



NEW JERSEY HIGHLANDS COALITION

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RE: Comments on Mahlon Dickerson Reservation Forest Stewardship Plan Objectives

Dear Mr. Caggiano:

Morris County's Mahlon Dickerson Reservation lies within one of the most significant areas of mature, contiguous and unfragmented forest in the New Jersey Highlands Region. It occupies a central location along the "Sparta Mountain Greenway" in Sussex and Morris Counties, one of the "Critical Treasures" of the Highlands Region. The Sparta Mountains, the westernmost ridge of the New Jersey Highlands, form a connection between Hamburg Mountain WMA on the north, through Sparta Mountain WMA, Mt. Paul State Park, Mahlon Dickerson Reservation, Weldon Brook and Rockaway River Wildlife Management Areas, and extend south to Allamuchy State Park.

The USDA/Forest Service *New York-New Jersey Highlands Regional Study, 2002 Update* identified the Sparta Mountain/Lubber's Run ridges as a Conservation Focal Area at risk. Although the task of preserving high quality open space in the Sparta Mountains is not yet completed, today the area's public preserved lands total over 13,000 acres, of which Mahlon Dickerson Reservation and its contiguous tracts total over 9,500 acres – a significant number in the small state of New Jersey.

Mahlon-Dickerson is also a significant part of the Rockaway River Watershed, which supplies Jersey City's Boonton Reservoir with drinking water, and begins its journey in headwaters high on Sparta Mountain, in Mahlon Dickerson and in Morris County's Farny Highlands.

According to the Park Commission website, Morris County stewards over 18,730 acres of parkland, and Mahlon Dickerson is "the largest park of the Morris County Park System," encompassing "3,200 acres of near wilderness and recreational areas" that include the highest point in the County at 1,395 feet. It is appropriate to note that Mahlon Dickerson is a **park**; it is not a commercial forest, nor a state or national "forest," but a park whose primary purposes are conservation of natural resources and recreation.

The New Jersey Highlands Coalition has reviewed the Forest Stewardship Plan Objectives within the context of the FSC-US Management Standard (v 1.0), distributed with the Objectives, in particular, Principle 9: Maintenance of High Conservation Value Forests, which states that

“Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.” “Intent: High Conservation Value Forests are managed to protect and maintain their identified high-conservation value attributes. In some cases, active management is consistent with these attributes, and in other cases (e.g. most old growth forests), active management is specifically precluded. ...FSC defines High Conservation Value Forests as those that possess one or more of the following High Conservation Values (HCV’s)”; “2. HCV forest areas containing globally, regionally, or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance:” and “4. HCF forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)...” FSC-US Forest Management Standard pp 61-62.

Appendix F “High Conservation Value Forests” provides definitions and guidance on these terms. **High Conservation Values:** “HCV 2 includes relatively contiguous areas of forest (which may be crossed by land management roads or public roads). At a minimum these forests are likely to be thousands or tens of thousands of acres in size. However, ‘large’ is relative to ecoregion landscape context (particularly the size of forested blocks in the ecoregion) and might be smaller or larger than this figure...In ecoregions where natural forests are heavily fragmented by forest type conversion or land use conversion, the increased value of smaller occurrences of remaining natural forest should also be included in the assessment. The forest may be in single or multiple ownerships...”

“HCV 2 also includes the following regional examples: ... “Northeast: ... More common in the northeast are discrete areas of biodiversity value (i.e. they generally contain one rare natural community or an endangered species or two) that are not part of a network of isolated but interconnected habitat that would lead to HCVF status at the landscape scale...” FSC-US Forest Management Standard pp 102-103.

We submit that the Mahlon-Dickerson Reservation, to the extent that it is even appropriate to consider this *public park* for “forest management,” must be considered as a “High Conservation Value Forest.

The New Jersey Highlands Coalition submits these General Comments on the Forest Stewardship Plan Objectives:

- We are deeply concerned that none of the objectives include concerns for intact areas of contiguous, mature forests and the declining forest-interior species that depend upon them (i.e., avoiding effects of edge and fragmentation). The region surrounding and including Mahlon Dickerson Reservation, which includes three state wildlife management areas (Sparta Mountain, Rockaway River and Weldon Brook), the recently acquired Mt. Paul Reservation, plus non-profit preserved lands, is perhaps one of the most significant areas of mature, unfragmented contiguous forest in all of northern NJ, totaling more than 10,000 acres. To the detriment of this rare and valuable ecosystem type, this set of objectives is

focused on the creation of early successional habitat, and will severely degrade critical interior-forest conditions and values that have been attained over many decades. Such interior forest habitat is critical to species such as cerulean warbler (previously proposed for federal Threatened Species status under the Endangered Species Act), ovenbird and many other species of warblers and neo-tropical migrants.

- We are also concerned that there is no mention of delineating large natural areas not subject to manipulation, which should and could be created throughout Mahlon Dickerson in all types of geology and of soils, in valleys, slopes, and along ridgetops, and certainly the unique Pine Swamp itself, in order to allow natural processes to continue unfettered in the most pristine settings. The County Park website specifically notes the “near-wilderness quality” of Mahlon Dickerson Reservation, and motorized access off Weldon Road is essentially limited to a couple of picnic and camping areas. Yet, these proposed forest stewardship objectives indicate no intention of designating large roadless areas, devoid of new or re-established logging roads, and preventing illegal motorized (ATV) access.
- Since landscape scale management plans have been or are being prepared for large, adjacent state conservation lands (Weldon Brook WMA and Rockaway River WMA, and perhaps other public and non-profit conservation holdings in the Sparta Mountain area), a *regional* GIS landscape analysis of forest cover types to demonstrate actual and proposed future amounts of different stages of forest succession, forest cover, and forest patch size distribution is needed. It must be determined through comprehensive scientific analysis, coordinated between the NJDEP and the Morris County Park Commission and other relevant parties, if there is or will be any insufficiency of forest age classes, whether early successional or mature, now or in the future.
- The proposed forest stewardship plan objectives show no intent to encourage or even to allow future old-growth forest characteristics. The Park Commission knows and is aware of the public’s love and appreciation of big, old trees, and public awe of old growth stands, which rate extremely high in the public’s mind as a treasured scenic and natural resource. In fact, in many places, groves of large or old-growth trees become by themselves tourist attractions, (e.g. the 3,800-acre publicly-owned Joyce Kilmer Memorial Forest). The Morris County Park Commission’s motto “Enjoy the Experience” would be well served by maintaining, preserving and fostering the mature forest in Mahlon Dickerson. We know from the approved forest stewardship plan for adjacent Weldon Brook WMA that much of the currently maturing forest is slated to be put into a logging rotation, resulting in a lack in the future of mature forest in the region. Further, at Weldon Brook, an insignificant old growth reserve has been proposed for an inappropriate area -- a place that was largely a cleared agricultural settlement in the late 1800’s, where virtually no valuable timber exists today and where past agriculture practices have eliminated forest understory and herb diversity.

Since the plan for Weldon Brook will result in almost nothing but young and middle age forest, perhaps the best management for Mahlon Dickerson would be for the Reservation to be designated as a future old growth reserve. This would be especially appropriate, propitious and rewarding because huge portions of the Reservation have never been converted to agriculture, and therefore retain their original native soils with the capability of fostering a high diversity of shade-

loving and shade-tolerant native herbs and shrubs, unlike many other currently forested areas in the Highlands.

- There is an over-riding tone in the objectives as stated, that forest management is an absolute necessity in order to achieve conservation objectives. This approach lacks scientific or ecological underpinnings and ignores almost all the societal, environmental, water quality, health, climate change, and aesthetic benefits and services that can be provided by exemplary natural areas, old growth reserves, and core forest-interior habitats. Rather, it is based on utilizing forest resources to generate products and income.
- Instead, Morris County, as manager of one of the largest, county-owned reservations in the entire State of New Jersey has an outstanding opportunity, and we would argue, an obligation, to manage these public lands for conservation goals through utilizing the most up-to-date principles of the science of forest ecology.
- The proposed objectives contain no mention or concern for avoiding forestry on steep slopes, which are ubiquitous throughout the Reservation, and are laced with streams.
- The proposed objectives contain no mention of Special Concern (rare) species of plants, which are protected by the New Jersey Highlands Water Protection and Planning Act rules. “The Department shall not issue a Highlands preservation Area Approval (HPAA) unless it determines that the proposed activity will not jeopardize the continued existence of, or result in the likely destruction or adverse modification of habitat for, any rare, threatened or endangered species of animal or plant (N.J.A.C.7:38-3.11).” Although a forestry plan may not require a HPAA, nevertheless, the intent of the rules should be honored and respected.
- The same holds true for the protection of scenic resources, which are not mentioned as such in the proposed objectives. The DEP Highlands Rule states:
Existing public scenic attributes’ are any Federal, State, county or municipal parks, forests, wildlife management areas and natural areas, any areas acquired for recreation and conservation purposes with Green Acres funding, program or a non-profit conservation organization, any lands preserved as open space by a non-profit conservation organization and other areas as identified by the Highlands Council. (d) The Department shall not issue an HPAA unless the proposed activity would result in the minimum practicable degradation to a unique or irreplaceable land type or existing scenic attributes on the site or within the immediate area of the proposed project (N.J.A.C. 7:38-3.12(c)(d)).”
- Mahlon Dickerson Reservation is therefore by definition a public scenic attribute. Again, while a forestry plan may not require a HPAA, the intent and the letter of the NJDEP Highlands rules should be honored by the Morris County Park Commission in its planning for Mahlon Dickerson.
- Additional suggested goals and objectives:
 - inclusion of diverse and knowledgeable stakeholder groups in the development and implementation of forest management goals and objectives;
 - transparency in all aspects of the process;
 - implementing scientific, evidence-based management practices, which itself requires:

- a) Drawing from a diverse range of scientific expertise sufficient to represent the diversity of ecological concerns that are involved in adequate ecosystem management;
- b) Conducting thorough and comprehensive baseline studies to determine what conditions are present before deciding what kinds of management is needed, and;
- c) Monitoring and follow-up studies to determine whether management has been effective at achieving these goals (although monitoring and adaptive management are already mentioned).

Our specific comments are as follows:

1. Maintain and enhance ecosystem health, diversity and integrity.

a. Provide a more natural balance of age classes for forest successional types.

What is a “natural balance” – what evidence is there that succession is lacking?

Large areas of early successional stage classes are present in northern New Jersey’s landscape, if not necessarily on this property. We are lacking older forests because they are recovering from a history of logging and agriculture. We do not need more young stage classes, but more old ones – forests should be left alone to be able to reach more advanced ages. In natural conditions, large areas of early stage classes are created only by catastrophic wildfires, hurricanes, and other disasters, which happen on the order of centuries and do not need to be included as a goal for management.

b. Create more diversity with multiple stages of succession and a better developed understory.

We do not understand why this is listed as a management goal. Mahlon Dickerson already has a variety of different forest types. Below Headley Overlook, a beautiful understory of mature Mountain Laurel appears very healthy. Blogger Jozef Purdes provides a description of the area near the Pine Swamp:

“The scenery changes now. Pine trees become dominant, and the section you are in feels several degrees colder. You’ll pass through a small swampy area, which feels like lifted from a fairy tale. The fallen tree trunks and boulders are overgrown with moss, fern is everywhere and small pools of water border the swamp...Then, the trail becomes a wide woods road again and starts climbing...[later] the road passes scenic swamps on both sides, which feature beaver lodges.”

Why must every property have multiple stages of succession? A better understory would be attained by focusing efforts to reduce deer herbivory.

c. Identify stands of unique or important value and conduct forest stand improvement to maintain their health and productivity.

These are silvicultural goals, not forest ecology goals. There is no evidence that “forest stand improvement” will improve the health, beauty, biodiversity, or the recreational values or the public’s enjoyment of the forest, just forest growth rates. These artificial selection measures may actually be detrimental to the health of the forest in the long-term by introducing human values where natural selection should be operating.

d. Manage white-tailed deer populations to encourage natural forest establishment.

Without knowing the current deer density for this area or how targets will be set, we maintain that it is no need to remove the existing forest and risk that re-establishment will fail due to over-abundant deer. Deer can be managed with the

existing forest in place to enhance the layer of seedlings, saplings, herbs, and shrubs. Further, hunting is already permitted in the Reservation.

f. Establish and enhance young forest stands.

No evidence has been presented to indicate that young forest is needed in this core component of an important, significantly large, regional preserved area, especially since nearby public land areas are already being planned for large, permanent, young forest rotations.

g. Reduce the risks of catastrophic disturbances such as insects, disease and wildfires.

Numerous diseases and insects are already present or approaching, and there is no scientific evidence that resiliency in the face of the specific threats to this forest will be enhanced by management. Also, there is no scientific evidence that catastrophic disturbances have negative consequences. There is also no guarantee that purposeful catastrophic disturbances yield positive results; in fact most logging in the Highlands region results in a significant conversion from native to alien species in the forest understory. Should this trajectory result, vast amounts of expensive herbicide would be needed to combat this problem effectively, with serious potential impacts to Highlands water resources, which supply two-thirds of New Jersey's population.

h. Preserve and protect threatened and endangered plant species or communities.

The Highlands Act protects rare species in the Highlands Preservation Area. The objectives must include mention of the numerous, declining special concern (rare) species. Inventories should be conducted for all rare (Special Concern, Threatened & Endangered) species of birds, reptiles, amphibians, dragonflies, damselflies, lepidoptera, and other targeted rare insects. There must be a thorough effort to locate areas that would qualify as additional designated Natural Heritage Priority sites.

2. Reduce or eliminate terrestrial invasive plant species found with the park, and protect the area from the introduction, establishment and spread of invasive species.

e. Minimize the future spread of invasive species by adhering to best management practices for all forestry work undertaken in the park.

There is no evidence that Best Management Practices can reduce the spread of invasives. The seed bank for invasive species is widespread, and the increases in light intensity and extreme soil disturbances that result from logging guarantee an increase in invasive species populations.

3. Sustain and enhance wildlife habitat.

b. Implement responsible silviculture, where feasible, to increase the diversity and abundance of target wildlife species.

It cannot be assumed that silviculture is necessary to benefit wildlife. What if the rare species present today in Mahlon Dickerson Reservation require other stewardship activities or no activities at all? For example, fisher, bobcat, mink, river otter and (perhaps) even lynx, to name several mammals that likely inhabit the Reservation now, and would not benefit from active "forest management."

f. Promote regeneration and growth of fruit-bearing shrubs.

Why are mast and fruit bearing shrubs incentivized? There are innumerable reasons why woody plants of all other types, such as sweet birch, provide the basis of the food chain in their leaves, catkins, pollen, for hundreds of important species.

g. Protect and create standing dead snags for cavity nesting birds.

Has a shortage been measured and documented? It is extremely unlikely that this situation exists. Mature Highlands forests with large trees tend to be full of Pileated Woodpeckers, Barred Owl, Cooper's and Red-Shouldered Hawk, and cavity-nesting birds.

h. Protect trees with exfoliating bark for roosting bats.

Trees do not have to possess exfoliating bark (as in shagbark hickory) to house roosting bats. Large, mature trees of almost any species (except American beech) have ridges, furrows, and other irregularities that serve roosting bats. Instead we question whether there be an objective to encourage huge, old-growth, hollow trees and other features useful to bats?

4. Balance recreational demand and trail development with restoration and protection of ecological resources.

a. Balance recreational use and aesthetics with sustainable forest management.

Regardless of which agency would be applying aesthetic management framework (e.g. USFS Scenery Management System, BLM Visual Resource Management, or the DOT's Federal Highway Administration Visual Impact Assessment) this would be a difficult goal to meet. Sustainable forest management would need to be defined. The primary purpose of a public county reserve is to serve the public with environmental, ecological, recreational, scenic and spiritual benefits. It is doubtful that "sustainable forest management" will contribute to these goals.

c. Improve passive recreational experiences by enhancing habitat for a diverse array of wildlife.

In this context, "passive" is vague. Would it include wildlife viewing, bird watching, hiking, etc.? Experiences need to be defined and managed. Who would be the primary user groups for whom you are managing, and what types of experiences are to be provided?

d. Protect and maintain viewsheds around vistas, hydrological areas and other important locations.

Viewsheds need to be defined. Again, which aesthetic resource framework is being used?

5. Protect and enhance hydrologic resources.

a. Use established forestry and wetlands BMPs for activities in riparian, wetland or buffer areas including appropriate streamside management zones, crossings and recommendations for coarse woody debris.

These BMPs are only designed to avoid the worst case scenarios – they are not developed by wetland scientists to protect or benefit wetlands, and should not be used as guidance documents for ecological management. As headwaters for water that supplies more than five million New Jerseyans with their drinking water, protection of its ground and surface water quality and supply should be a highest priority objective for Mahlon Dickerson.

c. Reduce potential impacts on water quality.

Numerous ecological studies document impacts to water quality following forestry activities (see Likens data). It would appear highly imprudent to embark on large-scale conversion to early-successional forest, with the associated network of logging roads, compaction and erosion, which have an almost guaranteed potential for water quality degradation. Mahlon Dickerson contains significant headwaters of the Highlands water supply for millions of New Jerseyans who rely

on surface water sources that originate in Highlands wetlands, waterways and reservoirs. We ask you to consider if the desire to expand early successional habitat in the Reservation outweigh the associated risks and threats to water quality and water supply, increases in invasive species coverage, native species regeneration failure due to deer over-abundance and competition from invasive species, and other unseen risks.

d. Establish and recruit appropriate vegetation to minimize erosion and sedimentation.

This is only necessary if roads are created for machinery and trucks, or if forestry is being done on slopes.

6. Manage forest in a manner compliant with FSC Principles and Criteria.

a. Ensure protection of environmental, social and economic high conservation values as defined by FSC.

We thank the Morris County Park Commission for the opportunity to comment on these objectives, as suggested in the FSC criteria.

Thank you for the opportunity to offer these comments on the proposed Forest Stewardship Plan Objectives for Mahlon Dickerson Reservation.

Sincerely,



Julia Somers
Executive Director

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