

**Testimony to the State Planning Commission  
Lucy Vandenberg, Executive Director  
PlanSmart NJ  
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Good morning. Thank you for the opportunity to present comments on the draft State Strategic Job Growth Plan for New Jersey. I am Lucy Vandenberg, the Executive Director of PlanSmart NJ. PlanSmart NJ is a 40-year old statewide independent, non-profit planning and research organization committed to improving the quality of community life through the advancement of sound land use planning and regional cooperation.

PlanSmart NJ has long been an advocate for an effective State Plan. We have been a leader in advancing new policy frameworks to strengthen state and regional planning and implementation here in New Jersey. We have also been a leader in calling for more attention to be paid to the condition of New Jersey's economy, and brought attention to these issues long before the recession hit. Earlier this year, we hosted a conference of business leaders to discuss how stronger transportation infrastructure, more housing near jobs, and 24/7 livable communities can all contribute to a strong and healthy economy.

For all these reasons, we were pleased to see the State release a new State Strategic Plan last month. We join the chorus of voices who have called for better implementation of the State Plan. We agree that implementation of the 2001 State Plan never truly materialized, that State agencies weren't called upon to conform their regulations and policies to the State Plan, and that municipalities didn't have a clear path or solid incentives to justify their participation.

This new State Strategic Plan is a tremendous leap forward in many ways. It is a clear document that can be implemented. It focuses more on leadership and vision than on management. It recognizes the key role that our economy has to play in planning. It introduces the concept of "industry clusters" for New Jersey, which PlanSmart NJ long advocated and which has served as a national model elsewhere. It creates a Steering Committee at the highest level of state government to ensure State agency coordination. It requires the development of State Agency functional plans, a key provision that PlanSmart NJ has long promoted. It calls for a long-term funding source for open space preservation.

We thank you for your leadership in these areas and for your thoughtful inclusion of these key principles.

Of course, we have some suggestions to further develop the Plan as you move forward.

- The draft State Strategic Plan proposes to leave New Jersey's locally driven zoning and planning process as is, instead using an incentive-based point system to spur State Plan participation. Implementing the State Strategic Plan could prove to be a challenge, however, when state-identified projects of regional economic significance face local opposition. This is particularly true if the projects seek to provide both housing and jobs within a compact development blueprint, as many municipalities are averse to zoning for housing, particularly multi-family housing.

The same could be said of attempts to alter low-density sprawl patterns of housing development, which are generally the result of municipally-driven planning and zoning decisions. We suggest that you consider a pilot program that allows for a regional project level review for one of the geographic areas you select. We also suggest that you look at ways to modernize the MLUL and the County Planning Act to reflect the ideas you have contained in the new State Plan.

- New Jersey's counties and regional planning entities should play a broader role in implementing the State Strategic Plan. It would make sense to give them both more planning authority and capacity-building support so that they can effectively foster sustainable regional economic development and facilitate mixed-use compact communities in their regions. Some counties and regions are already well-positioned to provide this expertise. In others, the State will need to build that capacity to see regional planning efforts succeed there.
- The Plan proposes a criteria-based system to identify where growth should occur and where conservation should take place. This criteria-based system is intended to replace the State Plan Policy Map. This set of criteria should be further developed so that there is a transparent and predictable system for identifying where growth should be fostered and where environmental protection should be sought.
- The State Strategic Plan Steering Committee is a much-needed vehicle to spur interagency coordination, communication and dispute resolution. The Steering Committee should also play a broader role in ensuring that state agency policies, regulations and investments align before they are adopted. They should not just address emergencies and conflicts after the fact. In this way, state department actions will be coordinated under the common framework of the State Strategic Plan, rather than working at cross-purposes.
- The State Strategic Plan appropriately identifies institutional change as a guiding principle for state decision-making. The Executive Order creating the State Strategic Plan Steering Committee is a good start. Amendments to the State Planning Act, the County Planning Act, and the Municipal Land Use Law are also needed to make these changes stick.
- Lastly, PlanSmart NJ generally endorses the positions put forth by the Common Ground coalition. These recommendations are attached, and include:
  - Incorporate locational criteria to determine where growth should occur
  - Develop planning and design standards to influence how growth should occur
  - Require adherence to the Garden State Values
  - Strengthen goals for protecting natural resources and public health
  - Follow the State Planning Act
  - Set a positive and inclusive tone

PlanSmart NJ thanks you for the opportunity to comment and we look forward to working with you to further develop and implement the State Plan.

## **Common Ground State Plan Group Recommendations Regarding the State Strategic Plan**

### **1. Incorporate locational criteria to determine where growth should occur**

For the State Strategic Plan to replace the State Development and Redevelopment Plan it must have specific and objective locational criteria that enable the public and government agencies to know where the state will support growth and where it won't. At a minimum, locational criteria will need to be developed and incorporated into the plan that identifies priority growth areas, limited growth areas and priority preservation areas (agricultural and open space). *(See #B4 on attached "Comparison" document)*

### **2. Develop planning and design standards to influence how growth should occur**

The existing State Development and Redevelopment Plan does a good job of describing the patterns and forms that development should take in various parts of New Jersey. The State Strategic Plan should emphasize the importance of scale and good community design, beyond the discussion in the Garden State Values. The plan should be amended to address this issue. *(See #A2 on "Comparison" document.)*

### **3. Require adherence to the Garden State Values**

Economic, environmental, social justice and quality of life values must be met simultaneously in agency strategic plans, not one at the expense of the other. Agency strategic plans should be required to be consistent with the Garden State Values. The Garden State Values should be incorporated into the "Guiding Principles for State Decision Making" in the State Strategic Plan. Other state implementation measures, such as the municipal and project score cards and state agency capital plans, must also explicitly conform to the Values. *(See #A3 on attached "Comparison" document)*

### **4. Strengthen goals for protecting natural resources and public health**

The first requirement in the State Planning Act for the State Development and Redevelopment Plan is to "protect the natural resources and qualities of the state . . ." The State Strategic Plan emphasizes land preservation. It does not adequately address the need to protect water, air, wildlife and other natural resources wherever they are located. It does not adequately address environmental quality issues nor the cumulative impact of pollution felt by already overburdened cities cited in the plan for more development and industrialization. The State Strategic Plan should reflect these goals, through revisions to Goal 3 and better integration of the Garden State Values. *(See #A1 on attached "Comparison" document.)*

### **5. Follow the State Planning Act in both substance and process**

The State Strategic Plan, as the new State Development and Redevelopment Plan, draws its legitimacy from the State Planning Act. The State Strategic Plan and its various implementation components must be consistent with the State Planning Act in spirit, intent, and letter of the law with regards to substance and process. There are inconsistencies between the State Strategic Plan and the State Planning Act that could be problematic. *(See attached.)* The State Planning Commission must maintain its statutory role to ensure transparency and accountability to the State Planning Act. It must have a full contingent of appropriate members qualified to support the goals of the Act, prior to adoption of the Strategic Plan. *(A5)*

### **6. Set a positive and inclusive tone**

The State Strategic Plan should be a document that can stand up over time and be used by many different stakeholders as a rallying point. To this end, the language and tone of the plan must be positive. The plan should be re-edited to remove negative or inflammatory language.