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PRESERVATION  
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March 25, 2024

Honorable Shawn M. LaTourette, Commissioner  
NJ Department of Environmental Protection  
501 East State Street  
PO Box 420  
Trenton, NJ 08625-0420

Re: Damaging 'Restoration' Work Underway at the Glassboro Wildlife Management Area

Dear Commissioner LaTourette,

We are writing to express our deep disappointment in the way that the restoration of the Glassboro Wildlife Management Area is being carried out. The chosen remedy appears to exacerbate the initial injury. Worse yet, this work is being carried out with heavy machinery that is damaging as well as unnecessarily costly to New Jersey taxpayers and hunting license-holders.

The new damage that has been observed since 'restoration' has begun on the property includes the following:

- No sediment control, such as straw or a silt fence, is being used. As a result, sediment is entering the wetlands, which was especially evident following the 3-4 inches of rainfall on 3/23/24.
- Huge soil-crushing machines are being driven all over the sprouting plants in order to install what appears to be a permanent fence.
- The heavy fence is being installed against the wetland where trucks should not be permitted to drive. Stumps with soil on the roots are being pushed into the spung / wetlands.
- Trucks are being parked right on top of the archaeological sites, and they are tearing them up with tire movements and traffic.

The advice that we submitted during the open public comment period seems to have been completely ignored, and we were not provided with any official or informal response. Together with the New Jersey Conservation Foundation, we advised that a minimally invasive (and lower cost) approach to restoring this land would have the following features:

- Cover open soil with straw cover (not hay) to stabilize areas currently eroding;
- Monitor the natural recruitment, while controlling the spread of invasive species;
- Control deer herbivory using ex-closures (as planned);

- Plant Atlantic White Cedar in the lowest wetland habitat restoration (as planned);
- Omit all other plantings, as well as any work with heavy machinery that would cause further soil compression; and
- Lengthen the restoration timeline to 10 years to allow for natural regeneration.

A full explanation of each of these aspects was provided in our comment letter submitted on February 14<sup>th</sup>. The archaeological site that could have been salvaged after the initial violation has now been irreversibly damaged by the ongoing 'restoration' work. One of our co-signers, Joseph Arsenault—who has been studying the land in question for over three decades—was not consulted a single time by NJDEP staff to ascertain the value of the wildlife and archaeological resources that were found here. As we have been consistently stating for over a year now, the best chance for ecological restoration to be successful is to let the soil heal and for the native seed/root bank to recover the forest. This natural restoration had already been underway, but has been seriously undermined by the current operations.

At this point Commissioner, we would ask that someone from the Division of Fish and Wildlife work closely with the contractor to minimize any additional harm regarding siltation, soil compaction, and plant damage to the site while erecting the deer fencing, and please open the communications with our organizations so that we can support the future work planned to restore the plant community on site.

Sincerely,

Jaclyn Rhoads, Assistant Executive Director  
Pinelands Preservation Alliance

Jay-Watson, Co-Executive Director  
New Jersey Conservation Foundation