

Hudson County, North Bergen Township  
James Braddock Park (Block 437.02 Lot 1)  
Pre-K School Trailers /Diversion of Green Acres-Encumbered Parkland  
State House Commission (SHC) File #s 0900005 (County), 0908003 (Township)  
Pre-Application Completeness Review, Part 2

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Green Acres Program staff have completed a review of the diversion pre-application (dated January 26, 2016) and the response to the April 12, 2016 Green Acres Pre-Application Completeness Review, Part 1 memo (dated August 19, 2016) (“the Response Document”) for the above referenced diversion applications. At this time, the pre-application remains incomplete. The application was reviewed at an in-house meeting of NJDEP staff on October 13, 2016. Green Acres staff also conducted a site visit to James Braddock Park and to two of the three proposed replacement properties.

The following items (listed in the order presented in the major diversion pre-application checklist) must be submitted and deemed complete before we can authorize the applicants to proceed to a final application:

**1. Description of the proposed diversion/disposal**

**Acreage of the parkland proposed for disposal or diversion (N.J.A.C. 7:36-26.9(d)1ii)**

Please revise the acreage of parkland comprising the diversion based on the below analysis.

Tot Lot and Parcel Immediately Adjacent to the Tot Lot- North Bergen Township and Hudson County (“the Applicants”) indicated in the August 19, 2016 Response Document that the tot lot used by the Pre-K school children remains available for general public use as a shared park facility when preschool is not in session. Accordingly, the Applicants assert that the area occupied by the tot lot should not be considered part of the diversion. However, we have been made aware of a “no trespassing” sign and other signage indicating that the tot lot is property of the Board of Education open during school hours only. The signs were apparent in a photograph dated September 3, 2016. Although the signs were not evident during a site visit on October 27<sup>th</sup>, the facility, which is fenced and gated, did not appear open to the public. This use constitutes a diversion of parkland and must be included in the diversion application.

In addition, we agree with those commenters who have asserted that removing the signs in this area will not remove the tot lot from the area of diversion. Given the fencing and gate, the tot lot is clearly part of the school facilities and not the park facilities. It is also our understanding that the tot lot was installed to meet State requirements for the preschool

facilities. Therefore, signage or not, we consider the tot lot to be part of the diverted area.

The portion of the entrance immediately adjacent to the tot lot, which is identified as “Parcel 4” on the map entitled “Survey Diversion Site” contained in the January 26, 2016 pre-application submission should also be added to the diversion area.

Pump Station Wet Well and Future Sewer Connection – The Response Document clarifies that what was previously referred to as a septic holding tank in the pre-application is a pump station wet well. The wet well, which pre-dates the Pre-K temporary classroom units (“TCUs”) at James Braddock Park, is located outside of the proposed diversion area, west of the track oval at Bruin Stadium, and receives both park user and Pre-K TCU sewage flow. The Response Document contains a letter from Derek McGrath, P.E. of Boswell McClave Engineering and a document entitled “Hudson County Wastewater Management Plan for Inclusion in the Northeast Water Quality Management Plan Watershed Management Area 5” to support this conclusion. In the letter, dated August 1, 2016, Mr. McGrath states that the pump station system benefits not only the school facility but also park facilities. He cites the adopted Wastewater Management Plan and resolution passed by the North Bergen Municipal Utilities Authority (June 11, 2008) as proof of the same. However, staff have not found clear documentation of the dual use in these referenced materials. In order to verify that the wet well is, in fact, used for park purposes, please reference the section of the Wastewater Management Plan and/or language in the Resolution that addresses this issue.

Entrance Drive and Parking Lot – The Response Document confirms that the entrance drive will not be widened and is used both by school personnel and park visitors. In March 2016, we received a letter from Chris Pianese, North Bergen Township Administrator, responding to concerns we raised about signage on the gate to the parking lot at the end of the entrance drive. At the time, the sign stated that entrance after school hours or when the gates are locked is prohibited. Although the sign had been posted for many years, Mr. Pianese stated that the parking lot has been open to the public from 8:45 am to 9:00 pm. However, he agreed that the sign would be taken down to avoid public confusion and ensure that the public had access not only during but after school hours. We received documentation, including a photograph dated September 3, 2016, showing the sign on the gated entrance to the parking lot. However, during the October 27<sup>th</sup> Green Acres site visit, we found the parking lot to be open and available for public use at 10:30 a.m. and did not notice the above-referenced sign. Please ensure that the public continues to have reasonable access to the parking area and that no signage to the contrary

is posted. If not, the parking lot will be considered part of the diversion area.

Please also be reminded that the Green Acres Program directed North Bergen Township to modify the sign posted at the stadium field adjacent to the TCUs to include a phone number or other way of contacting North Bergen Township regarding use of the field by permit. In accordance with Green Acres Program rules, the local government unit must post at a funded facility the conditions and fees, if any, for its use or a phone number and web address (if available) by which a user can obtain information about the conditions and fees that apply (N.J.A.C. 7:36-25.10(f)). I had spoken to Mr. Sellini about this in 2015 and also raised this issue in a follow-up email to Mr. Pianese and Susan McCurrie, Assistant County Counsel, on February 25, 2016. A photograph dated September 3, 2016 showed a sign on the field stating “KEEP OFF THE FIELD – use by permit or authorization only,” with no further information provided. The sign at the entrance to the parking lot also states that the field is to be used by permit only. Please make sure that the additional information cited above is provided at both locations in order for the Applicants to remain in compliance with Green Acres rules.

**□ Purpose of proposed disposal/diversion, including the intended future use and owner of the parkland proposed for disposal/diversion (N.J.A.C. 7:36-26.9(d)1iii)**

As discussed above, the diverted area must also include the tot lot and adjacent “Parcel 4” and, if applicable, the wet well. This section of the application must be updated as it pertains to those areas.

**□ Description of how the parkland is proposed to be diverted (N.J.A.C. 7:36-26.9(d)1iv)**

As background, please specify the number of TCUs occupying the site. Please also confirm whether there are trailers/structures devoted to school administrative services on site.

The diversion pre-application, dated January 26, 2016, describes this diversion as continuing under one of two possible scenarios: 1) the TCUs remain on site at James Braddock Park until grant funding is available to construct a permanent school facility to replace it; or 2) If enough funding is available to construct an addition to existing schools in the Township, then the Pre-K school could relocate off James Braddock Park.

The more recent Response Document states that a permanent on-site modular school is no longer under consideration because the North Bergen Township Board of Education (“BOE”) is pursuing a purchase or lease option

for the Hudson County High Tech High School properties in North Bergen (Block 458.01 Lot 1, Block 458 Lot 1 and Block 458.01 Lot 6).

According to the Response Document, the BOE's intent is to relocate the existing high school students to a retrofitted High Tech High School plant, move the middle school students into the public high school, and then house the early childhood students in other existing school facilities. According to the Response Document, this proposal is consistent with the BOE's long range plan approved by the New Jersey Department of Education. It is our understanding that the earliest that the Pre-K students may relocate is in time for the 2019/2020 school year, one year following the opening of the new High Tech High School (the 2018-2019 school year being the earliest time frame expected for the new school to open).

Because the TCUs have occupied a portion of James Braddock Park since 2001 without the prior approval from the State House Commission, the diversion application is classified as "after-the-fact" (referred to as "legalizing past diversions or disposals" in the Green Acres Program rules), necessitating appropriate compensation. However, since there appears to be a viable alternative available in the near future, the TCUs must be removed and Braddock Park restored when the alternative solution becomes available.

**□ If applicable, a copy of the draft lease or use agreement and statement of total compensation proposed to be received by the applicant for the lease or use agreement (N.J.A.C. 7:36-26.9(d)1vi)**

The January 26, 2016 pre-application contains a proposed 19-year lease (with four additional 19-year renewal terms) between Hudson County and the Township of North Bergen for the continued use of a portion of James Braddock Park for public school purposes. The lease agreement must be revised and resubmitted to address the following parameters:

- It is our understanding that the tenant would be the North Bergen Township Board of Education. Please confirm that this is the case, and if not, please clarify.
- The Applicants have indicated that the earliest time frame for the relocation of the High Tech High School students to a new High School in Secaucus is the 2018-2019 school year. The Pre-K students would then be able to relocate off Braddock Park once the existing High Tech High School in North Bergen Township is retrofitted (which is expected to occur in time for the 2019-2020 school year.) Accordingly, we would consider a lease term that expires no later than August 31, 2021, which is intended to provide an additional cushion to find another temporary or permanent site in the event construction schedules prevent relocation of the Pre-K school children by September of 2020 or should the High Tech High School alternative not come to fruition.

- The annual lease payments must be based on fair market value as determined by appraisals reviewed and accepted by the Green Acres Program, and include an annual escalator based on the consumer price index. For your information, if we do approve the Applications, we intend to require a substantial rent increase effective September 1, 2020 in the event that the Pre-K students are not relocated for the start of the 2019-2020 school year. While we do not want to have to revisit this issue with the State House Commission if the project schedule slips, and so will approve a lease term up to August 31, 2021, we want to give the Applicants every incentive to vacate the park by the start of the 2019-2020 school year (as the Applicants say they should be able to do.)
- The fair market value-based annual lease payments must be retroactive to January 1, 2014 (the expiration of the 2.5-year temporary lease agreement previously authorized by the Green Acres Program.) To the extent that payments have continued to be made following the expiration of the temporary lease agreement authorized by the Green Acres Program, they may require adjustments to ensure that the payments are based on fair market value as determined by appraisals reviewed and accepted by the Green Acres Program. If payments have been made since January 1, 2014, please provide an accounting of these payments along with proof of where the payments were deposited and what use, if any, has been made of the payments.
- The lease agreement must specify that the lease payments will be used by Hudson County for operating, maintenance or capital expenses related to its funded parklands or to its recreation program as a whole.
- The lease agreement must require James Braddock Park to be restored to its pre-lease condition or to an improved condition acceptable to the Green Acres Program no later than three months following removal of the TCUs.
- The lease agreement must require the former softball practice field which was replaced by the TCUs, or a reasonably equivalent recreational facility, to be constructed at James Braddock Park or at another park located in North Bergen Township (or elsewhere in the County) no later than three months following removal of the TCUs. The Green Acres Program will need to approve the scope and/or location of any project not involving replacement of the practice field in its original location.

As noted above, the lease payments must be retroactive to January 1, 2014 and must be used for operating, maintenance or capital expenses related to the County's funded parklands or its recreation program as a whole. However, we also need documentation that the lease payments made during the 2.5-year period previously authorized by the Green Acres Program pursuant to *N.J.A.C. 7:26-25.14* were used for the same purposes. If not,

then the compensation package must include additional funds commensurate with the lease payments approved in connection with the temporary lease, to be set aside for these purposes.

- **If the proposed disposal/diversion involves the construction of a building or infrastructure on parkland, a set of plans and specifications for the construction (N.J.A.C. 7:36-26.9(d)1vii)**

Since a permanent structure will not be constructed on site and the existing diversion will be removed, no additional information is required at this time.

- **A detailed description of any recreational facilities and/or activities to be affected by the proposed disposal/diversion of parkland and an explanation of how they will be affected (N.J.A.C. 7:36-26.9(d)1ix)**

In addition to the prior removal of a softball practice field, if any of the additional diversion parcels noted under the “description of acreage” cited above contain recreational facilities, then a description of any other lost recreational facilities must be provided.

## **2. Alternatives Analysis**

In response to the diversion pre-application, the Green Acres Program directed the Applicants to provide additional information concerning alternatives. The Applicants’ response is contained in the Response Document dated August 19, 2016. While the Green Acres Program has determined that the feasibility of a number of these alternatives is still inconclusive due to lack of sufficient information, the Applicants have indicated that they are in fact pursuing a viable alternative site that would enable them to remove the TCUs from James Braddock Park. Since a permanent modular school on James Braddock Park is no longer under consideration, nor is a long-term lease arrangement for the TCUs to remain on site, additional information concerning alternatives is not necessary at this time.

## **3. Environmental Assessment Report**

The Environmental Assessment Report is acceptable, recognizing, however, that 1) the diverted property is expanding slightly in acreage and 2) if any of the replacement properties change, the environmental assessment must be amended.

#### 4. Land Valuation Forms

##### Block 437.02 Lot 1, James Braddock Park

- The land valuation form estimates the fair market value of the diverted property at \$1,181,000. Please note that upon approval to proceed to final application, the applicants must provide two appraisals for properties with an estimated value equal to or greater than \$250,000 (*N.J.A.C. 7:36-8.3*). The Green Acres Program should be consulted about the scope of the appraisal and the choice of the appraisers.
- As the Applicants have been advised, "yellow book" appraisals will be necessary to comply with National Park Service requirements for conversions under the Federal Land and Water Conservation Program.

##### Block 27 Lot 27, Paterson Plank Road Replacement Property

- Although the land valuation form for this proposed replacement property estimates fair market value at \$2.5 million, Hudson County acquired it for \$1,675,000 on September 25, 2015. This discrepancy will need to be explained.
- Land purchased by a local government unit in whole or in part with funds from a dedicated county or municipal open space tax authorized under *N.J.S.A. 40:12-15.1* through *15.9* or with bonds financed with a dedicated open space tax is not eligible as replacement land (*N.J.A.C. 7:36-26.10(d)2ii(4)*). It is our understanding that Hudson County is using open space funding to pay for future park improvements at this location. Please verify that neither local nor county dedicated open space funding was used to *acquire* the property. (Please also see Item #5, Preliminary Compensation Proposal, for issues concerning property eligibility as replacement land).
- Upon approval to proceed to final application, the applicants must provide two appraisals for properties with an estimated value equal to or greater than \$250,000 (*N.J.A.C. 7:36-8.3*). The Green Acres Program should be consulted about the scope of the appraisal and the choice of the appraisers.
- "Yellow book" appraisals will be necessary to comply with National Park Service requirements for conversions, assuming the property is proposed as replacement land to address the Federal Land and Water Conservation Fund conversion application.

##### Block 437 Lots 2.01 and 2.02, River Road Replacement Property

- The land valuation forms estimate the fair market value of this proposed replacement property at \$657,400. The two parcels comprising the proposed River Road replacement property were acquired by Hudson County via condemnation in 2015 for \$730,000.

This discrepancy will need to be explained.

- Upon approval to proceed to final application, the applicants must provide two appraisals for properties valued at \$250,000 or greater. The Green Acres Program should be consulted about the scope of the appraisal and the choice of the appraisers.
- “Yellow book” appraisals will be necessary to comply with National Park Service requirements for conversions, assuming the property is proposed as replacement land to address the federal Land and Water Conservation Fund conversion application.

#### 14<sup>th</sup> Street Viaduct

This property does not appear to qualify as replacement land due to its prior dedication for recreation and conservation purposes. Please see Green Acres comments below under Item #5, Preliminary Compensation Proposal, for further detail.

### **5. Preliminary Compensation Proposal**

Under the temporary 2.5-year lease approved by Green Acres, which expired in 2014, North Bergen was obligated to make monthly lease payments to the County for the occupancy of a portion of Braddock Park by the Pre-K school. When the pre-application was filed for the diversion, the Applicants envisioned that the compensation for the past (unauthorized) use and proposed 19-year lease (with four 19-year terms of renewal) for the school would be in the form of replacement land (at a ratio somewhere between 2:1 and 5:1.)

Based on the Applicants’ decision to discontinue use of the Braddock Park site for the school by the 2019-2020 school year, it now appears that the appropriate compensation for the proposed diversion will be both replacement land (for the “after the fact,” unauthorized use of the site) and lease payments (for the period of time between the expiration of the 2.5-year temporary lease agreement previously authorized by the Green Acres Program and the vacation of the site by the Pre-K school.)

#### **Minimum Compensation Ratios for Lease or Use Agreement**

The compensation for the lease component of the proposed diversion must be based on fair market value (to be determined by appraisals) plus an annual escalator. For purposes of the proposed diversion, the lease term commenced on January 1, 2014 (when the Green Acres-approved temporary use agreement expired) and will extend through August 31, 2020 (the anticipated date for relocating the Pre-K school children for the start of the 2019-2020 school year.) If the relocation cannot happen by August 31, 2020, we intend to impose a substantial escalator to any rental payments between August 31, 2020 and August 31, 2021. The TCUs must be removed from James Braddock Park no



later than August 31, 2021.

#### **□ Minimum Compensation Ratios for Replacement Land**

For an after-the-fact diversion or disposal classified as “public,” replacement land acreage must usually be provided at a 5:1 ratio (*N.J.A.C. 7:36-26.10(j)*). However, the Green Acres Program rules allow for a reduction in this ratio, to not less than 2:1, if mitigating circumstances apply. The August 19, 2016 Response Document contains additional justification to support the Applicants’ January 26, 2016 pre-application request to consider mitigating circumstances for a reduction to 3:1. We acknowledge that a 3:1 ratio was discussed with Green Acres staff as part of the pre-application conference for this application, and that staff said we would consider such a reduction. Nevertheless, a reduction cannot be granted under our rules without sufficient justification. More to the point, there is no explanation as to why the applicants failed to seek approval for a diversion *in advance* of situating the TCUs on James Braddock Park. Please address that specific point while providing adequate justification as to why there should be a reduction in replacement land from the 5:1 ratio.

Please be aware that replacement land is the required form of compensation under the Green Acres Program rules for after-the-fact diversions. Green Acres is assigning the “after-the-fact” classification of this diversion to the time frame extending from the time in 2001, when the TCUs were placed on James Braddock Park, to the start date of the temporary use agreement approved by Green Acres (effective July 1, 2011).

Subsequent to the scoping hearing, we have received a number of public comments expressing concern about various aspects of the applications, including the quality, location and eligibility of the proposed replacement land. As outlined below, we share some of those concerns.

#### **14th Street Viaduct, Hoboken City, Hudson County**

According to the pre-application, on September 1, 2014, Hudson County adopted a resolution authorizing both the diversion and conversion of Braddock Park. The same resolution authorized a Memorandum of Understanding between Hudson County and North Bergen Township concerning the 14<sup>th</sup> Street Viaduct replacement parcel. Since the resolution was not submitted with the pre-application, we ask that you please provide a copy with the revised diversion pre-application.

The pre-application also notes that the 14<sup>th</sup> Street Viaduct replacement parcel was vacant and unimproved at that time. However, a press release issued by the Hudson County Executive’s office on July 7, 2014 states that park construction had already begun and that a pocket park should be completed by August of 2014. On July 8, 2014, the Applicants informed Green Acres of the

intended use of this property as replacement land, though it was not readily evident to Green Acres that parkland improvements were already underway.

Property is ineligible as replacement land if the land was purchased or developed by a local government unit for recreation and conservation purposes between its most recent time of receipt of Green Acres funding and the approval by the Commissioner and State House Commission of an application for the proposed disposal or diversion, except for land specifically identified by the applicant as replacement land at the time of its acquisition (*N.J.A.C. 7:36-26.10*).<sup>1</sup> Since official designation of the 14<sup>th</sup> Street Viaduct as replacement land did not occur until after construction of the park had begun, it is ineligible as replacement land for this diversion.

Block 437 Lots 2.01 and 2.02, River Road, North Bergen Township

Please note the following comments:

- The pre-application states that at this time, construction of new facilities is not anticipated on the proposed River Road replacement properties, although it does identify potential future improvements. It also notes that these parcels contain “heavy growth” and that maintenance will be consistent with that of the adjacent Bird Sanctuary. The Bird Sanctuary has been closed to the public for some time due to overgrowth of poison ivy and other vegetation. Hudson County is in the process of addressing this problem to enable the reopening of the Bird Sanctuary. To the extent that the County intends to maintain this property in a manner similar to that of the Bird Sanctuary, please describe how the anticipated future maintenance program will ensure that public access will be available.
- The pre-application states that these parcels may be developed for access to the existing North Hudson Park (aka James Braddock Park) Bird Sanctuary, as there is currently no other access to the County park from River Road. As you know, property encumbered with Green Acres restrictions must be used for recreation and conservation purposes. Use of parkland for other than these purposes would be considered a diversion or disposal of parkland. Given the property’s proximity to River Road, future improvements, such as parking, must be limited to park users. Although we have not seen any specific plan for future use of this property, we have a general concern that if parking is developed in the

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<sup>1</sup> Note that *N.J.A.C. 7:36-25.10* also disqualifies as replacement land, any land qualifying as parkland under *N.J.A.C. 7:36-25.3(f)*, which includes “Any evidence relating to any use of the property for recreation and conservation purposes by the public at or prior to the time of receipt of Green Acres funding that was acknowledged, acquiesced, encouraged, funded or supported by the local government unit, including whether recreation equipment was installed upon or other improvements were made to the property to facilitate use of the property for recreation and conservation purposes, by or with the authorization of the local government unit.”

future it will become overflow parking for surrounding private properties, particularly if parking is developed on the proposed replacement property without also installing a physical connection up the steep slope (by way of a trail or stairs) to the remainder of the Bird Sanctuary.

- The pre-application states that the replacement property itself is stable and well-drained and that no improvement plan for erosion and sediment control at the River Road replacement property site has been put forth. However, according to the Community Vision Plan for the Palisades Nature Preserve (American Planning Association, June 2014), the stream that runs down the Bird Sanctuary property floods the sidewalk on River Road in a location that appears to be in the vicinity of the replacement land. Please elaborate on whether any potential storm water runoff and/or erosion/sedimentation control measures are necessary in light of this information. (Technically, this information should be included in the Environmental Assessment portion of the pre-application)
- It has come to our attention that the owner of the River Road properties may be pursuing legal action against the County's condemnation of the property for park purposes. Please clarify whether this information is correct and whether it presents a potential road block in terms of replacement land availability.
- Property is ineligible as replacement land if the land was purchased or developed by a local government unit for recreation and conservation purposes between its most recent time of receipt of Green Acres funding and the approval by the Commissioner and State House Commission of an application for the proposed disposal or diversion, except for land specifically identified by the applicant as replacement land at the time of its acquisition (*N.J.A.C. 7:36-26.10*). Please provide proof that this property has not been officially designated for recreation and conservation purposes or else if it has, that it was earmarked specifically as replacement land for the diversion at the time of or prior to its acquisition by Hudson County.

Block 27 Lot 27, Paterson Plank Road, North Bergen Township

The County of Hudson 2016 Open Space Advisory Board Recommendations Report identifies Block 27 Lot 27 as a new municipal park to be added to the ROSI, and to be developed with park amenities. Hudson County Resolution No. 501-9-2016 authorizes \$300,000 in County funding toward Paterson Plank Park development. Furthermore, it recommends \$300,000 in County funds to implement the park development recommendations.

Property is ineligible as replacement land if the land was purchased or developed by a local government unit for recreation and conservation purposes between its

most recent time of receipt of Green Acres funding and the approval by the Commissioner and State House Commission of an application for the proposed disposal or diversion, except for land specifically identified by the applicant as replacement land at the time of its acquisition (*N.J.A.C. 7:36-26.10*). Please provide documentation that that the property was earmarked specifically as replacement land for the diversion at the time of or prior to its acquisition or development by Hudson County.

**Minimum Compensation for a Loss of any Recreation or Conservation Facilities**

Upon removal of the TCUs, the Applicants must compensate for the loss of the practice softball field which was removed at the time that the TCUs were installed. This requirement can be met either by providing replacement facilities of reasonably equivalent usefulness, size, and quality on site at James Braddock Park or in a reasonably proximate location on another park. Please submit a proposal for replacement facilities that meets the requirements of *N.J.A.C. 7:36-26.10(c)3*.

**Minimum Compensation for Tree Replacement**

The Applicants provided documentation from a NJ-approved forester indicating that the TCUs were installed in an area void of trees. It appears, based on a review of 1995 and 2015 aerial photography, that a similar conclusion would apply to the parking area and tot lot. Therefore, we concur that tree replacement requirements will not apply to this diversion application.

**Preliminary Assessment Report**

Please see three separate memos issued by Michael Buriani, Green Acres Program Supervising Environmental Specialist, regarding each of the three proposed replacement properties.

**6. A listing of all permits and approvals**

Please sign on the "Preparer" Line and resubmit.

**7. Copy of deeds for diverted and proposed replacement properties**

Block 437.021 Lot 1, James Braddock Park

The deed submitted for James Braddock Park (Deed Book 3281 Page 1162, recorded in Hudson County on August 2, 1979), indicates that the Park comprises 163 acres more or less and cites other deeds containing legal descriptions of the Park property. Current tax data indicates that the Park consists of 174 acres. Please confirm that the submitted deed encompasses

the entirety of the Park, or more specifically, is the vesting deed inclusive of the area subject to the diversion.

Block 27 Lot 27, Paterson Plank Road

Please submit a recorded copy of the deed.

**8. Maps**

- Please resubmit maps reflecting any expansion in the diverted area and updated replacement land proposal.

**9. Confirmation of the Scoping Hearing**

All required documentation concerning noticing, transcript of the hearing and a summary of public comments was submitted with the pre-application submission of January 26, 2016. Since the hearing date changed from the initially noticed hearing of October 21, 2014 to Nov 5, 2014, please send copies of the written public notices sent to County and municipal government entities in connection with the *originally* scheduled hearing to ensure that all required information was included in that letter.

Prepared by Caroline Armstrong, Green Acres Program  
December 20, 2016