



State of New Jersey

THE PINELANDS COMMISSION

PO Box 359

NEW LISBON, NJ 08064

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www.nj.gov/pinelands



MIKIE SHERRILL
Governor

DR. DALE G. CALDWELL
Lt. Governor

General Information: Info@pinelands.nj.gov
Application Specific Information: AppInfo@pinelands.nj.gov

LAURA E. MATOS
Chair
SUSAN R. GROGAN
Executive Director

MEMORANDUM

To: CMP Policy and Implementation Committee

From: Gina A. Berg *gab*
Director, Land Use Programs

Date: February 18, 2026

Subject: February 27, 2026 Committee Meeting

Enclosed please find the agenda for the Committee's upcoming meeting on Friday, February 27, 2026. We have enclosed the following:

- minutes from the Committee's January 30, 2026 meeting; and
- a draft resolution and ED report on the First Amendment to the 2003 AT&T Plan.

The Committee meeting will be conducted in-person and via teleconference. Specific access information will be provided to all Committee members in a separate email. The public is invited to attend the meeting in-person or view and participate in the meeting through the following YouTube link:

www.youtube.com/c/PinelandsCommission



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CMP POLICY & IMPLEMENTATION COMMITTEE MEETING

February 27, 2026 – 9:30 a.m.

This meeting will be held in-person and virtually

Richard J. Sullivan Center for Environmental Policy and Education
Terrence D. Moore Conference Room
15C Springfield Road
New Lisbon, New Jersey

Watch the meeting on the Pinelands Commission YouTube channel:

www.youtube.com/c/PinelandsCommission

To Provide Public Comment, Please Dial: 1-929-205-6099 Meeting ID: 815 5909 8526

Agenda

1. Call to Order
2. Adoption of the minutes from the January 30, 2026 CMP Policy & Implementation Committee Meeting
3. Stafford Township Forecastle Lake Accessible Trail Project Summary Presentation
4. Review of Executive Director's report on the First Amendment to the 2003 AT&T Local Communications Facilities Plan
5. Public Comment
6. Adjournment

CMP POLICY & IMPLEMENTATION COMMITTEE MEETING

This meeting was conducted both remotely and in-person
The public could view/comment through Pinelands Commission YouTube link:
www.youtube.com/c/PinelandsCommission

Richard J. Sullivan Center
15C Springfield Rd
New Lisbon, New Jersey 08064
January 30, 2026 – 9:30 a.m.

MINUTES

Members in Attendance: Chair Laura E. Matos, Guy Matro

Members in Attendance (Zoom): Alan W. Avery, Jessica Rittler Sanchez

Members Absent: Deborah Buzby-Cope, Jerome H. Irick, Theresa Lettman, Mark S. Lohbauer, Douglas Wallner

Staff Present: Gina Berg, John Bunnell, Ernest Deman, April Field, Lori Friddell, Susan R. Grogan, Brad Lanute, Paul Leakan, Stacey P. Roth

Also in attendance: Michael Eleneski with the Governor's Authorities Unit (Zoom)

1. Call to Order

Chair Matos called the meeting to order at 9:30 a.m.

2. Adoption of minutes from the November 21, 2025 CMP Policy & Implementation Committee Meeting

Commissioner Rittler Sanchez requested a revision of the minutes related to the discussion of accessible trail paving. The requested revision would read, "Ms. Berg responded that although the CMP may allow paved trails in wetlands buffers, it would not require paving."

Commissioner Avery moved the adoption of the minutes of the November 21, 2025 meeting minutes as revised. Commissioner Rittler Sanchez seconded the motion. All Ayes. The motion passed.

3. Update on Jackson Township's Affordable Housing Plan

Attachment A to these minutes and posted on the Commission's website at the following address:
https://www.nj.gov/pinelands/home/presentations/2026.01.30_P_I_Jackson%20Update.pdf

Chief Planner Brad Lanute provided an update on Jackson Township's Affordable Housing Plan. He outlined the materials the Township has submitted to the Commission for review and noted that Commission staff have communicated concerns regarding the plans and ordinances. He stated that the Township requested, and was granted, an extension of the Commission's review

period in order to meet with Commission staff, discuss the concerns raised, and provide a response.

Mr. Lanute provided an overview of Jackson Township's geography, highlighting the portions of the Township located within the Pinelands Area and the composition of Pinelands management areas. He noted the presence of extensive wetland systems, as well as significant tracts of preserved land, particularly along the Toms River Corridor and the Ridgeway Branch.

Mr. Lanute then reviewed the Township's 2025 Housing Element and Fair Share Plan. He discussed the Township's Fourth Round prospective need obligation, which was set at 1,000 units, and noted that this was among the largest obligations of any Pinelands municipality. He described the proposed affordable housing sites within the Pinelands Area for both the Third Round (1999–2025) and Fourth Round (2025–2035), noting that none of the sites have been constructed. He emphasized that 58% of the Township's Fourth Round prospective need (581 units) is planned to be met within the Pinelands Area. He also noted that the cumulative Third and Fourth Round project sites within the Pinelands Area would total 5,390 units, of which 1,047 would be affordable. He stated that all Pinelands sites are proposed as inclusionary developments, consisting of a mix of market-rate and affordable units.

Mr. Lanute then reviewed the proposed Fourth Round project sites within the Pinelands Area, including the Pine Barrens Golf Course (Rural Development Area), the Rutherford Site (Pinelands Village), and the Grawtown site and Viviano Properties (Regional Growth Area). He indicated that mixed-use development is proposed on all sites and compared the proposed development intensity at each site to what is permitted under the Township's currently certified zoning. He noted that none of the proposed projects conform to the current certified zoning.

Mr. Lanute briefly spoke about the implementing ordinances submitted by the Township. Two ordinances establish affordable housing overlay districts that would allow inclusionary mixed-use development at a density of eight units per net developable acre (exclusive of affordable housing). The ordinances allow townhouses and affordable multifamily dwellings and require the acquisition and redemption of Pinelands Development Credits for 30% of the market-rate units.

Mr. Lanute concluded by outlining next steps. He stated that Commission staff plans to meet with Jackson Township representatives next week to discuss the concerns raised by the submitted master plans and ordinances. Staff will continue to provide guidance regarding where increases in density may be appropriate and will discuss the documentation needed to demonstrate that adequate sewer and water capacity is available to support any increased density. He also noted that staff will continue to monitor the ongoing court challenge to the Township's Housing Element and Fair Share Plan, which the Commission is not a party to.

Commissioner Rittler Sanchez inquired if there is a difference in allowable units based on New Jersey Department of Environmental Protection (NJDEP) wetlands requirements and in Pinelands wetlands requirements. ED Grogan said concerns with density are not related specifically to the extent of wetlands. Wetlands buffers will constrain the area of development. Commissioner Rittler Sanchez followed up asking if the housing numbers were based on a larger acreage because NJDEP wetlands restrictions do not apply to affordable housing. ED Grogan said that Pinelands Comprehensive Management Plan (CMP) standards for wetlands buffers

would be applied and that NJDEP regulations would not be applicable in the Pinelands Area. She added that the Rural Development Area site presents additional concerns about residential density and the importance of the Toms River headwaters and the Toms River Corridor Plan. Mr. Lanute recapped the broad methodology for calculating the number of housing units.

Commissioner Rittler Sanchez asked who would take the next step to identify areas that are appropriate for the additional residential density and whether Commission staff had identified areas with water and sewer where these densities would be appropriate. ED Grogan said the Commission's role in reviewing the housing plan does not include identifying areas for development and added that Regional Growth Areas are already designated for higher density to be served by public utilities. She noted that the calculation of need for municipal affordable housing units is based on the developable area in the Regional Growth Area, not in a Rural Development Area. She said there are many active residential development applications in the Township's Regional Growth Area that are currently held up for various reasons, including the lack of public sanitary sewers. Ed Grogan said the primary concern about density is related to selecting sites in the Rural Development Area and Village where those high densities are not appropriate or permitted by the CMP.

Commissioner Avery asked if any municipalities are using mechanisms other than mandatory set asides for affordable housing, referred to as inclusionary zoning. Mr. Lanute said almost all are using inclusionary zoning to accommodate affordable housing. The Commission has seen few plans or ordinances that propose 100% affordable housing projects. He said that reliance on inclusionary zoning raises concerns over the total number of dwelling units needed to satisfy the affordable housing required.

Commissioner Avery asked whether any portion of the golf course site was deed restricted due to threatened and endangered species concerns. Mr. Lanute said a significant portion of the golf course site was deed restricted.

Commissioner Avery noted that the Ocean County Natural Lands Trust owns a parcel that spans both sides of the Toms River adjacent to the Grawtown site. He questioned whether the Grawtown site consists entirely of uplands or is less constrained by wetlands buffer requirements. ED Grogan that there is some encroachment of wetlands and wetlands transition areas onsite and there are likely to be threatened or endangered species habitat considerations, as well.

4. Overview of Public Notice Amendments

Attachment B to these minutes and posted on the Commission's website at the following address:
<https://www.nj.gov/pinelands/home/presentations/Presentation%20on%20Public%20Notice%20Amendments%20-%20January%2030%202026.pdf>

Chief of Legal and Legislative Affairs Stacey Roth presented an overview of the state's 2025 Public Notice law and associated tasks that the Commission must complete. She said effective March 1, 2026, the Commission will be required to publish its legal notices and maintain an archive of such notices on the Commission's website. She said that the Commission will also need to provide hyperlinks to the New Jersey Secretary of State for its centralized legal notice webpage when the site is operational. She reviewed other impacts on Commission application

procedures and legal notices required of applicants. ED Grogan said applicants often contact the Commission to ask what the official newspaper is for their development site, and we will have to be able to provide guidance to applicants. Ms. Roth said there is no prohibition against using newspapers and some may choose to provide notice both online and in newspapers. The presentation ended with next steps including drafting related CMP amendments, implementing website changes and a public notice archive, updating applicant guidance and regulatory documents, and sharing the hyperlinks with the Secretary of State website for public notices published by the Commission.

Commissioner Rittler Sanchez asked for further clarification on procedures that applicants must follow if a public notice is required for their application and expressed disappointment about the low level of public participation in public hearings. She asked how notice was provided for the public hearing on the cell tower amendment. ED Grogan responded that the Commission provides public notice via publication in the Commission's official newspapers, on our website and via extensive distribution to email contacts. The applicant was not required to do public notice for the hearing. They were required to provide notice to other cell carriers of the filing of their proposed plan amendment. She said that declining public participation at hearings has been an issue, not just at Commission public hearings but also for other agencies, for several years. It is not known whether the change to online notices will increase public participation at hearings.

Commissioner Avery questioned the need to continue newspaper publication of notices after the Secretary of State's website is operational and when the Commission provides links to that website and updates the Commission website to have all Commission notices. He said the State's website will contain all public notices and it is searchable. ED Grogan elaborated on the law's requirement for a one-year transition period during which the Commission must post notices on our website but also publish in an online newspaper that meets the circulation requirements. Commissioner Avery said that it has become increasingly difficult to identify what newspaper is of general circulation in any given geographic area because of decrease in regional papers and an increase in special interest, free papers. Ms. Roth said the legislation contains criteria for determining what constitutes an eligible online news publication. Commissioner Avery noted that the Secretary of State's website will result in a substantial savings for public agencies that are required to provide public notices and this will also benefit the public who will have easier, free access to those notices.

Chief Permit Administrator April Field noted that development applications involving General Permits and certain other development types should be added to the list of CMP amendments and regulatory documents that might require updates to address the law. Ms. Field asked if the law applied to notices applicants must provide to property owners within 200 feet of their proposed development. Ms. Roth said the law only applies to public notices and not to notices mailed to nearby property owners. ED Grogan said that the applicant's obligation to notify nearby property owners, via mail, will continue.

5. 2025 Year-end Conformance Summary Presentation

Attachment C to these minutes and posted on the Commission's website at the following address:
https://www.nj.gov/pinelands/home/presentations/2026.01.30_P_I_2025%20Conformance%20Review.pdf

Chief Planner Brad Lanute presented a summary of activity seen in 2025 in reviewing municipal ordinances and plans for conformance with the CMP. He said much of the conformance program activity related to affordable housing plans and ordinances. He said that redevelopment plans and cannabis-related zoning changes formed another significant piece of municipal conformance reviews. The presentation finished with notes on anticipated needs for municipal ordinances to implement affordable housing plans, the NJDEP REAL rules adopted on January 20, 2026 and associated new requirements for stormwater management, and ongoing responses to cannabis and warehouse economies.

6. Public Comment

Mark Pesotski expressed his concerns regarding the proposed construction of a data center in Monroe Township. He said the proposed center will require 99 of 171 acres of the property and that the property contains wetlands and is an active wildlife corridor. Mr. Pesotski remarked that the Monroe Township Municipal Utilities Authority (MUA) has approved 1.4 million gallons of water per day for the site. He said AI data centers produce diesel waste, noise pollution, and soil and water contaminants. He urged the Commission to prohibit its construction.

Fernando Powers read a prepared statement (Attachment D) regarding beaver created wetlands and the hydrological system on block 8401 lots 8-10 in Monroe Township. He expressed his opposition to the construction of a data center at the site and said the presence of the beaver triggers protections under the CMP, as well as NJDEP wetlands and water-allocation standards and is un-approvable under federal law.

Kimberly Pesotski said her family property is within 50 feet of the proposed data center in Monroe Township. She inquired about what the redevelopment plan allows. She said the site was previously protected and hopes the Pinelands Commission will continue to uphold the CMP and its mission statement to protect the area.

Russell Juelg, speaking on behalf of the Partnerships for New Jersey Plant Conservation, said the Pinelands Commission staff's work plan includes updating the CMP list of protected plant species. He recommended the New Jersey Natural Heritage Program as a resource and suggested the creation of a working group. He referenced additional consultation sources and provided a comprehensive plant species protected and endangered list (Attachment E). Mr. Juelg remarked that a data-sharing agreement between the Commission and the NJDEP is unlikely to happen.

Emile Devito supported the comments and research of Mr. Juelg. He added that utilizing the spreadsheets as provided and eliminating from the list those species already under state protection and those protected as wetlands species leaves only 30 that would require additional protection. Regarding the Monroe Township proposed data center, he said the use of 1.4 million gallons of water a day is substantial and equivalent to the water demand of 17,000 people. He said the Township's amended ordinance that added data centers to the redevelopment area is a substantial change and should be addressed.

Heidi Yeh of the Pinelands Alliance, regarding public notices, expressed concern with the lack of notification regarding proposed redevelopment plans to nearby residents. She said residents are notified of a development application after a redevelopment plan is adopted. The development may comply with the adopted redevelopment plan, but this process limits the opportunity for public engagement when it could be most effective prior to the development application or site plan review at the municipal level. Ms. Yeh advocates that staff should discuss redevelopment

plans and ordinances if a data center is being added as a permitted use with Commissioners before administratively allowing the ordinances to take effect. Lastly, Ms. Yeh suggested the topic of road salt use within the Pinelands for future discussion and study. She said calcium chloride is a more eco-friendly option.

Paul Riviere said he is a member of the Jackson Conservation Coalition. He said the Coalition supports the Pinelands Commission and is unhappy with the Jackson Township affordable housing plan. He recognized the efforts and pressures that might be exerted on the Pinelands Commission and asked that rules not be bent for Jackson Township. He expressed concern with clear cutting in Jackson Township and the impact on wildlife. He requested public advertising of any meetings with Jackson Township and inquired if presentations from today's meeting would be made public. Paul Leakan, Pinelands Communications Officer, responded that all presentations are posted to the website after the meeting. Mr. Riviere stated he hopes the Commission will obtain copies of all plans related to the Jackson Township lawsuit.

Holly Reynolds, a resident of Jackson Township and member of the Environmental Commission and Jackson Conservation Coalition, expressed concern with Jackson Township's ordinances, affordable housing plans and land capacity factor used in the affordable housing plan. She requested the Pinelands Commission hold Jackson responsible for complying with the CMP and respecting environmentally sensitive areas. Ms. Reynolds noted that a significant area of land near the golf course has been clear cut.

Janine Geise, a resident of Monroe Township, expressed concern with development applications that are related to data centers and warehouses. She urged that decisions protect land and people not big business. She supported prior comments on the proposed AI data center, adding that it will impact the quality of lives and land and that there is a lack of public notification regarding redevelopment plans. She said public participation and knowledge is important and feels decisions are made prior to residents being notified. Ms. Geise said she is grateful for the Pinelands Commission's livestreaming of meetings and agenda posting.

Fred Akers of the Great Egg Harbor Watershed Association expressed concern with the water use proposed with the Monroe Township data center. He said data center water use is a new issue with little reference data. He said the State Water Supply Plan shows 4.5 million gallons available and therefore the proposed 1.4 million gallons per day use for one applicant accounts for a third of total available water, and that existing demand already accounts for the available water in the watershed. He said allowing a data center to receive this additional water allocation may limit other development and use of Pinelands Development Credits (PDCs) in the future. Mr. Akers said he would continue research and provide written comments to the Commission.

7. Adjournment

There being no other business, Commissioner Matro moved to adjourn the meeting. Commissioner Avery seconded the motion. All Ayes. The meeting was adjourned at 11:33 a.m.

Certified as true and correct:

Lori Friddell
Land Use Programs Technical Assistant

Date: February 3, 2026

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2. Pinelands - Specific Argument by Fernando Powers, Indigenous
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6. Hydrological Diagrams
7. CMP Violations Summary
8. Federal Section 404 Analysis
9. Conclusion

Pinelands cover letter

Fernando Powers

717 Meade Ct
Williamstown, NJ 08094
(856) 842-7024

Date: 1/30/2026

New Jersey Pinelands Commission
P.O. Box 359
15 Springfield Road
New Lisbon, NJ 08064

Re: Submission of Supporting Evidence – Beaver-Created Wetlands and Hydrological System on Block 8401, Lots 8, 9 & 10 (Monroe Township, Williamstown, NJ)

To the Members of the Pinelands Commission:

I respectfully submit the enclosed **Supporting Evidence of Fernando Powers, Indigenous, Native American, United States Marine Disabled Combat War Veteran**, documenting the presence of a **live beaver** and an actively maintained **beaver-engineered wetland and hydrological system** on or adjacent to **Block 8401, Lots 8, 9 & 10** in Monroe Township (Williamstown), New Jersey.

This **Supporting Evidence** is being provided to ensure the Commission has accurate, firsthand, and legally relevant information regarding the ecological and hydrological conditions on the property proposed for development. Picture of chewed by the beaver and actual chips off the chewed bark with teeth prints.

The applicant seeks approval for **two separate warehouse buildings totaling approximately 1.63 million square feet**, along with associated clearing, grading, stormwater basins, and a proposed **water withdrawal of approximately 1.4 million gallons per day**. As detailed in the **Supporting Evidence**, these activities would directly and irreversibly impact the beaver-maintained wetland system, the surrounding forested wetlands, and the hydrology of the Kirkwood-Cohansey aquifer.

The presence of the beaver and its engineered pond system triggers multiple protections under the **Pinelands Comprehensive Management Plan (CMP)**, including but not limited to:

- **N.J.A.C. 7:50-6.4 and 6.5** – Wetlands and wetlands buffer protections
- **N.J.A.C. 7:50-6.33** – Threatened and endangered species habitat protections
- **N.J.A.C. 7:50-6.84 to 6.86** – Water resource and aquifer protection standards
- **N.J.A.C. 7:50-6.102** – Impervious surface and stormwater infiltration requirements
- **N.J.A.C. 7:50-4.64** – Public-interest standard for development approvals

Additionally, because the beaver-created wetlands exhibit hydric soils, hydrophytic vegetation, and persistent wetland hydrology, any disturbance would require a **Clean Water Act Section 404 permit** from the U.S. Army Corps of Engineers. A warehouse is not a water-dependent use, and practicable upland alternatives exist; therefore, a Section 404 permit cannot lawfully be issued.

For these reasons, the proposed development is **inconsistent with the CMP, incompatible with NJDEP wetlands and water-allocation standards, and unapprovable under federal law.**

I respectfully request that this **Supporting Evidence** be entered into the administrative record for this application and that the Commission consider the documented presence of the beaver and its hydrological system as a material factor requiring **denial** of the proposed development.

Thank you for your attention to this matter and for your continued commitment to protecting the ecological integrity of the Pinelands.



Date 1/30/2026

Respectfully submitted,
Fernando Powers

Indigenous, Native American

United States Marine Disabled Combat War Veteran

PINELANDS-SPECIFIC ARGUMENT: BEAVER-CREATED WETLANDS & HYDROLOGY

1. The Presence of a Beaver Establishes a Legally Protected Hydrological System

Good morning. My name is Fernando Powers, Indigenous, American Indian, United States Marine Disabled Combat war Veteran and former Zoning Board member for Monroe Twp. I have several direct questions for the applicant and their experts. These questions go to the heart of whether this project is even *legally permissible*, let alone advisable. With the power of God almighty Jesus Christ and the intercession of our Blessed Mother Mary the mother of God almighty I will start with my statement of facts to follow up with some simple questions;

A beaver living in the stream on Block 8401 is not a minor ecological detail — it is a **legally determinative fact** under the Pinelands **Comprehensive Management Plan (CMP)**.

Beavers are **ecosystem engineers** whose dams and ponds create:

- Hydric soils
- Persistent surface water
- Hydrophytic vegetation
- Expanded floodplain wetlands
- Elevated groundwater tables

Under the CMP, these features are **regulated wetlands**, regardless of whether they appear on older NJDEP maps.

This means the beaver's activity **expands the area of protected wetlands** on the site.

2. CMP Wetlands Standards Prohibit Disturbance of Beaver-Created Wetlands

The CMP wetlands standards at N.J.A.C. 7:50-6.4 and 6.5 prohibit:

- Filling
- Clearing
- Grading
- Draining
- Altering hydrology
- Disturbing wetland buffers

A beaver pond is a **wetland created and maintained by natural hydrology**, and the CMP requires that natural hydrology be preserved.

A 1.63-million-square-foot warehouse would:

- Alter stream flow
- Lower water levels
- Increase sedimentation
- Disrupt the beaver's dam
- Destroy the wetland system the beaver maintains

All of these are **explicit CMP violations**.

3. Beaver Wetlands Trigger Additional CMP Protections for Wetland-Dependent Species

Beaver ponds support habitat for multiple species protected under N.J.A.C. 7:50-6.33, including:

- Pine Barrens treefrog
- Barred owl
- Northern pine snake (foraging habitat)
- Timber rattlesnake (prey availability)
- Multiple amphibians and reptiles

If any of these species use the beaver pond — and they almost certainly do — the CMP requires **denial** of any project that would degrade or fragment that habitat.

The warehouse would eliminate the hydrology that sustains these species.

4. Beaver Activity Expands Wetland Buffers

Under the CMP, wetlands require **75–300 foot buffers** depending on habitat sensitivity.

Because beaver ponds:

- Expand wetland boundaries
- Increase surface water area
- Raise groundwater levels
- Create saturated soils beyond the pond edge

...the legally required buffer expands as well.

This expanded buffer **overlaps the proposed warehouse footprint**, making the project inconsistent with the CMP.

5. Beaver-Created Hydrology Conflicts with the 1.4 Million Gallons/Day Water Withdrawal

The applicant's proposed withdrawal of **1.4 million gallons per day** would:

- Lower the water table
- Reduce stream flow

- Dry out the beaver pond
- Collapse the wetland system
- Eliminate habitat for wetland-dependent species

Under **N.J.A.C. 7:50-6.86**, the CMP prohibits any development that:

- Lowers the water table
- Alters wetland hydrology
- Reduces stream baseflow
- Harms wetland-dependent species

The beaver's presence makes these impacts **unavoidable and fatal** to the application.

6. Beaver Wetlands Trigger Federal Jurisdiction Under Section 404

Because the beaver creates wetlands and hydrological connectivity, the stream and pond are **waters of the United States** under the Clean Water Act.

This means:

- Any disturbance requires a **U.S. Army Corps of Engineers Section 404 permit**
- The warehouse is **not water-dependent**
- A practicable upland alternative exists
- Therefore, USACE **must deny** the permit

The CMP requires federal consistency.

If USACE cannot issue a 404 permit, the Pinelands Commission **cannot** approve the project.

7. CMP Public-Interest Standard Cannot Be Met

Under **N.J.A.C. 7:50-4.64**, development must serve the public interest.

Destroying a beaver-maintained wetland system — which provides:

- Flood control
- Water purification
- Aquifer recharge
- Biodiversity support
- Habitat for protected species

— cannot be justified by a private warehouse consuming **1.4 million gallons/day**.

The CMP **Comprehensive Management Plan** requires denial where the public interest is not served.

Conclusion: The Beaver Makes CMP Compliance Impossible

The presence of a beaver on Block 8401 is not a footnote — it is a **legal barrier** that triggers:

- Expanded wetlands jurisdiction
- Expanded buffers
- Threatened species protections
- Hydrological protections
- Federal Section 404 jurisdiction
- CMP public-interest requirements

A 1.63-million-square-foot warehouse cannot meet any of these standards.

The CMP requires denial.

QUESTIONS — PINELANDS COMMISSION

Proposed Warehouses – Block 8401, Lots 8, 9 & 10, Williamstown, NJ

Good evening. My name is Fernando Powers, Indigenous, American Indian, United States Marine Disabled Combat war Veteran and former Zoning Board member for Monroe Twp. I have several direct questions for the applicant and their experts. These questions go to the heart of whether this project is even *legally permissible*, let alone advisable. With the power of God almighty Jesus Christ and the intercession of our Blessed Mother Mary the mother of God almighty I will start with my questions;

Wetlands & Beaver-Created Hydrology

1. Are you aware that a live beaver is actively maintaining a dam and pond system on Block 8401 — yes or no.
2. Did you disclose this beaver-created wetland system in your application — yes or no.
3. Did you conduct a wetlands re-delineation after the beaver expanded the hydrology — yes or no.
4. Can you show any CMP **Comprehensive Management Plan** subsection that allows disturbance of a beaver-created wetland — yes or no.
5. Can you show any CMP subsection that allows disturbance of wetlands buffers for a private warehouse — yes or no.

Threatened & Endangered Species

6. Did you conduct a full threatened-and-endangered species survey — yes or no.
7. Did that survey include Pine Barrens treefrog, barred owl, timber rattlesnake, and northern pine snake — yes or no.
8. If you did, where is the report. If you didn't, how can you claim CMP compliance.
9. Can you cite a single CMP subsection that allows habitat degradation for listed species — yes or no.

Aquifer & Water Withdrawal (1.4 Million Gallons/Day)

10. Where is your groundwater model showing that withdrawing 1.4 million gallons per day will not lower the Kirkwood-Cohansey aquifer.
11. Where is your analysis showing no impact to wetlands, vernal pools, or the beaver pond.
12. Has NJDEP ever approved a private industrial withdrawal of this magnitude in the Pinelands — yes or no.
13. Can you show any CMP subsection that allows a withdrawal that lowers the water table — yes or no.

Two-Building Configuration

14. Does splitting the warehouse into two buildings reduce the total impervious surface — yes or

no.

15. Does splitting the warehouse reduce the total wetlands disturbance — yes or no.
16. Does splitting the warehouse reduce the total water demand — yes or no.
17. Does splitting the warehouse reduce the impact on the beaver-maintained wetland system — yes or no.

Every answer is **no**, and that's devastating.

Stormwater & Recharge

18. Can you demonstrate that two warehouse buildings totaling 1.63 million square feet can meet CMP infiltration requirements — yes or no.
19. Can you show that pre-development recharge will be maintained — yes or no.
20. Can you show that stormwater basins will not be placed in wetlands or buffers — yes or no.

Pinelands CMP Compliance

21. **Can you identify the specific CMP Comprehensive Management Plan subsection that allows a 1.63-million-square-foot for two warehouses in a zone containing wetlands, threatened species habitat, and headwater hydrology?**

If you cannot cite the subsection, then you cannot claim compliance.

Clean Water Act Section 404

21. Did you disclose that beaver-created wetlands trigger federal jurisdiction — yes or no.
22. Is a warehouse a water-dependent use — yes or no.
23. Can you cite one example where USACE approved a non-water-dependent warehouse requiring wetland fill in the Pinelands — yes or no.
24. Can you produce your **Alternatives Analysis**

Under federal law, the applicant must prove that no practicable alternative exists.
So my question is simple:

Can you show this board a single page of your alternatives analysis demonstrating that no upland site exists anywhere in the region?

If you cannot, then the U.S. Army Corps is required to deny your permit.

Public Interest

25. **How does a private warehouse consuming 1.4 million gallons/day serve the public interest of the Pinelands?**
Because the CMP, NJDEP, and USACE all require a clear public-interest justification.
And “private profit” is not a public interest.
26. **Can you cite any CMP subsection that allows approval of a project that harms wetlands, hydrology, threatened species, and aquifer recharge — yes or no.**

Conclusion

This project fails at every level:

- It violates the Pinelands CMP **Comprehensive Management Plan**
- It violates NJDEP wetlands and water-allocation standards
- It violates the Clean Water Act Section 404(b)(1) Guidelines
- It cannot pass a threatened-species review
- It cannot pass a hydrological review
- It cannot pass a public-interest test

This application is not just flawed — it is **legally impossible** to approve.

I urge this board to reject it outright.

Thank you.

Respectfully, Fernando Powers

Indigenous, American Indian,

U. S. Marine Disabled Combat war Veteran

Former Zoning Board member for Monroe Twp.

TECHNICAL APPENDIX

Applicable Regulations, CMP Subsections, and Federal Standards
Proposed Warehouse – Block 8401, Lots 8, 9 & 10, Monroe Township (Williamstown), NJ

1. Wetlands Protections (Pinelands CMP)

Relevant CMP Sections

- N.J.A.C. 7:50-6.4 – Wetlands management standards
- N.J.A.C. 7:50-6.5 – Wetlands buffers and disturbance prohibitions
- N.J.A.C. 7:50-6.23 – Prohibited activities in wetlands
- N.J.A.C. 7:50-6.24 – Standards for development near wetlands

Regulatory Requirements

- No filling, grading, clearing, or disturbance of wetlands.
- Buffers of **75–300 feet** depending on habitat sensitivity.
- Stormwater basins and impervious surfaces prohibited within buffers.
- Development must avoid adverse hydrologic impacts.

Violation

A 1.63-million-square-foot warehouse requires massive grading, clearing, stormwater basins, and impervious coverage — all incompatible with CMP wetlands protections.

2. Threatened & Endangered Species Protections

Relevant CMP Sections

- N.J.A.C. 7:50-6.33 – Endangered and threatened wildlife standards
- N.J.A.C. 7:50-6.34 – Habitat disturbance prohibitions
- N.J.A.C. 7:50-6.25 – Vegetation disturbance restrictions

Regulatory Requirements

- Development must not destroy or degrade habitat for listed species.
- Requires full species surveys and habitat impact analysis.
- Applies to species including:
 - Pine Barrens treefrog

- Barred owl
- Timber rattlesnake
- Northern pine snake
- Beaver (Ecosystem Engineer)

Violation

The project area contains suitable habitat for multiple listed species.

A warehouse of this scale causes **permanent habitat fragmentation**, violating CMP Subchapter 6.

3. Aquifer Protection – Kirkwood-Cohansey Water Supply

Relevant CMP Sections

- N.J.A.C. 7:50-6.84 to 6.86 – Water resource protection
- N.J.A.C. 7:50-6.87 – Groundwater withdrawal standards
- N.J.A.C. 7:50-6.88 – Prohibition on adverse impacts to wetlands hydrology

Regulatory Requirements

- Development must not cause lowering of the water table.
- Must not reduce wetland hydrology or stream baseflow.
- Must not impair the Kirkwood-Cohansey aquifer.
- Requires groundwater modeling for large withdrawals.

Violation

The applicant's stated water demand of **1.4 million gallons/day** would:

- Lower the aquifer
- Dry out wetlands and vernal pools
- Reduce stream baseflow
- Harm threatened species

No CMP provision allows a private industrial withdrawal of this magnitude.

4. Stormwater, Impervious Surface, and Recharge Requirements

Relevant CMP Sections

- N.J.A.C. 7:50-6.84(a) – Stormwater infiltration
- N.J.A.C. 7:50-6.85 – Groundwater recharge
- N.J.A.C. 7:50-6.102 – Impervious surface limits

Regulatory Requirements

- Stormwater must infiltrate on site.
- Recharge must be maintained at pre-development levels.
- Impervious coverage is strictly limited in Pinelands management areas.

Violation

A 1.63-million-square-foot warehouse plus parking and loading areas cannot meet infiltration or recharge requirements and exceeds impervious limits.

5. Clean Water Act – Section 404 (Federal Law)

Relevant Federal Regulations

- Clean Water Act §404 – Permit required for discharge of fill into wetlands
- 40 C.F.R. §230.10 (404(b)(1) Guidelines) – Mandatory denial criteria
- Clean Water Act §404(c) – EPA veto authority

Regulatory Requirements

USACE must deny a permit if:

- A **practicable alternative** exists that avoids wetlands
- The project is **not water-dependent**
- The project causes **significant degradation**
- The project is not in the public interest

Violation

- A warehouse is **not water-dependent**
- Upland alternatives exist
- Wetlands would be degraded
- Aquifer impacts violate public-interest standards

USACE would be legally required to deny a Section 404 permit.

6. NJDEP Freshwater Wetlands Act

Relevant NJDEP Regulations

- **N.J.A.C. 7:7A-1.1 et seq.** – Freshwater Wetlands Protection Act rules
- **N.J.A.C. 7:7A-7.1** – Individual Permit standards
- **N.J.A.C. 7:7A-10.2** – Transition area requirements

Regulatory Requirements

- Avoidance of wetlands impacts is mandatory.
- Alternatives analysis required.
- No significant adverse environmental impact allowed.
- Buffers must be maintained.

Violation

A warehouse of this scale cannot avoid wetlands impacts and cannot meet NJDEP's Individual Permit standards.

7. CMP Public-Interest Requirement

Relevant CMP Section

- **N.J.A.C. 7:50-4.64** – Public interest standard for development approvals

Regulatory Requirements

Development must serve the public interest of the Pinelands.

Violation

A private warehouse consuming **1.4 million gallons/day** provides no public benefit and imposes severe environmental costs.

8. Local Authority Cannot Override State or Federal Law

Relevant Legal Principles

- CMP supersedes municipal zoning
- NJDEP wetlands rules supersede local approvals
- Federal Clean Water Act supersedes state and local approvals

Implication

Even if a local board approved the project, it **cannot** override CMP, NJDEP, or USACE jurisdiction.

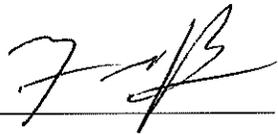
Conclusion

Based on the above authorities, the proposed warehouse on Block 8401, Lots 8, 9 & 10 is **inconsistent with the CMP, violates NJDEP wetlands and water-allocation standards, and cannot obtain a federal Section 404 permit.**

The project is **legally unapprovable** at every level.

Thank you.

Respectfully,



Date

1/30/2026

Fernando Powers

Indigenous, American Indian,

U. S. Marine Disabled Combat war Veteran

Former Zoning Board member for Monroe Twp.

PARCEL DESCRIPTION

Block 8401, Lots 8, 9 & 10

- Location: Williamstown, NJ
- Acreage: ~150–170 acres
- Features:
 - Beaver-engineered stream and pond
 - Forested wetlands
 - Intermittent streams
 - Headwater hydrology
 - High groundwater table
 - Pine-oak forest
- Farmed previously by Ferrucci family

HYDROLOGICAL DIAGRAMS

Vertical Cross-Section

SURFACE

Forested Uplands Beaver Pond Stream Channel
 | | |
 v v v

SOIL LAYERS

Organic Layer (Wetlands) ← Saturated most of the year

Sandy Loam (Recharge Zone)

Kirkwood-Cohansey Aquifer ← Primary water source

GROUNDWATER FLOW

<----- Direction of Flow ----->

Impact of 1.4 Million Gallons/Day Withdrawal

NORMAL WATER TABLE

~~~~~ WATER TABLE ~~~~~  
-----

WITHDRAWAL OF 1.4 MGD

-----  
~~~~~\\_\_\_\_\_/~~~~~ ← Cone of depression  

RESULT:

- Beaver pond dries out
- Wetlands collapse
- Stream baseflow decreases

CMP VIOLATIONS SUMMARY

The project violates:

- CMP wetlands protections
- CMP threatened species protections
- CMP aquifer protections
- CMP stormwater requirements
- CMP public-interest standard
- NJDEP wetlands rules
- Clean Water Act Section 404

FEDERAL SECTION 404 ANALYSIS

Under the 404(b)(1) Guidelines:

- A warehouse is **not water-dependent**
- Upland alternatives exist
- Wetlands would be degraded
- Public interest is not served

Therefore, USACE **must deny** a permit.

CMP requires federal consistency → **Pinelands Commission must deny.**

CONCLUSION

The evidence demonstrates that:

- A beaver is actively maintaining a wetland system on the property
- The wetlands are jurisdictional under CMP, NJDEP, and federal law
- The two-building, 1.63M-SF warehouse cannot avoid or minimize impacts
- The 1.4 MGD water withdrawal would collapse the hydrology
- The project is legally unapprovable at every level

The Pinelands Commission must deny the application.





Partnerships for New Jersey

Plant Conservation

Scientists, Advocates, Educators and Citizens

Working Towards Protection of New Jersey's Rare Flora

Testimony to the Pinelands Commission, January 30, 2026, concerning the CMP list of protected plant species.

As we understand, the Pinelands Commission ^{staff} has adopted, in its current Work Plan, the task of updating its list of protected plant species and adopting a protocol to make timely revisions in the future. We congratulate the Commission for taking this step, because with every passing year the discrepancies grow larger between the Pinelands list and the official state list of plant species of conservation concern.

As we have emphasized in the past, the Pinelands Commission's general commitment to scientific rigor necessitates revisions and regular updates to this list. As time goes by, a list characterized as obsolete in many respects becomes increasingly indefensible.

Any sensible approach to this problem would have to include adopting the best information available through the most reputable sources. In this regard, we continue to recommend the New Jersey Natural Heritage Program, which follows the methodology of the NatureServe network.

The fundamental question is: Which plants, occurring in the Pinelands, deserve protection? We continue to recommend the creation of a working group to meet regularly to investigate exactly how to proceed.

We understand the Commission's reluctance to simply reference the Natural Heritage Program list. One alternative would be to use that list as a starting point and consult other sources such as the USDA Plants Database, the NatureServe website, the Mid-Atlantic Herbaria Consortium, and the Biota of North America Program. A very notable source of information, including site-specific information, has been and remains available to the Commission in the form of Natural Heritage Program reports that have been furnished to the Commission for decades in the course of specific project review processes.

The spreadsheet document I'm leaving with you today includes six sheets. The idea is to figure out what would be the most likely consequences were the Commission to adopt for protection all or most of the plant species of conservation concern that occur in the Pinelands.

Sheet One includes the original 54 species that remain protected by the Commission, plus all the state-listed Endangered species that occur in the Pinelands National Reserve (some of which coincide with the batch of 54), plus any other "plant species of concern" that occur in the Pinelands. 194 plants.

Sheet Two is what we have left if we subtract those 54 and the state-listed Endangered. The remaining plants have no official protection: 100 plants.

Sheet Three is what we have left if we subtract all the remaining S1 plants. S1 plants are destined to become state-listed Endangered and thus will become Pinelands protected when the state Endangered plant list is

updated. What's left is 88 plants.

Sheet Four is what you have left if you take out all the *Sphagnum* and Obligate wetland species. The probable consequence of protecting these is only that developers may lose the option to reduce wetland buffers. Now the list is down to 51.

Sheet Five is what we get if we scrub out all the FACW plants under the theory that they are almost always going to show up in wetlands in the Pinelands. Thus, protecting them would be very likely to have the same consequence as protecting the Obligate wetland plants. Also, a plant restricted to sea beaches is pulled out. That brings us down to 36 plants.

Sheet Six is what we get if we further refine the list based on affinity to wetlands. These are FAC plants, but available habitat descriptions indicate they are quite likely to be largely if not entirely restricted to wetlands. Probably, like *Acer rubrum*, they occur in uplands in mesic soils but are most likely to occur in wetlands in the pine barrens. This pares the total down to 30 plants.

In summary, while the entire list of species of conservation concern in the Pinelands appears imposing, only about 30 of them are likely to have significant actual regulatory impact. And these would be rarely encountered, by definition.

Finally, a word about the value of a proposed data-sharing agreement between the Commission and the DEP Office of Natural Lands Management. Seeing that this has been attempted in the past without any prospect of success, and seeing that the same impediments are in place today that were there in the past, it seems highly unlikely to succeed. The good news is that the lack of such a data-sharing agreement in no way hampers the Commission in its goal of updating and maintaining its protected plant species list.

As stated earlier, the only issue is determining which species of conservation concern occur in the Pinelands. Data housed at the Natural Heritage Program merely indicates what the Program has been able to document. It doesn't present anything like a complete picture of where all the rare plants are. Even if the Commission had all the Heritage Program data, it couldn't logically utilize that information to infer that there aren't any rare plants at any particular location. The only way to discover that is by conducting thorough and proper field surveys.

SHEET ONE

| NAME-BRIEF | A Common Name | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|---|---------------------------|----|----------|----|----|---|-------------------------------------|----------|
| <i>Aeschynomene virginica</i> | Sensitive Joint-
vetch | S1 | G2 | E | LT | Wetlands. Sandy or muddy riverbanks and fresh to brackish tidal shores. | Original; Forest; Pres;
Villages | OBL |
| <i>Agalinis fasciculata</i> | Pine Barrens | S3 | G5 | | | Wetlands. "Pine Barren bogs" -Stone. | Pres; Towns; Rural; SpecAg | FAC |
| <i>Amaranthus pumilus</i> | Seabeach | S1 | G2 | E | LT | "Sands of the sea beaches" -Stone. | Forest | FACW |
| <i>Amianthium muscitoxicum</i> | Fly-poison | S2 | G4
G5 | | | "Open woods and roadsides in moist or dry ground" - S&V. | AgPro; Forest; Rural | FAC |
| <i>Ammannia latifolia</i> | Koen's Toothcup | S1 | G5 | E | | Wetlands. "Swamps and tidal marshes" -Fernald. | Forest | OBL |
| <i>Andropogon gyrans</i> | Elliott's Bluestem | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | -- |
| <i>Arethusa bulbosa</i> | Arethusa | S2 | G5 | | | Wetlands. "Mossy, open, pineland bogs; swampy grasslands" -Hough. Often with <i>Sphagnum pulchrum</i> and <i>Gaylussacia dumosa</i> . | Villages; Forest; Pres;
SpecAg | OBL |
| <i>Aristida lanosa</i> | Wooly Three-awn | S1 | G5 | E | | "Dry, sandy or sterile soil" -Hough | RegGro | -- |
| <i>Aristida virgata</i> | Wand-like Three-
awn | S2 | G5
T4 | | | "Moist, sandy soil of low pinelands, bog edges, ditches" -Hough | Forest; Pres; Rural | FAC |
| <i>Asclepias lanceolata</i> | Smooth Orange
Milkweed | S1 | G5 | | | Wetlands. "Edges of salt or brackish marshes" -S&V. | Forest; Pres; RegGro | OBL |
| <i>Asclepias rubra</i> | Red Milkweed | S2 | G4
G5 | | | Wetlands. Pinelands swamps, boggy areas, cedar swamp openings, savannas. | Original; Forest; Pres;
SpecAg | OBL |
| <i>Calamagrostis pickeringii</i> | Pickering's
Reedgrass | S2 | G5 | E | | Wetlands. "sandy peaty barrens and sphagnous bogs" -Schuyler, 1990 | Pres; SpecAg | FACW |
| <i>Calamovilfa brevipilis</i> | Pine Barren Reed
Grass | S4 | G4 | | | Wetlands. Damp, open, sandy barrens, esp. Pitch Pine lowlands, road shoulders, and along power line rights-of-way. | Original; (Pres; Forest) | OBL |
| <i>Carex barrattii</i> | Barratt's Sedge | S4 | G4 | | | Wetlands. Wet border areas, abandoned cranberry bogs, power line rights-of-way, streamsides, roadsides | Original; (Pres; Forest) | OBL |
| <i>Carex lonchocarpa</i> | Southern Long
Sedge | S2 | G5 | | | Wetlands. Wet savannas, forests, seeps, stream banks, lakeshores, in sandy, peaty, or acidic soils - FNA | Forest; Rural | OBL |
| <i>Carex mitchelliana</i> | Mitchell's Sedge | S2 | G4 | | | Wetlands. "Swamps, floodplain forests, wet meadows, stream edges, margins of lakes and ponds, roadside ditches" -FNA | Villages; Forest; Pres | OBL |
| <i>Carex silicea</i> | Beach Sedge | S3 | G5 | | | "Sand or sandy soil near the coast" -G&C | Forest | -- |
| <i>Chenopodium berlandieri</i>
var. <i>macrocalycium</i> | Large-calyx
Goosefoot | S3 | G5
T4 | | | "Primarily restricted to sea beaches" -Snyder, 2000. | Forest | -- |

ORIGINAL 54 & state "E" are highlighted

| | | | | | | | |
|------------------------------------|-----------------------------|----|----|---|---|--|------|
| <i>Chenopodium pratericola</i> | Narrow-leaf Goosefoot | S1 | G5 | | "Dry, open sandy ground of sea beaches, lakesides, disturbed places" -Hough. Barrier island beaches (Snyder). | Forest | -- |
| <i>Chenopodium rubrum</i> | Red Goosefoot | S1 | G5 | E | "Borders of salt marshes and dune hollows" -S&V. | Forest; Pres | FACW |
| <i>Cirsium virginianum</i> | Virginia Thistle | S1 | G3 | E | "Moist savannas, pine barrens, coastal plain bogs" - FNA. "Salt marsh" -Anderson, pers. com., 2007. | Forest | FACW |
| <i>Cleistes divaricata</i> | Spreading Pogonia | S1 | G4 | E | Wetlands. Swamps, wet woods, edges of wet thickets or concealed within thickets, river banks. | Original; Pres | FAC |
| <i>Clitoria mariana</i> | Butterfly-pea | S1 | G5 | E | "Dry sandy ground" -Stone. | Forest | -- |
| <i>Coelorachis rugosa</i> | Wrinkled Jointgrass | S1 | G5 | E | Wetlands. "Low, wet soil of coastal pinelands and boggy meadows" -Hough | Rural | OBL |
| <i>Corema conradii</i> | Broom Crowberry | S2 | G4 | E | Dry. In sandy soil, in Pitch Pine communities. | Original; Forest; Pres; SpecAg; Rural; RegGro | -- |
| <i>Coreopsis rosea</i> | Rose-color Coreopsis | S2 | G3 | | Wetlands. "Wet, open sandy barrens and intermittent ponds" -Anderson. | Original; Forest; Rural; AgPro; RegGro; Villages | FACW |
| <i>Cornus foemina</i> | Stiff Dogwood | S2 | G5 | | Wetlands. "Swamps, wet woods and bottomlands" - Fernald. | RegGro | FAC |
| <i>Croton willdenowii</i> | Elliptical Rushfoil | S3 | G5 | | Dry. In sand, sandy soil, railroad embankments, and paths. | Original; Forest; Pres | -- |
| <i>Cuscuta coryli</i> | Hazel Dodder | S2 | G5 | ? | "Parasitic on various shrubs and herbs, including <i>Corylus</i> , in low, sandy, moist or dry ground of watersides, bottomlands" -Hough. | Towns; Pres | -- |
| <i>Cyperus lancastris</i> | Lancaster Flatsedge | S2 | G5 | E | Dry, sandy or loamy soil of open woods and shaded edges, meadows, fields" -Hough | Forest | FACU |
| <i>Cyperus pseudovegetus</i> | Marsh Flat Sedge | S1 | G5 | E | "Wet soil of swamps and marshes" -Hough | Forest; Pres | FACW |
| <i>Desmodium humifusum</i> | Trailing Tick-trefoil | S1 | G1 | E | Dry. "open, dry woods on sandy, acidic soils " -CPC | Forest | -- |
| <i>Desmodium laevigatum</i> | Smooth Tick-trefoil | S3 | G5 | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| <i>Desmodium nuttallii</i> | Nuttall's Tick-trefoil | S2 | G5 | | "Dry, sandy, open woods" -Fernald. | Forest | -- |
| <i>Desmodium strictum</i> | Stiff Tick-trefoil | S2 | G4 | | Dry, open woods, roadsides. | Original; Forest; Villages | -- |
| <i>Desmodium viridiflorum</i> | Velvety Tick-trefoil | S2 | G5 | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| <i>Dichanthelium aciculare</i> | Bristling Panic- | S | G5 | E | "Dry to moist sandy soil" -Hough. | Forest | FACU |
| <i>Dichanthelium</i> | Sheathed Panic- | S1 | G3 | | Wetlands: "Savannas and swamps" -Fernald. | Pres | OBL |
| <i>Dichanthelium hirstii</i> | Hirst Brothers' Panic-grass | S1 | G1 | E | Wetlands: coastal plain intermittent ponds. | Original; Pres; Rural; AgPro; | OBL |
| <i>Dichanthelium scabriusculum</i> | Sheathed Panic-grass | S3 | G4 | | Wetlands. "Wet, low ground of swamps, woods, pondsides" -Hough | Forest; Pres | OBL |

| | | | | | | | |
|---|---------------------------|-----------|----------|---|--|--|-----------|
| <i>Dichanthelium wrightianum</i> | Wright's Panic-grass | S2 | G4 | | Wetlands: "Pond margins and wet open areas in the Pine Barrens" -S&V. | Forest; Towns; Rural; Pres | OBL |
| <i>Diodia virginiana</i> | Larger Buttonweed | S3 | G5 | E | "Moist open woods and thickets" -S&V. | Forest | FACW |
| <i>Diplachne maritima</i> | Long-awn Sprangletop | S2 | G5
T3 | | Wetlands. "Wet soil of watersides, fresh or usually brackish water of marshes" -Hough | Forest | FACW |
| <i>Echinochloa muricata</i> var. <i>microstachya</i> | Rough Barnyard Grass | S2 | G5
T5 | | "Moist, open, disturbed ground, banks, ditches" -Hough. | Forest; Pres | FACW
+ |
| <i>Elatine minima</i> | Small Waterwort | S3 | G5 | | Aquatic. "Sandy or muddy margins of lakes and ponds" -S&V. | MilFed; Pres | OBL |
| <i>Eleocharis equisetoides</i> | Knotted Spike-rush | S1 | G4 | E | Wetlands. Shallow water, intermittent ponds. | Original; Forest | OBL |
| <i>Eleocharis olivacea</i> var. <i>reductiseta</i> | Bright Green Spikerush | S1 | G5
T1 | E | Wetlands. Freshwater intertidal zones of pine barrens watercourses. | Forest; Pres | |
| <i>Eleocharis quadrangulata</i> | Angled Spike-rush | S4
(?) | G5 | | Wetlands. "Shallow water of ponds and streams" -S&V. | Forest; Rural; Pres | OBL |
| <i>Eleocharis tortilis</i> | Twisted Spike-rush | S2 | G5 | E | Wetlands "Wet woods and swamps" -S&V | Forest; Pres | FACW
+ |
| <i>Equisetum variegatum</i> var. <i>variegatum</i> | Variiegated Scouring Rush | S1 | G5
T5 | E | Wetlands. "Wet thickets, bogs, and sandy shores" -Cronquist | Forest | |
| <i>Eragrostis hirsuta</i> | | S4 | G5 | E | "Dry sandy soil near the coast." --Cronquist | Forest; Pres; Rural | |
| <i>Erechtites hieraciifolia</i> var. <i>megalocarpa</i> | Large-fruit Fireweed | S2 | G5
T3 | | Wetlands. "Saline coastal marshes from Mass. to NJ" -G&C. | Forest | FACU |
| <i>Eriocaulon parkeri</i> | Parker's Pipewort | S2 | G3 | | Aquatic. "In shallow water of estuaries and muddy tidal flats" S&V | Villages; Forest; RegGro; Rural; SpecAg; Pres | OBL |
| <i>Eryngium aquaticum</i> var. <i>aquaticum</i> | Marsh Rattlesnake-master | S3 | G4
T4 | | Wetlands "Salt to brackish water and wet ground of marshes, tidewaters, ponds, bogs" -Hough | Forest; RegGro; Towns; Rural; SpecAg; Pres | OBL |
| <i>Eupatorium aromaticum</i> var. <i>aromaticum</i> | Smaller White Snake-root | S1 | G5
T5 | | Dry. "Sandy pinelands, open woods and roadsides" -S&V. | Forest | -- |
| <i>Eupatorium capillifolium</i> | Dog-fennel Thoroughwort | S4 | G5 | E | "Well-drained, open ground of shaded woods edges, pastures, old fields, roadsides" -Hough. "Moist clearings and roadsides" -S&V. | Pres; Forest; Rural; RegGro | FACU- |
| <i>Eupatorium coelestinum</i> | Mist-flower | S4
(?) | G5 | | Wetlands "Borders of salt marshes and moist woods" -S&V | Forest; Towns; Pres | FAC |
| <i>Eupatorium resinosum</i> | Pine Barren Boneset | S2 | G3 | E | Wetlands. Open sphagnum bogs and streamside savannas, old cranberry bogs. | Original; Forest; Pres; Rural; AgPro; MilFed; RegGro; Villages | OBL |
| <i>Euphorbia corollata</i> | Flowering Spurge | S1 | G5 | | "Dry, open ground of woods and shaded edges, old fields, meadows" -Hough. | Forest | -- |

| | | | | | | | | |
|--|----------------------------|----|----------|---|----|--|---|--------|
| <i>Fimbristylis caroliniana</i> | Carolina Fimbry | S2 | G4 | | | "Dry to moist, open, sandy soil of pinelands, dune hollows; in brackish or saline conditions" -Hough | Forest | FACW + |
| <i>Fimbristylis castanea</i> | Chestnut Sedge | S2 | G5 | | | Wetlands "Salt to brackish water of marshes" -Hough | Forest; Pres | OBL |
| <i>Fimbristylis puberula</i> var. <i>puberula</i> | Hairy Fimbry | S1 | G5
T5 | | | "Moist or dry open ground in the Pine Barrens" -S&V. | Pres | OBL |
| <i>Fuirena squarrosa</i> | Hairy Umbrella-sedge | S3 | G4
G5 | | | Wetlands. "Wet, sandy soil; salt marsh edges" -Hough | Forest | OBL |
| <i>Gentiana autumnalis</i> | Pine Barren Gentian | S3 | G3 | | | Wetlands. Moist, open, sandy areas, roadsides, pitch pine lowlands, stream banks, in the Pine Barrens. | Original; Forest; Pres; Rural; SpecAg; MilFed; RegGro; Villages | FACW + |
| <i>Gentiana saponaria</i> var. <i>saponaria</i> | Soapwort Gentian | S3 | G5 | | | Wetlands. "Wet, sandy, open ground of bogs, watersides, wooded slopes and edges" -Hough | Forest; SpecAg; Pres | FACW |
| <i>Gratiola pilosa</i> | Hairy Hedge-hyssop | S2 | G5
? | | | Dry to moist salt marsh edges, open woods, edges -Hough | Forest | FACU |
| <i>Helonias bullata</i> | Swamp-pink | S3 | G3 | E | LT | Wetlands. On hummocks and fringes of swamps, especially in undisturbed headwaters. | Original; Forest; Pres; Rural; SpecAg; AgPro; RegGro; Villages | OBL |
| <i>Honkenya peploides</i> var. <i>robusta</i> | Seabeach Sandwort | S1 | G5
T5 | E | | "Sea beaches above high tide line all along the coast" -Stone. | Forest | FACU |
| <i>Hottonia inflata</i> | Featherfoil | S1 | G4 | E | | Aquatic. "Quiet waters of streams, ponds and swamps" -S&V. | Forest | OBL |
| <i>Hydrocotyle verticillata</i> var. <i>verticillata</i> | Whorled Marsh-pennywort | S2 | G5
T5 | | | Wetlands. "Marshes and pond shores" -S&V. | Forest; Towns; Pres | OBL |
| <i>Juncus caesariensis</i> | New Jersey Rush | S3 | G2
G3 | E | | Wetlands. Open sphagnum bogs, streamside savannas, cedar swamps. | Original; Pres; Forest; Rural; SpecAg; MilFed | OBL |
| <i>Juncus greenei</i> | Green's Rush | S2 | G5 | | | "Dry or moist sandy soil" -S&V | MilFed | FAC |
| <i>Lactuca graminifolia</i> var. <i>graminifolia</i> | Grassleaf Lettuce | S | G5
?T | | | "Sandy woods and clearings" -Fernald. | Pres | -- |
| <i>Lactuca hirsuta</i> var. <i>sanguinea</i> | Hairy Tall Lettuce | S2 | G5
?T | | | "Dry open woods & clearings" -Fernald. | Pres | |
| <i>Lechea tenuifolia</i> | Narrow-leaf | S1 | G5 | E | | "Dry, open woods" -S&V. | Forest | -- |
| <i>Lemna perpusilla</i> | Minute Duckweed | S1 | G5 | E | | Aquatic. "Ponds and slow streams" -S&V. | Forest | OBL |
| <i>Lespedeza stuevei</i> | Stueve's Downy Bush-clover | S2 | G4
? | | | Dry. "Sandy ground along the edges of woods and thickets" -Stone. | RegGro | -- |
| <i>Linum intercursum</i> | Sandplain Flax | S1 | G4 | E | | "Dry or moist, sandy, open ground of thin woods and shaded edges" -Hough | Forest; SpecAg; RegGro | -- |

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|--|------------------------------|----|----|--------|---|---|--------|
| <i>Liparis liliifolia</i> | Lilia-leaf Twayblade | S4 | G5 | | "Loamy or sandy woods and clearings" -Fernald. In the Pinelands it is most likely to be found in non-typical, enriched, dry (and sometimes damp) soils. | Original; (Forest) | FACU- |
| <i>Liparis loeselii</i> | Loesel's Twayblade | S4 | G5 | | Moist to wet. Ordinarily in limestone wetlands, but may be found in the Pinelands in enriched areas. - Snyder, pers. com. May show up at old homesites and furnace sites, around foundations. | Original; (Forest) | FACW |
| <i>Listera australis</i> | Southern Twayblade | S4 | G4 | | Wetlands. Shaded boggy areas, wet woods, hardwood swamps, often in sphagnum. | Original; (Forest) | FACW |
| <i>Lobelia boykinii</i> | Boykin's Lobelia | S | G1 | E | Aquatic; in ponds and swamps. | Forest; Rural; AgPro; | OBL |
| <i>Lobelia canbyi</i> | Canby's Lobelia | S3 | G4 | | Wetlands. "Wet, sandy ground of swamps, pineland bogs" -Hough | Original; Forest; Pres; Rural; SpecAg; MilFed; | OBL |
| <i>Ludwigia hirtella</i> | Hairy Ludwigia | S1 | G5 | | Wetlands. Damp, open, sandy barrens, Pitch Pine Lowlands, boggy areas, streamside savannas. | Original; Forest; Pres | OBL |
| <i>Ludwigia linearis</i> var. <i>linearis</i> | Linear-leaved Ludwigia | S2 | G5 | TN | Wetlands. Wet soil, muddy shores, shallow water, Pitch Pine Lowlands. | Original; Forest; Pres; Rural; AgPro | OBL |
| <i>Lupinus perennis</i> var. <i>perennis</i> | Wild Lupine | S3 | G5 | T5 | "Dry, open woods, clearings and openings" -Fernald | Forest; RegGro | -- |
| <i>Lycopodiella caroliniana</i> | Slender Clubmoss | S4 | G5 | (?) T4 | Wetlands. "Moist sandy or peaty bogs and damp sandy acid depressions..." -M&F. | Pres | FACW + |
| <i>Lygodium palmatum</i> | Climbing Fern | S2 | G4 | | Wetlands. Moist thickets and woods in acid soil. | Original; Forest; Pres; Rural; AgPro; Villages | FACW |
| <i>Lythrum lineare</i> | Linear-leaved Loosestrife | S3 | G5 | | Wetlands. "Brackish marshes on the coastal plain." -- Cronquist | Forest; RegGro; Pres | |
| <i>Malus angustifolia</i> var. <i>puberula</i> | Spiny Wild Crabapple | S2 | G5 | ?T | "Low, open ground of shaded woods edges, old fields, fencerows, bottomlands" -Hough. | Forest | -- |
| <i>Muhlenbergia torreyana</i> | Pine Barren Smoke-grass | S3 | G3 | | Wetlands. Damp, open, sandy barrens, peaty bogs, swales, streamside savannas. | Original; Forest; Pres; Rural; SpecAg; RegGro; Villages | FACW + |
| <i>Myriophyllum tenellum</i> | Slender Water- | S1 | G5 | E | Aquatic. | Forest | OBL |
| <i>Nabalus autumnalis</i> | Pine Barren Rattlesnake-root | S2 | G4 | (?) G5 | Moist, open, sandy areas, roadsides, Pitch Pine Lowlands. | Original; omit; Forest; Pres; Rural; SpecAg; MilFed | FAC |
| <i>Narthecium americanum</i> | Bog Asphodel | S2 | G2 | E | Wetlands. Open stream corridors, streamside savannas, openings in cedar swamps. | Original; Forest; Pres; Rural; SpecAg | FACW + |
| <i>Nymphoides cordata</i> | Floating Heart | S3 | G5 | | Aquatic. Ponds, sluggish streams, slack waters of rivers, intermittent ponds. | Original; Forest; Pres; Rural; AgPro | OBL |

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|---|--------------------------|--------|---------------|---|--|---|-----------|
| <i>Oenothera oakesiana</i> | Oakes' Evening Primrose | S3 | G4
G5 | | Dry. "Fields, roadsides, prairies, and waste places" - G&C. | Forest | -- |
| <i>Onosmodium virginianum</i> | Virginia False Gromwell | S
H | G4 | E | "Well-drained, dry, open, sandy ground of thin woods, barrens, rarely pinelands" -Hough | Forest | -- |
| <i>Ophioglossum pusillum</i> | Northern Adder's-tongue | S3 | G5 | | Wetlands. "Wet meadows, edges of swamps, and moist open woods" -M&F. | Pres | OBL |
| <i>Ophioglossum vulgatum</i> | Southern Adder's-tongue | S1 | G5 | E | "Moist loamy wooded slopes and creek banks" - M&F. | Forest; Pres; SpecAg | FACW |
| <i>Osmunda cinnamomea</i>
var. <i>glandulosa</i> | Glandular Cinnamon Fern | S2 | G5
TN
R | | Wetlands. Presumably, the same as var. <i>cinnamomea</i> , "Wet woods, swamps, open marshes, bogs, and roadside ditches" -M&F. | AgPro; Forest; Rural; | FACW |
| <i>Panicum hemitomon</i> | Maiden-cane | S2 | G5
? | | Wetlands: swamps, intermittent ponds, swales. | Original; Forest | FACW
+ |
| <i>Paspalum dissectum</i> | Mudbank Crown-grass | S2 | G4
? | | Wetlands. "Shallow water, pond margins and other wet places" -S&V. | MilFed; Towns; Rural; AgPro | OBL |
| <i>Paspalum floridanum</i> | Florida Paspalum | S3 | G5 | | "Sandy, usually moist, open ground; brackish marshes" -Hough. | Villages; Forest; RegGro | FACW |
| <i>Phaseolus polystachios</i>
var. <i>polystachios</i> | Wild Kidney Bean | S2 | G5
T5
? | | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes coastal islands" - Hough | Forest | -- |
| <i>Phoradendron leucarpum</i> | Mistletoe | S4 | G5 | | Wetlands. Hardwood wetlands, usually on gum trees, occasionally on maples. | Original; Forest | OBL |
| <i>Pinus taeda</i> | Loblolly Pine | S3 | G5 | | "Moist sandy woods" -S&V. Also in ecotonal areas between hammocks in salt marsh. | Forest; Towns; Rural; Pres | FAC- |
| <i>Pityopsis falcata</i> | Sickle-leaf Golden-aster | S3 | G3
G4 | | Dry, open sand, sandy roadsides, and sand mining areas. | Original; Forest; Pres; Rural; SpecAg; MilFed; RegGro; Villages | -- |
| <i>Plantago maritima</i> var. <i>juncoides</i> | Seaside Plantain | S2 | G5
T5 | | Wetlands. "Salt or brackish conditions, in water or wet soil of marshes, swamps, beaches, tidal streams, headlands" -Hough | Forest | OBL |
| <i>Platanthera ciliaris</i> | Yellow Fringed | S2 | G5 | | Wetlands. Sandy, peaty boggy areas, swales. | Original; Forest | FACW |
| <i>Platanthera cristata</i> | Crested Yellow Orchid | S3 | G5 | | Wetlands. Damp, open boggy areas, woods, cedar swamps, roadsides. | Original; Forest; Pres; Rural; SpecAg | FACW
+ |
| <i>Platanthera integra</i> | Yellow Fringeless Orchid | S1 | G3
G4 | E | Wetlands. Open sphagnum bogs, wet pine barrens, streamside savannas, moist to wet sedgy areas | Original; Pres; SpecAg | OBL |
| <i>Polygala mariana</i> | Maryland Milkwort | S2 | G5 | | Dry to moist sandy soil. | Original; Pres | FACW |

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| <i>Scleria reticularis</i> | Reticulated Nut-rush | S4 | G4 | | Damp, sandy soil, savannas, and intermittent ponds. | Original: (Pres) | |
| <i>Sclerolepis uniflora</i> | Bog Buttons | S2 | G3 | | Aquatic. In shallow water of open boggy areas, savannas, ponds, and slack water of rivers. | Original; Forest: Pres | OBL |
| <i>Senecio tomentosus</i> | Woolly Ragwort | S2 | G4
G5 | | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, pineland edges - Hough. | Forest | FACU |
| <i>Sesuvium maritimum</i> | Seabeach Purslane | S2 | G5 | | Wetlands. "Sea beaches, dune hollows and salt flats" -S&V. | Forest | FACW |
| <i>Setaria magna</i> | Giant Bristlegrass | S2 | G4
G5 | | Wetlands. "Low, wet, disturbed soil in fresh to brackish conditions" -Hough. | Forest | FACW |
| <i>Sisyrinchium fuscatum</i> | Sand-plain Blue-eyed-grass | S1 | G5
? | | "Dry, sandy soils..." -Hough. | Pres | -- |
| <i>Smilax laurifolia</i> | Laurel-leaved Greenbrier | S3 | G5
(?) | | Wetlands. "Low, wet ground of woods, especially in cedar swamps" -Hough | Villages; Forest; SpecAg; Pres; Rural | OBL |
| <i>Solidago elliotii</i> | Elliott's Goldenrod | S3 | G5 | | Wetlands. "Well-drained ground with a constant high water table such as on hummocks in fresh or brackish water..." -Hough. | Forest | OBL |
| <i>Solidago rugosa</i> ssp. <i>rugosa</i> var. <i>sphagnophila</i> | Wrinkle-leaved Goldenrod | S3 | G5
T3 | | Wetlands. "swampy places" --Cronquist | Rural | FAC |
| <i>Solidago stricta</i> | Wand-like Goldenrod | S3 | G5 | | Wetlands. Damp, sandy pinelands and roadsides. | Original; Forest; Pres; Rural; SpecAg; MilFed | FACW |
| <i>Solidago tarda</i> | Late Goldenrod | S3 | G4 | | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Solidago uliginosa</i> var. <i>uliginosa</i> | Few-rayed Goldenrod | S3 | G4
G5 | | Wetlands | Forest; Towns | |
| <i>Sphagnum cyclophyllum</i> | Sphagnum | S3 | G3 | | Wetlands | Forest; Pres; SpecAg | -- |
| <i>Sphagnum macrophyllum</i> | Sphagnum | S2 | G3 | | Wetlands | Forest; Pres; Villages | |
| <i>Sphagnum perichaetiale</i> | Sphagnum | S2 | G5 | | Wetlands | Pres | -- |
| <i>Sphagnum portoricense</i> | Sphagnum | S2 | G5 | | Wetlands | Forest; Towns; Pres; SpecAg | -- |
| <i>Sphagnum tenellum</i> | Sphagnum | S1 | G5 | | Wetlands | Pres | -- |
| <i>Spiranthes laciniata</i> | Lace-lip Ladies'-tresses | S1 | G4
G5 | E | Wetlands. Boggy areas, marshes, swamps, meadows, especially savannas. | Pres | OBL |
| <i>Spiranthes odorata</i> | Fragrant Ladies'- | S2 | G5 | | Wetlands. Open, moist to wet areas. | Forest; Towns; Rural | OBL |
| <i>Spiranthes tuberosa</i> | Little Ladies'-tresses | S3 | G5 | | Dry, sandy fields, openings or edges of woods, sometimes in turf. | Original; Forest; Pres; SpecAg | -- |
| <i>Sporobolus clandestinus</i> | Rough Dropseed | S3 | G5 | | Dry, sandy to rocky ground of woods edges, meadows" -Hough. | Forest | -- |

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| <i>Polygala polygama</i> | Racemed Milkwort | S2 | G5 | | | "Dry, usually sandy, open ground of fields, woods and shaded edges" -Hough. | Forest; Pres | UPL |
| <i>Polygonum buxiforme</i> | Box Knotweed | S3 | G5 | | | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of marshes and dunes" - FNA. | Forest | -- |
| <i>Polygonum densiflorum</i> | Dense-flower Knotweed | S1 | G5 | E | | "Shallow water or wet ground of shaded swamps, pool edges, woods edges" -Hough. | Forest | OBL |
| <i>Polygonum glaucum</i> | Sea-beach | S1 | G3 | E | | "Sea beaches, dune hollows and salt flats" -S&V. | Forest | FACU |
| <i>Potamogeton confervoides</i> | Alga-like Pondweed | S2 | G5 | | | Aquatic. "Restricted to ponds and streams in the Pine Barrens ..." -Stone. | Villages; Forest; Rural; Pres | OBL |
| <i>Potamogeton oakesianus</i> | Oakes' Pondweed | S2 | G5 | | | Aquatic. "Pine Barren ponds" -S&V. | Forest; Rural; Pres | OBL |
| <i>Proserpinaca intermedia</i> | MacKenzie's Mermaid-weed | S3 | G4 | | ?Q | Aquatic, or saturated wetlands. "Shallow water of marshes, ditches, pond edges" -Hough. | Pres; Forest | OBL |
| <i>Prunus angustifolia</i> var. <i>angustifolia</i> | Chickasaw Plum | S2 | G5 | | | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres | -- |
| <i>Puccinellia fasciculata</i> | Saltmarsh Alkali Grass | S2 | G3 | | G5 | Wetlands. "Wet soil or water of salt marsh borders, beaches" -Hough | Forest | OBL |
| <i>Pycnanthemum setosum</i> | Awnead Mountain-mint | S3 | G4 | | | "Dry or moist, open, sandy ground of thin woods, fields, salt marshes, beaches" -Hough | Villages; Forest; RegGro; Towns; Rural; Pres | FACU |
| <i>Quercus michauxii</i> | Basket Oak | S3 | G5 | | | Wetlands. "Swamp margins and stream banks" - S&V. | Forest; Rural | FACW |
| <i>Rhexia aristosa</i> | Awnead Meadow- | S1 | G3 | E | | Wetlands. Intermittent ponds in the Pine Barrens. | Original; Forest; Rural | OBL |
| <i>Rhexia mariana</i> var. <i>ventricosa</i> | Showy Meadow-beauty | S2 | G5 | E | T4 | Wetlands. "inactive sand and gravel pits" and "wooded swamps" Snyder, 2000. | Forest | -- |
| <i>Rhododendron atlanticum</i> | Dwarf Azalea | S2 | G4 | | | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Rhynchospora cephalantha</i> var. | Large-head Beaked-rush | S3 | G5 | | T4 | Wetlands. Wet savannas. | Original; Pres; Rural; SpecAg; MilFed | OBL |
| <i>Rhynchospora filifolia</i> | Thread-leaf Beaked-rush | S1 | G5 | E | | Wetlands. "Boggy areas in pinelands" -S&V | Forest | FAC |
| <i>Rhynchospora inundata</i> | Slender Horned-rush | S2 | G4 | | | Wetlands. Swamps, pond bottoms, intermittent ponds, wet depressions. | Original; Forest; Pres; SpecAg; AgPro | OBL |
| <i>Rhynchospora knieskernii</i> | Knieskern's Beaked-rush | S2 | G2 | E | LT | Wetlands. Damp, open, sandy barrens, or in standing water; where soil has clay or loam substrates; often in disturbed sites. | Original; RegGro; Forest; Pres; Rural; SpecAg; AgPro; MilFed | OBL |
| <i>Rhynchospora leptocarpa</i> | | S1 | G3 | | | Wetlands. | SpecAg; Pres | |
| <i>Rhynchospora microcephala</i> | Small-head Beaked-rush | S2 | G5 | E | T5 | Wetlands. Wet, acid soil, boggy areas, swamps. | Forest; Pres; Rural | FACW + |

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| <i>Rhynchospora nitens</i> | Short-beaked Bald-rush | S1 | G4
? | | Wetlands. "Moist to wet sands or peats of stream banks, pond shores, depressions in savannas, marshes" -FNA. | Forest; RegGro; Pres | OBL |
| <i>Rhynchospora oligantha</i> | Few-flower Beaked- | S2 | G4 | | Wetlands. "Pine Barren bogs" -S&V. | SpecAg; Pres | OBL |
| <i>Rhynchospora pallida</i> | Pale Beaked-rush | S3 | G3 | | Wetlands. Open boggy areas, pitch pine lowlands, ecotonal areas, turf cuts. | Forest; MilFed; RegGro; Towns; Rural; Pres; SpecAg | OBL |
| <i>Rhynchospora rariflora</i> | Rare-flower Beaked-rush | S1 | G5 | E | Wetlands. Open boggy areas, wet grasslands. | Forest | OBL |
| <i>Rhynchospora scirpoides</i> | Long-beak Bald-rush | S2 | G4 | | Wetlands. "Moist to wet sands or peats of banks of streams and ditches, pond and lakeshores, depressions in savannas, marshes" -FNA. | AgPro; Forest; Pres | OBL |
| <i>Rotala ramosior</i> | Rotala | S3 | G5 | | Wetlands. "Moist open soil" -S&V. | Forest; RegGro; Pres | OBL |
| <i>Rubus novocaesarius</i> | Tuckahoe Dewberry | S1 | G1 | | ? | Villages | -- |
| <i>Sabatia campanulata</i> | Slender Marsh-pink | S3 | G5 | | Wetlands. "Wet, low, sandy or peaty ground in salt or brackish conditions" -Hough. | Forest; RegGro; Pres | FACW |
| <i>Sabatia dodecandra</i> var. <i>dodecandra</i> | Large Marsh-pink | S2 | G5
?T | | Wetlands. "Saline or brackish (rarely fresh) water of tidal marshes, watersides" -Hough | Forest | OBL |
| <i>Sagittaria calycina</i> var. <i>spongiosa</i> | Tidal Arrowhead | S2 | G5
T4 | | Wetlands. "Brackish to freshwater tidal mud flats and salt marshes." -FNA | Pres | OBL |
| <i>Sagittaria subulata</i> | Awl-leaf Arrowhead | S3 | G4 | | Wetlands. "Tidal mud of fresh to brackish waters" -S&V. | Forest; Pres | OBL |
| <i>Sagittaria teres</i> | Slender Arrowhead | S2 | G3 | E | Aquatic. "Shallow ponds" -S&V | Forest; Rural; AgPro; RegGro | OBL |
| <i>Schizaea pusilla</i> | Curly-grass Fern | S3 | G3
G4 | | Wetlands. "Moist, sandy spots and on hummocks in bogs and stream and river banks, with cedar" -Anderson. | Original; Pres; Forest; Rural; SpecAg; RegGro | OBL |
| <i>Schoenoplectus maritimus</i> | Saltmarsh Bulrush | S1 | G5 | E | Wetlands. Fresh, saline, or alkaline swamps & marshes. | Forest; RegGro | OBL |
| <i>Schoenoplectus novae-angliae</i> | New England Bulrush | S2 | G5
(?) | | Wetlands. Brackish tidal zones. | RegGro; Pres | OBL |
| <i>Schwalbea americana</i> | Chaff-seed | S1 | G2 | E LE | Moist to dry, open, sandy pinelands. | Original; Pres | FACU |
| <i>Scirpus longii</i> | Long's Wool-grass | S2 | G3 | E | Wetlands. Damp, open, sandy barrens and depressions. | Original; Pres; SpecAg; AgPro | OBL |
| <i>Scleria minor</i> | Slender Nut-rush | S4 | G4 | | Wetlands. Damp sandy or peaty soil. | Original; (Pres) | FACW |
| <i>Scleria pauciflora</i> var. <i>caroliniana</i> | Carolina Nut-rush | S2 | G5
T4
T5 | | Uplands and wetlands. "Dry to mostly wet pinelands, savannas, mesic woods, meadows, bogs, and prairies" -FNA. | RegGro; Towns; SpecAg; Pres; | FACU
+ |

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| <i>Sporobolus compositus</i> var. <i>compositus</i> | Composite Dropseed | S2 | G5
T5 | | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylisma pickeringii</i> var. <i>pickeringii</i> | Pickering's Morning-glory | S1 | G4
T3 | E | Dry sands of upland Pitch Pine forests. | Original; Pres; Forest; SpecAg | -- |
| <i>Stylosanthes biflora</i> | Pencil-flower | S3 | G5 | | Dry. "Open sandy ground, edges of woods" -Stone. | Forest; RegGro; Pres; Villages | -- |
| <i>Suaeda calceoliformis</i> | American Seablight | S3 | G5 | | Wetlands. "Saline or alkaline soil" -G&C. Salt marshes. | Forest | -- |
| <i>Symphotrichum concolor</i> var. <i>concolor</i> | Eastern Silvery Aster | S1 | G5
T5 | | Dry, sandy, barren open woods. | Original; Pres; SpecAg | -- |
| <i>Taxodium distichum</i> | Bald Cypress | S2
? | G5 | | Wetlands "Brownwater riverine and lacustrine margins and swamps, occasionally in brackish water" -Cronquist | Pres | |
| <i>Toxicodendron</i> | Poison Oak | S3 | G5 | | "Dry, sandy ground of woods" -Hough. | Villages | FACU |
| <i>Triadenum walteri</i> | Walter's St. John's- | S1 | G5 | E | Wetlands. "Swamps and marshes" -G&C. | Forest | OBL |
| <i>Triantha racemosa</i> | False Asphodel | S1 | G5 | E | Wetlands. Wet, open boggy areas, savannas, in the central Pine Barrens. | Original; Pres; SpecAg | OBL |
| <i>Utricularia biflora</i> | Two-flower Bladderwort | S1 | G5 | E | Wetlands. Aquatic; "shallow, quiet water in ponds, ditches, pools" -Hough | Forest; Pres; Rural; AgPro; RegGro | OBL |
| <i>Utricularia gibba</i> | Humped | S | G5 | | Aquatic. Shallow water. | Original; (Forest) | OBL |
| <i>Utricularia intermedia</i> | Flat-leaved | S3 | G5 | | Aquatic, or on wet shores. | Forest | OBL |
| <i>Utricularia olivacea</i> | Dwarf White Bladderwort | S1 | G4
.1 | E | Aquatic. Shallow water, ponds. | Original; Forest | OBL |
| <i>Utricularia purpurea</i> | Purple Bladderwort | S4 | G5 | | Aquatic, or on mud in impoundments, ponds, or slack water areas of rivers and streams. | Original; Forest; Pres; Rural; SpecAg; RegGro | OBL |
| <i>Utricularia resupinata</i> | Reversed Bladderwort | S2 | G4 | E | Aquatic, or on muddy soil, at the edge of ponds and impoundments. | Original; Forest; Pres; Rural; SpecAg; RegGro | OBL |
| <i>Uvularia puberula</i> var. <i>nitida</i> | Pine Barren Bellwort | S1 | G5
T3 | E | Dry to damp. "Moist soil of swamp edges in the pinelands" -Hough. Often in thickets. | Forest; Pres; Rural; SpecAg; AgPro; RegGro; Villages | FACU |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | Coast Arrowwood | S2 | G5
T4 | | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | Britton's Coast Violet | S3 | G4
G5 | | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |
| <i>Xyris caroliniana</i> | Sand Yellow-eyed-grass | S1 | G4
G5 | E | Moist to well-drained peaty, sandy soil, often in the driest zones of Pitch Pine Lowlands. Name is confused in older literature with <i>X. difformis</i> . | Original; Pres | FACW |

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| Xyris chapmanii | | S1 | G3 | | Wetlands. "seepage bogs in areas of copious lateral seepage in deep muck soils" --Weakley | SpecAg; Pres | |
| Xyris fimbriata | Fringed Yellow-eyed-grass | S1 | G5 | E | Wetlands. "Pine Barren bogs and swamps" -S&V | Pres | OBL |
| Zigadenus leimanthoides | Death Camas | S1 | G4 | E | Wetlands. "Wet meadows, open swamps and bogs" -S&V | Pres; RegGro | OBL |

SHEET TWO

| NAME-BRIEF | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|--|-----|------------|----|----|---|--------------------------------|----------|
| Agalinis fasciculata | S3 | G5 | | | Wetlands. "Pine Barren bogs" -Stone. | Pres; Towns; Rural; SpecAg | FAC |
| Amianthium muscitoxicum | S2 | G4G5 | | | "Open woods and roadsides in moist or dry ground" -S&V. | AgPro; Forest; Rural | FAC |
| Andropogon gyrans | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | -- |
| Arethusa bulbosa | S2 | G5 | | | Wetlands. "Mossy, open, pineland bogs; swampy grasslands" -Hough. Often with Sphagnum pulchrum and Gaylussacia dumosa. | Villages; Forest; Pres; SpecAg | OBL |
| Aristida virgata | S2 | G5T4
T5 | | | "Moist, sandy soil of low pinelands, bog edges, ditches" -Hough | Forest; Pres; Rural | FAC |
| Asclepias lanceolata | S1 | G5 | | | Wetlands. "Edges of salt or brackish marshes" -S&V. | Forest; Pres; RegGro | OBL |
| Carex lonchocarpa | S2 | G5 | | | Wetlands. Wet savannas, forests, seeps, stream banks, lakeshores, in sandy, peaty, or acidic soils -FNA | Forest; Rural | OBL |
| Carex mitchelliana | S2 | G4 | | | Wetlands. "Swamps, floodplain forests, wet meadows, stream edges, margins of lakes and ponds, roadside ditches" -FNA | Villages; Forest; Pres | OBL |
| Carex silicea | S3 | G5 | | | "Sand or sandy soil near the coast" -G&C | Forest | -- |
| Chenopodium berlandieri var. macrocalycium | S3 | G5T4 | | | "Primarily restricted to sea beaches" -Snyder, 2000. | Forest | -- |
| Chenopodium pratericola | S1? | G5 | | | "Dry, open sandy ground of sea beaches, lakesides, disturbed places" -Hough. Barrier island beaches (Snyder). | Forest | -- |
| Cornus foemina | S2 | G5 | | | Wetlands. "Swamps, wet woods and bottomlands" -Fernald. | RegGro | FAC |
| Cuscuta coryli | S2 | G5? | | | "Parasitic on various shrubs and herbs, including Corylus, in low, sandy, moist or dry ground of watersides, bottomlands" -Hough. | Towns; Pres | -- |
| Desmodium laevigatum | S3 | G5 | | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| Desmodium nuttallii | S2 | G5 | | | "Dry, sandy, open woods" -Fernald. | Forest | -- |
| Desmodium viridiflorum | S2 | G5? | | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| Dichantherium cryptanthum | S1 | G3Q | | | Wetlands: "Savannas and swamps" -Fernald. | Pres | OBL |
| Dichantherium scabriusculum | S3 | G4 | | | Wetlands. "Wet, low ground of swamps, woods, pondsides" -Hough | Forest; Pres | OBL |

ORIGINAL 54 & state E are extracted

S1 is highlighted

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|---|-------|-------------|--|--|---|-------|
| <i>Dichanthelium wrightianum</i> | S2 | G4 | | Wetlands: "Pond margins and wet open areas in the Pine Barrens" -S&V. | Forest; Towns; Rural; Pres | OBL |
| <i>Diplachne maritima</i> | S2 | G5T3
T4Q | | Wetlands. "Wet soil of watersides, fresh or usually brackish water of marshes" -Hough | Forest | FACW |
| <i>Echinochloa muricata</i> var. <i>microstachya</i> | S2 | G5T5 | | "Moist, open, disturbed ground, banks, ditches" -Hough. | Forest; Pres | FACW+ |
| <i>Elatine minima</i> | S3 | G5 | | Aquatic. "Sandy or muddy margins of lakes and ponds" -S&V. | MilFed; Pres | OBL |
| <i>Eleocharis quadrangulata</i> | S4(?) | G5 | | Wetlands. "Shallow water of ponds and streams" -S&V. | Forest; Rural; Pres | OBL |
| <i>Erechtites hieraciifolia</i> var. <i>megalocarpa</i> | S2 | G5T3 | | Wetlands. "Saline coastal marshes from Mass. to NJ" -G&C. | Forest | FACU |
| <i>Eriocaulon parkeri</i> | S2 | G3 | | Aquatic. "In shallow water of estuaries and muddy tidal flats" S&V | Villages; Forest; RegGro; Rural; SpecAg; Pres | OBL |
| <i>Eryngium aquaticum</i> var. <i>aquaticum</i> | S3 | G4T4 | | Wetlands "Salt to brackish water and wet ground of marshes, tidewaters, ponds, bogs" -Hough | Forest; RegGro; Towns; Rural; SpecAg; Pres | OBL |
| <i>Eupatorium aromaticum</i> var. <i>aromaticum</i> | S1 | G5T5 | | Dry. "Sandy pinelands, open woods and roadsides" -S&V. | Forest | -- |
| <i>Eupatorium coelestinum</i> | S4(?) | G5 | | Wetlands "Borders of salt marshes and moist woods" -S&V | Forest; Towns; Pres | FAC |
| <i>Euphorbia corollata</i> | S1 | G5 | | "Dry, open ground of woods and shaded edges, old fields, meadows" -Hough. | Forest | -- |
| <i>Fimbristylis caroliniana</i> | S2 | G4 | | "Dry to moist, open, sandy soil of pinelands, dune hollows; in brackish or saline conditions" -Hough | Forest | FACW+ |
| <i>Fimbristylis castanea</i> | S2 | G5 | | Wetlands "Salt to brackish water of marshes" -Hough | Forest; Pres | OBL |
| <i>Fimbristylis puberula</i> var. <i>puberula</i> | S1 | G5T5 | | "Moist or dry open ground in the Pine Barrens" -S&V. | Pres | OBL |
| <i>Fuirena squarrosa</i> | S3 | G4G5 | | Wetlands. "Wet, sandy soil; salt marsh edges" -Hough | Forest | OBL |
| <i>Gentiana saponaria</i> var. <i>saponaria</i> | S3 | G5 | | Wetlands. "Wet, sandy, open ground of bogs, watersides, wooded slopes and edges" -Hough | Forest; SpecAg; Pres | FACW |
| <i>Gratiola pilosa</i> | S2 | G5? | | Dry to moist salt marsh edges, open woods, edges -Hough | Forest | FACU |

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|--|-------|-------------|--|-----------------------------|-------|
| Hydrocotyle verticillata var. verticillata | S2 | G5T5 | Wetlands. "Marshes and pond shores" -S&V. | Forest; Towns; Pres | OBL |
| Juncus greenei | S2 | G5 | "Dry or moist sandy soil" -S&V | MilFed | FAC |
| Lactuca graminifolia var. graminifolia | SU | G5?T
3T5 | "Sandy woods and clearings" -Fernald. | Pres | -- |
| Lactuca hirsuta var. sanguinea | S2 | G5?T
5? | "Dry open woods & clearings" -Fernald. | Pres | -- |
| Lespedeza stuevei | S2 | G4? | Dry. "Sandy ground along the edges of woods and thickets" -Stone. | RegGro | -- |
| Lupinus perennis var. perennis | S3 | G5T5
? | "Dry, open woods, clearings and openings" -Fernald | Forest; RegGro | -- |
| Lycopodiella caroliniana | S4(?) | G5T4 | Wetlands. "Moist sandy or peaty bogs and damp sandy acid depressions..." -M&F. | Pres | FACW+ |
| Lythrum lineare | S3 | G5 | Wetlands. "Brackish marshes on the coastal plain." --Cronquist | Forest; RegGro; Pres | |
| Malus angustifolia var. puberula | S2 | G5?T
2T4 | "Low, open ground of shaded woods edges, old fields, fencerows, bottomlands" -Hough. | NHP; Forest | -- |
| Oenothera oakesiana | S3 | G4G5
Q | Dry. "Fields, roadsides, prairies, and waste places" -G&C. | Forest | -- |
| Ophioglossum pusillum | S3 | G5 | Wetlands. "Wet meadows, edges of swamps, and moist open woods" -M&F. | Pres | OBL |
| Osmunda cinnamomea var. glandulosa | S2 | G5TN
R | Wetlands. Presumably, the same as var. cinnamomea, "Wet woods, swamps, open marshes, bogs, and roadside ditches" -M&F. | AgPro; Forest; Rural; | FACW |
| Paspalum dissectum | S2 | G4? | Wetlands. "Shallow water, pond margins and other wet places" -S&V. | MilFed; Towns; Rural; AgPro | OBL |
| Paspalum floridanum | S3 | G5 | "Sandy, usually moist, open ground; brackish marshes" -Hough. | Villages; Forest; RegGro | FACW |
| Phaseolus polystachios var. polystachios | S2 | G5T5
? | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes coastal islands" -Hough | Forest | -- |
| Pinus taeda | S3 | G5 | "Moist sandy woods" -S&V. Also in ecotonal areas between hammocks in salt marsh. | Forest; Towns; Rural; Pres | FAC- |
| Plantago maritima var. juncoides | S2 | G5T5 | Wetlands. "Salt or brackish conditions, in water or wet soil of marshes, swamps, beaches, tidal streams, headlands" -Hough | Forest | OBL |

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|---|------|-------------|--|--|--|------|
| <i>Polygala polygama</i> | S2 | G5 | | "Dry, usually sandy, open ground of fields, woods and shaded edges" -Hough. | Forest; Pres | UPL |
| <i>Polygonum buxiforme</i> | S3 | G5 | | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of marshes and dunes" -FNA. | Forest | -- |
| <i>Potamogeton confervoides</i> | S2 | G5 | | Aquatic. "Restricted to ponds and streams in the Pine Barrens ..." -Stone. | Villages; Forest; Rural; Pres | OBL |
| <i>Potamogeton oakesianus</i> | S2 | G5 | | Aquatic. "Pine Barren ponds" -S&V. | Forest; Rural; Pres | OBL |
| <i>Proserpinaca intermedia</i> | S3 | G4?Q | | Aquatic, or saturated wetlands. "Shallow water of marshes, ditches, pond edges" -Hough. | Pres; Forest | OBL |
| <i>Prunus angustifolia</i> var. <i>angustifolia</i> | S2 | G5 | | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres; fpp | -- |
| <i>Puccinellia fasciculata</i> | S2 | G3G5 | | Wetlands. "Wet soil or water of salt marsh borders, beaches" -Hough | Forest | OBL |
| <i>Pycnanthemum setosum</i> | S3 | G4 | | "Dry or moist, open, sandy ground of thin woods, fields, salt marshes, beaches" -Hough | Villages; Forest; RegGro; Towns; Rural; Pres | FACU |
| <i>Quercus michauxii</i> | S3 | G5 | | Wetlands. "Swamp margins and stream banks" -S&V. | Forest; Rural | FACW |
| <i>Rhododendron atlanticum</i> | S2 | G4G5 | | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Rhynchospora leptocarpa</i> | S1 | G3 | | Wetlands. | SpecAg; Pres | |
| <i>Rhynchospora nitens</i> | S1 | G4? | | Wetlands. "Moist to wet sands or peats of stream banks, pond shores, depressions in savannas, marshes" -FNA. | Forest; RegGro; Pres | OBL |
| <i>Rhynchospora oligantha</i> | S2 | G4 | | Wetlands. "Pine Barren bogs" -S&V. | SpecAg; Pres; fpp | OBL |
| <i>Rhynchospora pallida</i> | S3 | G3 | | Wetlands. Open boggy areas, pitch pine lowlands, ecotonal areas, turf cuts. | Forest; MilFed; RegGro; Towns; Rural; Pres; SpecAg | OBL |
| <i>Rhynchospora scirpoides</i> | S2 | G4 | | Wetlands. "Moist to wet sands or peats of banks of streams and ditches, pond and lakeshores, depressions in savannas, marshes" -FNA. | AgPro; Forest; Pres | OBL |
| <i>Rotala ramosior</i> | S3 | G5 | | Wetlands. "Moist open soil" -S&V. | Forest; RegGro; Pres | OBL |
| <i>Rubus novocaesarius</i> | S1.1 | G1 | | ? | Villages | -- |
| <i>Sabatia campanulata</i> | S3 | G5 | | Wetlands. "Wet, low, sandy or peaty ground in salt or brackish conditions" -Hough. | Forest; RegGro; Pres | FACW |
| <i>Sabatia dodecandra</i> var. <i>dodecandra</i> | S2 | G5?T
4T5 | | Wetlands. "Saline or brackish (rarely fresh) water of tidal marshes, watersides" -Hough | Forest | OBL |

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|--|-------|--------------|--|--|---------------------------------------|-------|
| <i>Sagittaria calycina</i> var. <i>spongiosa</i> | S2 | G5T4 | | Wetlands. "Brackish to freshwater tidal mud flats and salt marshes." -FNA | Pres | OBL |
| <i>Sagittaria subulata</i> | S3 | G4 | | Wetlands. "Tidal mud of fresh to brackish waters" -S&V. | Forest; Pres | OBL |
| <i>Schoenoplectus novae-angliae</i> | S2(?) | G5 | | Wetlands. Brackish tidal zones. | RegGro; Pres | OBL |
| <i>Scleria pauciflora</i> var. <i>caroliniana</i> | S2 | G5T4
T5 | | Uplands and wetlands. "Dry to mostly wet pinelands, savannas, mesic woods, meadows, bogs, and prairies" -FNA. | RegGro; Towns; SpecAg; Pres; | FACU+ |
| <i>Senecio tomentosus</i> | S2 | G4G5 | | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, pineland edges -Hough. | Forest | FACU |
| <i>Sesuvium maritimum</i> | S2 | G5 | | Wetlands. "Sea beaches, dune hollows and salt flats" -S&V. | Forest | FACW |
| <i>Setaria magna</i> | S2 | G4G5 | | Wetlands. "Low, wet, disturbed soil in fresh to brackish conditions" -Hough. | Forest | FACW |
| <i>Sisyrinchium fuscatum</i> | S1 | G5? | | "Dry, sandy soils..." -Hough. | Pres | -- |
| <i>Smilax laurifolia</i> | S3(?) | G5 | | Wetlands. "Low, wet ground of woods, especially in cedar swamps" -Hough | Villages; Forest; SpecAg; Pres; Rural | OBL |
| <i>Solidago elliotii</i> | S3 | G5 | | Wetlands. "Well-drained ground with a constant high water table such as on hummocks in fresh or brackish water..." -Hough. | Forest | OBL |
| <i>Solidago rugosa</i> ssp. <i>rugosa</i> var. <i>sphagnophila</i> | S3 | G5T3
T5 | | Wetlands. "swampy places" --Cronquist | Rural | FAC |
| <i>Solidago tarda</i> | S3 | G4?Q | | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Solidago uliginosa</i> var. <i>uliginosa</i> | S3 | G4G5
T4T5 | | Wetlands | Forest; Towns | |
| <i>Sphagnum cyclophyllum</i> | S3 | G3 | | Wetlands | Forest; Pres; SpecAg | -- |
| <i>Sphagnum macrophyllum</i> | S2 | G3 | | Wetlands | Forest; Pres; Villages | |
| <i>Sphagnum perichaetiale</i> | S2 | G5 | | Wetlands | Pres | -- |
| <i>Sphagnum portoricense</i> | S2 | G5 | | Wetlands | Forest; Towns; Pres; SpecAg | -- |
| <i>Sphagnum tenellum</i> | S1 | G5 | | Wetlands | Pres | -- |
| <i>Spiranthes odorata</i> | S2 | G5 | | Wetlands. Open, moist to wet areas. | Forest; Towns; Rural | OBL |

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| <i>Sporobolus clandestinus</i> | S3 | G5 | | Dry, sandy to rocky ground of woods edges, meadows" -Hough. | Forest | -- |
| <i>Sporobolus compositus</i> var. <i>compositus</i> | S2 | G5T5 | | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylosanthes biflora</i> | S3 | G5 | | Dry. "Open sandy ground, edges of woods" - Stone. | Forest; RegGro; Pres; Villages; fpp | -- |
| <i>Suaeda calceoliformis</i> | S3 | G5 | | Wetlands. "Saline or alkaline soil" -G&C. Salt marshes. | Forest | -- |
| <i>Taxodium distichum</i> | S2? | G5 | | Wetlands "Brownwater riverine and lacustrine margins and swamps, occasionally in brackish water" -Cronquist | Pres | |
| <i>Toxicodendron pubescens</i> | S3 | G5 | | "Dry, sandy ground of woods" -Hough. | Villages | FACU |
| <i>Utricularia intermedia</i> | S3 | G5 | | Aquatic, or on wet shores. | Forest | OBL |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | S2 | G5T4
T5 | | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | S3 | G4G5
T4T5 | | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |
| <i>Xyris chapmanii</i> | S1 | G3 | | Wetlands. "seepage bogs in areas of copious lateral seepage in deep muck soils" --Weakley | SpecAg; Pres | |

SHEET THREE

| NAME-BRIEF | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|--|----|-------------|----|----|---|--------------------------------|----------|
| Agalinis fasciculata | S3 | G5 | | | Wetlands. "Pine Barren bogs" -Stone. | Pres; Towns; Rural; SpecAg | FAC |
| Amianthium muscitoxicum | S2 | G4G5 | | | "Open woods and roadsides in moist or dry ground" -S&V. | AgPro; Forest; Rural | FAC |
| Andropogon gyrans | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | -- |
| Arethusa bulbosa | S2 | G5 | | | Wetlands. "Mossy, open, pineland bogs; swampy grasslands" -Hough. Often with Sphagnum pulchrum and Gaylussacia dumosa. | Villages; Forest; Pres; SpecAg | OBL |
| Aristida virgata | S2 | G5T4
T5 | | | "Moist, sandy soil of low pinelands, bog edges, ditches" -Hough | Forest; Pres; Rural | FAC |
| Carex lonchocarpa | S2 | G5 | | | Wetlands. Wet savannas, forests, seeps, stream banks, lakeshores, in sandy, peaty, or acidic soils - FNA | Forest; Rural | OBL |
| Carex mitchelliana | S2 | G4 | | | Wetlands. "Swamps, floodplain forests, wet meadows, stream edges, margins of lakes and ponds, roadside ditches" -FNA | Villages; Forest; Pres | OBL |
| Carex silicea | S3 | G5 | | | "Sand or sandy soil near the coast" -G&C | Forest | -- |
| Chenopodium berlandieri var. macrocalycium | S3 | G5T4 | | | "Primarily restricted to sea beaches" -Snyder, 2000. | Forest | -- |
| Cornus foemina | S2 | G5 | | | Wetlands. "Swamps, wet woods and bottomlands" -Fernald. | RegGro | FAC |
| Cuscuta coryli | S2 | G5? | | | "Parasitic on various shrubs and herbs, including Corylus, in low, sandy, moist or dry ground of watersides, bottomlands" -Hough. | Towns; Pres | -- |
| Desmodium laevigatum | S3 | G5 | | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| Desmodium nuttallii | S2 | G5 | | | "Dry, sandy, open woods" -Fernald. | Forest | -- |
| Desmodium viridiflorum | S2 | G5? | | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| Dichantherium scabriusculum | S3 | G4 | | | Wetlands. "Wet, low ground of swamps, woods, pondsides" -Hough | Forest; Pres | OBL |
| Dichantherium wrightianum | S2 | G4 | | | Wetlands: "Pond margins and wet open areas in the Pine Barrens" -S&V. | Forest; Towns; Rural; Pres | OBL |
| Diplachne maritima | S2 | G5T3
T4Q | | | Wetlands. "Wet soil of watersides, fresh or usually brackish water of marshes" -Hough | Forest | FACW |
| Echinochloa muricata var. microstachya | S2 | G5T5 | | | "Moist, open, disturbed ground, banks, ditches" -Hough. | Forest; Pres | FACW+ |
| Elatine minima | S3 | G5 | | | Aquatic. "Sandy or muddy margins of lakes and ponds" -S&V. | MilFed; Pres | OBL |

S1 is extracted. "OBL" is highlighted.

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| <i>Eleocharis quadrangulata</i> | S4(?) | G5 | | Wetlands. "Shallow water of ponds and streams" - S&V. | Forest; Rural; Pres | OBL |
| <i>Erechtites hieraciifolia</i> var. <i>megalocarpa</i> | S2 | G5T3 | | Wetlands. "Saline coastal marshes from Mass. to NJ" -G&C. | Forest | FACU |
| <i>Eriocaulon parkeri</i> | S2 | G3 | | Aquatic. "In shallow water of estuaries and muddy tidal flats" S&V | Villages; Forest; RegGro; Rural; SpecAg; Pres | OBL |
| <i>Eryngium aquaticum</i> var. <i>aquaticum</i> | S3 | G4T4 | | Wetlands "Salt to brackish water and wet ground of marshes, tidewaters, ponds, bogs" -Hough | Forest; RegGro; Towns; Rural; SpecAg; Pres | OBL |
| <i>Eupatorium coelestinum</i> | S4(?) | G5 | | Wetlands "Borders of salt marshes and moist woods" -S&V | Forest; Towns; Pres | FAC |
| <i>Fimbristylis caroliniana</i> | S2 | G4 | | "Dry to moist, open, sandy soil of pinelands, dune hollows; in brackish or saline conditions" -Hough | Forest | FACW+ |
| <i>Fimbristylis castanea</i> | S2 | G5 | | Wetlands "Salt to brackish water of marshes" - Hough | Forest; Pres | OBL |
| <i>Fuirena squarrosa</i> | S3 | G4G5 | | Wetlands. "Wet, sandy soil; salt marsh edges" - Hough | Forest | OBL |
| <i>Gentiana saponaria</i> var. <i>saponaria</i> | S3 | G5 | | Wetlands. "Wet, sandy, open ground of bogs, watersides, wooded slopes and edges" -Hough | Forest; SpecAg; Pres | FACW |
| <i>Gratiola pilosa</i> | S2 | G5? | | Dry to moist salt marsh edges, open woods, edges -Hough | Forest | FACU |
| <i>Hydrocotyle verticillata</i> var. <i>verticillata</i> | S2 | G5T5 | | Wetlands. "Marshes and pond shores" -S&V. | Forest; Towns; Pres | OBL |
| <i>Juncus greenei</i> | S2 | G5 | | "Dry or moist sandy soil" -S&V | MilFed | FAC |
| <i>Lactuca graminifolia</i> var. <i>graminifolia</i> | SU | G5?T3T5 | | "Sandy woods and clearings" -Fernald. | Pres | -- |
| <i>Lactuca hirsuta</i> var. <i>sanguinea</i> | S2 | G5?T5? | | "Dry open woods & clearings" -Fernald. | Pres | -- |
| <i>Lespedeza stuevei</i> | S2 | G4? | | Dry. "Sandy ground along the edges of woods and thickets" -Stone. | RegGro | -- |
| <i>Lupinus perennis</i> var. <i>perennis</i> | S3 | G5T5? | | "Dry, open woods, clearings and openings" - Fernald | SEED; Forest; RegGro | -- |
| <i>Lycopodiella caroliniana</i> | S4(?) | G5T4 | | Wetlands. "Moist sandy or peaty bogs and damp sandy acid depressions..." -M&F. | Pres | FACW+ |
| <i>Lythrum lineare</i> | S3 | G5 | | Wetlands. "Brackish marshes on the coastal plain." --Cronquist | Forest; RegGro; Pres | |

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|--|----|-------------|--|---|------|
| <i>Malus angustifolia</i> var. <i>puberula</i> | S2 | G5?T
2T4 | "Low, open ground of shaded woods edges, old fields, fencerows, bottomlands" -Hough. | NHP; Forest | -- |
| <i>Oenothera oakesiana</i> | S3 | G4G5
Q | Dry. "Fields, roadsides, prairies, and waste places" -G&C. | Forest | -- |
| <i>Ophioglossum pusillum</i> | S3 | G5 | Wetlands. "Wet meadows, edges of swamps, and moist open woods" -M&F. | Pres | OBL |
| <i>Osmunda cinnamomea</i> var. <i>glandulosa</i> | S2 | G5TN
R | Wetlands. Presumably, the same as var. <i>cinnamomea</i> , "Wet woods, swamps, open marshes, bogs, and roadside ditches" -M&F. | AgPro; Forest; Rural; | FACW |
| <i>Paspalum dissectum</i> | S2 | G4? | Wetlands. "Shallow water, pond margins and other wet places" -S&V. | MilFed; Towns; Rural; AgPro | OBL |
| <i>Paspalum floridanum</i> | S3 | G5 | "Sandy, usually moist, open ground; brackish marshes" -Hough. | Villages; Forest; RegGro | FACW |
| <i>Phaseolus polystachios</i> var. <i>polystachios</i> | S2 | G5T5
? | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes coastal islands" -Hough | Forest | -- |
| <i>Pinus taeda</i> | S3 | G5 | "Moist sandy woods" -S&V. Also in ecotonal areas between hammocks in salt marsh. | Forest; Towns; Rural; Pres | FAC- |
| <i>Plantago maritima</i> var. <i>juncoides</i> | S2 | G5T5 | Wetlands. "Salt or brackish conditions, in water or wet soil of marshes, swamps, beaches, tidal streams, headlands" -Hough | Forest | OBL |
| <i>Polygala polygama</i> | S2 | G5 | "Dry, usually sandy, open ground of fields, woods and shaded edges" -Hough. | Forest; Pres | UPL |
| <i>Polygonum buxiforme</i> | S3 | G5 | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of marshes and dunes" -FNA. | Forest | -- |
| <i>Potamogeton confervoides</i> | S2 | G5 | Aquatic. "Restricted to ponds and streams in the Pine Barrens ..." -Stone. | Villages; Forest; Rural; Pres | OBL |
| <i>Potamogeton oakesianus</i> | S2 | G5 | Aquatic. "Pine Barren ponds" -S&V. | Forest; Rural; Pres | OBL |
| <i>Proserpinaca intermedia</i> | S3 | G4?Q | Aquatic, or saturated wetlands. "Shallow water of marshes, ditches, pond edges" -Hough. | Pres; Forest | OBL |
| <i>Prunus angustifolia</i> var. <i>angustifolia</i> | S2 | G5 | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres | -- |
| <i>Puccinellia fasciculata</i> | S2 | G3G5 | Wetlands. "Wet soil or water of salt marsh borders, beaches" -Hough | Forest | OBL |
| <i>Pycnanthemum setosum</i> | S3 | G4 | "Dry or moist, open, sandy ground of thin woods, fields, salt marshes, beaches" -Hough | Villages; Forest; RegGro;
Towns; Rural; Pres | FACU |

| | | | | | | |
|--|-------|---------|--|--|--|-------|
| <i>Quercus michauxii</i> | S3 | G5 | | Wetlands. "Swamp margins and stream banks" - S&V. | Forest; Rural | FACW |
| <i>Rhododendron atlanticum</i> | S2 | G4G5 | | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Rhynchospora oligantha</i> | S2 | G4 | | Wetlands. "Pine Barren bogs" -S&V. | SpecAg; Pres; fpp | OBL |
| <i>Rhynchospora pallida</i> | S3 | G3 | | Wetlands. Open boggy areas, pitch pine lowlands, ecotonal areas, turf cuts. | Forest; MilFed; RegGro; Towns; Rural; Pres; SpecAg | OBL |
| <i>Rhynchospora scirpoides</i> | S2 | G4 | | Wetlands. "Moist to wet sands or peats of banks of streams and ditches, pond and lakeshores, depressions in savannas, marshes" -FNA. | AgPro; Forest; Pres | OBL |
| <i>Rotala ramosior</i> | S3 | G5 | | Wetlands. "Moist open soil" -S&V. | Forest; RegGro; Pres | OBL |
| <i>Sabatia campanulata</i> | S3 | G5 | | Wetlands. "Wet, low, sandy or peaty ground in salt or brackish conditions" -Hough. | Forest; RegGro; Pres | FACW |
| <i>Sabatia dodecandra</i> var. <i>dodecandra</i> | S2 | G5?T4T5 | | Wetlands. "Saline or brackish (rarely fresh) water of tidal marshes, watersides" -Hough | Forest | OBL |
| <i>Sagittaria calycina</i> var. <i>spongiosa</i> | S2 | G5T4 | | Wetlands. "Brackish to freshwater tidal mud flats and salt marshes." -FNA | Pres | OBL |
| <i>Sagittaria subulata</i> | S3 | G4 | | Wetlands. "Tidal mud of fresh to brackish waters" - S&V. | Forest; Pres | OBL |
| <i>Schoenoplectus novae-angliae</i> | S2(?) | G5 | | Wetlands. Brackish tidal zones. | RegGro; Pres | OBL |
| <i>Scleria pauciflora</i> var. <i>caroliniana</i> | S2 | G5T4T5 | | Uplands and wetlands. "Dry to mostly wet pinelands, savannas, mesic woods, meadows, bogs, and prairies" -FNA. | RegGro; Towns; SpecAg; Pres; | FACU+ |
| <i>Senecio tomentosus</i> | S2 | G4G5 | | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, pineland edges -Hough. | Forest | FACU |
| <i>Sesuvium maritimum</i> | S2 | G5 | | Wetlands. "Sea beaches, dune hollows and salt flats" -S&V. | Forest | FACW |
| <i>Setaria magna</i> | S2 | G4G5 | | Wetlands. "Low, wet, disturbed soil in fresh to brackish conditions" -Hough. | Forest | FACW |
| <i>Smilax laurifolia</i> | S3(?) | G5 | | Wetlands. "Low, wet ground of woods, especially in cedar swamps" -Hough | Villages; Forest; SpecAg; Pres; Rural | OBL |
| <i>Solidago elliotii</i> | S3 | G5 | | Wetlands. "Well-drained ground with a constant high water table such as on hummocks in fresh or brackish water..." -Hough. | Forest | OBL |
| <i>Solidago rugosa</i> ssp. <i>rugosa</i> var. <i>sphagnophila</i> | S3 | G5T3T5 | | Wetlands. "swampy places" --Cronquist | Rural | FAC |

| | | | | | | |
|---|-----|--------------|--|---|--------------------------------|------|
| <i>Solidago tarda</i> | S3 | G4?Q | | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Solidago uliginosa</i> var. <i>uliginosa</i> | S3 | G4G5
T4T5 | | Wetlands | Forest; Towns | |
| <i>Sphagnum cyclophyllum</i> | S3 | G3 | | Wetlands | Forest; Pres; SpecAg | -- |
| <i>Sphagnum macrophyllum</i> | S2 | G3 | | Wetlands | Forest; Pres; Villages | |
| <i>Sphagnum perichaetiale</i> | S2 | G5 | | Wetlands | Pres | -- |
| <i>Sphagnum portoricense</i> | S2 | G5 | | Wetlands | Forest; Towns; Pres; SpecAg | -- |
| <i>Spiranthes odorata</i> | S2 | G5 | | Wetlands. Open, moist to wet areas. | Forest; Towns; Rural | OBL |
| <i>Sporobolus clandestinus</i> | S3 | G5 | | Dry, sandy to rocky ground of woods edges, meadows" -Hough. | Forest | -- |
| <i>Sporobolus compositus</i> var. <i>compositus</i> | S2 | G5T5 | | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylosanthes biflora</i> | S3 | G5 | | Dry. "Open sandy ground, edges of woods" - Stone. | Forest; RegGro; Pres; Villages | -- |
| <i>Suaeda calceoliformis</i> | S3 | G5 | | Wetlands. "Saline or alkaline soil" -G&C. Salt marshes. | Forest | -- |
| <i>Taxodium distichum</i> | S2? | G5 | | Wetlands "Brownwater riverine and lacustrine margins and swamps, occasionally in brackish water" -Cronquist | Pres | OBL |
| <i>Toxicodendron pubescens</i> | S3 | G5 | | "Dry, sandy ground of woods" -Hough. | Villages | FACU |
| <i>Utricularia intermedia</i> | S3 | G5 | | Aquatic, or on wet shores. | Forest | OBL |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | S2 | G5T4
T5 | | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | S3 | G4G5
T4T5 | | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |

SHEET FOUR

| NAME-BRIEF | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|--|-------|-------------|----|----|--|----------------------|----------|
| Agalinis fasciculata | S3 | G5 | | | Wetlands. "Pine Barren bogs" - | Pres; Towns; | FAC |
| Amianthium muscitoxicum | S2 | G4G5 | | | "Open woods and roadsides in moist or dry ground" -S&V. | AgPro; Forest; Rural | FAC |
| Andropogon gyrans | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | -- |
| Aristida virgata | S2 | G5T4
T5 | | | "Moist, sandy soil of low pinelands, bog edges, ditches" - | Forest; Pres; Rural | FAC |
| Carex silicea | S3 | G5 | | | "Sand or sandy soil near the | Forest | -- |
| Chenopodium berlandieri var. macrocalycium | S3 | G5T4 | | | "Primarily restricted to sea beaches" -Snyder, 2000. | Forest | FACU |
| Cornus foemina | S2 | G5 | | | Wetlands. "Swamps, wet woods and bottomlands" -Fernald. | RegGro | FAC |
| Cuscuta coryli | S2 | G5? | | | "Parasitic on various shrubs and herbs, including Corylus, in low, sandy, moist or dry ground of | Towns; Pres | -- |
| Desmodium laevigatum | S3 | G5 | | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| Desmodium nuttallii | S2 | G5 | | | "Dry, sandy, open woods" - | Forest | -- |
| Desmodium viridiflorum | S2 | G5? | | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| Diplachne maritima | S2 | G5T3
T4Q | | | Wetlands. "Wet soil of watersides, fresh or usually | Forest | FACW |
| Echinochloa muricata var. microstachya | S2 | G5T5 | | | "Moist, open, disturbed ground, banks, ditches" -Hough. | Forest; Pres | FACW+ |
| Erechtites hieraciifolia var. megalocarpa | S2 | G5T3 | | | Wetlands. "Saline coastal marshes from Mass. to NJ" - | Forest | FACU |
| Eupatorium coelestinum | S4(?) | G5 | | | Wetlands "Borders of salt marshes and moist woods" - | Forest; Towns; Pres | FAC |
| Fimbristylis caroliniana | S2 | G4 | | | "Dry to moist, open, sandy soil of pinelands, dune hollows; in brackish or saline conditions" - | Forest | FACW+ |
| Gentiana saponaria var. saponaria | S3 | G5 | | | Wetlands. "Wet, sandy, open ground of bogs, watersides, | Forest; SpecAg; Pres | FACW |
| Gratiola pilosa | S2 | G5? | | | Dry to moist salt marsh edges, open woods, edges -Hough | Forest | FACU |
| Juncus greenei | S2 | G5 | | | "Dry or moist sandy soil" -S&V | MilFed | FAC |

"OBL" is extracted. "FACW" is highlighted.

| | | | | | | |
|--|-------|-------------|--|--|----------------------------------|-------|
| Lactuca graminifolia var. graminifolia | SU | G5?T
3T5 | | "Sandy woods and clearings" - Fernald. | Pres | -- |
| Lactuca hirsuta var. sanguinea | S2 | G5?T
5? | | "Dry open woods & clearings" - Fernald. | Pres | -- |
| Lespedeza stuevei | S2 | G4? | | Dry. "Sandy ground along the edges of woods and thickets" - | RegGro | -- |
| Lupinus perennis var. perennis | S3 | G5T5
? | | "Dry, open woods, clearings and openings" -Fernald | Forest; RegGro | -- |
| Lycopodiella caroliniana | S4(?) | G5T4 | | Wetlands. "Moist sandy or peaty bogs and damp sandy acid | Pres | FACW+ |
| Lythrum lineare | S3 | G5 | | Wetlands. "Brackish marshes on the coastal plain." -- | Forest; RegGro; Pres | |
| Malus angustifolia var. puberula | S2 | G5?T
2T4 | | "Low, open ground of shaded woods edges, old fields, | NHP; Forest | -- |
| Oenothera oakesiana | S3 | G4G5
Q | | Dry. "Fields, roadsides, prairies, and waste places" -G&C. | Forest | -- |
| Osmunda cinnamomea var. glandulosa | S2 | G5TN
R | | Wetlands. Presumably, the same as var. cinnamomea, "Wet woods, swamps, open | AgPro; Forest; Rural; | FACW |
| Paspalum floridanum | S3 | G5 | | "Sandy, usually moist, open ground; brackish marshes" - | Villages; Forest; RegGro | FACW |
| Phaseolus polystachios var. polystachios | S2 | G5T5
? | | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes | Forest | -- |
| Pinus taeda | S3 | G5 | | "Moist sandy woods" -S&V. Also in ecotonal areas between | Forest; Towns; Rural; Pres | FAC- |
| Polygala polygama | S2 | G5 | | "Dry, usually sandy, open ground of fields, woods and | Forest; Pres | UPL |
| Polygonum buxiforme | S3 | G5 | | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of | Forest | -- |
| Prunus angustifolia var. angustifolia | S2 | G5 | | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres | -- |
| Pycnanthemum setosum | S3 | G4 | | "Dry or moist, open, sandy ground of thin woods, fields, salt | Villages; Forest; RegGro; Towns; | FACU |

| | | | | | | |
|--|----|--------------|--|---|--------------------------------|-------|
| <i>Quercus michauxii</i> | S3 | G5 | | Wetlands. "Swamp margins and stream banks" -S&V. | Forest; Rural | FACW |
| <i>Rhododendron atlanticum</i> | S2 | G4G5 | | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Sabatia campanulata</i> | S3 | G5 | | Wetlands. "Wet, low, sandy or peaty ground in salt or brackish | Forest; RegGro; Pres | FACW |
| <i>Scleria pauciflora</i> var. <i>caroliniana</i> | S2 | G5T4
T5 | | Uplands and wetlands. "Dry to mostly wet pinelands, savannas, mesic woods, meadows, bogs, | RegGro; Towns; SpecAg; Pres; | FACU+ |
| <i>Senecio tomentosus</i> | S2 | G4G5 | | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, | Forest | FACU |
| <i>Sesuvium maritimum</i> | S2 | G5 | | Wetlands. "Sea beaches, dune hollows and salt flats" -S&V. | Forest | FACW |
| <i>Setaria magna</i> | S2 | G4G5 | | Wetlands. "Low, wet, disturbed soil in fresh to brackish | Forest | FACW |
| <i>Solidago rugosa</i> ssp. <i>rugosa</i> var. <i>sphagnophila</i> | S3 | G5T3
T5 | | Wetlands. "swampy places" -- Cronquist | Rural | FAC |
| <i>Solidago tarda</i> | S3 | G4?Q | | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Sporobolus clandestinus</i> | S3 | G5 | | Dry, sandy to rocky ground of woods edges, meadows" - | Forest | -- |
| <i>Sporobolus compositus</i> var. <i>compositus</i> | S2 | G5T5 | | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylosanthes biflora</i> | S3 | G5 | | Dry. "Open sandy ground, edges of woods" -Stone. | Forest; RegGro; Pres; Villages | -- |
| <i>Suaeda calceoliformis</i> | S3 | G5 | | Wetlands. "Saline or alkaline soil" -G&C. Salt marshes. | Forest | FACW |
| <i>Toxicodendron pubescens</i> | S3 | G5 | | "Dry, sandy ground of woods" - | Villages | FACU |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | S2 | G5T4
T5 | | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | S3 | G4G5
T4T5 | | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |

SHEET FIVE

| NAME-BRIEF | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|--|-----------|-------------|----|----|---|----------------------------|----------|
| Agalinis fasciculata | S3 | G5 | | | Wetlands. "Pine Barren bogs" -Stone. | Pres; Towns; Rural; SpecAg | FAC |
| Amianthium muscitoxicum | S2 | G4G5 | | | "Open woods and roadsides in moist or dry ground" -S&V. | AgPro; Forest; Rural | FAC |
| Andropogon gyrans | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | -- |
| Aristida virgata | S2 | G5T4
T5 | | | "Moist, sandy soil of low pinelands, bog edges, ditches" -
Hough | Forest; Pres; Rural | FAC |
| Carex silicea | S3 | G5 | | | "Sand or sandy soil near the coast" -G&C | Forest | -- |
| Cornus foemina | S2 | G5 | | | Wetlands. "Swamps, wet woods and bottomlands" -
Fernald. | RegGro | FAC |
| Cuscuta coryli | S2 | G5? | | | "Parasitic on various shrubs and herbs, including Corylus,
in low, sandy, moist or dry ground of watersides,
bottomlands" -Hough. | Towns; Pres | -- |
| Desmodium laevigatum | S3 | G5 | | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| Desmodium nuttallii | S2 | G5 | | | "Dry, sandy, open woods" -Fernald. | Forest | -- |
| Desmodium viridiflorum | S2 | G5? | | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| Erechtites hieraciifolia var.
megalocarpa | S2 | G5T3 | | | Wetlands. "Saline coastal marshes from Mass. to NJ" -
G&C. | Forest | FAC |
| Eupatorium coelestinum | S4(
?) | G5 | | | Wetlands "Borders of salt marshes and moist woods" -
S&V | Forest; Towns; Pres | FAC |
| Gratiola pilosa | S2 | G5? | | | Dry to moist salt marsh edges, open woods, edges -Hough | Forest | FACU |
| Juncus greenei | S2 | G5 | | | "Dry or moist sandy soil" -S&V | MilFed | FAC |
| Lactuca graminifolia var.
graminifolia | SU | G5?T
3T5 | | | "Sandy woods and clearings" -Fernald. | Pres | -- |
| Lactuca hirsuta var. sanguinea | S2 | G5?T
5? | | | "Dry open woods & clearings" -Fernald. | Pres | -- |
| Lespedeza stuevei | S2 | G4? | | | Dry. "Sandy ground along the edges of woods and
thickets" -Stone. | RegGro | -- |
| Lupinus perennis var.
perennis | S3 | G5T5
? | | | "Dry, open woods, clearings and openings" -Fernald | Forest; RegGro | -- |
| Malus angustifolia var.
puberula | S2 | G5?T
2T4 | | | "Low, open ground of shaded woods edges, old fields,
fencerows, bottomlands" -Hough. | NHP; Forest | -- |
| Oenothera oakesiana | S3 | G4G5
Q | | | Dry. "Fields, roadsides, prairies, and waste places" -G&C. | Forest | -- |

"FACW" is extracted. "FAC" with strong wetland affinity highlighted

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|--|----|--------------|--|--|------|
| <i>Phaseolus polystachios</i> var. <i>polystachios</i> | S2 | G5T5
? | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes coastal islands" -Hough | Forest | -- |
| <i>Pinus taeda</i> | S3 | G5 | "Moist sandy woods" -S&V. Also in ecotonal areas between hammocks in salt marsh. | Forest; Towns; Rural; Pres | FAC |
| <i>Polygala polygama</i> | S2 | G5 | "Dry, usually sandy, open ground of fields, woods and shaded edges" -Hough. | Forest; Pres | UPL |
| <i>Polygonum buxiforme</i> | S3 | G5 | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of marshes and dunes" -FNA. | Forest | -- |
| <i>Prunus angustifolia</i> var. <i>angustifolia</i> | S2 | G5 | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres | -- |
| <i>Pycnanthemum setosum</i> | S3 | G4 | "Dry or moist, open, sandy ground of thin woods, fields, salt marshes, beaches" -Hough | Villages; Forest; RegGro; Towns; Rural; Pres | FACU |
| <i>Rhododendron atlanticum</i> | S2 | G4G5 | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Senecio tomentosus</i> | S2 | G4G5 | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, pineland edges" -Hough. | Forest | FACU |
| <i>Solidago rugosa</i> ssp. <i>rugosa</i> var. <i>sphagnophila</i> | S3 | G5T3
T5 | Wetlands. "swampy places" --Cronquist | Rural | FAC |
| <i>Solidago tarda</i> | S3 | G4?Q | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Sporobolus clandestinus</i> | S3 | G5 | Dry, sandy to rocky ground of woods edges, meadows" -Hough. | Forest | -- |
| <i>Sporobolus compositus</i> var. <i>compositus</i> | S2 | G5T5 | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylosanthes biflora</i> | S3 | G5 | Dry. "Open sandy ground, edges of woods" -Stone. | Forest; RegGro; Pres; Villages | -- |
| <i>Toxicodendron pubescens</i> | S3 | G5 | "Dry, sandy ground of woods" -Hough. | Villages | FACU |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | S2 | G5T4
T5 | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | S3 | G4G5
T4T5 | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |

SHEET SIX

| NAME-BRIEF | SR | GR | SS | FS | Habitat | Management Area | wet stat |
|--|--------|---------------|----|----|---|----------------------------|----------|
| Amianthium musciticum | S2 | G4
G5 | | | "Open woods and roadsides in moist or dry ground" - S&V. | AgPro; Forest; Rural | FAC |
| Andropogon gyrans | S2 | G5 | | | "Dry, open, sterile soil" -Hough. | SpecAg | FACU |
| Carex silicea | S3 | G5 | | | "Sand or sandy soil near the coast" -G&C | Forest | -- |
| Cuscuta coryli | S2 | G5
? | | | "Parasitic on various shrubs and herbs, including Corylus, in low, sandy, moist or dry ground of watersides, bottomlands" -Hough. | Towns; Pres | -- |
| Desmodium laevigatum | S3 | G5 | | | "Dry sandy woods" -Stone. | Forest; Rural | -- |
| Desmodium nuttallii | S2 | G5 | | | "Dry, sandy, open woods" -Fernald. | Forest | -- |
| Desmodium viridiflorum | S2 | G5
? | | | "Dry sandy thickets and edges of woods" -Stone. | Forest | -- |
| Gratiola pilosa | S2 | G5
? | | | Dry to moist salt marsh edges, open woods, edges - Hough | Forest | FACU |
| Juncus greenei | S2 | G5 | | | "Dry or moist sandy soil" -S&V | MilFed | FAC |
| Lactuca graminifolia var. graminifolia | S
U | G5
?T | | | "Sandy woods and clearings" -Fernald. | Pres | -- |
| Lactuca hirsuta var. sanguinea | S2 | G5
?T | | | "Dry open woods & clearings" -Fernald. | Pres | -- |
| Lespedeza stuevei | S2 | G4
? | | | Dry. "Sandy ground along the edges of woods and thickets" -Stone. | RegGro | -- |
| Lupinus perennis var. perennis | S3 | G5
T5 | | | "Dry, open woods, clearings and openings" -Fernald | Forest; RegGro | -- |
| Malus angustifolia var. puberula | S2 | G5
?T | | | "Low, open ground of shaded woods edges, old fields, fencerows, bottomlands" -Hough. | Forest | -- |
| Oenothera oakesiana | S3 | G4
G5 | | | Dry. "Fields, roadsides, prairies, and waste places" - G&C. | Forest | -- |
| Phaseolus polystachios var. polystachios | S2 | G5
T5
? | | | "Dry to moist, often sandy ground; often in shaded pine or oak woods edges; includes coastal islands" - Hough | Forest | -- |
| Pinus taeda | S3 | G5 | | | "Moist sandy woods" -S&V. Also in ecotonal areas between hammocks in salt marsh. | Forest; Towns; Rural; Pres | FAC |
| Polygala polygama | S2 | G5 | | | "Dry, usually sandy, open ground of fields, woods and shaded edges" -Hough. | Forest; Pres | UPL |

Final list of 30.

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|---|----|----------------------|--|--|------|
| <i>Polygonum buxiforme</i> | S3 | G5 | "Roadsides, vacant lots, sidewalks, packed and nondrifting sands, borders of marshes and dunes" - FNA. | Forest | -- |
| <i>Prunus angustifolia</i> var. <i>angustifolia</i> | S2 | G5 | "Dry, open, sandy or sterile ground..." -Hough | RegGro; Rural; Pres | -- |
| <i>Pycnanthemum setosum</i> | S3 | G4 | "Dry or moist, open, sandy ground of thin woods, fields, salt marshes, beaches" -Hough | Villages; Forest; RegGro; Towns; Rural; Pres | FACU |
| <i>Rhododendron atlanticum</i> | S2 | G4
G5 | Dry or wet. "Sandy or loamy woods" -S&V. | Forest; RegGro; Rural | FAC |
| <i>Senecio tomentosus</i> | S2 | G4
G5 | Uplands and wetlands. "Low, open, sandy, wet or dry ground of marsh edges, swamps, pineland edges - Hough. | Forest | FACU |
| <i>Solidago tarda</i> | S3 | G4
?Q | Dry. "Sandy woods and clearings" S&V. | Forest | -- |
| <i>Sporobolus clandestinus</i> | S3 | G5 | Dry, sandy to rocky ground of woods edges, meadows" -Hough. | Forest | -- |
| <i>Sporobolus compositus</i> var. <i>compositus</i> | S2 | G5
T5 | "Dry or sandy soil" -G&C | Pres | |
| <i>Stylosanthes biflora</i> | S3 | G5 | Dry. "Open sandy ground, edges of woods" -Stone. | Forest; RegGro; Pres; Villages | -- |
| <i>Toxicodendron pubescens</i> | S3 | G5 | "Dry, sandy ground of woods" -Hough. | Villages | FACU |
| <i>Viburnum dentatum</i> var. <i>venosum</i> | S2 | G5
T4 | "Sandy soil on the coastal plain" -G&C | Villages | FAC |
| <i>Viola brittoniana</i> var. <i>brittoniana</i> | S3 | G4
G5
T4
T5 | Dry to damp. "Low, wet or moist, sandy or peaty ground, often in brackish conditions" -Hough. | Forest; Rural; Pres; Villages | FAC |



RESOLUTION OF THE NEW JERSEY PINELANDS COMMISSION

NO. PC4-26-_____

TITLE: Issuing an Order to Certify the First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

Commissioner _____ moves and Commissioner _____
seconds the motion that:

WHEREAS, on June 16, 1995, the Pinelands Commission adopted amendments to the Pinelands Comprehensive Management Plan, effective August 21, 1995, to allow local communications facilities to exceed the 35-foot height limitation set forth at N.J.A.C. 7:50-5.4, provided that a comprehensive local communications facilities plan for the entire Pinelands Area is submitted to and approved by the Pinelands Commission; and

WHEREAS, on September 11, 1998, the Pinelands Commission approved a comprehensive local communications facilities plan submitted jointly by Bell Atlantic Mobile, Comcast/Cellular One, and Nextel Communications; and

WHEREAS, on January 14, 2000, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted jointly by Sprint Spectrum, L.P. and Omnipoint PCS Entrepreneurs, Inc.; and

WHEREAS, on December 12, 2003, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by AT&T Wireless PCS of Philadelphia, LLC; and

WHEREAS, on November 10, 2011, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by T-Mobile Northeast LLC d/b/a T-Mobile; and

WHEREAS, on May 11, 2012, the Pinelands Commission approved the Public Safety Tower Plan submitted by the New Jersey Office of Information Technology in coordination with state and county agencies providing emergency wireless communications services in the Pinelands Area; and

WHEREAS, on November 8, 2013, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by Sprint Spectrum L.P.; and

WHEREAS, on November 26, 2025, New Cingular Wireless PCS, LLC d/b/a AT&T submitted the First Amendment to the 2003 AT&T Plan, which the Executive Director deemed complete on December 1, 2025; and

WHEREAS, a public hearing to receive testimony concerning the First Amendment to the 2003 AT&T Plan was duly advertised, noticed and remotely conducted on January 14, 2026, at 9:30 a.m., with a live broadcast on the Pinelands Commission's public YouTube channel and an opportunity for the public to call in during the broadcast; and

WHEREAS, the Executive Director has found that the First Amendment to the 2003 AT&T Plan is consistent with the standards and provisions of the Pinelands Comprehensive Management Plan; and

WHEREAS, the Executive Director has submitted a report to the Commission recommending issuance of an order to approve the First Amendment to the 2003 AT&T Plan; and

WHEREAS, the Commission's CMP Policy and Implementation Committee has reviewed the Executive Director's report and has recommended that the First Amendment to the 2003 AT&T Plan be approved; and

WHEREAS, the Pinelands Commission has duly considered all public testimony submitted to the Commission concerning the First Amendment to the 2003 AT&T Plan and has reviewed the Executive Director's report; and

WHEREAS, the Commission expressly recognizes that approval of this amendment modifies the existing comprehensive planning framework for the siting of local communications facilities, but does not approve any specific application for development of any local communications facility; and

WHEREAS, the Pinelands Commission accepts the recommendation of the Executive Director; and

WHEREAS, pursuant to N.J.S.A. 13:18A-5h, no action authorized by the Commission shall have force or effect until ten (10) days, Saturdays, Sundays and public holidays excepted, after a copy of the minutes of the meeting of the Commission has been delivered to the Governor for review, unless prior to expiration of the review period the Governor shall approve same, in which case the action shall become effective upon such approval.

NOW, THEREFORE BE IT RESOLVED that

1. An order is hereby issued to approve the First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T.
2. The Pinelands Commission expressly affirms that review of any applications for development of the local communications facility authorized by the amendment shall be conducted in accordance with the Executive Director’s Report, dated February 18, 2026, including its appendices, in order to ensure consistency with the requirements of the Pinelands Comprehensive Management Plan.

Record of Commission Votes

| AYE | | | | NAY | | | | NP | | | | A/R* | | | |
|------------|-----|----|------|-----|-----|----|------|-----------|-----|----|------|------|-----|----|-----------------|
| AYE | NAY | NP | A/R* | AYE | NAY | NP | A/R* | AYE | NAY | NP | A/R* | AYE | NAY | NP | A/R* |
| Asselta | | | | | | | | Lohbauer | | | | | | | Rittler Sanchez |
| Avery | | | | | | | | Matro | | | | | | | Signor |
| Buzby-Cope | | | | | | | | Mauriello | | | | | | | Wallner |
| Irick | | | | | | | | Meade | | | | | | | Matos |
| Lettman | | | | | | | | Pikolycky | | | | | | | |

*A = Abstained / R = Recused

Adopted at a meeting of the Pinelands Commission

Date: _____

Susan R. Grogan
Executive Director

Laura E. Matos
Chair



State of New Jersey
THE PINELANDS COMMISSION
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MIKIE SHERRILL
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DR. DALE G. CALDWELL
Lt. Governor

General Information: Info@pinelands.nj.gov
Application Specific Information: AppInfo@pinelands.nj.gov

LAURA E. MATOS
Chair
SUSAN R. GROGAN
Executive Director

Report on the First Amendment to the 2003 AT&T Plan, Submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

February 18, 2026

Warren O. Stilwell, Esq., on behalf of
New Cingular Wireless PCS, LLC d/b/a AT&T
Cooper Levenson
1125 Atlantic Avenue
Atlantic City, NJ 08401

Findings of Fact

I. Background

In 1995, the Pinelands Commission amended the Pinelands Comprehensive Management Plan (CMP) to address the growing need for wireless communication services within the Pinelands Area. The amendment established a framework for permitting local communications facilities (i.e., wireless communication towers or cell towers) exceeding thirty-five feet in height in management areas outside Regional Growth Areas and Pinelands Towns.

Under this framework, wireless service providers must submit a comprehensive Local Communications Facilities Plan (LCF Plan) identifying all existing facilities within the Pinelands and the approximate vicinity of proposed facilities. The CMP establishes standards governing the Commission's certification of an LCF Plan. Once certified, development of any individual facility included in the plan requires submission of a development application to the Commission. At that time, the applicant must demonstrate that the proposed development satisfies the CMP's minimum environmental standards, complies with the siting standards at N.J.A.C. 7:50-5.4(c), and, when located outside a Regional Growth Area or Pinelands Town, is consistent with a site identified in a certified LCF Plan. To date, six LCF Plans have been certified, as summarized in Table 1 below.

The First Amendment to the 2003 AT&T Plan originated from a 2020 development application (App # 1981-0162.002) for a 120-foot local communications tower proposed as an accessory use to the Woodland Volunteer Fire & EMS Station in the Pinelands Village of Chatsworth, Woodland Township. The tower was intended to provide FirstNet emergency communications service to the station. A Certificate of Filing was issued on July 27, 2020, and municipal approvals were first granted on September 15, 2020.

Table 1. Summary of Approved LCF Plans

| LCF Plan | Certification Date | Participants | Search Area Extent
(in miles) |
|-------------------------------------|---------------------------|--|--|
| Cellular Plan | 9/11/1998 | Bell Atlantic Mobile,
Comcast, Nextel | 5 |
| PCS Plan | 1/14/2000 | Sprint, Omnipoint | 0.5 |
| AT&T Plan | 12/12/2003 | AT&T | 0.5 |
| T-Mobile Plan | 11/10/2011 | T-Mobile | 1 |
| Public Safety
Tower Plan | 5/11/2012 | Pinelands Area
Counties | 3* |
| Sprint Plan | 11/8/2013 | Sprint | 1 |

*The search area extent for the Public Safety Tower Plan was amended from 1 mile to 3 miles on July 14, 2017.

During Commission review, a substantial issue arose as to whether the proposed facility qualified as an “accessory structure or use” under the CMP. Since the FirstNet public safety network also transmits commercial wireless service in addition to its priority use for first responders, the proposed tower did not meet the CMP definition of an accessory use. Additionally, no previously certified LCF Plan identified a facility within the Village of Chatsworth. Accordingly, AT&T elected to pursue an amendment to the 2003 AT&T Plan to propose a site within the Village of Chatsworth.

Beginning in 2023, AT&T engaged in discussions with Commission staff regarding an LCF Plan amendment. On June 29, 2023, staff provided preliminary comments on two potential sites and outlined the demonstrations required by the CMP for inclusion in any amendment. On June 18, 2024, AT&T submitted a draft amendment proposing one site in the Village of Chatsworth. On October 29, 2024, Commission staff responded that additional analyses were necessary to demonstrate compliance with CMP standards. A revised draft was submitted on October 3, 2025, and additional staff comments were provided on October 28, 2025. A final draft was submitted on November 26, 2025 (see Exhibit A), and deemed complete on December 1, 2025.

II. Comprehensive Local Communications Facilities (LCF) Plan Amendment

The following document has been submitted to the Pinelands Commission for certification:

- The First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

A. Summary of the First Amendment to the 2003 AT&T Plan

The proposed amendment to AT&T’s previously certified LCF Plan seeks approval to modify the company’s wireless network configuration within the Pinelands Area by replacing an authorized but unbuilt facility (Site 041) with a new search area identified as proposed Site 400. The search area is centered on Block 4914, Lot 2, located in the Pinelands Village of Chatsworth, Woodland Township. The amendment incorporates all other previously authorized AT&T facilities and does not expand AT&T’s overall tower configuration within the Pinelands. Instead, it substitutes proposed Site 400 for previously authorized Site 041. Consistent with the hierarchical siting policy established as part of the certification of the 2003 AT&T Plan (see Exhibit B), the proposed Site 400 maintains a one-half mile

search area radius. Mapping exhibits, propagation studies, and related documentation support the amendment.

B. Standards for Certification

The proposed amendment has been reviewed to determine whether it conforms to the standards for certification of an amendment to an LCF Plan set forth at N.J.A.C. 7:50-5.4(c)6v. The applicable standards and findings are outlined below.

1. Joint Submission by Providers of the Same Type of Service

N.J.A.C. 7:50-5.4(c)6v requires that a proposed LCF Plan amendment be sent by certified mail to all local communications providers offering the same type of service or holding a franchise within the Pinelands Area for review and comment. AT&T provided proof that notice of the proposed amendment was sent via certified mail to T-Mobile and Verizon, the other wireless providers operating within the Pinelands Area. Both providers are participants of other previously certified LCF Plans. The CMP authorizes the Commission to proceed with review of a proposed LCF amendment if other providers decline to participate. Neither T-Mobile nor Verizon has objected to, or requested to participate in, the current amendment process.

Accordingly, this standard for certification is met.

2. Review of Alternative Technologies

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include a review of alternative technologies that may become available for use in the near future. The amendment evaluates Distributed Antenna Systems (DAS), small cell installations, and modifications to existing nearby facilities. It explains that while such technologies may be appropriate in dense or urbanized environments, they are not technically capable of providing the wide-area, macro-cell coverage necessary to serve Chatsworth Village and its surrounding rural road network. In particular, federal requirements associated with the FirstNet public safety network require reliable coverage across broader geographic areas, including heavily forested and sparsely developed portions of the Pinelands.

Accordingly, this standard for certification is met.

3. Approximate Location of All Existing and Proposed Facilities

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments identify the approximate location of all existing and proposed facilities. The amendment identifies all existing on-air AT&T facilities within the Pinelands and incorporates by reference the previously authorized but unbuilt sites included in the 2003 AT&T Plan, except Site 041. Staff verified that the on-air sites correspond to those listed in the 2003 AT&T Plan. The amendment removes previously authorized but unconstructed Site 041, which was centered on Block 2201, Lot 6 in Tabernacle Township, which is located within Wharton State Forest in the Preservation Area District. The amendment adds proposed Site 400, a one-half mile search area centered on Block 4914, Lot 2 in the Pinelands Village of Chatsworth, Woodland Township.

Accordingly, this standard for certification is met.

4. Five- and Ten-Year Planning Horizons

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include five- and ten-year planning horizons. The amendment includes a planning horizon statement indicating that AT&T intends to rely on its existing and previously approved facilities, together with proposed Site 400, to provide commercial wireless and FirstNet emergency communications service over the next ten years. No additional tower sites within the Pinelands Area are proposed beyond proposed Site 400 and those previously authorized under the 2003 AT&T Plan.

Accordingly, this standard for certification is met.

5. Demonstrated Need to Serve Local Communication Needs of the Pinelands

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency* with the requirement that there is a demonstrated need for each proposed facility to serve the local communication needs of the Pinelands, including those related to public health and safety, as well as a need to locate the facility in the Pinelands in order to provide adequate service to meet these needs.

The amendment includes propagation analyses and mapping demonstrating that reliable service at the -95 dBm threshold is not currently available in significant areas of Chatsworth Village and surrounding roadways, and that neither Site 041 nor adjacent facilities can provide adequate coverage to meet the identified need. This coverage is necessary for emergency services operating within and in proximity to the Village of Chatsworth. It should also be noted that the Village of Chatsworth is located far from the boundaries of the Pinelands Area, and, therefore, it is not feasible to provide adequate service to the identified coverage gap from outside of the Pinelands Area.

The Commission's independent radiofrequency consultant reviewed the submitted analyses and concurs that there is demonstrated need for the facility based on a gap in coverage in the Village of Chatsworth that cannot be addressed by existing authorized sites or nearby facilities, and that the proposed Site 400 would satisfy that coverage gap (see Exhibit C).

Accordingly, this standard for certification is met.

6. Least Number of Facilities Necessary

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate that the facilities to be located in the Preservation Area District, the Forest Area, the Special Agricultural Production Area and the seventeen Pinelands Villages enumerated in N.J.A.C. 7:50-5.4(c)6 are the least number necessary to provide adequate service, taking into consideration the location of facilities outside the Pinelands. The Pinelands Village of Chatsworth is among the enumerated Pinelands Villages.

The amendment does not increase the number of AT&T's facilities within the Pinelands. Instead, it eliminates previously approved Site 041 and replaces it with proposed Site 400, which more effectively addresses the gap in coverage that exists in Chatsworth. It is also important to recognize that Site 041 is located in Wharton State Forest in an area that is far removed from the

population that needs to be served and where a host of factors would likely preclude the development of a new tower and the necessary infrastructure to support it. The removal of Site 041 is not anticipated to create a new coverage gap requiring an additional tower.

Accordingly, this standard for certification is met.

7. Use of Existing Communications or Suitable Structures

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency*, and note the need to demonstrate consistency during individual development applications, that existing suitable structures be used to the extent practicable. The amendment documents the evaluation of nearby telecommunications towers and other tall structures. Technical analyses indicate that available structures either lack sufficient height, are at capacity, or would not resolve the identified coverage gap even if modified. The Commission's radiofrequency consultant reviewed these analyses and agreed that co-location on existing structures would not provide adequate reliable coverage in Chatsworth Village (See Exhibit C). It is important to note that any application for the siting of a new tower at proposed Site 400 will require a reevaluation of suitable structures within the one-half mile search area.

Accordingly, this standard for certification is met.

8. Consistency with Siting Criteria for New Structures

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency*, and note the need to demonstrate consistency during individual development applications, that if an existing communications structure or other suitable structure cannot be used, then the antenna and any necessary supporting structure is located to meet the siting criteria contained in N.J.A.C. 7:50-5.4(c)4. Those siting criteria include requirements to minimize visual impacts to certain uses, structures, and specified areas. Additional restrictive siting criteria are provided for sites located outside of Regional Growth Area, Pinelands Towns and Pinelands Villages.

The proposed search area is centered within the Pinelands Village of Chatsworth, which is surrounded by lands within the Preservation Area District and Special Agricultural Production Areas. Areas outside the Village of Chatsworth contain extensive tracts of preserved land, areas of environmental constraints, limited to no lands that meet the siting requirements. However, the amendment identifies sites within the Village of Chatsworth where a tower is likely consistent with CMP siting criteria. The amendment also includes photographic inventory and simulations documenting the visual impacts of a tower proposed on Block 4914, Lot 2.

It is noted that approval of the plan amendment does not constitute approval of a specific tower location or development proposal. Full compliance with the detailed siting hierarchy, visual impact standards, and minimum environmental standards of the CMP must be demonstrated through a subsequent application for development. At the plan level, however, the Commission finds that the amendment demonstrates likely consistency with the siting criteria of N.J.A.C. 7:50-5.4(c)4.

Accordingly, this standard for certification is met.

9. Co-Location, Height Limits, and Joint Construction

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments acknowledge that support structures must be designed to accommodate other providers with overlapping service areas and must not exceed 200 feet in height. The amendment acknowledges these requirements and indicates that the proposed monopole will be designed to accommodate co-location consistent with CMP standards. The structure will not exceed the 200-foot maximum height and will be capable of accommodating additional carriers where technically feasible.

Accordingly, this standard for certification is met.

10. Plan for Shared Services

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include a plan for shared services, unless precluded by federal law or regulation, where such sharing would reduce the number of facilities. The amendment does not include a shared services plan. As stated in the previously certified 2003 AT&T Plan, AT&T maintains that shared services are precluded by federal law. No previously certified LCF Plan has included a shared services plan due to that legal interpretation.

Accordingly, this standard for certification is met.

Public Hearing

A public hearing to receive testimony concerning the First Amendment to the 2003 AT&T Plan was duly advertised, noticed and remotely conducted on January 14, 2026, at 9:30 a.m., with a live broadcast on the Pinelands Commission's public YouTube channel and an opportunity for the public to call in during the broadcast. Mr. Lanute conducted the hearing, which was held remotely and broadcast live on the Pinelands Commission's public YouTube channel. The public was provided the opportunity to call in during the public hearing to provide testimony. No testimony was provided.

Written comments on the First Amendment to the 2003 AT&T Plan were accepted through January 16, 2026. No written comments were received.

Conclusion

Based on the Findings of Fact cited above, the Executive Director has concluded that the First Amendment to the 2003 AT&T Plan complies with Comprehensive Management Plan standards for the certification of an amendment to a certified comprehensive local communications facilities plan. Accordingly, the Executive Director recommends that the Commission issue an order to certify the First Amendment to the 2003 AT&T Plan.

SRG/DBL
Attachments

**NEW CINGULAR WIRELESS PCS LLC D/B/A AT&T FIRST
AMENDMENT TO
TO THE 2003 AT&T PLAN**

1. PLAN INTRODUCTION AND BACKGROUND

This is a proposed amendment by New Cingular Wireless PCS, LLC d/b/a AT&T (hereinafter referred to as AT&T) to amend the comprehensive plans which have been approved by the Pinelands Commission. The approved plans are: a comprehensive plan for Cellular communications providers approved in 1998. The Cellular Plan participants were Bell Atlantic Mobile Systems (succeeded by Verizon Wireless), Comcast/Cellular One (succeeded by New Cingular Wireless PCS, LLC and which acquired AT&T around 2002-2003 and changed the name by which it does its wireless communications business to AT&T), and Nextel (which was merged with Sprint and then its assets acquired by T-Mobile)) The Cellular Plan was amended in 2000 by the PCS Plan. The Cellular and PCS Plans were amended by the AT&T Plan in 2003. The plans were amended in 2011 at the request of T-Mobile. The Plans were amended by Sprint in 2013, and finally, it was amended in 2012 by the Public Safety Tower Plan which was further amended in 2017. Consequently, this proposal by New Cingular Wireless PCS LLC to add One (1) additional site (hereinafter referred to as the Chatsworth Site is the Seventh Amendment to the original Cellular Plan. As with the previous plans and amendments, this proposed Seventh Amendment does not supersede but incorporates all of the prior approved plans and amendments thereto. Even though this is the 7th Amendment to the Cellular Plan, technically it is also the first amendment to the 2003 AT&T Plan. This plan shall therefore be titled the “First Amendment to the 2003 AT&T Plan” (AT&T Amendment) .

This AT&T Amendment is proposing a search area in the Chatsworth Village area of Woodland Township in order to perform two functions. First, to address deficiencies in its coverage in the area to be served by the proposed search area. Second, to provide FirstNet service to the area to be served by the site. FirstNet is the only nationwide wireless communications network that was designed and built specifically for first responders, and the extended public safety community. The FirstNet Authority (a duly created Federal Authority) awarded AT&T a contract to build and manage the Nationwide Public Safety Broadband Network. The radio frequencies dedicated for use by FirstNet can be installed at existing sites by using or slightly modifying the existing AT&T equipment and infrastructure. The FirstNet equipment therefore occupies essentially the same space as the AT&T system and therefore is not a separate system requiring its own comprehensive plan and

Pinelands Commission approval. Also, the search area for FirstNet is the same as for AT&T. The radio frequencies used by the FirstNet system are available for use by AT&T customers unless the FirstNet system is being used by first responders. The first responders take priority on the system. All future sites deployed by AT&T in New Jersey (including the Pinelands) will include and augment the FirstNet network as they are launched. Within the Pinelands specifically, no additional AT&T/FirstNet sites that would require an amendment to the approved wireless carrier plans are deemed necessary at this time. Rather, AT&T will use the proposed Chatsworth site and sites already approved by the Pinelands Commission.

The Chatsworth site is proposed to be located in or near a Pinelands Village (Chatsworth) adjoining the Pinelands Special Agriculture Production Area within Woodland Township. Within this area several candidates conforming to the requirements of the CMP have been located. However, for purposes of the plan we have identified a search area that we reference as "Proposed Site 400." (a/k/a Site 400). Site 400 has been analyzed herein to demonstrate that this proposed amendment is likely to satisfy the requirements of NJAC 7:50-5.4 (c) 3, and 4. AT&T understands that it will be the burden of the developer of a site in the search area to file an appropriate application with the Pinelands Commission and receive all required approvals for the actual site. This includes demonstrating consistency with N.J.A.C. 7:50-5.4(c)2,3,4, and 5. The Exhibits that have been submitted with and incorporated into this AT&T Amendment show Site 400 and demonstrate that there is at least one viable site.

It should also be noted that approved but unbuilt Site 041 is frequently mentioned in this Plan Amendment because it has already been approved and incorporated into several of the Plans that have been adopted including the AT&T Plan. Site 041 has been analyzed for potential use and it has been determined to be unbuildable due to issues with access and constructability and the fact that it is too far from Chatsworth Village to provide an adequate level of service. AT&T has determined that the proposed Chatsworth site eliminates the need for AT&T to utilize site 041 .

The AT&T Amendment includes the following:

1. Each of the sites previously approved by the Pinelands Commission contained in the Cellular Plan and the six amendments that followed. Please note that the Plans/Amendments and supporting documents are on the Pinelands Commission web site and the approved sites contained therein are included herein by reference.

2. Documentation in the form of a list of the sites from which AT&T is providing services in the Pinelands, together with cross references to certain sites approved for the Cellular and PCS plans on which AT&T is collocated designated as Exhibit 1. All of the sites on the list either deploy or are capable of deploying FirstNet service. This list together with the sites in the Plans and Amendments already filed, which are incorporated herein, together with the search area of the one site proposed herein, satisfies the requirement of N.J.A.C. 7:50-5.4 (c)6 to provide the approximate location of all proposed facilities.

3. Radio wave propagation maps. Each of these maps shows the radio wave coverage from either the existing AT&T coverage and/or the proposed coverage to be achieved by Site 400. The coverages are depicted with thresholds of -95 dBm, and -105dBm. Additionally each map has overlaid the outline of the Pinelands designated "Chatsworth Village". Each of the exhibits is designated as follows: Exhibit 2A titled "AT&T Existing Reliable Coverage"; Exhibit 2B titled "AT&T Proposed Reliable Coverage"; Exhibit 2C titled "AT&T Reliable Coverage with Original Site #41"; Exhibit 2D titled "AT&T Reliable Coverage with "Chatsworth" raised to 219' AGL; Exhibit 2E titled "AT&T Reliable Redundant Coverage with "Chatsworth" and adjacent site on-air and both raised to 219" AGL"; Exhibit 2F titled "AT&T Reliable Coverage with "Chatsworth raised to 219' AGL and Site 062 at 200' AGL." Exhibits 2A thru 2F demonstrate that: 1) there is a service coverage gap in the area and, therefore, a need for a site in the area proposed; 2) that existing tall structures in the general vicinity of the search area are not suitable structures for the service coverage needs ; 3) that the two previously approved AT&T sites that have not been built (sites 062 and 041 on the AT&T Plan Amendment) cannot meet the demonstrated coverage need; and, there are no other existing or Pinelands Commission approved sites that could reasonably be used in place of a new site in this area.

4. Exhibits 3A thru 3F. Each of the Exhibits 3A thru 3F is designated and described as follows:

Exhibit 3A/Map A - Existing ATT Site 041/Proposed Site 400 / Site Inventory - 6 Miles

Map A illustrates the Pinelands Management Areas in the +/- 6 mile radius surrounding existing ATT site 041. Developed, on-air sites are primarily

located to the west in the Growth and Development Areas, and Villages. Several unbuilt search areas located to the east, including ATT Site 041, are located in the Special Agricultural Production or the Preservation Areas. Chatsworth Village (Pinelands Village PMA) is located +/- 3 miles to the northeast of ATT Site 041 and is the only Pinelands Management Area other than the Special Agricultural Production or the Preservation Area surrounding ATT Site 041. Exhibit A also shows the approximate location of Site 400 and demonstrates that it is about 2 1/2 miles outside of the 1/2 mile search area of Site 041.

Exhibit 3B/Map B - Existing ATT Site 041/Proposed Site 400 / Open Space Inventory - 6 Miles

Map B illustrates the preserved Open Space in the +/- 6 mile radius in the area of existing AT&T Site 041 and proposed Site 400. The inventory shows a majority of the +/- 5 miles surrounding AT&T Site 041 and Site 400 are located within preserved Open Space Areas. The 0.5 mile search area surrounding AT&T Site 041 is completely located within the Franklin Parker Preserve (to the east) and the Wharton State Forest (to the west). It is important to note the Franklin Parker Preserve was established in 2003, after the ATT Site 041 was originally approved. The proposed AT&T Site 400 is located +/- 3 miles to the northeast of existing AT&T Site 041 in the Village of Chatsworth, outside the areas of preserved open space, and outside the Special Agricultural Production and Preservation Areas.

Exhibit 3C/Map C - Proposed Site 400 / Pineland Management Areas – 3 Miles

Map C illustrates the Pineland Management Areas in the +/- 3 mile radius surrounding proposed AT&T Site 400. The proposed site is central to surrounding authorized sites and centrally located within the Village of Chatsworth. The Pineland Management Areas in the +/- 0.5 mile radius surrounding the proposed AT&T Site 400 are limited to the Village of Chatsworth and the Special Agriculture Production Areas with Preservation Areas expanding beyond the 0.5 mile radius.

Exhibit 3D/ Map D - Proposed Site 400 / Chatsworth Village Zoning - 1 mile

Map D illustrates the designated open space, water bodies, wetlands, and zoning designations within the +/- 1 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed site is centrally located within the developable areas of the Chatsworth Village. Areas within the 0.5 mile radius surrounding proposed AT&T Site 400 include the only commercial zoning designations; the CN-Neighborhood Commercial and LI-Light Industrial Zoning Districts.

Exhibit 3E/Map E - Proposed Site 400 / Chatsworth Village Zoning & Land Use - 0.5 Mile

Map E illustrates the existing land uses and zoning designations within the +/- 0.5 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed site is located in Woodland Township's LI-Light Industrial Zoning District adjacent to non-residential and wooded land uses. Several parcels identified with a non-residential land use are located in the 0.25 mile radius surrounding proposed AT&T site 400.

Exhibit 3F/Map F - Proposed Site 400 / Chatsworth Village Zoning & Aerial - 0.25 Mile

Map F illustrates an aerial photograph and zoning designations within the +/- 0.25 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed location will allow a wireless communications tower to be constructed in a designated commercial and/ or industrial zoning district, on previously developed lands with non-residential land uses, and at a location buffered from residential land uses and roadways with existing, preserved, wooded vegetation.

The Exhibit Maps 3A to 3F demonstrate that a proposed facility in the area of Site 400 is likely to be consistent with NJAC 7:50-5.4C6, and as required therein also demonstrates that a site in the area would likely be consistent with NJAC 7:50-5.4C2,3,and 4 and 5.

5. Attached as Exhibit 4A thru 4J are a Photographic Inventory & Simulations of proposed AT&T Site 400, with a 160-foot Monopole-Wireless Telecommunications Facility. Exhibit 4A is the photographic key map showing a proposed location of Site 400 and the location from which each of the following photographs were taken. Note that in Exhibits 4B, 4C, 4D, and 4E that the heavy growth made it so that viewing of the monopole from these locations was not possible. Instead, a yellow dotted vertical line with a small ball at the top depicts where the monopole would be. The photographs demonstrate consistency with Pinelands regulations 7:50-5.4 (c) 4ii, that the siting minimizes visual impacts from publicly dedicated roads and highways etc. It is also understood that a demonstration will need to be made that the actual site when proposed will adhere to the buffer and setback requirements established in the certified land use ordinance of Woodland Township.

5. Attached as Exhibit 5 is an email from John Kafka of the Burlington County Department of Public Safety, Division Head-Communications Support Division, that advises that the Burlington County radio tower on Canal St., in the Chatsworth section of Woodland Township, is maxed out and has no room to co-locate any other carriers. Consequently it was eliminated from consideration.

NEW JERSEY PINELANDS COMPREHENSIVE PLAN REQUIREMENTS

Pursuant to N.J.A.C. 7:50-5.4(c)6 iv, applicants may propose Amendments to an approved plan from time to time. Such Amendments shall be reviewed by the Commission according to the requirements set forth in subsection (c)6.

N.J.A.C. 7:50-5.4(c)6 provides (in summary): If the (proposed wireless communications) facility is proposed to be located in any Pinelands management area other than a Regional Growth Area or a Pinelands Town, a comprehensive plan for the entire Pinelands Area must be submitted to the Pinelands Commission for certification. Said plan shall also demonstrate that the facilities to be located in

“the...Pinelands Village of...Chatsworth..”, are the least number necessary to provide adequate service. AT&T submits that the information submitted in connection with this Plan Amendment satisfy these requirements.

Based on the information submitted herein AT&T submits that:

- Site 400 as depicted on the Exhibits is located within a Pinelands Village within Woodland Township’s LI (Light Industrial) Zone.
- No visual impacts are expected from the special scenic areas referenced in N.J.A.C. 7:50-5.4(c)4iii. or iv. given the distance of the site from those features.
- There are contiguous parcels to this site containing existing residential dwelling units. However, Woodland Township has not adopted any special buffer or setback requirements for local communications facilities. Therefore, only general setback and buffer standards contained in their code would need to be met for this site in order to satisfy N.J.A.C. 7:50-5.4(c)4v.
- The wetlands that exist in the area are far enough away that they do not negatively impact development.
- The information submitted herein demonstrates that it is likely when an application is submitted for an actual site in this area that it will be consistent with the requirements of the NJAC 7:50-5.4 et. seq.

The Applicant recognizes that an application for a site in this area will need to provide the required information for the specific site for which the application is made. The following is information intended to demonstrate that this plan satisfies the requirements of the NJAC 7:50-5.4 et seq.

DEMONSTATION OF NEED/SEVICE GAP

Exhibits 2A-2G graphically show the AT&T existing and proposed coverage in the area of Site 400. AT&T engineers have determined that -95dBm and 105 dBm are signal strengths that will be able to provide reliable data/streaming services, voice services and FirstNet service which will satisfy necessary criteria for reliable service such as covering population centers, and connecting to adjacent sites so that there are no breaks in the coverage, and affording greater coverage to areas for use by First Responders. Exhibit 2A shows that there is a gap in the existing coverage. Exhibit 2B has added the coverage that will be achieved from the proposed site 400.. The coverage to be achieved from the Site 400 clearly fills in the gap that exists in this area. Which includes the more populous area of the Village of Chatworth, the major roads, and a significantly large area that will benefit from enhanced public safety. .

DEMONSTRATION THAT EXISTING TALL STRUCTURES ARE NOT SUITABLE TO PROVIDE ADEQUATE SERVICE

Exhibit 3A shows all of the sites surrounding the proposed Chatsworth site 400. There are two sites shown that are not providing any service. The first such site is the “Burlington County Guyed Tower at -39.84763, -74.70292”. This site is also on the Public Safety Tower Plan as “Chatworth” and is shown as such on Exhibits 3A and 3B. With respect to this tower, inquiries were made to Burlington County as to the availability of space on that tower. John Kafka, Dept. of Public Safety, Division Head-Communications Support Division in his email of August 10, 2023, attached as Exhibit 5, advised that the Tower is filled to capacity and he lists the entities occupying the space. Mr. Kafka advises “...we have no room to co-locate any other carriers.” The second such site is the “Fire Tower located at -39.807354, -74.589299. The fire tower is over 3 miles from the Chatworth search area, in the middle of open preserved space. The fire tower was deemed unsuitable because of its distance from the area of need and because it could not be serviced by power or telco due to open space restrictions. Exhibit 2A also shows all of the other existing sites in the area and the radio wave propagation from each. None of the sites is capable of providing reliable coverage to the Chatsworth area. Of note is that Exhibit 2D and E show the site identified

as “ATC 222’ Guyed tower -3986444, -74.53968. It so happens that there are two towers in close proximity to each other at this site. AT&T is already on one of the towers, and the other tower would provide redundant coverage. Exhibit 2D and E demonstrate that even if AT&T were able to raise the height of its antennas to 219’ on either of these towers, that the coverage would still not be adequate to provide reliable service in the Chatsworth Village area. The conclusion is that there on no suitable existing tall structures that can be used to provide adequate service.

DEMONSTRATION THAT EXISTING APPROVED AT&T SITES 041 AND 062 CANNOT MEET THE DEMONSTRATED NEED

ANALYSIS OF SITE CP 006 / PCS 041 / ATT 041

Site CP 006 / PCS 041 / ATT 041 is located west of the municipal boundary between Woodland and Tabernacle Township in Burlington County. The site is located south of New Gretna Chatsworth Road and Speedwell Place Road, both of which are unimproved roadways at Lat. 39.797; Long. -74.581. The approved site is located on the boundary of the Pinelands Preservation Area and the Pinelands Special Agricultural Production Area.

AT&T’s Professional Planner, Brian Seidel, drove the area for both site 041 and 062. Mr. Seidel found that the approved site location for 041 is very rural and generally undeveloped. Apple Jack Road is the closest improved roadway, located approximately 1.4 miles to the northeast of the approved site location. Two residential properties were identified on Apple Jack Road. A tower has not been constructed in this location. Site CP 006 / PCS 041 / ATT 041 was eliminated from consideration due to the distance from the intended RF coverage area and the lack of available utilities. A coverage map Exhibit 2C is attached showing that the coverage from 041 is not sufficient to eliminate the need for the proposed site. Finally as has been previously stated herein AT&T has determined that the proposed Chatsworth site eliminates the need for AT&T to utilize site 041.

ANALYSIS OF SITE PCS 062 / ATT 062

Site # PCS 062 / ATT 062 is located southwest of NJ Highway 73 just south of the intersection of NJ Highway 73 and Lauries Road on an unimproved dirt road at Lat. 39.822; Long. -74.448.

The previously approved site PCS 062 / ATT 062 is located approximately 4.0 miles to the east of site 400. It is located within the P-P Pinelands Preservation Area of Woodland Township, Burlington County. A tower has not been constructed in this location.

The PCS 062 / ATT 062 location is very rural and generally undeveloped. State Highway 72 is the closest improved roadway, located approximately 0.4 miles to the northeast of the approved site location. No developed properties were observed within 1.0 mile of the approved location. Site PCS 062 / ATT 062 was eliminated from consideration due to the lack of population, the distance from the intended RF coverage area, and the lack of available utilities. A coverage map Exhibit 2F is attached showing that the coverage from 062 is not sufficient to eliminate the need for the proposed search area.

DEMONSTRATION THAT THE SITING REQUIREMENTS OF NJAC 7:50-5.4 (C) 4vii REQUIRING SITING AT THE LOCATON WHICH WILL HAVE THE LEAST VISUAL IMPACT ON THOSE USES AND RESOURCES DESCRIBED IN 4ii, 4iii, AND 4v.

As set forth above, the attached Exhibits 4A thru 4J demonstrate that the antenna and supporting structure can be sited at the location that is consistent with the locational requirements of N.J.S.A 7:50-5.4(C)vi. This Plan Amendment recognizes that it will be the Applicants burden to demonstrate satisfaction with the Pinelands regulations at the time that an application is made for Pinelands approval of a specific site. AT&T has provided information herein to demonstrate that at least one site does satisfy the requirements cited in 7:50-5.4(c)4 ii, iii, and v. As support for this statement that at least one site satisfies N.J.A.C. 7:50-5.4 (c)4ii, please see Exhibits 4A thru 4J.

As support that the plan satisfies the requirements of N.J.S.A. 7:50-5.4 (c)4iii, Mr. Seidel advises:

The Pine Plains are located approximately 9 miles to the east of the proposed site. (Site 400). N.J.A.C. 7:50-6.105(a) designates 'wild and scenic' rivers and requires structures within 1,000 feet of the centerline of these identified rivers to be 'designed to avoid visual impacts' as viewed from these rivers. There are no designated wild and scenic rivers within 1,000 feet of the proposed facility. The closest identified resource to the proposed facility is 'The Wading River-Confluence with the Mullica River to Route 263 Crossing at Speedwell', which is located 3.8 miles to the south to the subject property

As support that the plan satisfies the requirements of N.J.S.A. 7:50-5.4 (c)4v, we note that Site 400 is of sufficient size to be able to comply with all buffer and setback requirements. At the time that an actual application is made the plans and drawings in support of the application will demonstrate compliance

FUTURE SITE LOCATIONS / 5-10 YEAR HORIZON PLAN

Pursuant to N.J.A.C. 7:50-5.4 (c) 6, the Plan shall provide 5 and 10 year horizons for future FirstNet/AT&T site locations. FirstNet communications service is provided through AT&T's wireless network, therefore, the provided inventory of existing and Pinelands Commission approved site locations will be utilized and prioritized over the next 5-10 years to provide AT&T as well as FirstNet service. It is also worth repeating in regard to the 5 and 10 year Plan: All future sites deployed by AT&T in New Jersey (including the Pinelands) will include and augment the FirstNet network as they are launched. Within the Pinelands specifically, no additional AT&T/FirstNet sites that would require an amendment to the approved wireless carrier plans are deemed necessary at this time. Rather, AT&T will use the proposed Chatsworth site and sites already approved by the Pinelands Commission.

Review of Alternate Technologies that may become available for use in the near-future N.J.A.C. 7:50-5.4 (c)6

As set forth by each of the Plans and Amendments approved by the Pinelands Commission, the primary alternatives to building sites using towers capable of being extended to 200' are Distributed Antenna Systems technology, a/k/a DAS and small cell technology. Neither system is considered reliable in an environment that covers large open spaces, forests and waterways. While DAS systems can be used outdoors, they are generally deployed to provide improved INBUILDING service. The radio frequency coverage from a DAS system is directed along the road on which it is placed and each site only covers a very limited distance (a thousand feet or so). Similarly, a small cell also has a very small RF footprint. Such systems would not achieve coverage goals for FirstNet which needs the ability of a macro site to cover areas of 2 mile radius or more so that first responders can fight fires and respond to emergencies far from roads. Further, many areas of the Pinelands do not have sufficient number and placement of existing structures, such as utility poles, to accommodate a DAS or small cell deployment. Also, the CMP regulations regarding ground disturbance as well as environmental factors involving various species, plants and wild and scenic areas also make DAS and small cells impractical. Finally small cells are also, in many instances, on small towers and would be subject to all of the same regulations as set forth in the CMP.

Approximate location of all proposed facilities per N.J.A.C. 7:50-5.4 (c)6

Attached as Exhibit 1 is a list of all of the sites on which AT&T is located and which have or are capable of having FirstNet service located thereon. This list together with the sites approved in the Plans and Amendments already approved by the Pinelands Commission which are incorporated herein, together with the location of the one site proposed herein, satisfies the requirement of N.J.A.C. 7:50-5.4 (c)6 to provide the approximate location of all proposed facilities.

Co-Locations

AT&T has in the previous plans already agreed to abide by the requirement to provide co-location. AT&T also agrees to allow co-location in accordance with its prior representations to the proposed Chatworth tower.

Conclusion

The addition of one site, in the Chatsworth area, to the existing Plans in which AT&T or its predecessors in interest have participated is consistent with those Plans and satisfies the requirements set forth in N.J.A.C. 7:50-5.4 et seq. This Amendment has the added benefit of allowing FirstNet service to be deployed in the

Chatsworth Village area thereby enhancing the public health and safety of the entire area.

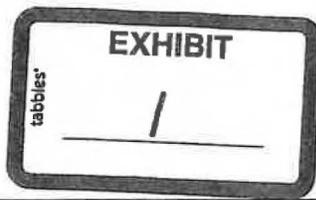
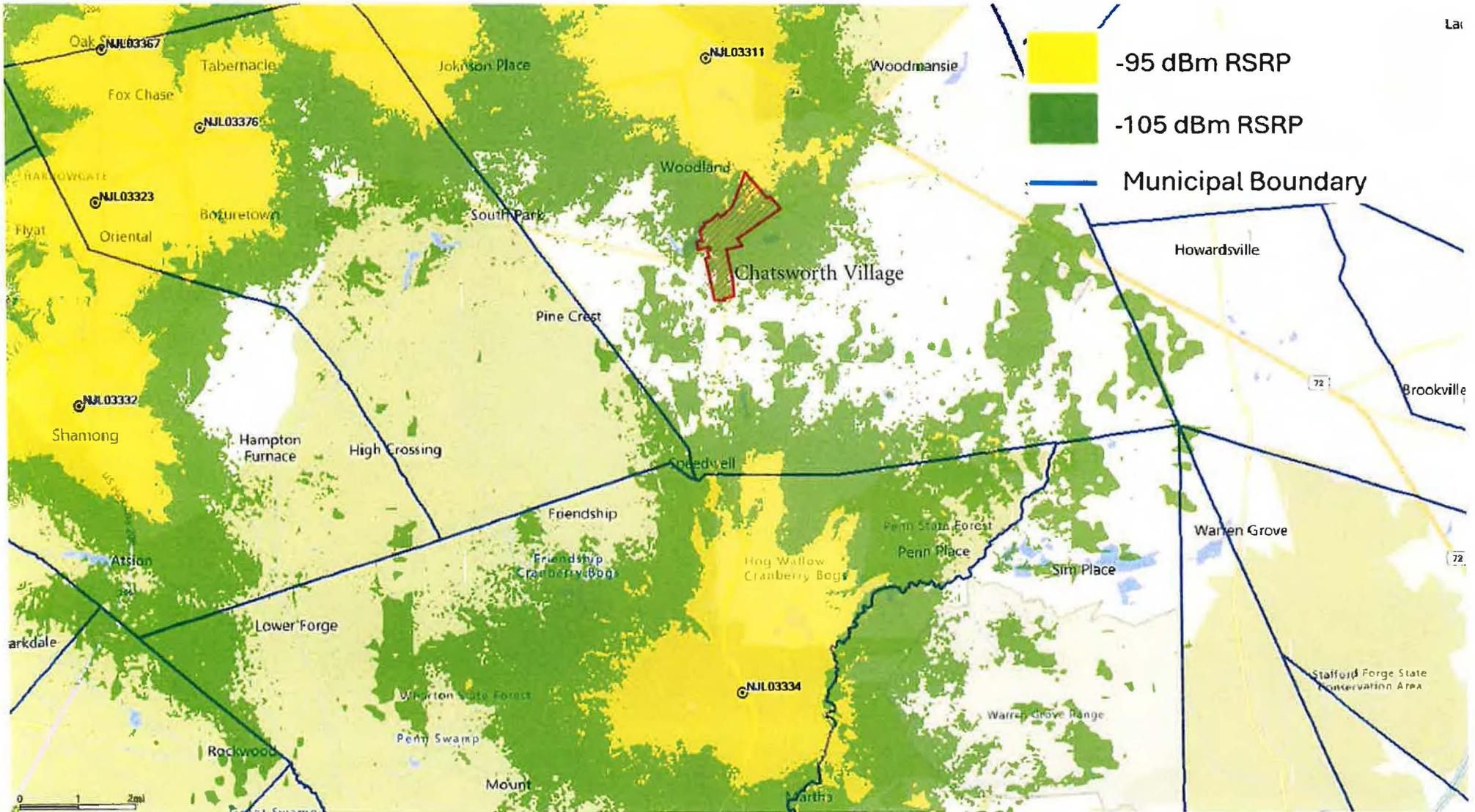


Exhibit 1: Existing AT&T On-Air Sites

September 2025

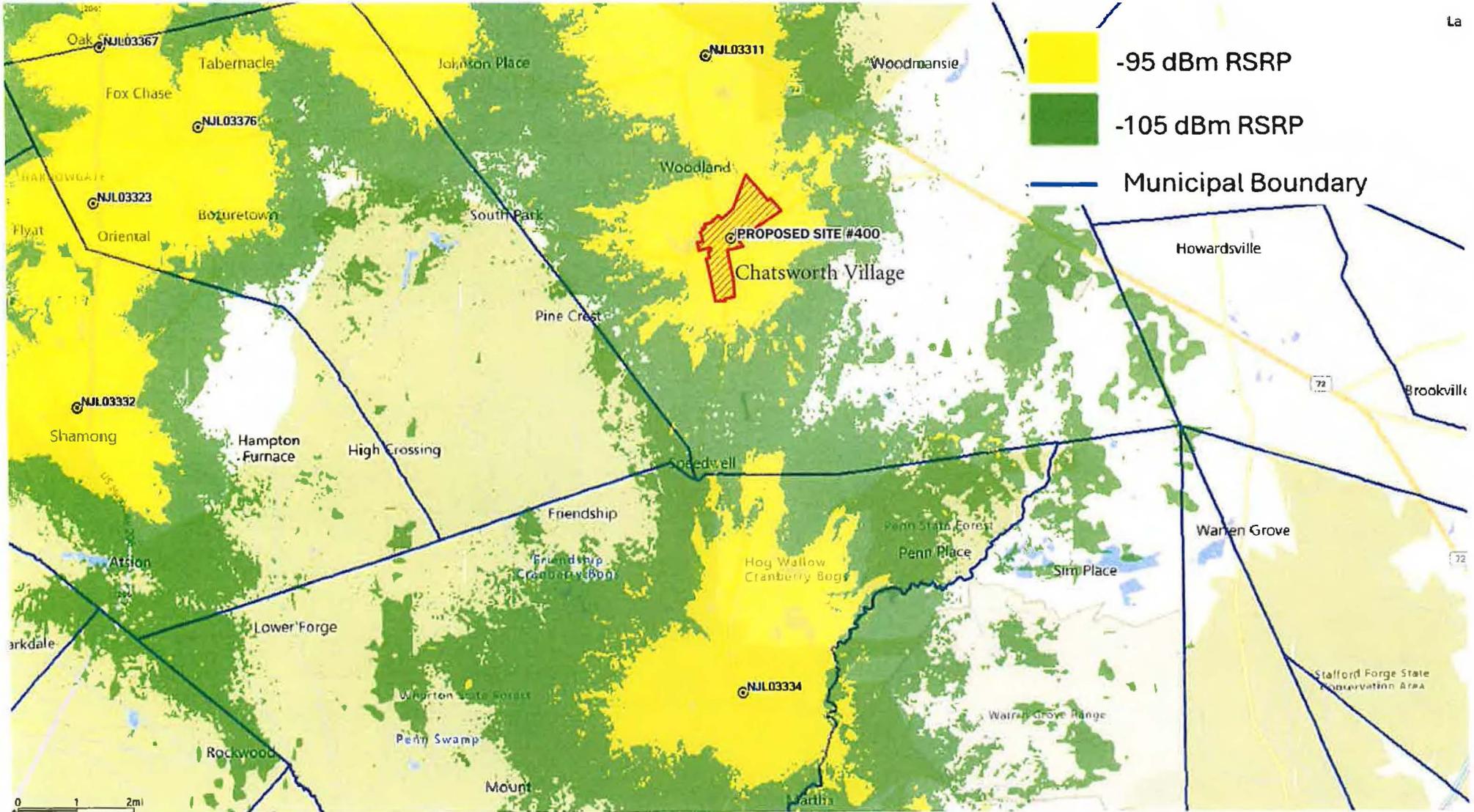
| Latitude | Longitude | Name | PCS Plan | Cellular Plan | ATT Plan |
|-----------------|-------------------|---------------------------|----------|---------------|----------|
| 39.64680 | -74.939883 | CECIL | 1 | 30 | 1 |
| 39.74417 | -74.911940 | WILLIAMSTOWN JUNCTION | 2 | | 2 |
| 39.51903 | -74.692894 | LAURELDALE HAMILTON | 7 | 17 | 7 |
| 39.48111 | -74.849194 | MIZPAH | 11 | 34 | 11 |
| 39.56580 | -74.817000 | PENNY POT | 14 | | 14 |
| 39.89667 | -74.593389 | WOODLAND | 20 | | 20 |
| 39.86442 | -74.539667 | CHATSWORTH | 22 | 41 | 22 |
| 39.77902 | -74.742394 | ATIONS | 23 | 11 | 23 |
| 39.86503 | -74.809190 | MEDFORD LAKES | 27 | 8 | 27 |
| 39.70792 | -74.530678 | JENKINS | 29 | 25 | 29 |
| 39.67108 | -74.773831 | DUTCHTOWN | 30 | 12 | 30 |
| 39.62232 | -74.645519 | BATSTO | 31 | 16 | 31 |
| 39.40050 | -74.826700 | DOROTHY NJ | 32 | 35 | 32 |
| 39.79639 | -74.370280 | BARNAGET | 35 | 5 | 35 |
| 39.95667 | -74.379170 | MANCHESTER | 39 | 24 | 39 |
| 39.47920 | -74.698303 | MAYS LANDING EAST | 43 | | 43 |
| 39.72266 | -74.858325 | WATERFORD WORKS | 47 | | 47 |
| 39.63300 | -74.806000 | HAMMONTON NORTH | 48 | | 48 |
| 39.71556 | -74.291940 | STAFFORD | 59 | 42 | 59 |
| 39.40605 | -74.571180 | SHORE MALL | | 19 | 300 |
| 39.44724 | -74.573086 | ATLANTIC CITY AIRPORT | | | 304 |
| 39.43860 | -74.683603 | BABCOCK ROAD | | 50 | 308 |
| 39.45281 | -74.746270 | MAYS LANDING | | | 309 |
| 39.57612 | -74.865650 | CEDAR LAKE NJ | | 14 | 310 |
| 39.44883 | -74.631508 | EXIT 12 AC EXPWY | | | 313 |
| 39.48935 | -74.533261 | STOCKTON UNIVERSITY SOUTH | | | 315 |
| 39.48310 | -74.651700 | HAMILTON TOWNSHIP | | | 322 |
| 39.98770 | -74.551803 | HANOVER FURNACE | | | 328 |
| 39.82958 | -74.736366 | TABERNACLE | | 26 | 331 |
| 39.87967 | -74.647354 | BURRS MILL | | 7 | 332 |
| 39.95298 | -74.551109 | Mt Misery | | | 336 |
| 39.84529 | -74.829040 | TAUNTON LAKE | | 28 | 337 |
| 39.85708 | -74.870750 | KINGS GRANT | 26 | 44 | 338 |
| 39.60503 | -74.433920 | GREENBUSH | | | 340 |
| 39.78483 | -74.911700 | BERLIN TOWNSHIP | | | 343 |
| 39.75371 | -74.882797 | ATCO | | 29 | 344 |
| 39.70740 | -74.895103 | BRADDOCK | | | 348 |
| 39.28657 | -74.754722 | TUCKAHOE | | 51 | 352 |
| 39.60376 | -74.755250 | SWEETWATER NJ | | | 363 |
| 39.84780 | -74.702500 | EAST TABERNACLE | | | 364 |
| 39.73780 | -74.869400 | CHESILHURST | | | 366 |
| 39.42108 | -74.584140 | PLEASANTVILLE WEST | | 56 | 371 |
| 39.36318 | -74.927675 | HUNTERS MILL | | 21 | 372 |
| 39.61530 | -74.855003 | CE WATER TANK | | | 373 |
| 39.90222 | -74.822778 | MEDFORD | 45 | 43 | |
| 39.24201 | -74.813578 | WOODBINE | | | |
| 39.48621 | -74.600130 | POMONA NJ | | | |
| 39.54703 | -74.638194 | EGG HARBOR | | 33 | |
| 39.55528 | -74.746392 | ELWOOD | | 31 | |
| 39.61750 | -74.820556 | HAMMONTON | | 46 | |
| 39.67875 | -74.869806 | BLUE ANCHOR | | 45 | |
| 39.68142 | -74.994000 | WILLIAMSTOWN | | | |
| 39.77397 | -74.828854 | PARKDALE | | | |
| 39.86732 | -74.733798 | TANGLEWOOD | | | |
| 39.96889 | -74.590833 | BROWNS MILLS | | 40 | |
| 40.00120 | -74.623300 | FORT DIX | | | |

AT&T Existing Reliable Coverage



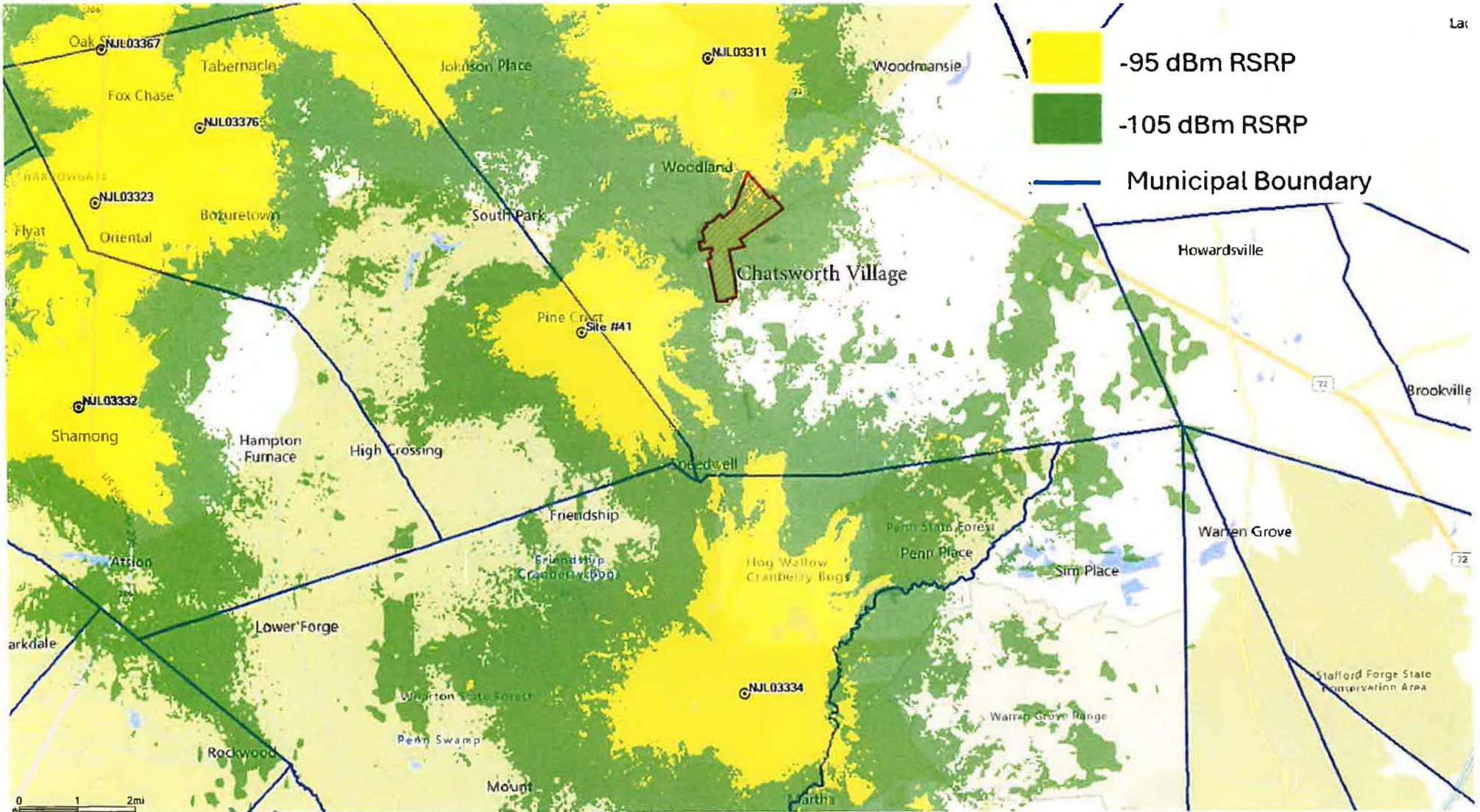
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Proposed Reliable Coverage



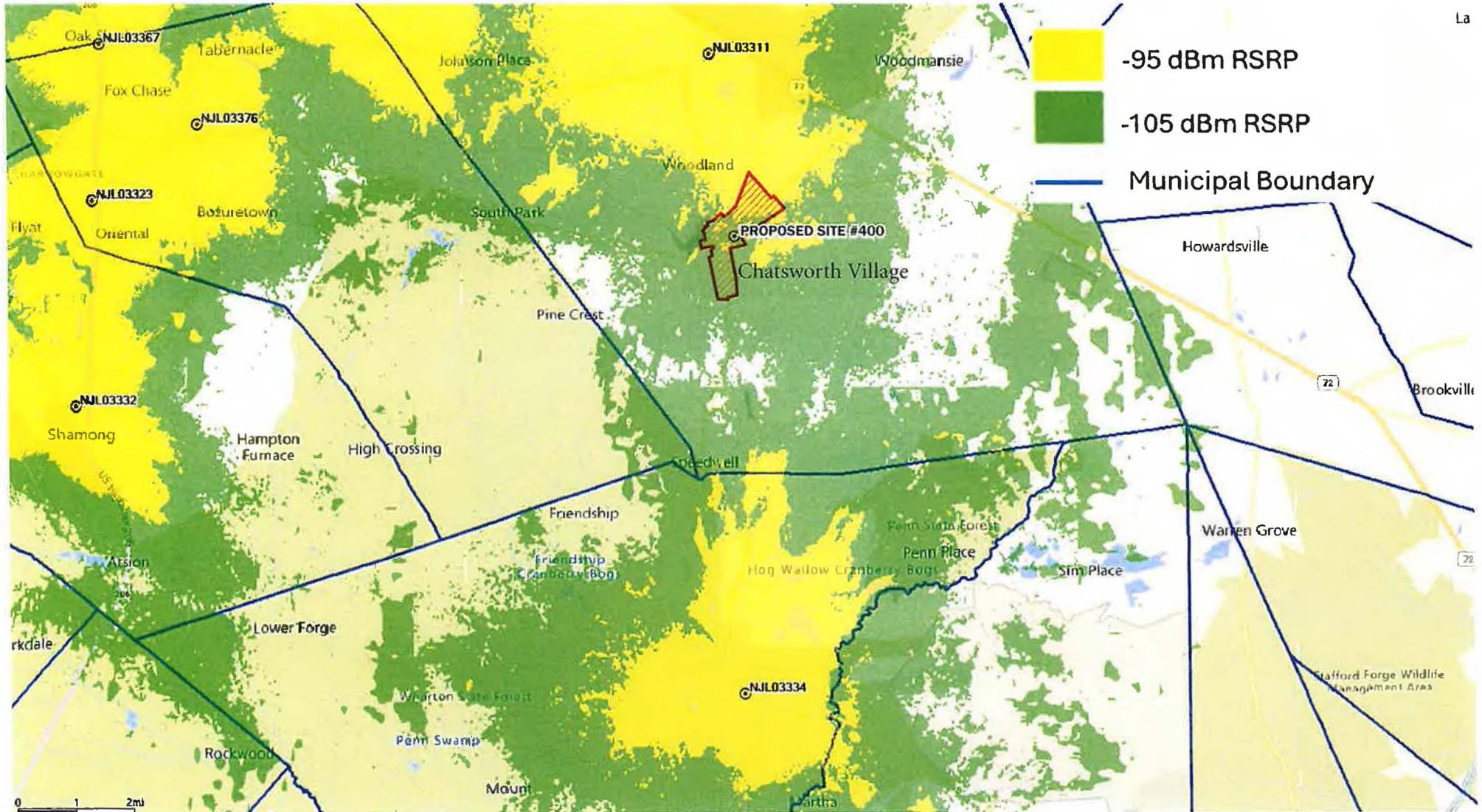
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Coverage with Original Site #41



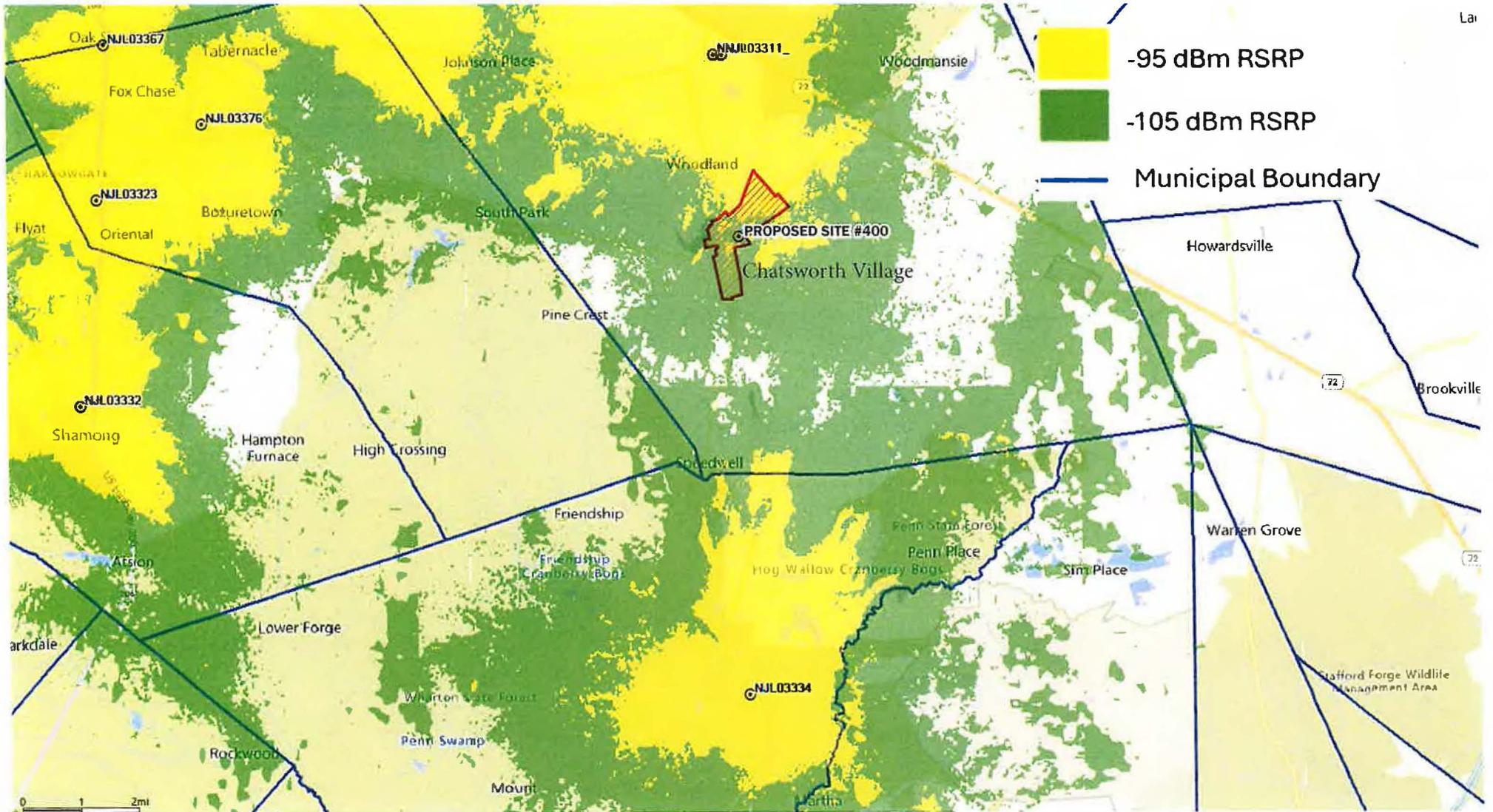
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Coverage with "Chatsworth" raised to 219' AGL



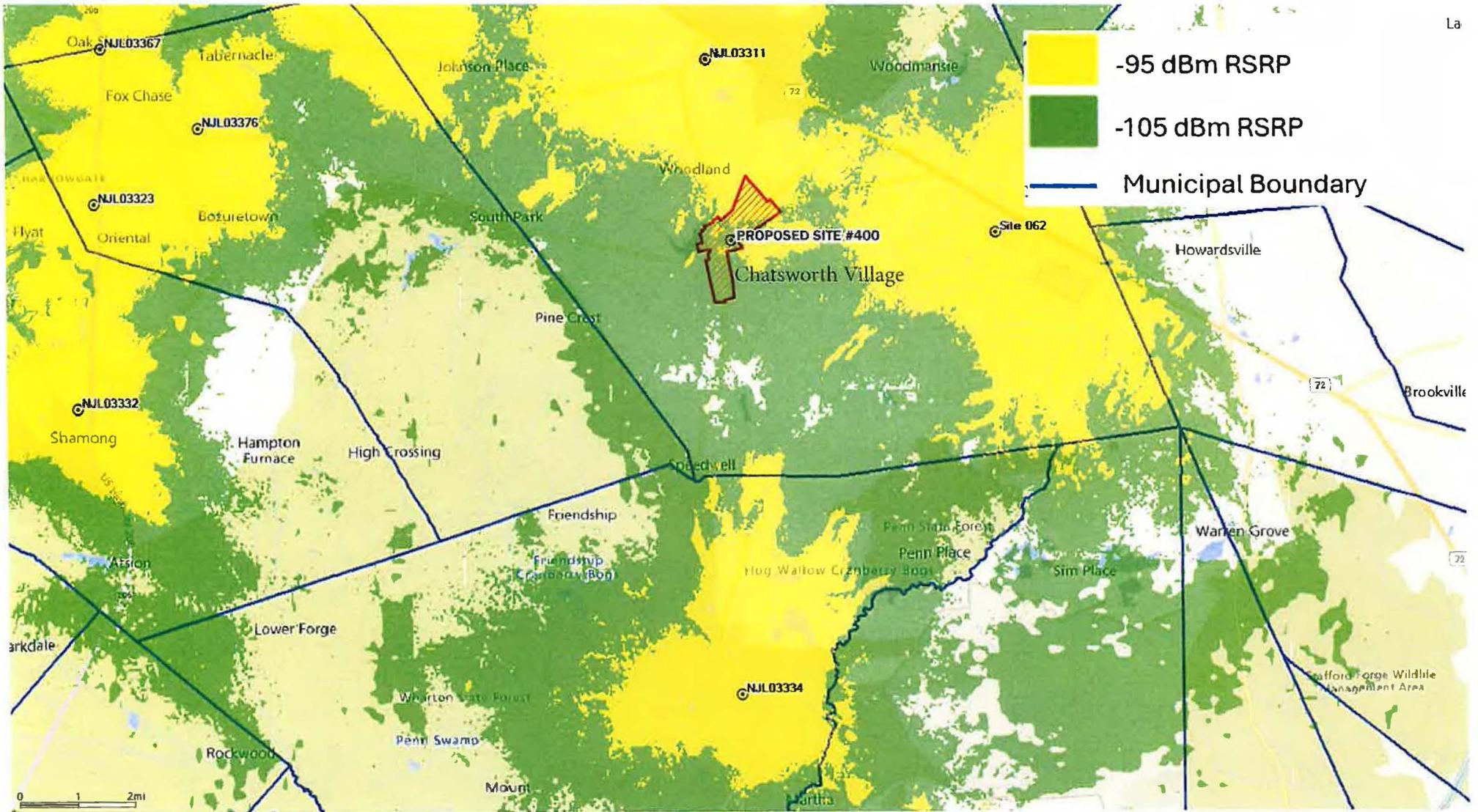
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Redundant Coverage with “Chatsworth” and adjacent site on-air and both raised to 219’ AGL

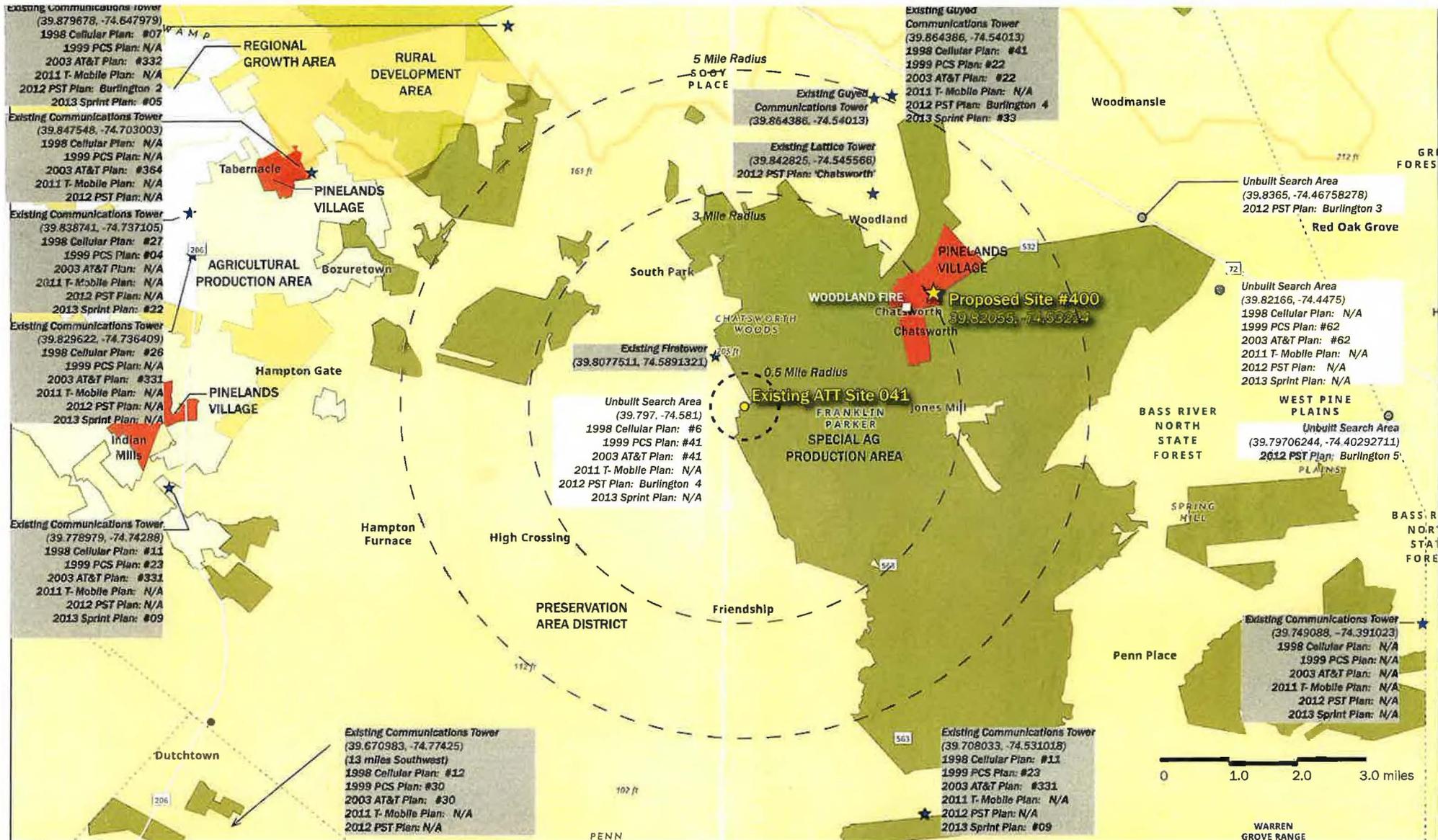


PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dbmEng.com

AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL and “Site 062” at 200’ AGL



PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com



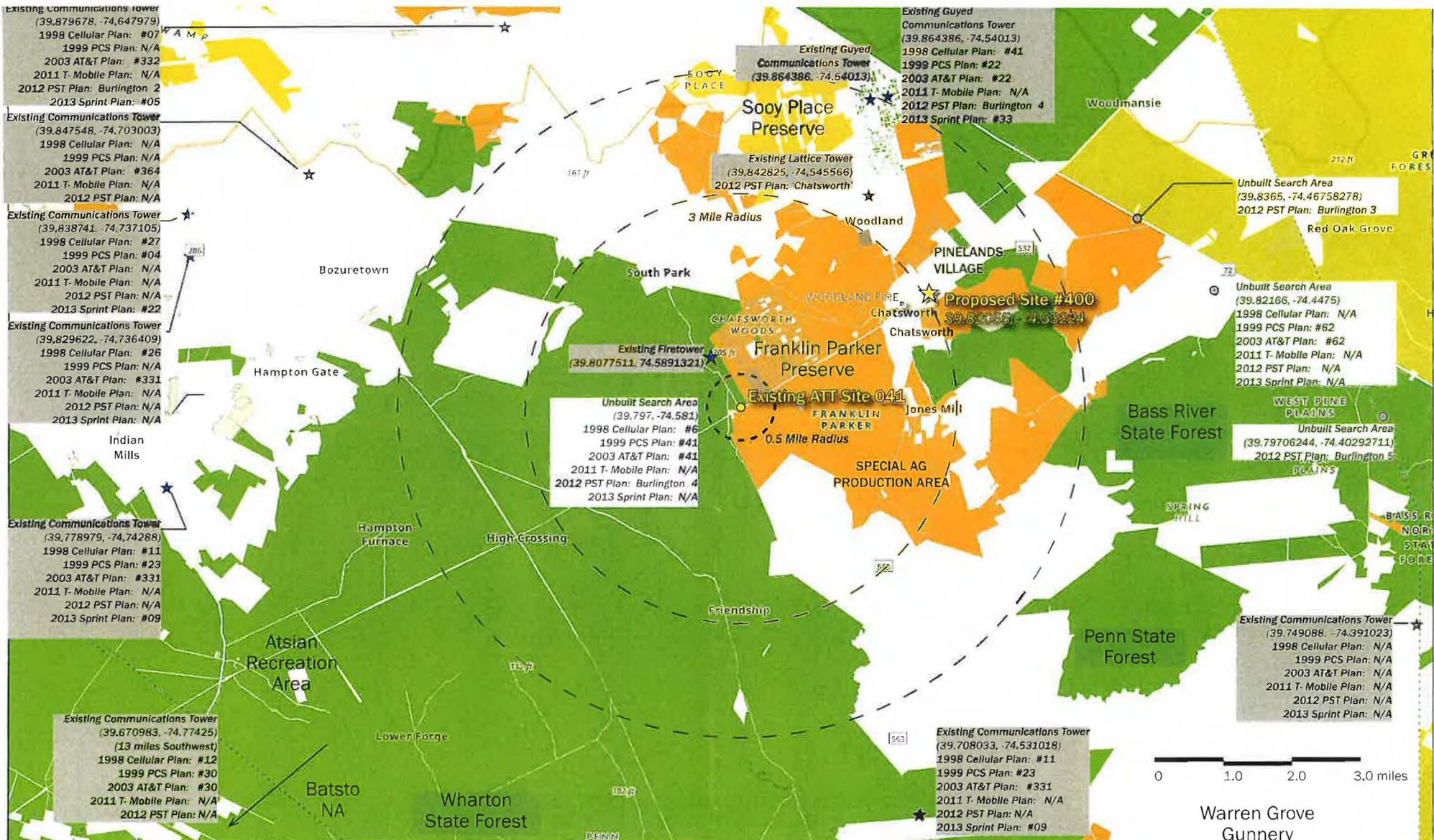
Map A - Existing ATT Site 041/ Proposed Site 400/ Site Inventory - 6 Miles

Woodland Township, Burlington County, NJ

September 25, 2025



- Graphics Key
- ★ Existing Facilities and Tall Structures
 - Unbuilt Search Areas

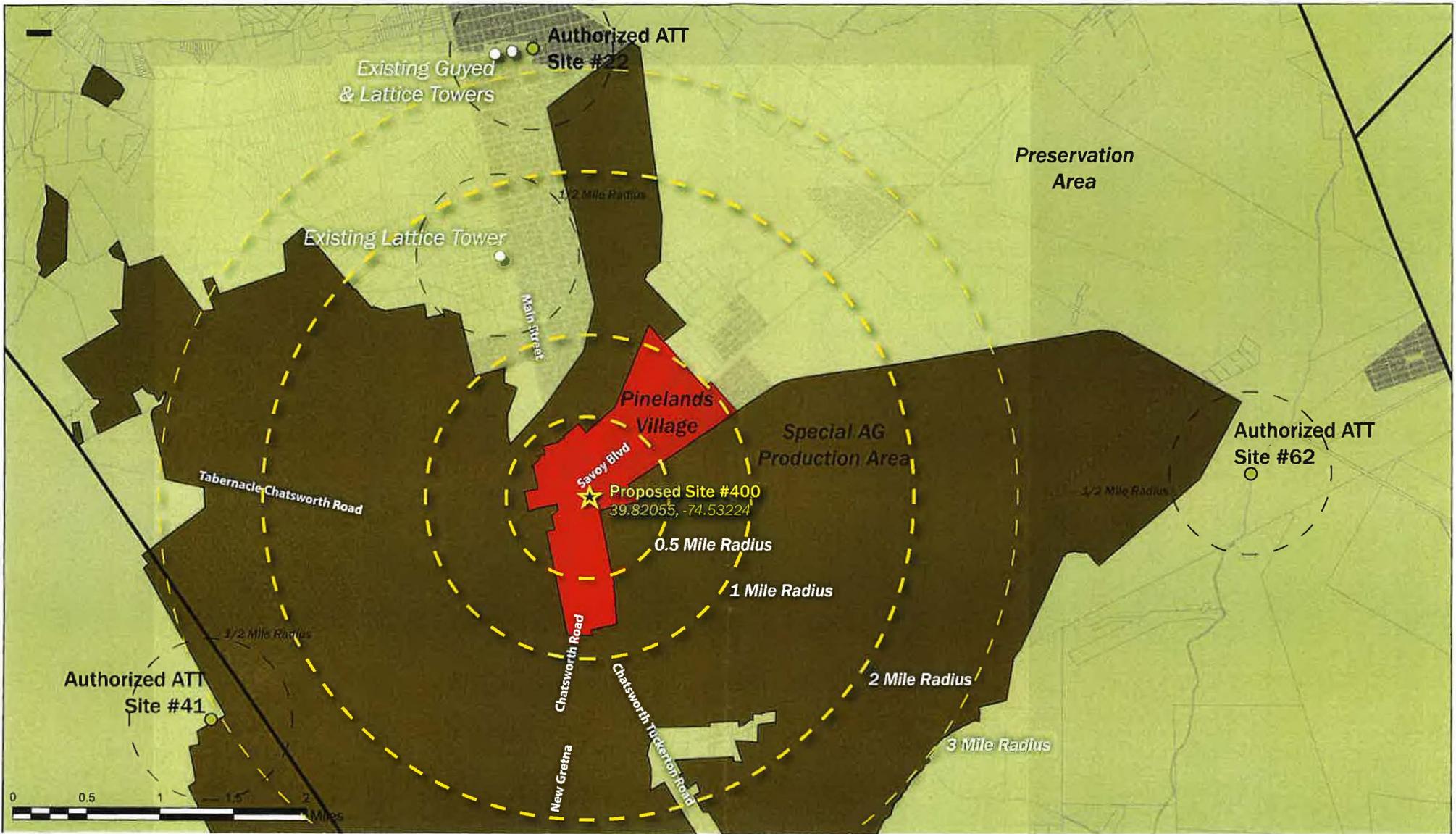


Map B - Existing ATT Site 041/ Proposed Site 400/ Open Space Inventory - 6 Miles
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 3 B



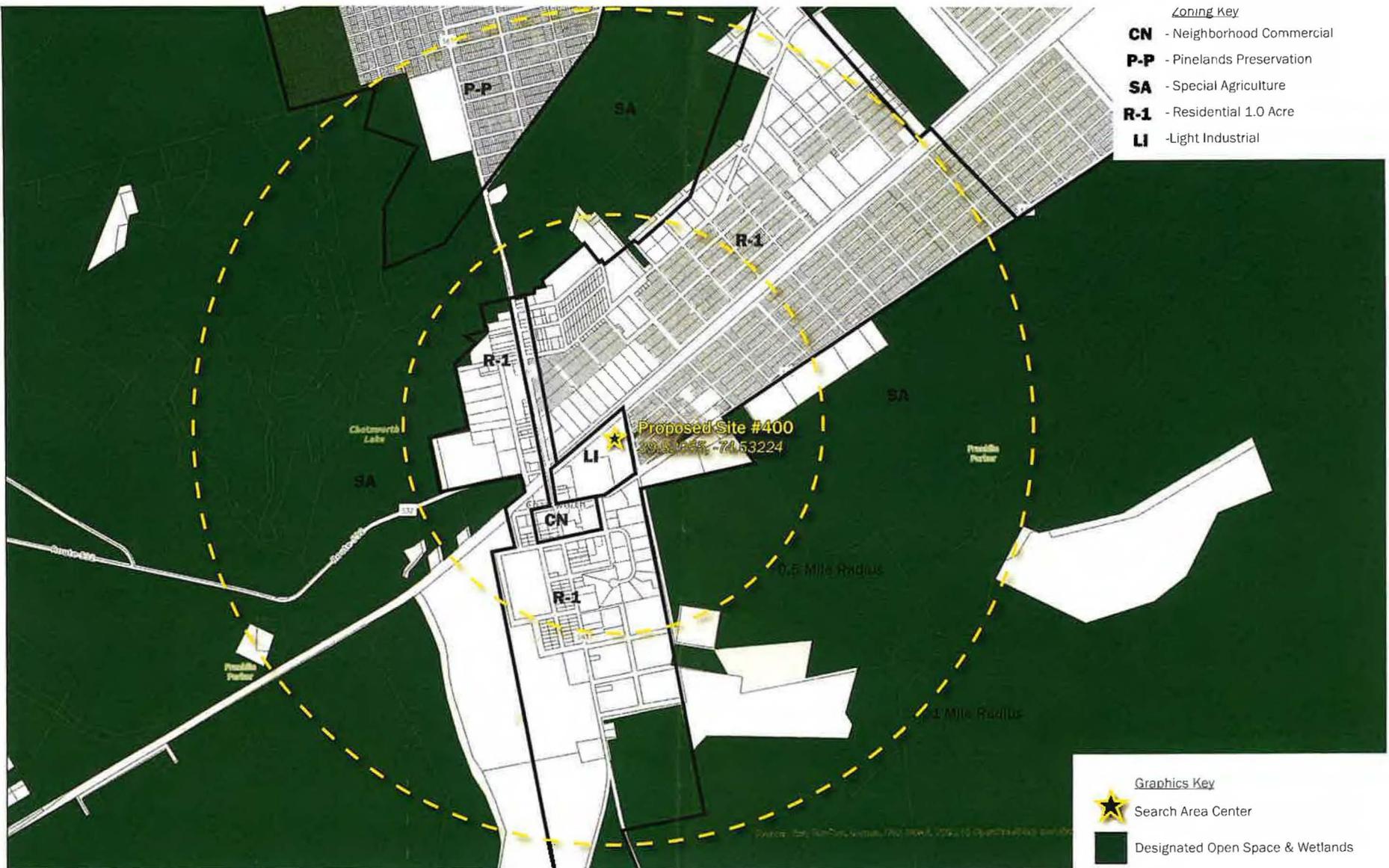
Warren Grove Gunnery
 Graphics Key
 ★ Existing Facilities and Tall Structures
 ⊙ Unbuilt Search Areas



Map C - Proposed Site 400/ Pineland Management Areas - 3 Miles
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 3C

- Zoning Key
- CN** - Neighborhood Commercial
 - P-P** - Pinelands Preservation
 - SA** - Special Agriculture
 - R-1** - Residential 1.0 Acre
 - LI** - Light Industrial

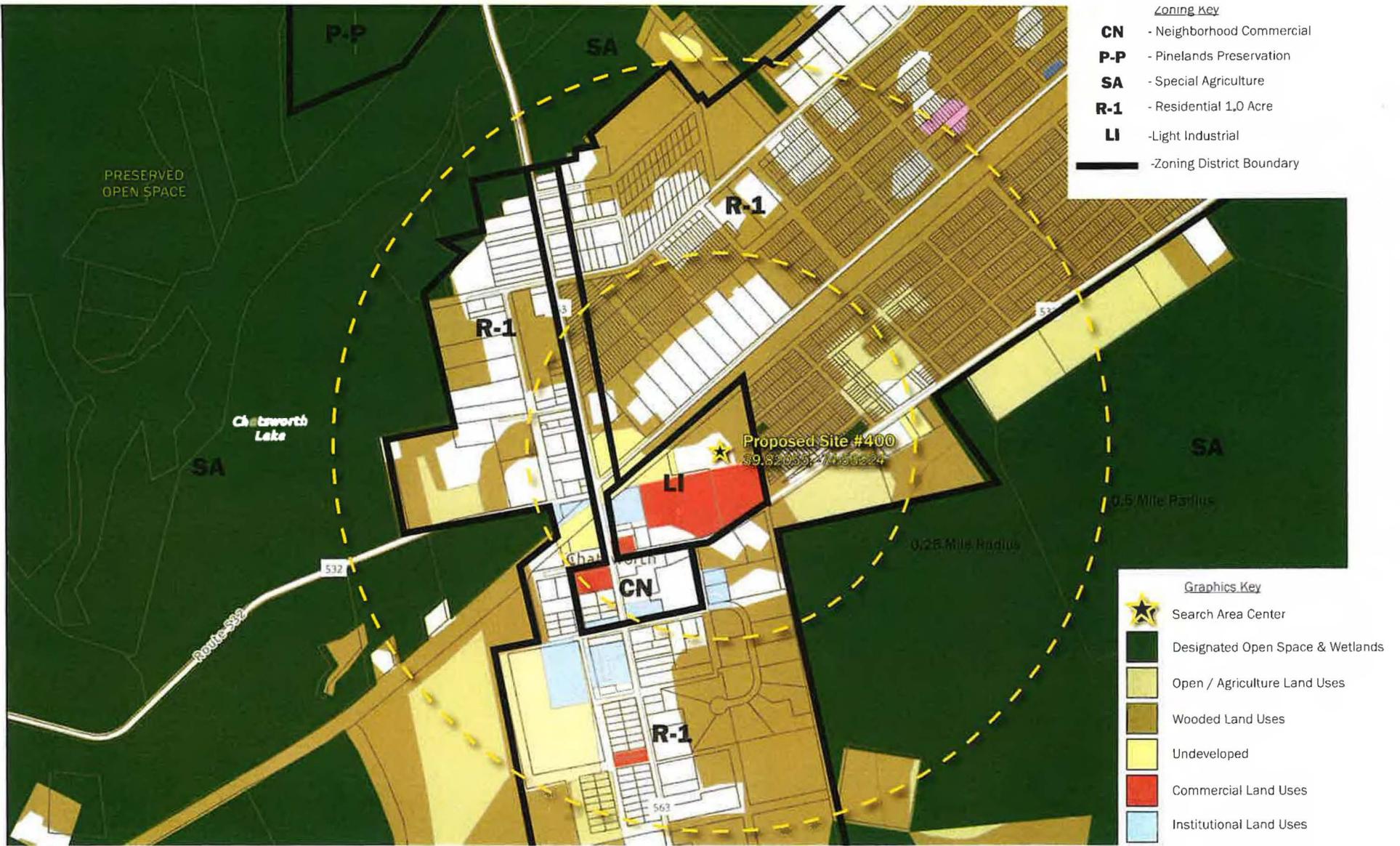


- Graphics Key
- Search Area Center
 - Designated Open Space & Wetlands



Map D - Proposed Site 400/ Chatsworth Village Zoning - 1 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 30



- Zoning Key**
- CN** - Neighborhood Commercial
 - P-P** - Pinelands Preservation
 - SA** - Special Agriculture
 - R-1** - Residential 1.0 Acre
 - LI** - Light Industrial
 - - Zoning District Boundary

- Graphics Key**
- Search Area Center
 - Designated Open Space & Wetlands
 - Open / Agriculture Land Uses
 - Wooded Land Uses
 - Undeveloped
 - Commercial Land Uses
 - Institutional Land Uses
 - Industrial Land Uses
 - Residential Land Uses



Map E - Proposed Site 400/ Chatsworth Village Zoning & Land Use - 0.5 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 3E



Map F - Proposed Site 400/ Chatsworth Village Zoning & Aerial - 0.25 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025



Photographic Inventory & Simulations

Proposed AT&T Site 400 / 39.82055, -74.53224
160-foot Monopole - Wireless Telecommunication Facility

1555 Chatsworth Barnegat Road
Chatsworth, NJ 08019
Woodland Township, Burlington County

September 25, 2025

Prepared For:



Prepared By:





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Photographic Key Map - Proposed ATT Site 400



Yellow Arrows
Anticipated Visibility



Blue Arrows
Obscured Visibility

White Arrows
Not Visible

tabbles®

EXHIBIT

4/A





View # 1 - From Main Street & Peacock Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT
tabbles®
4B

Not Visible





View # 2 - From Savoy Boulevard (Viewing East)



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

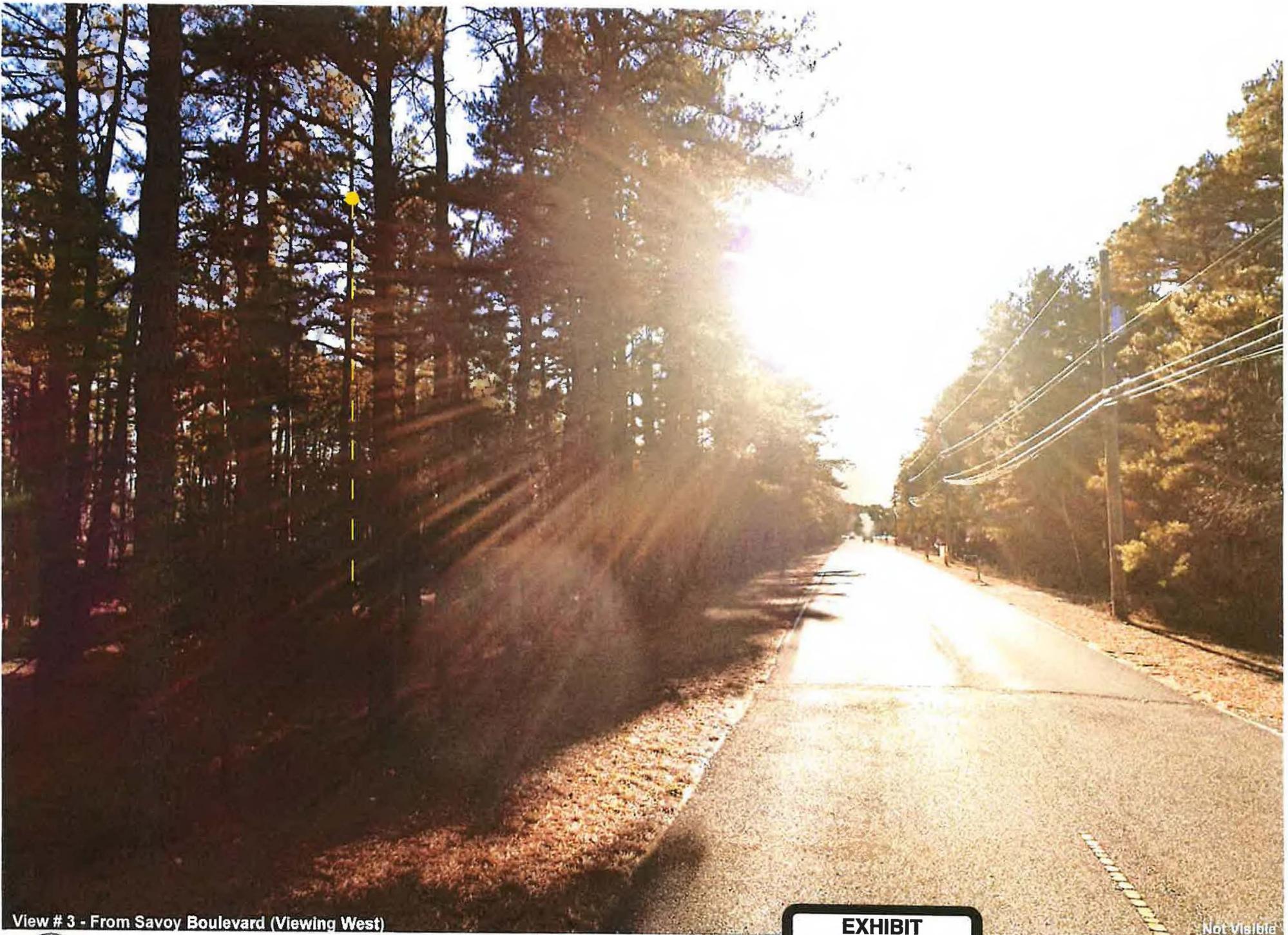
tabbles[®]

EXHIBIT

4/C

Not Visible





View # 3 - From Savoy Boulevard (Viewing West)



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT

tabbles

40

Not Visible





View # 4 - From Chatsworth Barnegat Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles®
EXHIBIT
4E

Not Visible





View # 5 - From Chatsworth Barnegat Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles®

EXHIBIT

4F

Anticipated Visibility



seidel planning & design
land solutions



View # 6 - From Main Street & First Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT

4/G

Anticipated Visibility





View # 7 - From Tabernacle Chataworth Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles[®] EXHIBIT
4H

Anticipated Visibility

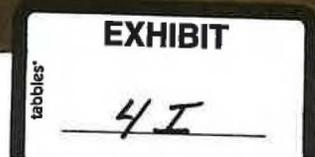




View # 8 - From Main Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025



Obscured Visibility





View # 9 - From Tabernacle Chatsworth Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT

tabbles®

4 J

Anticipated Visibility





From: Kafka, John <jkafka@co.burlington.nj.us>
Sent: Thursday, August 10, 2023 11:51 AM
To: Bert Stern <bstern@towernorth.com>
Cc: Lash, Christopher <Christopher.Lash@jacobs.com>; Gubbei, Gary <ggubbei@co.burlington.nj.us>
Subject: RE: Communications Tower on Canal Street / Woodland Township

All concerned,

The Burlington County radio tower on Canal St in the Chatsworth section of Woodland Twp, NJ is a single antenna structure used to support multiple antennas operated by different carriers. The following is currently co-located on this tower:
700 MHz National Interoperability 7 TAC channels 52, 54 and 76.
Burlington County Public Safety (BCPS) 700 MHz P25 trunked system.
BCPS VHF 4 Channel PSSN simulcast system.
BCPS VHF Fire paging.
BCPS Office of Emergency Management ARES/RACES.
New Jersey State Police P25 trunked system.
New Jersey Forest Fire VHF
State of NJ Interoperability
WBZC FM Broadcast
Unfortunately, the tower is currently maxed out and we have no room to co-locate any other carriers.

Respectfully,

John Kafka

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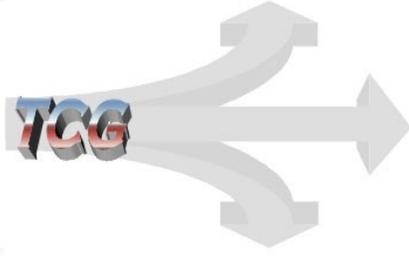
Appendix D - Hierarchical Policy for Locating Individual Wireless Facilities

The Plan also references a one-half mile radius around every proposed facility's approximate location. To properly apply the CMP's standards within the context of this Plan, if approved, the following procedure (adopted by the Commission on September 11, 1998) will be used when the companies seek to finalize these approximate locations.

1. Except as otherwise specifically noted in this report, there will be a general presumption that a facility's final location will be within the immediate area of the location proposed in this Plan, i.e., the Pinelands management area group and municipality described in the Plan as further defined using the geographic coordinates prepared by the Commission's staff. If it proves to be infeasible to site the facility on an existing, suitable structure (i.e., one that does not require a change in mass or height which significantly alters its appearance), the use of other existing structures or, as appropriate, eligible sites which meet the standards in N.J.A.C. 7:50-5.4(c)4 will be considered. The company's feasibility assessment will need to include confirmation from other parties to this Plan who are slated to share the facility that the selected site meets their needs.
2. If siting of the facility within the immediate area of the Plan location is infeasible, the company will broaden its search area consistent with the service need for the facility and in conformity with other appropriate technical considerations, but in no case will that area extend beyond a half-mile radius. This will require consultation with other parties to this Plan who are slated to share the facility to ensure that any new location meets their needs.
3. Within that broader search area, consideration will first be given to locating the needed antenna on an existing, suitable structure if that structure does not require a change in mass or height that significantly alters its appearance.
4. Failing that, the use of other existing structures that may require a significant change in mass or height (if appropriate in view of the CMP's standards, including those related to visual impacts) or sites for a new structure within the search area will be evaluated. Only those structures or sites which meet the requirements of N.J.A.C. 7:50-5.4(c)4. and other applicable CMP standards will be selected. If that broader search area crosses the boundaries of the Pinelands Area or its management areas, the company will seek to site the facility in the following order of preference:
 - a. Outside the Pinelands;
 - b. Pinelands Regional Growth Areas, Pinelands Towns and the developed portions of Military and Federal Installation Areas;
 - c. Pinelands Rural Development Areas, Agricultural Production Areas, undeveloped portions of Military and Federal Installation Areas and Pinelands Villages other than those expressly identified in N.J.A.C. 7:50-5.4(c)6; and

d. Pinelands Preservation Area District, Special Agricultural Production Areas, Forest Areas and the Pinelands Villages expressly identified in N.J.A.C. 7:50-5.4(c)6.

5. If no feasible structures or sites are found, the company should reexamine the surrounding facility network and propose an amendment to this Plan which conforms to CMP standards. Of course, the company retains its right to seek a waiver of strict compliance from the standards of the CMP, although the Executive Director notes that the tests will be difficult to meet.



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Review of
New Cingular Wireless PCS LLC D/B/A AT&T
First Amendment
to the 2003 AT&T Plan

presented to the
New Jersey Pinelands Commission
November 26, 2025

Prepared by
Bruce Eisenstein, Ph.D., P.E.

December 22, 2025

A handwritten signature in blue ink that reads 'Bruce A. Eisenstein'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce A. Eisenstein, Ph.D., P.E.

Introduction

In preparation for this report, we reviewed the following Federal Document:

***** The FCC Telecommunications Act of 1996**

We read and reviewed the package submitted on November 26, 2025 by Warren. O. Stillwell, Esq. Attorney for AT&T:

Application of New Cingular Wireless PCS LLC d/b/a AT&T fir First Amendment To the 2003 AT&T Plan

In addition , we reviewed the following Web Sites referenced in the 12/8/2025 email from Brad Lanute [PINELANDS]:

State of New Jersey Pinelands Commission:

- (1) **Planning for Wireless Communications Facilities
(specifically the 2003 Appendix B (Technical Consultants Review): At&T Siting Plan Amendment)**
<https://www.nj.gov/pinelands/landuse/current/wireless/>
- (2) **The Comprehensive Management Plan**
<https://www.nj.gov/pinelands/cmp/>
- (3) **Pinelands Property Maps**
<https://www.nj.gov/pinelands/home/maps/interactivemap/>
- (4) **Pinelands Property Map (Chatsworth area)**
<https://www.nj.gov/pinelands/home/maps/maps/documents/archD.pdf>
- (5) **Data**
<https://www.nj.gov/pinelands/home/maps/datas/index.shtml>

Background

Cellular communication is enabled by allowing a handheld or mobile unit to communicate with an antenna site located near the base station at the center of a cell. Both the handheld and the base station must put out sufficient power so that they can “hear” each other. The handheld units are mobile, frequently in cars, and as the handheld crosses from one cell to another there must be a “handoff” or the call will be dropped creating an interruption in service. Consequently, sufficient power must be available traversing from cell to cell.

However, cell towers cannot emit too much power since the aim is to confine the signal to the rough borders of the cell. Consequently, the emissions from cell towers are generally low power and since the power from the cell tower degrades exponentially with distance from the tower site, the level of exposure for people on the ground is safe if the site is in full compliance with FCC standards. For that reason, when a cell site is to be constructed, it is required to produce a compliance report to show that the standards of the FCC have been met.

In addition, for the information of the Commission, propagation plots are required to show that the site is necessary and appropriate to satisfy the design standards of the applicant.

Analysis

The applicant is requesting a modification to their 2003 Siting Plan Amendment (Web Site 1 from above). This is to improve the AT&T coverage in the area of Chatsworth Village for both wireless users and First Responders under the Federal FirstNet Authority for which AT&T was awarded a contract to “build and manage the National Public Safety Broadcast Network. The Exhibits 2A through 2F provided by DBM Engineering P. C. in the application package serve to demonstrate justification of the proposal to add Site 400 in Chatsworth and eliminate the need for AT&T to use the prior approved Site 41 to the AT&T Comprehensive Plan for the State of New Jersey Pinelands.

Exhibit 2A “Existing AT&T Reliable Coverage” is a propagation plot showing wireless coverage at a power level of -95 dBm¹ around the area of Chatsworth Village. It shows that the Village has very little reliable coverage at present.

Exhibit 2B “AT&T Proposed Reliable Coverage” is a propagation plot including the proposed antenna site 400 showing wireless coverage at a power level of -95 dBm including the entire area of Chatsworth village.

Exhibit 2C “AT&T Reliable Coverage with Original Site #41” is a propagation plot not

¹ It should be noted that this power level is reasonable for design purposes and comports with numbers we have seen in other locations.

including the proposed antenna site 400 but with the prior approved Site #41 showing no improvement in wireless coverage for Chatsworth Village at a power level of -95 dBm.

Exhibit 2D “AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with the adjacent NJL03311 (called “Chatsworth”) raised to 219’ AGL and showing minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Exhibit 2E AT&T Reliable Redundant Coverage with “Chatsworth” and adjacent site on-air and both raised to 219’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with both the adjacent NJL03311 (called “Chatsworth”) and the site to the left of NJL03311 on the map raised to 219’ AGL and still showing minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Exhibit 2F “AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL and “Site 062” at 200’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with both the adjacent NJL03311 (called “Chatsworth”) site at 219’ AGL and the prior approved but unbuilt Site 062 if on air would again provide only minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Conclusions

We agree that removing Site 41 from the Comprehensive Plan and replacing it with the Proposed Site 400 in Chatsworth Village would meet the requirements of reliable coverage at -95dBm in Chatsworth Village and the surrounding area. In addition, the requirement for AT&T to provide FirstNet service to First Responders in the area will be met.

The proposed Site 400 is to be located “in or near a Pinelands Village (Chatsworth)” but the actual site has not been specifically identified. When and if that happens, the applicant will be required to “demonstrate satisfaction” with the Pinelands regulations at the time that an application is made for Pinelands approval of a specific site. In addition, zoning and RF safety requirements will have to be demonstrated by application to the appropriate municipal entity.