



VIA FAX
3 PAGES.

April 29, 2015

Highlands Water Protection and Planning Council
ATTN: 2014 RMP Monitoring Program
100 North Road (Route 513)
Chester, NJ 07930-2322

Chairman Riley:

We respectfully submit the following comments in response to the New Jersey Highlands Council call for input on the Regional Master Plan review. The undersigned individuals and organizations represent a wide variety of interests and opinions yet we are collectively bound by a desire to see a healthy and functioning forest system throughout the Highlands region that provides habitat for wildlife, a clean and plentiful source of water, enhances recreational opportunities for landowners and the public, and supports the economy of the region and beyond. While the Highlands Council and Regional Master Plan play a supportive role in forest stewardship and conservation there are certain principles that we feel could be better represented in the Highlands Council Regional Master Plan and associated Technical Reports.

Our shared perspective on a healthy forest in the highlands region includes several grounding principles. First, we understand that the oak-dominated forests of the New Jersey Highlands are dynamic, disturbance-dependent ecosystems. These forests are critical reservoirs 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. Through the maintenance, stewardship and conservation of the forests of the New Jersey Highlands we will maintain and enhance the water resources of the region, providing filtration and ground water recharge, among other water benefits.

Second, private forest landowners own a significant portion of the total forested land area of the Highlands (most ownership less than 35 acres). Particularly when guided by experts through USDA Natural Resources Conservation Service programs, or other programs administered by conservation agencies, organizations and professionals, these landowners have been good stewards of their healthy forests.

Third, we consistently seek a path forward for keeping our forests healthy and green. The vast majority of on-the-ground work is accomplished in accordance with written management plans prepared by natural resources professionals, and are approved by the NJ Department of Environmental Protection's (DEP) State Forestry Services. So long as such a plan is based on the best available science, we seek to promote examples of good stewardship to the general public and to policymakers.

We offer the following comments in regards to the monitoring program for the Regional Master Plan:

1. Land use change is the most important regulatory focus of the Highlands Council and should remain so into the future. Conversion of land out of forested and agricultural use to developed land cover (*i.e.*, impervious surfaces, buildings and structures) causes significant impacts to water quality, ecosystem function, agricultural viability, recreation opportunities, historic and cultural resources, wildlife habitat and aesthetics. We ask the Council to continue its focus on

land use planning and leverage existing conservation programs and resources to ensure the conservation of the forest lands of the region.

2. Throughout the planning process for the current Regional Master Plan, the assembled Technical Advisory Committees of the Council clearly stated that the Highlands was and is a dynamic ecosystem and landscape – not wilderness – and should be managed accordingly. This view was established by way of consensus of the assembled Technical Advisory Committees called together by the Council on March 28-29, 2006 for a charrette. That vision remains unfulfilled nine years later, and any updates to the Regional Master Plan should reflect a view of Highlands forests as dynamic, disturbance-dependent ecosystems – at least when considering sustainable forest management and wildlife habitat management.
3. Some of our organizations were members of the Sustainable Forestry Technical Advisory Committee, which worked diligently to create a technical report for the Council. The Council attempted to merge the findings of the Sustainable Forestry Technical Advisory Committee into the Ecosystem Management Technical Report that was part of the original Regional Master Plan. As this was done a document was published that was inconsistent with aspects of the Sustainable Forestry report. (While many of our concerns in the Sustainable Forestry Technical Report have been addressed by DEP in the ensuing years, many issues remain outstanding.) It is essential that these issues be clarified and that a single Technical Report is issued.
4. Our understanding of the interactions between sustainable forest management and wildlife habitat and populations (including rare, nongame, and game) has increased since the development of the current Regional Master Plan. While much of this is the result of new research in the fields of forest ecology and wildlife management – both in fundamental research and in applied research such as publication of best management practices and habitat management guidelines – much of this understanding is a direct result of increased collaboration between foresters, wildlife biologists, and agricultural resource specialists. We believe that monitoring of the goals and indicators of the Regional Master Plan should be informed with the best available science. Our organizations stand ready to assist in that respect.
5. Section 30(a)7 of the Highlands Water Protection and Planning Act exempts forestry practices conducted in accordance with a forest management plan approved by the DEP State Forester from “...the act, the regional master plan, any rules or regulations adopted by DEP pursuant to the act, or any amendments to a master plan, development regulations, or other regulations adopted by a local government unit to specifically conform them with the regional master plan.” With this provision, the authors of the Act reaffirmed that NJ DEP State Forestry Services is the sole regulator of forestry activities and plans. Forestry remains regulated by the NJ Freshwater Wetlands Protection Act and the NJ Flood Hazard Area Control Act, in addition to the Farmland Assessment Act and the NJ Forest Stewardship Act. Activities found to be outside of an approved forest management plan could – and, more often than not, should – result in penalties under each of those acts as well as the Highlands Act. The Council has an opportunity and role in promoting and communicating NJ State Forestry Services as a resource for landowners to maintain and steward the forest lands of the Highlands Region. Outreach conducted by the Council could specifically include promoting efforts to maintain healthy forests (particularly in developing resiliency and adaptation to global climate change), advocating management of over-abundant deer, providing habitat for imperiled species and other habitat specialists, control of exotic invasive species and improve forest understory conditions, maintain functioning markets

for forest products, and maintain a variety of forest stand age classes across the landscape to keep common species common.

6. We believe that the following indicators are crucial when evaluating the effectiveness of the Regional Master Plan:
- Total forested and agricultural acreage
 - Forest stand age class distribution, where concentration among any one age class at the expense of creating young forest over time is undesirable
 - Forest cover types over time, where conversion – even through benign neglect – of oak-dominated forests to northern hardwood forests is undesirable
 - State and federal estimates of populations of threatened and endangered species segregated by habitat specialization, and their trajectory over time
 - Average forest patch size, where young forests are included in the forest patch but not utility rights-of-way 150' wide or wider
 - Number of forest patches that include core forest, defined as interior forest at least 300' from the nearest edge
 - Acres of forest mortality, including areas where more than 50% of the forest canopy has been killed by pests such as gypsy moth, emerald ash borer, and hemlock wooly adelgid or fire
 - Localized, accurate measures of deer abundance
 - Estimated number of acres capable of growing advance oak regeneration, given light conditions and understory quality
 - Estimated percentage of the above acreage with oak regeneration greater than 3' in height or ~10,000 ft/acre of aggregate oak regeneration height, thus serving as a proxy for deer damage to forested ecosystems
 - Number of local governments with approved Community Forest Management Plans
 - Urban and community forest cover within such municipalities
 - Total numbers of trees planted, pruned, and hazard trees removed under those Community Forest Management Plans

We thank the Highlands Council for the opportunity to provide comment on the Regional Master Plan and would welcome the opportunity to engage directly with Council staff in order to advance our shared goal of maintaining a healthy and functioning forest system throughout the Highlands region.

Yours in Conservation,

New Jersey Division of the Allegheny Society of American Foresters

New Jersey Chapter of The Wildlife Society

National Wild Turkey Federation

Greg Daly, Chair, NJ Tree Farm Committee

John Cecil, Vice President for Stewardship, NJ Audubon

Brian Cowden, State Council Conservation Chair, NJ State Council of Trout Unlimited

Richard Conley, President, NJ Forestry Association

Anthony Mauro, President, NJ Outdoor Alliance

Jim Desaye, Chair, NJ Chapter of the Ruffed Grouse Society

Miriam Dunne, Regional Director, Forest Guild

Ryck Suydam, President, NJ Farm Bureau

John Rogalo, Chairman, NJ State Federation of Sportsmen's Clubs

Mike D'Errico, Executive Secretary, NJ Arborists, Chapter of the International Society of Arboriculture