



# Township of Howell

(732) 938-4500 x2102

**Environmental Commission**  
[environmental@twp.howell.nj.us](mailto:environmental@twp.howell.nj.us)

January 21, 2021

Wendell Nanson  
Chairman  
Zoning Board of Adjustment  
Township of Howell  
4567 Route 9 North  
Howell, NJ 07731 Farm A

Re: BA20-107; 366 Ramtown Greenville Road, LLC, , Use Variance  
366 Ramtown Greenville Road

Chairman Nanson:

Please accept this letter on behalf of the Howell Township Environmental Commission (“Commission”) regarding our review of this application, and our meeting with the Applicant at our January meeting. Mr. Pape, the applicants attorney and Dr. Raymond Walker, of Colliers International discussed the environmental issues and constraints at the site, which is before the board seeking approval for expansion of a non-conforming use.

While the Environmental Commission generally takes a stand against approving non-conforming uses or expanding non-conforming uses, we believe this application also involves environmental issues that deserve strong consideration and if credited would dictate that this application be denied.

First, the proposed project is contained within an area that is identified as environmentally sensitive property. It is located along the Muddy Ford Brook, which requires a 300 foot buffer. The property is in an area that contains endangered plant species – swamp pink, and is an acknowledged habitat for an endangered species – the black crowned night heron. As such, we are not in favor of any removal of the habitat that can be avoided, and in this case, it can be because the applicant seeks expansion of a non-conforming use. The removal of habitat for an endangered species is a substantial detriment especially when there is not replacement habitat generally available...Accordingly, we strongly urge that environmental considerations be heavily weighted in evaluating the applicants’ use variance request.

Further, the application involves incursion into the wetlands and the construction of a large retention basin adjacent to a road and stream that was recently repaired due to heavy flood damage. Altering the property so significantly is likely to create further hydrologic issues. Stream water quality issues are also likely to be adversely impacted by having a large bioretention basin immediately adjacent to the river.

The engineer on the application was not at the meeting. We further did not have the project plans and reports available at our meeting, and the on line link did not allow access after the meeting beyond the recently submitted stormwater management report. We did review the documents available in June 2020 and issued comments then, which we do not believe have been addressed other than generally – in that the applicant references moving a driveway away

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from the stream, and abandoning the use of septic and well as being improvements that are beneficial to the environment. We would ask that you review our comments from June 2020 in considering this applications, as the reasoning and concerns remain.

We understand that the applicant, despite not having approvals in hand for its proposed expansion, has already begun the process of moving the driveway entrance and is bringing water and sewer service to the site. Ramtown Greenville Road pavement was recently dug up for that purpose and has not been returned to its original pavement condition as of yet. We are hopeful that all required permits were obtained for these pre-approval activities.

Although the proposed use, involving an expansion of the existing use, is indicated as not being likely to increase truck traffic in and out of the site on the narrow two lane road in front of it, we have concerns that this representation may be inaccurate and overly optimistic. Given that currently 2-5 trucks are anticipated, we find that a tripling of the space for the business is likely to involve more trucks every day. This will bring both noise and air pollution to the nearby residential neighbors. This will also be a concern for school traffic, as Ramtown Greenville Road contains the entrances for three Howell Township schools and is traversed by many buses daily. The addition of left turning truck traffic without significant road widening is questionable. We don't believe that the road should be widened however, as the rural nature of the adjacent properties would be adversely affected if more traffic is invited along this generally quiet roadway.

For all the reasons set forth above, The Environmental Commission recommends that the proposed variance be denied.

Very truly yours,

/s/ *Christopher Garrick*

Christopher Garrick  
Howell Township Environmental Commission  
Chairperson

Enc.

Cc: Kenneth Pape, Esq., via email

Dr. Raymond Walker., via email

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