



PINELANDS PRESERVATION ALLIANCE

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September 24, 2008

Mr. John C. Stokes, Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

**Re: Monroe Township
Master Plan Reexamination Report
Supplemental Testimony of the Pinelands Preservation Alliance**

Dear Mr. Stokes:

The Pinelands Preservation Alliance (PPA) would like to submit the following written comments, to supplement our oral testimony given at today's hearing. These comments relate specifically to Section C. (pages 7 to 12) of the report.

This report recommends that the Diamond Lakes community, located in a Rural Development Area of the Pinelands, be serviced with a public centralized sewer system. Since centralized wastewater treatment and collection facilities are prohibited in Rural Development Area's of the Pinelands, this section is not consistent with the Comprehensive Management Plan (CMP) and should be removed before the Commission takes final action on this Reexamination Report. Allowing this section to remain in the report, would not only be misleading, but is in direct contradiction to the CMP.

In the report, an analogy is made between well water contamination associated with Victory Lakes and Timber Lakes, and what *could* happen at Diamond Lakes if the area is not serviced with sewer. This is speculation only and not supported by facts. The report makes no mention of any documentation to support such a claim, nor is it stated that a public health concern exists. The CMP in section 7:50-6.84(a)(2) provides municipalities the opportunity to bring centralized sewer into a Rural Development Area once a public health problem has been documented. Monroe can always exercise this option in the future once it can justify the need.

The Reexamination Report also recommends that the Wastewater Management Plan (WMP) be updated to include Diamond Lakes. For the same reason identified above, Commission staff, commenting on the Gloucester County Water Quality Management Plan (WQMP), has recommended removing Diamond Lake as a proposed sewer service area (See Attached).

“In another case, an area has been included in the Sewer Service Area because the Township intends to document a public health problem. Since that documentation has yet occurred and the Commission approval has not yet been granted to the proposed management area changes, staff recommends that the Sewer Service Area changes proposed in the WQMP be removed from the current update.”

Since Commission staff have already identified that the placement of centralized wastewater collection facilities in the Diamond Lakes community is inconsistent with the CMP, we recommend that the Commission not approve the report with the current references to Diamond Lakes.

Should you have any questions, we can be reached at (609) 859-8860.

Respectfully Submitted,

Richard G. Bizub
Director for Water Programs

Theresa Lettman
Director for Pinelands Commission

Encl: