

August 1, 2012

Gene F. Feyl, Executive Director
Highlands Water Protection & Planning Council
100 North Road (Route 513)
Chester, NJ 07930-2322

RE: Washington Township (Warren) Draft Wastewater Management Plan Comments

Dear Mr. Feyl,

Thank you for the opportunity to review the Washington Township (Warren County) draft Wastewater Management Plan (WMP). As you may be aware, Washington Township is embarking on a more integrated approach to its Highlands Plan Conformance tasks and views this draft WMP as the backbone for all future planning in the Township. The Township is simultaneously evaluating plans to prepare accompanying documents such as the Ag Retention Plan and Centers Designation Feasibility Study. The adopted WMP will provide essential data for these studies and plans. As such, the Township's consulting engineers, Finelli Consulting Engineers (FCE), provided a cursory comparison of the Township's Interim WMP prepared on May 19, 2010 by FCE (Attachment A), with the existing and future sewer service area maps provided in the Highlands Council WMP. Our comments on the draft WMP are as follows:

1. The sheet size of the plans makes review of details difficult. We recommend that typical plan sheet sizes of 24" x 36" or 30" x 42" be provided in order to permit an acceptable resolution of the information for review purposes.
2. The previously submitted Interim Wastewater management Plan (Wastewater Service Area Map and Water Purveyors Map) should be reviewed and coordinated with the Highlands Council. See Attachment A.
3. The plans should show the location of the Washington Borough STP, the points of connection from the Interim WMP and the FSSA of the Washington Borough STP in Washington Borough.
4. The entire Warren County Community College parcel (Block 69, Lot 1) should be included as the service area for the facility on Figure 2.
5. Show the Warren County Vo-Tech School in Franklin Township (Block 16.01, Lots 1, 2, 3, and 9.01) on Figure 2 as being within the service area of the Warren County Community College.
6. Show the entire Warren Hills Regional High School parcel (Block 38, Lot 17) within the FSSA of the Washington Borough STP.
7. Developable non-residential parcels which have the potential based upon zoning to generate sewage flows of more than 2,000 gpd should be identified and placed in an appropriate service area of Figure 2. Service areas could be either the Oxford or Washington Borough service areas or a Septic System Area with Planning Flows greater than 2,000 gpd.

8. Developable residential parcels which are zoned for planned development and required a community septic system should be identified and included on Figure 2 within a service area for Septic Systems with Planning Flows greater than 2,000 gpd.
9. Figure 2 should differentiate between existing and future sewer service areas of the Washington Borough and Oxford systems.
10. Figures 1 & 2 should show pump stations and force mains.
11. Page 15 of the WMP indicates that the Brass Castle Highlands Center, the Port Colden Center and the Washington Township South Center are included in the future sewer service area of the Washington Borough STP and shown on Figure 2. Figure 2 does not show these areas. The Brass Castle and Port Colden Centers discharge to the Washington Borough STP. The Washington Township South Center discharges to the Washington Borough STP (north end) and to the Hawk Pointe Golf Community DGW system (south end).
12. Review the FSSA of the Hawk Point Golf Community.
13. Show the Discharge Category (A, GW, or T1) for each service area on Figure 2.
14. The Township Interim WMP should be reviewed. There are several parcels along the Washington Township / Washington Borough boundary that are connected to the Washington Borough STP which are not included in the existing sewer service area on Figure 2.
15. The Township's Interim WMP included three (3) potential sewer service areas from an older previously adopted WMP – the Pequest sewer service area, Pohatcong sewer service area and the Musconetcong sewer service area. The parcels within these areas should be reviewed and included in either the Washington Borough FSSA, the Oxford FSSA, or in a Septic System Area with Planning Flows greater than 2,000 gpd. It appears that a majority of these areas are within the Highlands Existing Community Zone.
16. Further review of the means of discharge should be conducted so as to avoid surface water discharge to Category 1 streams such as the Pohatcong River and the Furnace Brook.
17. Replace the Ringwood Plaza NJPDES Permit No NJ0032395 in the legend on Figure 1 & Figure 2 with what appear to be Hawk Pointe Golf Community NJPDES Permit No. NJ0136336.
18. Replace the Ringwood State Park NJPDES Permit No. NJ0091278 in the legend on Figure 1 & Figure 2 with what appear to be the Brass Castle Elementary School site NJPDES Permit No. NJG0105571.
19. There are several other parcels on the Interim WMP which do not appear on Figure 2:
 - a. Our Lady of Fatima Blue Army Shrine
 - b. Lakeland Parks STP
 - c. Canway Corporation
 - d. Brass Castle Stores STP
20. The feasibility analysis and study for the three proposed center designation areas will need to be reflected within the planning documents.

In summary, there are a significant number of items that need to be addressed for accuracy and future planning. We would welcome the opportunity to discuss an extension of time and an increase in budget at your earliest convenience. It will be important for the Township's forthcoming planning efforts. Please contact me if you need any further information and we will follow up with your staff on these requested extensions. I can be reached at (908) 689-7204.

Sincerely Yours,

Peter DeBoer, Administrator
Township of Washington
Warren County