

August 11, 2021

To: Sharon Petzinger, NJ Div. Fish & Wildlife

CC: David Golden, NJ Div. Fish & Wildlife, Ray Bukowski, NJDEP Asst. Commissioner

## **New Jersey Highlands Coalition comments concerning proposed forest management for Stand 9a at Sparta Mountain WMA.**

On behalf of the NJ Highlands Coalition and the NJHC Natural Heritage Committee, we appreciate the opportunity to comment on this next phase of management proposed for Sparta Mountain Wildlife Management Area (SMWMA). It should be noted that commenting on the particular details of this proposed project is complicated until the NJDEP and/or the consulting forester have marked the boundary of the actual work site and identified which trees are to be cut. The NJ Highlands Coalition and the NJHC Natural Heritage Committee remind NJDEP that we do not endorse any of the current forest management or stewardship projects proposed for SMWMA. While we have strongly encouraged the Department to undertake various restoration projects to address the problems of invasive plant species or the overabundant deer population, this stewardship work is rarely proposed nor have these issues been addressed in any meaningful way on other sites.

That being said, following review of the updates for SMWMA posted on the Division's Website and a field visit to Stand 9a, we have several questions and concerns. Once the worksite boundary and trees are marked, we will assess the project on the ground and communicate any concerns that arise.

- Scope of work and project location:  
According to the Division Website the management proposed for Stand 9a is a "shelterwood prescription." Since this is not a prescription recommended for GWWA habitat creation, it raises questions about how this project fits into the ongoing agreement to limit management on SMWMA to projects meeting that objective. Further, the NJ Blueprint mapping resource (NJMap2) indicates, quite clearly, that *the whole* of Stand 9a is within a Natural Heritage Priority Site. This fact is also acknowledged in the 2017 SMWMA Forest Stewardship Plan (2017 FSP) with this definition: "priority sites are some of the State's best habitats for rare and endangered species and ecological communities." Given the Office of Natural Lands Management's recognition of this site as being of particular ecological importance, we have to question the NJDEP's justification for pursuing *any* forest management at this site. Additionally, SMWMA is a Green Acres property where the commercial harvest of wood products runs counter to the preservation and/ or recreation purposes for which this land was acquired and protected.

In the very brief project description on the Division's Website it states that "20 - 30 large trees" will be retained per acre. This is fewer trees/acre than originally prescribed in the 2017 FSP; an explanation for this change is needed. More importantly, a definition and specific dimensions of what constitutes a "large tree" should be provided for this site. Without this definition, tree selection is arbitrary and *all* of the largest trees could be uniformly removed from a site. We ask that NJDEP provide this information with an explanation and rationale.

- Access to the proposed project site:

One of the principal concerns about the selection of this site for management is the access route to Stand 9a. We are presuming that the machinery required will be transported via the trails starting at the historic mine site. This trail's proximity to the Edison Mine, the Monument, as well as the convenient parking facility, mean this particular trail and the connecting loops are among those most popular at SMWMA. While a temporary closure of a particular trail for maintenance purposes is acceptable, the longer closure duration corresponding with the forestry management is not. Further, it is inevitable that manoeuvring machinery along here will widen the trail from the existing forest single track to a forest road. This will make the trails more appealing to ORV/ ATV riders, which are already an ongoing, negative issue at the SMWMA.

During our recent field visit to the site we observed fairly dense invasive plant species present around the trailhead near the monument, and along the trail into the forest. Notably, once along the trail, the non-native species abundance decreases and there are several instances of natives being present. With the introduction of machinery carrying invasives' seeds along the trail and disturbing the soil, these native plant communities will be compromised, and the surrounding environment left in worse condition than before the project.

- Natural resources protection:

- C1 Streamlet: Beyond the northern boundary of the mapped polygon showing Stand 9a is a Category 1 stream below a slope. This water body should be given the maximum protection to avoid any degradation from silt and dirt runoff from the Stand. If work is to proceed to this site, mitigation measures to protect this water must be implemented.
- Vernal pools and wetlands: There are evident wetland areas and vernal pools at the entrance to the WMA near the mines and along the access route to the stand. If work is to proceed at this stand, measures need to be taken to protect these areas. These measures should extend to physically demarcating the resources and the buffer boundary so they are clearly evident and left undisturbed.

Also, if work is to proceed at this site, the NJDEP should implement the 1000 foot buffer zones around vernal pools recommended in the NJ Highlands Council's *Technical*

*Report on Ecosystem Management.* NJDEP is charged with protecting the Preservation Area of the Highlands. Therefore, at a minimum, it should be implementing recommendations and practices adopted by the Highlands Council for these natural resources and habitat types.

Finally, on behalf of the NJ Highlands Coalition and the NJHC Natural Heritage Committee, we once again urge the Department either to abandon work on this site, or to pursue a different stewardship project that would address some of the documented issues (invasive species) present in the vicinity of the monument. If the Department is intent on pursuing the forestry work at Stand 9a, then we strongly recommend that a girdling prescription be implemented, instead of mechanized cutting, and no wood product be removed from the site. In this way the forestry work will at least mimic some of the natural gap openings in the canopy, and greatly reduce the accessory environmental destruction past experience on SMWMA has proven will be incurred by removing logs from the site.

We look forward to your response.

Sincerely,

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