



AMERICAN LITTORAL SOCIETY

4 West Commerce Street, Bridgeton, NJ 08302

**The City of Millville: Wawa Tract
Phased No.1 development plan
Matt Blake, Manager, Delaware Bay Program**

PUBLIC TESTIMONY

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The 395 acre Wawa Tract represents a top conservation priority in the state, and we cannot support developing 86 acres of it without some assurance that a majority of 310 acre remainder will be preserved. This has not happened as evidenced by the fact that the city is already discussing allowing an undetermined amount of residential development here.

In addition, we find that the rezoning approach risks placing the remaining 310-acres under increased threat of development with even less open space than the former Matzel & Mumford plan.

Therefore, we cannot support rezoning 86-acres of lake-buffer for commercial use.

At the Planning Board hearing in August, both local residents and environmental groups shared the concern that the proposed piecemeal rezoning strategy would effectively give away the city's leverage to negotiate a land deal that adequately protects Union Lake for current and future generations.

We're also concerned that the proposed major new road through the eastern spine of the tract will only facilitate development of the remainder as supported by the fact that Wawa's Concept Plan ties directly into it. One road begets another and without any protection strategy in place for phase 2, we're concerned this is a case of putting the camel's nose under side of the tent.

Another major concern is that the phased approach would reduce the size of the Lakeshore Conservation District, which currently requires a meager 40% open space for new development.

This could easily result in far less open space than that originally required of the Matzel & Mumford plan that was so unpopular with residents.

For example, the former plan would have preserved 162 acres, while Wawa's Concept Plan only offers 119 – far less than the 300 acres we urge all parties to embrace.

Indeed, many contemporary cluster ordinances require 65% or more open space – does Union Lake deserve any less? Unfortunately, rather than proposing to bump up the open space set-aside, the phase 1 plan proposes to whittle it down.

We strongly believe that what happens to these 86-acres will have far-reaching impacts on the remaining tract. It seems the only way to assure that the various pieces of an ultimate layout come together in the best possible way and with the least adverse impacts to the environment and to traffic is to plan everything out together (see how each use fits together) and not rush.

We understand the city's desire to utilize a two-step rezoning approach so it can move quickly to bring future hotel development on-line (I get it), but it should take the time necessary to more carefully look at the issues being raised to avoid any serious unintended consequences and create a better plan that is more inclusive of public input and environmental concerns.

For example, have you done any studies to assure that in creating a commercial strip along the proposed new road that it won't reverse efforts to revitalize underutilized sections of Route 47 where there is ample room for infill and redevelopment?

I say this because it would be a real shame to see all this future development and investment needlessly leapfrog away from the downtown, existing commercial areas and infrastructure (where redevelopment and infill make sense) at the expense of a critically important forest which serves as a vital buffer and habitat for Union Lake.

For example, the majority of the tract is designated by DEP as having one of the highest rankings for supporting threatened species in the state. This important designation helps explain why the entire tract is not considered part of the future sewer service areas by the DEP. As a result the city's rezoning plan runs contrary to the state wastewater management plan regulations, which were created to protect resources like Union Lake.

Equally important are the millions the public has invested into Union Lake on dam re-construction, environmental clean-up, restoration and acquisition – public investments, which the city should steward - not squander.

All this suggests that there is a broader public interest in preserving as much of the Wawa Tract as possible for environmental protection, shoreline access, trails, fishing, picnic areas and scenic enjoyment.

We don't see how locating big-box superstores, offices and ball field-sized parking lots with all their resultant stormwater run-off represents the highest and best use of an environmentally sensitive public asset and treasure.

We and our colleagues still hope the Wawa Corporation will consider selling the entire ecological gem to Green Acres to expand the Union Lake Wildlife Management Area for environmental protection and the outstanding recreational opportunities this land would provide to residents and visitors alike.

Recognizing that 86 acres of the 395 acre green gem now seems destined to be clear-cut and paved-over, the Littoral Society remains willing to offer conditional support so long as it is limited to those 86 acres.

That support however, is contingent on the city taking concrete steps to preserve what remains and we don't see how the phased development approach gets you there.

We therefore urge you to not approve this plan, and take a step back and look at the tract in its entirety (and how beautiful it is) before making decisions that might irrevocably destroy one of South Jersey's, and your residents' greatest natural and recreational treasures.

Thank you