

## Exhibit G

**A description of how the proposed project for which the disposal or diversion of parkland is proposed, and the proposed compensation, will support the State Development and Redevelopment Plan Goals and be consistent with the State Development and Redevelopment Plan's Policy Map and the Statewide Policies. (N.J.A.C. 7:36 26.9(d)6)**

Stafford Park is a mixed use brownfield redevelopment project that epitomizes the goals and policies enunciated in the 2001 State Development and Redevelopment Plan (the current version of the State Plan). The proposal to place renewable energy facilities on the surface of a municipal landfill that has been closed in connection with this redevelopment project further advances those policies.

Stafford Park is located in a planning area designated as PA-2 pursuant to the State Plan's Policy Map. It is located in an area designated as "regional growth" in the Comprehensive Management Plan ("CMP"). The redevelopment activities that have occurred or are planned for the project are consistent with the land uses encouraged in a PA-2 planning area and are consistent with the CMP as well as the local and county master plans. More specifically, the renewable energy facilities are permitted in regional growth and are specifically encouraged in the State Plan, particularly in concert with a brownfield redevelopment. The following discusses specific relevant policies within the State Plan.

### **Goal #1 (Revitalize the State's Cities and Towns)**

The introductory language of this goal states that projects should "incorporate ecological design through mechanisms such as solar access for heating and power generation". Stafford Park has incorporated solar on the rooftops of existing retail facilities as well as on the affordable apartments that were constructed at Stafford Park. The Redeveloper now proposes to construct solar arrays and wind turbines on or adjacent to the closed and capped landfill. It is estimated that these facilities will provide up to 70% of the electricity needed for the entire project at full build out.

The sections on Urban Design and Revitalization for Sustainability expressly encourage brownfield redevelopment such as Stafford Park. Critical elements of the redevelopment project involved the remediation of an unlicensed landfill and construction of the retail component of the project on the remediated area, and capping and closure of the Stafford Township licensed landfill.

The section on Revitalization for Sustainability encourages "the use of ecological design and technology (and) energy efficiency". Stafford Park is perhaps the most advanced redevelopment project in the state of New Jersey. All buildings have achieved at least LEED silver certification. The affordable apartments are the first in that state to achieve LEED gold certification. A primary component of the LEED certification in each instance is the use of energy conservation design and renewable energy. And, apart from LEED requirements,

Stafford Park seeks to maximize the use of renewable energy to further reduce the project's carbon footprint. Further components of the project's ecologically sensitive design include the innovative stormwater design, which eliminates 96% of total suspended solids and employs a system of bio-retention basins. In addition, recaptured rainwater is used to irrigate the entire project and local wetlands are being recharged with clean rainwater captured from rooftops. Other environmental benefits at Stafford Park are referenced in the Stafford Park Project Summary attached as Exhibit A. .

## **Goal #2 Conserve the State's Natural Resources and Systems**

The introductory language of this goal states: "Conserve the state's natural resources and systems...by promoting ecologically sound...redevelopment... in Suburban Planning areas, accommodating environmentally designed...redevelopment". Stafford Park achieves this goal for the reasons set for above both generally and as it applies specifically to the renewable energy facilities.

This section also encourages the preservation of open space. As an offset for the construction of the Stafford Park project, Stafford Township and Ocean County acquired and deed restricted 1,071 acres of land. In addition the redeveloper is required to purchase 170 Pinelands Development Credits, which through the transfer of development rights, will preserve and additional approximately 1,100 acres. Further in a settlement with the Pinelands Preservation Alliance Stafford's redeveloper agreed to pay an additional \$1 million to be used to purchase and deed restrict land. The project easily satisfies the open space preservation aspects of the State Plan without including the 57 acres of the Landfill that is proposed for use for this renewable energy project. The environmental reports submitted with the application (See Exhibits F1 – F4) document that the use of the landfill for renewable energy facilities will not affect any endangered or threatened species or otherwise negatively impact wildlife habitat nor will there be any adverse impact on water quality protection or stormwater control. .

## **Goal #3 Promote Beneficial Economic Growth, Development and Renewal**

The introductory language of this goal states: "Retain and expand businesses and encourage new, environmentally sustainable businesses.... Encourage economic growth in locations that are both fiscally and environmentally sound". New retail facilities have been constructed and are operating on what was an unlicensed landfill that was entirely eliminated via remediation by Stafford's redeveloper. Those retail stores have all achieved at least LEED silver certification. Solar arrays are providing approximately 30% of their energy needs already. Consistent with the goals of the State Plan the Redeveloper seeks to expand on those achievements.

This section goes on to encourage "green" businesses and "sustainable design" in new projects. Renewable energy is specifically referenced. The generation of fewer emissions is promoted. Stafford Park may be the most sustainable mixed use project in the state. Providing renewable energy on a closed and capped landfill further fulfills the State Plan's goals.

#### **Goal #4 Protect the Environment, Prevent and Clean Up Pollution.**

The strategy referenced immediately beneath the stated goal is fully applicable to Stafford Park. This project will “reduce pollution”. It is a “public/private partnership that uses the latest technology to prevent toxic emissions”. Stafford Park also “promotes ecological design”.

In addition to the pollution reduction, cleanup and prevention measures described above, the stormwater management system for Stafford Park generally has limited the introduction of pollutants into open waters. The project has also eliminated pre-existing pollutants from Route 72 and is recharging wetlands that were previously being filled with polluted run off.

This section specifically encourages brownfield redevelopment, which is addressed above.

#### **Goal #5 Provide Adequate Public Facilities and Services**

Stafford Park has taken advantage of the existing infrastructure servicing the area. No new or regionally expanded infrastructure has been required. Stafford Park is in the state’s sewer service area and water infrastructure existed on the site. The redeveloper reconstructed the interchange to the Garden State Parkway with private funds to the benefit of all who travel that road. By providing on site energy Stafford Park has and will reduce the need for electricity from fossil fuel fired power plants. In addition, Stafford Park contains several modern, state-of-the-art public facilities. They include the following: County Recycling Transfer Station, County Road Department, County Animal Shelter, County Clerk’s office, County Resident Recycling Drop-off, County Composting Facility, County Social Services, and Township Department of Public Works.

#### **Goal, #6 Provide Adequate Housing at a Reasonable Cost**

Stafford Park has 112 affordable apartments. As noted, this is the first affordable project to achieve LEED gold certification. Solar arrays on the rooftop of that project provide all of the common area electricity for the project. The Redeveloper plans to provide all of the electricity necessary to operate the planned market-rate apartments making them the first in the state to be powered, heated and cooled solely with renewable energy. This will ultimately control the cost of providing these services and the cost of service to the public.

Stafford Park is a mixed use community that will be constructed as a “traditional neighborhood”. Recreational opportunities, open space, pedestrian access to shopping and restaurants will be provided. The renewable energy is a critical component to the overall sustainable design. This is all consistent with Goal #6.

#### **Goal #7 Preserve and Enhance Areas with ....Open Space and Recreational Value**

As noted previously, the redevelopment of Stafford Park has already resulted in the preservation of 1,071 acres of land. In addition, Stafford Township, through its redeveloper, is providing \$1 million for the purchase and preservation of other land. The redeveloper is also acquiring enough Pinelands Development Credits to preserve over 1,100 additional acres of land. The use

of the landfill cap for renewable energy facilities does not impact any recreational or open space value to the public because public access to the landfill is prohibited and it is not used for recreational purposes.

### **Goal #8 Ensure Sound and Integrated Planning**

The “Strategy” under this goal encourages projects to be developed in accordance with regional and statewide planning. Stafford Park advances this goal. The project is consistent with the local and county master plans. It is in regional growth and is consistent with the CMP. It is located in a PA-2 Planning Area and the proposed development is consistent with the State Plan’s objectives for PA-2. Moreover the installation of renewable energy facilities on the Landfill advances the stated objectives of New Jersey’s Energy Master Plan and the Department’s Greenhouse Gas Recommendations Report. It is also consistent with every critical energy policy adopted by state and federal governments. A host of recent legislation has been introduced to encourage solar and wind energy on landfills. (See for example A-216 introduced by State Senator Whelan and on the federal side S-3329 Cleanfields Act introduced by Senator Lautenberg).

### **Proposed State Plan.**

The redevelopment of Stafford Park generally and the installation of renewable energy facilities specifically are strongly encouraged by the current draft of the new State Plan. Goal #9 is entitled: “Increase Energy Efficiencies and Reduce Greenhouse Gas Emissions”. The “siting, development, design and use of green building construction materials” is specifically promoted. Stafford Park has accomplished all of these goals. Energy usage has been substantially reduced through the implementation of sustainable building practices and the use of renewable energy already. The construction of renewable energy facilities on the closed and capped landfill will further advance these goals.

In summary, the construction of Stafford Park and the installation of renewable energy facilities on the closed and capped Landfill are entirely consistent with the policies identified in the State Plan and should be encouraged by all agencies of the State of New Jersey.