



State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
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Executive Director

November 8, 2006

The Honorable Meir Lichtenstein
Mayor of Lakewood Township
231 Third Street
Lakewood, NJ 08701-3220

Re: Lakewood Township Petition for Initial Plan Endorsement

Dear Mayor Lichtenstein:

I would like to commend Lakewood Township for working diligently towards pursuing Initial Plan Endorsement through the agreed-upon Memorandum of Understanding (MOU) and Action Plan. As the Township nears the end of the six-month extension, I would like to take this opportunity to provide you with the state agency perspective, preliminary evaluation and concerns regarding the Township's petition, based on materials that have been submitted thus far, in accordance with the Action Plan.

Lakewood Township submitted Plan Endorsement Action Plan Status Reports dated September 22, 2006 and October 23, 2006 to the Office of Smart Growth (OSG). While the Township has provided information in response to the Action Plan items, the status reports and associated plans do not address the issues outlined in OSG's consistency review letter dated May 23, 2006. This letter serves to outline the consistency issues that remain with the petition.

Proposed Regional Center

The proposal to allow for almost the entirety of the municipality to be designated as a Regional Center is inconsistent with the State Plan and significantly exceeds criteria for size, population and employment. The State Plan notes that Regional Centers "should be compact and contain a mix of residential, commercial and office uses at an intensity that will make a variety of public transportation options feasible" (page 241). Additionally, the State Plan stipulates (page 241) that new Regional Centers should be identified as a result of a strategic planning effort conducted on a regional basis, which includes participation by the private sector, municipalities, counties and state agencies that represent the major actors in the development of the region and is identified in county and municipal master plans. Accordingly, this did not take place.

As a result of the August 9, 2006 workshop between the Township and state agencies, we believed that the proposed cores would be the starting point for a discussion of several potential centers.

Even with the relevant natural resource protection ordinances, there will likely be property owners and investors in the center who encounter environmental regulations and other difficulties they would not

expect in a designated growth area. As much as possible, environmentally sensitive areas should be excluded from center boundaries.

Center Concepts (including Road Networks, Open Space & Recreation)

Descriptions for most of the proposed “cores” are generic, stating that there will be mixed uses without any approximations as to what those uses would be, the scale of development, or the general layout of the centers, including road network concepts that will minimize additional traffic pressures on Route 9. More details are necessary, especially since the current zoning has single-use districts for most of these cores; mixed uses would represent a major change.

Considering the projected development and growth, the petition also needs to discuss the provision of open space and recreation facilities, especially at the walkable neighborhood level. We hope that the Township provides greater detail for these concepts in the updated Master Plan due at the end of this six-month extension, including recommendations for zoning amendments to allow for mixed uses. A significant part of the state agencies’ consistency determination for this petition will hinge on the Master Plan and how the petition addresses issues outlined in this letter.

In addition to providing more details, the Master Plan or petition will need to address the following comments on specific cores:

- As mentioned in OSG’s May 23, 2006 consistency review letter, the Township’s current Master Plan proposes the application of Residential Site Improvement Standards (RSIS) to resolve downtown parking issues. We would like to reiterate to the Township that RSIS is not a requirement for mixed-use areas such as downtown and that the application of those standards may instead hurt the neighborhood character; i.e. by potentially creating excess parking. The petition has yet to propose alternatives.
- The Township’s September 22, 2006 update states that the Campus Core will contain no retail or commercial development. If this area is to develop as a college town setting, there should be consideration for appropriate retail and services that serve both the academic population and neighborhood residents.
- Regarding the proposed Affordable Housing Core, the Draft Housing Element and Fair Share Plan (October 20, 2006) states that “the proposed affordable housing is situated in a proposed core that incorporates a variety of housing types, schools, retail satellite areas, and recreation” (page 25). Please clarify what the plan means by “retail satellite areas.” The term seems to indicate that rather than creating a neighborhood Main Street, retail uses will be located on the periphery of the proposed Core, separate from residential areas and catering more to customers arriving by car than on foot. If such is the case, this new development will not fit the State Plan definition of a Center or Core.

Southwest Acquisition Area Redevelopment Plan Amendment

OSG’s consistency review letter discussed the redevelopment plan for this area and its proposal for a suburban office campus. Since the date of the review, the Township has approved an office campus project following the very same redevelopment plan for which the state outlined a number of inconsistencies. In the petition, the Township calls this a Corporate Office Core. A suburban-style single-use office campus does not fit the State Plan definition of a Core or Center. The September 22, 2006 update states that “this area has the potential for mixed-use infill development in the future in association with the New Hampshire mixed-use multi-modal core” (page 3). Considering that OSG raised concerns with the redevelopment plan back in May, the Township should explain why it had not made any effort to revise the plan but instead moved forward with the office campus proposal. The petition should also clarify when the aforementioned “mixed-use infill development” on this site might occur, in light of the fact that new construction for the area has just recently received local approvals.

Affordable Housing, Growth Projections and related matters

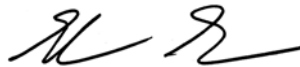
As the Township and state agencies discuss center boundaries and work to resolve the remaining consistency issues, the outcomes may impact affordable housing proposals, growth projections, and other aspects of the Township's planning. The Township will need to revise these items as necessary so that all the local planning documents are internally consistent as much as possible.

Conclusion

We look forward to receiving the remainder of the action plan items for Lakewood Township's petition for Initial Plan Endorsement by November 23, 2006. Once we receive these materials, OSG and the state agencies will review them for consistency with the State Plan. If additional information is needed, Lakewood will be provided with additional time to provide the required information.

Thank you again for your participation and dedication to the Plan Endorsement process. Please feel free to contact Jung Kim, Area Planner for Ocean County, with any questions or concerns at 609-633-6139 or at jkim@dca.state.nj.us.

Sincerely,



Eileen Swan
Executive Director

ES:jk:dds

c: Raymond Coles, Deputy Mayor
Bernadette Standowski, Municipal Clerk
Frank Edwards, Municipal Manager
Edward Delanoy, Municipal Attorney
Stanley Slachetka, PP/AICP, Planning Consultant, T&M Associates
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State agency representatives *via email*