



Bob Brewer, Director of Planning
Cumberland County Planning and Development
790 E. Commerce Street
Bridgeton, NJ 08302

Peter Simone, FASLA
Simone Collins Landscape Architecture
511 Old Lancaster Road
Berwyn, PA 19312

February 10, 2011

Dear Bob, Peter & Staff,

The South Jersey Bayshore Coalition thanks you for the opportunity to review and comment on the Cumberland County Open Space & Recreation Master Plan (OSRMP). The Plan is a good amalgamation of recommendations, survey results and information. However, the critical reasoning for preserving open space in Cumberland County is lacking in the document.

We would like to see the Green Acres Statewide Comprehensive Outdoor Recreation Plan (SCORP) Guidelines adhered to in the document and language inserted that accentuates the importance of Cumberland's open space for forest habitat, biodiversity, wildlife, water quality, recreation and ecotourism dollars. Studies should be referenced which show the economic benefits of open space. The 2006 USFWS studies can be found at:
<http://wsfrprograms.fws.gov/Subpages/NationalSurvey/reports2006.html>

As part of the County Master Plan, the OSRMP should reflect and honor voter and resident survey sentiments regarding the need for more open space and their willingness to pay for it. Current and future goals for county implementation of the OSRMP should clearly state that the County is interested in preserving farm, recreation and open space lands as the County is mandated to protect these lands by the Open Space Tax purposes. Adherence to Green Acres Planning Incentive Guidelines will profit the county in the future, and create a balanced land preservation program. The OSRMP will be a critical guidance document for future county planning and coordination with the state Green Acres Program and non-profits.

As indicated in the Green Acres Mission Statement and Program language:

"Green Acres Mission Statement

To achieve, in partnership with others, a system of interconnected open spaces whose protection will preserve and enhance New Jersey's natural environment and its historic, scenic, and recreational resources for public use and enjoyment.

An OSRP articulates a local government's vision of open space and recreation. It should establish a philosophical and practical justification for the protection and preservation of open space and recreation opportunities. The purpose of an OSRP is to provide a framework for implementation. Through an OSRP, you identify and examine open space and recreation resources important to you and lay out ways to protect and enjoy them.

Why is it important to plan for open space and recreation? Without planning, the appearance of a community, the quality of life enjoyed by residents, and the community's natural resources can all be dramatically altered in a short period of time due to random changes in land use. We all know of areas that have been suburbanized and the associated impacts these areas have experienced. No one wants to live in a community that does not have parks or recreation areas. Yet, in order to provide these for residents, a local government must plan for them. Open space and recreation should be considered

as part of the public infrastructure, just like roads, schools and utilities. No community would build a road without establishing the need for it and planning where it should go. The same is true for open space and recreation.”

(GREEN ACRES PROGRAM New Jersey Department of Environmental Protection

OPEN SPACE AND RECREATION PLAN GUIDELINES for Participation in the Green Acres Planning Incentive Program)

Perhaps most importantly, the Cumberland County OSRMP should clarify the acreage of open space data to reflect SCORP Guidelines. Wildlife Management Areas (WMAs) are not “parks” and are not recognized by Green Acres as Open Space in their calculations for the percentage of open space needed in each county. The WMA acreage should not be used in calculating the open space needs of Cumberland County.

We would like to recommend the language changes below based upon the long-term requirements of an Open Space Plan and to clarify Cumberland County’s vision for the future:

(Suggested language is underlined)

Please don’t hesitate to contact Jody Carrara if you have any questions about the SJBC Recommendations.

Sincerely,

Sandy Batty, Executive Director

Association of New Jersey Environmental Commissions

1. Executive Summary

Page 1, 6th Bullet

Investigated the current financial implications of this initiative

Linkages-Summary

Page 2, 3rd Bullet

*On-Road trails and Off-Road trails – complete a comprehensive master plan for a system of on-road bicycle trails and additional off-road trails throughout the county. Engage NJDOT at the outset of this process to coordinate and possibly help fund this process. Engage the National Park Service, NJ Fish & Wildlife, NGOs and local municipal partners in this process.

Land Acquisition-Summary

Page 3,

*All decisions about land preservation for parks, open space and natural areas should prioritize and recognize municipal Open Space Plans & Goals. As acquisition of open space is based upon private property rights, every effort should be made to accommodate the landowner, while also apprising the municipality of [open space purchase](#).

*Acquisition of new lands for parks, open space and natural areas is an important part of the OSRMP and should be supported by the County in conjunction with the Farm Land Preservation Program. The County should act as a source and conduit for funding to municipalities and NGO’s for open space acquisition.

(Third Bullet as written minus the last sentence)

Funding- Summary

Page 3, 1st Bullet

*Do not include planning as a use for County Open Space Tax/Include a cap of 20% for activities other than acquisition. [Administration of the fund should be derived from the 20% cap or the General Administrative Fund.](#)

Data Collection

Natural Characteristics

Page 7

Expand this paragraph to include the [forest complexes](#), biodiversity, Natural Heritage Priority Sites, RAMSAR Convention site, migratory flyway and shorebird beaches. (This is part of the rationale for preserving open space.)

The language inserted can be found in the NJF&W Wildlife Action Plan, excerpts from pages 181-181, available on the web: <http://www.njfishandwildlife.com/ensp/waphome.htm>:

"This region has the highest concentration of rare and endangered wildlife in New Jersey, accompanied by the lowest density of urban development in the state. The Delaware Bay Landscape is a region of global importance and offers considerable opportunities for conservation."

"The Delaware Bay Landscape is essential for the viability of national and international bird migrations as well as rare New Jersey wildlife. This region includes the Delaware Bay coast and marshes, critical stopover habitat for Western Hemispheric migratory shorebirds, including red knots, which depend on this coastline and an abundant food supply. This region also includes the Cape May Peninsula, nationally recognized for its high-density migration of passerines, American woodcock, and raptors that are funneled along the Atlantic and Delaware Bay coasts."

The Delaware Bay region supports the largest portion of the state's bald eagle population, and has been essential to the recovery of the eagle in the state. The Delaware Bay region is a critical migration and wintering area for American black ducks in the Atlantic Flyway. The marshes of the large rivers of this region support one of the largest fall concentrations of sora in the Atlantic Flyway. The region is crucial to the state's population of eastern tiger salamander, Cope's gray treefrog, northern harrier and black rail. **In addition, the region holds some of the state's largest contiguous forest blocks, which support species that depend on unbroken forest habitats – some of the most rare and sensitive species in the state.** Delaware Bay beaches, wetlands, forests, and grasslands support an abundance of rare and migratory wildlife. Included are federally-listed aquatic species (sea turtles and shortnose sturgeon) marginally supported in this region. There are 13 state endangered, 14 state threatened, and 128 special concern and regional priority wildlife species. The bald eagle, black skimmer, Henslow's sparrow, least tern, northern harrier, peregrine falcon, red-shouldered hawk, short-eared owl, sedge wren, vesper sparrow, corn snake, Cope's treefrog, eastern tiger salamander are the state endangered within the Delaware Bay Landscape. State threatened wildlife include the barred owl, black rail, black-crowned night-heron, bobolink, Cooper's hawk, grasshopper sparrow, long-ear owl, osprey, red knot, red-headed woodpecker, savannah sparrow, northern pine snake, Pine Barrens treefrog, and frosted elfin. Special concern wildlife include cavity-nesters, coastal marsh birds, colonial waterbirds, forest passerines, grassland birds, and scrub-shrub/open field birds; northern diamondback terrapins, carpenter frogs, and other reptiles and amphibians. In addition, summer populations of forest-dwelling bat species, potentially including the federal endangered Indiana bat, occur in the Delaware Bay."

Page 14

Page 14

Include an internet link to the NJDEP Landscape Project & Mapping

Page 15

Include language about the Pinelands Comprehensive Management Plan which mandates Cluster Ordinances and density bonuses which allow for significantly more development.

Page 16

Both Cohansey and Maurice Rivers and the Delaware Bay serve as part of the Atlantic Flyway for migratory birds.

Page 17

Cape May County, New Jersey

....45% of the County's land area is preserved, wetlands or open water. CAFRA regulations have been avoided by building developments of 24 units or less.

Page 19

Salem County Open Space Plan

The language in their plan reflects their vision for the future. Language such as this should be inserted in the Cumberland County OSRMP recommendations to support the rationale of protecting open space.

2. Analysis

Page 32

Open Space Need Chart.

Remove the NJDEP Lands as Open Space. This 42,994 acreage is not supposed to be in the SCORP calculation as the land is appropriate for hunting & fishing only. (Joe Smith & his family will not be hiking in these woods)

Provide an asterisk at the bottom of the table explaining why the acreage is not included.

Page 33

- Remove the paragraph about 37% open space being sufficient. The OSRMP is supposed to give rationale for preserving open space, not reasons for NOT preserving open space. **This document should reflect the recreational open space needs of the county and resident sentiments which were clearly expressed in the survey. The County's current fiscal state should not be guiding the language in the OSRMP as the document will be a part of the overall vision as part of the Master Plan. The fiscal state of the county will change over time and change significantly when voters choose an increase in Open Space Tax.**

Page 35

Map 5

*...CAFRA law regulates all land development within 150 feet of the Mean High Water (MHW) line. Beyond the 150 feet from MHW, CAFRA regulates residential developments of 25 units or more and commercial development of 50 or more parking spaces.

Page 36

Map 6 Areas of Interest for Preservation

Add language for each Tier which indicates the species, habitat, wetlands, streams and biodiversity found in these Tiers. (Information can be found in Landscape Project Data). This data is also the rationale for preserving open space.

3. Recommendations

Land Acquisition

Page 43 & 44

Change language to conform to Green Acres SCORP Guidelines. Cumberland County does not have 37% Open Space. Municipal residents voted unanimously for an Open Space Tax believing funds would be spent on both Farmland and Open Space, thus the county is mandated to preserve both. While apprising a municipality of potential open space acquisitions, again, we emphasize that the plan is a guide for the future and should NOT discourage private property owners from selling their land.

Land Acquisition – Summary recommendations

Page 48

*All decisions about land preservation for parks, open space and natural areas should **prioritize and recognize municipal Open Space Plans & Goals.** As acquisition of open space is based upon private property rights, every effort should be made to accommodate the landowner, while also apprising the municipality of open space purchase.

*Acquisition of new lands for parks, open space and natural areas **is an important part of the OSRP and should be supported by the County in conjunction with the Farm Land Preservation Program.** The County should act as a source and conduit for funding to municipalities and NGO's for open space acquisition.

(Third Bullet as written minus the last sentence)

An additional observation about relating to the general public regarding preservation, the public feels a strong attachment to the benefits of open space – clean water, drinking water, clean air, fresh vegetables, farms and recreational opportunities. And they do not as readily connect to words like watershed, water recharge, and open space. In as much as the summary document is to be used by the general public we should explore if the friendlier words are abundant enough. We not suggesting eliminating proper language but suggesting we have enough of the words that people connect with, since we want them to embrace the final document.

Local Municipal Open Space Tax

Page 51

Upper Deerfield sets aside \$50,000 each year for open space purchase.

Use of Funds for Park, Open Space and Natural Area Initiatives

Page 58

Remove Planning from the list of activities the Open Space Tax may be used for and place a cap of 20% on usage other than acquisition

Criteria for County Funding Applications

Page 60

Bullet 4 Open Space saves municipalities money. This is well documented

http://www.cfr.washington.edu/research.envmind/Policy/EDRA_Value.pdf

<http://www.skyclean.org/archive/rtables.html>

Funding – Summary Recommendations

Page 61

Remove Planning from list of activities to be supported by an OS Tax and place a 20% cap on activities other than acquisition

Add language to the final chapter of the OSRMP that is supportive of Open Space protection while recognizing current fiscal restraints. Reference could be made to the funding that other counties receive from the Green Acres Program.

Funding for other counties

2008 – 2012

New Jersey

Statewide Comprehensive Outdoor Recreation

Plan

Table 11

Green Acres County Planning Incentive Funding

1999-2006

County Funding Awarded

Atlantic \$ 8,000,000

Bergen \$ 5,650,000

Burlington \$ 8,750,000

Camden \$ 6,750,000

Gloucester \$ 4,550,000

Hudson \$ 2,385,000

Hunterdon \$ 7,523,350

Mercer \$ 7,000,000

Middlesex \$ 9,750,000

Monmouth \$ 12,045,000

Morris \$ 7,225,706

Ocean \$ 5,250,000

Passaic \$ 5,000,000

Somerset \$ 13,250,000

Sussex \$ 1,250,000

Union \$ 6,750,000

Warren \$ 3,250,000

Total \$114,379,056