



SUSSEX COUNTY SOIL CONSERVATION DISTRICT

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March 31, 2016

David M. Golden, Chief
NJDEP
Division of Fish and Wildlife
Bureau of Land Management
P.O. Box 420
Trenton, NJ 08625-0420

Re: Sparta Mountain Wildlife Management Area-Forest Stewardship Plan.

Dear Mr. Golden,

I am the District Manager of the Sussex County Soil Conservation District. We are a special purpose unit of government and are subject to the overview of the State Soil Conservation Committee (SSCC) within the NJ Department of Agriculture (NJDA). One of the primary missions of the District is to promote the proper use, management and stewardship of land within Sussex County.

The terms "conservation" and "stewardship" necessarily involve the "wise" use of land with the goal of protecting the resource for the future. The need for management and stewardship is especially important for public lands. The management of public lands must be conducted to the highest standards of land management. The implementation of the Sparta WMA- Forest Stewardship plan could serve as a model for future state land management efforts. It is therefore critical that it be prepared and implemented correctly. The FSP that has been published and circulated is a good start. However, we believe that the current plan lacks the specificity needed to adequately ensure the protection of the forest natural resource. We would therefore offer the following comments:

- 1) **Supplemental environmental management document:** The District has recently been involved in regulating the installation of both a natural gas pipeline and an electrical transmission line across Sussex County. One technique utilized in one of those projects involved an environmental management appendix to the Soil Erosion and Sediment Control Plan. The Appendix provided engineering and environmental management strategies and practices to guide the operation when certain environmental conditions were encountered. These conditions included: stream crossings, steep slopes, wildlife crossings, wetland encroachments, wetland proximity and temporary road accessways. It also included practices and provisions for the restoration of the site upon completion of operations. Such an Appendix could provide clear guidance for protection and restoration of resource issues encountered in the field.

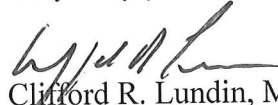
WITH THE RIGHT TO OWN GOES THE DUTY TO CONSERVE

STATE DEPARTMENT OF AGRICULTURE, STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION, COOK COLLEGE OF RUTGERS UNIVERSITY,
AND UNITED STATES SOIL CONSERVATION SERVICE, COOPERATING

- 2) **Strategy for road access:** The District is responsible for the enforcement of the NJ Soil Erosion and Sediment Control Act in Sussex County. One of the practices mandated by that Act is the use of construction entrances or tracking pads in all locations where a construction entrance intersects a paved roadway. The purpose of such a pad is to prevent the tracking of mud onto public roads. We believe that the FSP should mandate use of construction entrance/tracking pads at all heavy equipment access areas.
- 3) **Analysis of soils:** The current draft FSP does not contain any significant discussion or analysis of the soils present at the Sparta WMA site. The District is aware of several landslides in recent history involving Sparta Mountain (outside the WMA area.) Most of these involved lands where the tree population was impacted by the Woolley adelgid or where the land had been cleared for agricultural or residential use. The landslides tended to occur in areas of steep slopes and during times of heavy precipitation and high ground water. The most notable of these slides occurred in August 2000 in the Sparta Glen area and in March 2010 in a residential development known as Eagles Nest. There have also been several subsequent minor slides in the Eagle's Nest development (August 2012.) The soils at the Eagle's Nest site are characterized by a 10 to 12 inch surface organic layer overlaying a gravelly layer. In times of high groundwater the top layer can slough off (almost like a layer of sod) and can migrate down the slope. The sliding action is exacerbated by the absence of tree roots. There are published reports by the USGS as well as a published master's thesis investigation at NJIT. We can provide these references upon request. The current FSP does not consider this as an issue. At a minimum, we would suggest that there be an analysis of the soils and slopes and that logging operations be prohibited in areas that could possibly experience slides.

We thank you for this opportunity to comment. Please feel free to contact us if you have any questions or require the assistance of the District.

Very truly yours,


Clifford R. Lundin, M.S., J.D.
District Manager

Via First Class Mail
Via E-mail
Electronically to F&G Website