The Hawthorne Park Club, Inc. (HPC) is a non-profit corporation that has existed since 1895. It owns 464 acres which border on the westerly side of the Sparta Mountain WMA and is the site of a 120-year old community surrounding Hawthorne Lake.

The HPC property borders on stands 1, 2, 13, 14 & 24 of the proposed Forest Stewardship Plan (FSP) prepared for the NJDEP by the New Jersey Audubon Society (NJAS). Therefore, HPC is impacted by the FSP and should be considered one of the key stakeholders*.*

**HPC firmly objects to the FSP, as proposed, for the following reasons:**

**Notice:**

1a. The FSP failed to identify and notify all appropriate stakeholders. Although HPC was a founding member of The Friends of Sparta Mountain approximately 25 years ago and the owner of extensive contiguous lands, the NJAS did not designate HPC as a stakeholder.

2. The FSP lacks specificity regarding its implementation and processes. For example, much of the FSP purporting to define management defers management to a later period. Without a detailed explanation of how the FSP will achieve its intended result, it cannot be adequately reviewed in its current form and should not be approved.

**The FSP Generally:**

3. Despite using self-serving conclusory language, the FSP offers no discernable proof that the forest is either (a) distressed or (b) in need of such drastic measures as those espoused by the NJAS. Mere assertion by an organization of a stewardship role is not a substitute for ***facts*** nor does it provide license for unilaterally curtailing the rights of other citizens of the State.

4. It appears that no competing or independent studies have been ordered or considered. HPC requests that the DEP obtain additional studies from a broad base of expertise prior to commencing such an irreversible program. The present FSP is arbitrary and capricious and only serves the interests of the DEP (and marginally the NJAS). It fails to address the interests of the community at large.

5. Clear cutting (what the FSP calls “Seed Tree with Reserves”) does not serve the best interests of the effected communities as to aesthetics, ecological, environmental and economic impacts. It appears that the DEP has engaged the NJAS to justify, ratify or endorse its desire to aggressively log the lands under its control. Commercial gain, not protection of the land, is the undertone throughout the FSP.

**The FSP Specifically:**

6. The economic impact of the FSP was not studied nor considered (other than the anticipated windfall to those conducting or receiving the proceeds from the cutting). The FSP is void of any considerations to the “human” residents of the surrounding areas. Clear cutting will have an adverse impact on property values.

7. At a recent meeting, oral representations were made to HPC by Donald Donnelly, one of the authors and signatories of the FSP, that clear cutting would not be employed regarding Stands 1 & 2. This is in contradiction to the FSP, which indicates on pages 37-41, that clear cutting ***will*** occur on Stands 1& 2. Logging on Stands 1 & 2 would impact HPC in several negative ways: increased run off to its lake, siltation, spreading of invasive aquatic plants and disruption of natural beauty.

8. Section 2.9 (page 14) of the FSP includes a discussion of streams present within the Sparta Mountain WMA. Identification and discussion of the stream exiting Collins Pond, as well as several other streams in the same areas from artesian aquifers entering Hawthorne Lake have been omitted. Such considerations must be included in the FSP. HPC will be severely impacted by any activity that affects Collins Pond and the subject streams, most notably regarding invasive aquatic plants, siltation, degradation of Hawthorne Lake’s water quality and aesthetic issues.

9. We strongly recommend that those areas designated in the FSP to be clear cut (“Seed Tree with Reserves”) (a) be eliminated, (b) be replaced with a less invasive and more responsible thinning program and (c) not be within the sight lines of the bordering properties and residents.

**Prevention of Irreparable Harm:**

10. The FSP contains no provision for public review, comment or alteration of the FSP after the FSP is implemented. The FSP only provides for internal review (page 3). Provisions should be included to allow the public to monitor the FSP during its tenure at specific intervals with the ability to prevent or stop continued irreparable harm or mismanagement by the State’s designees. Potential harm is irreversible during the lifetime of the residents, the dubious benefits of which they will never witness.

HPC strongly urges the NJDEP to reject the proposed FSP, require a competing and/or independent study of the FSP and afford consideration of the above-listed objections, alternatives and recommendations.

Respectively submitted,

The Board of Governors

Hawthorne Park Club

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