



## State of New Jersey

THE PINELANDS COMMISSION

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NEW LISBON, NJ 08064

(609) 894-7300

[www.nj.gov/pinelands](http://www.nj.gov/pinelands)



MIKIE SHERRILL  
Governor

DR. DALE G. CALDWELL  
Lt. Governor

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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: January 21, 2026

Subject: January 30, 2026 Committee Meeting

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Enclosed please find the agenda for the Committee's upcoming meeting on Friday, January 30, 2026. The packets also include the following items:

- Minutes from the Committee's November 21, 2025 meeting
- Correspondence received on the topic of artificial turf submitted after the meeting

Please note that the minutes offer links to the presentations given at the November meeting. Due to the size of the files, copies of the presentation are not attached to the emailed packets to prevent transmission problems. The presentations are available through the links in the minutes.

After the November meeting, two members of the public sent written comments on the subject of artificial turf. Copies are attached for information purposes only. As the individuals did not comment or submit the written comments during the meeting, the submitted correspondence is not part of the minutes.

At the January Committee meeting, there will be a presentation on new public notice requirements enacted by public law, P.L. 2025, c.72. A link to the legislation is provided here: [P.L.2025, c.72](#)

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](http://www.youtube.com/c/PinelandsCommission)



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## CMP POLICY & IMPLEMENTATION COMMITTEE MEETING

January 30, 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](https://www.youtube.com/c/PinelandsCommission)

To Provide Public Comment, Please Dial: 1-929-205-6099 Meeting ID: **831 9186 1077**

### Agenda

1. Call to Order
2. Adoption of minutes from the November 21, 2025 CMP Policy & Implementation Committee Meeting
3. Update on Jackson Township's Affordable Housing Plan
4. Overview of Public Notice Amendments
5. 2025 Year-end Conformance Summary Presentation
6. Public Comment
7. 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](http://www.youtube.com/c/PinelandsCommission)

Richard J. Sullivan Center  
15C Springfield Rd  
New Lisbon, New Jersey 08064  
**November 21, 2025 – 9:30 a.m.**

### **MINUTES**

**Members in Attendance:** Alan W. Avery, Jr., Deborah Buzby-Cope, Jerome H. Irick, Chair  
Laura E. Matos, Jessica Rittler Sanchez

**Members in Attendance (Zoom):** Mark S. Lohbauer, Douglas Wallner

**Members Absent:** Theresa Lettman

**Staff Present:** Gina Berg, John Bunnell, Ernest Deman, Katie Elliott, April Field, Lori Friddell,  
Susan R. Grogan, Brad Lanute, Paul Leakan, Amber Mallm, Claire Osei, Stacey P. Roth

**Also in attendance (Zoom):** Michael Eleneski with the Governor’s Authorities Unit, Cecile  
Murphy, New Jersey Department of Environmental Protection (NJDEP), Lori A. Lester, NJDEP,  
Nick Procopio, NJDEP, Greg Raspanti, NJDEP, Martha Sapp, NJDEP

#### **1. Call to Order**

Chair Matos called the meeting to order at 9:32 a.m.

#### **2. Adoption of minutes from the Open Session October 31, 2025 CMP Policy & Implementation Committee Meeting**

Commissioner Irick moved the adoption of the Open Session of the October 31, 2025 meeting minutes. Commissioner Rittler Sanchez seconded the motion. All Ayes. The motion passed.

#### **Adoption of minutes from the Closed Session October 31, 2025 CMP Policy & Implementation Committee Meeting**

Commissioner Buzby-Cope moved the adoption of the Closed Session of the October 31, 2025 meeting minutes. Commissioner Lohbauer seconded the motion. Commissioners Buzby-Cope, Irick, Lohbauer, Matos, Rittler Sanchez and Wallner voted in favor. Commissioner Avery abstained. The motion passed.

### **3. NJDEP Artificial Turf Presentations**

*Attachment A to these minutes and posted on the Commission's website at the following address:*  
<https://www.nj.gov/pinelands/home/presentations/ST%20Presentation%20for%20Pinelands.pdf>

Director of Land Use Programs Gina Berg said that in response to the Commissioners' expressed interest in the impact of use of artificial turf within the Pinelands, staff contacted the NJDEP to provide information on two program areas related to synthetic turf use.

#### Green Acres Review of Recreation Project Proposals

Cecile Murphy of the NJDEP Green Acres program presented a review of the Green Acres Local and Nonprofit Assistance Program for synthetic turf funding and their associated policy and application requirements.

Ms. Murphy reviewed the Green Acres funding program types, including land acquisition, park development and the new initiative of stewardship projects. She said all synthetic turf projects are funded through the park development program. She described eligible projects as those for outdoor recreation and conservation purposes with limited development in rural areas.

Ms. Murphy said Green Acres has been funding synthetic turf projects for 20 years, with the focus on the primary benefit of additional playing time and the associated positive impact of increased recreational opportunities on public health. She acknowledged that the topic of the benefit of less maintenance for synthetic turf hasn't been fully discussed.

She said, because of a recent pilot program, Green Acres has received more applications for inclusive playgrounds that are choosing artificial turf to meet requirements for unitary surfacing.

Ms. Murphy reviewed concerns raised about the use of artificial turf. She said Green Acres relies on the NJDEP Division of Science and Research for guidance. She said recent concerns have been numerous and varied. As a result, the Division of Science and Research completed a comprehensive review of scientific research that focused on seven areas of concern, including the potential health risks from user exposure, stormwater runoff, heat exposure risk, the urban heat island impact, user injury risks, microplastic migration, and the environmental impact of turf disposal at end of its useful life.

She said Green Acres has additional concerns outside of that science, including costs, field usage, and useful life. She remarked on the higher costs of construction and disposal. Ms. Murphy explained that funding approval requires that the field must be open for use by the public for a portion of time; the field cannot be used only for practice or play of a school team, for example. She noted that public access to fields is sometimes limited as a result of the need to protect artificial turf fields from damage. She said there is concern with funding projects with a shorter useful life, noting that the average life of synthetic turf is 8 to 10 years.

Ms. Murphy said the NJDEP considers environmental justice and needs to balance the potential for negative environmental impacts against the primary benefit of additional playing time. She said natural turf fields require resting periods to maintain good condition but that demand for field time in an urban environment can limit turf resting periods, and that makes natural turf a

poor choice in a high-use field.

She explained that these topics are all considered and used when ranking projects. Ms. Murphy said a project usually ranks highest when there is significant community support.

Ms. Murphy reviewed requirements for applicants for artificial turf projects. She said Green Acres prefers natural grass but does acknowledge the recreational benefits of artificial turf. She said applicants are required to conduct due diligence to address specific questions on material type, stormwater management, maintenance, backing, infill material, shading and recycling. She said this allows the applicant to become aware of associated risks and to make an informed decision. Ms. Murphy emphasized that applicants are required to be transparent throughout the process with public engagement during the project planning period. She said all synthetic turf projects must comply with stormwater management rules.

Ms. Murphy reviewed 2026 funding round application requirements that include long-term cost analysis and alternatives analysis. She said applicants must identify their source and plan for field replacement funding. She said the NJDEP will not fund the same project within a 20-year span and therefore projects will not be eligible for funding of replacement turf at the end of an 8- or 10-year synthetic turf lifespan. She added that the Green Acres will provide funding to convert artificial turf fields to natural grass.

Chair Matos opened the floor to questions.

Commissioner Wallner inquired on the cost analysis and what type of strategies applicants are using to meet replacement costs. Ms. Murphy said replacement costs most likely come from the applicant's capital budget. She said the Department of Community Affairs (DCA) offers some grants for local government.

Commissioner Rittler Sanchez inquired about how Green Acres evaluates projects in urban, suburban or environmentally sensitive state planning areas. Ms. Murphy said all applicants are required to have an environmental impact statement that must address both the construction phase and long-term impacts. She said the needs of a community are looked at on a case-by-case basis depending on unique community characteristics.

Commissioner Avery inquired if the Green Acres Program funds school projects. Ms. Murphy said there is a limited number of Board of Education projects, and Green Acres has recently narrowed their funding eligibility qualifications further. She explained that a project cannot be exclusively used by the school, must be in a high population area without public park options, and offer public use of the field outside of school instruction hours.

Commissioner Avery inquired about school funding for athletic fields. Ms. Murphy said Green Acres funding is only available to local government or eligible non-profits. She said there are other State sources to fund school athletic fields.

Commissioner Avery questioned if school athletic funding has the same review process as Green Acres. Ms. Murphy said all state projects over one million dollars must have an environmental

assessment before funding.

Commissioner Lohbauer said he is glad that Green Acres has an extensive application process. He inquired about the disposal and recycling of artificial turf fields after their short useful life. Ms. Murphy said the application makes clear that these are not long-term facilities and addresses disposal in the synthetic turf addendum to the environmental impact statement. She said questions on artificial turf disposal should be referred to the Division of Solid Waste.

Commissioner Irick inquired about follow-up after projects are funded to verify mitigation strategies are installed. Ms. Murphy responded that the applicant must demonstrate what mitigation strategies they plan to use. She said if funded, Green Acres reviews the construction plans for consistency with the application and completes a final site inspection, along with compliance inspections every three years. She said they do not conduct site monitoring for field maintenance.

Commissioner Irick said the maintenance and disposal is not monitored closely. He expressed concern with the recycling of used artificial turf. He inquired why projects are funded when there are so many negative criteria. Ms. Murphy said it is a complex issue with an evolving policy.

#### Division of Science and Research Summary of Current Science

*Attachment B to these minutes and posted on the Commission's website at the following address:*

<https://www.nj.gov/pinelands/home/presentations/Synthetic%20Turf%20Presentation%20Pinelands%20Comm%2021Nov2025%20v1%20GR.pdf>

Dr. Greg Raspanti from the NJDEP Division of Science and Research provided a review of the current published science regarding synthetic turf, including risk factors and environmental impacts. He said research was conducted at the request of the Green Acres program to investigate areas of concern relating to synthetic turf. He noted that both Dr. Lori A. Lester and Dr. Nick Procopio of the NJDEP were also present on Zoom.

Dr. Raspanti presented the generational history of synthetic turf and its material components. He said each synthetic turf system is unique with many impacting factors, such as whether it is indoor or outdoor, the type of use and activity, climate, and materials.

Regarding the potential exposure risk to harmful chemicals, he referenced the Federal Research Action Plan (FRAP) and its primary focus on recycled tire crumb rubber (RTRC). He reviewed results of bacterial testing, metals, volatile organic compounds, and PFA (perfluoroalkyl compounds) detection and human exposure (presentation attached). He said no findings exceeded NJDEP non-residential soil remediation standards.

Dr. Raspanti discussed the contribution from synthetic turf systems to stormwater runoff and flooding. He said the implementation and construction of synthetic turf must comply with NJDEP stormwater rules. He said pre-construction design and maintenance are critical to managing stormwater and to prevent materials from leaving the field surface.

Regarding the urban heat island effect, he explained that studies have found that field surface

temperatures can run as much as 59 degrees higher on synthetic turf compared to natural grass fields. He said reported findings suggest that synthetic turf does not contribute to urban heat island effects because it does not hold the heat compared to surrounding urban infrastructure.

Dr. Raspanti said studies on heat injury risk between synthetic turf and natural turf are inconclusive due to many variables. He noted that children are more susceptible to suffer heat injury regardless of playing surface. Regarding athletic injury risk, Dr. Raspanti said most of the studies address professional athletes not youth sports and are therefore not applicable to general public use. He highlighted the difficulties in comparing these studies for Green Acres purposes.

Dr. Raspanti shared research on microplastics, explaining that plastic components of synthetic turf fields are broken down into microplastics and with degradation can produce nanoplastics. He further explained how microplastics and attached chemicals can be dispersed into the environment. He suggested limiting material migration by installing collection devices and improving field maintenance.

He said a synthetic turf field has a limited useful life of 10-12 years with proper maintenance. He addressed disposal, noting that while there are new technologies for recycling some of the synthetic turf components, there are difficulties in the recycling process resulting in high costs and a lack of capable facilities.

Dr. Raspanti said that assessment comparing life cycle environmental impacts between synthetic turf and natural grass turf is inconclusive at this time due to variables in the production of material, transportation, disposal challenges, and maintenance.

Chair Matos opened the floor to questions.

Commissioner Buzby-Cope remarked on the cushion of indoor field infill and athlete injury. Dr. Raspanti said infill can be changed to accommodate certain sports or activities.

Commissioner Rittler Sanchez questioned what material is used for the subbase against the soil. Dr. Raspanti said the material used and depth of fill would vary depending on the intended field use. He said it could be plastic, concrete, compacted gravel or natural soil.

Commissioner Rittler Sanchez noted that most of the research has been on the human health criteria and inquired if any evaluation has been done on the environmental impact of microplastics to aquatic ecosystems. Dr. Raspanti said his area of focus has been on human exposure risks, but he is aware of research on ecotoxicity.

Dr. Lori Lester of NJDEP added that there is not much science available at this time to answer the question of long-term environmental impact. Commissioner Rittler Sanchez inquired if there was any plan to research it and if anyone approached the New Jersey Water Resources Research Institute at Rutgers for grant research opportunities. Dr. Raspanti said the original report summarizes what information is currently available. Dr. Lester added that additional research is on the list of future projects for consideration and that they are looking at mitigation strategies currently used in New Jersey.

Commissioner Wallner inquired if there was research on the toxicology of microplastics at the end of a field life cycle and the impact of chemical breakdown to players as the surface degrades. Dr. Raspanti said it was not evaluated in these studies, but experts have been looking at the impact of microplastics on human health. Dr. Lester said the Division of Science and Research is working on a different report on human health effects of microplastics, though not specific to synthetic turf.

Commissioner Irick inquired why nonresidential standards were used as the test criteria. Dr. Raspanti said non-residential standards were used to better reflect the exposure time and interaction with the field within the exposure time. Commissioner Irick confirmed that the residential standards are more stringent.

Commissioner Irick inquired what effect the increased daytime field temperature has on children's injury. Dr. Raspanti said that pre-existing conditions or illness impact the heat injury risk and that heat mitigation strategies such as shading, increased rest time and hydration should be applied. Commissioner Irick suggested advising turf users, especially for children, of increased field temperature risks. Dr. Raspanti agreed it should be communicated.

Commissioner Irick suggested that as the synthetic turf deteriorates there would be an increase in fiber dispersal into the environment. He said environmental impacts from artificial turf removal and disposal should be evaluated, and he asked if the Division of Solid Waste was working on best practices.

Commissioner Rittler Sanchez inquired if field studies compared varying ages of turf. Dr. Raspanti said the comparisons did include both newer and older fields. He said newer installations had higher levels of environmental chemicals and as the field aged those chemicals dropped off due to degradation. Commissioner Rittler Sanchez asked if it could be assumed that constituents migrate off-site. Dr. Raspanti responded that they are either environmentally degraded or migrated elsewhere.

Commissioner Rittler Sanchez inquired if new policies and precautionary principles to prevent potential harm to children and the environment were being created while research and evaluation were conducted. Ms. Murphy said the Green Acres Program, when considering projects for funding, tries to balance the risk of potential harm with the project's public benefits. Commissioner Rittler Sanchez acknowledged the work of Green Acres in promoting environmental justice and their consideration of the urban heat island effect.

Commissioner Lohbauer remarked that Pennsylvania and Maryland are developing special disposal standards for used artificial turf in response to illegal storage and disposal. He said that the NJDEP should focus its ecotoxicity analysis on water, particularly in the Pinelands with its unique environment. Commissioner Lohbauer questioned whether toxicity tests consider cumulative results from long-term exposure. Dr. Raspanti said existing New Jersey soil remediation standards for toxicity levels were applied to available data for this report and that enlisting participants for a study of long-term exposure may be difficult. Commissioner Lohbauer said long term study might result in concern with repeated exposure.

Commissioner Lohbauer remarked that impact to the environment, as well as disposal costs should be factored in determining the cost effectiveness of recycled tire crumb rubber. He also requested clarification on reference to some leaching of PFAs. Dr. Raspanti said there is not sufficient science published to include a definitive statement regarding PFAs leaching from turf environments into an aquatic environment.

Commissioner Buzby-Cope inquired if Green Acres funded or worked with businesses that collect and recycle tires for crumb rubber use. Ms. Murphy said Green Acres does not fund businesses, only local governments and non-profit.

Commissioner Irick asked to clarify how long residual bacteria and MRSA last on artificial turf. Dr. Raspanti said bacteria, staph and MRSA can last hours dependent on whether the field is indoor or outdoor and if treated with antimicrobial agents.

Chair Matos thanked all presenters and participants.

#### **4. Discussion of Accessible Trail Standards**

*Attachment C to these minutes and posted on the Commission's website at the following address:*  
<https://www.nj.gov/pinelands/home/presentations/Accessible%20Trail%20Standards%20PI%20Nov%202025.pdf>

Planning Specialist Katie Elliott presented a summary of issues related to setting new Pinelands Comprehensive Management Plan (CMP) standards for the development of accessible trails in wetlands and wetland buffers. The Committee considered the current standards and potential amendments.

Ms. Elliott explained that the Commission had received three proposals to improve accessibility to existing trails, noting that none of the proposals met the current CMP minimum environmental standards, thus requiring the applicants complete the intensive Memoranda of Agreement (MOA) process to deviate from CMP standards. She said that the Commission and staff recognize the goal of providing more equitable access to Pinelands recreational resources and are therefore considering CMP amendments to allow applications involving accessible trails to follow the normal application process without requiring a deviation MOA.

She reviewed details of both the recent Pemberton Lake and Stafford Forecastle Lake accessible trail projects, both of which successfully completed the MOA process.

Ms. Elliott summarized accessible trail presentations and discussion from the Commission's 2025 Permanent Land Preservation (PLP) summit. She reviewed participant feedback from the roundtable discussion on trail materials and construction, impacts on natural resources, and accessibility documentation. She said staff researched information from other agencies on definitions, guidelines and design standards to find a suitable intersection of accessibility and environmental protection.

Ms. Elliott reviewed current standards in the CMP for low intensity recreational trails in

wetlands and wetlands buffers, noting that the CMP does not allow fill, grading or paving. She said boardwalks are allowed in the wetlands to help reduce negative impacts from trails. She reviewed current CMP standards that set additional limitations within certain management areas for low intensity recreation uses.

She said the suggested amendments would only apply to accessible trails in wetlands and wetland buffers and would be limited to trail projects, not amenities. Ms. Elliott explained that stormwater management would not be required if the improved trail is within an existing trail footprint. She said the focus is on the accessibility conversion of existing unimproved trails within wetlands and wetlands buffers, not in creating new trails.

Ms. Elliott outlined the three main points of a potential rule amendment. She reviewed new definitions to be added in the amendment. She identified provisions for limits to trail width and length, as well as the requirement that the trail be constructed of boardwalk material within wetlands. She restated that while trail improvements on existing unimproved trails would be exempt from stormwater management they would still be required to address threatened and endangered (T&E) species requirements.

Ms. Elliott noted that both the Pemberton Lake and Stafford Lake projects would have met these suggested standards without the need for an MOA.

Ms. Elliott highlighted issues for Committee discussion, starting with trail width. She said staff has discussed allowing 4 to 5 feet widths with widened areas for passing at intervals along the trail or allowing 6 feet widths to permit trail users to pass side-by-side throughout the trail.

Executive Director (ED) Grogan said the intent of the amendment is to allow access, so the standard should not be too restrictive. She added that at the same time the improved trail should not result in a large impact on wetlands.

The Committee discussed the suggested widths, use of bump-outs and safety considerations.

Commissioner Irick suggested a 4 feet width with a bump-out. Chair Matos agreed.

Commissioner Wallner referenced preexisting trails at the Black Run in Evesham Township as older roads that may already exceed 6 feet. Ms. Berg said the suggested definition of an unimproved trail would apply and explained the implementation of improvements on wider preexisting trails. She added that some entities expressed interest in having wider trails for multi-modal use, not purely for accessibility. Commissioner Wallner said that the wider trails while accessible can allow for other uses, such as bicycles.

Chair Matos said that if too wide, improved trails could invite misuse by motor vehicles and other vehicles that would have unintended negative impacts.

ED Grogan said these standards would apply to existing trails in wetlands and wetlands buffers; applications for development of wider trails could be pursued in upland areas. Ms. Grogan said the standards are meant to be limited to prevent too much development in wetlands and buffers.

Commissioner Buzby-Cope inquired regarding Americans with Disabilities Act (ADA) compliance.

Ms. Berg said the Forest Service standards used in preparing the Stafford and Pemberton trail MOAs considered ADA compliance.

Chief of Legal and Legislative Affairs Stacey Roth said ADA compliance does not supersede environmental regulations. She said ADA compliance work should be completed in harmony with the environment and that Forest Service guidance states that if ADA compliance is not feasible because of environmental constraints, then ADA compliance is not necessarily required.

ED Grogan said that the draft of new standards is trying to achieve a clearer process.

Commissioner Avery suggested that before defining trail width, staff should reach out to advocacy groups to obtain ideal maximum widths for mobility. Ms. Berg said that accessibility advocates made presentations and participated in roundtable discussions on trail construction at the PLP summit in March.

ED Grogan said these are draft standards for discussion and input and will be further researched and discussed before final recommendations are made.

Ms. Elliott presented the next topic for discussion as the distance a boardwalk extends beyond a delineated wetland. She said there are site specific considerations to dictate distance. She added that there is no data available on environmental impacts of different boardwalk extension distances. She noted the expense to the applicant for larger distances versus the impacts from possible paving closer to wetlands when boardwalks extend for shorter distances beyond the wetlands.

Commissioner Lohbauer questioned if this issue should be left to each individual case, allowing the Commission to require greater length of boardwalk leading away from the wetland provided it was deemed necessary to prevent leaching from a paved surface. Ms. Berg said that a subjective standard is difficult for staff and applicants to implement.

Commissioner Wallner referenced the Black Run and Evesham Township's proposed MOA, which would allow for an improved accessible trail almost entirely in wetlands. He said it is hard to imagine the proposed trail being entirely boardwalk. Ms. Berg said boardwalk installation is required to protect wetlands but there is some leeway in determining how far to allow the boardwalks to extend into wetlands transition areas.

ED Grogan noted that these proposed rules would not facilitate what is being proposed in the Black Run. She reiterated that the proposed standards are meant for smaller, existing, unimproved trails and not meant to address extensive areas like the Black Run Preserve. She said the MOA process will remain necessary for certain circumstances.

Commissioner Rittler Sanchez asked if boardwalk should be required in any floodplain. Ms.

Berg said that the CMP does not have a definition of floodplain and using the floodplain to require boardwalk may have other implications to consider.

Ms. Elliott presented trail material outside of wetlands as a third issue for discussion. She said staff suggested that there would be no restriction on trail material outside wetlands which would allow paving in wetlands buffers.

ED Grogan said there are varying trail material options that could be proposed by applicants. Applicants would not necessarily choose paving, but they could if the suggested amendments were adopted. She questioned if the CMP should require demonstrations or analysis of the best surface to use. Ms. Grogan said allowing a limited amount of paving offered a conservative approach without subjective analysis.

Commissioner Rittler Sanchez inquired on appropriateness of semi-pervious material for wetland buffers. Ms. Berg responded that if the CMP allowed pavement in wetlands buffers, it would not require paving. This would allow the applicant to propose any range of permeability based on their accessible trail goals and allowed mobility devices.

Commissioner Rittler Sanchez suggested a tiered approach with the preferred choice being a semi-pervious surface and requiring the applicant show reason for using other material. ED Grogan said the tiered approach was considered but that developing and implementing standards with a matrix of options is complicated. Commissioner Rittler Sanchez added that the applicant may choose paving as a cheaper option to more environmental alternatives.

Chair Matos said keeping with the goal of accessibility, these standards are small in scope and apply only to wetlands and wetlands buffers. She supported allowing surface materials up to and including paving.

Commissioner Irick opposed using asphalt paving and suggested offering several alternatives for applicants to choose from.

The discussion continued on asphalt allowance. ED Grogan confirmed that Commissioner Irick prefers rules not allowing asphalt in wetlands buffers but supports allowing applicants to choose what pervious material is used.

Chief Permit Administrator April Field commented that certain materials in high traffic areas can ultimately become impervious surfaces as they become compacted over time.

Ms. Elliott next presented application fees for Committee discussion. She reviewed the current application fee system and questioned if a new system should be used for accessible trail fees.

Commissioner Lohbauer inquired how these applications impact workload. ED Grogan responded that normal development application processes have less impact to staff workload than if an MOA is necessary and noted that there is no application fee for the MOA process before an application is submitted.

Ms. Field said the linear development applications currently have the lowest application fee. She further remarked that most of these applications would be public development applications, which pay half the regular fee and are subject to a cap.

Commissioner Lohbauer encouraged having the lowest fee possible, provided it covers staff costs.

Ms. Elliott reviewed the preliminary timeline for preparing the rule amendment.

Commissioner Lohbauer inquired if the proposed definition of a mobility device applies only to motorized devices. Ms. Elliott said the definition of a mobility device includes non-motorized devices.

## **5. Public Comment**

Commenter #1 - Allen Carter said he is a local sod farmer in the Pinelands and was pleased to hear discussion on the concerns of artificial turf. He said natural grass has progressed with new turf grass varieties. He said research and improvements have been made resulting in a reduction in herbicide and fertilizer impacts. He said he promotes natural grass turf.

Commenter #2 - Jean Lehmborg spoke against the use of artificial turf. She identified chemicals and plastics within the multiple turf layers and the harmful breakdown of those materials into the environment. She remarked on chemical additives to liquid plastics and PFAS. She said the manufacturing process requires use of non-renewable fossil fuel and compared the amount of plastics used in creating a turf field to the volume of other plastic substances such as plastic bags. She emphasized that plastic does not breakdown but becomes microplastic pollution. She said artificial turf is a poor choice, especially in New Jersey.

Commenter #3 - Heidi Yeh representing the Pinelands Alliance expressed concern with the migration of microplastics from artificial turf. She said studies have shown the impact of microplastics on the marine environment and resulted in profound changes to that environment. She addressed field usage comparisons between artificial turf and natural grass noting that enhanced drainage improvement options for natural grass fields that are often less expensive than artificial turf and conserve water. She said research on the environmental impact of artificial turf is lacking. She said when discussing artificial turf within the Pinelands, consideration should be given to the increased fire risk and the sandy soil, which changes the mobility of heavy metals, as well as microplastic risks to the water resource. She said the Commission should ban artificial turf because the risks are too great.

Commenter #4 - Jason Howell of the Pinelands Alliance said when artificial turf is removed or disposed of at its end of life, it is often resold and repurposed in backyards and playgrounds. He said the product is continuing to spread through communities and is detrimental to waterways in the Pinelands. On the topic of accessible trail width, he suggested a 6-foot width in consideration of side-by-side access. He remarked that off-road vehicles can cause damage to accessible trails. He thanked the Commissioners and staff for their work and conversation on the topic.

Commenter #5 - Taylor McFarland, the Conservation Program Manager of the Sierra Club,

thanked the Commission for having artificial turf presentations on the agenda. She said the Sierra Club is against the use of artificial turf, advocates for natural grass alternatives, and has published a policy on the topic. She raised policy questions around the use of artificial turf. Ms. McFarland suggested amending the CMP to include policies for artificial turf-related development or creating a moratorium on its use in the Pinelands until a more comprehensive study is completed. She thanked the Commission for bringing the subject forward and offered Sierra Club resources and studies.

Commenter #6 - Frank Lehmborg discussed concerns about microplastics from artificial turf surfaces, about the impact of artificial turf on climate change, and about turf disposal through incineration. He urged the Commission to prevent the construction of any new artificial turf fields and thanked them for discussion of the topic.

Commenter #7 - Carlton Montgomery of the Pinelands Alliance said the NJDEP presentations showed the gaps in environmental impact data on artificial turf. Regarding accessible trails, Mr. Montgomery said he believes 4-foot trails are too narrow. He said consideration should be given to rest areas, scenic locations and transition areas from parking lots to trails. Mr. Montgomery commented on draft rules for GAP applications that were discussed at the October P&I meeting and said the Pinelands Alliance will make suggestions about inconsistent roles of the Pinelands Commission in private versus public development and the need to more carefully define the term public hearing.

Chair Matos closed Public Comment and opened the floor to Commissioner comments.

Commissioner Lohbauer thanked the Chair Matos and Executive Director Grogan for arranging for the NJDEP presentations and for starting discussion on the topic of artificial turf.

Commissioner Irick said he agreed that there were gaps in the science that was presented. He said he would like to take immediate steps in preventing disposal and recycling of artificial turf in the Pinelands.

## **6. Adjournment**

There being no other business, Commissioner Lohbauer moved to adjourn the meeting. Commissioner Buzby-Cope seconded the motion. All voted in favor. The meeting was adjourned at 1:04 p.m.

Certified as true and correct:



Lori Friddell  
Land Use Programs Technical Assistant

Date: December 8, 2025

**From:** Kristina Weise

**Sent:** Thursday, November 20, 2025 3:38 PM

**Subject:** [EXTERNAL] Please review: Pinelands Comprehensive Management Plan (public comment)

Dear Commissioners,

I urge the Pinelands Commission to amend the Comprehensive Management Plan to require remediation, mitigation, and oversight for any artificial turf installation, and to seriously consider a moratorium until long-term risks are fully understood.

Artificial turf brings documented concerns: PFAS, microplastics, chemical runoff, insane heat intensity, and long-term waste streams that cannot be reclaimed once released into soil and groundwater. These issues directly affect the Commission's core responsibility to protect water quality and ecological health. Turf fields are expensive and also cannot be recycled. You will be adding to the plastic pollution.

Recent events in New Jersey underscore what can happen when these concerns are not taken seriously. NJDEP recently supported a turf installation on historic, state- and nationally-registered land in Ridgewood, NJ, along Route 17, that will require removing acres of healthy trees and exposing nearby homes to increased highway pollution. Several homes in that neighborhood rely on private water wells, creating a direct pathway for chemical runoff from turf systems. This is exactly the type of high-risk scenario that demonstrates why clearer standards and safeguards are needed statewide.

**The New York Times** recently reported - [front page article](#) - on the rapid spread of artificial turf across the United States ("[Plastic Turf Fields Are Taking Over America,](#)" July 26, 2025). New Jersey's turf boom has been supported, in part, by millions in NJDEP's Green Acres funding — money originally intended to preserve natural land.

While Green Acres has publicly stated it prefers natural grass, it has also said communities should conduct "their own due diligence" about the risks. Communities cannot conduct real due diligence without consistent policy, independent science, and guardrails that prevent long-term harm. How ridiculous the public needs to educate the NJDEP of those obvious facts.

Natural grass systems cool communities, filter stormwater, and support biodiversity. Artificial turf removes those benefits and introduces new environmental liabilities. Commissioners Lohbauer and Dr. Sanchez has correctly emphasized that the CMP's mandate to protect water quality already implies responsibility for regulating materials that directly affect groundwater and soil. Strengthening policy in the CMP is a logical and necessary step.

Finally, come to a sports game where little kids are literally baking on artificial turf during the hot summer months. Temps so hot it can fry an egg due to the plastic garbage underneath them. Go see their turf burns from sliding and how painful they are to treat. And tell concerned parents, like myself, that turf is good for them.

Thank you for considering these comments and for your continued leadership in protecting New Jersey's most vulnerable ecosystems.

Best,  
Kristina Milian  
Ridgewood, NJ  
*Concerned resident*

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**From:** Aaron Golembiewski | Turf Talents  
**Sent:** Friday, November 21, 2025 10:30 AM  
**Subject:** [EXTERNAL] New options beyond plastic turf

Good morning,

I have been listening to the presentations this morning from Cecile Murphy and Greg Raspanti—they have provided a very balanced look at this challenging topic. A few years ago, as a member of a parks and rec commission in Westchester County, I was convinced by a youth soccer coach that plastic turf was the only way to keep kids playing, I want that. However, I told my internationally recognized landscape architect wife that it made sense, and she explained to me that plastic turf is the ecological equivalent of a concrete parking lot.

So I went looking for options. My search brought me to the Netherlands, where they have been working on solutions to this problem as nobody knows water and soccer quite like the Dutch. We happen to be going to Amsterdam for a landscape architecture event, so I visited some of their fields. There I saw lush and always available grass soccer fields. How do they do it? Turning fields into improved green infrastructure with the DrainTalent, a drainage and recirculation device that allows for constant access and hybrid turf, which allows a field to be 95% natural grass and 5% plastic (with a new version that is 100% plant based.)

I was hooked. We can turn these open spaces (often the largest in a community) into storm water and carbon vacuums, improving the surrounding area. They also capture heat and release oxygen. Instead of a community ecological loss, they could become community enhancements that were still are still fully available after rain storms (and even during them) for players who just want to play.

Hybrid turf is established in the U.S.—the Philadelphia Eagles (Go Birds!) play on it, as do the Green Bay Packers and the Milwaukee Brewers, along with Iowa State University. And the great news is the first DrainTalent should be going in along the Long Island Sound (an environmentally sensitive area similar to the Pinelands and Southern New Jersey) on a municipal field in the early spring. It's already in place in one 2026 FIFA World Cup stadium with at least two more to follow.

Grass can do incredible ecological work when combined with scientific enhancements; plastic can't do this work. I hope the commission considers these developing options to protect such a sensitive environment and the people who play on it.

Kind regards,

Aaron Golembiewski  
**Head of Business Development**