

**Pinelands Commission Meeting  
December 9, 2011**

**Comments on:  
PSE&G Gas main installation linear road project  
Application #1986-0122.020**

This recently completed project involved the installation of 9,736 linear feet of an eight-inch gas main within the routes 70 and 72 rights-of-way in Pemberton and Woodland Townships. This project is located partially in the Pinelands Preservation Area District and partially in a Pinelands Forest Area, and was approved by the Commission at the May 13, 2011 meeting.

This project was completed several weeks ago. I drove by this site in early November, and pulled over to look at the new grass that had sporadically germinated along the disturbed soil area. I saw that while there was very little grass cover along the roadway, there was a dense path of germinated grass that had clearly been carried by water flowing down-slope away from the roadway. I followed this path of germinated grass into the woods adjacent to the road and found that the grass was establishing itself along the flow path, 240 feet into the interior of this forest, which is in the Pinelands Preservation Area. Also, there are wetland areas within this forest.

I wanted to bring this to your attention today as an example of how disturbance is not always restricted to the specifically delineated proposed disturbance area. In this case, the applicant said they would be disturbing "one to three feet" from the edge of the road paving, and a Pinelands Commission letter says that the "proposed gas main will be located a maximum of four feet from the edge." Clearly, the intrusion of this disturbance extends much further into the woodland... 60 times further. And although we can only see the *grass* that has been carried into the woods, this indicates that any sort of fertilizers, chemical soil amendments, lime, and seeds of non-native plant species included in the planting mix would also have been carried along this same path, into the Pinelands Preservation Area.

A few more points to consider:

1. The Commission's letter regarding this application says that "there are freshwater wetlands located immediately adjacent to the proposed development. No development is proposed in freshwater wetlands." And that "The applicant has demonstrated that the proposed development will not result in substantial impairment of the resources of the Pinelands." Although no development was proposed in wetlands, here we see that the effects of development expand beyond the extent of the primary disturbance.
2. A survey for the presence of threatened or endangered species was not required based on site conditions and the extent of the proposed development. Again, by unintentionally disturbing a greater area than planned, there is the risk that surveys for rare species do not consider these extended disturbances.
3. One of the approval conditions was that "silt fencing, hay bales or other appropriate measures shall be installed prior to construction to preclude sediment from entering freshwater wetlands and shall be maintained in place until all development has been completed and the area has been stabilized." During my visit, I did not see any of these measures to preclude sediment migration. I don't know whether such measures had already been removed from the site or had not been used at all, but clearly they did not accomplish their goal in this situation.

I would like to ask that the Commissioners keep this example in mind when considering development projects – even those that we would not expect to create more disturbance than is proposed. Little by little, the encroachment of this sort of disturbance into undeveloped Pinelands areas has the potential to alter characteristic Pine Barrens ecological communities.

Respectfully submitted,

Amy Karpati, Ph.D.  
Pinelands Preservation Alliance