



American Planning Association
New Jersey Chapter

Making Great Communities Happen

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On behalf of the New Jersey Chapter of the American Planning (APA-NJ), we submit the following comments on the State of New Jersey's proposed Substantial Amendment for the Second Allocation of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan, which describes how the State proposes to spend the \$1.46 billion second installment of CDBG-DR funding for Sandy recovery.

APA-NJ is comprised of New Jersey-licensed professional planners with considerable experience and expertise in the field of environmental, redevelopment, and housing planning, who provide advice and guidance to the 1,100 chapter members and to New Jersey governmental officials on planning policy issues, programs, legislative proposals, and regulations.

While APA-NJ fully appreciates the unprecedented scope of the effort to bring New Jersey and its citizens and businesses back on their feet, coordinating between State, federal, and local agencies and building capacity to properly and effectively administer the \$1.46 billion in funding must be a first priority. Not only does the public deserve as many opportunities to provide comment on how \$1.46 billion will be spent in their communities, their input informs better decision making.

How the State plans to incorporate and include its professionals, both public and private, with the expertise necessary to build Jersey Stronger is as critical now as it was at the start of this recovery process. No one entity can nor should do this alone. Jersey Strong is not merely an adjective, it's a pursuit.

Long Term Planning and Recovery

We strongly believe that the Action Plan is not a substitute for good planning or the need for accredited professionals with experience. In our view, the Action Plan must be accompanied by a comprehensive coastal mitigation plan that identifies vulnerabilities, pending projects, future projects and funding sources. This information needs to resonate down through county government and with the municipalities to ensure the regional focus is not lost. We recommend that additional funds be allocated to the counties and other regional entities to develop regional recovery and resiliency plans and policy recommendations that are specific and appropriate for the municipalities within the region. Moreover, the State's Strategic Plan needs to be adopted and implemented in order to leverage the power of the State Agencies working together in a coordinated way.

Long-term disaster recovery (and resiliency) can take up to 5-10 years, if not more. We urge you to consider increasing the funds for the planning grants in order to meet the goals of building and rebuilding more resilient communities. At this time, the funds available (assuming \$5 million for grants) might provide half of the amount of actual need if New Jersey is serious about building itself a true sustainable and resilient economy. The needs for communities to complete planning actions, such as updating or replacing Master Plans, updating ordinances, conducting vulnerability assessments and participating in the Community Rating System to build and rebuild more resiliently are enormous.

The following is what APA-NJ believes depicts the average funds necessary to rebuild in a more responsible manner.

- I. **Master Planning:** Many NJ towns have Master Plans that are 20-30 years old and need to be overhauled and brought up to 21st century standards. A re-examination as provided for in the Municipal Land Use Law (MLUL) is not a substitute for the comprehensive planning process that a master plan entails. We recommend more funds be devoted to this task for the preparation of new or updated master plans by increasing the grant allowance to \$75-80K. Additionally, recipients of these grant funds should be required to participate in State and county mitigation planning projects to ensure that those efforts are reflected locally and real estate investments serve to implement those efforts.
- II. **Community Rating System:** This program allows for communities to identify actions they take to reduce the damage risk to residences, infrastructure and community facilities in order to reduce the cost of insurance. This program also helps to identify actions communities can take to further reduce risk and insurance premiums. We would like to see funding dedicated to this to enhance, as needed, the resources that are being offered to municipalities from outside sources. We believe the cost could range from \$5,000-30,000.
- III. **Vulnerability Assessments:** Consider allowing up to \$10,000 for these assessments so that municipalities can gather the local and regional information needed to rebuild

more resiliently as well as identify land use policies and planning changes they should make to their master plans and ordinances.

- IV. Ordinances: The APA-NJ recommends that the amount awarded for these grants be increased to \$50,000 based on the need to amend multiple ordinances to reach resiliency goals. The cost to update an ordinance depends upon the extent to which it is out of date. Our experience has shown that municipal ordinances in New Jersey are even more out of date than municipal master plans, and would require significant updates to be consistent with re-building and resiliency goals. (The current grant maximum is \$30,000.)

Additional Studies

The Action Plan Amendment mentions several ongoing research projects being conducted by six New Jersey universities; however, it is difficult to evaluate the individual and collective merits of this work without additional details. Additionally, the Action Plan relies upon numerous studies, technical reports and projects that are not readily accessible or properly coordinated. APA-NJ recommends that that State makes available on its website the details of the USACE dunes construction plan, including maps and background analyses, and the six university studies and technical assistance on flood mitigation strategies. This should all contribute to a state-driven information sharing resources. In addition, the State should revive the State Strategic Plan process so that a focused and supported approach to economic competitiveness can dovetail with environmental needs.

Planning Needs

While the State is not required to describe the unmet planning need, APA-NJ recommends putting more effort into clearly defining what this need is. Section, 2.5.3, states that “demand for the Post Sanding Planning Grant Assistance Program has been considerable, and continuing to support planning needs of communities remains a priority of the State and..... remains a critical recovery need.” Based on our assessment of the planning needs for master planning and ordinance activities, municipalities in the impacted region have significantly more planning needs than what is hypothesized in the Action Plan. The following is a rough breakdown of the planning investment necessary to ensure a community can remain both economically and environmentally sustainable, relevant and resilient:

\$80,000	Master Plan / Mitigation Planning
\$50,000	Ordinances
\$15,000	Community Rating System (average)
<u>\$10,000</u>	<u>Vulnerability Assessments</u>
\$155,000	(70 Municipalities)

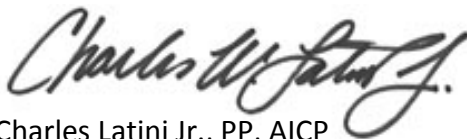
\$10,850,000 Estimated Total Need

Accordingly, the monies currently allocated for local planning falls short of meeting NJ's local need. In order to create the largest impact on reducing the risk and vulnerability of NJ's residents, infrastructure and other community assets, both a local and regional approach is crucial.

In summary, the Action Plan Amendment provides an overall framework for the receipt and distribution of CDBG-DR funds, and we believe that it will take the State further into recovery. We have outlined a number of recommendations to allow for a stronger and more resilient rebuilding effort that will better protect municipalities against future storms. Understanding the enormous pressure on all of us, we appreciate the time and effort you and your team have and continue to put toward the recovery.

Thank you for your consideration of these recommendations. APA-NJ and professional planning practitioners continue to be available for assistance to the State of New Jersey moving forward.

Sincerely,



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