

Dear Executive Director Spinelli and the Highlands Council,

The New Jersey Highlands Coalition opposes the proposed expansion of the Highlands Designated Center in Alpha Borough, as it is inconsistent with the goals and objectives of the Highlands Regional Master Plan to protect water and other natural resources of the Highlands Region, and because it would result in the loss of Highlands resources, including important farmland soils, active agricultural fields and sensitive environmental resources.

Our biggest issue with the proposed expansion is the development of block 100.01, lot 10. This lot, located east of I-78, is located in the Conservation Zone and Conservation-Environmentally Constrained Sub-Zone. It also contains Important Farmland Soils, and the entire area is underlain by karst topography.

Although the Center Designation does not require a site plan at this time, based on the current industrial zoning and informal proposals, we expect the Alpha Center expansion to accommodate a series of warehouses. Combining the recently built warehouse at the former Ingersoll Rand site and the warehouses that are anticipated at the adjacent Lopatcong Township and Pohatcong Township Center expansions, the multiple warehouses in the combined 3 Centers and the 3 Center expansions will result in a super complex of warehouses that will have tremendous negative impacts on the health and quality of life in surrounding residential areas. The cumulative impacts of these warehouses must be accounted for and understood before any additional Center expansions can be approved.

In contrast to proposed Lopatcong and Pohatcong center boundary expansions, which are primarily infill developments, the parcel in Alpha on block 100.01 lot 10 is not infill, but a sprawl development into an established, active agricultural landscape with many preserved farms, including an expansion of a sewer service area. These impacts include reduced water availability, less agricultural land to meet NJ's food needs, increases to impervious surfaces linked with increased flood risk and water intrusion in sinkhole-prone karst topography, generating more commercial traffic, which the region is unprepared to address, and causing excessive light and noise pollution along with a host of other issues.

Alpha has stated an expected utilization of 83,508 GPD of wastewater treatment, and 84,000 GPD of water use. The Alpha Center expansion is within a HUC14 that is currently in deficit. The wastewater will be conveyed to the Phillipsburg STP, which discharges to the Delaware River, resulting in an interbasin transfer and a consumptive and depletive use that will exacerbate the existing water deficit.

Alpha Borough is a non-conforming municipality. The grant funding and other benefits associated with the enhanced land use planning tools and flexibility should not be conferred to a town that chooses not to fully conform to the Highlands RMP.

The New Jersey Highlands Coalition commends the Council's support of bills S3356 and A4475 which attempt a more regional approach to warehouse siting, and for which we are advocating for amendments that would require the regional authority to address the regionwide impacts of warehouses in the Highlands region. In the Highlands region, that authority must be the Highlands Council, and the council must take a firm stance on warehouse projects that cause impacts not only to the municipality in which they are sited, but throughout the region and New Jersey as a whole. The Highlands – of which Alpha is a part - provide drinking water for 70% of the state's residents. We must not allow that finite resource to put at risk.

Thank you for your time.

Respectfully,

Dylan Medici