



NEW JERSEY HIGHLANDS COALITION

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November 8, 2019

Acting Commissioner Diane Gutierrez-Scaccetti
NJ Dept. of Transportation
PO Box 600
Trenton, NJ 08625

YOUR WATER YOUR FUTURE

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RE: I-80 Rockfall Mitigation Project

Dear Commissioner Gutierrez-Scaccetti:

The New Jersey Highlands Coalition was formed in 1988 and incorporated in 2005 as a charitable non-profit. We represent the interests of our 103 member organizations in the protection of the natural and cultural resources of the federally designated special resource region, the New Jersey Highlands.

We are writing to register our opposition to this project early, before any formal public comment session commences, because by that time the project will have achieved a momentum that is near impossible to stop, no matter the level of opposition, or the thoughtfulness of the comments.

I understand that we are far from being alone in the conviction that this project is misguided. I am aware that among officials there is near unanimous opposition: Congressman Gottheimer; State legislators Senator Oroho, Assemblymen Hal Wirths and Parker Space; the Warren County representative on the NJTPA, Freeholder Jason Sarnoski; Knowlton Township Mayor Adele Starrs; Hardwick Township Mayor Kevin Duffy; the management of the Delaware Water Gap National Recreation Area; a similar majority of elected officials in Pennsylvania; and numerous organizations; and hundreds, if not thousands of concerned residents in the affected communities and beyond, have expressed their opposition to the project. Yet the Department appears to be charging forward to blanket one of the region's most iconic vistas and world class geological landmarks with fencing. In fact, the Delaware Water Gap National Recreation Area and Middle Delaware Scenic and Recreational River Foundation Document, issued in 2014 by the National Parks Service, to guide planning and management decisions in the Park, identifies the "Striking Geological Feature" of the Water Gap, as one of the Park's fundamental resources and lists as the primary threat the "installation of a wire mesh fence to stop rockfall along the gap."

I also understand that the safety issues the project is intended to address are overstated and that requests by the Knowlton Township mayor for the Department to provide the data to support the need for such a disruptive and destructive intervention have been ignored.

With the level of opposition to this project as broad as it is, and with the Department's apparent lack of candor about the project's necessity, we can't help but wonder why this project is moving forward. Additionally, the Department is dismissive of the project's potential environmental and cultural resource impacts. In its Concept Development Report, it recognizes that the project will disturb rare wetlands communities and the fact that the project is within a Natural Heritages Priority Site, which indicates the presence of rare plants. It also acknowledges the presence of several threatened and endangered animal species. Yet, as part of the required NEPA review process, the project will undertake an Environmental Assessment instead of the more rigorous Environmental Impact Statement.

When at its best, the New Jersey Department of Transportation incorporates the principles of Context Sensitive Design in its projects, so that the community's unique character is preserved, or enhanced as a consequence of a project. The I-80 Rockfall Mitigation Project will accomplish the opposite. It is as insensitive as, say, erecting a celltower on the top of Grand Teton. You just don't do that. For the very same reason, NJDOT should not move forward with this project.

Sincerely,

A handwritten signature in blue ink that reads "Julia Somers". The signature is fluid and cursive, with a checkmark-like flourish at the beginning.

Julia Somers, Executive Director

Cc: Mayor Adele Starrs, Knowlton
Mayor Patrick Duffy, Hardwick
John H. Miller, P.E., Federal Highway Administration
Governor Philip D. Murphy
US Senator Cory Booker
US Congressman Josh Gottheimer
NJ Senator Steven Oroho
NJ Assemblyman Parker Space
NJ Assemblyman Hal Wirths