
OFFICE OF THE MAYOR

TOWN OF GUTTENBERG

MUNICIPAL BUILDING
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August 20, 2025

New Jersey Department of Environmental Protection
Office of Transactions and Public Land Administration
Public Land Compliance Section

Re: Opposition to Proposed Parkland Diversion – Braddock North Hudson County Park

To whom it may concern,

On behalf of the Town of Guttenberg, I write to express our strong opposition to the proposed parkland diversion application for the placement of the North Bergen Pre-K school trailers and the EMS South Building within James J. Braddock North Hudson County Park (“Braddock Park”).

Braddock Park is one of the most important public green spaces in our region, serving as a vital resource for recreation, conservation, and community health for thousands of residents in North Hudson County, including Guttenberg. The continued occupation of parkland for non-recreational purposes directly conflicts with the mission of the New Jersey Green Acres Program and violates the regulatory protections set forth in N.J.A.C. 7:36.

As you are aware, N.J.A.C. 7:36-26.1(a) strongly discourages the diversion of both funded and unfunded parkland, noting that such diversion should only occur as a last resort and only when there is a demonstrated compelling public need or significant public benefit. Furthermore, N.J.A.C. 7:36-26.10 authorizes denial of such applications where adverse consequences would result that cannot be adequately mitigated through proposed compensation.

In this case, the continued diversion of Braddock Park land for school trailers and the EMS South Building fails to meet these substantive criteria. It does not fulfill a compelling public need that outweighs the loss of recreational and conservation land, nor does it provide for expanded recreational benefits exceeding the loss of public space. Instead, this proposal undermines the integrity of our shared regional park system and sets a troubling precedent for future encroachments on protected parkland.

Please be advised that this position is informed by numerous comments and concerns we have solicited from our residents, many of whom rely on Braddock Park for daily recreation and quality of life. In addition, the Guttenberg Town Council will be considering a formal resolution opposing this application on Wednesday, August 27, 2025.

For these reasons, the Town of Guttenberg stands with neighboring municipalities, residents, and advocates in firm opposition to this diversion. We urge the NJDEP to reject the application and to work with the Township of North Bergen and the County of Hudson to identify alternative, non-parkland sites better suited for these critical facilities.

Thank you for your consideration and for your continued stewardship of New Jersey’s public parklands.

Respectfully submitted,

Wayne D. Zitt, Jr.
Mayor

WAYNE D. ZITT, JR.
MAYOR