

October 24, 2022

Andover Land Use Board
Township of Andover
134 Newton-Sparta Road
Newton, NJ 07860

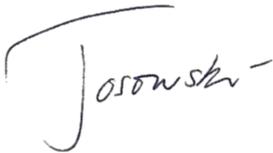
Re: Andover Township Environmental Commission's Report for BHT Ecological Report located at 248 Stickles Pond Road, Block 151 Lot 22

Dear Members of the Board,

The Andover Township Environmental Commission (ATEC) has reviewed the 9-8-22 Ecological Report for the BHT Properties Group Property located at 248 Stickles Pond Road, Block 151 Lot 22. Regarding this proposal the ATEC has the following comments and concerns:

1. We have concern over the methodology they created to determine how species of interest would be impacted by this project. Is their methodology based on any scientific research? Without empirical support their methodology does not hold any scientific rigor and therefore holds no meaningful analysis to base decisions on.
2. We also have concern that there was not adequate site visits, or at the proper times to determine if species of interest are on the property. As one example, they did not visit at night which would be the best time to determine if owls are on the property. The fact that they did not find the species of interest due to their limited number of visits, does not mean the species do not live in this area.
3. We did not see any mention of how the impacts of the operation on the environment. There are scientific models that can be used to measure this. We know this information has been requested but still has not been provided. Specifically we are wondering how the operations will impact the hydrological aspects, air quality, noise impacts and quality of life concerns for the local residents.
4. When discussing the vernal ponds, they have not taken into consideration the connectivity to other habitats that is needed for a vernal pond to work. For example, vernal ponds are used for mating and early life cycles of the animals that use it. If the animals cannot get from the local waterways to the vernal pond due to the impact of the use of this project, then essentially you have a non-working vernal pond. They need to take this into consideration.

Sincerely,

A handwritten signature in black ink that reads "Osowski". The signature is written in a cursive style with a large, sweeping initial "O" that extends above the line of the text.

Joshua L. Osowski, Chair
Andover Township
Environmental Commission