

Planning & Real Estate Consultants

December 14, 2020

Ms. Donna Rendeiro
Executive Director, State Office of Planning Advocacy
Secretary, New Jersey State Planning Commission
Department of State
225 W. State Street
P.O. Box 820
Trenton, NJ 08625-0820

RE: Proposed State Plan Policy Map Amendment
Holmdel Township, Monmouth County, New Jersey
Response to 11/24/20 Plan Implementation Committee Meeting

Dear Ms. Rendeiro:

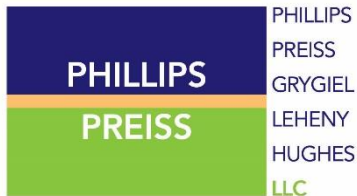
As you are aware, The Walters Group (the "Petitioner") is seeking a State Plan Policy Map amendment (the "Petition") to change the designation of a 3.87-acre site within Holmdel Township from Suburban Planning Area (PA-2) to Metropolitan Planning Area (PA-1) to facilitate the construction of affordable housing on the site with the support of Holmdel Township. Since the initial submission of the Petition, your office has recommended the expansion of the proposed map amendment area to include a larger area within the Township of Holmdel in order to ensure greater consistency with the State Development and Redevelopment Plan (SDRP). The Township of Hazlet, as objectors to the petition, subsequently proposed a further expansion of the map amendment area, where the Metropolitan Planning Area (PA-1) would encompass nearly one-third of Holmdel's land area.

In my opinion as Township Planner for Holmdel, the PA-1 expansion proposed by Hazlet is inconsistent with the goals and objectives of the SDRP. This letter addresses the consistency of the separate PA-1 expansions proposed by the State Office of Planning Advocacy (OPA) and the Township of Hazlet in the context of the SDRP and the Township of Holmdel's planning goals.

Background

The Petition was reviewed by the Plan Implementation Committee at a meeting held November 24, 2020. At this time, the State Office of Planning Advocacy (OPA), under your direction, recommended the expansion of the Metropolitan Planning Area (PA-1) to include lands generally bounded by NJ Transit railroad tracks to the south, Holmdel's Labbe Park to the west, and the Township's boundaries to the north and west. OPA further recommended revisions of certain Critical Environment Site designations throughout Holmdel to better reflect existing built conditions in the Township.

At the November 24 Plan Implementation Committee meeting, James H. Gorman, Esq., Township Attorney for Hazlet, proposed expanding the Metropolitan Planning Area (PA-1) to encompass all lands in Holmdel north of the Garden State Parkway. A planning report was prepared by M. McKinley Mertz, PP, AICP, for the Township of Hazlet in support of the expanded proposal and providing rationale for same.



Planning & Real Estate Consultants

Much of Holmdel's development is concentrated in the area between the railroad tracks and the Township's northern boundary, which is located in the Suburban Planning Area (PA-2) and is generally similar to the adjacent Metropolitan Planning Area (PA-1) across Township borders in terms of land uses, densities, and environmental characteristics. However, the area to the south located between the Garden State Parkway and the railroad tracks is characterized by low-density single-family zoning, tracts of open space, and a lack of commercial development. Hazlet's proposal is substantially inconsistent with the SDRP due to its inclusion of this disparate area south of the railroad tracks, which is currently split between the Suburban Planning Area (PA-2) and the Environmentally Sensitive Planning Area (PA-5).

Discussion of PA-1 Expansion Area Proposed by OPA

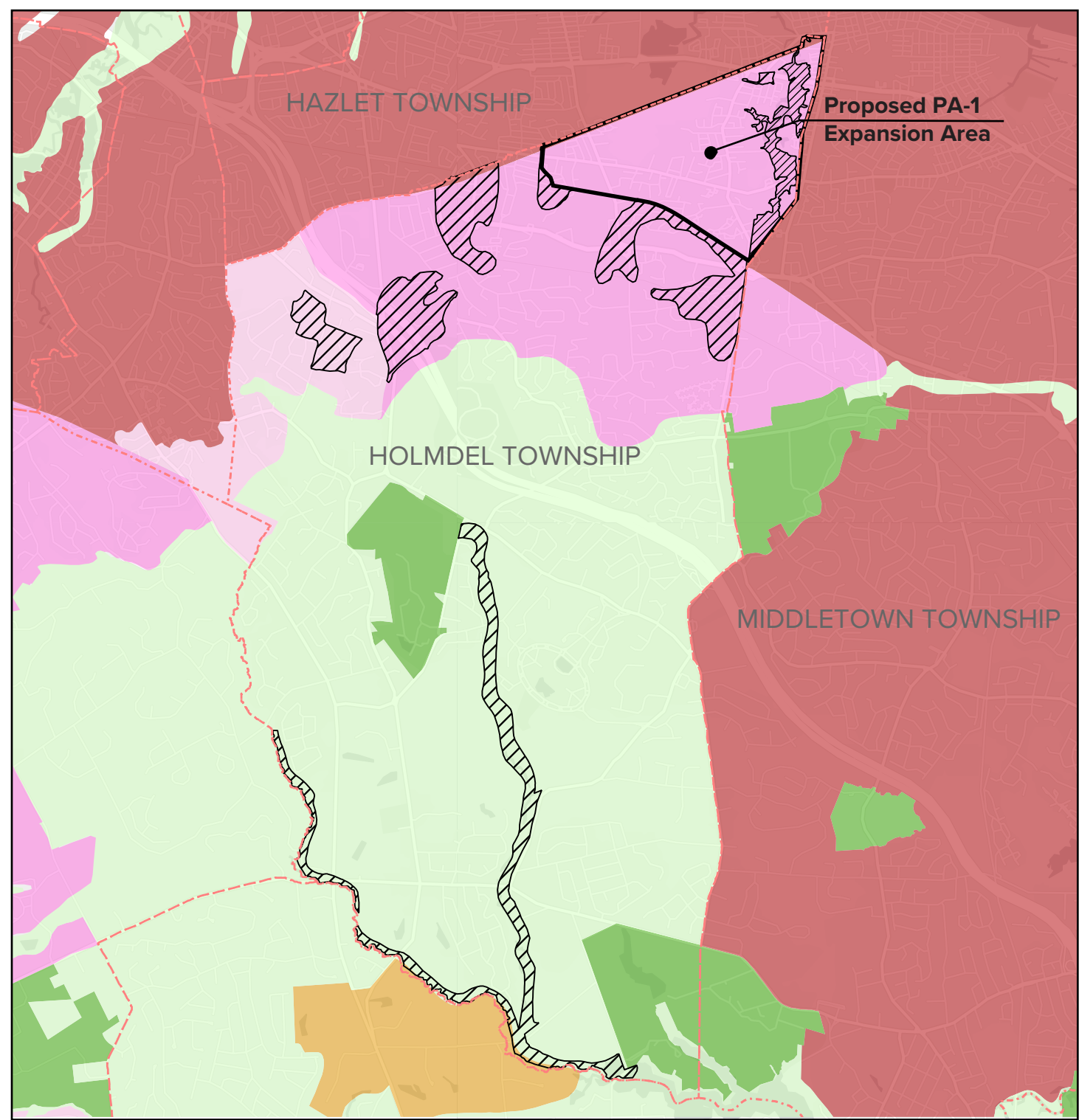
The area between the railroad tracks and Holmdel's northern boundaries, which is the subject of this proposed expansion, is the most densely developed portion of the Township. Existing land uses include large-scale retail and office development along the Route 35 corridor and townhouse and small-lot single-family development to the north and south of the highway. The few vacant properties or undeveloped lands in this area can generally be categorized as Township-owned open space, common open spaces subject to a conservation easement, or areas encumbered by wetlands. The boundaries of this proposed expansion area are shown in **Figure 1**.

The underlying zoning reflects the developed nature of this area. Commercial zones include the RO-3 Retail Office, TMHO-3 Transitional Mixed Highway Oriented, CI Commercial Industrial, and B-2 Neighborhood Business Districts. Residential zoning districts include R-TH Single-Family & Townhouse, R-30 Single-Family & Townhouse, and R-11 Single-Family & Townhouse.









All developed portions of this area are located within the sewer service area of the Bayshore Regional Utility Authority. Some wetlands are present near the Township's eastern boundary, generally in areas which OPA is proposing to designate as Critical Environmental Sites. Approximately 70 acres of this area is located within the jurisdiction of the Coastal Area Facility Review Act of 1973 (CAFRA) and subject to its requirements for Coastal Planning Areas established by the New Jersey Department of Environmental Protection (NJDEP).

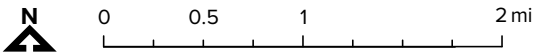
At present, this area is entirely located in the Suburban Planning Area (PA-2). There are a number of similarities between the SDRP planning goals of PA-2 and those of the Metropolitan Planning Area (PA-1). Both are considered "Smart Growth Areas," or locations where future development and redevelopment should be concentrated. Sensitive environmental features would be further protected by CAFRA jurisdictional requirements and Critical Environmental Site designations. The SDRP aims to concentrate redevelopment in PA-1; encourage development in locations that are well-situated with respect to existing public services; and discourage it where natural resources may be impaired, all of which are consistent with Township land use designations and goals.

Figure 1: Proposed OPA Map Amendment



State Planning Area Boundaries

- | | |
|---|--|
|  Metropolitan Planning Area (PA 1) |  Rural Planning Area (PA 4) |
|  Suburban Planning Area (PA 2) |  Envir. Sensitive (PA 5) |
|  Fringe Planning Area (PA 3) |  Parks & Natural Areas |
|  Critical Environmental/Historic Site |  Municipal Boundaries |



Prepared by Phillips Preiss Grygiel Leheny Hughes LLC 2020

SOURCE: New Jersey Department of Environmental Protection
NJDEP | NJ OPA | New Jersey Office of Information Technology (NJ OIT), Office of Geographic Information Systems
NJDEP. USEIA | NJ Department of Environmental Protection, Division of Information

Discussion of PA-1 Expansion Proposed by Hazlet

In contrast to the diverse land uses located north of the railroad tracks, the southerly portion of Hazlet's proposed PA-1 expansion area is characterized by one- and two-acre residential zoning, tracts of preserved farmland and forested land, and stream corridors. Per the State Plan Policy Map, approximately 30% of this area is designated as the Environmentally Sensitive Planning Area (PA-5), with the remainder designated as the Suburban Planning Area (PA-2). The boundaries of this proposed expansion area are shown in **Figure 2**.

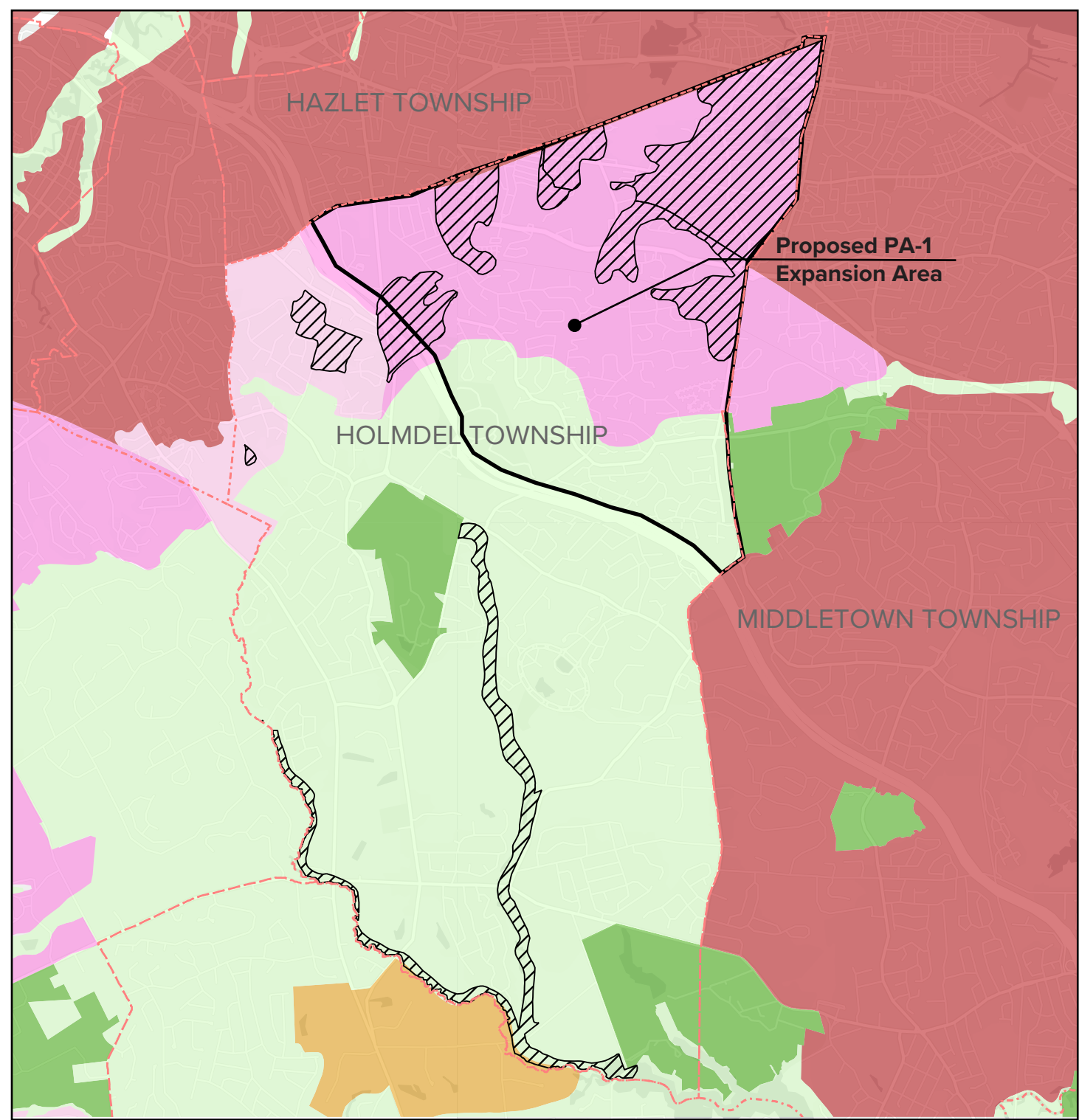
The most prevalent zones in the PA-2 portion of this area are the R-40A and R-40B Residence and Agriculture Districts, which permit only agricultural uses, municipal buildings, certain institutional uses, and single-family detached dwellings on 1-acre and 2.5-acre lots, respectively. Holmdel's zone plan does not contemplate office, retail, or industrial development in this area except for the 90-acre M Medical District, which encompasses Bayshore Medical Center and related development in the northwest corner of this area. The boundaries of this proposed expansion in relation to Holmdel's Zoning Map are shown in **Figure 3**.

Elsewhere in the PA-2 portion of this area, several existing residential subdivisions near Bayshore Medical Center are located in the R-15 and R-30 Single-Family Residence Districts, where lot sizes generally range from 0.30 to 0.75 acres and share some similarities with the neighborhoods to the north of the railroad tracks. However, they are not contiguous with OPA's proposed PA-1 expansion area north of the railroad tracks due to the presence of a stream corridor, public open space, and Critical Environmental Sites. The R-40A(2) district, which is located on the east side of the Township and developed with single-family detached condominiums, is also separated by stream corridors and Critical Environmental Sites.









The existing PA-2 designation in this area is appropriate and consistent with the SDRP. The area generally meets the delineation criteria for PA-2, including the availability of infrastructure capacity and systems such as sewer service and transportation networks and a land area contiguous to PA-1. While portions of this area may exceed the general criteria of a population density less than 1,000 people per square mile, the SDRP recognizes that "Suburban Planning Areas may, as they build out, achieve densities characteristic of Metropolitan Planning Areas." In terms of the SDRP's goals for each Planning Area, PA-2 is, like PA-1, intended to promote growth in compact forms and protect the character of existing stable communities. However, PA-2, unlike PA-1, is also intended to protect natural resources and reverse the current trend towards further sprawl. Redesignation as PA-1 would be inconsistent with the goals of the SDRP due the abundance of natural resources in this portion of PA-2, including preserved farmland on Centerville Road and stream corridors associated with East Creek, Flat Creek and Mahoras Brook.

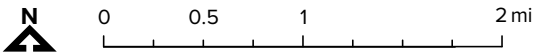
The southern portion of the amendment area proposed by Hazlet is located in the Environmentally Sensitive Planning Area (PA-5). Residential zoning in this area is limited to R-40A and R-40B. The remainder of the PA-5 is area is located within the Township's P Public Lands District, which includes a number of public and institutional

Figure 2: Proposed Hazlet Township Map Amendment



State Planning Area Boundaries

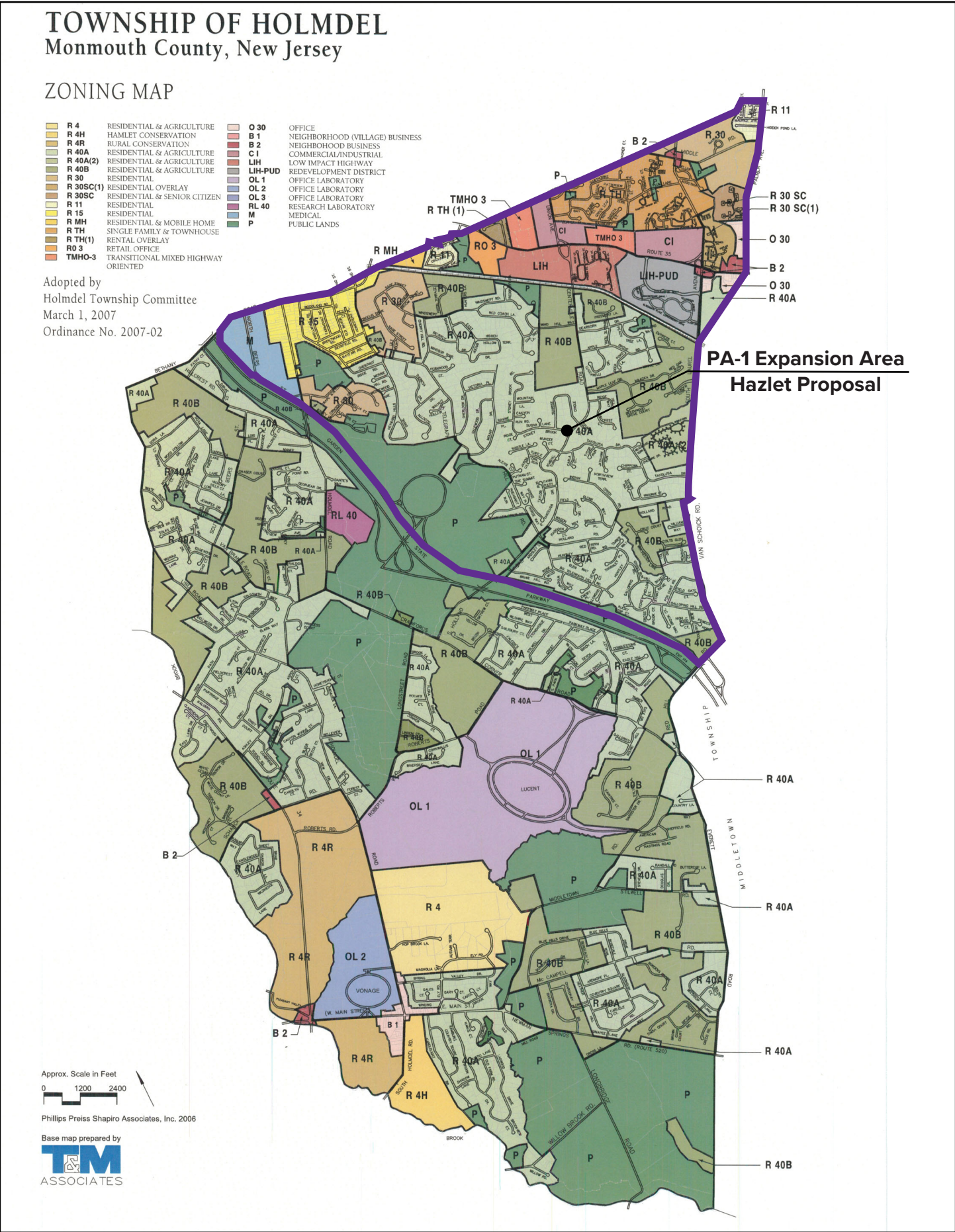
- | | |
|---|--|
|  Metropolitan Planning Area (PA 1) |  Rural Planning Area (PA 4) |
|  Suburban Planning Area (PA 2) |  Envir. Sensitive (PA 5) |
|  Fringe Planning Area (PA 3) |  Parks & Natural Areas |
|  Critical Environmental/Historic Site |  Municipal Boundaries |



Prepared by Phillips Preiss Grygiel Leheny Hughes LLC 2020

SOURCE: New Jersey Department of Environmental Protection
NJDEP | NJ OPA | New Jersey Office of Information Technology (NJ OIT), Office of Geographic Information Systems
NJDEP, USEIA | NJ Department of Environmental Protection, Division of Information

Figure 3: Township of Holmdel Zoning Map



uses located adjacent to the Garden State Parkway (e.g., PNC Bank Arts Center, New Jersey Vietnam Veterans' Memorial, and New Jersey State Police's Holmdel Station). The area also includes large tracts of mature forest and wetlands, many of which have been identified as wildlife habitat by the New Jersey Department of Environmental Protection ("NJDEP"). Several NJDEP-designated Category 1 Waters ("C1 Waters") are present and drain into this area.

The existing PA-5 designation continues to be consistent with the goals of both the SDRP and the Township of Holmdel. Redesignating this area as PA-1 would be particularly inconsistent given the existing environmental conditions in the area. Designation as PA-5 is specifically delineated by the presence of certain environmental features, including C1 Waters, certain plant and animal habitats, contiguous freshwater wetlands, and prime forested areas. Unlike PA-1 or PA-2, PA-5 designation is based on these underlying environmental conditions that may or may not reflect the existing built environment. The SDRP recognizes that while PA-5 areas may have existing development or utilities (as is the case in portions of this area), they remain especially sensitive to disturbance. This understanding is reflected in Holmdel's zoning and Master Plan policies, which have continually sought to recognize and protect environmentally sensitive areas of the Township.

Conclusion

Both OPA and the Township of Hazlet have set forth proposal to expand the Metropolitan Planning Area (PA-1) beyond the initial Petition. The expansion proposed by OPA includes most of the area in Holmdel north of the railroad tracks, which is presently located in the Suburban Planning Area (PA-2). The proposed expansion area encompasses the Route 35 corridor and consists of lands which are substantially similar to adjacent PA-1 areas in neighboring communities in terms of land uses, density, and consistency with the goals and objectives of the SDRP.

However, the expansion proposed by Hazlet's representatives seeks to redesignate approximately one-third of Holmdel's land area as PA-1. The inclusion of the area between the Garden State Parkway and the railroad tracks renders this proposal inconsistent with the goals of the SDRP. This area is split between PA-2 and the Environmentally Sensitive Planning Area (PA-5). The PA-2 area includes residential, medical, and open space uses that are more consistent with the goals of its existing designation as compared to PA-1. The PA-5 area is characterized by stream corridors and forested areas that could be actively endangered by future development, which is inconsistent with both the development goals of PA-1 and the Township of Holmdel.

Respectfully submitted,



Paul A. Phillips, P.P., AICP