

**MUNICIPAL CLERK  
& REGISTRAR**

Diane Pflugfelder, RMC/CMC

clerk@bethlehemnj.org



**ADDRESS:**  
405 Mine Road, Asbury, NJ 08802

**PHONE:** 908.735.4107 Ext. 101  
**FAX:** 908.735.0485

**OFFICE HOURS:**  
Monday – Friday  
8:30 am to 3:30 pm

February 18, 2010

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Eileen Swan  
Executive Director  
Highlands Water Protection/Planning Council  
100 North Road (Route 513)  
Chester, NJ 07930-2322

Laurence J. Baier  
Director, Division of Watershed Management  
NJ Department of Environmental Protection  
PO Box 418  
Trenton, NJ 08625-0418

Re: Proposed Development known as "Bloomsbury Industrial Park"  
Township of Franklin, Hunterdon County, Block 61, Lots 5 & 6

Dear Ms. Swan and Mr. Baier:

As elected officials of Bethlehem Township we are reaching out to the NJDEP and the Highlands Council to express objection and serious concerns with regard to the proposed development which is currently pending before the Franklin Township Planning Board. For reasons expressed in this letter we believe that the proposed development violates the provisions of the Highlands Act and request intervention by the NJDEP and the Highlands Council.

The Bloomsbury Industrial Park is a proposed development on Block 61 Lots 5 and 6 in Franklin Township, Warren County consisting of 1,440,000 square feet of warehouse and office space on 191.765 acres. The development is located on the banks of the Musconetcong River on the boundaries of Bethlehem Township and Bloomsbury Borough Hunterdon County and Greenwich Township, Warren County. The Regional Master Plan (RMP) identifies the property as located within the Conservation and Preservation Zones of the Planning Area.

The proposed development consists of six buildings each with a potable water well and individual septic system. In addition, a separate well will be installed to supply a 350,000 gallon water storage tank for fire protection. NJDEP well drilling permits are clearly required for installation of the 7 proposed wells. In addition, a water allocation permit may be required when the combined pumping rate of the 7 wells is considered. When the combined flow of the 6 septic systems is considered a NJPDES permit may also be required. According to the "Highlands Water Resources Volume II - Water Use And Availability Technical Report", prepared by State of New Jersey Highlands Water Protection and

Planning Council in support of the Highlands RMP, the proposed location and the immediate area in Greenwich Township and all of Bloomsbury are in a water deficit area. The Municipal Build Out Reports for Bloomsbury and Franklin Township state that where a HUC14 sub watershed is relied upon by more than one municipality for water supply, coordination will be needed to ensure that additional use does not exceed net water availability. N.J.A.C. 7:28-1.1(h) states that for the Planning Area, when consistent with its statutory and regulatory authority, the Department shall not issue any approval, authorization or permit that the Department determines in consultation with the Highlands Council, to be incompatible with the resource protection goals in the RMP. We believe that this requirement applies to all approvals, authorizations or permits, as stated, including the well drilling permits and all other authorizations and approvals required for this development, as well as, all offsite improvements triggered by the proposed development, such as the reconstruction of Route 632 which is within 300 feet of the Musconetcong River (C-1) and crosses two of its tributaries.

Much effort and taxpayer dollars have been expended by the State of New Jersey and local municipalities to protect the water resources of the Musconetcong Valley. Because the devastating impacts of the proposed development will negate much of this effort and because it is clear that the proposed development is incompatible with the resource protection goals in the RMP, the governing body of Bethlehem Township requests the NJDEP and the Highlands Council to implement the provisions of N.J.A.C. 7:28-1.1(h) by denying issuance of the well drilling permits and other applicable permits, approvals and authorizations for the proposed development and the required offsite improvements.

Sincerely,  
BETHLEHEM TOWNSHIP COMMITTEE

Gregory Glazar

John Graefe

John R. Jimenez

Jennifer McClurg

John Meehan