



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

PHILIP D. MURPHY
Governor

THOMAS K. WRIGHT
Chairman

SHEILA Y. OLIVER
LT. GOVERNOR

DONNA A. RENDEIRO
Executive Director/Secretary

**New Jersey State Planning Commission
Plan Implementation Committee
Minutes of the Meeting Held on October 20, 2021
Zoom Video Conference**

CALL TO ORDER

Chairwoman Robinson called the October 20, 2021 meeting of the New Jersey Plan Implementation Committee (PIC) order at 9:35 a.m.

OPEN PUBLIC MEETINGS ACT

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

ROLL CALL

Members Present

County Commissioner Director Shanel Robinson, Chair, County Member
Danielle Esser, Director of Governance, NJ Economic Development Authority (left at 10:55 a.m.)
Nick Angarone, Designee for Shawn LaTourette, Department of Environmental Protection
Sean Thompson, Designee for Lt. Governor Sheila Oliver, Department of State
Susan Weber, Designee for Diane Gutierrez-Scaccetti, Department of Transportation

Others Present through Video conference

See Attachment A
See Attachment B

PLEDGE OF ALLEGIANCE

Chairwoman Robinson asked everyone to recite the Pledge of Allegiance.

APPROVAL OF MINUTES

Chairwoman Robinson asked for a motion to approve the minutes of the September 15, 2021 meeting. Danielle Esser made the motion; seconded by Nick Angarone. The September 15, 2021 minutes were approved.

CHAIRWOMAN'S COMMENTS

Chairwoman Robinson did not have any comments and referred to the Director for a report.

EXECUTIVE DIRECTOR'S REPORT

Director Rendeiro did not have a report and asked Chairwoman Robinson to move to new business.

NEW BUSINESS

Open Discussion on Warehouse Sprawl Topics

Director Rendeiro introduced the topic for discussion by beginning with the statement, "We are not looking for any action today. We are looking for an open discussion on the warehouse sprawl issue." She went on to explain that the office conducted research and is working toward developing a State Plan Policy regarding warehouse sprawl. Before seeking comments from members of the Commission and public, she reminded everyone that the State Plan seeks to balance the various goals of the plan, particularly environmental protection and economic growth. This policy will be voluntary and will provide guidance to municipalities and counties to develop zoning. She also let people know that bill, S3688, was introduced in the Legislature by Senators Singleton and Sweeney that addresses the topic and puts the State Planning Commission in a position to develop guidance and procedures on how to site warehousing.

The Director received four comments that she will briefly summarize at the end of the public comments.

The Director posed a number of questions to the committee members:

- What is it that you would like to see in a State Planning Commission Policy?
- What are the pros and cons to taking a regional approach?
- What types of regional approaches make sense?
- How do incentivize greater goods movement by freight rail?
- What about high cube automation warehousing?
- Could abandoned office parks be utilized for warehouse development?
- Should warehouses be restricted to areas within the sewer service area?
- Should warehouses be prohibited from vacant farmland?
- What about forested upland sites?
- Should urban areas be considered and if so, what are the environmental justice impacts?
- How do we proactively ensure that smart growth favors Urban Cores near major ports, while dealing with environmental justice?
- Is there a legislative fix or other type of fix?

Director Rendeiro opened the discussion to members of the PIC first to address questions and concerns before opening the discussion up to the public.

Commissioner Esser said that we should encourage an efficient use of space and personally commented that warehousing is a job creator and technically a clean land use. There is a need to balance warehousing with other land uses. In general warehousing is an efficient means to moving goods and a growing industry in New Jersey,

She asked Director Rendeiro if she had facts or context in New Jersey to share before opening the discussion. What is the growth and has this historically been permitted?

The Director said that zoning is a home rule issue and should remain so. Some municipalities zoned for industrial use but did not foresee the tremendous demand and growth of warehouse applications.

During the Covid-19 Pandemic people throughout the United States ordered more goods online. Since New Jersey is located between New York and Pennsylvania, there is a greater need for warehouse distribution to meet the on-the-ground demand. Concerns are rising over local roads, infrastructure, water supply, and environmental features.

The Director cited a few examples including a letter she received that has not yet been substantiated from a property owner in Warren County that said a proposed warehouse is expected to generate one thousand truck trips travelling on a 2-lane road a day. How do we accommodate for this growth and evaluate its impact on the local infrastructure?

These issues were raised in Bill S3688 that asks that the State Planning Commission to provide a regional context before warehouses are approved that ensures the infrastructure can accommodate them, particularly for warehouses that are seeking approval on the border of a municipality. She asked how you incentivize municipalities that lack capacity to handle the growth. Perhaps you encourage inter-municipal agreements between the affected governments. The proposed legislation looks to the State Planning Commission in consultation with the relevant county as the appeals body. Similar concerns were brought to her attention in the Highlands as well as Hunterdon County. In South Jersey, concerns were raised regarding virgin farmland being developed into warehouses.

Susan Webber from DOT commented that the DOT deals with these issues all of time is concerned with impacts on the infrastructure along with the access and safety on the State highway system and looks forward to working together on this issue.

Commissioner Esser commented that this is a hard issue. She lives in a community with warehouses; understands the impacts of two-day delivery service; and needs to be mindful of Not in My Backyard (NIMBY) concerns. There needs to be a strategy to address the efficient use of land and agreed with Susan Weber's statement. The policy should provide guidance and support to the warehouse industry and make smart land use decisions. She mentioned the Governor's economic plan for clean emissions. As a homeowner, she wouldn't want a warehouse developed across the street, but warns prospective home purchasers that if you purchase a home close to highway commercial development that possibly the adjacent property could be developed as a warehouse. The guidance should offer ideas for the warehouse community and the municipal land use board to possibly require necessary screening -- a sound or visual barrier along with trees and shrubberies to minimize warehouse development and a separation of land uses. She said that the State should encourage and incentivize the reuse of underutilized land or brownfields. Locating large swaths of underutilized properties may be difficult to find, she finished with how the State Plan Map transitions from Metropolitan Planning (PA1) out to Suburban Planning Areas (PA2) and if you purchase a property for development, it should be close enough to existing development to support the new development. It should not be in forested land.

The Director offered that green space can be found near a highway mentioned but wondered whether the highways and local roads could handle the additional truck traffic. She mentioned that she received a letter that said GPS devices too often encourage truck traffic get off major roads onto local roads.

Nick Angarone, NJ Department of Environmental Protection began by focusing attention on certain issues related to the topic. DEP will review for site specific issues where we have authority but we don't have rules for protection of upland forested land. Additionally, the loss of habitat in these lands is of concern. However, DEP believes that the SPC policy should focus on regional impacts, consistent with the proposed legislation.

Mr. Angarone commented that watershed impacts will occur from the loss of trees and additional impervious coverage stormwater. The policy might have significant watershed issues. We should look at these issues at a

watershed scale. When looking at water and where it goes, one needs to consider climate impacts. Individual sites will be reviewed for that issue. They are concerned about the broader watershed impacts.

Mr. Angarone said that we need to look at the network of infrastructure. What happens when the main entrance into a warehouse is flooded and is out of commission for a period. The impacts on the secondary and tertiary infrastructure need to be considered from a climate perspective. The State is moving toward cleaner transportation but it's not there yet. Air quality impacts need to be considered, not just in the specific location of the warehouse, but also on the truck routes, because of the potential impact. DEP is seeing warehouse sprawl out in the undeveloped parts of the State as well as our overburdened communities. The State Planning Commission Policy needs to consider these impacts as well as if the legislation moves forward.

Director Rendeiro commented that we are not looking to develop a policy now. That we need a series of conversations and that this is the start.

Sean Thompson from DCA asked if we have an inventory of municipal zoning for warehouse use. Or if we know how many acres and where they are located? The Director responded that no, we do not have that data.

Sean Thompson said that keeping in mind that warehousing is only one of the potential uses on these sites. There is a process for developer to receive approvals – a developer must comply with municipal requirements – we can look into whether other measures need to be added to the requirements.

The Director responded that the proposed legislation calls for the SPC to develop a regional impact assessment guidance that would be required to be completed covering regional issues such as water, roads, infrastructure, competition, and other impacts on surrounding municipalities.

Sean Thompson agrees with Commissioner Esser and Nick Angarone's concerns.

Chairwoman Robinson agrees with her fellow Commissioners regarding everything that has been said so far. This is a lot to undertake, even just the guidance of it all. She stated that there is going to be a need for storage or warehousing to bring in the supplies regarding the clean energy/wind energy and that we just don't know the economics of it all.

Director Rendeiro commented that there were 4 written letters that she wanted to summarize before opening up the call to the public. See Attachment B for the letters.

Nick Angarone commented that he is unsure how far the Commission might ultimately go with the policy, putting aside the legislation requirements. He is very interested in possibly having the SPC consider some kind of incentive recommendation that the state might want to consider whether they be legislative or something the agencies can handle now. He is also interested in the SPC doing some level of planning and analysis around this topic. He points out that somebody may have already done this level of analysis when it comes to the incoming wind energy. There may be some market research already out there. He proposes the question of "is there some level of analysis that the SPC or OPA can pull together that might help the state and state agencies make informed decisions.

Director Rendeiro responded that Matt Blake from OPA has put something together and there has been some analysis done. Matt has looked at some of the data that is out there. When it is ready, The Director stated that she will put it all together. She wanted to hear from the general public first before putting it out as general release, which may happen after the SPC meeting. She also shared the idea of having a meeting with the interagency workshop to really dig into some of the details.

Commissioner Esser recalled that the Commission has a partnership with the Higher Ed Institution at the College of New Jersey that was assisting in some of the plan endorsement tools and resources. She thinks that perhaps they can help develop some guidance/strategies for municipalities to consider. She also mentioned doing small roundtables to help provide tools and resources so that we are ready to provide the help municipalities may need.

Director Rendeiro stated that there will be some sessions with NGO partners held and she expects a fair amount of participation. She then proceeded to summarize the 4 written comments that were received. See Exhibit B for the letters.

Director Rendeiro opened the meeting to the public.

Elliot Ruga from the Highlands Coalition starts his comment by stating that home rule is sacred in NJ, but it is a tradition and not a right. He states that according to Section 6, paragraph 2 of the NJ Constitution, the power to regulate land use rests with the legislature. It is the legislature that delegates limited powers to regulate land use under provisions of municipal land use law. It is our position that developments proposed that have impacts beyond the municipality must include the entirety of the region of impact.

Mr. Ruga recommends that at minimum, in addition to all state permitting requirements, that warehouses are not constructed on lands that will take out of production NJ's prime farmland soils and that they do not destroy the numerous natural resource values of forested lands. He also recommends that they must be adjacent to interstate highways or other transportation modality.

He also recommends that in the Highlands Planning Area that a warehouse is not approved until the SPC has been provided with a consistency determination with all applicable provisions of the Highlands Regional Master Plan from the Highlands Council. It must include a climate impact.

Nancy Grbelja from Millstone Township, Monmouth County, she used to be the Mayor and is the Deputy Mayor for Millstone Township and she says she was instrumental in developing the Master Plan for Millstone Township. They are the headwaters for five watersheds and are very active in agriculture, with crops and livestock as well. She is concerned with protecting the watershed and are currently making sure their commercial zones are located on the highways. She states that while Millstone is in compliance with affordable housing and have maintained their obligations. The impact of the warehousing and the affordable housing obligations of our community has really affected us in a negative way. All of our roads are rural, and we have great agricultural land. Millstone cannot compete with the amount of money that is being offered to landowners. First it was happening on the highways but now it is starting to come into the inner parts of the community. The warehouse folks are now demanding to rezone areas because they are going into residential areas. Nancy states that unless we really do something to protect the farmlands and that valuable asset, then we are going to lose it. Developers are demanding rezoning to industrial from farmland. There is no public transportation to the area so providing jobs is difficult for people without cars.

Ben Swartz from Morristown spoke. I am a student at the Lehigh University and doing a Community Fellowship with the Delaware Riverkeeper Network. I think everyone here accepts and respects that the warehousing issue is complex and that there's a balance between not wanting these projects in our backyard and being a necessary part of economic life. Issue comes that we look at the size and accepted risk. There was the example of the project 10 miles away from Rt. 78, which calls for 1,000 trucks a day on a two-lane road. This may look ridiculous until you look at the size of the project. The White Township project calls for 2.7 million sq. ft. split across two buildings, that's the 7th biggest warehouse in the United States and 12th biggest in world. There needs to be more guidance in what is acceptable. We're going to need to accept some, but not the 7th biggest in places like Warren County. The effect on roads and on quality of life will be significant. Many zoning ordinances haven't been upgraded in the last twenty years and do not account for how much warehousing has changed that's not even comparable. The SPC should consider the fate of the community and region and look to examples of what's happened in places like the Inland valleys in California and the Lehigh Valley Region, particularly effects on environmental justice, air pollution and traffic that are making communities unlivable, but also tools such as residential buffers. Lehigh Valley is fastest growing region in the world and that warehouse sprawl is moving over the river into NJ. We need measures in place to ensure taxpayers aren't paying for all the improvements these projects will necessitate due to added traffic.

Greg Westfall from Allentown spoke. I'm the former Mayor of Allentown Borough in Monmouth County. I'm very concerned about the warehouse sprawl that goes on unabated in central New Jersey. Earlier this year, a massive warehouse proposal in a neighboring town received local approvals that calls for 250 truck and 400 car trips per day on narrow roadways, incomplete interstate, and interchanges. Because of GPS use, traffic will be directed into the National and State Historic District of Allentown, which its narrow streets and failed intersections can't handle. The warehouse site is a State-designated birding hot spot, with over 200 identified species, including several T&E species. It is partially in farm use, has no sewer infrastructure, and is either surrounded by preserved land, or about to be. It is the hole in the donut and targeted for preservation in the town's Open Space Plan. I would encourage the PIC and the SPC when looking at policy, to consider a regional policy that addresses the roadway system and traffic, which is clearly an issue. I would encourage you to look at what is currently preserved or is intended to be, and consider the public investments being made to protect such areas, and how the siting of warehouses is incompatible with these investments and uses from an environmental and agricultural use standpoint. Farmers who have sold their development rights have made a commitment to the continuance of agriculture. Allowing truck traffic into preserved areas where farm activities are taking place on narrow roadways, interferes with farm activities. I would really like more input from the SADC and SPC and call on them to do more to protect areas targeted for preservation. We're spending millions on preserving areas now being developed and proposed for warehouses. That's not going to keep the garden in the Garden State.

Frank Marshall, General Counsel, NJ League of Municipalities - As a representative of all 565 municipalities, including both those that host these warehouses, and their neighboring communities, we obviously have a strong position on local control, especially when it comes to land use because it is the local officials and local decision-makers that know their communities the best and are in a position to make these decisions. We welcome the opportunity to work with the Planning Commission, with the State, and to receive any technical support and guidance or anything the State can put out there because it's obviously a heavy lift, and there is some impact from what one community does, going downstream to another municipality. I just wanted to say thank you to Director Rendeiro and to the Commission for letting me speak here.

Alan Hunt, Dir. of Policy and Grants from Musconetcong River Watershed Association (MWA) - Most watersheds within Musconetcong are identified as PA4B and PA-5 based on science and economic data, which is how warehouse uses should be sited. It's not NIMBY-ism that these areas are identified as such. We've recently seen two trends as it relates to the State Plan. First, there are Industrial zones that allow warehouses with more than 50% impervious surface cover just for the building itself. This is occurring in rural and environmentally sensitive areas with prime agricultural soils and habitats. Second, projects are being approved on roads requiring upgrades to carry higher truck volumes that do not directly connect to interstates, including low-weight bridges and a lack of rail access. It's a similar issue with the siting of large-scale affordable housing projects is likewise being approved without sewer service and mass transit that pose concerns for drinking water aquifers and water quality. We would ask that such projects be developed consistent with the State Plan to protect underlying resources and the recreational industries that depend on them. Thank you.

Kristen Marter, resident of Florence Township – Displayed a map showing all of the Burlington Township warehouses and the Mansfield warehouses. The goal is to have all warehouse traffic go through Route 130, but they do not. The trucks travel along the waterfront and through the local roads. Three thousand more vehicles came passed my house in a 7-day period before many of the warehouses identified here were built. The Jones Farm project has cleared the land without DEP permits. The runoff goes into Crafts Creek that is going to create additional flooding into Roebing. My concern is for the 25 warehouses developed since 2012 that are not on a major highway, in the backyards of homes in an overburdened community, per DEP website. Redevelopment designation allows overlay zones to allow warehouses, and they utilize PILOTs so schools and the fire department does not benefit. No one asks the community.

Amy Goldsmith, NJ State Dir. for Clean Water Action - While it's vitally important to protect our farmland and forests for biodiversity, stormwater protection, and climate resilience, there's been small mention of the environmental

justice (EJ) impacts by Donna and others here. We need a statewide strategy to deal with warehouses and getting trucks to zero emissions and build them with solar panels and charging infrastructure. While the cumulative impact law covers many facilities, it does not necessarily apply to warehouses. So even if you're a designated Overburdened Community, unless you have a large title 5 incinerator, the law may not apply to you, so we need other protections for communities already overburdened by pollution and social stressors. While we want to protect farmland, we also don't want to dump on the people who've been chronically exposed and harmed by polluting facilities, including warehouses. I would respectfully disagree with the Commissioner who said these facilities are clean. Clearly, there are many aspects of it that are not clean. You've heard from commenters discussing how their communities are being degraded by warehouses. The Governor has adopted executive orders, and the legislature has passed laws on EJ. The DEP Commissioner has made a commitment to EJ issues, and we need mechanisms across departments as Deputy Commissioner, Olivia Glen is charged to do, to integrate EJ elements across all agencies. Another bill, S3970, regarding zero emissions is laudable, but it only addresses trucks that originate onsite, which is a major flaw for all the emissions not covered. We'd like to see zero-emission corridors from port to warehouse, to delivery. Don't assume urban areas can take more just because it's an industrial area. They can't. Clean Water Action is in process of organizing a campaign around this issue. Thank you.

Britta Forsberg, Executive Director of Save Barnegat Bay - I'm sharing an image of the largest project we've seen in the watershed. This one is in Jackson, known as Adventure Crossing, and gives you a sense of size and scope of these projects. This development was a forest cleared prior to development approvals. The project entails a 14 acre and a 9 acre warehouse development that's bordered by a dirt road and a two-lane traffic signal that will likely necessitate major infrastructure improvements. This is a major change to the community, to safety, and to roadways. Other concerns are the loss of habitat, drainage, air quality, and site design. It includes housing and ballfields sited next to truck traffic, including 400 truck trips per day with traffic that will share local roadways and intersections with amusement park congestion. Not only did the project undergo numerous changes, but was reviewed during Covid, which challenged opportunities for meaningful public participation. A second project is in Plumsted that was a farm. Part of it was preserved, but the frontage along the narrow roadway is up for warehouse development. It's an example of a rural farming community subject to major change. The third project is in a redevelopment area in Berkely along Route 9, in an area that is not ready to handle either stormwater or traffic impacts. In all cases, local planning boards and officials are struggling to meet the many demands presented by these projects and interconnected issues. I think there is a distinct role for a larger planning vehicle.

Tim Evans, Research Director of NJ Future - What I haven't heard from the discussion is the distinction between the types of warehouses, and the question of what to do about them, which depends on the size. There is an important distinction between what economists refer to as retail industries versus. Basic industries. Retail industries appear anywhere where people are living; not just traditional retail and restaurants, but also medical offices, commercial, and smaller last-mile warehouse operations that function more like retail, and in some cases are replacing them, and that should be treated similarly. While decisions about where to put them do affect neighboring communities, so do a lot of other things, and that's a larger issue that we shouldn't try and solve on the back of the warehouse question. It's the bigger facilities that we ought to be concerned about. They can't go just anywhere and want to be near the port. We should concentrate on those for whatever role the SPC and OPA play. We should have a cut-off, below which we treat it like any other land use, and above which would argue for the State involvement. (Director Rendeiro commented that the way the current legislation is written, the SPC would define what constitutes a larger project). I think that's right, and you guys can do that with help from the industry. They know the purpose and various kinds of facilities and can tell you which should be near the port vs. those that can go anywhere. It is the larger ones that argue for State involvement so that sites that are ideal for them don't get directed for some other land use. As a second choice, they want to be as close to the highway as possible. To the extent that we can help them get closer, I think we ought to do that. As available redevelopment sites in industrial areas near ports are getting scarcer, we should consider defunct office parks and retail centers that are located near highways in suburban areas. The SPC should work with the industry and municipalities to help identify these areas.

Mike Pisauro, Policy Director Watershed Institute - Emphasized the need for SPC to provide guidance for regional planning for applications and in development of zoning. One municipality's zoning can negatively impact a neighboring municipality. Once zoning is in place, there are no tools to say no even if there are negative impacts. Neighboring towns need more guidance and tools to have input before zoning is in place. An Area in Need of Redevelopment designation especially can have negative impacts and neighboring towns aren't notified in the planning stage and have no venue to discuss. All benefits to area in need; all negative impacts to neighbors – truck traffic with no obligation to discuss with the neighboring towns.

After Henri and Ida, towns are thinking more about flooding but even if a town implements stormwater and floodplain anagement initiatives, provide healthy riparian zones and does everything right, if the upstream towns don't do the same, they will still have the same impacts. Not having tools for regional planning has repercussions with air quality, traffic, stormwater and flooding and other issues in addition to warehouse concerns. Siting of office parks, strip malls, housing development would all benefit from the SPC/legislature developing regional planning tools for municipalities to use.

Pat Brown from Allentown - Appreciates the important discussion, hopes it continues. Home rule may be a tradition (per Elliot Ruga) but what about the MLUL? It says benefits should substantially outweigh detriments to public good – for whom? It also says that development in any municipality should not conflict with development or general welfare of neighboring municipalities, the county or the state, and preservation of the environment, promotion of the conservation of historic sites and districts, open space, and energy resources. Allentown is a shore traffic throughway - with 10-13,000 vehicles per day pass seasonally through this .6 sq mi town with 220 historic buildings (figures based on \$310k study with Commissioner Arnone). Crosswicks Creek/Doctors Creek already has flooding issues and neighboring towns don't have wastewater treatment, want to go under highways and hook up with other systems. Two 500,000 sq ft warehouses are proposed (including moving wetlands) would have 50' machinery that's taller than the local fire company's equipment and the additional 250 tractor trailers per day would be too much for the small lanes – trucks are already negatively impacting the historic foundations, reviewing alternatives.

Walter Lane, Somerset County Planning Director - Need for regional planning highlighted by this discussion especially county planning can be an asset in this process (even though they don't have land use jurisdiction, they can bring a regional approach to a policy. Also acknowledged the importance of the State Plan in this discussion.

Director Rendeiro agrees that the counties have a huge role in regional planning.

Rhyan Grech, Pinelands Preservation Alliance - This is a complicated issue but keep in mind that the reason we have a climate crisis is because we didn't consider/preserve our natural resources in the past when developing the state. Adding thousands of acres of impervious surfaces (warehouses) when we already have stormwater and flooding issues should give us pause and the SPC should carefully consider our natural resources first. The warehouse industry is well financed and can pressure municipalities to change their zoning; SPC should take seriously the mistakes of the past and err on the side of conservation.

Fred Stine, Delaware Riverkeeper Network - Another vote for Watershed based planning and for SPC developed guidance giving municipalities the natural resource tools and data that they need to make decisions based on ecosystem services. Also, provide data and information on the economic contribution of the existing outdoor recreation and ecotourism as a vibrant economy that could be impacted negatively by warehousing with light pollution, water quality degradation and truck traffic.

Another consideration; regulations for limitations on truck drivers DOT permitted time on the road before mandatory rest could be driving siting of warehouses in remote locations to serve as informal rest stops.

Kristan Marter - Impervious cover not allowing aquifers to recharge; salt-line moving up the Delaware River for lack of freshwater recharge thus cumulative impact of warehouses should be considered.

ADJOURNMENT

With no further comments from the Committee or the public, Chairwoman Robinson asked for a motion to adjourn. The motion was made by Nick Angarone and seconded by Sean Thompson. All were in favor. The meeting was adjourned at 11:28 a.m.

Respectfully submitted,



Donna Rendeiro, Secretary
State Planning Commission
Dated: January 19, 2022

ATTACHMENT A

**NEW JERSEY STATE PLANNING COMMISSION
PLAN IMPLEMENTATION COMMITTEE
ATTENDEES
OCTOBER 20, 2021**

Brianna Keys - Policy Advisor, Office of the Governor
Walter Lane – Planning Director, Somerset County
Jelena Lasko - NJDOT
Keisha Cogdell - Register Nurse, United Health Care
Nancy Grbelja - Millstone
Jason Kasler - NJPO
Pat Brown - Allentown
Karen Argenti - Barnegat Bay
Britta Forsberg - Save Barnegat Bay
Ben Schwartz - Columbus and Mansfield Twp.
Frank Marshall NJLM
Judith Henckel -
Mark Villinger - Ocean County
Amy Goldsmith - Director, Clear Water Action
Amy Hansen - NJ Conservation Foundation
Fred Stine - Delaware River
Alan Hunt - Director of Policy, Musconetcong Watershed Association
Dave Dech - Warren County, Planning Director
Rhyan Grech - Pinelands Preservation
NJ Highlands Coalition
Tim Evans - NJ Future
Tori Kemp - Ocean County
Greg Westfall - Former Mayor, Allentown Borough - Monmouth County
Julia Somers - NJ Highlands Commission
Mike Pisauro - Policy Director, Watershed Institute
Mirah Becker - PP, AICP Supervising Planner, Middlesex County
Maryann Carroll - DRGP - Delaware River Greenway Partnership
Elliot Ruga - NJ Highlands
Meg Caanagh - NJDEP
Mike King - Board member, Phillipsburg Review Organization
Caroline Wittlke -
Andrew Gold -
Amy An -
Ashley -
Nikita Biryukov -
Kristan Marter -
Marcella Traina -
Micah Rasmussen -
Bob T. -
Matt -
Carl Schwartz -

October 19, 2021

Dear State Planning Commission Members,

Thank you for your focus on the impact of warehouse sprawl in New Jersey. For many years, we have known our state could become the first to be fully built-out. What I don't believe most New Jerseyans have yet come to appreciate is just how close we are. Of all the developable land in the state, we may have about half a million acres left. This may sound like a lot until you see it swallowed up 50 and 100 acres at a time by single-building footprints—and by a single industry with a cumulative impact of as much as 10,000 greenfield acres every year. As a state, state government, and administration, our actions and inactions each and every month are having a measurable and permanent consequence.

We must be more deliberate and careful in prioritizing what may be New Jersey's most valuable limited resource, because if we fail to do so, it will simply be consumed without regard for priority or purpose.

If ever there was a need for statewide planning, industrial warehouses are begging to be the poster child for it. Their impacts cannot be contained within an approving municipality's border. My own community's rural roads were completely overwhelmed during one warehouse's Christmas rush a few years ago. We could not get our kids to and from school. Leaving a neighboring community's municipal-based land use planning to sort out another community's-- and the rest of the state's-- significant transportation and traffic impacts means relegating it to failure. This reality being felt in North, Central and South Jersey. It has been perhaps most authoritatively documented by the Turnpike Authority's Moving Mindfully Study—but it is being painfully experienced across the country—from California's to Pennsylvania's warehouse valleys. It is not limited to roads—it can be measured in particulates in our air and in the lungs of the families who live in the homes, backyards and residential areas that developers are now building up against.

The health impacts of leaving warehouse sprawl to be reviewed as local land use decisions do not stop at one municipality's border. We know our municipal governments and leaders, who have perpetually operated under budgetary constraints, are particularly ill-equipped to objectively consider the merits of a proposal that will have a material effect on their finances. Again, we can ignore this temptation to chase a ratable, but ignoring it does not make it any less so.

The New Jersey State Planning Commission must review every proposed development in excess of a specific threshold in greenfield acres—perhaps 50 or 100. The review process must be rigorous, and encourage non-greenfield redevelopment. It must have a mechanism to review regional and statewide impacts, and the regional and statewide tools to be able to address them.

Thank you again for your focus on this most important impact on the future of New Jersey.

Sincerely,



Micah Rasmussen

1752 Robin Hood Road
Mount Bethel, PA 18343
October 19, 2021

New Jersey State Planning Commission
P O Box 820
Trenton, NJ 08625-0820

Executive Director/Secretary Rendeiro:

I would like to take the opportunity on behalf of our Concerned Citizens of Upper Mont Bethel Township in Northampton County Pennsylvania within sight of the Delaware Water Gap and Appalachian Trail to add to the comments from our river communities about warehouse sprawl.

Our concerns are for the Wild & Scenic Delaware River viewshed and environmental degradation of 725 farm and forested acres with a 300 foot slope down to the other 165 acre flat river frontage of the Portland GenOn peaker power plant site. Concept planning includes a number of the 15 buildings up to 100 feet in height. That disregards the forested rural communities gateway to the Delaware Water Gap National Recreation Area for the benefit of Wall Street scale investment.

The river may divide the states geographically and politically, but the bridges bind us with the traffic. We are very concerned that the urban scale industrial complex has advertised to bring traffic in from and back to Route 80 in New Jersey to New York. We already hear from communities downstream on both sides of the river that large trucks cannot navigate the bridges and backroads that GPS showed as a shortcut. Their answer to future traffic increase is to build larger interchanges. This does not address the added burden to the small local roads such as PA Route 611 and NJ Routes 46 and 519. Perhaps we can look to a future of automated driverless trucks that are programed to the main interstates. In the meantime, we are left with air and noise pollution, safety risks and loss of quality of life.

Our hope is for your Commission to promote a vision for future planning that embraces needs of the built communities with the remaining natural environment that we and our planet increasingly depend on.

Respectfully,

Judith Henckel



c/o Delaware River Greenway Partnership

PO Box 15, Stockton, NJ 08559

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October 20, 2021

Donna Rendeiro, Executive Director
NJ State Planning Commission
Department of State
P.O. Box 820
Trenton, NJ 08625-0820.

Dear Ms. Rendeiro,

The Lower Delaware Wild and Scenic River Management Council (LDWS) submits these comments in anticipation of the warehouse sprawl discussion scheduled for the Plan Implementation Committee meeting today.

Wild and Scenic Rivers Background

The Lower Delaware is a National Wild and Scenic River System segment, established by Congress on November 1, 2000, as Public Law 106-418. The segment includes 65.6 miles of River which form the Pennsylvania and New Jersey border, plus named tributaries. The National Park Service (NPS) is responsible for the long-term protection of the River and administers the Wild and Scenic Rivers Act.

NPS works closely with the Wild and Scenic Management Council, created through the designation as an advisory and coordinating body. The Council is comprised of representatives from local, state, and federal governments, as well as environmental nonprofits. The Lower Delaware River Management Plan (August 1997) was developed as a part of the Wild and Scenic River Study, approved by all State and local parties, and referenced by Congress as the Plan by which the Wild and Scenic River would be managed. It identifies ecological resources and water quality as key attributes of the River that must be "protected and enhanced."

Lower Delaware Geography

The "Lower Delaware," includes River segments from Easton, PA to just north of Trenton, NJ, as we are a bilstate group. It spans from river mile 193.8 to the northern border of the City of Easton, from south of the Gilbert Generating Stations to north of the Point Pleasant Pumping Station, from South of the Point Pleasant Pumping Station to 1,000 feet north of the Route 202 Bridge, and from 1,750 feet south of the Route 202 bridge to Washington Crossing. Additionally, some Pennsylvania tributaries are designated including Tinicum Creek, (headwaters of two upper branches to the Delaware River confluence), Tohickon Creek, (downstream of Lake Nockamixon to the Delaware River confluence), and Paunacussing Creek, (portions passing through Solebury Township to the Delaware River). The Musconetcong River, (3.5 mile stretch from Saxton Falls to Route 46 and the 20.7 mile stretch from King's Highway Bridget to railroad tunnels at Musconetcong Gorge), was designated in 2006.

Observations and Concerns About Warehouse Sprawl

We wish share observations about the exploding phenomenon of warehouse sprawl in Pennsylvania and New Jersey. Examining this emerging issue is incredibly urgent for the small communities flanking the Delaware River in Warren, Hunterdon, and Mercer Counties. The anticipated impacts of warehouse developments on the River, on small

communities without updated transportation infrastructures, and the long-term effects on the visual and physical environment, will be significant and irreversible.

For example, in the Lower Delaware corridor, a project was approved last month for warehouses to be constructed in Tinicum Township, PA along the Tohickon Creek (Bucks County) and a massive project is under review in Upper Mount Bethel, PA (Northampton County) with 100-foot-tall structures proposed along the River. While these warehouses will be located on the PA side of the Delaware, they will certainly change the scenic viewscape from NJ.

Most concerning to NJ residents and officials will be the added traffic these and future PA warehouse developments will generate. Trucks traveling to and from many PA sites will be driving over river bridges for highway access in NJ. In particular, we have been tracking a 600-acre project in White Township (Hunterdon County). This project, if built, will be visible by recreational users on the River. It will add unimaginable amounts of impervious cover to the area and will feed tractor trailer traffic through two small adjacent hamlets where no transportation improvements are planned or could realistically be built.

Similar projects are also being considered in Franklin Township (Warren County) with the same kind of implications. Just this week we heard from a resident of Franklin Township who believes new tractor trailer traffic could literally halt travel during peak times on country roads because without designated waiting areas, trucks will be forced to park on local roadways until they are permitted enter the warehouse developments. This scenario could have measurable impacts to routine personal, school, and emergency vehicle travel.

With the convenience of constructing warehouses in rural areas due to availability of land, new projects will continue to be proposed along the Lower Delaware Wild and Scenic corridor. We hope you can provide guidance to NJ municipalities and counties with pending and future projects as to lessen the negative impacts of these developments on the environment and to the quality of life in sleepy Delaware River communities. Now after Hurricane Ida we are reminded that impervious cover contributes to flooding ever more so in an era of climate change. Erosion will increase, water quality will decrease, and infrastructure improvements as a result are desperately needed.

Last, keep mind the recreation economy in this region has boomed the last two years. While warehouse developments brings ratables, the same land can be used for tourism related businesses while maintaining the amazing viewshed that draws visitors to the region. Our Council is willing to work with State representatives to discuss how to promote recreation in our changing economy.

For your information, we welcome a representative of the State Planning Commission to join our Steering Committee or attend our Council meetings. This could be a staff member or appointed volunteer. The next virtual meeting of the Lower Delaware Wild & Scenic River Management Council will be held on Thursday, December 16 at 10:00 AM. The meeting notice and agenda will be posted at www.lowerdelawarewildandscenic.org. Thank you for your consideration.

Sincerely,

Richard Dodds

Chairman

cc: Sarah Bursky, Lower Delaware Liaison, National Park Service (NPS) (Sarah.Bursky@nps.gov)
Maryann Carroll, Ex. Dir., Delaware River Greenway Partnership (maryann@delawarerivergp.org)
Marion Kyde, Vice Chair, Lower Delaware Wild & Scenic River Management Council
Jodee Inscho, Director of Community Affairs, Delaware River Joint Toll Bridge Commission
Stacey Mulholland, Government Affairs Lead, Delaware River Basin Commission
Sarah Sayed, Member, Lower Delaware Wild & Scenic River Steering Committee
Adele Starrs, Mayor, Knowlton Twp, NJ
Becky Brady, Executive Director, Lehigh Valley Planning Commission, Allentown, PA
Alan Hunt, Policy Director Policy and Grants, Musconetcong Watershed Association
Julia Somers, Executive Director, NJ Highlands Coalition

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October 15, 2021

Donna Rendeiro
Executive Director/Secretary
New Jersey State Planning Commission
PO Box 820
Trenton, New Jersey 08625

Dear Ms. Rendeiro,

I am writing to express my sincerest thanks to the New Jersey State Planning Commission for discussing the topic of "warehouse sprawl". As you are likely aware, this is a significant challenge facing Warren County and our 22 municipalities.

I strongly support the home-rule governing style New Jersey entitles, and as a former mayor I understand the benefit of having localized planning. Local jurisdictions know what is best for their communities, but when local leaders only focus on tax rates and their immediate area, the bigger picture can be forgotten for the worse. "Silo" thinking and planning is too pervasive. We are seeing real issues when neighboring municipalities who have no say in another jurisdiction's approval process, are then forced to deal with adverse impacts such as increased traffic, pollution and usage on existing infrastructure.

Over a year ago, Warren County partnered with the New Jersey Highlands Council and provided a light industrial traffic study which concluded that roadway levels of service would deteriorate to unacceptable conditions at most analyzed intersection locations and mainline segments of CR 519, as well as other key intersections throughout the County. I have enclosed this report for the commission's review.

Understandably local action is needed to address the zoning of warehouses, but it is of my opinion that State action is desperately needed to help curtail the proliferation that is taking place both in our county and around New Jersey.

Donna Rendeiro
Executive Director/Secretary
New Jersey State Planning Commission
October 19, 2021
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Again, many thanks for you taking on this issue and look forward to any partnership or assistance I can offer.

Sincerely,

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

James R. Kern, III
Commissioner Director

Enclosure

c: Honorable Governor Phillip Murphy
Lisa Plevin, Executive Director, New Jersey Highlands Council
David Dech, Warren County Planner