



PINELANDS PRESERVATION ALLIANCE

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August 7, 2012

Mayor Peter Bylone
Buena Vista Township
890 Harding Highway, PO Box 605
Buena NJ, 08310

Dear Mayor Bylone:

We are writing to clarify an important point that has come up during the creation of the new Wastewater Management Plan (WMP) for Atlantic County's Pinelands municipalities. Specifically, it is important that your Township understand it is *not* legally obligated to agree to the inclusion of your Pinelands Villages – Richland Village, Newtonville, Collings Lakes, and Milmay – in expanded Sewer Service Areas.

On July 19, Atlantic County's Department of Regional Planning and Development sent a letter to Buena Vista Township asking the Township to pass resolutions approving the Sewer Service Area extensions built into the County's proposed WMP. The WMP proposes to include all the Pinelands Villages in new Sewer Service Areas.

The idea of expanding Sewer Service Areas to include all Pinelands Villages seems to have come out of a Memorandum of Understanding between the Pinelands Commission and the Department of Environmental Protection (DEP) designed to coordinate DEP's review of the new WMPs with the Pinelands Comprehensive Management Plan (CMP). Some people appear to read this MOU to *require* that municipalities agree to include Villages in new Sewer Service Areas. We believe this is not the case.

Throughout its life, the Pinelands CMP has *permitted* Pinelands Villages to be sewered if a municipality wanted it to be and the sewerage met CMP standards for Villages. Among these standards is that for any land use, including use of sewers, "The character and magnitude of the use is compatible with existing structures and uses in the Village" NJAC 7:50-5.27(a). The CMP has never required municipalities to permit sewers in all Villages, and nor does or could the recent MOU with DEP impose such a mandate.

In most cases, Pinelands Villages have not been sewered or included in Sewer Service Areas, and this is perfectly consistent with the CMP. Indeed, the intensive development that sewers may attract could be harmful to many Pinelands Villages, changing the character of the Village, raising property prices, and leading to higher property taxes for existing residents, among other impacts. Whether or not to sewer a Village needs to be judged on a case-by-case basis, with input from the community, in light of the character, history and likely changes in each particular Village.

Our view is that Buena Vista's four Villages are not appropriate places for sewer development. While sewers can improve water quality when compared to septic systems, they also tend to attract much more intensive development that is not appropriate to long-established rural Villages like these. The water quality benefit of sewerage a Village, moreover, may easily be offset and exceeded by the additional water quality harms that come with intensive development.

Sincerely,

A handwritten signature in black ink, appearing to read "Carleton Montgomery". The signature is fluid and cursive, with the first name "Carleton" written in a larger, more prominent script than the last name "Montgomery".

Carleton Montgomery
Executive Director