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November 3, 2023

Susan Payne
Executive Director
State Agriculture Development Committee
PO Box 330
Trenton, NJ 08625

Re: Soil Protection Rule Proposal

Dear Executive Director Payne,

Please accept this letter as formal comment on the State Agriculture Development Committee's newly proposed regulations regarding "Soil Protection Standards."

As legislators, we have been contacted by a number of interested parties very concerned about the potential impact of the proposed regulations, especially the retroactivity component. We believe that the current proposal is unfair to preserved farm operators, and if adopted, will undermine support among those presently participating in the State's Farmland Preservation Program.

It is our hope that you and your team will look to work collaboratively with the farming community to craft a proposal that works for all involved and achieves the desired outcome of properly defining soil standards without hindering customary activities in the agricultural community. Additionally, we suggest that your team ultimately look to bring in the soil conservation districts to assist in the management of these new practices in order to ensure that they are applied fairly and most effectively.

Thank you for your kind attention.

F. Parker Space
Assemblyman

Sincerely,

Steven V. Oroho
Senator

Harold J. Wirths
Assemblyman

FPS/SVO/HJW:bpc

To: New Jersey State Agriculture Development Committee
SADC@ag.state.nj.us

From: Kingwood Township Environmental Commission

Date: January 24, 2024

Re: State Agriculture Development Committee Rules
Soil Disturbance on Preserved Farmland and Supplemental Soil Disturbance
Standards
Proposed New Rules: N.J.A.C. 2:76-25 and 25A

The Kingwood Township Environmental Commission (KTEC) submits the following comments in support of the above-entitled proposed standards.

KTEC is charged with monitoring and protecting open space, including preserved farmland, within the municipal borders of Kingwood Township, New Jersey.

We support the proposal for the following reasons:

- The standards are being issued pursuant to a directive from the New Jersey Supreme Court and reflect the fact that farmers who have preserved their land have entered into a binding agreement, reflected in the deed of easement, in return for the public support, both financial and otherwise, of farmland preservation programs. These standards present very detailed and comprehensive instructions on compliance with the deed restrictions that a farmer has agreed to upon entering his/her land into farmland preservation.
- Landowners, who are compensated to relinquish development rights on their property, are permitted to reside on and utilize the land for agriculture. However, they must refrain from activities harmful to drainage, flood control, water and soil conservation. Regrettably, some preserved farmland owners violate this bipartisan agreement by engaging in activities undermining conservation goals. The proposed Soil Protection Standards by SADC suggest limiting soil-damaging activities to 12% of a farm's area, a compromise reached after extensive investigation by a subcommittee that included farmers and other stakeholders. A waiver process is proposed for special circumstances.
- In addition to the above, the standards allow reasonable and well thought out levels of allowable soil disturbance, including provisions allowing those farms with defined disturbance levels beyond the maximum set in the standards to make application for additional disturbance up to 2% or 1 acre, whichever is larger.
- The standards are comprehensive provisions which will help protect preserved farmland and the soils thereon so that present and future farmers of that land will

be able to engage in any and all agricultural uses, without being prevented from a chosen use by disturbed soil.

- The standards are rooted in science, including work done at Rutgers The State University and the American Society of Agronomy, Soil Science Society of America, as well as the research and technical resources of agencies whose chief aim is to support farmers, such as the Natural Resources Conservation Service of the United States Department of Agriculture.
- The standards reflect a very thorough reflection of agricultural realities, including, e.g. temporary parking requirements and the ways to avoid such practices being counted as soil disturbances.
- The standards provide a clear way to apply for and implement a program for rehabilitation of individually disturbed areas on a farm.

We thank you for your consideration of our support for this proposal.

Uttal, Jessica [AG]

From: [REDACTED]
Sent: Wednesday, November 8, 2023 8:19 PM
To: SADCPublicComments, NJDA [AG]
Subject: [EXTERNAL] I support rules to maintain the integrity of the Farmland Preservation Program

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To the State Agriculture Development Committee:

I wish to express my strong support for the proposed new rules to limit the amount of soil disturbance allowed on preserved farmland. Such rules are essential to maintain the integrity of the Farmland Preservation program, and are critical to protecting the environment going forward.

We as taxpayers compensated these farmers fairly as part of their participation in the preservation program. It is critical that we ensure the promise of the program is not broken.

Thank you.

Laura Bush
Co-chair, Legislative Committee
Native Plant Society of New Jersey (NPSNJ)

Uttal, Jessica [AG]

From: Jeanine Cava <fooddemocracycollabnj@gmail.com>
Sent: Sunday, November 12, 2023 6:58 PM
To: SADCPublicComments, NJDA [AG]
Cc: SenSmith@njleg.org
Subject: [EXTERNAL] Urging support of soil protection rules on preserved farmland
Attachments: NJ Roadmap for Food System Resilience FINAL 3.8.22.pdf

***** CAUTION *****

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Dear Ms. Payne and SADC leadership team,

I am writing to urge you to support the protection of soils on preserved farmland by supporting the soil protection rules.

As the Lead Facilitator of NJ's independent state food policy council, a member of NJ Farm Bureau, as well as NOFA-NJ, and a concerned NJ resident, and former farm business owner in NJ, I have been following the journey of the new soil protection rules closely. I am aware, and very disappointed that NJ Farm Bureau has been in opposition and to some degree has succeeded in weakening them. We urge the SADC to show leadership in support of the proposed rules despite strong opposition for the long-term benefit of NJ agriculture and the resilience of NJ's food system.

Of course you know that strong soil protection strategies such as those in the proposed rules are needed on *all* agricultural lands as they're critical for the long-term viability of farming in NJ. Preserved farmland included. It is also an important strategy for climate mitigation. We can look to other [states](#) for examples and inspiration for inter-agency cooperation to incentivize farmers to implement key strategies for soil health.

I have attached a copy of our 2022 report, NJ Roadmap for Food System Resilience for your reference.

Thank you. I look forward to having the chance to meet you tomorrow at the NJ Farm Bureau convention and perhaps also next month at the NJ State of the Food System Summit in New Brunswick.

Jeanine Cava

Jeanine Cava
Co-Founder, Lead Facilitator
New Jersey Food Democracy Collaborative
NJ's State Food Policy Council



 www.njfooddemocracy.org  fooddemocracycollabnj@gmail.com

 Need to schedule a meeting with me? [Use this link.](#)

JANUARY 2022

NJ ROADMAP FOR FOOD SYSTEM RESILIENCE

A HOLISTIC JUSTICE FRAMEWORK FOR FOOD SYSTEM TRANSFORMATION



NEW JERSEY FOOD DEMOCRACY COLLABORATIVE

INTRODUCTION

The *NJ Roadmap for Food System Resilience* is an ambitious attempt to present a holistic perspective and framing of food and agriculture issues in New Jersey. We draw on the state's existing environmental justice focus to build a robust social and racial justice framework for resilience. However, we understand that this report does not take the place of a more robust food system action plan. This report is an aspirational statement of what the authors and collaborators believe should be the vision for the New Jersey Food System, based on conversations with over 300 food and agriculture leaders and stakeholders across NJ in 2020 and 2021.

The report is written and presented by members of the New Jersey Food Democracy Collaborative Facilitation Team (NJFDC). The NJFDC is a state-wide food system stakeholder network, inspired by the food policy council model, that focuses on fostering robust multi-sector collaboration and coordination in NJ on food and agriculture issues and advancing structural/policy changes to increase equity and resilience of the state's food system.

The *Roadmap* weaves together food systems issues, the recommendations, and key messages from recent significant reports by leading NJ organizations and state agencies on critical issues including fresh food access and equity; climate change mitigation; adaptation and resilience; economic justice; and sustainable food and agricultural waste. Each of these issue areas influences the strength and resilience of our food system. They are inextricably connected, requiring us to be better connected to one another in our work.

In this document, we present and describe four goals for an *equitable* and *resilient* food system, then present 11 Core Opportunities for Action that will move us toward these goals. What follows are a set of specific action recommendations organized by how to change *perspective, process, and procedures*, and improve collaboration.

High rates of food insecurity, pollution, chronic diet-related illness, and disparities in access to healthy food are outcomes or characteristics of an unsustainable or broken food system. One of the core strengths of a resilient and regenerative food system is diversity: in the scale of farm sizes and of crops produced; of markets and revenue streams for farmers and options for consumers; of consumers and producers demographics; and of pathways for disposal, recycling, and redirection of excess food. Resilient systems also have built-in redundancies so that if one component fails, there are others to take its place, allowing the system to continue to function, improve and even thrive [1].

One of the challenges we faced when writing this document, was creating something that can be useful for a diversity of readers. The information in this document is meant to be used by anyone: by law and policymakers, food access professionals, farmers, retailers, and concerned food citizens alike.

We hope you will find this framing of the challenges and the *Roadmap* for action that we've laid out here to be useful. We look forward to working with you on the recommendations. Thank you for reading.

ACKNOWLEDGEMENTS

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Suggested citation:

Cava, J., Elnakib, S., Gershman, J., Fisher, R. (2022) *NJ Roadmap for Food System Resilience: A holistic justice framework for food system transformation*. New Jersey Food Democracy Collaborative.

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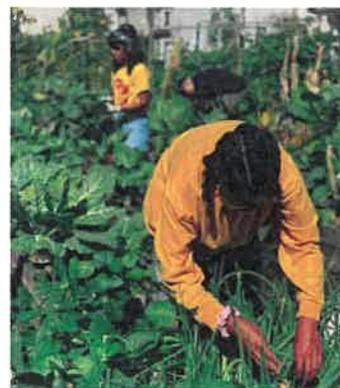
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From left: Smith Poultry Farm, Stockton University Sustainability Farm, Green Acre Community Garden

THE GOALS OF THE ROADMAP REPORT

The NJFDC has developed a vision of a transformative NJ food system, built through a process of conversation and collaboration with residents across NJ. Our consultations have identified four main goals to transform the food system so it is *equitable, resilient, and collaborative*, including:

Establish an equitable and democratic food system

- Reconfigure power relationships so that participation in and control over the food system is shaped by the rights of people to influence and design the food environments they need to thrive.
- Create mechanisms for inclusive participation such that all stakeholders can exercise their power to shape their food system.
- Eradicate hunger and food insecurity, increase the availability of healthy food to all residents, ensure access to clean water, and ensure food safety.

Strengthen livelihoods for food producers and food workers in New Jersey

- Increase sustainable and climate-sensitive production, sales, and consumption of NJ-grown foods.
- Create jobs and economic opportunities in food, fisheries, and farming and improve the wages, working conditions, and skills of food system workers.
- Ensure all farmer businesses that can demonstrate intentional support for community food access and food security, regardless of size or profit, are protected by Right to Farm.

Protect the land, water, and biodiversity needed to produce food and maximize environmental benefits from agriculture and fishing.

- Shift to sustainable consumption patterns - promoting and creating demand for healthy and sustainable diets and reducing waste.
- Transition to regenerative and restorative agricultural practices and food systems grounded in agroecological principles.
- Support protection of biodiversity, including agro-biodiversity.
- Meet NJ's climate mitigation targets and implement climate adaptation strategies in all sectors.

Employ a justice-oriented approach to resilience in the food system

- Draw on the existing environmental justice focus to build a robust social and racial justice framework for resilience.
- Design and ensure opportunities for authentic participation and leadership from impacted, under-served and historically-marginalized communities in food system governance at all scales.
- Prioritize equity and the repair of past injustices throughout the food system: from removing barriers to breastfeeding and increasing support for socially-disadvantaged farmers, to addressing fairness and sustainability with food waste reduction.

FOOD SYSTEM TRANSFORMATION: PERSPECTIVE, PROCESS, & COLLABORATION

Recognizing these four goals, and the need to reinvigorate existing and develop new governance mechanisms of the food system, requires a shift in **perspective** and **practice** in order to achieve an *equitable, democratic, sustainable, and resilient* food system.

The shift in **perspective** is towards a system-level approach to food policy that is grounded in *equity* and *democratic participation*. The shift in **practice** is to approach governing/managing the food system as an ongoing process and that, for reasons of both effectiveness and justice, must have robust mechanisms that incorporate the breadth of stakeholders involved, with special attention to those who have been traditionally excluded.

Many institutions formally involved in the management of resources central to the food system are already multi-stakeholder governance mechanisms, from Soil Conservation Districts to the Atlantic States Marine Fisheries Commission. But these entities are often under-resourced and are not always inclusive of voices from the most marginalized communities.

The common themes among these approaches are finding ways to *collaborate and coordinate* – across sectors (public, private, civil society), across scale, across agencies in government, between producers and consumers to create optimal outcomes for the specific populations, communities, program participants, and stakeholder groups. *Without collaboration and coordination, it is difficult to make strides on interwoven issues such as food equity.*

The following sections focus attention on 11 Core Opportunities for Action needed to align NJ's food system with a vision of equity and resilience and with the above-listed goals through shifts in **perspective**, **process**, and improving **collaboration**.

CORE OPPORTUNITY ONE

ADOPT A HOLISTIC FOOD SYSTEM PERSPECTIVE

Increasing Diversity

The core strength of a resilient food system is diversity: diversity in the scale of farm sizes and of crops produced; diversity of markets and revenue streams for farmers and options for consumers; economic diversity and inclusion of consumers; and diversity of pathways for disposal, recycling, and redirection of excess food. Resilient systems also have built-in redundancies so that if one component fails, there are others to take its place, allowing the system to continue to function, improve and even thrive.

Eliminating Inequity

A food system is weakened by inequities. When certain groups or components of the food system are disproportionately vulnerable, excluded, or bear a greater burden of the negative externalities of the system than others, it is less resilient.

Interconnected Systems

In NJ we have demonstrated our understanding of the need for an interconnected system when it comes to environmental justice and more recently in improved health equity and climate resilience. We assert that food system resilience is connected to each of these goals.

We cannot effectively progress toward climate resilience without prioritizing resilience in the food and agriculture system. We cannot effectively progress toward health and social equity without centering equitable access to and production of healthy food in all of our communities via regenerative and anti-racist local food economies.



Deacon Davis at Green Acre Community Garden. Photo by Martine Anconfora

CORE OPPORTUNITY TWO

STREAMLINE FOOD SYSTEM GOVERNANCE & DEVELOP A STATE FOOD CHARTER

This paradigm shift requires more than a change in language. It requires education, discourse, an open mind, and an openness to new, perhaps less traditional alliances and partnerships. Persistent and pervasive inequity and dangerous climate vulnerabilities that threaten food security for us all demand this. Practical steps to facilitate the adoption of a food system perspective include:

- Develop a food system action plan that utilizes researched best practices and a collaborative transparent process with specific input from marginalized communities.
- Initiate the development of a state Good Food Charter as has been done in other states.
- Convene annual State of the Food System Gatherings with engagement in planning from government officials, elected representatives, business, and community representatives, including compensated participation from impacted groups.
- Establish a multi-departmental NJ Food System dashboard with data on all parts of the food system accessible to the public.

A food system approach demands collaboration and shared leadership models. It requires centering the perspective of the end-users or groups impacted by programs and policies. It requires co-creating new opportunities for learning and policymaking across sectors and new institutional forms that center the perspective and knowledge of those who experience inequities or live in disproportionately impacted communities.

- Establish learning collaboratives where communities facing similar challenges can collaborate, learn from each other and co-create solutions.
- Establish a connection between food system organizations, such as the NJFDC, and the new office of Food Security Advocate.
- Advance the Food Waste Task Force and ensure that it takes a food system approach to the issue of organic materials management.

The new office of Food Security Advocate (A5884) and the establishment of a Food Waste Task Force (A4705), among other existing attempts at collaborative food system governance, should be brought under one “umbrella” of central food system governance, and the missions and connections between these entities streamlined. The NJFDC advocates for the state to follow the lead of other U.S. states in the development of a State Food Charter or State Food System Action Plan, in partnership with representatives from state agencies, NGOs, public health agencies, agricultural organizations, and all parts of the food system. **We advise a review of the best available research for this, especially the recently published *Participatory State and Regional Food System Plans and Charters in the U.S.: A Summary of Trends and National Directory* [2]** from the Center for Regional Food Systems at Michigan State University. There should be incentivized representation from individuals who experience food insecurity in the development of a state food charter or action plan.

The NJFDC is prepared to support the development of a state-wide food system action plan and Good Food Charter.

CORE OPPORTUNITY THREE

IMPROVE KNOWLEDGE AND ASSESSMENT & INCREASE TRANSPARENCY

Currently, other than the NJFDC's Food System Research Working Group, there is no central organizing institution that is bringing together food system researchers in NJ. There is also a lack of a significant body of research on local food system development, the NJ food environment, nutrition incentive programs, and 'food desert'-related research in NJ compared to neighboring states.

To address our need for information and assessment across all sectors of the food system, the State of NJ should support the production and dissemination of an **Annual Food Equity Report**.

State agencies should collaborate to produce and share a report on the state of the food and agricultural system, with a focus on equitable access and resilience. This report should include, at a minimum, data on:

- SNAP, WIC, and FMNP redemption at farmstands and farmers' markets.
- County-specific data on distribution in dollars of food and nutrition assistance funding including how much funding was left undistributed at the end of each fiscal year.
- CACFP, Summer Meal Program, and School Meal Program, enrollment data by county and municipality.
- Number of SNAP-eligible and enrolled individuals and families by county and municipality.
- Outreach tools implemented in each county to increase the ratio of SNAP-enrolled to eligible families.
- Assessment reporting on the effectiveness of the outreach and communication strategies used by state agencies to reach SNAP-enrolled families and individuals about maximizing the full range of their benefits.
- How SNAP outreach funding is spent.
- Document efforts taken to increase enrollment and improve access to NJ-grown agricultural products.
- Document efforts made to improve cross-agency collaboration on food system challenges.

Finally, NJ needs a food system research agenda to steer funding and state-wide public and private research efforts toward improved food system awareness and assessment.

An NJ Food System Database, searchable and available to the public, where available federal, state, and county data can be aggregated and organized in one place, should be funded and developed. In July 2021, the NJ FDC initiated NJ's first Food System Research Working Group, co-led by Montclair State University and Stockton University. The effort is currently unfunded and requires adequate support to provide the information infrastructure that NJ needs to fill critical gaps in its understanding of state food system assets, needs, and impacts.

CORE OPPORTUNITY FOUR

OPERATIONALIZE EFFECTIVE PROCESSES FOR INTER-AGENCY & MULTI-SECTOR COORDINATION

Efforts by Governor Phil Murphy to promote coordinated governance and a whole-of-government approach to issues such as *environmental justice* and *climate resilience* are commendable. We strongly advocate for the same ethos and approach to be taken with addressing food system inequities, climate vulnerabilities, and reducing emissions from all sectors and activities in the state's food system.

To this end, we call for NJ leaders, lawmakers, and leaders of state agencies and nonprofits to review their programs and operations to identify those that are ripe for connecting and coordinating with other related programs within their departments, within other state agencies, or in the private sector.

Furthermore, we call on NJ leaders to *provide clear directives* to the appropriate state agencies on what coordination and collaboration between state programs should look like to optimize the functionality of those program funds for the "end-user" recipients.

- **Initiate monthly interagency and briefing meetings** for the heads of programs and divisions of all state agencies that directly deal with food and agriculture (e.g., Division of Family Development at NJDHS, SNAP-Ed and WIC at NJDOH, Food and Nutrition Division at NJDOE) for the purpose of continuously identifying opportunities to connect and streamline efforts.
- **Connect important food security programs to the state's local food economy.** This is a key to equitable access and boosts support for NJ-grown and produced foods.
- **Adopt a collaborative perspective and implement new processes for connections** between federal, state, and county agencies and the NJ nonprofit food access community would create opportunities for the innovation of tools, resources, and programming to support a more efficient and resilient food system, benefiting millions of NJ residents.



Dark Moon Groves Turkeys. Photo by Amy Rowe

CORE OPPORTUNITY FIVE

FOSTER LOCAL & REGIONAL FOOD POLICY COUNCILS ACROSS NJ

Foster the development of Food Policy Councils at Diverse and Appropriate Scales

In 2021, two important reports made strategic recommendations for food policy councils in NJ: the first in the context of increasing fresh fruit and vegetable consumption for low-income residents was produced by the NJ Department of Health, SNAP-Education through The Food Trust, and the second through a robust, multi-sector and exemplary partner engagement process led by Bayshore Family of Companies and the NJ Climate Change Alliance's Organics Workgroup. The resulting 2021 Sustainable Organic Materials Management Plan also calls for the development of state and regional food policy councils to address interconnected food insecurity and food waste challenges.

Existing organizations such as the New Jersey Food Democracy Collaborative, Rutgers Cooperative Extension, county or city planning, or public health departments should take steps to initiate food policy councils (or food system collaboratives) at the appropriate scale, as hundreds of communities have done across the U.S. Food policy councils are an increasingly common and beneficial approach for addressing food system issues that are by nature interconnected and require collaboration across sectors. [3]

NJFDC seeks to advance the practice and implementation of the food policy council approach in communities across NJ together with its partners.

In June 2021, NJFDC partner organizations collaborated to offer an informational webinar about food policy councils for NJ. The event was well-attended and 81% of post-event participants surveyed reported that they are interested in additional training and information on food policy councils for their NJ city or region.

Advance & Expand New State Food System Governance Initiatives to Foster Development of Food Policy Councils

NJFDC and its partners recognize the opportunity for NJ government to leverage the new state office of Food Insecurity Advocate, the NJ Economic Development Authority's "Food Desert" Relief Program, the NJ Food Waste Task Force, among other state initiatives and programs, to support and advance the development of food policy councils across the state.

CORE OPPORTUNITY SIX

LEVERAGE FEDERAL NUTRITION PROGRAMS TO SUPPORT ACCESS TO FOOD ACROSS NJ

Specific focus should be paid to NJ's participation in federal nutrition programs including but not limited to SNAP, WIC, CACFP, summer nutrition program, and school nutrition programs. We fully support the important findings and recommendations made by Hunger Free NJ in their 2021 Report, "[Boosting NJ SNAP: Eliminating Barriers to Enrollment](#)." The improvements advocated for in that report and in this document would increase not only SNAP enrollment, ensuring that all eligible NJ residents can access the federal funds provided to the state of NJ, but also increase redemption of those program funds at NJ-owned and operated agriculture and food businesses. This will generate revenue for the state's agricultural economy and increase fresh fruit and vegetable consumption by low-income residents across the state -- therefore increasing food equity and improving the resilience of the system.

NJ ranks 30th in the nation in SNAP participation with only 81% of eligible participants enrolled in the program. WIC participation is even lower, with only 57% of those eligible enrolled in the program. Additionally, school nutrition programs have similarly low rates of participation with summer nutrition programs only serving 22% of those eligible and school nutrition programs serving 57% of students facing food insecurity. *Tens of millions of federal dollars are not accessed each year due to a lack of enrollment in these programs.*

Temporary suspension of the SNAP Employment & Training requirement for SNAP-recipients implemented during the Covid-19 pandemic should be made permanent.

Systemic improvements and innovations to state agency communication mechanisms are needed to effectively connect consumers, producers, retailers, schools, and other food system groups to existing programs and resources designed to support them.

NJ's methods of reaching residents and specific communities with critical information about food and agriculture resources need to be updated and aligned with the contemporary digital communication environment. *Communication methods should be diverse to meet the communication preferences of all NJ communities, especially low-income and tech-resource limited populations.*

To achieve this, we recommend:

- **Design communication about food and agriculture programs** with the end-users lived experiences in mind.
- **Seek and use robust feedback and input from target audiences** about their communication needs and preferences.
- **Connect, coordinate, and integrate communication messaging** and methods across and within state agencies whenever appropriate.

CORE OPPORTUNITY SIX (CONTINUED)

LEVERAGE FEDERAL NUTRITION PROGRAMS TO SUPPORT ACCESS TO FOOD ACROSS NJ

- **Create an integrated state digital tools to communicate and disseminate information** about state food access and community agriculture programs such as SNAP, Summer Nutrition Programs, WIC, Senior FMNP, Jersey Fresh, School Nutrition Programs, and other agricultural and food-related information.
 - **Set a target for doubling the number of farm stands and community farmers' markets that are authorized to accept SNAP, WIC by 2024.** This can be done with a robust collaborative effort of government, nonprofits, and the agriculture community.
 - **Set a target for increasing participation in CACFP, Summer Nutrition Programs, and School Nutrition Programs.**
 - **Work with community stakeholders to identify barriers to participation** and increase state agencies' awareness of the end user's challenges to enrollment and retention in federal programs.
 - **Simplify the application processes for food assistance programs** and update online systems to be more accessible. [4]
 - Applications should be available in multiple languages, and both paper and online applications should be improved for readability.
 - The online system should have detailed directions about how to complete and submit an application, including basic instructions such as "how to create a free email account," "how to scan and upload documents," and any other relevant information.
 - Effective trauma-informed marketing and communication tools for food-insecure New Jerseyans should be created and maintained. Information about accessing resources must be clear, user-friendly, and easy to use for all eligible populations. This recommendation aligns with the recommendations of the NJDOH Strategic Plan for Increasing Fresh Fruit and Vegetable Consumption in Low-Income Communities.
 - **Improve collaboration to bring more federal funding for food and agriculture projects to NJ** State agencies, higher education institutions, and nonprofits should encourage and foster collaboration, improve transparency, and leverage efforts to apply for federal funding to support NJ's food system. By working together to apply for funds, including USDA Agricultural Marketing Services competitive grant programs and Hunger and Food Security Programs, we can be more effective at bringing federal funds to NJ that support a resilient and equitable food system.
 - **Advocate for needed changes and funding increases for relevant programs in the Farm Bill.** All NJ food and farming stakeholders, including state lawmakers, the Governor's Office, and citizens across the state should get involved with advocacy efforts ahead of the next Farm Bill. Discussions and advocacy for a Farm Bill that supports local food system infrastructure and programs, equity for historically-marginalized and excluded farmers, and equity across the entire food system, begins in 2022.
-

CORE OPPORTUNITY SEVEN

BOLSTER LOCAL FOOD ECONOMY INFRASTRUCTURE

Financial and policy support for NJ's food economy infrastructure is necessary to create equitable access to food in NJ communities. Within urban and/or low-income areas, there is limited support for food producers and farmers, farmers' markets, agricultural cooperatives, food industry entrepreneurs, community farms, and school gardens.

Priorities for Bolstering NJ's Local Food Economy Infrastructure:

- **Invest in urban farmers, land tenure, and on-farm infrastructure.** Provide a diversity of funding support for irrigation systems, season extension, cold storage, harvesting stations, composting infrastructure, and land access programs, in particular for groups identified as socially disadvantaged by the USDA.
- **Increase public-private underwriting of new farmer incubator programs** that provide lease-to-own agreements for farmland, especially farmland currently owned by aging farmers who will need to pass their land on to younger growers else it be lost to non-agricultural uses.
- **Digitize all food and nutrition assistance programs.** Make all information and spending smartphone-friendly and provide no-cost point of sale devices for low-income farmers and farmers' markets that accept food and nutrition assistance programs.
- **Provide a diversity of funding support for food distribution and processing infrastructure.** Support capital investments in shared infrastructure such as shared-use community kitchens, community cold storage space for urban farmers, regional food hub infrastructure, and nonprofit community farmers markets.
- **Increase financial support to small food-related businesses.** Support growth of small businesses through flexible financing and target training opportunities to meet changing demand.
- **Develop farm and fishery-to-institution markets.** Build direct connections between producers and large buyers, and support regulations that foster procurement processes for public institutions, and incentivize purchases from local sources.
- **Invest in coalition building** among growers, especially urban growers, to create resilient connections among food producers and distributors, and support food system collaboratives and growers associations.

Funding community farms and school gardens is key as several research studies have shown that experience in gardening is linked with increased fruit and vegetable consumption. [5] Many small grants for urban agriculture cover only equipment and supplies, and not personnel and labor. While larger grants are often too large and complicated for small urban nonprofit organizations

CORE OPPORTUNITY SEVEN (CONTINUED)

BOLSTER LOCAL FOOD ECONOMY INFRASTRUCTURE

Additionally, there is a lack of SNAP and FMNP-authorized farm stands and community farmers' markets in suburban, urban, and rural NJ, particularly in low-income areas, and there is inadequate transportation to those markets. [See note below] Several counties are without a single SNAP or WIC-authorized market and most counties have only one. [6] These markets are very poorly promoted to SNAP & WIC recipients. Outreach to market managers and farmers on becoming authorized for WIC and SNAP is severely lacking in NJ.

There is a tremendous opportunity to invigorate local and regional food economies by investing in the necessary physical and human infrastructure.

- Grants and low-interest loans to growers and market managers in state designated food desert communities for personnel costs and hard infrastructure costs such as those provided by NRCS.
- More frequent and flexible (virtual and in-person) training for becoming a SNAP or WIC FMNP authorized grower or market.
- Incentives for rural and urban growers to participate in SNAP authorized markets.
- Permanent state expansion of SNAP-based fresh produce incentive programs at farmers markets and brick-and-mortar retailer locations.
- Permanent state funding for wireless EBT card point of sale machines and printing of tokens or cards for growers and markets, especially those that commit to vending in food deserts and other high need areas.
- Investment in and government support for farm-to-institution programs in which anchor institutions, like health care systems and universities, enter into contracts to purchase products from NJ farmers. A number of states have instituted successful farm-to-institution programs to increase sales of locally-produced agricultural products and access to healthy foods.
- Revision or elimination of the "5-acre rule" which is preventing small growers from participating in FMNP and excluding eligible NJ residents who do not have access to any FMNP redemption sites as a result.

This core opportunity for action can strengthen the livelihoods of NJ growers while establishing equitable and democratic access to NJ-grown produce.

Note: According to findings from NJ SNAP-Ed Strategic Planning effort to increase fresh fruit and vegetable consumption in low-income communities in NJ and qualitative data from the



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CORE OPPORTUNITY EIGHT

IMPLEMENT CLIMATE MITIGATION & ADAPTATION RECOMMENDATIONS IN THE FOOD SYSTEM

Governor Phil Murphy has significantly advanced NJ's public policy focus on climate change through the issuance of Executive Orders 89 and 100, adoption of updated Energy Master Plan, and signing key legislation such as the Food Waste Recycling Law. Under his direction, the NJDEP released its "Global Warming Response Act 80 x 50 Report" in October 2020. This important work evaluates NJ's progress in addressing the climate threat and outlines pathways to reduce emissions by 80% by the year 2050.

The work of the New Jersey Climate Change Alliance (NJCCA) Organics Workgroup resulted in the development of an implementation plan for the Waste & Agriculture chapter of the 80 x 50 report. A case for sustainable materials management is made in the Plan introduction, as well as a summary of organics management and climate change. An initial set of 17 core Opportunities for Action to address climate resilience and adaptation are framed within the report.

The NJFDC supports the recommendations of the Sustainable Organic Materials Management Plan and the subsequent March 2022 report, "Advancing the New Jersey Sustainable Organic Material Management Plan: Opportunities to Increase Food Security and Reduce New Jersey's Organic Waste, prepared for the New Jersey Climate Change Alliance. These efforts identify critical steps and opportunities to advance the implementation of food and agricultural waste reduction strategies for NJ.

A recommendation from the "80 x 50 Report" that warrants special emphasis is the following: "Agricultural practices offer opportunities to reduce GHG emissions. Expanded educational and outreach efforts to the agricultural community about climate-friendly agricultural practices should be prioritized. To enhance these efforts NJDA should amplify its outreach efforts to enroll farmers in the USDA's Environmental Quality Incentives Program (EQIP)¹⁷, the Conservation Reserve Enhancement Program (CREP)¹⁸, and the utilization of precision agriculture."

- The 2022 report *Forest Resource Considerations for a New Jersey Natural and Working Lands Strategy* by the NJCCA Natural and Working Lands Workgroup summarizes the process and resultant strategy options for storing and sequestering carbon on NJ's natural and working lands.
- Expansion of outreach efforts to farmers of all sizes, in both rural and urban settings across the state, is needed to increase the implementation of climate-friendly mitigation and adaptation practices.
- We encourage NJ lawmakers and government leaders to work with experts in the academic, farming, and nonprofit communities to examine examples of state policy that create economic opportunities for farmers to implement climate mitigation and adaptation measures, and develop legislative proposals appropriate for NJ.

CORE OPPORTUNITY NINE

ADEQUATELY SUPPORT, INTEGRATE & EXPAND EXISTING PROGRAMS

Fortunately, some of the programs, infrastructure and resources needed to address and improve equity and resilience need not be designed “from scratch”. Reviewing existing state and multi-level programs to find ways to expand them, improve their functionality, and assess how they could connect with other states, county, and nonprofit programs could go a long way in helping optimize those programs for NJ residents and business owners.

Several recent efforts to integrate, connect, and leverage disparate programs in the food system space are noteworthy, including:

- Sustainable Jersey’s Gold Star Standard in Health which integrates municipal-led solutions on food waste, food insecurity, and social determinants of health.
- City Green and the YMCA Alliance’s efforts to launch a statewide Growers and Farmers Markets Coalition.
- NJ Climate Change Alliance Organics Workgroup development of the Sustainable Organic Materials Management Plan.
- NJDOH’s SNAP-Education Strategic Planning initiative for Increasing Fresh Fruit and Vegetable Access for Low-Income Communities.
- NJFDC’s efforts to establish a statewide food policy network and state food policy council.

The pandemic highlighted the impact of human-centered legislation on participants and enrollment in nutrition programs. Programs that were initiated during the pandemic should continue beyond such as:

- Universal free school lunch programs that were during the pandemic so that nutritious school lunch programs are available to all (and include, as appropriate, breakfast and snacks for after-school programs). Districts can build relationships with local providers to support local economic activity and ensure the provision of nutritious food.
- Pandemic EBT allowed states to provide benefits to children who normally receive free or reduced-price school meals.
- WIC agencies issued benefits remotely and removed the in-person requirement.
- Continue to expand the number of retailers who will accept SNAP for grocery deliveries, enhancing access for the disabled and mobility-impaired New Jerseyans.
- Secure resources and appropriate public agency participation to advance the SNAP-Ed Strategic Recommendations for Increasing Fresh Fruit & Vegetable Access for Low Income Communities.

CORE OPPORTUNITY TEN

EXPAND FRESH PRODUCE PURCHASING INCENTIVE PROGRAMS FOR FULL STATE COVERAGE

Perhaps the most important example of existing programs that should be expanded to advance food equity across the state are the fresh produce incentive programs, and the produce prescription programs, namely City Green's SNAP-nutrition incentive program, called **Good Food Bucks**, and The Food Trust's Food Bucks Network. [See note]. The powerful impact for families, farmers, and communities of produce incentive programs is well documented. In particular, the 2018 report, "The Power of Produce" by The Food Trust through support from the Robert Wood Johnson Foundation outlines the importance and impact of produce incentives on food and health equity. [7]

City Green's Good Food Bucks is a statewide program that incentivizes and empowers NJ residents using SNAP to double the number of fresh fruits and vegetables they bring home to their families while supporting NJ farmers. In 2020, federal benefit shoppers purchased \$83,000 of Jersey Fresh food from NJ farmers and vendors at Garden State Good Food Network partner farmers markets with their SNAP dollars, WIC and Senior FMNP vouchers, and Good Food Bucks.

The Good Food Buck program began in 2011, and operates at 20 fresh food retailers, including grocery stores, farmers' markets, and farm stands in eight NJ Counties. Fifty three percent of New Jersey residents live in a congressional district with a Good Food Bucks program. [8]

In September 2021, Fair Food Network transferred the administration of their Double Up NJ program to City Green and the Garden State Good Food Network. Fair Food Network is active in 28 U.S. states. While it operated its national Double Up Food Bucks program in NJ, it resulted in more than \$368,000 in incentive redemptions. [9] With the transfer of program administration, the Good Food Bucks nutrition incentive program expanded to brick-and-mortar grocery retailers, while continuing to offer incentives at community farmers' markets, farm stands, and CSAs across NJ.

Incentive programs are a "Triple Win"; they help families bring home more fruits and vegetables, boost business for NJ farmers, and bolster local economies, strengthening our communities.

Note: SNAP-based produce incentive programs, through which shoppers paying with SNAP earn coupons for free fresh fruits and vegetables, and produce prescription programs, through which healthcare providers distribute fresh produce, or vouchers redeemable for fresh produce, to the patients they serve. The current SNAP incentive programs operating in New Jersey are City Green's Garden State Good Food Buck program and The Food Trust's Food Bucks program. Produce prescription programs are operated by organizations around the state under a variety of program names.

CORE OPPORTUNITY TEN (CONTINUED)

EXPAND FRESH FOOD PURCHASING INCENTIVE PROGRAMS FOR FULL STATE COVERAGE

The Food Trust's Food Bucks program began in Philadelphia in 2010 and expanded to Camden, NJ in 2018. Since then, Camden residents have redeemed over \$190,000 in Food Bucks for fresh fruits and vegetables at a farmers market, eight stores participating in the Healthy Corner Store Initiative, and Virtua Health's Eat Well Mobile Farmers Market. Information about Food Bucks is available at thefoodtrust.org/foodbucks.

Because SNAP incentive grants from the USDA require match funding, programs in states with **state appropriations for nutrition incentives**, like Fair Food Network's Double Up Food Bucks program in Michigan, have been especially successful in leveraging federal grant dollars to improve access to fresh fruits and vegetables. [See note] Michigan's Double Up Food Bucks program served over 85,000 households in 2019 and saw over \$6.9 million in fresh produce sales. [9]

City Green's Good Food Bucks and The Food Trust's Food Bucks are critical food equity programs for NJ. However, parts of the state are currently unserved by fresh produce incentive programs. We recommend the following to expand the reach:

- State appropriations to provide stable funding for SNAP incentive programs at farmers markets and brick-and-mortar retailer locations.
- Medicaid and other payer funding for produce prescription programs.
- Systematic promotion of incentive programs to farmers' markets, farmers, and federal food program participants and eligible residents across the state by government, private and nonprofit partners.
- Increase and improve outreach information to residents and businesses about NJ's existing produce incentive programs via NJ SNAP, SNAP-Education, and other state programs.

If the NJ government and state healthcare systems were to provide stable funding to expand these program and integrate it into existing state programs such as NJ SNAP and NJ SNAP-Education outreach information, tens of thousands of NJ residents, farmers, and food business owners could benefit.

Note: Produce incentives in NJ are supported by USDA's Gus Schumacher Nutrition Incentive Program (GusNIP), among other funders.



Photo courtesy of Alyssa Smolen

CORE OPPORTUNITY ELEVEN

STRENGTHEN LIVELIHOODS ACROSS THE FOOD SYSTEM

Of the approximately 500,000 residents with jobs in our food system, the majority are in retail and restaurant work. Jobs throughout the food system are often low-wage and without healthcare or benefits. These are the essential workers that keep food on the shelves and in our homes, yet these workers are among the most vulnerable and disadvantaged in our entire economy.

The foundations for more robust livelihoods for food system workers includes:

- **Protection of existing farmland.**
- **Support for transition to organic and regenerative agriculture.**
- **Support for the consumption of healthier foods.**
- **Improve economic & labor conditions for food system workers.**
- **Institute strong, evidence-based farm to institution policies and programs.**
- **Address critical exclusions in Right to Farm protections that leave small, new, and socially-disadvantaged producers vulnerable.**

To support food system businesses, workers, and consumers, strong research, educational, and technical assistance network is needed. To this end, we recommend strengthening Rutgers Cooperative Extension's capacity to provide needed education and technical assistance targeted to the needs of the food industry and encourage partnerships and collaborations to avoid duplication and provide services where they are most needed. Policymakers and higher education leaders should explore possibilities for community colleges to develop programs aimed at enhancing the skills of food industries.

Regenerative food systems are required for robust livelihoods in NJ. Policymakers and state agencies must ensure that regulations support the growth of agriculture and other food system businesses while protecting workers, the environment, and public health. To this end, NJ policymakers and leaders should develop and implement regulations consistently and fairly, through a transparent and engaged process. This includes pairing guidance and assistance, especially for small firms, in order to meet new standards and regulations, facilitate compliance, and improve practices.

Policymakers and advocates should take an industrial upgrading approach to regulations:

- Examine, assess, and revise regulations that add costs to food businesses unnecessarily.
- New regulations should advance public good while improving industry performance.
- Use new regulations as opportunities for industry upgrading by prioritizing assistance to support compliance rather than punitive action for violations.

CORE OPPORTUNITY ELEVEN (CONTINUED)

STRENGTHEN LIVELIHOODS ACROSS THE FOOD SYSTEM

Across government and the private sector, we must fund infrastructure development:

- Support investments in modern equipment that facilitates safe, efficient food production and processing.
- Develop shared-use and multi-purpose incubators to nurture small businesses.

Workforce development is critical to the transition to a regenerative food system that supports healthy and economically secure livelihoods:

- Support regulations that enhance the well-being of food delivery workers, such as those recently passed in NYC.
- Expand and enhance agriculture, agribusiness, animal sciences, and other agriculture-specific **vocational-technical school programs in every NJ county** to ensure a highly-skilled sustainable workforce and gainful employment pathways for NJ youth.
- Support legislation for a **“living wage” for all**, including guaranteed basic income, and extension of sick leave, overtime, and other labor protections for food and agriculture workers. as outlined in the Agricultural Justice Project standards for Food Justice. Supporting CATA, the Farmworker Support Committee, and other members of the Agricultural Justice Project, supports efforts to strengthen the voices of farm and other low-wage workers in advocating for what they need and want in the workplace and in their communities.



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ACTION RECOMMENDATIONS

TABLE 1. PERSPECTIVE OPPORTUNITIES

MULTI-LEVEL

ACTION	SUGGESTED RESPONSIBLE PARTY	TIMELINE
1 Develop opportunities to increase awareness about NJ interconnected and intersectional food system issues for public officials and food system leaders, including an annual State of the Food System Summit.	NJFDC, Rutgers Cooperative Extension, NJDHS, NJDOH, NJDOA, NJEDA	Short-term
2 Increase understanding and awareness of the social & economic determinants of food inequity and health inequity (e.g., household income, access to affordable childcare, healthcare, and housing.)	NJFDC: Healthcare and Local Food Access Work Group	Short-term
3 Convene annual State Food System Summits to advance our collective understanding of food system equity and resilience in NJ.	NJFDC, NJ Philanthropies, State Universities	Ongoing

TABLE 2. PROCESS OPPORTUNITIES

MULTI-LEVEL

ACTION	SUGGESTED RESPONSIBLE PARTY	TIMELINE
4 Provide extension support and grant opportunities in the range of \$5,000-\$50,000 to nonprofit urban farms that are already serving food insecure communities.	NJEDA, NJDOA, NJDHS, Rutgers Cooperative Extension	Long-term
5 Provide grants and other financial and policy supports to urban agriculture enterprises, beginner and BIPOC farm entrepreneurs.	NJEDA, NJDOA, Governor's Office, Rutgers Cooperative Extension, Foodshed Alliance	Long-term

<p>6 Provide state grants for farmers and farmers' markets to receive wireless Point Of Sale (POS) machines for processing SNAP payments.</p>	<p>NJDHS, NJ Legislature</p>	<p>Long-term</p>
<p>7 Utilize health care facilities (i.e. Federally Qualified Health Centers) to promote the consumption of fruits and vegetables and provide information on available access points. (Recommendation from the 2020 NJDOH SNAP-Ed Strategic Plan to Increase Fresh Fruit & Vegetable Access for Low Income Communities)</p>	<p>FQHCs, NJDOH, NJ SNAP-Ed, Healthcare facilities</p>	<p>Short-term</p>
<p>8 Establish and convene a State-level Farm to Institution Working Group to examine research and <u>best practices across the U.S.</u> for creating strong policy, partnerships, and procedures to advance farm to institution in NJ for hospitals, universities, schools, prisons, and other large anchor institutions.</p>	<p>Governor's Office, NJ Farm Bureau, Rutgers Cooperative Extension, NJ Department of Agriculture, NJDOH, NJDOE, NJFDC</p>	<p>Short-term</p>
<p>9 Secure resources and appropriate public agency participation to advance the SNAP-Ed Strategic Recommendations for Increasing Fresh Fruit & Vegetable Access for Low-Income Communities.</p>	<p>NJDOH, NJ Legislature, Governor's Office, NJ Philanthropies</p>	<p>Short-term, Ongoing</p>

STATE-LEVEL

<p>10 Increase enrollment in SNAP by implementing the data-driven recommendations made in the 2021 Report, <u>"Boosting NJ SNAP: Eliminating Barriers to Participation"</u> by Hunger Free NJ.</p>	<p>NJDHS, Hunger Free NJ</p>	<p>Short-term</p>
<p>11 Align all state agency actions and programs to address social determinants of health, including food insecurity. This topic should be a top priority of the New Jersey Food Waste Task Force created under A4705/S3232, when members are named.</p>	<p>Governor's office, NJ Food Waste Task Force</p>	<p>Short-term</p>
<p>12 Provide the necessary regulatory authority, mandates and clear directives to state agencies to operationalize USDA guidance on cross-agency coordination in the food system (e.g. to content federal SNAP, WIC FMNP funds to NJ agricultural products and markets.)</p>	<p>Governor's office, NJ Legislature</p>	<p>Short-term</p>

13 Provide clear guidance and directives to NJ health care systems to screen all patients for food insecurity.	NJDOH, Governor's office	Short-term
14 Eliminate the so-called "Five Acre Rule" that prohibits nonprofit and commercial community farms, and high-yield community gardens providing fresh food to "food desert" and "food swamp" communities from accepting WIC FMNP and Senior FMNP. This is fundamental to building an anti-racist food system in NJ and to building equity and resilience into the food system.	NJDOA, NJDOH, NJ Legislature	Short-term
15 Improve strategic placement of fresh, affordable local food retail, including farmers' markets that accept SNAP, WIC, and Senior FMNP with existing anchor institutions such as federally qualified health centers, schools, public and low-income housing, transportation hubs, and county welfare agency offices.	NJDHS	Short-term
16 Encourage all NJ farmers' markets to be inclusive of all customers; design incentives for each eligible agricultural vendor and/or the entire market to be authorized to accept SNAP, WIC, and S/FMNP. Funding should be provided to enable that access. (e.g. Michigan program provides funding to growers for high tunnels paid for via produce to Head Start families)	NJ DOA, NJDOH, NJDOE, NJDHS, NJ Legislature	Short-term
17 Urge and lobby the USDA to enable markets using diverse e-commerce platforms to accept SNAP online purchases.	Governor's Office, NJ Legislature	Short-term
18 Increase and improve outreach to and training for farmers and farmers' market managers on how to become SNAP authorized from one training per year held in person to at least 4 trainings per year held virtually and in person by 2023.	NJDOH, NJDOA	Short-term
19 Create incentive and training programs for transitioning farming practices towards sequestering carbon, mitigating emissions, or adapting to climate change.	NJ Climate Change Alliance, NJ Legislature, NJ Governor's Office	Short-term

<p>20 Provide training and educational opportunities to leadership in NJ’s FQHCs on how to incorporate fresh food access into primary care delivery.</p>	<p>NJDOH, NJFDC, Rutgers Cooperative Extension</p>	<p>Short-term</p>
<p>21 Advance food equity and climate resilience by creating an urban agriculture infrastructure fund that allows for investment and support personnel/labor in addition to supplies and provides specific support for farmers in food desert and food swamp areas and support for growers practicing regenerative agriculture, carbon farming, and/or implementing climate adaptations to make NJ more food secure in the face of climate change.</p>	<p>NJDOA, NJ Legislature</p>	<p>Long-term</p>
<p>22 Require public input annually on the state’s SNAP Outreach Plan update and increase transparency by allowing the plan to be publicly accessible</p>	<p>NJDHS, NJ Legislature, NJ Governor’s Office</p>	<p>Long-term</p>
<p>23 Clarify the criteria for being able to call a market a “farmers’ market,” encourage and support the new NJ Farmers, Markets, and Growers Coalition, work with food justice and food security leaders in ‘food deserts’ to develop fresh food markets, and problem-solve the food access issue with the individuals who are impacted by it.</p>	<p>NJ Legislature; NJDA; NJEDA</p>	<p>Short-term</p>
<p>24 Assign an inter-agency liaison from each state agency that intersects with the food system and food security whose role is to collaborate with other agency liaisons on interconnected food system issues and programs.</p>	<p>Governor’s office, NJ Legislature</p>	<p>Short-term</p>

UNIVERSITY-LEVEL

<p>25 Create a Regional Food System Coordinator in every Cooperative Extension Office to provide support, training, and grant funds to community-based initiatives that are led by and controlled by residents living in ‘food desert’ communities.</p>	<p>Rutgers Cooperative Extension; NJ Legislature; NJEDA</p>	<p>Short-term</p>
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TABLE 3. COLLABORATION OPPORTUNITIES

MULTI-LEVEL

ACTION	SUGGESTED RESPONSIBLE PARTY	TIMELINE
<p>26 Through State leadership, convene a state 'Food Equity and Resilient Food Systems Council' modeled after similar bodies in other states. This council or Task Force should build on the collaborative food system coalition already developed by the NJ Food Democracy Collaborative -- a coalition of public, private, non-profit and grass-roots organizations developed to coordinate efforts and advance food equity in New Jersey. There should also be (paid) representation from underserved, and limited resource communities of producers and consumers.</p>	<p>Governor's Office, NJFDC</p>	<p>Short-term</p>
<p>27 Fund and implement a statewide fruit and vegetable incentive program, such as the Garden State Good Food Bucks Program, into every county.</p>	<p>NJDHS, NJ's FQHCs, Horizon Blue Cross Blue Shield NJ, City Green NJ, Governor's office, The Food Trust</p>	<p>Long-term</p>
<p>28 Work with appropriate organizations to achieve a minimum of two SNAP-Authorized and/or Double Bucks-Enrolled Farmers' Markets in every NJ county with a focus on areas with high eligibility rates & NJ designated Food Desert Communities.</p>	<p>NJDHS, Sustainable Jersey, Governor's office, County planning offices</p>	<p>Short-term</p>
<p>29 Require and fund the development and deployment of outreach materials (website, app, brochures) in multiple languages to guide SNAP recipients to authorized community markets and farmstands. <u>(To see an example, click here)</u></p>	<p>NJEDA, NJDHS, NJDOA, NJDOH, Governor's office</p>	<p>Short-term</p>
<p>30 Partner with healthcare providers to provide nutrition education in waiting rooms & encourage providers to integrate nutrition education into ongoing services. (Recommendation from the 2020 NJDOH SNAP-Ed Strategic Plan to Increase Fresh Fruit & Vegetable Access for Low Income Communities)</p>	<p>NJDOH, NJ SNAP-ED, FQHCs, Healthcare facilities</p>	<p>Long-term</p>

<p>31 Create an annual benefit reminder system to reach SNAP recipients via mail, text message, or “robocall” reminding them that they can use their benefits to purchase fresh produce from local farms and farmers’ markets. Participants should be directed on how to find the nearest farm market locations, and should be informed about the NJ Good Food Bucks Program (to double their SNAP dollars on local produce) as well as the state’s SNAP-Ed Program.</p>	<p>NJDHS, NJDOA, NJDOH, SNAP-Ed, Governor’s Office</p>	<p>Short-term</p>
<p>32 Optimize the functionality and impact of materials sent to enrolled SNAP participants (i.e. the “mailer” letter) so that it clearly guides and encourages participants on information about state programs and resources for maximum utilization, such as NJ SNAP.gov; social media resources, and local SNAP-Ed resources. Specifically, the mailers should include or clearly direct participants to a current list of farmers’ markets that are authorized to accept SNAP, and identify which of those markets participate in the USDA-funded Garden State Good Food Network’s “Double Bucks” Program.</p>	<p>NJDHS, County Boards of Social Services, NJ Legislature, Governor’s Office</p>	<p>Short-term</p>
<p>33 To improve access to affordable food, health plans (such as Medicaid, Medicare) and payers/insurers should partner with healthcare providers and community-based organizations to invest in and implement produce prescription programs. Through these programs, patients receive coupons redeemable for fruits and vegetables at local retail settings including farmers markets and grocery stores.</p>	<p>NJ health insurance providers</p>	<p>Long-term</p>
<p>34 Utilize health care facilities (i.e. Federally Qualified Health Centers) to promote the consumption of fruits and vegetables and provide information on available access points. (Recommendation from the 2020 NJDOH SNAP-Ed Strategic Plan to Increase Fresh Fruit & Vegetable Access for Low Income Communities)</p>	<p>FQHCs, NJDOH, NJ SNAP-Ed, Healthcare facilities</p>	<p>Long-term</p>

STATE-LEVEL

<p>35 Formally adopt the NJFDC food system Roadmap.</p>	<p>Governor's Office, All Revenant State Department Leadership</p>	<p>Short-term</p>
<p>36 Convene a State Level cross-departmental task force to address issues of the food system including: food security and food access and food production between NJDOA, NJDHS, NJDOH, NJEDA and other relevant agencies.</p>	<p>Governor's Office, All Revenant State Department Leadership</p>	<p>Short-term</p>
<p>37 Require state agencies to maintain and share a public-facing, searchable, and user-friendly list of all NJ SNAP-authorized farms and farmers' markets from USDA FNS, including markets where they can utilize nutrition incentive and matching dollar programs such as the Garden State Good Food Bucks, or contract with a third party to do so, as is done in other states.</p>	<p>NJDOH, NJDHS, NJDOA, and NJDOE, NJ Legislature, Governor's office</p>	<p>Long-term</p>
<p>38 Provide adequate funding to make critical functionality and food equity upgrades to the Find Jersey Fresh website; besides being mobile-friendly and multilingual, NJ residents should be able to easily search for places where they can use their WIC FMNP and SNAP. Users should also be able to easily distinguish farms that are practicing "Climate Friendly" farming methods.</p>	<p>NJDOA, NJ Legislature</p>	<p>Short-term</p>
<p>39 Create an integrated online "portal" for all state-managed food access and security resources, modeled after the federally approved EatFresh.org tool. The front-end of this website can be adapted to align with SNAP and/or Jersey Fresh branding. NJ SNAP's website should also survey visitors to capture data on the effectiveness of their outreach and communication efforts.</p>	<p>NJDHS, NJ SNAP, NJDOH, SNAP-Ed</p>	<p>Short-term</p>
<p>40 Direct NJDHS to provide robust resources and training to case workers at County Boards of Social Services & SNAP outreach vendors for current and complete information to SNAP eligible and enrolled individuals about how to maximize the use of their benefits (e.g., produce incentive programs, double SNAP, purchasing seeds and plants, and discounts)</p>	<p>Governor's office; NJ Legislature</p>	<p>Long-term</p>

<p>41 Produce an annual state Food Equity Report: require agencies to collaborate to produce and share a report on the state of the food and agricultural system, with a focus on equitable access and resilience. This report could include data on:</p> <ul style="list-style-type: none"> - SNAP, WIC, and FMNP redemption at farm stands and farmers' markets (redemption data should be provided by the WIC office to identify where improvements can be made; this information is already gathered by the state but not publicly available); - the number of SNAP-eligible and enrolled individuals and families by county; - outreach tools implemented in each county to increase the ratio of SNAP-enrolled to eligible families; - assessment reporting on the effectiveness of the outreach and communication strategies used by NJDHS to reach SNAP-enrolled families and individuals about maximizing the full range of their benefits; - how SNAP outreach funding is spent; - how farmers of color are being supported. 	<p>NJDOH, NJDHS, NJDOA, NJ Legislature, Governor's Office</p>	<p>Long-term</p>
<p>42 Leadership within the state's Office of Food Security Advocate should work with the NJFDC network to adopt and advance an equitable food system approach.</p>	<p>NJFDC, Office of Food Insecurity Advocate</p>	<p>Short-term</p>
<p>43 Create one integrated state social media account to communicate and disseminate information about state food access and community agriculture programs such as SNAP, SNAP-ED, WIC, Senior FMNP, Jersey Fresh, and other agricultural and food-related information.</p>	<p>Governor's Office; NJ Legislature</p>	<p>Short-term</p>
<p>44 Create, mandate, and fund a branding, communication, and marketing effort to remove the stigma around food assistance programs like SNAP both among eligible and enrolled New Jerseyans, and among growers/producers at markets or farm stands.</p>	<p>NJDHS, NJ SNAP, NJDOH, SNAP-Ed</p>	<p>Short-term</p>

UNIVERSITY-LEVEL

<p>45 Provide an appropriate liaison from relevant university departments to participate in the Food System Research Working Group.</p>	<p>State universities</p>	<p>Short-term</p>
<p>46 Incentivize and train Rutgers Master Gardener volunteers to conduct their volunteer work in underserved communities, or distribute volunteer hours equitably within counties. Use innovative methods to recruit and train volunteers to enable greater participation from low-income and underserved communities.</p>	<p>Rutgers Cooperative Extension</p>	<p>Long-term</p>
<p>47 Given the increasing problem of food insecurity on college campuses, support all efforts to increase food security, including providing assistance for SNAP enrollment and providing emergency food.</p>	<p>Rutgers Cooperative Extension, contracted state SNAP outreach and SNAP-Ed providers, food banks</p>	<p>Long-term</p>
<p>48 Support a robust research agenda on food access and food system equity and resilience and prioritize participatory action research within 'food desert' communities.</p>	<p>NJFDC Research Working Group, state universities, philanthropic organizations</p>	<p>Short-term</p>
<p>49 Support the development of community and school gardens in 'food desert' communities.</p>	<p>Rutgers Cooperative Extension, state universities, philanthropic organizations</p>	<p>Short-term</p>

NONPROFIT/COMMUNITY-LEVEL

<p>50 Foster the development of county, regional, and local food policy councils.</p>	<p>NJFDC, Rutgers Cooperative Extension, Sustainable Jersey, NJ SNAP-Ed</p>	<p>Short-term</p>
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51 Create a state-level food system resilience and food justice strategy in coordination with leading food justice and health equity groups that integrate the New Jersey Climate Change 80 x 50 Plan, The Food Trust's Strategic Plan for Fresh Food Access in NJ, the Organic Materials Management Plan from the NJ Climate Change Alliance, and other data and recommendation from state agencies and NGOs such as Hunger Free NJ.

NJFDC, Rutgers Cooperative Extension, Sustainable Jersey, The Food Trust

Short-term

52 Hire, and promote to leadership positions, residents living in 'food deserts' to develop food access initiatives.

Government and non profit organizations

Short-term

SUMMARY STATEMENT

The goal of this *Roadmap* has been to synthesize the perspectives of the numerous stakeholders whose research and insights have shaped the discussions within the NJFDC as well as between the NJFDC and various collaborators and policymakers. We view this as a living document that will evolve as the food policy debate in NJ evolves.

Beyond the specifics of the policy agenda, the *Roadmap* argues that for meaningful progress to be made on crafting a *resilient, democratic, equitable, and just* food system we must start with a perspective and a process that grounds the discussions of food security and the food system in the realities of the lives and livelihoods of the people upon whom the system relies for its very existence, and the environment and natural resources upon which it depends for its very survival. New Jersey's landmark acceptance of environmental justice as a framework across governmental agencies has already acknowledged this basic fact by adopting the EPA's definition of environmental justice:

"the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies."

The NJFDC supports the extension of this basic idea to the governance of the NJ food system. Justice is not merely a desirable element of a sustainable, equitable, and resilient food system -- it is a necessary dimension. And that perspective can only be operationalized by a process that provides the conditions for the meaningful involvement of all people -- the democratic participation of all people -- in its governance. We look forward to working with all those individuals and organizations committed to making such a food system possible.



REFERENCES

INTRODUCTION

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6 United States Department of Agriculture. (2020). Farmers' Markets Accepting SNAP Benefits. <https://www.fns.usda.gov/snap/farmers-markets-accepting-snap-benefits>

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From: [New Jersey Environmental Lobby](#)
To: [SADCPublicComments, NJDA \[AG\]](#)
Cc: senbsmith@njleg.org
Subject: [EXTERNAL] Approve the proposed Soil Protection Standards
Date: Monday, November 13, 2023 9:13:24 AM

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The New Jersey Environmental Lobby urges approval of the soil protection standards proposed by the SAC.

The proposed standards are not onerous and are vital to ensure that the purpose of farmland preservation is not undermined by a few owners who try to violate the conditions of the program. Some usages that have been attempted would clearly violate the agreement to refrain from activities that "would be detrimental to drainage, flood control, water conservation, erosion control, or soil conservation."

These standards are by no means onerous and provide for waivers. The funds for farmland preservation are provided by New Jersey taxpayers. The taxpayers have the right to have their ecological interests protected.

Sincerely,

Anne O. Poole

President

New Jersey Environmental Lobby

204 West State Street

Trenton, NJ 08608

e-mail: jell@earthlink.net

<http://www.njenvironment.org>

From: [Elliott Ruga](#)
To: [SADCPublicComments, NJDA \[AG\]](#)
Cc: [Smith B., Sen. D.O.](#)
Subject: [EXTERNAL] Comments on Proposed New Rules at NJAC 2:76-25 and 25A,
Date: Monday, November 13, 2023 2:11:50 PM

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This message came from an **EXTERNAL** address (elliott@njhighlandscoalition.org). **DO NOT** click on links or attachments unless you know the sender and the content is safe.

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Re: Proposed New Rules, Soil Disturbance on Preserved Farmland and Supplemental Soil Disturbance Standards at N.J.A.C. 2:76-25 and 25A

Dear Members of the New Jersey Agricultural Development Committee:

The protection of agriculture as a viable business and lifestyle in the New Jersey Highlands is one of the objectives of the 2004 Highlands Water Protection and Planning Act. Family-run farms are seen throughout the Highlands. In Warren, Hunterdon and parts of Morris County and Somerset counties, farms are prevalent features of the landscape. They significantly contribute to the regional economy. Agriculture is an intrinsic part of the identity and character of the Highlands.

According to the Garden State Preservation Trust (GSPT), between 1985 and 2020, 588 farms in the Highlands representing 44,374 acres in 45 towns, in all 7 Highlands counties, were preserved using GSPT funds.

Last week county and state officials, environmental advocates and thousands of concerned citizens cheered when it was announced that after a 4-year battle, the SADC would purchase 575-acres of prime agricultural soils on adjacent farm parcels that were proposed for a warehouse development. In an interview with NJ Spotlight News, State Senator Doug Steinhardt said in response to the announcement that, "the ultimate outcome is that this is what happens when good people get together for good causes--they produce good outcomes."

We all want to see that farming continues its presence in the Highlands and in the Garden State. The New Jersey Highlands Coalition, in representing its 112 member organizations, supports the important work of the SADC. We also appreciate that in adopting rules that determine the agricultural practices that are allowed on Preserved Farm, there must be some flexibility to allow preserved farms to engage in activities that are not seen as traditional farming, such as hay rides, harvest festivals, farm-to-table experiences and farm-related public events.

But every measure should be taken to protect the underlying resource that crop cultivation depends on--farm soils. High quality, productive soils are not artificially created with chemical treatments and the application of fertilizers and nutrients. They are entirely dependent on the underlying geology. Once good soils are removed they cannot be replaced and the State's

inventory of productive farmland soils are effectively reduced for good.

That is why we support the proposed limits of 12% soils disturbance on a Preserved Farm under the new standards currently proposed. From our perspective, it is not ideal, but it is an acceptable compromise in order that a Preserved Farm can compete with a private farm.

If we wish to protect farming as a viable and profitable business, we must protect our most productive farm soils. Thank you.

--

Elliott Ruga, Policy & Communications Director
New Jersey Highlands Coalition
508 Main St, Boonton, NJ 07005
973-588-7190 x2 (office)
973-722-4934 (mobile)



222 West State Street, Trenton, New Jersey 08608
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EMAIL league@njlm.org • www.njlm.org

Michael F. Cerra, EXECUTIVE DIRECTOR

Loretta Buckelew, ASSISTANT EXECUTIVE DIRECTOR

November 6, 2023

Transmitted Via Email: SADC@ag.state.nj.us

Susan E. Payne, Executive Director
State Agriculture Development Committee
PO Box 330
Trenton, New Jersey 08625-0330

Re: PRN 2023-079; N.J.A.C. 2:7-25 and 25A

Dear Executive Director Payne,

Please accept these comments on behalf of the New Jersey State League of Municipalities (“League”) regarding the proposed new rules at N.J.A.C. 2:7-25 and 25A associated with PRN 2023-079, also referred to as “soil protection standards.” The League has reviewed this proposal and supports the adoption.

The League has long supported the state’s farmland preservation program which since its inception has preserved almost 248,000 acres. The purpose of the program is to maintain a stronger land base to support the agriculture industry within our state. It is meant to keep New Jersey green, to limit urban sprawl, and to protect our water and soil. To further this noble purpose the state, counties and municipalities have dedicated hundreds of millions of taxpayer dollars to preserve farmland by purchasing easements and development rights.

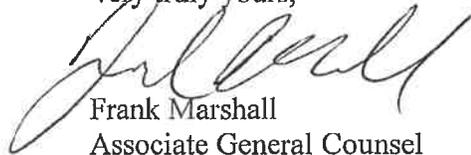
The goals of preservation are undermined, however, when preserved farmland is used in a manner that could permanently prevent it from being used for agricultural purposes. One of the biggest factors contributing to the reduction of farmland for agricultural purposes is the destruction of productive soil. Soils can be destroyed or made unproductive by a variety of ways that are far outside typical farming practices. That is to say that not all soil on farms need be used for the growing of crops.

Indeed, loading, and staging areas, travel lanes for equipment, and other such uses are all typical and necessary for a working farm. The proposed rules at N.J.A.C. 2:7-25 and 25A have been well crafted to account for these uses while also ensuring that most of the preserved farmland remains available for productive agriculture purposes now and into the future. Not only are the limitations fair, with nearly all preserved farms being well within the threshold, but there are additional opportunities for preserved farms to extend beyond the limitations through waivers.

The League fully supports these rules and encourages the SADC to continue their efforts to ensure that preserved farmland remains primarily dedicated to agricultural production activities and does not become a mere backdrop for nonagricultural uses.

Thank you for your consideration of the League's comments. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Frank Marshall', written in a cursive style.

Frank Marshall
Associate General Counsel
New Jersey State League of Municipalities

Uttal, Jessica [AG]

From: Skylands Preservation Alliance <skylandspa@gmail.com>
Sent: Sunday, November 12, 2023 9:57 AM
To: SADCPublicComments, NJDA [AG]
Subject: [EXTERNAL] Soil Protection Rules for Preserved Farms

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To Whom it May Concern:

I read with interest the recent op-ed by Jim Waltman about the proposed compromise rules to limit impervious cover and other forms of disturbances on preserved farms. I would like to voice the support of the Skylands Preservation Alliance to preserving the rules as written and scrapping any kind of loosening of these needed protections. New Jersey should remain known as the Garden State, in spite of our already extensive petrochemical, construction, ozone, and soil contamination. Let's stop it already. Thank you.

Tracey Heisler
Board President
Skylands Preservation Alliance

From: [Charles Loflin](#)
To: [SADCPublicComments, NJDA \[AG\]](#)
Subject: [EXTERNAL] Comments on Rules for protecting NJ Soils
Date: Monday, November 6, 2023 4:26:26 PM
Attachments: [PastedGraphic-2.tiff](#)

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Dear SADC members:

UU FaithAction NJ promotes regenerative agriculture and food security through our Environmental Justice Task Force.

We recognize the importance of healthy, fertile soils in producing the high quality fruits and vegetables that New Jersey is famous for. We therefore support the current standards proposed by the State Agriculture Development Committee to protect soils on farms preserved by the Farmland Preservation Program from being used and abused for reasons other than food production.

Thank you for taking our comments.

Sincerely,

Rev. Charles Loflin, Executive Director
Pronouns: he/they



4 Waldron Avenue | Summit, NJ 07901
execdir@uufaithaction.org | 973-303-8990 (cell)
Follow: [fb.com/uufaithactionnj](https://www.facebook.com/uufaithactionnj)

(formerly the Unitarian Universalist Legislative Ministry of NJ)

February 23, 2024

Susan E. Payne, Executive Director
State Agriculture Development Committee
PO Box 330
Trenton New Jersey 08625-0330

Re: Soil Disturbance on Preserved Farmland and Supplemental Soil Disturbance Standards Proposed New Rules: N.J.A.C. 2:76-25 and 25

Dear Ms. Payne,

On behalf of New Jersey Conservation and the undersigned organizations, we are writing to urge the immediate adoption of the soil disturbance standards proposed rules. We appreciate the State Agriculture Development Committee's (SADC) many years of hard work to complete these standards so that irreplaceable soil resources on preserved farmland will be protected.

As you know, it has been six years since the NJ Supreme Court ordered the SADC to set clear limits on soil destruction on preserved farms, after the lengthy legal battle over a case of severe soil destruction on preserved farmland in Hunterdon County.

Although we feel the SADC's proposal should be stronger in protecting our state's irreplaceable soils, because there is currently no limit whatsoever on the amount of soil disturbance allowed within the Farmland Preservation deed of easement, these standards should be immediately adopted without further weakening. It is critical that the standards apply retroactively as currently written.

Soil protections have not historically been a significant barrier to landowner participation in farmland preservation programs. Thousands of acres have been preserved in New Jersey using the federal Agricultural Land Easement program (formerly the Farm and Ranch Lands Protection Program), which has a 2% limit on impervious cover, with a waiver up to 10%. Many owners of farmland in New Jersey have accepted, and continue to accept, this limit. The program is also very popular across the United States. New York State's farmland preservation program has a 10% cover limit and it continues to be successful in protecting farms.

The SADC ranks farms on their soil quality, and it makes good sense to protect those soils that taxpayers have paid to permanently preserve for agriculture. It is critically important that we steward in perpetuity the land and soils so that we garner the full agricultural production and natural resource protection benefits the program promises to taxpayers.

Additionally, 91% of preserved farms currently have less than 4% soil disturbance, and 95% have less than 4 acres of disturbance; most of New Jersey's preserved farms do not even come close to having the amount of soil destruction that these standards would allow.

Given the threats we face from the climate crisis and the role healthy soils play in carbon sequestration, protecting New Jersey's soils should be a main component of New Jersey's Farmland Preservation Program.

Thank you for your consideration of our comments. Please contact Amy Hansen, Policy Manager at New Jersey Conservation Foundation at amy@njconservation.org or 908-234-1225 with any questions.

Sincerely,

Alison Mitchell, Co-Executive Director, New Jersey Conservation Foundation
Cali Alexander, Policy Chair, Board of Directors, Northeast Organic Farming Association of New Jersey
Doug O'Malley, Director, Environment New Jersey
Mark Canright, Farmer/Owner, Comeback Farm
Bill Kibler, Director of Policy, Raritan Headwaters Association
Jaclyn Rhoads, Assistant Executive Director, Pinelands Preservation Association
Nora Pugliese, Farm Manager, Ethos Farm to Health
Jeff Tober, Farm Manager, Rancocas Creek Farm
Janet Eisenhower, Board President, South Jersey Land and Water Trust
Jen Coffey, Executive Director, Association of NJ Environmental Commissions
Julia Somers, Executive Director, New Jersey Highlands Coalition

From: [Amy Hansen](#)
To: [SADC; SADCPublicComments, NJDA \[AG\]](#)
Cc: [Alison; jay; Alix Bacon](#)
Subject: [EXTERNAL] Letter regarding soil protection standards
Date: Friday, February 23, 2024 4:10:18 PM
Attachments: [1.23.2024 SADC soil disturbance standards comments.doc](#)

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Dear Susan,

Please find the attached letter from NJ Conservation and others urging the SADC to adopt the soil protection standards as published in the NJ Register in August 2023.

Thanks very much for your hard work on this. If additional groups sign on, I will forward their names to you.

Best regards,

Amy

Amy Hansen (she, her)

Policy Manager

New Jersey Conservation Foundation

Bamboo Brook

170 Longview Rd

Far Hills NJ 07931

732-356-9455

www.njconservation.org

From: [Uttal, Jessica \[AG\]](#)
To: [Uttal, Jessica \[AG\]](#)
Subject: RE: Soil protection standard exemption suggestions
Date: Friday, February 23, 2024 9:57:42 AM

From: Meredith Melendez <melendez@njaes.rutgers.edu>
Sent: Friday, February 23, 2024 8:49 AM
To: Payne, Susan [AG] <Susan.Payne@ag.nj.gov>
Subject: [EXTERNAL] Soil protection standard exemption suggestions

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Susan,

Several members of the Mercer County Board of Agriculture worked with me on suggested additions and concerns with the SPS exemption list. See below:

Define: “nominal” grading, “nominal” tents, “temporary” when it comes to a timeframe for certain activities.

There were concerns with the process for approval for rehabilitation of soils being more onerous than required to return soil to productive farmland. There may be certain circumstances where the remediation need is significant and others where it is not. Perhaps a modified process for typical farm uses that could require rehabilitation, or at least language that would allow for that to occur to avoid a one-size-fits-all approach to the rehabilitation process.

Alteration	Surfacing	Compaction
Current: Cranberry bogs/beds Deep tillage Existing open ditches Existing ag water impoundments Nominal smoothing On-farm utilities Rehabilitated soils Topsoil stockpiles Underground drainage systems	Geotextile fields Hoophouses Nominal tents Organic mulch Rehabilitated soils Solar panels Temporary geomembranes Temporary ground protection mats Temporary movable structures Temporary tents (days?)	Normal tillage Rehabilitated soils Temporary parking areas Temporary storage areas Unimproved livestock areas Unimproved travel lanes
Should also	Define hoophouse uses –	Pastures

<p>include:</p> <ul style="list-style-type: none"> Municipal leaf piles Mulch piles Sand piles used for soil mixes and floors in production spaces Soil mix components (bales of soilless media, sand, bark, etc.) Soil amendment piles Soil brought in to refill holes left in nursery, shrub, and tree locations Woodchip piles Composting active areas and finished compost 	<ul style="list-style-type: none"> include landscape fabric flooring, bare ground flooring, sand flooring, gravel flooring High tunnels Caterpillar tunnels Temporary tents for as long as the season requires (max 9 months?) Silage tarps / other tarping used for weed management 	
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Thanks,
Meredith

Meredith Melendez
Associate Professor
County Agent II
Rutgers NJAES Cooperative Extension of Mercer County
1440 Parkside Avenue Ewing, NJ 08638
P:609-989-6830

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