



Combe Fill with
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UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

P.O. Box 534
705 White Horse Pike
Absecon, New Jersey 08201

February 26, 1981

Mr. Edward R. Russo
Council President
Township of Chester
P.O. Box 428
Chester, New Jersey 07930

Dear Mr. Russo:

This is in reference to a proposal by Combe Fill Landfill, Parker Road, Chester Township, Morris County, New Jersey, to fill wetlands and expand their active sanitary landfill by approximately 100 acres in Chester and adjacent Washington Township. On behalf of the Chester Township Municipal Council, a February 19, 1981, telecon with Mr. Darryl Caputo, Executive Director of the Upper Raritan Watershed Association, requested that this Service evaluate and submit comments and recommendations on the wetland habitat proposed for fill.

On February 13, 1981, representatives of the U.S. Army Corps of Engineers (COE), the Environmental Protection Agency (EPA), Combe Fill and this Service inspected the wetlands proposed for filling. Fish and Wildlife Service biologists observed that the area to be filled supports a palustrine broad-leaved deciduous forested wetland (PF01). This field inspection verified our recent National Wetlands Inventory which classified and delineated this area as PF01. This inventory is based on a combination of remote sensing techniques, field investigations and a thorough review of collateral data sources, including vegetation, hydrology and soils. The PF01 wetland type occurs where moisture is relatively abundant, particularly along streams and at higher elevations.

The PF01 wetland observed at Combe Fill contains an overstory of woody vegetation approximately 30 feet in height, a sparse understory of young trees and shrubs and a herb layer. Some of this vegetation has been cleared. Since the site was inspected during the dormant season, the diverse assemblage of herbaceous species associated with PF01 wetlands was not present. Red maple (Acer rubrum) represented the predominant tree species. Floral species associated with PF01 wetlands, such as sphagnum moss (Sphagnum spp.), groundpine (Lycopodium obscurum), ferns (Polypodiaceae) and bunch grasses were also observed. In general, red maple wetlands appear to be flooded for long periods early in the growing season and remain quite moist throughout the year. As such, these wetlands represent one of the most hydric of the forested wetlands in northern New Jersey. Although a severe drought persists throughout northeastern New Jersey, hydric site conditions, including standing water, were observed at Combe Fill.

100230

Wetlands have been documented in the scientific literature as being extremely productive habitats in a forested ecosystem. Detritus produced by the annual death and decay of herbaceous vegetation not only contributes to productivity, but is the base of the food web. Wetlands vegetation is a habitat for invertebrates which serve as a food source for higher trophic levels. This vegetation also provides habitat for many faunal species. Additionally, wetlands filter upland runoff and thereby improve water quality. Water quality is one of the most important natural resource factors for Chester Township to consider since its human community is dependent on drinking water wells. Consequently, it is our position that wetlands are essential to the ecosystem and related human uses and that they should be preserved.

You may find it beneficial to investigate the EPA Sole Source Aquifer Program. This program is applicable in an area such as Chester that is dependent upon drinking water wells. Unfortunately, Combe Fill Landfill does not contain an impervious barrier to leachates. We have been informed that trace levels of highly toxic water contaminants, including lead, arsenic and mercury, have been found in the waters draining Combe Fill. Further information concerning the EPA Sole Source Aquifer Program is available through Ms. Eileen Reilly-Wiedow, an environmental Scientist with the EPA Water Supply Branch in New York City (212-264-5166). In regard to Combe Fill, Mr. John Friskco, with the EPA Hazardous Waste Branch (212-264-1573) and Mr. Walter Burshtin, with the New Jersey Department of Environmental Protection (DEP), Bureau of Solid Waste Management (609-292-9120), are involved with this landfill on the federal and state levels, respectively.

Mr. Joseph Hudek of the EPA (212-264-5172) is available for answering inquiries concerning Section 402 under the "Clean Water Act" and the National Pollutant Discharge Elimination System (NPDES). A NPDES Section 402 permit may be required by Combe Fill since the construction of a ditch to drain the landfill and discharge leachates into Trout Brook is proposed. Trout Brook flows into Hacklebarney State Park and is classified as trout production waters by the State of New Jersey. A major concern of the New Jersey Division of Fish, Game and Wildlife is to preserve such waters in their free-flowing state. Requests for additional information on Trout Brook and trout production waters should be directed to Mr. A. Bruce Pyle of the Division's Bureau of Freshwater Fisheries (609-292-1599). Furthermore, under the "Clean Water Act" a Department of the Army Section 404 permit may be required if the COE decides to exert discretionary jurisdiction over the wetlands contained in Combe Fill Landfill. This Service is currently coordinating with the Corps in this matter. If the COE were to exert discretionary jurisdiction, we would then evaluate and comment on the required permit application pursuant to the Fish and Wildlife Coordination Act.

We hope that this information is sufficient to assist you in your meaningful pursuit to help protect wetland habitats and incorporate an ecological consciousness in land use planning in Chester Township. We are available to meet with you and other representatives of Chester Township to discuss this matter further. We recommend that such a

meeting also be attended by representatives of the EPA, COE, Soil Conservation Service, the State of New Jersey DEP Bureau of Solid Waste Management and Bureau of Freshwater Fisheries, Washington Township, Morris County Health Department, the Upper Raritan Watershed Association and Combe Fill.

Please keep us informed of your progress.

Sincerely,



Oliver T. Edstrom
Assistant Field Supervisor

ES:Absecon

CC: ASO files

SCFO files

J. Hudek - EPA, N.Y.C.

E. Reilly-Wiedow EPA, Water Supply, N.Y.C.

J. Friskco EPA, Hazardous Waste, N.Y.C.

W. Slezak - COE, Permits, N.Y.C.

W. Burshtin - NJ DEP, Solid Waste, Trenton, NJ

A.B. Pyle - NJ DFG&W, Freshwater Fisheries, Trenton, NJ

D. Caputo - URWA, Gladstone, NJ

SCS, Morristown, NJ

Washington Township Clerk, Washington, NJ

100232