



PINELANDS PRESERVATION ALLIANCE

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September 28, 2012

Candace McKee Ashmun  
Chair, Plan Review Committee  
NJ Pinelands Commission  
PO Box 359  
New Lisbon, NJ 08064

**Re: Plan Review 2012 Comments Regarding Pinelands Forestry**

Dear Commissioner Ashmun,

Pinelands Preservation Alliance (PPA) is submitting comments in response to some public comments given to the Commission during the Plan Review process. We would like to address the suggestion put forth by some foresters and organizations that forestry be re-classified from “development” to “agriculture” under the rules of the CMP. Such a change would eliminate review of forestry plans by the Pinelands Commission. PPA believes that the review of forestry proposals must remain under the jurisdiction of the Pinelands Commission and that the definition of forestry in the CMP should not be changed from development to agriculture.

The Pinelands Commission must retain its authority and not change the definition of forestry in the CMP for the following reasons:

1. Forestry activity is occurring in the Pinelands and the rules as adopted in 2009 are working. In 2011, the application activity schedule posted by the Pinelands Commission showed consistent activity every month on forestry applications – private and public, with over 100 line items noting forestry activity.
2. Review of forestry proposals is necessary to protect the Pine Barrens’ unique forest resources from:
  - plantation-style, agricultural forestry,
  - conversion and fragmentation of forest to non-forest habitat such as fields,
  - mechanized destruction of the native soil and root zone,
  - and replacing native forests with non-native species,

All of which convert and/or destroy critical and unique Pine Barrens habitats. The new 2009 Pinelands Commission forestry rules, endorsed by the NJDEP, forestry professionals, and conservation advocates, were intended to ensure that private and public forestry perpetuates native forests, regardless of who is doing the work or profiting from it.

3. Public notice and scrutiny is essential to ensuring forestry sticks to these rules. The DEP is not equipped to notify the public about public or commercial forestry applications. In contrast, the Pinelands Commission has a system that allows the public to see all development applications and to speak directly to the Commissioners on public development applications.
4. The DEP currently does not support the requirement for independent 3<sup>rd</sup> party certification by the Forest Stewardship Council for forestry on public lands, including our State Parks and Forests. This is highly unfortunate, but a reality that must be taken into account when considering the possible consequences of removing Pinelands Commission review of state forestry operations in the Pinelands. National, regional, and nearby state efforts all endorse long-term, landscape scale planning, stewardship, and restoration of our public forests. Forest Stewardship Council 3<sup>rd</sup> Party certification rules and standards provide assurance that public trust resources will be stewarded via an open public process and the implementation of stewardship activities founded upon science-based criteria. In rejecting these standards for our public recreational and natural resource lands, DEP signals that it does not consider adhering to such protective practices is among its current priorities or policies.

The arguments for redefining forestry as agriculture from those that have put forth this suggestion include the assumptions that (1) forestry activities do not result in a “change in use” of the landscape and (2) forestry activities are necessary for maintaining “forest health” in the Pinelands.

Regarding the argument that development results in a land use change but forestry does not, whether this is true depends on the details of each specific forestry plan. For example, forestry involving the clear-cutting of pitch pines and shrub oaks, and replanting with loblolly pines, results in a change in land use from a native forest to a plantation. Forestry involving herbicide application to shrubs and herbaceous plants in order to limit competition with target timber trees results in a change in land use from a native forest to what is essentially a tree farm. In fact, any forestry plan that has as its main priority the growing, harvesting, and sale of wood products results in a land use change from that of a native forest to land meant to turn a profit. The CMP’s forestry rules are designed to prevent such change in use and are necessary to protecting the region’s native forests.

Regarding the argument that forestry activities are necessary for maintaining “forest health,” we would first need to define “forest health.” An ecologist may define “forest health” as the ability of a forest to sustain natural ecosystem processes, functions, and native biodiversity, and to have high resistance or resilience to disturbance. A forester may define “forest health” in the

same way. Alternatively, a forester may define “forest health” as a forest’s capacity to quickly produce big trees of high commercial value – a property which has no necessary correlation with the ecological functions that define forest health. These ecosystem functions are best maintained by combinations of preservation, conservation, active management, and restoration that are both site- and species-specific. For example, in an area in which the desired vegetation structure is early successional habitat, then a management program of selective thinning and prescribed burning may be warranted. In an area in which the desired function is long-term carbon storage in an old and highly developed soil root system and to serve as habitat for interior forest species, then a management program of leaving the forest alone to function as it has long before intensive human involvement may be warranted. Clearly, forestry is not necessary to maintain all forms of “forest health” in all situations, and Pinelands ecosystems are not necessarily dependent upon forestry. Additionally, modern forestry is very different from traditional forestry. Powerful modern machinery and chemicals can do significant damage to native forest systems and have the potential to result in irreversible adverse impacts.

When considering the reclassification of forestry as agriculture, keep in mind that the primary goal of agriculture is not sustaining ecosystem processes, functions, and native biodiversity. Instead, the goal is the cultivation, harvesting, and sale of select plant products. Agriculture seeks to minimize biodiversity by favoring the growth of one or few target species, which is clearly not intended to occur in Pinelands forests under the CMP. It is not *agriculture* that preserves and protects Pinelands habitats and native species.

While forestry plans *can* be executed with beneficial ecological impacts, this is not inherent in all forestry plans. It is very easy for forestry activities to be destructive toward ecosystem structure and function through the degradation of soils and soil biota, chemical pollution through the application of fertilizers, pesticides and herbicides, the intentional elimination of plant species that are not the target product species, the introduction of non-native species, etc. This is why it is necessary for forestry plans to stay within the jurisdiction of the Pinelands Commission – to ensure that forestry in the Pinelands does not have negative ecological consequences.

Thank you for your consideration of our comments.

Sincerely,



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