

Crafting/Submitting Comments to NJDEP & Summary of Environmental Concerns

Craft your comments:

Submit your written comments to NJDEP no later than March 23 regarding the proposed 96-unit development in Harding (known as KRE Harding Residential or S/K Mt Kemble). The subject line of all submissions must include the following: **Program Interest No. 435442, Activity No. AMD200007**

- Include your name, address, and contact information including your email address
- Subject line for email or letter must include: **Program Interest No. 435442, Activity No. AMD200007**
- Opening of the letter should reference that "comments are pertaining to NJDEPs Proposed Amendment to the Northeast Water Quality Management Plan"
- Comments should focus on environmental issues related to the addition of 9.3 acres to the Sewer Service area map (served by Woodland Wastewater Treatment plant)
 - Ideally comments will focus on two to three of the points referenced by the experts in our informational webinar and summarized in the list below. [Watch GSWA's February 23 informational webinar replay HERE.](#)
 - **NJDEP will NOT give weight to comments that are COPIED (or CUT and PASTE.)** Please put comments in your own words. You may use our **Environmental Issues list** (*see below) as a starting point.
- View the [February 23 informational webinar PowerPoint presentation HERE](#)
- Comments **should** refer to the proposed change in the Northeast Water Quality Management Plan as needed due to the addition of the development property to the Sewer Service Area
- Comments **should NOT** refer to non-environmental issues such as noise, lights, traffic, or low-income housing
- Please conclude your comments by stating your preferred outcome to the proposed amendment

Submit your comments (via Email or US Mail):

Email to: wqmp.publiccomments@dep.nj.gov

- Email subject must say: **Program Interest No. 435442, Activity No. AMD200007**
- Must be sent by March 23, 2023
- Share your submission with GSWA (**see below)

US Mail:

- The top of the letter must note: Program Interest No. 435442, Activity No. AMD200007

- Must be postmarked by March 23, 2023
- Share your submission with GSWA (**see below)
- Address the envelope exactly as shown here:

New Jersey Department of Environmental Protection
 Division of Watershed Protection & Restoration
 Bureau of NJPDES Stormwater Permitting & Water Quality Management
 Planning Program
 PO Box 420, Mail Code 501-02A
 501 East State Street Trenton, New Jersey 08625-0420

***If you would like to share your submission with GSWA, please Email:
 SRubin@GreatSwamp.org or mail a copy of your letter to: GSWA, P.O. Box 300, New Vernon,
 NJ 07976, Attn: Sally Rubin*

***Environmental Issues as related to the proposed KRE Harding Residential Development**

- **Issues of concern related to the Highlands in reference to Executive Order 114 (see highlighted section numbers 9 and 10)**
 - Proposed Mt Kemble development would be located in a water deficit area as delineated in the Highlands Regional Master Plan
 - Water supplied to the proposed development will be withdrawn from a sub watershed (HUC14 – Great Brook above Green Village Rd) categorized as being in water availability deficit
 - Water utilized in the proposed development will be transferred out of the sub watershed (HUC14 – Great Brook above Green Village Rd) to a different sub watershed (HUC14 Loantaka Brook) further exacerbating the water availability deficit
- Issues concerning the amendment of the current **sewer service area map** to add the proposed development area
 - This 9.3 acre proposed development is not currently included in sewer service areas
 - The proposed development will extend the sewerage service area– not infill within a current coverage area
- Issues concerning the replacement of 9.3 acres of woodland area with rooftops, hardscape, pavement, and lawn
 - Overall runoff volume will be increased to downstream properties due to a lack of post-development recharge of stormwater runoff

- Flow path of post-development stormwater runoff will be altered from sheet flow over the majority of 9.3-acre site and be concentrated at two discharge points
- Although the development meets the reduced overall runoff volume will be increased impacting sensitive downstream habitats
- Stormwater runoff will contain increased nutrients and chemicals that will have a negative impact on downstream water quality
- Proposed development does not satisfactorily meet [New Jersey Administrative Code \(NJAC\) 7:8 \(policy excerpt on pages 4-6 of the PDF \[please ignore page numbers on the actual document\]\)](#) requiring 100% of a site's annual pre-development stormwater recharge volume be maintained after development **and** 100% of the difference between the site's pre and post-development 2 year runoff volumes be infiltrated on site
- Issues regarding the direct downstream impacts to critical habitat for threatened and endangered species (T&E)
 - Increases in water volume to the Silver Brook (AKA – Catfish Brook) will cause bank erosion threatening known, critical wood turtle habitat at the GSWA CMA
 - Altered base flow volume will impact Federally funded vernal pool restoration directly downstream
 - Increased nutrients contained in stormwater runoff from the proposed development will negatively impact downstream water quality resulting in the impairment of sensitive macroinvertebrate habitat
- Changes to the Northeast Water Quality Management plan as needed to expand the Sewer Service Area map will create significant additional effluent discharge volume, through the Woodland Wastewater Treatment Plant, into Loantaka Brook
 - Loantaka Brook HUC14 is classified by NJDEP as an impaired waterway. [NJDEP Water Quality Standards 7:9B \(policy excerpt on page 3 \[please ignore page numbers on the actual document\]\)](#) protects the integrity of NJ waters for public health and aquatic biota which would be impacted by the increase in water volume and nutrients from the additional sewerage discharge.
 - [Antidegradation policies 7:9B – 1.5d \(policy excerpt on page 3 \[please ignore page numbers on the actual document\]\)](#) state that there can be no measurable change or lowering of water quality in Loantaka Brook, and that the developer should perform an Antidegradation Analysis if there is a possibility of a change and justify a need for lowering the water quality.

- Additional nutrient loading caused by the increase in effluent from Woodland Wastewater Treatment Plant could exacerbate algal blooms in Kitchell Pond, which is part of Loantaka Brook HUC14. Impacts from algal blooms could include the presence of blue-green algae classified by NJDEP as a harmful algal bloom (HAB)