

Comment #1

From: Georgia Zambas

Sent: Thursday, February 22, 2024 7:39 AM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Proposed development in the areawide Water Quality Management Plan. Block Lot(s) Municipality 102 9 and 9.01 Lopatcong Township 1 1 and 1.01 Pohatcong Township

To Whom It May Concern,

Please consider denying development of the parcel identified above for a warehouse. The land is located between two residential neighborhoods and has a stream in it. Both of these factors are counter to the proposed use of the land.

Allowing development of the land under a redevelopment rule should not be allowed as this land was reserved as open space and water management for development of the adjacent parcel which is the former Phillipsburg Mall.

This land should remain open space for the benefit of the residents, to manage stormwater events and to provide a buffer to the redevelopment of the adjacent properties.

Thank you for your consideration,

Georgia Zambas

Lopatcong Township Resident

Comment #2

From: Sarah Hare

Sent: Wednesday, February 21, 2024 2:32 PM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] RE: Highlands Redevelopment Area Comments-Lopatcong/Pohatcong

To: New Jersey Highlands Council, 100 North Road, Chester, NJ 07930

From: Sarah Hare, Hope, NJ Resident, Hope EC Member & active member of Citizens for Sustainable Development

Re: Highlands Redevelopment Area Comments about a request for revision to the WQMP for public wastewater service to be provided for Block 102, Lots 9 & 9.01 in Lopatcong Township and Block 1, Lots 1 & 1.01 in Pohatcong Township.

I strongly oppose any revision to the Water Quality Management Plan to provide sewer service for this Lopatcong/Pohatcong warehouse development because:

*What is the point of a Water Quality Management Plan in a conforming Planning Area if all one needs to do is to make revisions in that plan that will, in turn, increase the probability that the nearby Lopatcong Creek and Watershed will receive and be harmed by polluted stormwater/sewer run-off. It is hard to understand that this development is a “necessary and justifiable social or economic development” as is required by the July 2023 NJ Surface Water Quality Standards https://dep.nj.gov/wp-content/uploads/rules/rules/njac7_9b.pdf.

*No buffer system of a public wastewater system is ever able to prevent 100% of the polluted water from running into nearby soil and waterways.

*The land that this development would rest upon is carbonate rock, aka karst. That land/soil is porous. So, any public wastewater system is going to end up releasing some polluted water into the soil that will make its way to other waterways in the area including Category 1 (as you know, the highest level of ecological sensitivity in NJ) Lopatcong Creek.

*The Lopatcong Creek Watershed will be more susceptible to flooding with one more warehouse (in addition to the Phillipsburg Mall warehouse) built so close to it. Any runoff from this development will be affected by and mixed with floodwaters. There is no way to predict where this floodwater will end up and how it will harm the nearby residents and the Delaware River tributaries. There is strong evidence that impervious surface contributes to flooding. Please see link. (<https://eros.usgs.gov/earthshots/impervious-surface-0#:~:text=On%20these%20surfaces%2C%20rainfall%20does,more%20vulnerable%20to%20flash%20floods>). And as a sub-watershed area of the Cat. 1 Lopatcong Creek, this land should have no more than 10% impervious surface. (https://dep.nj.gov/wp-content/uploads/rules/rules/njac7_9b.pdf)

The abovementioned reasons seem to me to be enough for a denial of this revision, but please allow me to make one additional comment that puts this development in a regional context. The designation of this property from the start is suspicious. Why is farmland BEHIND the Phillipsburg Mall that is not developed able to be designated a “Redevelopment” Area when it does not now contain development? That appears to be a ploy to give developers an advantage. Why would the Council agree to that if its mission is to protect Highlands waterways and wildlife habitats? This concern opens the door to the awareness that throughout Warren County there is an invasion of warehouses, all because of zoning that gives developers the power to do what they want without putting the environmental threats of their developments in the forefront. As of now, numerous warehouses are being approved and in the application process throughout Warren County in addition to those that already exist. A 350,000sf warehouse was just approved in Belvidere overlooking the Pequest River that will involve the cutting of 29 acres of forest. That’s all sensitive wildlife habitat and a crucial waterway that flows into the Delaware. There’s a 70,000 sf warehouse next to an active bald eagle’s nest very near the Paulinskill River in Blairstown that was just approved (with conditions). There’s the Howard St. 328,000sf warehouse/storage facility planned for right next to the Delaware River in Phillipsburg. No, these are not specifically related to this

property & warehouse development, but all of these developments are either in the Highlands Watershed or very close to it. All of them involve tributaries to the Delaware or the Delaware itself. I implore you to view this development in the context of the many in a regional manner in addition to the harms a change in the WQMP will do to the quality of the Lopatcong Creek Watershed. Waterways and wildlife do not know from where their lifeblood creek and river water comes. We hold the profound responsibility to make decisions that save & protect them. Will you?

Thank you for your sincere consideration of my comments.

Comment #3

From: rattrakk

Sent: Monday, February 12, 2024 4:56 PM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Highlands act environmental concerns

Hello

My name is REDACTED and I live directly across from the pohatcong area of the highlands project. My concerns are about the animal's that have made this area their home. For the past 27 years that I have resided here, Canadian geese have made a stop in the corn fields between the months of November - February. Coyotes and foxes , deer and endangered marsh turtles have resided here. How are we going to be able to accommodate them ?

Comment #4

From: Wade, Shaun L

Sent: Thursday, February 8, 2024 12:08 AM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Warehouse in Lopatcong

I am writing this email to oppose the new warehouse being built at block 102 lots 9 and 9.01 in Lopatcong and any other warehouse proposed in the area. Our area has been littered with these new warehouses and our roads have been taken over with trucks. The trucks are driving all over our local roads and putting our kids in danger. Just yesterday I was picking my son up from wrestling at the elementary school in Lopatcong and here comes and 18-wheeler driving not only down a small side road at the school but going the wrong way through DO NOT ENTER signs. This is and everyday problem now with these trucks in our

town and adding more unnecessary warehouses to our town is only going to make matters worse.

Aside from the truck issues the warehouses pose a huge risk to our local volunteer fire departments. As a member of the local fire department, I know firsthand that our departments are not equipped to fight a fire in such big warehouses. The manpower to fight such a fire will stretch all our local departments to the max which in return will put our local taxpayers at risk if something may happen at the same time.

I am no environmentalist, but I am sure that all the added truck traffic and space these warehouses take up will not be good for environment and all the harm it will do to the animals in the area. Please stop and think of the residents who must deal with these warehouses and all the negative they bring with them.

Thank you.

Respectfully,

Shaun Wade

[REDACTED]

Comment #5

From: Cynthia Vanderhoof

Sent: Saturday, February 10, 2024 8:47 AM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Warehouse Planned for Behind Phillipsburg Mall

Council Members,

The Homeowners of the Parkside Neighborhood of Pohatcong DO NOT WANT ANOTHER WAREHOUSE IN OUR BACKYARD. This will spoil the peace and character of our Neighborhood. The noise at all hours from the trucks. The garbage. The unsightly building that will rise up literally behind our homes. We are already going to suffer from the Warehouse planned for the mall. Not to mention how all of this will effect the Pohatcong creek that flows behind the property.

Sincerely,

Cynthia Vanderhoof,
Concerned Parkside Resident
Sent from my iPad

Comment #6

From: Jason Menegus

Sent: Thursday, February 22, 2024 1:27 PM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] RE: Highlands Redevelopment Area Comments

To Highlands Council:

I am providing comments on the proposed redevelopment area in Pohatcong and Lopatcong Townships.

I am opposed to new warehouse construction in Warren County. The Phillipsburg Mall site would be better off being used for affordable housing and a mixed use site instead. Warehouses cause too much truck traffic. The proposed warehouse behind the mall site on farmland is too close to residential area and should not be considered redevelopment. How can farmland and forests that never had a building on them be redeveloped. The write up states that this parcel does not qualify for farmland preservation however throughout New Jersey. The two townships I believe signed this up for a conservation zone the whole property because they felt it couldn't be developed well. This was all zoned residential. Let the Highlands be open land not warehouses. We won't know the negative effects on surrounding land and roads until it's too late. The write says this farmland is isolated justifying why it should be rezone. If you continue having development you will get more isolation. The highlands is probably under the greatest development threats in the last 15 to 20 years. Please help stop the development and allow this to continue to be farmland

Jason Menegus

Belvidere NJ

Comment #7

From: Judy Liptak

Sent: Saturday, February 10, 2024 3:12 PM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Written Public Comments Highlands Redevelopment Area located in Lopatcong Township and Pohatcong Township (Warren County)

Dear Members of the Highlands Water Protection and Planning Council,

I am formally submitting my Written Public Comments for the Highlands Redevelopment Area located in Lopatcong Township and Pohatcong Township (Warren County). Please see the attached comments and photos for your review and as a record of my input to be considered on the matter.

If possible, can you reply to this email to acknowledge you were able to open and read written comments.

I appreciate your time in this very important matter.

Judy Liptak

February 6, 2024

To: Highlands Council

Subject: Public Statement for Highlands Redevelopment Area Designation - Phillipsburg Mall
Lopatcong and Pohatcong Townships Block 102, Lots 9 and 9.01 (Lopatcong) Block 1, Lots 1
and 1.01 (Pohatcong)

From: Judy Liptak Lopatcong, NJ

Imagine New Jersey, “The Garden State,” ten or twenty years from now? Visualize what that might look like. Is it still “The Garden State”? Has it lost its beauty and natural resources? Do you see heavy smog, asphalt parking lots, congested highways filled with tractor-trailer traffic, polluted waterways, and fields littered with warehouses? Now ask yourself, does the NJ Department of Environmental Protection and NJ Highlands Council have the tools to protect the Garden State from becoming heavily industrialized, densely populated, and polluted? It is your time to do what you have prepared your entire life to do: protect New Jersey and preserve the Garden State! Preserve the rural counties that maintain the vision of rolling hills, sprawling farmland, agriculture, and preserved lands filled with the bounty for which “The Garden State” was named. Stop the spread of heavy industry, industrial pollution, and widespread urbanization in the east from spreading west; do not allow Warren County to become the Linden of the West. **Due to the negative environmental impacts, loss of agricultural resources, and prolific over-development of warehouses in the area, I implore the Highlands council to protect the environment and the citizens of Pohatcong and Lopatcong**

by denying any request for the Highlands Redevelopment Area that would allow a warehouse or high industrial business to be built.

Negative Environmental Impacts:

To begin, the environmental impacts of building another warehouse in Southern Warren County are devastating, and unfortunately, we do not even know what the long-term effects of the cluster of warehouses will have on the environment. Approximately 14 mega warehouses are littering our landscape, with more in the pipeline; the environmental impacts are devastating. This enormous influx of warehouse development has resulted in negative environmental consequences for the area. Recent articles out of Pennsylvania have noted the sudden sprawl has gotten out of control, and there is little they can do to stop it. Some officials openly admit they did not do the due diligence needed to weigh out the long-term consequences of warehouse sprawl. Luckily for us, New Jersey's Highlands Council has the opportunity to think long-term and evaluate the consequences warehouse sprawl will have on our area.

The environmental consequences of building more warehouses in Southern Warren County are enormous and should not be ignored. The proposed warehouse development for the pristine farmland behind the old Phillipsburg Mall in Lopatcong and Pohatcong township will be built partly on approximately 69 acres of pristine farmland soil, which is considered Farmland of Statewide Importance, Prime Farmland that is Environmentally Constrained and surrounded by a tract that lies adjacent to Morris Canal historic sites, and also listed in the State Registers of Historic Places. The developer argues that the land has diminished value due to its isolation from other farmlands, so the developer believes paving over this land is a better solution- who is

buying this justification? I hope you are not! Please stop this development and protect this pristine land.

I have sat through many warehouse hearings and am left perplexed by the lack of in-depth environmental studies on the negative impacts of warehouse development in rural New Jersey. Rarely have there been air pollution studies. Warehouses increase tractor-trailer traffic, with trucks in and out 24/7, which increases air pollution, greenhouse gasses, and diesel truck emissions. The studies often lack data on the effects of increased light pollution on wildlife and the environment. There is rarely any mention of noise pollution brought on by the building's ventilation systems, operational noise, truck braking systems, and overcrowded roads. These impacts should not be dismissed or ignored. Unfortunately, these consequences often go unnoticed until it is too late.

The traffic study that was conducted for the Lopatcong and Pohatcong project was conducted by the developer's professionals who want to build the warehouse, and it appears to contain information designed to "hide" what is truly happening. The study in the proposal is from 2022, when the mall was not fully operational. The study references cars, not trucks, and there is a reference to another study by Atlantic Traffic & Design Engineering, LLC, but it does not give the date of that study. The traffic study also does not consider the pipeline of warehouses coming to the area on top of what we currently have. Additionally, the study does not discuss the current infrastructure, which is not designed to handle the amount of truck traffic we already have. We drive it daily and see firsthand what is happening; we don't need a traffic study. Every day, when I leave my house, I see truck infractions- for example, trucks parking on sides of roads and in empty lots, trucks driving through red lights, failure to read signs and driving where they are not permitted, blocking intersections, and making turns that are too wide,

causing cars to back down roads, and pulling out of driveways that do not have the proper turning radius for a safe exit or entrance onto a highway, to name just a few. (please see photos below)

The current proposal combines car traffic from popular fast-food restaurants and Kohl's retail store with trucks from two warehouses. The intersection at Route 22 and 519 was not designed for heavy truck traffic. These trucks will be moving 24/7 without any consideration to neighboring residential areas. In addition to the truck and infrastructure issues, our local, county, and state political system has failed us. For example, we have local politicians, county politicians, and state senators meeting with NJDOT to look to give grants to build access roads for trucks instead of looking for ways to stop the sprawl, protect our natural resources, and fix the current infrastructure. They are asking for money for a proverbial "band-aid" that will not address the real problem. To ask for money while simultaneously continuing to allow the building of more warehouses is questionable. We also have some politicians who work with these same developers and the lawyers representing the developers building the warehouses. How can we compete with this system when we are the underdogs trying to save precious land?

The study states State Route 78 is 1.1 miles from the proposed warehouse, but what it doesn't mention is that first, the trucks from this proposed warehouse must exit down an access road that is directly next to a quiet neighborhood with only an old, overgrown treeline (wide open in winter) as a buffer; how is that fair to the citizens that live there. Then, the trucks exit within a stone's throw of two neighboring houses. (remember this is 24/7 truck traffic) The exit lane that merges onto Route 22 with car traffic is a short distance (a little bigger than a truck's length) to the first traffic light and intersection at 519. This area backs up quickly. Trucks from 519 (Strykers Road Distribution Center), soon-to-be trucks from Howard Street in Phillipsburg,

and trucks from the Bridge Warehouse Complex on Route 22 converge here. Also, within that 1.1 miles, three traffic lights are only a short distance apart, and trucks from all of the above are traveling that same route toward Route 78 in addition to trucks from PA and normal car traffic. Sadly, once the trucks make it through the first two lights after the proposed development, they come up to the light at Route 22 and 222, which adds another slew of trucks from the Alpha warehouse complex (two more in the planning stages there), trucks exiting from 78, and a truck stop. If this does not give you a vision of truck congestion and bottlenecks- the 22/222 traffic light will have another popular fast food restaurant and the Target Shopping Center entering and exiting at the same light. Between the Lowes traffic light and 22/222 light are Walmart Super Center, Wawa, and a Dunkin Donuts, with trucks pulling in and out on Route 22 and mingling with cars. The entrance to Dunkin Donuts does not have the proper turning radius, so trucks often take up one or two lanes to enter and exit.

On top of that, trucks park on the side of the highway to avoid having to enter the parking lots for Wawa, White Castle, and Dunkin Donuts; this causes grave safety concerns. My hope is you now have a true picture of what that mere 1.1-mile trek to Route 78 looks like and how misleading, to say the least, the traffic study and other reports are. I drive that same route frequently and often sit side by side with a line of five trucks all waiting to get through the same light, which cannot even come close to happening - legally. I can not imagine what more warehouses and trucks will do to this area; it is both scary and sad to think about.

Recently, the state of New Jersey created guidelines for municipalities to use to help control warehouse sprawl; unfortunately, these are just that, guidelines, and in this situation, our local leaders are not interested in stopping the sprawl and protecting our valuable resources, so it is up to us to help them understand.

The guidelines reference approximately six different types of warehouses developed in New Jersey, each with a particular business model and estimated truck traffic numbers or “trips” in and out of the area. For a proper traffic study, knowing the type of warehouse a piece of land is zoned for is important. The absence of this information would leave a large margin of error in any traffic study. Approving warehouse development without knowing the type of warehouse or the company occupying it is careless. It leads to misinformation in traffic studies, resulting in dire consequences for the community. The current warehouse proposal and its traffic study lack a tenant or designation for warehouse type. A fulfillment center will have fewer daily truck trips generated in and out of the facility in comparison to a distribution center that would have significantly more trips. We must not forget that these “trips” are 24/7, not just during business hours; this significantly impacts the neighboring homes and other environmental factors.

Loss of Agricultural Resources

The loss of natural resources within the Highlands Agricultural Area due to the heavy industrial development cannot be the goal of the Highlands Council. Highlands Council should be the beacon of preservation, not industrial development. It is stunning to think Warren County is within the NJ Highlands boundary, which currently houses 14 mega warehouses within a small slice of Southern Warren County. Our precious drinking water is the most important natural resource we have, and protecting that resource should be our top priority. Preserving open space, not paving over it by allowing more warehouse development, should not be permitted on pristine farmland near Lopatcong Creek. As our population grows, we must be conscientious about protecting our valuable resources. It is unfathomable that a warehouse is even being considered on this precious land. More than half of Warren County falls under the Highlands Boundary, which helps to provide nearly 70% of New Jersey’s drinking water. The region has significant

value to our state, and we should ensure the protection of the natural resources it provides. To allow another warehouse to be built on farmland is unimaginable; no matter how you spin it and fit it within guidelines, it is wrong and should not move forward.

Some concerning notes from the Draft Highlands Staff Recommendations Report need to be emphasized, the first being the Waste and Waste Water Service Section. The report states, *“Water and wastewater infrastructure is available **via extension** through the former mall site or adjoining developed properties to serve the proposed warehouse project. The **RMP does not support extension of water/sewer service in the Conservation Zone** or any of the environmentally constrained sub-zones (rear properties). The service extension would **only be permissible** for the proposed warehouse **with the approval of the Highlands Redevelopment Area**. (this is where there should be a **full stop** by the Highlands Council) **As the rear properties are not within the sewer service area, the respective municipal wastewater management plans will need to be amended if this application is approved.**”* There should be no amendments or approvals for any extension, sharing sewer capacity from the old mall property, or allowances of any sort that would support the reallocation of sewer capacity. I understand that Phillipsburg does not allow sewer sharing; therefore, no exceptions should be made for the proposed warehouse property on the pristine farmland in Pohatcong and Lopatcong.

Another area of concern in The Highlands report is that *“The overriding resource of concern is the **loss of agricultural resources and Important Farmland Soils**, which cover 86% of the tract. The rear, currently undeveloped lots, are currently in agricultural use. They are located in the Highlands’ Agricultural Priority Preservation category and are **designated as an Agricultural Resource Area**.”* If I am not mistaken, the solution to the loss of this precious resource is to limit development elsewhere in the Agricultural Resource Area and provide local

use of the removed topsoil within the region, not restrict the building of another warehouse. To repeat, this is a designated Agricultural Resource Area- why would any steward of the environment even consider building a warehouse there?

Additionally, the report states, “*Designation of the proposed Highlands Redevelopment Area provides for beneficial use of the site. By reusing and redeveloping previously disturbed areas, economic investment and community development within the framework of **smart growth** is assured...*” I respectfully disagree with the statement regarding smart growth. According to the Oxford Dictionary, smart growth is *planned economic and community development that attempts to curb urban sprawl and worsening environmental conditions*. Building another warehouse in an area with 14 mega warehouses and on pristine farmland is not an example of smart growth.

Prolific Over-Development of Warehouses in the Area

It is unimaginable that there are 14 Mega warehouses clustered in a small slice of Southern Warren County, New Jersey, with more to come! Our government is failing us. The environmental impacts of this type of development cannot be disputed, yet the warehouses keep coming. No resident should have a warehouse or warehouses built in their backyard. That is exactly what will happen to the residents near the potential building site in the well-established neighborhood of Pohatcong. Warehouse placement should be strategically planned and placed directly near rail lines, ports, and interstate highway arteries where trucks do not pass through local or county roads, or near quiet neighborhoods in residential areas. Any warehouse built outside the logistics highway structure or on pristine farmland is just bad planning. We cannot overlook the obvious. No resident should be concerned with having a warehouse suddenly

erected in their backyard and endure 24/7 truck traffic, increased air pollution, industrial sounds, and light pollution. No warehouse, for any reason, should be built on the farmland in Pohatcong and Lopatcong.

Developers are looking in all the wrong places because appropriate sites are scarce and expensive; they are looking for cheap land, not looking to do what's right for the environment or its citizens. Greed prevails in this scenario, so why are we allowing it? Developers are driven by the almighty dollar and in the best interest of their pockets, not the environment, state, towns, or citizens. Developers produce data that hired professionals write in their studies to support warehouse development. Lawyers and developers with deep pockets outplay local leaders.

Additionally, local leaders in smaller communities struggle to grasp the real consequences of the proliferation of warehouses and the negative impacts they bring. They are short-sighted in seeing the real picture; instead, they see only the picture painted by the developers that sell a promised windfall of taxes and jobs while ignoring the cost of the negative consequences warehouses bring. Nobody is doing long-term cost-benefit analysis to weigh project revenues against the increase in municipal service costs and impacts. Towns are not looking into the promised tax windfall and job creation to see if they outweigh the additional costs in providing increased municipal services, infrastructure changes, public safety concerns, decrease in public health, loss of real estate value, increased crime rates, diminished community character, and the quality of life.

While state legislation is lacking and home rule prevails, how or who can protect the voiceless? Who protects the environment and its precious resources? The overdevelopment of warehouses is a runaway train careening toward impact; our state has lost control, and dire consequences are ahead. Unfortunately, our local leaders are not willing to recognize the

consequences. In that case, we need the Highlands Council to step in and use every tool in its arsenal to fight and stop this proliferation of warehouse development- even if it is one at a time.

As our population grows, paving over farmland we desperately need does not make sense. Instead, build stronger programs to protect them while making the process for farmers to preserve their land easier and financially appealing. Paving over pristine land is not the answer. This is rural Warren County in the Garden State, and sadly, that title is quickly fading away. We need farms and farmers to grow crops, not pave over them. Why do we have proposed legislation that would ban foreign ownership of agricultural land when all we do with that land is pave over it? Instead, we should have legislation that protects and preserves that land for future farming generations. Please stop the destruction of pristine farmland and protect the environment and the citizens of Pohatcong and Lopatcong by denying any request for the Highlands Redevelopment Area that would allow a warehouse or high industrial business to be built there.

Trucks Blocking Intersection at 519/22

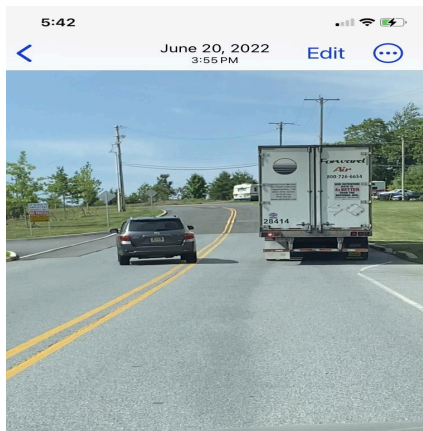




Trucks On Residential Roads



Truck Road Violations





Accidents





Litter and garbage where trucks park in empty lots throughout town.



Pee Bottle thrown from truck





*** All pictures are all taken within the town limits of Lopatcong, Route 22, and 519.**

Comment #8

From: jean public

Sent: Monday, January 22, 2024 10:51 AM

To: Highlands [HIGHLANDS] <highlands@highlands.nj.gov>

Subject: [EXTERNAL] Re: Public Comment Sought: Redevelopment Area

[opposed](#)

Comment 9: Highlands Council

Public statement for the Phillipsburg Mall Highlands Redevelopment Area

Lopatcong and Pohatcong Townships

John Kecherson



Introduction

I have lived in Lopatcong for 15 years. While progress cannot be stopped, there are many reasons to oppose yet another warehouse in our once semi-rural area, which I will outline in the next several pages. As I drive past what remains of the farmland on State Road 57, I pass a billboard showing a picture of the forest with the words "Love It or Lose It". I do love what's left of our once beautiful community, but am afraid we are losing it to greedy developers that seem intent on paving over the entire area for warehouses.

Proliferation of warehouses in southern Warren County

Between just the four towns of Phillipsburg, Lopatcong, Pohatcong and Alpha, there are 14 mega-warehouses built or planned in a tiny geographic area. There are also plans for an additional warehouse on Stryker's Rd. in Lopatcong, in litigation, for a total of 15 mega-warehouses totaling nearly 9 million square feet. This recent explosion of warehousing is not smart growth by any definition and will have cumulative severe detrimental impacts on the community as they continue to be built.

This area cannot sustain the truck traffic from the warehouses already built, yet the townships of Lopatcong/Pohatcong are asking the Highlands Council to approve another warehouse that will be built on farmland that is considered to be Farmland of Statewide Importance, Prime Farmland, Greenway/Open Space, Environmentally Constrained, and abuts a quiet residential neighborhood. The draft for public comment report states the Highlands Council considers the loss of farmland and important farmland soil resources as a cumulative and growing problem in the region, yet recommends approving the development of this land into another warehouse with only minor conditions.

There is no logical reason why this farmland, abutted by a residential neighborhood and is home to the Lopatcong Creek should be developed into a warehouse. Another warehouse will add to light pollution, diesel emissions, noise pollution, water pollution and horrendous traffic. The negative impact of the current 7 area warehouses has already had a dramatic impact on the area, and the cumulative effect of 15 mega-warehouses has not yet been realized.

Traffic

In the draft for public comment document, the Highlands Council addresses the traffic study completed as part of the Lopatcong redevelopment plan document. The traffic study makes the misleading claim that the full buildout of both warehouses (on the Phillipsburg Mall property and the prime farmland behind it) will generate significantly less trips for some time periods and a similar number of trips for other time periods considered. This study is purposefully misleading in that it considers current conditions to be a fully functioning mall, when in reality current conditions are a defunct mall (with less square footage than listed by the study) and prime farmland. The actual data used for and provided with the study paints a very different story. Compared to actual current conditions, the data indicates trips per hour will increase significantly for all time periods studied. The data shows traffic will increase by nearly 500 trips per hour for both AM and PM peak hours and 200 trips per hour for Saturday peak hours. Since the study is provided by the developer, who doesn't yet have a tenant for the warehouses, this is a "best case" scenario and in reality may be significantly worse.

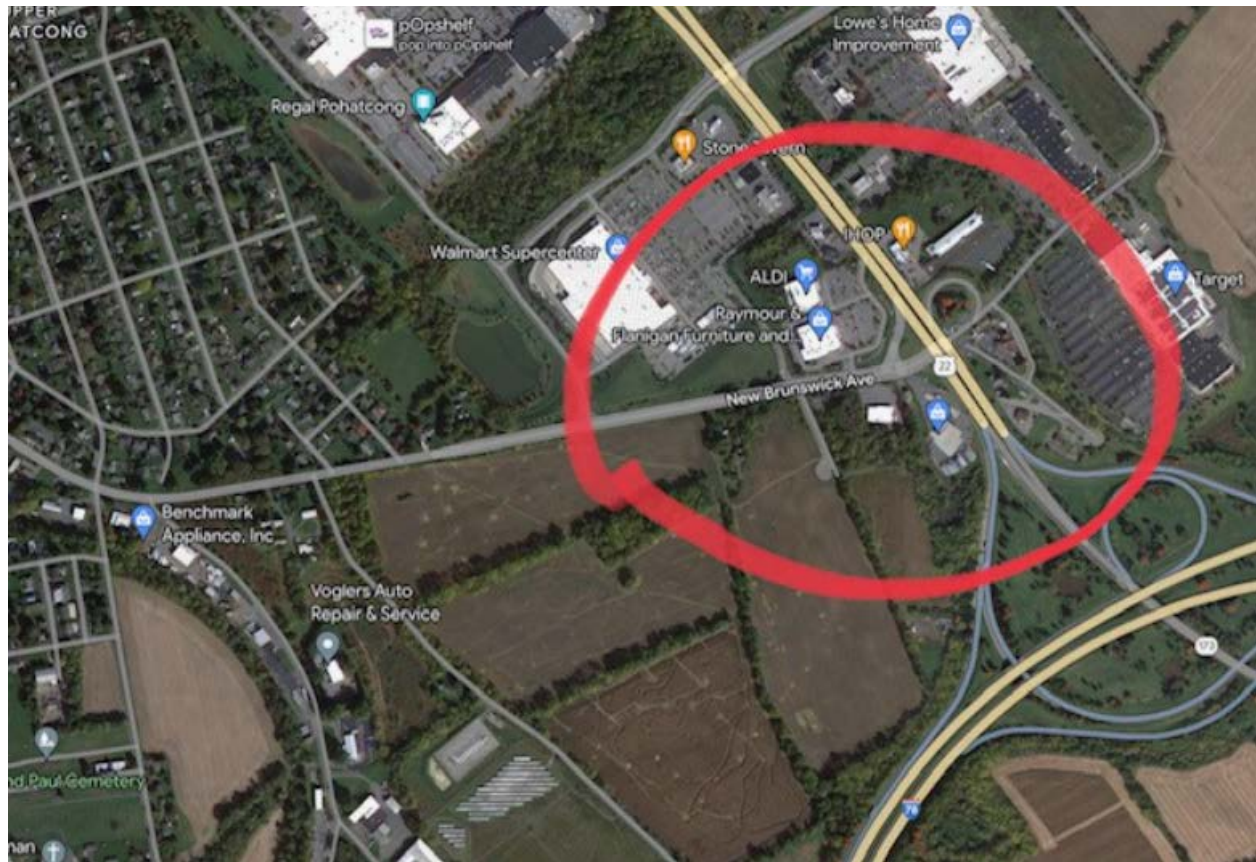
The Highlands Council recognizes the study is myopic and does not include the cumulative impact of the other warehouses (15 total!) that are in the pipeline for the area, and states a much more comprehensive regional study is needed to understand the cumulative impact of

all these mega-warehouses. I would submit that the time to conduct such a study is before the warehouses are approved, not after.

The Highlands Council states that the direct access to a highway (US 22) and proximity to an interstate (I-78) should ensure that heavy truck traffic needn't use local roads and byways to get to or from the facility. This makes sense in theory, but in reality, proximity to an interstate will not keep heavy truck traffic off of local roads, as is already happening, and additional information is provided about this under "Impact on the Surrounding Community".

Multiple Pohatcong council minutes show council members are already concerned about the negative impact truck traffic from warehouses are having on their citizens, and during a council meeting Mayor Slack of Pohatcong stated that at one point US-22 will need to be widened in order to accommodate traffic from all of the warehouses being built. This does not align with the disingenuous claim that the addition of >1.4 million SF of warehousing will generate significantly less trips than a defunct mall and prime farmland.

The Highlands Council report notes proximity of the proposed warehouse to US-22 and I-78 as being beneficial. What isn't noted is the intersection of New Brunswick Ave and 22, located just west of the I-78 interchange, is already nearly impossible to get through with truck traffic from already-built warehouses. New warehouses (besides those that are being considered here) are planned in Pohatcong and Alpha on land just south of New Brunswick Ave. A warehouse on Howard Street in Phillipsburg was just approved and will use New Brunswick Ave as their designated truck route. This already difficult intersection will be an impossible intersection with most of the trucks from the 15 mega-warehouses in the area going through it heading to I-78.



Impact on the Surrounding Community

Some time ago, I wrote the mayors of Lopatcong, Phillipsburg, Pohatcong, Alpha and Greenwich asking if they've considered working together to address the overall impact of 15 mega-warehouses will have on the general area. Only one mayor answered my inquiry, the mayor of Greenwich. It should be noted that Greenwich is the only town in the immediate area that has no warehouses, none planned, and excludes warehouses in their master plan.

I've been attending Lopatcong council meetings for more than three years, have attended multiple Pohatcong council meetings, as well as Greenwich council meetings. The Lopatcong council has repeatedly denied seeing any issues with trucks from the warehouses, even when presented with specific examples and pictures. The Pohatcong council has expressed concerns about truck traffic from warehouses in surrounding towns, which makes one wonder why they've proposed the two warehouses on the mall property and prime farmland behind it. At the Greenwich council meetings I've attended, the Greenwich mayor started by stating the biggest quality of life issue his community faces is from trucks, then asked his police chief for statistics related to tickets issued to truckers.

The Highlands Council's recommendation report notes the proximity of the proposed warehouses to a highway and interstate should ensure heavy truck traffic needn't use local roads. In reality, trucks from existing warehouses in the area, located next to US-22 with easy

access to I-78, are already using local weight restricted roads, turning around on private property, and illegally using private property as parking and staging areas. Some unscrupulous property owners are allowing trucks to stage on their properties, in some cases causing truckers to drive through residential neighborhoods on weight restricted roads.

There is no reason for a truck to be on a local road in Greenwich, for example, as the existing warehouses are located in very close proximity to US-22 and are approximately the same distance from I-78 as the warehouse proposed for this report. Yet according to the Greenwich Mayor, the biggest quality of life issue his residents face is from trucks on local roads. A Greenwich council member stated that Greenwich is considering making the section of Stryker's Road in Greenwich one-way in an effort to battle this quality-of-life issue they face, brought about by warehouses in surrounding towns.

While noise pollution, diesel emissions, traffic, and truck crashes are a huge concern for citizens, garbage from truckers is another concern. A few months ago, I walked a ½ mile of Stryker's Road from state highway 57 to the Greenwich border. The garbage on the side of the roadway is disgusting, the number of little liquor bottles horrifying. While one can argue that it's hard to attribute garbage specifically to truckers, one form of garbage is fairly unique to truckers...trucker bombs. Trucker bombs are water bottles that trucker's use to urinate in and toss out the window. In the ½ mile of Stryker's Rd. that I walked, I counted 14 of these biohazards lying on the side of the road. This is hardly what one thinks of when they consider a town located in the Highlands, and one would hope the Highlands Council would consider this impact to the area as well.

The following is a very small sample of pictures showing the impact warehouses and trucks are already having on the surrounding community, including many of trucks on local roads where, in theory, they should not need to be due to easy access to US-22 and I-78. It should be noted that prior to warehouses opening in the area, none of these issues existed, with the exception of an occasional truck needing to be turned around at the train tracks on County Road 519. It should also be noted that to date only 7 of the 15 warehouses planned are built, and the negative impact is already nearly intolerable. The potential impact of more than doubling the number of warehouses in the area unfathomable:



Trucker bomb – one of 14 found in a ½ mile section of Stryker's Rd where there is only one warehouse. At least one more warehouse is approved to be constructed on Stryker's Rd. with another in litigation. Prior to the opening of the current warehouse on Stryker's, no trucker bombs would be seen.



One of the hundreds of mini-liquor bottles found on the side of Stryker's Rd. in Lopatcong. While it is difficult to say these are specifically from truckers, these had not been so prevalent prior to the warehouses opening in the area. It is scary thinking someone hauling 80,000# might be drinking.



Other trash unique to trucks is Diesel Exhaust Fluid (DEF), used only with diesel engines. This trash was left alongside Stryker's Road by a trucker.

The pedestrian crossing switch located at the intersection of Stryker's Rd. and 57. This is a difficult turn for a truck to make, and the dual wheel tire tracks indicate a truck knocked this down.



Trucker's illegally staging on private property along US-22 in Lopatcong. After more than a year of issuing tickets to the property owner, they were fined \$250 and this illegal activity continues. Multiple properties in Lopatcong are being used for illegal truck staging and parking.



Trucks illegally staged in a closed business in Greenwich. These trucks are associated with the mail sorting warehouse on Stryker's Rd. in Lopatcong. Greenwich has taken steps to ensure this property no longer gets used for a staging area, but they are finding other businesses that are illegally allowing them to stage on their properties.



Truck illegally staged at Rath's Deli (after hours) in Greenwich. Greenwich PD is very responsive to calls from concerned citizens, but responding to illegally parked trucks is potentially taking away from more important calls.



Trucker turning around on private property on County Road 519 because they ignored the multiple low clearance signs.



Trucker causing traffic backup on County Road 519 (blue truck on the far side of the underpass) because they ignored no less than 5 low clearance signs and had to be turned around.



Trucker turning around on County Road 519 because they ignored the low clearance signs. Note the school bus coming around the blind curve.



This trucker ignored no less than 5 low clearance signs on County Road 519 and thought his 13'6" tall truck could fit through the 10'0" clearance. The result of this crash closed 519 for hours, causing much frustration for local residents. When brought to the attention of the Lopatcong council, the response was a shrug and they said it happens all the time.



Trucker driving through a residential neighborhood in the close by Hillcrest section of Phillipsburg.



Trucker lost on extremely narrow streets in Phillipsburg. Note the truck is on the pedestrian sidewalk.



Trucker illegally parked on private property at the corner of County Road 519 and State Road 57 in Lopatcong.



Trucker using a farmer's field on Stryker's Rd. in Greenwich to turn around and became stuck.



Trucker parked in the Morris Canal parking lot despite the presence of “No Truck Parking” signs. This impacts folks who want to park in the lot to hike the trail created as an Eagle Scout project.

Truck on the left is double parked on Stryker’s Rd. and another is parked in the Morris Canal parking lot. Truckers often illegally park on Stryker’s Rd. in order to go to Rath’s Deli.



More trucks (from the mail sorting warehouse on Stryker’s Rd. in Lopatcong) illegally parked on Stryker’s Rd. in order to go to Rath’s Deli. It should be noted that these illegally parked trucks often cause vehicles to cross the double yellow line in order to get around them, as well as creating dangerous blind spots for people pulling out of Rath’s parking lot.



This trucker drove north onto a weight restricted section of Stryker's Rd. (north of State Rd. 57), tried to turn around in the Saint Lukes Plaza and had to be guided out by two Lopatcong policemen. This is dangerous, inconveniencing, and potentially takes police away from more urgent calls.



Trucker using local weight restricted (4-tons) road Belvidere Rd. in Lopatcong.



Trucker turning onto Baltimore St. in Lopatcong, a 25 MPH weight restricted (4-tons) residential road.



Trucker creating a hazard by parking in the travel lane on the wrong side of the road with no lights on within the Walmart shopping plaza in Pohatcong to get food.

[Lopatcong's Amendment to the Highland Center Boundaries Process](#)

Lopatcong's Petition for Plan Conformance states that the center planning process "will be transparent with public meetings to discuss the implement of the petition" and further states "The amendment to the Highlands Center Designation will be discussed at a public information session to be held jointly the week of December 12th".

Nothing could be further from the truth, the Lopatcong council has been everything but transparent. It should be noted that the Lopatcong council voted "yes" on ordinance 2022-08

to adopt the redevelopment plan and request designation from the Highlands in October of 2022, two months prior to any public information meetings.

I've been attending Lopatcong council meetings for more than three years, and asking about warehouse plans for the mall property and prime farmland behind it the entire time. Each time the public broached the subject of warehouses on these properties, the council, specifically Mayor Mengucci and Council President Bill Wright, denied all knowledge of warehouses being built there. All other council members sat in silence as the Mayor and Council President made these denials and deceived the public. These denials and deception despite the council passing a resolution in December of 2020 stating the Phillipsburg mall would be developed into a warehouse.

After passing this resolution in December 2020 (both Mayor Mengucci and Council President Bill Wright voted yes on this), they told the public on multiple occasions a warehouse wouldn't be built there, and couldn't be built there, including these few of many examples:

In April 2022, Bill Wright stated that Pohatcong was going to build a warehouse there, and "we (Lopatcong) might get a parking lot but right next to a warehouse. Or a piece of grass".

In July 2022, when it was brought to the council's attention that the Pohatcong council stated the Phillipsburg Mall and farmland behind it would be developed into warehouses, residing mostly in Lopatcong, Mayor Mengucci stated "Where they're coming up with that, I don't know. I know they have something proposed over there". Council President Bill Wright stated "I've made the statement a couple of times, we get a parking lot., It's (the warehouse) is going to come right up to our property line, where they can do it, it's going to be a building of theirs". They went on to accuse the public of getting their information from social media.

In October 2022, Bill Wright angrily approached members of the public in the parking lot after a meeting and, after a curse laced tirade, stated he hopes the townships propose warehouses on these properties so the Highlands Council could deny them.

In November 2022, a gentleman asked the council how many more warehouses were planned for Lopatcong. Mayor Mengucci answered "one that I know of, the one on the solar field on Stryker's". This deception despite the mayor having just approved, as planning board member, the redevelopment plans for the mall property and farm field and knowing full well two warehouses are proposed there.

Denials, lies and secrecy. It is impossible for the public to be informed and make their concerns known when their town council purposefully hides their true intent.

During one of the public information meetings for the Redevelopment Plans for these properties, Pohatcong Planner James Kyle stated they had worked with subcommittees of the Lopatcong and Pohatcong councils to develop the warehouse plans. When asked who from the Lopatcong council was on the subcommittee, Lopatcong Planner George Ritter reluctantly stated Bill Wright and another council member, who he refused to name, were on the

subcommittee planning warehouses. Bill Wright, the Council President who repeatedly denied knowledge of what was proposed for the mall property and farmland behind it, who denied warehouses could be built there, was on a subcommittee planning them.

During the two meetings where the council considered then voted to send their request for center designation to the Highlands Council, the meeting room was packed with out-of-town union workers (Bloomfield NJ, Columbia NJ, etc.) some making pro-warehouse statements. Also present was State Senator Douglas Steinhardt. Lopatcong council meetings are typically sparsely attended, and in the three years I've been attending, I've never seen these out-of-town union workers, nor have I seen Doug Steinhardt. State Senator Steinhardt remained silent throughout the meeting, but as the out-of-town union workers made their pro-warehouse statements, some folks who were with Doug clapped and cheered.

What is the connection between State Senator Douglas Steinhardt and this warehouse project? According to Pohatcong council minutes, Doug Steinhardt submitted the plans for the warehouse behind the mall. According to an escrow document obtained via an OPRA request, Doug's law firm partner Michael Perrucci is the developer of the warehouse and Seth Tipton, of the same law firm, is representing the developer.

Lopatcong council meeting agendas are usually posted at the very last minute, and can typically change throughout the day of the meeting. One has to wonder why these out-of-town union workers from as far as sixty miles away attended a Lopatcong council meeting to make pro-warehouse statements, as well as how they knew the warehouses were going to be discussed.

During the April 2023 meeting when the Lopatcong council passed the final resolution to send the Center Designation request to the Highlands Council, again packed with union workers making more pro-warehouse statements, I asked if it was considered the public hearing referenced during the public information meetings. Lavery, the Lopatcong Attorney, responded it was not, and that neither the public information meetings nor a public hearing was required.

Deception, denials, outright lies, packing a meeting with out-of-town union workers, and a State Senator who mysteriously attends a meeting where his law firm partner's project is being voted on. All this illustrates public exclusion as opposed to the public inclusion the Highlands Council states they expect for a center designation request.

Multiple Pohatcong council minutes indicate Mayor Slack and other council members were concerned about the number of calls and e-mails from angry residents voicing their opposition to the warehouse on the farmland, and since the warehouse is only 20% in Pohatcong, they were considering removing the property from the center designation request. Each time this was mentioned, they were convinced by Lopatcong to not remove the property from center designation request. It is most likely why the Highlands Council report

states Pohatcong provided a letter indicating they do not object to Lopatcong taking the lead role in the application.

But it doesn't matter, does it? According to Pohatcong Council minutes, Pohatcong Attorney Benbrook had spoken with Lopatcong Attorney Lavery who said he made it clear to the Highlands Council that Lopatcong was not willing to go through a protracted process and would simply pull out of the highlands if given too hard a time for approval.

[Request for Denial](#)

With the above-mentioned reasons in mind – traffic, pollution, loss of yet another parcel of prime farmland, concerns of the overall cumulative effect of 15 mega-warehouses, severe impact on the surrounding communities and the denials, deception, and lies from the Lopatcong council throughout the entire process, the Highlands Council should do what is right for the citizens of Lopatcong/Pohatcong, as well as the surrounding communities. The Highlands Council may not be able to weigh in on properties already in the Highlands Center, but the Council certainly doesn't have to knowingly contribute to the destruction of the area, an area they are supposed to help protect. I urge you resist bowing to Lopatcong's threats to pull out of the Highlands and to deny the request for the Highlands Redevelopment Area that will bring further destruction to our area.

Comment 10:

From: Craig and Angela Merrick

[REDACTED]

RE: Public Comments for Application of Highlands Redevelopment Area
Designation-

Phillipsburg Mall Highlands Redevelopment Area

Dear Highlands Council Members,

Our names are Craig and Angela Merrick. We own and live at [REDACTED] in Pohatcong Township which is well within 200 feet of both the “Phillipsburg Mall Property” and the actual subject of this application, Block 1 Lot 1 (farmland behind the mall). We have resided here for the past 20 years.

We’ve attended numerous public meetings, council meetings, and spent hours, days even, reading and re-reading the application and the proposed Highlands Council Warehouse Guidelines trying to come up with valid arguments against this application. And we’ve decided none of it matters. We’ve wasted days of our lives and lost nights of sleep we will never get back. It does not matter because we are realistic people who know the “little guys” never win and as long as big money under the guise of “economic growth” is involved, we don’t stand a chance. However, we fought this every step of the way (after we found out about it anyway) and we’re determined to show our children that you don’t give up the fight and see it through to the end.

We want to make it abundantly clear, we are not opposing the redevelopment of the former Phillipsburg Mall. We’ve lived here for 20 years and watching the mall close and be inhabited by homeless people saddened us. We have never been under the delusion it would remain barren. It is our understanding this project is already going through the proper approval channels within Lopatcong and Pohatcong Townships. What we *are opposed to* is attaching the “redevelopment” tag to a piece of prime farmland that directly drains to a Category One Waterway (Lopatcong Creek), slapping a warehouse the size of the former mall on it for the sake of gaining a “rateable”, and allowing things like preserving farmland and rich soil resources somewhere else in the Township.

One last thing before commenting on specific points in the actual application review. When Pohatcong Township Council voted to send this application to you, it was noted several council members, both in public and private, expressed agreement with residents that they also did not want a warehouse on Block 1, Lot 1. Because they were trying to bundle an application for another piece of land (Block 38, Lot 1) somewhere else in Pohatcong Township that would help meet the Township's Affordable Housing requirements, they "reluctantly" put a yes vote on this proposal. We find it completely ludicrous now, as we read the review of this project, it's JUST for Block 1, Lot 1. Where has all the information about Block 38, Lot 1 gone? Many residents were under the assumption this had to be done all together and that the Highlands Council "would be the governing body that could stop this warehouse project". The application/proposal STILL on [Pohatcong Township's website](#) shows this other lot! The plans and photos in the appendices shown in your application review were something never presented to Pohatcong Township residents. Other documents were shown, but not those. It's interesting how more and more has been done since the public meetings and votes to send this your way, and yet the residents are still in the dark.

We'd like to point out a few notes in the review of this application:

Loss of Farmland Resource

"The overriding resource of concern is the loss of agricultural resources and Important Farmland Soils, which cover 86% of the tract. The rear, currently undeveloped lots, are currently in agricultural use. They are located in the Highlands' Agricultural Priority Preservation category and are designated as an Agricultural Resource Area.

The development project would occupy roughly 36 acres of the 69-acre Important Farmland Soils area. The remaining 33 acres would lie partially within the proposed HERZ area, with the rest proposed for grasslands and reforestation."

We noticed this is one place where they didn't use percentages and just used the numbers to support the argument. We guess most people won't immediately look at that and realize 36 out of 69 acres is 52.2% of the farmland. Losing over half of the farmland should be *"an overriding resource of concern"*.

“The application indicates that the parcel does not qualify for farmland preservation funding and argues that its value as farmland is diminished by its isolation from other farmlands. The Highlands Council considers the loss of farmland and important farmland soil resources as a cumulative and growing problem in the Region, regardless of the location. The Highlands Council requires mitigation offsets for development projects that impact important farmland soils located within a Highlands Redevelopment Area. This would require the mitigation of any proposed development in this area and the disturbance of prime farmland soils by limiting development elsewhere in the Agricultural Resource Area, preferably within the same subwatershed.”

First of all, mitigation or saving/preserving farmland and/or farm rich soil somewhere else is like taking merchandise from Walmart and paying Target for it. It doesn't make any sense.

If “Highlands Council staff conducted site visits on September 21, 2023 and December 15, 2023 to document current conditions and examine the area proposed for redevelopment”, then they surely noticed this is THE ONLY piece of farmland left within the same watershed (sub-watershed, “Lopatcong Creek (below Rt 57) incl UDRV). This. Is. It. If you, as a council, “consider the loss of farmland and important farmland soil resources as a cumulative and growing problem in the Region”, then why are you allowing this application to contribute to it?

Traffic

“In support of the warehouse proposal, the petition includes a vehicle access analysis prepared by John R. Wichner, P.E., of McMahon Associates dated June 15, 2022, referred to as “Phillipsburg Mall – Access Analysis, CRG Mixed-Use Development and J.G. Petrucci Warehouse Development.” The study relies upon a prior study completed by Atlantic Traffic & Design Engineering, LLC, to compare traffic theoretically generated under ‘existing’ conditions (e.g., assuming full operation of Phillipsburg Mall and adjacent uses) vs. that anticipated under the proposed build-out, including both warehouses and adjacent uses to remain. The results suggest that under January 22, 2024 Page 7 the proposed build-out, trip generation would be similar to existing conditions for the weekday morning peak hour, but significantly reduced from existing conditions for weekday afternoon and Saturday midday peak hours.”

We understand comparing current/existing traffic conditions to the proposed numbers is standard practice; however, “theoretical” existing conditions of a fully functioning mall—that hasn’t happened for ten (10) years! In the very least, the mall, in any capacity, has not been functioning since covid lockdowns which is now four (4) years ago (we live right behind it—we know) and since then there have been plenty of other warehouses opening in this area. Which begs the question: what are the current traffic conditions on the Route 22 corridor and how will these additional warehouses affect local traffic? Existing conditions mean existing as of now. Not “theoretical existing conditions”. This isn’t make believe. This is real life. Right now there isn’t much traffic generated from a run down building.

Also, we know you'll say this is an enforcement issue (and it most definitely is), but the number of trucks traveling in and around the surrounding neighborhoods has increased as the number of warehouses in the area have increased. There’s 1,044-1458 potential “trips” during peak hours, a large percentage most likely being trucks. There’s a big difference between truck traffic and regular passenger vehicles. How many more trucks do we have to contend with—when is enough ENOUGH?

Water and Wastewater Infrastructure

“Water and wastewater infrastructure is available via extension through the former mall site or adjoining developed properties to serve the proposed warehouse project. The RMP does not support extension of water/sewer service in the Conservation Zone or any of the environmentally constrained sub-zones (rear properties). The service extension would only be permissible for the proposed warehouse with the approval of the Highlands Redevelopment Area. As the rear properties are not within the sewer service area, the respective municipal wastewater management plans will need to be amended if this application is approved.”

There is NOT sufficient water and wastewater infrastructure, nor is any extension allowed UNLESS you approve the redesignation. This site is solely dependent on the “mall property” for this infrastructure because, you know, it’s farmland now.

If you’ve indulged us this far, we’d like to make one last comment:

If you, as the Highlands Council, have spent so much time the past few years working on these new warehouse guidelines and policies, then why approve this redevelopment of farmland? Warehouses are completely prohibited in Existing Community Zone, Conservation Zone and Conservation Environmentally Constrained

Subzone which this property is designated as right now. If you approve this change in designation, then it is abundantly clear to us, you are nothing more than the local politicians who say one thing and do the opposite.

Thank you for your time,

Craig and Angela Merrick

Comment 11:

January 22, 2024

Benjamin, L. Spinelli Executive
Director
New Jersey Highlands Council 100
North Road
Chester, NJ 07930

RE: Lopatcong and Pohatcong Highlands
Redevelopment Area Designation

Dear Director Spinelli,

Please allow this letter to accompany the Petition submitted to NJ Highlands Council for the Highlands Redevelopment Area Designation for Lopatcong Block 102, Lots 9 & 9.01 and Pohatcong Block 1, Lots 1 & 1.01.

As has been well documented, Lopatcong and Pohatcong in the spirit of mutual municipal cooperation, have undertaken a joint redevelopment effort, to assist in the redevelopment of the former Phillipsburg Mall property located along Route 22 and in both Townships. The collective redevelopment effort included the landlocked properties behind the mall, which are the subject of this Petition to designate as a Highlands Redevelopment Area.

The Townships of Lopatcong and Pohatcong have undertaken various procedural steps, some at the request of the Highlands, to allow for this petition to be approved. Over several months, the Townships held joint informational meetings, publicly advertised, and encouraged public comment. Additionally, each Township prepared planning and redevelopment reports that were presented to our governing bodies, discussed and voted on at public meetings and

ultimately, passed resolutions creating the municipal Redevelopment Area and to permit this petition to be submitted to Highlands.

Through many months of planning, our Township staffs have engaged with the developer of these properties to prepare conceptual plans that meet the needs and goals of the Townships. These include the promotion of industrial job creation, serving the growing need for supply chain operations and the significant increase in the ratable value of these underutilized properties. The properties that include the former Mall and land behind it were specifically targeted for industrial development due to their location along State Route 22 and proximity to Route 78, access to existing utilities and transportation infrastructure and the ability to promote "smart" and "green" development initiatives through the Redevelopment process.

The Townships of Lopatcong and Pohatcong stand available to answer any questions from the Highlands Council. We are hopeful the Council sees fit to approve this Petition for Highlands Redevelopment Area Designation for these properties.

Sincerely,

William Wright Mayor, Township of Lopatcong

Township of Pohatcong

David Slack Mayor,