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To: New Jersey Highlands Water Protection and Planning Council

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From: Erica Van Auken, Campaign and Grassroots Coordinator, NJ Highlands Coalition

*Township of Oxford Petition of Plan Conformance*

The New Jersey Highlands Coalition supports Oxford Township's petition for plan conformance. We have concerns regarding the environmental constraints within the Township's proposed center designation. We recognize that the proposed center is entirely in the planning area and within an Existing Community Zone and Existing Community Environmentally Constrained Subzones, also including part of a parcel in the Conservation Environmentally Constrained Subzone.

We support the inventory that has been made of environmentally constrained areas within the Center that will be protected as a condition of the Center Designation. A further condition of both the Center Designation and Municipal Conformance must also include the implementation of a Water Use and Conservation Plan that addresses the deficit of available water within the entirety of the subwatershed. We support the development of a Habitat & Conservation Management Plan to mitigate the impacts of development within the proposed center.

We understand the careful effort to minimize impacts to 14 acres of critical habitat in the proposed center through a site-specific habitat analysis. However, the disturbances and impacts to the sensitive ecology here can never be mitigated by preserving a parcel elsewhere. The functional value of these forests and wetlands, the open water buffers and its proximity to wellheads cannot be summed and exchanged. Instead, the Center should be planned in such a way that these values are maintained where they currently exist.

We thank the Highlands Council for this opportunity to submit comments.