

New Jersey Highlands Council **Letter 93**

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Pinelands Preservation Alliance (PPA) wishes to endorse the detailed comments submitted by the NJ Highlands Coalition and to emphasize ___ basic themes for the Council's consideration. PPA has been working to support and improve the Pinelands regional planning program for more than 25 years and has gained unique experience in understanding both the opportunities and the pitfalls in regional planning for natural resource conservation in New Jersey. 1. Keep your eye trained on protecting the forests. The most important outcome the Highlands RMP can achieve is to protect all of the region's surviving forests, because the forests are the unifying thread that sustains the water supply, the critical habitats of the region's plants and wildlife, and the recreational and scenic values for which the Highlands Council exists. Every acre of forest lost is a blow to each of these values, no matter how well-designed is the development takes its place. 2. Complete and reliable data is essential to implementing the RMP's standards and policies. It is impossible to rationally implement development standards and regional policies without good data on factors like the presence and needs of rare species, dynamics of wetlands and streams in response to climate change and land use change, and changes in the level of contaminants like nutrients in water bodies. Most of this data must be collected by applicants and other state and local agencies, rather than the Council. It is essential that the Council have an integrated program that ensures needed data will be collected and reported on an application-by-application basis and a regional-wide basis. 3. Transfer of development rights program. The Pinelands Development Credit program has been successful over its long term because the Pinelands Comprehensive Management Plan provides for mandatory receiving areas and development situations that require the purchase of rights in order to win approval, which municipalities cannot override. If the Highlands program is ever to work in providing value to landowners and preserving land in sending areas, it cannot rely on municipal governing bodies to take the lead or unilaterally agreeing to create receiving areas and required uses of credits. Most municipal governments will be intimidated by the complexities of these programs or will not have the continuity of leadership over time to make them work. 4. Transparency of the Council's operation is critical: The Pinelands Commission has gotten itself into trouble with the law and the public because it has gradually eroded the transparency for which it historically was known. The Commission does more and more of its work through deals negotiated outside the procedures established by the CMP, keeps key communications out of the public files, and discourages public participation. These actions only lead to embarrassment for the agency and unnecessary legal entanglements for applicants. The Highlands Council should not take this course, but should increase its transparency and respect for public comment and participation.

Respondent

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