



NEW JERSEY HIGHLANDS COALITION

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New Jersey State Planning Commission
Trenton, New Jersey
electronically filed to: osg_ed@sos.state.nj.us

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Re: Comments on the proposed Map Amendments concerning 413 acres in Mt. Olive Township, Morris County

In the final draft State Strategic Plan the preservation of New Jersey's critical resources is not only equal in priority to promoting economic growth, the Plan recognizes that protecting our natural resources is an essential element of a vibrant economy and as such, designates the protection of natural resources as one of the four main investment goals of the State Plan.

If the State Planning Commission seeks to faithfully adhere to its own stated goals, if it is to implement the State Strategic Plan honestly and with credibility, the Commission cannot ignore the presence of verified critical natural resources when contemplating planning area policy changes, or apply policies that would place our critical resources at risk.

The 413 acre site in Mt. Olive includes portions that are developed, disturbed, or have limited resource value. The site also contains verified and inventoried critical natural and cultural resources that are diminished or ignored in the justification given for downgrading the resource value of the site.

How does the State Planning Commission account for this omission? Can the Commission designate planning policies suitable for low resource value sites when high value resources are present? Does the Commission have a formula for determining when resources are sacrificed and when they should be preserved?

The justification for the proposed map amendment omits any discussion of the 65 acres of undisturbed upland forest surrounded by a forested area of Allamuchy State Park. There are no references to the wellheads, the prime groundwater recharge areas, the presence of wood turtles, or the extant features of the State and federally listed Morris Canal. All of these are known critical resources and inventoried by the Department of Environmental Protection, the Highlands Council, and included in the 2007 Mt. Olive Township Natural Resources Inventory. In fact the Mt. Olive NRI categorizes parts of the site as having the highest level of environmental resource value in the township.

Good planning takes on the difficult and important challenge of balancing economic growth with natural resource protection. The proposed map adjustment not only fails to attempt this balance, it clearly places critical resources at risk. We are told this is a staff initiated change and references an agreement between OSG and Morris County in a cross acceptance discussion from 2007. An agreement was reached contingent on delivery of an NJDEP shape file showing the PA-2 boundary and the designation

of a critical environmental site (CES). In the currently proposed PA-2 boundary no reference is made to the NJDEP shape file or the CES designation. There is no evidence that there is any resemblance to what was agreed in 2007. It is unclear who is benefitting from this amendment, as the staff must have better things to do than propose map amendments that appear to have no outcome other than deprive us of our critical resources.

The new State Strategic Plan, with little resemblance to the impenetrable policy encyclopedia of past plans, offers a simple clear statement of estimable goals, promises high standards, common sense and transparency. The new Plan, under the guidance of the State Planning Commission, will direct a strategic alignment of State agency resources so that good planning outcomes are encouraged. Protecting the natural resources of the State, as the State Strategic Plan clearly recognizes, is essential to our economic health.

The State Planning Commission is provided with no regulatory authority. It doesn't approve or deny development proposals. The municipality is free to be guided or not by the Commission's recommendations. The role of the Commission is to encourage. So it becomes very difficult to understand why the Commission doesn't encourage the very best planning. And when it doesn't, what's the point?

You cannot encourage good planning and you cannot maintain a vibrant economy if you fail to protect our critical resources. It is an often repeated refrain in the State Strategic Plan. But the very first step is to stop ignoring them. Maintaining the PA-5 designation for the portions of the site that are environmentally sensitive and culturally significant is a step in that direction.

Sincerely,



Elliott Ruga
Senior Policy Analyst

cc: State Planning Commissioners (by email)
Dan Kennedy, Deputy Director, Office of Planning Advocacy (by email)
Julia Somers, Executive Director, NJ Highlands Coalition (by email)