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Beaver Lake Realty Company
Mr. Wade Brigham

This letter is in response to the Forestry Management Plan being proposed within the watershed and surrounding woodlands of Beaver Lake. The following proposed management stands are within or on the boundary of Beaver Lake watershed: Stands 27, 28, 29, 30 and 32.

If temporary logging roads are proposed to connect the access from the paved roads in the Beaver Lake Community to Stands 27, 28, 29, 20 and 32, these roads are going to be built within the watershed of the lake. The cutting of trees, and/or removal of vegetation to build these roads would expose the organic litter layer and soils of the woodlands and increase the chances of water flow during rain events. Soil erosion and the introduction of sediments on roads from both erosion and vehicular travel may increase the chances of external loading of phosphorus and nitrogen, total dissolved solids, total suspended solids, and turbidity entering the lake. Our recommendation is not to access these Stands from the roadways within the Beaver Lake Community.

Written within the Forestry Management Plan, pages 65 and 66 respectively, Stands 28 and 29 are considered **not** to have within these stands "Unique and/or High Conservation Value Features." Stands 28 and 29 border on the main inflow stream entering Beaver Lake located on the southeastern portion of the lake. Also stated, "Stand 29 includes a wetland with a stream which may limit operability to the winter months." Stands 28 and 29 should be considered to have a high conservation value and any logging operation occurring within these Stands will have a direct impact, on adversely affecting the water quality entering Beaver Lake from this inflow stream. Our recommendations are to have minimal or no mechanical harvesting activities in these Stands. If any forestry management is implemented, the work should exceed all buffers as stated in the Stream Management Zones (SMZs) section in the 1995 Forestry and Wetland Best Management Plans Manual.

Stand 30 has Unique and/or High Conservation Value Features: “Wetlands are present in the southwestern portion of the Stand. Some are larger than labeled on the map likely due to beaver activity”. Stand 30 partially surrounds the watershed and wetland that directly flows into Beaver Lake on the western shoreline. This Stand should be considered sensitive and any logging operation occurring within these Stands may have a direct impact, both short term and long term, on the water quality entering Beaver Lake. Our recommendations are to have minimal or no mechanical harvesting activities in these Stands. If any forestry management is implemented, the work should exceed all buffers as stated in the Stream Management Zones (SMZs) section in the 1995 Forestry and Wetland Best Management Plans Manual.

AAI’s concerns on this proposed management plan are the references made in the 1995 NJ Forestry and Wetlands BMP Manual, Page II. “Forestry Best Management Practices Guide Manual, commonly referred to as BMP’s, are designed to minimize soil erosion, protect water quality by preventing non-point source pollution, enhance fish and wildlife habitat and improve recreational opportunities. A BMP, as defined by the Clean Water Act of 1987, is any method, measure or practice used to protect, maintain and preserve water quality.”

The manual appears to be a general guide that addresses some issues in protecting waters impacted from forestry operations but it is generalized. There are no threshold limit concentrations set for nitrogen, phosphorus, total dissolved solids, total suspended solids, and turbidity. Increases in concentrations within these parameters from logging operations may degrade the water quality entering Beaver Lake. I feel that a water quality monitoring program should be developed to monitor the forestry management operations proposed prior to any implementation of this logging management project. With the current plan, there is no way to monitor if the proposed Best Management Plans put forth in the manual will actually preserve and protect the waters that will be impacted by this forestry management project.

Page 63 of the “Forest Stewardship Plan Sparta Mountain Wildlife Management Area proposal states, “ With only minimally successful strategies to mitigate the effects of HWA, the introduction of a surrogate alternate softwood species may be the only solid short term option to continue providing conifer habitat at SMWMA.”

AAI’s recommendation is to consider implementing an integrated pest management (IPM) plan including both chemical and biological control agents. These systemic pesticides, along with the biological control agents can be selectively applied and introduced to Hemlocks to save some of the trees within the watershed of Beaver Lake. This may reduce the impacts of mechanical harvesting of Hemlocks in sensitive wetlands and riparian zones. The selective use of both pesticides and the biological control agents may increase the costs of the management plan. However, these costs are monetary compared to the cutting of trees, development of logging roads, and employment of BMP’s for logging in and around the wetlands and waterways. This stewardship Forestry Management Plan is taking a one-way approach in managing the Hemlock Woolly Adelgid, and the outcome proposed may not attain the goals of the plan.

It appears that the overall goal for this Forest Management Plan is biodiversity. I understand that this is a Wildlife Management Area but as stewards of the lands, it is our responsibility to preserve and protect all the resources in the State of New Jersey.

Respectfully submitted,

A handwritten signature in cursive script that reads "Larry Kovar". The signature is written in black ink and is positioned above the printed name.

Larry Kovar, President, CLM