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Received  
MAY 11 2007

May 9, 2007

Eileen Swan, Executive Director  
New Jersey Highlands Council  
100 North Road Chester, New Jersey 07930

Re: Comments on Highlands Regional Master Plan, Township of  
Holland

Dear Ms. Swan:

These comments on the draft Highlands Regional Master Plan are  
submitted on behalf of the Township of Holland, Hunterdon County:

**1. Defunct Paper Mills at Warren Glen and Hughesville**

Holland Township officials have been having informal preliminary  
discussions with a potential buyer/developer of the Hughesville and Warren  
Glen paper mill sites. Both mills have abandoned all business activities  
and are now for sale by their current owners. Each lies along the  
Musconetcong River, which is also the boundary between Holland and  
Pohatcong Townships and Hunterdon  
and Warren Counties. The Warren Glen Mill is located in the Highlands  
Preservation Area; the Hughesville Mill is in the Planning Area. The  
mills are identified on the Holland Township Tax Map as Block 1, Lots  
1.01 and 1.02, and Block 2, Lot 1.01, encompassing roughly 160 acres  
(Warren Glen) and Block 2, Lot 1.02, and Block 4, Lot 1, encompassing  
roughly 168 acres (Hughesville), respectively. Each tract includes a  
small parcel of land in Pohatcong Township, on the other side of the  
Musconetcong River, as well.

The potential buyer/developer has expressed an interest in both mill  
sites, but has focused on the Hughesville Mill and the land on which  
it sits as having the greatest potential for additional development  
and redevelopment. He sees little potential for the

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Warren Glen Mill site, but is considering its purchase as a bargaining chip in future negotiations concerning the Hughesville Mill.

The potential for the redevelopment of one or both mill sites raises complex issues involving many agencies and levels of government. In view of the significance of redevelopment as a planning tool in the draft Highlands Regional Master Plan, we are calling your attention to the opportunities and issues associated with the two mill sites now.

The major issue that arises inevitably when a privately owned contaminated industrial site must be cleaned up in anticipation of future development or redevelopment is the economic viability of the undertaking. It is obvious from the outset that both environmental constraints and local sentiment militate against the level of development that may be needed to offset the costs of clean-up, acquisition and redevelopment. Economic issues loom large in the case of these two old mills, and we invite your attention to them at an early stage of the process. Without an economically viable solution, there will be no solution. If assistance can be made available to offset cleanup costs and promote responsible redevelopment of contaminated sites within the Highlands, it would be welcomed.

**2. Land Use Capability Map -Planned Community Overlay Zone(s)**

Although the Conservation and Protection Overlay Zones applicable to Holland Township seem generally to reflect the existing pattern of land uses, there is a large Planned Community Overlay Zone shown on the Land Use Capability Map that encompasses the Oak Hill Golf Course (Lot 6, Block 1.01) and active agricultural land (Block 6, Lot 1.02). These sites should not be part of any Planned Community Overlay Zone.

Recognizing that there are areas in the vicinity, and to the south, of the intersection of County Route 614 and Church Road

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that have significant environmental constraints, it is nevertheless requested that some of these areas be included in the Planned Community Overlay Zone with the proviso that any constrained areas will be protected and restored through the future development or redevelopment of the parcels they affect.

The "north hamlet" and "south hamlet" proposals that are featured in the Township's recent petition for Plan Endorsement to the Office of Smart Growth was the result of extensive public review and participation, the strong tenor of which demanded strict limits on the amount of land to be included in any kind of Center. It is recommended that both of these proposed hamlets be included in the Planned Community Overlay Zone.

There are two lots located just outside of the "north hamlet" that the Council may also wish to consider including in the Planned Community Overlay Zone. One of these, Block 6, Lot 61.01, is a residential property that is already connected to public sewerage. The other, Block 6, Lot 61.02, is owned by the Holland Township School and is being held in anticipation of a future expansion of the school's facilities.

Although Block 10, Lot 47, is 100 percent environmentally constrained, it has been included in the "north hamlet" for the express purpose of allowing it to be used to fulfill the "water budget requirements" in Holland's Land Use Ordinance for an inclusionary development proposed (and included in the Township's Interim Third Round Housing Element and Fair Share Plan) on Lot 61, Block 6, a site that is also located in the proposed "north hamlet". It is anticipated that through the development of Lot 61, Block 6, the entirety of Lot 47, Block 10, would be permanently preserved. If the Council does not believe it is necessary to include Lot 47, Block 10 in the Planned Community Overlay Zone in order to achieve this, it can be left out.

The "south hamlet" encompasses most of a tract identified on the Holland Township Tax Map as Block 24, Lots 3 and 13. There is a long-standing proposal for the development of this tract. This development will provide for various forms of age-restricted

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housing, including some affordable units, as well as a number of commercial uses. It has been zoned for this purpose for several years and is an important component of the Township's second round Housing Element and Fair Share Plan that was certified by COAH. A large single-family residence occupies the portion of this property that lies outside of the "south hamlet". Phase I of the development, consisting of 44 residential units and, possibly, a group home site, has received both preliminary and final approval from the Planning Board. The applicant has already received a number of permits from the NJDEP and is currently awaiting approval of the Township's Waste Water Management Plan so that he can obtain the sewer connection permit from the NJDEP that he needs to proceed.

### **3. The Landscape Project and Critical Habitat**

Holland Township favors habitat preservation and sets a high value on the information that has been gathered into the Landscape Project. However, the data and models that are being used to define the mapped extent of critical habitats by the NJDEP and in the draft Highlands Regional Master Plan do not always justify the labeling of an area as "critical habitat". Although there is value in identifying potential critical habitat for land use planning purposes, a good deal of agricultural land has been labeled as "critical grassland habitat", including currently tilled fields, horse paddocks and regularly mown hayfields.

Recently, NJDEP's Division of Watershed Management has balked at including lands in Holland Township's sewer service area that are marked as "critical habitat" for the wood turtle. Examination of the lands in question and review of the model used to mark the wood turtle habitat reveals that substantial portions of the marked area are not critical or even useful for wood turtle habitat. Further, there are other large tracts in Holland Township suitable for wood turtle habitat that have not been so marked in the shapefile, presumably because there have been no officially recorded sightings of the species nearby. It is

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obvious from site specific observations that wood turtles are occupying other areas in addition to those where sightings have been reported.

For these reasons, Holland requests that the Council use care and caution in applying landscape level data and Landscape Project habitat information in the parcel-by-parcel assessment and regulation of land uses and development.

#### **4. Smart Growth - Use of Alternate Sewage Treatment Systems**

An important and relevant component of Smart Growth in rural areas is creating opportunities to cluster permitted residential development on a small percentage of a large tract of land, leaving as much as 80 percent of the tract available for continued agricultural use or for conservation open space. This is a concept that is not only intuitively appealing, but one that is essential to the preservation of privately owned land located in the Conservation and Protection Overlay Zones throughout the Highlands region.

Most of the land in Holland Township is served by individual septic systems, and most of the soils in the Township are not well-suited for subsurface disposal. Moreover, NJDEP's preliminary determination of appropriate septic densities for the Highlands region calls for the creation of very large lots (20 acres or more for one residence in a mixed use area). This approach to development seems like a colossal waste of land resources. Neither the NJDEP nor the Highlands Council has indicated whether any alternative types of sewage disposal systems, which would facilitate the kind of intense clustering needed to conserve land, are going to be considered. Clustering of residences in Holland and in other municipalities, both within the Highlands region and outside of it, will depend on the availability of suitable alternative wastewater disposal systems. A policy promoting, and guidelines for, the use of such systems should be a significant part of the Highlands Regional Master Plan.

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## **5. Plan Conformance Grants**

Grants to municipalities to achieve Plan Conformance with the Highlands Regional Master Plan are currently available only to towns that are located either wholly within the Highlands Preservation Area or partly within the Highlands Preservation Area and partly within the Planning Area, but in the latter case, only after the town has committed to opting in to the Highlands Council's jurisdiction within its Planning Area. It is respectfully urged that Plan Conformance Grant money also be made available to communities that are located partly within the Preservation Area and partly within the Planning Area BEFORE they are required to commit to opting in.

The issues of Plan Conformance, especially the initial decision as to whether or not to opt in to the Highlands Regional Master Plan within the Planning Area, will be particularly complex for municipalities that straddle the Preservation Area/Planning Area boundary. Plan Conformance Grants should be available to such communities at the outset, rather than after they have opted in, to enable them to undertake the time-consuming and expensive process of reviewing and exploring the benefits of opting in to the Highlands before they commit to doing so.

It is certainly conceivable that Holland Township will have other responses to the Highlands Regional Master Plan as time goes by and our discussions with the Council's staff continue. If so, we would like to be able to supplement the comments contained in this letter. Thank you for your consideration.

Very truly yours,

Elizabeth C. McKenzie, AICP, PP

cc: The Honorable Bernard O'Brien, Mayor  
Dr. Peter Craig, Planning Board Chairman  
Catherine Miller, RMC, Township Clerk  
Betty Ann Bechtold, Planning Board Secretary

**Corresponding  
Documents in  
Admin. Area**