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## Pinelands Preservation Alliance

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PPA  
1989 - 2009

Celebrating 20 years of  
Pinelands Preservation

### **Pinelands Commission Meeting, March 12, 2010**

***Provided by Russell Juelg***

An application before you this morning (1981-1833.055) includes proposals to do some things that PPA has been critical of in the past: road widenings that don't really appear to be necessary, a lack of rigor with respect to the process of analyzing T&E species issues, and the authorizing of landscaping and revegetation practices that, in our view, clearly violate the plain sense language in your Vegetation Section in your rules.

I know the Commission is open to dialogue with us about these things, so I wanted to provide you with some food for thought. And I want to assure the Commission that PPA's advocacy truly represents public sentiment, so I created and distributed a little informal survey that addresses some of the issues. It just went out the other day, but I do have some preliminary results to share with you.

The target audience for this survey was the New Jersey Field Botany List Serve, which is composed of both government and non-government folks, most of whom have either a professional or serious amateur interest in field botany.

Looking at the survey, you see that question #1 addresses the matter paving sand roads—not an issue with this specific application, but one that is closely related. I look forward to our continued to discussion on this topic. Question #2 addresses widening of existing paved roads, which this application proposes to do. As you might expect, my respondents have, so far, overwhelmingly indicated they do not want to see all the roads in the Pinelands widened. Questions 3, 4 and 5 address survey protocols for T&E plant species. My respondents, so far, have indicated that (3) a survey for T&E plants that is restricted to a search for only a subset of the possible rarities on the site would probably be inconclusive with respect to what might

actually be there, (4) a survey for rare plants that is restricted to August and September would be likewise inconclusive, and (5) the procedure you see outlined there would give you unreliable results.

On the other sheet distributed to you, you have a summary of the kinds of people who are responding to my survey, which, I would argue, clearly indicates that, at least so far, my respondents are people who are quite well qualified to give opinion on these matters.

I understand that you may doubt my survey results on the basis of (a) the survey perhaps not sufficiently scientifically constructed (b) the small sample size, and (c) possible prejudice on the part of the respondents. And I trust that you are willing to apply that same skepticism, in a constructive manner, to the surveys and deliberative processes reflected in this application.

The Commission has long history of creativity, ingenuity, energy and skills that have been directed toward the creation and implementation of this innovative and largely successful plan, the CMP. However, as you know, there are people out there, who would accuse the Commission of investing an inordinate measure of these assets, at least in the recent past, toward helping influential applicants navigate around the rules.

Here's an opportunity for the Commission to provide some counter-evidence against those allegations. The Commission could find a way to throttle back on the expansion of road systems in the Pinelands, find a way to implement a scientifically-based vegetation standard, and develop truly credible protocols in order to implement its rules designed to protect T&E plant populations.

I'm confident the Commission will do this, I have no doubt that PPA will be an enthusiastic partner in these projects, and I have no doubt that the Commission, having accomplished these things, will receive enthusiastic praise from the public.