

**REVIEWING THE PINELANDS
COMPREHENSIVE MANAGEMENT PLAN**

**Compilation of Possible Issues and
Topics for Pinelands
Commission Evaluation**

December 16, 1991

New Jersey Pinelands Commission

Introduction

On October 1, 1991 the New Jersey Pinelands Commission formally launched its second comprehensive review of the Pinelands Comprehensive Management Plan (CMP) by extending an invitation to many interested individuals and organizations to outline important topics and issues which they feel the Pinelands Commission should consider during its review. At the same time, the Commission's staff began to compile a companion list of possible topics based upon other sources, including the Public Program Committee's 1990 issues survey, recent studies and reports, and its experience in administering the CMP over the last several years. The results of these efforts are presented in this compilation of topics and issues.

This report, along with The Second Progress Report on Plan Implementation, will be considered by the Commission when it meets in late February, 1992 to identify and select what it considers to be the five most important topics facing the Pinelands in the coming years. Once these topics are identified, interested parties will be invited to outline specific recommendations (such as research initiatives, regulatory changes, legislative initiatives, cooperative efforts with other governmental agencies, etc.) which the Commission may wish to pursue to address the topics. Panels of experts will also be convened to develop alternative approaches to address each of the priority topics.

In preparation for the Commission's February meeting, the Plan Review Committee will be meeting in January to discuss the topics outlined in this report. Although the Committee will not be making any decisions at that time, the discussion will afford Commission members an opportunity to become better acquainted with the issues and topics which have been identified to date. Those individuals and organizations who have contributed to this report will also have an opportunity to elaborate on their recommendations at that time.

For more information on this report or other matters pertaining to the Pinelands Commission's review of the Comprehensive Management Plan, please contact Mr. Larry Liggett, Manager of Planning and Research, by mail (Pinelands Commission, P.O. Box 7, New Lisbon, New Jersey 08064) or by telephone (609-894-9342).

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Part 1

Topics Identified by Interested Parties

Topics recommended by interested parties have been submitted in several different formats. This material has been reproduced here in the same form as it was submitted so that the Pinelands Commission may benefit from the precise recommendations and explanations presented by each organization and individual.

Readers should note that some background information submitted with the recommended topics has not been reproduced but is available for review at the Pinelands Commission office. Notations have been added at the end of the applicable Topic/Issue forms to indicate what materials are on file.

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1 of 5

A. Proposer (agency, name, etc.): Lacey Township Environmental
Commission, 818 West Lacey Road, Forked River, NJ 08731

B. Topic/Issue: Forestry

C. Topic/Issue is/will be of importance:

 X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Are current goals and objectives protecting this
Pinelands resource

(continue on back)

2. Are current management plans and practices meeting
goals and objectives

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2 of 5

- A. Proposer (agency, name, etc.): Lacey Township Environmental Commission

- B. Topic/Issue: Resource Extraction

- C. Topic/Issue is/will be of importance:
 X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. Should this land use be allowed to continue in the preservation area and forest areas

(continue on back)
2. Do restoration methods meet goals and objectives

(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 3 of 5

- A. Proposer (agency, name, etc.): Lacey Township Environmental Commission

- B. Topic/Issue: Solid Waste

- C. Topic/Issue is/will be of importance:
 X immediately
 X in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. Do current policies adequately address evolving technologies and trends

(continue on back)
2. Are current goals and objectives protecting the Pinelands today: will they in the future

(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 4 of 5

A. Proposer (agency, name, etc.): Lacey Township Environmental
Commission

B. Topic/Issue: Infrastructure

C. Topic/Issue is/will be of importance:

 immediately
 X in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Does a comprehensive policy/program exist that will
protect the pinelands and provide for its residents

(continue on back)

2. How will new development effect existing infrastructure
and how will pressure for new services be addressed
locally, regionally.

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 5 of 5

A. Proposer (agency, name, etc.): Lacey Township Environmental Commission

B. Topic/Issue: Recreation

C. Topic/Issue is/will be of importance:

 immediately
 X in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Need to evaluate uses to determine long term impact on Pinelands resources

(continue on back)

2. Are we loving the Pinelands to death -- should access be restricted to sensitive areas/should certain uses be restricted

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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State of New Jersey
Department of Environmental Protection and Energy
Division of Parks and Forestry
CN 404
Trenton, NJ 08625-0404
Tel. # 609-292-2733
Fax. # 609-984-0503

Scott A. Weiner
Commissioner

Gregory A. Marshall
Director

MEMORANDUM

Donna
TO: Donna Mahon, Administrative Assistant
Natural and Historic Resources

FROM: Carl R. Nordstrom, Deputy Director
Division of Parks and Forestry *CRN*

DATE: November 22, 1991

RE: Division of Parks & Forestry Issues: Pinelands
Comprehensive Management Plan Review

The Division of Parks and Forestry hereby recommends that the following issues be addressed relative to the above noted subject.

1. Enforcement demands resulting from regional growth in Ocean, Atlantic, and Cape May Counties, as well as, in poriferal areas, is placing increased pressures for recreational opportunities, as well as, illegal usage of protected areas.

Pinelands protection and enforcement cannot keep pace with increased usage unless existing law enforcement units expand with this demand. Recent state budgets have been unable to accomplish this. Federal assistance should be sought.

2. Revision of Pinelands Endangered and Threatened Plant species list (see attached).
3. Forest Fire Management - During the last review of the Comprehensive Plan, the building safety standards for Forest Fire Protection were changed to recommendations instead of requirements. In lieu of the serious potential of an "Oakland fire", provisions for forest fire protection should be implemented and enforced for building clearances to fuel sources, lot clearing and general clean-up of residential areas.

Donna Mahon
Page 2
November 22, 1991

4. Forest Management - The original Comprehensive Management Plan outlined a philosophy to encourage forestry in the Pinelands as a strategy to provide a legitimate private use of the land, perpetuate the forest and continue the traditional uses of the Pinelands area. Agriculture remained exempt, forestry was to be a permitted use when done in compliance with an approved plan.

Not only has the permit process been complicated to the extent that it may take years to get a permit, but one by one forestry management tools are being taken from landowners. The withdraw of time-proven techniques has also impacted on state-lands management.

The result has been to discourage forestry practices not encourage it. One suggestion is to make forestry exempt as agriculture, revisit the philosophy, reduce the permit time and encourage forestry practices once more.

Please review and if you have any questions please let me know.

C.R.N.

CRN/rm

Attachments

- c. Director Marshall
Dick Barker
Olin White
Tom Hampton

Item # 2

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): _____

B. Topic/Issue: Revision of Pinelands Endangered and
Threatened Plant Species List to include additional
species now known to be endangered or threatened.
Adequate documentation is now available to justify
adding species to the list.

C. Topic/Issue is/will be of importance:

 X immediately
 in the short term (next 5 to 7 years). or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Pinelands list is more than 10 years old and
lacks many species currently known to be
endangered or threatened.
(continue on back)
2. These additional endangered plant species are likely to be
extirpated from the Pinelands if habitat destruction is
not controlled. Threatened species are likely to become endangered.
(continue on back)
3. These rare plant species contribute to the distinctive
essential character of the Pinelands. Their habitat is
critical to their survival and should be protected.
(continue on back)

-over-

- E. Related Issue(s), if any: The Pinelands Land Acquisition Plan should evaluate how adequately endangered plant species habitat is being preserved.
-
- F. Relevant Documentation (list and attach if available any reports, etc.): 1987 Natural Heritage Program Recommended Additions to Pinelands Endangered and Threatened Plant Species (This will need to be rechecked with current information); 1987 Natural Heritage Database Report on Rare Plants of the Pinelands National Reserve (This will need to be updated with information currently in the Natural Heritage Database)
- G. Known Experts on Issue, if any: N.J. DEPE Division of Parks, Forestry, Office of Natural Lands Management.
-
-

Pinelands Commission Notation:

Supplemental material (two lists of endangered and threatened plants, 1987) to this submission is on file at the Commission available for review.

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): Green Acres

B. Topic/Issue: Revisit the Land Acquisition Program and refine to reflect management and recreation needs as well as resource protection requirements as appropriate.

C. Topic/Issue is/will be of importance:
X immediately
X in the short term (next 5 to 7 years) or;
X longer term (beyond 7 years)

- D. Reasons for Importance:
1. The current Land Acquisition Program has identified 97,000 acres for state acquisition but does it reflect the region's ultimate acquisition needs?
(continue on back)
 2. The current Land Acquisition Program does not include many of the parcels that the State land administering agencies have recommended for management efficiency.
(continue on back)
 3. Recreation needs that can be met through the land acquisition program (e.g. water access sites for fishing and boating, prime upland and waterfowl hunting areas) should, perhaps, receive greater attention
~~(continue on back)~~
in the formulation of the region's ultimate Land Acquisition Program.

-over-

4. Lands outside of the Preservation Area because of the potential for future development may deserve higher state acquisition perspective than areas presently slated for acquisition.

E. Related Issue(s), if any: The relationship of regulatory resource protection to public land acquisition needs to be explored.

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: Division of Parks & Forestry, Division of Fish, Game and Wildlife Management, Green Acres, and other DEPE agencies.

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PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # 3

A. Proposer (agency, name, etc.): Green Acres Program

B. Topic/Issue: Recreation Development - Community Park Development and Water Access

C. Topic/Issue is/will be of importance: X immediately, X in the short term (next 5 to 7 years) or, X longer term (beyond 7 years)

D. Reasons for Importance: 1. Pinelands municipalities with designated growth areas need intensive use recreation areas to meet growing needs for such activities as soccer, softball, baseball, football and tennis (continue on back) 2. Provision of water access is a major objective for community development but many parks lack sufficient shoreline to meet CMP shoreline ownership requirement (1000 feet). (continue on back) 3. (continue on back)

-over-

E. Related Issue(s), if any: Communities are often reluctant to
commit a portion of the limited land within their growth areas to
recreation development.

F. Relevant Documentation (list and attach if available any
reports, etc.): _____

G. Known Experts on Issue, if any: Division of Fish, Game and Wildlife
Management Division of Parks & Forestry and Green Acres.

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Division of Fish, Game and
Wildlife

B. Topic/Issue: Land application of sewerage sludge

C. Topic/Issue is/will be of importance:

- X immediately
 X in the short term (next 5 to 7 years) or;
 X longer term (beyond 7 years)

D. Reasons for Importance:

1. Elimination of ocean dumping will shift pressure to public
conservation and recreation lands - proposals have already
been made to utilize Passlee WMA as a sludge disposal area.
Such use could eliminate public outdoor recreation and, over
time, may contaminate wildlife with heavy metals due to soil
saturation.

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: Dr. D. Boscoe, Division
of Fish, Game and Wildlife

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PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

drp

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION #

A. Proposer (agency, name, etc.): City of Estell Manor

B. Topic/Issue: 1 Transfer of Pinelands credits out of municipality 2 Erosion of tax base by unduly restrictive Pinelands regulations 3 Discouragement of desirable commercial uses

C. Topic/Issue is/will be of importance: by unduly restrictive Pinelands regulations (CONTINUED ON BACK)

X immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

D. Reasons for Importance:

1. As per letter of Richard Russell, Esq. (continue on back)

2. (continue on back)

3. (continue on back)

-over-

- B. (4.) Inflexible attitude of Pinelands Commission
- D. (4.) Recent communications from Pinelands Commission indicates a negative attitude toward exceptions to Pinelands regulations. Pinelands Commission is ignoring provisions of the legislation creating it and giving it authority which solves the need for flexibility. Pinelands Commission complained that it made 77 exceptions in over a million acres. This appears to be unduly conservative rather than liberal, as Pinelands Commission suggests.
- B. (5.) Negative impression that overly strict Pinelands regulations are creating on South Jersey citizenry.
- D. (5.) Pinelands Commission is only as strong as its enabling legislation. Loss of public support would eventually result in legislation changing authority of Pinelands and an erosion of its powers. Pinelands Commission must realize that its continued inflexibility will sooner or later lead to a "citizen's revolt" against the Pinelands which will destroy the very powers which it is seeking to enforce.
- B. (6.) In the last few years, we have taken numerous parcels back from owners, who have not been able to sell due to Pinelands restrictions.
- D. (6.) See letter of Richard Russell, Esq.

E. Related Issue(s), if any: Balancing Pinelands regulations
with needs of municipalities for clean ratables and need
for municipality to maintain a viable tax base

F. Relevant Documentation (list and attach if available any
reports, etc.): Letter of Mr. Russell.

G. Known Experts on Issue, if any: _____

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LOVELAND, GARRETT, RUSSELL & YOUNG

A PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

501 ASBURY AVENUE

BOX 510

OCEAN CITY, NEW JERSEY

08226-0510

ROBERT F. GARRETT, DE
RICHARD A. RUSSELL
DANIEL J. YOUNG
JOANNE MAZZA WEBER

(609) 398-0038
FRENCH B. LOVELAND
(1984-1978)
FAX (609) 398-8847

*ALSO MEMBER OF PA BAR

SENT BY TELECOPIER AND BY REGULAR MAIL

October 3, 1991

Terrence D. Moore
Executive Director
New Jersey Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Re: City of Estell Manor

Dear Mr. Moore and Members of the Pinelands Commission:

I am writing to you in my capacity as the City Solicitor for Estell Manor, Atlantic County. On October 4, 1991, you are considering the application of Estell Manor City to have Ordinance 91-2 certified. We understand that it is being recommended that the Ordinance be approved on the condition that another Ordinance referred to as No. 91-11 also be adopted and certified. The purpose of this letter is to explain why there has been a delay in the adoption of Ordinance No. 91-11 and to ask the Commission for consideration of the situation which Estell Manor City finds itself.

The proposed Ordinance No. 91-11 sets forth the formula for the allocation of Pinelands Development Credits within Estell Manor City. This is not a matter of concern to the governing body and the formula is acceptable. What is a matter of concern is the fact that these Development Credits will undoubtedly be used outside of the municipality.

Estell Manor City is a very unique community. It is the second or third largest municipality in land area in the State of New Jersey comprising some fifty-three (53) square miles. It is mostly undeveloped Pinelands forest. It has always been the goal of the governing body to preserve the rural character of this community. When the Pinelands legislation was first enacted and protests rose from virtually every other community in the

Atlantic County area, Estell Manor was the first to embrace and support the efforts of the Commission. This community has always been a staunch supporter of the goals set for preservation of the Pinelands area.

Unfortunately, the hard economic times that government has been experiencing has created new realities. We are forced to look at the fact that 51% of the land area in Estell Manor is either tax exempt (owned by the county and State) or under farmland assessment. We are forced to recognize that the City must be supported in the future by the taxes it receives on ratables from the remaining 49% of the municipality. Increased State regulation means that there is less money to provide basic municipal services. As an example, when Pinelands forced the closure of the landfill, the City had to hire an outside waste hauler for the first time in its history at a cost of an additional \$100,000 per year. This is a significant increase in a town with a total budget of only \$750,000. In addition to this, we face landfill closure costs of over \$1,000,000.00. At the same time, the local school board which operates the municipality's grammar school is struggling with ever increasing costs which raise local property taxes. Given these realities, the governing body is forced on a daily basis to look to the future for additional revenues.


At the present time, no new commercial development is permitted within Estell Manor and, to everyone's dismay, existing commercial operations are restricted from expanding. Residential housing is restricted to five, ten and twenty-five acre parcels. What residential development has taken place has turned out to be more expensive than the taxes brought in by the ratables due to increasing municipal and school costs.

So why, then, should Estell Manor be worried about taking a comparatively small final step towards Pinelands compliance? The reason is simple. By permitting and, indeed, encouraging the use of Development Credits outside the City, Pinelands will be taking away the future tax base of the municipality. With the great wealth of Development Credits lying in its undeveloped woodlands, Estell Manor will be a prime target for removal of Credits to aid in development of other areas. We have already observed the inflexibility of the Pinelands Commission in dealing with the expansion of existing commercial properties which may lead to the future loss of these ratables. If we are also robbed of residential development rights through the removal of Development Credits from the remaining land, the City may find itself virtually bankrupt in only a few years. We have already found that raising taxes is no answer since it only leads to the abandonment of properties which default to the City at tax sale. The number of properties which the City has acquired as a result of abandonment has been on the increase within the last few years.

For the above reasons, we urge the Pinelands Commission to consider restricting the transfer of Development Credits outside the municipality where they originate. If not controlled, rural municipalities such as Estell Manor may find themselves without funds to operate in the future. Speaking for my client, the governing body of Estell Manor has to find a way to manage the taxable 49% of the municipality which will provide the economic base to sustain future budgets.

We respectfully ask the Commission to take these comments under consideration. To summarize, Estell Manor City has cast its lot with the preservation of the Pinelands and the goals set by the Commission. We now urge the Commission not to turn its back on this municipality and to assist it in coping with the economic realities confronted as it tries to achieve these common environmental goals. We would be happy to sit down with the Commission to discuss any alternatives it may suggest for future development of our municipality.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard A. Russell", enclosed within a hand-drawn oval.

RICHARD A. RUSSELL

RAR:rs

cc: City Council, City of Estell Manor --
Sent by Telecopier and By Regular Mail

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION #

A. Proposer (agency, name, etc.): Great Egg Harbor Watershed
Association - Steve Eisenbauer
134 Old Tuckahoe Rd
Marmora, NJ 08223

B. Topic/Issue: Watershed boundary lines: Management
Plan should emphasize major watershed boundary
lines. NJDEP monitors water quality by dividing
the state into major watersheds (e.g. see
Water Quality Inventory Report published every 2 yrs).
The Plan should emphasize these natural dividing lines

C. Topic/Issue is/will be of importance: more than it currently
does
_____ immediately
_____ in the short term (next 5 to 7 years) or;
X _____ longer term (beyond 7 years)

D. Reasons for Importance:

- Some of the most important Pinelands problems are
water quality problems. A number of watersheds
involve water flowing from non-Pinelands to
(continue on back) Pinelands. Impact is often negative.
- Most people do not know where watershed boundaries
are in New Jersey or that water draining from
streets & lawns in non-Pinelands towns can pollute
(continue on back) streams running through the Pinelands.
- Pinelands boundary lines are ecological not political.
Watershed boundary lines are also ecological unlike
town, county, & state boundary lines
(continue on back) Both ecological boundary areas
represent bioregions. Watersheds are
the natural subdivisions of the
-over- Pinelands region.

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): Note map on page 2 & 3 of enclosed brochure.

G. Known Experts on Issue, if any: Many - Please call me if necessary

Example:

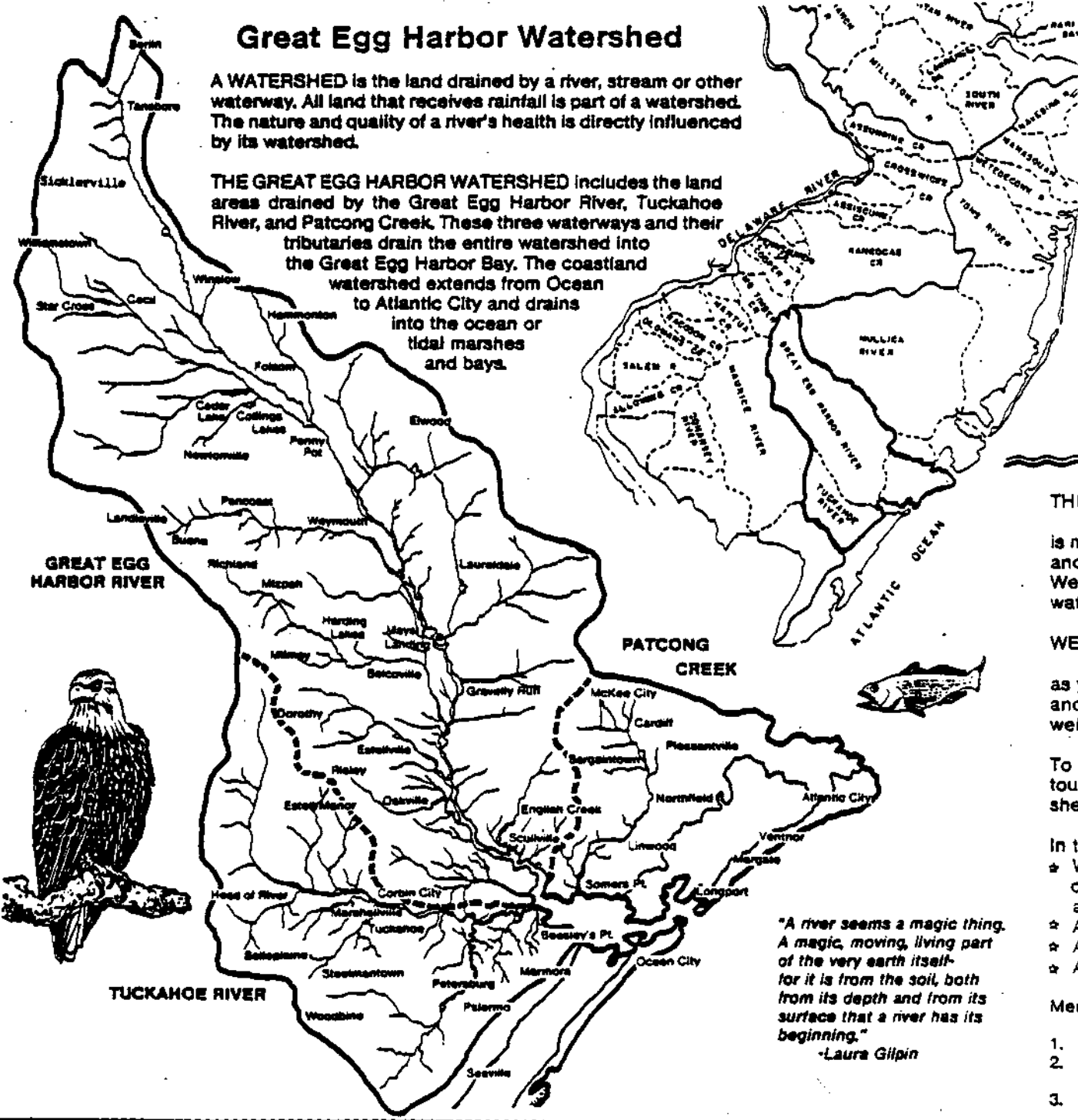
Headwaters of Great Egg Harbor watershed includes towns of Berlin, West Berlin & Lind Hill. The river is classified as polluted in its headwaters & then by natural remediation it improves to reasonably clean halfway (Waymouth) in its trip to the sea. "Swimmable" status is attained in Waymouth/Folsom area

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Great Egg Harbor Watershed

A WATERSHED is the land drained by a river, stream or other waterway. All land that receives rainfall is part of a watershed. The nature and quality of a river's health is directly influenced by its watershed.

THE GREAT EGG HARBOR WATERSHED includes the land areas drained by the Great Egg Harbor River, Tuckahoe River, and Patcong Creek. These three waterways and their tributaries drain the entire watershed into the Great Egg Harbor Bay. The coastal watershed extends from Ocean to Atlantic City and drains into the ocean or tidal marshes and bays.



GREAT EGG HARBOR RIVER

PATCONG CREEK

TUCKAHOE RIVER

"A river seems a magic thing. A magic, moving, living part of the very earth itself- for it is from the soil, both from its depth and from its surface that a river has its beginning."
 -Laura Gilpin

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Mark D. Morgan, Rutgers
University, Division of Pinelands Research

B. Topic/Issue: How is water quality changing in both disturbed
and undisturbed watersheds as a result of management
plan activities?

C. Topic/Issue is/will be of importance:

immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Is the plan working?
(continue on back)

2. Is the improvement (if any) worth it?
(continue on back)

3. Are there more effective management strategies?
(continue on back)

-over-

E. Related Issue(s), if any: Water Supply, Effect of water removal, Sludge disposal.

F. Relevant Documentation (list and attach if available any reports, etc.): Pinelands Commission Reports, Rutgers long-term monitoring

G. Known Experts on Issue, if any: Jean Ehrenfeld, Chris Uehlein, Art Johnson

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New Jersey Expressway Authority

"FARLEY SERVICE PLAZA"
P.O. BOX 351 - HAMMONTON, NJ 08037
PHONE 609-965-6060 • 609-348-3174 • FAX #609-965-7315

VINCENT L. LEONETTI
EXECUTIVE DIRECTOR



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November 26, 1991

Mr. Terrence D. Moore, Executive Director
THE PINELANDS COMMISSION
P. O. Box 7
New Lisbon, N.J. 08064

Dear Mr. Moore:

We have reviewed the topics listed in the Pinelands Plan. The NEW JERSEY EXPRESSWAY AUTHORITY has decided the most important critical policy that would have an impact on the Authority now and in the future would be Stormwater Management. Below we list our reasons.

TOPIC: Stormwater Management for Projects designed to enhance existing infrastructure.

TOPIC IS OF IMPORTANCE: Immediately

REASONING:

As you are aware, much of the public works infrastructure in the Northeast is outdated and in need of repair. Many of the highways are undersized and do not meet current AASHTO Standards for safety. This decade, much of our focus must shift from new construction to rehabilitation of the existing roads on the state and local level to meet the traffic demands imposed by the building boom of the 80's. The New Jersey Pinelands is no exception.

As many of the state and local roads are reconstructed our engineers, Remington & Vernick Engineers, are forced to increase the cartway size. Many of the rural roads they encounter are 18 feet wide, while the current minimum AASHTO Standard for a two-way road is 20 feet. To receive an NJDOT grant to improve any roadway, it must have a minimum travel lane of 11 ft. (22 ft. cartway).

New Jersey Expressway Authority

Mr. Terrence D. Moore
November 26, 1991.

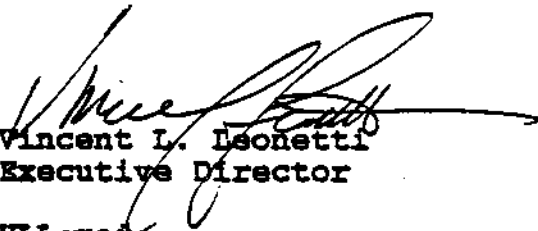
Page -2-

Current Pineland Regulations require them to recharge the stormwater flow from a 50 year design storm for all additional impervious surfaces. Environmental constraints common in the Pinelands (ie. shallow water tables, wetlands, flat topography) often limit the engineers ability to recharge effectively. Concerns also exist about potential groundwater contamination from recharged stormwater.

We recommend the Commission develop specific guidelines for rehabilitation projects. These guidelines should address the fact that rehabilitation projects must be undertaken in constraints. Most importantly, these guidelines should be cost effective to mitigate the high cost of infrastructure rehabilitation. Cost effective solutions to Regulatory Requirements will encourage compliance, and improve the public perception of the Commission and it's goals.

Thank you very much for giving us the opportunity to present our views.

Very truly yours,



Vincent L. Leonetti
Executive Director

VLL:mai

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): I WISH TO REMAIN
ANONYMOUS

B. Topic/Issue: PUBLIC PERCEPTION OF
THE PINELANDS COMMISSION

C. Topic/Issue is/will be of importance:

immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. SEE BACK

(continue on back)

2. _____

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

ONE OF THE BIGGEST PROBLEMS IS THE PERCEPTION OF THE PINELANDS ~~COM~~ COMM. BY THE PUBLIC IN GENERAL AND PEOPLE WHO DEAL WITH IT IN PARTICULAR YOU ARE VIEWED AS A SUPERCILIOUS BUREAUCRACY WHICH APPLIES A SET OF PRE-DETERMINED STANDARDS IN KNEE-JERK FASHION, EVEN WHEN IT DOES NOT MAKE SENSE. I AM SURE THIS IS DONE BECAUSE YOU FEEL YOUR CAUSE IS JUST AND POLITICALLY CORRECT. I THINK COMPLIANCE WITH YOUR GOALS WOULD BE MORE EASILY ACHIEVED IF YOU WEREN'T SO HIGH-HANDED ABOUT IT.

9/91
CP4B

C.W.Holsworth
1651 N. Valley Ave.
Vineland, N.J. 08360

Mr. Terrence D. Moore, Executive Director
N.J. Pinelands Commission
P.O. Box 7
New Lisbon, N.J. 08064

Sept. 17, 1991

Dear Mr. Moore:

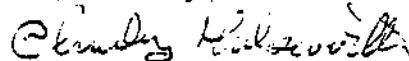
After the N.J. Pinelands Commission Meeting in Vineland on September 6 I spoke to you briefly about my involvement in Surface Mine Restoration and Reforestation (i.e. Resource Extraction) and my interest in some of the Commission's technical and scientific specifications. You suggested that I write to you about my interest in helping with upcoming standards revisions for mine reforestation.

I was encouraged by my meeting with Bob Zampella and Charles Horner March 7 when I explained some of my views and experience with this special kind of reforestation. Briefly, I have got good results by skipping a preliminary grass or herbaceous ground cover which later makes severe moisture and shade competition for newly planted tree seedlings. I have found that a wood chip mulch plus some related techniques give the same ground protection and eliminates some the erosion and fertilizer pollution problems which are especially important where a mining pond is involved.

Since about 1956 I have assisted South Jersey private surface mine and gravel pit owners with restoration-reforestation projects. Also I have had experience in mine restoration in Kentucky in the 50s and am a member of several national groups studying this kind of work. I would like to share my experiences with your technical and scientific groups when you draft changes in the Management Plan (Subchapter 6, 7:50-6.67) and Administrative Code.

I hope that when the Pinelands Commission meets again in Vineland we can have an even better turnout of local people so that they can better appreciate your good work.

Yours truly,



C.W. Holsworth MF SAF
Member Vineland Environmental Comm.

NOV 7 1991

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Richard Kane, Director of Conservation NEW JERSEY AUAUBON SOCIETY P.O. Box 693 BERNARDSVILLE, NJ 07924

B. Topic/Issue: CONTIGUOUS FOREST CONSERVATION

C. Topic/Issue is/will be of importance: immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

D. Reasons for Importance:

1. wildlife, especially forest songbirds, long-distance migrants. These species need interior forest to maintain numbers. (continue on back)

2. Connection of Southern Forest area to rest of Pinelands. This is critical to maintain a wildlife corridor between the regions. (continue on back)

3. Water quality is helped, as is air quality, by the conservation of contiguous forest. Since the pines are adjacent to three metro areas, this is a crucial issue. (continue on back)

-more-

-over-

4. There is no unitary state policy on statelands within the Pines with respect to forest management practices; hence the necessity for separate memoranda of agreement with various state agencies. A clear policy on contiguous forest on state lands would make it easier to deal with such issues as clear cutting, location of wood cuts, endangered species management, etc.

5. Development can be conformed to existing contiguous forest by design if it is thought about up front in the process

E. Related Issue(s), if any: Clear cutting, spraying,
location of wood and shelter cuts, wildlife management, both endangered
species and game, control of parasites like cowbirds, zoning, clustering,
silviculture, reforestation, to name a few. Another important issue
is native species vs. introduction e.g., loblolly.

F. Relevant Documentation (list and attach if available any reports, etc.):
There is an extensive literature on island biogeography and forest fragments
too much to list here.

attached are list of References.
Checked references are relevant.

G. Known Experts on Issue, if any:
various people at NY Botanical Garden (Mark McDonald)
Emile DeVito - NJ Conservation Foundation
Dr. Paul Kerlinger Cape May Bird Observatory (on migrant birds)

References

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- ✓ Askins, R. A. and M. J. Philbrick. 1987. Effect of changes in regional forest abundance on the decline and recovery of a forest bird community. Wilson Bull. 99:7-21.
- ~~Benzinger, J. et al. 1988. Breeding birds of the Pequannock Watershed. Records of NJ Birds. 14:22-27.~~
- ~~_____ and Robert Speiser. 1982. Breeding birds of New Jersey's Ramapo Mountains. Records of NJ Birds. 8: 24-25.~~
- ~~Bosakowski, T. and D.G. Smith. 1990. Great Blue Herons in the Pequannock Watershed. Records of NJ Birds 16: 38-39.~~
- ~~_____ et al. Forest Owl Populations of the Pequannock Watershed. Records of NJ Birds 15:2-8.~~
- ✓ Dunne, P., Ed. 1989. New Jersey at the crossroads of migration. New Jersey Audubon Society, Franklin Lakes, NJ.
- ~~Harrison, D. 1986. Breeding birds of the Black River, 1979-85. Records of NJ Birds 12: 2-6.~~
- ✓ Hill, N.P. and J. M. Hagan, III. 1991. Population trends of some northeastern North American landbirds: a half-century of data, Wilson Bull. 103:165-182.
- ~~Kane, R. 1978. Nesting birds of the spruce plantings in the Pequannock Watershed. New Jersey Nature News 88:122-132.~~
- ~~_____. 1987. Pequannock Watershed birdlife. Newark Watershed Symposium. Unpublished.~~
- ✓ Leck, C.F. 1982. Declines in some forest birds over 20 years. Records of NJ Birds 8:5.
- ✓ Serrao, J. 1985. Decline of forest songbirds. Records of NJ Birds 11:5-9.
- ✓ Terborgh, J. 1989. Where have all the birds gone? Princeton, NJ.



November 4, 1991

Mr. Terrence D. Moore, Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Re: Review of the Pinelands Comprehensive Management Plan

Dear Mr. Moore:

The NJBA is in receipt of your memo of October 1, 1991. To facilitate the review of the CMP, you asked that the Pinelands issues be identified by broad topic, and you enclosed a form which we could use at our option.

In March 1990, we provided comments to the Public Participation Committee on issues we believe the Pinelands Commission should address. At that time we grouped our primary issues of concern into five topics as follows: 1) process, 2) growth area policies, 3) the PDC program, 4) standards generally, and 5) public participation.

We find that these five topics remain relevant. We do not believe that any great benefit would derive from reformatting them onto the form provided. We enclose a copy of our March 27, 1990, letter as our identification of issues which need to be addressed in your review of the CMP.

Sincerely,

Robert H. Karen
President

Enclosure

1991 STATE OFFICERS
ROBERT H. KAREN
President

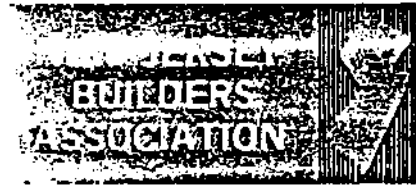
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March 27, 1990

Ms. Anne Auerbach
Chairman, Public Participation Committee
The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Dear Ms. Auerbach:

Thank you for presenting the New Jersey Builders Association and its affiliated locals with the opportunity to identify issues which we believe are important for the Pinelands Commission to address and to suggest ways in which the Commission might address these issues. We have separated our concerns into five categories as follows: 1) process, 2) growth area policies, 3) the Pinelands Development Credit Program, 4) standards generally, and 5) public participation.

These concerns and suggestions were identified by an ad hoc committee of builder and consultant members experienced with the Pinelands Comprehensive Management Plan (CMP).

PROCESS

Standards and guidelines should be developed for the preparation of threatened and endangered species reports.

For an application completeness review, Commission staff should only have one opportunity to identify and request missing material. Submission of requested material by the applicant should not present the Commission staff with an additional opportunity to request information not requested in the initial letter of incompleteness.

Issuance of a Certificate of Filing is being used as development approval. The Certificate of Filing is designed as an administrative document establishing that the required material has been filed. Should the Commission's staff believe the proposed development to be contrary to Pinelands policy, a substantive letter of inconsistency can be issued. At the applicant's option, the application should be allowed to proceed through the local approval process. The Pinelands Commission would have every opportunity to participate in the hearings before the local board. Further, the Pinelands Commission has call up authority for local approvals which it believes are inconsistent with the Comprehensive Management Plan.

1990 STATE OFFICERS
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Vice President-Treasurer
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March 27, 1990
Page Two

The Pinelands should not review each application for issuance of a building permit in developments which have been subject to subdivision and/or site plan review. This is a primary example of unnecessary and redundant regulation which is increasing the cost of housing. This building permit review should be limited for use on scattered lots which have not been subject to planning board or zoning board review.

We suggest that the Pinelands Commission discontinue its review of county planning board and county soil conservation district applications which are subject to local planning board or zoning board review. Again this is unnecessary redundant review.

There is a reluctance of Pinelands staff to revise existing site conditions. Revisions could be incorporated into development design that would greatly improve existing conditions. Apparently this is a reaction to the complexity of the Pinelands process. More flexible ways to accommodate waivers of standards which will result in overall improvements of existing problems should be encouraged.

Developers are experiencing a difference of opinion between Pinelands staff and municipal staff regarding permitted uses under the zoning ordinance. Interpretation of the zoning ordinance should be a municipal determination.

GROWTH AREAS

The Pinelands Commission should undertake an analysis of the number of dwelling units actually built in each designated plan "area." Further, the current development potential of each area should be determined as compared to projections prepared when the CMP and local plans evolved. It is our opinion that some growth areas have experienced significant down-zonings where certain areas (i.e., wetlands and buffer areas) have been removed from density calculations although these areas had initially been included when gross development potentials for these areas were calculated. It is our belief that growth areas have been developing significantly below their design potential. This situation seems to be most pronounced in certified municipalities which have been given more flexibility in assigning densities which may not meet the overall growth goals of the plan. Based on analysis as outlined above, it may be necessary to increase densities on the developable portions of regional growth area land and to increase the development potential of rural development areas.

Design standards in growth areas should be reasonably structured to accommodate the projected growth and reflect the already established characteristics of an area. Examples of requirements which detract from established community

March 27, 1990
Page Three

character are requirements for total on site retention of storm water and their resulting drainage structures in urbanized village areas and the use of vegetation indigenous to the Pinelands when this vegetation will probably not survive under developed site conditions and is out of character with the landscaping patterns of the area as it has evolved.

Sewer effluent standards of two parts per million nitrogen are an unrealistic standard for growth areas. Different standards need to be established for those areas which have been designated to accommodate our "human environment" versus areas set aside for preservation of our "natural environment." More reasonable standards must be adopted to accommodate the densities and projected growth of these areas set aside for human occupation.

Establishment of densities of less than three dwelling units per acre for growth areas is extremely wasteful of resources needed to construct and install infrastructure and of the land necessary for development. Existing policies actually promote a sprawl development pattern throughout the Pinelands growth areas.

Why, for example, do certain regional growth area municipalities have maximum average densities of only one dwelling unit per acre? This is a "growth area"? To the contrary, development at this intensity does not "really" constitute a regional growth area, nor does it promote affordable housing opportunities. In fact, we would conclude that such limited regional growth area zoning is in direct conflict with the CMP's housing policy, in particular NJAC 7:50-6.132(a)5 which is to "ensure that (affordable) dwelling units required by (the Commission's policy) be available at approximately the same rate as is non-required housing". We would maintain that one acre density is far from promoting affordable housing opportunities.

Expansion of existing sewer systems operating at reduced standards should be permitted to accommodate growth in growth areas and to serve existing neighborhoods which have many substandard septic systems. Elimination of many of these substandard septic systems would have benefits to the environment far exceeding the costs to the environment for sewer plants operating at levels exceeding two parts per million nitrogen.

PINELANDS DEVELOPMENT CREDIT (PDC) PROGRAM

It is strongly suggested that the Pinelands Development Credit Program be discontinued. Despite statistical manipulations which are employed to put a favorable "spin" on the PDC Program, it is not viable and it is not working voluntarily at an acceptable level. As a result there have been subsequent revisions to the rules to make the program mandatory when use variances are utilized. Since the underlying premise of the Comprehensive Management Plan is that it is an environmental plan, development of the growth areas should be permitted at the higher PDC densities by right.

In addition, efforts to utilize the PDC Program run into a variety of obstacles. Due to the design constraints on most sites, it is not feasible to utilize PDC's. In fact, Pinelands analysis shows that most sites are developed at less than by right densities. Also, letters of interpretation allocating PDC's are so restrictive that there is no financial incentive to land owners to sell and permanently restrict the use of their land. For example, if the Commission is truly in support of a viable PDC program, it should strive to maximize the PDC allocation by minimizing the estimates of wetlands acreage on properties. Higher PDC allocations would potentially provide greater compensation and serve to encourage more transfers.

Lastly, the PDC bonus increase in density received when purchasing credits (of 50 percent) is far too low to act as an incentive to purchase PDC's, and should be increased two or three-fold. This would require a total revamping of the PDC program. Without such drastic changes, the program should be discontinued, since it is neither compensating landowners nor providing improved development opportunities.

STANDARDS, GENERAL COMMENT

Under Pinelands interpretations there is no such thing as an isolated wetlands. All wetlands are contiguous. Some wetlands areas are of such small area (i.e., 50 square feet) that they are negligible. The policy should be changed to identify such small areas as isolated wetlands not of significant value. As such they should not require buffers and under certain circumstances should be allowed to be disturbed with mitigation elsewhere.

The requirement for two feet of free board between septic systems and groundwater causes continuous difficulty. There is apparently no accepted methodology to evaluate and determine seasonal high water table. Ways to reach agreement on this issue should be explored.

Fire hazard classification should be based on vegetation, soil type and hydrology, not just on vegetation. Further, the requirement for 200 feet of underbrush clearance when city water and fire hydrants are available is unnecessary.

Developers are being asked to route residential roof runoff into storm water systems. In addition they are being asked to oversize basins for residential stone driveways in the event that future property owners pave the driveways, even though the drives don't flow into the storm water system. What are the level of contaminants in roof runoff that should necessitate this type of design? These are also additional examples of extreme unnecessary regulation. These retention basin policies are examples of policies which are thwarting the comprehensive management plan's goals. They require increasing the size of detention basins at tremendous loss of trees and natural vegetation.

It is suggested that basins be permitted in buffer areas. If there is concern that a certain distance is necessary to filter the outflow, a sufficient discharge swale length can be accommodated by careful design of the basins.

The landscaping requirements should permit species that are similar, but not necessary native to the pinelands, especially grasses and evergreens. This would accomplish the same goal, but would give flexibility that would provide more diversified and attractive landscaping. The use of the similar species would not detract from maintaining or preserving the natural appearance of the pinelands. Flexibility would prove especially helpful in the area of grasses, which would be more tolerant to human activity than the native species.

The Pinelands should consider permitting buffer averaging similar to the New Jersey DEP. This could provide more flexibility in design without adversely affecting the environment.

Stone driveways should be permitted to cross development buffers, providing disturbance is kept to a minimum.

Portions of the septic systems, such as septic tanks and pump chambers, should be permitted beyond the septic buffers, with the disposal field being the only portion located 300 feet from wetlands. Since the septic field is the only portion of the system that discharges effluent into the ground, it would be more practical to locate the tank pump chamber closer to the building. This could eliminate a potential source of problems due to flowing an unnecessary distance from the dwelling before entering the septic tank and pump chamber.

When proper drainage provisions have been made, the Pinelands should allow paved drives at parking areas.

PUBLIC PARTICIPATION


The Pinelands Commission is viewed as a "closed shop." We see no way to increase the level of public participation with the Pinelands Commission until this image as a closed shop is changed. The Pinelands Commission and staff would have to be open to suggestions and be willing to accept changes proposed by those other than Pinelands staff and consultants. The February 15, 1990, adoption of amendments to the CMP without any changes in response to the commenters suggestions is only the most recent example of a case to point. In 1987 the NJBA made suggestions for more than 20 changes in CMP policies as part of the three year review process, but none were accepted.

March 27, 1990
Page Six

We hope that the issues and concerns outlined above and the suggested changes in process and policy will result in an interactive process which will promote better utilization of the growth areas of the Pinelands.

Please direct any comments and questions on these concerns and suggestions to Joanne Harkins, AICP/PP, Director of Land Use and Planning for the New Jersey Builders Association.

Sincerely,



Wayne L. Karnell
President

WK:JH:kp
lbrjh12

DEC 9 1991

ATLANTIC COUNTY



RICHARD E. SQUIRES
COUNTY EXECUTIVE

DEPARTMENT OF REGIONAL PLANNING & DEVELOPMENT

1333 ATLANTIC AVENUE
ATLANTIC CITY, N.J. 08401
(609) 345-6700
(FAX 343-2202)
(TTY 348-5554)

AVA J. GOLDMAN
DEPARTMENT HEAD

December 5, 1991

Terrance D. Moore,
Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Dear Director Moore:

Enclosed are six major topics that we recommend the Pinelands Commission consider during their comprehensive review of the Pinelands Plan.

Please feel free to contact our office if you would like to discuss these or other aspects of your plan review.

Sincerely,

Timothy G. Chelius, P.P.
Director of Planning

TGC:kcw

encl:

cc: Ava Goldman, DH, RP&D
Robert Brewer, Supervising Planner



PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): Atlantic County Division
of Planning

B. Topic/Issue: Pineland Development Credits - how to
increase their use

C. Topic/Issue is/will be of importance:

- immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. More use of PDC's from existing supply is needed
to demonstrate value of PDC's in addressing land
equity issues
(continue on back)

2. _____

(continue on back)

3. _____

(continue on back)

-over-

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2

A. Proposer (agency, name, etc.): Atlantic County Division
of Planning

B. Topic/Issue: Water Supply - how much Pinelands water
can be used

C. Topic/Issue is/will be of importance:

X immediately
X in the short term (next 5 to 7 years) or;
X longer term (beyond 7 years)

D. Reasons for Importance:

1. Water demands from regional growth areas, Pinelands
Towns and surrounding areas are increasing.

(continue on back)

2. Water withdrawals can have a negative environmental
impact.

(continue on back)

3. _____

(continue on back)

-over-

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 3

A. Proposer (agency, name, etc.): Atlantic County Division
of Planning

B. Topic/Issue: Air Quality

C. Topic/Issue is/will be of importance:

- immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Federal Clean Air Act standards must be met statewide

(continue on back)

2. Sanctions may be imposed on local governments and/or
employers for non-compliance

(continue on back)

3. _____

(continue on back)

-over-

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 4

A. Proposer (agency, name, etc.): Atlantic County Division
of Planning

B. Topic/Issue: Pinelands Infrastructure

C. Topic/Issue is/will be of importance:
X immediately
X in the short term (next 5 to 7 years) or;
X longer term (beyond 7 years)

D. Reasons for Importance:
1. Strict environmental standards must be met.

(continue on back)
2. Wastewater treatment and waste disposal are expensive

(continue on back)
3. _____

(continue on back)

-over-

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 5

- A. Proposer (agency, name, etc.): Atlantic County Division
of Planning

- B. Topic/Issue: State Plan - what is Pinelands relation
to State Plan

- C. Topic/Issue is/will be of importance:
 immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance
1. The State Plan affects the surrounding non-Pinelands
area

(continue on back)
2. There should be coordination between State Plan
and Pinelands Plan

(continue on back)
3. _____

(continue on back)

-over-

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 6

A. Proposer (agency, name, etc.): Atlantic County Division of
Planning

B. Topic/Issue: Stormwater Management

C. Topic/Issue is/will be of importance:
 immediately
 X in the short term (next 5 to 7 years) or;
 X longer term (beyond 7 years)

D. Reasons for Importance:

1. Stormwater management affects environmental quality
and ground water recharge

(continue on back)

2. The performance of stormwater management may decline
over time

(continue on back)

3. _____

(continue on back)

-over-

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PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Richard W. Bentz NJ Bureau of Forest Management

B. Topic/Issue: The Pinelands area needs a single forest management strategy which defines best management practices, annual limits for permanent forest loss (development, road building, etc.), annual limits for forest renewal, criteria for reforestation and afforestation, forest protection (insect, disease and fire) limits and methods, acceptable practices, also salvage

C. Topic/Issue is/will be of importance:

- X immediately
X in the short term (next 5 to 7 years) or;
X longer term (beyond 7 years)

D. Reasons for Importance:

- 1. Rather than policies for individual components (rare plants, animals, game species) a plan would produce a more holistic approach to ecosystem management. (continue on back)
2. Would give a basis to assess permit applications and the impact of forest practice measured against total strategy. (continue on back)
3. Would aid permittee or other parties involved in understanding what is needed for an application and activities. Municipalities could administer farmland tax laws better (continue on back)

-over-

Continued:

- B. strategies. It should also include strategies for other integral portions of the resources.

E. **Related Issue(s), if any:** Impacts, both positive and negative on all facets of ecosystem. Acceptable management practices and alternatives better direction for research development.

F. **Relevant Documentation (list and attach if available any reports, etc.):** _____

G. **Known Experts on Issue, if any:** NJ Bureau of Forest Management with assistance by US Forest Service and Society of American Forester accredited college or university faculty members.

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IN REPLY PLEASE REFER TO

State of New Jersey
DEPARTMENT OF TRANSPORTATION

THOMAS M. DOWNS
COMMISSIONER

1035 PARKWAY AVENUE
CN 600
TRENTON, NEW JERSEY 08625

December 6, 1991

Mr. Terrence Moore
Executive Director
Pinelands Commission
PO Box 7
New Lisbon, NJ 08064

Dear Mr. Moore:

Thank you for giving us the opportunity to identify important issues relative to the comprehensive review and update of the Pinelands Plan. Enclosed are six topics in the format suggested in your October 1, 1991 letter. Since they are rather diverse and involve several units in our Department, I suggest that you contact Andy Fekete at 530-2824 to initiate discussions on these topics. He will ensure that appropriate people from DOT are involved.

Sincerely,


Christine M. Johnson
Assistant Commissioner
Policy and Planning

Enclosures

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): South Jersey Transportation Authority

B. Topic/Issue: Atlantic City International Airport Master Planning/Preliminary Engineering/Environmental Evaluation

C. Topic/Issue is/will be of importance: immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

D. Reasons for Importance: 1. A two year effort will begin in early 1992 to identify a 20 year development program... (continue on back) 2. (continue on back) 3. (continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): Request for proposals from consultants currently being developed. No documentation available at this time.

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2

A. Proposer (agency, name, etc.): NJ Department of Transportation

B. Topic/Issue: Coordination with the State Development & Redevelopment Plan - The Interim State Development & Redevelopment Plan has recognized the New Jersey Pinelands as an "area of critical state concern". The Plan declares its acknowledgement of statutory treatment of the New Jersey Pinelands under the Pinelands Protection Act and its reliance upon the
(continued on back)

C. Topic/Issue is/will be of importance:

_____ immediately
X _____ in the short term (next 5 to 7 years) or;
_____ longer term (beyond 7 years)

D. Reasons for Importance:

1. There needs to be consistency and integration of interagency planning.

(continue on back)

2. _____

(continue on back)

3. _____

(continue on back)

-over-

A. (cont'd.)

plans and regulations of the New Jersey Pinelands Commission to fulfill the objectives of the State Development & Redevelopment Plan. Therefore, we recommend that the Pinelands Comprehensive Management Plan similarly incorporate language stating its intent to carry out the objectives of the State Development & Redevelopment Plan.

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: Bob Kraml - NJDOT

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 3

- A. Proposer (agency, name, etc.): NJ Department of Transportation

- B. Topic/Issue: Air Quality - Part IX of the Pinelands Comprehensive Management Plan should be revised and updated to provide for implementation of the 1990 Clean Air Act Amendments and any applicable state legislation concerning air quality. It should be noted that the New Jersey Pinelands encompasses portions of the Severe 1, Severe 2, and Moderate ozone non-attainment areas.
- C. Topic/Issue is/will be of importance:
X immediately
X in the short term (next 5 to 7 years) or;
_____ longer term (beyond 7 years)
- D. Reasons for Importance:
1. There is a requirement under the new Clean Air Act to achieve statewide conformity with the Clean Air Standards.

(continue on back)
 2. _____

(continue on back)
 3. _____

(continue on back)

-over-

E. Related Issue(s), if any: State Development and Redevelopment Plan

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: John Elston - DEPE & Bob Kraml - NJDOT

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 4

- A. Proposer (agency, name, etc.): NJ Department of Transportation

- B. Topic/Issue: Use of treated sewage sludge as landscape material on transportation projects.

- C. Topic/Issue is/will be of importance:
X immediately
X in the short term (next 5 to 7 years) or;
_____ longer term (beyond 7 years)
- D. Reasons for Importance:
1. Treated sludge has been approved by DEP as acceptable material for soil additive on DOT projects. It represents an inexpensive source of organic material for successful plant growth/maintenance.
(continue on back)
 2. Ban of ocean dumping of sludge requires creative & environmentally benign disposal methods. This is a reasonable disposal/reuse mechanism.
(continue on back)
 3. _____

(continue on back)

-over-

E. Related Issue(s), if any: Reuse of soil contaminated with
petroleum hydrocarbons on transportation projects.

F. Relevant Documentation (list and attach if available any
reports, etc.): _____

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 5

- A. Proposer (agency, name, etc.): NJ Department of Transportation

- B. Topic/Issue: Reuse of soil contaminated with petroleum hydrocarbons
in transportation project construction.

- C. Topic/Issue is/will be of importance:
X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. DEPE has allowed this in other parts of the state. Cost savings
can be significant without compromising environmental protection.

(continue on back)
2. _____

(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: Treated sewage sludge application
as landscape material on transportation projects.

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 6

- A. Proposer (agency, name, etc.): NJ Department of Transportation

- B. Topic/Issue: DOT maintenance facilities located in Pinelands.
Management plan should provide flexibility for expanding and constructing
new DOT maintenance facilities.

- C. Topic/Issue is/will be of importance:
X immediately
X in the short term (next 5 to 7 years) or;
X longer term (beyond 7 years)
- D. Reasons for Importance:
1. DOT has a need to maintain, update and occasionally build new
maintenance facilities that service state roads in the Pinelands.

(continue on back)
2. _____

(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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**PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN**

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

- A. Proposer (agency, name, etc.): Alan W. Emmons
4 Wenatchi, Browns Mills, NJ 08015
609-893-6350
- B. Topic/Issue: Forestry/ In the CMP for the New Jersey Pinelands
it states that forestry will be an encouraged activity. Under the
current policies now being implemented by the Pinelands Commission
Staff, forestry in New Jersey has been repressed and is a dying
cultural entity.
- C. Topic/Issue is/will be of importance:
 X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. The South Jersey forests and their resources have been the
backbone of local economies since the days of the colonists.
Forestry provides an income to landowners and their families
(continue on back)
 2. The management of our natural renewable resources within the
Pinelands is important if we want to maintain the stature of
the Pinelands. The Pinelands are a man-made entity; without
(continue on back)
 3. Forestry creates a variety of habitats which results in a
healthy, biologically diversified forest ecosystem.
(continue on back)

-over-

CONTINUED:

- D. 1. and at the same time forest properties are managed in a responsible way.

- D. 2. disturbance or man's influence, the Pinelands as we know it will cease to exist.

- E. Related Issue(s), if any: Harvesting of trees (clearcutting), regeneration, herbicide application (silvicultural methods), species diversity, traditional Pinelands lifestyles, the encouragement of rare and endangered species (Loblolly Pine and White Pine).
- F. Relevant Documentation (list and attach if available any reports, etc.): Sections of CMP, Audubon Society Nature Guides Eastern Forests (Elbert Little Jr.), page 357-358; Ortho Books All About Trees, page 95; Common Trees of N.J. by Joseph S. Illick; 1899 State Geologist Report on Forests - Loblolly Pine, page 237, White Pine, page 185 and 247; and many other books and records.*
- G. Known Experts on Issue, if any: Elbert Little Jr. (Trees); Joseph S. Illick (Trees); Richard Iverson (Pesticides); Dave Marquis (Silviculturalists); L. C. Vermeule (Botanist); John Benton (NJ Forester); Paul Schairer (Schairer's Sawmill).

**** Additional documentation can be furnished upon request.

DEC 9 1991

Pinelands Commission Notation:

Supplemental material (p.95, Ortho books; portions of the CMP) is on file at the Commission and available for review.

9/91
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DEC 1 1991



New Jersey Concrete and Aggregate Association

770 River Road • West Trenton • New Jersey 08628

(609) 771-0099

FAX (609) 771-1729

December 10, 1991

William J. Cleary
Executive Director

Mr. Terrence D. Moore
Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, N.J. 08064

Dear Mr. Moore:

The NJCAA represents the ready mix concrete and surface mining interests throughout New Jersey. Many of our members maintain facilities in the Pinelands region and of course are interested in any changes you are considering in the Pinelands Comprehensive Management Plan (CMP). The CMP in the past has consistently referred to the importance of the mining industry to this region.

NJCAA, through our Pinelands Resource Extraction Advisory Committee (PREAC), has been meeting over the past year with Mr. Charles Horner and Ms. Karen Young of your staff. We appreciate their cooperation and suggestions. In addition, we would like the Commission and staff to be aware of our concerns.

The mining industry in New Jersey dates back to the Revolutionary War and has continued to this day. It is estimated that in 1988 the non-fuel mineral production for the state was \$226 million. Employment in the industry directly is around 2400 people with related industries who depend on our products averaged at about 165,000 people.

Construction sand and gravel was the State's second leading mineral commodity produced, accounting for 27% of the State's mineral value. Construction sand and gravel was produced by approximately 60 companies in 15 of the State's 21 counties. Leading counties in order of output were Ocean, Camden, Cumberland, Cape May, and Morris with a heavy concentration occurring in the pinelands region.

Major uses were for concrete aggregates, asphaltic concrete aggregates, fill, and roadbase and coverings.

Nationally, New Jersey ranked ninth in industrial sand production in 1989. Industrial sand production in New Jersey also accounted for more than two-thirds of the Northeast region's production, which included the six New England States, New York, Pennsylvania, and New Jersey. In 1989, a total of 7 companies operated 18 pits in 6 counties and produced 1.8 million short tons valued at \$26 million. Cumberland County, where most of the operations were located, was the largest source of glass, foundry, and blast sand in the Northeast region of the United States.

Members of the NJCAA extract sand, gravel and crushed stone, for use in construction and industrial products. While the overwhelming majority of "aggregates" are used for construction purposes, there are other significant uses, including those for water filtration and other means of pollution control. These minerals can only be extracted from deposits where they are found in nature. Since transportation costs double the cost of the product approximately every 20 miles from ultimate use, economic imperatives dictate excavation or mining in close proximity to the site of use. In the case of sand and gravel, which are unconsolidated rock materials, close to 50% of all commercially viable deposits are in the alluvium or floodplain, and under current definitions, are located in "wetland" areas.

Excavation of aggregate materials often leads to the creation of water bodies where none existed before, and reclamation activities can be designed to enhance and restore wetlands. Many operations are "wet process" and include excavation below the water table.

The two basic extraction methods are open pit excavation or quarrying, and dredging. Open pit excavation and processing has four major steps: (1) site clearing --- removing trees and vegetation and stripping overburden and topsoil, and transporting, redepositing, or stockpiling it at or off the site; (2) mining --- removing the material from the deposit; (3) processing --- crushing, screening, sizing, washing, blending, and stockpiling the mined material to conform to standards and specifications; and (4) reclamation of the extraction area.

Dredging usually involves mounting the equipment on boats or barges. Suction or bucket-type dredges are used most commonly to harvest sand and gravel from the bottom of a body of water. The material is processed either on board or transported to land for processing.

In terms of beneficial functions and values, wetlands areas created by mining can: (1) provide habitat for many species of fish and wildlife; (2) reduce flooding problems by temporarily storing large quantities of water, and by curbing the velocity of flood water; (3) help to maintain water quality by filtering out pollutants and sediments; (4) control erosion by trapping soil washed from nearby farmland; (5) are a source of recreation; and (6) are a source of timber and other natural products for commercial use.

The NJCAA agrees that especially important wetland resources must be preserved and its industry members are prepared to play a unique role as creators and restorers of new and degraded wetlands as part of its normal activities associated with the extraction of aggregates and subsequent land reclamation. In order to do this in a manner that protects and enhances wetland functions and values without undue economic impact devoid of environmental benefit, the NJCAA is preparing to present its views over proper wetlands activities to the Commission at its convenience.

Many of our members own and operate their facilities in Southern New Jersey and are regulated by the Pinelands Commission. With the time nearing for review of the Comprehensive Management Plan, we as an association would like to address the committee and make a full presentation on the following suggested changes to the C.M.P.;

1. General Permitting:

A. Certificate of Filing Duration

Presently our industry is required to renew its Pinelands approval every two years. Due to the expense involved, complexity of the filing, and the redundant review by municipalities, we are requesting a five-year permit.

B. No Call Up Approval

Pursuant to the above request, the renewal date should be consistent with the "No Call Up Letter Date."

C. 20 Acres Development Calls

Request that current approval of 20 acres per site of extraction be increased to up to 100 acres per site of extraction at the option of the extractor. This change is being requested due to the fact than many different types of sand may be located (and in demand) on a particular site.

D. Plan Review Period

Request that the present review response time by the Pineland's staff members be shortened to 15 days down from 30 days on renewal applications, however, 30 day review period should continue for new applications.

E. Depth Of Excavation

Present language of depth of excavation be changed from 65 feet from existing ground surface to 65 feet below the water table.

F. Sloping

New language regarding slope of excavation below the waters edge as follows. "All resource extraction facilities that remove minerals below the surface water level will be required to maintain a slope of not more than 3 feet horizontal for every 1 foot of vertical up to a depth of 7 feet below the surface of the water. Beyond that water depth the excavation will be allowed to stay in its post excavation slope."

2. Reclamation

- A. Vegetation required for reclamation is limited to a very restrictive listing of species which does not represent the existing natural

vegetative diversity of the Pinelands. We request that this list be expanded to reflect the vegetative diversity of the Pinelands by using a comprehensive listing of native Pinelands species such as appears in the Pinelands Delineation Manual.

3. Wetlands

A. Mitigation

Institute a plan for mitigation as per federal regulations.

B. Wetlands Definition

Adopt the definition of wetlands that would make the pinelands consistent with Federal and State definitions.

C. Buffer Relief

Allow buffer relief as per N.J.D.E.P.E. Freshwater Wetlands Protection Act. This will make Pinelands regulations consistent with the rest of the state.

D. Wetlands & Buffer Permit

Provide mechanism that allows permitting of development within buffers and wetlands consistent with State and Federal guidelines.

We would appreciate your review of our industry's requests, and the opportunity to make a fully documented presentation to the committee to factually support these requests.

Sincerely,

William J. Cleary

William J. Cleary, CAE
Executive Director

WJC:pvh

REGULAR MEETINGS
FIRST THURSDAY
EACH MONTH
7:30 P. M. PREVAILING TIME

086011 08001

FILE COPY
Lower Bank, Box 344K
RD2 Egg Harbor City, NJ 08215

WASHINGTON TOWNSHIP

(BURLINGTON COUNTY)

MARGUERITE KEATING
MUNICIPAL CLERK

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

LOWER BANK, N. J. December 10, 1991

Mr. Terrence Moore
Pinelands Commission
P.O. Box 7
New Lisbon NJ 08064
Attn: Ms. Lois Cristarella

Re: Review of the Pinelands Comprehensive Management Plan

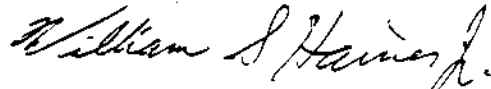
Dear Director Moore:

Enclosed are three recommendations for critical topics pertaining to the review of the Pinelands Comprehensive Management Plan. As Washington Township is situated within the geographic core of the Preservation area, and contains probably the greatest extent of publicly-owned land within the State of New Jersey, both our local government and our residents are keenly aware of the impact of the Plan and of the inequities which must be addressed. I trust that the enclosed input will be included in the review, and that the determination of major topics will not be limited numerically to "5 or so" - but rather reflect the issues which require attention.

I request that a copy of the compilation of all recommended topics, be forwarded directly to our Township. This would allow it to be readily available for public review within our municipality.

Thank you for this opportunity to input into the review process, and I will look forward to continued participation throughout the program.

Very truly,



William S. Haines, Jr.
Mayor

Enclosures (3)

cc: Burl. Co. Planning Board

Recommendation # 1

A. Township of Washington, Burlington County

Green Bank, RR 2 Egg Harbor City NJ 08215

B. Adverse economic and cultural impacts of the Pinelands CMP, its administration, and related State programs upon community viability and residents within the Preservation area.

C. Topic is IMMEDIATELY important.

D.1. Preservation regulations as applied to privately-owned open space, severely restrict land use and reduce real-property value.

2. Reduced value and utility cause private owners to sell PDC's, or sell property to the State Green Acres program.

3. Municipal tax base is reduced by the diminished realty value and removal of State lands from the tax rolls.

4. Economic burden is placed upon the residents of the Pinelands communities, to make up the lost municipal revenues from open space that previously generated tax income with negligible demand upon municipal services.

5. In communities within the core of the Preservation area, the extent of existing tax-exempt State land and continuing acquisitions, place a financial burden upon Pinelands homeowners, because the municipalities have limited alternate sources of tax revenues, either from commercial-industrial properties or from prospective new development.

6. Green Acres acquisitions, as endorsed by the Pinelands CMP, are conducted without regard to the relevant extent of existing State land within the municipality, the existing and continuing aggregate fiscal impacts, Parks acquisition plans, or the need for further acquisition of lands that are already regulated for Preservation.

7. Green Acres acquisitions are conducted without regard to Pinelands Village zoning, as approved by the Commission per the Pinelands CMP requirements for municipalities. Village purchases further fragment existing communities and remove land with development potential from tax rolls.

8. The State's in-lieu-of tax payment program, which does not apply to all Park lands, has not been updated since 1906 and is inadequate.

9. Acquisition of lands with existing realty improvements, such as houses and farmsteads, causes the loss of both the land and improvement ratables. Due to the inability of the State to maintain such property, structural improvements either will be demolished or permitted to fall into disrepair and eventual abandonment.

10. The transfer of PDC's out of Preservation communities, reduces real property value, and ultimately may result in fee-simple sale to Green Acres at the reduced valuation. No compensation program exists for the communities losing the PDC's, and the resultant lost valuation and revenues.

11. Communities in the core of the Preservation area with extensive State holdings of 80% or more, have no capability to absorb such impacts without direct and adverse economic effects upon the Pinelands residents.

E. No related issues.

F. Washington Township tax-bill samples: pre/post Wharton purchase:

1955/1956 - pre-acquisition rate \$8.76

1956/1957 - post-acquisition rate \$17.36

G. Mayor William Haines, Jr.

Block or Section	Lot or Plat Number	ACRES	PAGE	LINE	LAND	BUILDINGS	PERSONAL	DEDUCTIONS	NET VALUATION TAXABLE
62	63	4.25	45	1	2425 -	450 -	50 -		29.25 -
66	63								
66	64								
66	65								
66	69								
66	64								
66	12								
66	13								
66	14								
66	17								
66	25								
66	28								
66	29								
66	30								

NOTE: Interest at the rate of 6% will be charged on all delinquent taxes.	TOTAL TAX 1956	1ST QUARTERLY INST. DUE AUG. 1, 1956	2ND QUARTERLY INST. DUE NOV. 1, 1956	3RD QUARTERLY INST. DUE FEB. 1, 1957	4TH QUARTERLY INST. DUE MAY 1, 1957
LESS PRELIMINARY BILL (1/2 1956 TAX)	\$507.78	\$195.85	\$195.86	\$126.94	\$126.95
	116.07				
FINAL BILL 1956	\$391.71				

1956 RATE PER \$100.00	NAME <i>Howard Mc Innes</i>	1956 FINAL BILL AND PRELIMINARY BILL FOR 1957	NOTE: THIS IS THE BILL FOR 1956. IT ALSO THE PRELIMINARY BILL FOR 1957. NO BILL WILL BE MAILED AN UP NOV. 1, 1956. FOR PRELIMINARY PAYMENTS OF 1957 YOU WILL RECEIVE ONE BILL ONLY FOR THE 12 MONTH PERIOD.
County Taxes Apportioned (Exclusive of Bank Stock Taxes) \$ 287488	ADDRESS <i>Homestead + Woods + Marsh</i>	WASHINGTON TOWNSHIP	
County Library Taxes 804997		Burlington County, N. J.	
District School Tax 1223100			
Other Local Taxes 140111			
Authorized Rate per \$100.00 \$17.26			

RECEIPT FOR 1ST QUARTERLY INST. DUE AUGUST 1, 1956	RECEIPT FOR 2ND QUARTERLY INST. DUE NOVEMBER 1, 1956	RECEIPT FOR 3RD QUARTERLY INST. DUE FEBRUARY 1, 1957	RECEIPT FOR 4TH QUARTERLY INST. DUE MAY 1, 1957
DATE <i>7-20-56</i>	DATE <i>7-20-56</i>	DATE <i>2-5-57</i>	DATE <i>2-5-57</i>
<i>William Walters</i> Collector	<i>William Walters</i> Collector	<i>William Walters</i> Collector	<i>William Walters</i> Collector

AN appeal must be filed with the County Board at Mount Holly, N. J., on or before August 15, 1956. Blank forms for making appeals may be obtained from Mary Albert, Township Clerk.	IMPORTANT PRESENTS THIS BILL
---	------------------------------

The Burlington County Board of Taxation will sit to hear appeals from assessments for the year 1956 at Shepherd's Hall, Green Bank, Tuesday, September 11th, 1956, at 1 P. M., for Washington Township.

WILLIAM WALTERS, Collector of Taxes, Green Bank, RD 2, Egg Harbor, N. J. Phone, WOrth 3-8112-J-1

Block or Section	Lot or Parcel Number	ACRES	PAGE	LINS	LAND		BUILDINGS	PERSONAL	DEDUCTIONS	NET VALUATION TAXABLE				
62	63	4.25	42	10	2,200	-	400	-	150	-	100	-	2650	-
	64													
	65													
	66													
	66													
	4													
	12													
	13													
	14													
	17													
	25													
	28													
	29													
	30													

<small>NOTE: Interest at the rate of 6% will be charged on an delinquent tax.</small> LINES PRELIMINARY BILL (IN 1954 TAX)	TOTAL TAX 1955	2ND QUARTERLY INST. DUE AUG. 1, 1955	4TH QUARTERLY INST. DUE NOV. 1, 1955	1ST QUARTERLY INST. DUE FEB. 1, 1956	2ND QUARTERLY INST. DUE MAY 1, 1956	
	\$292.14	\$58.31	\$58.32	\$58.03	\$58.04	
	pa. 115.51					
FINAL BILL 1955	\$116.63					
						DISCOUNT INTEREST TOTAL

1955 RATE PER \$100.00 County Taxes Appor- tioned (Exclusive of Bank Stock Taxes) \$2.28445 County Library Taxes 0.03648 District School Tax 4.93508 Other Local Taxes 1.40028 Authorized Rate per \$100.00 \$8.76	NAME <u>Mc Anney, Howard.</u> ADDRESS <u>Homestead</u> <u>Hoods + Marsh.</u>	THIS IS THE FINAL BILL AND PRELIMINARY BILL FOR 1955 WASHINGTON TOWNSHIP Burlington County, N. J.
---	--	---

RECEIPT FOR 2ND QUARTERLY INST. DUE AUGUST 1, 1955 PAID <u>5-31-55</u> William Walters <small>Collector</small>	RECEIPT FOR 4TH QUARTERLY INST. DUE NOVEMBER 1, 1955 DATE <u>5-31-55</u> William Walters <small>Collector</small>	RECEIPT FOR 1ST QUARTERLY INST. DUE FEBRUARY 1, 1956 DATE <u>3-24-56</u> William Walters <small>Collector</small>	RECEIPT FOR 2ND QUARTERLY INST. DUE MAY 1, 1956 DATE <u>3-24-56</u> William Walters <small>Collector</small>
--	--	--	---

NOTE: THIS IS THE FINAL BILL FOR 1955. IT IS ALSO THE PRELIMINARY BILL FOR 1956. NO BILL WILL BE MAILED AS OF NOV. 1, 1955 FOR PRELIMINARY PAYMENTS IN 1956. YOU WILL RECEIVE ONE BILL ONLY FOR THE 12 MONTH PERIOD.

All appeals must be filed with the County Board of Assessors, N. J., on or before August 15, 1955. Rules forms for making appeals may be obtained from Mary Athol, Township Clerk.

**IMPORTANT
PRESERVE THIS BILL**

The Burlington County Board of Taxation will sit to hear appeals from assessments for the year 1955 at Shepherd's Hall, Green Bank, Tuesday, September 19th, 1955, at 1 P. M., for Washington Township.

WILLIAM WALTERS, Collector of Taxes, Green Bank, RD 2, Egg Harbor, N. J.

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MGT. PLAN

Recommendation # 2

A. Township of Washington, Burlington County
Green Bank, RR 2 Egg Harbor City NJ 08215

B. Failure of the Pinelands CMP and the State of New Jersey to provide equitable in-lieu-of tax relief for Pinelands communities and residents, due to the extent of State-owned land.

C. Topic is IMMEDIATELY important.

D.1. The 1906 Forest Reserve Act of New Jersey provided 10¢ per acre in-lieu-of tax payments, to municipalities for lands removed from the tax rolls for State Forests and Parks.

2. The first Green Acres bond issue provided for no in-lieu payments.

3. The State of New Jersey enacted P.L. 1989, chapter 347, codified as NJSA 13:1L-7, which provided increased payments of \$1 per acre.

4. The Pinelands Commission endorsed this legislation, but has no authority for its implementation.

5. The New Jersey Bureau of Parks did not budget for the legislated payments and refused municipal vouchers for the \$1 per acre payments.

6. During 1991, Washington Township was notified by Green Acres of the pending acquisition of 414 acres that had been planned for State purchase, and of an additional 308 acres. This will remove \$263,100 in valuation from the tax rolls of the Township.

7. Reduction in property tax ratables due to past and continuing State acquisitions, must be made up in municipal revenues by increasing taxation upon the remaining private property. In communities of the Preservation area with State ownership of 80% or more, this financial burden is placed primarily upon the Pinelands residents.

8. The Pinelands CMP endorses the continuing State acquisition of private property within the Preservation area, without consideration of the extent of existing public lands, the fiscal impacts of past and continued reduction in tax ratables, the need for State-acquisition of lands otherwise restricted to preservation, or the failure of the State to institute either the Legislatively-mandated \$1-acre payments or any other form of equitable tax relief.

9. The Pinelands CMP provides no program for achieving equitable financial relief in-lieu-of taxes for present and future State lands.

E. No related issues.

F. Washington Township resolution 1991-28 (copy attached).

G. Mayor William Haines, Jr.

RESOLUTION 1991 - 28

A RESOLUTION OF THE TOWNSHIP OF WASHINGTON, COUNTY OF BURLINGTON DEMANDING THAT THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION PAY THE AMOUNT OF \$1.00 PER ACRE OF STATE FOREST LANDS AS PAYMENT IN LIEU OF TAXES AS REQUIRED BY N.J.S.A. 13:11-7 AND DIRECTING THAT COPIES OF THIS RESOLUTION BE FORWARDED TO INTERESTED PARTIES

WHEREAS, the New Jersey Legislature passed Public Law 1989, Chapter 347, codified as N.J.S.A. 13:11-7 concerning state parks and forests; and

WHEREAS, this legislation provides that if the New Jersey Department of Environmental Protection acquires or owns title to more than ten acres of land in a municipality, the Department shall annually pay that municipality \$1.00 per acre for each acre of land so acquired as payment in lieu of taxes; and

WHEREAS, N.J.S.A. 54:4-2.2(h) provides that payments in lieu of taxes by the State may be anticipated by the municipality in preparing its annual budget; and

WHEREAS, on or about February 8, 1991, the Township of Washington, Burlington County, received an invoice from the New Jersey Department of Environmental Protection, State Park Services, indicating the municipality would receive \$46,637.22 as payment in lieu of taxes for 46,372.17 acres of state forest; and

WHEREAS, the Township of Washington, County of Burlington, relied upon said invoice from the New Jersey Department of Environmental Protection in preparation of its annual budget; and

WHEREAS, the amount anticipated to be received by such payment in lieu of taxes comprises approximately twelve (12%) percent of the Township's 1991 annual budget; and

WHEREAS, the New Jersey Department of Environmental Protection forwarded a check to Washington Township, Burlington County, in the amount of \$4,660.00 and

WHEREAS, the New Jersey Department of Environmental Protection has notified Washington Township, Burlington County, that instead of paying \$1.00 per acre, it will pay 10 cents per acre as payment in lieu of taxes; and

WHEREAS, the failure of the New Jersey Department of Environmental Protection to pay the amount of payment in lieu of taxes as shown on the February 8, 1991 invoice will create a deleterious effect upon the citizens of Washington Township, Burlington County;

NOW, THEREFORE, BE IT RESOLVED that the Township Committee of the Township of Washington, County of Burlington, demands that the New Jersey Department of Environmental Protection pay to the Township of Washington, County of Burlington the exact amount of \$46,637.22 as reflected on the invoice submitted on February 8, 1991.

BE IT FURTHER RESOLVED by the Township Committee of the Township of Washington, County of Burlington, that a copy of this resolution shall be forwarded to the Office of the Governor, the State Treasurer, the Director of the Division of Budget and Accounting, the Commissioner of the New Jersey Department of Environmental Protection, State Senators C. William Haines, Leonard T. Connors, Jr., William Gormley, Raymond Iane, and Assemblymen Robert Shinn, Harold Colburn, Christopher Connors and Jeffrey Moran.

ATTEST:

MARGUERITE KEATING, Clerk

WILLIAM S. HAINES, Mayor

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MGT. PLAN

Recommendation # 3

A. Township of Washington, Burlington County
Green Bank, RR 2 Egg Harbor City NJ 08215

B. Failure of the Pinelands CMP and State of New Jersey to address the problems created by State lands, facilities and recreational visitors for law enforcement and emergency service agencies of municipalities within the Preservation area.

C. Topic is IMMEDIATELY important.

D.1. The State provides no compensation or contribution to local emergency agencies (fire departments and ambulance squads) that are called upon to serve Parks and Wildlife areas. Such agencies are organized, staffed and funded by local communities and residents. Emergency incidents to serve recreational visitors on State lands, constitute a significant demand upon local agencies, especially during summer recreational seasons. Compensation is made neither for the general services provided, nor for specific incidents, irrespective of the labor and costs incurred by the agencies.

2. Increasing Pineland's visitation brings increasing numbers of visitors into the region, especially in remote wildland areas. Pineland's visitors are generally ignorant of private property boundaries, and generally consider the region to be entirely "State Park." State Parks have inadequate Ranger staff to police their own land, which is constantly increasing in acreage due to on-going acquisitions. State Police are generally understaffed and unable to patrol wildland areas, either State or privately owned. Municipalities in the Preservation area do not have the resources to provide local police services.

3. Motorcycle enduros and auto road rallies, which are sanctioned by the Pinelands Commission and State Parks; and the attraction of four-wheel-drive recreation to the region, involves abusive traffic on the unimproved sand roads of the Pine Barrens. Pineland roads are deteriorating due to the increasing traffic load, abusive vehicle operations, and lack of maintenance. Woods roads are becoming impassable due to waterholes, which attract further 4WD abuse by mud hops; and broad sand tracts of rerouted and abandoned roads around sand holes. The lack of usable access roads prevents effective access for law enforcement and use regulation; and hampers emergency access for accidents and fires in wildland areas.

4. Crimes and environmental abuse grow on extensive State lands, and spill over onto adjacent private property - which in wildland areas, have no police authority which can effectively respond to landowners' needs for protection from trespass and vandalism.

E. No related issues.

F. No documents.

G. Mayor William Haines, Jr.

DEC 12 1991



TOWNSHIP OF SOUTHAMPTON

Route 206 and Retreat Road
Post Office Box 2417
Southampton Township, New Jersey 08088-2417

TOWNSHIP CLERK
609-859-2736

December 12, 1991

Terrence Moore, Executive Director
Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Subject: Comprehensive Management Plan Questionnaire

Enclosed you will find our recommendations to the Comprehensive Management Plan review.

Thank you for affording the Southampton Township Environmental Commission an opportunity to comment on this review. We know you will give every consideration to our suggestions and we look forward to the specific recommendation stage of this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Joan Fluegge". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joan Fluegge, Chairman
Southampton Township Environmental Commission

Encl. - (2) Recommendations

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

- A. Proposer (agency, name, etc.):
Southampton Township Environmental Commission
P. O. Box 2417
Southampton, NJ 08088
- B. Topic/Issue: PDC Program
- C. Topic/Issue is/will be of importance:
XX immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. PDC program should be comparable with TDR and farmland preservation.
(continue on back)
2.
(continue on back)
3.
(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

9/91
CP4B

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2

- A. Proposer (agency, name, etc.):
Southampton Township Environmental Commission
P. O. Box 2417
Southampton, NJ 08088
- B. Topic/Issue: Permitted Uses in the Forest Management Area.

- C. Topic/Issue is/will be of importance:
XX immediately.
_____ in the short term (next 5 to 7 years) or;
_____ longer term (beyond 7 years)
- D. Reasons for Importance:
1. Protection of environmental resources in ecologically-sensitive
forest region.

(continue on back)
 2. _____

(continue on back)
 3. _____

(continue on back)

-over-

E. Related Issue(s), if any: Composted Sludge

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

9/91
CP4B

**Board of Chosen Freeholders
Of The County of Burlington**

MOUNT HOLLY, NEW JERSEY
08060



OFFICE OF:
COUNTY ENGINEER
LAND DEVELOPMENT SECTION
48 RANCOCAS ROAD
MOUNT HOLLY, N.J. 08060
(609) 265-6081

December 12, 1991

The Pinelands Commission
P.O. Box 7
New Lisbon, N.J. 08064

Atten: Lois Cristarella

RE: REVIEW OF COMPREHENSIVE MANAGEMENT PLAN
RECOMMENDED ISSUES

Dear Ms. Cristarella:

In response to the letter from Terrence Moore to James Quinn, County Engineer, dated October 1, 1991, I have prepared a list of issues or topics that we would like to be considered in a future revision to the Comprehensive Management Plan (CMP). We appreciate the opportunity to give input into the review of the CMP and would be happy to meet with you to discuss these recommendations further.

Please contact me if you would like to discuss these issues or set up a meeting.

Very truly yours,

R. Thomas Jaggard
Planning Engineer

RTJ/mch
Attachment

cc: James L. Quinn, County Engineer (w/Attach.)
Joe Caruso, B.C. Bridge Engineer (w/Attach.)
Charles L. Baker, Sr. Transportation Planner (w/Attach.)
Pinelands File (w/Attach.)

**PINELANDS COMMISSION REVIEW OF
COMPREHENSIVE MANAGEMENT PLAN
MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW**

December 10, 1991

The name of the agency making these recommendations is the Burlington County Engineer's Office, Land Development/Planning Section, Attention R. Thomas Jaggard, Planning Engineer. The issues discussed in this report are important now and in the short term future. The experts on many of these issues would be NJDOT and NJDEPE. Also, the County Engineer's Office in Burlington County is very familiar with these issues. We would be happy to meet with you to discuss these recommendations further.

RECOMMENDATION #1

LINEAR TRANSPORTATION IMPROVEMENT PROJECT

- A. Growth in Pinelands and other portions of the State during the last ten (10) years has caused a significant increase in traffic on many roads through the Pinelands that now warrant improvements.
- B. Increased recreational traffic generated by the New Jersey beach resorts has caused increased traffic through the Pinelands.
- C. Public improvements to roadways is not well-addressed in the Pinelands Comprehensive Management Plan.

RECOMMENDATION #2

ROADWAY MAINTENANCE AND MINOR IMPROVEMENTS TO SHOULDERS AND DRAINAGE FACILITIES

- A. Restrictions on Highway Maintenance Departments doing normal maintenance on roadways and drainage facilities hampers work needed to assure driver safety.
- B. Minor improvements to shoulders and drainage facilities should be encouraged for improved driver safety.
- C. Replacement of existing drainage facilities and bridges should not require a permit.
- D. Safety of the travelling public should be given a higher priority in review of projects where environmental impact is an issue.
- E. Intergovernmental Agreements should provide more flexibility for minor improvements to improve safety.

RECOMMENDATION #3

WATER QUALITY FROM DEVELOPMENT RUNOFF

- A. Improved water quality from development runoff is essential.
- B. New methods of providing water quality other than standard recharge facilities need to be developed.
- C. NJDEPE is working on new standards for water quality.
- D. Many areas of the Pinelands have a high water table preventing the normal recharge facilities from meeting standards.

RTJ/mcb

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): N.J. Department of the Treasury, Office
of State Planning

B. Topic/Issue: Relationship of CMP and SDRP

C. Topic/Issue is/will be of importance:

X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. The State Planning Act recognizes the special statutory treatment of the
Pinelands by requiring that the adopted plans and regulations be used
in developing the SDRP. (OVER)
(continue on back)

2. For the SDRP to be the comprehensive planning document called for in
the State Planning Act, the CMP must be incorporated. The present SDRP
does it in a manner of a Statewide Policy issue; Is this the only way?
Should not the CMP recognize the SDRP?

3. There are State policies in the SDRP on issues not addressed in CMP.
How should the CMP and Commission reconcile them?

(continue on back)

-over-

E. Related Issue(s), if any: The overlap of the National Reserve and the incorporation of SDRP mapping for the CAFRA zone through the cross-acceptance process.

F. Relevant Documentation (list and attach if available any reports, etc.): Cross-acceptance comparison reports from Ocean, Atlantic, Cape May Counties.

G. Known Experts on Issue, if any: County planning directors of Pineland Counties, DEPE staff (former Division of Coastal Resources), OSP and Pinelands staff.

D: (1) cont. The cross-acceptance process, though, pointed out a need for coordination and cooperation between the respective Commissions in regard to planning practice and decision-making.

9/91
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STATE PLANNING
OFFICE
N.J. TREASURY DEPT.

OCT 8 10 14 AM '91

RECEIVED



New Jersey-American Water Company

Southern Division • 700 New Road • P.O. Box 405 • Linwood, NJ 08221

609-927-6062

File No. 050-774

December 11, 1991

Mr. Terrence Moore
Executive Director
The Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Re: Comments Regarding PCMP Review

Dear Mr. Moore:

With regards to the upcoming Pinelands Comprehensive Management Plan review, we would like to offer our comments concerning an issue that we feel affects ourselves and the utility industry as a whole. These general comments pertain to the application and approval process for utility lines and linear development.

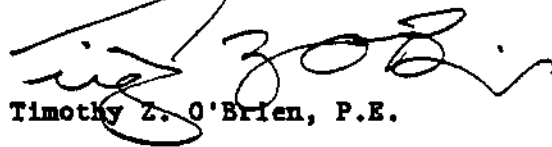
1. A well-defined, reasonable set of criteria should be established for the development of utility lines and linear developments. An established set of guidelines is necessary, since utility line developments are not being reviewed consistently, particularly with regards to a demonstration of alternatives, wetlands and wetlands buffers. The level and nature of the review appears to be primarily a function of the individual project review officer. This unpredictability results in significant time delays and cost expenditures for projects which have minimal impact on the resources of the Pinelands.
2. An established set of guidelines are necessary which simplify the application requirements for those utility line installations and linear developments which have minimal impact. Those projects which by nature of location and/or scale have minimal impact should not require the level of supporting documentation during the application and review phase as do larger projects. Such information only serves to increase project time and costs and often has little bearing on the final decision by the Commission.

Mr. Terrence Moore
December 11, 1991
Page 2

3. We disagree with the Commission's objective of determining only 5 major topics for review, if indeed this is to be a "comprehensive review". Although only broad topics have been requested, no information has been provided on what criteria will be used by Commission staff to determine these topics. Given that only 5 topics will be reviewed, this does not seem to be comprehensive in scope and will certainly neglect some topics which warrant review.

Thank you for providing us the opportunity to comment on the upcoming PCMP review. Please feel free to contact me regarding the comments or to discuss the points presented herein.

Very truly yours,
NEW JERSEY-AMERICAN WATER COMPANY
SOUTHERN DIVISION



Timothy Z. O'Brien, P.E.

TOB/dak
cc: H. J. Woods, Jr.
Doc. 0626D

DEC 12 1991

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): New Jersey Bureau of Forestry John E. Benton Jr. Regional Forester P.O. Box 239 New Lisbon, N.J. 08064

B. Topic/Issue: Forestry - Forest Stewardship / Conservation Forestry is not conservation or destruction of the New Pinelands. Forestry / Forest Management is managing a healthy diverse forest ecosystem / resource for its many benefits. There is a lack of focus on the perpetuation of the forest ecosystems utilizing public and professional guidance. Action must be taken to perpetuate this

C. Topic/Issue is/will be of importance: unique and valuable forest resource and inform the public of this.

Immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

D. Reasons for Importance:

- 1. Natural Resource Protection / Perpetuation - The Pinelands Forest is the umbrella of protection for all the region from soil, water, air and wildlife. The Commission should actively promote Forestry / Forest Mgt. (continue on back)
2. Cultural History + Social Impacts Man is a part of the New Pinelands, his needs and actions have directly caused much of what we see today. (continue on back) Man is a natural component of the entire system
3. Economic Impacts - historically to the present Iron, Glass, Charcoal, fuelwood, wildlife habitat, wood carving, Boat Building, Recreation etc. without the financial need of the local residents (continue on back) and otherwise the Pinelands would not be what they are today.

-over-

- E. Related Issue(s), if any: The forest resource cannot easily be separated from its whole. All environmental issues and resource users are intertwined into the very fabric we call the Cowlitz. Finding compromises, alternatives that promote a positive resource future is vital to the region. Using forestry as a partner to accomplish a broad range of resource benefits is very possible.
- F. Relevant Documentation (list and attach if available any reports, etc.): look at the private forestland activities in the past as compared to today. How many permits are given? Why does a private land owner have to wait a year for a permit to harvest their old trees.
- G. Known Experts on Issue, if any: Dr. Silas Little, George Pierson, Co. Lester, Albaugh, Ronald Datcher, Dave Edelman, Ted Gordon, John Kuser, Ron Steary, Dick West, George Zimmerman.

Forestry does not need to be restricted or over regulated to a point of non-existence as is the case. Forestry is the tool to perpetuate the unique and varied habitats of this region. Methods to bring the varied resource managers and users together towards a unified management strategy that promotes forestry would best serve the region and the residence of the state today and in the future.

**Pinelands
Preservation Alliance**

120-348 Whitesbog Road • Browns Mills, NJ 08015 • (609) 893-6747

To: The Pinelands Commission

Subject: Major Issues

From: The Pinelands Preservation Alliance Plan Review Committee

Date: December 13, 1991

In response to your request, the Plan Review Committee of the Pinelands Preservation Alliance submits the following issues, in order of importance, that we urge the Pinelands Commission to address during the 1992 review of the Comprehensive Management Plan:

I THE FOREST MANAGEMENT AREA

The Forest Management area "exhibits many of the same critical ecological values as the Preservation Area" (CMP Volume I, page 292). Yet Volume II of the CMP gives much less protection to the Forest Area than it does to the Preservation area. During the first ten years of the plan, several threats to the forest area have become apparent which urgently need study, analysis and, if warranted, changes in the CMP.

o The geographical extent of the grandfathered lots within the Forest Area should be evaluated. The total number of potential units, the number of units receiving approvals and the number of units built under this provision should be identified. The purpose of this study would be to determine if these grandfathered lots pose a threat to the Forest Area's integrity.

o The extent of resource extraction permits in the Forest Area should also be examined to determine their possible threat to the area. Limiting of future resource extraction should be considered.

o The Critical Areas Study done in preparation for the CMP (Rogers, Golden and Halpern), the discussion of Critical Areas in Volume I of the CMP (pages 183-191) and the map of Ecological Critical Area Importance Values (Plate 27) describe certain areas of the Pinelands which exhibit significant and critical areas. Many of these sites are in the Forest Area. The 1992 plan review by the Commission should examine the decision not to grant extra protection to these critical areas and set new standards if necessary.

o Current development densities and patterns created in municipalities within the Forest Area are almost sure to fragment and degrade the Forest Area. The creation of a development transfer program within a municipality by the recent changes in the waiver provisions of the CMP acknowledges that development within the Forest Area should be concentrated in appropriate areas while permanently protecting more sensitive areas. The extension of a similar transfer program to the whole Forest Area should be examined. Such a program or something similar should be devised to retard piece meal, fragmented development of the Forest Area, an area that, for its long term protection, must maintain large undeveloped areas.

The Board of Trustees

Hon. Brendan T. Byrne
Honorary Chair
Former Governor,
State of New Jersey

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of Staff, NJ D.O.T.

Howard P. Boyd
Past Pres., American
Ecological Society;
Author, *A Field Guide to
the Pine Barrens of NJ*

Michael F. Catania
Explorist Institute;
Former Deputy Com-
missioner, NJ D.E.P.

Bunzle Ellis Churchill
President, World Affairs
Council of Philadelphia

Sally Dudley
Executive Director,
AES of NJ Environ-
mental Commission

Michael Galloway
Pinelands Coordinator,
Sierra Club

David P. Moore
Executive Director,
New Jersey Conser-
vation Foundation

Franklin B. Parker
Director, NJ Field Office
of Trust for Public Land

James T.B. Tripp, Esq.
General Counsel, Environ-
mental Defense Fund

Nan Hunter-Walton
Coordinator,
Pine Barrens Coalition

II CUMULATIVE IMPACT

The CMP is a regional plan that covers the almost one million acres of the Pinelands Area. Ten years of experience after its implementation the CMP needs modifications to allow it to continue to be regional plan. Currently each application is evaluated on its own merits with little or no consideration of what exists in the larger landscape.

The only provision of the CMP that allows the Commission to address the secondary or cumulative impact of an application is 7:50-6.7 Significant Adverse Impact. This, however, applies only to wetlands and the Commission was unwilling to apply it in recent waivers approved in Medford Pines.

The Commission has no ability to address the secondary development that is likely to occur if the Atlantic City Airport is to be radically expanded. If a development is proposed that will "hook up" to a waste water treatment facility that is not environmentally sound, the Commission will approve it, because the Commission can only review the proposed development. Over the past few months several such projects have been approved.

The Federal and State legislation that created the Pinelands National Reserve and the Pinelands Area are based on protecting a one million acre ecosystem. The Management Area system of the CMP embodied this regional concept. Now is the time to apply such regional concepts to the administration of a plan that is beginning to lose its broader view.

III FUTURE GROWTH PATTERNS

Ten years after the implementation of the CMP it is important that the growth assumptions used ten years ago be evaluated against what actually happened in those ten years. And what will happen ten years in the future? The answers to these two questions will be needed to address many of the issues to be covered in this plan review.

Many other issues flow from the growth patterns:

- o Are the densities allocated to the Regional Growth Areas still appropriate?
- o Have these allocation affected the use of PDCs?
- o Are Municipal Reserves still needed?
- o Should design standards be set so that future growth is compatible with the culture and vernacular architecture that are characteristic of the Pinelands?

IV PROTECTION OF WILDLIFE HABIT

Regulatory language is needed to protect habitats of diverse communities of Pinelands flora and fauna. These natural communities, which are the basis of the biological diversity which characterizes the Pinelands, need to be identified and protected through regulatory language. The broad language of the CMP in paragraph 7:50-6.34 is inadequate to protect these natural communities which are essential to the survival of wildlife and plants.

The destruction of wildlife habitat and the need to maintain a world wide diversity of species has become a much more serious environmental concern over the last ten years. The CMP needs to recognize this

The CMP, similar to other resource protection plans, concentrates its protection standards on wetlands and endangered species, but provides for little or no protection to uplands areas that contain significant wildlife habitat.

The CMP needs comprehensive and detailed standards to address issues of wildlife habitat protection.

V DENSITY TRANSFER PROGRAMS

As mentioned earlier, the approval of the density transfer program in the recently approved waiver provisions revision opens up a whole new area for density transfer. The Commission's recent review of PDCs should not prevent the issues of density transfers to be explored during this plan review. Several broad issues should be studied:

o Have the densities in the Regional Growth area set in the CMP been so generous that PDCs are not considered necessary by developers?

o Should PDCs be used in Pinelands Towns?

o Should certain "critical areas" in the Forest Area be allocated PDCs?

o Does the recent decision of the Corps of Engineers allowing the conversion of wetlands to cranberry bogs affect the PDCs allocated to the converted land?

The recent amendments to the CMP providing for new density transfer program in the Forest and Rural Development Areas and the importance of deed restrictions exhibited in the same amendments reveal the importance the commission places on the concept of transfer of density. This makes a broad review of both the PDC and density transfer program doubly important at this time.

VI WASTE MANAGEMENT

"The generation and disposal of solid waste, including hazardous waste and some forms of liquid and semi-solid waste, is an increasingly difficult and complex management problem." So said Volume I of the CMP in 1981. The situation has changed but is still "difficult and complex" and is still a management problem.

While 43 landfills have been closed in the first ten years of the plan, the continuing inability of the Commission to close the Cape May Landfill and the rumored application to reopen the Ocean County landfill makes it impossible to consider the landfill problem closed.

There should be a review of the 43 closed landfills to determine the effectiveness and quality of the closures. The possibility of alternative use of the closed landfills should be explored. Can closed landfills, for example, be used for wildlife habitat?

The increasing need for space to dispose of sewer sludge appears to be the next stage of the solid waste problem. Unfortunately, but not uncharacteristically, the Pinelands have quickly become a place for such disposal. The present inability of the Pinelands Commission and the DEPE to conclude a Memo of Agreement on the use of sewage sludge in the Pinelands is evidence of the need for new standards.

The nature of the Pineland's soils and vegetation make it increasingly important that the Commission review and strengthen the CMP standards regarding solid waste.

VII ENDANGERED SPECIES

The endangered plant species list should be up-dated. The DEPE endangered species list of animals should be reviewed to determine if it should be expanded to include animals specific to the Pinelands.

The diversity and protection of all life forms in the Pinelands is one of the cornerstones of the legislation establishing the Pinelands Commission and the CMP. The fact that the endangered plant species list has not be revised since the CMP was established shows that the list does not reflect current knowledge of endangered flora.

VIII SCIENCE AND RESEARCH

The scientific research to support the regulatory actions of the Commission is falling behind the needs for such research. The strength of the introduction and defense of the CMP was largely dependent of the studies done in 1979 and 1980. The failure of any institutions to support the Kirkwood-Cohansey Aquifer study is a disappointment to all who are concerned about the Pinelands. The fact that the comprehensive monitoring study takes only the small steps that the Commission itself can supply is unfortunate.

It behooves the Commission to seek out small scale, less expensive water quality research studies for which money might be readily available.

Several of the issues described above cry out for scientific studies, yet our hopes are low for the money being available to conduct such studies. It is likely the the quality of this plan review will suffer because of the lack of a research basis for the decisions that have to be made.

This void has the potential for significantly weakening the long term protection of the Pinelands.

TOWNSHIP HALL
Pinewald - Keewick Road
PHONE: (201) 244-7400

DEC 12 1991

ENVIRONMENTAL COMMISSION
P.O. Box 8
BAYVILLE, N.J. 08721

BERKELEY



TOWNSHIP

December 11, 1991

Ms. Lois Cristarella
The Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Re: Your October 1 Letter; Input to Pinelands CMP

Dear Ms. Cristarella:

The Environmental Commission of the Township of Berkeley has discussed the above referenced topic and instructed me to sent the attached response form indicating our recommendations of topic/issues needing review.

We are pleased to have been given the opportunity to respond with suggestions as the Pinlands Commission begins it's review of the Comprehensive Management Program.

Please feel free to contact me at the above address should the need arise.

Sincerely,

Helen M. Richmond
Helen M. Richmond
Chairperson

Enclosure

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Berkeley Township Environmental Commission Mrs. Helen Richmond, Chairman

B. Topic/Issue: Solid Waste All landfills should be closed. No materials processing facilities should be built. New waste-recycling facilities should be allowed. No transfer stations of any type. All closed landfills should be closed by EPA + DEPE standards.

C. Topic/Issue is/will be of importance: 1, 2, 3 immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

- D. Reasons for Importance: 1. Solid Waste Management including sewage sludge application (continue on back) 2. Mining in the Pinelands Forest Area (continue on back) 3. Public development infrastructure (continue on back)

-over-

E. Related Issue(s), if any: Close So. Ocean County landfill in accordance with all Federal, State, County & Municipal rules & regulations & keep it closed. Prohibit "clear cutting" of trees in the Pinelands. Prohibit motor vehicle races in Pinelands. Prohibit construction & building of all types detrimental to the Pinelands.
(Cont'd below)

F. Relevant Documentation (list and attach if available any reports, etc.): Available if requested

G. Known Experts on Issue, if any: _____

E. precarious ecosystem of the Pinelands. Prohibit the application of Sewage Sludge and Sewage Sludge derived products in the Pinelands. Prohibit the puncturing of the aquifer or aquifers during mining operations in the Pinelands.

9/91
CP4B



PSEG Public Service
Electric and Gas
Company

80 Park Plaza, Newark, NJ 07101 / 201 430-5858 MAILING ADDRESS / P.O. Box 570, Newark, NJ 07101

James A. Shissias - General Manager
Environmental Affairs

December 12, 1991

Ms. Lois Cristarella
The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Dear Ms. Cristarella:

**PINELANDS COMPREHENSIVE MANAGEMENT PLAN
REQUEST FOR COMMENTS**

This is in response to your letter of October 1, 1991 requesting a listing of important topics and issues to be addressed as part of the Pinelands Commission's review of the Comprehensive Management Plan (CMP). The following topic is offered for consideration:

LINEAR DEVELOPMENT

As demands on existing roads and utilities increase, existing infrastructure will require expansion. The CMP does have short comings related to linear development. This type of development should be one of the utmost important topics to be considered during the review of the CMP.

- * The CMP should encourage the preservation of existing linear developments (i.e. roadways, railroad rights-of-way and public utility easements) to the maximum extent practicable for proposed projects that require the expansion of future needs. This will help to reduce the impact of undeveloped lands of the Pinelands area and be in conformance with the goals and objectives of the CMP.
- * Utility lines and linear development projects, including gas transmission pipelines should have specific guidelines and performance standards to eliminate inconsistencies between project reviews. By establishing these guidelines designs can incorporate the concerns of the Pinelands Commission prior to review which will result in the reduction of time delays and ultimately construction costs.

Public Service Electric and Gas Company is thankful for the opportunity to provide comments on the review of the Comprehensive Management Plan. Should further input be required, please feel free to contact this office at your earliest conveyance.

Very truly yours,

James L. Shisias / RAT

**PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN**

**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Department of Environmental
Protection and Energy (DEPE) - Site Remediation Program

B. Topic/Issue: Exclude Remediation of Hazardous/Non-Hazardous Waste
Sites from Definition of "Development"

C. Topic/Issue is/will be of importance:

_____ immediately
 X in the short term (next 5 to 7 years) or;
 _____ longer term (beyond 7 years)

D. Reasons for Importance:

1. Pending MOA will set forth conditions; redundant or confusing
to include criteria in development definition.

(continue on back)

2. _____

(continue on back)

3. _____

(continue on back)

-over-

Post-It™ brand fax transmittal memo 7571		# of pages >	1
To	Terrence Moore		
From	Lance Miller		
Co.	Co.		
Dept.	Phone # 984-2902		
Fax #	894-0026		



STATE OF NEW JERSEY
DEPARTMENT OF AGRICULTURE

ARTHUR R. BROWN, JR., SECRETARY

CN 330

TRENTON 08625

December 13, 1991

Mr. Terrence D. Moore
Executive Director
Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Dear Mr. Moore:

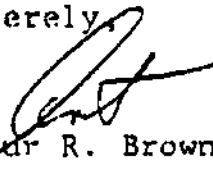
In January 1990, at the invitation of the Commission, the Department of Agriculture submitted testimony to the Public Participation Committee. Included in the Department's testimony were two suggestions which, according to correspondence in October from Ann Auerbach, Chairperson of the Public Participation Committee, required changes to the Comprehensive Management Plan (CMP). The suggestions concerned Commission procedures for reviewing applications for farm labor housing and the Commission strengthening the market for PDC purchase by providing incentives for the use of PDCs.

Although these topics may not be considered a major focus for the upcoming comprehensive review of the CMP, they are important economic issues to Pinelands farmers. Accordingly, we request that they be included as topics for consideration in the Commission's review of the CMP.

Thank you for the opportunity to address these important issues which we consider critical to the maintenance of an economically viable agriculture in the Pinelands.

Best wishes for the holidays.

Sincerely,


Arthur R. Brown, Jr.

c: Lois Cristarella

BANISCH
ASSOCIATES
PLANNING CONSULTANTS
P.O. BOX 154, SERGEANTSVILLE, OHIO 43087-0154
766 787-8830/706 154

MEMORANDUM

TO: Lois Cristarella
Larry Liggett

FROM: Francis J. Banisch III, PP/AICP *FJB*

DATE: December 13, 1991

SUBJECT: Review of the Pinelands Comprehensive Management Plan
Major Topic/Issue Recommended for Review

Enclosed are seven items, numbered PT1 through PT7, which the Pemberton Township Planning Board recommends for review by the Pinelands Commission.

We would be pleased to answer any questions you may have concerning these items, or to provide suggestions as to how the Commission might address them.

cc: Betty Donelson
Bob Rogers

pe/pine.mem

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT1

- A. Proposer (agency, name, etc.): Pemberton Township
- B. Topic/Issue: Waiver of Strict Compliance "Buy Sell" Letters for municipally-owned properties.
- C. Topic/Issue is/will be of importance:
- Immediately
 - In the short term (next 5 to 7 years)
 - Longer term (beyond 7 years)
- D. Reasons for Importance:
1. Township cannot respond within 30 days and waiver gets approved, which is detrimental to both the Pinelands and the Township.
 2. Township must offer land at public or private auction which affects both the time line mentioned above and the ability of the Township to sell to the targeted land owner.
 3. Approval of waiver because of these circumstances is detrimental to the Pinelands because it promotes growth in inappropriate areas.
 4. Approval of waiver because of these circumstances is detrimental to the Township by promoting inappropriate levels and locations of development.
- E. Related Issue(s), if any:
- F. Relevant Documentation (list and attach if available any reports, etc.):
- G. Known Experts on Issue, if any:

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT2

- A. Proposer (agency, name, etc.): **Pemberton Township**
- B. Topic/Issue: **Regional Growth Area densities - Minimum density and maximum density permitted by CMP are the same, allowing no deviation.**
- C. Topic/Issue is/will be of importance:
- Immediately
 - In the short term (next 5 to 7 years)
 - Longer term (beyond 7 years)
- D. Reasons for Importance:
1. The fact that the minimum and maximum densities in RGA are the same means that a municipality must continuously change its zoning to exactly fit the prescribed number.
 2. This issue allows no flexibility in municipal zoning to respond to special needs.
 3. Continual zoning changes make for confusion and unpredictability.
- E. Related Issue(s), if any: **General review of growth projections and Regional Growth Area densities throughout the Pinelands.**
- F. Relevant Documentation (list and attach if available any reports, etc.): **The Pemberton township case file on municipal zoning and densities is a good example of the issue/problem.**
- G. Known Experts on Issue, if any:

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT3

- A. Proposer (agency, name, etc.): Pemberton Township
- B. Topic/Issue: **General review of growth projections and Regional Growth Area densities throughout the Pinelands.**
- C. Topic/Issue is/will be of importance:
- Immediately
 - In the short term (next 5 to 7 years)
 - Longer term (beyond 7 years)
- D. Reasons for Importance:
1. The Commission's growth projections drive the RGA densities and the growth projections are dated (1979 vintage) and may misstate the need based on assumptions that are no longer valid, i.e. casino impact.
 2. Dated or flawed growth projections may result in overstated numbers and densities in some areas, i.e. Atlantic County and parts of Ocean County, and understated numbers in other areas.
 3. Growth projections drive the land allocation system, and overstated growth projections may negatively impact Pinelands resources.
 4. Overstated growth projections may negatively impact the Pinelands Development Credit program by providing too much base density in RGA's.
- E. Related Issue(s), if any: Regional Growth Area densities - minimum and maximum are the same.
- F. Relevant Documentation (list and attach if available any reports, etc.): See CMP Chapter 5 and subsequent projections and reports by various governmental agencies.

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT4

- A. Proposer (agency, name, etc.): **Pemberton Township**
- B. Topic/Issue: **Establishing wetlands buffer standards by zone or sub-area within a municipality or Regional Growth Area.**
- C. Topic/Issue is/will be of importance:
- Immediately
 - In the short term (next 5 to 7 years)
 - Longer term (beyond 7 years)
- D. Reasons for Importance:
1. The Commission routinely establishes wetlands buffers that represent consistent reductions based on certain conditions within a Regional Growth Area (sewer availability, impacted wetlands).
 2. If these standards were institutionalized in a municipal ordinance, as done in some certified towns, it would make for more predictability and easier administration in the township.
 3. It would reduce the burden on Commission staff and applicants.
- E. Related Issue(s), if any:
- F. Relevant Documentation (list and attach if available any reports, etc.): See Medford Township's ordinance.
- G. Known Experts on Issue, if any:

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT5

- A. Proposer (agency, name, etc.): Pemberton Township
- B. Topic/Issue: Clarifying the issuance of Certificates of Appropriateness.
- C. Topic/Issue is/will be of importance:
- Immediately
- In the short term (next 5 to 7 years)
- Longer term (beyond 7 years)
- D. Reasons for Importance:
1. Municipalities do not have the technical expertise to review these applications.
 2. Municipality conditions any application for a Certificate of Appropriateness on satisfying the Commission.
- E. Related Issue(s), if any:
- F. Relevant Documentation (list and attach if available any reports, etc.):
- G. Known Experts on Issue, if any:

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #P16

- A. Proposer (agency, name, etc.): Pemberton Township
- B. Topic/Issue: Conflicts in definitions, procedures, and time limits between Comprehensive Management Plan and Municipal Land Use Law.
- C. Topic/Issue is/will be of importance:
- Immediately
 - In the short term (next 5 to 7 years)
 - Longer term (beyond 7 years)
- D. Reasons for Importance:
1. Commission should try to bring some of its definitions, procedures, and time limits more in line with the MLUL to avoid potential conflicts and misinterpretations.
 2. Conflicting definitions cause difficulty in interpretation and application review.
- E. Related Issue(s), if any:
- F. Relevant Documentation (list and attach if available any reports, etc.):
- G. Known Experts on Issue, if any:

Pinelands Commission Review of the Pinelands Comprehensive Management Plan

Major Topic/Issue Recommended for Review

Recommendation #PT7

- A. Proposer (agency, name, etc.): Pemberton Township
- B. Topic/Issue: Commission's "call-up" procedure and review of existing factual record.
- C. Topic/Issue is/will be of importance:
- Immediately
- In the short term (next 5 to 7 years)
- Longer term (beyond 7 years)
- D. Reasons for Importance:
1. "Call-up" procedures should be based on established factual record rather than development of a new record.
 2. "Call-up" procedures should mandate the review of the established record.
- E. Related Issue(s), if any:
- F. Relevant Documentation (list and attach if available any reports, etc.):
- G. Known Experts on Issue, if any:

THE PHILADELPHIA BOTANICAL CLUB
ACADEMY OF NATURAL SCIENCES
NINETEENTH and the PARKWAY
Philadelphia, Pa. 19103
13 December 1991

31 Burrs Mill Rd.
Southampton, NJ 08088

Terry Moore, Director
Pinelands Commission
15 Springfield Rd.
New Lisbon, NJ 08064

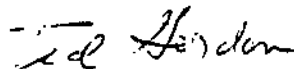
Re.: CMP Review

Dear Terry:

An update of the Pinelands rare species list is a priority that should be addressed during the current CMP review period. As you are aware, the current plant list was based on limited knowledge of species distribution in the seventies. Our present knowledge is extensive and will allow us to achieve an accurate listing.

Gravel mining operations routinely should be required to perform a rare and endangered species survey of each individual cell proposed for excavation. If this is currently a requirement it does not appear to be routinely enforced. Frequently such mining areas are ideal habitats for a number of rare botanical species.

Sincerely yours,



Ted Gordon, President



168 West State St., Trenton, New Jersey, 08608 tel. (609) 393-7163

December 13, 1991

Ms. Lois Cristarella
The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Re: Review of Pinelands Comprehensive Management Plan:
Proposed Review Topic

Dear Ms. Cristarella:

Attached please find the form containing our suggestion for major topics that we believe should be reviewed during the CMP review period. Our suggestion focuses on the requirements pertaining to agriculture including the Pinelands Development Credit program. It is the same as has been verbally presented to the Commission during past months by Ms. Fran Brooks of our staff.

The need to maintain and preserve agriculture in the Pinelands is central to the overall Pinelands program. Thus we hope that the staff and Commission will seriously consider the proposed topic.

Should you need any further details, please do not hesitate to call us.

Sincerely,
Stephen J. George
Stephen J. George
President

SJG/sw
cc: Arthur R. Brown, Jr., Secretary of Agriculture
Steve Lee, III
Candace Ashmun

Post-It™ brand fax transmittal memo 7671		# of pages	3
To	Mrs Lois Cristarella		
Co.	Co. of 3rd. Dist.		
Dept.	Phone #		
Fax #	609/894-0026	Fax #	599-1207

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): New Jersey Farm Bureau

B. Topic/Issue: Comprehensive Management Plan regulations the
Pinelands Development Credit program as they pertain to agriculture,

C. Topic/Issue is/will be of importance:

- immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. We have found over the last decade that certain CMP requirements
pertaining to agriculture as well as some of the general requirements
have made it more difficult to farm, and to improve and expand farm
(continue on back)
2. The PDC system and program is the foundation of the Pinelands program.
To date, no thorough and open discussion of the PDC program has taken
place. Evaluation of the program in terms of achieving PDC program
(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: Fran Brooks and Pinelands area farmers; NJ Department of Agriculture; Rutgers Cooperative Extension; Farm Credit System.

1. cont. -
operations. Because the maintenance of agriculture is one of the primary goals of the CMP, a review of these requirements and their effects on the industry is critical and should be conducted.

NJFB is developing a series of problem areas and recommendations for change which we would like to bring to the Commission for discussion.

2. cont. -
goals has not yet been conducted with a view toward remedying identified problems. We believe that it is necessary and timely to examine the program's experience.

A review of how the program is functioning with respect to such aspects as administration, land owner participation, credit values, development opportunities, etc., needs to be undertaken.

DEC 16 1991

Township of Medford

17 North Main Street, Medford, New Jersey 08065

609-654-2600

FAX 609-953-4037

Division of Planning and Zoning

December 12, 1991

Ms. Lois Cristarella
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

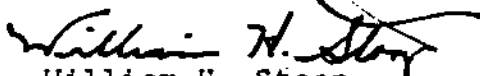
RE: Review of the Pinelands Comprehensive Management Plan

Dear Ms. Cristarella:

Enclosed please find comments from Christopher J. Noll,
Medford Township Planning and Zoning Board Engineer
regarding Solid Waste Management Policies of the Pinelands.

Should you have any question, please do not hesitate to
contact me.

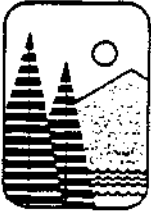
Very truly yours,


William H. Stoop
Planning Administrator

WHS/ah

Enclosure

DEC 16 1991



ENVIRONMENTAL RESOLUTIONS, INC.
ENVIRONMENTAL ENGINEERS, SCIENTISTS AND PLANNERS
16000 COMMERCE PARKWAY, SUITE P
MT. LAUREL, NEW JERSEY 08054
(609) 235-7170 • FAX (609) 273-9239

JEFFREY P. TAYLOR, PE, PP
PRESIDENT

#25002

CHRISTOPHER J. NOLL, PE, PP
EXECUTIVE VICE-PRESIDENT
GENERAL MANAGER

ANGELO J. CARACCILO, LS, PP
SECRETARY AND TREASURER

BARBARA J. FEGLEY, AICP, PP
VICE-PRESIDENT

MEMORANDUM



TO: William H. Stoop
FROM: Christopher J. Noll *Con*
DATE: December 6, 1991
RE: Review of Pinelands CMP

As requested by the Pinelands Commission and your office, I have identified a topic that is of concern to Medford Township relative to the second comprehensive review of the Pinelands Plan.

The Township is concerned with the Solid Waste Management Policies of the Pinelands in that it is felt that these policies should be consistent with those required by the NJDEPE. It appears that the Commission will be considering a policy solely for the Pinelands. This may possibly lead to inconsistencies between State and Pinelands' requirements as well as introduce another level of detailed review and permitting. Thus, it is important that the Pinelands' policy be consistent with that of the State and that this consistency be reflected in the regulations and the CMP. The Solid Waste Management Policy should address at a minimum: leaf and brush composting, recycling centers, trash transfer stations and landfill monitoring and closures.

The Allegheny Society of American Foresters

NEW JERSEY DIVISION



December 12, 1991

Ms. Lois Cristarella
The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Dear Ms. Cristarella:

In response to the second comprehensive review of the Pinelands Plan, the New Jersey Division of the Society of American Foresters offers the following topic for review: APPLICATION FOR FORESTRY.

The Comprehensive Management Plan recognizes the importance of forest management in maintaining the character of the Pinelands and offering land use alternatives to the landowners in the region. We feel the realization of forest management in the Pinelands would be better served if forestry were classified as other than development, or exempted.

Reasons to classify forestry as other than development, or exemption:

1. The Pinelands considers forestry as development, so when pinelands municipalities adopted their harvesting ordinances, they did the same. The result: application to the municipalities for a forestry permit is usually through the planning board, as with a major or minor subdivision. To get a permit for forestry, the applicant pays the same fees, and must comply with the same requirements as engineers, surveyors, and as other specialists do, as applicants for building homes or shopping centers. The expense makes forestry impossible.
2. A separate procedure for forestry can reduce the time that a Pinelands application will take to process.
3. A separate classification for forestry may encourage application, which can result in the reduction of illegal cutting.

In addition, we feel that better communications between the Pinelands forester and professional foresters is needed to develop these ideas. We will gladly take more time with your representatives to discuss these issues.

Very truly yours,

Heather J. Gracie
Chair-Elect

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Part 2
Topics Compiled By Pinelands Commission Staff

The following topics have been compiled by the Pinelands Commission staff from a variety of different sources, most notably the 1990 survey of issues by the Commission's Public Programs Committee, various Pinelands related studies and reports, and experience gained in administering the Pinelands Comprehensive Management Plan (CMP). They do not represent staff recommendations; rather, they are intended to reflect a wide range of topics and issues which have been raised during the last several years.

PINELANDS MANAGEMENT AREAS & LAND USES

1. Pinelands management areas were delineated on the basis of criteria developed in 1980. Questions occasionally arise as to the validity of certain criteria and as to how they were applied (e.g. should a point source discharge eliminate a large area from Forest Area designation). A review of the criteria should be conducted in an effort to determine whether they or management area boundaries should be changed.
2. A variety of land uses are permitted in the various Pinelands management areas; however, some stark differences in the impact of uses permitted within the same management area exist. A re-evaluation of all uses in each management area should be conducted to determine how well they reflect the goals and objectives of the Pinelands Protection Act and the CMP.
3. Very few constraints exist on the types of land uses which may occur within Military and Federal Installation Areas. Some recent proposals have been controversial in nature (e.g. civilian air use of McGuire AFB, expansion of uses in the Preservation Area portion of Lakehurst Naval Air Station, and the location of various communication towers at the Warren Grove Weapons Range) and suggest that a more complete examination take place of the areas where development should be accommodated and the types and scale of such development.
4. There are 44 certified villages in the Pinelands and the CMP contains guidelines which municipalities are to follow when delineating them. Certified villages should be evaluated to determine how well they respond to these guidelines and, if there are major differences, the Commission needs to consider whether village delineations need to be revised.

5. The policies for "municipal reserves" have not yet resulted in long term planning for future development opportunities after Regional Growth Areas are developed. Questions also exist as to which (all, some or none) Rural Development Areas should become reserves. This growth management tool should be re-examined and, if the approach remains a sound one, areas which are appropriate for intensive development in the future should be identified now.
6. The CMP's policies relative to the designation of "infill" areas within the Preservation District have been deliberately structured to be limiting. However, at least one municipality believes the criteria are too limiting. A review of the 10 infill areas designated to date should be done to determine how well they correspond to the designation criteria. If significant differences exist, the Commission should explore changes to the designated areas and/or changes in the policies.
7. Resource extraction is a long standing enterprise in the Pinelands. It does, however, result in long term changes to the Pinelands landscape both through expansion of existing uses in the Preservation District and through new operations in the Forest Area. The Commission needs to evaluate trends and impacts in this land use and consider ways to reduce the long term potential for negative impacts.

ZONE DENSITIES AND DEVELOPMENT

8. Concern has been expressed that the CMP provides for too much residential development in Regional Growth Areas, on an overall basis and within specific Regional Growth Areas. Other concerns exist that "underdeveloping" growth areas may unnecessarily limit the building industry, undercut affordable housing efforts, and increase future pressures for development in more conservation oriented areas in the Pinelands to accommodate unmet housing demands. A re-examination of growth trends, changes in housing markets, and densities should be undertaken to determine whether current development policies in Regional Growth Areas are appropriate.
9. The CMP seeks to place strict limits on the amount of residential development in Forest Areas. An evaluation of the CMP's Forest Area density requirements should be undertaken to determine if, when coupled with permitted "conditional" residential uses (e.g. "cultural housing" and "grandfathered lots"), potential development levels in Forest Areas are consistent with CMP expectations.
10. A number of different opportunities for residential development currently exist in Pinelands agricultural areas. Some concerns exist that these varied opportunities may be frag-

menting important agricultural lands. This should be evaluated and, if it is found that fragmentation is occurring, steps that can be taken to better protect these areas from incompatible development need to be considered.

11. The Interim State Plan advocates clustering development in and around existing settled areas, such as Pinelands villages. Because of various Pinelands development standards (most notably those related to septic system use), some unsewered Pinelands villages may have limited residential and business development options. It is worthwhile to evaluate Pinelands villages as communities of place and determine whether Pinelands land use and development policies achieve such a goal.
12. On-site clustering of residential development has advantages and disadvantages. During its first review of the CMP, the Commission took steps to encourage on-site clustering in some instances but to discourage it in others. A re-evaluation should be undertaken to determine if greater or lesser use of this subdivision technique would better promote resource protection.

CRITICAL RESOURCES

13. It has been suggested that particularly critical areas in the Pinelands (e.g. Forked River mountains, the corridor connecting the northern and southern forests) transcend the management area designations included in the CMP. Critical areas throughout the Pinelands need to be specifically identified and CMP land use policies evaluated to determine if they afford an appropriate level of protection. If not, alternative land use programs need to be developed.

ALTERNATIVE PROTECTION STRATEGIES

14. When the CMP was first developed, the Commission surveyed and considered innovative land use and environmental programs which had been attempted elsewhere in the United States for potential use in the Pinelands. A variety of new approaches to land use management and natural resource protection have been developed in the last decade. These types of programs developed elsewhere, including land trusts and quasi-public conservancies, should be explored to evaluate their applicability to the Pinelands.

PINELANDS DEVELOPMENT CREDIT PROGRAM

15. Pinelands Development Credit program activity has increased in recent years yet may not be at an optimal level. Opportunities to further improve the program in terms of

resources protected, economic benefits to property owners, flexibility for municipal planning and opportunities for expanded PDC use need to be conducted.

PINELANDS DEVELOPMENT STANDARDS

16. When adopted, the Commission's wetlands protection program and other environmental controls were among the most comprehensive and progressive in the country. Based upon Pinelands experience over the past ten years and efforts begun elsewhere, an assessment of ways to improve wetlands and other environmental standards contained in the CMP should be made.
17. The CMP establishes a water quality standard for nitrate-nitrogen and relies on a non-degradation standard for other pollutants. Concerns have been raised that the nitrate-nitrogen standard of 2 mg/l is either too stringent or too lenient and that the non-degradation standard is difficult to administer absent specific parameters and permitted concentration limits. These water quality requirements should be re-evaluated to determine whether (1) the nitrate-nitrogen standard, coupled with CMP density limits, sufficiently protects Pinelands water resources and (2) permitted concentration limits should be developed for other key parameters.
18. The nitrate dilution model for septic systems has been in use for a number of years. Several of the assumptions, such as vegetal uptake and household size, may warrant adjustment. A review of the model's assumptions should be made to determine if the model can be refined and/or whether the assumptions used in the calculations should be updated.
19. The Commission's stormwater management standards are sometimes criticized because they result in inefficient use of land and less than optimum management of stormwater. Additional approaches which might foster more efficient and cost effective management of stormwater, incorporate "state of the art" design and management techniques and still promote Pinelands environmental policies need to be explored.
20. Methods of harvesting and managing forest resources on both public and private lands are sometimes controversial. For example, clear cutting is viewed by some forest managers as a valuable management tool; however, public concerns about its use have been raised. An assessment of forestry management techniques and impacts should be conducted. If conflicts with environmental protection goals are found, alternative forestry management policies need to be considered.

21. The Commission maintains its own list of threatened/endangered plants and relies on the state's list for wildlife species. An examination of Commission, state and national lists of threatened/endangered plants and animals should be undertaken to determine whether changes relative to the Pinelands should be made.
22. The Commission's scenic resources program may not be truly effective in protecting important scenic attributes. Opportunities to develop a more comprehensive set of policies and/or design criteria should be considered as well as the appropriate level of government to administer them.
23. The Commission's air quality program essentially relies on existing state standards. Some concerns have been expressed that the special conditions of the Pinelands warrant different standards. The Commission should consider whether special Pinelands standards are warranted and, if so, how they might be administered.
24. Preservation of important historic resources is often accomplished on an ad hoc basis and is difficult to reconcile with on-site development plans. Questions of economic and engineering feasibility are difficult to address. Consideration of other preservation alternatives, such as provision for the transfer of development rights, to broaden preservation opportunities should be undertaken.
25. The Commission's solid waste management program focuses mostly on landfills and, as such, is primarily one dimensional. A more comprehensive set of policies which address siting and other standards for recycling activities, composting activities, illegal dumping and other waste disposal and management practices needs to be considered. Strategies to guide the Commission in these matters should be developed.
26. The CMP sets forth a resource extraction program which governs permitted mining operations. This program specifies development review procedures, standards affecting extraction activities, and reclamation practices. Concerns have been expressed that these standards are either too stringent or not comprehensive. The Commission should re-evaluate these standards and consider whether changes are warranted.
27. Generally speaking, extensions of sewers should be limited to designated development areas to preclude unwarranted development pressures in more conservation oriented areas. Commission policies permit exceptions in limited cases for public health reasons; however, a question exists as to whether these policies properly account for other goals

(e.g. environmental objectives). The Commission should evaluate where and under what circumstances modifications to these exceptions are appropriate.

MANAGEMENT OF RESOURCES

28. Cedar is an important yet historically diminishing resource in the Pinelands. Recent trends should be evaluated to determine if viable cedar stands are still diminishing. If this is found to be the case, steps to better manage the resource need to be considered.
29. Fire plays a critical role in the maintenance of the Pinelands ecosystem. However, development inhibits the use of fire as a management tool and residential construction in high fire hazard areas is viewed by some as unwise. Efforts to promote fire ecology as well as to reduce hazards need to be evaluated for effectiveness.
30. State conservation and recreation lands comprise one-third of the Pinelands, yet a clearly articulated and comprehensive set of conservation and recreation policies which seek to harmonize individual agency objectives and minimize conflicts among users do not exist. The Commission should consider, along with the Department of Environmental Protection and Energy, whether a set of comprehensive policies is worthwhile and, if so, how they might be developed.

DESIGN CONSIDERATIONS

31. The CMP seeks to broadly regulate land use and establish design standards which are related to the protection of natural resources. Community and site design principles (such as those which dictate neighborhood character) are left to municipal discretion. The Commission needs to consider whether it should assume a greater role in certain community and site design issues or whether there may be areas where more municipal discretion and flexibility are appropriate. Consideration of how those goals can be meshed with environmental policies must also be evaluated.
32. The use of native landscaping materials can lessen the demand for consumptive water use and the need for fertilizers and other chemical treatments. Yet their use may often be viewed as unconventional and may not be well known by homeowners. Additional steps which the Commission can take to encourage the use of native materials in landscaping or to identify other landscaping treatments which are equally effective in meeting CMP goals need to be explored.

ENFORCEMENT

33. Current Pinelands enforcement policies may be significantly broadened with the enactment of pending state legislation. Efforts should be made to identify the strengths and weaknesses of other state enforcement programs so that the Commission's programs (e.g. specific regulations) are developed in an efficient and effective way.
34. Because of the unique intergovernmental relationship which has been put into place in the Pinelands, municipal and county governments as well as other state agencies can play a major role in the enforcement of Pinelands land use and development standards. Creative ways to promote a greater role by these parties need to be explored.

PINELANDS PERMIT PROCEDURES

35. Privately sponsored development applications undergo a series of separate Commission reviews which are tied to individual approvals issued by local and state agencies. Ways to better coordinate and streamline this process without sacrificing Pinelands protection goals should be explored.
36. The Commission and its staff review many different types of public development projects. There is a need to evaluate how much time and effort is devoted to relatively minor projects and whether opportunities to streamline the review process exist.

ENVIRONMENTAL MONITORING

37. Plans to establish a long term environmental monitoring program for the Pinelands may proceed much more slowly than hoped due to financial constraints. Alternatives should be explored which might enable an "interim" program to be established more quickly and expanded at a later date when funds permit.
38. Agriculture is a prominent land use in the Pinelands, and questions periodically arise about the scope and magnitude of its impact on natural resources (e.g. water quality, landscape diversity). Current research on these topics should be evaluated to determine if a program to more comprehensively monitor positive and negative agricultural impacts in the Pinelands should be developed.

ECONOMICS

39. The CMP seeks to promote the continued viability of agriculture in the Pinelands. However, some concerns have been expressed that the CMP's programs may not be effective, either because they unnecessarily hinder agricultural activities

and create economic burdens detrimental to the long term viability of the industry or because agricultural lands are not being sufficiently protected. An evaluation of the CMP's agricultural programs and approaches used elsewhere in the country should be undertaken to determine what changes, if any, might help to better ensure the long term viability of agriculture in the Pinelands.

40. Concerns have been expressed at times that the CMP creates imbalances in municipal financial structures. For example, growth area communities have suggested that additional means of financing the costs of infrastructure and services need to be considered. On the other hand, communities with limited development potential have argued that a lack of growth in their real estate tax bases creates property tax burdens. An evaluation of trends in municipal government expenditures, tax bases and property taxes should be conducted and, if imbalances are found, approaches to address inequities without compromising CMP land use objectives need to be developed.

STATE PROGRAM COORDINATION

41. Land use in the coastal portion of the Pinelands National Reserve is generally governed by the Coastal Area Facility Review Act. Although the land use recommendations of the Pinelands Comprehensive Management Plan are taken into account in the Coastal Area, there is not total uniformity among the two sets of policies. With the advent of the Interim State Plan, a thorough review of Pinelands, Coastal and State Plan land use policies should be completed, and opportunities to unify them should be explored.
42. Coastal Area development policies and Pinelands development standards are generally consistent; however, differences do exist (e.g. water quality, stormwater management). Opportunities to make both sets of standards/policies more consistent and effective should be explored.
43. Land use policies outside of the Pinelands National Reserve but adjacent thereto should be consistent with and supportive of Pinelands policies. With the advent of the Interim State Plan, opportunities to analyze and promote consistency of land use plans and policies should be explored.
44. Long term highway improvement and development plans should be consistent with Pinelands protection policies. State planning efforts now underway (e.g. Route 55) should be reviewed in an effort to identify potential conflicts and to highlight opportunities to foster better consistency and coordination with the New Jersey Department of Transportation.

FEDERAL PROGRAM COORDINATION

45. State assumption of Section 404 permit jurisdiction has the potential to simplify administration of wetlands policies within the Pinelands. Recognizing that Pinelands and statewide wetlands policies are not identical, significant differences should be identified and, if less comprehensive Pinelands policies which might affect the state's assumption of Section 404 jurisdiction are identified, opportunities to make Pinelands policies consistent should be evaluated.
46. Pinelands scenic requirements and Federal requirements relative to signage along federally assisted highways may not be fully consistent. Efforts should be undertaken to assess the degree of consistency and, where inconsistent, steps should be identified to promote consistency.

FEDERAL FACILITIES

47. Future expansion of the Atlantic City International Airport at the Federal Aviation Administration Technical Engineering Center will have environmental and land use implications beyond its environs. Thoughtful advance planning may afford an opportunity to avoid potentially negative impacts. The Commission needs to consider what role it should properly take in this matter and what opportunities exist to encourage long term planning in and around the airport.
48. The potential for civilian use of McGuire Air Force Base will have environmental and land use implications beyond its environs. Thoughtful advance planning may afford an opportunity to determine if such use is appropriate and, if so, under what conditions. The Commission needs to consider what role it should take in this matter.
49. A great deal of discussion has occurred with respect to future military and civilian uses at Fort Dix but little attention has been focused on their consistency with Pinelands protection policies. The Commission should attempt to identify what proposals are most feasible at this point and determine what, if any, issues exist with respect to Pinelands protection policies.

INFRASTRUCTURE PLANNING

50. Water supply is a growing concern in the Pinelands, yet a clearly articulated and comprehensive set of policies to guide water supply planners do not exist. For example, strict conservation measures, growth management techniques, environmentally based siting criteria for water supply wells and recharge after wastewater treatment to maintain hydrologic balances represent measures which could be addressed. The Commission, in cooperation with the Department

of Environmental Protection and Energy, should consider developing a set of policies to ensure greater conservation and to reduce interim water supply demands pending completion of the Kirkwood-Cohansey aquifer study.

51. The CMP encourages central sewer facilities to service Regional Growth Areas and the Pinelands Infrastructure Trust Bond Act provides financial assistance for sewer projects. However, questions arise as to whether existing water quality and wastewater management plans sufficiently address both immediate and long term priorities and collectively represent a well conceived regional approach. Current wastewater planning efforts need to be evaluated and, if shortcomings are noted, opportunities to develop a more comprehensive planning framework need to be explored.

APPENDIX

REPOSITORIES

A copy of this report has been submitted to the following county libraries and county planning departments for public review.

COUNTY LIBRARIES

Atlantic County Library
2 South Farragut Avenue
Mays Landing, NJ 08330

Camden County Library
Laurel Road
Voorhees, NJ 08043

Cape May County Library
Mechanic Street
Cape May Court House, NJ 08210

Cumberland County Library
800 East Commerce Street
Bridgeton, NJ 08302

Gloucester County Library
200 Holly Dell Drive
Sewell, NJ 08080

Ocean County Public Library
101 Washington Street
Toms River, NJ 08753

COUNTY PLANNING DEPARTMENTS

Atlantic County Planning
Department
1333 Atlantic Avenue
Atlantic City, NJ 08401

Burlington County Office of
Land Use
49 Rancocas Road
Mt. Holly, NJ 08060

Camden County Planning
Department
6981 North Park Drive
5th Floor, West Building
Pennsauken, NJ 08109

Cape May County Planning
Department
Central Mail Room, DN 309
Cape May Court House, NJ 08210

Cumberland County Planning
Department
790 East Commerce Street
Bridgeton, NJ 08302

Gloucester County Planning
Department
1 North Broad Street
P.O. Box 337
Woodbury, NJ 08096

Ocean County Planning
Department
P.O. Box 2191
Toms River, NJ 08753

January 3, 1992

SUPPLEMENT

to

Reviewing the Pinelands Comprehensive Management Plan -
Compilation of Possible Issues and Topics
for Pinelands Commission Evaluation,
December 16, 1991

New Jersey Pinelands Commission

Revised 1/9/92

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Additional Topics Identified by Interested Parties

This supplement contains public comments submitted to the Pinelands Commission after the document entitled Reviewing the Pinelands Comprehensive Management Plan - Compilation of Possible Issues and Topics for Pinelands Commission Evaluation, December 16, 1991 was completed. This material has been reproduced here in the same form as it was submitted so that the Pinelands Commission may benefit from the precise recommendations and explanations presented by each organization and individual.

This supplement, along with the December 16, 1991 report, and the The Second Progress Report on Plan Implementation, will be considered by the Commission when it meets in late February, 1992 to identify and select what it considers to be the five most important topics facing the Pinelands in the coming years.



ENVIRONMENTAL EVALUATION GROUP

623 Main Street, P.O. Box 1090
Toms River, NJ 08754
Telephone: (908) 349-8010

DEC 10 1991 DEC 16 1991
FILE COPY

106 N. Main Street, P.O. Box 895
Cape May Court House, NJ 08210
Telephone: (609) 463-0704

December 6, 1991

The Pinelands Commission
PO Box 7
New Lisbon, NJ

Attn: Terrence Moore, Executive Director

Re: Comments Regarding PCMP Review

Dear Mr. Moore:

Regarding the upcoming second comprehensive review of the PCMP, I wish to offer the following comments. As requested by your letter of October 1, 1991, the following comments have been presented at this point in a brief, generalized format.

In general, these comments pertain to the application and approval process for utility lines and linear developments.

1. A well-defined, reasonable set of criteria should be established for the development of utility lines and linear developments. An established set of guidelines is necessary, since utility line developments are not being reviewed consistently, particularly with regards to a demonstration of alternatives, wetlands, and wetlands buffers. The level and nature of the review appears to be primarily a function of the individual project review officer. This unpredictability results in significant time delays and cost expenditures for projects which have minimal impact on the resources of the Pinelands.
2. An established set of guidelines are necessary which simplify the application requirements for those utility line installations and linear developments which have minimal impact. Those projects which by nature of location and/or scale have minimal impact should not require the level of supporting documentation during the application and review phase as do larger projects. Such information only serves to increase project time and costs and often has little bearing on the final decision by the Commission.
3. I disagree with the Commission's objective of determining only 5 major topics for review, if indeed this is to be a "comprehensive review". Although only broad topics have been requested, no information has been provided on what criteria will be used by Commission staff to determine these topics. Given that only 5 topics will be reviewed, this does not seem to be comprehensive in scope and will certainly neglect some topics which warrant review.

Re: Comments Regarding PCMP Review
Page Two

Please note that these comments are made in part by several years experience as a consultant working in the Pinelands Area on a variety of projects, including many utility line projects for a variety of utility companies. Please feel free to contact me regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "D. E. Ruhlin". The signature is written in a cursive, flowing style.

Douglas E. Ruhlin
Environmental Scientist

DER/dr

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

- A. Proposer (agency, name, etc.): Township of
Hamilton (Atlantic County)
Environmental Commission
- B. Topic/Issue: The Township of Hamilton has been designated
for high density growth. The commission feels that
the density numbers for high density growth areas should
be reviewed, so that current and future environmental
concerns stemming from growth can be addressed.
- C. Topic/Issue is/will be of importance:
- immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
- Proximity to the Great Egg Harbor River is
of concern as building increases in our area. As
the population in this area increases it will have a
(continue on back)
 - Traffic continues to become more of a
concern since travelers to shore areas pass
through our Township on Rts 40, 50, & 1322.
(continue on back)
 - The proposed Airport Expansion Project
at Atlantic City Airport at Pomona in a
area that is designated high density growth
(continue on back)

-over-

E. Related Issue(s), if any: Protection from forest fires
and access to property during fire. Traffic
congestion may prevent trucks from arriving to
fire quickly.

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

* DEC-17 10:27 609 625 2133 2:17 PM 4 OK *

* DATE START SENDER RX TIME PAGES NOTE *
* DEC-17-91 TUE 10:30 *
* TRANSACTION REPORT *
* P.01 *

1. Negative impact on the River.

3. raises concern since the airport and runways will be very close to residential areas. Flight patterns will be over these areas increasing noise and pollution.

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

Manchester Twp. Env. Commission

FILE COPY

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 1

A. Proposer (agency, name, etc.): Manchester Twp. Environment
Commission

B. Topic/Issue: solid waste

C. Topic/Issue is/will be of importance:

 immediately
 ✓ in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Municipalities in the Pinelands are limited
in their access to landfill. There are only a
few left in N.J. Other states are beginning to
(continue on back) close their landfills to out-of-state garbage.
2. Landfills will be in short supply. State or county
officials may look at Pinelands for additional landfill
sites, especially rural areas that have not been
(continue on back) revegetated.
3. As an alternative to landfill, counties may try
to locate incinerators or waste-to-energy
facilities in the Pinelands.
(continue on back)

4. Solid waste ^{-over-} transfer stations, while not
landfills, still have the possibility of
groundwater contamination and increase truck
traffic in the Pinelands.

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2

A. Proposer (agency, name, etc.): Manchester Twp. Environment
Commission

B. Topic/Issue: linear improvements and other
public development.

C. Topic/Issue is/will be of importance:

- immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. As the population of the Pinelands,
and especially the areas surrounding
the Pinelands, continues to grow, there will
(continue on back)

2. increased plans for new roads, widened roads,
sewerage infrastructures, cable installations,
etc. The criteria for public "need" should be
(continue on back)

3. reconsidered. Many times a need turns out
to be a want or a convenience

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

9/91
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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 3

A. Proposer (agency, name, etc.): Manchester Twp. Environment
Commission

B. Topic/Issue: Clearcuts on public land

C. Topic/Issue is/will be of importance:

immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Areas of public land in the Pinelands are
being clearcut. The clearcutting reduces wildlife habitat,
increases run-off, and looks ugly
(continue on back)

2. _____

(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____
- Olin-White - -NJ State Forester, Asst. Director
State Forest Service

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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 24

A. Proposer (agency, name, etc.): Manchester Twp. Environment
Commission

B. Topic/Issue: mining

C. Topic/Issue is/will be of importance:

immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. There are many sand and gravel
mining operations in the Pinelands
They should be required to revegetate
(continue on back)

2. and restore the property as mining is
completed.
(continue on back)

3. _____

(continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

9/91
CF4B



J. H. CRESSON
FORTY EAST SECOND STREET
MOORESTOWN, N. J. 08057

DEC 18 1991

December 11, 1991

N.J. Pinelands Commission
P.O. Box 7
New Lisbon, N.J. 08064

FILE COPY

Maureen, please bring this to the attention of the Commissioners ASAP
re: Issues facing future Pinelands research in archaeological
sampling and collection in buffer areas.

An issue of serious concern is the management, protection and scientific use of cultural resources in buffer, deed restricted and set-aside parcels after Pinelands approval. This circumstance serves to greatly impede historical and scientific research. Since little regulation and no protection or retrieval mechanisms exists for archaeological data inquiry after sub-division and individual property ownership an improved program needs to be implemented to both safeguard and sample these resources in the planning and application stages as well as after construction and individual property ownership.

My recommendation is first, to provide some legal and enforcement mechanisms with 'teeth' to prevent individual property owners from knowingly or unknowingly destroying cultural resources in these designated zones; second, to sample all sites of cultural use and resource found within these zones in stage I & II archaeological surveys and third, to establish a separate repository for Pinelands cultural resources for ongoing and future scientific research so a more uniform singular body of documents and artifacts are in one place.

An enormous potential exists for gleaning more direct, pristine and unfettered knowledge of Pinelands history and prehistory in these zones since most of the already known resources occur within 'wetland' buffers. As concerned and serious researchers we are overlooking a large body of data and research potential under the guise of 'protection' that in effect, to this day, denies purposeful, necessary scientific research from these neglected areas.

In essence, we are only getting a minute flicker of reflection through the window of the past in Pinelands history and land-use.

Respectfully submitted,

John H. Cresson

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): _____ LWUNJ - Natural Resources _____

Barbara Novick _____ 26 Lynn Dr. _____ Ocean, NJ 07712 _____

B. Topic/Issue: _____ transfer of development rights _____

C. Topic/Issue is/will be of importance:

_____ immediately in the short term (next 5 to 7 years) or; _____ longer term (beyond 7 years)

D. Reasons for Importance:

1. _____ (continue on back)

2. _____ (continue on back)

3. _____ (continue on back)

The CMP is a land use regulatory system which limits development in the environmentally sensitive parts of the Pinelands and at the same time it directs growth to more acceptable regional growth areas. The Pinelands Development Credit Program is one of the tools for facilitating this goal. Years of experience with this program have proven the need to more adequately ensure marketability of PDC's. We suggest that the Pinelands Commission study the advisability of reducing the density standards in regional growth areas as delineated in the CMP in order to create a greater demand for PDC's. Such a revision would surely make the program more effective and inturn make the work of the Pinelands

E. Related Issue(s), if any: see below

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____
 Budd Chavooshian _____
 Jack Ross _____

E. Related Issue

Staff contact time which will be required to facilitate changes in each of 30 municipal master plans. Perhaps changes could be made as each individual master plan comes up for mandatory periodic review - every six years.

Return form to:

Ms. Lois Cristarella
Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064
9/91
CP4B

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): Madford Township
Environmental and Open Space Advisory Commission

B. Topic/Issue: Enforcement of regulations to insure protection of
the important environmental areas.

C. Topic/Issue is/will be of importance:

X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)

D. Reasons for Importance:

1. Purposeful destruction of important areas does occur, perhaps
without realizing the critical nature.

(continue on back)

2. Damaged environment, whether on purpose or accidentally, can take
decades to restore, if ever.

(continue on back)

3. _____

(continue on back)

E. Related Issue(s), if any: growth continues in the Pinelands, and protected areas are always in jeopardy. So the balances of growth and protection of the environment is critical, particularly wetlands area which much development now borders.

F. Relevant Documentation (list and attach if available any reports, etc.):

G. Known Experts on Issue, if any:

9/91.
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PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

- A. Proposer (agency, name, etc.): Richard H. Kropp, Chief
Bureau of Water Allocation, DEPE

- B. Topic/Issue: Water Supply

- C. Topic/Issue is/will be of importance:
 X immediately
 X in the short term (next 5 to 7 years) or;
 X longer term (beyond 7 years)
- D. Reasons for Importance:
1. See Attached

(continue on back)
2. _____

(continue on back)
3. _____

(continue on back)

-over-

The Wharton Tract acquisition in 1955 was one of the first examples of direct state interest in water resource conservation. This purchase was to provide a ground water preserve for the future water supply needs of South Jersey. Forestry and recreational uses consistent with the primary purpose of protection and eventual development of its water resources were allowed by the Department of Conservation and Development.

The 1955 Survey of New Jersey Water Resources Development issued by the Legislative Commission on Water Supply identified the Kirkwood Cohansey aquifer as the primary supplemental source for Atlantic City and Camden in the event that the developed wellfields in those areas became contaminated by saltwater intrusion. Recent water resource investigations conducted by the United States Geological Survey and the NJDEPE indicate the threat of salt water intrusion has increased for both the Camden and Atlantic City water supplies.

In 1980, public policy regarding the Kirkwood-Cohansey aquifer changed and preservation efforts emphasized the ecosystem of the Pinelands Reserve over water supply development. This policy was solidified in the New Jersey Pinelands Comprehensive Management Plan adopted November 21, 1980. It stated that the exportation of ground or surface water from the Pinelands shall not be permitted. It also placed severe restrictions on the use of water within the Pinelands Reserve. The implications of this policy on the South Jersey communities that planned for decades to utilize the Kirkwood Cohansey water supply were not adequately reviewed or sufficiently discussed in the Plan.

The original and primary purpose of protecting this aquifer system over the last century has been to insure a safe and adequate water supply for the citizens of South Jersey. As salt water intrusion continues to threaten the health and safety of the residents of South Jersey, there is an increasing need to develop new water supplies. The Kirkwood Cohansey aquifer has always been considered to be the primary source of these supplies.

The Pinelands Comprehensive Management Plan has had profound implications on water supply planning and development in all of South Jersey. The Commission's review of the plan must review this impact and determine how to balance the water supply needs of the region with the preservation of the Pinelands ecosystem.

PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN '71

MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 2

- A. Proposer (agency, name, etc.): Daniel J. Van Abe, Ph.D., NIDEP

- B. Topic/Issue: Ground water quality protection - Pinelands water quality standards are very stringent and may conflict with unavoidable impacts of development in growth areas, authorized pursuant to the CMP. The Pinelands Commission should acknowledge and address the impact of nonpoint pollution sources on its nondegradation policy.

- C. Topic/Issue is/will be of importance:
 immediately
 X in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. Conflict between standards for development and standards for water quality in growth areas.

(continue on back)
2. _____

(continue on back)
3. _____

(continue on back)

-over-

E. Related Issue(s), if any: NJDEP initiative on beneficial reuse of
sewerage sludge and implications for Pinelands - Is using chemical
fertilizers a better alternative?

F. Relevant Documentation (list and attach if available any
reports, etc.): Attached are series of articles from the popular
press and a report from Pinelands Preservation Alliance recommending
public attention to this matter.

G. Known Experts on Issue, if any: Harry Motto, Rutgers University

Pinelands Commission Notation:

Supplemental material to this submission was not received
but has been requested, and will be on file at the Commission
available for review.

9/91
CP4B

**PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN**

**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # 1

- A. **Proposer (agency, name, etc.):** NJDEPE, Division of Science and Research

- B. **Topic/Issue:** Use of Soil Amendments in Pinelands Ecosystem

- C. **Topic/Issue is/will be of importance:**
 X immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. **Reasons for Importance:**
1. Citizens concern about restoration of mined sites using materials that might temporarily alter natural ecosystem but derive long-term benefits.
(continue on back)
 2. Citizens concern about perception that State sees Pinelands as a dumping ground rather than as a unique environment.
(continue on back)
 3. Confirmation or refutation of current agricultural and reclamation practices in Pinelands, including use of fertilizers and sludge derived materials through needed research. (e.g. what are actual nitrogen require
(continue on back) for plant communities in Pinelands).

-over-

E. Related Issue(s), if any: NJDEP initiative on beneficial reuse of
sewage sludge and implications for Pinelands - Is using chemical
fertilizers a better alternative?

F. Relevant Documentation (list and attach if available any
reports, etc.): Attached are series of articles from the popular
press and a report from Pinelands Preservation Alliance recommending
public attention to this matter.

G. Known Experts on Issue, if any: Harry Motto, Rutgers University

Pinelands Commission Notation:

Supplemental material to this submission was not received
but has been requested, and will be on file at the Commission
available for review.

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**PINELANDS COMMISSION REVIEW OF
THE PINELANDS COMPREHENSIVE
MANAGEMENT PLAN**

**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # 1

- A. Proposer (agency, name, etc.): NIDEP, Division of Science and Research

- B. Topic/Issue: Mercury in Coastal Plain Aquifers, especially in Potable Wells

- C. Topic/Issue is/will be of importance:
 immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. Low levels of total mercury have adverse health effects (>2.0 ppb). Important to determine source of mercury currently being detected (natural: anthropogenic - spill, landfill, etc.).
(continue on back)
 2. Ecological effects

(continue on back)
 3. If anthropogenic, may migrate to other wells.

(continue on back)

-over-

- E. Related Issue(s), if any:** Other contaminants which may appear with mercury in wells (e.g. VOCs).

- F. Relevant Documentation (list and attach if available any reports, etc.):** Atlantic County DOH has done numerous monitoring there DSR currently evaluating anal. technique to distinguish among mercury species in water.

- G. Known Experts on Issue, if any:** William Fitzgerald, Univ. Conn.;
Herbert Windom, Skidaway Inst. of Oceanography; John Dooley, DEPE, NJCS;
Randi DeMartini, Atlantic County DOH.

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PINELANDS COMMISSION REVIEW OF
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MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 3

- A. Proposer (agency, name, etc.): NJDEP, Division of Science and Research

- B. Topic/Issue: Groundwater Contamination (Nitrate)

- C. Topic/Issue is/will be of importance:
X Immediately
_____ in the short term (next 5 to 7 years) or;
_____ longer term (beyond 7 years)
- D. Reasons for Importance:
1. Nitrate may leach to groundwater from septic leach fields or from home/commercial use of fertilizers.

(continue on back)
2. Pinelands soil is sandy and acidic - "encourages" leaching plus water table is close to surface.

(continue on back)
3. _____

(continue on back)

-over-

- E. Related Issue(s), if any: Other chemicals which may leach with nitrate (depending upon the source) - pesticides, VOCs.
- F. Relevant Documentation (list and attach if available any reports, etc.): Nitrate in drinking water wells in NJ: Part I - Mercer and Burlington Counties and Part II - Ocean, Salem and Gloucester Counties.
- G. Known Experts on Issue, if any: David Baker, Heidelberg College, Tiffin, OH

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PINELANDS COMMISSION REVIEW OF
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MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW

RECOMMENDATION # 4

- A. Proposer (agency, name, etc.): NJDEPE, Division of Science and Research

- B. Topic/Issue: Ongoing concern about the water quantity issue in the Pinelands - both the hydrologic impacts of water withdrawal from the Kirkwood - Cohansey and potential ecological impacts.

- C. Topic/Issue is/will be of importance:
 immediately
 X in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. Significant water shortages could start occurring more frequently.

(continue on back)
2. Impact on agricultural operations in the Pinelands.

(continue on back)
3. May cause Wetlands to disappear.

(continue on back)

-over-

E. Related Issue(s), if any: Apparently, the Commission is already very interested in this issue, i.e., the need has been established, funding is the main problem.

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: _____

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**PINELANDS COMMISSION REVIEW OF
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**MAJOR TOPIC/ISSUE
RECORDED FOR REVIEW**

RECOMMENDATION # _____

- A. Proposer (agency, name, etc.): New Jersey Department of Environmental Protection and Energy, Science and Technical Programs. - Municipal Wastewater Assistance Element
- B. Topic/Issue: Interbasin and intrabasin transfer of water: what level of transfer is consistent with long term maintenance of Pinelands groundwater and surface water quality and quantity with attendant ramifications for the overall ecosystem and how will this be determined?
- C. Topic/Issue is/will be of importance:
- * _____ immediately
* _____ in the short term (next 5 to 7 years) or;
* _____ longer term (beyond 7 years)
- D. Reasons for Importance:
1. The stated policy of the Pinelands Comprehensive Management Plan is not to permit new facilities which export groundwater or surface water from the Pinelands. However, even facilities which short circuit the (continue on back) turn over please.
 2. Past decisions regarding wastewater treatment in Ocean and Atlantic Counties have resulted in the construction of several large regional facilities which discharge effluent to the ocean. As these facilities (continue on back) turn over please.
 3. The CCMA has continued to expand the service area of the Delaware basin treatment facilities to include increasingly large areas of the Atlantic drainage basin. Although interbasin transfer was permitted (continue on back) turn over please.

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): The Pinelands Commission undertook a study with regard to the referenced CCMIA project.

G. Known Experts on Issue, if any: _____

1. (cont'd) natural hydrology via long interceptors conveying wastewater to the ocean have the effect of interbasin transfer and should be scrutinized. Further, projects have been approved, with conditions, allowing for some interbasin transfer of water (most recently, Camden County MIA (CCMIA) Atlantic Basin project).
2. (cont'd) reach capacity and as new areas continue to develop, decisions will have to be made regarding the acceptability of continuing and/or expanding the use of these facilities. It will be necessary to develop a methodology and decision criteria to support this process as the needs arise.
3. (cont'd) to accommodate this project, a cap has been placed on the quantity of water which may be exported, subject to the results of a monitoring study. It will be necessary to determine what level of confidence will be required before determining that there has been/will be no adverse effect from the transfer before an informed decision can be made regarding requests to increase the transfer.

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**PINELANDS COMMISSION REVIEW OF
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**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # _____

- A. Proposer (agency, name, etc.): New Jersey Geological Survey,
Manny Charles, Principal Hydrogeologist
- B. Topic/Issue: Maintenance of ground-water recharge in all
areas of the Pinelands, especially in developed areas.
- C. Topic/Issue is/will be of importance:
_____ immediately
_____ in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. In many cases, ground-water recharge and maintenance of
ground-water levels are critical to the existence of
wetland plants and animals
(continue on back)
 2. Ground-water recharge is of primary importance to the future
ground-water supply of the population within and outside of the
Pinelands. Water quality remaining will be viable if recharge is not maintained.
(continue on back)
 3. Maintenance of ground-water recharge is essential for
agricultural water needs in the Pinelands
(continue on back)

-over-

- E. **Related Issue(s), if any:** 1) The quality of ground-water recharge in the Pinelands. 2) Any water quality issues in the Pinelands are strongly related to ground-water recharge issues. 3) Assessment of ground-water recharge on a regional basis requires an extensive database of land cover and soil types.
- F. **Relevant Documentation (list and attach if available any reports, etc.):** The New Jersey Geological Survey is well along in developing a methodology that can systematically estimate ground-water recharge into a variety of developed land surfaces as well as undeveloped land surfaces in the Pinelands. (abstract and references attached)
- G. **Known Experts on Issue, if any:** Murray Charles and Dr. Deborah, of the New Jersey Geological Survey, have developed the above methodology and can be contacted at (609) 984-6527. The United States Geological Survey is also knowledgeable on this issue.

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**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): NJDEPE - Science
and Technical Programs - New Jersey
Geological Survey - Robert Canace

B. Topic/Issue: Definition of natural hydrologic
systems, including: ambient water quality,
fluctuations in precipitation, stream flow
and ground-water levels

C. Topic/Issue is/will be of importance:

immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years).

D. Reasons for Importance:

1. The natural tolerances of Pinelands ecosystem
needs to be defined in order to be able to
assess changes and impacts of anthropogenic
(continue on back) Co.

2. _____

(continue on back)

3. _____

(continue on back)

-over-

- E. Related Issue(s), if any: Pinelands ground-water policy. Water-quality discharge standards. Dynamics of ecosystems.
- F. Relevant Documentation (list and attach if available any reports, etc.): "A hydrologic analysis of the New Jersey Pine Barrens Region" - (attached)
- G. Known Experts on Issue, if any: USGS-WRD. NTGS - Bureau of Ground-Water Resources Evaluation. Edward Rhoades (USGS)

Pinelands Commission Notation:

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influences. What are the cyclical variations in rainfall, streamflow and ground-water levels. What is natural water chemistry? What is natural ground-water recharge?

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PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

1. Proposer (agency, name, etc.): New Jersey Geological Survey

2. Topic/Issue: Development of a Natural Resource Inventory-The Pinelands contains extensive natural resources on which the State depends for future growth. These resources can be managed for multiple purposes, however, this requires a detailed inventory of resource types and distributions. The information should be compiled in a Geographic Information System which can accommodate analysis of numerous resource types including: water, geologic materials, wetlands, fauna, wildlife, etc.

3. Topic/Issue is/will be of importance:

 immediately
 x in the short term (next 5 to 7 years) or;
 and longer term (beyond 7 years)

4. Reasons for Importance:

1. Water Resources vary in quality and quantity both in the surface aquifers and the deeper systems. Geologic materials control the distribution of these water resources. An inventory would provide the means of defining the highest quality water resources.

(continue on back)

2. The distribution of surficial sand and gravel and its chemical composition controls the type of land use. Land used for agricultural purposes or for sources of construction materials is critical to the development of the State and must be protected for future growth. An inventory will facilitate this plan

(continue on back) and protection.

3. Clay resources are limited but critical for use as liners and caps for solid waste disposal facilities. These resources are required locally to provide the environmental safeguard against leaching of the waste and contaminant transport. An inventory would provide identification of these prime resources.

(continue on back)

Related Issue(s), if any: Conflicts in multiple purpose land use
could be more easily resolved once the total inventory is known and prioritized
as to the quality of that particular occurrence of the resource.

Relevant Documentation (list and attach if available and reports, etc.): 1) A copy of GSR25, Inventory of Sand and Gravel is attached.
2) Studies of clay resources are in progress at the NJGS. 3) Numerous water resource
studies are in progress and are planned for the future, and 4) Other DEPE agencies
have responsibility for other natural resources.

Known Experts on Issue, if any: Numerous DEPE agencies, New Jersey
Geological Survey, U.S. Geological Survey Water Resources Branch

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**MAJOR TOPIC/ISSUE
RECOMMENDED FOR REVIEW**

RECOMMENDATION # _____

- A. Proposer (agency, name, etc.): NJDEPE BUREAU OF
MONITORING MANAGEMENT
- B. Topic/Issue: IMPACTS OF FRESHWATER DIVERSIONS FOR POTABLE
USE FROM URBAN WATERSHEDS OF SUCH TIDAL RIVERS AS
MULLICA MANASQUAN MAURICE AND COHANSKY AND
GREAT EGS HARBOUR
- C. Topic/Issue is/will be of importance:
 immediately
 in the short term (next 5 to 7 years) or;
 longer term (beyond 7 years)
- D. Reasons for Importance:
1. WILL SALINITIES INCREASE IN TIDAL AREAS
(continue on back)
 2. WILL SPECIES AND HAB. CHANGES OCCUR
(continue on back)
 3. _____
(continue on back)

-over-

E. Related Issue(s), if any: None

F. Relevant Documentation (list and attach if available any reports, etc.): None

G. Known Experts on Issue, if any: _____

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JAN. 9 1992



TOWNSHIP COMMITTEE:
JAMES J. McCULLOUGH, MAYOR
MARIA BOHLE, DEPUTY MAYOR
BOB BURNS
JOHN HEINZ, JR.
JEROME STAMBLER

TOWNSHIP OF EGG HARBOR

R.D. #2A BOX 262 • BARGAINTOWN ROAD
EGG HARBOR TOWNSHIP, N.J. 08221-9621
609-927-5000

TOWNSHIP OFFICIALS:
PETER J. MILLER, ADMINISTRATOR
PATRICIA INDRIERI, RMC, CLERK
CHRIS REHMANN, ENGINEER
MICHAEL SCHREIBER, SOLICITOR

January 7, 1992

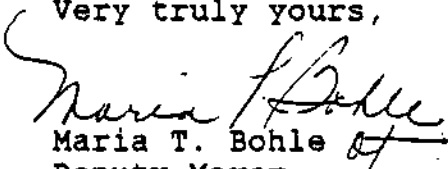
Ms. Lois Cristarella
The Pinelands Commission
P O Box 7
New Lisbon, New Jersey 08064

Re: Review of Pinelands Comprehensive Management Plan

Dear Ms. Cristarella:

Enclosed herein please find my comments on the above-referenced Plan. Please excuse my lateness in not getting these comments to you as required by December 13, 1991.

Very truly yours,


Maria T. Bohle
Deputy Mayor

Enclosure

JAN. 9 1992

PINELANDS COMMISSION REVIEW OF THE PINELANDS COMPREHENSIVE MANAGEMENT PLAN

MAJOR TOPIC/ISSUE RECOMMENDED FOR REVIEW

RECOMMENDATION # _____

A. Proposer (agency, name, etc.): MARIA BOTLE -

B. Topic/Issue: Water issues - potable water supply and water recharge ~~etc~~ Regional drainage basins or basin planning vs onsite basins -

C. Topic/Issue is/will be of importance: All immediately in the short term (next 5 to 7 years) or; longer term (beyond 7 years)

D. Reasons for Importance: 1. The water cycle has been interrupted by development area, over drawing groundwater reserves + lowering recharge areas through sewer lines (continue on back) + impervious surfaces. 2. (continue on back) 3. (continue on back)

-over-

E. Related Issue(s), if any: _____

F. Relevant Documentation (list and attach if available any reports, etc.): _____

G. Known Experts on Issue, if any: Claude Epstein, hydrologist
@ STOCKTON STATE COLLEGE ✓

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