



## Comments on New Jersey's State Plan Update

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Thank you to the New Jersey Office of Planning Advocacy (OPA) for beginning the state plan update process and offering us the opportunity to provide feedback on the plan's goals and strategies. New Jersey Future supports the effort to update the plan and our staff coordinated to offer several recommendations to improve its effectiveness. Here are sections of the plan that we think need clarification, and our recommendations:

- I. The State Plan Update and the Garden State Values**
- II. Recommendations for Updating the 2021 State Plan Goals and Strategies**
  - A. Goal #1: Revitalize the State's Cities and Towns Strategy**
  - B. Goal #2: Conserve the State's Natural Resources and Systems**
  - C. Goal #3: Promote Beneficial Economic Growth, Development and Renewal for All Residents of New Jersey**
  - D. Goal #5: Provide Adequate Public Facilities and Services at a Reasonable Cost**
  - E. Goal #6: Provide Adequate Housing at a Reasonable Cost**
  - F. Goal #8: Address the Negative Impacts of Global Climate Change**
  - G. Goal #9: Prevent the Concentration of Adverse Environmental impacts in Overburdened Communities**

### **I. The State Plan Update and the Garden State Values**

The goals in the 2001 State Plan are dated in perspective, formatting, and language. They should be rethought. For example, much of the framing is about poor urban areas. This isn't an accurate frame today. Also, the narrative associated with each goal is too long. They need to be more concise and less redundant. Consider using SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) goals, which would be a significant departure, but might be more useful. Also, the scope of the plan should remain narrow and focused on land use, bringing each of the goals back to land use. The State Plan has the best chance of succeeding if it can stay focused and outcomes can be measured.

Below are the Garden State Values that were created in 2012 and represent a more contemporary view of state planning goals. Consider using this framework or integrating the structure and words into the new goals.

#### ***Garden State Values Preamble:***

*Working for Smarter Growth...More Livable Places and Open Spaces*

*To address the statutory requirement of the Act to coordinate planning activities and establish statewide planning objectives and to promote development and redevelopment in a manner consistent with sound planning where infrastructure can be provided at private expense or with reasonable expenditures of public funds this Plan focuses on best management practices to ensure that those engaged in the planning and execution have a roadmap to success and predictability regarding the type of development and redevelopment the State will put resources behind. To that end, the SPC is establishing the Garden State Values. These values will be used to advise the Priority Growth Investment Area criteria, referenced above.*

*These values reflect the appropriate balance of channeling growth toward existing infrastructure, promoting urban and first tier suburban redevelopment initiatives, protecting critical natural resources and promoting healthy lifestyles. These values will be the basis for future discretionary State investment through the scorecard system discussed under Goal 4.*

### **Garden State Values:**

#### **#1) Concentrate Development and Mix Uses**

- *Promote development in Priority Growth Investment Areas that are compact, conserves land and offers shopping and services within convenient walking distance of home and jobs. Build with suitable designs and densities that support walking, biking and public transportation.*

#### **#2) Prioritize Redevelopment, Infill, and Existing Infrastructure**

- *Strengthen cities, towns and neighborhoods by prioritizing redevelopment, the reuse and remediation of existing sites and structures, and construction on infill sites that are compatible with surrounding uses. Upgrade existing infrastructure where needed, before adding new capacity. Encourage sustainable development that incorporates green design and construction principles and opportunities for renewable energy and efficiency.*

#### **#3) Increase Job and Business Opportunities in Priority Growth Investment Areas**

- *Provide opportunities for investment near housing, infrastructure and transportation. Support economic growth by addressing the land use and infrastructure needs of targeted industries and areas, consistent with these principles.*

#### **#4) Create High-Quality, Livable Places**

- *Ensure each community offers an environmentally healthy place to live, work and play. Enhance community character and design, especially in historic areas, by reusing significant buildings, reinforcing architectural styles and providing pedestrian-friendly streetscapes. Improve community plazas and parks and connections to waterfront areas.*

#### **#5) Provide Transportation Choice & Efficient Mobility of Goods**

- *Maintain and enhance transportation options that improve access, safety, affordability and air quality for all users: walkers, bikers, transit-users, ride-shares and drivers. Improve strategic freight and public transportation infrastructure that supports sound economic growth. Encourage options for low emission and alternative fuel vehicles.*

**#6) Advance Equity**

- This was a relic of the Christie Administration. It needs to be updated to actually address racial and economic equity. *Consider the equity of property owners during planning and implementation. Improve access to opportunity, housing, jobs and schools for all New Jersey residents.*

**#7) Diversify Housing Opportunities**

- *Support construction and rehabilitation of homes that meet the needs of households of all sizes and income levels, located near jobs and transit and where services are available.*

**#8) Provide for Healthy Communities through Environmental Protection and Enhancement**

- *Protect and restore the environment, sensitive lands, ecosystems and natural resources. Ensure healthy places through an increase in the quantity and quality of preserved land. Improve quality of air, water and land. Reduce energy use, carbon emissions, water degradation and other impacts of development.*

**#9) Protect, Restore and Enhance Agricultural, Recreational and Heritage Lands**

- *Support agriculture and locally-grown food consumption through protection and preservation of farmland. Protect agricultural, historic sites and landscapes. Provide accessible neighborhood parks and recreational systems.*

**#10) Make Decisions within a Regional Framework**

- *Maintain up-to-date, coordinated local, regional and State functional plans that reflect these principles and can provide a regional framework for making decisions about capital investments, programs, regulations and development applications. Gather and consider public input.*

**II. Recommendations for Updating the 2021 State Plan Goals and Strategies**

**A. Goal #1: Revitalize the State's Cities and Towns Strategy**

- The term revitalization may not be appropriate. Rework to address goals of revitalization across the board and embed equity into this.
- Address racial and economic segregation here.
- This goal could be re-oriented to focus more on redevelopment.

**B. Goal #2: Conserve the State's Natural Resources and Systems**

- Actively protect and restore the state's natural systems, including sensitive lands, ecosystems and natural resources, as capital assets of the public environment.
- Ensure healthy places and accessible neighborhood parks and recreational systems for all New Jerseyans through an increase in the quantity and quality of

preserved land, with particular emphasis on historically disadvantaged communities. Build interconnected greenways and trail systems.

- Support agriculture and locally-grown food consumption through protection and preservation of farmland.
- Actively protect priority conservation lands through enlightened regulations, targeted acquisitions, flexible development regulations and effective incentive programs for both public and private sector compliance. Where appropriate, deploy strategies to minimize development footprints, site disturbance, tree removal, habitat fragmentation, impervious coverage, greenhouse gas emissions and the use of toxic ingredients like harmful pesticides.
- Adopt nature-based strategies and solutions, wherever feasible, to address the detrimental impacts of stormwater runoff, urban heat island effects and other impacts of global climate change.
- Improve quality of air, water and land. Reduce energy use, carbon emissions, water degradation and other impacts of development.

### **C. Goal #3: Promote Beneficial Economic Growth, Development and Renewal for All Residents of New Jersey**

- The state plan should consider adding all kinds of infrastructure (actually spell it out) including water. Water is often invisible.
- Update word choice from “the poor and minorities”.
- New Jersey needs to provide a water workforce pathway for all residents and job seekers interested in pursuing employment in this sector.
  - A great opportunity exists to train this workforce with our 18 community colleges.
  - They can support water sector utilities throughout the state by offering water workforce pathways.
  - Because community colleges are spread throughout the state, they can partner with water sector utilities to build collaborative initiatives for the water workforce.
  - This can also connect to the environment goals and equity goals, affordability, and innovation.

### **D. Goal #5: Provide Adequate Public Facilities and Services at a Reasonable Cost**

- Provide infrastructure and related services in a timely and efficient manner. Upgrade existing infrastructure where needed, before adding new capacity. Strategically deploy state and federal funding for water, transportation, energy and other public facilities and services to ensure equitable service for all residents, maximize efficiencies, protect public health, improve climate resilience, support economic development, and ensure affordability in overburdened and disadvantaged communities.
- Provide transportation choice and efficient mobility of goods. Maintain and enhance transportation options that improve access, safety, affordability, climate

resilience, and air quality for all users: walkers, bikers, transit-users, ride-shares, and drivers. Build a statewide trail network. Improve strategic freight and public transportation infrastructure that supports sound economic growth. Encourage options for low emission and alternative fuel vehicles including bikes and scooters.

- For water infrastructure (drinking water, wastewater and stormwater) systems, encourage or require the use of infrastructure needs assessments, asset management, and life-cycle costing along with an integrated “one water” approach that addresses public health, climate resilience, and affordability concerns. Require water utility systems and land use planning agencies to publish joint assessments of the demand for, and supply of, water services on a regular basis. Limit the provision of public water systems to areas appropriate for compact growth consistent with watershed planning.
- Align the provisions of the state’s Energy Master Plan with State Plan center-based land use priorities. For example, focus state incentives for renewable energy development on rooftops, parking lots, and brownfields, and only on open lands where consistent with State Plan goals for environmental protection and agriculture. Prioritize subsidies for electric vehicle (EV) charging facilities and broadband communications in State Plan growth areas.

#### **E. Goal #6: Provide Adequate Housing at a Reasonable Cost**

- Diversify housing opportunities. Support construction and rehabilitation of homes that meet the needs of households of all sizes and income levels, with higher densities in centers and locations near jobs and transit.
- Consistent with the New Jersey State Constitution, assure a steady supply of new and refurbished demographically-appropriate housing, including housing affordable to very-low, low- and moderate-income households, in appropriate locations statewide.
- Seek municipal changes from exclusionary zoning to zoning (specifically inclusionary zoning) that allows for communities that are integrated in terms of both race and income, and supports compact, walkable communities.
- Focus state housing subsidies to attract investment in weak market communities without reinforcing racial or economic segregation. Encourage or require land use tools to minimize displacement of low income residents and small businesses.
- Mitigate toxic legacy conditions, such as lead and asbestos, found primarily in older housing stock, particularly in historically underrepresented communities.
- Complement Energy Master Plan goals for housing decarbonization.

#### **F. Goal #8: Address the Negative Impacts of Global Climate Change**

Some of these recommendations are too detailed for the Goal and Strategies, but we hope they are helpful as you draft those sections and more detailed forthcoming sections.

- Expand the goal statement to address the root cause of climate change in New Jersey, which is greenhouse gas (GHG) emissions, in addition to addressing climate adaptation. Also, leverage any “positive” consequences, such as which crops to grow, where to focus economic and development growth (including in relation to intra- and inter-state climate migration), a longer tourist season, etc., to meet the goal.
- There has been an emphasis on transportation decarbonization, but there needs to be a stronger emphasis on building decarbonization. The transportation sector accounted for the highest percentage of New Jersey’s GHG emissions in 2020 at about 34%, while the building sector accounted for the second highest at about 23%.<sup>1</sup> Therefore, residential and commercial building decarbonization is needed to complement transportation decarbonization, otherwise the state is only addressing part of the issue. It is especially important for decarbonization to apply to retrofits and not just new constructions in order to be most effective. This applies to energy use/utilities, as well as construction materials type and extraction (cradle to grave sourcing).
- There needs to be a transition to a low-carbon alternative transportation economy.
  - This means designing walkable, transit oriented communities in order to respond to climate change.
    - To do so, the state should incentivize the right behavior and design (sidewalks, bike lanes, TOD, etc).
    - The state needs to increase funding and staffing for NJDOTs technical assistance program for bicycle and pedestrian infrastructure.
- The state should have a clear plan for grid modernization.
  - Modernizing the grid is important for ensuring all regions have reliable energy access.
- The state should provide a climate change adaptation regulatory process that determines:
  - When to stop investing in specific infrastructure
  - When to invest in protection measures
  - When and how to invest in transition measures
- The state should develop measurable climate change adaptation targets at local and state levels.
- The state should establish a special resource area for the coast. Coastal communities will need more capacity and resources to plan for and address the impacts of climate change. Designating the coast as a special resource area will provide the additional resources these communities need.
- Goal should prioritize environmental justice (EJ), managed retreat, natural restoration, sustainable agriculture, zoning reform, and reduction of greenhouse gasses
  - Address compounding effects of climate hazards on public health in EJ

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<sup>1</sup> [https://dep.nj.gov/wp-content/uploads/ghg/2022-ghg-inventory-mcu\\_final.pdf](https://dep.nj.gov/wp-content/uploads/ghg/2022-ghg-inventory-mcu_final.pdf)



- and lower income communities.
- Ensure people and property are not exposed to climate hazards and are not negatively impacting ecosystem services to sequester carbon and provide a physical buffer or filter.
  - Transition infrastructure and economies to areas that are not directly exposed to natural hazards such as flooding, mudslides, and wildfires.
  - Support cities to be healthy socio-ecological systems and provide ecosystem services to mitigate urban heat island impacts, provide access to nature for people, and contribute to sustaining healthy air, soil, and water in cities.
  - Create and manage undeveloped lands to be self-sustaining healthy natural area ecosystems that provide ecosystem services, including carbon sequestration, in addition to public access as appropriate.
  - Support agricultural practices and economies that reduce greenhouse gas emissions, including through the reduced use of petroleum-based chemical applications, and by enhancing soil health and its capacity to sequester and retain carbon, as well as respond to changing growing conditions and markets for different crops.
  - Prioritize and provide resources to communities with zoning that directs compact, walkable, mixed-use development; depaving; and restricted development in areas exposed to damage or that threaten the safety of people from climate hazards such as flooding, mudslides, and wildfires.
  - Reduce Vehicle Miles Traveled (VMT), invest in pedestrian infrastructure for interconnected multi-modal transportation networks and transit hubs, enforce sustainable design and materials in building and road development and redevelopment, and prioritize resources to municipalities demonstrating this goal through their zoning and capital budgets.
  - Educate, inform, and engage the public with exchange of lived experiences, data, and the status of meeting goals.
- Align state agencies and their policies that drive or dictate municipal budgets, regulations, and actions.
  - Add “teeth” to zoning mandates (not an “unfunded mandate”); state or regional regulatory zone—ex. Coastal special resource area...or a statewide climate hazard overlay zone; ecological restoration set-asides on major developments and redevelopment, pesticide and fertilizer application rules, back beach dune and restoration buffer requirements.
  - Need “carrots”— transit oriented developments (TODs) could potentially fit here for industries and municipalities. Establish implementation programs with funding opportunities to support TODs.
  - Provide actionable data and tools to municipalities so they can assess their vulnerabilities, protect and strengthen their communities, and advance statewide adaptation by enhancing the systems on which we all depend.
  - Need disincentives (“sticks”) for industries and municipalities.

**G. Goal #9: Prevent the Concentration of Adverse Environmental impacts in Overburdened Communities**

- The goal should be re-written to address the need to advance equity not only in Overburdened Communities (OBCs) but for historically marginalized populations wherever they may reside.
  - Re-written Goal 9: Advance equity in Overburdened Communities (OBCs) and for historically marginalized populations.
- We understand that State Plan goals are not enforceable as they lack statutory and regulatory authority, but we recommend that the goal language calls for implementing actions to provide for enforcement to ensure that the goal operationalizes equity.
- There needs to be specific language to include input from impacted people.
  - Outreach must engage with Black, Indigenous, and Persons of Color (BIPOC) populations and overburdened communities.
- The Justice40 framework and language needs to be applied to this goal.
- Intersectional equity must be emphasized.
  - The goal strategy should include a definition of intersectional equity and how it will be applied to the state plan.
  - Intersectional equity is the best lens to target solutions for OBCs.
- The goal strategy needs to emphasize co-created climate solutions.
  - Specific language should be used to ensure solutions are co-created with the communities most impacted, including but not limited to BIPOC and indigenous communities.
  - This will bring more ideas and necessary voices to the table.
- Climate solutions in OBCs must build trust.
- Trade occupations and unions have not been diversified.
  - The plan must address the lack of diversity in trade occupations because it is an economic equity issue.

New Jersey Future commends OPA for beginning the state plan update process. We appreciate this opportunity to provide comments on the plan's goals and strategies. Thank you for your consideration. Please don't hesitate to reach out to Chris Sturm, New Jersey Future's Land Use Policy Director, at [csturm@njfuture.org](mailto:csturm@njfuture.org) with any questions.