



## Letter to State Planning Commission on Draft State Plan

April 22, 2009

137 West Hanover Street  
Trenton, NJ 08618  
(609) 393-0008 Tel.  
(609) 393-1189 Fax  
[www.njfuture.org](http://www.njfuture.org)

**Contact:** [Peter Kasabach](#), Executive Director, 609-393-0008 ext. 104

Dear State Planning Commission member:

As an organization founded, in part, as a watchdog for the State Development and Redevelopment Plan, New Jersey Future is pleased that the latest rewrite is progressing and looks forward to its final release. This plan represents countless hours of review and recommendations from municipal, county and state levels. An up-to-date State Plan is critical for the continued progress of smart growth in the state, both as a best-practices guide for municipalities regarding growth and development issues and as a strategic vision around which state agencies can align their policies and priorities.

Having one strategic plan to guide growth and development in the state is even more critical today as the state seeks to encourage economic growth through targeted investments while meeting its greenhouse gas reduction goals. In our view, the Governor should recast the State Planning Commission as his tool to coordinate the land use changes needed to realize his ambitious greenhouse gas reduction targets and his economic growth goals. He should direct state agencies to use the plan to guide their land use-related activities, including program development, capital investments and regulations. Such coordination can ensure that state agency efforts reinforce – rather than undermine – each other, with complex initiatives such as increasing affordable housing and protecting environmental resources.

While New Jersey Future is eager for a new State Plan, there are several aspects of the draft plan before the State Planning Commission that should be addressed before the final version is released.

- 1. Accessibility to the Reader-** We are concerned that readers, especially local government officials and members of the public, will find the State Plan difficult to digest. The current version of the draft final plan is nearly 400 pages long. The second volume alone, which contains statewide goals and policies, is over 200 pages. In that volume, a large amount of space is dedicated to background information, which, while helpful, can obscure the policy statements that make up the ‘meat’ of the section. Thought should be given to how these sections could be pared down to make them more accessible. Additional background, framing and details can be handled as appendices or reference supplements.
- 2. Policies instead of Recommendations-** The State Plan includes policies (decision making guides that achieve rational outcomes) and recommendations (new activities that the state and other entities should engage in). We believe the plan would be a more effective tool if it included only policies and eliminated recommendations. There are several instances in Volume 2 where the plan makes specific recommendations. The situation becomes even more confusing where these recommendations are clearly outside the scope of the State Plan.

and of the State Planning Commission's control. For example, policy 15 under the Energy Resources policy, calls for the creation of an Energy Institute "to support basic and applied energy-related research and development by public utilities, other industries and the State colleges and universities". While a worthwhile goal, specific recommendations such as these are out of place in the State Plan, which is meant to provide a set of guiding principles for the actions of state and local government. Such recommendations undermine the Plan's credibility and should be removed.

3. **Integration with the Global Warming Response Act (GWRA) Recommendation Report** - We applaud the inclusion of a new goal and related policy section on climate change. However, the draft contains no specific language calling for a formal relationship between the State Plan and the land use aspects of the state's forthcoming Global Warming Response Act Recommendation Report. To integrate these documents, the GWRA report should designate the State Planning Commission as the Governor's tool to coordinate the land use changes needed to achieve greenhouse gas reductions. The State Plan should recommend that the land use components of the GWRA report be incorporated into the State Plan once they are finalized.
4. **The State Plan Map** - We support adoption of the State Plan Policy map, with the recognition that it represents a "snapshot" and will need to be amended in the future as conditions on the ground and related state plans and policies evolve. We support the new language in the implementation section on this topic, but recommend that it: 1) refer to the adopted regulations governing state plan map amendments; 2) suggest the role that counties can play in recommending map amendments, especially related to wastewater planning; and 3) recommend plan endorsement as one avenue for local governments to recommend map changes.

Above all however, we urge that the plan be finalized and released as soon as possible. Everyday decisions are being made with regard to growth and development issues in the state that will have impacts for decades to come. Without a current State Plan in place to guide those decisions, we risk undermining our efforts to achieve the state's goals of promoting economic development while reducing greenhouse gases. With this letter you will also receive a copy of our more detailed comments on the draft plan. Both this letter and those comments were developed based on the previous draft of the plan, which was released in March, though we feel that our comments are still very relevant to the current draft. We look forward to working with the Commission to refine and finalize this draft in order to provide a blueprint for development and redevelopment in the state.

Sincerely,

Peter Kasabach  
Executive Director, New Jersey Future