

**Musconetcong Advisory Committee (MAC), Susan Dickey, Chair
January 24, 2005**

David Dech, Planning Director
Warren County

I have read the latest proposed cross acceptance report and am submitting comments on behalf of the MAC for inclusion therein.

The recommendation in the report to consolidate planning areas to eliminate the environmentally sensitive planning area designations is inconsistent with the intent of the plan and other report recommendations. From the inception of a State Plan for Growth and Redevelopment in 1988, environmentally sensitive areas have had their own designation for obvious reasons – to protect the remaining natural resources from overdevelopment, degradation and contamination due to suburban sprawl. The very fact that these areas of critical environmental concern have a separate and different designation gives pause for consideration in the development process. Combining the environmentally sensitive areas into a general “rural” planning area sends a message that they are not “special” and no additional consideration need be given to developing the area – a view contrary to all conservation actions taken by Warren County and its municipalities since 1993.

Warren County planning area PA 4B Rural/Environmentally Sensitive contains 82,447 acres or 35.76% of the county and planning area PA 5 Environmentally Sensitive contains 70,171 acres or 30.43% of the county or a total of 152,618 acres and 66.19% of the county. These areas were designated environmentally sensitive for good reason. They are the home to trout production waters, category one watersheds, endangered and threatened species and plants. A good deal of these acres are in prime soils and are aquifer recharge areas supplying drinking water to local individual domestic wells as well as water companies. In fact, the report recommends these aquifer recharge areas should be mapped and afforded a special designation on the SDRP Policy Map identifying them as priority protection areas within the Highlands region. The report goes on to recommend that policies should be adopted to protect undeveloped aquifer recharge areas and limit impervious coverage to the maximum extent achievable. Local governments should plan for the protection of drinking water, whether or not a problem exists.

The MAC requests that Warren County withdraw the recommendation of combining environmentally sensitive planning areas into one “rural” planning area. State policy has long protected environmentally sensitive areas with regulations, guidelines and funds. Suggesting that any critical environmental area is no longer sensitive or worthy of extra consideration, sends the wrong message to the development community. The goal of the NJDEP Strategic Plan 1998-2001 was fishable, swimmable New Jersey rivers and lakes that support healthy ecosystems and clean sources of water from surface and ground supplies. The first line of defense against contamination of our water supply is the designation of environmentally sensitive on a map or in a report.

Mansfield Township has requested that the Musconetcong valley area of the Township, currently designated as Planning Area 4B be changed to Planning Area 4 based upon similar physical features in White and Hope Townships. However, White and Hope Townships are in a regional sewer agreement under the Pequest River Municipal Utilities Authority (PRMUA) whereas only a small portion of Mansfield Township has potential sewer availability through the Hackettstown Municipal Utilities Authority (HMUA). The Musconetcong River valley PA4B planning area is **not included** in the sewer area of Mansfield Township and investments by the State and NJDEP regulatory actions do not support expanding the sewer area to the Musconetcong River valley.

Mansfield also expresses fear of a diminished tax base, classifying itself as a “bedroom” municipality. However, by downgrading the planning area and removing the protections of an environmentally sensitive planning area, Mansfield is not only courting additional residential growth, but encouraging it.

Mansfield Township has supported the protection of the Musconetcong River and the Wild and Scenic designation submission to Congress through municipal resolutions for several years. The entire length of the Musconetcong River running through Mansfield has been nominated for inclusion in the Wild and Scenic designation. Mansfield also supports farmland preservation and has a municipal open space tax for the purchase of township farms, many of which are located in the Musconetcong valley.

The MAC opposes the request of Mansfield Township to change the Musconetcong valley area of the township to a planning area 4 because of the critical and environmental sensitivity of the valley and the river corridor and the possibility of Mansfield Township being forced to accept unwanted growth in this critically environmental area in the future.

The composite map of selected environmental features of Mansfield Township shows the areas along the Musconetcong River and valley consist of prime agricultural soils, critical areas including slopes greater than 15%, wetlands and floodplains and state endangered species. The Musconetcong watershed comprises about 1/6 of the New Jersey Highlands region.

Carbonate and shale rocks underlay the river valley floor from Hackettstown to Rieglesville. This highly soluble limestone bedrock, or karst, results in sinkholes, depressions, caves and irregular bedrock surfaces throughout the watershed and valley. The fractures and solution channels in these karst areas provide a direct connection between land surfaces and groundwater, greatly increasing the potential for groundwater contamination. Sinkholes threaten human safety and man-made structures, businesses, roads and utilities. Actual collapse can occur in minutes, leaving large holes as deep as 50 feet. Land use activities such as roadway vibrations, leaking culverts and water lines, stormwater disposal into dry wells and underground mining can accelerate the formation of sinkholes. These limestone formations should be identified and protection of the formations incorporated into a municipal master plan. Conservation and pollution prevention practices that will minimize groundwater contamination should be encouraged. It's important to understand the geology of an area when considering how the land will be used.

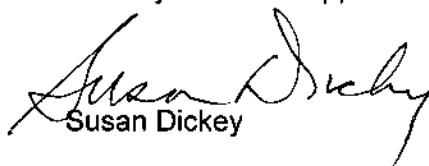
The State Geological Survey identifies the glacial outwash deposits found in the upper valley as an important medium for storing and recharging water to the underlying bedrock aquifers. Groundwater withdrawals through overdevelopment can seriously impact area residential wells.

Mansfield Township describes the existing 7,150 acre rural environmentally sensitive planning area as consisting of 3,663 acres in agriculture, 1,559 acres in forest, 403 acres in wetlands, 55 acres in water, 111 acres barren and only 1,359 acres developed.

Section 11 of the Highlands Act requires that special critical environmental areas and critical natural resource lands should be identified and development limited in those areas. The resource assessment should maintain ecological values, with special reference to surface and ground water quality and supply; contiguous forests and woodlands, endangered and threatened animals, plants and biotic communities; ecological factors relating to the protection and enhancement of agricultural activity and air quality.

The study of the river done in the process of the Wild and Scenic designation confirms the river corridor meets the goals of the resource assessment guidelines of the Act.

Thank you for this opportunity to be a part of the planning process of cross acceptance.


Susan Dickey