



H2M Associates, Inc.

119 Cherry Hill Road, Ste 110  
Parsippany, NJ 07054 | tel 862.207.5900

**PARS2001: Replacement of Well 20, Block 736, Lots 9.01 & 9.02, Minor Diversion, Parsippany, NJ**

July 7, 2021

Morris County Open Space Commission

Attachments

Attachment A: Responses to Morris County Open Space Commission Questions

Attachment B: Project Summary

Attachment C: NJDEP Green Acres preliminary approval of Minor Diversion

## ATTACHMENT A

*Responses to Questions*



**PARS2001: Replacement of Well 20, Block 736, Lots 9.01 & 9.02, Minor Diversion, Parsippany, NJ**

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*Responses to Questions*

1. If the replacement well 20 fails and another suitable well cannot be located on the existing diverted property, could it revert back to open space?

*If Well 20R were to fail and a replacement for this well were unable to be located on this diverted parcel, the Township would certainly consider reverting this parcel to open space, especially if the parcel and proposed treatment building no longer served a functional purpose for the utility. The proposed construction at the site does not plan for any tree removal and will have a gravel driveway to maintain more of the natural look at the site. The requested diversion area also avoids the isolated wetlands identified at the site. Since the proposed construction is planned to minimize impacts to the site, reversal to open space would allow the site to return to conditions very similar to the current existing status.*

2. Could the current land of abandoned well 20, or other suitable open space, be utilized as replacement land in lieu of financial compensation?

*Yes, the Township is open to offering the current Well 20 site as a replacement in lieu of compensation. This parcel is owned by the Township and is designated as Block 736, Lot 7.07 on the official tax map. The parcel has an approximate area of 0.308 acres, which is almost twice the size of the area proposed for diversion.*

*It is worth noting, however, that the current well site could only be utilized as replacement land after the construction of the replacement well is complete and the well is fully operational.*

3. Should compensation be based on market value, not the grant amount? How specifically was the figure arrived at?

*While the Morris County Open Space, Farmland, Floodplain Projection and Historic Preservation Trust Fund Rules do not provide any specific method of calculating the amount of compensation for a minor diversion such as this application, the Rules suggest that the Morris County Preservation Trust Fund shall be reimbursed for its share of the purchase cost of the land. See page 3-13.*

*Consistent with the Rules, the proposed compensation amount is intended to reimburse the County in full for its share of the purchase cost for the proposed diversion area. The amount of compensation is based on a ratio of the proposed diversion to the overall lot size (3.3198%) against the funding amount of \$350,000 provided by the County at the time of acquisition in 2005 ( $\$350,000 \times 3.3198\% = \$11,619$ ).*

*Considering the de minimis nature of the diversion, and in an effort to avoid costs to the Township ratepayers, the Township has not prepared an appraisal of the property.*

4. The proposed well house looks like a residential structure:
  - a. Why was this design chosen?

*Typical well and treatment buildings tend to look more industrial and stand out as utility structures. The reason that the currently proposed design for the well and treatment building resembles a residential structure is that this aesthetic choice would be the most inconspicuous option for a structure that was located amongst other residential buildings and was located close to a road. The Parsippany Soccer Club building is on the adjacent*

*lot (also a Green Acres parcel) and the look of this building (colonial with shutters) was used as the primary inspiration for the treatment building design.*



*Photo 1. Parsippany Soccer Club*



*Photo 2. Lot 9.01 (to left) and Lot 9.02 (to right, with Parsippany Soccer Club)*

Here are some examples of PTHWD's existing well enclosures:



Photo 3. Well 4 & 4A Enclosure



Photo 4. Well 4 & 4A Enclosure

*The example well enclosure above includes an air stripping tower, a technology which will be necessary to address the water quality concerns at the replacement Well 20 site. It should be noted that the proposed treatment building has been designed to house the air stripping tower within the building.*

*It should be noted that the conceptual graphical representations that were shared as part of the hearing presentation were prepared to provide context and perspective. The conceptual building presentation is not the final design; design work has not yet started and will not begin until the Township has received minor diversion approval from both the County and NJDEP.*

*The Township has also internally discussed the option of doing additional landscaping at the site to further camouflage the building from the view of the road. Although a fence around the entire diversion was proposed, this is not mandatory. The fenced area can be limited to immediately surrounding the building and driveway with just enough room for necessary access for well and treatment maintenance. The Township is open to discussing the aesthetics of the site with the Committee.*

- b. Why is it so large (40 ft. by 40 ft.) and could it be smaller and less obtrusive?

*The estimated size of the building is dictated by the expected treatment needs for the well at this site as per the NJDEP regulations for drinking water. Based on the water quality data from existing Well 20 and from the replacement well, the treatment system here will require larger-sized equipment which will need to be housed in a two-story building with a sufficient footprint.*

*The diversion area of 0.164 acres is meant to encompass the majority of a 50-foot radius around the well (as mandated by the NJDEP). The permanently disturbed area will include the building, sidewalk, and gravel driveway and is estimated to be only 0.062 acres.*

5. The siting of replacement infrastructure on Preserved Open Space is of concern to the Committee. Does Parsippany have master plans for their water and sewer utilities? Do the master plans contain information on infrastructure replacement? If yes, are other Open Space parcels identified as potential locations?

*The Township Master Plan dated January 6, 2020, recognizes the need to ensure a safe and adequate supply of drinking water as well as the need for open space preservation. Goal 10 of the Master Plan seeks to assure that Township utilities, including water, are adequately maintained and have sufficient capacity to provide for current and projected populations. In particular, the goal is to protect and conserve the water supply serving the Parsippany-Troy Hills community. The Master Plan places equal emphasis on preservation and enhancement of open space in the Township. Indeed, Goal 6 of the Master Plan notes that the Township should continue to work collaboratively with the County to “improve County facilities within the Township and facilitate better connections to regional open space resources.”*

*Recognizing these two competing public purposes, the Township was faced with the difficult decision to locate the proposed replacement for Well 20 on preserved green space. Rest assured; the Township did not come to this decision lightly.*

*As discussed in our presentation on May 13, 2021, well siting can be a complicated endeavor. In the case of the replacement for Well 20, the Township needed to locate a parcel which was near Well 20; had sufficient aquifer thickness and materials for development of a well with a similar capacity; adequate room for the well and treatment building; had adequate separation from streams, wetlands, floodplains, property lines, sewer and stormwater lines, and known sources of groundwater contamination. Most replacement wells are located within 100 feet of the original well in order to meet the NJDEP definition of replacement. It is not possible to easily predict the lifespan*

*of a well, the quality of the source groundwater; and changes to regulated compounds under the Safe Drinking Water Act so it would be impractical – both from an economical perspective as well as an engineering stance – to plan ahead for the replacement of every asset. The Township purposely explored many options for locating the replacement for Well 20 to avoid use of this Green Acres / Open Space parcel and is not purposely seeking to reduce the amount of open space available to the community. The circumstances of this project are somewhat unique in terms of the various factors that had to be addressed.*

*The Master Plan does not contain specific information on infrastructure replacement and no open space parcels are currently identified as potential locations for future infrastructure replacement.*

## ATTACHMENT B

### *Project Summary*





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ENGINEERING NJ #24GA28019100  
LAND SURVEYING NJ #24GA28019100  
LANDSCAPE ARCHITECTURE NJ #24GA28019100

## **PARS2001: Replacement of Well 20, Block 736, Lots 9.01 & 9.02, Minor Diversion, Parsippany, NJ**

July 7, 2021

Morris County Open Space Commission

### *Project Summary*

The Township of Parsippany-Troy Hills (the “Township”) appreciates the Morris County Open Space Trust Fund Committee’s (the “Committee”) time in considering the application for a Minor Diversion of a portion of the Smith Road Sheep Farm property designated as Block 736, Lots 9.01 and 9.02 on the official Township tax map (the “Property”). On behalf of this Township, this submission was prepared to assist the Committee in understanding the importance of this minor diversion request, and why the Property was determined to be the only suitable option for locating a replacement for the Township’s Well 20.

This summary is intended to provide an overview of the history of this project since 2017 and discuss why the Property is the best alternative for a replacement for Well 20. The details are described below, but the general steps so far include:

- 2017: Determination by the Township that the capacity of Well 20 had decreased following rehabilitation efforts and that a new replacement well was needed.
- 2017: Determination by the Township that water pumped from Well 20 would require treatment for tetrachloroethene (PCE), and that the current parcel for Well 20 was not considered viable for construction of a new treatment building due to floodplain and other site constraints.
- 2017: Determination that another parcel in the vicinity would be needed for the replacement well and treatment building. Existing Township-owned parcels in the area were reviewed for suitability for development of a new well. The Township considered several additional parcels in the process, however each one had circumstances that made them unsuitable for a replacement well (discussed further below).
- 2017 - 2018: Prioritization of three parcels based on mapped aquifer thickness and necessary setback distances from streams, wetlands, sensitive specie habitats, other supply wells, and sources of known contamination. Exploration borings were completed at three locations (one at each parcel). Determination that the Property was the only parcel that had subsurface materials suitable for development of a replacement for Well 20.
- 2018: The NJDEP Green Acres Program contacted for possibility of obtaining a minor diversion of a small portion of the Property for the location of a replacement well.
- 2019: Request and attendance by the Township at a pre-application meeting with the NJDEP regarding the project.
- 2019 - 2020: Extensive discussions between the Township and representatives of the NJDEP Green Acres Program regarding the project and the alternatives analyses of many other sites (14 parcels total). In addition, at the request of the NJDEP, testing of the Property for viability for development of a production well.
- May 2020: Submission by the Township of its minor diversion pre-application package to the NJDEP Green Acres.
- September - October 2020: Construction of a test production well, conduction of preliminary testing, and preparation an Aquifer Test Plan for NJDEP Green Acres review and approval. Preparation and submission of a well viability summary to NJDEP Green Acres.
- Spring 2021: Authorization by the NJDEP Green Acres to permit Township to submit Part 1 of its Minor Diversion Application. Submission of the application package.

- February - April 2021: Approval of the Township's NJDEP Aquifer Test Plan by the NJDEP Bureau of Water Allocation.
- March - April 2021: Completion of the aquifer test of the test production well.
- April - May 2021: Approval by the NJDEP Green Acres of the Township's Part 1 Minor Diversion Application and authorization to proceed with public hearing. Public notices sent out to residences within 200 feet of the parcel as well as the Township and County governing bodies, planning boards, environmental commissions, and open space advisory committees.
- May 2021: Notification by Morris County that the Property was dedicated parkland as a result of Morris County's contribution from the Morris County Open Space, Farmland, Floodplain Protection and Historic Preservation Trust Fund towards the acquisition of the Property. Immediately upon notification, submission by the Township of all NJDEP Green Acres application materials to Morris County for review.
- May 13, 2021: Public hearing held by the Township on the minor diversion application. Following hearing, public comment period held for 30 days; no comments received from the public during the hearing or during the public comment period.
- May 27, 2021: Presentation to Morris County on the minor diversion application.
- May - July 2021: Preparation of responses to Morris County and this summary to provide additional information regarding the minor diversion application process to date.

### **Background**

The Township is tasked with providing an adequate supply of drinking water which meets all the requirements of the USEPA and NJDEP. This involves maintenance of the existing groundwater sources which supply the Township's water system including well rehabilitation and well replacement as needed; maintenance of treatment and the distribution system, and water sampling and reporting to ensure the water supplied to the Township customers meet all the drinking water regulations. The original Well 20, which was installed in 1986, had to be taken out of service in 2017 due to a combination of reduction in capacity as well as a persistence of detections of tetrachloroethene (PCE) concentrations from an off-site source which were just slightly below the current NJDEP maximum contaminant level (MCL). Maintenance rehabilitation of Well 20 had already been completed in 2013 to restore the well capacity, but the capacity quickly decreased again by 2017. Due to the concentrations of PCE detected in samples collected from Well 20 while in service, future treatment would likely be needed to meet the safe drinking water limits. The combination of the current lot size and topography, and proximity to Troy Brook limit the area and accessibility for the installation of a replacement well and construction of treatment of PCE. Based on the existing site constraints, the replacement of Well 20 required relocating the well to another hydrogeologically-favorable and available parcel in the same pressure district of the service area.

### **Requirements for a Drinking Water Well Location**

In 2017, the Township began evaluating options for replacement of Well 20 which would provide a well with an equal capacity, and space without constraints for construction of treatment building to address the elevated PCE. Several Township-owned lots and private parcels were identified as possible sites for a replacement well and treatment building. These locations were reviewed in combination with mapping showing the extent and thickness of the buried valley aquifer (BVA) system tapped by Well 20, existing supply wells (PTHWD and others), NJDEP identified Known Contaminated Sites (KCSs), and Groundwater Classification Exception Areas (CEAs) identifying areas identified as exhibiting groundwater contamination occurring above the New Jersey Ground Water Quality Standards.

By way of background, geologic materials generally can be categorized into two classes: rock and unconsolidated material, typically sand and gravel. The term "aquifer" describes an underground layer of

water-bearing geology. Groundwater depth and geological formation thickness vary and therefore aquifer thicknesses vary from location to location. In the Township area, specifically in the vicinity of the Property, the main aquifer is called the “Buried Valley Aquifer” (BVA) and it is exactly as it is described. This aquifer was formed within a former valley which was filled with sediment deposits as glaciers melted. As a result, the aquifer thickness in this area is highly variable depending on the bedrock surface. Simply put, this means that the aquifer can be shallow to nonexistent in some areas and thicker in others. The sediment size also varies depending on where and how the material was deposited. Relevant to the Township’s evaluation of locations for a replacement well, this means that not all areas are suitable for construction of a primary supply well like Well 20.

Further, there are certain geological formations that are more conducive for installation of wells. Larger-grained soils (like sand and gravel) have more pore space between the soil particles that accommodate a larger volume in addition to allowing groundwater to move more freely through the formation. These qualities allow groundwater to be extracted through a supply well at a quantity to accommodate the customer demands of the public system. Conversely, smaller-grained soils (like silt and clay) are more tightly formed, meaning there is less space between the particles and water has a harder time traveling through these formations. Bedrock also needs to have significant fractures to allow water to travel through it. Bedrock in this area is generally not prolific enough to provide the quantity of water needed to serve the Township. Therefore, the aquifer material underlying the site was an important part of selecting a parcel suitable for construction of a replacement for Well 20.

In light of the foregoing constraints, the Township conducted a preliminary prioritization of potential well sites. Ideally, the glacial sand and gravel deposits need to extend to at least 100 feet below grade, and must not contain an abundance of fine-grained material. Further, the NJDEP requirements for construction of a public community well include that the upper 50 feet need to have solid casing to prevent surface and shallow contamination. The size and shape of the parcel must also accommodate NJDEP required distances from property lines and from potential sources of contamination such as sewer lines. In addition, the parcel must be located an adequate distance from streams and floodways, wetlands, sensitive habitats, KCSs and CEAs, and major roadways (due to road salting concerns) as well as other supply wells to avoid water level and capacity interference impacts.

### **Well Exploration Program**

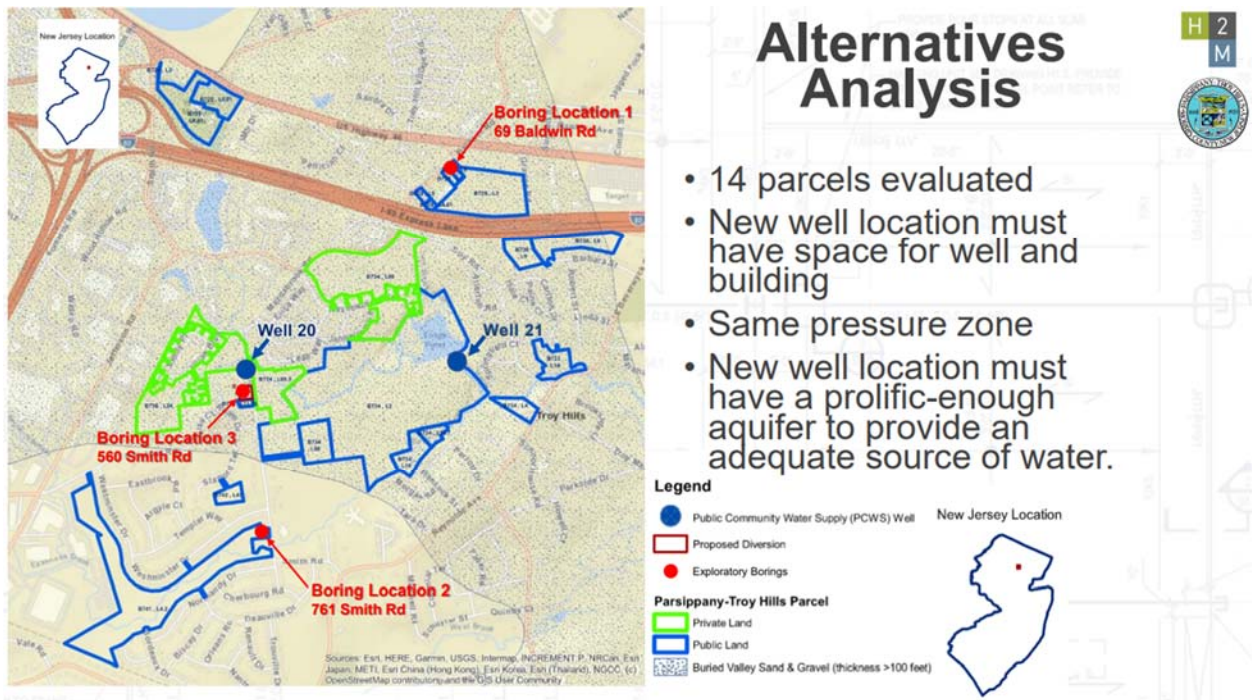
Of the parcels considered, only three parcels: Block 728, Lots 7 and 8 (69 Baldwin Road); Block 741, Lot 4.2 (761 Smith Road) and Block 736, Lot 9.01 (the Property) met the above criteria. The Township conducted exploratory boring and possible small diameter test well locations were selected based on setback distances from surface water bodies and wetlands, and accessibility with a standard drill rig. An exploration program was completed from August through October 2018. Each of the three sites were evaluated by advancing boreholes through the overburden using a “sonic” drill rig to enable continuous sampling. A total of four borings were completed with two of them converted to a small diameter observation monitoring wells. Two borings were completed at Block 728, Lots 7 and 8 (69 Baldwin Road). Both borings encountered bedrock at shallow depths of 44 and 65 feet below grade (ft bg) resulting in inadequate thickness for construction of a replacement well. A third boring was completed at Block 741, Lot 4.2 (761 Smith Road), which encountered bedrock at 80 ft bg. The thickness and grain-size makeup of the encountered material were not conducive to the replacement well. A fourth boring was completed at the Property and was completed to a depth of 130 feet without encountering bedrock. Much of the material was coarse-grained consistent with the BVA, and the hydrogeologic conditions encountered at this location were favorable for supporting a replacement well. The second small diameter observation well was constructed at this location.

### Alternatives Analysis

Upon determining that the Property met all the criteria for developing a replacement for Well 20, the NJDEP Green Acres Program was contacted to discuss the need for a minor diversion of a portion of the Property. We understand that the disposal or diversion of Green Acres and Open Space land for other than recreation and conservation purposes should be “a last resort, and should only be considered by a local government unit when the proposed disposal or diversion is necessary for a project that would satisfy a compelling public need or yield a significant public benefit...” The ability to develop a cost-effective replacement to a failed water supply source to continue to meet the demands of the Township, without potentially impacting sensitive habitats and wetlands, furthers a compelling public need and significant public benefit.

As indicated previously, there is specific criteria for selection of an adequate location for constructing a replacement well. Ideally, the location should be within 100 feet of the existing well, tap the same aquifer at roughly the same depth, and have the same or less pump capacity. Based on reported information, and the results of the exploration work completed in 2018, selection of an available location in proximity to Well 20 with adequate thickness and suitable materials may be somewhat limited. The location of the well needs to be placed within the same pressure district for the system and should be located within the same radius of influence of Well 20 to benefit from the same recharge capacity and to minimize the spread of contamination beyond that already resulting from the pumping of the original well. The new well also needed to be an adequate distance from other Township and other supply wells to avoid well interference where the pumping of one well lowers the water level in the aquifer and negatively affect the capacity of another well.

All these factors were considered in both the initial assessment of a potential replacement well location and the Green Acres alternative analysis. Below is a table which summarizes the fourteen (14) locations considered for construction of a replacement well for Well 20, and a map showing the locations.



The parcels considered as part of the alternatives analyses are summarized as follows:

Block / Lot	Distance from Well 20 (feet)	Is BVA >100 feet thick?	Proximity to Major Roadways	Mapped Wetlands and/or Sensitive Habitats	Contamination Potential	Notes*
B725 / L2, 4.01, 5.01	3,200+	Yes	Yes (Rt. 80, I-287, Rt. 46)	Yes	No	Not viable. Reasons 1 and 2.
B730 / L5, 6	4,300+	Yes	Yes (Rt. 80)	Yes	No	Not viable. Reasons 1 and 3.
B733 / L18	4,800	Yes	No	Yes	No	Not viable. Reason 3.
B734 / L4	4,000	Yes	No	Yes	No	Not viable. Reason 3
B734 / L16.7, 18	3,100	Yes	No	Yes	No	Not viable. Reason 3.
B734 / L2 B734 / L68	1,800	Yes	No	Yes	No	Not viable. Reasons 2 and 8.
B734 / L65.3	700	Yes	No	Yes	No	Not viable. Reasons 2 and 7.
B734 / L69	2,100	Yes	No	Yes	No	Not viable. Reasons 2, 3, 5, 6, and 7.
B736 / L24	500	Yes	No	Yes	No	Not viable. Reasons 2, 3, 5, 6, 7, and 8.
B736 / L11.15	1,000	Yes	No	No	No	Not viable. Reason 6 and 9.
B742 / L47	2,400	No	No	No	No	Not viable. Reason 4
B728 / L3, 4.01, 5, 7, 8	4,000	No. Boring completed at site. Bedrock encountered between 45 to 65 feet.	Yes (Rt. 80)	No	Yes	Not viable. Reason 4.
B741 / L4.2	3,000	No. Boring completed at site. Bedrock encountered at 80 feet.	No	Yes	No	Not viable. Reason 4.
<b>B736 / L9.01</b>	<b>900</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Very good candidate for replacement well. Boring completed at site. BVA &gt;130 feet.</b>

\*Reasons sites were considered to not be viable for the replacement well:

1. Proximity to major roadways.
2. Proximity to wetlands and/or sensitive habitats.
3. Proximity to existing wells, which could cause interference and reduce productivity and capacity of all wells.
4. Aquifer thickness insufficient.
5. Limited access.
6. Stormwater detention area, which can cause water quality issues.

7. Private parcel.
8. Known flood zone.
9. Site geometry unfavorable (e.g. setback requirements unable to be accommodated)

As is evident from the above table, except for the Property, each of the other locations have one or more unfavorable aspects which eliminate it from consideration as a replacement well location. The NJDEP Green Acres was satisfied with this alternatives analysis and has indicated its support for use of the Property as a replacement well location.

### **New Well Construction and Testing**

As part of the NJDEP Green Acres application for a minor diversion, the Township needed to prove that the Property was viable for development of a suitable replacement well for Well 20. As such, the Township proceeded with the construction of a test production well at the site. A full-scale production well was constructed consistent with NJDEP requirements for a potable well. These requirements ensure that wells are properly constructed and maintained with a goal of protecting the groundwater system, which is a limited resource, and dictate the proposed well geometry, estimated capacity, and construction method. The NJDEP also requires a minimum of 50-foot-deep casing as a safety requirement to isolate the well and prevent issues that can arise from surface contamination. Further, as part of this process, it must be demonstrated to the NJDEP that a well is viable following installation if it is intended to be incorporated into an allocation permit. Beyond the aquifer thickness, its horizontal extent is also important, as there has to be the ability for the aquifer to recharge and continue to provide a consistent volume of water without being depleted.

Following installation of the test production well, the Township submitted a well completion report to the NJDEP. The report satisfactorily demonstrated the productivity of an aquifer and viability of a replacement well and was approved by the NJDEP.

The Township also performed an aquifer test on the replacement well to demonstrate viability. A constant rate pumping test was performed; the well was pumped at a rate of 840 gallons per minute (gpm) over a period of more than 72 hours. During this time, the well was able to sustain this volume, and did not demonstrate negative impact on nearby shallow wet areas or other Township wells. Just before the pumping test was concluded, an NJDEP-approved laboratory was on site to collect water quality samples for testing. The results of water quality testing results showed that the water quality was similar to that of the existing Well 20 and would require treatment for PCE concentrations in the local aquifer.

### **Preliminary Design and Layout**

The preliminary layout and design of the proposed treatment building focused on minimizing the requested diversion and any impact to the green and open space. Importantly, no trees will be removed as part of the construction, and the driveway will be completed with gravel and not paved. Although the intent was to place a fence around the area proposed for diversion, the Township will look into other security measures to minimize access blocked to wildlife in the area. The Township has also considered the option of doing additional landscaping at the site to further camouflage the building from the view of the road.

Though the full acreage of the minor diversion request is 0.164 acres (indicated by the yellow area in the figure below), the actual permanently disturbed area will include the building, sidewalk, and gravel driveway and is estimated to be only 0.062 acres (indicated by the cyan area in the figure below). The remainder of the minor diversion will be left undisturbed, with marginal landscaping for the purposes of practicality and safety.



Figure 1. Site Aerial Map

The estimated size of the building is dictated by the expected treatment needs. The exterior design of the treatment building is meant to resemble a residential structure to allow it to inconspicuously blend into the neighborhood. Typical well and treatment buildings tend to look more industrial and stand out as utility structures. The reason that the currently proposed design for the well and treatment building resembles a residential structure is that this aesthetic choice would be the most inconspicuous option for a structure that was located amongst other residential buildings and was located close to a road. The Parsippany Soccer Club building is on the adjacent lot (also a Green Acres parcel) and the look of this building (colonial with shutters) was used as the primary inspiration for the treatment building design.

### Summary

As evidenced above, the Township's search for a replacement well has been ongoing for several years. The Township, in consultation with representatives of the NJDEP Green Acres Program, engaged in extensive research and analysis to find an appropriate site for the replacement of Well 20.

As part of its NJDEP application process, the Township considered fourteen (14) publicly and privately owned parcels to explore as part of a more in-depth alternatives analysis. The alternatives analysis ended up eliminating all other sites from consideration and determined that the Property is the only viable parcel for a replacement well and was approved by the NJDEP Green Acres.

The Township fully understands the importance of the preservation and enhancement of open space in the Township. The Township acknowledges that the location of the replacement well on preserved parkland is

not ideal, but unfortunately, there is no other viable alternative. The replacement well serves a compelling public need to ensure a safe and adequate supply of drinking water and yields a significant benefit to the public.

We trust that this summary is helpful to the Committee in its consideration of the Township's minor diversion application. We look forward to presenting the application to the Committee at an upcoming special meeting date and to addressing any additional comments or questions. We encourage the Committee to reach out with any additional questions or concerns in advance of that meeting date.



## ATTACHMENT C

*NJDEP Green Acres Preliminary Approval*

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**From:** Taylor, Adam [DEP] <Adam.Taylor@dep.nj.gov>  
**Sent:** Tuesday, July 6, 2021 11:12  
**To:** Diane Hickey  
**Subject:** Parsippany-Troy Hills - Minor Diversion Application

Hello Diane,

Barring any unforeseen issues with Part 2 of the final application, Green Acres intends to recommend approval of Parsippany-Troy Hill's proposed minor diversion for the Smith Road Replacement Well on Block 736, Lot 9.01 to the NJDEP Commissioner and State House Commission.

The recommendation will be made based on the Township fulfilling the following criteria:

- The public need / public benefit for this project is clear.
- The Township, through its alternatives analysis, has demonstrated to the Green Acres' satisfaction that there is no feasible, reasonable and available alternative for this project.
- The Township has agreed to compensate for the diversion of funded parkland in a manner that complies with Green Acres regulations.

Please let me know if you have any questions.

Thank you,  
Adam

Adam Page Taylor  
Bureau of Legal Services and Stewardship  
NJDEP, Green Acres Program  
[www.nj.gov/dep/greenacres](http://www.nj.gov/dep/greenacres)

