



State of New Jersey

DEPARTMENT OF STATE
NEW JERSEY STATE PLANNING COMMISSION
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TRENTON NJ 08625-0820

CHRIS CHRISTIE
Governor

GERRY SCHARFENBERGER, PH.D.
Director

KIM GUADAGNO
Lieutenant Governor

**New Jersey State Planning Commission
Minutes of the Meeting Held on January 18, 2012
State House Annex
Committee Room 1
125 West State Street, Trenton, New Jersey**

CALL TO ORDER

John Eskilson, Vice-Chair, called the January 18, 2012 meeting of the New Jersey State Planning Commission (SPC) to order at 9:36 a.m.

OPEN PUBLIC MEETINGS ACT

Vice-Chair Eskilson announced that notice of the date, time and place of the meeting had been given in accordance with the Open Public Meetings Act.

ROLL CALL

Members Present

Kenneth Albert, Public Member
John Eskilson, Public Member
Roberta Lang, Designee for Douglas Fisher, Secretary, Department of Agriculture
Greg Acquaviva, Designee for Lt. Governor Kim Guadagno, Department of State
Joyce Paul, Designee for Richard Constable, Acting Commissioner, Department of Community Affairs
Shing-Fu Hsueh, Mayor, West Windsor, Public Member
Marc Larkins, Chief Executive Officer, Schools Development Authority
Michele Siekerka, Designee for Bob Martin, Commissioner, Department of Environmental Protection
Thomas Michnewicz, Public Member
Andy Swords, Designee for James Simpson, Commissioner, Department of Transportation

Not Present

Caren Franzini, Chief Executive Officer, NJ Economic Development Authority
Edward McKenna, Chairman, Public Member

Others Present

(See Attachment A)

PLEDGE OF ALLGIANCE

Vice-Chair Eskilson asked everyone to stand for the Pledge of Allegiance.

APPROVAL OF MINUTES

Vice-Chair Eskilson asked for a motion to approve the minutes of the November 14, 2011 meeting. Commissioner Swords made the motion and it was seconded by Commissioner Hsueh. There were no discussions, comments or changes. All were in favor, no opposed or abstentions. The minutes for November 14, 2011 were approved.

Vice-Chair Eskilson asked for a motion to approve the minutes of the December 7, 2011 meeting. Commissioner Michnewicz made the motion and it was seconded by Commissioner Lang. There were no discussions, comments or changes. All were in favor, no opposed or abstentions. The minutes for December 7, 2011 were approved.

CHAIR'S COMMENTS

Vice-Chair Eskilson asked for a motion to approve Resolution No. 2012-01 Approval of the Annual Meeting Schedule for the State Planning Commission for 2012. Director Scharfenberger noted that the schedule was a tentative schedule for the rest of year and the meetings would be confirmed prior to being held. Vice-Chair Eskilson asked for a motion to approve the schedule. Commissioner Michnewicz made the motion and it was seconded by Commissioner Swords. There were no discussions, comments or changes. All were in favor, no opposed or abstentions. Resolution No. 2012-01 was approved as presented.

Vice-Chair Eskilson asked for nominations for Vice-Chair of the SPC. Commissioner Lang nominated Vice-Chair Eskilson and the nomination was seconded by Commissioner Michnewicz. There were no discussions or other nominations offered. All were in favor, no opposed or abstentions. The motion carried.

Vice-Chair Eskilson moved to the SPC subcommittee's reorganization item on the agenda. Director Scharfenberger noted that if everyone was fine with the current membership for the subcommittees they could continue as currently organized.

Vice-Chair Eskilson reaffirmed the membership for the committees; Plan Implementation Committee (PIC): John Eskilson, Ken Albert, Doug Fisher, Kim Guadagno, Bob Martin, Tom Michnewicz and James Simpson and the Plan Development Committee (PDC): Ed McKenna, John Eskilson, Doug Fisher, Kim Guadagno, DCA Commissioner, Bob Martin and James Simpson. Vice-Chair Eskilson asked for a motion to approve the members of both the PIC and PDC as presented. Commissioner Michnewicz made the motion and it was seconded by Commissioner Lang. There were no discussions, comments or changes. All were in favor, no opposed or abstentions. The PIC and PDC were approved as presented.

DIRECTOR'S REPORT

Director Scharfenberger reported on the dates for the six public hearings on the draft Final State Strategic Plan and a provided a brief outline of the agenda format for the meetings. He also stressed that public comments could be submitted up to 30 days following the conclusion of the last public hearing. Director Scharfenberger noted that he and Deputy Director Kennedy are continuing to present on the draft SSP in various venues and overall had received positive responses.

Director Scharfenberger also reported that OPA had received correspondence from numerous residents inquiring if the SSP was related to the U.N. initiative known as Agenda 21. He stated for the record that the draft SSP was in no way, shape or form related to Agenda 21. Director

Scharfenberger explained that the SSP is a sound economic development plan that balances growth with preservation, plans wisely for State investment in infrastructure, streamlines and aligns government agencies and eliminates redundant/conflicting regulations. The SSP was constructed with respect for local governments and their decision-making capabilities – a hallmark of private property owners making their own land use decision. It was also stated that the SSP was not a state mandate, rather, a framework to give local and county government's direction and clarity as to the State's vision for economic growth and development.

Lastly, Director Scharfenberger reported that OPA staff continues to work on the remaining Plan Endorsement (PE) petitions and letters were currently being finalized to be sent to the individual municipalities still in the PE process.

NEW BUSINESS

Dan Kennedy, Deputy Director for the Office for Planning Advocacy provided a presentation on staff recommendations to have the SPC initiate a map amendment in Galloway Township, Atlantic County. Deputy Director Kennedy explained that the draft final SSP calls for the phasing out of the State Plan Policy Map in mid-2013. He explained that the current State Planning Rules allow for the SPC to self-initiate planning map changes based on technical corrections. The technical corrections must be based on information that had changed and the underlying rationale for the original planning map designation. Deputy Director Kennedy further explained that OPA staff was making the recommendation to the SPC as an interim measure while the SSP was being publically vetted during the rule-making process.

Deputy Director Kennedy noted that a positive action taken by the SPC would not be a final action, but an action to initiate the process for a map amendment. Deputy Director Kennedy explained that that the requirements for a map amendment include holding a public hearing in the vicinity of the proposed map amendment and providing written notice to all owners of the said property, as well as, all owners of the said property within 200 feet in addition to public notification within the municipality. After the public hearing the SPC would consider the input received and then make a finding whether or not the map change was appropriate. The final action would be taken by official resolution. Deputy Kennedy further noted that should the SPC move forward, a formal recommendation would not be made for at least two months.

Deputy Director Kennedy provided a detailed presentation on the recommendation explaining that there was a parcel in Galloway Township (Lot 951, Lot 1.01) where an 18 acre portion had been identified as Planning Area 5. He noted that the underlying assumption for the Planning Area 5 designation had been made based on maps that had not been ground verified. Deputy Director Kennedy explained that the area in question was regulated by DEP and CAFRA regulations and that the relationship between the State Plan Policy Map and CARFA made the map designation extremely important. He further explained that the Permit Extension Act extended center designations in the CAFRA zone, but excluded areas designated as Planning Area 5. Therefore, the 18 acres portion had been carved out of the center. He further explained that the impact of the removal of the area from within designated center changed the impervious coverage limits under CAFRA and removed the area from the sewer service area.

Deputy Director Kennedy noted that OPA staff was recommending that the designation of Planning Area 5 be changed to Planning Area 2. He explained that the area was within a center that had been designated by the SPC, at the request of the Galloway Township, in 2001, and that the underlying planning map designation remained. In addition, field verification had been completed, a letter of interruption regarding the wetlands concerns had been issued and DEP had confirmed that no environmental constraints exist within the 18 acre portion.

The recommendation was also being based on a policy perspective consistent with the municipal master plan and proposed State infrastructure improvements along the Parkway.

Deputy Director Kennedy also noted that the area in question was within a planned growth area in Galloway Township in the 2001 State Plan and that the SSP looks to prioritize growth in center based areas and regionally.

Deputy Director Kennedy clarified that the OPA staff recommendation was to judicially consider a recommendation for a minor map amendment, as allowed under the State Planning Rules, authorize staff to initiate the public notice hearing process and report back to the SPC with recommendations after the public hearing and for the SPC to be open to consider future amendments of the same nature on a case by case basis as an interim measure until the new criteria was in place.

Vice-Chair Eskilson opened the floor to Galloway Township representatives for comments. On behalf of the Galloway Township, Tiffany Cuvillo, Township Planner, commented on behalf of the township that the Township was in support of the minor map amendment from a Planning Area 5 to Planning Area 2 being consistent with the wetlands determination.

Vice-Chair Eskilson asked for comments or questions from the SPC. There were none at this time.

Vice Chair Eskilson opened the floor to public comments on the Galloway Township matter.

Public Comments on Galloway Township Map Amendment

Tim Dillingham, Executive Director of the American Littoral Society cautioned the SPC from moving forward on the ad-hoc amendment to the State Plan that was currently in place. He noted that he was concerned that there was no process in the place for how the SPC would deal with multiple amendments of the same nature. He was also concerned that the map amendment was to remove land from an environmentally sensitive designation to a designation that allows for more intensive growth. Mr. Dillingham further noted that even though, Mr. Kennedy, discussed the matter with him prior to the meeting there were no documents available to the public prior to the meeting, as well as not having access to the evaluations conducted by the DEP. He was also concerned that there was no discussion about consistency with the Pinelands Regional Master Plan. Lastly, he was concerned that the floodgates would be opened if the SPC moved forward without safeguards in place to ensure that amendments were reasonable, well thought out and linked to a comprehensive process.

With no further comments from the public on this matter the floor was closed to the public comment.

Commissioner Albert made a motion to accept the OPA recommendation with respect to the Galloway Township matter and it was seconded by Commissioner Michnewicz. Vice-Chair Eskilson asked for discussion or comments from the SPC.

Commissioner Albert noted he felt that the action being taken was the beginning of a process that allowed for a public hearing and public input. He further noted that he felt the recommendation was well thought out, was consistent with the State Plan and the only avenue open to the SPC during the interim phase of adopting the draft SSP and proposing revisions to the State Planning Rules. Mr. Albert further noted he was impressed with DEP's flexibility and that he supported OPA's recommendation.

Hearing no further comments from the SPC, Vice-Chair Eskilson asked for a roll call vote. Ayes: (10) Ken Albert, John Eskilson, Roberta Lang, Greg Acquaviva, Joyce Paul, Shing-Fu Hsueh, Marc Larkins, Michele Siekerka; Thomas Michnewicz, Andy Swords. Nays: (0). Abstains (0).

Priority Growth and Preservation Investment Area Criteria Proposal Presentation – Deputy Director Kennedy provided background on the existing Policy Map Status and the future Criteria-based System. Deputy Director Kennedy explained that the draft Final State Strategic Plan (SSP) calls for the transition away from the State Plan Policy Map (PM). The SSP proposed to use the PM until

approximately mid 2013 and makes the recommendation that the SPC consider utilizing the PM amendment procedures in the current State Planning Rules as an interim step. Next, Deputy Director Kennedy explained that the SSP calls for a criteria-based system to replace the PM and calls for the criteria-based system to be instituted within the State Planning Rules. He noted that OPA staff was currently working on a pre-proposal that would be available for public comment prior to the start of the public hearings.

Deputy Director Kennedy further explained that the criteria-based system would be connected to the SSP through the proposed Garden State Values and Principals for State Decision Making. Next, Deputy Director Kennedy discussed the proposed details of the criteria-based system, noting that if the SSP was adopted as proposed, a new chapter of the State Planning Rules would need to be created and would apply to the designation of land to new SPC designations and the process by which a regional agency could propose to designate additional areas within a region. Deputy Director Kennedy explained that lands would need to meet one of the criteria identified to be designated as a "Priority Growth Investment Area", land where growth and redevelopment is preferred and where state investment to support growth and redevelopment is encouraged; the "Priority Preservation Investment Areas" would be lands for preservation, protection and stewardship are preferred and where state investment to support preservation, environmental protection and stewardship would be encouraged; land that did not meet the criteria for the "Priority Growth Investment Area" or the "Priority Preservation Investment Areas" would be identified as "Limited Growth Areas" and characterized as being within a sewer service area or not within a sewer service area.

Deputy Director Kennedy identified a number of terms that would either require new or revised definitions. New definitions -- "Agricultural Development Area", "Corridor", "Critical Environmental Areas", "Limited Growth Area", "Priority Growth Investment Area", "Priority Preservation Investment Area" and "Regional Innovation Cluster". Revised definitions would be needed for the following: "Center", "Center Boundary", "Center Designation" or "Designated Center", "Prior Center Designations" or "Previously Designated Centers", "Regional", "Regional Agency" and "Regional Entity".

Next, Deputy Director Kennedy discussed the relationship between SSP and the areas that fall under the jurisdiction of the New Jersey Meadowlands Commission, the New Jersey Pinelands Commission and the New Jersey Highlands Council.

Deputy Director Kennedy explained that a regional entity would have the ability to designate additional lands after meeting certain conditions. Some conditions would include meeting "Minimum Standards for Consideration" set by the SPC, requirements for municipal "buy-in" and public participation, recent local or regional plans, a minimum scale for consideration, limited additions of land in areas in regional planning areas designated by statute and require a cross-review with the SPC and expired SPC "Designated Center" and non-expired centers could have their expiration dates removed. There was a discussion of additional considerations for additions to "Priority Growth Investment Areas" and "Priority Preservation Investment Areas" with respect to "essential" characteristics and "non-essential" characteristics.

Lastly, Deputy Director Kennedy discussed some items that the SPC would need to consider as the new criteria-based system was put into place. Those items included defining regional entity, responding to regional entity request, responding to agency an inquiry, responding to landowner inquires, the policy frameworks connection with the Garden State Values/Principle for State Decision Making/Steering Committee and statutory linkages.

Vice-Chair Eskilson thanked Deputy Director Kennedy for his extraordinarily through job in framing the discussion and staff for methodically moving the criteria-based system conversation forward.

Vice-Chair Eskilson asked for comments or questions regarding the presentation. Hearing none, Vice-Chair Eskilson opened the floor to the public for comments on the presentation.

Public Comment on Presentation Priority Growth and Preservation Investment Area Criteria Proposal

Shelly Kennedy, resident of Atlantic Highlands (Monmouth County) expressed concern over the lack of information on how the Priority Growth and Preservation Investment Areas would protect the private property owner's rights. She further noted, she didn't see where in the different layers of government (regional, state, local) the private property owner had the ability to protect themselves and provide their input in the whole process moving forward.

Vice-chair Eskilson responded that that the SPC has always had the intent to be as transparent as possible. He noted that he felt the intent of the SSP was to streamline and be more transparent to the local property owner. He explained that the SPC could only act within the context of the State Planning Act. As for staying engaged in the process, Vice-Chair Eskilson suggested that Ms. Kennedy bookmark the website, explained that comments need not be made in person, the OPA staff is always available via phone and encouraged the submission of written comments. He also noted that individual comments would be considered and heard although not always resulting in the answers a commenter may want to hear.

Chris Sturm, New Jersey Future thanked the SPC for the opportunity to comment and for the fact that staff had put forward the criteria based system before the start of the public hearings. Ms. Sturm asked if the PowerPoint presentation would be available. Director Scharfenberger responded that the information was currently in draft form and a work in progress. Therefore, it would not be posted at this time.

Ms. Sturm noted that from New Jersey Future's perspective the criteria based system did respond to the State Planning Act with a vision for growth in places with existing infrastructure and the preservation of environmentally sensitive and rural areas. Ms. Sturm suggested that all transit hubs, and all train station areas be considered for the State designated priority investment areas since the areas have the strongest markets and the State has vast investments in infrastructure. Next, Ms. Sturm suggested that a screening process be in place for any area that had not already been vetted as a growth area and that the area have wastewater, water, and minimal environmental constraints. It was also suggested that a screen for planned for sewer service areas in updated wastewater plans be in place as well. Updated sewer service areas should be a pre-requisite for priority growth investment areas. Ms. Sturm noted that the non-essential characteristics still require a lot more work. A screen should be in place to prevent the sort of greenfield development in areas that lack infrastructure or, compelling reasons for growth. Criteria that are of concern within a half mile of State highways may result in excessive traffic generators. The definition of corridors are growth areas but should not be used to encourage strip development. Lastly, Ms. Sturm noted that she felt that because the state criteria was objective and straight forward that it could possibly be mapped.

Helen Heinrich, New Jersey Farm Bureau commented that the definition of the agricultural development area used by the State Agricultural Development Committee (SADC) would need to be scrutinized if the SPC were to utilize their definition. She noted that SADC areas were not mapped with the idea that there be a firm relationship to the future use of the land. Ms. Heinrich further noted that one of the most important parts of the first State Plan was the equity policy and that the equity concept needed to be addressed in the SSP. Lastly, Ms. Heinrich noted that no permanent funding source had been identified and hoped the SPC would work on that issue.

Janna Chernetz, NJ Advocate from the Tri-State Transportation Campaign commented that there was a lot of emphasis on transit oriented development and capturing the value of growing in those areas in the SSP but was concerned that there was not more emphasis in the proposed criteria. She noted that the State should be capitalizing on and focusing on the benefits of transit oriented development and hoped that the criteria for priority investment growth areas would include transit hubs.

Vice-Chair Eskilson clarified that the presentation today was conceptual with respect to criteria and that the SPC was not establishing the criteria or taking any formal action on the presentation. He noted that the comments being received today were the types of comments that the SPC and OPA staff were looking for as the criteria evolves.

Eileen Swan, Executive Director of the Highlands Council thanked Director Scharfenberger and Deputy Director Kennedy for the opportunity to work together and coordinate the work already accomplished in the Highlands. She also noted her concern of placing the PowerPoint presentation on the website and thereby given the public the impression the process was done. Ms. Swan explained that the Highlands Council has gathered a great deal of information and analysis in direct response to the mandates of the Highlands Act. She noted that it is important that the work and data collected by the regional agencies not be lost in translating the priority growth investment areas and preservation areas in the SSP. Lastly, Ms. Swan noted that the Highlands data collection was located on the Council's website.

Vice-Chair Eskilson thanked Ms. Swan for always working collaboratively with the SPC and agreed that clarity was needed with respect to the relationship between the criteria based system and the regional entity processes.

With no further comments from the public, Vice-Chair Eskilson closed the floor on this matter.

PUBLIC COMMENTS

George Gallenthin of Woodbury, New Jersey commented that he was concerned about the comments that were made by the Director in the opening remarks. Mr. Gallenthin noted that the structure of the State Plan fails to provide private property owners the right to exercise their authority over their land and to give input into the planning process. He noted that the State Plan blocks due process and that a three minute comment period at the end of the planning process was insufficient. Mr. Gallenthin noted that there needs to be some type of device created for landowners to be able to have input in the beginning of the process. Mr. Gallenthin, explained that he owned a 63 acre parcel in a portfield in Paulsboro, NJ, has a 7-0 decision from the New Jersey Supreme Court, but the local officials are telling him how he can use his land, the Supreme Court felt that was insufficient. Lastly, Mr. Gallenthin noted that the terms throughout the State Plan were in fact Agenda 21 and the landowners are going to organize and stop the State Plan.

Mark Terriblile from Aberdeen New Jersey read a written statement on the draft SSP, which was provided for the record. (Attachment B).

Shelly Kennedy from Atlantic Highlands noted the SSP in fact does some good things such as putting oversight under the different agencies that now compete and make it impossible to develop. Ms. Kennedy noted that the SSP appears to have a structure in place to do a complete takeover of the private property owner's property and understood that was not the intent. Some other concerns noted by Ms. Kennedy included the lack of certain definitions such as sustainable development.

Ms. Kennedy referenced the Republic National Committee denouncing anything to do with Agenda 21 and cautioned the SPC on how the SSP was currently written, which leaves the door wide open for major abuses in this area. Ms. Kennedy discussed several suggestions that would improve the SSP, such as defining the terms, omitting social engineering goals, removing references to vertical integration with the federal government regarding land use, and adding a paragraph that says this plan was not binding on the State, county or local governments, has no legal effect, carries no mandates, is solely intended to lay out a vision of the Governor, and can be implemented through changes to existing law through appropriate legislative and constitutional processes.

Ms. Kennedy suggested that the SPC not scrap the SSP but extend the time to develop the final plan, work some major revisions that would protect the private property owner, better define the terms

within the SSP and reassure the public moving forward the SSP is not going to become a top down Soviet-style structure. Lastly, Ms. Kennedy discussed what sustainability meant with respect to the Brundtland Commission and provided the SPC with a number of documents to review.

Director Scharfenberger noted that the OPA has been very receptive and having been taking comments from the start of the process and would continue to accept comments allowing everyone to have their voices heard.

Ms. Kennedy noted it was important for the private property owner to get their comments heard on the official record since the property owner was the source of income that will pay for the development. She felt that more public input was needed as well as a delay in implementation in order to take into consideration the comments regarding the protection of the private property owner rights.

Tim Dillingham, Executive Director of the American Littoral Society commented that there was a very broad public interest that underlies the work of the SPC that needs to be measured against the interest of private property owners to develop their property. He noted that private property rights do not extend to the idea of unfettered development without taking into consideration the impact upon the public and other adjacent or nearby or statewide property owners. Mr. Dillingham noted that he was commenting simply because he did not want the extreme to dominate the political discourse which was going to underlie the SPC actions. He further noted that the environmental community had concerns about the themes that were being woven into the SSP about minimal state oversight and municipal decisions. Mr. Dillingham also noted that as the SPC moves forward the goals need to be measured against the reality that there is public interest and it needs to be respected and acknowledged. He also commented that the idea of not regulating individual private actions where they might pose harm to the broad environment, to public health or neighboring landowners was not one that is either found in the constitution or in the history of the country. Mr. Dillingham stated that he did not want the extreme viewpoints to dominate the conversations regarding the SSP as the process moved forward. Lastly, he thanked the SPC for their time and noted that he looked forward to the public hearings and additional details on the criteria based system.

With no further comments, Vice-Chair Eskilson closed the floor to public comment.

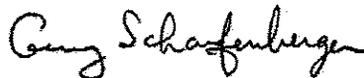
COMMISSIONER REPORTS

Andy Swords, Department of Transportation thanked Mayor Hsueh for his hard work in helping West Windsor achieve their vision of a Transit Village.

ADJOURMENT

With no further comments from the SPC or the public, Vice-Chair Eskilson asked for a motion to adjourn. The motion was made by Commissioner Lang and seconded by Commissioner Michnewicz. All were in favor. The meeting was adjourned at 11:01 a.m.

Respectfully submitted,



Gerry Scharfenberger, Ph.D.
Secretary, State Planning Commission

Dated: January 24, 2012

NEW JERSEY STATE PLANNING COMMISSION

Attachment A

DATE: JANUARY 18, 2012 TIME: 9:30 AM

LOCATION: COMMITTEE ROOM 1, STATE HOUSE ANNEX, TRENTON, NJ

NAME	AFFILIATION & ADDRESS	PHONE
GALLENTHIN, GEORGE	GALLENTHIN REALTY DEVELOPMENT, INC.	
MEGWORTHINGTON	Megworthington, Frankel R.B.	
VIVIAN E BAKER	NJ TRANSIT	
Nick Mennas Esq	FOX ROYNSCHILD	
SUSAN WEBER	NJ DOT	
NEAL LEITNER	County of Sussex	
Jim Lewis	NJ DOT	
Peter Vandenberg	B56	
Anthony Soriano	Morris County Planning & Development	
John Spurr	NJF	



NEW JERSEY STATE PLANNING COMMISSION

DATE: JANUARY 18, 2012 TIME: 9:30 AM

LOCATION: COMMITTEE ROOM 1, STATE HOUSE ANNEX, TRENTON, NJ

NAME	AFFILIATION & ADDRESS	PHONE
Elizabeth Parvler	NJ Chamber of Commerce 216 W. State St. Trenton	
Tiffany Cuvillo	Gallows Top 300E Jim Leeds Rd	
Lucy Vandenberg	Plan Smarts NJ 118 W State St Trenton NJ	
Shelley Kennedy	Atlantic Highlands, NJ	
Blunt Henderson	American Littered Society Highlands 0782 18 Hartshorne Dr	
Carlos Rodrigues	NJBA	
Janna Chernetz	Tri State Transportation Campaign	



Comment on the Draft Final State Strategic Plan: New Jersey's State Development and Redevelopment Plan.

1/18/2012

The Draft Final State Strategic Plan for New Jersey's Development and Redevelopment raises many concerns. I wish to focus on just one logical fallacy that appears first in the Executive Summary and suffuses the document. I'm picking this one out because it shows that the plan starts from faulty premises.

... economic prosperity balanced with natural resource preservation ...

"Preservation" and "resources" are incompatible notions. A resource is something to be used, not to be preserved. Preservation applies to assets. One may conserve electricity; one does not preserve it. But one may preserve the power plants and transmission lines that carry the electricity. Likewise, one may preserve a river by conserving the water taken from it for use.

One would conserve forestland if the intent were to develop it or use it someday. If one preserves it, the intent is to never use it.

This confusion muddies the intent of the document and may camouflage the actual agendas which the plan was written to support. The reader who accepts the fallacy embedded in this phrase near the top of the executive summary will have a hard time evaluating what the plan would actually accomplish. And because this confusion pervades the plan, it may be possible to read the plan to support one or another of various incompatible agendas. That is not what a responsible government plan should do.

Mark Terribile
Aberdeen, New Jersey