

November 11, 2008

Mr. Edward McKenna, Chairman, State Planning Commission
c/o Office of State Planning, Department of Community Affairs
Post Office Box 204
Trenton, NJ 08625-0204

Dear Chairman McKenna:

The State Planning Act: As you consider revising the current State Development and Redevelopment Plan I respectfully urge you to review the Legislative findings and declarations of the 1986 State Planning Act (53:18A-196). There are many ideas stated there that should have shaped the first two versions of the State Plan, yet did not.

For the purposes of this letter, I ask you to consider one “declaration,” in particular, that has been overlooked:

*An increasing **concentration of the poor and minorities** in older urban areas jeopardizes the future well-being of this state, and a sound and comprehensive planning process will facilitate **the provision of equal social and economic opportunity** so that all of New Jersey’s citizens can benefit from growth, development and redevelopment.*

A 9th Goal: PlanSmart NJ advocates that this declaration should be addressed by adding a ninth goal to the next State Plan – ***To promote racial and economic integration and provide social and economic opportunity for all.***

I raised this point for the first time in 1996, at one of the first meetings of the Commission that I attended as a member. I acknowledge now that it was a heavy lift then to change the Plan, when state planning in general and the first Plan in particular had been under attack from all sides for four years.

Today, however, the time has come to embrace this declaration as a central goal to guide the development of the third Plan, its map, key strategies and all its policies. The following are three reasons to do so:

1. The 9th Goal would help reduce the State’s Fiscal Crisis:

Even if we have been willing to tolerate the social cost to individuals, families, neighborhoods and municipalities in the past, it is no longer fiscally feasible to continue to do so. The cost of concentrated

poverty, like the cost of sprawl, has been well documented (see, for example, studies from the Brookings Institution).

The current and severe downturn in the economy signals the need to embrace the goal of increasing racial and economic integration for fiscal reasons: the fragile economic revitalization of urban areas struggles against the indicators of concentrated poverty – high rates of crime, health problems and failing schools – each one absorbing a spiraling amount of the State budget. The time to change the trajectory of these budget items is now, through the adoption of the ninth goal and aggressively striving to implement it.

2. The 9th Goal would support policies: The current State Plan has a number of statements and policies that are related to such a ninth goal, but they are weaker and fragmented without a supporting goal. One policy in particular would be strengthened by an explicit goal: the “Equity” Policy in the Statewide Policies. The Equity Policy is often narrowly and mistakenly viewed as being a policy to protect farmers and other owners of large tracts of land.

Contrary to that view is the fact that the Equity Policy was written carefully to reflect a broader purpose, something that has since been codified as a core principle of Smart Growth, “to ensure that the benefits and burdens flowing from the implementation of the State Plan are borne on an equitable basis.” (2001 SDRP, p. 110).

Reading further, the current State Plan acknowledges that “Urban Center residents, for example, feel that their equity has been eroded through urban disinvestment and resource allocation policies favoring new development in suburban and rural areas.” This section has often been overlooked and would benefit greatly from a direct goal statement.

3. The 9th Goal would support the Key Strategy: The current plan has one key strategy – center-based development. While it was PlanSmart NJ that, in 1987, provided the drafters of the first State Plan with the framework for centers, drawn from the work we did for our Regional Forum, it is PlanSmart NJ that has spent the last few years trying to understand why government have failed to implement this strategy.

One of the reasons for failure to deliver centers is that the Plan ***does not specify any jobs and housing growth*** targets by locations that centers need to absorb, ***nor does it specify exactly what functions these centers should serve***. PlanSmart NJ does not support growth for growth sake. We support growth that makes conditions better on the ground. That is what makes Smart Growth smart!

At the Plan Development Committee meetings I have been advocating that that the next State Plan should support the key strategy of promoting center-based development by setting growth targets by location, which will improve three specific conditions:

1. To ***reduce the concentration of poverty***.
2. To increase transit opportunities.
3. To prioritize water resource/habitat protection and restoration.

It is our view that the reduction in the concentration of poverty is significant among this list because it relates to the jobs and housing targets (access, affordability and location) and to the transit, or mode shift, targets (improving accessibility to jobs), both of which we advocate being added to the third State Plan. All of our recommendations – adding a 9th goal, included – are designed to make the State Plan more operational and to provide clear guidance as to how to evaluate progress toward implementation.

Please accept our thanks for your consideration of our request. I look forward to hearing your comments, and offer PlanSmart NJ's assistance as the Plan moves forward.

Yours sincerely,

Dianne R. Brake
President

COPY: Assembly Speaker Joe Roberts
Mr. Benjamin Spinelli, Executive Director, Office of Smart Growth
Mr. Adam Zellner, Policy Director, Governor's Office
Dr. Martin Bierbaum, Executive Director, MLUC
Ms. Barbara Heisler-Williams, OPEN Society
Members of the Board of the New Jersey Regional Coalition
Mr. Peter O'Connor, Fair Share Housing Center
Ms. Diane Sterner and Ms. Sally Dudley, Coalition for Affordable
Housing and the Environment