Comments submitted to NJ DEP Division of Fish and Wildlife dated January 26, 2016 regarding proposed Sparta Mountain WMA Forest Stewardship Plan

Thank you for the opportunity to comment.

Sparta Mountain is one of eleven areas within the Highlands considered by the U.S. Forest Service as priority conservation focal areas. (See USFS, New York - New Jersey Highlands Regional Study: 2002 Update, pp 229-30 ). The property is an important greenway corridor and home to a variety of flora and fauna including threatened and endangered species. As such, the Forest Stewardship Council PRINCIPLE # 9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS applies. The plan lists threatened and endangered identified in the region but fails to describe the impact of proposed changes on these populations. Nor does the plan address the impact of common animal populations such as bear, deer, and other varmints. The plan fails to address the dynamics of the forest and migrations sufficiently to evaluate construction, burning, and harvesting impacts. This plan does not meet FSC criteria for high conservation value forests and should be rejected.

 NJ DEPs Sparta Mountain WMA Forestry Management Plan describes the first steps of a commercial tree harvesting operation to be implemented over a period of 60 years. The construction and maintenance of roads within the Wildlife Management Area are expensive. The plan does not address improvements required for roads between the WMA and the Route 15 and Route 23 Corridors to support this operation. Furthermore, the combination of the geology, terrain, and thin soil depth elevates the risks of erosion damaging the environment, but also the surface water used by Ogdensburg, Newton, and surrounding lake communities. Lacking any cost analysis of the project and consideration of regional impacts imposing a cost burden to local communities and the State of NJ, the plan is incomplete and should be rejected.

The plan’s reliance on mechanical harvesting techniques is problematic. Heavy equipment to aid logging operations requires construction or major modification of roads. Compaction, forest segmentation, and subsequent maintenance and herbicide applications are detrimental. The plan poses significant environmental risks and additional costs to the public that it can ill afford. This Forest Stewardship approach is not appropriate for Sparta Mountain. If DEP wishes to pursue adequate maintenance of the Sparta Mountain WMA forest, it should consider non-mechanical harvesting techniques and consider leaving the timber cuttings on the ground to provide nutrients for future generations.

I urge you to require a public hearing for this proposal so the public can make their voice heard on this damaging proposal.

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Comments filed March 21, 2016

**Inadequate Stakeholder participation**: NJDEP admits the stakeholder process followed in preparation of this plan is flawed. Lack of outreach in the early phases in the planning process and unavailability of information resulted in inadequate Stakeholder participation. Even with the extension of the closing period for comments and professionalism of Division of Fish and Wildlife representatives at various presentations, it is not apparent if all the issues have been adequately addressed. Despite the extensions granted for the public comment period, adequate discussion of the goals and issues has not been addressed. You need to redo this plan and follow your revised procedures for stakeholder participation.

 The following are examples of why I make this statement:

As Conservation Chair for the NJ Sierra Club Chapter and the Skylands Group servicing Sussex and Northern Warren County, I received a number of calls from my membership shortly after the New Jersey Herald published an article regarding SM WMA FSP in early January, As we approached lake communities and town councils in Sparta, Hardyston, Ogdensburg, and lake communities, the common phrase I heard- “This is the first I heard of this.”

 In researching the issue, we quickly learned that the proposed plan supersedes a Sparta Mountain Forest Stewardship Plan. No one in the community had access to this plan until Bill Wolfe received a copy via OPRA request.

 Many of the foresters and ecologists that I contacted were unaware the New Jersey Audubon Society (NJAS) petitioned the Forest Stewardship Council to remove the designation of Sparta Mountain WMA as a “High Conservation Value” forest in 2013.

 NJAS is the steward for Sparta Mountain WMA and principle author of the Forest Stewardship Plan. Shortly after NJ DEP granted an extension of the comment period in February, NJAS issued an Action Alert to its members. This alert implored its membership to send comments in support of the SM WMA FSP. The Hardyston Township invited NJDEP to make a presentation regarding and listen to public concerns; yet the tone of responses from NJAS and NJDEP Division of Fish & Wildlife appeared as “Defenders” of the plan . (http://www.wolfenotes.com/2016/03/inside-christie-dep-commissioner-bob-martins-management-bubble/). Dealing with the public during the comment phase, I would have expected more of an “honest broker” or listening attitude. In bird and amphibian restoration, public participation has proven essential for success. The

public can play a major role in monitoring, managing adjacent locations, establishing human-free

areas, and publicizing the intentions of the project. Even an apparent failure can be a success if it

increases public awareness and inspires attempts at restoration in other locations.

Even small actions can alleviate effects of ecosystem degradation on wildlife diversity. The keys

to effective action are maintenance or restoration of habitat contiguity, preservation of seasonal

wetlands, increases in plant structural complexity, and promotion of native vegetation.

Repairing ecosystem degradation is a mammoth project, but the most immediate and necessary

steps in smart growth, conservation, and restoration are overdue.

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**Comments Filed March 21, 2016**

**Insufficient Analytical Support:** The SM WMA FSP is a strategic plan and not an operational plan. I do not expect detailed, technical analysis of each and every aspect, but I would expect at least a discussion of the impacts and alternatives considered. A budget allows you to make realistic plans for the time period that the budget covers, yet, there is no budget information provided. The benefits for “new forest” endangered species such as Golden Wing Warbler and Ruffed Grouse are described, but the overabundance of deer and impact of deep forest cover dependent species is not. The plan doesn’t even consider the impacts on the local communities, property values.

 If this plan is intended to be a logging plan or a “Young Forest Initiative” Stewardship Plan, NJ Forestry Association suggests the principle goal may be unrealistic. “While the stated objective is to manage up to 10% of the property in young forest it will be a difficult goal to achieve due to the poor market conditions in New Jersey for forest products. Loggers and buyers are reluctant to haul low numbers of log loads to distant markets. Additionally, many of these trees will generally yield fewer high quality logs than buyers would prefer. Forestry efforts over the past 5 years on Sparta Mountain indicate that reaching a 6% goal is more realistic than the 10% planned in this project.”

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Comments Filed March 21, 2016

**Analysis of Alternatives:**

 The proposed plan focuses on management techniques that purposefully mimic fires, floods, and storms (seed tree treatment, shelter wood treatment, and Hemlock group selection). The plan minimizes the more likely scenario of forest regeneration In temperate deciduous forests like ours in northern New Jersey; i.e.,, single tree die offs resulting in sporadic opening of the canopy (single tree treatment/pruning).

 States that adopt a “Young Forest Initiative strive to create and preserve young forests. The proposed plan addresses only efforts to create young forest.

 The plan’s focus on harvesting timber products disregards the importance of retaining fallen trees for nutrient retention.

 State of New Jersey needs to address policy issues before this action goes forward... Should public forest land management encourage preservation of “young forests” or actively create more young forest? What criteria do you use to favor a young forest endangered species over a deep forest species? What is best for Sparta Mountain? Should the State compete with privately owned woodlots?

 Please consider the comments of the enclosed presentation taken from Proceedings of the State of the Forest Symposium: Ecological Issues Regarding Highlands Forest Degradation & Restoration Held October 3, 2002, Presentation by Eric Stiles, pages 8-11

Impacts of Ecosystem Degradation

on Forest Wildlife Diversity

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Forest wildlife diversity depends on large contiguous forest patches, connections to other habitats, structurally complex vegetation, intact seasonal wetlands, and the presence of native vegetation. Disruption of any of these components can dramatically reduce wildlife diversity.

Ecosystem degradation affects all of these factors.

A healthy ecosystem results from a complex mix of decomposition cycles, nutrient circulation,

soil systems, hydrology, and energy flow. Each of these processes may be analyzed at the

smallest (chemical) level or on a grander scale, encompassing physiographic areas. Regardless

of scale, we can trace current ecological degradation to several long- and short-term humaninduced

mechanisms of change.

One of the most devastating causes of ecological degradation is fragmentation resulting from

new developments and roads. The results of development are known to anyone with a backyard,

but they should still be documented. Fragmented forest and wetland habitats have more

predation, more parasitism, and less vertebrate diversity than intact habitats. Overall, the

productivity and ecological stability of the land suffers significantly. Edge effects from

development and roads are not restricted to areas immediately adjacent to the edge. Overhead

pictures of roadways show that visible forest degradation extends for 600 meters from the

borders of major roads.

Roadways and other impervious surfaces that go along with development produce dramatically

increased water runoff. Increases in impervious surfaces ? now 10% of New Jersey land ? have

resulted in erosion and flooding that eliminate vernal pools and species reliant on them. Less

directly, flash floods remove food sources and nutrients from the water and correspond with

decreasing groundwater recharge. Less water feeds streams, lakes, vernal pools and vegetation.

Parched ground increases plant mortality, decreases plant diversity, and further impacts the

ecological cycle.

Runoff from developed areas also carries contaminants into neighboring ecosystems. These

substances, combined with larger-scale air and water pollution, heavily impact native plants and

animals, leading to a further reduction in diversity.

Native plants and wildlife suffer additional damage from invasive species. Introduced

earthworms can change forest nutrient cycles, impacting plant communities. In many forests,

invasive plants are outcompeting natives and becoming the abundant forest vegetation. These

non-native plants alter forest structure and provide less food for native wildlife. Domestic cats

prey heavily on wildlife, particularly birds and small mammals, and compete with native

predators. All of these exotics directly or indirectly reduce wildlife diversity.

Even native species can have dramatic negative effects under altered conditions. As forest land

has been fragmented, deer density has increased; deer are now a major destabilizing force in

New Jersey forests. When population density exceeds ten deer per square mile, plant diversity

begins to decline. In some New Jersey locations, there are now as many as one hundred deer per

square mile. Superabundant deer virtually eliminate certain shrub layers. Under these

conditions, forest structural complexity drops and invasive plant species that tolerate or resist

deer browse become abundant. Native plant species, upon which wildlife depend, become

scarce.

Strategies for forest wildlife conservation should bring together good science, planning, and

opportunity. Carefully conducted scientific studies are needed to determine wildlife distribution

and abundance, landscape and habitat needs, and productivity and survivorship of the plant and

animal life. Strategies can then be developed that involve land acquisition and work with land

managers and cooperative landowners. The large scale at which ecological degradation affects

ecosystem integrity and wildlife diversity necessitates such broad solutions.

Several steps are often ignored in attempts to restore wildlife. A restoration attempt should focus

on a select site and one or a few species. It is important to ascertain why the selected species are

currently absent and whether they will survive and reproduce if a seed population is supplied.

Precautions should be taken to ensure that the species are not overly successful to the detriment

of other ecological aspects. Once species are restored, monitoring is necessary to assure their

long-term success and to produce data for future efforts.

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