



PINELANDS PRESERVATION ALLIANCE

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Pinelands Commission Meeting June 11, 2010 ***Provided by Russell Juelg***

PPA Testimony for Pinelands Commission Meeting June 11, 2010

We would like to continue our dialogue with the Commission on several issues that arise regularly.

1. As you know, biologists have thoroughly documented the fact that **roads** have significant adverse impacts on natural communities. In all likelihood, paved roads introduce more harm to natural communities than do unpaved roads. For example, paved roads attract reptiles because of the warm surface. Paved roads are bound to get more traffic, by and large, than do unpaved roads. People are bound to drive faster on paved roads than they do on unpaved roads. And it only stands to reason that wider roads tend to have worse impacts than do narrow roads. Whether you increase the number of animals on a road, make the road wider, or increase the amount or velocity of the traffic, the only reasonable expectation is that, under such circumstances, animal injury and mortality rates will go up.

We expect that the Commission is developing a coherent approach to this situation. So, whenever you are inclined to authorize new paving and widening projects, within what appears to be an eternal string of proposed new paving and widening projects, would you please reveal to the public exactly how you might arrive at the conclusion that, contrary to logic and the available facts, and absent any supporting evidence, somehow, all these new paving and widening jobs comply with your regulations?

2. We notice that, from time to time, people process development applications with the Commission in order to “improve” roads for the sake of “**safety**.” We speculate that these must be situations where a lot of cars are crashing into each other, or, perhaps, pedestrians or bicycle riders are being struck.

However, whenever we have reviewed such application files, we have been hard pressed to find any evidence of accidents associated with the development sites. We assume that there must be a record of accidents, in each case, that the Commission would not accept a *mere assertion* by the applicant that the reason for the road “improvement” is “safety.”

Would you please tell us where the Commission files these accident reports, so we can review them?

3. We have been told that the Commission bases its policies and practices on good science. So whenever the Commission is ready to authorize a development that impacts an area with a natural plant community, we would expect that someone has actually demonstrated—via some kind of scientifically supportable analysis of the situation—that the **threatened and endangered plant species** provisions of the CMP are being complied with.

Consequently, we find it baffling when the Commission is willing to authorize a development without anyone actually demonstrating anything. For example, sometimes the Commission does not require a Natural Heritage Report, does not require a survey, and does not take into account that, normally, one

cannot determine which plants may be in an area unless one thoroughly examines the site during early, mid, and late season. We have not been able to find any local botanists who would be confident in ruling out the possibility of T&E plant species being on a site—even a rather small site—without doing some pretty careful field work.

Would you please explain to the public what your method is?

4. Imagine a female **Pine Snake** whose nest site is fully protected, but whose hibernation site and foraging areas have been badly degraded. Imagine this same creature facing increasingly greater risks every year due to new roads, wider roads, and more paved roads within its habitat. What good is a nest site to an animal that can't find adequate food, can't make it through the winter, or can't get across those roads without getting run over? Obviously, critical habitat for the Northern Pine Snake is not restricted to the nesting habitat.

We hope the Commission is mindful of these basic facts when processing applications that propose development within known Pine Snake habitat.

5. By the way, we are still awaiting answers to many of the questions we put on the public record at the **April Commission meeting** concerning details of the Vegetation Section of the CMP.