

New Jersey Highlands Council
Chester, NJ

February 8, 2024

Public Comments re: Land Use Capability Zone Map Adjustments

Dear Executive Director Spinelli and Councilmembers,

I would like to commend the Council and its staff for undertaking the difficult task of updating the RMP. Much has changed in that time. By and large, the updates to the LUCZ Map reflect the on-the-ground realities facing the most densely populated state in the nation, and the methodology does a good job of distilling complex factors that define the essential character of the Highlands Region.

However, a shortcoming of the documentation supporting the 2024 update is the lack of any insight on the policy implications of the large-scale changes in Land Use Capability designations. For instance, there is a loss of a significant amount of existing community environmentally constrained sub-zone lands. These areas, which consist of significant environmental features within existing communities, are those which are most threatened by development, and which are most needed to preserve scarce habitat within developed areas. The 2024 LUCZ update loses about 16,000 acres of ECZ-ECs in developed communities. Some of these lands are absorbed into the Protection Zone, but some have been lumped into ECZs, which are not protected from further development. There is no explanation why so many acres have changed in their designation and what that could mean in both loss of and enhanced development opportunities.

Further, when looking at the wildlife management area sub-zone, it begs the question of why WMAs and National Wildlife Refuges are included in the assessment, but not state parks or forests or Green Acres land. This is not a change in the current proposal, but in reviewing the original LUCZ Technical Report, which underlies the 2024 update, this remains an unanswered question.

Respectfully submitted,

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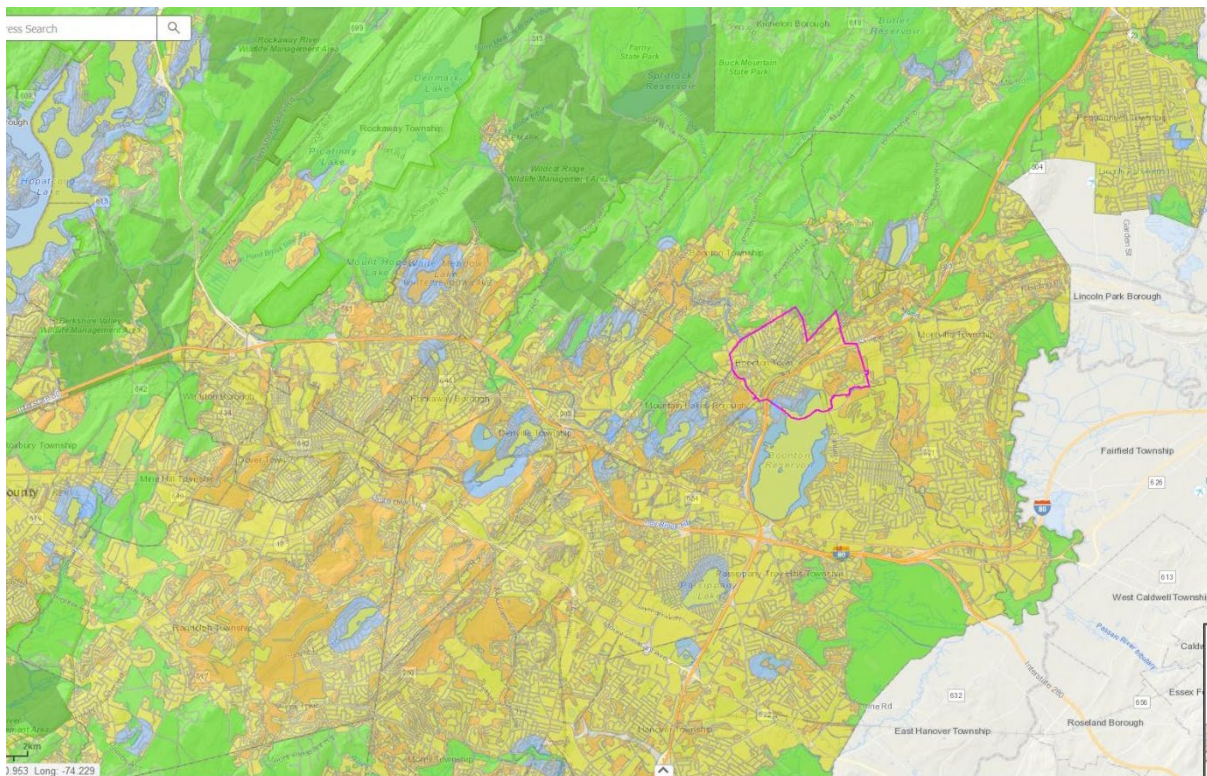


Fig 1. 2008 LUCZ Map showing Existing Community Environmentally Constrained Sub-Zones (in orange) surrounding Boonton Town.

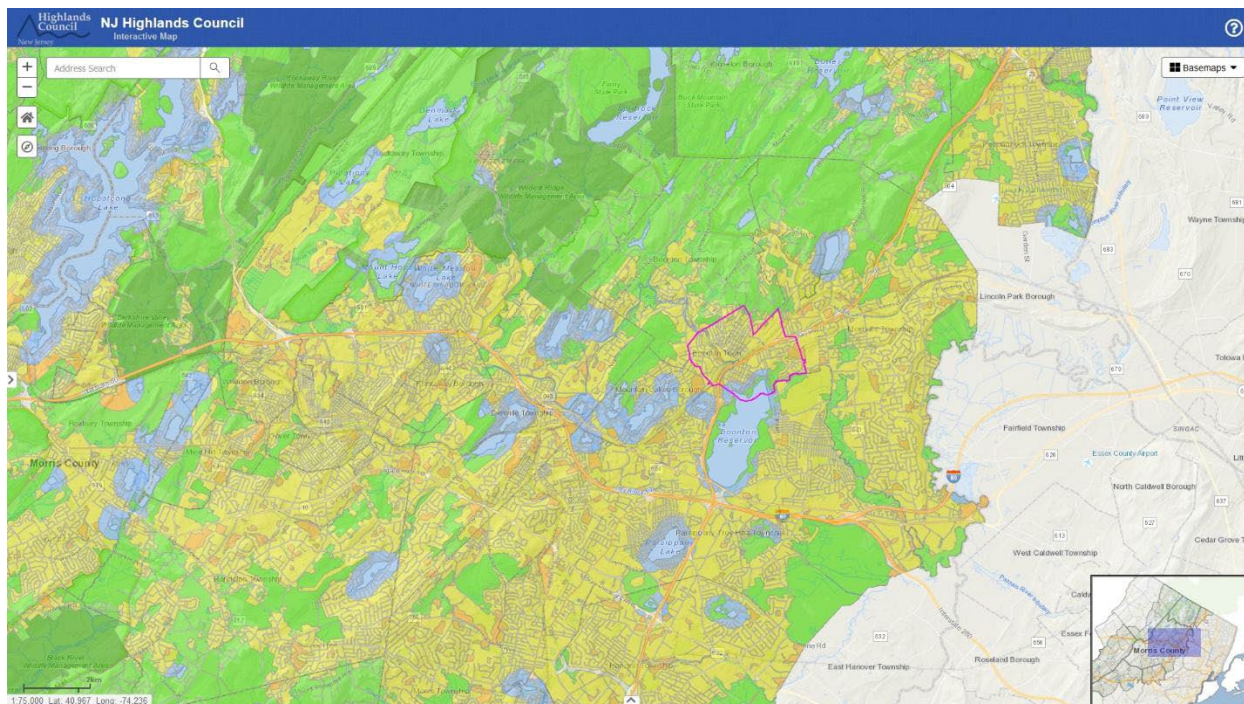


Fig 2. 2024 LUCZ Map showing Existing Community Environmentally Constrained Sub-Zones (in orange) surrounding Boonton Town. Some of these ECZ-ECs are consolidated into Protection Zones, but many are absorbed by ECZs.