



*PINELANDS PRESERVATION ALLIANCE*

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May 17, 2005

Danielle Stevens  
New Jersey Office of Smart Growth  
Department of Community Affairs  
101 South Broad Street  
PO Box 204  
Trenton, NJ 08625-0204

Re: Plan Endorsement Petition  
Township of Ocean, Ocean County

Dear Ms. Stevens:

We have reviewed the December 22, 2004, petition for Plan Endorsement that has been submitted by the Township of Ocean, Ocean County. Pinelands Preservation Alliance continues to be concerned with the new development area that is North of Well Mills Road (County Route 532) and west of State Highway 9.

Under the Pinelands Comprehensive Management (CMP) plan this 460 acres is divided between a Pinelands Rural Development Area and Regional Growth Area. The State Planning map is noting a purposed change to a large portion of this area from a Fringe Planning Area (PA3) to Suburban Planning Area (PA2).

Although the previous PA3 area did not reflect the portion of Pinelands Regional Growth Area immediately adjacent to the Rout 532 corridor, this expanded PA2 allows for the higher density of development to encroach too deeply into the forested area where many State endangered species have been documented. These changes would place the State Planning map in conflict with the Pinelands CMP.

The Pinelands Commission staff recently completed a report entitled "The Essential Character of the Oyster Creek Watershed" which presented updated information about the watershed and the 460 acres north of Wells Mills Road. Page 13, of this report list the 16 occurrences of threatened and endangered

species in this area making a large portion of this area not suitable for a PA2 or a PA3 designation.

During the spring, summer and fall of 1999, 2000, 2001 and 2002, The Academy of Natural Sciences did environmental studies along Oyster and Waretown Creek (copies attached). These studies support the Pinelands Commission report for both water quality and document the threatened and endangered plant species populations within the watersheds.

PPA supports the Environmentally Sensitive Planning area designation to be extended south of Oyster Creek. Under Waretown's Plan Endorsement Petition, PA-3 acreage will be used for new intensive development without protecting any environs as open lands. The use of PA3 designated lands, lands which are known endangered species habitat, to accommodate new, intensive development is counter to the purposes of state plan policy for a PA-3 area.

It has also been documented that there is a population of northern pine snake, a state threatened species, in the upland portions of this 460 acres. If the Plan Endorsement Petition submitted by Ocean Township is approved without a corresponding increase in the area designated as environmentally sensitive, the approval would cause an unwarranted loss of sensitive, endangered species habitat.

Thank you for your time and attention to our concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Theresa Lettman".

Theresa Lettman  
Director for Monitoring Programs

cc: William Harrison, Office of Smart Growth  
Larry Liggett, Pinelands Commission  
Daniel VanPelt, Mayor, Ocean Township