



**MONMOUTH
COUNTY
PLANNING
BOARD**

**Technical
Assistance
Outreach
Brochure for
Municipal
Planning**



Volume

IV

**REDEVELOPMENT
AREA INVESTIGATION REPORT
&
REDEVELOPMENT PLAN PROCEDURES**



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**Duplicated on Quick Reference Guide*

USER DISCLAIMER: *This municipal planning outreach brochure does not replace or summarize all components of the New Jersey Municipal Land Use Law (MLUL), Local Redevelopment and Housing Law (LRHL), the Open Public Meetings Act and Open Public Records Act or any other laws mentioned or not mentioned herein. Please consult the full text of court decisions, redevelopment laws and redevelopment legal counsel familiar with the issues described in this guide for further guidance, as the topics and steps cited herein maybe advisory or changed as new laws are enacted or amended and court decisions may modify the ways these plans, reports, maps and laws are used.*

I. Introduction

This is the fourth volume in a series of technical assistance outreach brochures for municipal planning prepared by the Monmouth County Planning Board. The back of this brochure references additional volume titles. Volume IV provides both legal and optional procedural information and is a "how-to" guide on preparing a Redevelopment Area Investigation Report and Redevelopment Plan. It is divided into twelve sections. This brochure does not include extensive information on the implementation processes or redevelopment case law or decisions. Brochure Volume IV is intended for municipal planning boards, municipal clerks, attorneys, planners and land use board secretaries in the development and daily use of Redevelopment Area Investigation Reports and Redevelopment Plans.

Early Questions Municipalities Should Ask Themselves:

- 1) Why is an Area Investigation Report needed? What is a Redevelopment Plan?
- 2) What are the procedural steps for preparation and adoption and who is involved?

II. In Need of Redevelopment Vs. In Need of Rehabilitation

Municipalities can declare an area "in need of redevelopment" or an area "in need of rehabilitation." However, there are many distinct differences between both.

Areas "In Need of Redevelopment":

- A formal preliminary Redevelopment Area Investigation Report must be conducted.
- A public hearing required for area investigations.
- A special public notice is required for area investigations.
- The specified area can be declared in "need of redevelopment" by a municipality.
- The specified area must meet one of the following eight redevelopment criteria (N.J.S.A. 40A:12A-5):
 - A: Deterioration
 - B: Abandoned Commercial & Industrial Building
 - C: Public or Vacant Land for more than 10 years
 - D: Obsolete Layout and Design
 - E: Underutilization
 - F: Fire and Natural Disasters
 - G: Urban Enterprise Zones
 - H: Consistency with Smart Growth Planning Principles
- The Governing Body is the responsible entity to designate an "area in need of redevelopment."
- Eminent domain may be used in adopted "areas in need of redevelopment."

Areas "In Need of Rehabilitation":

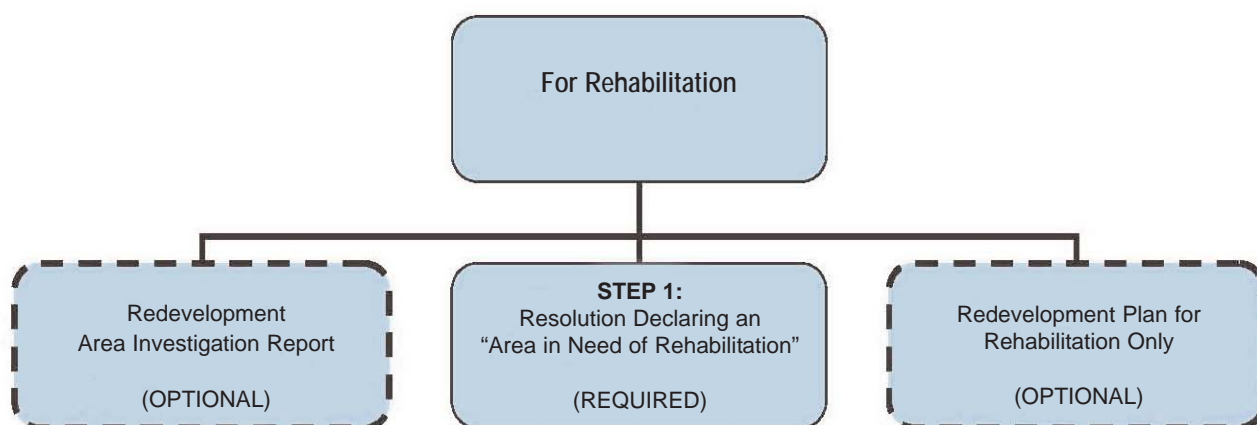
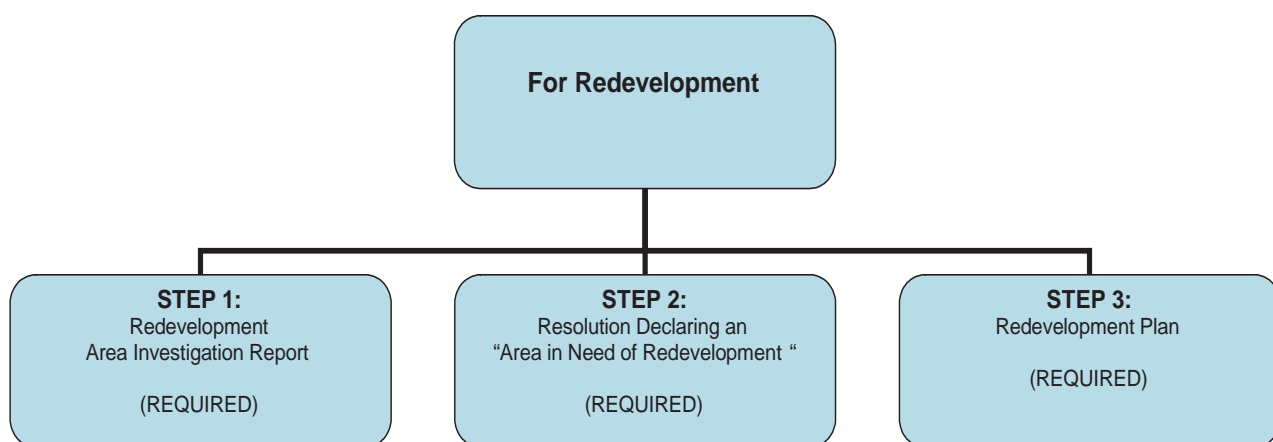
- No formal area investigation is required; however, a resolution must be adopted by the Governing Body.
- A public hearing is optional.
- No special notice requirements are needed beyond those required for resolutions adopted by a Governing Body for a public hearing (N.J.S.A. 40A:12A-7).
- Specified areas or an entire municipality may be declared in "need of rehabilitation."
- Areas in need of rehabilitation must meet one of the following rehabilitation conditions criteria:

1) A significant portion of structures therein are in a deteriorated or substandard condition and there is a continuing pattern of vacancy, abandonment or underutilization of properties in the area, with a persistent arrearage of property tax payments thereon; or

2) More than half of the housing stock in the delineated area is at least 50 years old or a majority of the water and sewer infrastructure in the delineated area is at least 50 years old and is in need of repair or substantial maintenance (N.J.S.A. 40A:12A-14).

II. In Need of Redevelopment Vs. In Need of Rehabilitation

- The Governing Body submits a resolution to declare an area "in need of rehabilitation" to the Planning Board for its review. This resolution may be adopted 45 days or later if a response is not received by the Planning Board.
- The Governing Body is the responsible entity that adopts an "area in need of rehabilitation."
- Eminent domain is not an allowable power for municipalities in adopted "areas in need of rehabilitation" unless exercise of that power is authorized under any other law in the State or is within an area determined to be in need of redevelopment (N.J.S.A. 40A:12A-15).
- Note that rehabilitation designations are often used by municipalities when infill development is desired.



III. Essentials to Know

FOR A REDEVELOPMENT AREA INVESTIGATION

<p>REDEVELOPMENT AREA INVESTIGATION REPORT DEFINITION:</p>	<p>A Redevelopment Area Investigation Report is comprised of a map of the study area under investigation used to determine if an area is in need of redevelopment. It contains written text on how the area meets redevelopment criterion found in the Local Redevelopment and Housing Law.</p>
<p>COMMONLY KNOWN AS:</p>	<p>Preliminary Area Investigation Report</p>
<p>AUTHORIZES PREPARATION:</p>	<p>Governing Body (by resolution)</p>
<p>PREPARES REPORT:</p>	<p>Planning Board (or its designated agent)</p>
<p>TYPICAL PREPARATION TIME:</p>	<p>3 - 9 Months</p>
<p>ADOPTION, AMENDMENT & REVISION POWERS</p>	<p>Governing Body (by resolution)</p>
<p>REQUIRED ELEMENTS:</p>	<p>1. Study Area Map 2. Statement of how Area meets AT LEAST ONE criterion below:</p> <p>REDEVELOPMENT CONDITIONS CRITERIA: "A": Deterioration "B": Abandoned Commercial & Industrial Buildings "C": Public or Vacant Land for More Than 10 Years "D": Obsolete Layout and Design "E": Underutilization "F": Fire and Natural Disasters "G": Urban Enterprise Zones "H": Consistency with Smart Growth planning principles</p> <p><i>See N.J.S.40A:12A-5 for full description characteristics of each redevelopment criterion noted above.</i></p>
<p>OPTIONAL CONTENTS:</p>	<p>Executive Summary; Photographs; Demographics Study Area Profile; Appendices</p>
<p>CONSEQUENCES TO INACCURATE ADOPTION:</p>	<p>Redevelopment Area Investigations can be legally challenged in court by citizens, developers and others if the adoption and public noticing requirements are not correctly executed. Redevelopment designations may therefore be invalidated by the courts.</p>
<p>OBJECTIONS TO DETERMINATION:</p>	<p>A person has 45 days following the adoption of a redevelopment area designation to file a written objection. Municipality can take no further action to acquire property by condemnation within the redevelopment area during this timeframe.</p>

III. Essentials to Know

FOR A REDEVELOPMENT PLAN

<p>REDEVELOPMENT PLAN DEFINITION</p>	<p>"A plan adopted by the Governing Body of a municipality for redevelopment or rehabilitation of all or any part of a redevelopment area, or an area in need of rehabilitation, which plan shall be sufficiently complete to indicate its relationship to definitive municipal objectives as to appropriate land uses, public transportation and utilities, recreational and municipal facilities, and other public improvements; and to indicate proposed land uses and building requirements in the redevelopment area or area in need of rehabilitation or both" (N.J.S.A. 40A:12A-3).</p>
<p>AUTHORIZES PREPARATION:</p>	<p>Governing Body (by resolution)</p>
<p>PREPARES REDEVELOPMENT PLAN:</p>	<p>OPTION # 1: PLANNING BOARD Prepares Redevelopment Plan and refers to Governing Body for ordinance adoption; OR OPTION # 2: PLANNING BOARD Prepares and adopts Plan as sub-element of Master Plan and recommends Governing Body adoption by ordinance; OR OPTION # 3: PLANNING BOARD Prepares and adopts Redevelopment Plan as an amendment to land use element of Master Plan. Adopts resolution referring Redevelopment Plan to Governing Body for adoption. OPTION # 4: GOVERNING BODY Prepares Redevelopment Plan and requests Planning Board review and issue recommendation report within 45 days upon referral prior to Governing Body adoption by ordinance; OR OPTION # 5: REDEVELOPMENT AGENCY Governing Body appoints redevelopment agency. Agency then prepares Redevelopment Plan and recommends ordinance adoption by the Governing Body. The governing body may designate itself as the redevelopment entity.</p>
<p>TYPICAL PREPARATION TIME:</p>	<p>3 - 12 months (or longer depending on the complexity of the study area, visioning process and/or community dynamics).</p>
<p>ADOPTION, AMENDMENT & REVISION POWERS:</p>	<p>Governing Body (by ordinance).</p>
<p>REQUIRED ELEMENTS:</p>	<ol style="list-style-type: none"> 1. The Redevelopment Plan outlines its relationship to local objectives as appropriate to land uses, population density, improved traffic and public transportation, public utilities, recreational and community facilities and other public improvements. 2. Indicates proposed land uses and building requirements. 3. Identifies any property proposed or may be acquired. 4. States relationship of the Redevelopment Plan to county master plan, adjoining municipality's master plans and State Development and Redevelopment Plan. 5. Indicates relationship to municipal development regulations. 6. Includes adequate provisions for the temporary and permanent relocation of residents in the project area.
<p>OPTIONAL CONTENTS:</p>	<ol style="list-style-type: none"> 1. Provisions of affordable housing with the Fair Housing Act. 2. Infrastructure and public improvements; Rehabilitation standards. 3. Provisions for code enforcement and ordinances. 4. Policies for long and short-term property tax incentives. 5. Selection procedures for a redeveloper. 6. Standards for certificates of completion. 7. Amendment procedures; Appendices.
<p>CONSEQUENCES TO INACCURATE ADOPTION:</p>	<p>If not properly adopted, legal challenges can arise on the validity of the Redevelopment Plan. Redevelopment projects can't be undertaken or carried out without an adopted Redevelopment Plan by ordinance (N.J.S.A. 40A:12A-7).</p>

IV. Redevelopment Area Investigation Report

Redevelopment areas are created by declaring an "area in need of redevelopment" through the adoption of what is known as a Redevelopment Area Investigation Report.

A) Purpose

Redevelopment Area Investigation Reports help identify if specific parcels in a proposed redevelopment area meets New Jersey redevelopment statutory criteria to qualify as an "area in need of redevelopment".

B) Typical Deliverable

Below is a sample chapter for a Redevelopment Area Investigation Report.

The sample table of contents below should not limit municipalities in developing their own Redevelopment Plans.

Sample Table of Contents:

I.	Introduction
II.	Executive Summary
III.	Redevelopment Process
IV.	Study Area Profile*
V.	Redevelopment Statutory Criteria
VI.	Statement on Area Conformity to Criteria**
VII.	Recommendations
VIII.	Next Steps
IX.	Conclusion
X.	Appendices
	a. Redevelopment Study Area Map**
	b. Study Area Parcel List
	c. Data Tables
	d. Photographs
	e. Copy of resolution authorizing Area Investigation Report

** Study area map may be included here or in the appendix.*

*** Required by the New Jersey Redevelopment and Housing Law statute (N.J.S.A. 40A:12A-6).*

C) Typical Challenges

Typical Challenges to Redevelopment Area Investigation Report:

- Procedural missteps on content, noticing requirements or adoption processes.
- Not meeting or fulfilling all legal requirements under state redevelopment laws.
- Not understanding redevelopment laws, noticing requirements and entities involved.
- Failing to provide clear evidence in the area investigation report.

VI. Redevelopment Area Investigation Report *(continued)*

D.) Notice Requirements

Although not required, it is good planning practice to send adopted redevelopment resolutions, ordinances, reports and plans to the County Planning Board to review zoning and coordinate regional planning impacts on a redevelopment area. Notice requirements DIFFER between a Redevelopment Area Investigation and a Redevelopment Plan.

Before Adoption:

Required to Public:

Newspapers:

- Public notice must be given TWICE (once a week for two consecutive weeks) in a general newspaper used regularly by municipality for public notices.
- Second notice must appear no less than 10 days prior to the public hearing.

Affected Property Owners:

- Public notice is mailed at least 10 days prior to the hearing date to the last owner, if any, of each parcel in the study area by using the assessment records of the municipality.
- Affected property owners must be notified that their property is in study area being considered for redevelopment area designation.

Miscellaneous Property Owners:

- Public notice is sent to any person who claims an interest in any parcel within the redevelopment area that noted by municipal tax assessor in the tax assessment records upon request by claimants.

After Adoption:

Required to Public:

Newspapers:

- Notice of the adoption of the resolution declaring it an "area in need of redevelopment" must be provided in a general newspaper used by the municipality.

Adopted Resolution Required to New Jersey Commissioner of Community Affairs:

- Upon redevelopment area designation adoption by the Governing Body, the resolution is required to be sent to the Commissioner of Community Affairs for approval to confirm that the redevelopment area designation is located where development and redevelopment is encouraged under New Jersey State law. If no response is provided by the commissioner after 30 days, the redevelopment determination is automatically approved for the municipality (N.J.S.A. 40A: 12A-6).

IV. Redevelopment Area Investigation Report *(continued)*

E) Adoption Steps

The adoption steps for a Redevelopment Area Investigation Report are critical to revitalizing neighborhoods.

- Selected entity designates preparer and develops a Redevelopment Area Investigation Report.
- Public notice is provided - once for two consecutive weeks with the second notice no later than 10 days prior to the hearing date.
- Review full text of Local Redevelopment and Housing Law N.J.S.A. 40A: 12A-5 for thorough description of each redevelopment criterion and its characteristics when developing Area Investigation Reports. It is advisable to review relevant redevelopment case laws.
- Preparing entity presents draft Redevelopment Area Investigation report at a noticed hearing (i.e. report explaining how the study area meets redevelopment statute criteria is provided).
- Planning Board hears testimony and any public comments made on the report at the hearing.
- Preparing entity compiles comments and prepares final draft report with revisions made.
- Planning Board notices and holds a public hearing.
- Planner or Planning Board presents a final draft report for adoption.
- Planning Board adopts the final draft Redevelopment Area Investigation Report (i.e. quorum required and majority favor vote is needed for adoption).
- Planning Board memorializes decision by resolution at a public meeting no more than 45 days after hearing.
- Redevelopment Area Investigation Report should be made available to the public.
- Resolution adopting area as "in need of redevelopment" by Governing Body is sent to New Jersey Commissioner of Community Affairs for approval for designation where development and redevelopment is encouraged by State law. If no response is received after 30 days, determination is automatically approved by the Commissioner of Community Affairs.
- Note: Some municipalities may sell their Redevelopment Area Investigation Report to the general public for a nominal fee, maintain free hardcopies in select municipal locations or feature it online.

IV. Redevelopment Area Investigation Report *(continued)*

F) Procedural Steps Checklist

Use the following sample checklist to develop a Redevelopment Area Investigation Report:

STEP 1: Select Study Area Boundaries

- Governing Body selects the study area boundaries and parcels to investigate for redevelopment. It is advisable to review and ensure that the study area is within an approved redevelopment or development planning area in the New Jersey State Development and Redevelopment Plan.

- Note: According to the Local Redevelopment and Housing Law, a redevelopment area may include lands, buildings or improvements which of themselves are not detrimental to the public health, safety, or welfare, but the inclusion of which is found necessary, with or without change in their condition, for the effective redevelopment of the area which they are a part (N.J.S.A. 40A:12A-3).

STEP 2: Authorize Report

- Governing Body authorizes Planning Board by resolution to investigate study area to determine if it meets redevelopment conditions criteria under state law.

STEP 3: Designate Preparer

- Planning Board chooses, by resolution, to appoint or hire a planner (preferably specializing in redevelopment) to develop a Redevelopment Area Investigation Report on their behalf or the Planning Board may prepare a report itself. (If no staff planner is available at the municipal level, it is the recommended to hire a professional planning consultant that specializes in redevelopment.)

- Advisable to appoint or hire redevelopment counsel for preparation assistance.

STEP 4: Collect Data

- A planner or the Planning Board collects and reviews multiple municipal data sources such as those noted in Step 5. It is advisable to use the most recent data.

- Site assessment or analysis is conducted in the study area to obtain input and guidance (i.e. conducts interviews with residents or businesses, field surveys, take photographs, etc.)

STEP 5: Review Data (Typical Sources)

- Local Redevelopment and Housing Law including mandatory and optional elements.

- Current redevelopment cases laws or decisions or guidance from redevelopment counsel.

- Historical documents, maps or other data about study area.

- Zoning Map and any changes if applicable.

IV. Redevelopment Area Investigation Report *(continued)*

- Master Plan and Zoning Ordinance and any related amendments.
- Municipal tax maps and assessment records.
- Photographs and/or aerials of the study area and its parcels.
- Physical site assessments, field surveys or interviews conducted within the study area.
- Any applicable planning studies and maps (economic, housing, etc.).
- State agency rules and policies such as COAH, OSG, DEP, DOT, etc.
- Applicable federal regulations, policies or maps (i.e. Flood Emergency Management Act (FEMA), etc.)
- Local subdivision and site plan review regulations, checklists and / or policies.
- Zoning Maps or Zoning Ordinances of adjoining municipalities, if desired.
- Other supporting documents related to parcels in study area.
- U.S. Census Bureau data or other related demographic information.
- Local building code violations materials.
- Recent redevelopment case law and decisions.
- Regional, county and state plans and/or maps.

STEP 6: Incorporate Policies

- Proposed and recently adopted Master Plan recommendations or municipal policies.
- Requirements of any adopted redevelopment zones or redevelopment plan regulations, if applicable.

STEP 7: Write Draft Report

- Create a draft Area Investigation Report that meets the redevelopment statutory requirements under the Local Redevelopment and Housing Law.
- Thoroughly document and provide examples of how the study area satisfies each redevelopment condition(s) criteria used. Must meet at least one redevelopment criteria.
- Provide a final recommendation within the report to the Governing Body on whether the area meets the redevelopment criteria to be designated an "area in need of redevelopment."

STEP 8: Present & Adopt Final Report

- A draft Area Investigation Report is presented to Planning Board at a noticed public hearing.
- The Planner or Planning Board makes any necessary changes to the final report based on comments, if applicable.
- The Planner or Planning Board presents the final report at a noticed public hearing for adoption.
- The Planning Board hears testimony and makes a decision to recommend a determination of need for redevelopment of the study area to the Governing Body.

IV. Redevelopment Area Investigation Report *(continued)*

- The Planning Board memorializes a resolution recommending the Governing Body adopt its recommendations.
- The Governing Body reviews Planning Board recommendation and decides whether to approve or reject their recommendation. If approved, the Governing Body memorializes the decision by resolution and declares the "area in need of redevelopment."
- The Notice by general or official newspaper is provided subsequent to resolution adoption declaring the area "in need of redevelopment" by the Governing Body. Maintain a copy of all publication notices for municipal records.
- If applicable written objections were received, a notice of redevelopment area determination must be served within 10 days of determination to objectors and if no further action is taken to acquire property by condemnation can be made within the redevelopment area for 45 days. (N.J.S.A. 40A:12A-6).
- The Redevelopment Area Investigation Report is made available to the general public. Note: Some municipalities may sell Area Investigation Reports to the general public for a nominal fee, maintain hardcopies in select municipal locations, or feature it free online.

STEP 9: Notice Commissioner of Community Affairs

- The Municipal Clerk sends a copy of the adopted resolution determining an "area in need of redevelopment" to the New Jersey Commissioner of Community Affairs. The Commissioner reviews to confirm and approve if area is located in an encouraged development or redevelopment area designated by State law.
- The Commissioner of Community Affairs provides a letter to the municipality. Automatic approval is received if letter is not received within 30 days by the municipality. (N.J.S.A. 40A:12A-6). Resolution does not become effective otherwise (N.J.S.A. 40A:12A-14).

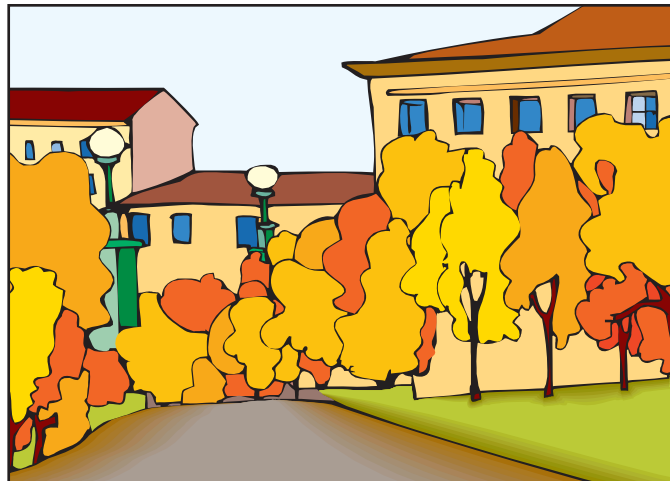
STEP 10: Prepare, Adopt and Implement Redevelopment Plan

- See the enclosed Redevelopment Plan checklist for more details.

V. Redevelopment Plan

A) Purpose

- Redevelopment Plan helps identify and regulate density, intensity and sitings in a redevelopment area.
- Identifies priorities as this relate to redevelopment within a municipality.
- Provides guidance to municipal boards in land use decision-making processes.
- Articulates any desired land uses, design, aesthetics, and other requirements to developers and the public.
- This is the main tool used to help implement redevelopment.
- Helps implement redevelopment or revitalization policies within a community.
- Regulates land use and building requirements in a redevelopment zoned district.
- Promotes public health and safety by correcting dilapidated standards existing in area.
- Provides incentives for expansion and improvement of deteriorated areas of a municipality. Manages aesthetics and communicates community values in adopted redevelopment areas.



V. Redevelopment Plan

B) Typical Deliverables

"No redevelopment project shall be undertaken or carried out except in accordance with a Redevelopment Plan adopted by ordinance of the municipal Governing Body, upon its findings that the specifically delineated project area is located in an area in need of redevelopment or an area in need of rehabilitation or in both" (N.J.S.A. 40A12A-7).

The sample table of contents below should not limit municipalities in developing their own Redevelopment Plans.

Sample Table of Contents:

- I. Introduction**
- II. Executive Summary**
- III. Determination of Need Conclusions**
- IV. Vision**
- V. General Land Use Concept**
- VI. Land Uses and Building Requirements ***
 - a. Land Use Regulation
 - b. General Design Guidelines
 - c. Block Specific Design Standards
- VII. Implementation**
 - a. Site Plan and Subdivision Review
 - b. Acquisition *
 - c. Relocation *
 - d. Redevelopment by Property Owners
- VIII. General Provisions**
 - a. Procedures for Amending Plan
 - b. Amendments to Zoning Maps
 - c. Variance Procedures
 - d. Redevelopment Plan Ordinance Validity
 - e. Expiration of Plan
- IX. Plan Relationships to Other Plans ***
 - a. Relationship to Master Plan, Regional Plans, and State Development and Redevelopment Plan
- X. Appendix**
 - a. List of Parcels in Redevelopment Area
 - b. Concept Plan Illustrations and Scenarios
 - c. Redevelopment Area Map
 - d. Other Maps (i.e. land use, acquisition, phased development options)
 - e. Copy of Ordinance declaring "Area in Need of Redevelopment"

** Required element by the Local Redevelopment and Housing Law (N.J.S.A. 40A: 12A-7).*

V. Redevelopment Plan

C) Typical Challenges

Typical Challenges to Redevelopment Plan Using Redevelopment:

- Procedural missteps on content, noticing requirements or adoption processes.
- Not meeting or fulfilling all legal requirements under state redevelopment laws.
- Not understanding redevelopment laws, noticing requirements and entities involved.
- Updated redevelopment procedures based on the effects of recent court decisions.
- Limited staff capacity, training or specialized knowledge for redevelopment law.
- Developing consensus or public support among various stakeholders on redevelopment.
- Working with multiple owners for land assembly acquisition for a redevelopment project.
- Communicating and negating misinformation regarding redevelopment to the general public and others.
- Presumptions that eminent domain will be used in every instance of redevelopment.
- Gaining political interest and resources available for redevelopment implementation.
- Altering administration or application practices may fluctuate as political entities change at the local level.
- Attracting prospective developer's interest in Redevelopment Plan implementation.
- Challenges experienced from market forces on redevelopment implementation processes.
- Attaining specialized redevelopment legal counsel for assistance.
- Understanding the differences between declaring an "area in need of redevelopment" versus an area in need of rehabilitation."
- Addressing contaminated lands or landlocked parcels in a redevelopment area.
- Ensuring consistency or effectuation with the Master Plan when possible.

D) Notice Requirements

Although not required, it is good planning practice to send adopted redevelopment resolutions, ordinances, reports and plans to the County Planning Board to review zoning and coordinate regional planning impacts on a redevelopment area. Notice requirements DIFFER between a Redevelopment Area Investigation and a Redevelopment Plan.

Redevelopment Plans require no special public notice beyond those required for the adoption of ordinances by a municipality (N.J.S.A. 40A:12A-7).

V. Redevelopment Plan *(continued)*

E) Adoption Steps

Adoption steps for a Redevelopment Plan are groundwork for redevelopment implementation.

- Municipality selects one of the below entities to develop a Redevelopment Plan:
 - OPTION # 1:** PLANNING BOARD
Prepares Redevelopment Plan and refers to Governing Body for ordinance adoption; OR
 - OPTION # 2:** PLANNING BOARD
Adopts Plan as sub-element of Master Plan and recommends Governing Body adoption by ordinance; OR
 - OPTION # 3:** PLANNING BOARD
Adopts Redevelopment Plan as an amendment to land use element of Master Plan. Adopts a resolution referring Redevelopment Plan to Governing Body for adoption; OR
 - OPTION # 4:** GOVERNING BODY
Prepares Redevelopment Plan and requests Planning Board review. Planning Board issues recommendation report within 45 days upon referral prior to Governing Body adoption by ordinance; OR
 - OPTION # 5:** REDEVELOPMENT ENTITY
The Governing Body appoints the redevelopment entity. The entity develops Redevelopment Plan and recommends ordinance adoption by the Governing Body.
- Selected entity prepares a draft Redevelopment Plan for the designated redevelopment area.
- Preparing entity presents draft Redevelopment Plan. Special notice requirements are not needed.
- If using above Option #1, Governing Body is relieved of the requirements of Planning Board referral comments. If using above Option # 3, Planning Board must submit a report containing a recommendation concerning the Redevelopment Plan within 45 days.
- The Governing Body hears testimony and any public comments made on the plan at the hearing.
- Preparing entity compiles comments, makes revisions and prepares final draft plan.
- The Governing Body adopts final draft Redevelopment Plan at a public hearing (i.e. quorum required and majority favor vote is needed for adoption).
- The Governing Body memorializes the decision by ordinance at a public meeting no more than 45 days after the hearing. The Redevelopment Plan is then made available to the public.
- The Zoning Map is updated to reflect the new redevelopment area zone or overlay district.
- All applications made on parcels within a designated redevelopment area are submitted to the municipal Planning Board for its review and approval (N.J.S.A. 40A:12A-13).
- Note: Some municipalities may sell their Redevelopment Plan to the general public for a nominal fee, maintain hardcopies in select municipal locations or feature it online.
- Municipality selects a redevelopment entity to implement the Redevelopment Plan which can include a redevelopment authority, county improvement authority, Governing Body, or local housing authority.
- Municipality embarks on Redevelopment Plan implementation processes.

V. Redevelopment Plan *(continued)*

F) Procedural Steps Checklist

Use the following checklist to help track your steps in developing a Redevelopment Plan:

STEP 1: Authorize Plan

- The Governing Body authorizes by resolution to prepare a Redevelopment Plan.
- It is advisable to appoint or hire redevelopment counsel to assist with preparing the plan.

STEP 2: Designate Preparer

- The Governing Body selects one of the following to prepare a Redevelopment Plan:
 - OPTION # 1: PLANNING BOARD**
Prepares the Redevelopment Plan and refers to the Governing Body for ordinance adoption; OR
 - OPTION # 2: PLANNING BOARD**
Adopts Plan as sub-element of Master Plan and recommends to the Governing Body adoption by ordinance; OR
 - OPTION # 3: PLANNING BOARD**
Adopt Redevelopment Plan as an amendment to land use element of Master Plan. Then it adopts a resolution referring the Redevelopment Plan to the Governing Body for adoption.
 - OPTION # 4: GOVERNING BODY**
Prepares Redevelopment Plan and requests Planning Board review and issues recommendation report within 45 days upon referral prior to the Governing Body adoption by ordinance; OR
 - OPTION # 5: REDEVELOPMENT ENTITY**
The Redevelopment entity is appointed by the Governing Body. The entity develops Redevelopment Plan and recommends ordinance adoption by the Governing Body.

STEP 3: Collect Data

- The preparing entity collects and reviews multiple data sources such as those noted in Step 4 below to prepare a Redevelopment Plan. It is advisable to use most recent data.

STEP 4: Review Data (Typical Sources)

- Local Redevelopment and Housing Law. (Understand mandatory and optional elements).
- Current redevelopment case laws or decisions or guidance from redevelopment counsel.
- Redevelopment Area Investigation Report adopted for the applicable study area.
- Master Plan.
- Zoning Map, Zoning Ordinance and amendments, if any.

V. Redevelopment Plan *(continued)*

- Municipal tax maps and assessment records. Photographs and aerials of redevelopment area.
- Any recently approved or pending development application cases before the municipality in the redevelopment area.
- Any applicable planning studies or U.S. Census Bureau data (economic, housing, etc.). Zoning Maps, Master Plans, or Zoning Ordinances of adjoining municipalities to redevelopment area, if desired. Other adjoining municipalities, regional and state plans.
- County or regional plans or maps.

STEP 5: Identify Additional Data

- Any proposed and recently adopted municipal land use regulations and amendments.
- Include any conclusions or recommendations from the Area Investigation Report.
- Any pending development applications in redevelopment area for planning consideration.

STEP 6: Create Vision & Alternatives

- Develop a vision and any planned alternatives for the redevelopment area. (Typical consultation occurs with the Governing Body, public, and community stakeholders). May explore the use of charrettes, workshop meetings, visioning exercises, hearings, etc. to obtain input and develop alternatives.
- Identify relationship of the redevelopment area to other plans.
- Consult with Redevelopment Steering Committee (if established) or redevelopment counsel.

STEP 7: Develop Redevelopment Plan

- Create a Redevelopment Plan that contains all the required elements under the Local Redevelopment and Housing Law. May add optional sections as well.

STEP 8: Present & Adopt

- Designated entity that developed the Redevelopment Plan presents the plan before the Governing Body.
- The public hearing is scheduled and notice is issued, if applicable.
- The Governing Body hears all testimony and makes a decision to adopt or not adopt the Redevelopment Plan. If adopted, the Governing Body memorializes decision by ordinance by a majority vote.
- The Redevelopment Plan is adopted formally by the municipality.
- Notice is provided on the adoption of the Redevelopment Plan ordinance by general or official newspaper publication. Maintain a copy of publication notice for municipal records.
- The Redevelopment Plan is made available to the general public.
- Note: Some municipalities may sell their Redevelopment Plan to the general public for a nominal fee, maintain free hardcopies in select municipal locations or feature it free online.
- If applicable, the Planning Board begins reviewing site plans and subdivisions proposed within the adopted redevelopment area utilizing the adopted Redevelopment Plan.

VI. Resolution - Rehabilitation

A) Purpose

Rehabilitation is often used when eminent domain is not sought. It can also be used where there are few parcels, or rehabilitation of existing properties is primarily desired in a particular area. Additionally, rehabilitation for an area is often used for parcels that are already owned by private individuals or redevelopers and is in need of rehabilitation only. Rehabilitation is an often easier option or alternative to redevelopment given the right circumstances. To adopt an "area in need of rehabilitation," you must adopt a resolution declaring it an "area in need of rehabilitation."

B) Typical Deliverable

OPTIONAL: Redevelopment Plan - Using Rehabilitation

Sample Table of Contents:

- I. Introduction**
- II. Executive Summary**
- III. Determination of Need Conclusions**
- IV. Vision & Goals**
- V. General Rehabilitation Concept**
- VI. Rehabilitation Requirements**
 - a. Land Use / Building Regulation
 - b. General Design Guidelines
 - c. Block Specific Design Standards
- VII. Implementation**
 - a. Site Plan and Subdivision Review
 - b. Rehabilitation Procedures by Property Owners
 - c. Powers Granted:
 - Rehabilitation
 - Redevelopment
 - Tax Abatements and Exemptions
- VIII. General Provisions**
 - a. Procedures for Amending Plan
 - b. Expiration of Plan
- IX. Appendix**
 - a. List of Parcels in Rehabilitation Area
 - b. Concept Plan Illustrations and Scenarios
 - c. Rehabilitated Area Map
 - d. Other Maps
 - e. Copy of Resolution declaring "Area in Need of Rehabilitation"

VI. Resolution - Rehabilitation *(continued)*

C) Typical Challenges

Typical Challenges to Rehabilitation:

- Enforcement of rehabilitation standards or creating incentives or outlining standards for rehabilitation for property owners.
- Engaging absentee landlords or property owners to meet standards.
- Addressing contaminated lands or landlocked parcels in a rehabilitation area.
- Ensuring consistency or effectuation with the Master Plan or other plans or policies over time.
- Can be a slower process to see results over large areas.

D) Noticing Requirements

- See adoption steps and checklist for more details.

E) Adoption Steps

Adoption steps for an "area in need of rehabilitation" are slightly different than designating "an area in need of redevelopment."

- Governing Body prepares a resolution to declare an "area in need of rehabilitation."
- Governing Body sends resolution to the Planning Board for its review.
- Planning Board reviews resolution. If the Planning Board fails to submit its recommendations within 45 days, the Governing Body may adopt the resolution with or without modifications (N.J.S.A. 40A: 12A-14).
- Governing Body memorializes the resolution decision.
- The Zoning Map is updated to reflect the newly declared rehabilitation zoned areas.

VI. Resolution - Rehabilitation *(continued)*

F) Procedural Checklist

Use the following checklist to help navigate through the steps needed to designate an "area in need of rehabilitation." Most communities will designate an area in need of rehabilitation if they are not seeking to use eminent domain, have few parcels or want to work with or encourage existing property owners to rehabilitate their properties.

STEP 1: Designate & Adopt Rehabilitation Area

- The Governing Body prepares a resolution designating the "area in need of rehabilitation."
- OPTIONAL:** The Governing Body may elect to develop an investigation report supporting determination declaration of "area in need of rehabilitation." If so, see the enclosed checklist.
- The Governing Body submits a resolution to the Planning Board for its review for 45 days.
- The Planning Board submits its resolution of recommendations or modifications to Governing Body. The Governing Body may consider or disregard recommendations and adopt resolution.
- If Planning Board response not received within 45 days, the Governing Body may move forward with adoption of resolution to declare "area in need of rehabilitation."

STEP 2: Develop Redevelopment Plan (OPTIONAL)

- See the Redevelopment Plan Checklist steps 3-8 for more details.

STEP 3: Notice Commissioner of Community Affairs

- The Municipal Clerk sends copy of adopted resolution determining an "area in need of rehabilitation" to New Jersey Commissioner of Community Affairs. The Commissioner reviews to confirm and approve if the area is located in an encouraged development or redevelopment area designated by State law.
- The Commissioner of Community Affairs provides a letter of finding to the municipality. Automatic approval received if letter is not provided within 30 days to the municipality. (N.J.S.A.40A:12A-6). The resolution does not become effective otherwise (N.J.S.A. 40A:12A-14).

STEP 4: Adopt & Implement Redevelopment Plan

- Rehabilitation begins with the adoption of a resolution declaring a "area in need of rehabilitation." The steps of implementation may include the development of a Redevelopment that includes provisions for rehabilitation for properties but excludes the power of eminent domain.
- Utilize various stakeholders in the process.

VII. Stakeholder Involvement

Getting various stakeholders involved is a crucial step to gaining consensus or input during both the redevelopment area investigation report and redevelopment plan processes.

Consult with a diverse group throughout the process such as:

1. Preparing entity should consult the following individuals in the process:
 - Planner(s).
 - Select members of municipal elected or appointed bodies (i.e. Governing Body, Planning and Zoning Boards, redevelopment authority or entity, etc.).
 - Chosen members of municipal departments (i.e. planning, public works, engineering, finance, housing, economic development, zoning officer, municipal clerk, tax assessor, building construction and subcode officials, etc.).
 - Citizen representatives such as community leaders, organization representatives, business owners, and residents with a strong interest in community planning and redevelopment that serves as a conduit between those preparing the report/plan and the community.
 - Redevelopment law counsel.

2. Planners, Governing Body and Planning Board to help keep the public involved



Critical groups to contact:

1. Redevelopment law counsel
2. Planner(s)
3. Governing Body
4. Tax Assessor
5. Planning department staff
6. Zoning officer / Building code official(s)
7. Citizen Representatives



Steps for public involvement:

- Learn about redevelopment and the process involved.
- Attend scheduled public hearings and workshops (if applicable).
- Submit comments to the municipality online, through workshop meetings, hearings, etc.
- Help publicize hearings on prospective redevelopment areas.

VIII. General Noticing Tips

For Redevelopment Area Investigation Reports or Redevelopment Plan Adoption:

- Must include date, time, place of hearing, and nature of matters to be considered.
- Identify the general boundaries of the area to be investigated for redevelopment. State that a map has been prepared and can be inspected in the office of the municipal clerk.
- Publish and mail notice (either municipal clerk or official of Planning Board). Advisable to keep affidavits of proof of service and publication notice on file.
- Though not required, it is often advisable to use certified mail for notices of public hearings for redevelopment.
- Use the most updated tax assessment records on file before a redevelopment area investigation report hearing to ensure that the most accurate address records are used for notices.
- Persons claiming an interest in redevelopment area parcels should be noted upon request within the tax assessment records to be noticed when appropriate and upon request.
- Ensure the proper specialized public notice requirements are satisfied for Redevelopment Area Investigation Report public hearings.
- If eminent domain is used for redevelopment implementation processes, ensure at the same time, that written notice is provided to property owners that does the following:
 - a) Alerts a property owner that his or her property has been designated by the municipal governing body for redevelopment.
 - b) Alerts the owner that designation operates as a finding of public purpose and authorizes the taking of the property against the owner's will that informs the owner of the time limits within which the owner may take legal action to challenge that designation.



IX. Demystifying Eminent Domain

The following section will help demystify some of the most common held misconceptions about this issue.

Some common misconceptions about eminent domain are:

1. Eminent domain is ALWAYS used in areas in need of redevelopment.
2. Just compensation is not needed when eminent domain is used.
3. Eminent domain can be used for areas in need of rehabilitation.

The above is NOT true.

Let us explore some of the reasons why this is the case. According to The Redevelopment Handbook, "in redevelopment scenarios, eminent domain is used to acquire land from one private property owner for the purpose of conveying it to a redeveloper." The Fifth Amendment to the United State Constitution provides that "private property [may not] be taken for public use without just compensation." The Fourteenth Amendment added the requirement of just compensation to state and local government takings. Eminent domain is sometimes used for the purpose of redevelopment and not for rehabilitation of an area.

Another common misconception about eminent domain is:

4. Eminent domain can be determined in any manner by a municipality and thus any property can qualify to undergo eminent domain.

The above is NOT true.

Municipalities are governed by enacted laws and legal decisions that shape how and when eminent domain can be used. According to the syllabus summary provided by the Cornell University Law School, the Supreme Court decision of *Kelo vs. New London* in 2005 supported the concept that local governments had the right to use the power of eminent domain for redevelopment purposes for not only public use but also "public purpose." Several recent redevelopment court cases in New Jersey have additionally defined redevelopment practices in the state. For example, in *Gallenthin Realty Development, Inc. v. Borough of Paulsboro*, decided by the New Jersey Supreme Court in 2007, court found that the "blight" redevelopment criteria found in the state's Local Redevelopment and Housing Law applies "only to property that has become stagnant because of issues of title, diversity of ownership or other similar conditions." This interpretation of the existing law has limited the ways in which municipalities can define redevelopment areas using this criteria rather than a definition of "not fully productive use." (Case # 1:2008cv01267)

Additionally, the redevelopment case of Harrison Redevelopment Agency v. DeRose of 2008 impacted how notice is conducted on property owners within a redevelopment area regarding eminent domain. "[The court] held that unless a municipality provides the property owner at the same time written notice that fairly alerts the owner that (1) his or her property has been designated for redevelopment, (2) the designation operates as a finding of public purpose and authorizes the municipality to acquire the property against the owner's will, and (3) informs the owner of the time limits within which the owner may take legal action to challenge that designation, an owner constitutionally preserves the right to contest the designation, by way of affirmative defense to an ensuing condemnation action. Absent such adequate notice, the owner's right to raise such defenses is preserved, even beyond forty-five days after the designation is adopted" (Docket No. A-0958-06T2 and A-0382-07T2)

IX. Demystifying Eminent Domain

Key Notes to Take Away:

- Eminent domain does not have to be employed within redevelopment areas nor is it required.
- Prospective redevelopers may negotiate or purchase property located within an adopted redevelopment area rather than have municipalities use eminent domain. However, if acquisition of particular parcels is needed that are not under the ownership control of the municipality or a redeveloper, then eminent domain may be a necessary tool to effectuate redevelopment.
- Eminent domain can not be used in areas declared "in need of rehabilitation." Rather, in this instance, rehabilitation standards and/or design guidelines are used to implement property rehabilitation within an area in need of rehabilitation.
- Eminent domain is NOT interchangeable with redevelopment. Just because you embark on redevelopment does not necessarily mean that eminent domain will be used.
- The usual process for providing just compensation through eminent domain includes passage of a resolution by the acquiring agency to take the property (condemnation), including a declaration of public need, followed by an appraisal, an offer, and then negotiation. If the owner is not satisfied, he/she may sue the governmental agency for a court's determination of just compensation. The government, however, becomes owner while a trial is pending if the amount of the offer is deposited in a trust account. Public uses include schools, streets and highways, parks, airports, dams, reservoirs, redevelopment, public housing, hospitals and public buildings."
- Where applicable or required, make sure to provide proper notice during the redevelopment process.

Note that amendments to Redevelopment Plans are common to undertake as needs or circumstances change within a redevelopment area or a community. The Governing Body is responsible for adopting all Redevelopment Plan amendments by final ordinance in the same manner in which the Redevelopment Plan was first adopted. The Redevelopment Plan shall supersede applicable provisions of the development regulations of a municipality or constitute an overlay zoning district within the redevelopment area (N.J.S.A.40A:12A-7). Amending Redevelopment Plans is another tool used by municipalities to help adjust redevelopment or rehabilitation planning to better meet market conditions and community characteristics over the long term. The Governing Body can amend the Redevelopment Plan.

The "redevelopment entity" is the designated agent responsible ONLY for implementation and administration of the Redevelopment Plan. Several redevelopment entity options available to municipalities include the following: Governing Body, local housing authority, county improvement authority or a redevelopment agency can serve in this capacity.

X. Highlights Recapped

- ☑ **The Governing Body authorizes the Planning Board to prepare an Area Investigation Report.** The Planning Board may prepare document or hire a staff planner or planning consultant to prepare the document on their behalf.
- ☑ **The Governing Body adopts Redevelopment Area Investigation Report and Redevelopment Plan.** The Governing Body may consider any Planning Board recommendations in adoption and approval.
- ☑ **Area must meet at least one of eight statutory redevelopment conditions criteria noted below to be declared an "area in need of redevelopment" under the New Jersey local Redevelopment and Housing Law:**
 - A: Deterioration
 - B: Abandoned Commercial or Industrial Buildings
 - C: Publicly Owned or Vacant Land for More Than 10 years
 - D: Obsolete Layout and Design
 - E: Underutilization
 - F: Fire and Natural Disasters
 - G: Urban Enterprise Zones
 - H: Consistency with Smart Growth Planning principles

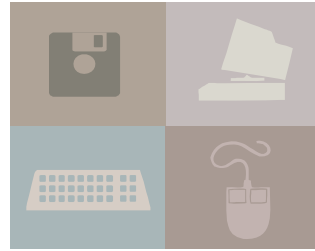
See N.J.S.40A:12A-5 for a full description of each criterion and its characteristics when developing an Area Investigation Report. Please refer to case law for appropriate use of this criterion.

- ☑ Thoroughly document how the study area meets each applicable redevelopment condition criteria found in the state Local Redevelopment and Housing Law. Become knowledgeable on relevant and current redevelopment case law and court decisions that impact procedures. Provide thorough notice to property owners where required.
- ☑ Keep the public and stakeholders involved and informed throughout the redevelopment process. Educate the public on redevelopment processes, requirements and rights of property owners concerning redevelopment notice and implementation.
- ☑ **Unique public notice is required for an Area Investigation Report but NO special public notice measures are necessary for a Redevelopment Plan beyond that which is required for ordinances that are adopted by a municipality.**
- ☑ Make sure to relate the Redevelopment Plan to the Municipal Master Plan, regional plans and the State Development and Redevelopment Plan.
- ☑ It is advisable to consult redevelopment legal counsel to navigate redevelopment processes.

XI. Additional Resources

ONLINE:

Publisher of New Jersey Law www.gannlaw.com
New Jersey Planning Officials. www.njpo.org
New Jersey Redevelopment Authority. www.njra.us
Redevelopment Law in New Jersey.
www.redevelopmentlaw.org/newjersey/newjersey.htm



BOOKS:

Cox, William, and Donald M. Ross.
New Jersey Zoning and Land Use Administration.
Newark, NJ: Gann Law Books, 2008.
(Published Annually - New Jersey Planning Officials).

The Redevelopment Handbook: A Guide to Rebuilding New Jersey's Communities.

Slachetka, Stan and David G. Roberts. 2003
(Available through NJ American Planning Association)

LAWS:

Local Redevelopment and Housing Law. N.J.S.A. 40:12A-1-22.
Open Public Meetings Act. N.J.S.A. 10:4-6 to 10:4-21 et. seq.



XII. Related Planning Terms Glossary

Redevelopment: Means clearance, replanning, development and redevelopment, the construction and provision for construction of any structure or improvement, the construction and provision for construction of residential, commercial, industrial, public or other structures and the grant or dedication of spaces may be appropriate or necessary in the interest of the general welfare for streets, parks and playgrounds or other public purposes, including recreational and other facilities incidental or appurtenant thereto, in accordance with a redevelopment plan (N.J.S.40A:12A-3).

Rehabilitation: Is an undertaking of extensive repair, reconstruction or renovation of existing structures, with or without the introduction of new construction or the enlargement of existing structures in any area that has been determined to be in need of rehabilitation or redevelopment, to eliminate substandard structural or housing conditions and arrest the deterioration of that area (N.J.S.40A:12A-3).

Redevelopment Area: Means an area determined to be in need of redevelopment pursuant to sections 5 and 6 of P.L.1992, c/79 (C.40A:12A-5 and 40A:12A-6) or determined heretofore to be a "blighted area" pursuant to P.L. 1949, c.187 (c.40:55-21.1 et seq.) repealed by this act, both determinations as made pursuant to the authority of Article VIII, Section III, paragraph 1 of the Constitution. A redevelopment area may include lands, buildings or improvements which of themselves are not detrimental to the public health, safety, or welfare, but the inclusion of which is found necessary, with or without change in their condition, for the effective redevelopment of the area which they are a part (N.J.S.40A:12A-3).

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