

CHRIS CHRISTIE

Governor

KIM GUADAGNO
Lt. Governor

State of New Jersey

Highlands Water Protection and Planning Council 100 North Road (Route 513) Chester, New Jersey 07930-2322 (908) 879-6737 (908) 879-4205 (fax) www.highlands.state.nj.us



JACK SCHRIER

EILEEN SWAN
Executive Director

March 15, 2010

The Honorable Kenneth Short Washington Township Morris 43 Schooley's Mountain Road Long Valley, NJ 07853

Subject: RMP Update and Map Adjustment Request

Dear Mayor Short:

This letter is to advise you that the Highlands Council has reviewed your requests for RMP Updates and Map Adjustments submitted through your initial Municipal Petition for Plan Conformance.

RMP Updates pertain to factual discrepancies regarding existing land conditions, the correction of which may, but will not necessarily result in a change of Highlands Land Use Capability Map (LUCM) Zone or Sub-Zone designation. The data used for the development of the LUCM Zones are from 2002 (for land use/land cover) or approximately 2005 (for utility service areas) and the current conditions may be different from the original period. The RMP Updates Program is designed to identify such changes and to incorporate the current information in the Highlands spatial database.

Map Adjustments are requests for a policy change in the LUCM Zone or Sub-Zone based on local planning considerations, regardless of the correctness of existing land condition. It is an appropriate means to address the requirements of a planned development or redevelopment activity that cannot be accomplished through a Highlands Act Exemption in accordance with N.J.S.A 13:20-28, a Public Health and Safety Waiver, an RMP Update, or a Highlands Redevelopment Area designation.

Finally, a qualifying area may be proposed for designation as a Highlands Center, which may incorporate a combination of RMP Updates, Map Adjustments, Highlands Redevelopment Area designations and other means of achieving a Center-based community that meets the policies and objectives of the RMP.

The municipality requested 11 RMP Updates or Map Adjustments. The enclosed responses provide details on the results of the Highlands Council's review. The Highlands Council found the petition and supporting materials provided information sufficient for processing one of these requests as RMP Update, which will be incorporated into the Highlands spatial database. Please

note that the updated information will not necessarily result in a change of LUCM Zone or Sub-Zone designation. A RMP Update Report incorporating the RMP Update will be provided, along with a determination of whether a change to the LUCM Zone resulted.

For two of the requests, the information provided on current and existing land conditions is consistent with that of the Highlands Council. These requests do not constitute an RMP Update. The municipality may propose to make use of other policies of the RMP to effect a policy change in LUCM Zone, including for example the Map Adjustment program or, for qualifying areas, a Highlands Center designation.

An additional eight requests require additional supporting information for the Highlands Council to appropriately review this request as an RMP Update, more. In some cases the request will be better addressed through Map Adjustments or Highlands Center designations. Instructions are provided in the attached responses regarding completion and submittal of an RMP Update Form or Map Adjustment and Highlands Center Designation Inquiry Forms available through the NJ Highlands Council Website.

In addition to the detailed responses, we have enclosed a Summary of Findings which addresses common issues regarding requests for RMP Updates or Map Adjustments. We ask that the municipality consider this Summary of Findings prior to submitting RMP Updates or Map Adjustments as it provides guidance on how requests are reviewed and alternative methods for policy changes to the existing LUCM Zone or Sub-Zone.

If the Municipality wishes to pursue these or additional RMP Updates, Map Adjustments or a Highlands Center designation, please complete and submit the appropriate form available through the NJ Highlands Council Website:

http://www.highlands.state.nj.us/njhighlands/planconformance/

If you need further assistance on updates and/or adjustments please contact Roger Keren, Director of GIS at (908) 879-6737 or email at roger.keren@highlands.state.nj.us.

The Highlands Council looks forward to continued collaboration with you as we continue Plan Conformance with the RMP. Should you have any questions or concerns with the foregoing, please contact me at (908) 879-6737.

Yours Sincerely,

Eileen Swan Executive Director

Encl. Detailed Responses Summary of Findings

c: David Banisch, Planner

Municipal Petition for Plan Conformance

Municipality: Washington Township, Morris County Date: March 12, 2010

RMP UPDATES/MAP ADJUSTMENTS MUNICIPAL RMP UPDATE REVIEW

 Municipal Request: Black Oak Golf Course property - Change from Protection Zone to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. In addition, the property may be eligible for a NJDEP Highlands Exemption Determination, (See D above). It appears that some disturbance of land has begun however, more information is necessary to delineate the extension of the existing development.

2. Municipal Request: ORI Zone – areas near Schooley's Mountain and Newburgh Roads - This area includes the Heath subdivision (a.k.a. US Home), which is a 360 unit residential subdivision, including 45 units of affordable housing. This area includes all lands in Washington Township Tax Block 19 and is surrounded in Washington Township by Existing Community-designated lands. Change overlay zone designation for all Planning Area lands lying west of Schooley's Mountain Road and north of Newburgh Road in Tax Block 19 from Conservation Zone to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, the property may be eligible for a Highlands Exemption (See D above). Finally, certain categories of Planning Area projects may be excluded from regulation under the Highlands Land Use Ordinance due to prior municipal approval. Where an RMP Update is not appropriate at this time, but a previously approved project is later constructed and changes the Land Use / Land Cover of the parcel, the municipality may submit an RMP Update at that time to reflect the new land use.

 Municipal Request: Mine Brook Golf Course property- The floodplain portion Block 3, Lot 21; located in the Preservation Area, is designated Existing Community on the LUCM. Change overlay zone designation for floodplain portion Block 3, Lot 21 from Existing Community to Protection Zone.

Findings: Municipal information provided on current and existing land conditions is consistent with that of the Highlands Council. The request does not constitute an RMP Update. The protection of Highlands Resources (e.g., Flood Plains) applies across all LUCM Zones (Preservation and Planning Areas), and development must conform through local development review and Highlands Project Review with requirements of the RMP and various NJDEP regulations (See F above). In addition, the intent of the municipal request may already be achieved by Preservation Area requirements (See C above).

Municipal Petition for Plan Conformance

4. Municipal Request: Areas near US 46 / Drakestown Road – OR Zoned Lands situated north and west of eastbound Route 46 and generally south of Drakestown Road are designated Protection Zone on the LUCM. These lands are partially developed for economic development uses, including a big-box Target Department Store, an automobile dealership and a radio station Block 4, Lots 7.05, 7.04 and 7.02 & 7.01 in the US 46 State Highway corridor. Change overlay zone designation on LUCM for all lands lying north of EB US 46 to the municipal boundary (Drakestown Road) from Protection Zone to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above).

5. Municipal Request: C-2 Parcels in US 48 Corridor – change all lands along Route 46 lying west of East Avenue to the Hackettstown municipal boundary to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of these properties may be eligible for a Highlands Exemption (See D above).

Municipal Request: Newburg Road / Esna Road Parcels – Proposed R-1-T Zone – this
transitional zoning designation calls for nonresidential office and neighborhood and community
uses. Change this area from Protection Zone to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

7. Municipal Request: Cucinella and West Morris Regional High School Properties – Change to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above) or, Highlands Area Land Use Ordinance or Local Municipal Ordinance (see B above). In addition, these properties may be eligible for a Highlands Exemption (See D above).

Municipal Petition for Plan Conformance

8. Municipal Request: Existing Neighborhoods - Change from Protection Zone to Existing Community. Numerous existing suburban neighborhoods throughout the Township are designated Protection Zone, which does not reflect the existing developed character of the community. Change from Protection and Conservation Zone to Existing Community Zone to recognize these neighborhoods with residentially developed parcels on lots less than 3-acres of land.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

9. Municipal Request: Beattystown area— Change to Existing Community Zone. This area along the Musconetcong River, in the northerly portion of the Township, adjacent to Beattystown is an existing wastewater treatment area, and includes existing developed nonresidential development, dependent on the existing wastewater treatment infrastructure. The existing development (since the 1940's) serves as a local employment center and includes existing nonresidential tax ratables, which should be acknowledged on the LUCM. These areas should be changed to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover and the Existing Parcels Currently Served with Waste Water Treatment Other Than Septic System(s) Sections on the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

 Municipal Request: Comb Fill South Landfill – designate these parcels "Highlands Redevelopment Areas"

Findings: Municipal information submitted is sufficient for processing an RMP Update and will be incorporated into the Highlands spatial database. Please note that the updated information will not necessarily result in a change of Highlands Land Use Capability Map (LUCM) Zone or Sub-Zone designation. A RMP Update Report incorporating the RMP Update will be provided, along with a determination of whether a change to the LUCM Zone resulted. In addition, as suggested by the municipality, the municipality may wish to consider proposing a Highlands Redevelopment Area designation for this property if the proposed redevelopment is not consistent with the current RMP LUCZ (See E above). The designation of a Highlands Redevelopment Area cannot be achieved through an RMP Update, but rather requires a site-specific application. In addition, this property may be eligible for a Highlands Exemption (See D above).

11. Municipal Request: Cleveland Industrial Chemical – designate these parcels "Highlands Redevelopment Areas".

Municipal Petition for Plan Conformance

Findings: Municipal information provided on current and existing land conditions is consistent with that of the Highlands Council. The request does not constitute an RMP Update. However, the municipality may propose to make use of other policies of the RMP to effect a policy change in LUCM Zone, including the Map Adjustment program, (See A above) or, as suggested by the municipality, the municipality may wish to consider proposing a Highlands Redevelopment Area designation for this property if the proposed redevelopment is not consistent with the current RMP LUCZ (See E above). The designation of a Highlands Redevelopment Area cannot be achieved through an RMP Update, but rather requires a site-specific application. In addition, this property may be eligible for a Highlands Exemption (See D above).



CHRIS CHRISTIE

Governor

KIM GUADAGNO
Lt. Governor

State of New Jersey

Highlands Water Protection and Planning Council 100 North Road (Route 513) Chester, New Jersey 07930-2322 (908) 879-6737 (908) 879-4205 (fax) www.highlands.state.nj.us



JACK SCHRIER

EILEEN SWAN
Executive Director

March 15, 2010

The Honorable Kenneth Short Washington Township Morris 43 Schooley's Mountain Road Long Valley, NJ 07853

Subject: RMP Update and Map Adjustment Request

Dear Mayor Short:

This letter is to advise you that the Highlands Council has reviewed your requests for RMP Updates and Map Adjustments submitted through your initial Municipal Petition for Plan Conformance.

RMP Updates pertain to factual discrepancies regarding existing land conditions, the correction of which may, but will not necessarily result in a change of Highlands Land Use Capability Map (LUCM) Zone or Sub-Zone designation. The data used for the development of the LUCM Zones are from 2002 (for land use/land cover) or approximately 2005 (for utility service areas) and the current conditions may be different from the original period. The RMP Updates Program is designed to identify such changes and to incorporate the current information in the Highlands spatial database.

Map Adjustments are requests for a policy change in the LUCM Zone or Sub-Zone based on local planning considerations, regardless of the correctness of existing land condition. It is an appropriate means to address the requirements of a planned development or redevelopment activity that cannot be accomplished through a Highlands Act Exemption in accordance with N.J.S.A 13:20-28, a Public Health and Safety Waiver, an RMP Update, or a Highlands Redevelopment Area designation.

Finally, a qualifying area may be proposed for designation as a Highlands Center, which may incorporate a combination of RMP Updates, Map Adjustments, Highlands Redevelopment Area designations and other means of achieving a Center-based community that meets the policies and objectives of the RMP.

The municipality requested 11 RMP Updates or Map Adjustments. The enclosed responses provide details on the results of the Highlands Council's review. The Highlands Council found the petition and supporting materials provided information sufficient for processing one of these requests as RMP Update, which will be incorporated into the Highlands spatial database. Please

note that the updated information will not necessarily result in a change of LUCM Zone or Sub-Zone designation. A RMP Update Report incorporating the RMP Update will be provided, along with a determination of whether a change to the LUCM Zone resulted.

For two of the requests, the information provided on current and existing land conditions is consistent with that of the Highlands Council. These requests do not constitute an RMP Update. The municipality may propose to make use of other policies of the RMP to effect a policy change in LUCM Zone, including for example the Map Adjustment program or, for qualifying areas, a Highlands Center designation.

An additional eight requests require additional supporting information for the Highlands Council to appropriately review this request as an RMP Update, more. In some cases the request will be better addressed through Map Adjustments or Highlands Center designations. Instructions are provided in the attached responses regarding completion and submittal of an RMP Update Form or Map Adjustment and Highlands Center Designation Inquiry Forms available through the NJ Highlands Council Website.

In addition to the detailed responses, we have enclosed a Summary of Findings which addresses common issues regarding requests for RMP Updates or Map Adjustments. We ask that the municipality consider this Summary of Findings prior to submitting RMP Updates or Map Adjustments as it provides guidance on how requests are reviewed and alternative methods for policy changes to the existing LUCM Zone or Sub-Zone.

If the Municipality wishes to pursue these or additional RMP Updates, Map Adjustments or a Highlands Center designation, please complete and submit the appropriate form available through the NJ Highlands Council Website:

http://www.highlands.state.nj.us/njhighlands/planconformance/

If you need further assistance on updates and/or adjustments please contact Roger Keren, Director of GIS at (908) 879-6737 or email at roger.keren@highlands.state.nj.us.

The Highlands Council looks forward to continued collaboration with you as we continue Plan Conformance with the RMP. Should you have any questions or concerns with the foregoing, please contact me at (908) 879-6737.

Yours Sincerely,

Eileen Swan Executive Director

Encl. Detailed Responses Summary of Findings

c: David Banisch, Planner

Municipal Petition for Plan Conformance

Municipality: Washington Township, Morris County Date: March 12, 2010

RMP UPDATES/MAP ADJUSTMENTS MUNICIPAL RMP UPDATE REVIEW

 Municipal Request: Black Oak Golf Course property - Change from Protection Zone to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. In addition, the property may be eligible for a NJDEP Highlands Exemption Determination, (See D above). It appears that some disturbance of land has begun however, more information is necessary to delineate the extension of the existing development.

2. Municipal Request: ORI Zone – areas near Schooley's Mountain and Newburgh Roads - This area includes the Heath subdivision (a.k.a. US Home), which is a 360 unit residential subdivision, including 45 units of affordable housing. This area includes all lands in Washington Township Tax Block 19 and is surrounded in Washington Township by Existing Community-designated lands. Change overlay zone designation for all Planning Area lands lying west of Schooley's Mountain Road and north of Newburgh Road in Tax Block 19 from Conservation Zone to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, the property may be eligible for a Highlands Exemption (See D above). Finally, certain categories of Planning Area projects may be excluded from regulation under the Highlands Land Use Ordinance due to prior municipal approval. Where an RMP Update is not appropriate at this time, but a previously approved project is later constructed and changes the Land Use / Land Cover of the parcel, the municipality may submit an RMP Update at that time to reflect the new land use.

 Municipal Request: Mine Brook Golf Course property- The floodplain portion Block 3, Lot 21; located in the Preservation Area, is designated Existing Community on the LUCM. Change overlay zone designation for floodplain portion Block 3, Lot 21 from Existing Community to Protection Zone.

Findings: Municipal information provided on current and existing land conditions is consistent with that of the Highlands Council. The request does not constitute an RMP Update. The protection of Highlands Resources (e.g., Flood Plains) applies across all LUCM Zones (Preservation and Planning Areas), and development must conform through local development review and Highlands Project Review with requirements of the RMP and various NJDEP regulations (See F above). In addition, the intent of the municipal request may already be achieved by Preservation Area requirements (See C above).

Municipal Petition for Plan Conformance

4. Municipal Request: Areas near US 46 / Drakestown Road – OR Zoned Lands situated north and west of eastbound Route 46 and generally south of Drakestown Road are designated Protection Zone on the LUCM. These lands are partially developed for economic development uses, including a big-box Target Department Store, an automobile dealership and a radio station Block 4, Lots 7.05, 7.04 and 7.02 & 7.01 in the US 46 State Highway corridor. Change overlay zone designation on LUCM for all lands lying north of EB US 46 to the municipal boundary (Drakestown Road) from Protection Zone to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above).

5. Municipal Request: C-2 Parcels in US 48 Corridor – change all lands along Route 46 lying west of East Avenue to the Hackettstown municipal boundary to Existing Community.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of these properties may be eligible for a Highlands Exemption (See D above).

Municipal Request: Newburg Road / Esna Road Parcels – Proposed R-1-T Zone – this
transitional zoning designation calls for nonresidential office and neighborhood and community
uses. Change this area from Protection Zone to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If these areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

7. Municipal Request: Cucinella and West Morris Regional High School Properties – Change to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above) or, Highlands Area Land Use Ordinance or Local Municipal Ordinance (see B above). In addition, these properties may be eligible for a Highlands Exemption (See D above).

Municipal Petition for Plan Conformance

8. Municipal Request: Existing Neighborhoods - Change from Protection Zone to Existing Community. Numerous existing suburban neighborhoods throughout the Township are designated Protection Zone, which does not reflect the existing developed character of the community. Change from Protection and Conservation Zone to Existing Community Zone to recognize these neighborhoods with residentially developed parcels on lots less than 3-acres of land.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover Section of the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

9. Municipal Request: Beattystown area— Change to Existing Community Zone. This area along the Musconetcong River, in the northerly portion of the Township, adjacent to Beattystown is an existing wastewater treatment area, and includes existing developed nonresidential development, dependent on the existing wastewater treatment infrastructure. The existing development (since the 1940's) serves as a local employment center and includes existing nonresidential tax ratables, which should be acknowledged on the LUCM. These areas should be changed to Existing Community Zone.

Findings: In order for the Highlands Council to appropriately review this request as an RMP Update, more supporting information is required. At a minimum, please complete the Existing Land Use / Land Cover and the Existing Parcels Currently Served with Waste Water Treatment Other Than Septic System(s) Sections on the RMP Update Form available through the NJ Highlands Council Website listed above. If any areas are not currently built, the municipality may make use of other policies of the RMP to propose a change in LUCM Zone, including the Map Adjustment program (see A above). In addition, some of the properties may be eligible for a Highlands Exemption (See D above).

 Municipal Request: Comb Fill South Landfill – designate these parcels "Highlands Redevelopment Areas"

Findings: Municipal information submitted is sufficient for processing an RMP Update and will be incorporated into the Highlands spatial database. Please note that the updated information will not necessarily result in a change of Highlands Land Use Capability Map (LUCM) Zone or Sub-Zone designation. A RMP Update Report incorporating the RMP Update will be provided, along with a determination of whether a change to the LUCM Zone resulted. In addition, as suggested by the municipality, the municipality may wish to consider proposing a Highlands Redevelopment Area designation for this property if the proposed redevelopment is not consistent with the current RMP LUCZ (See E above). The designation of a Highlands Redevelopment Area cannot be achieved through an RMP Update, but rather requires a site-specific application. In addition, this property may be eligible for a Highlands Exemption (See D above).

11. Municipal Request: Cleveland Industrial Chemical – designate these parcels "Highlands Redevelopment Areas".

Municipal Petition for Plan Conformance

Findings: Municipal information provided on current and existing land conditions is consistent with that of the Highlands Council. The request does not constitute an RMP Update. However, the municipality may propose to make use of other policies of the RMP to effect a policy change in LUCM Zone, including the Map Adjustment program, (See A above) or, as suggested by the municipality, the municipality may wish to consider proposing a Highlands Redevelopment Area designation for this property if the proposed redevelopment is not consistent with the current RMP LUCZ (See E above). The designation of a Highlands Redevelopment Area cannot be achieved through an RMP Update, but rather requires a site-specific application. In addition, this property may be eligible for a Highlands Exemption (See D above).