



LEAGUE OF WOMEN VOTERS®
OF NEW JERSEY

January 18, 2017

Caroline Armstrong
N.J. Department of Environmental Protection
Green Acres Program
Mail Code 501-01
P.O. Box 420
Trenton, NJ 08625-0420

Dear Ms. Armstrong,

The League of Women Voters of New Jersey is a nonpartisan, political organization whose guiding principle is active and informed participation in government. We are writing to oppose the application by the Town of North Bergen to divert over an acre of land in the historic Braddock Park, Hudson County, a Green Acres property, in order to build a permanent school structure. At present, and for the past 15 years, temporary classroom trailers have been located there, with the promise they would be moved. Locked gates and a driveway are on the site.

The 176 acre Braddock Park is an oasis in crowded Hudson County. There are over 45 various athletic facilities for the enjoyment of residents and visitors to the park. It has walking trails, a 16 acre lake, and abundant flora and fauna. It exemplifies the purpose of Green Acres Funding: active and passive recreation, open to all.

The League of Women Voters of New Jersey is a strong supporter of the Green Acres Program. Over one-half of New Jersey residents have repeatedly voted in favor of Green Acres funding, not only in the State, but in their counties. Many academic studies prove the value of open space for health and welfare.

It is easy to see the temptation to locate a public school in parkland, but this is no reason to grant the diversion. The temporary trailers with their gates and locks prevent public use of the park. The purpose of Green Acres is for all to enjoy, no locks, no private roads, no special hours, all which are part of a secure school setting.

We are pleased to note in your legislation the many safeguards in order to prevent diversions that compromise the purpose of Green Acres, and provide a reason to refuse the application for diversion.

As your rules state, 7:36-26.1(a), the use of parkland for other than recreation and conservation should be as a last resort and should only be considered if there is a compelling need. Further, 7:36-26 1(d)2 states that diversion should be granted only if there is no feasible alternative. Both of these rules should be the reason for refusing the diversion.

First, there is no compelling need, as the temporary classrooms have been there for 15 years and secondly, there is at least one feasible alternative that has been pointed out to the DEP on many occasions, a Board of Education property on 64th Street, a site with almost 5 acres. In addition, a school is leaving the area, which will allow the students currently situated in the temporary trailers to move to that site.

Your rule 7:36-26.1(d)6 states that the proposed replacement land shall be of “reasonably equivalent or superior quality to the parkland proposed for diversion”. It further states that “parks that provide services to significant populations are replaced with recreation areas that serve the same, if not broader population.” The proposed three sites for replacement do not in any way equal the value of what you are taking away from the park. The replacement fragments areas will not serve the same, if not broader, population. We note the many letters of opposition from residents pointing out the poor value of the three replacements: a cement viaduct in Hoboken that might be used as a pedestrian mall; a potentially commercial area adjacent to a proposed housing development; and an approximately ½ acre steep slope 780’x40’ patch which is cut off from the rest of the North Braddock Park and runs parallel to River Road. None of these equal the value of the site proposed as diversion.

The League of Women Voters supports Green Acres because of its policy of keeping the park as a public good for all. This diversion would set a dangerous precedent. It may seem that removing only an acre of land from such a large park will not make a difference. But it does. It is “spot diversion”, akin to spot zoning, and will in all likelihood lead to other applications based on your decision.

The League of Women Voters of New Jersey urges you to deny the application for diversion and recommend another location for the school.

Sincerely,

A handwritten signature in black ink that reads "Nancy K. Hedinger". The signature is written in a cursive, flowing style.

Nancy Hedinger, President