

DEPARTMENT OF STATE
NEW JERSEY STATE PLANNING COMMISSION
P.O. BOX 820
TRENTON, NEW JERSEY 08625-0820

PHILIP D. MURPHY
Governor

LT. GOVERNOR TAHESHA L. WAY SECRETARY OF STATE

THOMAS K. WRIGHT

CHAIRMAN

WALTER C. LANE
Acting Executive Director/Acting Secretary

New Jersey State Planning Commission Minutes of the Meeting Held on August 6, 2025 Zoom Video Conference

CALL TO ORDER

Chairman Wright called the August 6, 2025, video conference of the New Jersey State Planning Commission (SPC) to order at 10:33 a.m.

OPEN PUBLIC MEETINGS ACT

It was announced that notice of the date, time, and place of the meeting had been given in accordance with the Open Public Meetings Act.

ROLL CALL

Members Present

Danielle Esser, Director of Governance, NJ Economic Development Authority (joined at 10:37 a.m.) Joe Grillo, Designee for President Christine Guhl-Sadovy, Board of Public Utilities (joined at 10:49 a.m.) Susan Weber, Designee for Francis K. O'Connor, Commissioner, Department of Transportation Bruce Harris, Municipal Member

Nick Angarone, Designee for Shawn LaTourette, Commissioner, Department of Environmental Protection Keith Henderson, Designee for Jacquelyn Suarez, Commissioner, Department of Community Affairs Elizabeth Terenik, Public Member

Melanie Willoughby, Designee for Lt. Governor Tahesha Way, Secretary of State, Department of State Stephen Santola, Public Member Julia Somers, Public Member Jeffrey Oakman, Public Member Thomas Wright, Chairman

Others Present through Video conference

See Attachment A

PLEDGE OF ALLEGIANCE

Chairman Wright asked everyone to stand for the Pledge of Allegiance.

APPROVAL OF MINUTES

Chairman Wright asked for a motion to approve the minutes of July 2, 2025, with no changes. Julia Somers made the motion, and Stephen Santola seconded it. With no further discussion or questions, Chairman Wright asked for a roll call vote: Ayes: (10) Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Elizabeth Terenik, Melanie Willoughby, Stephen Santola, Julia Somers, Jeffrey Oakman, and Thomas Wright. Nays: (0) Abstains: (0) The July 2, 2025, minutes were approved.

CHAIRMAN'S COMMENTS

Chairman Wright indicated that his comments would be brief due to the packed agenda. He thanked the Commissioners who participated in the Negotiation Sessions (NS) conducted by the Office of Planning Advocacy (OPA) staff and the counties. Chairman Wright made note of the collaborative efforts made during the meetings to work through issues and was proud to be a part of the process. He looked forward to reading the Impact Assessment (IA) in more depth.

Commissioner Somers shared that she participated in several NS and complimented staff on the collaborative nature of the Sessions. She also noted that the Sessions were efficiently run, with OPA setting a tone of professional respect.

With that, Chairman Wright ended his comments and ceded the floor to Acting Executive Director (AED) Walter Lane for his report.

ACTING EXECUTIVE DIRECTOR'S REPORT

Since the July 2 SPC meeting:

AED Lane provided a brief overview of the Office's work since the July State Planning Commission (SPC), with the exception of State Plan updates, which would be covered later in the meeting.

Plan Endorsement

- Staff is working with numerous towns to achieve Plan Endorsement (PE) status and is asking the Commission to consider approving PE for the Borough of Seaside Heights and the Town of Dover.
- Staff hopes to bring the PE petitions for several additional towns' petitions to the upcoming Plan Implementation Committee (PIC) and SPC meetings.

AED Lane noted that although OPA is focused on updating the State Plan, a great deal of work continues regarding PE.

Staff also attended a large number of meetings, such as but not limited to:

The Interagency Council on Extreme Heat, NJCPA Statewide Planning/Smart Growth Committee, numerous meetings with DEP partners on mapping for PE applications, New Jersey Coastal Coalition Meeting, SJTPO TAC Meeting, the New Jersey Bayshore Council Meeting, and the Practitioner Panel on the 3rd New Jersey Sea Level Rise and Coastal Storms Report.

Lastly, AED Lane reported that OPA's GIS Specialist, Naomi Barnes, retired as of July 31, 2025 and will be sorely missed. OPA is actively working to fill her position.

With no questions or comments from the Commission, Chairman Wright asked Senior Planner, Lisa Avichal to present the PE petition for the Borough of Seaside Heights.

NEW BUSINESS

<u>Plan Endorsement of the Borough of Seaside Heights</u>

Before Ms. Avichal began her presentation, Chairman Wright asked if any members of the municipality wished to comment. Chris Vaz, Borough Administrator, and Jennifer Gorini thanked OPA staff for working together with them on this project.

Ms. Avichal proceeded to present the Borough of Seaside Heights Plan Endorsement petition. The presentation can be found at: https://www.nj.gov/state/bac/planning/documents/meeting-materials/seaside-heights-spc-presentation-8-7-2025.pdf

Ms. Bennett made note that Commissioners Esser and Grillo joined the meeting since the last vote.

Resolution 2025-06 Adopting the Plan Endorsement Petition for the Borough of Seaside Heights, Ocean County, and Designating One Town Center

The Resolution can be found at: https://www.nj.gov/state/bac/planning/documents/resolutions/seaside-beights-resolution-2025-06-certified.pdf

With no further discussion or questions, Chairman Wright asked for a motion to approve Resolution 2025-06. The motion was made by Melanie Willoughby and seconded by Jeffrey Oakman. Chairman Wright asked for a roll call vote. Ayes: (12) Danielle Esser, Joe Grillo, Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Elizabeth Terenik, Melanie Willoughby, Stephen Santola, Julia Somers, Jeffrey Oakman, and Thomas Wright Nays: (0). Abstains: (0) Resolution 2025-06 was approved.

With no questions or comments from the Commission, Chairman Wright asked Senior Planner Steven Simone to present the PE petition for the Town of Dover.

Plan Endorsement of the Town of Dover

Before Mr. Simone began his presentation, Chairman Wright asked if any members of the municipality wished to comment.

AED Lane reported that the municipal staff had been great partners and had attended the PIC meeting, but may not be available to join the SPC.

Mr. Simone proceeded to present the Town of Dover Plan Endorsement petition. The presentation can be found at:

https://www.nj.gov/state/bac/planning/documents/meeting-materials/dover-spc-presentation-8-6-2025.pdf

Resolution 2025-07 Adopting the Plan Endorsement Petition for the Town of Dover, Morris County, and Designating One Regional Center

The Resolution can be found at: https://www.nj.gov/state/bac/planning/documents/resolutions/dover-resolution-2025-07-certified.pdf

With no further discussion or questions, Chairman Wright asked for a motion to approve Resolution 2025-07. The motion was made by Julia Somers and seconded by Bruce Harris. Chairman Wright asked for a roll call vote. Ayes: (12) Danielle Esser, Joe Grillo, Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Elizabeth Terenik, Melanie Willoughby, Stephen Santola, Julia Somers, Jeffrey Oakman, and Thomas Wright Nays: (0). Abstains: (0) Resolution 2025-07 was approved.

Alex Doherty of Dover joined the meeting and expressed excitement at collaborating with OPA to improve the town. He looked forward to working together to facilitate best planning practices, community development, and utilizing existing infrastructure.

With no questions or comments from the Commission, Chairman Wright asked Ms. Avichal to discuss the Impact Assessment and introduce the consultant team. He noted that AED Lane and Mr. Simone would not be participating in the upcoming discussion due to their previous recusals. Chairman Wright then requested that Sara Bennett move AED Lane and Mr. Simone to the Zoom waiting room.

Ms. Bennett reported that AED Lane and Mr. Simone had been moved to the Zoom waiting room.

Resolution 2025-08 Approval of the State Plan Impact Assessment

Ms. Avichal provided a quick recap on the status of the IA. According to the State Planning Act, the IA will describe the impacts of the policies and strategies proposed in the Plan relative to the impacts of what would likely occur without a Plan. OPA is required to distribute the IA to the Governor, legislature, and the governing bodies of each county and municipality, as well as the general public, and it must be made available for public comment for a period extending from 45 days before the first public hearing to 30 days following the last of those hearings. After consideration of the results of the IA, the SPC may choose to either amend or not amend the draft final State Development and Redevelopment Plan as appropriate.

Rowan and Rutgers Universities continue to work on the executive summary of the IA, which will be provided to the Commission to be adopted at a future SPC meeting. She noted the necessity for the Commission to approve the release of the final IA at today's meeting. Any delay would impact OPA's ability to meet the rest of the timeline to adopt the final Plan in December.

Ms. Avichal referred the presentation to the consultant team.

Dr. Kevin Keenan, Dr. John Hasse, Dr. Qian He, and Dr. Mahbubur Meenar of Rowan University, and Leigh Ann Von Hagen and Samuel Rosenthal of Rutgers University proceeded to present on the IA.

The presentation can be found at: https://www.nj.gov/state/bac/planning/documents/meeting-materials/ia-presentation-8-6-2025.pdf

The State Plan Impact Assessment can be found at: https://www.nj.gov/state/bac/planning/documents/update-to-state-plan/final-sdrp impact assessment 20250806.pdf

Chairman Wright thanked the consultant team for their presentation and opened the floor for Commissioner comment.

Commissioner Somers observed that the change in how the state developed was almost concurrent with the passage of the Highlands Act, which has been successful in helping move toward redevelopment. The ensuing discussion with Commissioners and consultants noted that an overarching theme of the report was the increase in density, units per acre, in almost every county since 2001.

Commissioner Harris thanked the consultants for their presentation and asked who the intended audience for the document was, bearing in mind the length and complexity of the content. He emphasized the importance that the citizens, legislators, and local and county officials are presented with a document that they will both read and understand. He also shared that he submitted five pages of comments to AED Lane, who forwarded the same to the consultant team.

The ensuing discussion among the Commissioners and consultants concluded that there are multiple audiences, including the OPA, the SPC, local and state officials, and most importantly, the people of the State of New Jersey. Chairman Wright added that the IA is written as a technical, dense document to meet statutory requirements and to support the ongoing Cross Acceptance Process. The consultant team continues work on the executive summary, which will be a shortened and more digestible document, providing key points from both the quantitative and qualitative analyses.

Commissioner Angarone emphasized that the language in the State Plan does not, in itself, result in change; rather, it is the advocacy for the policies therein that leads to improvements. The purpose of the IA and the State Plan is to serve as the vision for how development should occur in the state. The presentation on the IA showed that if the policies of the proposed draft State Plan are implemented through state agencies and at the local level, the result will be more equity, more sustainable and resilient development, additional economic growth, and protection of our natural resources. Commissioner Henderson concurred and opined that the State Plan also brought an important level of education to the minds of decision-makers throughout the state, and as such, the tone and context of the language in the document are important.

The group discussed the guidelines regarding changes to the IA after the SPC voted to release the document at the current meeting, and Chairman Wright requested that AED Lane rejoin the meeting to talk about the timeline. Ms. Bennett returned AED Lane to the meeting from the Zoom waiting room. AED Lane stated that the Commission could empower OPA staff to make requested changes after the release, to which the Commission members agreed. Before the vote, Ms. Bennett moved AED Lane back to the Zoom waiting room.

With no further discussion or questions, Chairman Wright asked for a motion to approve Resolution 2025-08. The motion was made by Melanie Willoughby and seconded by Danielle Esser. Chairman Wright asked for a roll call vote. Ayes: (12) Danielle Esser, Joe Grillo, Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Elizabeth Terenik, Melanie Willoughby, Stephen Santola, Julia Somers, Jeffrey Oakman, and Thomas Wright Nays: (0). Abstains: (0) Resolution 2025-08 was approved.

Before moving to the next agenda item, Resolution 2025-09 Approval to Release the Draft Statement of Agreements and Disagreements (SAD), Chairman Wright made note that as Commissioners Somers and Robinson had recused themselves from any Sourlands matters, they would not participate in the upcoming discussion. Additionally, AED Lane and Mr. Simone would not participate due to their previous recusals.

Chairman Wright requested that Ms. Bennett move all parties to the Zoom waiting room. Ms. Bennett reported that Commissioner Robinson was not in attendance at the meeting, but that Commissioner Somers would be moved to the Zoom waiting room to join AED Lane and Mr. Simone. That being done, Chairman Wright asked Assistant Planner Felix Zamora to provide a brief update on the Draft Statement of Agreements and Disagreements.

Resolution 2025-09 Approval to Release the Draft Statement of Agreements and Disagreements (SAD)

Mr. Zamora proceeded to present a detailed review of the negotiation process and outcomes. Negotiation Sessions (NS) were held for all 21 counties and the Highlands after which OPA produced two interim reports. Upon completion of the NS, the SPC's negotiation committee determined that the negotiations produced the highest degree of agreement feasible, and the negotiation phase of Cross Acceptance was complete.

Of the 555 items in Appendix A discussed during the NS, the agreement rate was approximately 97%. Appendix B detailed actions to be taken by OPA in the course of producing the draft final SDRP. The Negotiating Entities were informed that draft language to address their issues and comments on both Appendices would be provided in the revised draft scheduled to be approved for release in September.

The Draft Sad can be found here:

https://www.nj.gov/state/bac/planning/documents/update-to-state-plan/draft sad 2025 reformatted.pdf

Chairman Wright expressed appreciation for the clear and easy-to-understand presentation of the SAD, including both the specific comments and the broader context. He confirmed with Ms. Avichal that the purpose of Resolution 2025-09 is to release the draft SAD, which the Commission cannot act on for 14 days. During those 14 days, the Commission may review the document. After such time, the final can be approved, and changes can be made to the Plan.

With no further discussion or questions, Chairman Wright asked for a motion to approve the release of the Draft Statement of Agreements and Disagreements (SAD). The motion was made by Melanie Willoughby and seconded by Bruce Harris. Chairman Wright asked for a roll call vote. Ayes: (10) Danielle Esser, Joe Grillo, Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Melanie Willoughby, Stephen Santola, Jeffrey Oakman, and Thomas Wright Nays: (0). Abstains: (0) The Special State Planning Commission Meeting for July 30, 2025, was approved. Elizabeth Terenik had left the meeting and did not vote. Julia Somers was recused on this matter and did not vote.

Before requesting that AED Lane present the next agenda item, Chairman Wright requested that Ms. Bennett move AED Lane, Mr. Simone, and Commissioner Somers from the Zoom waiting room back to the meeting. Ms. Bennett reported that all parties had rejoined the meeting.

Approval of Changing the September State Planning Commission Meeting Date to September 10, 2025

AED Lane stated that, as discussed in June, the group agreed to move the September 3, 2025, SPC meeting to September 10, 2025, to provide additional time for OPA to prepare the revised Draft for review by the Commission. He noted that the PDC meeting would be held as scheduled on September 3, 2025.

With no further discussion or questions, Chairman Wright asked for a motion to approve changing the September State Planning Commission Meeting date to September 10, 2025. The motion was made by Jeffrey Oakman and seconded by Melanie Willoughby. Chairman Wright asked for a roll call vote. Ayes: (11) Danielle Esser, Joe Grillo, Susan Weber, Bruce Harris, Nick Angarone, Keith Henderson, Melanie Willoughby, Stephen Santola, Julia Somers, Jeffrey Oakman, and Thomas Wright Nays: (0). Abstains: (0) Changing the September State Planning Commission Meeting date to September 10, 2025 was approved. Elizabeth Terenik had left the meeting and did not vote.

With no additional comment from the Commission, Chairman Wright asked AED Lane to provide the State Plan Update.

STATE PLAN UPDATE

Cross Acceptance Update

AED Lane reported that OPA awarded a second contract to Heyer, Gruel & Associates to assist with the development of the revised Plan. They will also assist with editing and reformatting both the revised and final draft of the final Plan. OPA will be sending the draft Infrastructure Needs Assessment (INA) and the revised draft of the SDRP in the coming weeks.

As previously mentioned, the PDC will most likely be held both on September 3, 2025 and September 10, 2025 to discuss the revised draft Plan. Lastly, AED Lane reported that OPA is working to finalize the new public hearing meeting dates, as the previous schedule was pushed back due to the delayed release of the IA.

Chairman Wright asked the Commissioners if they had any further questions or comments regarding anything previously discussed. As no member commented, he opened the floor to the public.

PUBLIC COMMENTS

No member of the public wished to comment.

ADJOURNMENT

With no further comments from the Commission or the public, Chairman Wright asked for a motion to adjourn. The motion was made by Julia Somers and seconded by Stephen Santola. All were in favor. The meeting was adjourned at 12:23 p.m.

ATTACHMENT A

NEW JERSEY STATE PLANNING COMMISSION ATTENDEES

DATE: AUGUST 6, 2025 TIME: 10:34 AM

Albert Dib

Alex Dougherty, Town of Dover

Anthony Soriano, Morris County

Barbara Woolley-Dillon, DEP

Bill Millette, Hunterdon County

Charles Shadle

C. Helms

Cheryl Chrusz

Chris Vaz, Seaside Heights

David Schley

Dillon McNamara

Donna Rendeiro

Erika Phillips, Somerset County

Fullerton Armours

Grant Lucking

John Hasse, Rowan University

H. Dumont

Jacob Thompson

James Humphries, NJ Highlands

Jason Kasler, NJPO

Jennifer Gorini, Seaside Heights

John Crane

Kamal Saleh, Union County

Kevin Keenan, Rowan University

Lauren Purdom, Cape May County

Leigh Ann Von Hagen, Rutgers

Marlene Smith

Matt Baumgardner

Meenar, Md Mahbubur Rabb, Rutgers

Michael Davis, HGA

Mirah Becker, Middlesex County

Peter Kortright, Bergen County

Qian He, Rowan

Ron Simone, Cape May County

Ruth Foster, NJDEP

Samantha De Andrea, Somerset County

Samuel Rosenthal, Rutgers

Sara Sundell, NJSEA

Tim Evans, NJ Future

William Hanson



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THOMAS K. WRIGHT

CHAIRMAN

Walter C. Lane
ACTING Executive Director/ACTING Secretary

Date: September 10, 2025

Patron: Thomas Wright

Resolution No. 2025-10 Page 1 of 2

RESOLUTION

APPROVAL OF THE FINAL STATEMENT OF AGREEMENTS AND DISAGREEMENTS (SAD)

WHEREAS, the State Planning Commission (hereafter the "Commission"), pursuant to N.J.S.A. 52:18A-202 of the State Planning Act (N.J.S.A. 52:18A-196 to -207), is required to prepare and adopt a State Development and Redevelopment Plan (hereafter the "State Plan"); and

WHEREAS, pursuant to N.J.S.A. 52:18A-199, the Commission is required to revise and readopt the State Plan regularly, with the latest version of the State Plan having been adopted in 2001; and

WHEREAS, the Commission, in revising the State Plan, is required, also pursuant to N.J.S.A. 52:18A-199, to initiate the Cross-Acceptance Process with the State's counties and municipalities; and

WHEREAS, in order to carry out this statutory responsibility, the Commission has, pursuant to its rulemaking authority under N.J.S.A. 52:18A-203, promulgated regulations which are set forth at N.J.A.C. 15:30-3.1 to -4.7 and which govern the manner in which the Cross-Acceptance Process shall be conducted; and

WHEREAS, pursuant to N.J.A.C. 15:30-1.4, the term "Cross-Acceptance" means a process of comparison of planning policies among governmental levels with the purpose of attaining compatibility between local, county, and State plans; and

WHEREAS, the Commission and staff of the Office for Planning Advocacy (OPA) have, together with the negotiating entities, as defined in N.J.A.C. 15:30-1.4, undertaken the first two phases of the Cross-Acceptance process known as the Comparison and Negotiation phases; and

WHEREAS, pursuant to N.J.A.C. 15:30-4.5(b), periodic reports of agreements reached during negotiation sessions and any remaining disagreements are to be published by OPA and be made available to the general public at the OPA and on the OPA website, county offices, and State depository libraries, as well as distributed to the Commission and interested persons and organizations who have registered with OPA pursuant to N.J.A.C. 15:30-1.6(b); and

Page 2 of 2

WHEREAS, the Commission, with the assistance of the Plan Development Committee (PDC) and OPA, prepared a draft Statement of Agreements and Disagreements (SAD), pursuant to N.J.A.C. 15:30-4.6, reflecting the areas of agreements and disagreements identified by the parties to the Cross-Acceptance process during the comparison and negotiation phases of the process; and

Date: September 10, 2025

Patron: Thomas Wright

WHEREAS, the draft SAD includes a statement on every issue and map amendment negotiated with the negotiating entities; and

WHEREAS, the Commission approved the release of the draft SAD on August 6, 2025 through Resolution 2025-09; and

WHEREAS, pursuant to N.J.A.C 15:30-4.6, the Commission is prohibited from acting on the draft SAD until at least fourteen days after its distribution; and

WHEREAS, the Commission has not acted on draft SAD for at least fourteen days following its distribution and wishes to approve the Statement of Agreements and Disagreements; and

WHEREAS, the Commission has determined that the best way to distribute the Final SAD is by electronic means.

NOW, THEREFORE BE IT RESOLVED, the Commission hereby approves the release of the Final SAD as the statement reflecting the areas of agreement and disagreement, which have been identified by the parties to the Cross-Acceptance process; and

BE IT FURTHER RESOLVED, that the Commission directs OPA, in accordance with N.J.A.C. 15:30-4.6(a), to electronically disseminate the draft SAD to: each municipality, each county, and all interested persons, as well as to the Meadowlands Commission, Highlands Council, Pinelands Commission, North Jersey Transportation Planning Authority, Delaware River Port Authority, Delaware Valley Regional Planning Commission, South Jersey Transportation Planning Organization, and each State depository library; and

BE IT FURTHER RESOLVED, that the Commission directs OPA to post the Final SAD to OPA's website; and

BE IT FURTHER RESOLVED, that the Executive Director and staff of OPA are hereby authorized and directed to take such other actions as may be necessary or appropriate for the implementation of this resolution.

I hereby certify that this resolution was duly adopted by the State Planning Commission at its meeting on September 10, 2025

Walter C. Lane, Acting Secretary State Planning Commission Date: September 10, 2025



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THOMAS K. WRIGHT

CHAIRMAN

Walter C. Lane
ACTING Executive Director/ACTING Secretary

Date: September 10, 2025

Patron: Thomas Wright

Resolution No. 2025-011 Page 1 of 3

RESOLUTION

APPROVAL TO RELEASE THE DRAFT FINAL STATE DEVELOPMENT AND REDEVELOPMENT PLAN AND THE DRAFT INFRASTRUCTURE NEEDS ASSESSMENT

WHEREAS, the State Planning Commission (hereafter the "Commission"), pursuant to N.J.S.A. 52:18A-199 of the State Planning Act (N.J.A. 52:18A-196 to -207), is required to revise and readopt the State Development and Redevelopment Plan (hereafter the "State Plan"); and

WHEREAS, also pursuant to N.J.S.A. 52:18A-199, the Commission is required to revise and readopt the State Plan regularly, with the latest version of the State Plan having been adopted in 2001; and

WHEREAS, in order to carry out this statutory responsibility, the Commission has, pursuant to its rulemaking authority under N.J.S.A. 52:18A-203, promulgated regulations which are set forth at N.J.A.C. 15:30 (State Planning Rules) and which, in part, govern the manner in which the Cross-Acceptance Process shall be conducted; and

WHEREAS, the Office of Planning Advocacy (OPA) published two Interim Reports during the Negotiation Phase of the Cross-Acceptance Process providing updates on the status and results of the meetings with the twenty-one counties and the New Jersey Highlands Council; and

WHEREAS, the Commission has completed the Cross-Acceptance Process, pursuant to N.J.A.C 15:30-4.6, with the approval of the Statement of Agreements and Disagreements; and

WHEREAS, as provided in N.J.S.A. 52:18A-202.1 and N.J.A.C. 15:30-4.7(a), the Commission is required to produce an Impact Assessment of the State Plan which describes the impacts of the policies and strategies proposed in the State Plan ("plan impacts") relative to the impacts that would likely occur without a State Plan ("trend impacts"), and shall identify desirable changes to be incorporated into the Final State Plan; and

WHEREAS, at the direction of the Commission, OPA has contracted with Rowan University and Rutgers University to prepare the Impact Assessment; and

Resolution No. 2025-011 Date: September 10, 2025
Page 2 of 3 Patron: Thomas Wright

WHEREAS, the Commission approved the Impact Assessment and disseminated it as required by N.J.A.C. 15:30-4.7(b); and

WHEREAS, pursuant to N.J.A.C. 15:30-4.6(c), the Commission's Negotiating Committee is required to prepare and submit to the Commission for its consideration and approval, a draft Final State Development and Redevelopment Plan reflecting recommended changes to the Preliminary State Development and Redevelopment Plan resulting from Cross-Acceptance.

WHEREAS, as provided in N.J.S.A 52:18A-201(b)(6), the Office of Planning Advocacy is required to prepare and submit to the Commission the Infrastructure Needs Assessment as an aid in the preparation of the State Plan, alternate growth and development strategies which are likely to produce favorable economic, environmental and social results; and

WHEREAS, at the direction of the Commission, the Office for Planning Advocacy (OPA) has contracted with Rutgers University to prepare the draft Infrastructure Needs Assessment; and

WHEREAS, pursuant to N.J.A.C 15:30-5.1, upon consideration of the Interim Reports from the negotiating entities and the Negotiating Committee, Statement of Agreements and Disagreements, and the Impact Assessment, the Commission is required to prepare and approve for distribution a draft Final State Development and Redevelopment Plan, which will also include the draft Infrastructure Needs Assessment; and

WHEREAS, the Commission hereby acknowledges and accepts the draft Final State Development and Redevelopment Plan, prepared by the Commission's Negotiating Committee, and the draft Infrastructure Needs Assessment, prepared by Rutgers University; and

WHEREAS, the Commission wishes to formally approve the draft Final State Development and Redevelopment Plan and the draft Infrastructure Needs Assessment; and

WHEREAS, the Commission has determined that said dissemination of the draft Final State Development and Redevelopment Plan, which includes the draft Infrastructure Needs Assessment to each negotiating entity, county and municipal planning board, mayor, board of county commissioners, county executive or county administrator, county and municipal clerk, and to those interested persons and organizations who have registered with OPA pursuant to N.J.A.C 15:30-1.6(b), as required by N.J.A.C. 15:30-5.1, and to the public shall be by email, and shall be posted on the OPA website.

NOW, THEREFORE BE IT RESOLVED, that the State Planning Commission hereby approves the draft Final State Development and Redevelopment Plan, prepared by the Commission's Negotiating Committee, and the draft Infrastructure Needs Assessment, prepared by Rutgers University; and

BE IT FURTHER RESOLVED, that the Commission directs OPA to disseminate the draft Final State Development and Redevelopment Plan, which includes the draft Infrastructure Needs Assessment electronically to each negotiating entity, county and municipal planning board, mayor, board of county commissioners, county executive or county administrator, county and municipal clerk, and to those interested persons and organizations who have registered with OPA pursuant to N.J.A.C. 15:30-5.1; and

Resolution No. 2025-09 Date: September 10, 2025

BE IT FURTHER RESOLVED, that the Executive Director and staff of OPA are hereby authorized and directed to take such other actions as may be necessary or appropriate for the implementation of this resolution.

I hereby certify that this resolution was duly adopted by the State Planning Commission at its meeting on September 10, 2025

Walter C. Lane, Acting Secretary State Planning Commission Date: September 10, 2025



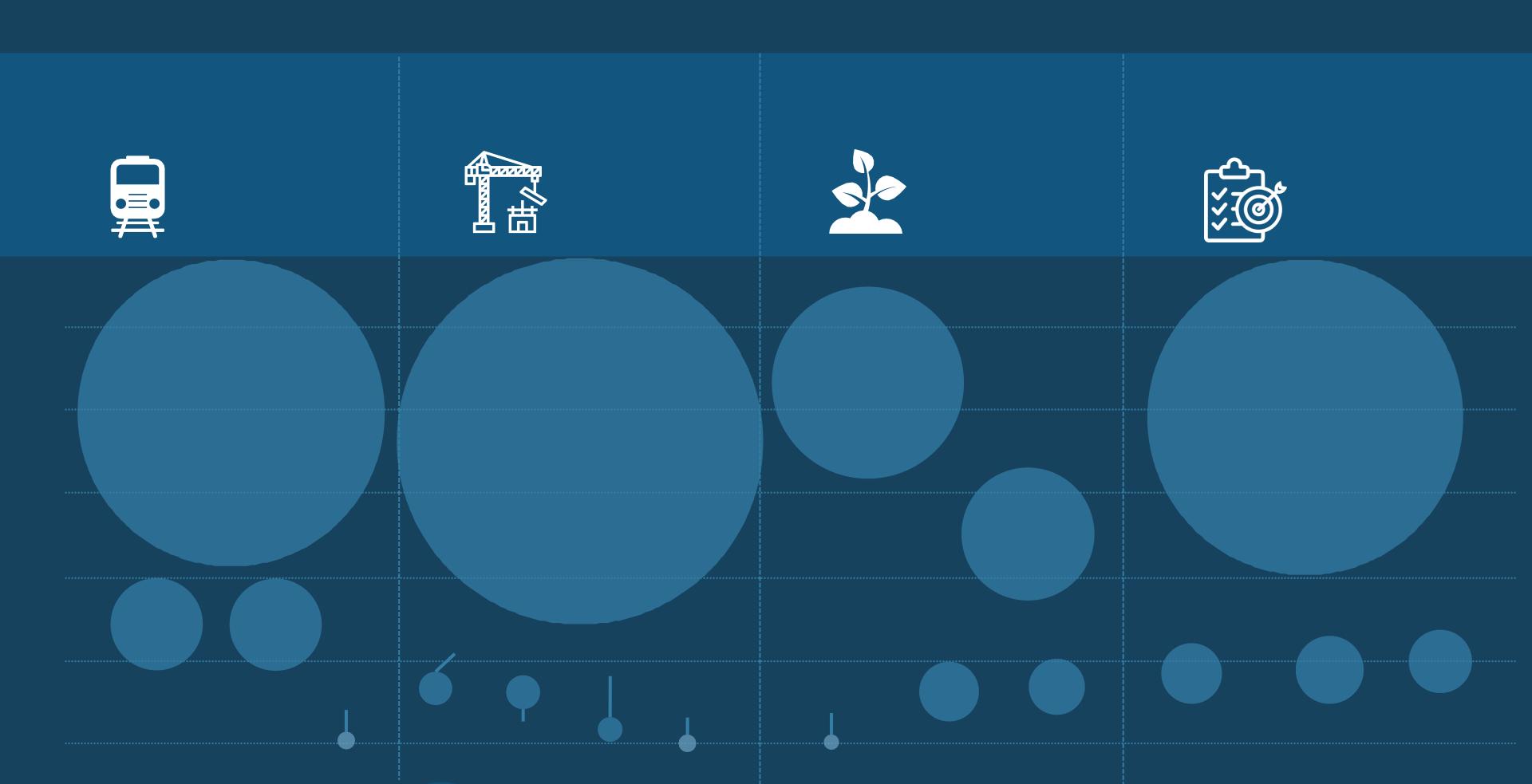
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09/10/25 Draft T	able Prelimin	ary State Development and	Redevelopment Plan Comments
Commenter Email		Subject	Comment
ksaleh@ucnj.org	8/26/2025	FW: Elizabeth's Updated CART	Hi Walter, As we previously discussed, the City of Elizabeth wanted to submit an updated CART as they feel the CART
			prepared by OPA's Intern was not sufficient. Please have your staff review the enclosed CART and if you have any questions please reach out to Ms. Maria Carvalho (mcarvalho@elizabethnj.org), the new Director of Planning and Community Development, as they noted her as the new main Cross Acceptance contact for the City of Elizabeth. I've informed the City that I would forward the updated City CART to your office.
			Contact me if you have any questions.
			Thank you,
			Kamal
kokc@WayneTownship.co m	8/13/2025	[EXTERNAL] Water Supply Infrastructure as part of State Plan Impact Assessment	Greeting OPA,
<u></u>		part or state i air impact i assistinctic	I took a brief look at the State Plan Impact Assessment, and I didn't see much discussion of providing water to serve the new development proposed throughout the state. If I am missing that part of the discussion, can you please direct me to the correct part of the report?
			I'm concerned because Wayne gets its water from North Jersey Water Supply District, and my understanding is that they only have 5 million gallons per day remaining to allocate. The Township recently got an additional 250,000gpd allocation, however, this allocation is not likely to las very long given the amount of housing development proposed in the Township. In discussions with our Water & Sewer division, it sounds like the development anticipated under Rounds 3 and 4 of our Mt. Laurel/Fair Housing Act plans would require a substantial portion of the remaining water from North Jersey (let alone any water demand for subsequent rounds). This of course ignores the demands being put on North Jersey from other municipalities experiencing similar growth.
			Is there any plan for how to address water demand throughout the state given the projected growth? I know we're trying to grow to keep housing costs down and to make the economy more attractive. That said, if we're running up on physical/natural barriers to new growth, we need to plan for this.
			Thanks,
			Chris
			Chris Kok, PP, AICP Township Planner Department of Planning Township of Wayne
bill_wolfe@comcast.net	8/8/2025	[EXTERNAL] Fwd: Distribution of the State	Hello State Planners: My named is Bill Wolfe, and I trained as a regional planner at Cornell's Graduate School,
		Plan Impact Assessment	Department of City and Regional Planning, way back in 1983-85, and worked in NJ since then professionally, so received the "Impact Assessment" with great interest. Along the way, I have lost interest in and not focused on the State Plan for some time now and am not current, so please bear with me.
			In immediately going to and reading the Climate chapter (p.63 ff), unfortunately I found no impact assessment. What I did find were substantively empty aspirational statements.
			Does the State Planning Commission accept that the NJ Global Warming Response Act - which sets numeric greenhouse gas emission reduction State goals and timetables - applies to the State Plan? If so, why was there no mention of that? If not, why not?
			In the wake of Governor Florio's Executive Order No. 114 (1994) there used to be a vibrant public policy debate about how best to incorporate the voluntary State Plan in DEP planning and regulatory programs. As you may know, THAT ORDER DIRECTED:
			"All State Departments and agencies shall:
			a. Adopt and incorporate as part of their agency programmatic mission, policies which comport with the State Plan and act in a coordinated fashion in investing resources at the State and local level in implementing the State Plan and achieving their programmatic missions." https://nj.gov/infobank/circular/eof114.htm
			Is that discussion still active?
			Is a related policy discussion about how to incorporate DEP planning and regulatory programs in the State Plan part of the current conversation?
johnp7376@gmail.com	7/30/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, As a concerned New Jersey resident, I urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. Our Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, John Pellegrino
			Flemington, NJ

	- / /	[
kdolsky@optonline.net	7/30/2025	[EXTERNAL] Comments on NJ State Plan	I only looked at the following sections: Clean energy, Decarbonization, Hazard Mitigation, Habitat Preservation and Restoration, and NJ Highlands.
			Who is going to use this plan? It is so high level as to be useless in planning anything. For example, it suggests we follow the Energy Master Plan as a vehicle to coordinate the energy planning activities. Ignoring the fact that the EMP is another useless document with no real plans, who is going to read this plan to see that they should be looking at another plan?
			What is the position of this plan among the many other planning activities and documents produced by the State that also mean very little? Is this the king of useless State documents? It seems to me that this is simply a keep-busy activity or a way to make people think they are being rewarded for their efforts by giving them an opportunity to spend time on a useless activity that appears to be useful.
			If the above is true, why bother commenting on this? I have been beating the crap out of BPU for their worthless EMP and beating the crap out of DEP for their worthless NJPACT plans and it has gotten me nowhere. So why bother with this document that has far less specificity than those other plans?
			The sections on forestry are of course distressing as they talk about reducing fuel load by burning as a means of reducing wildfire risk. The State Plan should follow the science that shows that thinning forests does not stop wildfires, it only makes them burn more intensely because the open areas allow the ground to dry out and makes the wood on the forest floor dryer. Thinning should only be used to protect nearby buildings and even then it should be the underbrush that is removed to prevent fire from reaching the tree tops. It should not involve cutting whole trees that are more than 200 feet from buildings.
			Moreover, the State has been logging 10 acre sections of Sparta Mountain for about 15 years for the purpose of creating more bird habitat. This has been a total failure and has absolutely no benefits except to hunters who like open areas for deer hunting. It harms many interior bird species and increases the expansion of invasive plant
dgalante@littlesilvernj.gov	7/16/2025 13:50	General Comments	I was very surprised no where in the document was the mention of terrorism as to infrastructure. Considering the pain NJ went through and the disruption to every day life we had in 2001 this is a real risk which should be considered. Specifically as it pertains to public parking at Transit stations being built under 5 story apartment buildings. This is a real risk.
chiaialaw@gmail.com	7/15/2025 15:24	General Comments regarding the Preliminary State Development and Redevelopment Plan	Policy of adding off-street parking options in downtown areas to enhance the economy in those areas. 2-Policy of Fair-share housing to be walking distance from public transportation. 3-Policy to preserve the "Garden State" character including golf courses, recreation, and athletic uses as a goal to maintain.
mayor@gibbsborotownhall .com	7/14/2025	FW: Gibbsboro Issues with State Plan	Hi llene. I was unable to join today's meeting but the Borough Clerk briefed me on meeting. We have two issues with the state plan:
			Gibbsboro has consistently challenged the state's failure to recognize the Natural Heritage Priority Site (NHPS) on the Lindenwold border as a PA-5 Planning Area. Around 2013 the state removed the area from sewer service but still counts the uplands in the land capacity factor for affordable housing. I am attaching charts that show the NHPS area and possible additions of the Tri-Boro gravel pit and adjacent open space in Gibbsboro and Lindenwold that would aggregate to an acre. Tri-Boro is engaged in dredging the Voorhees, Berlin Twp, and Lindenwold parcels which will become a large lake.
			The second issue is sewer service along South United States Avenue. As you are aware Gibbsboro is installing a pump station that will potentially service the area that was removed from service in the early 2010s over the objection of Gibbsboro. I am attaching the state sewer service chart that is in the state plan and we'd like it revised to add the parcels in the attachment back into service.
			Thanks for your support.
			Ed Campbell Mayor - Gibbsboro Borough
Steven.Bruder@ag.nj.gov	6/19/2025	FW: NJDA and SADC Comments on the Preliminary State Plan	Good afternoon Mr. Lane,
			On behalf of the N.J. Department of Agriculture and the State Agriculture Development Committee please find the attached document outlining comments on the Preliminary State Development and Redevelopment Plan. Also attached is a copy of the draft plan with the comments included within.
			Thank you for the opportunity to provide input, we look forward to working with the Office of Planning Advocacy to complete this important endeavor.
			Please let us know if you have any questions or concerns.
			Steven M. Bruder PP, AICP State Agriculture Development Committee (SADC)
			Physical Address: 200 Riverview Plaza 3rd floor, Trenton, NJ 08611 Mailing Address: PO Box 330, Trenton, NJ 08625 SADC Main Number (609) 984-2504 Cell: 732-779-9591
lazarv@aol.com	6/18/2025		To whom it may concern:
		Redevelopment Plan	Attached please find my comments on the draft State Development & Redevelopment Plan.
			Thank you, Vera Lazar
			Clifton, NJ

ospmail@sos.nj.gov	6/16/2025	FW: Preliminary Draft SDRP	Interesting way of looking at this, Vince. It raised another question for me, which was where the projections for population and employment were significantly different. I used your information to create a new column (see attached) to compare them. The county results highlighted in green are projected to have a significantly higher percentage employment growth than population growth, while those in red are the reverse. Those differences have interesting property tax and commuting implications. Tinx, Dan Daniel J. Van Abs, PhD, FAICP/PP, Professor of Professional Practice in Water, Society and Environment (Retired) Department of Human Ecology, School of Environmental and Biological Sciences Rutgers-The State University of New Jersey From: Vincent Domidion vindom21cn@yahoo.com Sent: Friday, June 13, 2025 2:19 PM These two Tables are a reorganization of the Population and Employment projection Tables in the Draft Plan. The seven counties that are projected to absorb the vast majority of the population and employment growth will present significantly different needs and opportunities than the fourteen that are stabilizing. The growth areas will need to assess carrying capacity expansion and replacement while the stabilizing areas will need support for upgrading existing aging infrastructure. In the growth areas there will be opportunities for new innovative zoning options for things like secondary housing units, multi-family and mixed use structures. In stabilizing areas need and opportunities for innovation will be limited. Zoning will need to manage redevelopment on a site by site basis. The greatest challenge immediately before us is to harmonize affordable housing allocations with these projections. The seven growth counties account for 80.9% of projected population growth and 84.9% the employment increase. They would necessarily generate the greatest demand for new housing as well, particularly quality workforce and senior housing options.
acoscia@wyckoffnj.gov	6/11/2025	[EXTERNAL] Notice to Surrounding Clerks	Good afternoon,
		for Housing Element and Fair Share Plan 2025	Attached please find the notice to the surrounding clerk for Housing Element and Fair Share Plan 2025. Have a great day. Anna Coscia, CMR Registrar of Vital Statistics Board of Health Secretary Shade Tree Commission Secretary Township of Wyckoff, New Jersey Office: (201) 891-7000 x 1000 Email: acoscia@wyckoffnj.gov 340 Franklin Avenue Wyckoff, New Jersey 07481 www.wyckoffnj.gov
nonationalpark2030@gmail .com	6/7/2025		The Delaware Water Gap National Recreation Area (DWGNRA) is noted as an area of "Critical Concern" in the Preliminary Draft of the State Master Plan. A proposal from the Delaware River National Park and Lenape Preserve Alliance would change the designation of the approximate 72,000 acres in DWGNRA to a national park and preserve. This re-designation will leave approximately 56,000 acres in the proposed New Jersey and Pennsylvania "preserve" area open to "Forest to Field Conversion." Possible activities in the preserve include timbering, resource extraction, habitat disruption and destruction. Resource extraction activities may also disrupt and destroy identified Ceremonial Stone Landscapes of the Lenni Lenape as well as other historical and cultural artifacts. Agricultural leasing will end, leaving approximately 2,000 acres subject to invasive species and disruption of habitat. Hunting will be prohibited in the National Park. Changing the designation of the DWGNRA to a National Park and Lenape Preserve would further restrict the ability of managers to affect habitat changes to benefit endangered species and species of greatest conservation need. As an example, three State of New Jersey endangered avian species are present on DWGNRA. They are goldenwinged warblers, bald eagles and red shouldered hawks. Though these are the only birds listed as endangered by the state, two state listed threatened species are found on DWGNRA, barred owls and kestrels. One recommendation of the Sussex County Planning Department suggests forming a partnership similar to the Upper Delaware Council on the Upper Scenic Delaware for management purposes. The Upper Delaware Council includes representatives from the National Park Service, two states and all local governments. A coalition of local representatives from the National Park Service, two states and all local governments. A coalition of local representatives from the National Park Service, two states and all local governments. A coalition of proposal. Several municipalities in S
Jeanette Bergeron	5/28/2025 22:40	• . • .	Please consider:
		and Priorities	a plan that conserves all undeveloped space until the already developed, vacant or underutilized spaces are occupied; a plan that requires planting the equivalent native plant volume for the volume of plant life that is destroyed in development within x miles of the site; a plan to not allow future billboards on state roads/highways because in this time of distracted drivers, we don't need any more distractions. Billboards are a visual distraction and pollute the night sky for birds that need the darkness to navigate.

cwilson@sourland.org			West Amwell Township (in Hunterdon County) has approved a resolution in support of the designation of the Sourlands as an Area of Critical State Concern (ACSC) in the new State Plan. The resolution is attached. This means that all seven municipalities in the Sourlands have officially endorsed the designation. We greatly appreciate your consideration of this matter. Cliff Wilson President of the Board of Trustees, Sourland Conservancy Dear Staff at the OPA, Attached are comments from New Jersey Future on the Draft State Plan regarding the Sourlands. Thank you, Chris Sturm
Lisa.Avichal@sos.nj.gov	5/20/2025		From: Lane, Walter [DOS] <walter.lane@sos.nj.gov> Sent: Tuesday, May 20, 2025 12:49 PM To: Avichal, Lisa [DOS] <lisa.avichal@sos.nj.gov>; Simone, Steven [DOS] <steven.simone@sos.nj.gov>; Zamora, Felix [DOS] <felix.zamora@sos.nj.gov>; Barnes, Naomi [DOS] <naomi.barnes@sos.nj.gov> Subject: FW: State Plan comments</naomi.barnes@sos.nj.gov></felix.zamora@sos.nj.gov></steven.simone@sos.nj.gov></lisa.avichal@sos.nj.gov></walter.lane@sos.nj.gov>
			FYI Walter C. Lane, PP, AICP Acting Executive Director NJ Office of Planning Advocacy
			NJ Business Action Center NJ Department of State
Walter.Lane@sos.nj.gov	5/16/2025	RE: Question	Hi Walter: I just had a few quick questions. (1). I am not sure if you ever did this yet, but would it be possible to send us a copy of the Powerpoint you shared at each of the county public meetings? I would be specifically interested in the Cumberland County one, as I am a resident there, but I would assume they are all pretty similar. (2). When is the last day to submit comments on the SDRP? Please advise on these at your convenience.
dhellar Ociana	r las lacer		Thank you. [cid:image002.png@01DBC677.17D05A20] David Heller, PP/AICP Program Manager - Systems Performance and Subregional Programs South Jersey Transportation Planning Organization 817 E. Landis Avenue, 2nd Floor Vineland, New Jersey 08360 (856) 794-1941 www.sjtpo.org [https://urldefense.com/v3/_http://www.sjtpo.org/_;IIJ30X0ZrnC1oQtbAIN57rT2jhXs7- 21jpPgVSYIH4TAbZ8hiWkdfPBkuCa_txM4-Tu6WTK_uyHQe01EtejsrJRB3EI92uDUCYqf6L\$]
dheller@sjtpo.org	5/16/2025		Hi Walter: Alternatively, if none of these dates or times work for you, let me know and I can suggest some other days/times. Note I will be out of the office from Wednesday, 5/21/25-Wednesday, 5/28/25, returning on Thursday, 5/29/25. Thanks again. David Heller David Heller, PP/AICP Program Manager - Systems Performance and Subregional Programs South Jersey Transportation Planning Organization 817 E. Landis Avenue, 2nd Floor Vineland, New Jersey 08360 (856) 794-1941 www.sjtpo.org

dheller@sjtpo.org	5/16/2025	[EXTERNAL] RE: Question	
			Hi David,
			It would be easy if I gave you a call to explain/discuss. Please suggest a few dates and time that work for you.
			Best,
			Walter C. Lane, PP, AICP
			Acting Executive Director NJ Office of Planning Advocacy
			NJ Business Action Center
			NJ Department of State
			225 West State Street, 3rd Floor P.O. Box 820
			Trenton, NJ 08625-0820
			P: 609.875.3839
			Walter.Lane@sos.nj.gov NJBAC 2024 Annual Report
			TODAC 2024 Allitual Report
Resident	5/14/2025 10:17	2050 Statewide Planning Goals,	"This comment is related to the Housing Goal - I disagree with this sentence on the
		Strategies, and Priorities	bottom page 23 (also appears on pg. 11 of the Executive Summary) - "Land Preservation
			should be encouraged, but balanced so that we do not concentrate all preservation in
			certain regions, shifting the growth burden to already overburdened high-density
			residential areas."
			NI peode to focus on proconving all the land it can before it is last to development his set
			NJ needs to focus on preserving all the land it can before it is lost to development. Most of the land available for preservation is in certain regions. I also disagree with the
			language "growth burden" and "overburdened high-density residential areas." Growth
			does not need to be a burden, and people are most definitely not a burden. Also, high-
			density residential areas are not always overburdened. Most high-density residential
			areas in NJ could increase density with Missing Middle Housing and ADU's or building 6+
			stories instead of capping at 5 stories. There are lots of opportunities for growth.
			" On
			page 36 under Identify new centers the Plan says, "New Centers should be identified to
			relieve areas that are overburdened." Overburdened with what? What does
			overburdened mean here? What relief is needed? Is it referring to Overburdened
			Communities?
1sandyhull@gmail.com	5/14/2025	[EXTERNAL] Delaware Water Gap National Recreation Area	Hello on page 62 of 167, the Delaware Water Gap National Recreation Area is noted as an area of "critical concern" that should be considered in the future. Please explain or elaborate what "critical concern" means and
		ned edition, wed	why.
			Thanks
			Sandy Hull 973.903.0470
			1sandyhull@gmail.com
:-:	F /12 /2025	[CVTCDNA1] Inner City Indian Hill Main	Day Commissioners of the NI Chata Disease Commission
joi@equalislaw.com	5/13/2025	[EXTERNAL] Jersey City Jackson Hill Main Street S.I.D. Proposal to Aid NJ Planning	Dear Commissioners of the NJ State Planning Commission,
		Commission Dev. Plan	Thank You for the opportunity to comment on the Preliminary Draft of the New Jersey State Development Plan. I
			represent the Board of Directors for the Jersey City Jackson Hill Main Street S.I.D. who have read the plan and who submit this award winning collaboration with the Gensler Research Institute, and the J.C. Department of
			Sustainability as support for your vision.
			The report is a comprehensive overview and study of the Jackson Hill Special Improvement District which is a program enacted by the Mayor of Jersey City's office to work in partnership to improve the quality of life for
			residents in several designated districts around the city.
			Within this report, which is the culmination of several years work are results that postain to the accident
			Within this report- which is the culmination of several years work, are results that pertain to the ecological, environmental, economic, and social themes which resound with the NJ State Development and Redevelopment
			mission to improve public health and the environment, ensure stable communities, secure clean and healthy air,
			and sustain economic growth.
			The Action Plan included within the report not only provides the background of the neighborhood, but also
			encompasses residential input, surveys, logistics, and outcomes which can alleviate the efforts needed to collect
			data and it's subsequent analysis with comprehensive and clear information. This saves the Commission time, and money, as well as provides succinct directions pertinent to the needs of the Jackson Hill Main Street S.I.D. and the
			residents within.
			The ask specifically, is to include the City of Jersey City's Jackson Hill Main Street Special Improvement District in your funding opportunities, as well as consider the S.I.D. within your budgetary allocations that are dedicated to
			the improvement of urban neighborhoods which are in great need of financial support to implement a solid plan
			towards economic and environmental equity.

dheller@sjtpo.org	5/12/2025	[EXTERNAL] Question	Hello:
			One of the main questions I had—and I apologize if this is coming too late in the process-but what are the incentives for municipalities and counties to follow the State Plan? Is there any real "teeth" behind the State Plan?
			Thank you.
			Kind Regards,
			David Heller, PP/AICP
			Program Manager - Systems Performance and Subregional Programs
			South Jersey Transportation Planning Organization
			817 E. Landis Avenue, 2nd Floor Vineland, New Jersey 08360
			(856) 794-1941 www.sjtpo.org
			(100) 100 100 100 100 100 100 100 100 100
Lisa.Avichal@sos.nj.gov	5/9/2025	FW: Request for Additional Inter-Agency	From: Lane, Walter [DOS]
		Work Group Comments on Draft SDRP	Sent: Friday, May 9, 2025 12:48 PM
			To: Avichal, Lisa [DOS] ; Simone, Steven [DOS]
			Subject: FW: Request for Additional Inter-Agency Work Group Comments on Draft SDRP
			Good afternoon,
			Please see DOH's comments below. All these revisions seem reasonable to me. Thoughts?
			In particular, please let me know if you think the proposed new priority "Design equity based affordable housing that fits local character" should be expanded to
alex.zakrewsky@gmail.com	5/8/2025 15:17	General Comments	"START OF PART 2 OF 2
			III. Enhancing School Choice New Jersey's school enrollment system reinforces residential sorting, with access based on municipal borders. This
			drives household relocation based on school district reputations rather than proximity to jobs, transit, or services.
			In 2023, over 29,000 students were on charter school waitlists, while only 63,000 were enrolled across 86 charter
			schools statewide. The Interdistrict Public School Choice Program serves only about 5,000 students, despite far
			greater demand. Recommendations:
			IllExpand school choice through portable state education funding.
			IllScale up the Interdistrict Choice Program to reduce enrollment-related displacement.
			IllSupport high-performing charter schools in all districts.
			Decoupling education access from municipal geography will improve housing flexibility, reduce travel burdens, and support the development of centralized, mixed-income communities.
			IV. Balancing Open Space and Farmland Preservation
			Preservation remains essential—but its implementation must avoid pushing growth into fringe areas. New Jersey
			has preserved over 1.67 million acres of open space and farmland, equivalent to 34% of its land base; the Garden
			State Preservation Trust acquired over 460,000 acres from 2000–2020 alone. Without counterbalancing balancing
			housing supply, these efforts raise housing prices and strain infrastructure. Recommendation:
			IllEnact a density-offset policy: for every housing unit precluded through State-funded conservation, municipalities
			must zone for an equivalent (or greater) number of units.
			Such a policy ensures that preservation complements—not conflicts with—housing affordability and infrastructure efficiency.
			V. Reforming the Farmland Assessment Program
			While originally designed to support working farms, the Farmland Assessment Program now too often serves

alex.zakrewsky@gmail.com	5/8/2025 15:15	Please provide your general comments	Comments and Recommendations on the Draft New Jersey State Development and Redevelopment Plan
		regarding the Preliminary State	By Alex Zakrewsky, New Brunswick
		Development and Redevelopment Plan in the Text Box below	Preface Low density sprawl stands in the way of many New Jersey State Development and Redevelopment Plan (Plan)
			goals. This condition is created and sustained by transportation subsidies, outdated land use regulations,
			unbalanced farmland and open space preservation programs, and municipally based public school systems. Re- densification would help meet many of the Plan's objectives, including environmental protection, equitable access
			to opportunity, and efficient infrastructure use.
			What follows are the top five key policy reforms to advance re-densification. Some may not be immediately
			politically feasible, and others challenge prevailing planning norms, but they are offered in the spirit of long-term stewardship and bold problem-solving. These comments are offered in a personal capacity.
			Introduction
			The revised Plan holds significant promise for realigning our state's development path. Its success, however, will
			depend on whether the structural incentives behind sprawl are confronted. The Plan's effort to reexamine dysfunctional land regulation is a good start. By dismantling these barriers, we can foster sustainable growth,
			improve social equity, and revitalize communities statewide.
			I. Reassessing Transportation Subsidies
			Transportation subsidies unintentionally promote sprawl. NJ Transit, for example, received over \$715 million in
			operating support in FY2023, moving its farebox recovery ratio to 53%. Meanwhile, over 40% of vehicle miles traveled in the state are single-occupancy, long-distance commutes encouraged because drivers do not pay for
			the full cost of road construction and maintenance.
			Recommendations:
			Reduce and eventually eliminate public subsidies for all transportation modes. Expand cost-reflective friction- free road tolling and increase transit fares to shift the burden of transportation infrastructure to commuters and
			other travelers, thereby disincentivizing low-density development living and building market demand for higher-
			density habitations.
candice.davenport@gmail. com	5/6/2025 17:28	Please provide your general comments regarding the Preliminary State	As the public health consultant to the American Planning Association, NJ Chapter on the Plan4HealthNJ project, it is noted that 'public health' is not mentioned once in the 10 goals but 'improving public health through planning' is
		Development and Redevelopment Plan in	the underpinning reason for all of these goals. Furthermore a community does not thrive if its residents are not
		the Text Box below	healthy. Please add and mention 'improving public health' as the main reason for doing all the great work you are
			doing. There should also be intent to see if changes are making an impact to health, over time. Working with public health and environmental health through the NJDOH and NJDEP's Health Community Planning website would be
			beneficial to demonstrate progress.
			As the
			public health consultant to the American Planning Association, NJ Chapter on the Plan4HealthNJ project, it is noted
			that 'public health' is not mentioned once in the 10 goals but 'improving public health through planning' is the
			underpinning reason for all of these goals. Furthermore a community does not thrive if its residents are not healthy. Please add and mention 'improving public health' as the main reason for doing all the great work you are
martinsantini29@gmail.co	5/3/2025	[EXTERNAL] Zoom Seminar	Great job Mr Lane , my question is ,are there any planned educational classes to be developed to educate
<u>m</u>			architects and other professionals about the merits of the state plan and how it impacts local planning boards.
			What about the possibility of educating high school students?
			-
			Martin Santini, FAIA
Darlene.Green@collierseng	5/2/2025	[EXTERNAL] RE: Draft State Plan	Good afternoon,
<u>.com</u>		Comments: Frelinghuysen Township (FRB001 5.2.25)	Please find attached the Township of Frelinghuysen's comments regarding the Draft State Plan. Thank you Darlene A. Green, PP, AICP
		(,	Senior Project Manager
			Hampton, New Jersey Colliers Engineering & Design
			darlene.green@collierseng.com
			Direct: 908 200 2801 Cell: 732 284 7684 Main: 877 627 3772
			colliersengineering.com affiliated authorized entities
robort hudok@iit	E /a /200E	[EVTERNAL]	To whom it may concern:
robert.hudak@insiteeng.ne <u>t</u>	5/1/2025	[EXTERNAL]	To whom temay concern.
			Please see the attached letter which contains comments prepared by my office on behalf of the Borough of
			Totowa regarding the draft New Jersey State Development and Redevelopment Plan.
			If you have any questions or concerns, please feel free to contact my office
			Robert Hudak, MPA, PP, AICP
			Professional Planner robert.hudak@insiteeng.net
			InSite Engineering, LLC
			P (732) 531-7100
			www.InSiteEng.net 1955 Route 34; Suite 1A Wall, NJ 07719

shristal@thowatershed.org	4/20/2025	[EVTERNAL] Deadline question	Places confirm the deadlines for written comments to the Undate to the State
sbristol@thewatershed.org	4/29/2025	[EXTERNAL] Deadline question	Please confirm the deadlines for written comments to the Update to the State Plan for the following:
			1. County response
			2. Community response
			3. Non-Gov organizations
			Thank you.
			Susan
			Susan P. Bristol, AICP, AIA Emeritus, LEED AP
			Municipal Policy Specialist The Watershed Institute
			31 Titus Mill Road, Pennington, New Jersey 08534 www.thewatershed.org
			[https://urldefense.com/v3/_http:/www.thewatershed.org/_;IIJ30X0ZrnC1oQtbAIJWeWRNyZ5mQ8ICbqYJ0YyT VgND8weYIFF-aEp5qe8Wifkqo0UovBuz5X8DhICqBbV49ucFZRi7H39QY6RVB2OkdJly7lsg\$]
	. /2.2 /2.2.2		609.737.3735 x52
ksyvruds@comcast.net	4/26/2025	[EXTERNAL] CILU Comments on Preliminary State Development and Redevelopment Plan	To Whom It May concern:
			l presented this statement at the March 31 meeting in Freehold New
			Jersey. I hope it is not too late to submit the paper copy. Somehow I
			thought I had done it, but discovered I had not. Attached is the
			statement from the Holmdel Citizens for Informed Land Use.
			Thank you for your attention to this matter
			Sincerely,
			Karen Strickland
			26 Heyward Hills Dr, Holmdel, NJ 07733
Darlene.Green@collierseng .com	4/25/2025	[EXTERNAL] Draft State Plan Comments: Hillsdale Borough (HDB001 4.24.25)	Good evening, Please find attached the Borough of Hillsdale's comments regarding the Draft State Plan. Thank you.Darlene A. Green, PP, AICP Senior Project ManagerHampton, New Jersey Colliers Engineering & Design
			darlene.green@collierseng.comDirect: 908 200 2801 Cell: 732 284 7684 Main: 877 627 3772colliersengineering.com affiliated authorized entitiesDISCLAIMER This e-mail is confidential. It may also be
			legally privileged. If you are not the addressee you may not copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system
			and notify the sender immediately by return e-mail. Internet communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability for any errors or omissions. Any drawings, sketches,
			images, or data are to be understood as copyright protected.
franticfms@gmail.com	4/25/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State	I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in
		Concern Dear Members of the State Planning Commission,	Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in
		•	crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's
			to ensure that the Sourland Region receives the designation and supports or urgently needed. Sincerely, Frances M
			StagerStockton,NJ Fran StagerOmnia del Gloria
Darlene.Green@collierseng .com	4/22/2025	[EXTERNAL] Draft State Plan Comments: Montvale Borough (MPP001 4.22.25)	Good afternoon, Please find attached the Borough of Montvale's comments regarding the Draft State Plan. Thank you. Darlene A. Green, PP, AICP Senior Project ManagerHampton, New Jersey Colliers Engineering & Design
			darlene.green@collierseng.comDirect: 908 200 2801 Cell: 732 284 7684 Main: 877 627 3772colliersengineering.com affiliated authorized entitiesDISCLAIMER This e-mail is confidential. It may also be
			legally privileged. If you are not the addressee you may not copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system
			and notify the sender immediately by return e-mail. Internet communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability for any errors or omissions. Any drawings, sketches,
			images, or data are to be understood as copyright protected.
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Administrator (1 ===:=All	4/24/2025	Conoral Comments	HEADLINE, THERE MILET BE A CTRONICED MANDATE FOR RECIONAL DIAMBING FUNDING & EVECUTION
Administrator@LeoniaNJ.g ov	4/21/2025	General Comments	HEADLINE: THERE MUST BE A STRONGER MANDATE FOR REGIONAL PLANNING, FUNDING & EXECUTION especially for storm-water management, infrastructure and connectivity.
			Given that the silos of agencies in NJ have mandates that are at odds with each other, one can appreciate how challenging developing the State Plan is. For example, Affordable Housing pushes for development while NJDEP pushes for green space, environmental protections and storm-water/flood protections.
			The Plan states that its goal is growth in population and economic development. At the same time, the Plan pushes for sound planning, traffic decongestion, environmental protection, clean water sources and stormwater/flood prevention. These antithetical items are reconciled by emphasizing:
			Accessory dwellings. If someone wants to add a room for Grandmother, let them go to the planning board rather than build dwellings that only encourage illegal, unsafe abodes. Reduction of single-family detached dwellings and focus on multi-dwelling units. Thus the American Dream of owning a home with a yard is destroyed. This plan is going to turn NJ into one giant city. Shared parking/driveways both commercial, municipal and residential. This is not feasible. Who would voluntarily share their driveway if it is not already shared? Converting 2nd homes to primary residences. Again, does NJ actually think that affluent residents with summer homes at the shore are going to convert them to primary residences and give this up themselves? Focused Densities, Centers & nodes. Essentially, it pushes towns to build UP in the city centers to preserve green-
			space. This forces vacant land towns to increase density immensely while buying out other homes to create green space. This will destroy our towns and where is this money coming from? • "Reducing the visual impact of automobiles" (electric or otherwise) and increase in walking & bike paths to/from the centers & nodes. "Move people and goods, not autos". Completing inter-nodal transportation linkages. I agree with this point but the State needs to push light rail and other connections. Municipalities cannot do this on their own.
cwilson@hbts.com	4/19/2025	[EXTERNAL] Additional Comment on Draft. State Plan	"Smart Growth Planning Management Project for the Sourland Mountain" is a critical document for your consideration in deciding whether to include the Sourlands as an Area of Critical State Concern. (I have linked to a PDF on the Sourland Conservancy website because the document is too large to include as an email attachment.) I can provide a physical copy of the book upon request. This comprehensive study of more than 350 pages was largely funded by a grant from the State of New Jersey Department of Community Affairs Smart Growth Grant Program. It was produced in late 2005 by Banish Associates, Demicco & Demicco & Demicoo & Demi
dbongiovanniww@gmail.co m	4/17/2025	[EXTERNAL] Please Recognize the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I hope this email finds you well. I am a concerned New Jersey resident, hiker, and environmentalist. I believe the Sourland Mountain Region should be dedicated as an Area of Critical State Concern. Please amend the updated State Plan to reflect this. Goals #6, #7, and #8 cannot be met if the largest contiguous forest in Central Jersey is ignored by the plan. Consider The Watershed Institute's estimate that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of their clean drinking water. Their access to clean drinking water is threatened by the decline of the region. Ecosystem threats include widespread tree loss, pressure from humandevelopment, and lack of natural regeneration due to overbrowsing by an out-of-control deer population. The updated State Plan should recognize the Sourland Region's cultural, historical, and environmental value. The climate crisis requires conservation and ecosystemrestoration. Do not let the Sourland Region become a casualty of the Anthropocene. Thank you for your consideration.Sincerely, Danielle Bongiovanni (Union, NJ)
lkoplik@comcast.net	4/16/2025	1	Dear Sir or Madam,
		Redevelopment Plan	I would like to add my name to those who think it is essential that the Sourland Mountains be designated as an Area of Critical State Concern in the final State Development and Redevelopment Plan. The Sourlands are important to the public as a forest that provides many benefits to people and wildlife, particularly birds. The Sourlands need to be included in the plan, since such a designation would provide support and funding for conservation efforts.
			Thank you for reconsidering whether to designate the Sourlands as an ACSC. This is an important matter for all of us now, plus future generations. Sincerely, Lawrence Koplik Belle Mead, NJ
Janson_Kara@aclink.org	4/11/2025	Please provide your general comments regarding the Preliminary State Development and Redevelopment Plan in the Text Box below	When creating plans that impact where people live, work, and play, public health should have a voice at the table. Our goal is to care for groups of people, we spend every day in our communities engaging with people and the infrastructures that keep them alive, healthy and productive. We have a valuable perspective to share to guide decision making because we fight each day to change conditions that negatively impact populations.

			,
njangle@gmail.com	4/10/2025 13:54	the Text Box below	The Sourland mountain region is one of the most ecologically vital and culturally rich landscape that is under threat from your decisions. By keeping this irreplaceable landscape out of the Area of Critical State concern, this mountain range that supports both bird, wildlife and native plantings will deteriorate without funding. The loss of over a million Ash trees alone need replenishment. Besides the tree loss, the designated Continental important bird area in Central Jersey will diminish its importance without more trees. How could this happen? I urge you to reconsider adding this to the state development and redevelopment plan. I urge you to put the Sourland mountain region on the state development redevelopment plan. Redevelopment of this area with new plantings to mitigate the loss of our emerald ash borer taking down ash trees is needed. Since this mountain range is One of only 113 designated Continental in bird areas, replacing trees and eliminating additional invasive species can only add to the tourists that would come and visit us.
Darlene.Green@collierseng .com	4/10/2025		Good morning, Please find attached the Township of Holland's comments regarding the Draft State Plan. Thank you. Darlene A. Green, PP, AICP Senior Project ManagerHampton, New Jersey Colliers Engineering & Design darlene.green@collierseng.comDirect: 908 200 2801 Cell: 732 284 7684 Main: 877 627 3772colliersengineering.com affiliated authorized entitiesDISCLAIMER This e-mail is confidential. It may also be legally privileged. If you are not the addressee you may not copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system and notify the sender immediately by return e-mail. Internet communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability for any errors or omissions. Any drawings, sketches, images, or data are to be understood as copyright protected.
laluce4@yahoo.com	4/9/2025	[EXTERNAL] Sourland Mountains ACSC	Please include the Sourlands as an Area of Critical State Concern. With so little undeveloped land left in NJ, it is critical that these preserved areas are protected, and cared for. In addition to the fact that the Sourland Mountain Region is comprised of contiguous forest which is crucial for our rapidly disappearing wildlife, it also serves humans by providing drinking water, sequestering carbon, and having many areas for hiking and recreation. We have to remember that we share this planet with a host of flora and fauna that nurtured earth before humans arrived. Had it not been for all of these beings, humans would not be able to live on this planet. It is urgent that The NJ State Development and Redevelopment Plan designate the Sourland Mountain Area as an ACSC.Kind regards,Barbara Fanelli Ringheim
zoomomma1@gmail.com	4/8/2025	of the State Plan	III, I was recently at a meeting in Newton on the State Plan. Sussex County always seems to get the short end of the stick so to speak. Here are my comments I made at the meeting.#1 In the farmland preservation formula to determine which farms have priority to preserve, Sussex County has always come up short on points concerning soil type. Yes many of our farmers have rocky soil. That soil can be very productive with/for certaintypes of crops. With fertilizer augmentation many different crops can be produced, as many Sussex County Farmers have done for generations. So please reconsider and restructure the soil type question on the application. Do not be a "species racist" thinking that only great natural soil can grow fabulous crops. Also please consider that the hay and corn products grown on Sussex County Rocky Soil support not only human consumption, but also the livestock consumption in the state. So please change the application in the soil type question.#2 Many of our Sussex County Farmers take theirproduce directly to large Metropolitan areas and have contracts with the towns to conduct a Farmer market in their town/city, (i.e. Hoboken, Jersey City, and the NYC floralmarket)Sussex County Farms (or any county's farms) should be given credit (via points in the formula) for thier participation and proximity to those large metropolitan areas. @3 The size of preserved farms should also not limit the application of farms for preservation. A smaller (15 acre?) nursery farm can produce trees, flowers, or livestock: goats, sheep etc that can be sent to market. So the size option of the proposed application for the farm to be preserved should be noted on the application with an asterisk that the County Development Board can consider that farm for preservation. #4. The words " Mext Generation Program" should be changed, or at least noted that that particular phrase does not necessarily designate only genetic family members. Perhaps " Future Farmer Support" 'Welcome Farmer Program"
dvalazza@comcast.net	4/5/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Debra Valazza Skillman, NJ
jeanpublic1@gmail.com	4/4/2025		"we need to go much slower on development/redevelopment in nj.our open space is being destroyed, our forests are being logged, i.e sparta mt, the developers have all thes way and input in trenton. the right toi live here in nj is being taken away by govt through terrible inflation and taxation. I think having planners who are older and have a history of what nj used to look like should be hired. I think these youngsters who dont have any history of the open land that used to be in nj and how much better such living conditionis are where people can live in peace. placing people on top of each other in fact brings about dissention and violence. saving open space needs highest priority imo"
dschilke1@comcast.net	4/4/2025		I have lived in Hillsborough my entire life and have spent many wonderful hours in the Sourllands hiking Spring, Summer, Winter and Fall. Please protect the Sourlands via the updated state development and redevelopment plan. They Sounds are also a climate resource to those of us who live here and in the surrounding communities. Please include the Sourlands in the plan! Diane Schilke Sales Associate RE/MAX Preferred Professionals Office 908-874-4426 x 20 Cell 908-334-1036 Check Zillow.com for referrals from past customers

julia@njhighlandscoalition. org	4/2/2025		Dear Members of the State Planning Commission, I write to provide comments on the draft State Development and Redevelopment Plan, dated December 4, 2024. Thank you for recognizing the Sourland Region as an area for potential future designation as an Area of Critical State Concern (ACSC). However, given the urgent challenges facing the Sourlands today—including the Emerald Ash Borer infestation, Beech Leaf Disease, overbrowsing by deer that hinders forest regeneration, invasive plant species, and increasing development pressures—we strongly urge the Commission to act now. The Sourland Region is a vital natural resource for our state. The Watershed Institute estimates that more than 800,000 residents of New Jersey and Pennsylvania rely on the Sourlands for some or all of their drinking water. Designating the Sourlands as an ACSC would formally acknowledge its critical role and potentially unlock additional funding opportunities for forest restoration, while enabling the implementation of more effective deer management policies and conservation initiatives. The Sourland Conservancy has been working closely with nonprofits, municipalities, businesses, and residents to address these environmental challenges. Together, we are restoring the region's ecosystem health to mitigate climate change impacts, reduce flooding, filter air and water, and preserve critical habitat for wildlife—including 57 state-listed threatened and endangered species that depend on the Sourlands for survival. To date, we have planted more than 50,000 trees in the region. Unfortunately, the New Jersey Forest Service estimates that we are losing more than one million trees to the Emerald Ash Borer alone—approximately 20% of the entire forest. Our petition is broadly supported by municipalities, counties, and nonprofit organizations throughout the region. Before the comment period closes, we anticipate securing resolutions or letters of support from most, if not all, of these
			stakeholders. We will submit a complete list as it becomes available. Attached, please find our detailed response to the draft State Plan. We deeply appreciate your consideration of this urgent matter. Please let me know if I can provide any further information.Best regards, Laurie Cleveland – Laurie ClevelandExecutive Director Sourland ConservancyPO Box 197183 Hollow RoadSkillman, NJ 08558609.309.5155www.sourland.org. – Julia SomersExecutive DirectorNew Jersey Highlands CoalitionOffice: (973) 588 7190Cell: (973) 525 2768www.njhighlandscoalition.orgYour water, your future.
rondack.jack@gmail.com	4/2/2025	[EXTERNAL] Designation for Sourlands	To Whom it May Concern:As President of the Montgomery Friends of Open Space, I am writing to strongly endorsethe proposed "critical" designation status for the Sourland Mountain Region. There are many groups that share this vision for the Sourland region including, but not limited to, Montgomery Township Committee, MontgomeryEnvironmental Commission, Montgomery Open Space Committee, The Watershed Institute, and the Sourland Conservancy.Countless hours of work have gone into the preservation and repair of this valuable resource. Flood remediation (Ida) and massive tree replantings (Emerald Borer-Ash Trees) have highlighted the continuing work of many organizations. The Rock Brook corridor has received special focus in an effort to mitigate floodingissues and to buffer the fragile ecosystems surrounding the region. As an indication of the specialness of the region, The NJ Department of Environmental Conservation recently elevated Rock Brook to a "Catagory1" status.In summary, the state planning board'sappropriate designation for this area is greatly needed. Your attention to this request is appreciated. Sincerely yours, Jack Roberts President, Montgomery Friends of Open Space
senturner@njleg.org	4/2/2025		NEW JERSEY SENATE SHIRLEY K. TURNER SENATE PRESIDENT PRO TEMPORE SENATOR, 15 TH DISTRICT MOUNTAIN VIEW OFFICE PARK 850 BEAR TAVERN ROAD SUITE 101 EWING, NJ 08628 TEL. 1609) 323-7 239 FAX 16091323-7633 E-MAIL: senturner@njleg.org Walter Lane, Acting Executive Director New Jersey Office of Planning Advocacy Department of State P.O. Box 820 Tenton, NJ 08625 Dear Mr. Lane, VICE CHAIR EDUCATION COMMITTEE ECONOMIC GROWTH COMMITTEE MEMBER STATE GOVERNMENT, WAGERING, TOURISM & HISTORIC PRESERVATION COMMITTEE COMMISSIONER EDUCATION COMMISSION OF THE STATES March 24, 2025 I have heard from a number of constituents who are concerned that the Sourland
single ₁ 2@aol.com	4/1/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. I also value it as a recreational area in a part of NJ that is very congested and getting overdeveloped. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Judy SingletonRocky Hill, NJ

turdomar@comcast.net	3/31/2025	[EXTERNAL] Sourland Mountain	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Maria Turdo Bucks County, PA
lunchboxlady@peoplepc.co m	3/30/2025		In reading the Cross Acceptance Manual, I do not find it relatable to the Salem County area. The references seem to apply to northern New Jersey. I am looking forward to working with this group to accomplish a more standardized state plan.
briceandjimhall@att.net	3/30/2025	[EXTERNAL] Sourland Mountains	Dear NJ State Planning Commission, I am a 16 year resident of Montgomery Twp and a 17 year resident of Raritan Twp before that. I am writing to tell you what a treasure the Sourland Mountains are for New Jersey. It is a source of respite and exercise for thousands of people living in Somerset, Mercer and Hunterdon Counties. Due to a variety of factors, including the over population of deer, the Sourlands have lost 20% of their trees since 2020, a crisis that will only accelerate without intervention. We MUST preserve this precious resource for future generations. I implore you to please designate the Sourland Mountain Region as an Area of Critical State Concern. Sincerely, Brice Batchelor Hall 53 Blue Heron Way Skillman, NJ 08558
carolyn@horacestreet.com	3/30/2025	[EXTERNAL] Sourlands!	I am writing to implore you to protect the Sourlands via the updated state development and redevelopment plan. The Sourlands are an incredible region for hiking, biking, and generally enjoying. They are also a climate resource to those of us who live here and in the surrounding communities. Please include the Sourlands in the plan! Thank you for your consideration. Carolyn Carter Singh Mobile: (917) 359-2357
stevedrake7@gmail.com	3/28/2025	[EXTERNAL] West Amwell resident concerned about The Sourland Mountain Region	Hello friends in NJ State government, I'm writingto say that the recent Town Topics and Bucks County Herald article by Laurie Cleveland, executive director of the Sourland Conservancy, impelled me to write to you. I live in the Sourland Mountain Region in a subdivision home in the Music Mountain Subdivision in West Amwell. I drive through the Sourland Mountains each day during my commute to Tenacre Foundation in Princeton. I do feel that the Sourland Mountain Region is an Area of Critical Concern with the area providing clean drinking water to 800,000 residents in NJ and PA. I also want to protect the area because of its designation as Continental Important Bird Area, one of only 113 in the U.S.Thank you for giving the idea more serious consideration as an Area of Critical Concern. Sincerely, Steve DrakeWest Amwell, NJ
	3/27/2025 6:33		The affordable housing plan which artificially mandates additional units for already overcrowded, overtrafficed is a horrible mistake. This boom for builders is a bust for residents. Stop this madness.No
Microsoft Forms Comment	3/27/2025		Please remember that all towns in New Jersey are not the same. The smallest towns have become so densely populated by building structures larger than it can hold. Traffic is an absolute nightmare. It has become so difficult for Pedestrian to walk across a simple county road without the fear of getting hit. Traffic patters are a nightmare and street parking has become ridiculous to navigate. Pause, take a moment to think about the people in your communities and not how you can increase your budgets by a 1.5%
tonirobbi@gmail.com	3/25/2025	[EXTERNAL] Sourlands Region	I've lived in the region for nearly 60 years, in E. Amwell Townsip. I was a Member of its Envornmental Commission and its delegate to the now historic Sourland Planning Council. We persuaded the many municipalities ranging from Lambertville to Duke Farms to zone their pieces of the Sourland consistent with preservation of the forest. It is ecologically important to the densely populated region of NJ to its south, including the Rte 1 corridor. Please designate it as critical in the State Plan. Anthony Robbi Sent from my iPad
ospmail@sos.nj.gov	3/25/2025	FW: [EXTERNAL] Sourlands: ACSC designation	Hello, I'm writing to ask the State Planning Commission to include the Sourland Mountain region- the largest contiguous forest in Central New Jersey- among the areas identified as n area of critical state concern (ACSC). The preservation and protection of open space is a net positive to all surrounding communities, and we depend on a healthy ecosystem for our own health and wellbeing. Many of my community feel the same. Thank you, Kirsten Shearer 30 2nd stHopewell, NJ 085256099330711
atnawrot@gmail.com	3/25/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Adam Nawrot Trenton, NJ Adam Nawrot848 - 391 - 5214atnawrot@gmail.comwww.adamnawrot.netwww.sourlandstudios.com
jay.weisbond@njlcv.org	3/25/2025	[EXTERNAL] New Jersey LCV Sign-On Letter for Consideration in the New Jersey State Plan	Attention: New Jersey Office of Planning Advocacyl hope this email finds you well!On behalf of the New Jersey League of Conservation Voters, I am sharing a sign-on letter containing our written comments for consideration in the New Jersey State Plan. Please find the attached PDF for your review.If you have any questions or need any further information, please feel free to contact me.Thank you for your time and consideration.Best regards, Jay Weisbond Jay WeisbondPolicy AssistantPronouns: he/himNew Jersey League of Conservation VotersOffice: 609.331.9922 Ext. 1013Cell: 813.351.0243PO Box 1237Trenton, NJ086071 N Johnston Avenue, Suite A250 Hamilton, NJ 08609www.NJLCV.orgFollow us onTwitterandFacebookMake a giftto New JerseyLCV

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doug.schleifer@gmail.com	3/25/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climater esource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Douglas M. SchleiferRingoes, NJ
margoserpe@gmail.com	3/25/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, As a concerned New Jersey resident, I urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 New Jersey and Pennsylvania residents rely on the Sourland Region to provide some or all of their clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Margo SerpeSomerset, NJ
thuy.a.le4@gmail.com	3/24/2025	[EXTERNAL] Please designate the Sourlands as an area of critical state concern	Dear Members of the State Planning Commission, I live in Hillsborough at the foothills of the Sourland Mountain. In just 30 minutes by bicycle, I am transported to the mountain region where I can hear spring peepers. I feel as if I am on vacation when I ride through the beautiful Sourlands. I joined the Sourland Conservancy to help protect this wonderful region and have since learned how vital this ecosystem is. NJ is a crowded state so it is more critical to protect the forests that we still retain. I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Thuy Anh LeSourland Conservancy member
morganwallacehelms@gma il.com	3/24/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned citizen who grew up in New Jersey to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Dennis J. Helms12 Poling Farm CourtBelle Mead, NJ 08502helmsesq@eticomm.net 908-930-2102
sproulwi@icloud.com	3/24/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	. Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. I am currently trying to reforest my property using native species, and the deer are destroying my efforts daily. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Willam Sproule, Hopewell NJ, in the heart of the Sourland.
byrnethebiker@gmail.com	3/24/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. I have been a New Jersey resident for over 60 and seen far too many natural areas destroyed by industrial, commercial, and residential development. I have explored New Jersey's outdoors from High Point to Cape May and from Washington's Crossing to Sandy Hook and the Sourlands are, without doubt, one of the special natural areas in New Jersey. I have crisscrossed the Sourlands on my bicycle and hiked many of its walking trails. The forest, wetlands, streams, and farms in the Sourlands are being squeezed by development from all sides. A comprehensive plan is needed to preserve the Sourlands. Please designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. Stephen P. ByrneBelle Mead, NJ908-313-2705
middlesexcountyboardofag @gmail.com	3/24/2025	[EXTERNAL] comments on the NJ State Development /Redevelopment Plan 2025	Attached please find the Middlesex County Board of Ag Land Use and Preservation Committees' comments on the subject plan. Thank you, Joyce Chagnon Secretary Middlesex County Board of Agriculture
dwpgriffith@gmail.com	3/22/2025	[EXTERNAL] Sourlands	.This area is a critical habitat for birds and extremely important for water conservation. and should berecognized In NJ State Planning.Residentof Sourlands, Diane P. Griffith
edaze811@hotmail.com	3/22/2025	[EXTERNAL] Sourland	. Dear Members of the State Planning Commission, As a concerned resident of New Jersey, I am writing to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region is home to the largest contiguous forest in Central Jersey and provides clean drinking water to over 800,000 residents in both New Jersey and Pennsylvania, according to The Watershed Institute. Unfortunately, this vital ecosystem is in crisis due to significant tree loss, mounting development pressures, and the inability to regenerate naturally, largely due to overbrowsing by deer. The Sourland Region is not only an invaluable climate resource but also a historic and cultural treasure, essential to the future of New Jersey's environment. Without strong protections, we risk irreversibly damaging this irreplaceable resource. Please act now to ensure that the Sourland Region receives the critical designation and support it needs. Sincerely, Ed Daisey Hillsborough Sent from my iPad

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rerick987@gmail.com	3/22/2025	[EXTERNAL] NJ State Development Plan comments	NJ State Planning Commission Thank you for the opportunity to comment on the recent NJ State Development plan draft.
			Comments are attached. Robert Erickson Middletown,NJ 732-337-4380
dmdf123@gmail.com	3/21/2025	[EXTERNAL] Urgent message	Designate the Sourlands as an area of central concern. This area is a precious environmental haven in our most denselypopulated state. Not protecting it now will have everlasting consequences to this vital naturalland. Please do everything to protect it. Sincerely, Donna Flesher Flemington, NJ
morganwallacehelms@gma il.com	3/21/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned citizen who grew up in New Jersey and has lived in Somerset county for over 30 years to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Meg Helms Proud homeowner in Montgomery Township for over 30 years 12 Poling Farm Court Belle Mead, NJ. 08502908-202-7972
bmaussie4@gmail.com	3/21/2025	[EXTERNAL] Re: Urgent: Designate the Sourlands as an Area of Critical State Concern	. O O Mar 21, 2025, at 10:38 AM, morganwallacehelms@gmail.com wrote:Dear Members of the State Planning Commission,I am writing as a concerned citizen who grew up in New Jersey and has lived in Somerset county for over 30 years to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Meg Helms Proud homeowner in Montgomery Township for over 30 years 12 Poling Farm Court Belle Mead, NJ. 08502908-202-7972
cjhoeschele@gmail.com	3/21/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over browsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Carolyn Hoeschele Skillman, NJ
jmol3125@gmail.com	3/21/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Jennifer O'Leary-ChenEast Amwell, NJ Jen O'Leary-Chen, RMT
alicejean516@gmail.com	3/21/2025	[EXTERNAL] Sourlands	.The Sourlands should be considered a Critical State Concern. The largest contiguous forest in central NJ, home to endangered birds and other species, source of water for 800,000 residents, and is vital to all NJ residents for carbon sequestering and oxygen production. Please include the Sourlands in your revised plan. Sincerely, Alice Macnow, Princeton NJ alicejean516@gmail.com
margilinden@icloud.com	3/21/2025	[EXTERNAL] Sourland Mts CSC designation	.Dear Members of the State Planning Commission,I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer.The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed.Sincerely,Marjorie LindenLawrenceville, NJSent from my iPhone

aradbil@fitzrad.com	3/21/2025		To the Members of the State Planning Commission,
		the Sourlands as an Area of Critical State Concern	As a resident of New Jersey, the Sourlands are treasured by me as a special place — a haven and refuge for many animals, insects and plants that contribute to the natural riches of the State.
			I respectfully ask that you designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. As you no doubt know, the Sourland Region hosts the largest contiguous forest in Central Jersey. In addition, over 800,000 residents in New Jersey and Pennsylvania obtain some or all of their drinking water from this region.
			The Region is in jeopardy: widespread tree loss from emerald ash borer and storms and drought, development pressure, and lack of natural regeneration due to overbrowsing by deer are slowly destroying the area.
			Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed.
			Sincerely, Alexandra Radbil 116 Moore Street Princeton, NJ 08540 cell - 609-558 -1877
helmsjuliam@gmail.com	3/21/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	. Dear Members of the State Planning Commission, I am writing as a concerned citizen who grew up in New Jersey to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Julia M. Helmshelmsjuliam@gmail.com 908.304.5317
msmith@fwwatch.org	3/21/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission,I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over browsing by deer.The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Matt SmithNew Brunswick, NJ
jerelyn15@comcast.net	3/20/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am a concerned Lambertville New Jersey resident and urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. NJ cannot afford to lose anymore trees. The emerald ash borer beetle has devastated NJ. The hillsides along the Delaware River are barren of healthy trees and all you see are just toothpicks of dead Ash trees. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Jerelyn Hoos 15 Clinton St Lambertville, NJ
devljacob@me.com	3/20/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Ken Jacob Skillman, NJ
donnadanna@comcast.net	3/20/2025	[EXTERNAL] The Sourlands is a critical area to protect!	Hello, My comment on the State Plan is that it must be changed to designate the Sourlands Region as an area in need of critical protections. The Sourlands Region is a respite from the overcrowded surrounding communities. We rely on the hiking trails, streams, birds, wildlife, and trees to renew our spirits while getting great outdoor exercise! The parking lots to the Sourlands trails are jammed full every weekend because this area is so important to New Jerseyans. This natural area is also vital to flood control and drinking water quality. Go there to see for yourselves and you will understand why it is vital that our State Plan include the Sourlands Area in the critical protection plan. Thank you, Donna D'Anna
cwzink@gmail.com	3/20/2025	[EXTERNAL] Sourlands	Deer State Plan Commissioners, Please include the Sourlands as an Area of Critical State Concerning in the updated New Jersey State Plan. The Sourlands contain extensive natural areas critical to maintaining New Jersey open space, freshwater, and fresh air, as well as providing habitat for much flora and fauna and recreation potential for people. Many people are concerned about the long-term stewardship of the Sourlands, and your support for this designation will be a significant factor in its future conservation. Thank you for your focus on New Jersey's environmental future. Kind regards, Clifford Zink

itflochor@gmc!!	2/20/2025	[EVTERNAL] Designate the Countries	Dear Mambers of the State Blancing Commission in 2012 healtheast the state and the state of the State Blancing Commission in 2012
jtflesher@gmail.com	3/20/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission,In 2012, I had the opportunity to produce a documentary film, "Sourlands," about the cultural and ecological value of the Sourland Mountain Region of New Jersey. There's no larger forest left between New York City and Philadelphia. To many residents, it feels miraculous that this natural area has survived in the nation's most densely populated urban corridor. It is of course no miracle, but through the tireless work of citizens, non-profits, municipal leaders, and state planners. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. Sincerely, Jared Flesher East Amwell Twp, NJ
herzberg@eps.rutgers.edu		[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a Hopewell resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. I am concerned because it:1) provides critical drinking water resources for more than 800,000 hundred residents in New Jersey and Pennsylvania2) is one of the most important carbon sinks in New Jersey, helping to combat climate change,3) is home to 57 state-listed, threatened, and endangered species and4) is a beautiful part of New Jersey where I walk the trails to gain inspiration for my landscape art.The Sourland Region is a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Claude Herzberg Hopewell, New Jersey Claude Herzberg Professor Emeritus Department of Earth and Planetary Sciences Rutgers University 610 Taylor Road Piscataway NJ 08854, USA herzberg@eps.rutgers.eduVirus-free.www.avast.com
snoyelle@comcast.net	3/19/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Sandra and Olivier Noyelle West Amwell, NJ
susanna.derosa1@verizon. net	3/19/2025	[EXTERNAL] ACSC inclusion for the Sourland Mountain Region.	Dear Members of the State Planning Commission,Since 1980 my husband and I have enjoyed living in the Sourland Mountains for which we feel richly blessed. My dogs and I have hiked along the many trails most days during all these years. I bring a group of adults there regularly to bathe in the lush ecosystem. It is critically important to preserve this resource not only for recreational healing but also to ensure the forest's unsurpassed ability to purify the environment. The water system is a crucial resource not only for human residents but it also supports numerous indigenous species of plants and animals. Please make funding and protections a priority for the Sourland Mountain region, including it in the plan for the Area of Critical State Concern (ACSC). It is essential to ensure this undisturbed natural part of our ecosystem remains a treasured resource for the State of NJ.Most respectfully, Susanna T DeRosahttps://innerspacetaiji.wordpress.com
yzt416@gmail.com	3/19/2025	[EXTERNAL] Include the sourlands	Please include the sourlands in the State development and redevelopment plan. This area is crucial to the state of NJI Thank you, Liz
chris.csider@yahoo.com	3/18/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over browsing by deer. The region is a key sink for carbon and acts as the lungs of the Philadelphia and New York metro areas. Without protection, the overall state of health in this massively populated region will decline. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Chris Csider Bridgewater, NJ
bittergk@hotmail.com	3/18/2025	[EXTERNAL] Designate the Sourland Mountain Region as an Area of Critical State Concern	. Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over browsing by deer. It is also a key area for birds migrating along the East Coast. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Gay Bitter Princeton, NJ

janetstern@earthlink.net	3/17/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, The New Jersey State Planning Commission is considering updates to the State Development and Redevelopment Plan, but the Sourland Region was not included as an Area of Critical State Concern—a designation that would provide much-needed protection and support for conservation efforts. I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey, but over a million ash trees alone have been destroyed in the Sourlands by the emerald ash borer, let alone the loss of trees from other insects, pests, and diseases (our beautiful native beeches are next); the increased frequency and intensity of storms, with worse predicted; and normal aging out.Planting replacement saplings is a step but an ineffective one that cannot compensate for the loss of mature trees. Only one in five saplings survive, especially in an area overrun with white-tailed deer. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, again, because of widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Janet Stern and Dr. George Theodoridis Princeton, NJ 08540
ckuster44@gmail.com	3/17/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Caroline KusterHillsborough NJ
goihman.ina@gmail.com	3/16/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. This is a gem we need to protect. Not much nature is left in NJ, especially in central NJ. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Ina SivriverHillsborough, NJ 08844
susanmichniewski@gmail.c om	3/16/2025	[EXTERNAL] Sourland Mountains - Area of Critical State Concern	Subject: Urgent: Designate the Sourlands as an Area of Critical State ConcernDear Members of the State Planning Commission, I live on the edge of the Sourlands and work with the Sourlands Conservancy to remove invasive vegetation, and plant and protect native species. This area is a gem and needs to be protected from unnecessary development, degradation form invasive species, and deer overabundance. Therefore, I urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer.The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed.Sincerely, Susan Michniewski Hopewell Township, NJ
eric.teitelbaum@gmail.com	3/16/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Eric TeitelbaumHopewell, NJ
olivia.spildooren@gmail.co <u>m</u>	3/15/2025	[EXTERNAL] URGENT: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Olivia Spildooren Ewing, NJ

drpillsbury@gmail.com	3/14/2025	Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely,
			Don Pillsbury Lawrenceville, NJ
andrews.james.t@gmail.co m	3/14/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, James T Andrews Hopewell, NJ 08525
john.kalinowski@att.net	3/14/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned East Amwell Township, New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. This fragile ecosystem is in crisis: widespread loss of ash trees caused by the invasion of the emerald ash borer, growing real estate development pressure further fragmenting the habitat, and over-browsing by deer consuming vegetation at a rate that exceeds the forest's capacity to regenerate thereby potentially leading to the extinction of some local plant species. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. With New Jersey presently experiencing drought conditions it is more important that ever to protect all water resources. Not only is the Sourland Region a key climate resource, it also a beautiful and tranquil region where people can find calming respite from the angularity, noise and rush of city life. The Sourland Region's trails and preserved nature areas are available for all to enjoy and explore. Without strong protections we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Thank you for your consideration, John Kalinowski154 Cider Mill RdFlemington, NJ 08822
mdverna@gmail.com	3/13/2025	[EXTERNAL] Urgent: Sourlands Should Be a Critical Area of Concern	I've lived in Hopewell Township, Mercer County, for over 25 years and strongly urge you to include the Sourlands as an area of critical concern. The Conservancy has been an excellent steward, but won't be able to sistain its work without state resources. We need to protect these areas in Mercer and Hunterdon Counties; they are all we have to protect rare species of flora, fauna, birds, a d herpevores. Please add the Sourlands to the list. It is one of the most beautiful areas of the state. Thank you, Marie Verna
wstansley@aol.com	3/13/2025		Dear Members of the State Planning Commission, I urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. One needs only to look at an aerial view of the Sourland Mountains to appreciate how unique this forest is — the largest contiguous forest in central New Jersey and the source of drinking water for more than three quarters of a million residents in New Jersey and Pennsylvania. Having lived in the Sourland Mountains for more than 30 years, I am well aware of the threats posed by development pressure, tree loss, and over browsing by deer. The Sourland Conservancy has estimated that the region will lose a million trees to the emerald ash borer. A hike through the woods here is a sobering reminder of the magnitude of this loss. The Sourland Region is a key climate, historic, cultural and recreational resource. We need strong protections to ensure that we do not lose this unique and valuable resource. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed to protect the it for future generations. Sincerely, William Stansley47 Ridge RoadHopewell, NJ 08525
tmonninger@hotmail.com	3/13/2025	[EXTERNAL] Designate Sourland mountain Region as Area of Critical State concern	Members of State Planning Commission as a life long resident of Skillman, NJ I ask that you seriously consider this Sourland Mountain region be the ACSC list. Over my 45 years on Hollow Rd I have witnessed the tremendous loss of wildlife and vegetation here. Many years ago, my children would spend afternoons looking for crawfish in Rock brook or marvel at the orange newts. I haven't seen one of those in years. In the summer we would sit on the porch and listen to the woods alive with owls, fox and bull frogs. Keep NJ beautiful for years to come, protect the watershed and have respect for our history. Respectfully, Teresa Monninger Skillman, NJ Sent from my iPad

stkenf@gmail.com michael.r.thayer@gmail.co m	3/13/2025 3/13/2025	[EXTERNAL] Sourland Mountain Region [EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Shari Kenfield360 Ridgeview RdPrinceton, NJ Dear Members of the State Planning Commission, My name is Michael Thayer, and I am a resident of Bridgewater, New Jersey. I am writing to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The
			Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. In addition, it serves many people as a place to hike, enjoy nature, and to just "get away from it all". It's a place I've enjoyed going with my family on many occasions, and I know many other families have appreciated it as well. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Michael Thayer Bridgewater, NJ
dl35@comcast.net	3/13/2025	[EXTERNAL] State Plan	Hi, When is the last day that the public can comment on the updates to the state plan? How were the meetings publicized? Thank you, Lori Howard
tevans@njfuture.org	3/13/2025	[EXTERNAL] Recommendation and comment on the Draft Preliminary State Plan	Please find attached a letter from a group of organizations and individuals who care about the state planning process, recommending that the updated StatePlan call for the future adoption of a comprehensive, geographically based framework for adapting to climate change. Please feel free to contact me with any questions. Thank you for your attention to this matter. Tim EvansResearch DirectorNew Jersey Future Tim EvansDirector of Researchtevans@njfuture.org16 W. Lafayette St.Trenton, NJ 08608cell: 215-285-0072office: 609-262-3552 (direct line)main office #: 609-393-0008
4charlizebk@gmail.com	3/12/2025	[EXTERNAL] The Sourlands	Please protect this valuable region. These hills provide much of the drinking water for the center of NJ. Thank you , Charlize Katzenbach Hopewell NJ Sent from my iPhone
jpatmeadowbrook@gmail.c om	3/12/2025	[EXTERNAL] Sourlands inclusion in State Plan	The Sourlands deserve protection from any developments or degradation to this important habitat. Important safeguards must be put inplace to insure efforts to save lands, water, and wildlife have a healthy future. We need strong conservation policies in New Jersey. Joanne Pannone 215 Meadowbrook Rd, Robbinsville, NJ 08691
gwalther@peratonlabs.co m	3/12/2025	[EXTERNAL] Please Designate the Sourlands as an Area of Critical State Concern	Hello Committee Members, I am a supporter of the Sourland Conservancy and a New Jersey resident, and I am writing to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey and supplies some or all of the drinking water to over 800,000 residents in New Jersey and Pennsylvania. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over-browsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Thank you. Gary Walther Middlesex, NJ
aplove@gmail.com	3/12/2025	[EXTERNAL] Request to designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, It has come to my attention that the Sourland Mountain Region is not recognised as an Area of Critical State Concern in the updated State Plan. I feel strongly that this would be an important safeguard for this unique region. The Sourland Mountains are home to the largest contiguous forest in Central Jersey. The Watershed Institute estimates that more than 800,000 residents in New Jersey and Pennsylvania rely on this region to provide much of our clean drinking water. Over the years I have lived in the Princeton area I haveseen themountingpressures on this fragile ecosystem. It is getting to a crisis state, especially with the recent widespread tree loss from drought, diseaseand invasives like EAB that has had a devastating impact on the ash tree that was so widespread in this area; ongoing development pressure; and lack of natural regeneration due to overbrowsing by deer. Princetonhas done a good job bringing some control to their deer population, I wish the same could be done on the Sourlands. The Sourland Region is an important resource, from a climate, historic, cultural and recreational perspective, and hasthe potential to remain a vital part of New Jersey's social and environmental future. Without strong protections itrisks losing this vitalplace and role in ourregion. The Township of Hopewell, on Jan 27 2025passed Resolution#25-60clearly outlined the issues facing this region and the desire to support this area both to protect itfrom further pressures from development as well seeing the need to address these issues degrading this important area. For the State Planning Commission to recognize the Sourland Region as an Area of CriticalState Concern would help establish the importance of this region, recognise the pressures if faces as well as provide another level of protection to this loved and appreciated area. Please work to ensure that the Sourland Region receives the designation and support so urgently needed. With gratitude for the work you do for our co
michiosoga@yahoo.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Michio SogaPrinceton, NJ 08540

wgnancy@aol.com	3/12/2025	[EXTERNAL] Designate the Sourland Mountains an Area of Critical State Concern	Dear Members of the State Planning Commission, I live in East Amwell, home to rolling farmland and the Sourland Mountains. I am writing as a concerned resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. As a Township entirely on well water, the Sourlands helps provide critical protection for our limited groundwater. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource and a historic and cultural treasure, Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Nancy CunninghamEast Amwell, NJ
lkoplik@comcast.net	3/12/2025	[EXTERNAL] Sourland Mountain Region	Dear Members of the State Planning CommissionPlease add my name to the list of NJ residents who strongly urge you to designate the environmentallysensitive and important Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan.Thank you, Lawrence Koplik
kea52@cornell.edu	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central New Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. As someone who has lived in the Sourlands for almost my entire life I can vouch first hand for the unique beauty of this area and thehelp it needs to continue on in a fight against deer, invasives and development. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Kelly Albanir Lambertville, NJ
egodwin@vancleefenginee ring.com	3/12/2025		Good morning, I'm an urban planner attached to a private planning and engineering consulting firm. I've attended several information sessions regarding the update to the State Plan, and wished to make a comment on an issue I have with the Preliminary Draft made available on the Office of Planning Advocacy's Website:In the Glossary section, on Page 91, the Preliminary Draft lists the following definition for Form-Based Code: "Form-Based Code means a zoning code that encourages Mixed-use Development while accentuating the form and function of public and private facilities." As a semi-recent graduate from a top-rated urban planning program, the topic of non-Euclidean zoning is rather near and dear to my heart. I therefore find this definition of form-based codes not only incomplete, but likely confusing to a layperson into believing that planners speaking of form-based zoning are advocating for something other than they actually are. In the interest of completeness, I propose the following revised definition: "Form-Based Code means a zoning code that establishes regulations for permitted development based on acceptable forms of buildings, facades, and other visual and design elements. Such codes incorporate visual references of desired built conditions as a guide for development in their established zones. Form-based codes may be designed to supplement other land use regulations, such as conventional zoning based on regulation of permitted uses, or adopted as the primary zoning code. "This definition better captures the basic distinction between form-based and conventional (use-based) zoning codes, without diverging into mechanisms that are not inherently part of a form-based regulation, e.g. many form-based codes encourage mixed-use development by deemphasizing use as the primary basis of zoning, but it is not a requirement that a form-based code do this. This in turn, makes it easier for any lay reader to understand what planners at all levels mean when discussing form-based codes. I hope you will take this comm
jdogwood@aol.com	3/12/2025	[EXTERNAL] Protect the Sourlands	Dear committee members, Please designate the Sourlands as a critical area requiring protections. The forest provides clean drinking water for thousands of NJ residents. The vast forest also helps stabilize our climate and temperature. It contains many native flora and fauna and is a vital stopping ground for migrating birds. It is a fragile eco-system that has recently lost over a million trees through disease. The deer population is destroying the understory or the forest. For us, and for future generations, let's do the right thing and protect this fragile environment and help celebrate NJ as " The Garden State" Bob Eckardt Belle Mead, NJ
ccucchiara@dorisduke.org	3/12/2025	[EXTERNAL] Support Sourlands	As a District 16 constituent a firmly support including the Sourland Conservancy in an Area of Critical State Concern.Thank you,Carl Cucchiara
rsvpdock@aol.com	3/12/2025	[EXTERNAL] Sourlands Protection	Let me add my voice to those who want the Sourlands to be protected as both a natural resource, important to the people of Central New Jersey, and to the habitat they provide for our dwindling endangered species. Please include the Sourlands on your list of "Important areas to protect. "Robert Platten90 Fiddlers Creek Raid, Titusville, NJ
stoneybrook50@comcast.n et	3/12/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident, who lives in the Sourland Region, to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Erica Johanson 50 Stony Brook Road East Amwell Township, NJ

galoia1@yahoo.com	3/12/2025	[EXTERNAL] Designate the Sourlands as an	To: Members of the State Planning CommissionFrom: Concerned NJ residentl am writing under the assumption
		Area of Critical State Concern	that you are open to reasonable feedback regarding the work of your Commission; and as a dues-paying member of the non-profit Sourlands Conservancy. I am incorporating, below, the rationale as developed by The Conservancy. I urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with this widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed.Best,Gregory AloiaLambertville, NJSincerely,
jbergeron@optonline.net	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am a concerned New Jersey resident urging you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and overbrowsing by deer.It is extremely difficult, if not impossible, to reclaim natural, healthy ecosystems once they degrade. I rely on the trails in this region for my exercise, mental health and recreation. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this resource forever. Please act now to give the Sourland Region the designation and support that it and we deserve. Sincerely, Jeanette Bergeron Hamilton, NJ
genegaffney373@comcast. net	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I have lived in the Sourlands for 50 years, so know very well the importance of its forests and wetlands to New Jersey. I also see how
			fragile it has become, as I watch the increasing number of deer wandering behind our house. We have a well that is dependent on keeping the water safe and clean. As we move into worsening climates, we desperately need to protect the Sourlands. Please ensure that it receives the designation of an Area of Critical State Concern.
			Sincerely, Barbara Gaffney Hillsborough NJ
cschaeder.batterman@gma il.com	3/12/2025	[EXTERNAL] Sourlands: Area of Critical State Concern	Dear Members of the State Planning Commission, I am a lifelong New Jersey resident, a voter and a former resident of the Sourlands; our family lived in East Amwell for 25 years. I am writing to implore you to please designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. This region is of utmost importance to NJ and is in crisis: According the The Watershed Institute, the Sourland Mountain Region provides critical drinking water resources for more than 800,000 hundred residents in New Jersey and Pennsylvania; The Sourlands is one of the most important carbon sinks in New Jersey, helping to combat climate change; The entire Sourland Mountain Region is a designated Continental IBA (Important Bird Area) macrosite. It is one of just 113 such sites in the United States; The Sourland Region is home to 57 state-listed, threatened, and endangered species; The Sourland forest has lost approximately 20% of all trees since 2020 – with tree loss accelerating due to invasive species (like the emerald ash borer) and deer overpopulationThe Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support it so urgently needs. Thank you, Catherine Schaeder Princeton, NJ
dpace4114@msn.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I have been following the progress of the Sourland Mountain Region for many years and applaud the work of many local governments and local non-profits to protect and preserve the Sourland. Now you can too by designating it an Area of Critical State Concern in the updated State Plan.The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Daniel PacePennington, Nj
npoland@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Nikita Poland Lambertville NJ

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gatesi.photo@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourland Region as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. As a resident of the Sourlands, I am acutely aware of the region's importance and the growing threats it faces. The Sourland Region is a vital natural resource. The Watershed Institute's research highlights the critical role it plays in providing clean drinking water for over 800,000 New Jersey residents. Furthermore, the region's expansive forest is essential for carbon sequestration and climate resilience. The Sourlands is the largest continuous forest in Central Jersey, this unique trait allows it to host species of plants and animals not often found in other regions, and provides critical stopover grounds for migrating birds. We must also not forget its value as a source of recreation and natural beauty. However, the Sourlands are under immense pressure. The documented tree loss, driven by a variety of threats such as the emerald ash borer, beech leaf disease, invasive plant species, over-development, all of which is exacerbated by deer overpopulation and browsing, is a serious concern. This lack of natural regeneration threatens the long-term health of the forest and its ability to provide the essential ecosystem services we depend on Designating the Sourland Region as an Area of Critical State Concern is not just an environmental imperative; it's a strategic investment in New Jersey's future. By implementing strong protections, we can ensure the continued supply of clean water, maintain biodiversity, and mitigate the impacts of climate change. It's up to us to preserve our ecological heritage for future generations, so much of which has already been lost. I urge you to prioritize the Sourland Region in your planning decisions and take immediate action to secure its future. Sincerely, Jeff GatesEast Amwell, NJ
tacotron2000@gmail.com	3/12/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Dennis McCarthy Hillsborougn, NJ
amurabito@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. As a resident of Lambertville, I am reminded daily of our ties to and dependence upon the land, and the Sourlands in particular. We're located at the southern terminus of the region, and are dependent on the Sourlands for clean drinking water and flood mitigation. Additionally, where the Sourlands and the Delaware River meet is a critically important area for wildlife habitat and diversity, and the natural beauty of this confluence supports economic activity in our town that creates jobs and provides residents with a wonderfully unique place to live. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Adam MurabitoLambertville, NJ
erikcjohnson@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Erik Johnson Pennington, NJ
shelley.krause@gmail.com	3/12/2025		Dear Members of the State Planning Commission, I consider the Sourlands as a significant regional treasure and public good, so I am writing today to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. As you probably know, the Sourland Region hosts the amazing Stoutsburg Sourland African American Museum as well as the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, facing widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. We have lived in Mercer County for almost 25 years. During his formative years, our son learned to rock climb and boulder in the Sourlands. The Sourland Region is a wonderful gateway to the natural world, a key climate resource (one of the most important carbon sinks in New Jersey!), a historic and cultural treasure, and a vital part of New Jersey!s environmental future. Without strong protections, we risk losing this important resource forever. Please make a commitment to ensuring that the Sourland Region receives the designation and support so urgently needed in peace, Shelley Krause Princeton, NJ:- Shelley Krause (she, her - why it matters) College Lists Wiki (250- counselor-curated lists)But Wait, There's More! (personal blog)@butwait on Twitterhttp://www.linkedin.com/in/butwait on LinkedInA person is a person through other persons. — Zulu proverb
jekcesari@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, A meaningful connection to nature, and place based learning near one's home is essential for human wellbeing, especially youth wellbeing!!! Save one of our greatest resources for nature connections in central NJ!! am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Julie Cesari Pennington, NJ

terrycohn@hotmail.com	3/12/2025	Sourlands as an Area of Critical State	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State
alexstollery0@gmail.com	3/12/2025	Concern [EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Plan.Sincerely,Terry CohnFair Lawn, NJ Dear Members of the State Planning Commission,I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer.The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed.Sincerely,Alex StolleryBernardsville, NJ
ryne.beeson@gmail.com	3/12/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Ryne Beeson Princeton, NJ
kirsi.paalanen@gmail.com	3/11/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Kirsi Bhasin Pennington, NJ
carolyncartersingh@gmail.c om	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission,I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, CarolynCarolyn Carter Singh (917) 359-2357
hpersky@ETS.ORG	3/11/2025	[EXTERNAL] Designating Sourlands as Area of Critical State Concern	Dear Members of the State Planning Commission, I was very troubled to learn that the Sourland Mountain Region was not designated as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to over-browsing by deer. Now more than ever, it is critical to protect this region to make us more climate resilient, for the sake of our water supply, and simply given the value of this region to so many. Please: act now to ensure that the Sourland Region receives the designation and support so urgently needed. Many thanks for your kind attention! Hilary PerskyPrinceton, NJThis e-mail and any files transmitted with it may contain privileged or confidential information. It is solely for use by the individual for whom it is intended, even if addressed incorrectly. If you received this e-mail in error, please notify the sender; do not disclose, copy, distribute, or take any action in reliance on the contents of this information; and delete it from your system. Any other use of this e-mail is prohibited. Thank you for your compliance.
m.s.sonnen@gmail.com	3/11/2025	[EXTERNAL] Sourlands Designation- Area of Critical concern	Dear Members of the State Planning Commission, The Sourland Mountain region is the only nearby place left to see intact forest conditions and find habitats free from invasive species. For those of us working in agriculture in the region, it is an irreplaceable resource. Only there can you see what plants and animals SHOULD be in this area. It is only so well preserved because of volunteers who diligently keep out or remove human caused disruptions like privet, Japanese honeysuckle, litter, and illegal dumping. The current biggest threat is the deer population. Through studying the Sourlands my family has a better understanding of our own farm's conditions and what plant species indicate the health of our soil. We are currently improving our soil by increasing organic matter levels, managing shade and moisture, and keeping our water ways clear and thoughtful. Beyond the personal- this region provides the drinking water of nearly a million New Jersey residents. Keeping it clean and managed is directly connected to our groundwater and health. Please help us preserve our future. The Sourland Region is a key public health resoura unique ecosystem, and a vital part of my community. Please help our community stay safe. Sincerely, Meredith S. SonnenFreedom FarmsKingwood Twp Njmobile - 724.255.5312
eacuna@udel.edu	3/11/2025	[EXTERNAL] Please Designate the Sourlands as an Area of Critical State Concern	Thank you for your consideration. The Sourlands represent some of the most diverse and beautiful woodlands and wetlands left in Central Jersey. They deserve our protection and stewardship.Evan AcunaCherry Hill, NJ
sdg385@gmail.com	3/11/2025		Why was the Sourland Mountain Region not designated as an Area of Critical State Concern?The Region hosts the largest contiguous forest in Central Jersey. It is a key climate resource, a historic area (are we not protecting American Revolutionary sites due to NEXT YEAR'S Semiquincentennial? Nor are we protecting the history of the freed & mp; enslaved African Americans who made the Sourlands their home?) and a vital part of New Jersey's environmental future. Act now to ensure that the Region receives the designation & mp; support it needs. Sincerely, Somattle D Guman Lawrence Township, NJ

chorn33@comcast.net fall4ever@hotmail.com rick.rosenberg@gmail.com	3/11/2025 3/11/2025 3/11/2025	Sourlands as an Area of Critical State Concern [EXTERNAL] Sourlands is a state treasure	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Carolyn HornSkillman, NJSent from my T-Mobile 5G Device The Sourlands are one of the very best that NJ has to offer. It provides space for all people and wildlife. Mark Paulino Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and s
mcmoore321@yahoo.com	3/11/2025	[EXTERNAL] Pleaael Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. With the emerald ash borer killing off the tree canopy, the Sourland region is in desperate need of support. Old growth forest and critical habitats are at risk. Sincerely, Meredith MooreNJ Conservation Foundation Board member/Pennington, NJ
scubascot09@gmail.com	3/11/2025	critical area of concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. I realize that our new administration has left us all in turmoil. That is why areas of local concern matter more than ever. Please don't let a beloved area that many live in and work in be neglected, sincerely, Jean Richmond
schmidtwwp@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission: I live in the Sourlands and am writing today to implore you to designate this area as an Area of Critical State Concern. The woods here support many rare and threatened species including Barred owls, wood turtles, Cooper's hawks, and many neotropical birds who migrate through here annually. There are also bobcats, and while I have never spotted one in person I have found their tracks in snow and mud near where I live. This area is the headwaters for streams and provides drinking water for 800,000 residents in New Jersey and Pennsylvania. More than ever, we need to protect this area. We need help planing more trees to replace the million ash trees that were killed by an invasive insect. Please act now to ensure that the Sourland Region receives the designation and support so desperately needed. Sincerely, Mary Schmidt Hopewell, NJ
kauzmann@verizon.net	3/11/2025		Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Maria Kauzmann Skillman, NJ
asgeci@aol.com	3/11/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical Concern	Subject: Urgent: Designate the Sourlands as an Area of Critical State ConcernDear Members of the State Planning Commission,I am writing as a concerned New Jersey resident and a Professional Ecologist with over 50 years experience working in New Jersey to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. Protection of this critical forest area also mitigates catastrophic flooding of down gradient communities and preserves critical habitat for rare, threatened and endangered plants and wildlife. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Amy Greene, ESA Certified Senior EcologistAmy GreeneAsgeci@aol.com908-963-9663

melissa.printon@gmail.co m	3/11/2025	[EXTERNAL] Subject: Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The quality of water in this region is of particular concern to me personally. I am a homwowner and get my water from a private well. Two years ago the wellwater was tested and several contaminants were present including PFAS. I can no longer drink or cook with the water that comes out of the tap. I worry that it is only a matter of time that this becomes the norm. We must take action to halt this process of degradation of the water supply. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. This Sincerely, Melissa Printon Hopewell, NJ
gboodoo@hotmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Gwyneth BoodooHopewell Township, NJ
margaretsouthwell34@gm ail.com	3/11/2025	[EXTERNAL] The Sourlands	I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Margaret SouthwellMenageriebyM.comMargaretsouthwellceramicrestoration.com
terrysmithpobox@gmail.co m	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Terry SmithPennington, NJ
jmglass0022@gmail.com	3/11/2025	Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, and provides habitat for threatened and endangered birds. It is also home to historic and cultural treasures, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Best, Judith Glassgold4 Wertsville RoadHillsborough, NJ 08844
veggiekari@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Karin LloydHopewell, NJ
teresawliu@gmail.com	3/11/2025	[EXTERNAL] Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Teresa LiuHillsborough, NJ

howardgyu@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, one of the best outdoorareas in NJ enjoyed by all, and wiithout strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Howard YuPrinceton, NJ
maryaalbert@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	I am writingas a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Mary AlbertHopewell, NJ
alicejean516@gmail.com	3/11/2025	[EXTERNAL] Sourland MT Region	Subject: Urgent: Designate the Sourlands as an Area of Critical State ConcernDear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, [Alice Macnow] [Princeton, N.J]
purtillj@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Julia PurtillHopewell, NJ
j611617@gmail.com	3/11/2025	[EXTERNAL] Urgent: Designate the Sourlands as an Area of Critical State Concern	Dear Members of the State Planning Commission, I am writing as a concerned New Jersey resident to urge you to designate the Sourland Mountain Region as an Area of Critical State Concern in the updated State Plan. The Sourland Region hosts the largest contiguous forest in Central Jersey. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourland Region to provide some or all of our clean drinking water. However, this fragile ecosystem is in crisis, with widespread tree loss, development pressure, and lack of natural regeneration due to overbrowsing by deer. The Sourland Region is a key climate resource, a historic and cultural treasure, and a vital part of New Jersey's environmental future. Without strong protections, we risk losing this important resource forever. Please act now to ensure that the Sourland Region receives the designation and support so urgently needed. Sincerely, Jeff Mechanic Hopewell, NJ
Astringe@atlantic.edu	3/10/2025 3:52		Very comprehensive. Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral comment! think it was very good that Equity was included in the goals.
Astringe@atlantic.edu	3/9/2025 18:23		No
Astringe@atlantic.edu	3/9/2025 18:07		NJ over development is destroying our natural environment. We are loosing natural habitat for wild life. We are loosing trees at an alarming rate, I don't believe any agency is providing a survey of the trees we had and what we are now loosing. We were one known as "The Garden State". Now we are becoming the "Over Developed State". No
rebeccagroovypeace@gmai	3/9/2025 12:12		Bernardsville has a downtown area that in my opinion is underdeveloped, and would serve the community well if it was developed. I find that the major sticking points in this area are community traffic concerns, and safety concerns, specifically for pedestrians trying to take advantage of the businesses we have to offer, but generally feel unsafe when large trucks are driving through town at high speeds. I have been a member of Borough Council since 2018 and have found that any updates to the traffic control on SR-202 are not being addressed. I understand that there are many towns in Somerset County and elsewhere that have higher accident rates and pedestrian fatalities, but I hope that there is some time that can be spent analyzing some of the quick fixes that can be implemented in order for people to feel safer walking, and be more open to development possibilities. There is a great disparity at the corner of 202 and Mount Airy road, just as an example, because on the Mount Airy road side (county road) there is a very narrow and dangerous sidewalk, whereas on the Anderson Hill road side, the sidewalk is 5+ feet wide. It has been brought to my attention that his is inequity in development, and at the very least should be fixed quickly because it leaves a perception among residents that the governing officials are preferring the residents on one side of town over another. No
thomaspaulconway@gmail.com	3/7/2025 12:00		The Preliminary State Plan should include language regarding affirmative measures to extend sewer and water to inclusionary sites or to allow on site treatment for designated inclusionary sites in municipal housing elements and fair share plans. This is especially important for sites that have been or will be designated for inclusionary development in Planning Areas 3, 4 and 5. The existing State Plan incorporated the idea of critical environmental sites in Planning Areas 1 and 2. I would propose a similar process of showing critical affordable housing sites in Planning Areas 3, 4 and 5. These are sites that municipalities have or will designate to accommodate higher densities provided that there is a set-aside benefitting low and moderate income households. I would urge mapping of these sites and language recognizing the mythouseholds with public water and sewer to advance satisfaction of the constitutional low and moderate income housing obligation.No

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<u>Darlene.Green@collierseng</u> .com	3/7/2025	[EXTERNAL] Draft State Plan Comments: High Bridge Borough (HIP001A 3.7.25)	Good afternoon, Please find attached the Borough of High Bridge's comments regarding the Draft State Plan. Thank you. Darlene A. Green, PP, AICP Senior Project ManagerSenior Associatedarlene.green@collierseng.comDirect: 908 200 2801 [-0El: 732 284 7684 Main: 877 627 37725helbourne at Hunterdon 53 Frontage Road Suite 110 Hampton, New Jersey 08827colliersengineering.com affiliated authorized entities DISCLAIMER This e-mail is confidential. It may also be legally privileged. If you are not the addressee you may not copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system and notify the sender immediately by return e-mail. Internet communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability for any errors or omissions. Any drawings, sketches, images, or data are to be understood as copyright protected.
Dariene.Green@collierseng .com	3/6/2025	[EXTERNAL] Draft State Plan Comments: East Hanover Township (EHT001A 3.6.25)	Good afternoon, Please find attached the Township of East Hanover's comments regarding the Draft State Plan. Thank you.Darlene A. Green, PP, AICP Senior Project Manger PlanningSenior Associatedarlene.green@collierseng.comCell: 732 284 7684 Main: 877 627 3772Shelbourne at Hunterdon 53 Frontage Road Suite 110 Hampton, New Jersey 08827colliersengineering.com affiliated authorized entities DISCLAIMER This e-mail is confidential. It may also be legally privileged. If you are not the addressee you may not copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system and notify the sender immediately by return e-mail. Internet communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability for any errors or omissions. Any drawings, sketches, images, or data are to be understood as copyright protected.
kholton@ringwoodnj.net	3/5/2025 9:45		testNo
janecannon2012@gmail.co m	3/5/2025	[EXTERNAL] survey feedback	Provide more information to municipalitiesabout products and appliances builders can incorporateinto development projects including heating and cooling pumps and solar (alternatives to oil and gas) so the planning boards can encourage builders. Provide a list of companies that will install green energy products for home owners and businesses so products are accessible. Get that information out there for residents and businesses. There currently is not a great deal of information out there and there is also disinformation. Residents are worried to switch to renewables because they fear they may not work or productsand processes are complicated. Streamline solar so home ownersare not at the mercy of solar power companies. There is a lot of distrust. Work with electric companies to monitor solar production and submit production directly to the state instead of relying on an archaic database for SREC.Jane
Sanjana.Arunchalam@cam dennj.gov	3/4/2025	[EXTERNAL] RE: (EXTERNAL) RE: Inquiry About Public Meeting for State Development and Redevelopment Plan in Camden County	Yes, I reached out to the County and received the link. Thanks!
cscancarella@englewoodcli ffsnj.org	3/3/2025 11:09		do not trust the nj dep to protect nature in this state. look at their assault on sparta mountain to provide home for a bird that never lived here at all. this dept is an assaulter and deveoper pal, and does not protect the natural world at all. every single piece of open land is projected to make money on by putting cement on it. you kill the few wildlife we have left in this state. the entire dept is primed for money, greed, selfishness and destruction of nature that god gave us. you need to change direction before we all die from this assault. how doyou get to see the entire plan so you can specifically talk about it. No
Sanjana.Arunchalam@cam dennj.gov.	3/3/2025	[EXTERNAL] RE: (EXTERNAL) RE: Inquiry About Public Meeting for State Development and Redevelopment Plan in Camden County	Hi Lisa, I just wanted to follow up on my previous email regarding a potential virtual attendance option for Camden's upcoming meeting. I would greatly appreciate any updates or information you can share about this. Thank you, Sanjana Arunachalam Urban Planner Camden Redevelopment Agency
tom@musconetcong.org	2/28/2025 10:10		2050 Statewide Planning Goals, Strategies, and PrioritiesSpecific comment related to a specific goalInfrastructurel am very happy to see the prioritization of pedestrian and bicycle safety and transit. This is critical to the well-being of our communities. * People need to be able to go about their lives without a car. This is very important to younger residents as well as seniors, as either may be incapable or unwilling to drive. * Going to the grocery store, work, or school are things everyone needs to do at some point, but many residents have no safe way to get to these destinations without a car. * Access to NYC and Philadelphia via NJ Transit is crucial for a significant percentage of the work force. It attracts people to our state. People move here for this access. * The NJ Turnpike is great as is. It does not need expansion. No one moves here for the Turnpike. They move
mcoogan@acnj.org	2/28/2025	[EXTERNAL] ACNJ Comments on Preliminary Draft of State Development & Redevelopment Plan	here for rail and bus service. Attached please find the commentsof Advocates for Children of New Jersey (ACNJ) on the Preliminary Draft of the State Development and Redevelopment Plan. ACNJ appreciates the opportunity to share our thoughts on the draft state plan. Please let me know if there are any questions. Mary— Mary E. Coogan, Esq. President & Dramper (CEOAdvocates for Children of New Jerseymcoogan@acnj.org(973) 643-3876Join us at our monthly Lunch and Learns: Advancing Advocacy One Conversation at a Time!

	2/22/222	[I
Sanjana.Arunchalam@cam dennj.gov.	2/28/2025	About Public Meeting for State Development and Redevelopment Plan in Camden County	Hi Lisa, I wanted to know if there will be a virtual attendance option for Camden's upcoming meeting. I'd appreciate any information you can provide. Thank you, Sanjana Arunachalam Urban Planner Camden Redevelopment Agency
Icleveland@sourland.org	2/28/2025	[EXTERNAL] Sourland Mountain Region Area of Critical State Concern	February 28, 2025New Jersey State Planning CommissionNew Jersey Office of Planning AdvocacyP.O. Box 204Trenton, NJ 08625Dear Members of the State Planning Commission:As organizations dedicated to environmental conservation, water quality protection, and responsible land stewardship, we write to express our strong support for designating the Sourland Mountain Region as an Area of Critical State Concern (ACSC) in the final State Development and Redevelopment Plan. The Sourland Region is one of New Jersey's most ecologically significant landscapes. Spanning more than 90 square miles across three counties, it serves as a critical wildlife corridor, a carbon sink that helps mitigate climate change, and a natural filtration system for clean air and water. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourlands for some or all of their drinking water. Despite its ecological importance, the Sourland Region faces unprecedented threats, including the Emerald Ash Borer infestation, Beech Leaf Disease, overbrowsing by deer that prevents forest regeneration, invasive plant species, and increasing development pressures. Without immediate intervention, these challenges will have long-term consequences for water quality, biodiversity, and climate resilience in the region. By designating the Sourlands as an ACSC, the State Planning Commission can provide much-needed recognition and support for conservation efforts. This designation would create opportunities for increased funding for forest restoration, facilitate regional coordination on effective deer management strategies, and help ensure that future development is compatible with the ecological integrity of the region. The Sourland Conservancy, in partnership with the undersigned organizations, has been actively working to preserve and restore the Sourland Mountain Region's rich ecological and historical heritage. Through land preservers and restore the Sourland Mountain Region's rich ecological and historical herit
Michellehorner@yahoo.co m	2/27/2025 11:28		There is too much redevelopment and not enough facilities for residents. For example the county seat, Somerville needs a Rec center, to be used by kids, adults & non profits & an emergency center for times like the floods & fires & code blues. Our supposed warming centers in Code Blues are not available - this could be facilitated in the rec center, have a room with cots, bathroom & showers. There are empty business buildings that may be able to be used? Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentWhy isn't every apartment developer mandated to have units set aside for low-income families, same goes for builders? Clearly the need is there. Also why aren't land lords mandated to keep dwellings up to code and healthy, there are plenty of places that are way under par?No
Sanjana.Arunchalam@cam dennj.gov	2/26/2025	[EXTERNAL] RE: (EXTERNAL) RE: Inquiry About Public Meeting for State Development and Redevelopment Plan in Camden County	Thank you very much.
ibelcaro@yahoo.com	2/24/2025 19:10		Climate Change and Infrastructure in Essex County. We are flooding due to undersized and antiquated drainage systems in Essex County Roads. We are losing our cars, home values and insurance coverage at an alarming rate even during regular 'summer storms' - a hurricane will be catastrophic for us. The plan needs to take into account adjusted annual rainfall factors in 2025 which increased by about 18% since Atlas 14 data. We need a comprehensive Flood mitigation plan that looks towards the future, instead of looking backwards and only meeting minimum standards based on outdated projections. Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentFlooding and infrastructure must be a priority.
Iliveinapark@gmail.com	2/24/2025 17:37		Looking at the contributors to the plan, it appears as though professionals with expertise related to specific sections of the plan, such as natural and water resources, were not consulted. We recommend asking professionals in the NJDEP with expertise in the fields of forestry and wildlife to review and revise these sections prior to the document being finalized so as to ensure the statements in this plan align with and reference the goals and actions in the Forest Action Plan and Wildlife Action Plan. Yes2050 Statewide Planning Goals, Strategies, and PrioritiesSpecific comment related to a specific goalNatural and Water ResourcesPage 43, last paragraph, 1st sentence - the sustainable use of wood for construction does not reduce the amount of forest in the landscape, and also does not permanently reduce tree cover like farming, mining, and urbanization does. Please remove "the use of wood for construction" from the sentence. Page 44, 3rd full paragraph, 2nd sentence - the impacts of forestry activities on steep slopes are not the same as forestry activities that use the forestry and wetland best management practices. Please remove "forestry activities" from the sentence of clarify it as "forestry activities outside of an approved plan" Page 47, 2nd full paragraph, 2nd sentence - Please add "from development" at the end of the sentence. Forest disturbances to remove woody vegetation or create canopy gaps is necessary in wetlands to help maintain the wetland and create wildlife habitatSpecific section of the Preliminary State Development and Redevelopment PlanThe State Plan Policy MapSpecific comment related to a specific Map SubsectionCritical Environmental Sites (CES) & Historical and Cultural Sites (HCS)Page 75, Under Guiding Criteria please change the prime forested areas to "prime forest areas, including young and mature stands of native plant species". Young (regenerating) forests should be included because they are extremely scarce in NJ, incredibly important for carbon sequestration and biodiversity, a

druckenbrod@hotmail.com	2/24/2025 15:44		The State Plan must, in the strongest terms possible, discourage urban and suburban sprawl and focus on strengthening main streets, downtowns, and promoting transit-oriented development.
			The best place to build housing and jobs is in already dense, walkable urban and rural town centers. It is the only way to balance creating enough affordable housing while meeting climate and health goals. Additional development must be discouraged on State and US highways.
			The current planning and development practices within the State have lead to unsustainable infrastructure costs, increased traffic, dangerous streets, and as I'm sure you already know, many other negative effects on health, quality of life, affordability, and the environment.
			Please make New Jersey a leader in better planning and development.No
stateplan.comments@sos.n i.gov	2/24/2025	RE: Inquiry About Public Meeting for State Development and Redevelopment Plan in	Hi Sanjana,
1501		Camden County	The details for Camden County's meeting can be found here: https://www.nj.gov/state/bac/planning/documents/update-to-state- plan/SPC%20LEGAL%20AD%20PUBLIC%20NOTICE%20MAR-APR%202025.pdf
			Please let me know if you have any further questions.
Jacqueline.Rivera@sos.nj.g ov		FW: State Plan Policy map	Is this the current or proposed?
<stateplan.comments@sos. nj.gov></stateplan.comments@sos. 	2/24/2025	[EXTERNAL] RE: State Plan Policy map	Hi Mara,
nigot.			The State Plan Policy map can be viewed in 2 places currently: - Illihttps://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=f bb0c0a8c7ce4a31b05d123426c4a79a — this link will take you to an interactive platform - Illihttps://www.nj.gov/state/bac/planning/library/StatePlanMarch2024_website.jpg - this link will take you to a static jpeg version of the map.
			Can you let me know which link you used that asked for a password?
MWuebker@chnj.gov	2/24/2025	[EXTERNAL] RE: State Plan Policy map	.Hi- I'm trying to review the State Plan Policy Map – it was asking for a password so I entered a password and it says my response was submitted successfully, but I didn't submit any response. I just wanted to view the policy map.Mara W. Wuebker, PP, AICP Community Development Deputy Director Cherry Hill Township820 Mercer Street Cherry Hill, NJ 08002 Office: (856) 432-8708 MWuebker@chnj.govCherry Hill Township provides a secure environment for all information concerning our residents and all other business concerns. The information contained in this email is intended only for the individual(s) addressed in the message and may contain privileged and/or confidential information that is exempt from disclosure under applicable law. Cherry Hill Township provides a secure environment for all information concerning our residents and all other business concerns. The information contained in this email is intended only for the individual(s) addressed in the message and may contain privileged and/or confidential information that is exempt from disclosure under applicable law.
cwilson@sourland.org	2/22/2025	[EXTERNAL] Comment on the Draft State	Last night (Feb. 20, 2025) I attended a public meeting in Somerville (Somerset County) to comment on the draft of
Sanjana Arunchalam@cam	2/21/2025	Plan [EXTERNAL] Inquiry About Public Meeting	the new plan.I was asked to submit my comments in writing, and I am doing so now.I currently serve as the president of the Board of Trustees of the Sourland Conservancy, a nonprofit organization dedicated to the protection, promotion, and preservation of the unique character of the Sourland Mountain region — a refuge of natural and cultural diversity in Central New Jersey. I have been involved with this organization for more than 20 years.I recall that in 2008/2009, the State began (but did not complete) an update to the State Plan; the process reached the point of public comment, but when a new governor took office in 2010, it was aborted.I hope the current effort is completed before we have another new governor, who may or may not support the state planning process. When I read the draft of the new plan, I was frankly disappointed that the Sourlands were not listed as an Area of Critical State Concern.Being listed as an area that should be considered for this designation in the future was small comfort because the Sourlands are a critical and very fragile resource of statewide importance facing unprecedented challenges. If ever such a designation were called for, this is such a case. The 90-square-mile Sourland region is home to the largest contiguous forest in Central Jersey. It encompasses a complex ecosystem of forest, wetlands and grasslands. Its mosaic of habitats is home to an incredibly rich diversity of animal and plant species, many rare or endangered. When I read the list of goals of the new state plan, I am struck by the importance of the Sourlands in meeting these goals: Climate Change—The Sourland Forest is the most intensive carbon sink in the state. While larger forests in North and South Jersey absorb more carbon in total, the relatively small Sourland Forest is shouldering an outsize burden in Central Jersey. Natural and Water Resources—The Sourland region includes the headwaters for surface waters that provide drinking water to more than 800,000 people, in New Jersey and Pennsylvania. Histor
dennj.gov		for State Development and Redevelopment Plan in Camden County	Redevelopment Plan for Camden County. Could you please provide the date, time, and location of the meeting?Thank you,Sanjana ArunachalamUrban PlannerCamden Redevelopment Agency
tlevitt@historicflemington. com	2/20/2025 20:22		"The State Plan must, in the strongest terms possible, discourage urban and suburban sprawl and focus on strengthening main streets, downtowns, and promoting transit-oriented development.
			The best place to build housing and jobs is in already dense, walkable urban and rural town centers. It is the only way to balance creating enough affordable housing while meeting climate and health goals. Additional development must be discouraged on State and US highways.
			The current planning and development practices within the State have lead to unsustainable infrastructure costs, increased traffic, dangerous streets, and as I'm sure you already know, many other negative effects on health,
			quality of life, affordability, and the environment.

Iliveinapark@gmail.com	2/24/2025 17:36		Looks great but how is this leveraged considering hometown rule and ADU's being generally not zoned for?
statepian.comments@sos.n i_gov	2/19/2025	FW: Employment Trend Data	.Hello,I am curious what data is used on page 21 of the draft Preliminary SDRP in the Employment Trends in New Jersey box, particularly in the last line, which states, "Among the 10 municipalities that gained at least 5,000 jobs between 2010 and 2020 are Princeton, Jersey City, Trenton, Hoboken, and New Brunswick."Best,JustinJustin LeskoPlanning DirectorPlanning DepartmentMunicipality of Princeton400 Witherspoon Street Princeton, NJ 08540jlesko@princetonnj.govp: (609) 924-53660PEN PUBLIC RECORDS ACT NOTICEE-mails exchanged with Princeton officials and/or employees are public records that may be subject to disclosure under the New Jersey Open Public Records Act (OPRA), N.J.SA. 47:1A-1 et seq. Although there are several exceptions to OPRA's disclosure requirements, there should be no expectation that the contents of the e-mails or their attachments will remain private.
jeanpublic1@gmail.com	2/19/2025	[EXTERNAL] Re: i have scanned the plan that has been put forward for nj devlopment in future	On Wed, Feb 19, 2025 at 2:38 PM jean public <jeanpublic1@gmail.com -="" 1950s="" 1960s="" 2="" 3="" a="" act="" advocated="" affordable="" age="" all="" allowed="" am="" an="" and="" any="" appears="" are="" arguments="" as="" at="" atemporary="" away="" be="" bills.="" bringing="" brings="" but="" by="" calculatedas="" california.="" can="" can,="" cannot="" car.="" cars="" change="" changs="" child.natural="" citizenwanteda="" college,="" come="" coming="" comingto="" communities="" community="" company="" comunity="" conserved.infrastructure="" control="" corporations="" corruption="" costs="" counciltomorrow="" crowd.="" days,="" debt="" decent.="" deficit="" deserves="" destroy,="" did="" disabled="" do="" dollars,="" dollars.="" done="" dont="" eda="" era,="" etc.="" every="" expected="" f="" failed="" feb="" for="" free="" get="" gets="" giveaway="" giveaways.="" given="" gives="" govt="" govt.="" grade="" growth="" had="" has="" have="" having="" help="" high="" highlands="" home,="" housing="" how="" huge="" i="" if="" in="" intensive="" is="" it="" itself="" jobs="" keep="" knew="" know="" land="" leave="" legislature="" like="" long="" majorit="" make="" manifesto="" many="" me.economic="" meeting.="" member="" minus.housing="" misuses="" must="" my="" nature="" nd="" necessarilyy="" need="" newak="" newark="" nights="" nj="" no="" not="" now.="" of="" old="" older="" on="" operate,="" or="" other="" others.="" our="" out="" overspends,="" parked,="" paterson="" pay="" permanent="" persons="" plan="" plan.="" population.="" populations="" present="" presently="" presenttime.="" program="" program.="" programs="" protected,="" r<="" redevelop="" resident="" responsible="" ruined="" rules="" safe="" school="" seen="" should="" significant.="" since="" so="" socialist="" soon="" spending="" standards="" state="" state.="" stop="" takes="" taking="" tax="" td="" temporarily="" term="" that="" the="" their="" them="" them.="" theout="" these="" they="" this="" time="" to="" unimpressive="" use="" very="" wants="" was="" we="" weekends="" wene="" what="" where="" who="" with="" without="" work="" worked="" would="" wrote:i="" y=""></jeanpublic1@gmail.com>
cm@oootil.com	2/18/2025 10:18		Climate change has been happening from the very beginning, US has been a good Stewart over that. The rest of the world hasn't. What I don't want to see is US citizens continue to sacrifice changes, give up more freedoms, more money when it does absolutely nothing except make some entity's rich. I don't believe or trust, and I'm not alone in this what you're plans are for the folks or our environment. I have not seen any evidence to the changes we spent billions on or have benefited from.No
pwasilius@gmail.com	2/18/2025 8:13		Stop over developing our communities. There will be no open or green space left. I see empty retail space. Empty malls. Not new developments should break ground until existing empty space is redeveloped. No
Icleveland@sourland.org	2/18/2025	[EXTERNAL] Sourland Region ACSC	Dear Members of the State Planning Commission, I write to provide comments on the draft State Development and Redevelopment Plan, dated December 4, 2024. Thank you for recognizing the Sourland Region as an area for potential future designation as an Area of Critical State Concern (ACSC). However, given the urgent challenges facing the Sourlands today—including the Emerald Ash Borer infestation, Beech Leaf Disease, overbrowsing by deer that hinders forest regeneration, invasive plant species, and increasing development pressures—we strongly urge the Commission to act now. The Sourland Region is a vital natural resource for our state. The Watershed Institute estimates that more than 800,000 residents of New Jersey and Pennsylvania rely on the Sourlands for some or all of their drinking water. Designating the Sourlands as an ACSC would formally acknowledge its critical role and potentially unlock additional funding opportunities for forest restoration, while enabling the implementation of more effective deer management policies and conservation initiatives. The Sourland Conservancy has been working closely with nonprofits, municipalities, businesses, and residents to address these environmental challenges. Together, we are restoring the region's ecosystem health to mitigate climate change impacts, reduce flooding, filter air and water, and preserve critical habitat for wildlife—including 57 state-listed threatened and endangered species that depend on the Sourlands for survival. To date, we have planted more than 50,000 trees in the region. Unfortunately, the New Jersey Forest Service estimates that we are losing more than one million trees to the Emerald Ash Borer alone—approximately 20% of the entire forest. Our petition is broadly supported by municipalities, counties, and nonprofit organizations throughout the region. Before the comment period closes, we anticipate securing resolutions or letters of support from most, if not all, of these stakeholders. We will submit a complete list as it becomes available. At
dschley@bernards.org		[EXTERNAL] RE: State Plan Update question	Thank you, Lisa, for the quick response.
Jacqueline.Rivera@sos.nj.g ov	2/13/2025	FW: State Plan Update question	.Good Afternoon, Ms. Rivera,I've been checking out the State Plan Update information posted on the OPA webpages and I haven't seen anything about a draft updated State Plan Policy Map. If one exists, can you point me in the right direction, or if not, is there a timeline as to when a draft might be available, or any other relevant information regarding the map that you could share?Thank you very much,Dave SchleyDavid Schley, PP, AICPTownship PlannerTownship of Bernards277 South Maple AvenueBasking Ridge, NJ 07920(908) 204-3004dschley@bernards.org
fruit_beady_9t@icloud.co m	2/5/2025 19:24		NJ needs a strategic and comprehensive plan. Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentImportance of watershed planning and supporting watershed planning. YesImplementationNJ needs to provide financial support for regional and watershed planning. No

Deborah.Reynolds@raritan twpnj.gov	2/5/2025	[EXTERNAL] Sourland Mountain Region	I.Hello, Please see the attached resolution passed last night by the Raritan Township Committee in support of the Sourland Mountain Region.Best regards, Debbie ReynoldsDeputy ClerkTownship of Raritan(908) -806-6101deborah.reynolds@raritantwpnj.govwww.raritan-township.com 1 Municipal DriveFlemington, NJ 08822Please be advised that any communication to and from the sender of this email may be subject to disclosure pursuant to the New Jersey Open Public Records Act NJ.S.A. 47: 1A-1 et seq. If you are not the intended recipient you are hereby notified that you have received this communication in error and that any review, dissemination, distribution or copying of this transmittal is strictly prohibited.DisclaimerThe information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful. This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.
noreply@brightdata.com	2/4/2025	[EXTERNAL] Personal Information Notice - Bright Data	. PersonalInformationNotice Who We Are Bright Data Ltd., assists vetted businesses in collecting reliable public web data. This notice is to inform you of the collection, processing, and sale of certain personal information or personal data about you ("Personal Data"). Some of the public information collected by us from the internet may occasionally include personal data, even though personal data collection is not our main business or objective. Please see below more information about the Personal Data we collect, how we gather it, and how it is used and shared. What do you need to know? Categories of Personal Information Processed We may have any or all of the following categories of personal information about you, past or current collected from public websites: - Name - Profile picture - Company- Office Address- Telephone Number- Email Address- Job Title- Job Function and Responsibilities- Education- Social Media URLWhat do you need to do? No action is required on your part. If you wish to check which Personal Data we have collected about you from the public web, you can check data collected, where you will find options to keep or request to delete such Personal Data. Recipients of the Personal Data This Personal Data may be shared with Bright Data's customers, its partners, or the customers of its partners. These recipients are business organizations who are permitted to use the information only for lawful purposes and must meet Bright Data's service agreements, as published in https://brightdata.com/license.Some of Bright Data's customers may be located globally, including outside of the European Economic Area. In such cases, Bright Data will employ applicable legal safeguards, aligned with the applicable data protection legislation's requirements. How long will we keep the Personal Data We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, or until you instruct us to refrain from processing it. Purpose of
murphy1008@optonline.n et	2/4/2025	[EXTERNAL] Update to State Development and Redevelopment Plan	Good Afternoon,I am interested in reading the Update to State Development and Redevelopment Plan.To print out the 168 pages would be an undue financial burden.Could you please send me a printed hard copy to my mailing address?John Murphy1008 Tysley PlaceRaritan, NJ 08869
<u>cto@tech.nj.gov</u>	2/3/2025	NJECC 2025 Charity Applications	Invite your favorite charities to be part of the New Jersey Employees Charitable Campaign! Is there a charity you are passionate about that was not listed as an option this year? Now's your chance to make a difference! Between February 3rd and March 3rd, 2025, the New Jersey Employees Charitable Campaign is accepting charity applications for the upcoming 2025 campaign! This is your moment to shine a spotlight on a cause you care about and help them gain the recognition and support they deserve. Don't wait – click here for the details on how charities can apply!https://njecc.net/charity-applications/For any additional questions, feel free to reach out to the New Jersey Employees Charitable Campaign Manager Susan O'Brien at sobrien@njecc.netLet's get the charities that matter to you the chance to join us in making a positive impact!CONFIDENTIALITY NOTICE: This email message and all attachments transmitted with it may contain State of New Jersey legally privileged and confidential information intended solely for the use of the addressee only. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachment is prohibited. If you have received this message in error, please notify the sender immediately and delete this message.
cory.phillips@kaybergroup.	2/3/2025	[EXTERNAL] State plan question	.Test
com jeanpublic1@gmail.com	2/1/2025 15:17		No
Jeanpuolic1@gmail.com jlesko@princetonnj.gov	1/28/2025	[EXTERNAL] Employment Trend Data	.Hello,I am curious what data is used on page 21 of the draft Preliminary SDRP in the Employment Trends in New Jersey box, particularly in the last line, which states, "Among the 10 municipalities that gained at least 5,000 jobs between 2010 and 2020 are Princeton, Jersey City, Trenton, Hoboken, and New Brunswick." Best, JustinJustin LeskoPlanning DirectorPlanning DepartmentMunicipality of Princeton400 Witherspoon Street Princeton, NJ 08540jlesko@princetonnj.govp: (609) 924-53660PEN PUBLIC RECORDS ACT NOTICEE-mails exchanged with Princeton officials and/or employees are public records that may be subject to disclosure under the New Jersey Open Public Records Act (OPRA), N.J.SA. 47:1A-1 et seq. Although there are several exceptions to OPRA's disclosure requirements, there should be no expectation that the contents of the e-mails or their attachments will remain private.
	1/22/2025 12:52		2050 Statewide Planning Goals, Strategies, and PrioritiesSpecific comment related to a specific goalNatural and Water ResourcesHello, I would like to see our state restore the existing parks and infrastructure to their original purpose. For example, Ringwood State Park is deteriorating in front of our eyes. Shepherd Lake once had concessions, running toilets and a place to swim. That's all gone now. If we are to achieve climate goals in the future, it is important that urban families have a safe and convenient way to enjoy the outdoors. The facilities are there, they just need to be staffed and patrolled for more of our citizens to enjoy New Jersey's woodland bounty. This is not only an environmental issue, it is quickly becoming an equity issue. Those without the funds to join private clubs in the countryside are losing options on where they can affordably recreate in our forests. Please fund these parks so they can, once again, be enjoyed by ALL residents of New Jersey.

	. / /	and a second
czamarra@bernardsville.go v	1/21/2025 18:00	Hi there, As a farmer, I support protecting our ecosystems to the maximum extent possible, preserving wildlife habitat, and minimizing any new development. We should focus on infill, i.e. building additional housing (if needed) in already developed areas (like cities) and should minimize urban sprawl. Please let's protect our state's last remaining wild places. I appreciate your efforts!!No
rosemaryagrista1@gmail.c	1/15/2025 16:20	Thank you for this opportunity. I have noticed here in Atlantic County developers for example like DR Horton, clear cutting land for obscene development (Tides of Ocean) Wescoat Rd egg harbor twp: the quality of life and possibility of flooding, not to mention traffic congestion will be vast. Plus, there's already a smell there(bay or dump) is there a way to scrutinize a developers plans so that houses can be built, trees and land used more environmentally friendly for, not the homebuyers but the community? If you look at the plans there is no consideration for community: meaning open space to play ball, snow removal, trash removal etc. the streets are tight and houses will be packed in with only wescoat rd for access. The County needs open places for children, people, families to frolic. For example "imagination Station" a lovely Atlantic County park in Galloway last year closed the walking path around the man made lake. Next time out there, they had clear cut the trees, no one from the Parks responded to my inquiry. It appears the man made lake did not drain properly? So acres of trees removed? Please maintain our County and State parks with care of the flora and fauna, as well as wild life. There are many State parks and County parks. Are there enough park rangers to monitor for poachers, keep the areas safe and clean? I know there's forestry and park services personnel. But are there enough and are there ways to upkeep without clear cutting and destroying? I'd also like to recommend that all community police and sheriffs dept while out, especially in the evenings note street lights out and report them. Route 322 /40 and Route 30 in Atlantic county has many, many lights out. There are large stretches of roads that pedestrians use that are unlighted:no lights at all. People literally walk in the dark. Atlantic is number 1 in the State for traffic fatalities. Many are pedestrians. Please find a way to remedy this issue. As many of us have individuals who walk to get home from bus stops after school and from NJ
ephillips@co.somerset.nj.u s	1/14/2025 11:23	On Earth Day this past year I attended the ACUA Earth Day Event We visited the sewage treatment plant and windmills in Atlantic City. I had no idea what they did there and that it must be watched 24/7. Our guide shared with us very interesting information and how after treatment the waste water is pumped out 10 miles I think? I asked him about hurricanes, flooding, hurricane Sandy. He said they had to stay even during evacuations because what could have happened would have been catastrophic for sewage and wate water management. If you would please see what can be done to enhance our sewage station and for that matter the dump as I believe it's full and our recycling facilities. YesimplementationMy hope is that the state will help Hamilton Twp and Atlantic County preserve our trees and grounds. Help to over come climate control with dunes and grasses on the shore. And help figure out a way to help the homeless and veterans. And offer State jobs here for us to work and make a decent wage. No
ephillips@co.somerset.nj.u s	1/14/2025 11:19	I sent a comment later stating Atlantic County was the county with highest traffic fatalities: we are actually 2nd in the state. We need street lights and sidewalks here for pedestrians and commuters. There are stretches of route 322 / 40 as well as Route 30; that are very poorly lit. And there are street lights out we're there are some. I report the outages to Atlantic City Electric. I asked coworkers and friends do the notice street lights out, many said no because they try not to drive at night. Others said no, they figured someone else reported it or had never thought of it. For safety sake residents and law enforcement that are out and about in the evenings need to be made aware of ware outages can be reported. Some don't care, which is an issue. Thank youNo
dentagoodman1@aol.com	1/13/2025 6:38	Please remember that all towns in New Jersey are not the same. The smallest towns have become so densely populated by building structures larger than it can hold. Traffic is an absolute nightmare. It has become so difficult for Pedestrian to walk across a simple county road without the fear of getting hit. Traffic patters are a nightmare and street parking has become ridiculous to navigate. Pause, take a moment to think about the people in your communities and not how you can increase your budgets by a 1.5%
araceengineering@aol.com	1/12/2025 19:47	In reading the Cross Acceptance Manual, I do not find it relatable to the Salem County area. The references seem to apply to northern New Jersey. I am looking forward to working with this group to accomplish a more standardized state plan. No
Ikratina@msn.com;	1/12/2025	Good afternoon, Are any text documents and "delta" map resources that illustrate and describe the location and magnitude of proposed changes to the Planning Areas, Centers, CES and other SPPM features available for review by the public? If yes, please provide a link. Also, can a roadway layer with labels be added to the online Preliminary State Plan Map viewer? Thank you for the opportunity to review the preliminary plan. Ilook forward to hearing from you. Sincerely, Laurette Kratina
info@downtownnetwork.n et	12/30/2024 19:37	we need to go much slower on development/redevelopment in nj.our open space is being destroyed, our forests are being logged, i.e sparta mt, the developers have all thes way and input in trenton. It hink here in nj is being taken away by govt through terrible inflation and taxation. It hink having planners who are older and have a history of what nj used to look like should be hired. It hink these youngsters who dont have any history of the open land that used to be in nj and how much better such living conditionis are where people can live in peace. placing people on top of each other in fact brings about dissention and violence. saving open space needs highest priority imoNo

Jacqueline.Rivera@sos.nj.g	12/27/2024	State Plan Question from Morris County	Page 65 of the Preliminary State Plan "Use the RMP Land Use Capability Map as the State Plan map for the
ov;		,	Highlands Region"
			Please confirm that, instead of reviewing Preliminary State Plan Planning Areas (boundaries/criteria/intent),
			counties and municipalities reviewing the "State Plan Map" should not be reviewing State Plan Planning Areas, but should instead be reviewing Highlands RMP Land Use Capability Map Zones to identify areas of consistency with
			the Highlands RMP and that this applies to the entire Highlands Region, not just to Preservation or conforming
			Planning area municipalities.
			Please confirm and/or let me know what the intent is here, thank you.
			Autor Colors
			Anthony Soriano Supervising Planner
			Morris County Office of Planning and Preservation
			(973) 829-8120
Donna.Rendeiro@sos.nj.go	12/24/2024	Fw: State Plan PA definition comment	Hello Donna and Walter –
Ā			
			I have a comment about the State Plan that has been concerning me ever since I read the State Plan in 2001. I feel that the density used to define the Planning Areas is not quite accurate.
			and the density used to define the Fidining Freds is not quite decarde.
			PA1 is described as an area with a density of more than 1,000 people per square mile. A moderate urban density of
			15 dwelling units an acre would create 9,750 dwelling units per square mile. If the average household is 2.25
			people, that would translate to 21,938 people per square mile. Really, the PA1 area should be an area of at least
			10,000 people per square mile. Admittedly, this may be captured by the requirement that PA1 areas have a population of not less than 25,000 people.
			роринатоп от постеѕѕ тып 25,000 реоріе.
			Similarly, PA2 is described as an area with a density of less than 1,000 people per square mile. If we want transit
			infrastructure to be successful in a PA2 area, the density should be approximately 8 dwelling units per acre. This
			would translate to 5,200 units and 11,700 people per square mile. The PA2 definition should be a density greater
			than 5,000 people per square mile.
			Lam also conserved about the density for DAA and DAE. Both of these are defined as having population density of
			I am also concerned about the density for PA4 and PA5. Both of these are defined as having population density of less than 1,000 people per square mile and a land area of greater than one square mile. With the prevalence of
			rural areas having lot sizes greater than 5 acres, the population density of a rural area would be closer to 130
			dwelling units per square mile and a population density of almost 300 per square mile. It could be appropriate to
			define these areas as having a population density as less than 500 people per square mile, or maybe even less than
			250 people per square mile.
			I will admit, I have not finished reading the draft State Plan. What I have read so far suggests that these density
			definitions are what are meant, but not said.
			Thanks for your hard work!
Darlene.Green@collierseng	12/11/2024	[EXTERNAL] Question - Preliminary State	Good afternoon,
<u>.com</u>		Plan	Correspondence issued by the State in January indicated the Preliminary Plan would be published on or about April
			8. Please advise when the Preliminary Plan will be published. Thank you.
			Darlene A. Green, PP, AICP
			Project Manager
			Senior Associate
			darlene.green@collierseng.com
			Direct: 908 200 2801 Cell: 732 284 7684 Main: 877 627 3772 Shelbourne at Hunterdon 53 Frontage Road Suite 110 Hampton, New Jersey 08827
			Shelbourne at Hamerdon 33 Homage Road State 110 Hampton, New Sersey 66627
			colliersengineering.com affiliated authorized entities
			DISCLAIMER This e-mail is confidential. It may also be legally privileged. If you are not the addressee you may not
			copy, forward, disclose or use any part of this email text or attachments. If you have received this message in error, please delete it and all copies from your system and notify the sender immediately by return e-mail. Internet
			communications cannot be guaranteed to be timely, secure, error or virus free. The sender does not accept liability
			for any errors or omissions. Any drawings, sketches, images, or data are to be understood as copyright protected.
	12/10/2024 11:15	1	The Sourland mountain region is one of the most ecologically vital and culturally rich landscape that is under threat from your decisions. By keeping this irreplaceable landscape out of the Area of Critical State concern, this
			from your decisions. By keeping this irreplaceable landscape out of the Area of Critical State concern, this mountain range that supports both bird, wildlife and native plantings will deteriorate without funding. The loss of
			over a million Ash trees alone need replenishment. Besides the tree loss, the designated Continental important
Í			bird area in Central Jersey will diminish its importance without more trees.
			How could this happen?
			· · ·
			I urge you to reconsider adding this to the state development and redevelopment plan. Yes 2050 Statewide
			l urge you to reconsider adding this to the state development and redevelopment plan.Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentl urge you to put the Sourland mountain region on the
			I urge you to reconsider adding this to the state development and redevelopment plan.Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentI urge you to put the Sourland mountain region on the state development redevelopment plan. Redevelopment of this area with new plantings to mitigate the loss of our
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	12/9/2024 9:36		I urge you to reconsider adding this to the state development and redevelopment plan.Yes2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral commentI urge you to put the Sourland mountain region on the state development redevelopment plan. Redevelopment of this area with new plantings to mitigate the loss of our emerald ash borer taking down ash trees is needed. Since this mountain range is One of only 113 designated Continental in bird areas, replacing trees and eliminating additional invasive species can only add to the tourists that would come and visit us. When creating plans that impact where people live, work, and play, public health should have a voice at the table.
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	12/9/2024 9:36		I urge you to reconsider adding this to the state development and redevelopment plan. Yes 2050 Statewide Planning Goals, Strategies, and PrioritiesGeneral comment I urge you to put the Sourland mountain region on the state development redevelopment plan. Redevelopment of this area with new plantings to mitigate the loss of our emerald ash borer taking down ash trees is needed. Since this mountain range is One of only 113 designated Continental in bird areas, replacing trees and eliminating additional invasive species can only add to the tourists that would come and visit us. When creating plans that impact where people live, work, and play, public health should have a voice at the table. Our goal is to care for groups of people, we spend every day in our communities engaging with people and the infrastructures that keep them alive, healthy and productive. We have a valuable perspective to share to guide

sbristol@thewatershed.org	12/9/2024	[EXTERNAL] State Plan Draft	Good Morning
<u>;</u>			Congratulations on getting the draft plan up on your website!
			I have two questions:
			1. Who is taking the cross acceptance lead at Somerset Co. (since Watler Lane is now in your office)?
			2. In addition to the municipal/county cross acceptance for governmental agencies, is there a venue or process
			that you recommend for other organizations to provide input?
			Thank you.
			Susan
			Susan P. Bristol, AICP, AIA Emeritus, LEED AP
			Municipal Policy Specialist
			The Watershed Institute
			31 Titus Mill Road, Pennington, New Jersey 08534
			www.thewatershed.org 609.737.3735 x52
dhamlet@cityofsummit.org	12/6/2024	[EXTERNAL] Members of local government	Hello
ż			I was wondering if you are still looking for municipal government members to be a part of the state planning
			committee. I see there are two open spots. I am currently a governing body member in Summit NJ and also serve
			on the planning board. I am keenly interested in helping on the board.
			Please let me know if there might be an opportunity to apply.
			Thank you
			Delia Hamlet
Victor.Furmanec@co.mon	12/6/2024	[EXTERNAL] State Plan Policy Map	Good morning.
mouth.nj.us;			
			In skimming through the plan I can't find the policy map, or a link to the map.
			I'm assuming there is one.
			Please let me know when it will be available.
			Trease let the know when it will be available.
			Victor
			VICCO
			No. 10 5 10 10 10 10 10 10 10 10 10 10 10 10 10
			Victor Furmanec, P.P., A.I.C.P.
			Supervising Planner
			Monmouth County Division of Planning
			1 E. Main Street
			Hall of Records Annex, 2nd Floor
			Freehold, New Jersey 07728
			(732) 431-7460 x.7467
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Date: August 26, 2025

To: Kamal Saleh, Director of the Bureau of Planning and Land Use

County of Union, New Jersey

From: Victor Vinegra, PE, PP, PLS

Re: City of Elizabeth Submission for the Union County Cross Acceptance Response Template

Dear Mr. Saleh,

It has been brought to our attention that there was a submission made on the city of Elizabeth's behalf for Union County's Cross Acceptance Response Template (CART) for the ongoing State Plan process. However, this document was not reviewed and authorized by the city of Elizabeth before submission, and it does not accurately represent the status of planning in the city. The information from this document was then included in the Union County CART for the Negotiating Phase between Union County's Negotiating Entity and the State Planning Commission's Negotiating Committee.

The purpose of the CART is to analyze Elizabeth's respective planning documents and assess how Elizabeth's vision for New Jersey's future aligns with that of the Office of Planning Advocacy, the creators of the State Plan. From the analysis, we were to review the Preliminary State Plan Draft that was released on December 6, 2024, and then note any disagreements that could be incorporated into the next draft in late 2025. While we understand that the municipal deadline to submit a CART for Union County came in early May, we want to formally submit a more comprehensive review for the assignment.

We also understand that any disagreements or notes that we have may be submitted to the State Planning Commission during the public commenting phase upon the release of the draft Final State Plan later this year. Upon the release of the Final Draft of the State Plan, there will be six (6) public meetings to gather additional feedback for potential incorporation into the plan. After the last public meeting, there is a thirty (30) day commenting period in which municipalities and counties may provide additional feedback to the State Planning Commission. After that commenting period, the State Planning Commission then has an additional thirty (30) days to adopt the Final State Plan.

Overall, we are formally requesting that this more accurate and thorough document replace the current version in the Union County CART.

Attached is the link to the Preliminary State Plan Draft, which was released to the public on December 6, 2024, and approved by the State Planning Commission on December 4, 2024: Preliminary State Plan PDF



Section 1: Consistency with The Preliminary State Plan. If a municipality or regional entity obtained Plan Endorsement that has not expired, this section does not need to be completed.

1. Indicate which documents the municipality or county has and the dates of adoption:

- 1. Most recent adopted Master Plan and any draft elements currently being considered
 - 0 2005
- 2. Master Plan Reexamination Report(s)
 - 0 2008, 2015, 2016, 2020
- 3. Official Map pursuant to N.J.S.A. 55D-32
 - 0 2007
- 4. Land use map Zoning Ordinance and other land development standards
 - Harbor Consultants is currently working on an updated Land Use Element for the city of Elizabeth
- 5. Zoning map and schedule
 - 0 2022
- 6. Approved Housing Element and Fair Share Plans
 - Pending
- 7. Natural Resource Inventory Recreation and Open Space Inventory (ROSI)
 - Obtained by NJ Department of Environmental Protection on Aug 15, 2025: https://dep.nj.gov/otpla/rosi/
- 8. Redevelopment and/or rehabilitation plan(s) adopted pursuant to the Local Redevelopment and Housing Law (LRHL)
 - Kapkowski Road Redevelopment Plan
 - Elizabethport Waterfront Redevelopment Plan (39-55 Pine St)
 - Midtown Redevelopment Plan
 - Seaport Industrial Center Redevelopment Plan
 - Elizabethport Phase II Redevelopment Plan
 - Elizabethport Redevelopment Plan
 - Trumbull Street Redevelopment Plan
 - South Front Street (Borne Chemical) Redevelopment Plan
 - Baker Center Redevelopment Plan
 - York Street Redevelopment Plan
 - Oakwood Plaza Redevelopment Plan
 - Morris Avenue (University Corridor) Redevelopment Plan
 - Henry Street Redevelopment Plan
 - South Second Street Redevelopment Plan
 - Amended East Broad St Redevelopment Plan



- 56-78 Murray Street Redevelopment Plan
- Former Elizabeth General Hospital Redevelopment Plan
- Magnolia Avenue Redevelopment Plan
- 125 Broad Street (Hersh Tower) Redevelopment Plan
- North Ave East/Spring Street/Woodruff Lane
- 61-99 West Grand Street Redevelopment Plan
- Bank Street and New Point Road Redevelopment Plan
- 581-599 Pennsylvania Avenue Redevelopment Plan
- 23-33 South Spring Street Redevelopment Plan
- 5-61 Bay Avenue Redevelopment Plan
- 823-827 East Jersey Street Redevelopment Plan
- Butler Street/Elizabeth Avenue Redevelopment Plan
- 9. Resource protection ordinances
 - 2021 Ordinance 5426-An Ordinance to Repeal and Replace Chapter 13.24 of the Code of the City of Elizabeth Entitled "Stormwater Management" to Reflect Amendments to the New Jersey Stormwater Management Rules
- 10. Farmland Preservation/Agricultural Retention Plan
 - Not applicable
- 11. Any other adopted planning documents (e.g. Stormwater Management Plan, Wastewater Management Plan, Capital Improvement Plan)
 - City of Elizabeth Stormwater Pollution Protection Plan, 2018
 - City of Elizabeth Municipal Stormwater Management Plan, 2018
- 2. Review the ten goals in The Preliminary State Plan and indicate the degree to which municipal and county plans have incorporated key concepts and policy objectives.

The ten goals in the Preliminary State Plan dated December 6, 2024, are:

- 1. **Economic Development:** Promote Economic Growth that Benefits all Residents of New Jersey.
- 2. **Housing:** Provide an Adequate Supply of Housing for Residents of All Ages and Incomes in Communities of Their Choosing That Meet Their Needs and Offer Ready Access to the Full Range of Supportive Goods and Services.
- 3. Infrastructure: Economic Opportunity Through Nation Leading Infrastructure.
- 4. **Revitalization and Recentering:** Revitalize and Recenter the State's Underutilized Developed Areas
- 5. Climate Change: Effectively Address the Adverse Impacts of Global Climate Change.



- 6. **Natural and Water Resources:** Protect, Maintain, and Restore the State's Natural and Water Resources and Ecosystems.
- 7. **Pollution and Environmental Clean-Up:** Protect the Environment, Prevent and Clean Up Pollution.
- 8. **Historic and Scenic Resources:** Protect, Enhance, and Improve Access to Areas with Exceptional Archeological, Historic, Cultural, Scenic, Open Space, and Recreational Value.
- 9. **Equity:** Implement Equitable Planning Practices to Promote Thriving Communities for all New Jerseyans.
- 10. **2024 Comprehensive Planning Goal:** Foster Sound and Integrated Planning and Implementation at all Levels Statewide.

After a comprehensive review of the necessary planning documents, Elizabeth has generally implemented the ten goals of the State Plan within its municipal planning. Through its extensive ordinances, master plan re-examinations, and re-development plans, Elizabeth proves itself to be a city that is constantly evolving to implement the soundest planning principles possible, ensuring a prosperous future for the city that also aligns with the state's vision for the next decade of urban planning. On top of that, Elizabeth is well-known in New Jersey for its rich history and diversity of cultures of residents who are attracted to the city for its economic, housing, and cultural opportunities. Lastly, Elizabeth's Sustainable Jersey Bronze recognition reflects the city's desires to implement sustainability into their local planning, strongly emphasizing local resilience due to Elizabeth's waterfront location.

- 3. If inconsistent how will the municipality or county become more aligned with the State goals and how will this be achieved? What is the predicted timeframe for greater consistency? Elizabeth is generally consistent with the goals of the State Plan.
- 4. How well do the designated State Planning Areas suit the current and future development of your municipality and/or county? Elizabeth is located within Planning Area 1-Metropolitan Planning Area. This means that the land is almost entirely built out, and it is anticipated that the majority of future development in the city would most likely come in the form of redevelopment and revitalization. This planning area assignment accurately reflects the build-out of Elizabeth, and the city currently has redevelopment plans in progress of implementation to enhance the future development of the city.

Per the State Plan Preliminary Draft, below is the definition and guidelines for PA1:

METROPOLITAN PLANNING AREA (PA1)

Intent



The State Plan's intent for the Metropolitan Planning Area is to: provide for much of the state's future growth in compact development and redevelopment; revitalize cities, towns and neighborhoods, and in particular overburdened neighborhoods; address existing legacy issues such as air pollution, urban heat islands, lead contamination, Brownfields, urban highways, and combined sewer systems; prevent displacement and gentrification; promote growth that occurs in Centers, other appropriate areas that are pedestrian friendly, and in compact transit-oriented forms; rebalance urbanization with natural systems; promote increased biodiversity and habitat restoration; stabilize and enhance older inner ring suburbs; redesign and revitalize auto oriented areas; protect and enhance the character of existing stable communities.

Guiding Criteria

The following criteria are intended as a general guide for delineating locations as a Metropolitan Planning Area. Local conditions may require flexible application of these criteria to achieve the Policy Objectives of this Planning Area:

- 1. Density of more than 1,000 people per square mile.
- 2. Existing public water and sewer systems, or physical accessibility to those systems, and access to public transit systems.
- 3. Land Area greater than one (1) square mile.
- 4. A population of not less than 25,000 people

Section 2: Agreements and Disagreements with The Preliminary State Plan

- 1. Provide a detailed discussion of any issues or recommendations to The Preliminary State Plan in order to better meet local needs. Elizabeth would recommend more focus on the lack of parking in urban areas in the state, as this has been a concern that residents have consistently been bringing up to local officials. Especially in waterfront communities such as Elizabeth, adequate parking outside of a flood-zone is increasingly difficult to find, which ends up being a source of stress for residents. Despite Elizabeth's urban geography, there is not adequate transportation infrastructure to replace the need for a car, and many residents are still relying on private vehicles to go from place to place. As density and population continue to grow for Elizabeth, so will the demand for enough parking spaces.
- 2. Provide a detailed explanation of how municipal and county plans will be modified in order to create a greater degree of consistency. Elizabeth is generally consistent with the ten goals of the State Plan.
- 3. Provide comments and recommendations regarding State agency implementation of the State Plan including any applicable agency or program, as well as make recommendations



as to possible revisions to those plans or programs that would enhance State Plan implementation at all levels of government. The city of Elizabeth would encourage more collaboration between the state and local level planning in implementing resilience efforts to strengthen waterfront communities' response to the increasing risks of climate change and its flooding impacts on the state. Especially since the main economic drivers of Elizabeth and New Jersey overall (the port, the airport, and Jersey Gardens) are located within FEMA flood zones, as much state assistance to protect these economic assets as well as vulnerable waterfront communities will be needed.

- 4. Submit a Negotiating Agenda, which will form the basis of the negotiation sessions between the Negotiating Entity and the SPC. The agenda should state the issues being presented, proposed alternatives and provide direct citations of pertinent State Plan provisions wherever possible. OPA will then schedule meetings with the Negotiating Entity to work through the agreements and disagreements. Representatives of the City of Elizabeth are available to attend meetings with the County and State to discuss the comments in this County Cross Acceptance Response Template.
- 5. Identify areas to be protected and Plans where sprawl (low density auto-dependent development) has occurred and should be limited or prevented from further sprawl. Identify vulnerable areas where there is flooding or other environmental concerns and what could be done to protect them. According to DEP mapping, including NFHL Flood Hazard Zones, land in primarily Ward 1, including along the Elizabeth River and the Newark Bay, fall under FEMA 1% and 0.2% Annual Flooding zones. Some critical assets in these floodplains are the Port of Newark and Elizabeth, and the Newark Liberty International Airport. Elizabeth will continue to work on increasing resilience in the city through efforts such as seeking state-funded grants, implementing local mitigation efforts, and collaborating with agencies such as the NJ DEP and Port Authority.
- **6. Does the municipality and/or county have an open space plan? Open space tax?** Union County has a Parks Master Plan from 2010
- 7. Is the municipality a member of Sustainable Jersey? If not, what are the reasons for not participating? Does the municipality have other environmental groups, such as an Environmental Commission or a Green Team? The City of Elizabeth received a Bronze Certification from Sustainable Jersey on October 5, 2022. The city received 240 total points from the implementation of several climate and resilience efforts such as community gardens, Safe Routes to School, emergency communications planning, and farmers markets.
- 8. Please indicate your community's three most important local and regional land use planning goals and priorities:
- 1. Provide a greater amount of passive and active recreation and open space to support the increasing residential density in the city.



- 2. Continued redevelopment efforts of Elizabeth's Midtown with extensions of mass transit systems to reduce the dependency on the automobile as the primary source of transportation.
- 3. Implementing the most effective and environmentally sustainable measures to help prevent flooding and build the resilience of Elizabeth, prioritizing the waterfront.
- 4. Address the overcrowded on-street parking conditions that adversely impact our denser residential communities.

Additional Comments:

We kindly ask that Kamal Saleh review the inventory of Elizabeth's planning documents at the County of Union to ensure that the county's collection is up to date and aligned with the city's collection to ensure that both actors are on the same page.

Borough of Gibbsboro

State Plan Modifications

SEWER SERVICE AREAS

PA-5



UNITED STATES AVENUE AREA TO BE RESTORED TO SEWER SERVICE

Block 23 Lot 1 - 4.01 acres Block 25 Lot 1 - 4.48 acres Block 42 Lot 5.01 - 69.11 acres



Potential PA-5

Headwaters of the South Branch of the Cooper River

(Add Open Space, Natural Heritage Priority Site in Gibbsboro, Lindenwold and Voorhees to get 1 mile².) This could even extend to Kirkwood Lake.

State Development and Redevelopment Plan Comments submitted by Vera Lazar

Economy

- 1. Regarding the reducing of regulatory activities While it is important not to cause unnecessary delay, it is vital and necessary that a FULL environmental review be conducted. This should NOT be waived or overlooked. It is also important that development projects go through a full public process and not be rushed through for the sake of expediency.
- 2. The state should also be more supportive of Small Businesses. Redevelopment and revitalization projects often force small businesses to shut their doors. Eminent domain should NEVER be used to take private property for a more "profitable" commercial use. Businesses and private property should NEVER be taken for housing either.
- 3. New Jersey is the GARDEN State. And I believe that State should be more supportive of agriculture. Including small farms located in urban areas. Farmland should NEVER be taken for housing or other uses.

Housing

- 1. Affordability is a huge problem in New Jersey. But the answer is not just to build MORE housing, or to make things "easier" for developers and builders. New Jersey's property taxes are the highest in the nation. If steps are not taken to lower property taxes, EXISTING homeowners will not be able to afford to keep their homes. In addition, Homeowners Insurance rates have risen steeply as well. All the State's efforts involve building more housing to meet anticipated FUTURE population needs. Meanwhile the State's existing residents are being neglected. In addition, when property taxes and insurance rates go up, it becomes necessary for building owners to raise rents just to break even. Steps NEED to be taken to address the overall affordability problem.
- 2. Discriminatory practices and policies should absolutely be banned. And there should be equitable access to housing and opportunities in all municipalities and regions of the state. However, I believe that Home Rule needs to be upheld. The State should NOT override local zoning laws.
- 3. I am particularly concerned about the statement "Land preservation should be encouraged but balanced with the need for new housing and infrastructure." New Jersey is already far too OVERDEVELOPED. Preservation of open space, natural areas, and farmland should be top priority.

- 4. Another disturbing statement is "It is essential that the power of municipal land use controls, particularly through inclusionary zoning, must be harnessed to enable the construction industry to contribute to the wide array of housing types and ranges of affordability needed to keep New Jersey strong, vibrant, and competitive." As previously stated, New Jersey is far too OVER developed. The Construction industry needs no further enabling.
- 5. It appears from this plan that the State is planning to enforce new mandates on cities. Requiring municipalities to build more and increase densities will require more infrastructure, services, schools, road repairs etc. All of which will place a greater financial burden on the cities, AND drive property taxes and costs even higher.
- 6. The plan states that "New housing development expands the total amount of property taxes a municipality can collect, enabling greater investment in schools, infrastructure, public services, and other municipal priorities" However in reality it does NOT work this way. The taxes collected from new housing developments do NOT offset the costs incurred. With more housing comes increased need for more services, such as fire and police officers, repairs and new infrastructure to prevent flooding, and new schools for the increase in number of schoolchildren. This is ESPECIALLY true and harmful when PILOTS are used.
- 7. The plan refers to minimizing parking mandates near transit. Parking and traffic is a major problem in many cities and it shouldn't be minimized. Even if people take the bus or train to WORK, they will STILL have at least 1 vehicle for other activities. And so they still need a place to park.

Revitalization

- 1. Vacant and abandoned properties should be restored and returned to productive tax rolls, where applicable. And there should definitely be more money going to clean up Brownfields. However, this statement is very disturbing: "Municipalities should focus on redesigning underutilized areas for private development and investment, such as defunct or underperforming malls, business parks, and struggling commercial corridors." Revitalization efforts often result in eliminating small businesses. I have seen this happen many times. Neither local NOR State government should EVER be allowed to force an existing business to close or move because it's "underperforming" or "underutilized." These designations have destroyed many people's lives and livelihoods.
- 2. There is also mention about local land use policies. Decisions regarding appropriate land use belong in the hands of LOCAL governments and LOCAL Planning and Zoning boards.

3. Statements such as "Allowing conforming development applications to be fast-tracked" are especially disturbing and should be omitted. This will only serve to benefit only the developers and construction industry. It will unfortunately create even more overdevelopment, and a lower quality of life for New Jersey residents.

In fact the whole plan appears to benefit the Construction Industry far more than NJ residents.

Climate change

- 1. Promoting climate action and reducing greenhouse gas emissions is vital. Shifting toward renewable energy is generally a good thing too. However environmental impacts of ALL energy projects should be carefully evaluated. Offshore wind can also have negative impacts on ecosystems and local economies. Solar energy projects can involve cutting down trees and be counterproductive and harmful as well.
- 2. New gas pipelines, compressor stations, and fracking should not be permitted.
- 3. There should be greater emphasis on preservation of existing forests and tree planting to mitigate climate change impacts.

Natural Resources

- 1. New Jersey needs to actively protect, maintain, restore, and enhance the State's natural and water resources. It is vital that our natural areas be preserved. It is especially important for all levels of government, including regional planning agencies, to take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. These Natural Resource Goals are all excellent. Unfortunately the State's housing mandates and other policies and creating the opposite. Instead of preserving what open space is available, towns are being forced to cut down their forests and build on parkland and farmland in order to meet the state mandates. It is especially to protect natural areas that serve overburdened communities. And yet even cities are being forced to develop their remaining open space.
- 2. The plan states that "Capital projects undertaken by public agencies should seek to the extent practicable and commensurate with the project goals to maximize habitat protection, restoration, and connection. Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible." These statements are especially important. However including the words such as "to the extent practicable" and to the "extent that it is feasible" is a loophole and pretty much guarantees that this will not happen.

Farmland

- 1. Farmland should be protected at all costs. The plan states that preserving farmland contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities. All of which is absolutely true. Preserving farms also provide residents with local, fresh produce. But meanwhile, affordable housing calculations are being made that designate forests, parks, open space, AND farmland as VACANT and developable land. Towns are now using eminent domain to take over family farms. Which is totally unacceptable.
- 2. Smaller farms located in more urban areas are especially important and serve overburdened communities. Yet these small farms are especially vulnerable to development pressure. There should be a special designation and incentives for these small farms to remain as FARMLAND.

Air quality

- 1. Air quality in the State is often very bad. Pollution and VOCs released by industries needs to be addressed. No idling laws need to be enforced for utility vehicles and trucks.
- 2. Air Pollution coming from other states needs to be addressed as well.

Water Quality

- 1. It is vital that the cumulative effects of development and redevelopment do not compromise or degrade water quality and supply... The plan states to "Prevent contamination of ground and surface waters, protect and enhance wetlands and forests to improve water quality, control floods, and protect habitats. Protect and preserve wetlands and forests, minimize disturbance." Once again, it is important that these goals are not bypassed to allow for new construction.
- 2. Water quality in many cities is very poor. There needs to be greater effort to eliminate PFAS and other chemical contaminants from the water supply.

Pollution and Environmental Clean-Up

The Ringwood Superfund site should be given TOP priority and cleaned up properly. Toxic chemicals are still leaching into the area's brooks and waterways, exposing nearby residents and making their way to the water supply.

Thank you,

Vera Lazar 22 Spencer Ave. Clifton, NJ 07013

lazarv@aol.com



West Amwell Township 150 Rocktown-Lambertville Road Lambertville, New Jersey 08530-3203 (609) 397-2054 • (609) 397-8634 FAX

www westamwelltwp.org

Resolution #49-2025 Supporting the Designation of the Sourlands as an Area of Critical State Concern

WHEREAS the Sourland Mountain Region, defined by its unique geology, encompasses 90 square miles, spanning parts of seven municipalities including East Amwell, Delaware, Hillsborough, Hopewell, Lambertville, Montgomery and West Amwell, in Mercer, Somerset, and Hunterdon counties as delineated on the Sourland Conservancy map attached; and

WHEREAS the Sourlands, home of the largest contiguous forest in Central New Jersey, are an island of biodiversity in a sea of encroaching sprawl; and

WHEREAS the Sourlands are home to dozens of rare and endangered species of plants and animals, and an irreplaceable stop over for migrating birds; and

WHEREAS the Sourland forest is the most intensive carbon sink anywhere in New Jersey; and

WHEREAS more than 90 miles of streams in the region are "first order" streams, also known as headwater streams, which feed into larger second-order streams. The first order streams are critical headwaters to the Raritan and Millstone Rivers, an important source of drinking water for New Jersey residents; and

WHEREAS the Sourlands are enjoyed and relied on by countless urban and suburban New Jerseyans as a recreational resource; and

WHEREAS the Sourland Mountain Region offers important recreational opportunities for residents and visitors. The Region hosts 26 public preserves with hiking trails including Goat Hill Overlook which is historically and ecologically significant.

WHEREAS the Sourland forest is losing more than a million trees (about a quarter of the forest) to the Emerald Ash Borer, and more to emerging threats; and

WHEREAS natural forest regeneration is impossible in the Sourlands because of the vast overpopulation of white-tailed deer; and

WHEREAS the State of New Jersey is currently updating the State Development and Redevelopment Plan; and

WHEREAS an Area of Critical State Concern is considered a designated geographic area that contains or has a significant impact on environmental or natural resources of regional or statewide importance.

These areas are intended to protect resources and public facilities from uncontrolled development that would cause substantial deterioration of such resources.

WHEREAS designation of the Sourlands as an Area of Critical State Concern (ACSC) in the State Plan would have numerous benefits, including:

- State recognition of the importance of the Sourlands will help with both the public and private preservation of land.
- The ACSC designation will help attract funding for reforestation, education, and conservation efforts in the region from various sources such as federal and state grants, foundations, and individual donors
- The ACSC designation will lay the groundwork for any needed legislation to protect the Sourlands.
- The ACSC designation will help with efforts to bring the deer population under control.
- The ACSC designation will call attention to the need to protect the quantity and quality of surface waters and groundwater of the region.

THEREFORE, be it resolved that West Amwell Township supports the designation of the Sourland Region as an Area of Critical State Concern and urges the State Planning Commission to include this designation in its current update of the State Development and Redevelopment Plan.

By Order of the Township Committee,
Robert Balaam, Jr., Mayor

I hereby certify theforegoing to be a true copy of a Resolution adopted by the West Amwell Township Committee at their meeting on May 21, 2025.

Certification



COMMENTS

Comments on Draft Preliminary State Plan regarding the Sourlands Letter to the State Planning Commission

May 22, 2025

Contact: <u>Chris Sturm</u>, 609-213-4673

16 W. Lafayette St. Trenton, NJ 08608 p: (609) 393-0008 f: (609) 360-8478 w: njfuture.org

Dear Members of the State Planning Commission,

The process of updating the New Jersey State Development and Redevelopment Plan (State Plan) is an important opportunity to recognize the unique ecological, water, geological, and cultural resources of the New Jersey Sourlands by designating the region as an Area of Critical State Concern (ACSC) or a Special Resource Area (SRA).

The Sourland Mountain Region is one of New Jersey's most ecologically significant landscapes, spanning over 90 square miles, three counties, and seven municipalities. It is home to diverse wildlife, serves as a vital carbon sink, and provides clean drinking water for over 800,000 people in New Jersey and Pennsylvania.

Yet, this valuable region is being degraded, especially by fractured and short-sighted land use planning that does not adequately address development pressure. Without immediate action, the state risks losing critical biodiversity, water quality, and climate resilience.

New Jersey Future urges the State Planning Commission to revise the Draft Preliminary State Plan to recognize the Sourlands' valuable attributes by designating it as an ACSC or SRA. This designation would help secure state support for restoration, improve regional coordination for sustainable land management, and advance a more holistic approach to land use planning that can protect the region's natural and cultural resources for residents today and in the future.

On behalf of New Jersey Future, thank you for the opportunity to comment. Please feel free to contact me or my colleagues with any questions.

Sincerely, Chris Sturm Policy Director for Land Use New Jersey Future

05/20/2025

Please consider the following comments and suggested edits/modifications to the draft plan. The Department focused its review to primarily address what we consider "significant" comments, or those where a very simple modification would improve the plan. I am happy to provide more information or answer any questions.

Page	Para.	DEP Comment	DEP Edit (as applicable)
15	6	Considering recent events, and the land use implications, we feel it appropriate to reference wildfire.	"Anticipating and responding to hazardous storms, ravaging floods, oppressive heat, increasing wildfire, and other impacts of climate change"
30		The Infrastructure section does not address drinking water, wastewater, stormwater, or broadband infrastructure. This feels problematic. While drinking water, wastewater, and stormwater are mentioned at various points throughout the document, there is no comprehensive discussion of these infrastructure systems. These infrastructure systems should be included in the Infrastructure Goals section in the same way as transportation and clean energy. Broadband is not considered anywhere in the document but should also be included in the Infrastructure Goals	
		section.	
30	1	Suggest adding language about existing development/infrastructure in vulnerable areas. Also trying to support a PA1B/2B-type planning area.	"State, county, and local governments are encouraged to adopt a climate adaptation framework that deprioritizes additional development and infrastructure investment in physically vulnerable areas, recognizes the development and infrastructure already in vulnerable areas, while facilitating increased development and infrastructure investment in appropriate climate-safe locations. This will place fewer people and investments at risk from climate impacts, address current vulnerabilities, and decrease the need for emergency response and expensive resilience and mitigation infrastructure."

05/20/2025

34	2	Should add water efficiency	"All new buildings in the State should energy <u>and water</u> efficient_and"
39- 40		The Climate Change section's Strategy and Goal clearly suggest limiting development/investment in vulnerable areas, yet I see little/nothing in the Priorities that clearly support it. The language about wildfire and flooding seem to go out of their way to avoid saying that. Suggestions follow.	
40- 41		Changes to Hazard Mitigation - Priorities The actions re: wildfire in this section are focused on forest	"Forest Wildfire management, including fuel load reduction selective clearing, selective prescribed burning, and limiting new development is essential to control wildfire risks in Wildland-Urban Interface (WUI) areas is essential to control wildfire risks"
41	3	management (also, wildfire happens outside forested areas). Consistent with the Strategy and Goals, we should more directly prioritize not extending development into wildland-urban interface areas (i.e. putting them at increased risk from wildfire).	"Reduce wildfire risks through forest-management practices like selective clearing and prescribed burning, so that landowners and municipalities employ best practices in land stewardship. Limit the vulnerability of communities to wildfire by avoiding the extension of homes, businesses, and community assets into Wildland-Urban Interface areas."
41- 42		Coastal Areas and Riverine Corridors – Priorities Looking to add priorities consistent with Strategy/Goal to limit development/investment in vulnerable areas	"Increase awareness of areas and populations vulnerable to impacts of climate change. Where development exists in vulnerable locations, promote resilience measures such as elevating buildings, hardening and floodproofing critical infrastructure, incorporating nature-based solutions, and evaluating managed retreat as a potential solution. Adopt land use policies to avoid new development in vulnerable locations and, where unavoidable, incorporate resilient design standards."

05/20/2025

43	2	The Commissioner of NJDEP is the trustee of the state's natural resources.	"New Jersey and its local governments act as trustees of the state's natural resources, and are tasked with"
			"Allocating and leveraging funds for farmland <u>and open</u> space preservation represents a strategic investment.
43	3	Unclear why the plan would promote funding for farmland preservation only. The GSPT already funds farmland preservation, as well as open space preservation, historic preservation, and Blue Acres.	The State and local communities should protect the long-term viability of the agricultural industry, preserve land to mitigate climate change impacts through carbon sequestration and improved land management practices, and foster local food production to address food insecurity and promote healthy communities. Preserving farmland and open space also contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities."
46	3	The recommendation to "institute a watershed-based resource planning and permitting program" would require significant statutory and regulatory changes. Suggest softening.	"Promote and prioritize program changes that encourage Institute a-watershed-based resource"
46	4	The language used here describes "nature-based" so should just say that.	"Plan for stormwater management and flood control systems on a watershed basis, incorporating where feasible natural systems and non-structural methods nature-based solutions, including increased infiltration."
46- 47		Again, the language used here describes "nature-based" so should just say that.	"Where possible this should be accomplished through natural processes, emphasizing the use of naturally functioning systems and non-structural methods using nature-based solutions."
52	7	SHPO: I am not sure the State should be encouraging "voluntary, speedy documentation of archaeological finds." This conveys a message that we just have to document any archaeology and then we can destroy it. I	

05/20/2025

	am also not sure that this is what the State wants to encourage in light of Tribal interest in projects happening around the State.	
Mult	DEP continues to recommend that floodprone areas should be a consideration for delineating PA3, PA4, PA5. Floodprone areas may not be the sole determinant in delineating these planning areas, but should certainly be considered.	Floodprone areas
74	Shouldn't the description of PA4B have just about the same criteria as PA5, in addition to agricultural uses and soils? Suggest PA4B needs separate description, even if very simple.	
75	The description of PA5B never actually says that Barrier Islands should be PA5B. It's just kind of inferred. Suggest PA5B needs separate description, even if very simple.	
88	Critical Habitat definition is out of date.	Awaiting red-line edit from WLM
76	The CES criteria includes "floodplain" but does not address areas with coastal flooding. Floodplains are generally described (and defined in the plan) as associated with river/streams. Coastal areas that flood are not necessarily "floodplains" and so the use of the term in this circumstance is too limiting.	Floodprone areas
94	"Infill Development or Infill" definition is inconsistent with WQMP regulations. We are unclear if the intent was to align.	
97	"Nature-based" definition is very limiting and only applies to stormwater. Use of "nature-based" in the draft plan goes beyond stormwater. Suggest editing.	"Nature-based means solutions or strategies features that use natural features or vegetation, soil, and processes to manage stormwater, protect, enhance, or restore shorelines, wetlands, in-water resources, and habitat, and address erosion and flooding. Nature-

Commented [NA1]: Plug in WLM language here.

05/20/2025

		based projects may include a combination of biological and structural measures.
Mult	The plan uses both "floodplain" and "flood plain." The latter is incorrect.	

The Preliminary Draft of the New Jersey State Development and Redevelopment Plan

Comments by Loretta Kelly, Research Scientist 1, New Jersey Department of Health
May 9, 2025

Page 27:

Housing Stock Diversity - Priorities

As New Jersey's demographics shift, a greater variety of housing typologies are needed to meet the different housing needs of populations including residents with physical or developmental disabilities, older residents, and low- and moderate-income families. Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs_especially those that align with local character and fit seamlessly into neighborhoods, are needed to make homeownership attainable for low- and moderate-income.

Encourage intergovernmental planning for housing for persons with special needs. When engaging in new development, residents with special needs must be consulted and considered throughout the process, in all development, not only in housing specified for people with special needs

Integrate age-friendly housing into communities. Housing should be accessible for all residents regardless of age. Age-restricted housing should be physically connected to Centers or other areas with facilities and services and include community amenities that promote activity and social interaction.

Increase multi-bedroom rentals for families. In our market, young families and multigenerational households are renting, along with roommates who share units and those who need space to work from home. Without access to two- and three- bedroom apartments (or more) to support all of these needs, couples and young families will be consigned to units that do not meet their needs.

Design equity based affordable housing that fits local character. Affordable housing that fits the local aesthetic and integrates with existing neighborhood structures can foster a stronger sense of community and belonging. When affordable housing is designed to complement the neighborhood, it's less likely to face opposition from residents who might otherwise be concerned about changes to the visual landscape or community character.

Page 28-29

Health and the Environment - Priorities

Whether dealing with new construction or rehabilitation of existing homes, an adequate supply of safe, environmentally-friendly homes is critical to combatting climate change and promoting a healthy living environment.

Commented [LK1]: A nod to the recent NJHOMES initiative sponsored by DCA.

Require residential construction to meet best in class green building standards. Green standards should follow higher standards for environmental quality, such as Enterprise Green Communities, LEED, or Passive House standards. Housing construction should favor the use of energy-efficient, non-toxic, and sustainable building materials, low on embodied carbon.

Rehabilitate aging housing stock to address health and safety concerns. Rehabilitating housing can significantly reduce various health and safety issues. By addressing structural problems, safety hazards, and environmental toxins, rehabilitation can improve indoor air quality, reduce exposure to allergens and irritants, minimize the risk of injuries, and mitigate flood damage. The State, municipalities, and developers should proactively align existing housing with current health, safety, resiliency, and environmental standards. Conversion to electric and zero-emission space and hot water heating systems should occur whenever possible.

Improve in-unit amenities. In inclusionary projects, apartment designs for affordable homes should not differ from those of market-rate homes, and all new housing construction should meet minimum standards for unit size and access to sunlight. The range of required in-unit amenities should be expanded to provide a floor of dignified living, such as access to broadband, green spaces, and climate control.

Combine resources at all government levels to minimize environmental harm. Housing development presents an opportunity to make communities more sustainable through environmentally friendly design features such as water retention basins, pervious surfaces, and solar power. Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance.

Page 29

Housing and Transportation – Priorities

Housing and transportation go hand-in-hand. Promoting access to reliable, safe, clean, and efficient multimodal transportation options helps to connect residents to community amenities and job opportunities, promotes active transportation, reduces air pollution, and improves safety for all users. With proper planning, housing development elegantly complements the state's goals in boosting transit ridership.

Integrate green infrastructure into new housing. Electric vehicle charging stations and related infrastructure, bike racks and lockers, and traffic signals that promote pedestrian and bike safety are critical parts of housing site plans. Reducing speed-limits along local access corridors and introducing lighting and traffic control measures can encourage multi-modal transportation and micro-mobility.

Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution.

Minimize parking mandates near transit. Residential Site Improvements Standards' mandatory minimums for parking should be modified to reflect

Commented [LK2]: Even though the heading of this section is Health and the Environment, I didn't see a lot of health content presented. I am suggesting inclusion of a sentence that addresses the impacts of housing on health or changing the heading of this section.

Page 40-41

Hazard Mitigation (Flooding, Extreme Heat, Wildfires, and Other Adverse Impacts of Climate Change) – Priorities

New Jersey faces climate-related risks like extreme heat, flooding, wildfires, rising temperatures, and sea-level rise that endanger residents and property. To address these threats, the State should support local efforts to assess vulnerabilities, integrate findings into land-use strategies, and prioritize adaptive infrastructure. Urban areas and those affected by the heat island effect, should implement green cooling strategies such as tree canopies and green roofs. Forest management, including fuel load reduction and selective burning, is essential to control wildfire risks in Wildland-Urban Interface (WUI) areas, while watershed-level planning and comprehensive stormwater modeling can reduce flood impacts and improve water quality. By proactively planning and implementing measures to lessen the impact of future disasters, mitigation efforts aim to minimize loss of life, injuries, and short- and long-term health consequences. Collaboration across governments, nonprofits, and academic institutions is encouraged to promote nature-based solutions and a holistic approach to climate resilience.

Page 56

Equity and Environmental Justice - Priorities

A fundamental principle in the implementation of the State Plan is to provide equitable outcomes for all New Jersey residents through the achievement of the goals of the State Planning Act and to promote thriving communities through past planning-related and policy actions. The benefits of implementing the State Plan will be equitably distributed among all residents, and in fact, contribute to redressing past harms of over-pollution mistakes and correcting unfair outcomes.

All levels of government should take appropriate action to foster public engagement in a manner that ensures the benefits and burdens of implementing of the State are equitably shared by all of our communities.

In contributing to the development of the State Plan, many have expressed concerns about equity and justice. Indigenous peoples have had their traditional lands confiscated, and certain lands they consider sacred, such as ceremonial stone landscapes, have been desecrated. Many urban centers and communities of color have suffered from decades of under-investment or disinvestment in Brownfields remediation, pollution, contaminated sites, infrastructure, urban parks, public transit and/or pedestrian and bicycle/micro-mobility safety investments, or upgrades to substandard housing. The State recognizes a backlog of public health and quality of life challenges that disproportionately affect overburdened communities.

Commented [LK3]: I think using the word, mistakes, can be interpreted as dismissive. Some of the disproportionate burdens are the result of intentional policies or practices.

Commented [LK4]: I don't think we can discuss equity and environmental justice without acknowledging these communities.

Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827 Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov May 2, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of Frelinghuysen, Warren County Project No. FRB-001

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of Frelinghuysen, Warren County. Frelinghuysen submits the following comments and concerns in italics, which are grouped according to chapter.

1. Concern: Housing Emphasis and Barrier Reduction Appears Designed to Advance Fourth Round Affordable Housing Goals

The Draft State Plan's emphasis on **removing development barriers**—paired with its **strong focus** on **housing as a central economic driver**—appears to align directly with the current Fair Share Housing framework and supports the DCA's Fourth Round affordable housing numbers. This alignment **does not seem coincidental, but rather intentional and policy-driven**.

Our Concern: These strategies, while potentially effective in urban and suburban growth centers, will place undue pressure on rural municipalities like Frelinghuysen Township, which lack critical infrastructure such as public water, sewer, and transit access. Applying this approach uniformly across the state, without considering local geographic and logistical constraints, risks forcing unsustainable development on communities that are neither designed nor equipped to absorb it.

2. Contradictions Between Housing Mandates and Preservation Policies

The plan promotes **affordable housing mandates, farmland preservation, environmental protection, and compact growth**—goals that are in conflict when applied in rural settings. In Frelinghuysen, large areas are preserved through state farmland programs thus limiting available land for any development.

Our Concern: Towns are being asked to meet housing quotas while also protecting land that cannot be developed. This creates an unworkable dynamic that forces density into environmentally or logistically unsuitable areas, especially where infrastructure (sewer, water, roads) is lacking. The Draft State Plan also suggests redevelopment options, up-zoning, and accessory dwelling units blind to communities that lack sewer and water infrastructure.

Project No. FRB-001 May 2, 2025 Page 2 | 5



3. Mandated Stormwater Compliance (Tier B to Tier A) Without Funding

Frelinghuysen was **mandated to transition from Tier B to Tier A stormwater regulations**, resulting in costly upgrades, mapping, maintenance, and compliance reporting. While some of the initial non-reoccurring costs where covered from a state grant, the remaining cost as well as all associated reoccurring costs will fall directly to the tax payer.

Our Concern: While the DEP technically oversees stormwater policy, the Draft State Plan incorporates environmental resilience goals that rely on municipal implementation. Without funding or resources, unfunded mandates place disproportionate burdens on small towns with limited staff and tax capacity.

4. Transit Expansion Without Rural Protections

The Draft State Plan promotes **transit expansion and multi-modal connectivity**, which includes projects like the Lackawanna Cutoff restoration. These efforts may improve regional access but also **introduce significant development pressure** in towns unequipped to absorb it.

Our Concern: Without safeguards, transit access can **trigger rapid housing development**, altering the rural character, increasing demand on schools and emergency services, and pushing out long-time residents. **No provisions exist in the plan to protect small towns from this kind of unintended consequence**.

5. Long-Term School Tax Impacts from Farmland Preservation

Farmers who preserve land receive a one-time payment for development rights, but that land then no longer contributes to future development or property tax growth, especially for schools. Over time, this leaves a permanent funding gap for education.

Our Concern: Preserved farmland is exempt from traditional growth and ratable contribution, but towns are still responsible for educating residents.

Policy Suggestion: Tether School Funding to Farmland Preservation to Ensure Long-Term Educational Stability

The State should consider **tethering school funding formulas to the percentage of preserved farmland within a municipality**, ensuring rural communities are not penalized for participating in a program the State actively promotes. This policy would provide a **long-term solution that links farmland preservation with school tax stability**, particularly in low-growth, high- preservation towns like Frelinghuysen.

Currently, the **school funding formula is outdated**—it relies heavily on **enrollment numbers** and does not account for municipalities that have preserved large portions of their land, limiting their ability to grow their ratable base. This structure **incentivizes rural towns to preserve open space and farmland**, yet **penalizes them financially by withholding adequate school aid**, forcing property taxes to rise on fewer remaining taxable parcels.

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This contradiction may be one of the **State's greatest policy inconsistencies**: promoting land preservation and clean water protection while **eroding the financial sustainability of the very communities doing the preserving**.

Furthermore, the current system **hurts the very farmers it claims to protect**. Farmland preservation provides a one-time payment in exchange for permanent restrictions, but **school taxes continue to rise**, especially in towns losing state aid due to static or declining enrollment. Over time, the farmer is **taxed beyond what the land can support**, leading to financial hardship, disincentivized farming, devaluation of preserved land, and ultimately, **the loss of farming as a way of life**.

This is not just a funding issue—it's an existential one. If we are serious about protecting our farmland, our food security, and our drinking water, then **our policies must align**. We must stop **playing political games with our children's education** and start building funding systems that recognize **the real economic contributions and sacrifices rural communities make**.

6. Rural Economic Development Alternatives Are Lacking

The Draft State Plan emphasizes job creation and innovation hubs, largely tied to **urban and growth center development**. Rural-appropriate economic models—like agritourism, ecotourism, value- added agriculture, and rural entrepreneurship—are underrepresented.

Our Concern: Rural towns need tools tailored to their environment. The plan should prioritize grants and incentives for farm-based businesses, broadband expansion, trades, remote work, and sustainable tourism, rather than defaulting to housing growth as the primary driver of rural economies.

The Sustainable and Inclusive Development – Priorities section of the Economic Development Goal (page 21) does discuss encouraging agricultural economic development to "enhance the viability of agriculture, retain, and expand key services and industries that underpin our agricultural sector, such as regional food hubs, food processing facilities, agricultural equipment supplies, and urban agriculture, as an industry." Additionally, the Natural and Water Resources Goal discusses farmland preservation objectives that include maintaining the long-term viability of the agricultural industry, mitigating climate change impacts through preservation, and utilizing local food production to address food insecurity and promote health communities. However, no tools (grants, incentives, programs, etc.) to achieve this goal are mentioned. Additionally, the Plan lacks discussion on encouraging and enhancing the agrotourism industry in the State, which is vital to supplement many farmer's incomes.

7. Voluntary Programs Often Become Mandates Over Time—Undermining Local Control

The Draft State Plan presents many of its recommendations as "voluntary" or "guidance-based." However, municipalities have repeatedly seen how such programs **evolve into de facto mandates**, especially when future **funding eligibility, regulatory compliance, or court enforcement** becomes tied to them.

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Our Concern: Frelinghuysen Township and other rural communities have reason to be cautious. Well-known examples—such as the **Council on Affordable Housing (COAH)** and the **Tier A stormwater designation**—demonstrate how policies that start as optional can quickly become mandatory through legislation, judicial decisions, or regulatory reinterpretation.

The Draft State Plan Endorsement process, while technically voluntary, is already **tied to funding priorities** and inter-agency coordination, creating pressure for municipalities to align with state goals—even when those goals may **conflict with local conditions or capacity**.

Municipalities are often penalized or excluded from funding opportunities unless they comply. This pattern erodes trust and places small towns in a defensive position, constantly trying to preserve local autonomy in the face of shifting state priorities. It reflects a clear carrot-and-stick approach that frequently pressures changing governing bodies within township structures to make decisions that may forfeit more than they understood at the time, all to secure the promise—not even the guarantee—of future funding.

This creeping mandate structure undermines the flexibility rural towns need to manage growth responsibly. For small municipalities, complying with broad, one-size-fits-all policies is often unrealistic, unaffordable, or contrary to the community's long-term vision.

Frelinghuysen supports coordinated planning—but the process must include firm protections for local decision-making and clear assurances that participation in state-aligned planning remains truly optional, particularly when local infrastructure, geography, or environmental protections limit development potential.

8. Threats to Local Control and New Jersey's Home Rule Status

The Draft State Plan suggests the consolidation and/or elimination of local control of planning procedures. Under the Housing Goal, it is noted that certain zoning would be inconsistent with the State Plan if it excludes residents from communities with jobs and high-performing schools. Additionally, "restrictive zoning" that reinforces socioeconomic segregation and bans multifamily development or accessory dwelling units is mentioned in the document. Furthermore, the Implementation chapter specifically states that Municipal planning in the State is outdated, and local governments lack resources to handle planning related procedures. The Draft State Plan suggests regional planning as the "framework for decision making" and for regional considerations to address "inequitable municipal planning capabilities."

Our Concern: This language appears to be a threat to municipal control over local planning. The Draft State Plan provides no guidelines or framework for how a municipality would be determined to lack resources or be inequitable. Additionally, it is unclear what type of zoning would be "inconsistent" with the State Plan update. Is it single-family or multi-family zoning, the actual location of zones, or something else? Would this apply to existing zoning that has historically been in place for decades or only newly-created zones? Furthermore, under the Draft State Plan, nearly all of the zoning in place in Frelinghuysen would be "restrictive zoning" as multi-family development is not permitted in the Township. However, the lack of any water or sewer infrastructure

Project No. FRB-001 May 2, 2025 Page 5 | 5



precludes multi-family development. It is, therefore, unclear how the Township of Frelinghuysen could align its zoning and Master Plan with the Draft State Plan based on the suggestions provided.

Additionally, the lack of detail regarding how a municipality would be determined to lack resources or be inequitable creates confusion on how municipalities would be classified.

9. Lack of Representation in the Planning Process

Frelinghuysen Township was **not invited to participate in any stakeholder meetings or focus groups** during the development of the Draft State Plan. Furthermore, **two farmland representative seats remain vacant** on the State Planning Commission.

Our Concern: For a plan intended to guide statewide development, the lack of rural representation—particularly from farmland-reliant municipalities—is unacceptable. Towns like Frelinghuysen deserve a seat at the table when policies are being crafted that will determine their long-term development, funding eligibility, and land use flexibility.

The Township of Frelinghuysen encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Frelinghuysen welcomes a meeting to discuss the requested State Plan Policy Map.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Township Planner

cc: Keith Ramos (via email <u>kramosftc@gmail.com</u>)

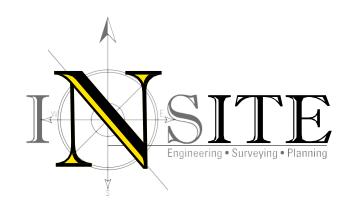
Robert Stock (via email rhstockfc@gmail.com)

David Dech, Planning Director, Warren County (planningdept@co.warren.nj.us)

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April 28, 2025

Department of State Office of Planning Advocacy PO Box 300 Trenton, NJ 08625



Via Email: stateplan.comments@sos.nj.us

Re: Comments on the Draft version of the New Jersey State Development and Redevelopment Plan by the Borough of Totowa, Passaic County,

To whom it may concern:

Our firm has been tasked by the Borough of Totowa ("the Borough") to conduct a comprehensive review of the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("the Draft Plan"). In collaboration with the Borough, we have identified key issues, comments, and concerns related to the Draft Plan. These reflect not only our professional analysis but also the priorities, perspectives, and input received directly from Borough officials and stakeholders.

To provide clarity and organization, the comments and concerns are grouped according to the relevant chapters of the Draft Plan.

- It should be noted that, upon reviewing the current list of State Planning Commission members, there does not appear to be a single local elected official currently serving from a suburban municipality. This lack of representation is concerning, given the significant impact that the State Development and Redevelopment Plan will have on local communities—particularly suburban towns like the Borough. We strongly urge the Governor to appoint one or more elected officials from suburban municipalities to the Commission to ensure that the perspectives, needs, and challenges of suburban towns are adequately represented and advocated for throughout the planning process.

Executive Summary

- Pages 11- 12 - the overall stated goal of the plan is to provide for all New Jerseyans the opportunity to ," enjoy and benefit from pristine natural resource grounding and within pedestrian control, affordable, healthy, resilient, and sustainable communities, including housing which, for the most part, will be closed and walkable to well-paying jobs, shops, schools, venues further arts and culture, accessible open space and trails, and high quality transportation services." It further notes that plan further notes that, "[l] and preservation should be encouraged, and balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high density residential areas."

As currently written, the Draft Plan presents internal inconsistencies—particularly between the stated emphasis on protecting natural resources and limiting land disturbance, and the apparent prioritization of large-scale residential development.

The Plan appears to suggest that the need for additional housing outweighs other important considerations, including environmental protection. While we recognize that there is a need for more housing across the state, the Borough maintains that this housing should be strategically concentrated in areas already equipped with the infrastructure to support higher-density development.

In suburban communities such as Totowa, the type of residential growth proposed in the Draft Plan would necessitate significant infrastructure upgrades and place considerable strain on already burdened transportation networks and public services. The Plan, as currently drafted, does not sufficiently account for these challenges.

Therefore, the Borough recommends that the Plan more explicitly support strategies that prioritize infrastructure enhancement, protect remaining open spaces, and promote context-sensitive redevelopment. Without clearer guidance on how to achieve a sustainable balance between preservation and development, the Plan risks imposing disproportionate growth pressures on fully built-out or infrastructure-limited communities.

- Page 12 the Plan states that," New Jersey should enhance the latent human capital and underperforming economic assets located in underutilized areas and centers in all locations dash urban, suburban, or rural. Vacant and abandoned property should be restored and returned to productive tax rolls, where applicable."
 - Concerning revitalization and recentering, the Borough feels that the restoration of existing vacant and abandoned properties should be the highest priority when discussing underperforming economic assets. The state should enact policies that incentivize redevelopment of existing previously developed spaces versus the development of undeveloped properties. This would align with other goals mentioned throughout the draft with particular emphasis on the goals of reducing soil disturbance and waste of construction.
- Page 13 the Plan notes," the state must support and use the state plan and plan endorsement process as a guide to achieving comprehensive, coordinated, short and long term planning actions that are based on actionable metrics, capacity analysis that supports efficient and effective growth, and active citizens participation. Planning should be integrated with investment, programming, and regulatory land use decisions at all levels of government and the private sector in an effort, effective, and equitable manner, so that land use planning and transportation planning are closely intertwined and mutually reinforcing. Land use decisions that failed to consider impacts on neighboring communities, are driven by short-term fiscal

considerations or prejudice, or are contrary to sound planning principles are inconsistent with the state plan.

The Borough feels that impacts on the local community should also be included among the concerns with respect to sound and integrated planning process for any municipality. We concur that effective planning must consider impacts on neighboring communities, however we feel that the municipal residents and stakeholders where the development is taking place must be given due deference. Residents must have a say, and their concerns must have priority over the concerns of residents outside of their municipality.

 Page 14 – The Plan states, "Land use planning in New Jersey can champion and implement progressive ideas that have positive impacts on the prosperity and quality of life in New Jersey."

The Borough feels that this goal can be better phrased and suggests stating that," land use planning can be utilized to develop policies that have positive impacts on all residents of New Jersey."

Economic Development Goal - Government coordination - priorities

- Page 18: The Plan indicates that it is a goal to, "[r]estructure and simplify government regulatory activities through comprehensive planning and careful reengineering to eliminate unnecessary bureaucracy and costly delays. Provide the resources necessary to complete project reviews quickly without sacrificing the quality and thoroughness of the review. "

The statement does not provide any context with respect to what regulations should be changed. The Plan should be more specific regarding what parts of the development approval process should be altered.

- Page 20-21: The Plan, [e]ncourage[s] county and local governments to include a regional job to housing analysis as part of municipal master planning, to understand the balance between employment and housing opportunities, and whether the local housing stock is appropriate for the local labor force. Encourage municipal master plans to provide proximity between housing and access to employment to achieve a balance between housing and job opportunities and to ease commuter travel."

While the intent to balance jobs and housing through regional analysis is commendable, it is important to recognize that many workers voluntarily choose to live in towns other than where they work. These choices are often driven by personal lifestyle preferences, school systems, family needs, or community ties—not necessarily by a mismatch between housing stock and job locations.

Attempting to engineer proximity between jobs and housing without accounting for individual autonomy could oversimplify complex residential patterns. Not all jobs

are interchangeable, nor are all workers seeking the same type of housing or lifestyle. A more nuanced approach that considers worker mobility, remote work trends, and regional transit options might be more effective than a one-size-fits-all proximity-based strategy.

Housing Goal

- Page 23 – As a housing strategy, the Plan state that the goal is to," [e]nable housing growth in transit rich, mixed income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market rate units to meet future population growth and address affordability needs. The Plan goes further to state the Plan desires to," [e]ncourage municipalities to adopt inclusionary zoning, streamline development, through public private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

While the goals of supporting housing growth in transit-rich, mixed-income communities are well-intentioned, this strategy overlooks key practical and environmental constraints. Many municipalities, including the Borough, are already fully built out with limited capacity for further development without significant redevelopment or rezoning efforts.

Inclusionary zoning and public-private partnerships have indeed played a role in supporting diverse housing types, but they cannot be applied uniformly. These strategies must be weighed against the realities of existing infrastructure capacity, environmental constraints, and the character of the built environment. Additionally, the strategy does not fully account for the economic realities faced by developers—housing projects must be financially viable. Developers cannot be expected to pursue projects out of goodwill alone; incentives or feasible economic models must be part of the discussion.

Furthermore, many current homeowners wish to maintain their existing dwellings and community character. Any strategy that overlooks these preferences risks local pushbacks and diminishes public support. A more context-sensitive approach that considers both the limitations and opportunities within fully developed communities would be more appropriate.

- Page 23 – as a goal, the Plan notes that, "[i]deally, new housing will be created in transit rich locations and in communities that are ethically and economically diverse and integrated."

The aspiration to create new housing in transit-rich, economically, and ethnically diverse communities is commendable. However, this approach does not consider municipalities like the Borough, which have limited or no meaningful transit access. The current plan lacks a parallel strategy or goal for communities that fall outside of transit-served areas.

Without such a provision, municipalities with limited transit options are left without a clear housing framework that aligns with regional goals. These communities still need to plan for growth, affordability, and diversity in housing options—just within a different context. The plan should be expanded to include guidance for how these municipalities can contribute to housing goals through alternative means, such as enhancing walkability, encouraging compact development near town centers, or strengthening local employment-housing linkages.

In short, one size does not fit all—especially when it comes to transit access.

- Pages 23 and 24 – the Plate notes that," [z]oning used to exclude potential residents from communities with plentiful jobs and high performing schools is inconsistent with the plan."

The Plan does not provide any examples or context with respect to this goal. Are existing zoning classifications to be considered inconsistent with the goals of the Plan?

- Page 26 – The Plan states that, "nothing in this plan is to be interpreted as a reason for municipalities not to meet its housing requirements as promulgated in New Jersey statutes. Where municipality has limited land suitable for development, redevelopment options, up zoning, or other similar solutions must be implemented to meet constitutional requirements."

The word "must" in the above-mentioned statement is not correct. Municipalities have several options with which to implement their constitutionally mandated obligation which can include a vacant land adjustment noting that there is little developable land. This statement should be rewritten to address all available municipal options.

- Page 27 – The Plan indicates that," ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes and ADUs are needed to make homeownership attainable for low- and moderate-income households."

While the goal of expanding ownership opportunities for young workers and families is important, this section lacks critical context. Terms such as "starter homes" and "ADUs" (assumed to mean Accessory Dwelling Units, though not defined in the glossary) should be clearly defined to ensure consistent understanding and application across municipalities.

Additionally, in the context of the Borough, the existing housing stock already consists largely of single- and two-family dwellings, which may already function as de facto starter homes in many cases. The plan should recognize and build upon the existing housing fabric rather than assume a universal deficiency.

Equally important, housing strategies must consider the needs and desires of existing residents. Prioritizing growth without respecting current community character and resident input risks eroding public trust and undermining the effectiveness of planning efforts. Good public policy must strike a balance between welcoming new residents and preserving the values of those who already call the community home.

 Page 27 – The Plan states that, "many restrictive zoning practices are rooted in, and served to reinforce, socioeconomic segregation. Zoning codes which banned multifamily development or band ADUs will also restrict housing affordability and disincentivize private development."

The term "restrictive zoning practices" should be clearly defined within the plan to avoid ambiguity and ensure consistent interpretation. While the statement that bans on multifamily housing or ADUs restricts affordability and disincentivize development may hold true in some contexts, it lacks necessary nuance and supporting examples.

Zoning decisions are often informed by a range of factors—not solely socioeconomic considerations. Environmental constraints, infrastructure capacity, traffic concerns, and the character of existing neighborhoods can all contribute to the appropriateness or inappropriateness of allowing certain housing types in particular areas.

The Plan should acknowledge that while zoning reform can be an effective tool to promote affordability and inclusion, it is not universally applicable. A one-size-fits-all approach could result in unintended consequences if local conditions are not taken into account. Including case studies or best practices where zoning reform has worked—alongside acknowledgment of where it may not be suitable—would strengthen the overall credibility and usefulness of this section.

- Page 29 – the Plan states, "appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

This statement needs to be qualified with statistics that demonstrate that housing boost transit ridership.

- Page 33 – As a transportation priority, the Plan states that,"[u]se appropriate transportation strategies to link places of residence with those areas of growing employment opportunities identified in the State Plan, with particular emphasis on providing appropriate transit service to underprivileged neighborhoods.

While the goal of linking places of residence with areas of growing employment—especially through enhanced transit access to underserved neighborhoods—is laudable, it is equally important to recognize that individuals choose where to live

for a variety of reasons beyond proximity to work. Factors such as school quality, family ties, cultural connections, housing costs, and overall neighborhood conditions all influence residential choices.

Therefore, while improved transit and job access are essential, the strategy should also emphasize the importance of investing in the overall livability and infrastructure of neighborhoods. Enhancing the quality of life in underprivileged or overlooked areas—including safety, education, green space, and community services—will contribute more holistically to housing and employment equity than simply linking the two geographically.

The plan would benefit from a broader perspective that acknowledges these complex, interconnected factors.

- Page 34 – The Plan states that," [a]ll new buildings in the State should be energy efficient and existing buildings should be retrofitted and weatherized to reduce energy demand.

While the objective of ensuring energy efficiency in all new buildings and promoting retrofitting and weatherization of existing buildings is commendable, this goal should be expanded to address practical challenges faced by municipalities—particularly those with a large stock of older buildings, such as the Borough.

Retrofitting and weatherization efforts can be prohibitively expensive, and in many cases, the long-term savings may not be significant enough to motivate property owners to invest in such improvements without substantial support. The plan should clarify whether this is intended as a statewide initiative or if local governments will be expected to independently develop programs and incentives.

If the latter, consideration must be given to how these initiatives would be funded and administered at the local level. Without clear guidance, technical support, or financial assistance mechanisms, the goal may be unrealistic for many municipalities and property owners. A phased or incentive-based approach may be more appropriate and achievable.

Revitalization and Recentering Goal

- Page 36 – Revitalizing Older Cetner – Priorities - The section states that "New Jersey should promote the development of new centers and optimize land use policies to relieve overburdened areas, increase housing and business opportunities, and enhance access to amenities. By prioritizing redevelopment in transit-connected and underutilized areas, reducing excessive parking requirements, and streamlining local development procedures, the state should seek to support sustainable, pedestrian-friendly growth that meets the needs of evolving communities and maximizes land efficiency."

- While this vision is commendable, a specific concern arises regarding underutilized areas that are not transit-connected and not easily adaptable to mixed-use development. These areas—often suburban or exurban in character—may lack the infrastructure, zoning flexibility, or market demand for traditional smart growth models. The Plan should provide more guidance on how to address these kinds of places, including strategies for:
 - *Incremental infill and context-sensitive redevelopment.*
 - Supporting adaptive reuse and small-scale commercial or residential retrofits.
 - Enhancing basic infrastructure to allow for future adaptability.
 - Encouraging context-specific zoning reform even in car-dependent areas.

Addressing this gap would ensure that revitalization strategies are inclusive of all community types—not just those with immediate transit access or mixed-use potential.

- Page 37 – The Plan notes that, "[a]uto centric planning over the past decades has resulted in an excessive number of parking lots across New Jersey's urban and suburban landscapes, many of which are becoming vacant as more of our workforce works from home or utilizes different mobility options. Faith-based organizations have already identified this shift and have been developing housing and businesses on their vacant parking lots. Municipalities should evaluate the opportunity to purchase or redevelop underutilized parking lots to reduce the urban heat island effect and address housing needs and achieve other goals of the state plan."

To effectively implement this recommendation, the Plan should emphasize that municipalities must engage in partnerships with private property owners, including businesses, religious institutions, and shopping center owners. Collaborative approaches—such as joint ventures, land swaps, incentive programs, and zoning overlays—will be essential to facilitate redevelopment of these spaces in a way that balances community goals with private interests.

Incorporating this guidance would strengthen the Plan's practicality and help unlock a significant amount of land for housing, green infrastructure, and mixed-use revitalization, especially in areas not well-served by transit or traditional smart growth frameworks.

- Page 38 – Under Recenter Underutilized Developed Areas – Priorities, the Plan notes that," [l]andscape buffers common in suburban zoning districts constitute impediments to pedestrian circulation should be modified to incorporate walking paths as part of every recentering effort. The Plan further states," auto oriented commercial strips may contain a wide diversity of uses, but without housing they usually have no nighttime activity."

While it is true that suburban zoning and large landscape buffers can present barriers to pedestrian connectivity, most municipal buffering regulations already allow for pedestrian egress or exceptions. However, it is important to recognize that these buffers serve a critical compatibility function—particularly between residential and non-residential uses. For example, landscaped buffers often function as noise barriers from delivery truck activity, loading zones, and other commercial operations that could negatively impact adjacent residential neighborhoods. The Plan should acknowledge this dual role and encourage context-sensitive solutions that balance walkability with buffering needs.

The statement that auto-oriented commercial strips "have no nighttime activity" is an overgeneralization. Many of these areas do in fact have significant evening activity, particularly where restaurants, bars, and late-night services are located. While it is true that the absence of residential development may limit 24-hour vibrancy, the Plan should qualify this claim and better distinguish between inactive commercial zones and those that are already active into the evening.

The Plan should offer more nuanced guidance for retrofitting commercial strips, including encouraging pedestrian connectivity without compromising necessary land use buffers, and recognizing existing economic activity while promoting more complete, mixed-use redevelopment.

Natural and Water Resource Goal

- Page 43 – Under Goals, the Plan states that," all levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species and the use of toxic building materials and prioritize natural and natural based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public right of way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Borough agrees with and supports these environmental protection goals. Development should not come at the cost of ecological integrity or community health. However, the Plan also earlier emphasizes that building new homes is the most important priority—particularly to address affordability, population growth, and economic development. These two directives—expanding housing and preserving the environment—can often be in conflict, especially in communities facing land constraints.

The Plan should provide clearer guidance on how these priorities are to be reconciled. For example:

• Where should new housing be prioritized to reduce environmental impacts?

- What tools are recommended to identify low-impact development opportunities?
- How can local governments be supported in navigating tradeoffs between conservation and development?

Acknowledging the inherent tension and providing concrete strategies for balancing these goals would make the Plan more actionable and internally consistent.

- Page 44 – Under Habitat Preservation and Restoration- Properties, the Plan notes," Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

The Borough notes that the protection and restoration of habitats for threatened and endangered species fall under the jurisdiction of the New Jersey Department of Environmental Protection (NJDEP). As such, municipal zoning codes are preempted by state authority in these matters. Any planning guidance related to these sensitive environmental areas should acknowledge and defer to NJDEP's regulatory framework to avoid confusion and ensure consistency across state and local jurisdictions.

- Page 44 – The Plan also states that," [m]unicipalities, with the technical support and assistance of State agencies, should adopt construction standards and performance standards for new development that minimizes soil disturbance during construction and steep slope areas."

Once again, it is important to clarify that the regulation of construction standards falls under the jurisdiction of the NJDEP and the Department of Community Affairs (DCA). Any references within the Draft Plan to construction practices, building standards, or environmental performance requirements should be addressed to the NJDEP and DCA.

- Page 44 – The Plan further states that as another goal is to," [c]ontinue to design forest management practices to protect watersheds, wetlands, stream corridors and water bodies from non-point source pollution that brings water quality and aquatic habitat. Encourage and support planning and maintenance of trees, including established forested areas of native species.

The Borough supports these environmental goals and recognizes the importance of protecting natural resources and water quality.

However, it must also be acknowledged that some areas with sensitive environmental features—such as land along the Passaic River—have been designated as developable for housing by the New Jersey Department of Community Affairs. This reflects a broader and recurring issue within the Plan: the tension

between the State's priority to accelerate housing production and the equally critical need to preserve environmental resources.

The Plan should explicitly acknowledge this tension and provide more detailed guidance on how local governments and agencies can navigate these competing objectives. This may include:

- Clear criteria for evaluating development potential in environmentally sensitive areas:
- *Incentives for low-impact or conservation-oriented development.*
- Coordination between DCA housing priorities and DEP environmental regulations.

Such clarification would help municipalities balance growth mandates with local stewardship responsibilities.

Page 47 – Under Water Quality – Priorities, the Pl state that ," [c]onsistent with state mandates to reduce the risk of flooding, recognize areas that are prone to flooding now and in the future, including but not limited to Flood Haard Areas, (as determined by DEP) of less than one square mile as Critical Environmental Sites. This will bring planning and protection efforts, such as the implementation of minimum flood protection standards, into alignment.

The Plan's recommendation to classify areas prone to flooding—including Flood Hazard Areas, even those under one square mile—as critical environmental sites is a valuable and necessary step toward aligning planning with flood protection and climate resilience goals. The Borough strongly agrees that minimizing repeated flood risk is essential for public safety, infrastructure protection, and long-term community sustainability.

However, there is a clear conflict between this objective and other state-level guidance. For example, DCA identified areas along the Passaic River—which are known to be flood-prone—as "developable" and included in their 2025 Affordable Housing calculations. This sends mixed signals to municipalities attempting to comply with both housing production mandates and climate resilience requirements.

The Plan should:

- *Acknowledge this policy inconsistency.*
- Offer clearer coordination guidance between DEP and DCA frameworks.
- Propose criteria for how municipalities can responsibly plan housing in or near flood hazard zones, including mitigation strategies and design standards.

Without such clarification, local governments are left to navigate conflicting state objectives, which may ultimately undermine both housing and environmental goals.

Chapter D. Implementation

- This chapter discusses the State Plan Policy Map associated with the State Plan, including the distinctions between Planning Areas, Centers, and Environs, as well as the five Planning Areas (PA-1 through PA-5).

While the document references the "State Plan Policy Map" seventeen times, it fails to inform the reader where to actually find this map. Notably, page 120 clarifies that the "Smart Growth Explorer is not part of the official State Plan Policy Map," further compounding the confusion. The Draft State Plan itself does not include a copy or reproduction of the State Plan Policy Map. However, the Office for Planning Advocacy website provides a link to an Interactive Locator Map, which displays the Planning Area boundaries. This map may be accessed at the following link: https://nj-map.com/sdrp/stateplan/?override=1&zoom=8&lat=40.1474&lng=-74.88135009765627&sc=0&basemap=Mapbox%20Satellite&layers=9445,9446,94 90,9444,9441&ois=&oms=&po=

Since there is no physical or static version of the State Plan Policy Map included in the Draft State Plan, it is unclear whether the map's boundaries and/or designations are subject to change by the State at any time. As of now, the metadata associated with the Planning Areas layer indicates a most recent update on November 24, 2024. For the sake of transparency and clarity, the Draft State Plan should be supplemented with a copy of the official State Plan Policy Map.

Planning Area Designation – Borough Analysis:

Based on the Interactive Locator Map, the Borough lies entirely within the Metropolitan Planning Area (PA-1).

Page 72:

- One of the stated intents of PA-1 is to," [p]rovide for much of the state's future growth in compact development and redevelopment." The guiding criteria for PA-1 designation include:
 - A population density greater than 1,000 persons per square mile;
 - Existing public water and sewer infrastructure;
 - Access to public transit;
 - A land area of at least one square mile; and
 - *A population of at least 25,000 residents.*
- While the Borough has a population of only 10,785 residents, it meets the density criterion with 2,766.3 persons per square mile. The Borough also contains significant non-residential land uses, including four large cemeteries with approximately 22,000 interments, and several major stateowned facilities, such as a New Jersey State Police Barracks and an NJ Turnpike Authority office. Additionally, the Borough is traversed by major regional roadways including Routes 46 and 80.

These unique characteristics may warrant further consideration when evaluating the appropriateness of the Borough's PA-1 designation.

- Page 83 – Under Implementation, the Plan states, "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional consideration should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities." The Plan further states," it is important that each municipality view itself as part of a region, not a singular entity. Providing local planning and zoning board members with the substantive education the technical assistance and planning discipline is imperative."

The Borough strongly objects to the assertion that municipal planning in New Jersey is outdated. While we recognize the value of regional considerations, they must be balanced against the unique needs and character of individual communities. New Jersey is not a one-size-fits-all state, and these statements in the Plan appear to reflect a bias toward urban environments and solutions that are often inapplicable to suburban or rural municipalities.

As a suburban community, many of our residents have intentionally chosen to live here to avoid the density, congestion, and planning challenges often associated with urban living. The Draft Plan seems to suggest that bureaucrats, academics, and non-local institutions are better equipped to make planning decisions than locally elected officials, who are directly accountable to their constituents.

Under the Municipal Land Use Law (MLUL), municipalities are given the authority to adopt and enforce zoning regulations that reflect the values, priorities, and needs of their populations. This system of local governance has served the state well and should not be diminished in favor of centralized or regionalized control.

The Borough urges the State to reconsider the language and tone of this section and to affirm the importance of local autonomy in planning decisions, while still encouraging voluntary regional coordination where appropriate.

Sincerely.

Robert A. Hudak, MPA, PP, AICP

Borough Affordable Housing Planner

Borough of Totowa

Cc: Hon. John Coiro, Mayor (via email: mayorcoiro@totowanj.org)
Hon. Kristin Corrado, Borough Attorney (via email: kristin@corrado.law)
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Via Email: stateplan.comments@sos.nj.gov April 24, 2025

Department of State
Office of Planning Advocacy
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Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Borough of Hillsdale, Bergen County Project No. HDB-001

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Borough of Hillsdale, Bergen County. Hillsdale submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

Hillsdale seeks clarification on the statement "provide for a proportional increase in housing". What does proportional mean? The text should be revised to define or explain the quoted phrase.

 Page 13. Historic and Scenic Resources is another one of the Draft State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Borough supports this statement and encourages public access to the Borough's County and Municipal open spaces.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

 Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population Project No. HDB-001 April 24, 2025 Page 2 | 10



growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

This section contains the first mention of the term "accessory dwellings" in the Draft State Plan. It is stated throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."

No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided. It is unclear, as written, if this is an attempt to undermine home rule.

Page 26. Housing as a Catalyst for Economic Development – Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text "In areas where water and wastewater infrastructure is available and capacity remains...."

Additionally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

Page 26. Housing as a Catalyst for Economic Development – Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last

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sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined. A definition should be provided within the document.

It is unclear how this priority is to be achieved as the private sector determines what housing types are profitable. Furthermore, towns are precluded from zoning for tenure. Unless the State is going to financially incentivize these types of housing units, it is unclear who will pay for these units. Is the Draft State Plan suggesting existing residents subsidize this construction?

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive". This appears to be an attempt to undermine home rule.

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Borough contains several Category One (C1) streams including Hillside Brook, Holdrum Brook, Musquapsink Brook, Pascack Brook, and Pelican Brook. Areas around each of these C1 streams, and most significantly around the Pascack Brook and its tributaries, are within FEMA's 100-year flood zone and contain wetlands. The Borough has several vacant properties constrained by these environmental features. It is unclear how development could occur within wetlands and/or flood prone areas.

Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? Clarification is also needed on what "systems" need to be elevated. The text should be supplemented with the entity responsible for implementing the identified tasks.

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Finally, the Draft State Plan should be revised to prohibit multi-family housing construction within flood hazard areas.

 Page 29. Housing and Transportation - Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Infrastructure

- Page 31. Transportation Priorities provides several goals, two of which are:
 - Maintain and expand public transportation to areas of planned higher-density development that provide opportunities to take advantage of the efficiencies of mass transit in ways that support residential and non-residential development consistent with the Policy Objectives of the Planning Areas.
 - Clarification is needed on what "planned higher-density development" includes. Is it a specific density range or just above the average permitted density in a municipality? Who selects the planned higher density the town or the State? Clarification must be provided.
 - Prioritize the needs of pedestrians and bicyclists and enhance the design and natural characteristics of adjacent areas. Continue to promote the pedestrianization of areas around train stations and the development of a greenway.
 - The Borough has a small, walkable downtown area near the Hillsdale train station. Clarification is needed on who would be responsible to construct pedestrian and cyclist infrastructure. Would funding be made available to municipalities to subsidize the cost of the improvements?
- Pages 33 and 34. Clean Energy Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes. The Draft Plan should be revised to address this.

Revitalization and Recentering

Page 36. The Goals section states, "There are also vast auto-oriented areas of New Jersey particularly along highway corridors and major arterials that need reinvestment to make them less auto-oriented. Frequently parcels that front the highway corridor have commercial uses that back up into residential neighborhoods but have no walkable access from these

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neighborhoods. Through selective interventions, these auto-oriented areas may become more compact, walkable communities and acquire more Center-like features over time."

This text describes the existing conditions of the Borough's commercial area along Broadway, which is a County Road. The Borough supports compact, walkable communities. However, it is unclear how this would be achieved unless the County makes significant investments and corridor enhancements to enable safe pedestrian access along Broadway.

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task.

Page 38 – Recentering Underutilized Developed Areas – Priorities states, "Landscaped buffers common in suburban zoning districts constitute impediments to pedestrian circulation and should be modified to incorporate walking paths as part of every recentering effort."

These buffers, especially around commercial development along the east side of Broadway, are essential to protecting adjacent residents from noise, visual, and privacy impacts of the commercial development. Modifying these buffers could have a negative impact to adjacent residents. The Draft State Plan should be revised to add details on how buffers should be modified, while continuing to provide adequate screening to adjacent residents.

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Page 42. Coastal Areas and Riverine Corridors – Priorities states, "Promote well-managed coastal and riverine communities, including natural resource maintenance and restoration programs, to encourage economies that are compatible with the natural environment, minimize the risks from natural hazards, and provide equitable access to coastal and riverine resources for public use and enjoyment."

The Borough supports this priority. However, all of Hillsdale is identified in the Metropolitan Planning Area (PA1) on the Interactive Locator Map (see discussion below). It is unclear how this priority can be achieved if the Borough's flood-prone and wetlands areas are identified as a Planning Area earmarked for high-intensity development.

- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Promote smart growth by implementing DEP floodplain regulations."
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The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal, and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Borough supports the above goal as written but encourages the State to reconsider and revise the goals and priorities listed for housing.

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As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

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The Borough supports this priority and encourages the State to provide funding to aid in parkland development and facility upgrades.

Chapter C. State Plan Policy Map

- Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 5).
- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:
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 https://dosopa.maps.

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OPA's website

(https://www.nj.gov/state/bac/planning/documents/maps/stateplanmapMarch2025.jpg), which has a date of March 2025. The Draft State Plan should be supplemented with a copy of the State Plan Policy Map.

- Based on the Interactive Locator Map, Hillsdale is entirely within the Metropolitan Planning Area (PA1). We offer the following comments regarding the Borough's Planning Area designations:
 - o Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." The Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. Hillsdale has a population of 10,086 people according to the 2023 ACS, which does not meet the guiding criteria. The Borough is just under 3 square miles, which does equate to a density of 3,442 people per square mile and meets the guiding criteria. The Borough also has access to existing public water and sewer systems and contains a train station. Therefore, it appears that the Borough meets the guiding criteria for a PA1 designation, except for the minimum population size.
 - Hillsdale is not "metropolitan" in character, nor does it desire to become so. The Borough is suburban in nature and believes it should be reclassified. However, Planning Area 2 (PA2) Suburban calls for a population density of less than 1,000 people per square mile. Regardless, the Borough believes it should be reclassified to Suburban Planning Area (PA2) as the intents of the Draft State Plan for PA2 areas better relate to the existing conditions of and vision for the Borough of Hillsdale.
 - Designating Hillsdale as PA1 is promoting overdevelopment of the Borough. To meet the intent of PA1 of a population of 25,000 would mean more than doubling the residential population. This would necessitate significant infrastructure upgrades for water and sewer, place considerable strain on the Borough's public services and school system, and likely gridlock the Borough's street network. The designation of Hillsdale as PA1 does not account for these challenges and impacts. Instead said designation has been blindly assigned to the Borough without local input.
 - Additionally, as discussed above, the Borough contains several C1 streams with adjacent wetlands and corresponding 100-year flood zones. Consistent with the Climate Change and Natural and Water Resources Priorities discussed above, the Planning Area designation of the vacant and undeveloped areas of the Borough should be amended to the Environmentally Sensitive Planning Area (PA5) to encourage the protection of these environmental resources.

Chapter D. Implementation

 Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for Project No. HDB-001 April 24, 2025 Page 9 | 10



decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Hillsdale takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level. It is unclear how a municipality would be determined to "lack resources" and who would make the determination.

General Comments

- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.
- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.
- The Draft State Plan exhibits multiple internal inconsistencies, specifically between the protection of natural resources and limitation of land disturbance, and the evident prioritization of residential development. The Draft Plan appears to suggest that the need for additional housing outweighs other important planning considerations, including environmental protection. Thoughtful planning at the State level must seek a balance between preservation and development, otherwise the Draft State Plan will trigger a series of unintended consequences that will be difficult, if not impossible, to rectify and will be unsustainable over the long-term. The Borough strongly encourages the Draft State Plan to be reviewed and redrafted to balance preservation/conservation with development.
- The Draft State Plan proposes several goals. However, it is unclear if certain goals are prioritized over others. For example, does the Housing Goal to provide more housing supersede the goal related to Natural and water Resources (protect, maintain, restore the state's natural and water resources/ecosystems)? The aforementioned goals are in direct conflict with one another. This conflict has been and will continue to be problematic for towns as they are forced to develop and redevelop areas and simultaneously protect sensitive environmental areas. The State must revisit the goals and prioritize them, so it is clear when a conflict arises which goal prevails.

Map Changes

- The State Plan Policy Map should be enhanced with an overlay for flood hazard areas to recognize the danger stream corridors face.
- Hillsdale requests that the Borough's designation of PA1 be amended to PA2, Suburban to reflect the resident population and existing developed scale of the town. Designating Hillsdale as PA1 is



encouraging overdevelopment of the community. This classification undermines the Borough's master plan documents, zoning ordinance, and planning goals.

Hillsdale also requests that the undeveloped portions of the Borough along its C1 streams which contain wetlands and are located within the 100-year flood zone, be reclassified to the Environmentally Sensitive Planning Area (PA5) to encourage the protection of these environmental resources.

The Borough of Hillsdale strongly encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Hillsdale welcomes a meeting to discuss the requested State Plan Policy Map.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Borough Planner

CC: Mike Ghassali, Business Administrator (via email MGhassali@hillsdalenj.org) Michael Davis, Bergen County Cross Acceptance (via email mdavis@hgapa.com) Joseph Baladi, Bergen County Planning Board (via email jbaladi@bergencountynj.gov)

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Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827 Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov April 22, 2025

Department of State Office of Planning Advocacy PO Box 300 Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Borough of Montvale, Bergen County Project No. MPP-001

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Borough of Montvale, Bergen County. Montvale submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

Montvale seeks clarification on the statement "provide for a proportional increase in housing". What does proportional mean? The text should be revised to define or explain the quoted phrase.

 Page 13. Historic and Scenic Resources is another one of the Draft State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Borough supports this statement and encourages public access to the Borough's State, County, and Municipal open spaces.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

 Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population Project No. MPP-001 April 22, 2025 Page 2 | 10



growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

This section contains the first mention of the term "accessory dwellings" in the Draft State Plan. It is stated throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

The above sentences are a mission statement and a net opinion, not an evidence-based planning rationale.

- Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."
 - No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided. It is unclear, as written, if this is an attempt to undermine home rule.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."
 - This text should be revised to recognize water and wastewater limitations. Suggested text, "In areas where water and wastewater infrastructure is available and capacity remains...."

 Additionally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

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"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined. A definition should be provided within the document.

It is unclear how this priority is to be achieved as the private sector determines what housing types are profitable. Furthermore, towns are precluded from zoning for tenure. Unless the State is going to financially incentivize these types of housing units, it is unclear who will pay for these units. Is the Draft State Plan suggesting existing residents subsidize this construction?

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive". This appears to be an attempt to undermine home rule.

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Borough contains several Category One (C1) streams, including Arrowhead Creek, Bear Brook, Cherry Brook, Echo Glenn Brook, Holdrum Brook, Laurel Brook, Mill Brook, Muddy Creek, Pascack Brook, and Pine Brook. Areas around these streams, particularly Laurel, Mill, and Pascack Brooks, are within FEMA's 100-year flood zone and contain wetlands. The Borough has several "vacant" properties constrained by these environmental features. It is unclear how development could occur within wetlands and/or flood prone areas.

Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? Clarification is also needed on what "systems"

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need to be elevated. The text should be supplemented with the entity responsible for implementing the identified tasks.

Finally, the Draft State Plan should be revised to prohibit multi-family housing construction within flood hazard areas.

 Page 29. Housing and Transportation – Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Infrastructure

Page 31. Transportation - Priorities provides several goals, one of which is:

Maintain and expand public transportation to areas of planned higher-density development that provide opportunities to take advantage of the efficiencies of mass transit in ways that support residential and non-residential development consistent with the Policy Objectives of the Planning Areas.

Clarification is needed on what "planned higher-density development" includes. Is it a specific density range or just above the average permitted density in a municipality? The Borough has two Overlay Zones near the train station, which permit residential uses above the ground floor at densities of 12 and 15 units per acre. Would this be considered "higher-density"?

Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Revitalization and Recentering

Page 36. The Goals section states, "There are also vast auto-oriented areas of New Jersey particularly along highway corridors and major arterials that need reinvestment to make them less auto-oriented. Frequently parcels that front the highway corridor have commercial uses that back up into residential neighborhoods but have no walkable access from these neighborhoods. Through selective interventions, these auto-oriented areas may become more compact, walkable communities and acquire more Center-like features over time."

This text describes the existing conditions of the Borough's commercial areas including along Chestnut Ridge Road and Grand Avenue (County Roads). The Borough supports creating a compact, walkable community that is less auto-oriented. However, it is unclear how this would be

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achieved unless the County makes significant investments and corridor enhancements to enable safe pedestrian access along the corridors.

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These buffers, especially around commercial development along the west side of Chestnut Ridge Road and Paragon Drive, are essential to protecting adjacent residents from noise, visual, and privacy impacts of the commercial development. Modifying these buffers could have a negative impact to adjacent residents. The Draft State Plan should be revised to add details on how buffers should be modified, while continuing to provide adequate screening to adjacent residents.

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reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Borough supports this priority, but it is unclear what entity is charged with these actions. The text should be supplemented to indicate the responsible entity.

Page 47. Water Quality – Priorities states, "Consistent with state mandates to reduce the risk of flooding, recognize areas that are prone to flooding now and in the future, including but not limited to Flood Hazard Areas (as determined by DEP), of less than one square mile as Critical Environmental Sites. This will bring planning and protection efforts, such as the implementation of minimum flood protection standards, into alignment."

It appears the areas adjacent to the Borough's C1 streams and within the 100-year flood zone would qualify as a Critical Environmental Site. However, the Interactive Locator Map designates this area in the Metropolitan Planning Area (PA1). It is unclear what entity is responsible for determining Critical Environmental Sites and how the Borough could modify the Locator map to identify these areas.

Historic and Scenic Resources

 Page 53. Open Space and Recreational Resources – Priorities states, "Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents."

The Borough supports this priority and encourages the State to provide funding to aid in parkland development and facility upgrades.

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- Based on the Interactive Locator Map, Montvale is entirely within the Metropolitan Planning Area.
 We offer the following comments regarding the Borough's Planning Area designation:
 - Metropolitan Planning Area (PA1)

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- Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." The Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. The Borough of Montvale only has a population of 8,625 people according to the 2023 ACS, which does not meet the guiding criteria. However, this equates to a population density of 2,140 people per square mile, which meets the guiding criteria. Additionally, the Borough has access to existing public water and sewer systems and contains a train station. However, no bus routes are available. Therefore, it appears that the Borough meets the guiding criteria for a PA1 designation, except for the minimum population size. Montvale is not "metropolitan" in character, nor does it desire to become so. The Borough is suburban in nature and believes it should be reclassified to Suburban Planning Area (PA2) as the intents of the Draft State Plan for PA2 areas better relate to the existing conditions of the Borough.
- Designating Montvale as PA1 is encouraging overdevelopment of the community. This classification undermines the Borough's master plan documents, zoning ordinance, and planning goals. A population of 25,000+ residents would necessitate significant infrastructure upgrades and place considerable strain on the Borough's transportation network, public services, and school system. The designation of Montvale as PA1 does not account for these challenges and impacts. Instead said designation has been blindly assigned to the Borough without local input.
- Moreover, as noted above, the Borough contains several environmental features including C1 streams and associated 300-foot buffers, wetlands and associated transition areas, and areas within the 100-year flood zone. These environmentally sensitive areas should be revised to the Environmentally Sensitive Planning Area (PA5).

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Montvale takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level. It is unclear how a municipality would be determined to "lack resources" and who would make the determination.

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- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.
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- The Draft State Plan presents multiple internal inconsistencies, specifically between the protection of natural resources and limitation of land disturbance, and the evident prioritization of residential development. The Draft Plan appears to suggest that the need for additional housing outweighs other important planning considerations, including environmental protection. Thoughtful planning at the State level must seek a balance between preservation and development, otherwise the Draft State Plan will cause a series of unintended consequences that will be difficult to rectify and unsustainable over the long-term. The Borough strongly encourages the Draft State Plan to be reviewed and redrafted to balance preservation/conservation with development.
- The Draft State Plan proposes several goals. However, it is unclear if certain goals are prioritized over others. For example, does the Housing Goal to provide more housing supersede the goal related to Natural and Water Resources (protect, maintain, restore the state's natural and water resources/ecosystems)?
- The above two goals are in direct conflict with one another. This conflict has been and will continue to be problematic for towns as they are forced to develop and redevelop areas and simultaneously protect sensitive environmental areas. The State must revisit the goals and prioritize them so it is clear when a conflict arises which goal prevails.

Map Changes

- The State Plan Policy Map should be enhanced with an overlay for flood hazard areas to recognize the danger stream corridors face.
- Montvale requests that the Borough's designation of PA1 be amended to PA5 for areas containing environmental features, including C1 streams, wetlands, required buffers, and within the 100-year flood zone to encourage the protection of these environmental resources.
- Montvale requests that its designation of PA1 be amended to PA2 outside of the aforementioned environmental features. PA2 reflects the Borough's existing conditions and planning goals.
 Designating Montvale as PA1 is encouraging overdevelopment of the community. This classification undermines the Borough's master plan documents, zoning ordinance, and planning goals.

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The Borough of Montvale strongly encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Montvale welcomes a meeting to discuss the requested State Plan Policy Map modifications.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Borough Planner

cc: Joseph Voytus, Borough Business Administrator (via email <u>jvoytus@montvaleboro.org</u>)
Michael Davis, Bergen County Cross Acceptance (via email <u>mdavis@hgapa.com</u>)
Joseph Baladi, Bergen County Planning Board (via email <u>jbaladi@bergencountynj.gov</u>)

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Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827 Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov April 22, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Borough of Montvale, Bergen County Project No. MPP-001

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Borough of Montvale, Bergen County. Montvale submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

Montvale seeks clarification on the statement "provide for a proportional increase in housing". What does proportional mean? The text should be revised to define or explain the quoted phrase.

 Page 13. Historic and Scenic Resources is another one of the Draft State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Borough supports this statement and encourages public access to the Borough's State, County, and Municipal open spaces.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

 Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population Project No. MPP-001 April 22, 2025 Page 2 | 10



growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

This section contains the first mention of the term "accessory dwellings" in the Draft State Plan. It is stated throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

The above sentences are a mission statement and a net opinion, not an evidence-based planning rationale.

- Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."
 - No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided. It is unclear, as written, if this is an attempt to undermine home rule.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."
 - This text should be revised to recognize water and wastewater limitations. Suggested text, "In areas where water and wastewater infrastructure is available and capacity remains...."

 Additionally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

Project No. MPP-001 April 22, 2025 Page 3 | 10



"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined. A definition should be provided within the document.

It is unclear how this priority is to be achieved as the private sector determines what housing types are profitable. Furthermore, towns are precluded from zoning for tenure. Unless the State is going to financially incentivize these types of housing units, it is unclear who will pay for these units. Is the Draft State Plan suggesting existing residents subsidize this construction?

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive". This appears to be an attempt to undermine home rule.

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Borough contains several Category One (C1) streams, including Arrowhead Creek, Bear Brook, Cherry Brook, Echo Glenn Brook, Holdrum Brook, Laurel Brook, Mill Brook, Muddy Creek, Pascack Brook, and Pine Brook. Areas around these streams, particularly Laurel, Mill, and Pascack Brooks, are within FEMA's 100-year flood zone and contain wetlands. The Borough has several "vacant" properties constrained by these environmental features. It is unclear how development could occur within wetlands and/or flood prone areas.

Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? Clarification is also needed on what "systems"

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need to be elevated. The text should be supplemented with the entity responsible for implementing the identified tasks.

Finally, the Draft State Plan should be revised to prohibit multi-family housing construction within flood hazard areas.

 Page 29. Housing and Transportation – Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Infrastructure

Page 31. Transportation - Priorities provides several goals, one of which is:

Maintain and expand public transportation to areas of planned higher-density development that provide opportunities to take advantage of the efficiencies of mass transit in ways that support residential and non-residential development consistent with the Policy Objectives of the Planning Areas.

Clarification is needed on what "planned higher-density development" includes. Is it a specific density range or just above the average permitted density in a municipality? The Borough has two Overlay Zones near the train station, which permit residential uses above the ground floor at densities of 12 and 15 units per acre. Would this be considered "higher-density"?

Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Revitalization and Recentering

Page 36. The Goals section states, "There are also vast auto-oriented areas of New Jersey particularly along highway corridors and major arterials that need reinvestment to make them less auto-oriented. Frequently parcels that front the highway corridor have commercial uses that back up into residential neighborhoods but have no walkable access from these neighborhoods. Through selective interventions, these auto-oriented areas may become more compact, walkable communities and acquire more Center-like features over time."

This text describes the existing conditions of the Borough's commercial areas including along Chestnut Ridge Road and Grand Avenue (County Roads). The Borough supports creating a compact, walkable community that is less auto-oriented. However, it is unclear how this would be

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achieved unless the County makes significant investments and corridor enhancements to enable safe pedestrian access along the corridors.

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task.

Page 38 - Recentering Underutilized Developed Areas - Priorities states, "Landscaped buffers common in suburban zoning districts constitute impediments to pedestrian circulation and should be modified to incorporate walking paths as part of every recentering effort."

These buffers, especially around commercial development along the west side of Chestnut Ridge Road and Paragon Drive, are essential to protecting adjacent residents from noise, visual, and privacy impacts of the commercial development. Modifying these buffers could have a negative impact to adjacent residents. The Draft State Plan should be revised to add details on how buffers should be modified, while continuing to provide adequate screening to adjacent residents.

Climate Change

Page 41. Hazard Mitigation – Priorities states, "Promote regional, watershed-level stormwater planning to reduce flooding risks and enhance water quality, prioritizing naturebased infrastructure solutions to manage stormwater and support ecosystem resilience."

The Borough supports this priority. However, clarification is needed on who would be tasked with conducting "regional, watershed-level planning" – the County, each municipality in a watershed, or another entity?

 Page 41. Hazard Mitigation – Priorities states, "Support intergovernmental and community partnerships for comprehensive stormwater modeling to understand cumulative impacts on water systems, downstream communities, and natural habitats."

The Borough supports this priority, but is unclear what entity would be in charge of leading the creation of intergovernmental and community partnerships. The text should be revised to identify the entity responsible for this priority.

 Page 42. Coastal Areas and Riverine Corridors - Priorities states, "Promote smart growth by implementing DEP floodplain regulations."

It is unclear what is meant by this statement. Additional text should be provided to clarify how DEP floodplain regulations promote smart growth in developed towns.

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 Page 42. Coastal Areas and Riverine Corridors – Priorities states, "Protect vital ecological and special hazard areas such as coastal and riverine high-hazard areas to prevent significant adverse long-term impacts on the natural functions of these sensitive areas."

The Borough supports this priority. However, the Draft State Plan should add details on how to mitigate impacts to existing developed areas in high-hazard areas.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal, and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Borough supports the above goal as written, but encourages the State to reconsider and revise the goals and priorities listed for housing.

- Page 44. Habitat Preservation and Restoration Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."
 - As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance. This appears to be an unfunded State mandate.
- Pages 46. Water Quality Priorities states, "Encourage regional flood and stormwater management planning and implementation, where appropriate, and support the creation of regional control facilities... Require new development to reduce peak runoff rate to prevent increases in flooding and damage to stream corridors..."
 - Clarification should be given as to what entity would be in charge of managing "regional flood and stormwater management planning and implementation." The text should be supplemented to indicate the responsible entity.
- Page 47. Water Quality Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands,

Project No. MPP-001 April 22, 2025 Page 7 | 10



reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Borough supports this priority, but it is unclear what entity is charged with these actions. The text should be supplemented to indicate the responsible entity.

Page 47. Water Quality – Priorities states, "Consistent with state mandates to reduce the risk of flooding, recognize areas that are prone to flooding now and in the future, including but not limited to Flood Hazard Areas (as determined by DEP), of less than one square mile as Critical Environmental Sites. This will bring planning and protection efforts, such as the implementation of minimum flood protection standards, into alignment."

It appears the areas adjacent to the Borough's C1 streams and within the 100-year flood zone would qualify as a Critical Environmental Site. However, the Interactive Locator Map designates this area in the Metropolitan Planning Area (PA1). It is unclear what entity is responsible for determining Critical Environmental Sites and how the Borough could modify the Locator map to identify these areas.

Historic and Scenic Resources

 Page 53. Open Space and Recreational Resources – Priorities states, "Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents."

The Borough supports this priority and encourages the State to provide funding to aid in parkland development and facility upgrades.

Chapter C. State Plan Policy Map

- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Draft State Plan should be supplemented with a copy of the State Plan Policy Map.
- Based on the Interactive Locator Map, Montvale is entirely within the Metropolitan Planning Area.
 We offer the following comments regarding the Borough's Planning Area designation:
 - Metropolitan Planning Area (PA1)

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- Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." The Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. The Borough of Montvale only has a population of 8,625 people according to the 2023 ACS, which does not meet the guiding criteria. However, this equates to a population density of 2,140 people per square mile, which meets the guiding criteria. Additionally, the Borough has access to existing public water and sewer systems and contains a train station. However, no bus routes are available. Therefore, it appears that the Borough meets the guiding criteria for a PA1 designation, except for the minimum population size. Montvale is not "metropolitan" in character, nor does it desire to become so. The Borough is suburban in nature and believes it should be reclassified to Suburban Planning Area (PA2) as the intents of the Draft State Plan for PA2 areas better relate to the existing conditions of the Borough.
- Designating Montvale as PA1 is encouraging overdevelopment of the community. This classification undermines the Borough's master plan documents, zoning ordinance, and planning goals. A population of 25,000+ residents would necessitate significant infrastructure upgrades and place considerable strain on the Borough's transportation network, public services, and school system. The designation of Montvale as PA1 does not account for these challenges and impacts. Instead said designation has been blindly assigned to the Borough without local input.
- Moreover, as noted above, the Borough contains several environmental features including C1 streams and associated 300-foot buffers, wetlands and associated transition areas, and areas within the 100-year flood zone. These environmentally sensitive areas should be revised to the Environmentally Sensitive Planning Area (PA5).

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Montvale takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level. It is unclear how a municipality would be determined to "lack resources" and who would make the determination.

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General Comments

- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.
- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.
- The Draft State Plan presents multiple internal inconsistencies, specifically between the protection of natural resources and limitation of land disturbance, and the evident prioritization of residential development. The Draft Plan appears to suggest that the need for additional housing outweighs other important planning considerations, including environmental protection. Thoughtful planning at the State level must seek a balance between preservation and development, otherwise the Draft State Plan will cause a series of unintended consequences that will be difficult to rectify and unsustainable over the long-term. The Borough strongly encourages the Draft State Plan to be reviewed and redrafted to balance preservation/conservation with development.
- The Draft State Plan proposes several goals. However, it is unclear if certain goals are prioritized over others. For example, does the Housing Goal to provide more housing supersede the goal related to Natural and Water Resources (protect, maintain, restore the state's natural and water resources/ecosystems)?
- The above two goals are in direct conflict with one another. This conflict has been and will continue to be problematic for towns as they are forced to develop and redevelop areas and simultaneously protect sensitive environmental areas. The State must revisit the goals and prioritize them so it is clear when a conflict arises which goal prevails.

Map Changes

- The State Plan Policy Map should be enhanced with an overlay for flood hazard areas to recognize the danger stream corridors face.
- Montvale requests that the Borough's designation of PA1 be amended to PA5 for areas containing environmental features, including C1 streams, wetlands, required buffers, and within the 100-year flood zone to encourage the protection of these environmental resources.
- Montvale requests that its designation of PA1 be amended to PA2 outside of the aforementioned environmental features. PA2 reflects the Borough's existing conditions and planning goals.
 Designating Montvale as PA1 is encouraging overdevelopment of the community. This classification undermines the Borough's master plan documents, zoning ordinance, and planning goals.

Project No. MPP-001 April 22, 2025 Page 10 | 10



The Borough of Montvale strongly encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Montvale welcomes a meeting to discuss the requested State Plan Policy Map modifications.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Borough Planner

cc: Joseph Voytus, Borough Business Administrator (via email <u>jvoytus@montvaleboro.org</u>)
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Via Email: stateplan.comments@sos.gov April 10, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of Holland, Hunterdon County
Project No. HLP-001A

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of Holland, Hunterdon County. Holland Township submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary provides an overview of the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

This goal appears to contradict the Natural and Water Resources Goals and Priorities, which focus on preservation. Additionally, this text appears to be blind to the Highlands Region, which is a sensitive environmental area, within which certain sub-zones are encouraged to be preserved and/or have limited development.

Page 13. Historic and Scenic Resources is another one of the State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Township supports this statement and encourages public access to the Township's State, County, Municipal, and privately owned open spaces.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Economic Development

 Page 21. Sustainable and Inclusive Development - Priorities states, "Encourage economic development and employment opportunities that enhance the viability of agriculture, retain, Project No. HLP-001A April 10, 2025 Page 2 | 7



and expand key services and industries that underpin our agricultural sector, such as regional food hubs, food processing facilities, agricultural equipment suppliers, and urban agriculture, as an industry."

The Township supports this priority. However, clarification should be provided on how the State would encourage expansion of "regional food hubs, food processing facilities, agricultural equipment suppliers." Would grants or other funding be provided for municipalities to promote this kind of economic development?

Housing

Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints. This is especially important in a community like Holland which has limited water and sewer service areas. Furthermore, the entire Township is located within the Highlands Region, which provides drinking water to more than 70% of New Jersey residents. Within the Highlands Region, development is limited due to key natural resources and, as a result, this goal should be revised to encourage inclusionary zoning in areas with water and sewer and outside of environmentally constrained regions.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

The Township of Holland does not have access to public transportation options. The Plan does not provide a separate housing goal oriented towards communities lacking public transportation. Clarification should be provided on the goal for housing development in these areas.

Additionally, this is the first mention of the term "accessory dwellings" in the State Plan. It is mentioned throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."

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No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place in Holland for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.

 Page 26. Housing as a Catalyst for Economic Development - Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text: "In areas where water and wastewater infrastructure is available and capacity remains...."

Additionally, the Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

Page 26. Housing as a Catalyst for Economic Development – Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. Furthermore, communities within the Highlands Region must abide by the Highlands Regional Master Plan and cannot up-zone in non-sewered areas. The above-quoted text should be rewritten to address these issues.

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Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined.

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Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

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Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written, but believes the State should reconsider and revise the goals and priorities listed for housing.

Page 43. The Goals section prioritizes farmland preservation as a strategic investment and states, "The State and local communities should protect the long-term viability of the agricultural industry, preserve land to mitigate climate change impacts through carbon sequestration and improved land management practices, and foster local food production to address food insecurity and promote healthy communities. Preserving farmland also contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities."

The Township supports this goal. However, preserved land reduces property taxes collected by municipalities. While the Township supports farmland preservation, too much preservation could cause financial issues. The State should consider programs that would offset the reduced property taxes so towns can continue to support the preservation of land without undermining their tax base.

- Page 44. Habitat Preservation and Restoration Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."
 - As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.
- Page 47. Water Quality Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

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The Township supports this priority, but it is unclear what entity is charged with these actions.

Historic and Scenic Resources

- Page 53. Open Space and Recreational Resources Priorities includes the following:
 - o Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents.
 - Connect large contiguous tracts of forest, grasslands, and other natural lands with stream and river corridors through greenways to provide maximum connectivity and enhance their functional integrity and biological diversity.
 - Protect the scenic qualities of forested areas that are visible from public roads, trails, and waterways from visually intrusive land uses, and preserve them through invasive species control, setbacks and other scenic corridor maintenance measures.

The Township supports these priorities and encourages the State to provide funding to aid in parkland acquisition and the protection of scenic resources.

2024 Comprehensive Planning

Pages 61 and 62. Regional Planning and Areas of Critical State Concern. This section recognizes that the State Planning Act does not acknowledge the Highlands Water Protection and Planning Act but "...should treat the Highlands Region and the Highlands Regional Master Plan with the same deference as the Special Resources Areas that are named in the State Planning Act." (Pinelands National Reserve and Hackensack Meadowlands District). Additional areas of concern to be considered in the future also include the Skylands Region, of which the Township is a part.

Statement of fact, not a comment, Holland Township is entirely located within the New Jersey Highlands Region.

Page 64. New Jersey Highlands - Priorities section indicates the State Plan must recognize
the need for the Highlands Region to be considered differently from the rest of New Jersey in
terms of land use planning and agency collaboration and coordination.

The Township agrees with the above statement, but it is unclear from the report if the Draft State Plan is irrelevant for communities located in the Highlands Region. Said differently, are communities within the Highlands Region required to conform to the Draft State Plan and the Highlands Regional Master Plan? Or are Highlands communities solely mandated to conform to the Highlands Regional Master Plan? The Draft State Plan should be revised to address this question.

Chapter C. State Plan Policy Map

 Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas Project No. HLP-001A April 10, 2025 Page 6 | 7



(1 – 5). However, the bottom of page 68 states, "The State Plan Policy Map applies to all lands except... lands that are subject to the jurisdiction of the various regional planning entities created by the State or the Federal government."

We would recommend a sentence be added to direct communities within a regional planning area to refer to the applicable regional planning agency mapping. Hyperlinks would be useful for citizens and practitioners to easily source this information.

- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d1234

 26c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Plan should be supplemented with a copy of the State Plan Policy Map.
- The linked map above does not provide any designation for Holland Township. As Holland is fully conforming with the Highlands Regional Master Plan, the Highlands Land Use Capability Zones should be the State Plan layers illustrated for Holland.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Holland Township takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. Is the Draft State Plan suggesting municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level? How would a municipality be determined to "lack resources" and who would make this determination?

General Comments

It is unclear throughout the report what goal/priority is implemented by the State, the County, the municipality, or the private sector. The text should be clarified, or a matrix provided in the appendix.



- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.
- The Draft State Plan proposes several goals. However, it is unclear if certain goals are prioritized over others. For example, does the Housing Goal to provide more housing supersede the goal related to Natural and Water Resources (protect, maintain, restore the state's natural and water resources/ecosystems)? The two aforementioned goals are in direct conflict with one another. This conflict has been, and will continue to be, problematic for towns within the Highlands Region. The Highlands Region provides drinking water to more than half of New Jersey's families, but there is nothing in the Draft State Plan to prioritize water quality and quantity within the Highlands ahead of overdevelopment. Holland urges the State to prioritize the goals.
- The Draft State Plan is general and broad, which is understandable to a degree. However, there are no specific goals and/or priorities for the unique state planning regions, such as the Highlands Region. All the goals are one-size-fits-all generic and blind to sensitive areas, such as the Preservation Area within the Highlands Region. Holland encourages the State to revisit the goals and consider preparing goals specifically for the Highlands Region.

Map Changes

As Holland is fully conforming to the Highlands Regional Master Plan, the State Plan Policy Map should be revised to illustrate the Highlands Land Use Capability Zones for the Township.

The Township of Holland encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Holland Township welcomes a meeting to discuss the requested State Plan Policy Map amendment.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dulu a. Sleen

Township Planner

cc: Dan Bush, Mayor (via email <u>d.bush@hollandtownship.org</u>)
Scott Wilhelm, Township Committee (via email <u>s.wilhelm@hollandtownship.org</u>)
Maria Elena Kozak, Land Use Administrator (via email <u>planningboard@hollandtownship.org</u>)



Via Email: stateplan.comments@sos.nj.gov April 8, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of Mahwah, Bergen County

Project No. MWT-001D

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of Mahwah, Bergen County. Mahwah submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

This goal seems to contradict the Natural and Water Resources Goals and Priorities, which focus on preservation. Additionally, this text appears to be blind to the Highlands Region, which is a sensitive environmental area, within which certain sub-zones are encouraged to be preserved and/or have limited development.

Mahwah also seeks clarification of the statement "provide for a proportional increase in housing". What does proportional mean?

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary

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zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints. Why would the Draft State Plan ignore such an important factor that affects all types of development within the State?

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

This is the first mention of the term "accessory dwellings" in the Draft State Plan. It is mentioned throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."

No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided. It is unclear, as written, if this is an attempt to undermine home rule.

Page 26. Housing as a Catalyst for Economic Development – Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text, "In areas where water and wastewater infrastructure is available and capacity remains...." The Draft State Plan also does not provide guidance on how to accommodate new development with limited water and/or sewer capacity or in areas without utility infrastructure. Clarification should be provided. Finally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

 Page 26. Housing as a Catalyst for Economic Development - Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for Project No. MWT-001D April 8, 2025 Page 3 | 7



development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. Furthermore, communities within the Highlands Region must abide by the Highlands Regional Master Plan and cannot up-zone in non-sewered areas. The above-quoted text should be rewritten to address these issues.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined.

It is unclear how this priority is to be achieved as the private sector determines what housing types are profitable. Furthermore, towns are precluded from zoning for tenure. Unless the State is going to financially incentivize these types of housing units, it is unclear who will pay for these units. Is the Draft State Plan suggesting existing residents subsidize this construction?

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive". This appears to be an attempt to undermine home rule.

 Page 29. Housing and Transportation - Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Transportation

Page 31. Transportation Goal, Transportation – Priorities provides three goals, one of which is:

Maintain and expand public transportation to areas of planned higher-density development that provide opportunities to take advantage of the efficiencies of mass

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transit in ways that support residential and non-residential development consistent with the Policy Objectives of the Planning Areas.

Clarification is needed on what "planned higher-density development" includes. Is it a specific density range or just above the average permitted density in a municipality?

Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality?

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written, but believes the State should reconsider and revise the goals and priorities listed for housing.

Page 44. Habitat Preservation and Restoration – Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance. This appears to be an unfunded State mandate.

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Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Township supports this priority, but it is unclear what entity is charged with these actions.

Historic and Scenic Resources

 Page 53. Open Space and Recreational Resources – Priorities states, "Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents."

The Township supports this priority and encourages the State to provide funding to aid in parkland acquisition and facility upgrades.

2024 Comprehensive Planning

Pages 61 and 62. Regional Planning and Areas of Critical State Concern. This section recognizes that the State Planning Act does not acknowledge the Highlands Water Protection and Planning Act but "...should treat the Highlands Region and the Highlands Regional Master Plan with the same deference as the Special Resources Areas that are named in the State Planning Act." (Pinelands National Reserve and Hackensack Meadowlands District). Additional areas of concern to be considered in the future also include the Skylands Region, of which the Township is a part.

Statement of fact, not a comment, Mahwah is entirely located within the New Jersey Highlands Region.

Page 64. New Jersey Highlands – Priorities section indicates the State Plan must recognize
the need for the Highlands Region to be considered differently from the rest of New Jersey in
terms of land use planning and agency collaboration and coordination.

The Township agrees with the above statement, but it is unclear from the report if the Draft State Plan is irrelevant for communities located in the Highlands Region. Said differently, are communities within the Highlands Region required to conform to the Draft State Plan and the Highlands Regional Master Plan? Or are Highlands communities solely mandated to conform to the Highlands Regional Master Plan?

Chapter C. State Plan Policy Map

Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 – 5). However, the bottom of page 68 states, "The State Plan Policy Map applies to all

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lands except... lands that are subject to the jurisdiction of the various regional planning entities created by the State or the Federal government."

We would recommend a sentence be added to direct communities within a regional planning area to refer to the applicable regional planning agency mapping. Hyperlinks would be useful for citizens and practitioners to easily source this information.

- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Plan should be supplemented with a copy of the State Plan Policy Map.
- The linked map above does not provide any designation for Mahwah Township. As Mahwah is fully conforming with the Highlands Regional Master Plan, the Highlands Land Use Capability Zones should be the State Plan layers illustrated for Mahwah.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Mahwah takes exception with the above statement. Is the Draft State Plan suggesting municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level? How would a municipality be determined to "lack resources" and who would make this determination?

General Comments

It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.



- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.
- The Draft State Plan proposes several goals. However, it is unclear if certain goals are prioritized over others. For example, does the Housing Goal to provide more housing supersede the goal related to Natural and water Resources (protect, maintain, restore the state's natural and water resources/ecosystems)?
- The two above goals are in direct conflict with one another. This conflict has been and will continue to be problematic for towns within the Highlands Region. The Highlands Region provides drinking water to more than half of New Jersey's families. Yet there is nothing in the Draft State Plan to prioritize water quality and quantity within the Highlands ahead of overdevelopment.
- The Draft State Plan is general and broad, which is understandable to a degree. However, there are no specific goals and/or priorities for the unique state planning regions, such as the Highlands Region. All the goals are one-size-fits-all generic and blind to sensitive areas, such as the Preservation Area within the Highlands Region.

Map Changes

As Mahwah is fully conforming to the Highlands Regional Master Plan, the State Plan Policy Map should be revised to illustrate the Highlands Land Use Capability Zones for the Township.

The Township of Mahwah encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Mahwah welcomes a meeting to discuss the requested State Plan Policy Map.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Township Planner

cc: Benjamin Kezmarsky, Business Administrator (via email <u>bkezmarsky@mahwahtwp.org</u>)
David May, Council Member (via email dmay@mahwahtwp.org)



Via Email: stateplan.comments@sos.nj.gov April 2, 2025

Department of State Office of Planning Advocacy PO Box 300 Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Borough of Woodland Park, Passaic County Project No. WDB-001

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Borough of Woodland Park, Passaic County. Woodland Park submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

This goal seems to contradict the Natural and Water Resources Goals and Priorities, which focuses on preservation. Additionally, this text appears to be blind to sensitive environmental features including streams, wetlands, riparian zones, steep slopes, and flood prone areas. The Borough contains many areas of steep slopes and much of the southwestern corner of the Borough is located within a flood zone.

Woodland Park also seeks clarification of the statement "provide for a proportional increase in housing". What does proportional mean? The statement should be quantified.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

 Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population Project No. WDB-001 April 2, 2025 Page 2 | 8



growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

The Borough of Woodland Park has limited access to public transportation with one bus route along McBride Avenue and Browertown Road. The Draft State Plan does not provide a separate housing goal oriented towards communities lacking public transportation. Clarification should be provided on the goal for housing development in areas lacking public transportation.

This is the first mention of the term "accessory dwellings" in the Draft State Plan. It is mentioned throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."

No examples are provided on what type of zoning would be considered inconsistent with the Draft State Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.

 Page 26. Housing as a Catalyst for Economic Development - Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text "In areas where water and wastewater infrastructure is available and capacity remains...." The Draft State Plan also does not provide guidance on how to accommodate new development with limited water and/or sewer capacity or in areas without utility infrastructure. Clarification should be provided. Finally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

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Page 26. Housing as a Catalyst for Economic Development - Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. A definition should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined.

It is unclear how this priority is to be achieved as the private sector determines what housing types are profitable. Furthermore, towns are precluded from zoning for tenure. Unless the State is going to financially incentivize these types of housing units it is unclear who will pay for these units. Is the Draft State Plan suggesting existing residents subsidize this construction?

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

 Page 29. Housing and Transportation – Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

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Most of the southwestern quadrant of the Borough is within FEMA's 100-year flood zone. This area contains a variety of uses including residential, commercial, and industrial uses. It is unclear how these recommendations would be enforced. Who would be responsible for preparing evacuation plans? Who would be responsible for requiring building and flood insurance?

It is unclear if the last sentence applies to new construction, additions, or certain types of renovations. The text should be clarified. Additionally, an explanation is needed on what "systems" need to be elevated.

Infrastructure

Pages 33 and 34. Clean Energy - Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes. Is it a specific density range or just above the average permitted density in a municipality?

The Draft Plan mentions "clean energy" 11 times but does not define what "clean energy" is. A definition should be added to the glossary.

Revitalization and Recentering

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The text should be clarified as to the responsible entity.

Climate Change

Page 41. Hazard Mitigation – Priorities states, "Promote regional, watershed-level stormwater planning to reduce flooding risks and enhance water quality, prioritizing naturebased infrastructure solutions to manage stormwater and support ecosystem resilience."

The Borough supports this priority. However, clarification is needed on who would be tasked with conducting "regional, watershed-level planning" – the County, each municipality in a watershed, or another entity? The text should be supplemented to indicate the responsible entity. The State should note that this planning is already included in Woodland Park's FEMA and Stormwater Management Ordinance.

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- Page 41. Hazard Mitigation Priorities states, "Support intergovernmental and community partnerships for comprehensive stormwater modeling to understand cumulative impacts on water systems, downstream communities, and natural habitats."
 - The Borough supports this priority, but is unclear what entity would be in charge of leading the creation of intergovernmental and community partnerships? The text should be supplemented to indicate the responsible entity.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Promote smart growth by implementing DEP floodplain regulations."
 - It is unclear what is meant by this statement. Additional text should be provided to clarify how DEP floodplain regulations promote smart growth in developed towns.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Protect vital ecological and special hazard areas such as coastal and riverine high-hazard areas to prevent significant adverse long-term impacts on the natural functions of these sensitive areas."

The Borough supports this priority. However, the portion of the Borough within the 100-year flood zone is developed. The Draft State Plan should add details on how to mitigate impacts to existing developed areas in high-hazard areas.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal, and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Borough supports the above goal as written, but believes the State should reconsider and revise the goals and priorities listed for housing.

 Page 44. Habitat Preservation and Restoration - Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

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- Page 46. Water Quality Priorities states, "Encourage regional flood and stormwater management planning and implementation, where appropriate, and support the creation of regional control facilities..."
 - Clarification should be given as to what entity would be in charge of managing "regional flood and stormwater management planning and implementation." The text should be supplemented to indicate the responsible entity.
- Page 47. Water Quality Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Borough supports this priority, but it is unclear what entity is charged with these actions. The text should be supplemented to indicate the responsible entity.

Furthermore, the Department of Community Affairs identified the land surrounding the two drinking water reservoirs within Woodland Park as developable as part of their calculation of the Fourth Round affordable housing obligations. The inclusion of these sites as developable conflicts with this priority.

Page 47. Water Quality - Priorities states, "Consistent with state mandates to reduce the risk of flooding, recognize areas that are prone to flooding now and in the future, including but not limited to Flood Hazard Areas (as determined by DEP), of less than one square mile as Critical Environmental Sites. This will bring planning and protection efforts, such as the implementation of minimum flood protection standards, into alignment."

Most of the Borough's southwestern area is within FEMA's 100-year flood zone. This area is less than one square mile and is mostly developed with residential and non-residential uses. This area appears to qualify as a "Critical Environmental Site". However, limited information is provided on how this designation is obtained and what other characteristics (other than being in a flood hazard area) are required. The text should be enhanced to describe a "Critical Environmental Site" and what benefit, if any, a town would gain from such a designation.

Chapter C. State Plan Policy Map

- Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 5).
- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.

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- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d1234

 <a href="https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d
- Based on the Interactive Locator Map, Woodland Park is entirely within the Metropolitan Planning
 Area. We offer the following comments regarding the Borough's Planning Area designation:
 - o Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." The Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. A majority of Woodland Park appears to fit this criteria.
 - O However, the Borough is home to two Passaic County Parks, Garret Mountain Reservation in the northeast corner and Rifle Camp Park in the southeast corner. Additionally, the Borough contains two reservoirs owned and operated by the Passaic Valley Water Commission, New Street reservoir in the north and Great Notch Reservoir in the southeast. It is unclear why the County Parks and lands essential to the drinking water reservoirs were included in the PA1 designation. The Borough believes these areas should be revised to Environmentally Sensitive Planning Area (PA5) and/or Parks, Open Space, and Natural Areas to better reflect their characteristics.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Woodland Park takes exception with the above statement. New Jersey is a home rule State and local zoning is enabled through the Municipal Land Use Law. The above statement should be deleted from the Draft State Plan. Is the Draft State Plan suggesting municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level? How would a municipality be determined to "lack resources" and who would make this determination?

General Comments

Woodland Park objects to the Draft State Plan as written.



- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.
- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

- The State Plan Policy Map should be enhanced with an overlay for flood hazard areas to recognize the danger stream corridors face.
- The entirety of the Borough is designated PA1. However, the Borough is home to two Passaic County Parks, Garret Mountain Reservation and Rifle Camp Park. Additionally, the Borough contains two reservoirs owned and operated by the Passaic Valley Water Commission, New Street reservoir and Great Notch Reservoir. It is unclear why the County Parks and lands essential to the drinking water reservoirs were included in the PA1 designation. The Borough requests that these areas be revised to Environmentally Sensitive Planning Area (PA5) and/or Parks, Open Space, and Natural Areas to better reflect their characteristics.

The Borough of Woodland Park encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Woodland Park welcomes a meeting to discuss the requested State Plan Policy Map amendment.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dalue a. Sleen

Borough Planner

cc: Sam Yodice, Business Administrator (via email: syodice@wpnj.us)
Allan Burghardt, Construction Official (via email: aburghardt@wpnj.us)
Jason Miranda, Senior Planner, County of Passaic (via email: Jasonmi@passaiccountynj.org)

Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827 Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov

April 1, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of Tewksbury, Hunterdon County
Project No. TBT-001A

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of Tewksbury, Hunterdon County. Tewksbury submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of the goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

This goal seems to contradict the Natural and Water Resources Goals and Priorities, which focus on preservation. Additionally, this text appears to be blind to the Highlands Region, which is a sensitive environmental area, within which certain sub-zones are encouraged to be preserved and/or have limited development. A majority of Tewksbury is within the more restrictive Highlands' subzones (Conservation, Conservation Environmentally Constrained, and Protection Sub-zones) where preservation and conservation are encouraged. The text should be supplemented with a statement that excludes the Highlands Region from the prohibition of concentrated preservation areas.

 Page 13. Historic and Scenic Resources is another one of the State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Township supports this statement and encourages public access to the Township's open spaces.

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Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Economic Development

Page 21. Sustainable and Inclusive Development - Priorities states, "Encourage economic development and employment opportunities that enhance the viability of agriculture, retain, and expand key services and industries that underpin our agricultural sector, such as regional food hubs, food processing facilities, agricultural equipment suppliers, and urban agriculture, as an industry."

The Township supports this priority. However, clarification should be provided on how the State would encourage expansion of "regional food hubs, food processing facilities, agricultural equipment suppliers." Would grants or other funding be available for municipalities to promote this kind of economic development?

Housing

Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands, limit housing development to existing utility constraints, and preclude multi-family development in areas lacking water and sewer infrastructure.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

The Township of Tewksbury does not have access to public transportation options. The Draft State Plan does not provide a separate housing goal oriented toward communities lacking public transportation. Clarification should be provided on the goal for housing development in areas lacking public transportation.

Additionally, this section contains the first mention of the term "accessory dwellings" in the Draft State Plan. It is stated throughout the Housing section; however, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

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- Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."
 - No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."
 - This text should be revised to recognize water and wastewater limitations. Suggested text "In areas where water and wastewater infrastructure is available and capacity remains...." The Draft State Plan also does not provide guidance on how to accommodate new development with limited water and/or sewer capacity or in areas without utility infrastructure. Clarification should be provided. Finally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.
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 - "Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. Furthermore, communities within the Highlands Region must abide by the Highlands Regional Master Plan and cannot up-zone in non-sewered areas. The above-quoted text should be rewritten to address these issues.
- Page 27. Housing Stock Diversity Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."
 - Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined. A definition should be added to the glossary.
- Page 27. Reducing Barriers to Development Priorities states, "Minimize restrictive zoning.
 Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic

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segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Township is traversed by several Category One (C1) streams and their tributaries, including the Boulder Hill Brook, Cold Brook, Frog Hollow Brook, Guinea Hollow Brook, Hollow Brook, Lamington River, North Branch of the Rockaway Creek, and South Branch of the Raritan River. Areas around these streams, particularly along the Lamington River and North Branch of the Rockaway Creek, are within FEMA's 100-year flood zone. Furthermore, the Highlands Open Water Protection Area and Riparian Area encompass substantial land around these resources. It is unclear why the State would encourage housing development within flood prone areas and areas containing numerous environmental resources. The Township would suggest the opposite — discourage and or preclude new housing development within areas with a higher flood risk.

Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? It is also unclear what "systems" need to be elevated and the type of construction that would trigger this requirement. Would it be an addition, a new home or something else? Finally, the text should be supplemented with the entity responsible for implementing the identified tasks.

Revitalization and Recentering

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task. Additionally, Tewksbury does not have access to public transportation options and has limited water and sewer infrastructure. Are new centers only identified in areas with these facilities? Clarification should be provided.

Climate Change

Page 41. Hazard Mitigation – Priorities states, "Promote regional, watershed-level stormwater planning to reduce flooding risks and enhance water quality, prioritizing naturebased infrastructure solutions to manage stormwater and support ecosystem resilience." Project No. TBT001A April 1, 2025 Page 5 | 9



The Township supports this priority. However, clarification is needed on who would be tasked with conducting "regional, watershed-level planning" – the County, each municipality in a watershed, or another entity?

- Page 41. Hazard Mitigation Priorities states, "Support intergovernmental and community partnerships for comprehensive stormwater modeling to understand cumulative impacts on water systems, downstream communities, and natural habitats."
 - The Township supports this priority but is unclear what entity would be in charge of leading the creation of intergovernmental and community partnerships. The text should be revised to identify the entity responsible for this priority.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Promote smart growth by implementing DEP floodplain regulations."
 - It is unclear what is meant by this statement. Additional text should be provided to clarify how DEP floodplain regulations promote smart growth along river corridors.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Protect vital ecological and special hazard areas such as coastal and riverine high-hazard areas to prevent significant adverse long-term impacts on the natural functions of these sensitive areas."

The Township supports this priority. However, it is unclear how this priority will be achieved. Will the State adopt regulations precluding development in the identified areas? The text should be supplemented with specific actions.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written but encourages the State to reconsider and revise the goals and priorities listed for housing.

Page 43. The Goals section prioritizes farmland preservation as a strategic investment and states, "The State and local communities should protect the long-term viability of the agricultural industry, preserve land to mitigate climate change impacts through carbon sequestration and improved land management practices, and foster local food production to Project No. TBT001A April 1, 2025 Page 6 | 9



address food insecurity and promote healthy communities. Preserving farmland also contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities."

The Township supports this goal. However, preserving farmland can reduce property taxes, which can financially impact municipalities and their school districts. While the Township supports farmland preservation, too much preservation could cause financial issues. Clarification should be provided on how financial impacts of additional preserved farmland can be mitigated or other incentives created by the State to aid municipalities in the preservation of farmland.

Page 44. Habitat Preservation and Restoration – Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

- Page 45. Agricultural and Food Production Priorities discuss farmland preservation and indicate preservation can achieve many objectives including:
 - Maintaining the long-term viability of the agricultural industry,
 - Utilizing preserved land to mitigate climate change impacts through carbon sequestration and improved land management practices, and
 - Fostering local food production to address food insecurity and promote healthy communities. Additionally, preserving farmland contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities.

The Township supports this priority and its objectives. However, clarification should be provided on what the statement "improved land management practices" means and who is responsible - the State, County, Municipality, or property owner?

Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Township supports this priority, but it is unclear what entity is charged with these actions.

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Historic and Scenic Resources

- Page 53. Open Space and Recreational Resources Priorities include the following:
 - o Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents.
 - Connect large contiguous tracts of forest, grasslands, and other natural lands with stream and river corridors through greenways to provide maximum connectivity and enhance their functional integrity and biological diversity.
 - Protect the scenic qualities of forested areas that are visible from public roads, trails, and waterways from visually intrusive land uses, and preserve them through invasive species control, setbacks and other scenic corridor maintenance measures.

The Township supports this priority and encourages the State to provide funding to aid in parkland acquisition and development as well as facility upgrades.

2024 Comprehensive Planning

Pages 61 and 62. Regional Planning and Areas of Critical State Concern. This section recognizes that the State Planning Act does not acknowledge the Highlands Water Protection and Planning Act but "...should treat the Highlands Region and the Highlands Regional Master Plan with the same deference as the Special Resources Areas that are named in the State Planning Act." (Pinelands National Reserve and Hackensack Meadowlands District). Additional areas of concern to be considered in the future also include the Skylands Region, of which the Township is a part.

Statement of fact, not a comment, Tewksbury is entirely located within the New Jersey Highlands Region.

Page 64. New Jersey Highlands - Priorities section indicates the State Plan must recognize
the need for the Highlands Region to be considered differently from the rest of New Jersey in
terms of land use planning and agency collaboration and coordination.

The Township agrees with the above statement, but it unclear from the report if the Draft State Plan is irrelevant for communities located in the Highlands Region. Said differently, are communities within the Highlands Region required to conform to the Draft State Plan and the Highlands Regional Master Plan? Or are Highlands communities solely mandated to conform to the Highlands Regional Master Plan? The Draft State Plan should be revised to address this question.

Chapter C. State Plan Policy Map

Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 - 5). However, the bottom of page 68 states, "The State Plan Policy Map applies to all

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lands except... lands that are subject to the jurisdiction of the various regional planning entities created by the State or the Federal government."

Tewksbury recommends a sentence be added to direct communities within a regional planning area to refer to the applicable regional planning agency mapping. Hyperlinks would be useful for citizens and practitioners to easily source this information.

- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Plan should be supplemented with a copy of the State Plan Policy Map.
- The linked map above does not provide any designation for the Township of Tewksbury. As Tewksbury is fully conforming with the Highlands Regional Master Plan, the Highlands Land Use Capability Zones should be the State Plan layers illustrated for Tewksbury.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Tewksbury takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level.

General Comments

It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.



The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

• As Tewksbury is fully conforming to the Highlands Regional Master Plan, the State Plan Policy Map should be revised to illustrate the Highlands Land Use Capability Zones for the Township.

The Township of Tewksbury encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns.

Sincerely,

Colliers Engineering & Design, Inc.

Dalu a. Bleen

Darlene A. Green, P.P., AICP

Township Planner

cc: Shana Goodchild, Township Administrator (via email <u>slgoodchild@tewksburytwp.net</u>)

Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827 Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov

April 1, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

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Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

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 Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic

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segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

Page 29. Health and the Environment - Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Township is traversed by several Category One (C1) streams and their tributaries, including the Boulder Hill Brook, Cold Brook, Frog Hollow Brook, Guinea Hollow Brook, Hollow Brook, Lamington River, North Branch of the Rockaway Creek, and South Branch of the Raritan River. Areas around these streams, particularly along the Lamington River and North Branch of the Rockaway Creek, are within FEMA's 100-year flood zone. Furthermore, the Highlands Open Water Protection Area and Riparian Area encompass substantial land around these resources. It is unclear why the State would encourage housing development within flood prone areas and areas containing numerous environmental resources. The Township would suggest the opposite — discourage and or preclude new housing development within areas with a higher flood risk.

Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? It is also unclear what "systems" need to be elevated and the type of construction that would trigger this requirement. Would it be an addition, a new home or something else? Finally, the text should be supplemented with the entity responsible for implementing the identified tasks.

Revitalization and Recentering

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task. Additionally, Tewksbury does not have access to public transportation options and has limited water and sewer infrastructure. Are new centers only identified in areas with these facilities? Clarification should be provided.

Climate Change

Page 41. Hazard Mitigation – Priorities states, "Promote regional, watershed-level stormwater planning to reduce flooding risks and enhance water quality, prioritizing naturebased infrastructure solutions to manage stormwater and support ecosystem resilience." Project No. TBT001A April 1, 2025 Page 5 | 9



The Township supports this priority. However, clarification is needed on who would be tasked with conducting "regional, watershed-level planning" – the County, each municipality in a watershed, or another entity?

 Page 41. Hazard Mitigation - Priorities states, "Support intergovernmental and community partnerships for comprehensive stormwater modeling to understand cumulative impacts on water systems, downstream communities, and natural habitats."

The Township supports this priority but is unclear what entity would be in charge of leading the creation of intergovernmental and community partnerships. The text should be revised to identify the entity responsible for this priority.

 Page 42. Coastal Areas and Riverine Corridors – Priorities states, "Promote smart growth by implementing DEP floodplain regulations."

It is unclear what is meant by this statement. Additional text should be provided to clarify how DEP floodplain regulations promote smart growth along river corridors.

 Page 42. Coastal Areas and Riverine Corridors - Priorities states, "Protect vital ecological and special hazard areas such as coastal and riverine high-hazard areas to prevent significant adverse long-term impacts on the natural functions of these sensitive areas."

The Township supports this priority. However, it is unclear how this priority will be achieved. Will the State adopt regulations precluding development in the identified areas? The text should be supplemented with specific actions.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written but encourages the State to reconsider and revise the goals and priorities listed for housing.

Page 43. The Goals section prioritizes farmland preservation as a strategic investment and states, "The State and local communities should protect the long-term viability of the agricultural industry, preserve land to mitigate climate change impacts through carbon sequestration and improved land management practices, and foster local food production to Project No. TBT001A April 1, 2025 Page 6 | 9



address food insecurity and promote healthy communities. Preserving farmland also contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities."

The Township supports this goal. However, preserving farmland can reduce property taxes, which can financially impact municipalities and their school districts. While the Township supports farmland preservation, too much preservation could cause financial issues. Clarification should be provided on how financial impacts of additional preserved farmland can be mitigated or other incentives created by the State to aid municipalities in the preservation of farmland.

Page 44. Habitat Preservation and Restoration – Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

- Page 45. Agricultural and Food Production Priorities discuss farmland preservation and indicate preservation can achieve many objectives including:
 - Maintaining the long-term viability of the agricultural industry,
 - Utilizing preserved land to mitigate climate change impacts through carbon sequestration and improved land management practices, and
 - Fostering local food production to address food insecurity and promote healthy communities. Additionally, preserving farmland contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities.

The Township supports this priority and its objectives. However, clarification should be provided on what the statement "improved land management practices" means and who is responsible - the State, County, Municipality, or property owner?

Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Township supports this priority, but it is unclear what entity is charged with these actions.

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Historic and Scenic Resources

- Page 53. Open Space and Recreational Resources Priorities include the following:
 - Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents.
 - Connect large contiguous tracts of forest, grasslands, and other natural lands with stream and river corridors through greenways to provide maximum connectivity and enhance their functional integrity and biological diversity.
 - Protect the scenic qualities of forested areas that are visible from public roads, trails, and waterways from visually intrusive land uses, and preserve them through invasive species control, setbacks and other scenic corridor maintenance measures.

The Township supports this priority and encourages the State to provide funding to aid in parkland acquisition and development as well as facility upgrades.

2024 Comprehensive Planning

Pages 61 and 62. Regional Planning and Areas of Critical State Concern. This section recognizes that the State Planning Act does not acknowledge the Highlands Water Protection and Planning Act but "...should treat the Highlands Region and the Highlands Regional Master Plan with the same deference as the Special Resources Areas that are named in the State Planning Act." (Pinelands National Reserve and Hackensack Meadowlands District). Additional areas of concern to be considered in the future also include the Skylands Region, of which the Township is a part.

Statement of fact, not a comment, Tewksbury is entirely located within the New Jersey Highlands Region.

Page 64. New Jersey Highlands - Priorities section indicates the State Plan must recognize
the need for the Highlands Region to be considered differently from the rest of New Jersey in
terms of land use planning and agency collaboration and coordination.

The Township agrees with the above statement, but it unclear from the report if the Draft State Plan is irrelevant for communities located in the Highlands Region. Said differently, are communities within the Highlands Region required to conform to the Draft State Plan and the Highlands Regional Master Plan? Or are Highlands communities solely mandated to conform to the Highlands Regional Master Plan? The Draft State Plan should be revised to address this question.

Chapter C. State Plan Policy Map

Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 – 5). However, the bottom of page 68 states, "The State Plan Policy Map applies to all

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lands except... lands that are subject to the jurisdiction of the various regional planning entities created by the State or the Federal government."

Tewksbury recommends a sentence be added to direct communities within a regional planning area to refer to the applicable regional planning agency mapping. Hyperlinks would be useful for citizens and practitioners to easily source this information.

- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcgis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Plan should be supplemented with a copy of the State Plan Policy Map.
- The linked map above does not provide any designation for the Township of Tewksbury. As Tewksbury is fully conforming with the Highlands Regional Master Plan, the Highlands Land Use Capability Zones should be the State Plan layers illustrated for Tewksbury.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Tewksbury takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level.

General Comments

It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.



The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

• As Tewksbury is fully conforming to the Highlands Regional Master Plan, the State Plan Policy Map should be revised to illustrate the Highlands Land Use Capability Zones for the Township.

The Township of Tewksbury encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns.

Sincerely,

Colliers Engineering & Design, Inc.

Dalu a. Bleen

Darlene A. Green, P.P., AICP

Township Planner

cc: Shana Goodchild, Township Administrator (via email <u>slgoodchild@tewksburytwp.net</u>)

Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov April 1, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of Franklin, Hunterdon County Project No. FKT-001A

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of Franklin, Hunterdon County. Franklin Township submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

 Page 13. Historic and Scenic Resources is another one of the State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Township supports this statement and encourages public access to open spaces within the Township.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Economic Development

Page 21. Sustainable and Inclusive Development - Priorities states, "Encourage economic development and employment opportunities that enhance the viability of agriculture, retain, and expand key services and industries that underpin our agricultural sector, such as regional food hubs, food processing facilities, agricultural equipment suppliers, and urban agriculture, as an industry."

The Township supports this priority. However, clarification should be provided on how the State would encourage expansion of "regional food hubs, food processing facilities, agricultural equipment suppliers." Would grants or other funding be available for municipalities to promote this kind of economic development?

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Housing

Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

The Township of Franklin does not have access to public transportation options. The Draft State Plan does not provide a separate housing goal oriented toward communities lacking public transportation. Clarification should be provided on the goal for housing development in areas lacking public transportation.

Additionally, this is the first mention of the term "accessory dwellings" in the Draft State Plan. It is mentioned throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

- Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."
 - No examples are provided on what type of zoning would be considered inconsistent with the Draft State Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text, "In areas where water and wastewater infrastructure is available and capacity remains...." The Draft State Plan also does not provide guidance on how to accommodate new development with limited water and/or sewer capacity or in areas without utility infrastructure. Clarification should be

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provided. Finally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

Page 26. Housing as a Catalyst for Economic Development - Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. A definition should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined.

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

Infrastructure

Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Page 36. Revitalizing Older Centers - A priority is to "Identify new centers", which states,
 "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity.

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These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written, but believes the State should reconsider and revise the goals and priorities listed for housing.

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The Township supports this goal. However, preserving farmland can reduce property taxes, which can financially impact municipalities and their school districts. While the Township supports farmland preservation, too much preservation could cause financial issues. Clarification should be provided on how financial impacts of additional preserved farmland can be mitigated, or other incentives created by the State to aid municipalities in the preservation of farmland.

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As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

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- Page 45. Agricultural and Food Production Priorities discuss farmland preservation and indicate preservation can achieve many objectives including:
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 - Utilizing preserved land to mitigate climate change impacts through carbon sequestration and improved land management practices, and
 - Fostering local food production to address food insecurity and promote healthy communities. Additionally, preserving farmland contributes to the conservation of biodiversity, protects natural water resources, and helps maintain scenic landscapes, thereby enhancing the overall quality of life for residents and promoting tourism opportunities.

The Township supports this priority and its objectives. However, clarification should be provided on what the statement "improved land management practices" means and who is responsible - the State, County, Municipality, or property owner?

Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Township supports this priority, but it is unclear what entity is charged with these actions.

Historic and Scenic Resources

- Page 53. Open Space and Recreational Resources Priorities include the following:
 - o Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents.
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 - Protect the scenic qualities of forested areas that are visible from public roads, trails, and waterways from visually intrusive land uses, and preserve them through invasive species control, setbacks and other scenic corridor maintenance measures.

The Township supports these priorities and encourages the State to provide funding to aid in parkland acquisition and development as well as facility upgrades.

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Chapter C. State Plan Policy Map

- Page 70. Agriculture and Farmland Preservation. This Policy Objective discusses the importance of guiding development to meet the needs of the agricultural industry, promote urban farming, and to minimize conflicts between farmland retention and development. Additionally, this Policy Objective states, "Promote agritourism that includes wineries, breweries, distilleries, cideries, and facilities that provide auxiliary activities.
 - The Township supports this Policy Objective. However, it is unclear who is tasked with achieving these objectives the State, County, municipality, or a combination of entities? Clarification should be provided.
- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

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- Based on the Interactive Locator Map, Franklin is within three Planning Areas. The list below provides the areas, their location, and comments for each Planning Area:
 - Suburban Planning Area (PA2)
 - The northern-most point of the Township is within the PA2, including the ShopRite and WalMart shopping centers, Hampton Inn, and church.
 - Pages 72 and 73. One of the intents of PA2 is to "Provide for a portion of the state's future growth in compact development and redevelopment." However, the Guiding Criteria of the PA2 includes infrastructure systems that have the capacity to support development that meets the policy objectives of PA2 and more than 1 square mile of land area. The area identified in PA2 does not include any residential development, only a portion has access to a public water system (with a limited remaining capacity), and there is no public transportation available. The area identified as PA2 has finite sewer capacity, which is provided by a neighboring town.

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- Rural/Environmentally Sensitive Planning Area (PA4B)
 - A majority of the Township is within the PA4B. This includes areas generally south of West Sidney Road, Hogback Road, and the Sidney Road/Pittstown Road intersection.
 - Page 74. The intent of PA4B (as well as PA4) is to "Maintain the Environs as large contiguous areas of farmland, open space, and forested areas." The Township supports this Planning Area designation.
- Environmentally Sensitive Planning Area (PA5)
 - The northern quadrant of the Township is within this Planning Area. The area is generally bordered by Sidney Road, Upper Kingtown Road, Sidney School Road, Hogback Road, and the eastern municipal boundary.
 - Page 75. The intents of PA5 includes "Protect environmental resources; protect large and small contiguous areas of land; promote restoring habitats and bio-diversity; accommodate growth only in Centers, confining programmed sewers and public water services to Centers; revitalized cities, towns, and older traditional settlements; and protect, enhance, and diversify the existing character of stable communities." The Township supports this Planning Area designation.

Open Space

- The Locator Map also identifies areas around Capoolong Creek between Lower Landsdown Road in the northeast and Quakertown Road in the southwest as "Open Space". The Township supports this Planning Area designation.
- A majority of the Township is within either PA4B or PA5, which aim to protect farmland, environmental resources, and the character of the existing community. These designations do not appear to support the Housing goals and priorities. In fact, they appear to conflict with the Housing goals and priorities. The Draft State Plan should be amended to provide Housing goals and priorities that fit within the PA4B and PA5 designations.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

Franklin takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. Is the Draft State Plan suggesting municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level? How would a municipality be determined to "lack resources" and who would make this determination?

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General Comments

- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality, or the private sector. The text should be clarified, or a matrix provided in the appendix.
- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

The area of the Township categorized as PA2 is inappropriate. The northern corner of the Township does not have public transit system and limited water and sewer capacity exist. The Township requests this area be changed to Fringe Planning Area (PA3), which better reflects the existing characteristics.

The Township of Franklin encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. Franklin Township welcomes a meeting to discuss the requested State Plan Policy Map amendment.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dulu a. Sleen

Township Planner

cc: Christine Burke, Township Clerk (via email clerk@franklin-twp.org)
Alexa Tarby, Township Committee (via email atarby@franklin-twp.org)



P.O. Box 632, Holmdel, NJ

Citizens for Informed Land Use CILU is a nonpartisan, grass roots Holmdel organization started in 1998 to protect our open space and natural resources.

Over 26 years of existence, we have been successful at various open space preservation initiatives. CILU relies on the protections of land promised in the State Plan and the Holmdel Master Plan. A continued focus of CILU is the protection of the quality and quantity of the drinking water for Holmdel residents and the over 300,000 Monmouth County residents who rely on the water from the Swimming River Reservoir.

First, a major element in the 186 page DRAFT SDRP State Plan Proposed Document strongly supports affordable housing development which is being prioritized in this document with proportionally minimal comment on the environment. This is a very straight forward problematic issue.

The state plan SDRP should mandate all new "Affordable Housing", with its adjusted bonus density, be placed in planning area one or two (PA1 or PA 2.), which has the sewer system and the density of services and transportation,—basically all the infrastructure to support this housing. Perhaps we should say all high density housing, not just affordable should be developed in PA 1 or PA 2.

The state can no longer afford to place high density housing in areas that are critical to the environment, whether they are actual watershed lands such as Colts Neck or Southern Holmdel which are PA4B and PA 5 respectively or even fringe lands that are just simply over aquifer outcroppings, as we have in Holmdel's PA 3 area. The state should look towards something similar to a brown fields application, where all development should be focused, on lands that are previously disturbed in existing in PA1 or PA 2

Second CILU does not want to see any deteriorating changes to the SDRP, current State Plan Policy Map Planning Areas, as they apply to Holmdel and Colts Neck. Holmdel has a vested interest in protecting the watershed of the Swimming River Reservoir, the source of their drinking water. One third of the water supply originates in Holmdel while two-thirds originates in Colts Neck; therefore, Holmdel encourages protecting the current environmentally sensitive designation covering the entire watershed from Holmdel through Colts Neck.(PA 5 (environmentally sensitive) or 4B(rural environmentally sensitive).

Third the mapping of sewer service areas shown on the SDRP m (and particularly in Holmdel), should clearly delineate the location of Existing Sewer Service where pipes are in the ground and clearly differentiate this on the State Plan map from the potential franchise/future sewer service areas which are allocated to sewer service providers such as Bayshore Regional Sewer Authority

The piped in sewerage arriving at these allocated regional sewer service providers will simply end up being thrown into the Atlantic Ocean through the Atlantic Ocean outfall for Monmouth County rather than replenishing our aquifers

The state plan should eliminate as far as practical extension of sewer lines into all environmentally sensitive planning areas. Thereby conserving water necessary for drinking, replenishing our groundwater, and helping the land reabsorb stormwater.

All stream corridors should be clearly avoided. No housing should be allowed to be placed in flood zones or allowed to infringe on category 1 streams, especially the Ramanessein which flows into the Swimming River.

Fourth, CILU strongly supports the concept of the State Plan for protecting sensitive lands and encouraging growth in the appropriately designated lands. According to studies done by Professor David Burchell of Rutgers Bloustein school of Planning and Public Policy, f following the State Plan would reduce water and sewer infrastructure costs to the state by \$500 million, and save municipalities and school districts more than \$100 million a year. It would also save 60,000 acres of land that would otherwise have been developed from 2008 to 2028

The 60,000 acres of land saved by adhering to the State Plan would include 17,000 acres of the agricultural lands that help rank New Jersey as a leading producer of a surprisingly wide variety of <u>fruits and vegetables</u>. At the recent rate of 15,000 acres of new development per year, the total land savings translate to a 20 percent

reduction in land consumption over the next 20 years As the state with the most impervious coverage per square mile in the Union, New Jersey can no longer afford to diminish its limited amount of critical land that still naturally absorbs our stormwater runoff and recharges our groundwater.

The state plan SDRP should mandate keeping existing forest and fields in their current state and not develop this land.

The State Planning Commission is commended for their emphasis on pages 46 and 47 to institute a watershed-based resource planning and permitting program to address sustainability of ground and surface water, to protect water quality, and to prevent further contamination of ground and surface waters. Over 26 years CILU, Citizens for Informed Land Use, has advocated for informed decision making in planning development. The State Plan is an important component of informing that decision making and the emphasis should be on protecting environmentally sensitive lands.

Sincerely,

CILU Board

Presented by Karen Strickland

VP for Research



March 25th, 2025

New Jersey State Planning Commission

NJ Department of State

P.O. Box 500

Trenton, NJ 08625-0500

Attention: Executive Director, Walter C. Lane

Dear Members of the New Jersey State Planning Commission and Staff,

Thank you to the hardworking staff of the New Jersey Department of State and the New Jersey State Planning Commission for their work on a comprehensive state plan. We appreciate the magnitude of this undertaking and its lasting impact on development, redevelopment, conservation, and land use decisions in New Jersey for decades to come. We, the undersigned, write to offer recommendations to ensure all aspects of the plan address the realities of land use, environmental protection, and equitable growth for all residents of New Jersey.

Land Use and Development Restrictions

We are concerned the State Plan does not fully account for existing development restrictions, such as stream buffers, floodplain restrictions, and other land use regulations. By not factoring these pre-existing constraints, the draft overestimates the potential for growth in certain areas. We urge the Commission to incorporate these realities into the growth area analysis to more accurately reflect areas suitable for development.

Implementation and Local Control

While the importance of statewide planning is acknowledged, it is vital to recognize that planning remains fundamentally a local process under New Jersey's current Home Rule structure. The State Plan as it stands serves as a set of guidelines but lacks mechanisms to guarantee its implementation. Without stronger incentives for municipalities to adhere to these guidelines, local buy-in for regional planning (as opposed to traditionally local planning) is uncertain. This issue should be addressed within the preamble

of the State Plan to ensure a more robust and enforceable framework for planning, or to acknowledge the current framework.

Recommendations for Specific Revisions

1. Page 16 - Agriculture and Diversity

- a. **Revise the second full paragraph to read:** "Farmers are adapting to new climate realities. Regenerative and sustainable practices produce fresh, abundant, high-quality food products in proximity to population centers. Residents in all communities have access to affordable, high-quality **culturally relevant** food."
- b. Revise the second full paragraph to read: "New Jersey's racial racial, ethnic, gender, and other diversity enriches all aspects of life in the State. Formerly underrepresented communities actively and productively engage in planning and decision-making. These community-led efforts help future generations benefit from critical investments, regardless of where they live or what language they speak at home."

Note: While racial diversity is critical, we acknowledge that New Jersey's diversity is broader than only racial diversity. Therefore we recommend that "(racial)" be replaced with "(racial, ethnic, gender, and other)" to reflect the full scope of diversity.

2. Page 11 - Housing

Revise the fourth paragraph to emphasize the critical need for affordable housing: "A top priority of the State is promoting an adequate supply of high-quality housing affordable to all age groups and income levels, in transit-rich locations that provide easy access to jobs, education, services and amenities, and in communities that are both ethnically and economically diverse and integrated. The State and municipalities should enact zoning and land use strategies that incentivize private development and expand all forms of housing opportunities. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being. Providing housing opportunities across the traditional housing lifecycle so that individuals and families can rent, buy, retain, and age within properties that they can afford and that meet their needs within communities of their choosing is imperative to the health of residents and communities. Expanding access to family-friendly apartments, senior residences, starter homes, condos, and townhomes is necessary to overcome the State's imbalanced homeownership to rental ratio and to ease the statewide affordability crisis."

3. Page 13 - Historic and Scenic Resources

Revise the first paragraph: "New Jersey must renew and continue ongoing consultations with historically underrepresented groups to identify shared values and determine priorities for managing these cultural resources. The State should support a comprehensive plan to address and mitigate the anticipated impacts of climate change on these assets, and support zoning **and environmental** regulations that protect these resources without stifling positive change."

Additionally, state and county agencies should encourage the arts, not only to stimulate tourism but also to foster local cultural expression for **residents' benefit**.

5. Page 14 - Local Control and Incentives

The Plan needs to acknowledge that planning remains largely a local responsibility, and while local input is essential, there are few incentives for municipalities to follow state guidelines. This should be clearly stated in the text.

6. Page 43 - Parks and Open Space

Revise the last sentence in the first paragraph: "Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to provide public access. Local and regional systems of parks and preserved lands and greenways are also necessary to protect the habitat and recovery of rare, threatened, and endangered species and protect native wildlife species."

Land Preservation and Climate Change Adaptation

One of the most concerning aspects of the Preliminary Draft is the lack of emphasis on land preservation as a goal. While the Plan acknowledges the need to protect natural resources, it prioritizes restoration and regulation over preservation. Land preservation, particularly of forests, wetlands, and agricultural lands, is critical in mitigating climate change and protecting clean drinking water. We urge the Commission to incorporate land preservation as a core goal of the State Plan, particularly in areas like the **Highlands**, **Pinelands**, and Sourland Regions, which serve as crucial **watershed lands**, wildlife corridors, and carbon sinks. Designating the Sourlands as an Area of Critical State Concern (ACSC) would offer recognition and support for conservation efforts in this ecologically significant area. **In addition**, **prioritizing farmland within designated agricultural development areas for preservation would protect our state's agricultural economy, soils, and history.**

Flood Risk and Adaptation

As New Jersey faces increasing risks from climate change, especially flooding, we urge the Commission to strengthen the draft Plan by incorporating strategies for flood adaptation. The State should clearly identify which areas are at greatest risk from coastal and inland flooding and take steps to limit development in these areas, unless specific protective measures are undertaken. The Plan should also include a framework for adapting existing development in flood-prone areas, including better stormwater management, adaptive building standards, and managed retreat where necessary.

Conclusion

The goals of the State Plan, such as promoting inclusive growth, economic development, and sustainability, are commendable. Prioritizing land preservation, climate change adaptation, and the specific needs of overburdened communities would significantly strengthen the draft Plan, as there is a

significant gap in the draft as presented. We urge the Commission to address these concerns in the final version of the Plan to ensure a more balanced, equitable, and sustainable future for all New Jersey residents.

We look forward to your response and the opportunity to continue working with the Commission on these critical issues. Thank you for your efforts and the opportunity to comment.

Sincerely,

Ed Potosnak, Executive Director, New Jersey League of Conservation Voters

Tari Pantaleo, President, Kingston Greenways Association

Tobias A. Fox, Founder-Managing Director, Newark Science and Sustainability, Inc.

David J. Epstein, President, The Land Conservancy of New Jersey

Kelly C. Ruffel, Executive Director, Preservation New Jersey

Elliott Ruga, Policy & Communications Director, New Jersey Highlands Coalition

J. Catherine Suttle, Executive Director, Hunterdon Land Trust

Robert von Zumbusch, President, Millstone Valley Preservation Coalition

Laurie Howard, Executive Director, The Passaic River Coalition



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MEMBER

STATE GOVERNMENT, WAGERING,
TOURISM & HISTORIC PRESERVATION COMMITTEE

COMMISSIONER
EDUCATION COMMISSION OF THE STATES

March 24, 2025

Walter Lane, Acting Executive Director New Jersey Office of Planning Advocacy Department of State P.O. Box 820 Trenton, NJ 08625

Dear Mr. Lane,

I have heard from a number of constituents who are concerned that the Sourland Mountain region is not included in the State Planning Commission's State Redevelopment and Redevelopment Plan as an Area of Critical Concern. I am writing on behalf of my constituents to request the Commission's attention to this issue and consider the need to protect the Sourland region, which is a 90-square-mile of contiguous forest in central New Jersey.

It is my understanding that providing the designation of an "Area of Critical State Concern" would bring crucial protections and resources to the region, to help protect the complex ecosystem of forest, wetlands, and grasslands, which is home to a rich diversity of animal and plant species. Fifty-seven state listed, threatened and endangered species rely on the Sourland region for survival. Additionally, more than 800,000 New Jersey and Pennsylvania residents rely on the Sourland region for some or all of their clean drinking water. Maintaining the health of the forest will reduce stormwater runoff that helps to prevent flooding in the Delaware and Raritan Rivers. The unique character of the region is also a carbon sink, which reduces the concentration of CO2 in the atmosphere to help mitigate climate change.

I greatly appreciate the attention of the Commission to this urgent matter and hope they will agree to protect this fragile resource in our state. Thank you for your assistance.

Sincerely, $f = \int_{\mathbb{R}^{n}} \int$

Shirley K. Turner Senator - 15th District



To: NJ State Planning Commission (@stateplan.comments@sos.nj.gov)

Re: NJ State Development/Redevelopment Plan 2025

Below please see the Middlesex Board of Ag Land Use and Preservation Committees comments on the NJ State Development /Redevelopment Plan 2025:

- Page 11: "Land Preservation should be encouraged, but balanced...."
 - Prioritize areas of redevelopment on previously developed parcels as opposed to new developments on open space or prime farmland
 - Once farmland is developed, can't go back- it is lost forever.
 - Prime farmland should be last resort for development
 - COAH should be concentrated in redevelopment areas
 - See past study on low taxable services used by farms
- SADC/CADB land/use policy professionals should lead the effort to identify properties for sale and respond within 30-day window.
 - o Get offer out before sale finalized
 - Make a preemptive effort to keep land in farming
 - educate municipal/public officials about low tax cost (services, infrastructure) of farms vs developments. Continue education of NJ Association of County Tax Boards, similar to educational conference offered in 2024.
- Standardization of statewide farmland assessment form, easily accessible for determining land under farming among other items
- Recall that during Covid, local food resiliency with smaller farm parcels available in Middlesex County had a major positive impact
- Open space
 - Not being managed currently, stewardship of the land through farming
 - Public open space should have a management plan in place, whether wildlife or farming. Farming can reduce the tax burden by managing land.
 - o 5 yr state bid system sets up farm leasing for failure on open space

New Jersey State Development Plan Draft Comments – 3/21/25

Thank you for the opportunity to comment on the NJ State Development Plan Draft¹. Comments follow:

1. Plan Document:

The document contains a wealth of goals, and a general introduction to the areas the goals pertain to, along with useful statistics. Yet, there are few specifics as to what would be done, how, where, whom or when these goals would be achieved; i.e. actual planning detail is lacking.

The recommendations below are intended to improve this document by making it more specific regarding NJ specific planning information.

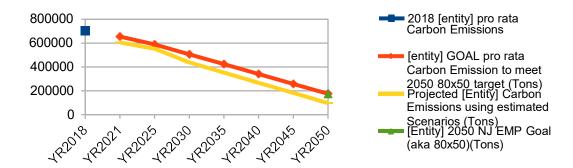
- 2. Provide Detailed Building Electrification Planning²
- 3. Provide Detailed Transportation Electrification Planning³
- 4. Reference Energy Master Plan in Detail

There is a reference to the NJ Energy Master Plan⁴. But the document does not say anything specific about it, just a very general statement about using it to "coordinate" with various entities⁵, without stating what this means, how it would done, by when, by whom, how much would this cost, etc, nor even referencing the new draft of the EMP currently under development and in a comment period first quarter of 2025.

5. Provide Detailed Clean Energy, Grid and PJM⁶ Planning⁷

electrification that the document should cover.

6. Provide Detailed Climate Change Goal Planning The document provides a high level outline of climate change goals, but no planning detail. For example, the document could explain how NJ would achieve the following (shown for an arbitrary entity but would need to be scaled NJ wide). There are many topics that need thorough NJ planning in this regard, including residential and commercial Building Electrification, Transportation Electrification, and other aspects such as port electrification. Improved resident health is another beneficial aspect of



- 7. Provide Detailed Rapid Transit, Transit Oriented Development, and Road Planning8
- 8. Provide Detailed Public Park Planning9
- 9. Provide Detailed Warehouse, Data Center, Industry and Education Planning¹⁰
- 10. Provide Detailed 55+ Housing Planning¹¹
- 11. Needs a thorough review to provide actual planning detail and eliminate all generalities. And eliminate all sentences that appear to say little or nothing.¹²

Robert L Erickson Middletown, NJ rerick987@gmail.com

Affiliated with certain NJ Building Electrification / Clean Energy Teams

- https://nj.gov/state/bac/planning/documents/update-to-state-plan/Draft%20Preliminary%20SDRP%20(SPC%20Approved%2012.4.2024).pdf?utm_medium=email&utm_source=govdelivery
- The document contains a section on climate change. But, there is only a single reference to Building Electrification in the entire document without detailed planning information.

For example, the document should include a reference to Executive Order 316 and its NJ objectives, and what programs, resources, funding, and planned project dates are needed or underway to ensure installation of electrified space heating and cooling systems, and water heating systems in an additional 400,000 homes and 20,000 commercial properties and make 10% of all low-to-moderate income (LMI) properties electrification-ready by 2030.

Similarly, there is no reference to eliminating fossil fuel burning equipment, a serious gap regarding reducing greenhouse gases and moving NJ towards the future electrification that is inevitable if NJ wants to have an advanced economy of the future.

- An upfront section on transportation does not include a reference to transportation electrification in any form. The document contains only a single reference to transportation electrification. The document should including planning detail for how transportation electrification is going to be achieved. For example, including planning detail for how extensive Electric Vehicles will be achieved in NJ, including passenger cars, medium and heavy trucks, buses, scholl buses, fleet vehicles (rental, corporate, state, municipal), garbage trucks, small vessel (ferry) and port electrification, and charging stations for all of these.
- 4 https://www.nj.gov/emp/
- 5 "Use the State Energy Master Plan as a vehicle to coordinate the energy planning activities of State agencies, private utilities, and utility authorities, and encourage local and county buildout analyses to include climate and clean energy initiatives to maintain consistency."
- 6 <u>https://www.pjm.com/</u>
- ⁷ Energy is obviously crucial to the NJ economy. But, the document covers little about it.

For example:

Ensure 100% Clean Electric by 2035 (ref: Executive Order 315). For example, NJ needs to pass S2978 "NJ Clean Energy Act of 2023" which establishes 100% clean electricity standard and directs BPU to establish a clean electricity certificate program.

Modernize and ensure the grid is reliable and can handle the forthcoming increased electrical demands from Building and Vehicle Electrification. For example, NJ needs to pass S3992 Grid Modernization: "This bill would require each electric public utility in the State to 46 develop and implement a plan to modernize the electric 47 transmission and distribution system within its territory."

The PJM, to which NJ belongs, is intrinsic to the NJ economy, yet the document does not reference it. As of a recent evening (3/10/25), fossil fuel (unfortunately) generates over 50% of the pool generated electricity. The

document gives no idea about where NJ gets its electricity or even natural gas from now, nor what the future holds, yet its so important.

NJ had a vast wind turbine electric generation program, with some wind still under development, yet its largely been recently thwarted, thus hurting NJ job development and NJ's future. The document does not mention "electricity", "power plant", "wind turbine/farm" or "natural gas". It does mention "wind port", but does not explain what this is nor provide a reference, nor what is planned for it in the future. The plan does not say how NJ is going to get its electricity in the future, now that so much wind generated electricity has been stalled or eliminated. The document does not say how NJ is going to control the cost of electricity in the future, though a circa 20% rate increase for at least one major NJ electric utility will occur on June 1, 2025.

- While Transit Oriented Development is a good thing, the document would be much more effective if had a primary focus on Transportation Electrification (see prior comment). The reality is that to make a huge dent in greenhouse gases beyond the existing rapid transit systems, vehicles need to be massively electrified as soon as possible. The document should include the quantity of greenhouse gases per year that would be saved from its proposed TOD measures versus how much from the latest NJ EMP (see prior comment). It also seems obvious, that large expansions of rapid transit systems, large increases in bicycle trips, and shorter average vehicle trips are unlikely to happen any time soon; at least the document does not call for this. The current build out for EV s seems likely to far exceed greenhouse gas savings from TOD measure.
- The document fails to show that the following extracted sentence is true; it is more likely that the current gradual and perhaps eventual rapid build out of EV s will vastly exceed the TOD contribution, and may have done so already; but again, the document lacks specifics to back up its TOD contention.
- "By reducing both the number and the average length of trips by private vehicle, TOD is thus an effective strategy to reduce the state's greenhouse gas emissions without waiting for widespread adoption of electric vehicles."
- There appears to be only one cursory reference to each of New Jersey Transit, PATH, and PATCO systems. There is a sentence that references how improvements cannot happen due to funding vagaries, which may be true, but that is the opposite of a plan, so the document needs to do better. Instead, the document needs to reach out to these entities, and drive them to provide a rapid transit planning document that builds these systems out for the benefit of alleviating the housing shortage by massive housing build out at existing and new train stations, and thus also reducing greenhouse gases. In fact, without the rapid transit improvement, the TOD called for cannot occur, as TOD based on bikes and walking alone will fail.
- There appears to be no reference to the Port Authority, New Jersey Turnkpike, Garden State Parkway, Atlantic City Expressway, Palisades Parkway, and PA turnpike, state & interstate highways, and both Hudson and Delaware River bridges and tunnels. Despite their huge importance, their impact on NJ transportation, the NJ economy, the environment and pollution, LMI communities, housing, transportation electrification, port electrification, and EV charging stations is not mentioned, nor their plans, including funding, and traffic forecasts now and the future. Yet these are also currently vital arteries for the economy of NJ, along with the rapid transit systems.
- There are several general references to parks, and the need to plan for them. However, there is nothing specific in the document. For example, Liberty State Park has been undergoing a planning process with public input, and there is no reference to this. The document needs to summarize or list all state and county parks and historical sites, and what is the plan for them (what, when, who, funding), gathering this input from the respective authorities. Only then will there be a real state plan regarding these.
- The document makes a few cursory references to warehouses, but not in a planning sense. Nowhere does it seem to recognize the huge impacts the warehouse build out has had on communities, including rural lands, traffic, pollution, etc.; these warehouses can be seen almost everywhere it seems along NJ roads. Its not a plan to ignore the topic, as undesirable as these warehouses may be in many ways, aside from the obvious benefit that they are driven by the people of NJ buying on-line from them and the enterprises that profit from them, often taking profits outside NJ. Rather, NJ needs a warehouse growth control plan.
- There is no reference to data centers in NJ. Yet, these are huge land and electricity hogs, and hugely important to NJ going forward at least in an impact sense. There is a single reference to Artificial Intelligence, but zero information as to how this massive change, currently underway nationwide, might impact NJ, never mind what to do about it, if anything. This author knew nothing about data centers in NJ when these comments were started, yet, in 15 seconds of on-line searching, the author found per one website there are already 43 data centers in NJ, mostly in urban like areas.
- The document needs a systematic reference to all industries and economic generators in NJ, and what is the forecast for them, regardless of whether public or private. For example, the huge drug industry in NJ is not mentioned. What is happening with it now, 5 years from now, 10 years from now? What are the college, university and technical school plans? Rutgers University and many others are not mentioned (Rutgers only in the acknowledgment section). Charter schools are not mentioned, and public schools are scarcely mentioned. What does NJ need to do to educate its citizens and workers of the future, especially with the impending demise of the federal Department of Education?

- In several places, the document makes the good point that NJ is aging, and provides statistics. In general, it also points out that housing is a major issue. Yet, the document does not provide a summary of 55+ housing in NJ such as the various types nor what should be done about it re planning. 55+ housing may include single family home HOA type developments, condo HOA developments, stay in place single family homes, senior subsidized rental housing, assisted living of various types, nursing homes, veterans homes, etc. The document does not address what the best types of senior housing could be, where this could be located, how funded, etc, i.e. it does not propose housing solutions for 55+.
- For example, regarding the first sentence in the following, provide a list of exactly where this is already done (if any), and where it needs to be done, how, when, and funding; meanwhile, the second sentence says nothing at all (taking the 2nd sentence to an extreme, it appears that any existing turnpike or parkway rest area meets the requirements of the 2nd sentence):

"Separate regional through traffic from local traffic by way of limited access roads. Encourage development and retrofit of roadways to reflect the current or future environment at human centered scale, where appropriate."

To: Members of the New Jersey State Planning Commission and staff

Re: Comment on the Draft Preliminary State Plan: Call for a Framework for Adapting to Climate Change

Dear Members of the State Planning Commission,

We, the undersigned, ask the Commission to directly address the need for the state of New Jersey to incorporate future climate-related threats into fundamental questions about where the state should and should not develop or redevelop in the future, and how best to protect existing development from these threats.

An estimated 1.7 million New Jersey residents, or 19% of the population, live in areas that are now or are projected to be at risk from coastal flooding or inland flooding or both, based on the overlap between the state's already-developed lands and the map layers representing areas subject to the Department of Environmental Protection's (DEP) 2023 Inland Flood Protection Rule (the NJ Inland Design Flood Elevation layer) and its proposed 2024 Resilient Environments and Landscapes (REAL) rules (the Climate Adjusted Flood Elevation layer).

The process of updating the New Jersey State Development and Redevelopment Plan (State Plan) is an opportunity for state government leaders to address the need for clarity on which parts of the state are at the greatest risk from the present and future effects of climate change, particularly flooding, and take steps to prevent further development from happening there unless protective measures are to be taken. The draft Plan already speaks in numerous places about the need to avoid steering future development into areas that we know are presently, or will be in the foreseeable future, at risk from flooding.

State government leaders will also need to formulate strategies for lands within the coastal and inland flood zones that are already developed, so as to plan how best to protect residents and businesses already inhabiting these areas. The state planning process should provide a framework for determining which areas are most appropriate for which of the following broad approaches:

• Better stormwater management: In some built-up inland areas, flood risk can be mitigated via improvements to drainage system capacity, in places where that is the limiting factor. Small-scale actions such as the installation or widening of culverts; green infrastructure measures; detention basins; removal of impervious cover; and other stormwater retrofit projects can reduce the likelihood and severity of flooding, thereby alleviating the need for additional protective measures. As a bonus, green infrastructure techniques like bioswales and street trees can help improve air quality and reduce heat-island effects, both of which pose health threats to residents both within and outside the flood zones.

- Adaptive building standards: In places where large-scale protective measures are not
 cost-effective, adaptive building standards like raised building heights and breakaway
 walls on the ground floor can offer some mitigation against risks to life and property,
 provided that the infrastructure serving these areas is also resilient.
- Fortification and large-scale hardening measures like <u>floodwalls</u>, levees, and dunes—designed to keep water out—can effectively protect residents and businesses from flooding if enough development is concentrated in the risk areas to keep the per-capita costs of constructing the barriers low enough. Similarly, restoring wetlands (and conserving existing ones) helps flood-prone areas to fortify, since wetlands act as a sponge to absorb and slow floodwaters, as well as buffer coastal communities from storm surges.
- Managed retreat: Finally, in places where fortification is not cost-effective and where
 adaptive measures are too burdensome, whether financially or from a lifestyle standpoint
 (as with older residents having to climb stairs into elevated buildings, for example), plans
 and timeframes for the coordinated relocation of residents and businesses will need to
 be considered. In the short term, the state and federal government can expand buyout
 programs like New Jersey's Blue Acres, but additional longer-term solutions will also be
 necessary.

We urge the Commissioners to strengthen the proposed update to the State Plan by including a call for the development of a geographic climate adaptation framework that identifies the geographic areas that are appropriate for each adaptation strategy.

While such a framework does not yet exist and is not likely to be completed in time for inclusion in the final version of the State Plan, the text of the draft Plan's section on Climate Change should nonetheless be amended to include a call for the State Planning Commission to work with relevant state agencies to create the framework. The Commission should make this one of its first implementation actions, post-adoption. Considering the hardships that climate change will impose, particular attention should be paid to assisting under-resourced communities that are not well-equipped to adapt to the risks on their own.

Signed,

Pete Kasabach, Executive Director New Jersey Future

Gary Toth, Gary Toth Consulting

Heather Fenyk, Board President Lower Raritan Watershed Partnership

Doug O'Malley, Director Environment New Jersey

Ed Potosnak, Executive Director New Jersey League of Conservation Voters

Laurie Howard, Executive Director The Passaic River Coalition

Michael L. Pisauro, Jr. Esq., Policy Director The Watershed Institute

Elliott Ruga, Policy & Communications Director New Jersey Highlands Coalition

Rachel Dawn Davis, Public Policy & Justice Organizer Waterspirit

Richard Lawton, Executive Director New Jersey Sustainable Business Council

Kate Boicourt, Director, Climate Resilient Coasts and Watersheds Environmental Defense Fund

Cc:

Walter Lane, Executive Director, NJ Office of Planning Advocacy Dylan McNamara, Policy Advisor, Office of the Governor Shelbourne at Hunterdon 53 Frontage Road, Suite 110 Hampton, New Jersey 08827

Main: 877 627 3772



Via Email: stateplan.comments@sos.nj.gov March 7, 2025

Department of State
Office of Planning Advocacy
PO Box 300
Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Borough of High Bridge, Hunterdon County Project No. HIP-001A

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Borough of High Bridge, Hunterdon County. High Bridge submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

This goal seems to contradict the Natural and Water Resources Goals and Priorities, which focus on preservation. Additionally, this text appears to be blind to the Highlands Region, which is a sensitive environmental area, within which certain sub-zones are encouraged to be preserved and/or have limited development.

 Page 13. Historic and Scenic Resources is another one of the State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Borough supports this statement and encourages public access to the Borough's State, County, and Municipal owned open spaces.

Project No. HIP-001A March 7, 2025 Page 2 | 7



Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

This section contains the first mention of the term "accessory dwellings" in the State Plan. It is stated throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

• Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."

No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.

Page 26. Housing as a Catalyst for Economic Development – Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."

This text should be revised to recognize water and wastewater limitations. Suggested text "In areas where water and wastewater infrastructure is available and capacity remains...."

Additionally, the Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.

 Page 26. Housing as a Catalyst for Economic Development - Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for Project No. HIP-001A March 7, 2025 Page 3 | 7



development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. Furthermore, communities within the Highlands Region must abide by the Highlands Regional Master Plan and cannot up-zone in non-sewered areas. The above-quoted text should be rewritten to address these issues.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined.

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

 Page 29. Housing and Transportation – Priorities states, "Boost transit ridership through Transit-Oriented Development. Appropriately sited housing is proven to boost transit ridership while reducing congestion and air pollution."

The last sentence above is not qualified. A report or study should be cited, otherwise it appears to be a net opinion.

Infrastructure

Page 31. Infrastructure Goal, Transportation – Priorities provides several goals, one of which is:

Maintain and expand public transportation to areas of planned higher-density development that provide opportunities to take advantage of the efficiencies of mass transit in ways that support residential and non-residential development consistent with the Policy Objectives of the Planning Areas.

Clarification is needed on what "planned higher-density development" includes. Is it a specific density range or just above the average permitted density in a municipality?

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Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Revitalization and Recentering

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality?

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Borough supports the above goal as written but encourages the State to reconsider and revise the goals and priorities listed for housing.

Page 44. Habitat Preservation and Restoration – Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."

As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.

Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

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The Borough supports this priority, but it is unclear what entity is charged with these actions.

Historic and Scenic Resources

 Page 53. Open Space and Recreational Resources - Priorities states, "Promote adequate and appropriately located indoor and outdoor recreational facilities for the year-round enjoyment and health of all residents."

The Borough supports this priority and encourages the State to provide funding to aid in parkland development and facility upgrades.

2024 Comprehensive Planning

Pages 61 and 62. Regional Planning and Areas of Critical State Concern. This section recognizes that the State Planning Act does not acknowledge the Highlands Water Protection and Planning Act but "...should treat the Highlands Region and the Highlands Regional Master Plan with the same deference as the Special Resources Areas that are named in the State Planning Act." (Pinelands National Reserve and Hackensack Meadowlands District). Additional areas of concern to be considered in the future also include the Skylands Region, of which the Borough is a part.

Statement of fact, not a comment, High Bridge is entirely located within the New Jersey Highlands Region.

Page 64. New Jersey Highlands – Priorities section indicates the State Plan must recognize
the need for the Highlands Region to be considered differently from the rest of New Jersey in
terms of land use planning and agency collaboration and coordination.

The Borough agrees with the above statement, but it unclear from the report if the Draft State Plan is irrelevant for communities located in the Highlands Region. Said differently, are communities within the Highlands Region required to conform to the Draft State Plan and the Highlands Regional Master Plan? Or are Highlands communities solely mandated to conform to the Highlands Regional Master Plan? The Draft State Plan should be revised to address this question.

Chapter C. State Plan Policy Map

Page 68. This Chapter discusses the State Plan Policy map associated with the State Plan, including the difference between Planning Areas, Centers, and Environs, the Planning Areas (1 - 5). However, the bottom of page 68 states, "The State Plan Policy Map applies to all lands except... lands that are subject to the jurisdiction of the various regional planning entities created by the State or the Federal government."

High Bridge recommends a sentence be added to direct communities within a regional planning area to refer to the applicable regional planning agency mapping. Hyperlinks would be useful for citizens and practitioners to easily source this information.

■ The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that

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the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.

- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcqis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Plan should be supplemented with a copy of the State Plan Policy Map.
- The linked map above does not provide any designation for High Bridge Borough. As High Bridge is fully conforming with the Highlands Regional Master Plan, the Highlands Land Use Capability Zones should be the State Plan layers illustrated for High Bridge.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

High Bridge takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level.

General Comments

- It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix.
- The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

As High Bridge is fully conforming to the Highlands Regional Master Plan the State Plan Policy Map should be revised to illustrate the Highlands Land Use Capability Zones for the Borough.

The Borough of High Bridge encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. High Bridge welcomes a meeting to discuss the requested State Plan Policy Map amendment.

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Sincerely,

Colliers Engineering & Design, Inc.

Dalue a. Bleen

Darlene A. Green, P.P., AICP Borough Planner

cc: Michele Lee, Mayor (via email mlee@highbridge.org)
Brett Bartman, Administrator (via email administrator@highbridge.org)



Via Email: stateplan.comments@sos.nj.gov March 6, 2025

Department of State Office of Planning Advocacy PO Box 300 Trenton, NJ 08625

Comments: Preliminary Draft of the New Jersey State Development and Redevelopment Plan Township of East Hanover, Morris County Project No. EHT-001A

To whom it may concern,

This office has reviewed the Preliminary Draft of the New Jersey State Development and Redevelopment Plan ("Draft State Plan") on behalf of the Township of East Hanover, Morris County. East Hanover submits the following comments and concerns in italics, which are grouped according to chapter.

Executive Summary

Pages 11 and 12. The Executive Summary summarizes the goals of the Draft State Plan. Housing is one of those goals and its summary states, "Land Preservation should be encouraged, but balanced so that we do not concentrate all preservation in certain regions, shifting the growth burden to already overburdened high-density residential areas......Zoning encouraging employment growth that does not provide for a proportional increase in housing is inconsistent with the Plan." The Housing Goal on page 23 provides a similar statement.

East Hanover seeks clarification on the statement "provide for a proportional increase in housing". What does proportional mean? The text should be revised to define or explain the quoted phrase.

 Page 13. Historic and Scenic Resources is another one of the Draft State Plan's goals and its summary states, "The State should also facilitate public access to high-quality open space, scenic landscapes, historical resources, and recreation resources.

The Township supports this statement and encourages public access to the Township's spaces.

Chapter B. 2050 Statewide Planning Goals, Strategies, and Priorities Goals

Housing

 Page 23. The Strategy states, "Enable housing growth in transit-rich, mixed-income communities, supporting multi-generational households, and providing a balanced mix of rentals, starter homes, senior housing, and market-rate units to meet future population growth and address affordability needs. Encourage municipalities to adopt inclusionary

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zoning, streamline development through public-private partnerships, and integrate green building standards and transit-oriented infrastructure to improve sustainability."

This strategy seeks to build housing blind to environmental limitations and utility constraints. Housing development must work within the confines of environmental limitations and utility constraints. This strategy should be revised to encourage housing development outside of environmentally sensitive lands and limit housing development to existing utility constraints.

Page 23. The Goals section states, "Ideally, new housing will be created in transit-rich locations and in communities that are ethnically and economically diverse and integrated. Facilitating multi-generational households through the creation of accessory dwellings and multi-unit dwellings is critical to promoting well-being and supporting New Jersey's diverse population."

The Township of East Hanover has limited access to public transportation with one bus route along Route 10. The Draft State Plan does not provide a separate housing goal oriented toward communities lacking public transportation. Clarification should be provided on the goal for housing development in areas lacking public transportation.

Additionally, this section contains the first mention of the term "accessory dwellings" in the Draft State Plan. It is stated throughout the Housing section. However, the Glossary (page 85) does not include a definition. Clarification should be provided on what the State views as an "accessory dwelling".

- Pages 23 and 24. The Goals section states, "Zoning used to exclude potential residents from communities with plentiful jobs and high-performing schools is inconsistent with the Plan."
 - No examples are provided on what type of zoning would be considered inconsistent with the Plan. Is it single-family zoning, multi-family, or the location of certain zones? Also, would the existing zones that have historically been in place for decades be considered inconsistent? Or would this apply to new zones only? Clarification should be provided.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "In areas where water, wastewater, and transportation infrastructure is available, allow for increased residential development densities as a consideration for providing required affordable housing set-asides."
 - This text should be revised to recognize water and wastewater limitations. Suggested text "In areas where water and wastewater infrastructure is available and capacity remains...."

 Additionally, the Draft State Plan does not define what would be considered "increased residential development densities". As written, that could be interpreted to mean one more unit per acre.
- Page 26. Housing as a Catalyst for Economic Development Priorities states, "Nothing in this Plan is to be interpreted as a reason for a municipality not to meet its housing requirements as promulgated in New Jersey statutes. Where a municipality has limited land suitable for

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development, redevelopment options, up-zoning, or other similar solutions must be implemented to meet constitutional requirements."

"Up-zoning" is not defined in the glossary. This should be added so municipalities have an understanding when reviewing mechanisms to address affordable housing. Additionally, the last sentence in this statement is incorrect, specifically the word "must". Towns with limited vacant and developable land are permitted to seek an adjustment of their obligation, which would reduce their affordable housing obligation. The above-quoted text should be rewritten to address the misstatement.

Page 27. Housing Stock Diversity – Priorities states, "Ownership opportunities for young workers and families must also be a priority. More starter homes, condos, townhomes, and ADUs are needed to make homeownership attainable for low- and moderate-income households."

Clarification is needed as to what would be considered a "starter home". Also, "ADUs" appears to stand for "accessory dwelling units", which is not defined. A definition should be provided within the document.

Page 27. Reducing Barriers to Development – Priorities states, "Minimize restrictive zoning. Many restrictive zoning practices are rooted in, and serve to reinforce, socioeconomic segregation. Zoning codes which ban multifamily development or ban ADUs will also restrict housing affordability and disincentivize private development."

Restrictive zoning is not defined. Clarification should be provided so municipalities understand if their zoning would be considered "restrictive".

Page 29. Health and the Environment – Priorities states, "Communities across the State are increasingly vulnerable to climate change as coastal flooding, river flooding, and extreme heat have all become commonplace. Housing built in areas at higher flood risk should elevate systems, develop evacuation plans, and secure adequate building and flood insurance."

The Township is located between the Passaic River, which flows along the eastern boundary of East Hanover, and the Rockaway River, Whippany River, and Black Brook, which flow along the western boundary. As a result, most of the area adjacent to these rivers is within FEMA's 100-year flood zone and is encumbered with wetlands. Much of the Township's "vacant" lands are constrained by these environmental features. It is unclear how development could occur within wetlands and/or flood prone areas. Additionally, clarification is needed on who would be responsible for preparing evacuation plans and for requiring building and flood insurance? Additionally, clarification is needed on what "systems" need to be elevated. The text should be supplemented with the entity responsible for implementing the identified tasks.

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Infrastructure

Pages 33 and 34. Clean Energy – Priorities states, "Promote and encourage development and redevelopment in higher intensity mixed-use, Urban Planning Areas, Suburban Planning Areas, growth areas, endorsed plans, Centers, and re-centered urbanized areas that accommodate the use of alternative modes of transportation and shared parking and other site improvements and infrastructure."

Clarification is needed on what "higher intensity mixed-use" includes.

Revitalization and Recentering

Page 36. Revitalizing Older Centers – A priority is to "Identify new centers", which states, "This can be done by redeveloping underutilized areas, particularly areas with connectivity to multimodal transit options or other underutilized amenities that can drive economic activity. These redeveloped areas should support new housing, businesses, and public amenities, including parks and open spaces."

It is unclear who is supposed to identify new centers – the State, County, municipality? The document should be revised to indicate what entity will be responsible for this task.

Climate Change

- Page 41. Hazard Mitigation Priorities states, "Promote regional, watershed-level stormwater planning to reduce flooding risks and enhance water quality, prioritizing naturebased infrastructure solutions to manage stormwater and support ecosystem resilience."
 - The Township supports this priority. However, clarification is needed on who would be tasked with conducting "regional, watershed-level planning" the County, each municipality in a watershed, or another entity?
- Page 41. Hazard Mitigation Priorities states, "Support intergovernmental and community partnerships for comprehensive stormwater modeling to understand cumulative impacts on water systems, downstream communities, and natural habitats."
 - The Township supports this priority, but is unclear what entity would be in charge of leading the creation of intergovernmental and community partnerships. The text should be revised to identify the entity responsible for this priority.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Promote well-managed coastal and riverine communities, including natural resource maintenance and restoration programs, to encourage economies that are compatible with the natural environment, minimize the risks from natural hazards, and provide equitable access to coastal and riverine resources for public use and enjoyment."

The Township supports this priority. However, nearly all of East Hanover is identified in the Metropolitan Planning Area (PA1) on the Interactive Locator Map (see discussion below). It is

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unclear how this priority can be achieved if the Township's flood prone and wetlands areas are identified as a Planning Area earmarked for high-intensity development.

- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Promote smart growth by implementing DEP floodplain regulations."
 - It is unclear what is meant by this statement. Additional text should be provided to clarify how DEP floodplain regulations promote smart growth in developed towns.
- Page 42. Coastal Areas and Riverine Corridors Priorities states, "Protect vital ecological and special hazard areas such as coastal and riverine high-hazard areas to prevent significant adverse long-term impacts on the natural functions of these sensitive areas."

The Township supports this priority. However, much of the Township's vacant lands are within the 100-year flood zone and contain or are adjacent to wetlands. The Draft State Plan should add details on how to mitigate impacts to existing developed areas in high-hazard areas.

Natural and Water Resources

Page 43. The Goals section states, "All levels of government, including regional planning agencies, should take actions to avoid, minimize, and mitigate site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions, invasive species, and the use of toxic building materials and ingredients; and prioritize natural and nature-based strategies and solutions. Continued development and preservation of local and regional systems of parks and preserved lands linked by trails, greenways, and public rights-of-way is necessary to protect the habitat and recovery of rare, threatened and endangered species, and protect native wildlife species."

The Draft State Plan demands more housing development as one of its goals. However, it is unclear how a community can avoid site disturbance, tree removal, and impervious coverage when building housing unless all housing construction is to take place on previously developed land. The Township supports the above goal as written but encourages the State to reconsider and revise the goals and priorities listed for housing.

- Page 44. Habitat Preservation and Restoration Priorities states, "Municipal master plans and zoning ordinances should make it explicit that habitat restoration is expected to occur as part of any (re)development project, to the extent that it is feasible."
 - As NJDEP regulates the habitats of threatened and endangered species, habitat restoration should be the purview of NJDEP and its experts, not a municipal zoning ordinance.
- Pages 46. Water Quality Priorities states, "Encourage regional flood and stormwater management planning and implementation, where appropriate, and support the creation of regional control facilities... Require new development to reduce peak runoff rate to prevent increases in flooding and damage to stream corridors..."

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Clarification should be given as to what entity would be in charge of managing "regional flood and stormwater management planning and implementation." The text should be supplemented to indicate the responsible entity.

Page 47. Water Quality – Priorities states, "Identify and delineate sensitive surface water and groundwater resources, including aquifer recharge areas, headwaters, reservoirs, and Category 1 systems and take steps to protect them from impacts of development. Establish maintain, and restore appropriately vegetated buffers along streams, rivers, wetlands, reservoirs, and scenic waterways to protect the natural functions and quality of surface water resources."

The Township supports this priority, but it is unclear what entity is charged with these actions. The text should be supplemented to indicate the responsible entity.

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The Township supports this priority and encourages the State to provide funding to aid in parkland development and facility upgrades.

Chapter C. State Plan Policy Map

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- The document mentions a "State Plan Policy Map" 17 times, but nowhere in the document does it inform readers where to find said "State Plan Policy Map". In fact, page 120 specifically states that the "Smart Growth Explorer is not part of the official State Plan Policy Map". Therefore, it is unclear where one would find the State Plan Policy Map.
- The Draft State Plan does not include an actual map within the document. However, the Office of Planning Advocacy website includes a link to an Interactive Locator Map, which displays the Planning Areas. The map can be accessed here:

 https://dosopa.maps.arcqis.com/apps/webappviewer/index.html?id=fbb0c0a8c7ce4a31b05d123426c4a79a. Since there is no physical copy of the map, it is unclear if the State can update the map boundaries and/or designations at any time. Currently, the metadata of the Planning Areas layer indicates the last edit date was 11/24/2024. The Draft State Plan should be supplemented with a copy of the State Plan Policy Map.
- Based on the Interactive Locator Map, East Hanover is primarily within the Metropolitan Planning Area (PA1). A portion of the Township is within the Parks, Open Space, and Natural Areas category. We offer the following comments regarding the Township's Planning Area designations:

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- Page 72. One of the intents of PA1 is to "Provide for much of the state's future growth in compact development and redevelopment." The Guiding Criteria of the PA1 includes a density of more than 1,000 people per square mile, existing public water and sewer systems and access to public transit systems, more than 1 square mile of land area, and a population of at least 25,000 people. East Hanover has a population of 11,106 people according to the 2023 ACS, which does not meet the guiding criteria. The Township is just over 8 square miles, which does equate to a density of 1,371 people per square mile and meets the guiding criteria. However, there is only one bus line within East Hanover and no train station, which wouldn't meet the criteria of accessible public transportation. Therefore, it appears the Township does not fit the PA1 designation.
- O However, the other Planning Areas, Suburban (PA2), Fringe (PA3), Rural (PA4) Planning Areas call for a population density of less than 1,000 people per square mile. The Township's density is more than this and doesn't appear to meet the guiding criteria of the other Planning Areas. Clarification is needed on how communities were previously designated. Furthermore, it is recommended that the Township's Planning Area designation be reconsidered.
- Additionally, as discussed above, the perimeter of the Township is largely undeveloped, contains wetlands, and is within the 100-year flood zone. Consistent with the Climate Change and Natural and Water Resources Priorities discussed above, the Planning Area designation of these areas should be amended to the Environmentally Sensitive Planning Area to encourage the protection of these environmental resources.

Chapter D. Implementation

Page 83. "Municipal planning in New Jersey is outdated. Many local governments lack resources to handle planning related procedures. Regional considerations should adhere to the goals outlined in the State Plan, which should be considered as the framework for decision-making. Regional considerations (regional master planning) help address inequitable municipal planning capabilities."

East Hanover takes exception with the above statement. The above statement should be deleted from the Draft State Plan or substantially revised. It appears the Draft State Plan suggests municipalities that lack resources be eliminated and governed/regulated at a regional level, rather than a local level. It is unclear how a municipality would be determined to "lack resources" and who would make the determination.

General Comments

It is unclear throughout the report what goal/priority is implemented by the State, County, municipality or the private sector. The text should be clarified, or a matrix provided in the appendix. Project No. EHT-001A March 6, 2025 Page 8 | 8



The Planning Goals, Strategies, and Priorities Goals should be numbered to enable practitioners and citizens to easily refer to statements within the report as opposed to referring to a page number.

Map Changes

- The State Plan Policy Map should be enhanced with an overlay for flood hazard areas to recognize the danger stream corridors face.
- East Hanover requests that the Township's designation of PA1 be amended to PA2, Suburban to reflect the overall population and lack of public transportation.
- East Hanover also requests that the undeveloped perimeter of the Township that contains wetlands and streams and is located within the 100-year flood zone be reclassified to the Environmentally Sensitive Planning Area (PA4B) to encourage the protection of these environmental resources.

The Township of East Hanover encourages the Office of Planning Advocacy to revise the Draft State Plan to address the above comments and concerns. East Hanover welcomes a meeting to discuss the requested State Plan Policy Map.

Sincerely,

Colliers Engineering & Design, Inc.

Darlene Green, PP, AICP

Dulue a. Sleen

Township Planner

cc: Joseph Tempesta, Jr. (via email <u>joet@easthanovertownship.com</u>)
William Salemme (via email <u>wsalemme@maxsubro.com</u>)

February 28, 2025

New Jersey State Planning Commission New Jersey Office of Planning Advocacy P.O. Box 204 Trenton, NJ 08625

Dear Members of the State Planning Commission:

As organizations dedicated to environmental conservation, water quality protection, and responsible land stewardship, we write to express our strong support for designating the Sourland Mountain Region as an Area of Critical State Concern (ACSC) in the final State Development and Redevelopment Plan.

The Sourland Region is one of New Jersey's most ecologically significant landscapes. Spanning more than 90 square miles across three counties, it serves as a critical wildlife corridor, a carbon sink that helps mitigate climate change, and a natural filtration system for clean air and water. The Watershed Institute estimates that over 800,000 residents in New Jersey and Pennsylvania rely on the Sourlands for some or all of their drinking water.

Despite its ecological importance, the Sourland Region faces unprecedented threats, including the Emerald Ash Borer infestation, Beech Leaf Disease, overbrowsing by deer that prevents forest regeneration, invasive plant species, and increasing development pressures. Without immediate intervention, these challenges will have long-term consequences for water quality, biodiversity, and climate resilience in the region.

By designating the Sourlands as an ACSC, the State Planning Commission can provide much-needed recognition and support for conservation efforts. This designation would create opportunities for increased funding for forest restoration, facilitate regional coordination on effective deer management strategies, and help ensure that future development is compatible with the ecological integrity of the region.

The Sourland Conservancy, in partnership with the undersigned organizations, has been actively working to preserve and restore the Sourland Mountain Region's rich ecological and historical heritage. Through land preservation, reforestation projects, habitat restoration, educational initiatives, and sustainable land management practices, we are collectively safeguarding this unique landscape.

We urge the State Planning Commission to take decisive action now by designating the Sourland Region as an Area of Critical State Concern. Doing so will protect this vital landscape for future generations and reinforce New Jersey's commitment to environmental stewardship and sustainable growth.

Thank you for your time and consideration. We welcome the opportunity to discuss this further and look forward to your leadership on this critical issue.

Sincerely,

Sourland Conservancy The American Littoral Society Association of New Jersey Environmental Commissions (ANJEC) Center for Environmental Studies, Raritan Valley Community College D&R Greenway Land Trust Delaware Riverkeeper Network **Duke Farms Environment New Jersey** Featherbed Lane Bird Banding and Research Station Friends of Hopewell Valley Open Space Great Swamp Watershed Association Lambertville Goes Wild Lambertville Parks and Recreation Commission Lower Delaware Wild & Scenic Management Council The Land Conservancy of New Jersey

The League of Women Voters of New Jersey
Montgomery Friends of Open Space
Musconetcong Watershed Association
New Jersey Conservation Foundation
New Jersey Highlands Coalition
Raritan Headwaters
Ridge and Valley Conservancy
Ridgeview Conservancy
Stoutsburg Sourland African American Museum
(SSAAM)
Washington Crossing Audubon Society
The Watershed Institute

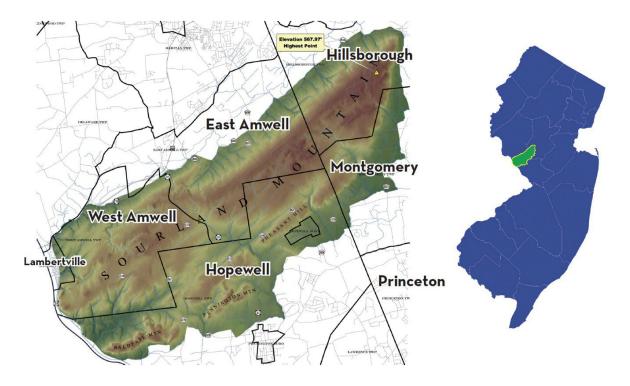
The preliminary draft of the State Development and Redevelopment Plan (SDRP) lists the Sourlands as an area that should be considered in the future as an Area of Critical State Concern (p. 62). The Sourland Conservancy believes that future is now and asks that the Sourlands be named an Area of Critical State Concern without delay.

Currently, we do not seek or endorse any new regional authority, but only State recognition of the critical role the Sourlands have as:

- A vital ecosystem
 - Home to dozens of rare and endangered species of plants and animals
 - An irreplaceable stopover for migrating birds
- Headwaters that feed the supply of drinking water for more than one million New Jersey residents (and more in neighboring Pennsylvania)
- The most intensive carbon sink the New Jersey
- Countless historical sites, from the crossroads of the Revolution to the Underground Railroad

Further details, including planning and implementation strategies, are included below.

The Sourlands



New Jersey's Sourland Mountain Region encompasses 90 square miles in the west-central part of the state, stretching from the Delaware River in Lambertville to southern Somerset County. This Special Resource Area represents just over 1 percent of the state's land area,

and includes parts of three counties (Mercer, Somerset, and Hunterdon) and seven municipalities (Hopewell Township, Hopewell Borough, Hillsborough Township, Montgomery Township, East Amwell Township, West Amwell Township, and the City of Lambertville.)

The unique character of the Sourland region derives in large part from diabase rock, which underlies the ridges of the region and peppers its surface with boulders. Originating in magma-filled rifts 150 million years ago, the diabase helped the Sourland area retain its wild character by limiting agriculture and development, leaving Central New Jersey's largest contiguous forest as a fortunate byproduct.

The Sourland region is an island of biodiversity in a sea of encroaching sprawl. The Sourlands are home to dozens of rare and endangered species of plants and animals, and an irreplaceable stopover for migrating birds. The region includes critical deep forest habitat that is vanishingly rare in Central New Jersey, as well as grasslands, forested wetlands, emergent wetland habitats, and vernal pools critical to amphibian breeding.

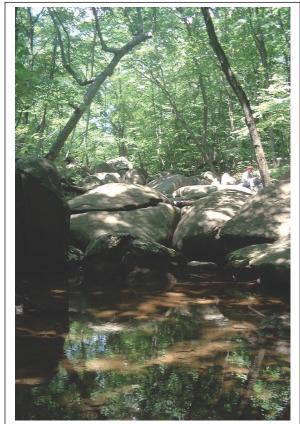
Accordingly, the previous New Jersey State Development and Redevelopment Plan mapped

the majority of the Sourlands as Environmentally Sensitive (Planning Area 4B or Planning Area 5). The region includes the headwaters of numerous streams characterized as C1 and C2 -- tributaries of the Raritan and Delaware rivers, vital sources of drinking water for more than a million residents of New Jersey downstream of the Sourland Mountain region, including the City of Trenton.

Adjacent to heavily developed parts of the state, the Sourland forest serves as the most intensive carbon sink in New Jersey. Its location near heavily developed urban and suburban areas gives the Sourlands outsized importance as a recreational resource. The area is also rich in historical significance, from the American Revolution through the Underground Railroad.

Planning and Implementation Strategies

To achieve the Goals of the State Plan, the state of New Jersey, in cooperation with federal and interstate agencies, municipal, county, and regional governments, the private sector and the public, should initiate the following activities:



Geologic features of the Sourlands include Roaring Rocks, where a babbling brook echoes beneath magnificent boulder field.

- Formally acknowledge the Sourlands as a high-priority region for land preservation, with emphasis on wildlife habitat.
- Provide funding for habitat protection and restoration e^orts, including reforestation needed to recover from recent plagues of invasive insects.
- Take bold steps to control the population of white-tailed deer in the Sourlands, the overpopulation of which prevents nearly all natural regeneration of the forest.
- Encourage the linkage of greenways within the Sourlands and between the Sourlands and surrounding natural areas, with wildlife crossings where needed.
- Encourage the linkage of hiking and cycling trails within the Sourlands and between the Sourlands and surrounding areas.
- Update the privately developed *Sourland Mountain Comprehensive Management Plan*, published in 2010, to reflect current conditions and the region's status as a Special Resource Area.
- Undertake e^orts to increase public awareness of the Sourlands.



February 27, 2025

Thomas Wright
Chairperson
New Jersey State Planning Commission
NJ Department of State
PO Box300
Trenton, NJ 08625

Re: Comments on the Preliminary Draft of the State Development and Redevelopment Plan

Dear Mr. Wright:

Advocates for Children of New Jersey (ACNJ) thanks the New Jersey State Planning Commission for the opportunity to comment on the preliminary draft of the State Development and Redevelopment Plan. This Plan is a potentially important step in reshaping the physical development of the State over the next decade.

For all its many real virtues, the draft Plan omits an important planning determinant of New Jersey's future economic development and prosperity: planning for child care. To put it simply, without an adequate supply of accessible and affordable high-quality child care facilities, New Jersey will not have a stable, high-quality workforce. Because the availability of physical facilities is an important obstacle to creating a supply of accessible and affordable high-quality child care facilities, this is a statewide planning issue that cannot be neglected in a sound statewide plan.

Advocates for Children of New Jersey

ACNJ is New Jersey's leading advocacy organization for children in New Jersey. Independent and non-partisan, it has worked for almost 50 years with local, state, and federal leaders to identify and implement changes that will benefit New Jersey's children. Among other things, it has focused its advocacy efforts on expanding opportunities for child care that is high quality, affordable, and widely accessible. More information on ACNJ is available on its website, www.acnj.org.

Child Care and Land Use Policy

The majority of American parents with very young children are now in the workforce. Of the 14 million American parents with children under the age of three, 11 million-78 percent-are working. In New Jersey, of the approximately310,000 children under age three, 66 percent have all parents in the workforce. This means that there is an enormous need for child care. However, there is not enough child care to meet this need.

New Jersey's licensed child care centers lack capacity for about 73 percent of the infants and toddlers likely to need care. Approximately 40 percent of New Jersey municipalities are infant-toddler child care deserts, communities in which there are too few spaces in licensed child centers to meet the need. The

child care that is available is unaffordable to most families. Infant care in a center in New Jersey averages \$19,634 per year. While the shortage and unaffordability of child care affects all families, regardless of race, income, or location, it places a particularly heavy burden on families that are poor, Black, Hispanic, or live in impoverished cities or rural areas.

The lack of adequate, affordable child care harms children, parents, and the state economy as a whole. It keeps parents out of the work force--costing the state's economy \$1.7 billion per year. It has a direct relation to developmental health. It deprives children of high-quality care and education in their early years, when their brains are developing rapidly and are most vulnerable. It relegates children to care in settings that may be unreliable, unsafe, and dangerous to their heatth and safety. On the other hand, high-quality early childhood education offers one of the highest long-term returns of any public investment-more than \$7 for every dollar spent.

The need for accessible and affordable high-quality child care is widely recognized as a crucial planning issue by leading national and state agencies. The American Planners Association, for example, has emphasized its importance through its Policy Guide on the Provision of Child Care (1997) and Child Care and Sustainable Community Development (2011). likewise, the Michigan Economic Development Corporation's Redevelopment Ready Communities: Childcare Readiness Toolkit (2024) highlights child care as a key component of economic and community development.

Despite this recognition, New Jersey lacks sufficient child care facilities, which presents a major obstacle to both workforce participation and ear'ly childhood development. Currently, child care in the state is provided through two primary mechanisms: family child care homes and licensed child care centers. To meet growing demand, New Jersey must maximize the potential of both models by addressing barriers to expansion.

Barriers to New Jersey's Land Use Laws

New Jersey's land use laws and policies create significant challenges in expanding child care opportunities, limiting the establishment of new facilities and family child care homes. Key barriers include:

- Lack of Child Care Consideration in Local Master Planning: Most local master plans do not include provisions for child care, as it is not currently a required component under the Municipal Land Use Law (N.J.S. 40:55D-1 et seq.).
- Restrictive Local Zoning Laws: Many municipalities prohibit licensed child care centers in residential zones and restrict co-location with housing and commercial developments, even though these locations are most convenient for families and employees.
- 3. Misalignment Between the Uniform Construction Code and Family Child Care Standards: The state's Uniform Construction Code (UCC) does not align with the minimum safety and facility standards required for family child care homes. This discrepancy means that newly constructed residential units often cannot be used for family child care unless expensive retrofitting is done.
- 4. Legal Barriers from Landlords and Homeowners' Associations: Current state laws allow landlords and homeowners' associations to prohibit renters and homeowners from operating family child care businesses in otherwise suitable residential units. This restriction reduces opportunities for family-based child care and contributes to instability in the sector.
- 5. Lack of Incentives for Child Care in Housing Subsidy Programs: Programs like Low-Income Housing Tax Credits (LIHTC) and the New Jersey Balanced Housing Program incentivize various types of development, but do not prioritize the integration of licensed child care centers within

new family housing projects or the construction of residential units adaptable for family child care.

6. Failure to Integrate Child care in Affordable Housing Planning: While New Jersey's courts and legislature have developed a strong framework for affordable housing production through the state's constitutional prohibition on exclusionary zoning, this mechanism does not require or incentivize the inclusion of child care facilities in or near affordable housing developments.

Recommended Addition to the State Development and Redevelopment Plan New Jersey's failure to incorporate child care into its planning frameworks highlights the urgent need to include this issue in the State Development and Redevelopment Plan. ACNJ recommends the following addition to the Economic Development subsection of Section B of the draft plan:

ECONOMIC DEVELOPMENT GOAL PROMOTE ECONOMIC GROWTH THAT BENEFITS ALL RESIDENTS OF NEW JERSEY

GOALS

Promote opportunities for the creation of child care, including both licensed child care centers and family child care homes, in communities throughout the state. The lack of adequate, affordable child care harms children, parents, and the state economy as a whole.

Expanding Child Care to Support Workforce Development - Priorities

The lack of accessible and affordable high-quality child care has a direct impact on workforce participation, economic stability, and child development. Parents unable to secure child care often leave the workforce or reduce their hours, costing New Jersey's economy approximately \$1.7 billion annually in lost productivity. The shortage of child care also disproportionately affects low-income families, Black and Hispanic parents, and those in rural or underserved communities, exacerbating existing economic disparities.

Challenges and Economic Impact

- Workforce Participation & Retention: Parents, particularly women, are forced out of the workforce due to child care shortages, reducing overall labor force participation and career advancement opportunities.
- Business Productivity & Economic Growth: Employers experience higher absenteeism, turnover, and lost productivity when employees struggle with child care disruptions.
- Child Care Workforce Stability: Many child care providers struggle to afford child care themselves, limiting the supply of providers and creating a self-reinforcing cycle of shortages.
- Workforce Accessibility & Equity: Families in child care deserts face even greater obstacles in securing care, making it difficult to pursue employment, training, or educational opportunities.

Expansion of Child Care - Priorities

The shortage of accessible and affordable high-quality child care impacts children, parents, and the broader economy. Limited child care options force parents out of the workforce, deprive children of early education opportunities, and place children in settings that may be unsafe or unreliable. Research shows

that investments in early childhood education yield **more than \$7 for every dollar spent** on long-term societal benefits.

Challenges and Economic Impact

- Workforce Participation & Retention: Parents, particularly women, are forced out of the workforce due to child care shortages, reducing overall labor force participation and career advancement opportunities.
- **Business Productivity** & **Economic Growth:** Employers experience higher absenteeism, turnover, and lost productivity when employees struggle with child care disruptions.
- Child Care Supply Shortages: New Jersey's licensed child care centers can only accommodate 27% of the infants and toddlers likely to need care, leaving many families without options.
- Child Care Deserts: Approximately 40% of New Jersey municipalities lack sufficient infant-toddler care, further restricting parents' ability to work.
- Affordability Crisis: Infant care in a New Jersey child care center averages \$19,634 per year, making it unaffordable for many families.

New Jersey should plan to:

- Improve Zoning & Land Use Policies for Child Care Expansion Remove barriers that prevent child care centers from opening in residential and mixed-use developments where they are most accessible.
- 2. **Integrate Child Care into Municipal Planning Processes** Encourage municipalities to include child care in local master plans, zoning regulations, and new housing developments.
- 3. **Ensure Housing Policies Support Child Care Expansion** -Align construction regulations with family child care requirements and use housing subsidies to promote child care facilities in residential developments.
- 4. **Protect Family Child Care Providers** Prevent landlords and homeowners' associations from restricting family child care homes in otherwise suitable residential units.

ACNJ would be happy to meet with the Commission and the staff of the Office of Planning Advocacy, to provide more information on planning for child care, and discuss the draft State Plan and its implementation. ACNJ thanks the Commission for its time and attention in this matter.

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Mary E. Coogan, Bq. President & CEO

Advocates for Children of New Jersey

cc: Donna Rendeiro, Executive Director, State Office of Planning Advocacy