



PINELANDS  
PRESERVATION  
ALLIANCE

Bishop Farmstead  
17 Pemberton Rd  
Southampton NJ 08088  
609-858-8860

[ppa@pinelandsalliance.org](mailto:ppa@pinelandsalliance.org)  
[www.pinelandsalliance.org](http://www.pinelandsalliance.org)

March 25, 2024

Jacquelyn A. Suárez  
State of NJ Department of Community Affairs  
101 South Broad Street  
PO Box 800  
Trenton, NJ 08625-0800

Re: Review of Ordinance 24-02 Adopting the Redevelopment Plan for Block 62, Lots 30 & 31.01 (non-condemnation)

Dear Acting Commissioner Suárez,

We request that the Department of Community Affairs review the Manchester Township Redevelopment Plan adopted through ordinance 24-02 and not grant approval of the Township's determination that this area is in need of redevelopment. This is another example of the perverse way that redevelopment provisions of the municipal land use law are being abused. Allowing the 'redevelopment' of undeveloped land undermines the intention of the law to incentivize the revitalization of derelict land that is truly in need of redevelopment. This particular plan for 224 acres of Pinelands land epitomizes the problems with our current redevelopment laws, as the northern portion of the property that was previously disturbed as a resource extraction site (lot 31.01) will be preserved, while the untouched forested portion of the site (primarily lot 30) will be 'redeveloped'. This plan to develop via deforestation in lieu of actual redevelopment is a farcical exploitation of New Jersey's laws. The DCA should not approve this plan as redevelopment, and should close the loopholes that allow the widespread abuse of redevelopment laws in New Jersey.

At the very least, this plan should not be granted the benefits that accompany a redevelopment designation, because developers should not be given incentives to destroy undeveloped forests. The developer was likely advised to avoid the mined area altogether to simplify the approval process. There are threatened & endangered species concerns associated with the former resource extraction site: the patchwork of open fields, sandlots, and trees has created attractive nesting habitat for pine snakes. However, a thorough enough study would likely reveal the intact upland forest that is adjacent to the former mines to also be critical habitat for these snakes. Focusing development on the forest ignores

the critical habitat value for hibernation that the adjoining upland mature forest also provides for the population of the threatened snake species. A thorough study of this population has yet to be done. The upland forest should not be sacrificed to compensate for the more apparent limitations of the former extraction site.

This redevelopment plan is part of a troubling trend in southern New Jersey, whereby redevelopment is often used to target undeveloped forests, while truly derelict properties sit unused nearby. Please revisit our October 10, 2023 letter concerning a similar abuse of the redevelopment law in Pemberton Township. The current manifestation of the law is just a giveaway to developers that sacrifices both the environment and smart growth principles. Please change the redevelopment law to restore its originally intended function to revitalize New Jersey communities, starting with the revocation of Manchester Township Ordinance 24-02.

Sincerely,

Heidi Yeh, Ph.D.  
Pinelands Preservation Alliance

Emile DeVito, Ph.D.  
New Jersey Conservation Foundation