



WOOLWICH TOWNSHIP

120 Village Green Drive
Woolwich Township, New Jersey 08085
Main: 856.467.2666 Fax: 856.467.3545

Vernon R. Marino
Mayor

Jane DiBella
Administrator

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Donna Rendeiro, Director
NJ Office of Planning Advocacy
Dept. of Community Affairs
101 South Broad Street
P.O. Box 204
Trenton, NJ 08625-0204

Re: Supplement to Woolwich Township's Biannual Report

Dear Ms. Rendeiro,

I thought it would be helpful to submit the below supplemental information as the Biannual Report ("The Report") is lengthy and we'd like to call your attention to specific items requiring OPA's attention. First, I am providing additional requested information regarding specific sites, which the Township seeks to have included in the designated Centers and associated Sewer Service Areas (SSA), which will necessitate State Planning Area changes. Secondly, I have included various Plan Implementation Agreement (PIA) Actions, which we either no longer believe are appropriate and wish to have removed, or require the attention of OPA and/or other State agencies to realize success.

As part of current efforts to update and amend the Wastewater Management Plan (WMP), which is discussed in greater detail in the Report, the Township has been working with the County's consultant, Churchill Consulting Engineers, on adding about a dozen sites to various SSA's in close consultation with NJDEP. Much discussion and vetting of sites proposed for inclusion by the Township and County has already taken place. In fact, the Department indicated its support to include the sites listed herein, during a conference call held on October 3, 2019, which Scott Sullivan, Bruce Friedman and Rick Brown participated. In order to formally include these sites and secure the necessary State Planning Area changes, OPA has advised the Township that it must obtain an amendment to its Endorsed Plan and PIA, which may be accomplished through submission of the Report. Having submitted the Report, the Township

offers the following supplemental information and requested site-specific justification for your consideration and support.

Site-specific amendments:

The Township understands that those portions of sites identified by NJDEP as Environmentally Sensitive Areas (ESA) will not be included and has had same discussions with the Department.

High Hill Park

Block 5, Lot 4 and 7 are located in PA-Parks & Natural Areas and zoned R-3 (Residential). The parcels are situated adjacent to PA-2 and comprise municipal-owned open and parkland located along the north side of High Hill Road. The Township seeks to add both parcels to the adjacent PA-2 SSA (Weatherby PUD), which is served by the Logan Township Municipal Utilities Authority (LTMUA). There are several ballfields and a parking area on Lot 7, which experiences high levels of public usage during games and tournaments. Additional fields will likely be added to the east side of the parcel later next year. Future plans call for a restroom facility at this site, which would necessitate the need for public sewers and inclusion into the adjacent PA-2 SSA. Lot 4 is divided between active farming in cultivated fields fronting High Hill Road, and passive recreational uses to rear. Future plans call for establishing athletic fields on portion of parcel fronting the road. As heavy tournament use will necessitate need for a public bathroom facility, the Township likewise seeks to add the site to the adjacent PA-2 SSA. NJDEP has indicated support for adding the entirety of Lot 7 to the adjacent SSA, but only the frontage of Lot 4, south of the unnamed tributary, which bisects the property.

Locke Ave Park

Block 5, Lot 10 is located in PA-Parks & Natural Areas and zone R-3 Residential. It is situated adjacent to PA-2. The site is part of Locke Ave Park and fully developed in support of a wide variety of athletic and park-related activities. It is the most intensively used site within the park-system. It is adjacent to the Borough of Swedesboro and proposed for inclusion in the Swedesboro Public Works SSA. There is a Light Industrial Zone adjacent to park that is also served by the Swedesboro SSA, which extends into both Woolwich and Swedesboro. There is already an existing public bathroom on the property, which conveys sewer flows to the Swedesboro SSA. As such, the request to add Lot 10 would correct a mapping oversight.

PMC Redevelopment Area Plan

Block 5, Lots 11.01 and 16 are located in PA-Parks & Natural Areas and PA-5. Both parcels are adjacent to PA-2 (downtown Swedesboro) and are subject to an approved Redevelopment Area Designation and Plan that is enclosed herein. Final design and permitting are underway to construct a second and larger public bathroom and concession stand with kitchen on Lot 11.01 (10+acres) to support Locke Ave Park. Construction is anticipated to commence during third quarter of 2020. It is the Township's position that Lot 11.01 should not have been placed in PA-Parks & Natural Areas as the site was not acquired with dedicated open space funds and is therefore not included in the ROSI as confirmed by the Green Acres program. The parcel was acquired by the Township as a possible location for a future YMCA or similar use as part of potential future public and private partnership. Lot 16 is a Brownfield site harboring

approximately three-dozen abandoned vehicles and semi-trailers with potential environmental issues. The site is adjacent to both Raccoon Creek and a dense residential area within Swedesboro. Redevelopment of both sites will benefit the park and adjacent residential areas.

Beckett Country Club Golf Course

The below parcels are associated with the former Beckett Country Club Golf Course, which permanently ceased operations in 2019. The property is largely located within PA-4 (Block 31.01, Lot 12 is PA-3). The entire property is zoned R-1 Residential. The NJ Turnpike and a narrow strip of less than a dozen residences within PA-3, separates the property from adjacency with PA-2. For the past several years, the property owner has actively marketed the property, but efforts to find a buyer interested in reopening the golf course have been unsuccessful. Three parcels comprising much of the former golf course and fairways were partially preserved under the Township's Transfer of Development Rights (TDR) program in 2016. The preserved parcels are subject to a unique deed of easement, which permits certain forms of limited development, including the construction of one structure of up to 5,000 sq. ft., per lot for residential or certain commercial uses. Wineries, breweries, youth camps, botanic gardens, golfing, and a variety of other active and passive recreational and social uses are also permitted. A map depicting restricted and unpreserved parcels is attached

In 2018, the Township and seller worked diligently towards acquiring the tract as municipal open space after the NJ Green Acres program and various area non-profit land trust groups indicated that they were not interested in the property. Unfortunately, the Township was unsuccessful in efforts to obtain meaningful participation from Green Acres. With over 300 acres of open space in municipal ownership already, the Township is reluctant to acquire and assume management of another 225+ acres of additional land without adequate assistance from Green Acres or other entities. As a result, the project stalled, and the Township is now focusing its limited dedicated funding on park development and farmland preservation.

The impetus to include the site in PA-2 SSA is to address blight, as the course and associated structures are currently abandoned with potential environmental issues. Its abandonment is a serious concern for the Township's residents, as the property is surrounded by residential subdivisions. NJDEP has already indicated its support to add the property to SSA, although the Township is still awaiting parcel-specific confirmation. Once included in SSA, the Township will explore having the property declared in need of redevelopment and having an associated redevelopment plan adopted to attract a redeveloper as part of a public and private partnership. In the scenario where such desired uses as athletic tournaments, weddings and other social event facilities, and alcohol production occur, the availability of public sewer is a must. Therefore, the Township seeks to add the following parcels to the PA-2 SSA (Weatherby PUD):

Block 31, Lot 4 = 62 acres (deed restricted with limited development potential)

Block 31, Lot 4.01 = 2.75 acres (clubhouse with restaurant and bar)

Block 31, Lots 4.02 and 4.03 = 2 and 1.5 acres (existing single family dwellings to be demolished)
Block 31, Lot 3.01 = 50 acres (former golf course unpreserved)
Block 31.01, Lot 12 = 15 acres (former golf course unpreserved)
Block 40, Lots 9 = 10 acres (former driving range unpreserved)
Block 40, Lots 12 and 14 = 25 and 57 acres (deed restricted with limited development potential)

Rt. 322 Regional Smart Growth Center (aka Kings Landing)

Block 14, Lot 5.01 and Block 12, Lot 5 are located within PA-4. The Township is seeking to add these sites to the Regional Smart Growth Center and associated SSA. NJDEP has already indicated its support to add these sites to SSA as part of the WMP update process.

Block 14, Lot 5.01 is 18.7 acres in size and currently zoned R-2 Residential. It is currently included in the TDR Sending Area (15.75 credits), but proposed for removal and placement in the TDR Receiving Area. It is also partially included within the existing Regional Center and associated SSA boundary. As outlined in the Biannual Report, the property was recently designated “In need of redevelopment” and is subject to amendments proposed to the Kings Landing Redevelopment Plan (Regional Center) that will formally place it within the adjacent TDR Receiving Area. The property nearly surrounds the municipal-owned, former NIKE Missile Launch Site (Block 14, Lot 4) that is subject to a site-specific Redevelopment Plan. The Township believes that the adjacent Receiving Area property (Block 14, Lot 3) located along the east side of Paulsboro-Swedeseboro Road (653), represents an ideal location for TDR-centered development given the nature and amenities of the surrounding area. As such, the Township is seeking to expand the existing TDR Receiving Area by adding Lot 5.01, which will have the added benefit of connecting the future residential Receiving Area to the NIKE Missile site, which is subject to a deed restriction that purposes the 34-acre Brownfield property for public open space and passive recreational uses. It is hoped that in connecting the NIKE Missile site to the Receiving Area, that the Township will be in a better position to foster a future public and private partnership necessary to redeveloping the property for compatible public recreational uses as called for in the Public Spaces and Kings Landing Redevelopment Plans that will become a community-wide asset. The loss of 15.75 TDR credits will be accounted for during the update of the REMA and proposed amendments to the TDR ordinance which is expected to commence early next year.

Block 12, Lot 5 is a 58-acre property located in the I-C Cemetery Zone and abuts a large existing cemetery (Block 12, Lot 9) along its southeastern boundary. The St. Clare Parish of Assisi (“The Parish”) wishes to eventually construct a large Church and associated uses, including classrooms on the property, which is not feasible without sewer service. The Church would serve the large adjacent TDR Receiving Area and associated PA-2 SSA, located immediately to the east. The Parish had previously sought to develop a nearby agricultural property for this use. However, the property (Block 13, Lot 5.01 – 19 acres) was targeted for preservation under the Township’s Farmland Preservation Plan. As part

of a complex negotiated deal, the parties worked together to preserve Lot 5.01, which closed on December 12. In return, the Township obtained NJDEP's support to add Block 12, Lot 5 to the WMP and associated SSA. As the site is bisected by the Grand Sprute Run NHPS, the Township worked closely with the Department in obtaining its formal written support to add those portions of the property to SSA that are outside of the NHPS boundaries and underlying forest habitat. The NJDEP also conditioned its support on future preservation and/or protection of the forested portion of site within the NHPS.

Plan Implementation Agreement Actions: Township responses in red.

Action # A6 = "Township shall collaborate with adjacent municipalities, as to participate in regional land use activities with Logan and Harrison Townships and with other adjacent communities. State, particularly NJDOT and NJOSG, and DVRPC shall take leadership roles, building on prior regional planning activities along US Rte. 322. The timeframe is ongoing and contingent upon ongoing studies conducted by NJDOT and DVRPC." **Completed.** Woolwich has satisfied this item and will continue to do so through the process of cross-acceptance.

Unfortunately, neither OPA or NJDOT have assumed a leadership role with respect to regional planning activities along US Rt. 322 corridor. While the Township is grateful that NJDOT has, after many years of broken promises, finally commenced reconstruction of the intersection with Kings Highway, there remains no plan or State funding in place to holistically improve the corridor. Currently, it appears that it is NJDOT's policy to have developers pay for, and install all future improvements, which will result in numerous bottlenecks as only certain areas along of the corridor will be developed. As such, it is likely that certain segments of the corridor will be expanded to a five-lane cross section, while others will remain as current two lane configuration. With all the growth and development taking place in the region and along this economically vital corridor, the Township and County require greater leadership and assistance from the State and NJDOT to address worsening conditions and LOS along the Rt. 322 Corridor.

Action # G4 = "The Township and NJDOT shall reexamine State Highway Access Levels and cross-sections. NJDOT and Township shall concur on the necessity of any Access Level change requests within 1 year from the date of Initial Plan Endorsement to the extent feasible or as soon as possible thereafter in conjunction with the US Route 322 Corridor Management Study." The NJDOT study was never completed. From 2013 through 2014, the Township initiated repeated efforts to engage the NJDOT on this issue and to obtain their support in developing an Access Management Plan, which was not supported. In addition, the NJDOT would not support the boulevard concept as outlined in the 2008 and 2016 Circulation Plan.

Action # G5 = "The Township shall implement transportation infrastructure financing method identified in CIP and infrastructure improvement phasing. A Transportation Development District (TDD) shall be developed for the Regional Center that will likely involve local, county, and state roads as well as NJ Turnpike access. The development of the Regional center in conjunction with regional transportation needs shall necessitate cost-share solutions to be

shared by various government entities and developers. NJDOT shall work with the Township to develop an action plan for providing infrastructure and improved connections to support new development in a logical sequence as it emerges. This shall be in cooperation with the US Route 322 Regional Corridor Management Study, including adjacent Townships. Gloucester County shall participate in the cost-share as well. NJ Transit shall also coordinate with the Township to identify cost-recovery and actual subsidy required for various types of transit services and enhancements, along with possible trigger points for service based upon development and revenue. Action Plan to be started within 1 year from the date of Initial Plan Endorsement and to emerge in conjunction with the US Route 322 Corridor Management Study, which shall include funding partnerships among NJDOT, all affected municipalities, other interested public and private entities, that begins to implement infrastructure phasing within 10 years. To the extent that the timing of the US Route 322 Corridor Management Study proves detrimental to implementing TDR in Woolwich Township, the Township reserves the right to have the Action Plan completed within adequate time to prevent said detrimental impact.” Woolwich has partially satisfied this item in conjunction w/ the NJDOT but is unsure of the present status of the Rte 322 Corridor Management Study. Additionally, the Township has asked the County to take a leadership role in addressing this item. In the absence of the promised NJDOT study and fact that the above-mentioned support from various governmental entities, including development of a joint action plan and funding partnership agreements that also never materialized, the overly ambitious CIP and TDD cannot be developed. As such, the Township requests that Action#G5 be removed from the PIA. In its place, the Township will consider PILOT agreements and similar tools as it deems necessary and appropriate to assist in the cost-share for off-site transportation improvements on a case-by-case basis.

Action # G6 = “The Township shall work with NJDOT to obtain approval for any necessary wetlands crossings, which is the Developers responsibility. The timeframe for completing this item is subject to the timeline set forth in above-referenced Action Plan established in PIA Item G5.” Woolwich will endeavor to satisfy this item within the required time frame in conjunction with the Action Plan, once obtained. **Project specific.** As this item is a developer responsibility, and because wetlands within the corridor do not appear to represent a substantial impediment to desired development, the Township requests that Action#G6 be removed from the PIA.

Action # G8 = “Investigate opportunities for enhanced bus service both regionally to adjacent areas and to the Regional Center with NJ Transit to take the lead within 1 year from the date of Initial Plan Endorsement.” Woolwich expects to satisfy this item once discussions occur with NJ Transit. **Project specific and not completed.** The Township will work with developers to explore opportunities to locate public transit facilities as projects move forward at key locations where large format retail, mixed use and/or high density residential development are proposed. It would be helpful if NJDOT or NJ Transit to lead and initiative as outlined in this action.

Action # G9 = “The Township shall obtain approval for NJ Turnpike (Exit 2) access improvements. NJDOT and NJ Turnpike Authority to determine this within 1 year from date of Initial Plan Endorsement.” Woolwich expects to satisfy this item once discussions occur with NJ Turnpike and NJDOT. **Ongoing.** In 2012, safety improvements were made at Exit 2 in Woolwich Township. The Authority installed a traffic signal at the entrance to the Turnpike with US 322. In addition, the intersection was widened with turn lanes on all approaches and a commuter parking was installed. NJDOT’s conceptual approval for Phases 1 & 2 of the Wolfson Group commercial projects entail substantial improvements to be undertaken by the developer. The Township has long maintained that the Authority should undertake further improvements sought by NJDOT to the TPK Interchange at its expense. As both NJDOT and the Authority were well aware of the Wolfson Group’s approved GDP covering 1.4 million sq. ft. of commercial space proximate to the interchange at time of previous improvements, it should have adequately addressed anticipated need to accommodate at the time, as the developer is responsible for on-site improvements. The Township believes that greater coordination and leadership by NJDOT and the County is necessary to providing holistic approach to addressing corridor-wide deficiencies to LOS.

Please note that under all “G” items, “when requested, NJDOT will give priority consideration to providing technical assistance consistent with program requirements and subject to the availability of state resources.” It does not appear there are any hooks to encourage various State agencies to support the PIA or Township’s efforts to realize center-based smart growth within the Rt. 322 corridor and associated growth center, which is a critical failing of Plan Endorsement. Thus far, for its efforts in obtaining and maintaining endorsement, the Township has taken on substantially costly and time-consuming burdens, with little or no benefits and support from the State agencies, with the exception of assistance from the State TDR Bank Board.

Action # 11 = “Township shall implement stormwater infrastructure financing method identified in Capital Improvement Program (CIP) within 1 year from date of the Initial Plan Endorsement.” **Not completed.** As discussed with OPA during the 2016 submission, on-site improvements are the responsibility of the developer as with any site plan or project. As such, the Township requests that Action#11 be removed as it is cost prohibitive to the Township.

Action # 12 = “The Township shall complete Township-wide CIP to address anticipated needs outside of the TDR Receiving Zones and Regional Center. Township Planning Board to recommend and Township Committee to adopt within 5 years of Initial Plan Endorsement.” **Not completed.** As discussed with OPA during the 2016 submission, the Township will consider use of PILOT agreements and similar tools on a case-by-case basis as means to assist developers with certain off-site traffic improvements that provide a clear and necessary public benefit. The Township is currently not pursuing CIP as other tools such as PILOTs have proven easier, less litigious and costly to administer. As such, the Township requests that Action#12 be removed.

