



April 2, 2012

Dear Members of the NJ State Planning Commission:

The South Jersey Bayshore Coalition (SJBC) appreciates the opportunity to comment on the draft State Strategic Plan, especially with regard to its impact on the southwestern portion of the state. SJBC comprises non-profit organizations working together to preserve the environmental and cultural heritage unique to the Delaware Bayshore Region.

It is essential that the State Plan provide a predictable, unifying and common vision, policy and implementation strategy across the geography of the state and between levels of government, as well as between the public and private sectors, across a range of issues important to us as a state.

This draft State Plan is not a Plan. It lacks most of the critical components necessary to plan for continued growth in New Jersey. While it may fuel growth in new places, the majority of this growth will result in negative impacts that will diminish New Jersey's economic viability and cost New Jersey's taxpayers millions.

This plan wipes out nearly 30 years of planning progress under six elected governors' administrations although the 2002 plan was not perfect, this does not warrant throwing it out entirely. The 2002 plan represents years of consensus building with local stakeholders and countless other organizations.

While this vision document lays out some respectable principles and objectives, it fails to address the real issues that have allowed the continuation of unabated sprawl, traffic gridlock, loss of vital natural resources and productive farmland, and an inability to adequately reinvigorate our urban centers.

The Plan fails to identify obvious and long-accepted tools needed anticipate, evaluate and make decisions around critical issues with some level of confidence in the outcome – and sets the stage for more chaos, more lawsuits, more inefficiency and waste at all levels. This absence of any land use controls will only facilitate more costly sprawl development, which before the recession was eating up over 16,000 acres of precious remaining working farmland and forests per year.

We urge the SPC to restore the Policy maps. The 2007 draft policy maps and proposed planning areas more accurately represented environmental constraints, and provided greater transparency and predictability to local planners and the regulated community. This information helps avoid future conflicts. We need a map that everybody can follow that shows where it makes sense to grow and where it doesn't. For all their imperfections, the existing plan and map did this, and now we have nothing but a vision statement that emphasizes development over all other critical considerations.

The prior State Plan and Map took us in this direction: It's not only critical to determining where to target limited preservation dollars, but to discouraging sewers and other growth-relating projects that undermine public investments.

The proposed "criteria based approach" does not provide predictability for local government, developers, or the public. This is only exacerbated by the repeal of the current State Plan map and the lack of analysis of the state and regions to support growth within the capacity of essential public resources as critical wildlife habitat, available water supply, roads and wastewater treatment. The Strategic Plan fails to recognize water supply as a limiting factor to growth in many areas.

In addition, it's irresponsible to refer to the Landscape Project as flawed (page 18). Landscape data are supported by verifiable sightings of rare species and science-based criteria. This kind of misleading, negative language has no place in a State Plan.

On paper, the Strategic Plan recognizes that protecting the environment is essential to protecting the economy, but in reality, it fails to provide the necessary growth management tools needed to ensure that protection. The worthy goal of targeting the state's financial support of specific priority economic sectors does not justify removing balancing policies and sound local planning.

The Plan sets no plan to limit growth in agricultural or non-growth areas – a death sentence for our farms in the "Garden State" – especially in the South Jersey region. While the State Plan includes language stressing the importance of State's preservation programs, it lacks emphasis on resource protection measures and environmental health. Open space preservation alone cannot achieve sustainability. Land acquisition is not sufficient to provide the level of protection needed. If piecemeal preservation efforts were enough, then Barnegat Bay wouldn't be degraded to a point where you can't swim in it. Failing to protect the environment exacts very real costs.

Under the Strategic Plan as written, projects like the proposed Gloucester-Salem Regional Wastewater Plan would be fast-tracked without any consideration to significantly increased demand on water resources in a region already designated for water supply deficit. Proponents of this plan want to send sewer lines to DuPont through rural Salem County to foster growth in the region. By sending all that treated wastewater out into the Bay instead having it recharge area streams and ground water, the existing water supply deficit will become a water supply crisis, as streams and wetlands, as well as residential and agricultural wells go dry.

The SSP recognizes the need to protect land and water based industries, but fails to recognize that to protect these industries, the land must also be protected. The Coast, Shore and Delaware Bayshore must be recognized as regions of special, statewide significance and in need of restoration and protection. We need environmental protection of water quality, quantity and the parts of the landscape that act as the "green infrastructure" for tourism, recreational and commercial fishing and other businesses at the foundation of the Shore economy.

The businesses and industries related to the Shore should be recognized as a priority for the state to support through protection of the environment on which they depend: no clean water, no beach season. It is the same with the regions' large, yet ever shrinking agricultural areas: no farms, no food.

Statutory directives to protect the coast and coastal resources already exist. These need to be integrated into the Strategic Plan as a priority.

New Jersey needs a plan that discourages development that does NOT make sense; A plan that provides

for redevelopment of our existing decaying town centers. New Jersey needs a plan that promotes reuse of abundant vacant warehouse and industrial spaces. New Jersey needs a plan that protects investments already made.

With the right leadership, it's not too late to amend this plan to ensure consistency with the State Planning Act and provide a clear road map to economic and environmental sustainability.

Sincerely,

Cheryl Reardon
South Jersey Bayshore Coalition

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