

**Pinelands Commission Meeting
December 9, 2011**

Comments on:

**Commission's Approval Letter (dated 11/23/2011)
in response to NJ DEP Forestry Application #2011-0091.001**

This application by the NJ DEP would allow the cutting and harvesting of 12 acres of loblolly pine and white pine within a southern pine beetle-infested plantation in Wharton State Forest, with the goal of stopping the spread of the SPB into surrounding forest areas. In this application, the DEP also proposes to encourage loblolly pine and white pine seedling regeneration from these harvested parent trees by performing minor ground scarification and possibly applying herbicide to competing brush. If regeneration were to fail, replanting of these same two pine species is proposed. So in addition to attempting to suppress the spread of the SPB in this area, a secondary goal is to keep this 12-acre area as a plantation of loblolly pine and white pine for the sake of historic preservation.

I would like to commend Ms. Wittenberg and the Commission for their decision and response letter to this application. The Commission's approval allows for the cut and harvest of the pine trees on this plantation *only* on this one-time basis, and questions the necessity of subsequent scarification, herbiciding, and replanting for the sake of preventing danger to life, health, or safety.

Pinelands Preservation Alliance also questions the necessity of scarification, herbiciding, and replanting of these tree species which do not naturally occur in this forest area. White pines have been known to spread from these sorts of plantations into the surrounding native forest, though they are killed by wildfires. The SPB is known to have a very high preference for loblolly pines, so it is no surprise that it would attack a loblolly pine plantation. Replanting with loblolly pines includes the risk that this plantation might serve as a source site for future SPB outbreaks as trees mature over time.

We also question the historical significance of this plantation. "Historic" in what context? To highlight historical intent to turn Pine Barrens forest into plantations for economic gain?

We would encourage the removal and harvest of the entire plantation and possibly restoration efforts (such as prescribed burning) to encourage native Pine Barrens vegetation to return to this site within the public forest.

Respectfully submitted,

Amy Karpati, Ph.D.
Pinelands Preservation Alliance