

Cross Acceptance Response Template

Prepared for the

County of Cumberland

Prepared by

Cumberland County

Department of Planning, Tourism & Community Affairs

Approved by the Cumberland County Planning Board on July 2, 2025.

SECTION 1: CONSISTENCY WITH THE PRELIMINARY STATE PLAN

County Planning Documents

The Cumberland Plan, adopted 1966

- Population Study, vol 1
- Economic Base and Social Environment, vol 2
- Transportation, vol 3
- Land Use- 1964, vol 4
- County Government, vol 5
- Long Range Financial Study, vol 6
- Open Space and Recreation, vol 7
- Special Studies, vol 8
- The Cumberland Plan 1966, vol 9

Feasibility Study for Various Rails to Trails Plan, 2010

Open Space and Recreation Plan, 2011

Bikeways Inventory, 2015

Cumberland County Bicycle and Pedestrian Safety Action Plan, 2017

Economic Development Strategic Plan 2020-2030, 2020

Farmland Preservation Plan, 2023

Bridgeton Southeast Gateway Multi-Modal Community Transportation Analysis, 2023

Cumberland-Salem-Cape May Workforce Development Plan, 2023

Mid-County Park Master Plan, 2024

Maurice River Corridor Study, 2024

Nabb Avenue Feasibility Study, 2024

SJTPO Vulnerability Framework, 2024

Cumberland County Local Road Safety Plan, 2024

Areas of Inconsistency- Goals/Objectives

Equity

Goal: Implement equitable planning practices to promote thriving communities for all New Jerseyans.

Equitable distribution of resources is important to Cumberland County. Cumberland County has a disproportionate number of overburdened communities. While the state has a formula used to designate and support overburdened communities, it is not working. Any formula should use Cumberland County as an example to ensure equitable distribution of benefits.

Based upon the 2023 ACS 5-year estimates, Cumberland County has 16.3% of its population living below the poverty level, which is the highest percentage of population below the poverty level out of the 21 New Jersey Counties. In comparison, the state of New Jersey's overall percentage is 9.8%. Nine counties in the State surpass this statistic, including Cumberland (16.3%), Essex (15.0%), Hudson (14.8%), Passaic (13.7%), Atlantic (13.1%), Salem (12.8%), Camden (12.2%), Mercer (11.1%), and Ocean (10.4%). Any future formula developed by the state should prioritize these counties for support, both technical and financial. The chart below shows the percent of population below the poverty level for each County in New Jersey as well as the State.

	Percent of population below poverty level
Atlantic	13.1%
Bergen	6.7%
Burlington	6.8%
Camden	12.2%
Cape May	8.7%
Cumberland	16.3%
Essex	15.0%
Gloucester	7.6%
Hudson	14.8%
Hunterdon	3.8%
Mercer	11.1%
Middlesex	8.5%
Monmouth	6.4%
Morris	5.1%
Ocean	10.4%
Passaic	13.7%
Salem	12.8%
Somerset	5.5%
Sussex	5.4%
Union	8.9%
Warren	8.1%
<i>New Jersey</i>	<i>9.8%</i>

Source: ACS 2023 5-year estimates table S1701

In analyzing the municipal poverty levels of the municipalities in Cumberland County, eight of the county's 14 municipalities exceed the State's percent of population below the poverty level, with nearly one-third of the Bridgeton population living in poverty (31.7%). The following chart details the percent of population below the poverty level in comparison to both Cumberland County and New Jersey.

	Percent of population below poverty level
Bridgeton	31.7%
Commercial	14.7%
Deerfield	6.4%
Downe	10.0%
Fairfield	8.4%
Greenwich	7.2%
Hopewell	7.5%
Lawrence	10.9%
Maurice River	15.1%
Millville	13.0%
Shiloh	3.5%
Stow Creek	7.8%
Upper Deerfield	19.7%
Vineland	13.9%
Cumberland County	16.3%
New Jersey	9.8%

Source: ACS 2023 5-year estimates table S1701

In addition, the State Plan focuses on environmental justice and public health impacts as a means to achieve Equity. Funding and support by the state is paramount in assisting Cumberland County and its municipalities. As stated in the municipal CARTs, the County is fully supportive of partnerships with colleges and universities (such as Rowan University, Stockton University, Rutgers University, etc.) to study the municipalities and regions of the County in order to create a strategy for long-term benefit as it relates to local planning decisions and public health.

To further the goal of public health, extension of sewer to existing small-lot residential dwellings is a priority for the County. Many of these areas include undersized lots on individual septic systems with individual wells. Many of these areas are identified on the map entitled "Assessment and Inconsistency" map as proposed Planning Area 3: Fringe. These areas include:

- Commercial Township- Port Norris, Mauricetown, Laurel Lake
- Deerfield Township- Rosenhayn
- Downe Township – Dividing Creek, Newport, Money Island
- Fairfield Township – Fairton, Gouldtown
- Greenwich Township- Othello, Greenwich
- Hopewell Township - Roadstown
- Lawrence Township – Cedarville
- Maurice River Township – Port Elizabeth, Dorchester, Leesburg, Heislerville
- City of Millville- Laurel Lake
- Shiloh

Climate Change

Goal: Effectively address the adverse impacts of global climate change

The State Plan has a subgoal of promoting well-managed coastal and riverine corridors. The County is in support of this goal, however State Agencies that own land, such as NJDEP, often neglect the maintenance of properties that are owned.

Further, SJTPO completed the Regional Vulnerability Framework, which analyzes risks from extreme weather and climate hazards in comparison to the region's transportation network. Several resilience strategies have been identified, including roadway elevations, hardening- physical improvements, stormwater management, nature-based solutions, providing defensible space around critical assets, and maintenance, to name a few. The report also includes a summary of grant programs, several of which may no longer be available, such as FEMA BRIC. However, additional assistance is needed to help municipalities and other entities navigate available funding sources for projects.

It's important to note that two municipalities in the County were selected to receive FEMA Direct Technical Assistance (DTA) for the BRIC program. Commercial Township qualified as a Designated Community Disaster Resiliency Zone, which only required a local match of 10% against FEMA's 90% for any selected and funded project. Maurice River Township was the other community selected, which would have required a local match of 25%.

Further, the pending NJDEP REAL legislation will have significant impacts on existing communities as well as proposed development. The proposed elevation requirements are significant compared to existing conditions, as much of the Bayshore Region consists of older dwellings in need of significant investment and revitalization. There should be a funding source available through the state that would allow disadvantaged counties, municipalities, and communities to comply with these regulations. A Home Rehabilitation Program that focuses on home elevations for existing dwellings, that prioritizes underutilized, historic, disadvantaged and underserved communities would be most helpful in this region.

The State Plan also has a subgoal of decarbonization. In efforts to de-carbonize the state, there needs to be efficient, updated, and modernized electric infrastructure that can support emerging technologies and land uses, as well as maintaining existing needs. Emerging technologies, such as data centers, electric vehicle charging stations, and utility-scale solar, should be supported without causing rate increases to local consumers. The State and BPU should work with Atlantic City Electric to ensure that infrastructure can support emerging technologies and power withdraws.

Natural and Water Resources

Goal: Protect, maintain and restore the State's natural and water resources and ecosystems

Cumberland County is bountiful in open spaces which protects, maintains, and restores the State's natural and water resources and ecosystems. Given the numerous Wildlife Management Areas in the County (Buckshutem, Cedarville Ponds, Clarks Pond, Cohansey River, Dix, Egg Island, Fortescue, Gum Tree Corner, Heislerville, Mad Horse Creek, Menantico Ponds, Millville, Nantuxent, New Sweden, Peaslee, and Union Lake), in addition to state-owned and managed preserves (Kings End, Maple Hollow, Panther Branch, Richard Buhlman, Sharps Branch, Shorebirds Environmental Concern, Shorebirds Moores Beach) and State Parks (Belleplain, Stow Creek). However, more resources are needed from the State to better maintain these properties. Cumberland's open space is a tourism generator; the County is home to the East Point Lighthouse, located within the Heislerville WMA. The County also hosts events throughout the year within the Bayshore Region, such as February's Eaglefest, that includes both guided and self-guided tours within the preserved open spaces of the County.

Through the Cross-Acceptance process, the County has received comments from the municipalities related to a lack of maintenance and abundance of litter found in these pristine locations. Some municipalities have even requested that the DEP stop purchasing open space, as there are concerns regarding a lack of ratables and a diminished amount of developable and unconstrained land remaining.

In terms of agriculture, Cumberland County has highly productive soils for farmland production. Farmland is a major economic driver in the County, especially its nursery operations. According to the 2022 Agricultural Census, Cumberland County's market value of products sold made up 20.5% of the entire state's output, or \$305,002,000 of the State's \$1,487.860,000. The County with the second largest market value of product sold was Atlantic County, with 10.1%. The following table shows the Market Value of Products Sold for the State as well as each County.

Market Value of Products Sold (per \$1,000)			Farm Production Expenses (per \$1,000)	
	\$	%	\$	%
New Jersey	\$1,487,751	100.0%	\$1,397,572	100.0%
Atlantic	\$149,860	10.1%	\$125,668	8.4%
Bergen	\$10,610	0.7%	\$8,654	0.6%
Burlington	\$135,225	9.1%	\$135,487	9.1%
Camden	\$34,182	2.3%	\$27,820	1.9%
Cape May	\$17,641	1.2%	\$14,731	1.0%
Cumberland	\$305,002	20.5%	\$265,540	17.8%
Essex	\$4,169	0.3%	\$3,967	0.3%
Gloucester	\$136,583	9.2%	\$100,276	6.7%
Hudson	\$10	0.0%	\$15	0.0%
Hunterdon	\$115,193	7.7%	\$130,020	8.7%
Mercer	\$27,758	1.9%	\$28,663	1.9%
Middlesex	\$42,613	2.9%	\$37,170	2.5%
Monmouth	\$119,532	8.0%	\$131,701	8.9%
Morris	\$33,927	2.3%	\$51,009	3.4%
Ocean	\$30,905	2.1%	\$26,002	1.7%
Passaic	\$4,683	0.3%	\$5,283	0.4%
Salem	\$138,080	9.3%	\$124,630	8.4%
Somerset	\$23,239	1.6%	\$29,271	2.0%
Sussex	\$30,966	2.1%	\$38,978	2.6%
Union	\$315	0.0%	\$850	0.1%
Warren	\$128,259	8.6%	\$111,837	7.5%

Source: 2022 Census of Agriculture, Table 2 & Table 3

It should be noted that other factors, such as farm production expenses, may have led to this increase in the market value. However, when compared to the other counties, farm production expenses mirror a similar trend to that of the market value of products sold.

Cumberland County has an active farmland preservation program and has a successful relationship with the State Agriculture Development Committee.

The State Plan's subgoal for Air Quality relies heavily on converting to electric vehicle fleets, micro-mobility uses, and public transportation. The County has very limited electric vehicle charging spaces and infrastructure available for public use. There is also limited public transportation service in the County; the only public transportation in Cumberland County are several bus lines which primarily run along state highways between Atlantic City, Millville, Vineland, Bridgeton, and north towards Camden. Expansion of transit in Cumberland County, and smaller-scale public transportation throughout the County should be studied to determine its feasibility.

The Water Quality subgoal of the State Plan relies heavily on natural solutions, watershed-based planning, stormwater management, contamination, flooding, and restoring vegetated streams. However, there is limited information related to the implementation of these goals. The NJDEP recently revised its stormwater management rules, and there are additional changes pending via the NJDEP REAL regulations, which will have additional impacts on coastal and inland floodplains. As iterated in the Climate Change section of this report, funding and support from state agencies is needed to ensure compliance. There should also be some sort of credit or "rebate" given to municipalities for the vast acreage of NJDEP-owned and maintained lands which provide these services.

[Pollution and Environmental Clean Up](#)

Goal: Protect the environment, prevent and clean up pollution.

The first Subgoal of "Protect the environment, prevent and clean up pollution" is concerning Brownfields and Lead. Many municipalities in the County are compliant with the State's lead abatement program concerning lead paint in apartment buildings. However, many of these strategies related to brownfields are best handled by individual municipalities, given New Jersey's home rule status. Unless a brownfield is within County ownership and/or control, many of these objectives are not relevant to the County.

It is important to note that there are many Brownfields in the County, several of which are working with state agencies to develop a strategy for remediation, revitalization, and reuse. Most common are former landfills that are in the process of being closed, with many municipalities proposing to reuse as large-scale solar sites.

The second subgoal is concerning Waste Management and Recycling. All of Cumberland County and its municipalities utilize The Authority (previously named The Cumberland County Improvement Authority) for waste management and recycling. The Authority manages the solid waste complex, recycling program, and clean communities program.

[Public Facilities/Infrastructure](#)

Goal: Economic Opportunity through Nation Leading Infrastructure

Public Transportation

Public transportation is provided primarily by NJTransit's bus service. There are no train transportation services currently provided in Cumberland County. Bus service in Cumberland County is a critical economic development driver, and due to dispersed development throughout the county, bus service often provides access to basic services. Cumberland County exhibits relatively lower household income, lower automobile ownership and utilization rates, and lower average driver's license possession rates all of which are attributes that indicate high bus service need.

There are currently four NJTransit bus routes through Cumberland County (Route 553, 408, 410, and 313). While these routes capture many neighborhoods in Bridgeton, Vineland and Millville, these routes completely miss any communities in Commercial Township, Deerfield Township, Downe Township, Greenwich Township, Hopewell Township, Lawrence Township, Shiloh Borough, and Stow Creek Township – this constitutes over 50% of all of the

municipalities in Cumberland County as not serviced by NJTransit. Many of the stops in more rural areas are unscheduled, creating even greater inconsistency in arrival and departure schedules from scheduled stops, which are already rather inconsistent.

Post COVID, the County of Cumberland assessed scheduled stop locations along the existing bus routes and found that most provide no amenities – no seating, no inclement weather coverage, no trash bins, and no handicapped curb cuts or access to sidewalks. The image provided shows a prime example, stop #16932 on bus route 553, located in Upper Deerfield Township at the intersection of two State roadways, Route 77 and Route 49. In this example, shopping carts from abutting businesses are being used as seating. It is also seriously questionable how someone in a wheelchair arriving by bus would even functionally maneuver off of the concrete pad. While meetings were held with representatives from NJTransit at the time and this data was provided, no known corrective action has been taken. Amenity investments by NJTransit throughout Cumberland County are sorely needed, especially given that many of these bus routes traverse already Overburdened communities and neighborhoods.



Road Raising

When it comes to vehicular traffic, one of the greatest needs in Cumberland County relates to the numerous historic communities located along the Delaware Bayshore. The historic oystering villages, shipbuilding communities and historic crossroads that have existed in many cases for over 250 years, are facing an access problem due to flooding of existing roadways. In most cases, this issue can be resolved by raising the road surface of a handful of roads, a task that is both feasible and warranted to ensure the safety and prosperity of these long-existing communities. The deterrent to this reasonable solution is self-made through NJDEP statutory restrictions. Standards dictate that when a road surface is raised, the road embankment must consequently be widened. In many cases throughout the Bayshore, county roads are abutted on both sides by lands owned by NJDEP as open space. The minimal widening of the road embankment results in the triggering of several permit requirements and onerous obligations. In these specific situations the extremely limited environmental impact caused by embankment widening and the resultant arrest of further consideration at the state level fundamentally implies a singular recourse – the depopulation and abandonment of these historic communities and neighborhoods along the Bayshore. To Cumberland County, such a result is unfathomable, and it is recommended that serious discussion progress towards state support of limited road height elevation.

Electrical Transmission Infrastructure

Other than the City of Vineland which is serviced by a municipal-run electric utility, the entirety of Cumberland County is serviced by Atlantic City Electric. During the state-led promotion of solar energy, Atlantic City Electric identified large swathes of Cumberland County as not viable for investment due to the lack of high-voltage transmission lines. Due to years of inconsistent and nontransparent transmission improvement scheduling and real-time operating practices, accurate predictions of infrastructure availability has proven difficult to impossible. This situation is exacerbated by the development of data centers, which are growing economic development drivers. For renewable energy investment and electric/energy-intensive development there is an immediate need in transmission system investments.

Sewer Service Areas

While this topic has been discussed in multiple other areas of this report, the fundamental issue is that the most recent Wastewater Management Plan was provided by Cumberland County to NJDEP in 2019 with no response over the ensuing six years other than acknowledgment of receipt. This has resulted in a document which now is largely outdated and requires revision to address the significant economic development that has occurred over the last few years. Sewer is recognized as an environmental protection tool, to sustainably treat and otherwise manage wastewater responsibly. Sewer service as opposed to septic systems is a publicly managed enterprise open to oversight and public scrutiny. Septic is often reliant on private investment without the ability to effectively ensure compliance. Given this, the State should be generally supportive of sewer service expansion; however, given the lack of responsiveness over the last six years and the known extensive delays with various Site-Specific Amendment requests made in Cumberland County, the general State policy on wastewater management falls into question. The State Development and Redevelopment Plan should provide guidance to State agencies by supporting sewer expansion within Fringe, Suburban and Urban areas as well as designated Centers.

Housing

Goal: Provide an adequate supply of housing for residents of all ages and incomes in communities of their choosing that meet their needs and offer ready access to the full range of supportive goods and services

Cumberland County is supportive of this goal, however, given the County’s infrastructure limitations (ie. public water and public sewer), it is difficult to provide a variety of housing types for residents of all ages and incomes when individual subsurface sewage disposal systems and private wells are the only infrastructure available to a municipality. Expanding existing sewer service areas is an extensive process; Cumberland County initially submitted an amended Wastewater Management Plan to NJDEP on October 31, 2018, and following a series of conversations and comments made by NJDEP, an amended plan was submitted in August 2019. Nearly six years later, the Plan has not received NJDEP approval. Since this submittal, there have been discussions about extending the sewer service to other locations in the County that are not included in the current plan pending approval. Further, Site Specific Water Quality Plan Amendments have also taken years for NJDEP to approve. Changes should be made to the statute that requires State Agency approval within an allotted and reasonable timeframe to prevent plans from becoming outdated and stagnant while awaiting State Agency approval.

Much of the County’s housing stock was built prior to 1980 (68%), with nearly 25% of all structures built prior to 1950. The chart below details the year of structures built in Cumberland County.

While the State provides funding to assist with the creation of affordable housing through the State Affordable Housing Trust Fund, there is limited support with respect to state assistance with the rehabilitation of older housing stock for moderate- and low-income households.

Year Structure Built		
Year Built	Cumberland County	
	#	%
Total	57,203	100%
Built 2020 or later	173	0.3%
Built 2010 to 2019	2,142	3.7%
Built 2000 to 2009	5,744	10.0%
Built 1990 to 1999	4,841	8.5%
Built 1980 to 1989	5,452	9.5%
Built 1970 to 1979	9,023	15.8%
Built 1960 to 1969	7,385	12.9%
Built 1950 to 1959	8,937	15.6%
Built 1940 to 1949	4,075	7.1%
Built 1939 or earlier	9,431	16.5%

Source: ACS 2023 5-year estimates

The State Plan includes a subgoal related to housing and transportation. This subgoal is primarily focused on locations where there is a train station, allowing a municipality to provide a Transit-Oriented- Development. There are no train stations in Cumberland County. However, there needs

to be better coordination with NJ Transit, other state agencies, and the County to proactively provide additional transit to facilities and amenities in relation to the workforce.

It should be noted that only 50% of the Counties’ municipalities are participating in the Fourth Round of Affordable Housing. Communities not participating have cited the lack of resources and infrastructure for the reasoning behind not participating. Complying with the ever-evolving affordable housing obligation is an expense that many of the municipalities cannot afford.

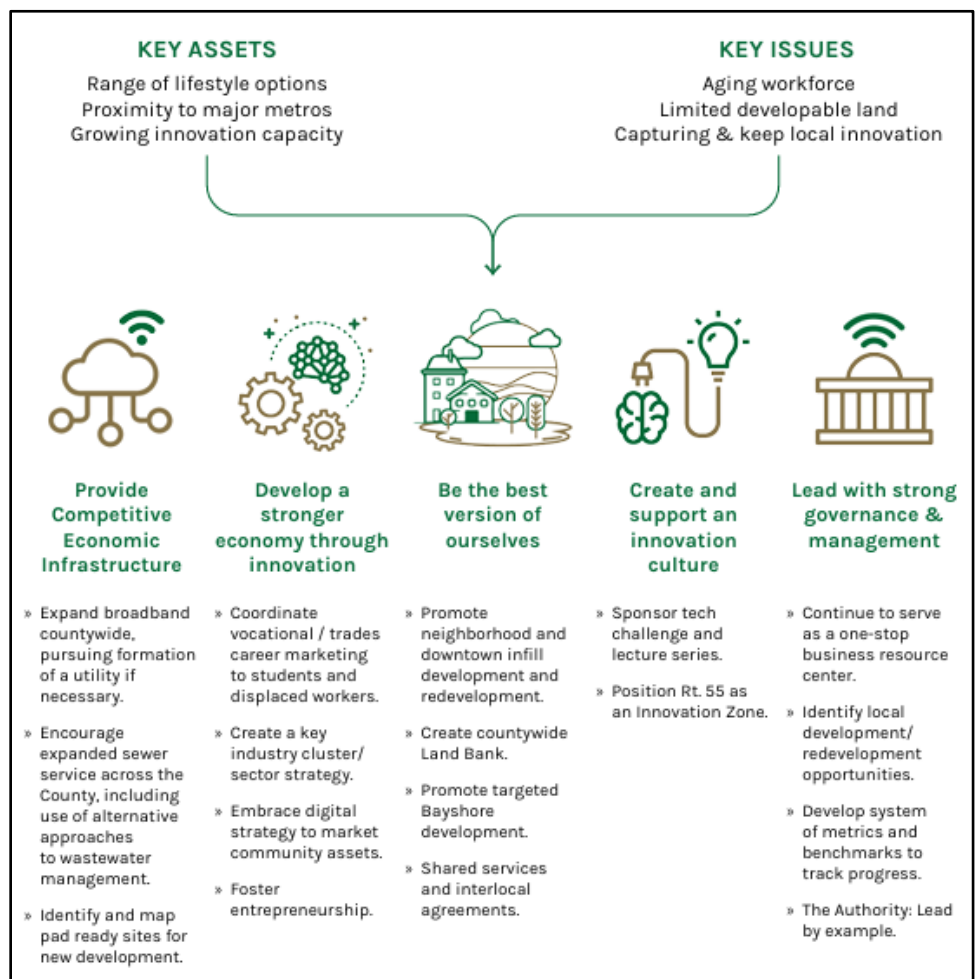
Economic Development

Goal: Promote economic growth that benefits all residents of New Jersey

Economic Development is extremely important to Cumberland County. The removal of land as a result of permanent land preservation is significant. Over 118,000 acres of the County is permanently preserved; 21,698 acres of permanently preserved farmland and 97,064 acres of permanently preserved open space. This acreage is significant and makes up nearly 40% of the County’s tax base.

The Authority, formerly known as the Cumberland County Improvement Authority, was designated as the county’s economic development and redevelopment agency in 2015. The Authority manages the Economic Development website¹ that includes information about the County, small business support, workforce development, education and training services, available sites for development, and resources and data.

The Authority prepared the Strategic Economic Development Plan² for 2020-2030. The Plan takes into consideration the history of manufacturing, farming and food, textile and glass production, while enforcing the importance of innovation, entrepreneurialism and technology in the future. The Plan analyzes economic trends including workforce, business growth, commuting, industries, and employment. It analyzes the conditions of infrastructure, such as broadband access and cellular service, development patterns (ie. urban versus rural) and identifies development opportunities based upon regulatory frameworks (ie. CAFRA and Pinelands). A series of recommendations were created to implement the plan. The image to the right details those recommendations.



¹ <https://theauthoritynj.com/why-cumberland/>

² <https://theauthoritynj.com/wp-content/uploads/2021/03/The-Authority-Strategic-PlanFull-Report.pdf>

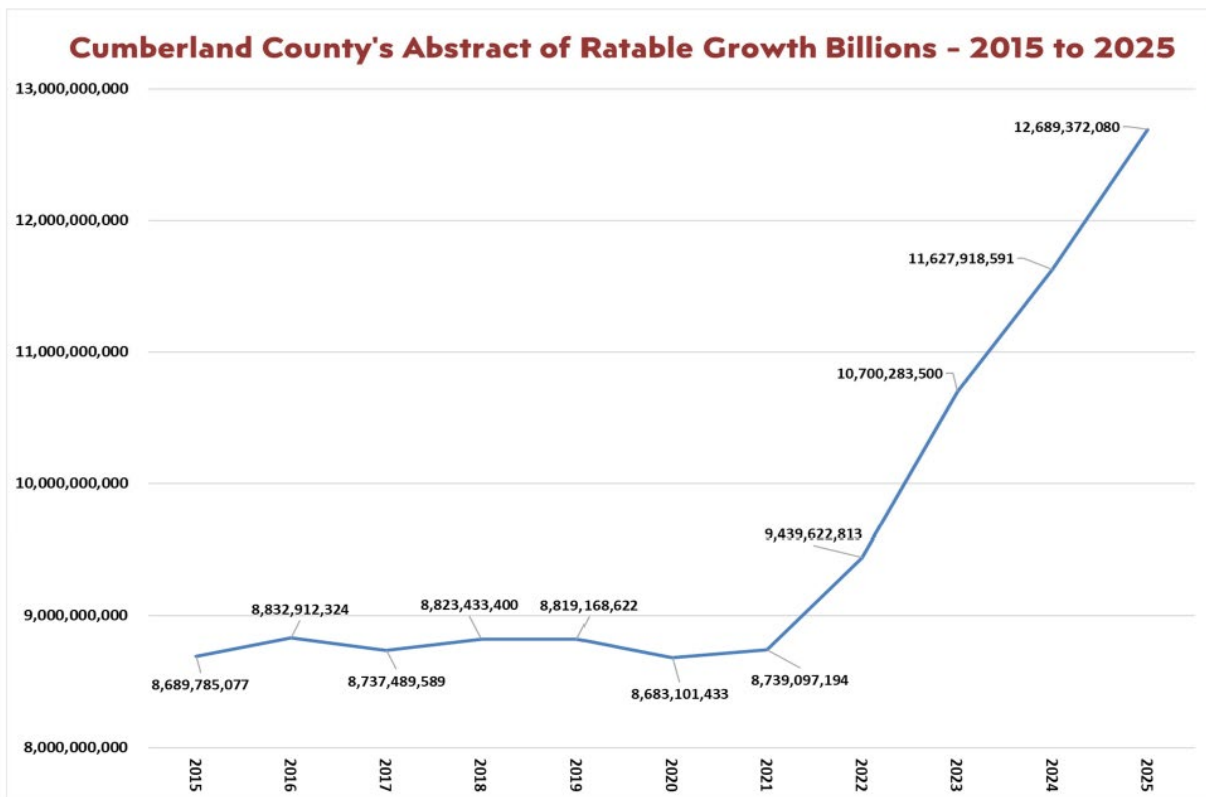
In addition to efforts made by The Authority, municipal initiatives, such as Redevelopment Areas, have also contributed positively to the local economy. Municipalities that have experienced success in pursuing redevelopment initiatives include Upper Deerfield, Vineland, Millville and Bridgeton.

There are four active Chambers of Commerce in the County- Bridgeton Area Chamber, Chamber by the Bay, Greater Millville Chamber, and Greater Vineland Chamber. The Chambers are membership based and provide networking opportunities and promote education and communication.

Cumberland participates in the Cumberland Salem Cape May Workforce Development Board, which coordinates One-Stop services among all three counties. The services highlighted on the Workforce Development website are supported by the NJDOL with funds from the USDOL through the Workforce Innovation and Opportunity Act. The board provides oversight and support to various workforce and business development related grants and programs operated through the One Stop Career Center System. The board is comprised of twenty-eight members representing business, industry, local government and service organizations.

There are five standing committees that address the workforce challenges in the following areas: Business and Industry, Adult Education and Literacy, Disabilities, Youth Council, and Planning and Oversight.

Given the efforts made by the County, each year since 2021, the County’s abstract of ratable growth has significantly increased. As shown in the image below, between 2021 and 2025, the County’s ratables have increased between \$700 million and \$1.2 billion each year. Between 2021 and 2025, the County experienced over 30% ratable growth.



Maritime facilities and services are critical for the County. Given the significant maritime history along the Delaware Bay, Maurice River, and Cohansey River, assistance is needed to permit and promote economic development. While the State Plan includes goals and objectives related to investment and maintenance of maritime facilities and

services, the County finds that maritime facilities often require more support as they conflict with environmental regulations.

The County is supportive of environmental sustainability- however, environmental sustainability often conflicts with reasonable development. This issue is particularly true within the Bayshore Region as it relates to maritime uses and facilities and natural features, such as riparian areas, flood zones, wetlands buffer areas, stormwater management, Coastal Zone Management Rules, and the pending REAL legislation.

Archeological, Historic, Cultural, Scenic, Open Space and Recreation

Goal: Protect, enhance, and improve access to areas with exception archeological, historic, cultural, scenic, open space and recreational value.

Cumberland County is home to not only the largest State and National-designated historic district in New Jersey, but also the singular colonial tea burning location within the State. From the village of Greenwich, founded in 1685 and exhibiting many of the community attributes and landscapes of its early period, to architectural examples from the Modern and Postmodern periods, including designs by William Lescaze and Robert Venturi, Cumberland County's historic architecture has been preserved largely through the lack of more recent development. However, development interest is dramatically increasing within the county, and it will be important for State resources directed to the preservation and interpretation of historic communities to be directed to the county more so than in the past.

While Cumberland County is the fifth highest recipient of Local Arts Programming (LAP) funds from the N.J. State Council on the Arts, it falls significantly behind in N.J. Historical Commission funding. The high level of LAP support is due to a strong and vibrant artists community and a state-level mandate of ensuring at least 25% of all arts funding be directed to South Jersey. It is recommended that a similar minimum standard be implemented on the history side, particularly given the distinct vernacular of architectural types in the region.

Cumberland County is home to numerous state-operated Wildlife Management Areas along with dozens of non-profit-owned parks and properties. Combined with significant municipal parklands, there are tens of thousands of acres permanently preserved throughout Cumberland County. In fact, at latest calculation close to half of the county's entire landmass is permanently preserved open space. This is a tremendous success and an achievement to be lauded; however, two distinct challenges have arisen that must be addressed through the State Development and Redevelopment Plan.

First, in some municipalities, over 80% of the entirety of the land area is held by the State as open space, severely reducing the tax base on which the municipalities rely for maintaining a functioning government. Consequently, amenities and basic services for residents are either lacking or non-existent in some locations throughout Cumberland County. While legislative efforts such as PILOT funding can sometimes provide stop-gap assistance, a more permanent solution can be made by designating remaining undeveloped upland areas as appropriate for future development. Any municipality exceeding 80% permanently preserved should be considered to have more than met its contribution for environmental protection and any remaining properties available should receive prioritization by the State for development. This issue becomes one of environmental justice and equity. Typically, this terminology references cases in which neighborhoods are devoid of open spaces, but in Cumberland's case, it refers to the opposite – neighborhoods and communities where so much land is preserved and protected that it makes it difficult for residents to receive even the most basic of sustainable life. Additionally, with degrading infrastructure and the inability of local government to be able to afford basic services, the cost of living becomes untenable. Most communities that fall into this situation are at or near the poverty level, which makes equity and justice concerns that much more apparent.

Examples of policies or goals which could ameliorate this injustice and inequity include, prioritization of development-related grant funds and infrastructure grant support to municipalities with high percentages of state-owned lands; reductions in environmental constraints for future development in these communities; and improved support of eco-tourism initiatives within these communities.

The topic of eco-tourism leads to the second challenge faced in these communities. While huge acreages have been acquired as open space, in many cases little to no investment has been made in passive recreational amenities. In many cases, Wildlife Management Areas lack well-maintained trails, interpretive or directional signage, trailhead parking, restroom facilities, observation towers or other recreational improvements that would attract use of the properties by the public. In fact, in some cases, state-owned land is actively closed to the public due to the lack of proper maintenance. The result is that local residents cannot enjoy the public lands and sustainable economic development opportunities are lost due to the inability of these public resources to attract tourism. This situation creates a sense of animosity between local residents and community leaders and NJDEP and other open space land stewards. This does not have to be the case. Stewards need to provide STEWARDSHIP – relatively limited investments in these properties could dramatically improve the benefits they provide to local communities. Such investments would be most effective and beneficial if it is coordinated with local governments. Strong partnerships could form through this effort, with residents and communities taking pride in these investments and acting as local eyes and ears to help protect and maintain lawful usage of the properties.

In almost all examples within the State Development and Redevelopment Plan, inequity and injustice as it relates to environmentalism and open space references highly developed neighborhoods with inadequate open space opportunities. The Plan needs to also identify the growing inequity and injustice found in communities with so much preserved open space that basic livability is being called into question.

Revitalization

Goal: Revitalize and recenter the State's Underutilized Developed Areas

That State Plan includes subgoals of revitalizing older centers and recentering underutilized developed areas. Within Cumberland County, there are existing and historic population centers that are well established and historically significant. These areas are not identified in the State Plan. These existing smaller scale villages and hamlets are at a crossroads- NJ DEP infrastructure regulations do not support these existing and historic patterns of development. Such communities have been identified on the maps as being relocated from PA5, PA4B or PA4 to PA3: Fringe, as permitting and incentivizing investment in these communities with infrastructure would not only improve public health (ie. undersized lots with septic and well), but also act as a catalyst for economic development, reinvestment and revitalization. These smaller scale centers include Port Norris, Mauricetown, Dividing Creek, Newport, Greenwich, Fairton, Laurel Lake, Leesburg, Delmont, Port Elizabeth, Cedarville, Roadstown, Rosenhayn, and Dorchester, Bivalve, and Bricksboro. All population centers- regardless of size- need to be recognized by State Agencies.

Sound and Integrated Planning

Goal: Foster sound and integrated planning and implementation at all levels statewide

The State Agencies need to better balance with one another. Much of Cumberland County, and more specifically the Bayshore Region, lies within NJDEP and CAFRA jurisdiction. In conducting outreach to our municipalities that had recently achieved Plan Endorsement, there was much discussion about NJDEP mandating a reduction in the size of center boundaries given the ecological significance of that area. NJDEP failed to take notice of a sustainable balance of land development within the Center. Further, the State's environmental regulations and purchase of open space threaten the livability of communities, which render much of the Bayshore "unhabitable" and "non-developable."

Should NJDEP restrictions continue to remain stringent, there needs to be some form of equity given to those impacted communities.

In addition, the eastern edge of the County falls within boundaries of the New Jersey Pinelands Commission, and additional lands lie within the federally designated Pinelands National Reserve, impacting the City of Vineland and the Township of Maurice River.

It is also important to note that much of the Atlantic City workforce lives in Cumberland County, rather than within the limits of the Investment Zone for the Casino Reinvestment Development Authority. However, Cumberland County is outside of the limits of the Investment Zone for CRDA. Funding should be provided to portions of the County that support the CRDA.

Planning Area Assessment

The County conducted an assessment of the Planning Areas of the 2003 State Plan in relation to the local zoning policies of each municipality. Each municipal CART includes an assessment and recommendations for those specific Planning Area changes.

Given the rural nature of Cumberland County, there are limited utilities and infrastructure, such as sewer service which is often a requirement for higher density housing. The existing Sewer Service Areas are predominately located within the County's three cities- Vineland, Bridgeton and Millville- and within municipalities adjacent to the cities. The majority of the existing sewer service area are located in PA1: Metropolitan and PA2: Suburban. Areas that have sewer service and are located in other Planning Areas (such as PA4: Rural), should be reassigned to PA1 or PA2, depending upon local conditions.

In addition, there are other areas of the County that are located in PA4: Rural or PA5: Environmentally Sensitive, but are existing nonconforming as small lot residential development, given the historic settlement patterns of the County. These areas include the communities of Port Norris, Mauricetown, Dividing Creek, Newport, Greenwich, Fairton, Laurel Lake, Leesburg, Delmont, Port Elizabeth, Cedarville, Roadstown, Rosenhayn, and Dorchester, to name a few. These areas of existing small lot development should be acknowledged in the State Plan as areas in need of investment, including access to infrastructure such as sewer, water, and high-speed internet and should be designated at PA3: Fringe.

In addition, several municipalities participated in the Plan Endorsement Process and received CAFRA Coastal Center and Node Designation. It is recommended that Plan Endorsed Centers be located in a Planning Area that suits those needs. For example, the Centers and Nodes in Maurice River and Commercial Townships should have an underlying Planning Area designation as PA3 Fringe. Further, once a Center or Node is recognized by the State, Centers should not expire once designated.

Further, all state-owned land in Cumberland County should be reassigned to PA8: State-Owned Land. The County also recommends that PA8 reassign its name from State Parks and Open Space to State-Owned Land, as there are several NJDEP-owned properties that are leased to private entities for farming and are therefore not publicly accessible.

SECTION 2: AGREEMENTS AND DISAGREEMENTS WITH THE PRELIMINARY STATE PLAN

Issues/Recommendations to Meet Local Needs

- **Lack of Flexibility for Local Implementation-** Rural communities face different challenges than those in the more urbanized areas. Specifically, PA4 and PA5 should encourage low density rural communities with the supportive infrastructure to maintain reasonable and modern living conditions. Only PA8 should be prohibitive of development.
- **Insufficient attention to agricultural and resource-based economies-** Agricultural and resource based economic development needs to be incorporated into the State Plan as a means to balance the preservation with economic development. Amenities such as bathrooms, water fountains, and small-scale restaurants for tourists looking to spend a day in nature and remote areas require infrastructure. There are many regulatory barriers prohibiting complimentary uses from opening that support eco-tourism and agri-tourism. Future revisions to the state plan and implementation of the state plan should incorporate these revisions.
- **Transportation and Infrastructure Gaps-** Rural counties face persistent challenges related to infrastructure maintenance, limited public transportation, and aging utility systems. However, the Preliminary Plan highlights transit-oriented-development (TOD) and other transportation issues already served by mass transit, rather than acknowledging issues faced outside of train lines. The infrastructure investment framework should include rural transportation corridors, bridge repair programs, and innovative rural mobility solutions (e.g., micro transit, demand-responsive services, etc.). There should also be a discussion related to rural broadband and cellphone coverage as critical infrastructure priorities.
- **Conflicting goals between NJ Preliminary State Plan and Municipal Affordable Housing Obligations-** The affordable housing mandate bestowed upon municipalities directly conflicts with the Planning Areas that are geared to protection, which includes PA4B: Rural Environmentally Sensitive and PA5: Environmentally Sensitive. However, these Planning Area designations often conflict with the wants and needs of municipalities. Affordable Housing, while a contentious issue in certain locations, needs to be analyzed so that the rural communities aren't forced to rezone areas that are not appropriate for growth, while also allowing them to provide opportunity for growth, should that seek that.
- **Plan Endorsement Process-** Pursuing Plan Endorsement through the New Jersey State Planning Commission requires a substantial commitment from local governments in terms of staff time and financial investment. For many municipalities, particularly those in rural or economically constrained areas, these requirements are often too burdensome. Further, communities that require CAFRA Center approval are often required to reduce their center boundaries at NJDEP's discretion. As a result, participation in the Plan Endorsement process remains disproportionately low among rural communities and further contributes to regional disparities. Without revisions to the Plan Endorsement process, advancing statewide planning objectives in rural regions remains unobtainable. A potential recommendation is to empower counties to lead the effort and coordinate with their municipalities.
- **Cross Acceptance Process-** A significant challenge in participating as the Negotiating Entity for the current State Plan update has been the compressed timeframe imposed by the State Planning Commission. The Plan, initially proposed to be released in May 2024, was delayed until its release in December 2024. As a means to meet the Cross Acceptance deadline over a five-month period, the County worked closely with the Office of Planning Advocacy (OPA) and its fourteen constituent municipalities. In order to solicit thoughtful input for the County's CART, OPA assigned an intern to Cumberland County to put together a color-coded chart for each municipality based upon their planning documents and land development/zoning ordinances. This chart is included within each of the municipal CARTs. County staff, specifically the County Planning Director and Assistant Planning Director, reviewed these charts and created a municipal report to accompany each chart. In addition, County staff also created a map

series for each municipality. Part of the mapping process entailed the creation of a county-wide zoning layer which was used to establish local planning policy in comparison to the existing State Planning Areas. Once the Draft Municipal CART was completed, the draft was sent to the municipality's Cross Acceptance subcommittee for review and comment. Once the Subcommittee vetted the report, the Planning Director and/or Assistant Planning Director attended each municipality's Planning Board meeting to ensure that the document represented local planning policy and values. Additional edits were made throughout the process. The following chart details the subcommittee and Planning Board meetings held with each municipality in the County:

Municipality	Subcommittee Meeting	Planning Board Meeting
Bridgeton	-	Wednesday 5/14 at 6:30
Commercial	-	Wednesday 4/23
Deerfield	Received comments	Wednesday 5/14
Downe	-	Tuesday 5/13
Fairfield	5/7/2025	-
Greenwich	-	Monday 5/5 at 7 pm
Hopewell	4/11/2025	Wednesday 4/16 at 7 pm
Lawrence	-	Monday 4/7 at 7 pm
Maurice River	4/3/2025	Wednesday 5/7 at 7 pm
Millville	-	Monday 5/12 - Monday 6/9
Shiloh	-	Tuesday 4/22 7:30 pm
Stow Creek	5/13/2025	Tuesday 5/20 at 7 pm
Upper Deerfield	4/16/2025	Monday 4/21
Vineland	5/13/2025	Wednesday 5/14 at 8:30/9 pm

The County Planning Board approved thirteen of the municipality's CARTs at their June 4, 2025 meeting, and approved the remaining municipality and the County CART at their July 2, 2025 meeting.

Changes to be Implemented Locally to Align with Draft Plan

- Incorporate State Plan and identified inconsistency areas into local Master Plans

Comments/Recommendations for State Agency Implementation

- Reasonable timeframe limitations for permits and plans, especially Wastewater Management Plans.
- Fiscal balance is paramount to a successful plan. As more land is preserved, the cumulative fiscal impact of preservation is more pronounced. Core services, such as public safety, road maintenance, education, emergency services, and infrastructure improvements must continue to be funded, but with fewer taxable parcels contributing to the revenue stream, creating fiscal imbalance. This is especially noticeable in communities with low population densities and limited commercial or industrial activities. Without mechanics to compensate for this revenue loss, such as state payment programs, targeted economic development strategies, or other incentives, the high rate of permanent preservation strains local government finances and threatens long-term fiscal sustainability. This is especially problematic for Cumberland, which has approximately 38.8% of its land base permanently preserved.

Areas Identified for Protection and Areas Identified where Sprawl should be limited or prevented?

Areas shown as PA4: Rural, PA4B: Rural Environmentally Sensitive, and PA5: Environmentally Sensitive are areas identified for limited development. Portions of these areas should be identified for farmland preservation. As discussed in this document as well as in the municipal CARTs, many of the County's municipalities, especially those along the County's coastline, oppose additional open space preservation by the State.

Areas Identified that are Vulnerable to Flooding

SJTPO recently completed an assessment of climate hazards and its impact on the region's transportation network in 2024. The Regional Vulnerability Framework analyzes risks from extreme weather and provides resiliency strategies. The report is posted on the SJTPO website³.

In addition, FEMA in coordination with NJDEP retained Michael Baker International to conduct outreach related to the Base Level Engineering study that is being completed for the Cohansey-Maurice Watershed, which will involve Hydrologic and Hydraulic Modeling to better identify flood risk. The Cohansey-Maurice Watershed occupies the majority of Cumberland County.

Open Space Plan/Open Space Tax

Cumberland County adopted an Open Space Plan in 2011. The County has an Open Space/Farmland Preservation Trust Fund. Funds are created through a County open space tax which was established via voter referendum.

Cumberland County has an Open Space Trust Fund that can be used for the acquisition of open space (fee-simple purchases) and development easements in accordance with farmland preservation rules and regulations.

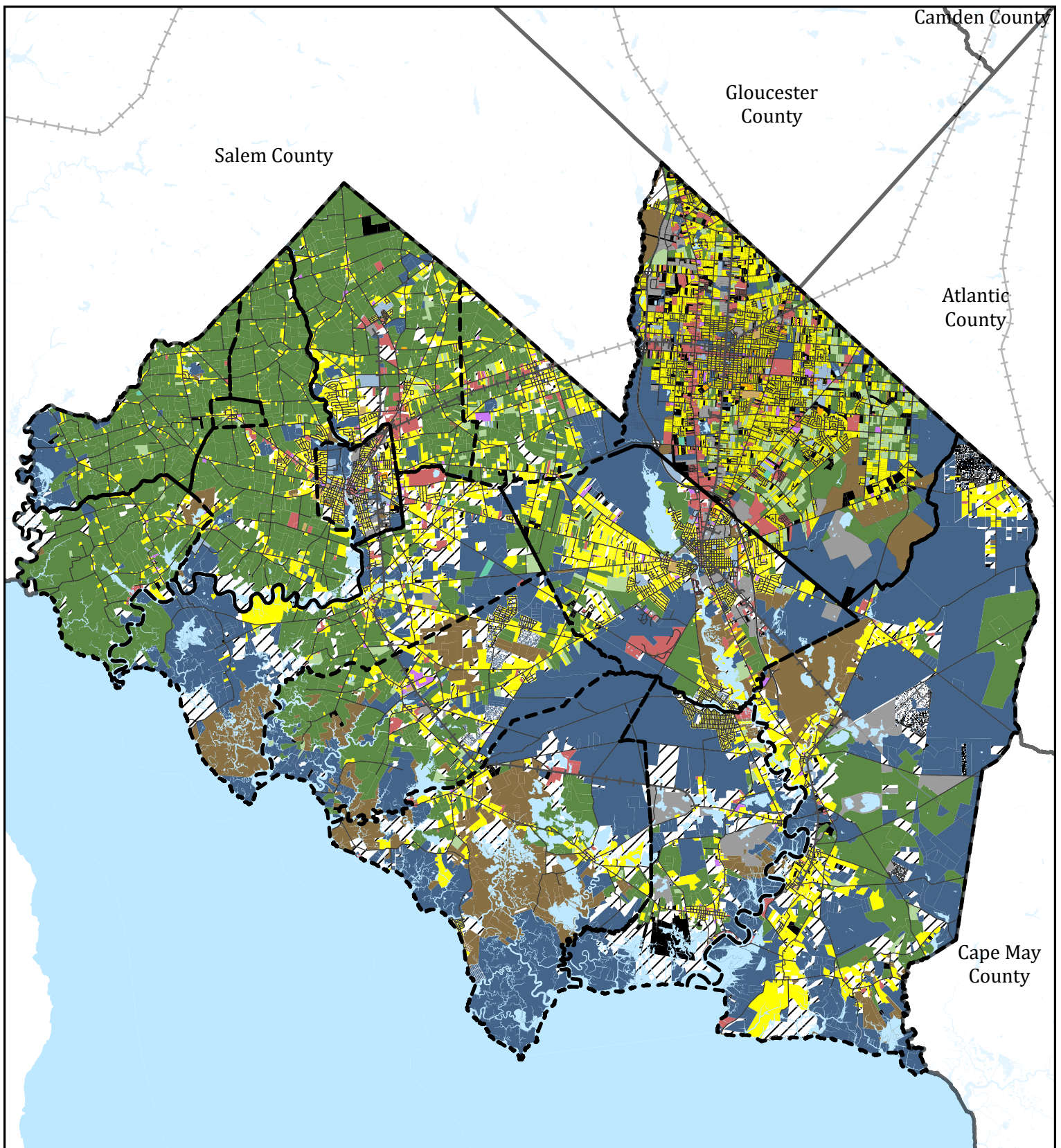
Sustainable Jersey Participation / Environmental Commission

Cumberland County does not participate in the Sustainable Jersey program.

Three Most Important Local and Regional Land Use Planning Goals and Priorities

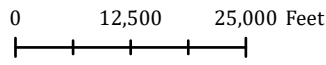
- Sewer service extension to support economic development and housing, especially within the Bayshore Region.
- The County is seeking to create and invest in a county-wide park system with appropriate amenities
- Balance and enhance access to agricultural lands and preserved open space, while allowing development.
- Enhancing agricultural and rural communities in an effort to maintain New Jersey's motto as the Garden State.

³ <https://sjtpo.org/wp-content/uploads/2024/06/Regional-Vulnerability-Framework.pdf>



Existing Land Use

Cumberland County



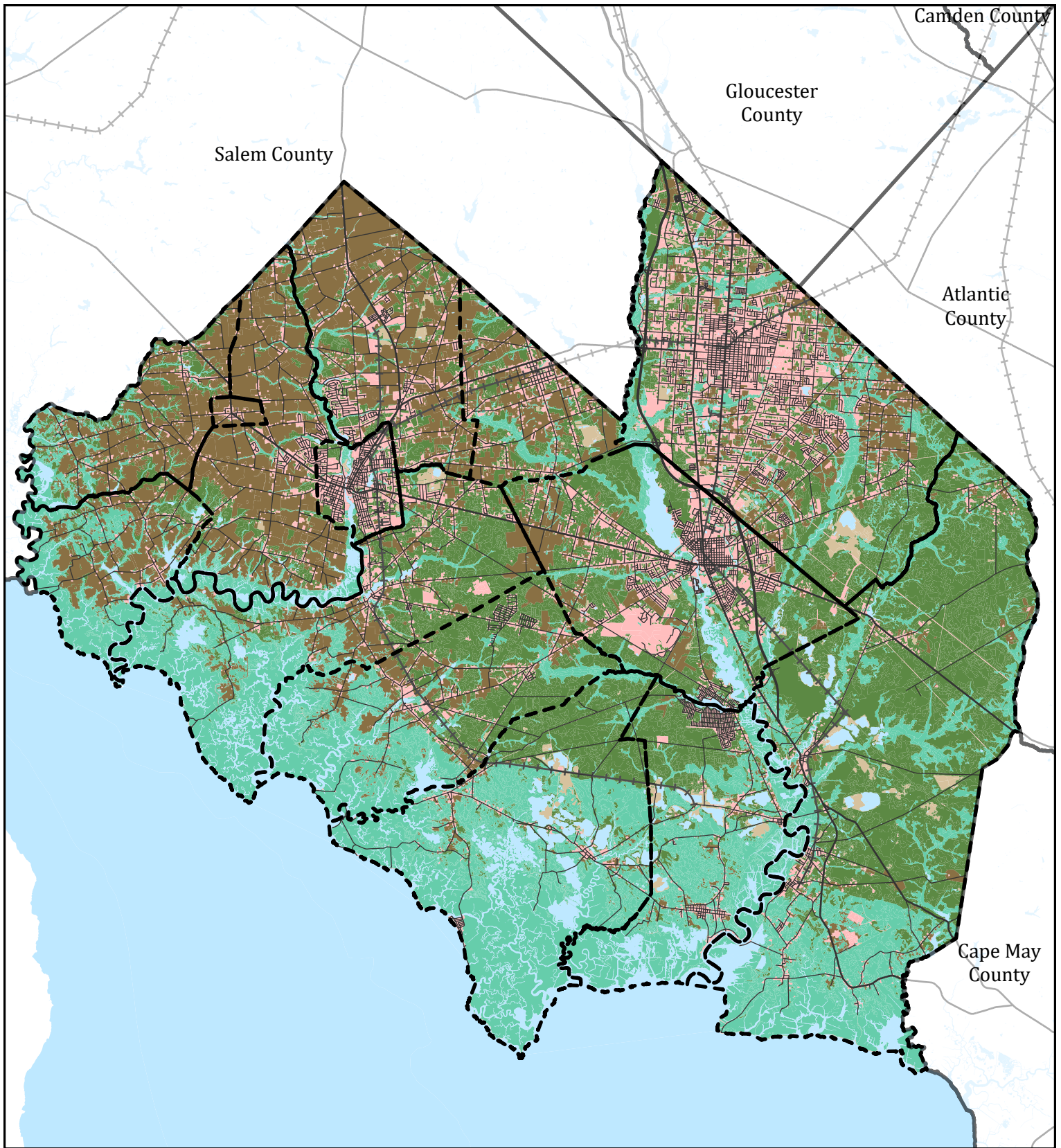
Source: Cumberland County GIS, County Tax Assessment Records, NJDEP, NJOGIS, NJOIT
June 2025

Existing Land Use (2025)

- Vacant
- Residential
- Farmland (Regular)
- Farmland (Qualified)

- Commercial
- Industrial
- Apartment
- Railroad
- Public School
- Private School

- Public Property
- Church & Charity
- Cemeteries & Graveyards
- Other Exempt
- Unknown



2020 Land Use Land Cover

Cumberland County

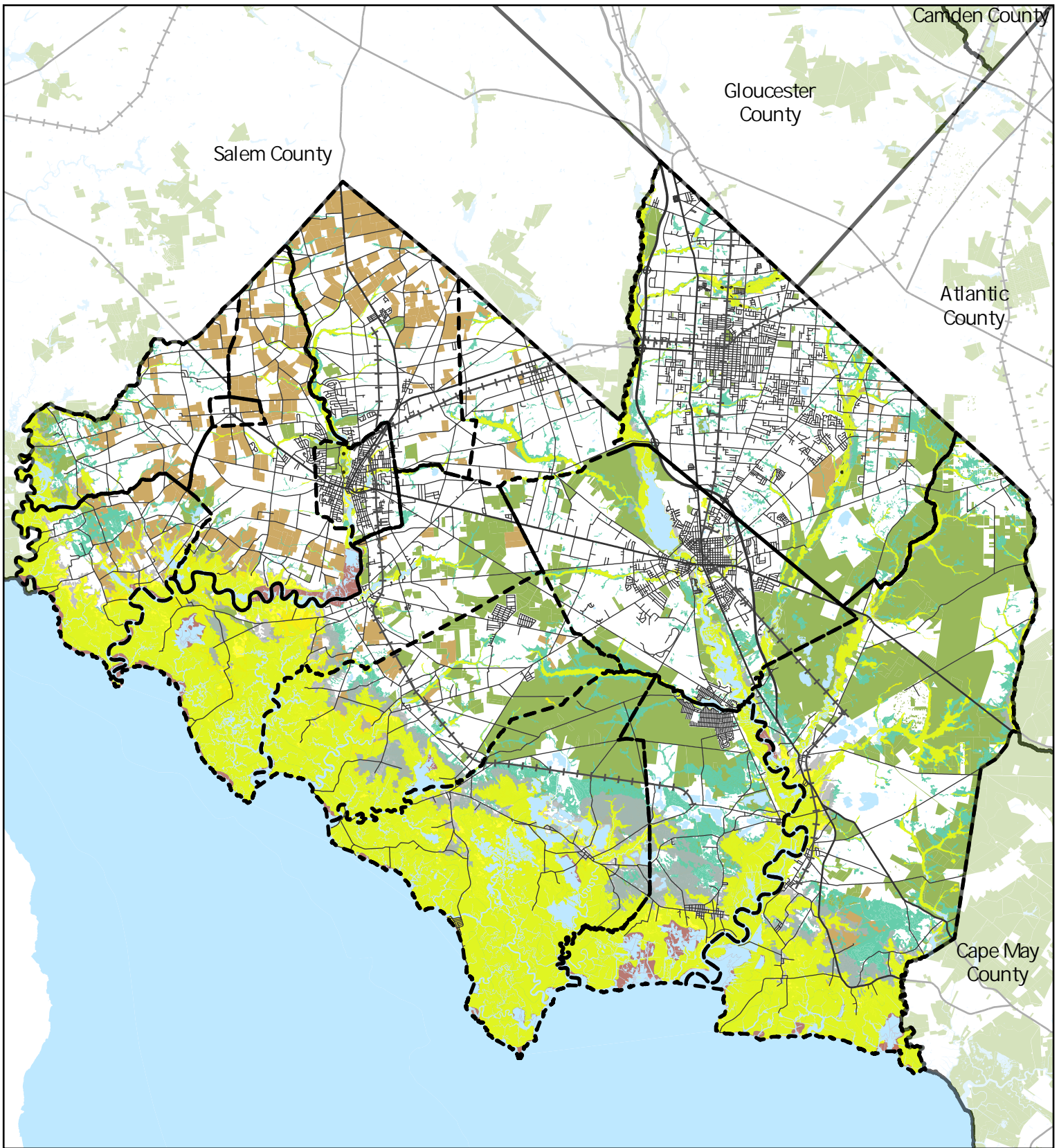


0 12,500 25,000 Feet

Source: Cumberland County GIS, 2020
 LULC, NJDEP, NJOGIS, NJOIT
 June 2025

Land Use Land Cover (2020)





- Agriculture
- Barren Land
- Forest
- Urban
- Water
- Wetlands



Environmental Features

Cumberland County

FEMA Floodplains

-  Zone A, AE, AO: 100-Year Floodplain
-  Zone VE: 100-Year Floodplain with Wave Action
-  0.2% Chance Annual Floodplain (500-Year Flood)
-  Floodway

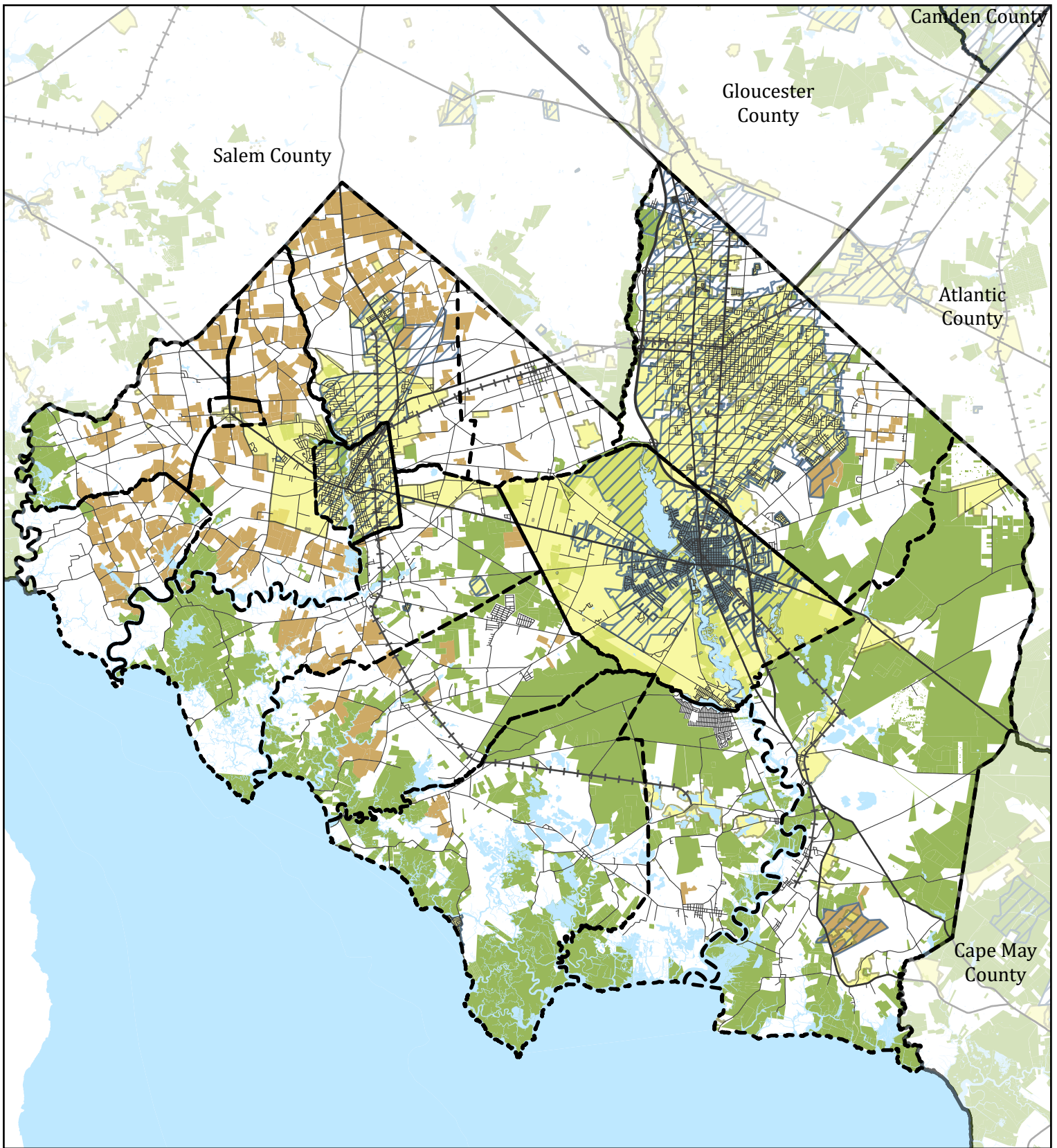
-  Preserved Farmland
-  Preserved Open Space
-  Wetlands



1





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Source: Cumberland County GIS,
NJDEP, NJGIS, NJOIT
June 2025



Utilities

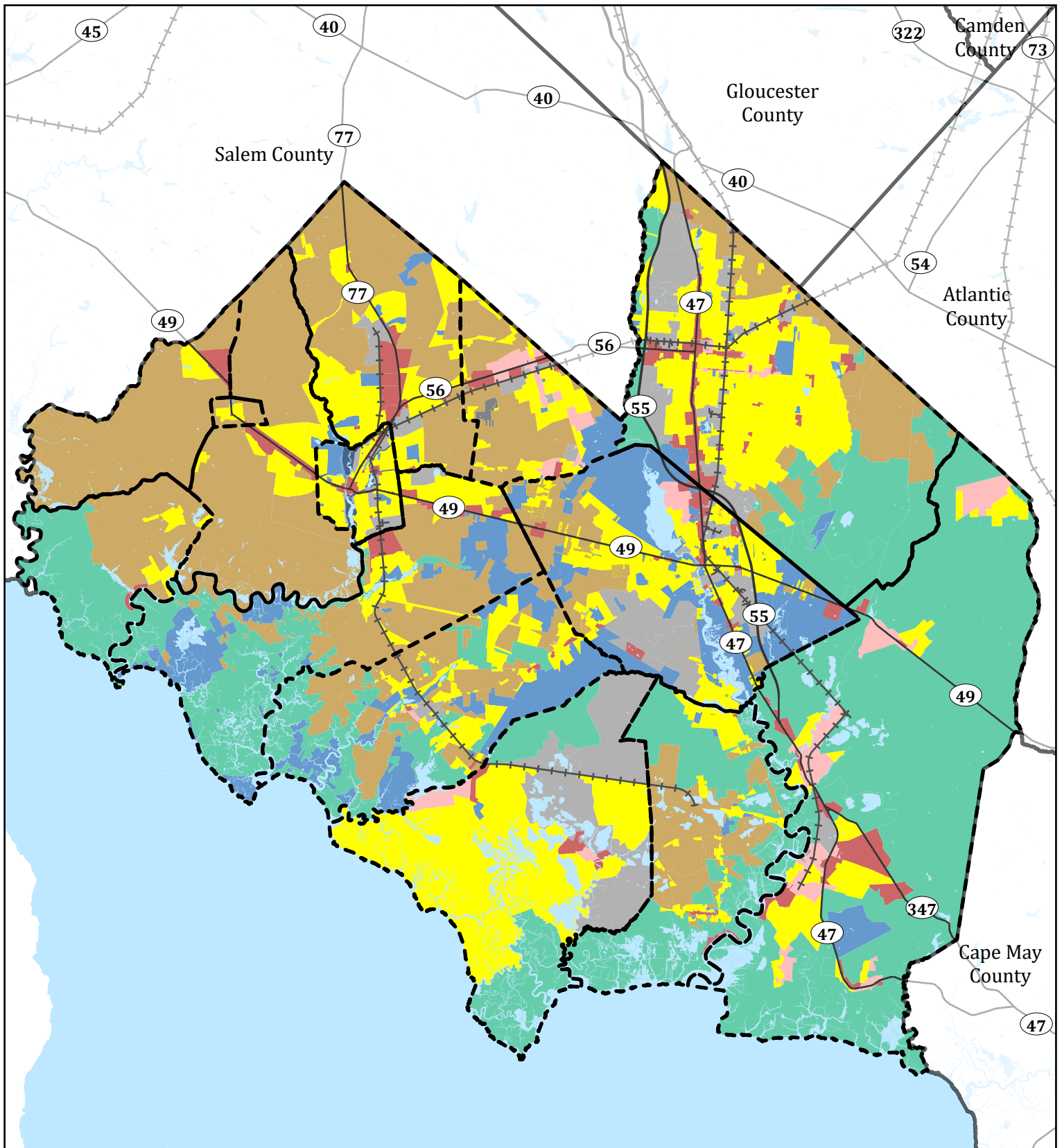
Cumberland County

-  Water Purveyor Service Area
-  Sewer Service Areas
-  Preserved Open Space
-  Preserved Farmland



0 12,500 25,000 Feet

Source: Cumberland County GIS,
NJDEP, NJOGIS, NJOIT
June 2025



Zoning











Cumberland County

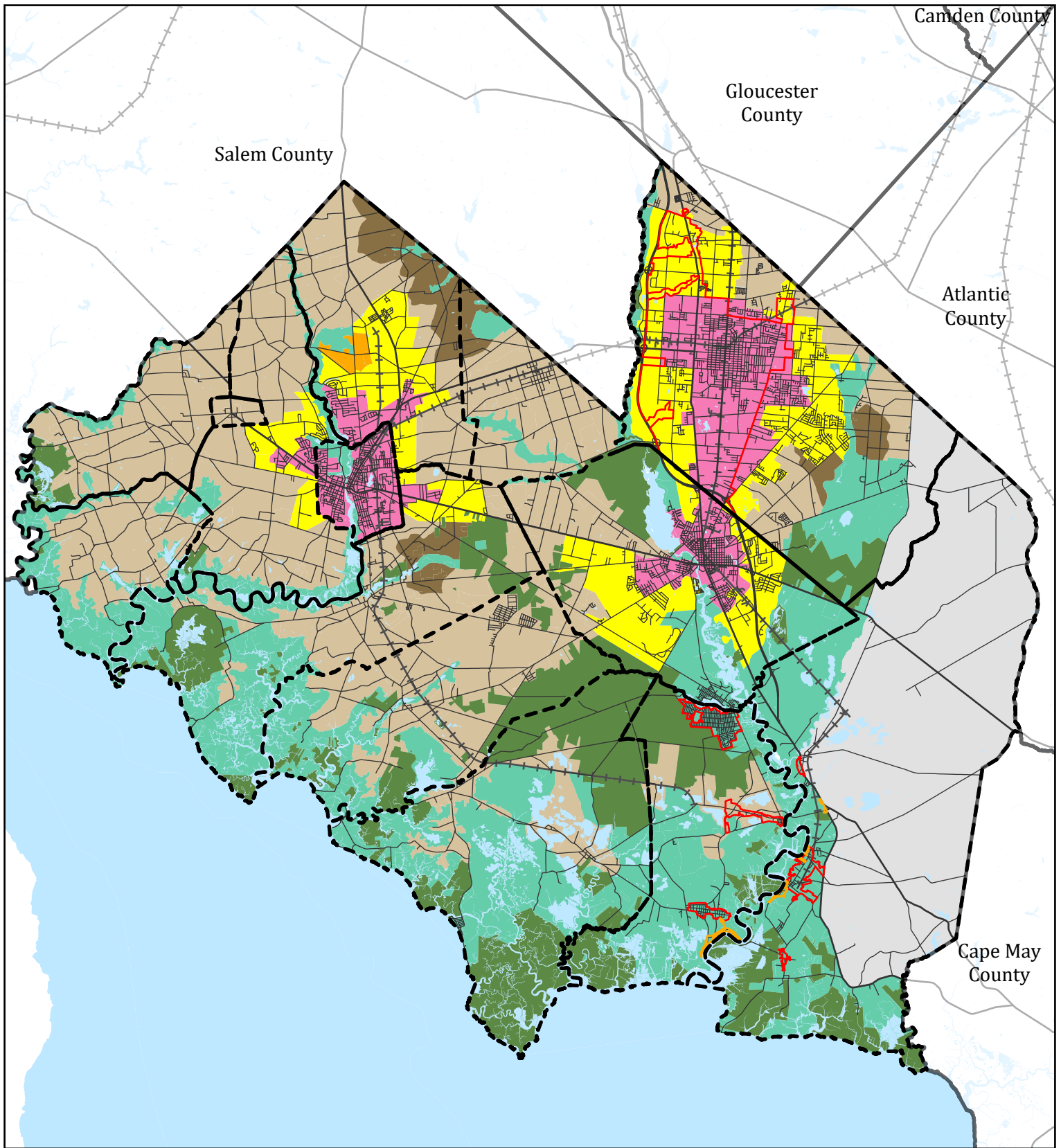


0 12,500 25,000 Feet

Source: Cumberland County GIS,
NJDEP, NJOGIS, NJOIT
June 2025

Zoning Districts

- | | | | |
|---|----------------------|---|--------------------|
|  | Agriculture |  | Residential |
|  | Commercial |  | Conservation |
|  | Industrial |  | Overlay |
|  | Mixed Use |  | Redevelopment Area |
|  | Public/Institutional |  | Waterfront |



State Planning Areas

Cumberland County



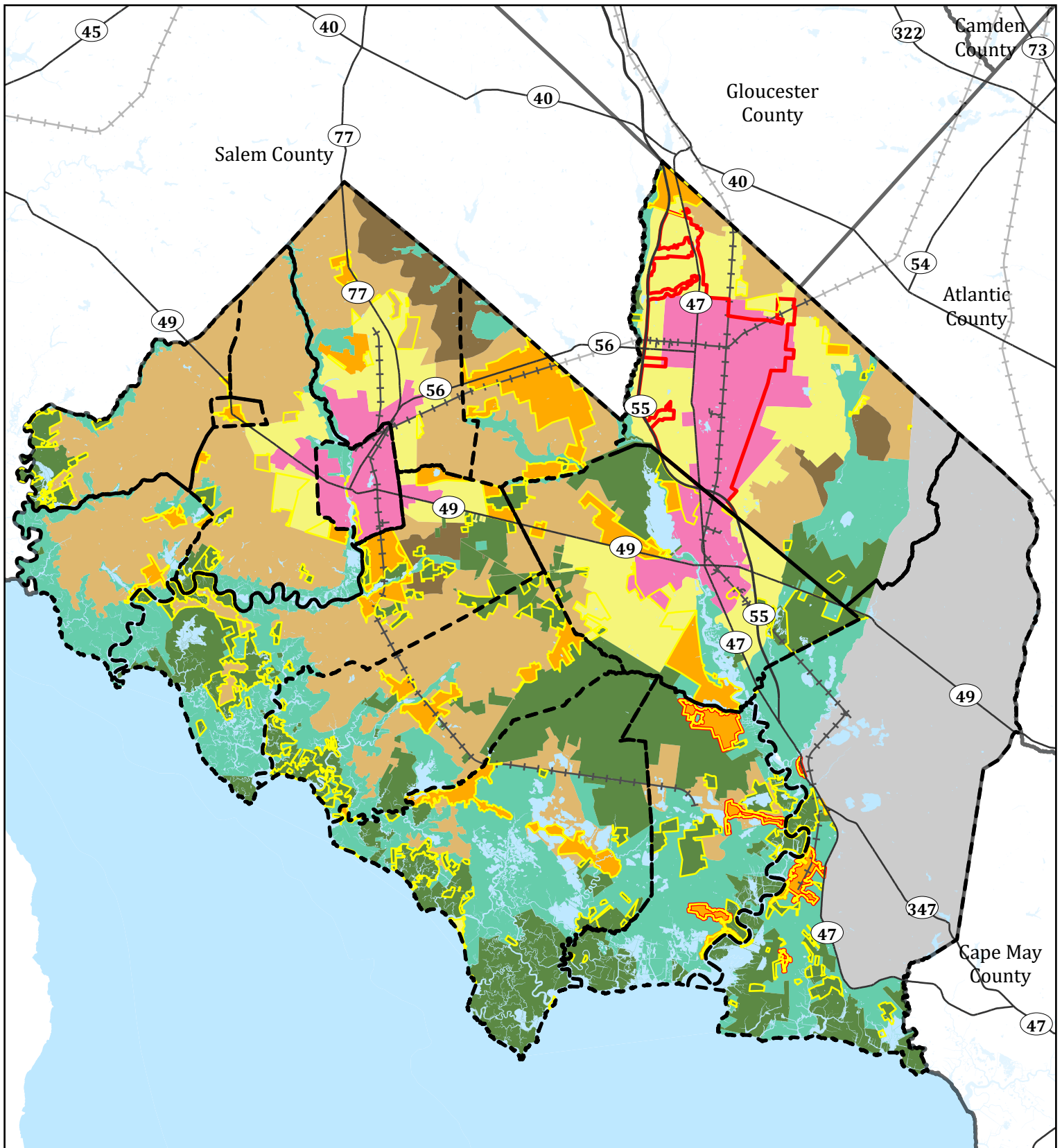
0 12,500 25,000 Feet

Source: Cumberland County GIS,
NJDEP, NJOGIS, NJOIT
June 2025

State Planning Areas












- PA1: Metropolitan
- PA2: Suburban
- PA3: Fringe
- PA4: Rural
- PA4B: Rural Environmentally Sensitive

- PA5: Environmentally Sensitive
- State Parks/Open Space
- Pinelands
- Designated Nodes (effective)
- Designated Centers (effective)



Assessment and Inconsistency

Cumberland County

- | | | | |
|---|--------------------------------|---|----------------------------|
|  | Planning Area Changes |  | PA2: Suburban |
|  | Designated Nodes (effective) |  | PA3: Fringe |
|  | Designated Centers (effective) |  | PA4: Rural |
|  | PA1: Metropolitan |  | PA4B: Rural Environ. Sens. |
| | Revised Planning Area |  | PA5: Environ. Sens. |
| | |  | State Parks/Open Space |
| | |  | Pinelands |

