

**Hamilton Farm Golf Club WQMP Amendment
RMP Consistency Determination
Public Comments and Responses**

Public Comments Received

Public comments regarding the Highland Council staff Regional Master Plan Consistency Determination review of the proposed Hamilton Farm Golf Club amendment to the Upper Raritan WQMP were received from David Smith, PE, from Applied Water Management and Cindy Ehrenclou, Executive Director, from the Upper Raritan Watershed Association.

1. **COMMENT:** The Upper Raritan Watershed Association agrees with the Highlands Council's determination of inconsistency but states that the already approved water allocation permit should be an aspect of the WQMP amendment and is applicable to the review at hand. They ask that the Highlands Council apply the RMP's Policy 2B4, to strictly limit consumptive and depletive water uses and find this use inconsistent. URWA finds that Hamilton Farm Golf Club is using excessive amounts of clean water to irrigate a golf course.

RESPONSE: The Highlands Council is not in a position to conduct a consistency determination about the water allocation permit because NJDEP has already approved the permit. Therefore, this WQMP amendment does not address the previously approved water allocation permit, but focuses on the proposed wastewater reuse, disturbance of the additional development, and the increase in the amount of wastewater generated.

2. **COMMENT:** David Smith from Applied Water Management submitted a comment and GIS shape files delineating the limits of disturbances. Mr. Smith states that a vast majority of the proposed SSA was developed following original golf course construction. Only a small portion of the SSA (~2.5%) will be disturbed as a result of the golf course expansion. Since the proposed disturbance is significantly less than what was assumed in the staff report, some of the impacts to Natural Resources may no longer exist. Mr. Smith emphasizes that the project disturbs 1.25 acres or 0.3% of the total onsite prime ground water recharge area. In an effort to mitigate the disturbance of ground water recharge areas, Hamilton Farm proposes to install dry wells that will collect runoff from the roof of the clubhouse and the pool house. The total proposed roof area is 17,630 ft², which will yield approximately 0.4 MGY of recharge. Mr. Smith further states that Hamilton Farms Golf Club is committed to conserving onsite water use and implementing recycling systems. Hamilton Farm proposes to construct a reclaimed water for beneficial reuse for irrigating the golf course; installed and currently operates a water recycling system to service golf equipment wash down facility; and proposes to install low flow plumbing fixtures where feasible. Finally, Mr. Smith comments on the Smart Growth aspect of the Consistency Determination declaring that the improvement onsite are designed to minimize the site impacts of development. This is achieved by minimizing proposed grading, reducing the changes to existing soils profile, and preserving the existing landscape.

RESPONSE: Based on the additional information provided from the applicant, the Highlands Council staff amended its consistency determination for the Hamilton Farm WQMP. The WQMP amendment to which the consistency determination applies reflects what is stated in the New Jersey Register. Therefore, the submitted revision is addressed in the comments sections for general information but does not change the inconsistencies until incorporated by NJDEP into the WQMP amendment. The revised limits of disturbance will not encroach upon forest resources and steep slopes and would be considered consistent with the RMP if NJDEP adopts this proposed limit of disturbance. Commentary regarding the Prime Ground Water Recharge, Water Conservation, and Smart Growth aspects of the WQMP were updated with the information provided by the applicant.