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**LIEBERMAN & BLECHER**  
**ENVIRONMENTAL LEGAL COUNSEL**

**NEWS RELEASE**

**FOR IMMEDIATE RELEASE**

**Citizens Group Demands That Planning Board Not Hear 15 Home Proposal**

A hearing before the Holland Township Planning Board scheduled for August 12, 2002 should be cancelled because it lacks legally required information, according to a local citizens group.

The group opposing the hearing, called Friends of Holland Highlands, sent a letter to the Holland Township Planning Board that is attached to this press release. The hearing concerns a fifteen unit (formerly sixteen unit) subdivision housing proposal on the Musconetcong Mountain, on Shire Road in Holland Township.

According to Stuart Lieberman of Princeton's Lieberman & Blecher, a firm that has represented this group concerning this project, "The Planning Board's own regulations require a completed County application before the matter can be heard. The County has rejected the applicant's proposal, which means that this requirement has clearly not been satisfied."

Lieberman says that the County application is very important for many reasons. For example, it will include a much-needed traffic study that the group considers to be important in light of numerous traffic accidents on the mountain road approaching the proposed subdivision.

Furthermore, the County application will also require details concerning a proposed bridge expansion, necessary only to accommodate the entrance to the proposed development, all of which the Planning Board currently does not have.

According to Lieberman, "It would be arbitrary, capricious and unreasonable for the Board to continue this hearing process without having this information. We believe that this application must be deemed incomplete, and that the appropriate action is for the applicant to start the process anew after the applicant has made the legally required submissions."

This dangerous, outstanding traffic issue compounds the numerous additional problems involving environmental sensitivity, water limitations, endangered species impacts and historical impacts that exist and have been discussed by the group and presented to the Planning Board.

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Lieberman & Blecher practices environmental law and represents government entities, citizen groups and companies in New Jersey and the Tri-State Area. Its web address is [www.liebermanblecher.com](http://www.liebermanblecher.com). Contact Stuart Lieberman or Nicole Mikulas for additional information. Their phone number is 732-355-1311.