

March 28, 2016

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NJ Department of Environmental Protection
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Via email: david.golden@dep.nj.gov

RE: Sparta Mountain Wildlife Management Area Forest Stewardship Plan

Dear Mr. Golden,

The following organizations and individuals join with the New Jersey Highlands Coalition in expressing our deep concern about the proposed Forest Stewardship Plan (“Plan”) for the Sparta Mountain Wildlife Management Area (“SMWMA”). As it is currently written, the Plan is fundamentally flawed, and therefore we respectfully ask that you withdraw and suspend it indefinitely.

The Sparta Mountain WMA lies within one of the State’s most significant areas of mature, contiguous, and unfragmented forest. The USDA/Forest Service *New York-New Jersey Highlands Regional Study, 2002 Update*, identified Sparta Mountain as one of six “Conservation Focal Areas” in New Jersey. The SMWMA is the core of the “Sparta Mountain Greenway” in Sussex and Morris counties, which was deemed by the Highlands Coalition and Regional Plan Association a “Critical Treasure” of the Highlands region, which should remain undeveloped and be preserved for posterity. The proposed Plan embodies a radical departure from established goals of preserving the largest tracts of unfragmented forest in the Highlands, with the intent to protect water quality and supply, undisturbed habitat for interior forest species, including many neo-tropical migratory birds, and recreational, scenic and historic resources.

New Jersey’s Highlands forests have recovered from the effects of logging that supplied charcoal to the iron industry. However, in the 1990’s, these re-growing forests were massively threatened by rapid residential development. In response, both state and federal legislation were passed to protect the Highlands Region and, through the passionate dedication of the state, local governments, nonprofits and citizens, tens of thousands of acres have been acquired as preserved public lands. Sparta Mountain WMA tracts were purchased with funding from the State’s Green Acres Program, local dedicated open space taxes, federal programs, charitable foundations and private donations.

Our concerns include the following:

1. We are deeply concerned that the Plan proposes to “treat” between 275 and 715 acres during the next ten years, with practices that include Seed Tree, Shelterwood and Single Tree Selection, which all reduce or entirely remove forest canopy. We are also concerned that the Plan is envisioned as the first stage of a “larger vision” to be implemented over a period of 60 years; by that time the entire WMA would have been logged (Plan, pages 2, 69-72). Provision of habitat for early successional bird species is claimed as a major benefit; however, interior forest species are in shorter supply, far less numerous, and this Plan would destroy their habitat.
2. A fundamental flaw of the Plan is that it fails to recognize that management of our public preserved lands must be held to the highest possible standards. Any management of public lands should be exemplary, to justify the expenditure of the public monies that supported their acquisition. The Plan, however, rather than conforming to the Highlands Act, the NJDEP Highlands Rules, the Highlands Regional Master Plan goals, policies and objectives, and protective statewide NJDEP rules, instead proposes only to meet the

far less rigorous standards in the NJDEP Best Management Practices for Forestry Manual, intended for forestry on private lands.

3. The Plan fails to respond appropriately to water quality and water supply issues of critical statewide importance. The Highlands Region provides water to 332 municipalities in 16 counties, home to about 70% of New Jersey's population (New Jersey Geological and Water Survey, 2015, Open File Report 15-01). Whether or not the Plan is legally exempt from the Highlands Act, NJDEP Highlands rules and Highlands RMP is debatable; *what is not debatable is that the Act, its rules and the Highlands Regional Plan were legislated and put in place in response to the critical need to protect the water quality and supply for over two-thirds of the State.* The SMWMA comprises significant headwaters of the Rockaway River Watershed, which supplies Jersey City's Boonton Reservoir. In addition, the SMWMA supports the base flow of streams and groundwater that supplies wells within, adjacent or near SMWMA, as well as Newton's water supply reservoir. Clearly, the Division of Fish and Wildlife, as a State agency, should act in compliance with the NJDEP's rules and Highlands Regional Master Plan policies. Claiming exemption from these standards is inexcusable, possibly illegal, and a clear violation of the public trust.

Further, the Plan provides no evidence that the proposed minimum 25'-50' buffers will prevent or reduce impacts on water quality or water supply. NJDEP regulations require 150'-300' buffers for environmentally sensitive streams, open waters, wetlands and other areas. The Plan fails to demonstrate that the actions proposed will not adversely impact water quality and water supply, including, impacts on C-1 streams, which are not permitted any degradation whatsoever.

4. The Plan proposes logging at a scale and intensity that diverts SMWMA's Green Acres encumbered public lands from their public conservation and recreation purposes. The proposed Plan clearly indicates that support of commercial-scale logging is a long term expectation and objective (Plan, page 12). Green Acres encumbered public lands are subject to legal restrictions on diversion from public conservation and outdoor recreation purposes.

5. Implementation of the proposed Plan is ecologically unsound, and would cause far more harm than good to the ecosystem, its wildlife, native diversity, and natural integrity. Major problems would result from forest fragmentation, the creation of forest edges, and direct damage from mechanized logging. Underlying all is a fundamental disagreement about what makes a healthy forest. The traditional logger's view of what is "healthy" includes thinning and clearing to promote faster growth of straighter trees, usually focusing on one or two valuable species. Such practices make sense only when the goal is to maximize timber production. Ecologically healthy forest management puts its focus on diversity, complexity, intact food webs, viable populations of native plants and animals, and rare species. In ecological forestry, forest interior conditions are protected and edges that promote contagion are minimized. Dead and dying trees are retained as wildlife habitat, and fallen trees are retained for nutrient retention and structural habitat value. *In temperate deciduous forests like ours in northern New Jersey, such stewardship for ecosystem health and resilience does not create large clearings but aims instead to enlarge the undisturbed area* and to protect forests from invasive species and fragmentation. These practices promote large, self-protecting forest growth and preserve our critical watersheds.

6. A number of mistaken concepts underlie the Plan, causing serious ecological conflicts with its stated purposes. One is the mistaken idea that clearing within old forests will help to promote old growth forest conditions. Structural complexity develops naturally as forests mature. Creating large openings, as proposed by the Plan, delays rather than accelerates old forest development. Many stands in SMWMA area have the structure and species composition of forests well on the way to old growth conditions without interference.

Another error is the idea that we have too little young forest. The Plan aims through repetitive logging to permanently replace extensive areas of old maturing forests with clearings that ideally will become young forests. *New Jersey does not need young successional forest; what we urgently need is more buffering, protection, and expansion of forest that has managed to return, survive, and mature over the past century.* Moreover, for resilience our forests need intact forest expanses to avert extinctions, allowing not only birds but less mobile plant, insect, and small animal populations to migrate poleward as the climate warms. New Jersey has abundant lands not covered with maturing forest where young forest could instead be developed,

including old fields and lands, both private and public, where deer and invasive shrubs and vines are now preventing forest establishment.

In conclusion, creating numerous large forest openings throughout Sparta Mountain Wildlife Management Area will cause far more ecological harm than good. *The WMA now is a landscape of priceless forests whose unbroken extent is key to their health, resilience, value to native species, and landscape and state-level importance.* Instead of creating holes in these forests, the Plan should abandon these inappropriate commercial goals and instead continue stewardship actions that focus on protection from such incursions.

Thank you for your attention to our concerns.

Sincerely,
Julia Somers, Executive Director
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