March 24, 2015

Mayor Dunleavy and Borough Council Members
Borough of Bloomingdale
101 Hamburg Turnpike
Bloomingdale, NJ 07040

Dear Mayor and Borough Council Members:

The challenges to municipalities in New Jersey today are great. The combination of a State imposed cap on property taxes, high retail and commercial vacancy rates and residential foreclosure rates, and the increase in successful tax appeals have placed unprecedented pressures on local decision makers who are struggling to maintain the quality and level of municipal services for their residents. We are gravely concerned that under the pressure of such circumstances municipal leaders would contemplate as a solution to short term fiscal troubles accommodations of land uses that irreversibly destroy the natural resources that provide the most valuable ecological services to the community and that the long term economic stability of the community and region depend upon. We are even more troubled when such measures completely reverse a municipality’s well-documented understanding of the valuable services provided by the natural resources within its borders and an ethos of promoting their protection. Sadly, this appears to be the case with the recent effort in Bloomingdale to adopt a quarry overlay zone for the undeveloped and unprotected Meer tract on Federal Hill, abandoning the community’s longstanding support for its preservation in order to accommodate the interests of Tilcon and expand its quarrying operation.

The average citizen may not readily discern the value of the ecological services provided in the forests, soils, wetlands and the other natural resources of Federal Hill in its current undisturbed condition. But as municipal elected officials you had commissioned natural resource inventories and measured their values and calculated the risks if Federal Hill were further developed. You adopted the findings of these investigations as policies to guide land use decisions in Bloomingdale. Official recognition of the resource values of Federal Hill began in 1989 when Bloomingdale petitioned the State Planning Commission to re-designate Federal Hill on the State Plan Policy Map from PA-2 (suburban planning area) to PA-5 (environmentally sensitive planning area). This recognition was expanded upon and further mapped and evaluated in the continuing planning processes of the Borough and in submissions to the Passaic County Office of Planning and to the New Jersey Highlands Council.
Then in June, 2014, with the adoption of a Periodic Reexamination of the Master Plan, the preservation of the Meer tract, was claimed to be “not feasible”. This claim became the basis for a proposed quarry overlay zone that would allow Tilcon to expand its quarrying operation into lands for which, for the past 25 years, Bloomingdale built a case against development and called for its preservation.

The New Jersey Highlands Coalition represents the common interests of our 80 member organizations in advocating for the protection of the natural and cultural resources of the New Jersey Highlands. We are deeply concerned and troubled by your abrupt change of course and the threat this change presents to a unique natural area of the Highlands.

Although the Reexamination document responds to criteria set forth in the Municipal Land Use Law, the responses are perfunctory. The Reexamination document fails to consider the resources at risk and the impacts and potential costs if quarrying were allowed on the Meer and tract. By ignoring the Borough’s cumulative research over the past 25 years in understanding the resource values of Federal Hill, the Reexamination fails to make an honest cost benefit analysis of the recommended zoning change.

Without a complete and faithful accounting of the resources put at risk, the extent of potential adverse impacts and the value of lost services to compare against a realistic projection of revenues generated from the proposed new land use, we caution the Borough and its residents and urge you not to move forward with this plan. The pressures on you to respond to today’s fiscal challenges are great. We have no doubts that your intentions are in the best interests of those who elected you. But please do not act in the haste that is clearly in evidence. There is too much at stake.

Respectfully,

Elliott Ruga, Senior Policy Analyst
New Jersey Highlands Coalition