

The Commissioners and members of the Glen Rock Environmental Commission (GREC) would like to address the environmental concerns that have been raised due to the pending construction of the Environmental Education Center (EEC) at the Thielke Arboretum. We believe that the proposed site, set back from Doremus Avenue, is an ideal location and probably the best location within the Arboretum borders. We feel strongly that the world needs more environmental education, and we are glad that our town has the ability to provide environmental and educational leadership that benefits the public good. The EEC will be a great asset for the Borough and provide a better understanding of local ecology and natural processes for generations to come.

First, we have found that the proposed site is outside the wetlands delineation, as evidenced by our review and reading of the NJDEP Letter of Interpretation, dated 5/12/09, and which was extended 6/30/16 under New Jersey's Permit Extension Act (PEA). The letter reads, "Based upon the information submitted, and upon a site inspection conducted January 12, 2009, the Division has determined that freshwater wetlands, waters, and transition areas are not present within the proposed limit of disturbance". Secondly, we find that the proposed site is clearly outside the borders of the FEMA 100 and 500 year floodplain maps, which can be found by clicking this link: <http://www.glenrockarboretum.org/Pages/FEMAMaps.aspx>. Further, Borough Engineer Gary Ascolese, has clearly stated that there is no issue with the location and flooding, and whose firm, Boswell Engineering, has provided a Floodway Map, which is available through FOGRA upon request to [tviebig@bylnj.com](mailto:tviebig@bylnj.com)

We also do not find that the one story, 2,552 square foot building proposal (including the patio and entranceway), is in violation of the "open-space" nature of the Arboretum. The vast bulk of more than 99% of the Arboretum, will be untouched by the building's footprint. One acre equals 43,560 sq feet, and the Arboretum is 11 acres or 479,650 sq feet; therefore the building will occupy approximately 0.53% (2,552sq. ft./479,650 sq. ft.) of the Arboretum tract, substantially less than 1.0%.

FOGRA volunteers have already transplanted the smaller shrubs and plant specimens that will be impacted by the building's construction. They are optimistic that no large or specimen trees will have to be removed. The one large tree that was removed a few years ago had been cabled to support a large split that posed a danger. It was finally taken down at the recommendation of the tree service employed at that time. GREC is confident that FOGRA will continue to be good stewards of the land, and plant additional trees, shrubs and flowers as part of their ongoing mission. Further, FOGRA's collaboration with the Shade Tree Advisory Committee gave away hundreds of saplings to Glen Rock residents for planting this past Arbor Day.

We also believe that the EEC will greatly enhance the use and understanding of the Arboretum, much like the visitor centers and facilities that the national and state parks employ. Visitors will learn of the local ecology, water cycles and quality, sustainable design and use, wildlife & conservation, tree identification, wildlife art, photography and more. In fact, the LEEDS

compliant design for the EEC will be a working model of energy efficiency, recycled materials, and sustainability, including rainwater harvesting.

Additionally, the GREC has researched whether or not FOGRA has the correct approvals in place to begin construction. At the federal level, the National Environmental Policy Act (NEPA) review process, which can mandate Environmental Impact Statements and Assessments (EIA and/or EIS) “begins when a federal agency develops a proposal to take a major federal action.” (<https://www.epa.gov/nepa/national-environmental-policy-act-review-process>). Since the federal government is not proposing the construction of the EEC, federal approval is not required.

In conversations with personnel of the NJDEP Green Acres program, which encumbers the Arboretums as “unfunded parkland” FOGRA is adhering to their recommended “Change in Use” process and guidelines. The current lease negotiation with the town is part of the “change in use” process, as is the allowance for public comment (more than 7 years have been allowed for comment including multiple work sessions and monthly public meetings). The large sign at the park entrance, advertising the creation of the EEC is also part of, and in compliance with, the NJDEP recommended processes. Finally, we feel that the Council’s approval in a December 2009 work session provides the necessary authority at the borough level to construct the EEC. Local approval will be reauthorized and reconfirmed with the finalization of the lease between FOGRA and the Borough, which will detail the terms and conditions of the future management of the building.

The vast majority of field trips and class visits will occur in the fall and spring (when the pool is closed) using school buses that park in the pool lot. We do not expect school field trips in buses to generate the hordes of parked cars and traffic that are usually common along Doremus Avenue during the summer pool season. Further, we feel that any negative impact created by additional vehicular traffic, is more than offset by the learning and environmental values that are instilled upon the children who visit.

Given that the hardworking volunteers of the Arboretum originally installed the network of trails in place, we believe that if additional pedestrian traffic were to cause detriment or adversely impact the surrounding paths and landscape, that FOGRA’s board and volunteers would quickly put in place management practices to minimize the impact, such as re-routing or temporarily closing paths, installing erosion bars and additional mulch to maintain the trail network in good condition. They could even pursue a “pack in, pack-out” philosophy to minimize garbage collection and maintenance.

Mother Nature cannot be fenced -in, and should not be for the exclusive use of a privileged few. The world clearly needs more environmental education, and the EEC is a great vehicle, especially for children, to learn the marvels of the natural world. Children would develop a greater environmental consciousness and “eco-friendly” habits as a result of their visits. The

EEC would only build upon the legacy established by the purchase of the land in 1954, the creation of the Arboretum, and the dedication over the decades of the small army of volunteers who have made it the beautiful resource that it is today. The GREC is proud that FOGRA and the town have the foresight and are in a position to provide this facility for some much -needed environmental education.

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