



NEW JERSEY HIGHLANDS COALITION

508 Main St. • Boonton, NJ 07005 • www.njhighlandscoalition.org

Jim Hutzelmann, Water Resources Engineer
New Jersey Highlands Council
100 North Road
Chester, NJ 07930
jim.hutzelmann@highlands.state.nj.us

March 31, 2010

Re: Proposed Highlands Redevelopment Area Designation, Heath Village Retirement Community, Washington Township, Morris County

Dear Mr. Hutzelmann,

The New Jersey Highlands Coalition is very pleased that the Council worked with the applicant to ensure that this project would have the least impact possible, remain consistent with the Regional Master Plan, and would include the deed restriction of the forested steep slopes on the property.

However the Coalition is concerned that a mitigation plan to address the impacts to Highlands Open Water buffers and associated wetlands by the construction of "Building D" is not being considered as part of this redevelopment area application. This mitigation plan should be made available to the public and the Highlands Council before the project is approved to ensure that impacts to those resources will be minimized and mitigated correctly and to the maximum extent possible. This mitigation plan must also include a component on stormwater management on site as the runoff created by this new construction will not be recharged according to the staff recommendations.

Also, the Coalition is concerned as increased water use is proposed in a sub-watershed that is in a Current Deficit Area. The applicant has provided information to the Council about how it plans to address these impacts by channelizing rooftop runoff into recharge basins to mitigate for 125% of increased consumptive use. The Coalition would like the information or model for calculating the mitigation of the increased water usage on site made available to the public. Understanding how these calculations to reach 125% recharge were made and what model is being utilized by the Council will be important in analyzing future projects that come before the Council. Also this mitigation component should be finalized before the project moves forward and the applicant should determine if they will use recharge basins, enhance riparian corridors, or retrofit the detention basin to ensure their increased consumptive water use is addressed in a Current Deficit Area.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink that reads "Julia Somers".

Julia Somers, Executive Director