Dear Mr. Chairman and Council Members:

We are writing in response to the publication of the Draft Highlands Master Plan in hopes of convincing the Council and its staff to revise the draft Master Plan Mapping as it relates to Hope Township to reflect further information that we are providing to you as attached to this letter. We appreciate this opportunity to provide comment on the Draft Highlands Master Plan and look forward to working with the Council and its staff to ensure that the goals of the Council and the Township can be realized in partnership. The information provided has been compiled by our Planning Consultant, Paul Gleitz, P.P., AICP of Heyer, Gruel and Associates and has been reviewed and commented on by the Township Planning Board, Township Committee and Township Staff.

As way of background, Hope Township is an 18.7 square mile rural municipality located in central Warren County. It has a few small, localized areas of development surrounded by mostly rural, environmentally constrained land. Interstate Route 80 cuts through the northern part of the Township. According to the US Census, Hope Township's 2000 population was 1,891, a 10 percent increase from the 1990 population of 1,719. The existing pattern of development consists of a historical village center, a neighborhood commercial area, a planned office park, and low-density residential development. These developments are situated within a rural landscape of farmland, gentle hills, and forests.
Hope’s 1996 Master Plan addressed its land use needs with a community vision and sound planning principles. The Land Use Plan outlined a comprehensive framework to guide the physical, economic, environmental and social development of the Township. The 1995 Master Plan was re-examined in 2004 and 2006. Both noted that the principal objective of the Township is to retain its high quality rural environment and agricultural character. Hope has historically been the subject of limited development pressure and as such has seen very modest construction over the last 10 years. In order to implement the Town’s goals and objectives, Hope adopted LDAR and LDAR-H zone districts several years ago. These are low-density agricultural residential districts and low-density agricultural residential-historic districts. The original intent was to come up with a flexible low-density approach to subdivision design to protect the Township’s rural character.

Most of Hope is zoned as low-density residential, allowing for single-family, detached houses on very large lots. In the Low Density Agricultural Residential District and the Low Density Agricultural Residential-Historic District, the minimum lot sizes permitted are 80,000 square feet. Coupled with a maximum density of one unit per every five acres, Hope’s Zoning ordinance intends to maintain the rural quality of the great majority of the township. The Hamlet of Mt. Hermon, located in the western part of the Township at the intersection of Mt. Hermon and Locust Lake Roads, was specially designated as a hamlet in the New Jersey State Development and Redevelopment Plan. The Mt. Hermon Hamlet District was created to preserve the character of this area and the many historic structures in the vicinity. It has a low-density zoning similar to the Low Density Agricultural Residential districts. The same uses are permitted, but the minimum lot area is 5 acres. The Village of Hope was designated as a village by the New Jersey State Development and Redevelopment Plan because of its compact, pedestrian-oriented, and mixed-use design. The Hope Moravian Historical Center District is a zoning district meant to preserve the historic character of the village and allow for some expansion in the future. As such, it is a mixed-use district with single-family residences (some situated over commercial uses).

The commercial areas in Hope Township are limited to three areas. The first area is the mixed-use historic center of the Village of Hope and the Hope Moravian Historical Center District. The types of commercial uses permitted are restricted to preserve and enhance the historical character of the village. As of right uses include business and professional offices, retail and service establishments (such as grocery stores, delis, and banks), and automobile parking lots. Public schools are also allowed in this district.

The second commercial area is the Neighborhood Commercial District. This zone encompasses a small piece of land to the west of Rt. 521, north of the village and south of Rt. 80. The purpose of the zone is to provide for convenient shopping for the community in an accessible location with adequate parking. It is centrally located, and permitted uses include general and professional offices and buildings, retail shopping facilities and service establishments (such as bakeries and grocery stores), as well as parking
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Re: Hope Township’s Concerns Regarding Mapping of the Draft Highlands Master Plan

lots. The Planning Board must approve applications for restaurant or bar uses. The minimum lot area is 174,000 square feet and buildings may not be taller than two stories.

The planned office park district is located close to the intersection of Interstate Route 80 and County Route 521, at the Hope-Blairstown Road intersection. The 1996 Master Plan deemed this area and surrounding land suitable for future office development and other non-residential uses. It is intended for industries that have a small to moderate need for water, and that are unlikely to cause pollution or any environmental problem. As-of-right uses include business offices and agriculture. Conditional uses, with the approval of the Planning Board, include hotels and motels, restaurants, hospitals, automobile service stations, animal hospitals, research facilities, etc. Light industry and warehousing uses that can adhere to these restrictions may be allowed to occupy this area as well.

According to the 1996 Master Plan, approximately 11.5 square miles of Hope Township qualified as assessed farmland. This represented 62 percent of all of Hope’s land area. Almost half of all farmlands were on very large parcels of land greater than 75 acres. Farmland is encouraged and regulated in Hope Township. In four of seven zoning districts, an area covering the vast majority of the Township, agriculture is a permitted primary use. The Township Committee also passed a Right To Farm ordinance. It’s intent is to assure the continuation of commercial and home agricultural businesses. It protects farming activity as a conforming use, allows the sale of products at the farm, and mandates deed restrictions that force new residential owners of property adjacent to land used or suitable for agriculture to waive objections to such activity.

The Township is concerned that State Plan Endorsement could be jeopardized by failure to conform to the Highlands Master Plan and therefore jeopardize the Townships petition for substantive certification of it Housing Plan by COAH. COAH’s rules specifically mandate Townships like Hope to petition for State Plan Endorsement following petition for Substantive Certification from COAH.

The Township is also concerned with the possible devaluing of private property, both within the Preservation Area and Planning Area. The Township and its’ citizens are very concerned that many of the proposed land use measures within the Protection and Conservation Overlay zones will act as effective takings of the development potential of private property. The Township has crafted a well-conceived land use plan that carefully balances the preservation of natural and agricultural resources with traditional Hamlet and Village development patterns. The current Township land use plan relies on economic development through agriculture and clean office, research and service industries while providing for affordable housing. Any further diminution in land values or development potential through the regional planning process should be linked to an easement and fee simple acquisition program that is
well funded, fairly administered and reflects current property values. To do less would be to unfairly burden the property owners and citizens of each of the Highlands Municipalities that have already taken great strides to rationally craft locally accepted land use plans.

We also have further concerns regarding the proposed minimum lot size designations for residential development. These lot size designations seem arbitrary and we strongly advocate renewed scientific scrutiny of these minimum lot sizes. Finally, it is important to note that farmland preservation efforts have been successful in large part due to the inclusion of exception areas on protected farms. These exception areas allow for limited, inter-generational rural development and have been endorsed and approved by the State Agricultural Development Commission and County Agricultural Development Boards. We recommend that these exception areas continue to be honored.

We would suggest several alterations to the Land Use Capability Map and the Master Plan as they exist in draft form to address significant local concerns. These alterations are detailed below.

1. The Mount Hermon Hamlet is an existing hamlet approximately 13 acres in size. The hamlet contains a cluster of historic homes on small lots located at the intersection of Mt. Hermon Road and Locust Lake Road. The Mount Herman zoning designation recognizes the special nature of old; crossroads type Hamlets that have existed in the Township for generations. This Hamlet has been designated as a center by the State Planning Commission since 1999. This Hamlet is entirely residential and the intention is to allow for the maintenance of this Hamlet as it is, with the ability to protect the historic nature of the area. We request that this area (Mount Hermon Hamlet) be designated as a special planning area to recognize the historic nature of the hamlet and to facilitate the continuing preservation and rehabilitation of these properties that may require increased flexibility with building and zoning requirements.

2. The Hope Moravian Historic Center encompasses the Village of Hope, approximately 70 acres in size. The Village of Hope serves the Township with a wide range of governmental, economic and community functions including an elementary school, a community center, a fire station, houses of worship, commercial establishments and professional offices. This creates a truly mixed use Village with a variety of small-scale commercial properties and residential properties. This Village has been designated as a center by the State Planning Commission since 1999. The intention is to allow for the maintenance of this Village as it is. We request that this area (Village of Hope) be designated as a special planning area to facilitate the future development or redevelopment of certain neighborhood commercial properties.

3. Planned Office Park – The Planned Office Park zone is intended to be the single most important area remaining for the long-term economic development of the Township. The area is centered
at the crossroads of Interstate 80 and Hope-Blairstown Road. The intention is to provide for clean ratables in close proximity to both the Interstate and a regional north south access road. The area is presently lightly developed, but represents the future for Hope in that it is anticipated that high quality moderate to large-scale office development is appropriate for the uplands. No POP development is proposed within the historic district boundaries, however access to Foundry Road is anticipated and the area is designated for service in the wastewater management plan. The Township appreciates the Council's intent of protecting remaining forest and habitat areas, however the Township is intent on identifying portions of the POP zone viable for development. The Township would be amenable to designating a smaller area as special planning area or creating additional development standards for the area for the purpose of habitat protection. This would require further study and cooperation between the Township and the Council and its staff. We request that this area (Planned Office Park) be designated as a special planning area to facilitate the development of portions of these remaining properties, consistent with the current POP zoning designation, with access to Hope Blairstown Road, Foundry Road, Dogwood Road, and Interstate 78.

4. Neighborhood Commercial - The NC Neighborhood Commercial zone is intended to provide for continuing opportunities for limited commercial development. We request that this area be designated as a special planning area, in conjunction with the adjacent POP zoning area.

5. Pre-teen and Family Amusement Park zone - There is an active amusement park, The Land of Make Believe along Great Meadows-Hope Road (Route 611). The current Highlands Master Plan LUCM designation for the amusement park is the Protection Zone. We are unsure how this planning designation will affect both the continued operation of the park and any future redevelopment of the site. The park is currently in operation, having celebrated its 50th anniversary in 2004. However, the Township may want to explore redevelopment options if the park ever ceases operation. We request that this area (Land of Make Believe Amusement Park) be designated as a special planning area to facilitate the future development or redevelopment of the site according to a public planning process.

6. Silver Lake Neighborhood - The Township has submitted a Third Round Housing Plan to COAH and is awaiting certification of its plan to provide low and moderate income housing in the Township. The Township will be satisfying its obligation with a Municipal Reconstruction Program. The Reconstruction Program, previously known as “gut rehabilitation”, will focus on replacing major systems within homes in the Township. The Township has an area known as Silver Lake that has traditional lake community development. The Township is currently in the process of completing a study to determine whether or not the area may be deemed an area in need of redevelopment/rehabilitation. Most of the housing stock is older and in serious disrepair, including failing septic systems. The program would provide at least $50,000 towards the
necessary replacement of any systems within the homes. Silver Lake is of great importance to
the Township as it is a part of its Third Round Housing Plan. It is also our understanding that the
Highlands Council is considering a Lake Community Zone for existing developed lake
communities. We would support such a designation and request that the Silver Lake community
be designated as such. We would support the drafting of standards that would help protect
community and recreation water resources while acknowledging the developed nature of the area
and the potential for continuing in-fill development. We request that this area be designated as a
special planning area to assist the Township in meeting its affordable housing obligation.

7. Critical Habitat Areas - The Highlands Master Plan considers nearly the entire Township to be
critical habitat, with the exception of a band along the western boundary of the Township. While
the Township is proud of its agricultural landscape and natural lands, it also supports nearly 700
households and nearly 2000 people that live and work in the area. The Township is
uncomfortable having the majority of the Township, including Village, Hamlet, commercial and
single family home development areas, designated as critical habitat and would prefer a more
judicious identification process. The Township would support that Critical Habitat Areas would
include wildlife management areas and protected open space. We recommend that these
resource areas recognized farmland preservation exception areas as well.

8. Forest Resource Areas - As stated in 7 above, the Highlands Master Plan considers the majority
of the Township to be forest resource areas. While the Township is proud of its agricultural
landscape and natural lands, it also supports nearly 700 households and nearly 2000 people that
live and work in the area. The Township is uncomfortable having large areas of the Township,
including Village, Hamlet, commercial and single family home development areas, designated as
forest resource areas and would prefer a more judicious identification process that includes
wildlife management areas, protected open space and a limited number of larger, forested
parcels that exclude single family home development areas. We recommend that these resource
areas recognized farmland preservation exception areas as well.

9. Agricultural Resource Areas - The Highlands Master Plan considers large areas of the Township
to be agricultural resource areas. While the Township is proud of its agricultural landscape and
natural lands, it also supports nearly 700 households and nearly 2000 people that live and work in
the area. The Township is uncomfortable having Village, Hamlet, commercial and single family
home development areas of the Township designated as agricultural resource areas and would
prefer a more judicious identification process that includes Warren County ADA areas, the
Township’s Farmland Preservation Project Areas, protected farmlands and larger agricultural
parcels that exclude single family home development areas. We would favor expanding the
Agricultural Resource Area to coincide with our Farmland Preservation Project Area 3 where it
does not. Farmland preservation efforts have been successful in large part due to the inclusion of
exception areas on protected farms. These exception areas allow for limited development and have been endorsed and approved by the State Agricultural Development Commission and County Agricultural Development Boards. We recommend that these exception areas continue to be honored.

The attached maps provide additional detail and support for our concerns. We would like to thank the Highlands Council and its staff for the efforts required to review and respond to our comments. We look forward to continued cooperation between the Council and local government to address these and other concerns.

Sincerely,

[Signature]

Timothy C. McDonough
Mayor

Enclosures
Corresponding Documents in Admin. Area