

TO: Members of the State Planning Commission
FROM: Dianne Brake, President
DATE: November 21, 2008
RE: COAH/State Planning Commission MOU

Thank you for this opportunity to comment and congratulations on working hard to coordinate the work of these two important agencies. As one of the few in New Jersey who has served on both, I know how difficult the work of each agency is and how challenging it is to coordinate it.

My comments today are brief and centered on the land use planning side of both your efforts, best organized under COAH's version of the MOU, under section C. Coordinated Planning Process.

Although I generally agree with how COAH proposes to handle questions of land use, primarily which locations would be considered acceptable under the State Plan, the language is too vague. For example, what is the definition of an Employment Center? Most sentences are qualified with the word "preferably," which is far too loose for anything that aims at a coordinated planning process.

On the other hand, the State Plan Commission's language sticks too closely to PA 1 and 2 and Centers as the only areas in which inclusionary development would be considered consistent with the State Plan. The Plan is too poorly developed at this point to limit affordable housing in this way.

I challenge the SPC, however, to make the State Plan and its State Plan Policy Map step up to the challenge of meeting both COAH's mandate and the Commission's own goal of providing adequate housing and locating it in a way that makes sense. Develop a State Plan Policy Map that shows:

- existing infrastructure (wastewater, water supply and transportation systems)
- the capacities of these systems
- the base-condition Transit Score
- existing areas of concentrated employment
- existing areas of concentrated poverty
- existing areas of multi-family housing or other indicators of diversity of housing stock.
- plus, the Jobs-to-Housing ratios in the areas of concentrated employment should be calculated and areas deficient in housing within a reasonable commutershed should be highlighted.

This would provide both a new basis for re-thinking the Planning Areas and a way to justify inclusionary zoning that may currently fall outside of PA 1 and 2 and centers.