February 16, 2016

NJ DEP Division of Fish & Wildlife
ATTN: Bureau of Land Management
805 Pequest Road
Oxford, NJ 07883

To whom it may concern:

The New Jersey Division of the Allegheny Society of American Foresters thanks the DEP Division of Fish and Wildlife for the opportunity to comment on the Sparta Mountain Wildlife Management Area (SMWMA) Forest Stewardship Plan. Our membership consists of over 100 foresters, who work for a wide variety of employers, including state forestry agencies; state and county park systems; urban and community forestry; research and academia; nonprofit conservation organizations including forest policy and wildlife-focused organizations; and consulting foresters, who work with large forest landowners, farmers, corporations, hunting clubs, and nonindustrial private forest landowners. A thorough and professional review of the SMWMA Forest Stewardship Plan (hereafter “the Plan”) has been conducted resulting in the following conclusions.

First, it is clear from the Plan that our organizations have a shared perspective: that the oak-dominated forests of the New Jersey Highlands are dynamic, disturbance-dependent ecosystems. SMWMA, in particular, is a critical reservoir of biodiversity that must be maintained through prudent disturbances that either mimic the natural disturbances that caused these forests to develop over time, or allow the proper functioning of ecological processes in a changing world. We support the numerous references to the ecological principles as work on this WMA, including fire (or disturbances that mimic prescribed fire), and the resulting changes in light levels reaching lower into the forest structure and effects on species composition.

The landowner goals and objectives are (1) well defined, (2) broad-based, (3) reflect a landscape-scale viewpoint, (4) are attainable, (5) and are in compliance with and follow both the Forest Stewardship Council (FSC) and Montreal Process criteria and standards.

The Plan provides appropriate considerations for SMWMA’s hydrologic features, by meeting or exceeding New Jersey forestry and wetlands Best Management Practices. It further addresses in detail the protective measures to be utilized when implementing prescribed practices and the use of detailed practice plans describing those practices and the protective measures to be utilized in detail.
The Plan gives an excellent description of rare, threatened, and endangered faunal and floral species, and provides a thoughtful series of considerations in regards to improving or avoiding harm to their habitat. We specifically note the large degree of attention to identifying locations of rare and endangered plant occurrences during the inventory stage of this Plan. The description of the use of Representative Sample Areas to conserve those species was excellent.

On a related topic, we further note what we believe to be an extraordinary amount of detail to planned activities to prevent or control the spread of non-native invasive plants. Here, the collective knowledge of NJ Audubon and Division of Fish & Wildlife is apparent, based on positive results of recent forestry activities to benefit wildlife populations. These results – the large number of imperiled, rare, and uncommon species of wildlife using recently created habitat areas, and the low amounts of exotic invasive plants present therein – are worth highlighting to a larger extent in this Plan.

Additionally the Plan addresses the socio-economic impacts and natural resource sustainability of the Plan as they relate not only to SMWMA and its surrounding area but also to all publically owned lands. We do note, however, that consideration of socio-economic conditions is a requirement of FSC certification, not of Forest Stewardship Plans prepared for public or private lands.

Our review reveals that the SMWMA Forest Stewardship Plan meets and exceeds both the State and Federal standards for the preparation of these Plans. Based on these factors we endorse this Plan and recommend its implementation as a means of providing a model of good forest and land stewardship.

Yours in conservation,

The New Jersey Division of the Allegheny Society of American Foresters

Mission Statement
The Society of American Foresters (SAF) is the national scientific and educational organization representing the forestry profession in the United States. Founded in 1900 by Gifford Pinchot, it is the largest professional society for foresters in the world. The mission of the Society of American Foresters is to advance the science, education, technology, and practice of forestry; to enhance the competency of its members; to establish professional excellence; and, to use the knowledge, skills, and conservation ethic of the profession to ensure the continued health and use of forest ecosystems and the present and future availability of forest resources to benefit society. SAF is a nonprofit organization meeting the requirements of 501 (c) (3). SAF members include natural resource professionals in public and private settings, researchers, CEOs, administrators, educators, and students.