



May 21st, 2021

David Golden, Director
Division of Fish & Wildlife
Department of Environmental Protection
Trenton, New Jersey
CC: Assist. Commissioner Ray Bukowski

Dear Director Golden,

On behalf of the NJ Highlands Coalition, thank you for the opportunity to comment on the Draft Addendum to the 2017 *Sparta Mountain Wildlife Management Area Forest Stewardship Plan*. While the Coalition continues to seriously question the justification of cutting healthy intact forest in the Highlands region, an area recognized by law as having critical value to the quantity and quality of New Jersey's water supply, we appreciate the Department of Environmental Protection and the Division of Fish & Wildlife producing this Addendum to address some of the serious concerns raised by the community.

Before commenting on specific elements of this Addendum, the Coalition exhorts the Department to review and seek approval of this Addendum by those Bureaus within DEP consulted for the 2017 Forest Stewardship Plan. This will ensure that provisions in this Addendum to protect important waterways, fish, rare plants, and trails are given due consideration, and demonstrate the durability of the Addendum while the *Area Management Plan* is prepared. We would also extend this to include the NJ Highlands Water Protection & Planning Council, as the regional authority covering Sparta Mountain WMA.

Regarding the Addendum, we appreciate the additional attention given to deer control and invasive species management. Without adequate monitoring of these pervasive threats to New Jersey's forests, other management objectives cannot be expected to be successful. Further, the Coalition respects the Department's outline of a strategy to confine management for young forest to a limited area within the WMA, and recognizes the inclusion of Stands recently managed for this objective (Stand 18, 12 and 9). However, we query the numbers regarding the total acreage eventually under management which differ in the list on page 1 and the table on page 7. In discussions with the Department we understood that the total acreage would be limited to 200 acres within the WMA over 20 years. Selecting 15 acre sites over the next 7 years will obviously increase the number of acres under management noted in the table on page 7 where 10 acre sites are used to calculate a total of 88.4 acres. The NJ Highlands Coalition cautions the Department that in the interest of our good faith agreement, the total area managed for young forest on Sparta Mountain WMA will not exceed 200 acres. Perhaps a clearer distinction is necessary between the total acres managed year-on-year and the total acres managed for young forest at Sparta Mountain WMA.

With regard to site selection for the next phase of cuts, the Coalition advocates seeking sites where there *are not* the oldest and biggest trees, and instead select areas where the existing terrain and natural features are ideal for the wildlife species the project is intended to support. The coupling of forest and wildlife conservation with contract logging remains incredibly problematic, especially on our public lands. However, by steering projects away from the oldest and largest trees, the loss in carbon sequestration potential can be reduced and

the Division can meet its habitat objectives without undermining other intrinsic values and ecosystem services provided by our forests.

One very concerning issue with this Addendum is the section concerning vernal pool protection. The requirement of a 400 foot boundary from both “potential” and “certified” vernal pools is encouraging since it is our understanding from discussions with the Department that it does not have the human resources available to carry out the necessary evaluation of vernal pools, and we have noted that a number of “certified” pools have been relisted as “potential”. More troubling is that only a 100 foot buffer be required in the case of a shelterwood cut. The NJ Highlands Council’s [Technical Report on Ecosystem Management](#) determined that a 1000 foot protective buffer be provided to vernal pool systems. The report establishes that this size buffer is “scientifically robust” with several references to studies related to water quality and habitat preservation. We are aware that the 400 foot buffer standard is derived from the original *SMWMA Forest Stewardship Plan* and based on the [Vermont Biology Technical Note 1](#). However, the Technical Note goes on to state that:

If the landowner is interested in managing for vernal pool wildlife then a 600 foot or larger buffer should be used. This will accommodate the upland habitat needs of the majority of the population of mole salamanders (note: wood frogs will generally travel much further). When productive forest and timber harvesting is an objective, buffer the pool area to 400 feet. Note that this 400 foot distance will only address a portion of the habitat used by pool breeding amphibians. (p. 4 Vermont Biology Technical Note 1)

There appears to be a serious discrepancy here and we urge the Division of Fish & Wildlife to engage the NJ Highlands Council, and defer to the 1000 foot buffer standard recommended specifically for the New Jersey Highlands region. We absolutely object to the 100 foot buffer provision for shelterwood cuts.

It is regrettable that heavy machinery must be used to carry out the proposed management since its use invariably causes damage to public trails and negatively impacts the visitor experience to the WMA. Based on numerous site visits by the Highlands Coalition, it is apparent that compliance with BMPs is often compromised. The BMPs are not always sufficient to insure appropriate erosion and sediment control. Adequate oversight is necessary and problems that occur during and after the logging practice must be addressed. Considering this we urge the Department and those charged with overseeing the projects to carefully employ all available measures to reduce the impact machines have on the forest roads and trails, stream crossings, wetlands and other natural features that need to be navigated to access the stands. Further to this, it is important that the Department implement measures to ensure that access into the WMA by off-road vehicles is not possible. Very often the entry points created to bring equipment into the WMA quickly become entry points for these vehicles, and we know the Department does not have the resources to police every WMA all the time.

Once more, we appreciate the NJ Department of Environmental Protection and the Division of Fish & Wildlife’s willingness to collaborate with the local community and engage stakeholders in the development of this new proposal.

Sincerely,

Zachary Cole, Outreach & Education Director, NJ Highlands Coalition
on behalf of the NJ Highlands Coalition Natural Heritage Committee