

**Cross-Acceptance Report
Preliminary New Jersey State Development
and
Redevelopment Plan**



**Delaware Valley Regional Planning Commission
October 2004**

Cross-Acceptance Report Delaware Valley Regional Planning Commission

I. Background and Purpose

The State of New Jersey, through the Office of Smart Growth (OSG), within the Department of Community Affairs (DCA), and the State Planning Commission (SPC), has initiated a cross-acceptance process that is scheduled to result in the re-adoption of the New Jersey State Development and Redevelopment Plan in July 2005. The current State Plan was adopted in March 2001, following an extensive cross-acceptance process involving the counties, municipalities and regional entities. The State Plan is required to be reviewed every three years.

The Delaware Valley Regional Planning Commission (DVRPC) is the designated Metropolitan Planning Organization for the nine-county, bi-state Philadelphia-Camden-Trenton region. In accordance with the February 2004 Cross-Acceptance Manual, DVRPC is a designated "regional entity" charged with reviewing the Preliminary New Jersey State Development and Redevelopment Plan (April 2004) and comparing it with the agency's "plans, policies and regulations" to determine consistencies and inconsistencies. This report reflects the outcome of the review process and includes DVRPC's findings and recommendations for consideration by the OSG, DCA and the SPC.

Memorandum of Understanding

In 1994, the DVRPC Board and the State Planning Commission executed a comprehensive Memorandum of Understanding (MOU) between DVRPC and the Office of State Planning (OSP), predecessor to the current Office of Smart Growth. The 1994 MOU updated and expanded a 1993 MOU on Data Exchange and established a framework for continuing cooperation, coordination and involvement in mutual planning-related projects, studies and programs, as well as establishing non-voting membership status for the State Planning Commission on the DVRPC Board and various DVRPC committees. Since that time OSP/OSG staff have participated in both policy-level and technical meetings at DVRPC and DVRPC staff have participated in similar activities and meetings related to the State Plan and population and employment forecasting. The 1994 MOU remains in force a decade later.

DVRPC's 1998 Cross-Acceptance Report

This is the second formal cross-acceptance report filed by DVRPC. In April 1998, DVRPC staff prepared a *Draft Cross-Acceptance Report* that compared the Preliminary State Plan proposed at that time with the adopted *Direction 2020* Plan. The Draft Report was accepted by the DVRPC Board and submitted to the Office of State Planning for review. The DVRPC report summarized DVRPC's adopted plan and describes areas of general plan consistency, several inconsistencies and recommendations. The report also noted the different geography (state v. region and county), forecasting process (statewide v. region

and county), designation of centers and planning areas, as well as the different uses for which the state and regional plans are intended.

Overall, however, the conclusion of the initial Cross-Acceptance Report was that DVRPC's regional plan (*Direction 2020*) and the State Development and Redevelopment Plan were generally consistent, and that each plan was trying to accomplish the same key purposes: promote greater community identity; contain sprawl; encourage revitalization of older, declining core areas; coordinate land use and infrastructure (sewer, water, transportation) planning; preserve open space and natural resources; and involve communities, counties and the public in the planning process to better reflect their goals and needs and to achieve buy-in on plan recommendations.

The Cross-Acceptance Process in 2004

The Preliminary State Development and Redevelopment Plan is not a complete plan document. Instead, it contains only those sections or plan elements that are proposed to be changed when the plan is re-adopted. DVRPC reviewed these proposed changes and the new material. In addition, a key component of the Preliminary Plan is the release of Preliminary Plan Maps of each county, showing revised boundaries for planning areas, natural features and related designations. These maps are the focus of extensive review and comment as part of the county and municipal government cross-acceptance processes concurrently underway across New Jersey. DVRPC also reviewed the maps for its four South Jersey counties to determine consistency with the Year 2025 Plan.

Scope of DVRPC's Cross-Acceptance Report

The cross-acceptance report that follows covers DVRPC's "plans and policies," since the agency has no regulatory power or "regulations" pertinent to the State Plan. Comments are offered on plan goals, policies, population and employment forecasts, growth areas, centers, planning area designations and maps. In addition, DVRPC staff coordinated with each of the planning agencies in the four New Jersey counties within our region (Burlington, Camden, Gloucester and Mercer) to determine the status and level of their review of the Preliminary Plan and its maps, as well as their involvement in the cross-acceptance process with their municipalities.

Context of DVRPC's Cross-Acceptance Report – Pending Year 2030 Plan

DVRPC is currently involved in the later stages of a three-year planning process, scheduled for completion in June 2005, to update and extend the adopted Year 2025 Land Use and Transportation Plan to the Year 2030. Thus, several key components of the *Destination 2030* planning process will not be completed by the Office of Smart Growth's due date for Cross-Acceptance reports (October 22, 2004). Consequently, DVRPC's report primarily focuses on a comparison with the Year 2025 Plan, while referencing various aspects of the pending Year 2030 Plan where pertinent or available. Despite this timing mismatch, it is clear that the basic planning principles that resulted in development and adoption of the Year

2025 Plan (as an update and extension of the previous Year 2020 Plan) are still appropriate for the Year 2030 Plan. While the horizon year will be extended by five years, there will be minimal differences to the basic policies and only incremental changes (primarily due to updated information) for such areas as the extent of existing developed areas; revised population and employment forecasts; modified growth area boundaries; and the status of permanently protected open space and farmland. Both plans are extensions of the Year 2020 Plan, which was the basis for DVRPC's Cross-Acceptance Report in 1998.

II. Goals, Policies and Strategies

DVRPC's adopted Year 2025 Plan includes maps of future land use and transportation facilities that are supported by a goal and policy framework. The thrust of these goals and policies is very much consistent with the goals and policies of the adopted State Development and Redevelopment Plan, as well as the changes and additions proposed in the Preliminary State Plan. Various aspects of DVRPC's policy and goal framework are summarized here.

Regional Growth Management Strategy and Vision

A central theme and goal of the adopted Year 2025 Land Use and Transportation Plan (See Figure 1) is the management of regional growth and development through the provision or use of new and existing infrastructure systems to support forecasted growth in appropriate locations. This growth management strategy is consistent with plans and policies at the State, regional, county and local government levels, and is intended to curtail sprawl; enhance and revitalize existing communities; preserve natural features, farmland and open spaces; create and maintain community character and identity; and yield more livable and sustainable communities that can be served by a multi-modal transportation system. Given the local government-dominated land use control system in both Pennsylvania and New Jersey, it is essential that a regional growth management strategy be built from the bottom up – the region's 353 townships, boroughs and cities (114 of them in the New Jersey portion of the region).

a. Plan Concepts and Policies

The Year 2025 Plan defines four geographic areas within the region to better differentiate the range of issues, growth management and infrastructure investment strategies and policy approaches needed to help achieve the region's vision. These policies and strategies for change are intended to work together to achieve mutual benefits, while "bending the trends" that have caused negative effects on the quality of life of the region's citizens.

- **Core Cities** – The four Core Cities of Philadelphia, Trenton, Camden and Chester are confronted with major challenges of blight, poverty and social problems. Also, these communities and many neighborhoods within their boundaries have experienced the loss of population and jobs and a deteriorating physical environment. The goals and policies of the Year 2025 Plan are intended to promote revitalization and renewal of these

cities, as well as rebuilding and reuse of existing infrastructure systems, while encouraging renewed population and job growth (“recentralization”) as conditions improve and stabilize.

- **First Generation Suburbs** – The region’s First Generation Suburbs were the location of the initial wave of suburban expansion prior to World War II. These urbanized townships, boroughs and cities have been suffering from a continuing loss of population and jobs, a declining tax base, aging infrastructure systems, increasing service demands and an aging population. Many of these problems, albeit on a smaller scale, mirror those faced by the region’s Core Cities. The Plan recommends various local strategies to revitalize and stabilize these communities to deter further decline (“thinking regionally, but acting locally”). In addition, the Plan encourages promotion of the attributes of these communities, with their compact, mixed use development pattern, existing transit service, pedestrian and bicycle scale, more affordable housing stock and neighborhood identity. Rebuilding New Jersey’s cities is a high priority of the State Plan, as well.
- **Growing Suburbs** – The Growing Suburbs epitomize the image that most people have of suburbia: rapid population and job growth, a sprawling land use pattern along major roads, an auto-dependent environment and growing traffic congestion. At the same time, the growth and development in the new suburbs, including shopping centers and office parks, has resulted in the creation of a multi-centered region, breaking the historic interrelationship between the Core Cities and suburbia in terms of the primary location of jobs (the Cities) and worker residences (the suburbs). Using the Centers and Growth Area concepts describe above, the Plan’s goals and policies are oriented towards managing growth and sprawl in the region’s Growing Suburbs, while also encouraging better design quality for individual developments and communities. This approach is also quite consistent with the growth management and smart growth approaches advocated in the State Plan.
- **Rural Areas** – The region’s Rural Areas are centers of world-class agricultural production and a lifestyle that is disappearing from most of the Northeast Corridor. In addition, the non-agricultural lands and defined natural features in these areas are not needed to accommodate the adopted population and employment forecasts for the Year 2025. The Plan’s policies are intended to encourage the preservation of these areas, including permanent protection for defined natural features and prime agricultural lands, while minimizing the introduction of extensive or intensive infrastructure that would support exurban growth and sprawl, and which would threaten community identity, character and lifestyle. These goals are also consistent with the environmental and rural preservation goals of the State Plan.

b. Centers – Creating, Reinforcing and Maintaining Places and Community Identity

A key approach advocated in the Year 2025 Plan's goals and policies is the concept of *Centers*. Centers are mixed use or large-scale single use development concentrations that are intended to provide a focal point in the regional landscape that can serve to reinforce or establish a sense of community for local residents, while recognizing their regional significance from a governmental, service, economic base or mixed-use perspective. The Year 2025 Plan includes a hierarchy of Center-types, based on their current or prospective role and activities within the region.

- The most intensive Centers are Center City Philadelphia, which is the region's Metropolitan Center, and Metropolitan Sub-Centers. The latter are differentiated between growing areas, like the Cherry Hill/Voorhees/Marlton area and the Route 1 Corridor, and areas in need of renewal, like the Core Cities of Camden and Trenton.
- Numerous Regional Centers are also defined in the plan, categorized by the status of current development (Revitalizing, Stable or Growing). The identification and designation of DVRPC's Plan Centers was coordinated with the respective planning agencies for consistency with county and local plans.
- Primarily for mapping clarity, local centers are not defined on DVRPC's Land Use and Transportation Plan, but are described and defined in county and municipal plans. This mapping approach for DVRPC's plan is inconsistent with the local, village and hamlet designations in the State Plan.

While not identical, DVRPC's Centers concept and its intent are very consistent with the initial State Plan's emphasis on "*Communities of Place*," as well as subsequent State Plan policies and recommendations.

c. Growth Areas – Coordinating Sewer, Water and Transportation Facility Planning

Another key strategy inherent in DVRPC's Year 2025 Plan is to identify areas outside of the defined centers that are appropriate for new growth, while simultaneously discouraging intensive infrastructure investment and growth in areas located beyond defined growth boundaries. This growth management approach was developed in collaboration with DVRPC's city and county member governments, and has been consistently applied since DVRPC's Year 2010 Plan. The strategy is derived from a framework of sewer, water and transportation facility plans that define proposed "growth areas", where infrastructure is in place or planned to support new growth. These areas are contiguous to existing developed areas and provide appropriate and sufficient land (in combination with the Centers, Core Cities and First Generation Suburbs strategies) to accommodate the region's increases in population and jobs. By focusing growth and development in already developed areas and designated growth areas, sprawl can be curtailed and the costs of infrastructure expansion can be reduced.

DVRPC's growth areas approach is consistent with the basic growth management recommendations in the State Plan.

d. Rural or Agricultural Areas and the Open Space Network

Areas located outside the region's already developed lands and the defined growth areas are composed of protected lands (parks, preserved farms or land trust lands), proposed open space network lands (proposed for protection due to their ecological and recreational attributes), or are largely undeveloped rural and agricultural lands designated to remain rural in character. To avoid growth inducement and further sprawl, these areas should not be the focus of major infrastructure systems or intensive new development. The region's protected lands and proposed open space network serve a variety of purposes, including active and passive recreation, shaping growth patterns, community and landscape aesthetics, promoting tourism and economic development and shaping community character. To avoid growth inducement and further sprawl, these areas should not be the focus of major infrastructure systems or intensive new development, and, when designated for proposed open space on county and municipal plans, should be protected from any future development.

Recommendations for showing protected lands more accurately, establishing Critical Environmental Sites in Planning Areas 1, 2 and 3, and making changes to Planning Area 1 and 2 designations are discussed in the Recommendations Section.

III. Population and Employment Forecasts

We are pleased to see that the Preliminary State Plan (based on the text and tables on pages 36 to 38) seems to accept the Metropolitan Planning Organization forecasts for the year 2025. Simultaneously with the preparation of an updated long-range plan, DVRPC prepares revised and extended population and employment forecasts at the regional, county and municipal levels. The currently adopted forecasts for the Year 2025 Plan are being revised and extended to the Year 2030. In July 2004, the DVRPC Board adopted regional and county forecasts for employment. The county and municipal population forecasts for the Year 2025 remain the same, but have been extended to the Year 2030. The municipal employment forecasts have been revised consistent with the newly adopted county control totals (see Appendix 2). Draft 2030 municipal population and employment forecasts are currently undergoing county review.

- Appendix 1 shows DVRPC's adopted 2025 county and municipal population forecasts for Burlington, Camden, Gloucester and Mercer counties. As noted above, the 2025 forecasts have not changed, but have been extended to the Year 2030.
- Appendix 2 shows DVRPC's adopted Year 2025 county and municipal employment forecasts and, for comparison, the adopted county-level employment forecasts and draft municipal employment forecasts for 2030.

- Figure 2 shows the differences between the county-level employment forecasts prepared by DVRPC for the Year 2025 and 2030 Plans. DVRPC's Year 2030 county-level forecasts for employment are generally lower than the previous forecasts for the Year 2025 Plan. For consistency, the revised DVRPC, county-level employment forecasts for 2025 (in bold on Figure 2) should replace the Preliminary State Plan's 2025 employment forecasts for the DVRPC-member counties (and reflected on the Employment Projections Table on page 38 of the Preliminary State Plan).

Figure 2
Comparison of DVRPC
2025 and 2030 Regional Plan County Employment Forecasts for 2025

County	2025 Plan	2030 Plan for 2025	Difference	%
Burlington	250,550	240,051	-10,499	- 4.2
Camden	264,160	233,122	-31,038	-11.7
Gloucester	122,650	129,168	6,518	5.3
Mercer	259,900	252,120	-7,780	- 3.0
Total	897,260	854,461	-42,799	- 4.8%

Source: DVRPC 2003 and 2004

Development of the regional and county-level forecasts involves extensive coordination and communication with DVRPC's member governments to yield county acceptance and policy agreement. Once adopted by the DVRPC Board, these numbers become the control totals for the disaggregated population and employment forecasts at the municipal level, including 114 municipalities (townships, boroughs and cities) in the New Jersey portion of the DVRPC region. The county review of DVRPC's draft municipal forecasts is another critical step in the process, often involving adjustments and compromise. Any coordination of the draft forecasts with local governments is delegated to the county planning agencies (with the exception of the four Core Cities, which are also DVRPC member governments).

Given this established, shared and continuing approach, it is DVRPC's firm position that the regional, county and municipal forecasts that result should be the forecasts accepted and incorporated in the State Development and Redevelopment Plan. It will not be helpful, for either State or regional planning efforts, if there are two sets of forecasts for DVRPC's four New Jersey member counties.

IV. DVRPC Member Governments and Cross-Acceptance

Each of DVRPC's four member New Jersey counties (and two cities) is actively participating in the Preliminary State Plan cross-acceptance process and is also coordinating with their respective municipalities. Likewise, DVRPC has communicated with each of our New Jersey member governments to determine the status of their involvement and whether any issues pertinent to DVRPC's plans and implementation programs might apply. DVRPC also reviewed the draft

State Plan maps for each county in comparison with the adopted Year 2025 Land Use and Transportation Plan map. The outcome of this coordination and review process follows. (It is recognized that the County comments that follow are preliminary. The comments are based, for the most part, on initial or incomplete meetings with all county municipalities that will be further refined during the cross-acceptance process.)

- **Burlington County**

Preliminary comments from the County's Department of Economic Development and Regional Planning, following meetings with their River Route municipalities, have revealed no major "state plan issues" (such as negotiation issues) yet. County planning staff are concerned that grouping statewide policies under goals will result in placing various issues into "silos," thereby undermining the cross-cutting intent of the State Plan. Meetings with communities with serious vision issues are underway, and county planners are compiling a projects list for the infrastructure needs assessment. The mapping, with only a few exceptions, is relatively stable, although Route 130 Corridor nodal boundaries are shifting as the light rail is attracting more higher density residential and mixed-use development rather than exclusive industrial nodes.

- **Camden County**

The 37 municipalities that make up Camden County have the highest density within the 4-county DVRPC area. A majority of the county falls within Planning Areas 1 and 2 and have sewer and water capacity. There are no issues between the DVRPC Long-Range Plan, Horizons 2025 and the NJ state map depicting planning areas for targeted new growth and targeted preservation. Camden County is primarily mature suburban communities that experienced their population and employment peaks before World War II. These communities are now distressed, experiencing the same urban, social, and physical problems as the Core City of Camden. DVRPC *Horizons 2025* has targeted these communities for revitalization and redevelopment, which is also consistent with NJ State policy on targeted and expedited development of urban areas. The County's western communities of Waterford, Chesilhurst, Berlin, and Winslow continue to grow in regional growth areas outlined by the Pinelands Commission. Some of the Potential Critical Environmental Sites shown on the NJ State Map are similar to the proposed open space network on the DVRPC Long-Range Plan and to the Proposed Greenways and Focus Areas of the Camden County Open Space and Farmland Preservation Plan, but there are significant differences between the state map and the regional and county level maps that will need to be reconciled through Camden County's Cross Acceptance process.

- **City of Camden**
 Camden City is a Core City and a Sub-Metropolitan Revitalizing Center in *Horizons 2025*, which is consistent with its designation in Planning Area 1. Since it is a designated center with an endorsed master plan, Camden has priority status to receive funding for redevelopment efforts. Recent efforts have included various neighborhoods – Cramer Hill, the waterfront, and downtown – that have taken advantage of the city’s infrastructure and transportation network to encourage rebuilding and development back into the region’s Core Cities. DVRPC’s revitalization and redevelopment policies for Core Cities like Camden are consistent with the Preliminary Plan map.

- **Gloucester County**
 The County Planning Division generally believe that the Plan Map and the Preliminary Plan policies are similar to the 2001 Plan, and they support the goals of encouraging more compact development and preserving undeveloped areas. Preliminary review comments include concerns about the mapping of “sewered areas,” which are inconsistent with other mapping sources, such as DVRPC’s Tri-County Wastewater Management Map, the Gloucester County Utilities Authority Wastewater Management Map and local Municipal Utility Authorities mapping. The county is also seeking Planning Area redesignations for the following local areas:

 - (1) In West Deptford Township, the 1,100 acre, “Riverwinds” mixed use complex is misnamed as “Park and Natural Areas.” It should be included in Planning Area 1.
 - (2) The County supports Woolwich Township’s proposal to redesignate the Route 322 Corridor from Planning Areas 3 and 4, a scattering of “Potential Critical Environmental Sites” and “Park and Natural Areas” to Planning Area 2 for the area west of the NJ Turnpike and Planning Area 3 east of the NJ Turnpike. This area would accommodate a large, mixed-use development and a settlement agreement to satisfy the township’s COAH obligations.
 - (3) Harrison Township has requested that the Route 322 Corridor Area adjacent to Woolwich be changed from Planning Area 4 to Planning Area 3 to reflect the changing character from agriculture to more developed uses.

- **Mercer County**
 Mercer County, through the Division of Planning, has been working closely with local municipalities and the Office of Smart Growth to carry out a coordination and outreach program on the Cross-Acceptance process with the county’s municipalities. Two surveys have been sent to the county’s municipalities seeking responses to issues and proposed changes in the Preliminary State Plan. County Division of Planning staff has also reviewed the Preliminary State Plan and maps in terms of consistency

with the county's adopted master plan. According to Planning Division staff, the following local, county and regional cross-acceptance issues have been identified:

- (1) Hopewell Township and Pennington Borough are concerned about future growth implied by the Planning Area designation for their communities, since it is inconsistent with local growth policies and seems to be based on an erroneous sewer service area map prepared by the Department of Environmental Protection.
- (2) Some communities have expressed concern about the mapping criteria for the different Planning Areas, since different areas have the same persons per square mile density at present.
- (3) The County and municipalities are concerned that Preserved Farmland does not appear on the Preliminary State Plan maps.
- (4) Mercer County will be working with their municipalities to develop municipal population and employment forecasts, using the draft DVRPC municipal forecasts as a starting point.

- **City of Trenton**

The City of Trenton is a Sub-Metropolitan Revitalizing Center in the *Horizons 2025 Plan*, which is consistent with its designation as a Planning Area 1. DVRPC's revitalization and redevelopment policies for Core Cities like Trenton are consistent with the Preliminary Plan map.

V. Indicators and Targets

The Preliminary State Plan includes both indicators and targets to track implementation and performance of the plan, including evaluation of plans submitted for Plan Endorsement. DVRPC has also developed plan indicators. Two *Regional Indicators* reports (1998 and 2000) were prepared in conjunction with the Year 2020 and 2025 Plans, respectively. A third report will be prepared later in Fiscal Year 2005. Each report describes physical form, environment, traffic congestion, economic development, mobility, air quality, housing and freight movement indicators to track progress on plan implementation in the Delaware Valley region. The intent of DVRPC's indicators is consistent with the proposed State Plan's indicators, particularly those on Physical Form. These indicators are similar to the "headline" indicators in the Preliminary State Plan. However, the State Plan indicators are more extensive than those developed by DVRPC.

Although population and employment forecast targets were prepared for the Year 2000 Plan, DVRPC's subsequent long-range plans have not included targets for population, employment or any other plan component. The Plan's recommended strategies and policies are intended to help achieve an overall vision for the Delaware Valley region in the Year 2025; interim targets are not provided.

Since the DVRPC region is a Severe Non-Attainment Area for Ozone pollution, the adopted Plan must be reviewed and readopted every three years (under current transportation authorizing legislation). Thus, the planning assumptions and adopted forecasts are not fixed in place, and can be reviewed and adjusted on a relatively frequent basis to reflect changing external conditions or new planning issues. DVRPC also has a clear process for amending the adopted plan, which is typically used to accommodate new or revised transportation projects or revisions to designated sewer and water service growth areas.

VI. Recommendations/Actions

Based on DVRPC's Cross-Acceptance review, we offer the following recommendations and action steps for consideration by the Office of Smart Growth, DCA and the State Planning Commission.

- DVRPC's adopted county and municipal population and employment forecasts, cooperatively developed with the four South Jersey counties, should be accepted by the Office of Smart Growth, the Department of Community Affairs and the State Planning Commission as the official numbers for said counties and municipalities and incorporated in the State Plan. As described above, DVRPC recommends that the revised county-level employment forecasts for the Year 2025, developed as part of the Year 2023 Plan forecasting process, be accepted by the Office of Smart Growth and included in the State Plan.
- Although the natural resource and farmland preservation policies of the DVRPC 2025 Plan and the Preliminary State Plan are generally consistent, the maps have numerous inconsistencies. Some inconsistencies are due to scale, some may be due to differences in data availability, and some may be due to policy. In light of the significance of correctly designating critical environmental areas in Planning Areas 1 and 2 that could be affected by implementation of the new "Fast Track Law," DVRPC recommends the following:
 - a. The SDRP should show more complete coverage of Protected Lands. Discounting the Pinelands Management Area, the map currently only shows a category called Parks and Natural Areas. This coverage leaves out the categories Preserved Farms and Land Trust protected lands. In addition, the SDRP maps are missing some county and municipal parkland. DVRPC is currently able to share a GIS protected lands file showing federal, state, county and municipal parkland, preserved farmland, and land trust protected lands as of December 2003. By January 2005, DVRPC will have an updated file to December 2004. All Protected Lands should be shown on the map and given a designation that clarifies that they are not intended for future growth.

- b. DVRPC has completed an Open Space and Farmland Preservation Plan for Camden County, and numerous Environmental Resource Inventories (ERIs) and Open Space Plans for municipalities throughout the region. We encourage the state to work with the counties and municipalities to use these plans and ERIs to define Critical Environmental Sites in Planning Areas 1, 2, and 3. Alternatively, change appropriate portions of Planning Areas 1 and 2 to Planning Areas 3, 4 or 5.

Conclusion

DVRPC supports and commends the Office of Smart Growth for their extensive and comprehensive Cross-Acceptance process to obtain review comments on the Preliminary State Plan. Through the subsequent Plan Negotiation and Endorsement process, DVRPC will coordinate the issues and recommendations noted in this Cross-Acceptance Report with the Office of Smart Growth. The primary goal of the negotiating process will be to resolve any substantive differences and to seek agreement on the Plan's Year 2025 forecasts and the Protected Lands mapping discrepancies. We believe that individual, policy-oriented map designation changes should be dealt with through the municipality-county-state Cross Acceptance process. DVRPC staff looks forward to beginning a constructive dialogue on these matters with the Office of Smart Growth later this year.