

TOWNSHIP OF SPARTA



Township Manager
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March 29, 2016

State of New Jersey
Department of Environmental Protection
Attn. David M. Golden, Chief
Bureau of Land Management
Division of Fish & Wildlife
Mail Code 501-03
P.O. Box 420
Trenton, N.J. 08625-0420

RE: Forest Stewardship Plan / Sparta Mountain

Mr. Golden:

I am writing on behalf of the Mayor and Council regarding the Sparta Mountain Wildlife Management Area Forest Stewardship Plan developed by New Jersey Audubon in conjunction with the New Jersey Fish & Wildlife. The municipality understands that the expressed purpose of this project is to maintain the health, diversity, integrity of the environmental ecosystem by establishing planned stages of succession of the forest over an extended number of years. The goal of diversifying wildlife and plant species within the affected tract would suggest positive environmental benefits from the project. However, that is not as clear a result to us as the plan suggests based on the various information and comments received, particularly as pertains to the single species of bird identified (the golden warbler). That being said, we have a number of concerns about the implementation of this project and its impact upon the community here in Sparta. First, we want like to know what studies or evaluations have been done with respect to the impacts of potential damage from increased water runoff and erosion in and from the forested areas of the plan. The Township experienced problems in nearby areas such as Edison Road after Hurricane Sandy and wants to ensure sufficient protections are in place. Relatedly, we would like to know what provisions are being made by the State to address potential damage to roads and other infrastructure from trucks and other logging equipment brought to and from the site over the course of the project. Will streets be swept regularly during the project to minimize mud and debris accumulation? Is a Soil Erosion and Sediment Control permit required for this project? What are the proposed season(s) and hours of operations, particularly with respect to the potential impacts of truck traffic during school bus pick-ups and drop-offs and on holidays? Have the different headwaters for the watershed been identified and were any long term effects from the logging operations identified? Along with that aspect of the plan what, if any, impacts have been forecasted for drinking water resources in the area?

Other concerns/issues of the Council are with the timeline discussed in the plan and the presentation given to the municipality. It states ten years, but the municipality understands that it could be over a period for as much as fifty years. What is the real timeline presently forecasted for the forest stewardship plan work? Also, where is the funding for the project and, in view of its extended implementation, what are the impacts upon it if funding ceases? Are there any proceeds from the sale of wood taken from the project and, if so, what is the estimated total revenue received over the life of the project? Would these funds be dedicated to other open space projects or put back in the general fund? As Sparta Mountain is a recreational area used by many residents and visitors to the area, what safeguards are to be put in place to help ensure their safe use of it during periods/seasons of work? While the reforestation effort is underway where will the equipment be stored and how will it be secured? Will existing wildlife in the proposed work areas be pushed out towards bordering neighborhoods and what are projected short/long term impacts of it until reforestation takes hold? Lastly, was a Request for Proposal (RFP) ever issued on the proposed project and, if so, has a contract been awarded?

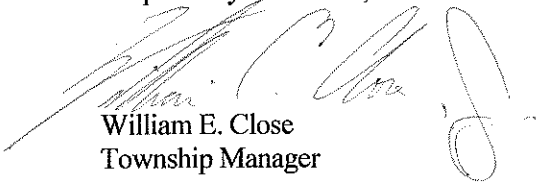
Further, we find it difficult to render an informed opinion on several aspects of the plan that even experts on both sides of the plan cannot agree on. Hopefully, the State will take under advisement the safety concerns, possible property value implications, as well as the ascetic impacts on area vistas, that were expressed to the Governing Body when the State formulates its final position on implementation of the plan. While we recognize the value and can support the concept of forest stewardship, it should be done in an responsible and prudent manner that minimizes impacts upon communities and residents that border the area where the work is to be undertaken. In this particular area many residents purchased their homes with an expectation that the adjacent land was protected by the State and activities there would be regulated accordingly. With respect to the partnership between the State and the Audubon Society on the project, who is responsible for monitoring the implementation of the plan and compliance with the established parameters in the scope of work?

Finally, we have attached comments from the Township Planning Board and Environmental Commission with respect to the Forest Management Plan on Sparta Mountain. Their comments are self-explanatory. We feel that their remarks, in conjunction with those of the Governing Body, reflect the concerns of our residents about this project.

Therefore, in view of the foregoing, we would respectfully request that the project be temporarily suspended by the NJDEP pending the Public Hearing to be held on the aforementioned Forest Stewardship Plan and until such time that all the questions and comments from interested stakeholders at that meeting can be evaluated before any decision on moving the project forward is made. In our opinion, it would seem to be the prudent course of action given the varying information and opinions that have been proffered on the stewardship plan.

Should any additional information or action be required on our part with respect to the proposed public hearing and the continued dialog on this project, please let us know. Thank you for your consideration.

Respectfully Submitted,



William E. Close
Township Manager

WEC/ml

Cc: Mayor Christine Quinn
Township Council
State Sen. Steve Oroho, 24th Legislative District
State Assemblyman Parker Space, 24th Legislative District
State Assemblywoman Gail Phoebus, 24th Legislative District
Cindy Randazzo, NJDEP, Dir., Office of Local Govt. Assistance
Sharon Petzinger, NJ Fish & Wildlife
Eric Powell, P.E. Township Engineer
Thomas Ryan, Esq., Township Attorney
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