Comprehensive Management Plan since 1981, it in reality has only been "on the street" for a short period of time. Some limited transfers have occurred and those interviewed who have been involved in the resulting development had a favorable experience. As the Commission's accounting indicates, larger numbers of transfers are nearing the development stage. This investigator believes that it is too early to judge whether the PDC program will become a viable component of the Comprehensive Management Plan. Based upon the interviews, however, he believes that the program can with proper support, become a successful contribution to the Pinelands effort. To do this, however, current negative perceptions and clear misunderstandings must be addressed.

The recommendations that follow are designed first to address perceptions, second to provide short-term assistance to the program, and third, to provide a longer term relationship between the PDC program and development in Regional Growth Areas.

Recommendation #1 PDC Education

It is obvious from the interviews that the public may have a general awareness of the PDC program. It is obvious, too, that it does not understand why the program is in effect or the details of its implementation. The Commission should undertake an effort to better explain the PDC program and its implementation to owners, users, and local officials. It also must reach those on the periphery of the development process including realtors, engineers, planners, architects, surveyors and the general public that involves itself in development issues. Without a clear understanding of the program negative perceptions will only continue.

Recommendation #2 Marketing Program

The Commission should develop an aggressive marketing program among developers and real estate professionals to promote the use of PDCs. Such a program may best be designed by an outside consultant. It should minimally include material relating to the financial benefit of the program to the development community with clear examples of sample parcel costs and profit projections. This material should be followed up with meetings and workshops conducted by knowledgeable practitioners with those who may be identified as potential PDC users. As in the case of the educational effort, developer consultants should be a target for the marketing program, as well. Landowners may need sepa-

rate marketing attention which clearly identifies users of credits and even negotiating techniques to elicit market value for credits held. The Commission also should provide, or have provided, an information service to link potential users of credits with those who wish to sell. The overall marketing program should also include clear information on how to facilitate the process of PDC transfers from sale to local project approval.

Recommendation #3 Infrastructure

The Commission must take steps to facilitate the approval and construction of appropriate sewage treatment facilities in Regional Growth Areas of the Pinelands. The Commission must also attempt to work closely and cooperatively with local officials to resolve existing sewage treatment problems on a priority basis.

Recommendation #4 Local Zoning Restrictions

The Commission should undertake a review of parcels in zoning districts which permit PDCs to ascertain whether extraneous zoning regulations inhibit or disallow the use of PDCs. Where such impediments are found the Commission should aggressively pursue remedies to alleviate this problem. The Commission should also undertake a review of municipal zoning densities in an effort to determine whether adjustments in certain zone densities may be required to provide a more realistic opportunity for PDC use.

Recommendation #5 Environmental Constraints

The Commission should undertake an analysis of PDC eligible parcels to determine if Pinelands regulations themselves inhibit the achievement of PDC densities. Where such problems are found PDC density adjustments should be made and other more suitable parcels identified for lost PDC use.

Recommendation #6 Program Complexity

Within the educational program for PDC sellers, developers and planning boards, the Commission should provide clear explanations of the PDC process using verbal and visual examples. It should also assist the users of PDCs throughout the process to simplify the user's burden and to resolve problems that may arise. The Commission should also carefully review the present program to identify alternatives that may be more easily grasped by the user.

Recommendation #7 Development Review

If the Commission is to entice developers to use PDCs it must provide an efficient, streamlined and separate review process for PDC projects. These should be fast-tracked as much as possible and Commission staff must be prepared to participate in the alleviation of problems confronting the developer willing to use credits. It is the

investigator's belief that an expedited review, with Commission staff assistance will do much to alleviate developer hesitance. Combined with an aggressive marketing program the clear display of assistance by the Commission can do much toward the use of PDCs. The Commission should also consider creating a position on its staff for the purpose of facilitating such projects and to follow through with the developer as he attempts to gain local approvals.

Recommendation #8 Demonstration Projects

The Commission, either on its own initiative, or with the assistance of an interested organization, should aggressively encourage demonstration projects utilizing PDCs. The old saying "Seeing is Believing" is relevant to the PDC program. A series of well designed projects would go far in demonstrating the benefit of the PDC program to the landowners, developers and local interests. It also would do much to address the negative perception of increased density. The Commission must be prepared to work closely within the framework of its regulations with those willing to undertake initial demonstrations. Such an effort will also be a learning experience to provide the framework for a streamlined review process. The Commission should also consider establishing an independent design assistance program to work with developers on PDC projects.

Recommendation #9 The Commission must demonstrate how higher density evolution of the Growth Areas can yield an extraordinarily high quality of life for the residents.

Although this recommendation is last on the list, it is, in the investigator's opinion, the key to the success of the PDC program and to the success of the Pinelands plan overall. The implementation of the previous eight recommendations will be much easier if this recommendation is the focus.

Quality of life, to many people in the Pinelands and elsewhere, is primarily a function of the size of their homesite either because of increased privacy, or as an indicator of personal success. In addition, higher density in the past 50 years has meant the pollution of air and water, traffic congestion, new schools, expensive services, etc.

It was the investigator's first thought that base densities in certain growth areas should be lowered. However, we are finding now that pedestrian proximity to the natural environment and the feeling of belonging to a community and neighborhood are components of quality of life that, in addition to privacy, can be provided in higher density neighborhoods and communities through new design approaches. Technological advances and new land use

planning concepts can also help us deal with pollution, traffic, and services. Specific techniques for achieving these results in the ordinances and on the ground are now available.

The investigator believes the Commission is now positioned to confront the negative attitude toward higher density among many local officials and residents. Better design alternatives can now be defined to show how the growth areas can evolve at higher densities as beautiful communities in which the Pinelands residents will wish to live. The Pinelands Plan and the municipal ordinances can be upgraded to provide the guidance to developers which will result in these beautiful Pinelands growth area communities.

The investigator also believes it is the Commission's responsibility to raise the consciousness for better designed development as it did for environmental protection. Since the growth areas are planned to house a large portion of the future Pinelands population, achieving the highest quality of life in these communities becomes the critical issue. The negative emotion regarding the Pinelands plan may be rooted in the feeling that today's development systems generally result in lower quality environments at higher densities.

systems generally result in lower quality environments at higher densities.

The use of design professionals to demonstrate to developers and municipalities the advantages of new approaches to development planning and suggest appropriate enhancements to the ordinances would result in better communities and promote PDC utilization at the same time. Achieving sense of community, preservation of open space, and efficient use of infrastructure is facilitated with the use of Pinelands Development Credits. PDC's, indeed, may be a key component to the achievement of these objectives.

QUESTIONNAIRE

Pinelands Development Credit (PDC) Program

Name _____ Farmer(crops): _____
 Address _____ Developer(project): _____
 Telephone _____ Municipal Official
 (town): _____
 ___ Landowner: _____ Attorney(clients): _____
Town Acres Sending Receiving _____ Engineer(clients): _____
 _____ _____ _____ _____ _____ Realtor(company): _____
 _____ _____ _____ _____ _____ Other _____

1. How do you feel, in general, about the PDC Program?

2. What do you know about the PDC Program?	<u>Yes</u>	<u>No</u>
Pinelands Development Credit		
Number of homes per credit	_____	_____
Value today	_____	_____
Sending Areas		
Type of land/location	_____	_____
Allocation Formula	_____	_____
Receiving Areas		
Location	_____	_____
Density Bonuses	_____	_____
The Transfer Process		
Letter of Interpretation	_____	_____
Title closing to restrict land	_____	_____
New deed to buyer & seller	_____	_____
Burlington County PDC Exchange	_____	_____
State PDC Bank	_____	_____

3. Do you think the PDC Program is financially profitable for you? Why or why not?	<u>Good</u>	<u>Bad</u>	<u>Suggestions</u>
Sending Areas			
Allocation Formula	_____	_____	_____
Interpretation Process	_____	_____	_____
Other			

3. Do you think the PDC Program is financially profitable for you? (continued)

	<u>Good</u>	<u>Bad</u>	<u>Suggestions</u>
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Receiving Areas

Current Zoning	_____	_____	_____
Density Bonuses	_____	_____	_____
Planning Board Attitude	_____	_____	_____
Township Engineer Attitude	_____	_____	_____
Township Attorney Attitude	_____	_____	_____
Current Value of PDCs	_____	_____	_____
Burlington County Exchange	_____	_____	_____
Process of PDC Acquisition	_____	_____	_____
Process of PDC Sale/Retirement	_____	_____	_____
State Bank	_____	_____	_____
Other _____	_____	_____	_____

4. What are the strongest elements of the PDC Program?

5. What are the biggest problems with the PDC Program?

6. Do you think the concept of the PDC Program is generally a good idea? Why or why not?

7. Do you have any suggestions to improve the program?

APPENDIX A - INTERVIEWS

	<u>Name</u>	<u>Occupation</u>	<u>Location</u>	<u>Date of Interview</u>
1.	Chuck Gallagher	PDC Bank	Mt. Holly	6/25/86
2.	Nancy Hoagland	Pln Bd Secy	Hamilton	6/25/86
3.	Wayne Oldroyd	Planner	Smithville	9/17/86
4.	Michael Gross	Attorney	Middletown	9/17/86
5.	Ralph Varalli	Developer	Voorhees	9/18/86
6.	Charles Anderson	Land Owner	Winslow	9/18/86
7.	Rod Sterling	Realtor	Lacey	9/24/86
8.	Nelson Gross	Attorney	Hammonton	9/24/86
9.	Art Bird	Pln Bd Chmn	Hamilton	9/24/86
10.	Ray Townsend	Mayor	Hamilton	9/25/86
11.	Tony Pagano	Developer	Winslow	9/25/86
12.	Joel Jacovitz	Developer	Egg Harbor	10/14/86
13.	Tom Nace	Pln Bd Chmn	Egg Harbor	10/14/86
14.	Gothrie Short	Pln Bd Chmn	Winslow	10/15/86
15.	Peter Greenberg	Developer	Hamilton	10/15/86
16.	Gerry Haughey	Attorney	Mt. Holly	10/15/86
17.	Patrick McAndrew	Attorney	Mt. Holly	10/15/86
18.	Bob Meyer, Jr.	Developer	Medford	10/29/86
19.	Leland Stanford	Chmn MUA	Hamilton	10/30/86
20.	Joe Maressa	Developer	Winslow	10/30/86
21.	Michael Tamn	Developer	Pemberton	11/18/86
22.	Bernie Boyarin	Realtor	Jackson	11/18/86
23.	Charles Biderman	Developer	Jackson	11/18/86
24.	Ray Shea	Attorney	Jackson	11/18/86
25.	Don Cunningham	Developer	Winslow	11/19/86
26.	Lou & Chris Eni	Land Owner	Medford	12/8/86
27.	Richard Ragan	Planner	Medford	12/8/86
28.	Eric Levin	Developer	Lakewood	1/7/87
29.	Ed & Ed Angioli	Developer	Pemberton	1/20/87
30.	Herb Lahn	Developer	Marlton	1/20/87
31.	Michael Doorn	Realtor	Marlton	1/20/87
32.	Ed Morris	Developer	Haddonfield	1/20/87
33.	Will Guerro	Developer	Egg Harbor	1/21/87
34.	Betty Geisert	Land Owner	Shamong	2/3/87
35.	Robert Forgash	Attorney	Medford	2/3/87
36.	Frank Petrino	Attorney	Trenton	2/4/87
37.	Roger Hanson	Developer	Galloway	2/17/87
38.	Lynwood Righter	Developer	Pleasantville	2/17/87
39.	Paul Ludwig	Land Owner	New Gretna	3/17/87
40.	Jake Simon	Developer	Pleasantville	3/18/87
41.	Herman Zell	Realtor	Pleasantville	3/18/87
42.	Michael Feldman	Developer	Pemberton	4/7/87
43.	Ernie Bowker	Land Owner	Pemberton	5/6/87
44.	Aldo Cevallos	CCMUA	Camden	6/9/87