

APPENDIX



New Jersey Audubon
Government Relations
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March 15, 2023

NJ Senate Environment and Energy Committee
NJ Assembly Environment and Solid Waste Committee
Trenton, NJ

Dear Esteemed Members,

Thank you for this opportunity to provide additional comments from the Feb 22, 2023 Joint Hearing on the report from the NJ Forest Stewardship Task Force (NJFTF). It was my privilege and civic duty to serve as co-chair of the Senate-appointed NJFTF. I hope that our co-chair presentation provided you with valuable information on which to base future legislative action.

Our recommendations were supported by two-thirds of participants. Currently, a subgroup of the task force – Invasive Species Subgroup – continues working with legislative staffers, industry representatives, and government agencies to move forward on Recommendation 13 to re-convene the NJ Invasive Species Council and to support Senate Bill 2186.

There were several questions and comments made during the hearing that I would like to address now to ensure that Members have up to date and accurate information on which to base decisions.

One comment that was raised often during our meetings and again at the joint hearing is that many stakeholders erroneously thought that the task force would review and deliberate scientific literature. As mentioned at the hearing, this was a stakeholder process, not a technical peer review group. While some professionals and academics participated in the process, most of the participants were not experts. An expert panel operates differently from a stakeholder group. The role of the forest task force was to identify areas of consensus among stakeholders where they existed and to make recommendations based on those areas. It was not to deliberate forest science and ecology.

Regarding the question of how much public land is forested, this information is publicly available on the NJDEP website which provides statistics regarding forest and wildlife management plans and the tools and techniques used to reach the goals in those plans, especially cutting trees.

The question of how frequently cutting is used as a management tool on state lands, the New Jersey Forest Service monitors and maintains 837,230 acres of state-owned open space. According to 2019 data on forests in NJ by the US Department of Agriculture Forest Information (Attachment 1), NJ has 1,988,517 acres of forest land. Of this, 46% is privately owned, 6% is federal lands, and 58 percent is owned by the state and local government. Annually, approximately 2,011 acres of all forest land are managed with techniques that include selective cutting and 4,122 acres of nonforest land revert back to forests annually. That is **0.1%** of all NJ's forested lands have some type of cutting technique used to fulfill its forest or wildlife management plan goals. For state or local government owned lands (1,153,340 acres) that is **0.17%** of NJ's public forested lands utilizing cutting as a management tool to reach ecological goals.

CURRENT PROJECTS – All of these projects have some silvicultural thinning or shelterwood harvest which involves selective cutting to open the canopy and allow regeneration of important tree species like mixed oaks and pines.

- Brendan T. Byrne Magnolia Road Shelterwood
- Brendan T. Byrne State Forest Emmons Field Thinning
- Brendan T. Byrne State Forest Goose Pond Thinning
- Brendan T. Byrne State Forest Shortleaf Pine Restoration
- Double Trouble State Park Rare Species Habitat
- Double Trouble State Park Natural Resource Stewardship Plan
- Stokes State Forest Hemlock Restoration Project
- Stokes State Forest Oak Regeneration Project
- Wharton State Forest, 563 Thinning
- Wharton State Forest Washington Turnpike

PREVIOUS PROJECTS – Various management techniques such as cutting, fencing, salvaging (Atlantic White Cedar) and invasive species control. Brendan t. Byrne Red Headed Wood Peck Sites

- Delaware & Raritan Canal State Park Emerald Ash Borer and Restoration Project
- Double Trouble State Park Superstorm Sandy Cedar Salvage
- Hacklebarney State Park Superstorm Sandy Recovery
- Swartswood State Park Preventative Ash Removal
- Washington Crossing State Park Emerald Ash Borer Infestation

Some commenters confused forest management plans with other types of projects managed by NJDEP. NJDEP maintains a website listing all project on public (and private) lands (see below). These projects incorporate tools such as mowing, plantings, tree harvests and other activities on state Wildlife Management Areas to enhance habitat to favor various species, often ones which are in decline (such as bobwhite quail).

Wildlife Management Area Habitat Projects

- Assunpink WMA: American Woodcock Early Successional Habitat Project
- Assunpink WMA Habitat Project: Tree Plantings
- Assunpink WMA Wildlife Passage System
- Maintaining Young Forest Habitat at Flatbrook WMA
- Great Bay WMA Terrapin Habitat Project
- Manasquan WMA: Wildlife Food Plots
- Sparta Mountain WMA Forest Stewardship Plan Implementation
- Stafford Forge WMA: Field Creation for Early Successional Habitat
- Winslow WMA – Field Habitat Creation

Wildlife Management Area Habitat Restoration Projects

- Capoolong Creek WMA Streambank Restoration
- Kenco (Pequest WMA) Wetland Restoration and Enhancement Project
- Paulinskill River WMA Hyper Humus Restoration
- Pequest Wetland Restoration Assessment Project

- [Pond Creek Marsh \(Higbee Beach WMA\) Restoration](#)
- [South Branch WMA Habitat Restoration](#)
- [South Branch WMA \(Merck Tract\) Habitat Management Project](#)
- [Sparta Mountain WMA Forest Management Updates and Upcoming Activities](#)
- [Stafford Forge WMA, East Plains Natural Area: Broom Crowberry Habitat Restoration](#)
- [Aerial Seeding Operations at Tuckahoe Wildlife Management Area](#)
- [Tuckahoe WMA Impoundment Restoration Project Video](#)
- [Whiting Natural Resource Stewardship Plan](#)

Stewardship Plans

- [Sparta Mountain WMA Forest Stewardship Homepage](#)
 - [Sparta Mountain WMA Forest Stewardship Plan](#)
 - [Addendum to the 2017 Sparta Mountain WMA Forest Stewardship Plan](#)
 - [Sparta Mountain WMA Habitat Management Video](#)
- [Greenwood Forest WMA Forest Stewardship Plan](#)
- [Whiting WMA Natural Resource Stewardship Plan](#)
- [Weldon Brook WMA Forest Stewardship Plan](#)
 - [Forest Management Activities At Weldon Brook WMA To Benefit Imperiled Species](#)

Bobwhite Quail Habitat Management

- [New Jersey Northern Bobwhite Action Plan](#)
- [2012 Quail Action Plan Landowner Survey Results](#)
- [Bobwhite Basics Brochure](#)
- [Northern Bobwhite Restoration Initiative](#)
- [National Bobwhite Conservation Initiative](#)
- ['Bobwhites on the Brink' Examines Decline, Restoration Effort for Iconic Native Bird](#)
- [Northern Bobwhite Projects](#)
- [2013 New Jersey Quail Calendar](#)

Some participants conflated selective cutting and thinning techniques with "clear cutting" and "logging." These latter terms are highly inflammatory and conjure images of barren moonscapes across the horizon. In fact, in instances where cutting is utilized in a management plan, older trees are left behind and selected trees are harvested to open the canopy and allow growth of seedlings for a more robust forest ecosystem (including wildlife, which was often a forgotten entity during task force discussions).

Thank you for the opportunity to provide additional comments on the task force presentation. I am available to address any concerns and answer questions you may continue to have.

Sincerely,



Eileen Murphy, Ph.D.
Vice President, Government Relations

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Attachment 1: Forest of NJ, 2019



Forests of New Jersey, 2019



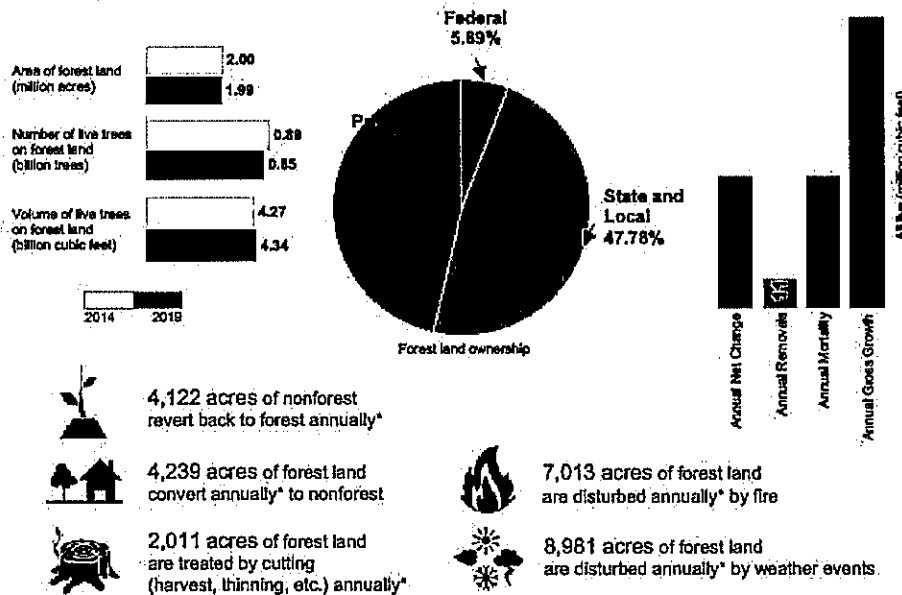
40% forested*

New Jersey has an estimated 1,988,517 acres of forest land.

* Percent forest is forest area/total area. Percent forest with water removed from total area is 42%.

This resource update is a brief look at some of the basic metrics that describe the status of and changes to forest resources in New Jersey. This information is based on field data collected using the USDA Forest Service Forest Inventory and Analysis (FIA) annualized sample design, and it is updated yearly.

New Jersey has 1,532 sample plots across the State, of which 715.0 are currently forested. Each year, about 10-20 percent of these plots are visited and measured by field crews. Data used in this update were accessed from the FIA database on 09/17/2020.



USDA Forest Service - Forest Inventory & Analysis

The estimates presented are based on data retrieved from the FIA database (09/17/2020) and may not reflect the most recent data available from the FIA program. Note - this publication does not include estimates of uncertainty. The most current data and sampling error for the estimates above can be found by visiting <https://www.fia.fs.fed.us/>.

*Average annual estimates are based on data collected across 5-10 years and may not be indicative of the nominal year presented in the title by itself.

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NATURAL HERITAGE COMMITTEE

STATEMENT OF PRINCIPLES ON FOREST MANAGEMENT AND RESTORATION FOR PUBLIC LANDS

Introduction

New Jersey is facing increasingly damaging climate related events. New Jersey is one of the fastest warming states and one of the most vulnerable to flooding. As NJDEP Commissioner LaTourette stated in the aftermath of Hurricane Ida, "New Jersey is ground zero for the worst impacts of climate change — period." As part of its plans to mitigate this threat the GWRA plan calls for a 33% increase in carbon sequestration by 2050. Achieving this goal will be challenging. The GWRA 80x50 Report states, "*This optimistic projection, however, would require the use of all currently available open space for sequestration, requiring a major transition in New Jersey's current land use laws and practices.*" (p. xix) (emphasis added).

A significant portion of this increase will have to come from public forests. Unfortunately, these forests are under attack today by insects, deer, invasive plant species and special interests who are clear-cutting a significant acreage of public lands, based on questionable claims regarding the need to protect selected species, defend against climate change and mitigate carbon loss. In addition to actually reducing overall carbon storage and carbon sequestration capacity these threats also imperil our drinking water, increase flood risks, reduce biodiversity and diminish the use of our public lands for recreation.

New Jersey has no policies or regulations to address these threats to our public lands. We are inappropriately applying regulations promulgated to discourage the development of private forests to manage public lands, resulting in the logging of public forests. Specific policies must be based on clear priorities for public forest management such as maximizing carbon storage and sequestration and the most current peer-reviewed science. We need a better approach, based on the principles of *ecological restoration* as the standard for stewarding and managing public forest lands and to maximize carbon sequestration and we must end the extraction of timber and wood products for virtually any purpose. Stewardship plans must incorporate a transparent stakeholder process; require comprehensive inventories of rare flora and fauna; identification of regulated environmental features such as riparian corridors; and include broad interdisciplinary oversight. In order to ensure these policies are followed they need to be mandated by legislation.

New Jersey Highlands Coalition, as recommended by its Natural Heritage Committee and by New Jersey Forest Watch, propose fundamental principles to guide the development of new legislation and regulations for the stewardship and management of publicly owned forested lands.

The people of New Jersey highly value its public open spaces and in particular, intact forests. Preserved forests are essential parts of a healthy environment providing a number of ecosystem services, including a plentiful supply of clean drinking water and climate change mitigation. Further, public forests offer us abundant opportunities for accessible outdoor recreation, greatly benefiting our physical and mental health. In many cases, forests provide the only viable habitat for a range of wildlife species, including many that are rare, threatened, or endangered. Legislation including the Pinelands Protection Act and the Highlands Water Protection & Planning Act were enacted in large part to protect the ecosystem services of the natural landscape. And the State and many counties and municipalities continue to vigorously purchase open space, regularly increasing the statewide inventory of protected open space.

Current, peer-reviewed science shows that older, larger trees and established maturing forests absorb and store greater amounts of carbon per acre compared to younger forests and continue to do so for hundreds of years. Furthermore, New Jersey's maturing deciduous forests that have remained relatively undisturbed in the last century represent an enormous potential for sequestering carbon over the next century. Outside of the Pinelands, the most productive option for maximizing carbon sequestration is to allow our maturing deciduous forests to continue to mature on their own. If our priorities for managing public lands are to promote biodiversity, maximize carbon sequestration and to ensure the sustainability of the ecosystem, we must *discontinue* the mechanized harvesting of timber from preserved, maturing forests.

Before moving on to specific recommendations for managing public lands in New Jersey, it is important to recognize that the current practice of forest stewardship represents a wide range of activities, from innovative restoration projects, to veiled timber harvesting projects that claim conservation objectives as a disguise to access the valuable timber stock thriving on protected public lands or are based on false narratives such as our forests being at risk from too much carbon and therefore needing thinning. In other instances, the rubric of forest stewardship is misapplied to justify projects that manipulate environments to benefit a single interest. In the development of a framework for the management of public forest lands it is critical that projects without a sound ecological justification be prohibited, such as extracting wood for commercial sale from public lands or manipulating a forest stand's structure to favor a single game species instead of true biodiversity across all species in all types of forests. Instead, new procedures and criteria are required to ensure projects on public lands are in the public's interest and always uphold the public's trust. Standards and regulations to protect other natural resources present on a site must be followed and enforced. This new procedure must consider which practices are appropriate and scientifically justified on public lands, and limited to forestry restoration activities that promote biodiversity, maximize carbon sequestration and ensure the sustainability of the ecosystem.

A major issue in New Jersey today is the cutting or thinning of trees in intact forests outside of the Pinelands. This practice releases most of the carbon stored in harvested trees and compromises a forests' effectiveness to further sequester carbon. Recent studies have shown that logging sites become net carbon emitters for decades before enough regrowth is present to again become a carbon sink.

Logging a site reduces biodiversity and disrupts habitats and natural systems on a much larger scale than the actual area of disturbance. It is imperative that any legislation developed under these principles mandates strict guidelines to prohibit board/feet considerations from influencing forest stewardship plans. Removal of trees must be limited to circumstances when there is an unequivocal ecological objective and a clear conservation goal (e.g., to remove a pathogenic threat, or to quarantine a pest infestation), or as part of the development of structures that directly support the public's use of the park. As already occurs in the Pinelands under the Comprehensive Management Plan, timber removal requires regulatory review and permits. Outside of the Pinelands a specific permit should also be required, and no timber or wood product should be removed from the site unless for quarantining purposes. Leaving felled trees on site provides habitat for a succession of bird, amphibian, insect, fungi and microbial species. Further, use of heavy machinery should be highly restricted and less intense methods such as girdling, which replicates a natural process, should be employed whenever practicable, when the felling of trees is required and justified.

Most regulations protecting environmental and natural resources are essentially compromises, written in such a way as to not overreach to the extent of trampling private property rights, which are constitutionally protected. Private property rights are not a consideration on publicly owned lands. Maximum protection of the natural resource values provided by public lands—preserved precisely because of their natural resource values—must be the standard. Exemptions from regulations that are written to prevent a claim of a regulatory taking of private property simply do not apply on public lands.

We will support legislation that is in accordance with the principles stated here and informed by current forest and climate science, ecology and observations by experts focused on New Jersey with an aim to protect and steward the state's treasured and limited public forests. At the core of this proposal is the urgent necessity for New Jersey to promote ecological restoration of public forests and to end extraction of timber from public forests. To this end, we recommend the establishment of *Ecological Restoration Plans* as a framework to guide practices that address major problems in New Jersey's public forests, which are: the need to maximize carbon sequestration; the control of overabundant deer populations that are decimating the forest understory and inhibiting the natural regeneration of the forest; removal of non-native plant species invading public forests; promoting biodiversity; water production and filtration; air filtration; and compatible outdoor recreation; and the protection of cultural resources. *These are the necessary objectives if the goal is to protect the public's investment in these forests.*

The procedure for developing and implementing *Ecological Restoration Plans* must be by nature interdisciplinary in order that the full suite of natural and environmental resources present on a proposed site are identified and appropriately protected. Comprehensive inventories of flora, fauna and regulated environmental features must be required before a project proposal is written to ensure it is meeting the needs of that particular site and its ecosystem, and that the stewardship activities do not sacrifice any one ecological component in favor of another. This procedure must also include robust and meaningful stakeholder engagement with the public. This will inform the plan's objectives based on local use, local knowledge and expertise, while also eliciting community support for projects to ensure that the public's trust is upheld.

Statement of Principles

- When drafting a legislative framework through which New Jersey protects its public forest lands, we urge the Legislature to start with a findings report of the existing documented threats and emerging concerns for the State's forests. An evaluation of the conditions of forests held by state, county and local government units. The legislative findings report should characterize distinct forest regions in the State as well as the evolution of these regions, including the effects of the deforestation from charcoaling, land clearing and agricultural development and the qualitative differences in forest integrity, such as between forests with undisturbed soils and post-agricultural forests. Such a study should also include an assessment of carbon stocks and the potential maximum carbon tonnage. New Jersey's forests cannot be characterized as one ecosystem, and a one-size-fits-all approach will render any framework or legislation insufficient.
- It is imperative that local government units and land managers be encouraged to develop and implement plans that restore public forest lands. Sources of financial assistance and incentives should be investigated and discussed. The NJDEP could be tasked with helping local government units locate grant funding and interested non-profits or academic institutions with qualified expertise might be enlisted to support this outreach.
- Logging or the removal of any wood product should not be permitted on public lands, except when absolutely necessary to address a documented threat to health and safety, to remove a pathogenic or insect threat, or as part of an ecological restoration project under the jurisdiction of the Pinelands Commission, or for the development of structural amenities that directly support the public's use of the park. The majority of New Jersey's public forests were acquired for preservation and the protection of the natural resources on that land. The commercial sale of timber extracted from public forests contravenes the public trust and runs completely counter to the intended protection of the natural resources on these lands.
- To maximize climate resilience no wood or forest products shall be removed from publicly owned forests. All woody material must be left in the forest as habitat and as carbon sequestered in soil. Invasive, or infected plants, or those that pose a hazard must be managed on site rather than moved and disposed of elsewhere.
- New Jersey must increase its overall carbon sequestration rate by 33% by 2050 if we are to meet our Global Warming Response Act (GWRA) objectives. To meet this critical objective, we must retain as much existing carbon storage as possible and greatly increase sequestration capacity to overcome constantly increasing development pressures. While planting trees in previously disturbed areas is welcomed, this is far less effective than preserving maturing and old growth, which must be the priority. The current and potential carbon storage in our public forests must be quantified.
- One of the most significant pitfalls with the current procedure for preparing Stewardship Plans for public land is that their design and approval is carried out almost exclusively by foresters whose training and expertise is generally restricted to traditional forestry, without requiring an understanding of ecology. Traditional forestry prioritizes a forest's timber productivity. Ecological Restoration Plans on public land should be developed and approved by an interdisciplinary council that includes a diverse expertise related to forest sciences and

interested members of the public. This may include ecologists, a botanists, a wildlife experts, Certified Ecological Restoration Professionals or other qualified persons. Individuals or parties with financial interests in the Stewardship Plan may not participate (a recently approved Woodland Management Plan for a municipal forest in Washington Township, Warren County included the provision of 20% of the income from the sale of timber going to the plan's author/manager).

- Habitat creation by clearing forests should prohibited.
- Current inventories of forest stands for the purpose of Forest Stewardship Plans are not sufficient and often irrelevant to the concerns on public land because they do not adequately quantify any values beyond timber production. The federally adopted Floristic Quality Assessment Index (FQI) should be used to identify all species present and to rank their value accordingly as well as recorded on the national FQI database. Simply identifying a site's threatened and endangered species is inadequate. The site inventory should also designate any areas of native soil and identify tracts of forest that have remained undisturbed since the era of second growth (e.g., cultivated soils, abandoned former settlements, etc.).

Non-native species that are identified in the FQI should be addressed in the management recommendations. Replanting should be restricted to species native to that habitat type. While invasive species management is referenced in current Forest Stewardship Plans, interventions to mitigate the spread are rarely implemented. In fact, in the wake of the mechanized logging of a site, invasive species are generally among the first to re-populate the area, being transported by machinery moving through the forest, exploiting the newly exposed soil.

- Overabundant deer populations—which almost always increase after logging due to the newly available forest edge and increased browse—are an urgent threat to the regeneration of our forests and illustrate the deficiencies of the typical objectives of current Forest Stewardship Plans. Deer management is rarely incorporated into such plans. The phenomenon of “empty forests” is evident all across the State and is driven by overabundant deer destroying the understory of the forest, allowing non-native plant species to out-compete native species (this issue persists on private land as well as State owned forests, with very few exceptions).
- Off road vehicles (ORVs/ ATVs) present an ongoing concern on both public and private land. ORV's regularly take advantage of newly cut logging roads in areas where motor vehicles are prohibited, accelerating forest degradation by severely disturbing soils, negatively impacting wildlife and diminishing the visitor's experience. Discouraging access for this activity is not currently required of a Woodland Management Plan or Forest Stewardship Plan.
- Fire Management is especially important in the Pinelands and can be implemented as a useful tool in a variety of environments. Where fire is part of a restoration plan a detailed assessment of potential hazards should be noted and state-of-the-art surveillance technology included, guided by a state-wide Fire Strategies Plan with robust fire-proofing strategies required. Mechanized thinning has been proven to often result in more intense burns, rather than stop fires and should never be used outside of specifically appropriate areas such as

designated sections of the Pine Barrens. There is no justification for setting a minimum acreage for prescribed burns in New Jersey.

- Monitoring of environmental conditions is vital on public land and needs to be expanded. All proposed projects should be available for review and comment online, including regular updates on the results and achievements of implemented restoration plans (not merely activities completed) and serving to inform future projects on similar landscapes or facing similar threats.

The New Jersey Highlands Coalition and the NJHC Natural Heritage Committee wish to have a continuing constructive dialogue towards drafting urgently needed legislation establishing an effective program for the stewardship of New Jersey's treasured public forests, to meet the state's climate and biodiversity objectives and to protect the public's trust and investment in its forests for now and for future generations.

3/10/2023

**Comments on New Jersey Forest Task Force Report and Next Steps
to New Jersey State Legislature**

From Sara Webb, PhD.

swebb@drew.edu

I am a forest ecologist, Professor *emerita* and founding director of the Environmental Studies program at Drew University, with 40 years of research, restoration, and teaching in New Jersey's forests, with a Ph.D. in Ecology and the M.S. in Ecology and Forest resources. I participated in the NJ Forest Task Force. Many excellent recommendations came from the Task Force effort. However, here, with concern, I wish to focus on next steps and specifically on the critical but neglected issue of logging of our public conservation lands.

Forest stewardship of northern New Jersey public lands: Logging is unwise. Unfortunately, the NJFTF report neglects the very issue that motivated the formation of this Forest Task Force: the sharp **acceleration of clearcutting** in northern New Jersey's public conservation lands in recent years, a great threat to forest health and native biodiversity. The forest does not come back. This puts the forest's future at risk, and steeply sacrifices climate resilience in New Jersey. The science is very clear about this. (Note that these comments do not pertain to the pinelands of southern NJ are different with their reliance on fire).

Today's "forest stewardship plans" for northern NJ public lands are logging plans, though the words "logging" and "clearcutting" are never used – just milder terms like habitat management, stewardship, young forest initiative, active management, silviculture, thinning. But these plans typically call for clearing most of a WMA or other public forest over time, one section after another each year. I have visited these stands before and after logging with other scientists, surprised to find our oldest woods are targeted, counting 100-150 years of tree rings on oak stumps showing no decay or disease, finding extensive wide-open clearcuts where younger trees and the future forest were also cleared, finding deep ruts, serious harm to amphibian habitat, soil, and trails widened for logging trucks, and invasive vegetation colonizing the clearings but no native tree seedlings.

Our current harvest-focused management of public conservation lands should change. With New Jersey's dense population and reliance on forests for so many services, science rather than tradition should prevail, in how we manage our forests. And science is very clear about the great importance of our mature intact natural forests: to resilience and protection from climate change, to our water, and to genuinely threatened wildlife.

Instead of logging, thinning, and fragmentation, the appropriate approach for our northern NJ forests is to protect intact them from invasive species and deer, minimize fragmentation, restore lost species, retain large trees, and keep wood in the ecosystem for its carbon and habitat value. Public forested lands in our crowded state are most valuable for their ecosystem services and carbon defense. But the status quo of steadily logging out our mature public hardwood forests is in no way beneficial to but poses risks to forest health and biodiversity. Enormous swaths are being cleared and the wood removed. The consequences:

1. **After logging there is NO PATH back to forest. No young forest returns because of deer and invasive vegetation.** Throughout northern NJ, this is obvious to any observer. If we really need young forest, grow it elsewhere instead of carving up healthy mature forests..
2. **Climate resilience is lost.** Our public forests are our best defense against climate change, absorbing and sequestering the largest volume of carbon at the greatest rate. The Task force discussed the possibility of designating our oldest public natural forests intact as climate reserves.
3. **Biodiversity is lost:** Species of edges and openings have plenty of habitat in New Jersey today, while forest interior species are increasingly uncommon.

Problem #1. No path to future forest: Trees do not grow back after today's DEP stewardship via logging out large swaths of mature forest, aiming to create more young forest, for example, at Sparta Wildlife Management Area, where every year the plan is to continue logging in stages until all has been converted to young forest. But this does not work. Logging does not deliver healthy and vibrant "young forests." On the contrary, after "management" by logging, forests simply do not return after trees are cleared. Any young trees that sprout are choked out by deer and invasive plants that take over, often impairing the soil. There is no path back to forest, in the future. We do not get new strong oaks surviving, and any replanting of trees fails because the young saplings are deer candy. Controlling deer and invasive species is nearly impossible without interventions including herbicides and deer fencing which are very expensive at the forest scale. The young forest initiative just does not work in northern NJ forest types. Logging as stewardship has been depleting old forests with no path back to forest, neither young nor old, in the future. This is wrong for the forest types of northern New Jersey. *Best to keep the canopy of large native trees intact!*

Meanwhile we lose the habitat and carbon storage and water protection of mature natural forests. Yet year after year, more expanses of state forested lands are systematically clearcut. Note that the words logging and clearcutting are never used: this is called habitat management, thinning, silviculture, and forest stewardship, more palatable words but by any name just wrong for northern New Jersey's public forests. Today's focus by DEP on creating more young forest is part of a widespread but problematic approach called the Young Forest Initiative that prioritizes young forest. In New Jersey this means logging and replacing older forests, which logging advocates incorrectly claim are too extensive in New Jersey while younger forests are too scarce. This is not true of northern New Jersey. Meanwhile we have cut down and hauled away hundreds of healthy, very old oaks. We get no tree regeneration but put out the welcome mat to invasive vegetation.

So we should not manage by cutting mature canopy trees. Better policy would be to keep existing natural forests and manage them for forest restoration: controlling deer and invasive species, and returning lost species. Today's DEP focus on creating more young forest is ill advised when it so often involves cutting down our established mature public trees – and again it rarely succeeds at establishing young trees in any case because of deer. Yet this practice is still being advocated in our agencies' stewardship plans and deployed on the ground..

What is truly uncommon and declining in New Jersey (and elsewhere in eastern North America) are healthy natural forests with diverse, mature trees. We have plenty of disturbed ground, old fields and fragments of younger woods overrun with nonnative trees, places where young forest should be planted without sacrificing intact mature forest.

In a different era when growing the deer herd and providing wood supplies were top priorities, this could make sense, before awareness of global warming and the great defense provided by old mature natural forests, before New Jersey's forests were mostly cleared, fragmented and invaded with an empty understory - without habitat for the forest interior species which tend to be our most threatened.

Problem #2: Climate resilience is lost: Today's logging also sacrifices of climate defense which, contrary to confused assertions, is orders of magnitude greater – in carbon uptake and storage, per tree and per acre – for older than younger trees. Today's threat of climate change should be front and center in decisions about public forests, and our older trees and forests provide absolutely essential yet inexpensive climate defense, far more than young tree plantings or the more likely invasive vegetation.

Mature native trees are found in New Jersey chiefly on our public conservation lands where they continuously absorb and store (in their wood and in the ecosystem) enormous amounts of carbon, in proportion to their leaf area, and can live for centuries. They clear the skies (with “negative carbon emissions”) much less expensively than elaborate high-tech installations and will continue to do so for up to 300-400 years for some tree species. There is much misinformation and misunderstanding about this, leading to replacing mature trees with young forest. Although small trees might gain height growth more rapidly, large trees absorb and fix and store **much** more carbon per tree and per acre – in the trees, soil, and ecosystem .

Another key benefit of public forests for climate defense is as a pathway northward for species, from trees to small mammals, to move and survive as their current habitat is lost to a warmer, drier, more fire-prone environment. Future shifts and losses have been modelled and mapped for our tree species by the US Forest Service and The Nature Conservancy, showing northern NJ to be a critical corridor for preventing extinctions.

Thus, harvesting trees immediately decreases our climate defense. Contrary to some claims, carbon is not stored for long in wood products and much carbon is released in transporting, milling, and manufacturing. It is troubling when stewardship and other management plans say that logging helps defend the planet from global warming. This is simply not true.

The Forest Task Force report and process was complex and fruitful. Some concerns:

Some key conclusions misrepresent participants' views. The report presumes a false dichotomy by concluding that participants concerned about climate defense do not care about **ecological health**. But the two go hand in hand, both very important and both are most threatened by the exact same thing: logging in our mature forests.

Climate: The report does not address climate change and fails to prioritize the profound climate defense provided by our mature natural forests, so very critical today, as they take up and store enormous volumes of carbon far into the future.

Logging: Perhaps most important is that the task force report says little about the key issue of logging management. Discussion of this issue which motivated the formation of the task force was very limited..

In Task Force Report conclusions, widespread opposition to today's widespread logging was greatly downplayed. But in a straw poll at the first Task Force meeting, 85% of participants voted against logging of public forests. Subsequent itemized polls revealed great concern about language that would accommodate logging. Yet in the end, logging was not on the ballot and not questioned or discussed in the final report. Little if any of the extensive relevant science about forests and climate was taken into account.

Protecting Wildlife: Another problem with replacing old forest with young is that wildlife species – birds in particular - of older forests have declined most steeply in New Jersey because of habitat loss. For more about the problem with the Young Forest Initiative and with clearing forests for habitat more generally, see:

Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. by Kellett MJ, Maloof JE, Masino SA, Frelich LE, Faison EK, Brosi SL and Foster DR (2023) *Front. For. Glob. Change* 5:1073677. Full text at <https://njhighlandscoalition.org/wp-content/uploads/2023/01/forest-clearing-to-create-early-successional-habitat.pdf>.

Misreading the Vote? At the Joint Hearing of the Energy and Environment Committees, the Task Force leadership incorrectly reported majority approval for logging. However, this tally counted as pro-logging those who would accept logging when needed for “ecological health” (one of four very constrained options offered for vote). This phrase means different things to different people, but surely those individuals and organizations who checked that box envisioned modest exceptions and were not all endorsing today's intensive, block-by-block logging out of wildlife management areas, nor supporting clearance for young forest that will not actually return. By no reasonable definition does logging the oldest trees or removing wood improve ecological health of northern NJ mature natural forests, except in limited fire-adapted forest types. This does not enrich diversity and does not initiate growth of young forests. Ecological health requires PROTECTION from logging, in our NNJ forest types.

In conclusion, for our forests and species of northern NJ public forested lands, the future after logging looks dim, with no forest recovery likely without intensive and costly restoration efforts. Moreover, we are releasing huge stores of carbon to the atmosphere and losing critical services of carbon sequestration for decades to come.

Science is very clear about the great value and services of our mature natural forests: to climate defense, water, and the species that are truly in trouble in our heavily populated state. Our mature public forests should be set aside from logging management – protected from canopy clearance as our citizens expect them to be, and ideally designated as “forever wild” preserves for biodiversity and climate defense. We should pursue a program of forest restoration instead: protection from deer, prevention of invasive vegetation, and restoration of native vegetation and habitat.

With best regards,

Sara Webb, Ph.D.

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Comments on New Jersey Forest Task Force Report to the New Jersey State Legislature and recommended next steps, 11 March 2023

Leslie Sauer, brookhollowfarm@gmail.com

Author *The Once and Future Forest: A Guide to Restoration Strategies*

Thank you for your concern about our deteriorating climate and the role NJ can play. I support many of the recommendations. My primary opposition to the Task Force Report is its failure to address climate change in a timely way that reflects the urgency of carbon management. Any real action is postponed years and depends on extensive funding and new staffing at the DEP to accomplish. We cannot afford to throw these crucial years away. In the meantime the DEP is completing and signing off on tens of thousands of acres of logging called something else that will be treated as approved going forward. Every management goal in these plans could be accomplished without extensive logging but that goal is not yet part of this unregulated planning process. This approval process should be suspended until more adequate protections of public resources are in place.

The Task Force Report failed to see the obvious consensus that was revealed in the meetings, proposals and comments. In one very informal poll taken early on over 80% of the participants voted to stop logging and wood removal but were told that wasn't good enough for consensus. We were not permitted to discuss the simple facts that logging reduces sequestration, destroys soil and reduces infiltration, that larger trees are the most important to protect, and that forestry is centered on wood production and not species diversity or ecological integrity. Similarly the 80x50 plan and the DEP Global Response Act fail to press for serious protections of our forests from logging, only from development. The report also ignores the importance of wood to soil building and restoration if it is left on the ground to be largely re-sequestered.

The comments attached by the participants are even more revealing of where there was greater consensus. If you read the opposing views they are barely different from the positive votes. Almost all of the replies said that they supported many of the recommendations but were concerned about the lack of real climate action and the need to protect large trees and older forests with clearly defined rules. The proposals show the same kind of consensus. But with three Task Force leaders resisting any logging restrictions from the outset their consensus was different.

Why isn't logging removed right now as a management option in every natural area purchased by the taxpayers for conservation and their benefit. This is a very low cost, immediate and effective solution to climate protection that would otherwise entail major delay and extensive funding before NJ takes any action.

Much of the Task Force Report is based on the incorrect assumption that protecting the carbon in our forests is incompatible with good habitat management. The dissenters did not oppose diversity and watershed concerns as claimed. That is simply untrue and there isn't a word from the taped meetings, the comments or the proposals to support it. Just the opposite. We seek a higher standard than ecological health as claimed in so many plans such as Sparta Mountain. Ecological health according to the DEP seems to include targeting and fragmenting our most intact forests, cutting hundreds of trees over 100 years in age and destroying a forest with a laurel understory to make poor quality young forest. Opposition to logging at Sparta Mountain seems to have been taken by the Task Force leaders as opposition to all management. The vagueness of these terms is a serious problem with the Task Force Report. There are no references because there is no science underpinning this report, especially recommendation 15 to allow logging for ecological health, climate or other noncommercial purpose. Cutting and selling wood IS commercial logging by any definition.

The DEP doesn't have the expertise, inclination or funding to reconcile these concerns. Like Sparta Mountain, the recent, and I think illegal, logging in Glassboro to create woodcock habitat that wiped out a population of an S2 endangered plant illustrates the failings of the DEP. The Wildlife Management Areas are especially vulnerable to this kind of mismanagement based on favoring one species or game species.

Instead of dueling positions on management, I urge the legislature to declare that the management of NJ public forests must conform to the Society for Ecological Restoration (SER) Standards. I am one of many people to recommend this solution. SER International was founded in 1987 and released its first guidelines as a Primer on Ecological Restoration in 2004. Since that time SER has grown as an international organization with programs worldwide and is recognized by the UN. The most recent Standards of Practice to Guide Ecosystem Restoration are currently in review to update the 2021 Version.

The scope of the SER standards is comprehensive and takes into account indigenous concerns, monitoring and assessment, costs as well as food and other economic dependence issues. SER also provides training programs and certifies practitioners. The science is impeccable and regularly reviewed by scientists in many disciplines from ecology and anthropology to psychology and legal concerns. The primary goal is to restore each site to a natural successional trajectory. Many dissenters asked for Ecological Restoration Plans specifically. Just look at the proposals that were not discussed.

This is not the time to sell our best defense against climate change. Confronting climate impacts will be very expensive for the State. If we expand logging in public forests now it will be only more difficult to manage if local foresters become dependent on cutting on public lands. The DEP has other government funding options that can replace the current focus on logging for DEP program support. Funding for afforestation and reforestation is increasingly available. These may be the trees we cut in the future instead of natural forests. It is important, however, to remember that it will take 1000 newly planted trees decades to replace what was lost with cutting and removing just one of the hundreds of larger trees from Sparta Mountain .

The last time a standard was proposed for forest management was in a bill proposing Forest Stewardship Council (FSC) rules for public forest plans. Christie vetoed it saying that basing the program on the FSC's standards would require the DEP to "abdicate its responsibility to serve as the state's environmental steward to a third party". Ecological Restoration Plans could be monitored by the DEP, not a third party, but the DEP would have actual standards for restoration instead of anything goes if you don't call it logging.

Forestry is not the appropriate management model for NJ's public forests. Forestry is about sustaining wood production. With one or two possible exceptions, that's not why NJ preserved these lands. Conservation and recreation do not require, and are diminished by, logging. NJ showed great foresight in preserving these forests. They are needed now as one of the State's most powerful tools for fighting the existential crises of climate and biodiversity that we now face. Ecological Restoration should be the focus of public forest management which includes protecting existing environmental services such as sequestration.

Good carbon management needs to be built into our regulatory system where it is now missing and protecting trees from logging now is a crucial step.

As Tom Gilbert said before the Task Force stated "We cannot afford to lose any of these natural areas that store carbon...the goal is not to lose the carbon already stored and to figure out how to store more."

The public does not want these forests logged. Public outcry stopped over 1100 acres of logging at Mahlon Dickerson and Roaring Rocks and reduced the cutting at Sparta Mountain by hundreds of acres. This legislature can take an important step to securing their protection and proper management by directing the DEP to use SER standards and eliminate the removal of wood and other forest products from our public lands.



CRANBERRY BOG RESTORATION, USA. PHOTO BY JEFF HAEKMAN.



INTERNATIONAL PRINCIPLES AND STANDARDS FOR THE PRACTICE OF ECOLOGICAL RESTORATION

SECOND EDITION SUMMARY

17x



GRASSLAND (CERRADO) RESTORATION BRAZIL
COPYRIGHT © MARCEL HUIJZER PHOTOGRAPHY

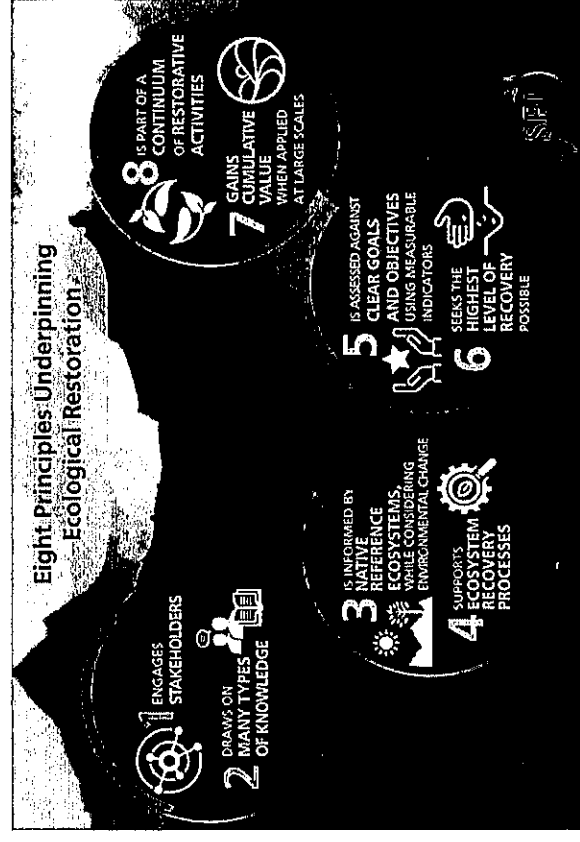
This summary provides an abbreviated outline and introduction to the full SER International Principles and Standards for the Practice of Ecological Restoration, Second Edition. We encourage you to download the full document at www.ser.org/standards to:

- better understand how the principles and standards relate to each other;
- apply these concepts at all stages of a restoration project, from planning to post-project monitoring; and,
- access the full glossary of restoration terms.

We hope that using the tools and ideas in these Standards will help you design and implement more effective restoration projects.

INTRODUCTION

Ecological restoration, when implemented effectively and sustainably, contributes to protecting biodiversity; improving human health and wellbeing; increasing food and water security; delivering goods, services, and economic prosperity; and supporting climate change mitigation, resilience, and adaptation. It is a solutions-based approach that engages communities, scientists, policymakers, and land managers to repair ecological damage and rebuild a healthier relationship between people and the rest of nature. When combined with conservation and sustainable use, ecological restoration is the link needed to move local, regional, and global environmental conditions from a state of continued degradation, to one of net positive improvement.



This graphic represents the Eight Principles for Ecological Restoration. Each principle is fully developed in the text.

INTRODUCTION (CONT)

The International Principles and Standards for the Practice of Ecological Restoration (the Standards):

- Present a robust framework to guide restoration projects toward achieving intended goals
- Address restoration challenges including:
 - effective design and implementation
 - accounting for complex ecosystem dynamics (especially in the context of climate change)
 - navigating trade-offs associated with land management priorities and decisions
- Highlight the role of ecological restoration in connecting social, community, productivity, and sustainability goals
- Recommend performance measures for restorative activities for industries, communities, and governments to consider
- Enhance the list of practices and actions that guide practitioners in planning, implementation, and monitoring activities, including:
 - appropriate approaches to site assessment and identification of reference ecosystems
 - different restoration approaches including natural regeneration
 - the role of ecological restoration in global restoration initiatives
- Include an expanded glossary of restoration terminology
- Provide a technical appendix on sourcing of seeds and other propagules for restoration.

SER and its international partners produced the Standards for adoption by communities, industries, governments, educators, and land managers to improve ecological restoration practice across all sectors and in all ecosystems, terrestrial and aquatic. The Standards support development of ecological restoration plans, contracts, consent conditions, and monitoring and auditing criteria. Generic in nature, the Standards framework can be adapted to particular ecosystems, biomes, or landscapes; individual countries; or traditional cultures. As the world enters the UN Decade on Ecosystem Restoration (2021-2030), the Standards provide a blueprint for ensuring ecological restoration achieves its full potential in delivering social and environmental equity and, ultimately, long-lasting economic benefits and outcomes.

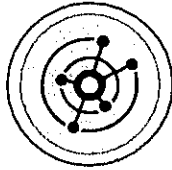


RESTORATION IN ACTION SOUTH AFRICA PHOTO BY KELVIN TRAUTMAN

PRINCIPLE 1

ENGAGES STAKEHOLDERS

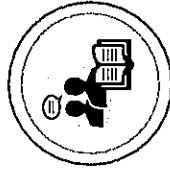
Ecological restoration projects recognize and acknowledge the interests and contributions of diverse stakeholders, particularly local stakeholders, and actively seek their direct involvement to provide mutual benefits to both nature and society.



PRINCIPLE 2

DRAWNS ON MANY TYPES OF KNOWLEDGE

The practice of ecological restoration benefits from a combination of acquired practitioner knowledge, Traditional Ecological Knowledge, Local Ecological Knowledge, and scientific discovery.



PRINCIPLE 3

IS INFORMED BY NATIVE REFERENCE ECOSYSTEMS, WHILE CONSIDERING ENVIRONMENTAL CHANGE

The use of reference models enhances the potential for native species and communities to recover and continue to reassemble, adapt, and evolve.



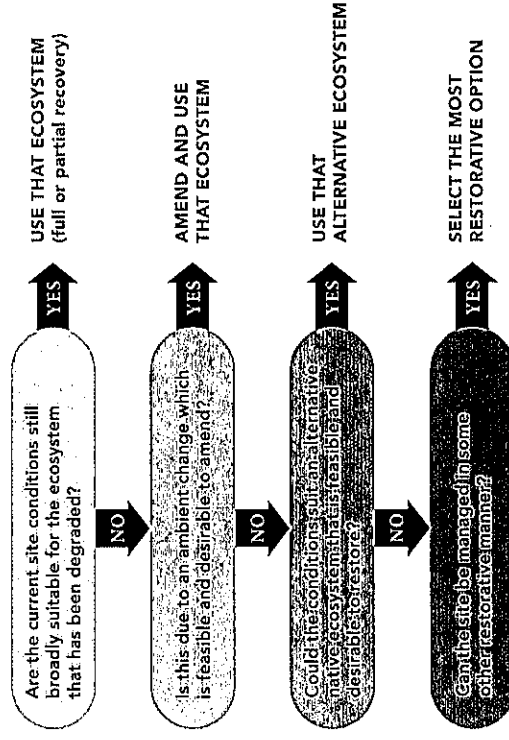
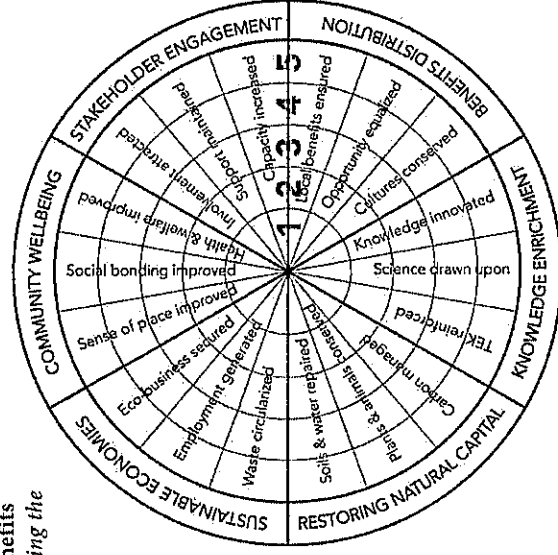
PRINCIPLE 4

SUPPORTS ECOSYSTEM RECOVERY PROCESSES

Practitioners enhance the natural recovery carried out by plants and animals in interaction with each other and their shared environment.



Example of a Social Benefits Wheel to assist in tracking the degree to which an ecological restoration project or program is attaining its social development targets and goals. See Principle 1.

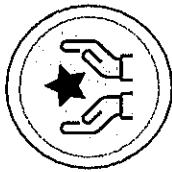


This Decision Tree can assist selection of appropriate native reference ecosystems for restoration projects. See Principle 3.

PRINCIPLE 5

IS ASSESSED AGAINST CLEAR GOALS AND OBJECTIVES, USING MEASURABLE INDICATORS

In the planning phase of restoration projects, the project vision, targets, goals, and objectives are clearly identified, along with specific indicators used to measure progress.



PRINCIPLE 6

SEEKS THE HIGHEST LEVEL OF ECOSYSTEM RECOVERY POSSIBLE

Ecological restoration aims for the highest practicable level of recovery appropriate to the circumstances.



PRINCIPLE 7

GAINS CUMULATIVE VALUE WHEN APPLIED AT LARGE SCALES

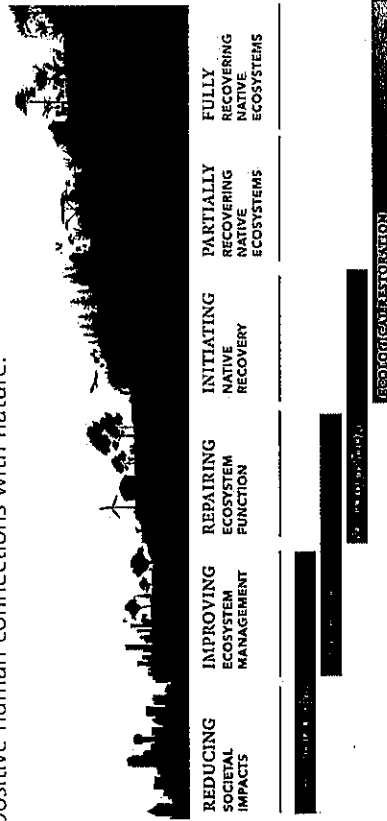
Ecological restoration projects can have beneficial outcomes regardless of their spatial scale. However, many ecosystem processes operate at larger spatial scales, such as the watershed or basin level, and scaling-up restoration actions is required to address some ecological and global sustainability needs.



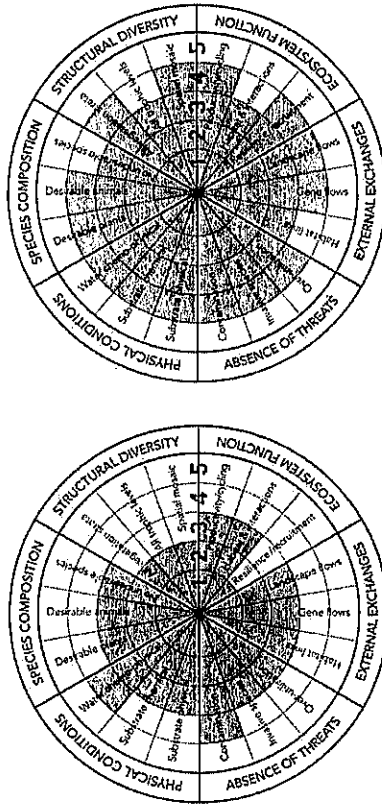
PRINCIPLE 8

IS PART OF A CONTINUUM OF RESTORATIVE ACTIVITIES

Ecological restoration is one of many strategies that can, to varying degrees, contribute to biodiversity conservation, increase carbon sequestration and the delivery of other vital ecosystem services, improve human health, wellbeing, and livelihoods, and enhance positive human connections with nature.



The Restorative Continuum illustrates how the implementation of restorative activities at all levels can optimize broadscale ecological and social outcomes. See Principle 8.



The Ecological Recovery Wheel is part of the Standards' five-star system for designing and implementing restoration, and for assessing progress as compared to a reference model. See Principle 6.

STANDARDS OF PRACTICE FOR PLANNING AND IMPLEMENTING ECOLOGICAL RESTORATION PROJECTS

The International Standards provide a comprehensive set of standard practices across four categories:

- planning and design
- implementation
- monitoring documentation, evaluation, and reporting
- maintaining ecological restoration projects

The standards of practice can be adapted to the size, complexity, degree of degradation, regulatory status, and budget of any project. As outlined in the full document, they are intended to provide guidance and recommendations for how to design, implement, and assess ecological restoration projects while recognizing that not all activities are applicable to all projects.

CONCLUSION

The world is entering an era of ecological restoration with governments across the globe making impressive commitments to restore degraded lands and landscapes through a wide range of restorative activities including ecological restoration at both the ecosystem and landscape scale. Ecological restoration is increasingly recognized as a critical tool for mitigating and adapting to the effects of environmental disasters and the impacts of climate change. It supports a process that improves human wellbeing at the individual, community, and national levels. When implemented effectively, ecological restoration can achieve profound ecosystem services benefits, ranging from the most basic needs like improving food and water security, to reducing the spread of disease, and improving individual physical, emotional, and mental health. Ecological restoration must also be integrated with conservation and sustainable production, especially at the landscape level. Restoration can help us move, globally, from centuries of cumulative environmental damage, to land degradation neutrality, and eventually to net ecological improvement. Ecological restoration therefore promises net gain in the extent and functioning of native ecosystems, together with the delivery of critical human wellbeing benefits. Achieving this requires that restoration investment be based on a strong, defensible, and understandable scientific foundation as outlined within these restoration principles and standards.

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The full document can be downloaded at www.ser.org/standards

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NJ Forest Stewardship Task Force Report

February 2023

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I. Charge to the Task Force

In February 2022, Senate Environment and Energy Committee Chairman Bob Smith convened a Forest Stewardship Task Force (the “Task Force” whose primary task was to seek and build consensus around matters related to the stewardship of New Jersey’s public forestlands. Senator Smith invited four conservation organizations representing divergent views and perspectives on forests and forest management to co-chair the Task Force. The four organizations were: NJ Audubon, NJ Conservation Foundation, NJ Forestry Association, and NJ Sierra Club. Each organization selected a representative to serve as co-chair. The four co-chairs were: Eileen Murphy from NJ Audubon, Tom Gilbert from NJ Conservation Foundation, Andy Bennett from NJ Forestry Association, and Anjuli Ramos-Busot from NJ Sierra Club.

Senator Smith asked the co-chairs to gather stakeholders – “anyone with an interest” – together and identify consensus and non-consensus issues surrounding forest stewardship on state lands and report on their findings by December 31, 2022. Senator Smith requested that the report identify actions that the State Legislature should consider to better protect and manage New Jersey’s public forestlands.

Specifically, the charge to the co-chairs from Senator Smith was: “...to study and identify ways in which the State can best manage its forests in order to fight climate change, prevent forest fires, improve ecosystems, and protect soil and water quality, among other things.”

This report describes the process used by the co-chairs to identify consensus and non-consensus issues related to the protection and management of public forestlands in New Jersey. Over the course of the months-long (*April through December of 2022*) process of meetings and discussions, the co-chairs came to unanimous agreement and the participants came to an overall supermajority agreement (*as defined as at least two thirds of the total*) on numerous issues which are described in the framework recommendations. The minority viewpoints have also been documented within this report.

II. Co-Chair Statement

Like the Task Force participants, the co-chairs came into this process with very different backgrounds and perspectives on these issues. However, through many hours of discussion with the participants, agency, and academic experts, and each other, we reached agreement on a comprehensive, high-level framework to guide the protection and management of New Jersey's public forestlands. Finding common ground was not easy given the passionate and divergent views on these issues, but through healthy give-and-take, we crafted a framework that enjoys support from two-thirds of the many organizations and individuals involved. We are united in our belief that these recommendations, if adequately funded and implemented effectively through legislation and rulemaking, will result in significant steps being taken toward better protecting and stewarding our public forestlands. These recommendations acknowledge the vital role that forests must play as part of the state's response to the climate crisis while also recognizing the equally important goals of ecological health, biological diversity, clean air and water, and recreation opportunities in the most densely populated State in the nation. And lastly, these recommendations acknowledge the deep intrinsic value of our forests apart from human use.

III. Executive Summary

The extensive process employed to develop the framework recommendations is described in Section VII. By the end of the Task Force discussions, the co-chairs reached unanimous agreement and a supermajority (*two thirds*) of participants supported the final framework recommendations. In total, 113 responses were recorded from organization representatives and individuals. There were 49 organizations with formal authorized representatives responding and 64 individual New Jersey residents responding to the survey. Responses from organizations and individuals resulted in the same levels of support - 67% supported the framework while 33% did not.

IV. Conceptual Framework of Recommendations

This framework was developed by the Task Force co-chairs based upon many hours of discussion among the co-chairs, Task Force participants, and invited speakers. In addition to Task Force wide meetings with participants, the co-chairs held numerous meetings among themselves to discuss topics that were raised during the meetings and to evaluate and discuss submitted proposals. Numerous proposals were submitted and considered; all proposals are found in Appendix E. The co-chairs developed and reached agreement on these recommendations through healthy give-and-take and by including ideas that enjoy broad agreement among diverse Task Force participants. The co-chairs view these recommendations as a starting point, with many details still to be worked out in legislation and rulemaking.

None of the recommendations are intended to interfere with current approved forest

management plans and their associated activities.

Statewide Inventory and Planning

Recommendation 1:

The NJDEP should be directed to initiate and conduct a statewide planning and mapping process for forested public land. Future protection and management of NJ's public forests must be based upon a comprehensive planning and mapping process at the landscape level based upon sound science and data. Additional appropriate inventories of significant biota and resources, as needed and feasible, should be included. This planning process should be directed by a science advisory panel* as well as require public participation throughout the process consistent with other comparable legislative processes in the state of NJ. The process should focus on state owned lands and then extend to significant forested parcels of county, municipal, and other lands acquired using state funding (acreage to be determined in the rulemaking). Throughout the planning process, places with historical, cultural and spiritual significance for Indigenous People should be identified, characterized, and protected.

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

Recommendation 2:

The NJDEP should be directed to commence a formal rulemaking process for the development of forest management plans* on public forests. The rulemaking will be informed by and consistent with statewide planning and inventory efforts in accordance with the NJ Administrative Procedures Act. The rulemaking should not take longer than three years to be adopted.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans, or other plans on public forested lands*

Recommendation 3:

The NJDEP should be directed to initiate and complete rulemaking to provide interim guidelines for forest management plans* on public lands. A rulemaking process, separate from Recommendation 2 and consistent with the NJ Administrative Procedure Act, will be initiated and completed within one year. This rulemaking will outline interim guidelines to govern the development of forest management plans* on state lands as well as significant forested parcels of county or municipal lands acquired with state funding (acreage to be determined in the rulemaking) until the more comprehensive rulemaking described in Recommendation 2 is finished. Once the rulemaking process has begun, newly initiated plans will not be approved for a one-year period or until the rules are adopted, whichever comes first. If this rulemaking extends beyond one year, those plans can move forward. During this one-year period, exceptions will be permitted in instances including emergency scenarios, fire management, or invasive species.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans, or other plans on public forested lands*

Recommendation 4:

The NJDEP should be directed to revitalize and implement the existing Natural Areas Program. The Program needs to be revitalized with increased funding, staffing, and appointments to fill vacant seats in order to fulfill the original vision and mission of the program. Implementation of activities within areas already identified with management plans should start immediately, and areas that are already identified but do not have plans should be prioritized for plan development. Further, the planning process should identify additional Natural Areas to be designated on public lands, including Natural Heritage Priority Sites. Additional resources are needed to fully implement the Natural Areas Program for existing and new Natural Areas.

Recommendation 5:

The NJDEP should be directed to identify areas where afforestation and reforestation should occur on public lands. This should be done as part of the inventory and planning process and should include measures needed to ensure success, consistent with the carbon sequestration goals identified in the NJDEP Global Warming Response Act 80x50 report,* which pursuant to that report includes reforestation.

**State climate goals - NJ's Global Warming Response Act 80x50 Report. pp 153-160.*

<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>

Recommendation 6:

The NJDEP should be directed to establish a new program within the agency to designate carbon reserves, as identified through the planning process, with a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel*) for their carbon benefit. Carbon reserves should be defined similar to “ecological reserves” in the Natural Areas Program as areas “managed to allow natural processes to proceed with little or no habitat manipulation” with the exception that management will occur only to address ecological or safety threats, as approved by an oversight council** that includes a mix of NJDEP representatives and private interests representing appropriate expertise. The council should be appointed by the Commissioner of the Department of Environmental Protection and have authority similar to the NJ Natural Lands Trust.

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

*** The oversight council should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists). There should be no Governor or legislative approvals needed for appointments to move forward.*

Recommendation 7:

The NJDEP should be directed to identify areas where active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health. This is consistent with the carbon sequestration goals

identified in the NJDEP Global Warming Response Act 80x50 report,* which discusses proactive management for carbon defense including thinning and burning.

**State climate goals - NJ's Global Warming Response Act 80x50 Report, pp 153-160.*

<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>

Recommendation 8:

The NJDEP must recognize the importance of adaptive management during the inventory and planning process, whereby planning, inventory, and management approaches are adjusted over time based upon new data and changing circumstances in our forests. The statewide planning and inventory should be updated at least every 10 years after completion of the first Statewide inventory.

Recommendation 9:

The NJDEP must recognize the significant variation in our forests, both on a macro (landscape) level and micro level as a guiding principle of the planning and rule-making process. For example, the uniqueness of the Pinelands and other regions of the state should be acknowledged as well as the variations that occur at a much finer spatial scale within a forest.

Forest Management Planning and Implementation

Recommendation 10:

NJDEP must protect and manage NJ's public forestlands to maintain and enhance carbon sequestration and storage as necessary to advance state climate goals* while advancing equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities.** Planning and inventories should guide the prioritization of management goals in specific areas, recognizing that these goals will be achieved across the aggregate of acres owned by the state rather than on one single acre in any specific area. Meeting these goals requires multiple management, restoration, and protection approaches which must be guided by sound science and be consistent with and guided by the inventory and planning process.

**State climate goals - NJ's Global Warming Response Act 80x50 Report, pp 153-160.*

<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>

***Low intensity recreation as defined means non-motorized outdoor, nature-based recreational activities, including, but not limited to, boating, swimming, fishing, hiking, hunting, trapping, picnicking, nature observation, photography, horseback riding, tent and shelter camping, cross-country skiing, bicycling, snowshoeing, rock climbing, ice climbing, and enjoyment of open space.*

Recommendation 11:

NJDEP forest management plans on public land must be developed in accordance with the process established through rulemaking noted in the previous section (Recommendations 2 and 3).

Recommendation 12:

The NJDEP should continue to use fire as an important management tool based upon sound science. The most significant action the agency can take on this issue is to fully implement the Prescribed Burn Act, which outlines processes for the use of prescribed burning as an effective tool for forest management and public safety. NJDEP should assist other land managers to use fire as a management tool in accordance with the Act. This assistance includes appropriate training to land managers to further expand the use of prescribed fire. In addition, the legislature and NJDEP should identify and address any legal barriers that hinder the use of prescribed fire by trained land managers.

Recommendation 13:

The NJDEP should be directed to amplify efforts to address the impacts of invasive non-native species, including insects, animals, plants, pathogens, and microorganisms. These efforts include re-convening The NJ Invasive Species Council, created in 2004 but currently dormant, and charging them with updating and implementing a state-wide strategic plan to address the issue. The NJDEP should develop regional collaborations with neighboring states including Pennsylvania and New York and other regions that have addressed this issue. See Appendix F for written testimony to the NJ Senate Environment and Energy Committee in relation to Senate Bill 2186 that bans the sale of nonnative species in NJ. In addition, the proposals* approved by Task Force participants include directing the legislature to do the following - consider passing legislation that establishes and funds a youth conservation corps with a focus on invasive species removal and increase funding for NJ Dept of Agriculture Alampi Lab to expand their work on invasive species control.

**Proposals are included in Appendix E.*

Recommendation 14:

The NJDEP should be directed to measure and reduce deer densities in our public forestlands to ecologically sustainable levels, with guidance from the Science Advisory Panel.*

Specifically, the NJDEP should identify and implement new and innovative steps,** such as establishing a pilot program for commercial sale of venison, exploring the role of natural predators in deep forests, providing a stable source of funding for hunters helping the hungry, implementing fertility control (including sterilization), and considering revisions to current guidelines on baiting and feeding (i.e., food plots). NJDEP should evaluate these and other steps with public input and report back with recommendations to the legislature within one year.

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

***Proposals are included in Appendix E.*

Recommendation 15:

The NJDEP should not include commercial profit as a goal in any forest management plan* on public land. Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of

wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans or other plans on public forested lands*

Recommendation 16:

The legislature and others must identify and implement funding mechanisms to ensure success of the recommendations in this report. Many elements and goals of this framework cannot move forward without significant resources and staffing to NJDEP. All recommendations discussed above require funding in the form of staffing and resources in order to be successful. Funding should include increased appropriations via the annual state budget, new state funding sources, external grant programs, and other government entities that can assist the agency in completing these goals. Specifically and immediately, the legislature/agencies should direct funding from the federal Inflation Reduction Act to advance the initiatives in this framework. Proposals* approved related to new funding sources include increased block rate pricing on water use to recognize the impact of forest protections on availability of clean water; extending the realty transfer fee progression to sales of homes \$1 million and above; reallocation of Green Acres funding to include management activities; tapping carbon markets including RGGI funding; and other federal funding sources.

**Proposals are included in Appendix E.*

V. Participant Response to Framework Recommendations, Results, and Commentary

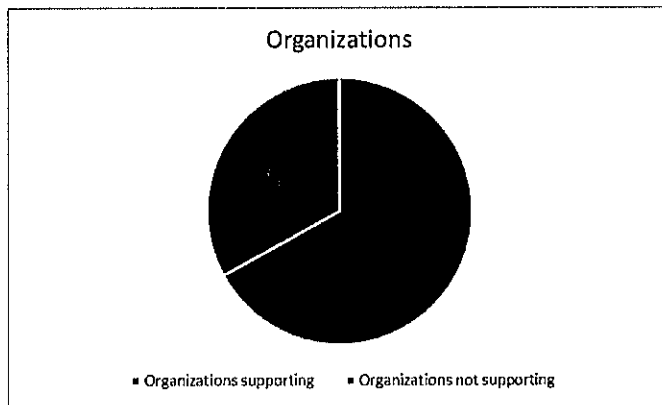
Task Force participants were invited to review three iterations of the framework and to provide comments on individual sections. For the fourth and final framework, we asked participants to support or not support the framework in its entirety, even if there might be some aspects that they do not agree with completely. The co-chairs felt that having one cohesive compilation of specific recommendations was more meaningful than pieces. While comments were solicited and reviewed for each individual recommendation in the framework, support was requested for the framework as a whole.

The survey templates utilized to collect input on the three versions of the framework appear in Appendix D.

By the end of the Task Force discussions, a supermajority of participants supported the final framework recommendations. In total, 113 responses were recorded from organization representatives and individuals. There were 49 organizations with formal authorized representatives responding and 64 individual New Jersey residents responding to the survey. Responses from organizations and individuals resulted in the same levels of support - 67% supported the framework while 33% did not.

ORGANIZATIONS

(a full listing of organizations appears in Appendix A)



49 organizations
33 support framework (67%)
16 do not support framework (33%)

Organizations supporting the framework (67%)

Allegheny Society of American Foresters (NJ Division)
Appalachian Mtn Club
Association of NJ Environmental Commission
Beaver Lake Realty Company
Duke Farms
Friends of Hopewell Valley Open Space
Great Egg Harbor Watershed Association
Hackensack Riverkeeper
Lebanon Township Environmental and Open Space Commission
Monmouth County Audubon
Morris County Park Commission
National Wild Turkey Federation, NJ Chapter
NJ Audubon
NJ Conservation Foundation
NJ Forestry Association

NJ Nursery & Landscape Association
NJ Outdoor Alliance PAC
NJ State Federation of Sportsmen's Club
NJ Tree Farm
Ocean County Dept Parks and Recreation
Pinelands Preservation Alliance
Princeton Environmental Commission
Princeton Shade Tree Commission
Raritan Headwaters Association
Raritan Twp. Environmental Commission
Sierra Club, NJ Chapter
Somerset County Parks
The Nature Conservancy
The Wildlife Society, NJ Chapter
Tri-County Sustainability
Union County Parks
USDA NRCS, NJ State Office
UU FaithActionNJ

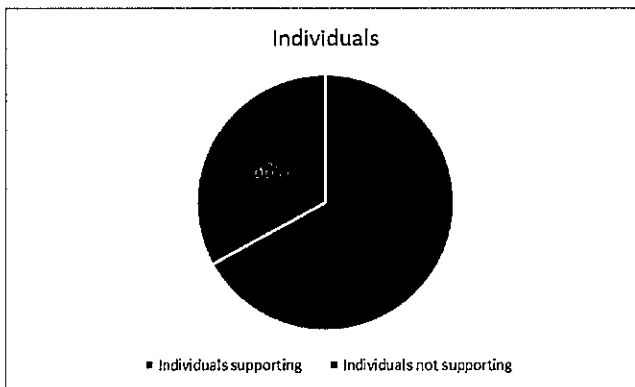
Organizations not supporting the framework (33%)

Animal Protection League of NJ (APLNJ)
Empower NJ
Environmental Education Fund
Friends of the Drew Forests
Great Swamp Watershed Association
Highlands Coalition
League of Humane Voters
NJ Environmental Lobby

NJ Forest Watch
NY NJ Trail Conference
Passaic River Coalition
Ridgeview Conservancy
Sourland Conservancy
Support Roaring Rock Park
Thonet Associates
Woods and Wayside

INDIVIDUALS

(a full listing of individuals appears in Appendix A)



64 individuals:
43 support framework (67%)
21 do not support framework (33%)

Individuals supporting the framework (67% of respondents)

Ann M Cahill-Makowsky
Barbara Cuthbert
Bill Beren
Bill Honachefsky Jr.
Clifford Paino
Constance Katzenbach
Dan Murnick
Dan Ross
Daniel P. Duran
Daniela Shebitz
David Jenkins
Deborah J. McConnell
Ingro Desvousges
Douglas Reid-Green

Elaine Mann
Gary Thein
James A. Quinn
James Engel
Jared Rosenbaum
Jean Montgomerie
Jeanne M. Fox
Jim Lyons
John Parke
Kenneth Rendall
Kristin A. Ace
Matthew Olson
Matt Polsky
Melanie H. McDermott

Michael J. Monahan
Michael Virgi
Michael W. Shier
Paul Rinear
Peter Delman
Rebecca Canright
Rita M. Alzamora
Salvatore Vaspol

Samantha Hartford
Scott Sillars
Steven Mitchell
Theodore Chase Jr.
Vinh Lang
Wayne Huntington
Wendy Mager

Individuals not supporting the framework (33% of respondents)

Anthony Maciorski
Cynthia Soroka-Dunn
Douglas Meckel
James D. Sabol
Jean Publiee
Joe Attamante
Joe Basralian
John Landau
John Saponara
Kate Krehel
Katherine Evans

Kimi Wei
Larry Baum
Leslie J Sauer
Margaret Wood
Matt Smith
Nicholas Homyak
Robert W Moss
Susan Michniewski
Thomas Conway
Wilma Frey

VI. Summary of supporting and dissenting opinions

The co-chairs accepted all supporting and dissenting opinions and included them in Appendices B (supporting) and C (dissenting). In some cases, an organization with a formal representative submitted multiple opinions. For survey purposes, only the authorized representative from an organization could provide a response representing that organization. But for these opinions, the co-chairs included all opinions from organization members in addition to the authorized representative.

Some participants combined submissions under both supporting and dissenting opinions, so there are some dissenting opinions expressed under supporting opinions, and some supporting opinions expressed under dissenting opinions. In this section, the co-chairs are attempting to identify the topics that were raised most frequently.

Main topics in the supporting opinions

All supporting opinions are presented in Appendix B.

The most common topic from participants who submitted supporting opinions concerned ensuring adequate funding for resources and staff to NJDEP to carry out the recommendations in the framework.

Overall, supporting commenters thought the process used by the co-chairs was robust and fair and, given the large number of participants, the optimal way to identify and categorize consensus and non-consensus participant opinions about forest protections and forest management in the state.

Main topics in dissenting opinions

All dissenting opinions are presented in Appendix C.

In summary, the most common topic from participants who submitted dissenting opinions concerned “logging,” which participants suggest means virtually any removal and sale of wood products. Some participants opined that logging is occurring on state land and that it should not be. This topic was raised at every Task Force meeting (*in fact, the Task Force dedicated two full meetings to this topic*). Participants who provided dissenting opinions on logging also tended to report that the only goal for the Task Force to consider for managing state forests was climate change, specifically carbon sequestration and carbon storage. Biodiversity, wildlife protections, water quality, building resilience to impacts from climate change, and other ecological goals were considered subordinate or should not be considered at all alongside carbon sequestration and storage. A subset of these participants also called for a moratorium on the implementation of any new or existing forest management plans on state lands and urged that a moratorium be put in place indefinitely or until the Task Force report was finished.

The Sparta Mountain Forest Management Plan, managed by NJDEP, was mentioned several times by commenters as an example of the logging concerns noted above. Although individual management plans were not discussed at Task Force meetings, the plan on Sparta Mountain was raised frequently by several participants in the dissenting opinions and at Task Force meetings.

Another common theme in the dissenting opinions focused on process. Some participants viewed the structure of the Task Force as an expert group that should have provided opportunity for debate and discussion on the science of forest ecology and management. Some also felt that formal voting by participants rather than a consensus approach should have been used in determining topics of majority interest and during the drafting and editing of the framework. A description of the approach the Task Force chairs agreed to is provided in the process section of the report.

Several commenters wanted the term “proforestation” to be included in the recommendations.

Interestingly, several commenters who disagreed with the framework overall and provided dissenting opinions actually favored all or most of the individual recommendations in the framework. The rationale for dissenting focused on the perception that there were unnecessary redundancies within the framework and the use of what they considered to be vague terminology that needed further definition.

VII. Overview of the Task Force stakeholder process

As stated in earlier sections, Senator Bob Smith formed the NJ Forest Stewardship Task Force in February 2022. According to Senator Smith, “The purpose of the Task Force will be to study and identify ways in which the State can best manage its forests in order to fight climate change, prevent forest fires, improve ecosystems, and protect soil and water quality, among other things. The Task Force will take feedback from interested parties and then compile a report on consensus and non-consensus issues with respect to forest stewardship for submission to the Committee.”

The Senator invited “anyone with an interest” to participate in the Task Force including experts, professionals, advocates, and individuals living or working in NJ and having an interest in NJ public forestlands. After the initial announcement of the formation of the Task Force, the co-chairs created a Google-based email and shared drive to handle Task Force activities. Within the first several weeks, nearly 1200 individuals requested to be included in the distribution list and to be kept apprised of activities of the group. In addition, the co-chairs used the Task Force Google mail system to send invitations to join the Task Force to multiple email lists related to forests and forestry; the goal was to spread the net far and wide. As per Senator Smith’s directive, “anyone with an interest” could participate by sending an email to the Task Force Gmail account. Over time, the number of active participants decreased but there were regularly 100 or so participants attending meetings throughout the course of the Task Force process. These email addresses were tracked in google mail.

Early in the discussions, the Task Force co-chairs and participants agreed that representation from Native American Tribes should be encouraged. Chief Vincent Mann of the Ramapough Lenape Turtle Clan agreed to participate and was asked to address the Task Force at an early meeting.

Given the diversity of interested parties, the co-chairs determined that a participant process to include both expert and nonexpert opinions during the course of discussions would be the appropriate way to move forward. Generally, task forces are work groups composed of experts in specified areas of knowledge or practice. They tend to be small groups of people brought together to accomplish a specific objective, with the expectation that the group will disband when the objective has been completed. A stakeholder group, on the other hand, is any party with an interest or concern in a subject and who may be positively or negatively impacted by a project, initiative, policy, or regulation.

Because the Senator asked the co-chairs to identify consensus and non-consensus issues, the co-chairs immediately began researching standards for reaching consensus and evaluated recommendations from The Consensus Council, Inc., Group Facilitation, The Democracy Project, and the National Academies of Science, Engineering, and Medicine – The Consensus Study Process. The co-chairs also met with the co-chairs of another task force that had been formed by Senator Smith several years earlier (2016) to learn about how that group identified consensus and non-consensus issues. Conversations were had with the four co-chairs of the Public Access Task Force to learn from their process. They were: Sara Bluhm, NJ Business & Industry Association; Tim Dillingham, American Littoral Society; Michael Egenton, NJ State Chamber; and Debbie Mans, NY/NJ Baykeeper.

Time went into planning the logistics of the public participant process and topic areas to prioritize. The first step was to prioritize general topic areas that participants thought were important pertaining to NJ public forests. A survey instrument (Appendix D-4) using Google Forms was prepared to gather information about what participants considered priority issues in NJ.

The co-chairs determined that the best mechanism for understanding participants' priorities was to invite them to submit their ideas, or proposals, via a survey mechanism (see proposal template in Appendix E).

On April 28, 2022, the Task Force kicked off its first public meeting (via Zoom) with 410 people registering (338 actually attending). The group included individuals, experts in forest science, forestry practitioners, environmental non-profit workers, and representatives from government agencies such as the NJ Department of Environmental Protection (NJDEP). The co-chairs opened the meeting with a general request for all participants to follow the Rules for Engagement (Appendix D-1) and discussed the results of the prioritization survey. They also presented instructions for proposal submission. Collaborations were encouraged, and a collaboration table (Appendix D-5) was created so participants could share ideas and work together on their narratives.

Senior staff from NJDEP presented background information at the initial meeting and at several additional meetings when requested. This was done so that all participants had the same baseline information about how the regulatory agency responsible for managing public lands currently implements its authority. NJDEP representatives attended meetings to address any questions about the agency's role but did not serve as a participant in the Task Force for the purpose of supporting or not supporting the Framework.

All Task Force meetings were recorded and shared via a shared Google YouTube channel.

During the kick-off meeting and all subsequent Task Force virtual zoom meetings, any Task Force participant was invited to use the raise hand feature to ask a clarifying question or make a comment, or they could ask questions or make comments to the co-chairs via the chat feature. Given that there were regularly over 100 people on anyone meeting call, it was necessary to have a process whereby participants could be heard but not interrupted.

Participants who had multiple questions or comments were asked to take turns to maximize the number of people participating.

In June, two workgroups were formed - an Ecological Health Workgroup and a Climate Workgroup. The Ecological Health workgroup, co-chaired by Murphy and Gilbert, identified strategies related to the ecological health of our public forests including matters such as biodiversity, overabundant deer, invasive species, pests, and pathogens. This workgroup examined what policy or management decisions are needed on our public forestlands to ensure their ecological health. The Climate Workgroup, co-chaired by Ramos-Busot and Bennett, identified strategies related to climate change on our public forests including matters such as carbon sequestration, climate resilience/adaptation, and the risks of wildfire. This workgroup aimed to examine what policy or management decisions are needed on our public forestlands in response to climate change.

One hundred thirty-two proposals were submitted between the two workgroups, each with references and specific legislative recommendations within the Task Force's scope. The proposal topics spanned categories such as invasive species, deer populations, natural areas, public education, and timber harvesting. The co-chairs developed a set of criteria for accepting proposals for group discussion (*criteria are presented in Appendix E*). Proposals that identified a single recommendation that could be developed into a legislative action were prioritized. Some proposals partially fulfilled the criteria, but had more than one idea included or needed some focus. In addition, some proposals were not true proposals but were opinion pieces from interested participants and were therefore not accepted for discussion. However, due to fervent requests from several Task Force participants, we include all submitted proposals in Appendix E.

Every two weeks, the co-chairs hosted two meetings lasting at least two hours each to go over participant-designed proposals. As mentioned earlier, each meeting included over 100 participants. Upon each discussion, the group would evaluate how to improve these ideas and express their support or opposition to the proposals. While a voting process was considered, participants could not agree on how to differentiate between organization voting and individual voting. The co-chairs determined that use of a consensus approach rather than a voting approach would work best. Objections raised in conversation or sent as emails were recorded and reviewed. Informal Zoom polls were used to gauge the status of agreement or disagreement among participants on proposals.

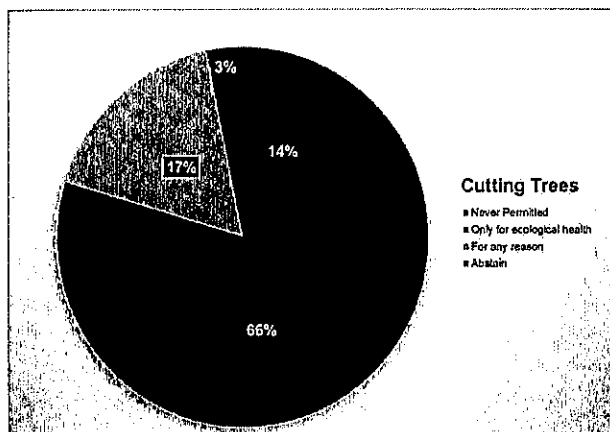
After hearing from NJDEP and others on the topic of how New Jersey public forests are regulated, participants formed a Regulatory subgroup in an effort to develop a common understanding of what regulations currently apply to forestry on public lands. After several discussions, the subgroup learned that, unlike for private land, there is not currently a formal process, established through rule-making that governs review of forest management plans on public lands. There are exceptions such as in the Pinelands and Natural Areas where some formal regulations governing forestry exist. No formal rule or guidance for forest management on public lands outside of these specifically regulated areas exists in law, statute, or regulation.

The NJDEP explained that it follows the guidelines that are in place for developing plans on private land for public land. Also, the NJDEP communicated that the agency follows the Land Management Review process and the 14-step process (NJDEP internal process) for all forest management plans on public lands. While not formally established by rule (internal operations of agencies do not go through the rule-making process), staff are required to adhere to the internal processes, standard operating procedures, policies, and training requirements. The Regulatory subgroup agreed that a formal rule-making process governing forest management on public lands should be required and established.

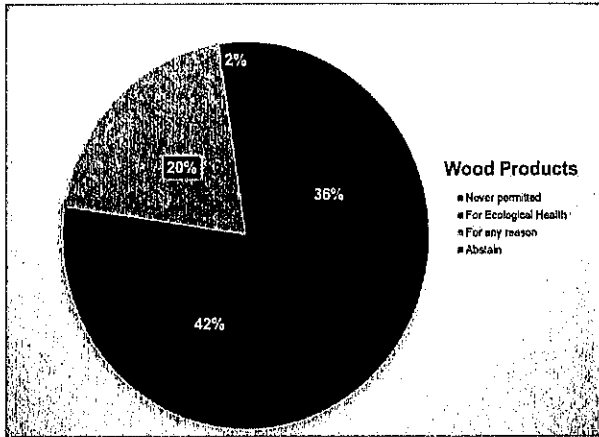
Originally, the agendas for Task Force subgroup meetings highlighted discussion of accepted proposals. However, stakeholders continued to direct comments and conversation away from the substance of the proposals and toward specific issues of proforestation, tree cutting and removal, and the forest management plan at Sparta Mountain. Individuals would not agree to support any proposals without first discussing these topics.

Consequently, the co-chairs addressed these issues by 1) inviting a panel of national experts to speak on proforestation ([link to webinar here](#)); 2) created an informal survey on participants' opinions on tree cutting and wood removal (Appendix D-2); and 3) dedicated two full meetings to the topic of "logging."

In an effort to hear all views, two two-hour meetings were held to discuss issues surrounding tree cutting and removal of wood products. The sponsors of proposals related to these issues were invited to discuss their proposals, and discussion was open to all interested participants. After hours of discussion, it seemed clear to the co-chairs that consensus among the participants on the Zoom call would not be reached on these issues no matter how many additional hours might be spent discussing them. It was unclear what the majority view was. A survey using Google Forms was created and sent to all Task Force participants to ascertain participants' positions on these issues. Results of those surveys can be found on the next two pages.



The tree cutting survey results showed that a majority of respondents (83%) supported allowing the cutting of trees to meet ecological objectives or other reasons. A minority of participants (14%) indicated that trees should never be cut for any reason, while 17% responded that trees can be cut for any reason including the generation of revenue. The largest contingent (66%) supported cutting trees only for ecological health purposes.



The wood removal survey results showed that a majority of respondents (62%) supported allowing the removal of wood to meet ecological goals or for other reasons. A minority of participants (36%) indicated that wood should never be removed for any reason, while 20% responded that wood could be removed for any reason including revenue generation. The largest contingent (42%) supported the removal of wood only for ecological health purposes.

Throughout the time that the Task Force met, opposition continued to be raised about the implementation of one particular existing forest management plan at Sparta Mountain. Because the charge of the Task Force was more general than any one individual management plan, the co-chairs directed discussion away from any individual plan and focused instead on more general management of all forested public lands in the state. Nonetheless, all four co-chairs visited Sparta Mountain together in order to observe the various project sites.

Because discussions on proposals were difficult due to continued distraction on the issues described above, the co-chairs moved away from proposal discussion (since we could not move forward on these) and opted to create a conceptual framework based on topics where there seemed to be some broad agreement among participants.

There were three versions of the framework recommendations developed for participant review and comment (*see Appendix D for the surveys for each draft version*). The co-chairs strived to incorporate language that addressed compromises on issues with widely ranging opinions among participants. Each draft represented an attempt to address participant comments on the framework.

For the draft frameworks, the co-chairs asked participants to provide input on each individual recommendation. However, for the final version, the co-chairs asked participants if they could support the framework as one comprehensive recommendation, rather than 16 separate parts. The rationale for this was to develop a holistic approach to stewarding New Jersey's public forests, rather than 16 specific recommendations found in the framework. This approach also acknowledged the idea that along the way, as the draft frameworks were being discussed and refined, compromises were being made on specific recommendations in order to move towards broad agreement on the full package of recommendations. The four co-chairs worked to be responsive to and reconcile different perspectives in order to build broad support for the recommendations. Our hope was that even if participants did not agree with every recommendation, they could support the holistic package because their priorities were

included. We understood that some organizations would not support the entire framework even if one recommendation was not exactly what they wanted.

After discussing the framework, meetings toward the end of the process addressed several topic areas of interest to participants where there seemed to be some general consensus. Those who submitted proposals on the topics of the use of fire in forest management, Natural Areas and Ecological Reserves, invasive species and deer management were invited to present their proposals to the rest of the Task Force for discussion. Areas of broad agreement from these discussions were then reflected in the final framework recommendations.

In December, as the Task Force was discussing proposals related to invasive species, a bill was introduced in the Senate Environment and Energy Committee focused on invasive species. The co-chairs quickly formed an Invasive Species Subgroup to address the Task Force recommendations on this topic. A team of seven participants (plus the four co-chairs) prepared written testimony (Appendix F) in support of Senate Bill 2168, and three subgroup members provided oral testimony at the Dec 15 public Senate Environment and Energy Committee hearing. Sixty Task Force participants (in addition to the four co-chairs and the seven subgroup members) signed in support of the written testimony. Their testimony was covered in the press ([NJ Spotlight News](#); [NJ Monitor](#)).

The final framework was circulated to all Task Force participants in mid-December with an opportunity to indicate whether they wished to support the recommendations or not support, and to provide statements for inclusion in the final report. By this time, there were 49 organizations actively participating.

VIII. Appendices

Appendix A: Framework Supporters and Dissenters

Appendix B: Supporting opinions

Appendix C: Dissenting opinions

Appendix D: Forms, Surveys, Documents

Appendix D-1: Rules of Engagement

Appendix D-2: Cutting and wood removal survey

Appendix D-3: Framework surveys

Appendix D-3a: First Draft Framework Survey – 124 Respondents

Appendix D-3b: Revised Framework Survey – 102 Respondents

Appendix D-3c: Third Revised Framework Survey – 63 Respondents

Appendix D-3d: Final Framework Survey – 111 Respondents

Appendix D-4: Original topic prioritization survey

Appendix D-5: Collaboration Table

Appendix D-6: Flyer for panel discussion, "Exploring Conservation and Proforestation options for NJ Forests"

Appendix E: Proposals

Appendix E-1: Blank proposal form

Appendix E-2: Criteria for acceptance for discussion

Appendix E-3: Proposals that were accepted, discussed, and reached consensus. At least three of four co-chairs agree that the proposal met criteria.

Appendix E-4: Proposals that were accepted and discussed during Task Force meetings, but consensus not reached. At least three of four co-chairs agree that the proposal met criteria.

Appendix E-5: Proposals that were accepted but not discussed. At least three of four co-chairs agree that the proposal met criteria.

Appendix E-6: Proposals that needed revision or co-chairs were split on acceptance (fewer than three of four co-chairs accepted)

Appendix E-7: Proposals that were not accepted: At least three of four co-chairs agree that proposal did not meet criteria.

Appendix F: Invasive Species subgroup written testimony to Senate Environment & Energy Committee

Appendix G: Glossary of terms

Appendix A: Framework Supporters and Dissenters

Task Force participants were invited to review several iterations of the framework and to provide comments on individual sections. For the final framework, we asked participants to support or not support the framework in its entirety, even if there might be some aspects that they not agree with completely. The co-chairs felt that a cohesive support was more meaningful than pieces. While comments were solicited and reviewed for each individual recommendation in the framework, support was requested for the framework as a whole.

The surveys used to collect input on the three versions of the framework appear in Appendix D.

113 Responses to Framework (after removing duplicates, etc.)

All Respondents – 113

76 support framework (67%)
37 do not support framework (33%)

49 organizations

33 support framework (67%)
16 do not support framework (33%)

64 individuals:

43 support framework (67%)
21 do not support framework (33%)

Organizations supporting the framework (67%)

Organization (if you are submitting on behalf of an organization)	Name of Submitter (point of contact)	Please list any academic credentials and certifications that you have*	Do you serve on the Board or as a Trustee or decision-maker on any organizations (include the one you are representing)? Please list (include the one you are representing).
Allegheny Society of American Foresters (NJ Division)	Steven Kalleser	Certified Forester	
Appalachian Mtn Club	Dawn Riley	Masters in Environmental Science	
Association of NJ Environmental Commission	Jennifer Coffey Executive Director	dual Masters degrees in Environmental Policy and Environmental Science from NJIT	
Beaver Lake Realty Company	Susan Elizabeth Doward		Highlands Glacial Lakes Initiative
Duke Farms	Thomas Almendinger	MS in Ecology & Evolution from Rutgers University, ESA certified ecologist	NJ Invasive Species Strike Team, NJ Wildlife Society
Friends of Hopewell Valley Open Space	Michael Van Cief	Ph.D. Ecology	No
Great Egg Harbor Watershed Association	Fred Akers		
Hackensack Riverkeeper	Hugh M. Carola		EarthShare NJ, Waterspirit
Lebanon Township Environmental and Open Space Commission	Nancy Roberts-Lawler	BA Biology University of Pennsylvania	Board Chair PEACE New Jersey
Monmouth County Audubon Soc	Colette R Buchanan	Juris Doctor	Yes
Morris County Park Commission	Kelli Kovacevic	B.S. Natural Resource Mgt - Rutgers, 2002; M.S. Biology; Montclair University, 2013	I am not on the board but serve as a department director
National Wild Turkey Federation, NJ Chapter	Miriam Dunne	B.S. Natural Resources Management (Cook College, Rutgers University, M.S. Biology (E. Stroudsburg University)	no
NJ Audubon	Alex Ireland President and CEO	PhD, Geological and Earth Sciences	

NJ Conservation Foundation	Emile DeVito	Ph.D. Ecology	Pinelands Preservation Alliance (Trustee), NJ Natural Lands Trust (Trustee), Highlands Coalition Natural Heritage Committee
NJ Forestry Association	Richard B Kelsky	BSCE; JD; Spotted Lanternfly Permitholder; Certified Tree Farm Owner; Forest Landowner and Operator	
NJ Nursery & Landscape Association	Elmer Platz		
NJ Outdoor Alliance PAC	Larry Herryghty	B.S. Wildlife M	NJ Hunters Helping Hungry, State Federation Of Sportsmen's Clubs
NJ State Federation of Sportsmen's Club	Frank Virgilio	Chairman, New Jersey, Fish, and Game Council	New Jersey Wildlife Foundation, New Jersey Fish and Game Council
NJ Tree Farm	Alex Kelchner		
Ocean County Dept Parks and Recreation	Geoffrey Lohmeyer		
Pinelands Preservation Alliance	Jaclyn Rhoads	Doctorate degree in environmental policy	
Princeton Environmental Commission	Tammy L Sands		
Princeton Shade Tree Commission	Sandra Chen	M.S., Ed.D.	Appointed to Princeton Shade Tree Commission
Raritan Headwaters Association	William Kibler	J.D.	
Raritan Twp Environmental Commission	Amy S Greene	Certified Senior Ecologist Ecology Society of American, Professional Wetland Scientist, Bachelors in Biology, Masters in Ecology, 48 years professional and volunteer experience in Environmental Studies and Permitting	
Sierra Club, NJ Chapter	Taylor McFarland		
Somerset County Parks	Shauna Moore	Master of Landscape Architecture	
The Nature Conservancy	Eric Olsen		
The Wildlife Society, NJ Chapter	Brian Kirkpatrick	BS, Certified Wildlife Biologist	Yes

Tri-County Sustainability	Sean Mohen		Yes
Union County Parks	Daniel J. Bernier		
USDA NRCS, NJ State Office	Don Donnelly	NJDEP Approved Forester, NJ Licensed Tree Expert #376	
UUFaithActionNJ	Peggy Middaugh	none	New Jersey Tree Foundation

46x

Organizations not supporting the framework (33%)

Organization (if you are submitting on behalf of an organization)	Name of Submitter (point of contact)	Please list any academic credentials and certifications that you have*	Do you serve on the Board or as a Trustee or decision-maker on any organizations (include the one you are representing)? Please list (include the one you are representing).
Animal Protection League of NJ (APLNU)	Angi Metler		League of Humane Voters
Empower NJ	Ken Dolsky	BA in physics	Highlands Coalition Natural Heritage Committee, VP NJ Forest Watch, Don't Gas the Meadowlands Coalition
Environmental Education Fund	Erica Cowper	BS in Biology from Drew University	New Jersey Environmental Lobby
Friends of the Drew Forests	Sara Webb	Ph.D., Ecology, M.S. Ecology and Forest Resources	Highlands Coalition Trustee
Great Swamp Watershed Association	Dorothea Stillinger	Degrees from University of Rochester and Yale	NJ Forest Watch, NJ Highlands Coalition Natural Heritage Committee
Highlands Coalition	Elliott Ruga		
League of Humane Voters	Doris Lin	B.S. in Applied Biological Sciences, MIT J.D., University of Southern California Law School	Animal Protection League of NJ
NJ Environmental Lobby	Anne O. Poole	MBA	Environmental Education Fund; Seaside Apt. Condominium Association.
NJ Forest Watch	Silvia Solaun	MS, Nutrition	
NY NJ Trail Conference	Timothy McKenna	25 years as an executive in the paper and forest product industry	
Passaic River Coalition	Laurie Howard		
Ridgeview Conservancy	Mitalee Pasricha		
Sourland Conservancy	Joe Kazmierczyk		
Support Roaring Rock Park	Laura Oltman		NJ Highlands Coalition, Trustee

Thonet Associates	John A. Thonet	BS & MS degrees in Forestry, SUNY College of Environmental Science and Forestry; Licensed Professional Engineer and Professional Planner in New Jersey	NJ Highlands Coalition Natural Heritage Committee
Woods and Wayside	Christopher Barr	BSc (Univ. California, Berkeley); MSc (Cornell Univ.); 30+ years as professional analyst of forestry issues globally; Center for International Forestry Research (CIFOR), 1998-2009.	Association of New Jersey Environmental Commissions, New Jersey Highlands Coalition, and New Jersey Environmental Lobby Ridgeview Conservancy

Individuals supporting the framework (67% of respondents)

Name of Submitter (point of contact)	Please list any academic credentials and certifications that you have*	Town of Residence	County of Residence
Ann M Cahill-Makowsky	None that applies. Have a Bachelor of Arts	Bordentown	Burlington
Barbara Cuthbert	Ed.D.	Princeton	Somerset
Bill Beren		Upper Montclair	Essex
Bill Honachefsky Jr. Clifford Paino	LEED Green Associate	Clinton Lincoln Park	Hunterdon Morris
Constance Katzenbach		Hopewell township	Mercer
Dan Duran	B.S, M.S., Ph.D.	Mantua	Gloucester
Dan Murnick	PhD, Professor Emeritus of Applied Physics, Rutgers University	Bernardsville	Somerset
Dan Ross		Long Valley	Morris
Daniela Shebitz	Ph.D. Ecosystem Science	Cranford	Union
David Jenkins	B.S. Natural Resources - Conservation, Cook College - Rutgers University, 1978. Graduate studies Wildlife Ecology - University of Wisconsin 1978-1982, Rutgers University non-matric Ecology and Natural Resources.	Milford	Hunterdon
Deborah J McConnell	BA Communications	Whiting	Ocean
Desvousges Ingro	BA Zoology and ISA Certified Arborist	Flemington	Hunterdon
Douglas Reid-Green		Flemington	Hunterdon
Elaine Mann	n/a	Colts Neck	Monmouth
Gary Thein		Livingston	Essex
James A. Quinn		New Brunswick	Middlesex
James Engel	None	Long Valley	Morris

Jared Rosenbaum			Pohatcong	Warren
Jean Montgomerie			Freehold	Monmouth
Jeanne Fox	BA Douglass College; JD Rutgers Law School; Certificate Harvard JFK School, Former BPU President		New Brunswick	Middlesex
Jim Lyons	BS, Cook College, Rutgers University; Master of Forestry, Yale School of the Environment		West Milford	Passaic
John Parke	senior professional wetland scientist (SWS) Certified Ecologist(ESA), BA in Environmental Studies (Ramapo State College of NJ)		Independence	Warren
Kenneth Rendall	BS Business Administration		Peapack-Gladstone	Somerset
Kristin A Ace	BFA / extensive training for Shade Tree Commission work		Morristown	Morris
Matt Polsky	MA, MBA		Belvidere	Warren
Matthew Olson	Ph.D in Forest Resources, UMaine		Buena Vista	Atlantic
Melanie H. McDermott	Ph.D. Environmental Science, Policy & Mgt., UC Berkeley; MSc., Forestry, University of Oxford		Highland Park	Middlesex
Michael J Monahan	BS - Business, Fellow Healthcare Financial Management		Ramsey	Bergen
Michael Virgil	NJ Licensed Tree Expert #593 Tree registered business		Hackettstown	Warren
Michael W Shier			Stockton	Hunterdon
Paul Rinear	AAS Computer Science, BA Physics, MA Math		Aberdeen	Monmouth
Peter Delman	none in this field		Jersey City	Hudson
Rebecca Canright			Asbury	Hunterdon
Rita M Alzamora	BFA, IT certifications		Lk Hiawatha	Morris
Salvatore Vaspol	BS Natural Sciences		Oak Ridge	Morris
Samantha Hartford	MSc Experimental Archaeology		Morristown	Morris
Scott Sillars	BS in Forestry		Princeton	Mercer
Steven Mitchell			Somerville	Somerset

50x

Theodore Chase Jr	Ph.D. (in biochemistry)	Franklin Two., Somerset Co.	Somerset
Vinh Lang	Master of Forestry, Yale University; Bachelor's of Environmental Science, Stockton University; NJ State Approved Forester	Riverside	Burlington
Wayne Huntington		Bridgewater	Somerset
Wendy Mager	Law degree	Princeton	Mercer

Individuals not supporting the framework (33% of respondents)

Name of Submitter (point of contact)	Please list any academic credentials and certifications that you have*	Town of Residence	County of Residence
Anthony Maciorski		Lake Hopatcong	Morris
Cynthia Soroka-Dunn	AS Broadcasting Bergen Community College, BA Communications SUNY New Paltz	Haworth	Bergen
Douglas Meckel		Hopewell NJ	Mercer
James D. Sabol	Bachelors Degree, Biological Science, Certified Wildlife Biologist, The Wildlife Society	Pompton Lakes	Passaic
Jean Publiee		Flemington	Hunterdon
Joe Attamante		Morris Township	Morris
Joe Basrallian	I have already completed. BA, MBA, Rutgers Environmental Steward, NYU graduate class in Sustainability, various Rutgers Cooperative Extension workshops on nature	Chatham Township	Morris
John Landau	Rutgers Environmental Steward, NJ Forestry Association Woodland Steward, Rutgers GI Champion, UN Convention on Biological Diversity 10 week MOOC "Ecological Restoration"	Morristown	Morris
John Saponara	PhD in ecology and evolutionary biology from Cornell, 1994	Ringoes	Hunterdon
Kate Krehel		Princeton	Mercer
Katherine Evans	Employment-NJ Div. Parks & Forestry, Clean Water Action, MA Audubon	Stockholm	Sussex
Kimi Wei		Fair Lawn	Bergen
Larry Baum	Minor in Mathematics; BSc. in Conservation Biology, Biology and Physics; Ph.D. in Theoretical Physics; have been involved with forest conservation issues since the early 90s; have done extensive reading on mature and old-growth forests; have grown up in an old forest and visited many mature and old-growth forests in the region and across parts of the U.S.	Rockaway	Morris
Leslie J Sauer	Assoc. prof UPENN, founder emeritus of Andropogon Associates. an environmental consulting firm, founding partner Society for Ecological Restoration	Sergeantsville	Hunterdon

	(1) Bachelors degree in Aerospace Engineering, 1979, Polytechnic Institute of New York, (merged with NYU and now known as New York University Tandon School of Engineering). (2) Master's degree in Aerospace Engineering, 1981, from Polytechnic University, (merged with NYU and now known as New York University Tandon School of Engineering). (+) Continued to take additional graduate school courses for 2+ years beyond the Masters Degree. (Same University as above).	West Milford	Passaic
Margaret Wood			
Matt Smith		New Brunswick	Middlesex
Nicholas Homyak		Lake Hiawatha	Morris
Robert W Moss	BA Economics	Bloomfield	Essex
Susan Michniewski	NA	Hopewell township	Mercer
Thomas Conway		Ringwood	Passaic
Wilma Frey	MLA (Landscape Architecture) Harvard GSD; MPA- MidCareer, Harvard Kennedy Sch. Govt.	Tewksbury Township	Hunterdon

*Optional – participants were asked to provide any credentials (education, experience) voluntarily. Some provided this information and others did not. The absence of credentials does not necessarily imply that the participant does not have a degree or experience.

Appendix B. Supporting Opinions

Following the conclusion of workgroup meetings and framework development, participants were given opportunity to express their final report commentary to be included in this report. https://accounts.google.com/SignOutOptions?hl=en&continue=https://docs.google.com/document/u/0/d/1eA_BANaN3Rf8EzyEsbflmTWJdd-9cZAG/edit%3Fusp%3Ddocs_home%26ths%3Dtrue%26tpof%3Dtrue&service=writely

The following comments were submitted by participants and organizations **in support** of the final framework. Participants were given 2500 characters.

A total of 35 responses were recorded – 16 were submitted on behalf of organizations and 19 were submitted by individuals representing themselves.

Supporting Opinions of Organizations:

Several organizations designated a Task Force representative to participate on behalf of an organization's viewpoint. There are 16 organizations that signed off on a response in support of the framework.

Ocean County Dept Parks and Recreation

Representative: Geoffrey Lohmeyer, *County Park Manager*

The framework presented to group is a good start. Before we are able to go in depth on specific topics I agree with the chairs that we must first agree on the broad topics that would outline how we breakdown into deeper discussions.

Great Egg Harbor Watershed Association

Representative: Fred Akers, *Operations Manager*

The process was robust, inclusive, and deliberative. The final Task Force Framework was an iterative compromise carefully crafted to maximize a consensus for forest management in NJ.

The Wildlife Society, NJ Chapter

Representative: Brian Kirkpatrick, *President*

Providing forests in varying stages of succession is critical to maintaining diverse wildlife populations. With regard to carbon sequestration and storage multiple age structures are likewise important. General young forests are more efficient at removing carbon from the atmosphere while older forests contain more carbon storage. At some point time forests become net emitters of carbon and other pollutants (e.g., VOCs). Commercial harvest options

should be considered as viable option for forest management as it provides economic benefits and potential for reduced fossil fuel consumption and long term storage of carbon in production of durable products (e.g., lumber)

Friends of Hopewell Valley Open Space

Representative: Michael Van Clef, *Stewardship Director*

"The co-chairs did an extremely good job synthesizing diverse opinions to create a framework that has the potential to significantly improve forest stewardship, both in stakeholder/public perception and stewardship outcomes. The use of expert panels is key to moving forward in a way that allows the multiple perspectives required to steward public lands for multiple purposes.

I strongly support the framework and all of its elements. Given my particular experience/interest on invasive species, I most strongly support this element."

NJ Audubon

Representative: Alex Ireland, *President and CEO*

"Overall, the proposed framework represents a balanced approach to mapping resources, developing plans, and managing publicly owned forests. Inclusion of critical concepts like scale, variability in forest ecosystems, and application of adaptive management frameworks make it possible for me to support this framework. I appreciate the inclusion of properly credentialed science advisory groups as a mechanism to weigh trade-offs and drive thoughtful decisions.

I have three broad areas of potential concern, which I list below in order of importance.

First, I have some concern that the framework overemphasizes the importance of biological carbon sequestration and overstates by implication the potential for NJ forests to offset emissions (all natural sinks only offset ~8% of 2018 emissions within the state, <https://www.nj.gov/dep/climatechange/docs/nj-gwra-80x50-report-2020.pdf>). As the state progresses, it will be critical to maintain focus on habitat and biodiversity needs, managing for structural and compositional diversity at the landscape-scale. Singular focus on maximizing biological carbon sequestration could have severe ecological consequences through simplification while delivering negligible absolute benefits to the global climate system.

Second, I am somewhat concerned that proposed formal rulemaking processes for management plans could take longer than anticipated and once completed the resulting administrative burden could further reduce the rate at which scientifically defensible management actions occur in publicly owned forests.

Third, the framework of course proposes an aggressive agenda for an already overburdened agency. While the framework clearly calls for added resources to DEP, the magnitude of the added charge could well outstrip the willingness of the legislature to provide additional funding."

Allegheny Society of American Foresters (NJ Division)

Representative: Steven Kalleser, *Chair Emeritus*

"The New Jersey Division of the Allegheny Society of American Foresters generally supports the framework, as written. This organization does so, largely as an acceptance of the compromises made on most -- if not all sides -- of this issue.

Our greatest concern is an issue that was part of the charge of the task force, and therefore has been treated as out-of-bounds by the co-chairs. Specifically, the task force's recommendations are to apply to all public lands within the state. Any subsequent action taken by legislative or executive action must reflect the enormous disparity in resources between the NJDEP and the average municipality. It is not reasonable to subject a municipality with no full-time staff relying on a local Boy Scout troop for manpower on a 30 acre property to the same standards as a branch of the NJDEP with a suite of full-time employee subject matter experts and significant stewardship budget managing a property of 1,500 acres or more. We trust that policymakers will recognize this simple fact.

In general, we still believe that the framework contains too many advisory groups and recommends hiring too many additional full-time employees, all with too little benefit given the cost. This cost is not only measured in dollars and cents, but also in NJDEP (and NJDA) staff time to oversee, and also in dilution of the expertise of the local land manager (be it State Park Service Superintendent, Forest Service Forester, or Fish & Wildlife Land Manager, etc.). We trust that policymakers will only implement those parts of this framework that pass a rudimentary cost/benefit analysis.

Lastly, we believe that a key finding of any legislative or executive action based on this framework must include the fact that New Jersey's forests are disturbance-dependent ecosystems. While this is most obvious in the Pinelands, it is also incontrovertibly true throughout the rest of the state. As such, a decision (or a non-decision) that results in non-management must be viewed as a management decision that will result in consequences. While not explicitly stated, the tone of the framework is tilted away from active management. We trust that policymakers will treat any decision not to manage as a management decision, subject to all of the analysis demanded of any other management decision. Being pro-active gives the NJDEP -- acting in accordance with its various legislative mandates -- a fighting chance of meeting its goals."

New Jersey Forestry Association

Representative: Richard B. Kelsky, *Member & Board of Directors*

"The New Jersey Forestry Association ("NJFA") appreciates the opportunity to participate in the NJ Forest Task Force ("Task Force") and comment on its "Conceptual Framework of Recommendations" ("Framework") for NJ's public forests.

Since the Framework is a "starting point" of "ideas" with the "details still to be worked out in legislation and rulemaking," NJFA believes that line-by-line comments would be counter-productive at this time. Our general comments are below.

1.Framework Support

The NJFA supports the Framework, consistent with this response.

2.Renewed Focus on Public Forests

The NJFA supports a renewed focus on NJ's public forests, which have been overlooked and under-funded.

3.Forest Management

The NJFA supports planned proactive management of NJ's public forests utilizing recognized science-based management activities to achieve a broad range of goals.

4.Range of Goals

The NJFA recognizes that forest management goals are broad and diverse, for example, forest sustainability, ecological health, habitats, diversity, fire-risk management, climate resiliency, water and soil resources, and recreation.

5.Funding

The NJFA recognizes that responsible forest management of NJ's public forests will require significant funding and that some funding may come through economic recovery from forest products removed during approved forest management activities intended to achieve other primary goals.

6.Legislation and Rulemaking Realities

The NJFA recognizes that the legislative and rulemaking processes will take years, and that in the interim, proactive forest management must proceed to achieve the broad range of forest management goals and reduce risks to NJ's public forests and residents.

7.Forest Uniqueness

The NJFA recognizes that each of NJ's public forests is an individual ecosystem which exists for various purposes and must be analyzed and managed for the intended results within that forest taking into consideration the overall goals for NJ's public forests.

8.The 80x50 Report

The NJFA supports implementation of the Carbon Sequestration Pathways identified in NJ's Global Warming Response Act 80x50 Report - 2020 (pp. 153-156).

Conclusion

The NJFA recognizes the challenges in producing a framework that satisfies most constituents, while remaining focused on the goal of ensuring sustainability of NJ's public forests. We look forward to working with the Task Force, Senator Smith, the Legislature, NJDEP and NJ Parks & Forestry."

NJ Nursery & Landscape Association

Representative: Elmer Platz, *Member*

NJNLA endorses and supports the opinions provided by NJFA

Raritan Headwaters Association

Representative: William Kibler, *Director of Policy*

"Re: Recommendation 1: The Science Advisory Panel should be separate from DEP

Re: Recommendation 3: The rulemaking and guidelines for developing forest management plans on public forests should include the most stringent protections of streams, wetlands, vernal pools, soil, and steep slopes (including limits on disturbance within buffers); should prohibit commercial logging; should protect mature and maturing forests and with very few exceptions allow tree cutting (but not removal) for active, small-scale habitat management and invasive control. See RHA's proposal to the NJ forest taskforce calling for protection of forested watershed health."

NJ Highlands Coalition

Representative: Elliott Ruga, *Policy & Communications Director*

"Rec. 1: We agree with the concept of statewide planning and the recommendation overall; however, the scientific advisory panel should be independent from the NJDEP and must include a balance of experts from biogeochemistry, ecology, forestry, and wildlife biology such that no group is overrepresented while maintaining an appropriate span of expertise. Without

this clarification we will move to a dissenting opinion on this recommendation due to its potential for greater harm than help.

Rec. 2: We agree with this recommendation.

Rec. 3: We agree with the recommendation only if a moratorium on timber harvesting for the duration of the one-year interim rule making.

Rec. 4: We agree with this recommendation.

Rec. 5: We agree with this recommendation.

Rec. 6: We agree but with the same stipulation as recommendation 1 for both the science advisory panel and the oversight council. Additionally, appointments must be made directly by the DEP Commissioner without delegation.

Rec. 8: We agree but the first sentence should read similar to the following: "... importance of adjusting ecological goals over time due to new data and changing circumstances in our forests...". The term adaptive management is a term used in forestry which may include timber harvesting.

Rec. 9: We agree with this recommendation.

Rec. 10: We agree with this recommendation.

Rec. 11: We agree with the same stipulation as recommendation 3.

Rec. 12: We agree with this recommendation.

Rec. 13: We agree with this recommendation.

Rec. 14: We agree with the same stipulation as recommendation 1.

Rec. 16: We agree with this recommendation."

NJ Tree Farm

Representative: Erica Muller, *Member*

I support the final framework as written and appreciate the hard work that has been put into this!

Princeton Shade Tree Commission

Representative: Sandra Chen, *Member*

The Princeton Shade Tree Commission finds that many of the recommendations in the Conceptual Framework pertain to State agency matters that lie outside its purview. But we do appreciate and support the recommendations for State-wide efforts to reduce deer densities, a ban on the sale of invasive species, and enhancement of the capacity for use of prescribed burns as an ecological management tool. These measures have the potential to strengthen our ability to sustain the health of our municipal forestlands.

National Wild Turkey Federation, NJ Chapter

Representative: Miriam Dunne, *Advisor*

"NJNWTF supports sound management of NJ's forests, and the efforts of the task force to

consider all goals in the management of public lands. Biodiversity goes hand in hand with climate considerations, and managing for biodiversity also enables forests to be more resilient to the expected perturbations that will occur with climate change. Biodiversity is an important goal as climate resilience, and management needs to take place on public lands at a scale in order to benefit imperiled species. We support the points in the framework that promote prescribed burning, sound scientific-based deer management, and invasive species control.

NJ's forests are valuable to its residents, and the interests in the management of our forests are substantial and increasing. DEP must be given tools (funding and staff) as well as autonomy from political control over the direction that forest management takes. We support the public input process and the addition of councils to help guide DEP's work, but ultimately DEP must be the arbiter of any challenges to its science and policies, and it must not be beholden to the politics of the angry mob. DEP must have the final word on where management takes place and at what scale.

DEP should be able to use commercial harvesting of wood products as a tool to accomplish management goals, whether they be primarily forest health or wildlife management goals. DEP should not be hampered by whether or not a "profit" is realized in the sale of wood products from state land. The state should not have to apologize for saving the taxpayers a little money while accomplishing its management goals."

NJ Outdoor Alliance PAC

Representative: Larry Herrighty, *Board Trustee*

"New Jersey Outdoor Alliance (NJOA) supports the following recommendations:

Recommendation (R) 4. NJOA supports the Natural Areas Program and agrees it needs adequate funding to accomplish its mission.

R 6. NJOA supports establishment of a Science Advisory Panel provided members are appointed by the DEP Commissioner and have term limits.

R 8. NJOA supports adaptive management of all forest lands.

R 9. NJOA recognizes there is significant variation in our forests, both at a landscape and micro level and this should be considered as a guiding principle in forest planning.

R 10. NJOA recognizes forests should be protected and managed to support climate goals while advancing equally important goals as stated.

R 12. NJOA recognizes the use of fire as an important management tool as practiced by DEP.

R 14. NJOA supports the recommendation to adequately fund NJ Hunters Helping the Hungry in order to expand their ability to pay for the processing of donated deer as outlined in proposal #117.

R 16. NJOA supports increased funding by the legislature in order to implement supported recommendations.

NJOA has reservations concerning the following recommendations:

R 5 & 6. NJOA recognizes that existing old growth or mature forest stands have value that should be protected and that adaptive management should be practiced in order to preserve

and enhance their value, including for carbon sequestration. However, we note that the science on forest management and forest age necessary to optimize carbon sequestration is unsettled. Therefore, the size and amount of such carbon reserves must be carefully considered, given the equally important ecological and societal goals that public forests provide to New Jersey citizens."

NJ Conservation Foundation

Representative: Emile DeVito, *Manager of Science and Stewardship*

"NJ Conservation is honored to have been among the co-chairs of this effort. We appreciate the many hours of dialogue and work by our fellow co-chairs and Task Force members. A consensus process involving a large number of stakeholders with diverse backgrounds will never be 100% to any participants liking. However, we believe that these recommendations reflect broad agreement among many participants and, if implemented effectively, will significantly advance protection and management of NJ's public forestlands.

In particular, we are enthusiastic about the recommendations calling for comprehensive, science-based planning, formal rules governing forest management plans, revitalization of the Natural Areas Program, establishment of carbon reserves to protect mature forests, steps to address invasive species and reduce the deer population, and increased funding to accomplish these goals.

Many of the recommendations will simply be impossible to implement unless NJ DEP has significantly increased funding and staffing, including comprehensive planning for public forestlands, rule-making regarding forest management plans, revitalization of the Natural Areas Program, and addressing invasive species.

Many of these recommendations will also falter if NJ DEP fails to take new, innovative steps to reduce the deer population. Our forests will simply fail to regenerate in many areas, and efforts to increase carbon sequestration through afforestation and reforestation will be frustrated as well. NJ DEP must have clear direction from the legislature to manage the deer population for ecological sustainability rather than for recreational purposes.

The recommendation to establish carbon reserves is critical in light of the state's goal to maintain and enhance carbon stored in natural lands to help meet emissions targets under the Global Warming Response Act. Recent science affirms that allowing intact, mature forests to further mature into old growth forest is an effective sequestration strategy. The forest planning process should identify significant acreage of mature forest cover for designation as carbon reserves, including forests not previously cleared for agriculture that can be identified in the late 1800s C.C. Vermeule forest cover maps and 1930s aerial photography maps. Such forests tend to be the most ecologically intact and have significant potential for carbon sequestration and other ecological benefits if allowed to mature into old growth."

Sierra Club, NJ Chapter

Representative: Greg Gorman, *Conservation Chair*

The proposed framework is an excellent tool to address the development of appropriate legislation and regulation for managing NJ forests. The framework promotes a science-based approach to achieve climate and ecological objectives. We encourage a continuation of an active stakeholder process to ensure the adequacy of forest stewardship plans and prescription.

Supporting Opinions of Task Force Individual Participants:

There are 18 individuals that shared a comment in support of the framework.

Name of Submitter: Rebecca Canright

Credentials: B.A. Evergreen State College

County of Residence: Hunterdon

Affiliated Organization:

As a young person, I strongly support the ecological protection goals of the task force. It is hard to work together and compromise but I feel you have done an excellent job to the best of your ability. I strongly commend your work to combat invasive species, as well as protect as much forest as possible, while minimizing logging as much as possible. Yeah I think that in this time of climate change, forests are an essential resource for sequestering carbon and protecting biodiversity. New Jersey is a special place of ecological biodiversity, especially our forests, but all of them deserve protection. Thank you for your time and consideration!

Name of Submitter: Elaine Mann

Small Farm Owner

County of Residence: Monmouth

I fully support

Name of Submitter: Vicki Schwartz

Credentials: PhD, Neuroscience and Behavior, Rutgers

County of Residence: Somerset

This seems like a very responsible plan. I'm especially happy to see that Recommendation 15 states that commercial profit should not be a goal in any plan on public land. I support the overall goals as well.

Name of Submitter: Matt Olson

Credentials: Ph.D. in Forest Resources

County of Residence: Atlantic

Many thanks to the co-chairs for leading us to this stage. I'm fine with vision and language of the framework.

Name of Submitter: Gary Thein

Credentials: Master Mechanical Engineering

County of Residence: Essex

"I congratulate the Co-Chairs for their hard work in developing this framework. Participation in the stakeholder process has been educational and led me to a number of conclusions regarding NJ and GHG management. I am indebted to them and Senator Smith for this opportunity. The 'broad agreement' is a form of least common denominator that most of the participants could accept. I believe it could be improved in the following area.

Carbon sequestration in biomass is the only offset to GHG emissions in the NJDEP emissions inventory, accounting for nearly 10% of current emissions. As NJ strives to meet its 2050 GHG goal biomass offsets will become critical. All forestry projects should include a carbon sequestration impact evaluation as a primary criterion.

The NJ Global warming response Act 80x50 Report referenced by the framework requires a 33% increase in biomass sequestration to meet the 80x50 GHG target, presuming NJ meets all of the reduction strategies such as removing all gasoline powered light duty vehicles by 2035 and 100% clean energy generation by 2050! It appears obvious to me that additional sequestration will be necessary to offset shortfalls in these ambitious goals. The report also states:

'State government operations should lead by example by expanding the scope of its land preservation efforts. Executive Order 215 (1989) requires departments, agencies, and authorities of the state to submit environmental assessments or environmental impact statements to the DEP for state-funded or state-initiated construction projects greater than \$1 million. This Executive Order should be updated to include consideration of climate change and impacts to natural carbon sinks.' (page 157)

Carbon sequestration in forests is maximized when trees are mature, typically 80 to 100 years after sprouting and continues for centuries. Cutting mature or maturing trees has a negative impact for the remainder of the 21st century. Maintaining the current forested ecosystems is critical. (For example, upland forests store 81.7 tons carbon per acre and are critical to meeting this goal.) The framework specifically avoids recommending proforestation, a crucial error. Afforestation and reforestation projects (Recommendation 10) are admirable but only have long term impact."

Name of Submitter: Ingro Desvousges

Credentials: BA Zoology and ISA Certified Arborist

County of Residence: Hunterdon

Due to the number of invasive species (stilt grass, olive species, barberry, etc.) forests need help to maintain the biodiversity of species acclimated to NJ. Without help, the forests will still look green but the greenery will not be supporting the extent of wildlife it could if invasives were first controlled. Sparta Mountain work by the NJDEP needs to continue.

Name of Submitter: Clifford Paino

64x

Credentials: LEED Green Associate

County of Residence: Morris

I support this framework in general. One concern that I have is regarding the funding that is mentioned throughout the framework. There should be a strong third-party oversight committee in place, to ensure that tax-payer funds are being utilized properly.

Name of Submitter: Bill Beren

County of Residence: Essex

Affiliated Organizations: Sierra Club, Montclair Bird Club

I generally support the principles as enunciated, particularly the emphasis on complying with the state's climate goals and the creation of carbon reserves and enhancing carbon sequestration. I am concerned that Recommendation 12 includes language that prescribed fires should be expanded and that barriers hindering the use of prescribed burns should be overcome prior to the publication of the state forest management plan. I would also strengthen the language in Recommendation 15 - not only should commercial timber management not be a goal for any plan on public lands, but the sale of wood products should only be considered when there is no feasible alternative to leaving timber or other plant materials in place, such as when the plan calls for removing invasive plant or pests or removing diseased wood.

Name of Submitter: Steven Kalleser

Credentials: CF (Certified Forester?)

County of Residence: Hunterdon

Affiliated Organization: Allegheny Society of American Foresters (NJ Division)

"The New Jersey Division of the Allegheny Society of American Foresters generally supports the framework, as written. This organization does so, largely as an acceptance of the compromises made on most -- if not all sides -- of this issue.

Our greatest concern is an issue that was part of the charge of the task force, and therefore has been treated as out-of-bounds by the co-chairs. Specifically, the task force's recommendations are to apply to all public lands within the state. Any subsequent action taken by legislative or executive action must reflect the enormous disparity in resources between the NJDEP and the average municipality. It is not reasonable to subject a municipality with no full-time staff relying on a local Boy Scout troop for manpower on a 30 acre property to the same standards as a branch of the NJDEP with a suite of full-time employee subject matter experts and significant stewardship budget managing a property of 1,500 acres or more. We trust that policymakers will recognize this simple fact.

In general, we still believe that the framework contains too many advisory groups and

recommends hiring too many additional full-time employees, all with too little benefit given the cost. This cost is not only measured in dollars and cents, but also in NJDEP (and NJDA) staff time to oversee, and also in dilution of the expertise of the local land manager (be it State Park Service Superintendent, Forest Service Forester, or Fish & Wildlife Land Manager, etc.). We trust that policymakers will only implement those parts of this framework that pass a rudimentary cost/benefit analysis.

Lastly, we believe that a key finding of any legislative or executive action based on this framework must include the fact that New Jersey's forests are disturbance-dependent ecosystems. While this is most obvious in the Pinelands, it is also incontrovertibly true throughout the rest of the state. As such, a decision (or a non-decision) that results in non-management must be viewed as a management decision that will result in consequences. While not explicitly stated, the tone of the framework is tilted away from active management. We trust that policymakers will treat any decision not to manage as a management decision, subject to all of the analysis demanded of any other management decision. Being pro-active gives the NJDEP -- acting in accordance with its various legislative mandates -- a fighting chance of meeting its goals."

Name of Submitter: Salvatore Vaspol

Credentials: BS Education

County of Residence: Morris

I support the current suggestion as described above

Name of Submitter: Rita M Alzamora

Credentials: BFA, IT certifications

County of Residence: Morris

Affiliated Organization: NJ Historical Garden Foundation (Cross Estate) - not representing

"I am voting for the framework to go forward, yet I do want to voice my opinion on some reservations.

While this document has some merit, it suffers from ambiguous and subjective language resulting in lack of clarity in places. Recommendation 1 is really 2 statewide initiatives: mapping process and planning process, predicated on the assumption that they don't exist today. Re: 'mapping', DEP presentations to NJFTF often contain old data slides and refer to years old studies. This might point to a lack of centralized information of our state's current landscape inventory, history, health, research and analysis regarding the same. Understanding the data are prerequisites for Reqs 4 - 9 and for any planning. And data should be fresh (not every 10 years! Re: Req 8) especially if the planners have any hope of being adaptive to our changing environment. My hope is that a focus on methodologies to collect, store, share and model data will be developed.

Furthermore, in good faith, I am expecting the 'scientific advisory panel' to include the diverse

viewpoints enjoyed in the NJFTF.

I am not sure what issue Req 12 is attempting to solve. The DEP should continue to do a lot of things, why single out fire? What is meant by 'fully implement'? Req 15 still leaves a money incentive for harvesting whether the goal is explicitly stated or not.

Lastly, planning should always keep in mind the objective and an idea of what success looks like in meeting those objectives. Potential adverse effects should also be documented."

Name of Submitter: Constance Katzenbach

County of Residence: Mercer

Affiliated Organization:

We are generally in support of the Task Force framework. We do have reservations regarding #13 and the endorsement of proposed Bill S2186 which includes a list of plants to be prohibited, and an unwieldy and unfunded permitting process. That list erroneously includes sericea lespedeza, which is valuable and irreplaceable for small ruminant producers. However these objections do not preclude our overall support.

Name of Submitter: Wendy Mager

Credentials: Law degree

County of Residence: Mercer

Affiliated Organizations: NJCF, Friends of Princeton Open Space, Watershed Institute Advisory Board

Progress on invasive species, protecting natural areas, outlawing commercial logging and requiring science-based forest management are all great things.

Name of Submitter: Matt Polsky

Adjunct Professor

County of Residence: Warren

Affiliated Organization: H

"I support the final product of the NJFTF.

They did a very good job, overall, in what was an impossible task, with very different opinions amongst the participants. They found much more common ground than it often appeared possible.

I do wish some of my views were considered more than they were, but as someone with very different ideas, that historically often take years to enter the mainstream, that was not unexpected. And the group had very fixed topics upon which they wanted to focus. By the end, at least some of my ideas, at least in indirect form, found their way in, although that might have happened regardless.

This initiative is very important, even more so than just because of the given topic. It could be

a precedent for how NJ approaches other difficult issues.

In general, people had a chance to express themselves.

At least once, prominent experts on both sides of a key issue were brought in to discuss their perspectives.

This was an opportunity for those willing to learn some things.

Some reflection, post-completion, on the process itself, and how even it could be improved, could be valuable and would make it an even better precedent for other tough issues.

If there is a future effort to build on this work, the issues I wish it would focus more on are:

- Now that afforestation made its way in, what are some creative possibilities for it? Just because it was established that older, more mature trees are much better at sequestration, that doesn't mean young, newly established trees can't also have multiple benefits. It's not either-or
- More consideration of environmental justice, green jobs, civic science, research (All were originally missing, and it looked like they were rejected. But at least indirectly they came up by the end. However, much more might be possible.)
- Using Sustainability as a guiding framework, not just within one recommendation
- Allowing space for possible beneficial uses of invasives, especially as environments change and we may have to re-think things Where possible, and taking advantage of
- the precedent of this process, calls for routine rulemaking should seek to replicate some of what was done here."

Name of Submitter: Lindsey Kayman

Credentials: Masters Degree: Double Major -Air Pollution Control and Environmental Health Sciences, Certified Industrial Hygienist

County of Residence: Mercer

Affiliated Organization: NJ Environmental Lobby, Environmental Education Fund (not authorized rep for either of these organizations)

"I agree with many of the recommendations. However, these recommendations can amount to secretly expanding the kind of egregious logging being done in Sparta throughout the state. There is a total lack of transparency with respect to logging. Most people don't know that ""logging for ecological health"" means the clear-cutting and extensive thinning of the biggest trees as has been done in Sparta, NJ. There was never any data presented that this type of logging has any benefit to biodiversity. In fact, it was discussed that the 10 years of logging in Sparta failed in its objective of bringing back the golden winged warbler. There was extensive scientific studies presented that showed the harms of logging. There was never serious consideration that preserving forests can help sequester carbon and promote biodiversity. Pro-logging groups were invited to a DEP tour and discussion of unpublished data that were not made available to the rest of us. Why are we relying on unpublished data to damage our best control measure against climate change? Also, there are problems with transparency: the list of people on the task force was never provided but the number of members doubled in size after the deadline for joining. The framework was relabeled ""recommendations"" that

the chairs"believe enjoy broad agreement among diverse participants." This is false. Two surveys asked for feedback on each framework item but quantitative results were never provided. There was never consensus -to say that there is consensus about logging and wood removal is a lie. Logging and wood removal were the only issues that there was disagreement on and no one changed their point of view. "

Name of Submitter: John Parke

Credentials: Certified Senior Professional Wetland Scientist (SWS), Certified Ecologist (ESA), BA in Environmental Studies (Ramapo State College of NJ)

County of Residence: Warren

I support this proposal. NJ needs ecologically sound ACTIVE forest management along with other practices, but active management needs to be able to use all the tools in the tool box to be effective! We have a responsibility to ensure ecological forest health for not just climate related issues, but also for the numerous wildlife and plant species that make NJ special and in many cases, active management is the right choice, in some cases it may be the only choice. If a forest advisory council is made down the line, all persons and organization(s) nominated for it MUST be properly vetted before being appointed, and should be disqualified from serving on it if found to have, or are related to, an incident connected to being issued a violation, warning, summons, or N.O.V. associated with any NJDEP Land Use regulations, rules, or code. If I took anything from participating in this task force, it is sadly in my opinion, how dysfunctional, Machiavellian (in a real bad way), and out of touch in the science and other related ecological, social, cultural, and economical considerations that go into these discussions some of the groups are, or have become. The bully tactics, inflammatory rhetoric and misinformation campaigns by some in the task force made for a very distrustful and non-professional atmosphere that was toxic to many who were really trying to work with all to find consensus on the issues. Some groups and individuals could not even keep to the basic ground-rules of the task force and repeatedly broke the rules even when asked to stop. Those actions in my opinion were not productive, nor helped build trust amongst participants. Their bully-like actions truly cheapened the intent of why this task force was created. I found these actions to be undermining the very hope that we could work together for a better outcome and it ruined any chase for legitimate discussion on some topics. And political figures that actually entertain their misleading rhetoric, I personally have no use for also at this point. This exercise to "come to consensus" on something so big that will ultimately shape the future of our state in so many ways, as well as our natural heritage, clearly showed me that there is no place for bullies, hypocrites, deceivers, and distrustful manipulating tricksters at the table of environmental collaboration if we are truly going to make real progress in NJ.

Name of Submitter: Deborah J McConnell

Credentials: BA communications

County of Residence: Ocean

Affiliated Organization: Sierra Club, NJ Chapter Volunteer

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"In 1992, I saw the Devastation in Washington state of the clear cutting of forest land, I came home from this sight of entire mountains burned, and charred, with a feeling that has never left me. I have seen in My own county, the pinelands restored, although I have heard of the burning. To this date, I am a firm believer in the forests and the good they do."

Name of Submitter: David B. Donnelly

State Park Superintendent (Retired)

Credentials: BS - Natural Resource Management

County of Residence: Ocean

"A thank you first to all who worked on the 'Task Force'; all participants, invited speakers and especially Co-Chairs. I was originally told this project would be completed in the summer and here we are still typing in December; so special thanks to everyone for hanging in there!

I support the Task Force framework and I do believe we reached a point that we can move forward from. My main concern is Recommendation #16. My 27-yrs experience in the DEP has taught me that nothing gets done without proper resources. The Department has unfortunately become the under-funded, step-children of NJ Government. It Programs are used for pretty pictures to attract tourists, but then left to stagnate from exhausted investments and staffing levels alike. The DEP's original mission and vision has been lost for many years.

I feel there will be no success on any of the other fifteen recommendations unless elected officials put NJ's future ahead of their own careers and properly fund the DEP. As a Superintendent, I often got asked who was my favorite Park visitor. My response was always the same ""it is an 8-yr old child, born 30 years from now who comes into the Park long after I am gone and says ""wow, this place is amazingly full of plants and animals and things to do""!

I feel there is still hope as many talented and dedicated DEP staffers are still there who could pull this off, but the clock is ticking. It will take significant financial resources to get the DEP back up to speed and save the future of NJ's forests. "

Name of Submitter: Jeanne M. Fox

Adjunct Professor Columbia SIPA & Rutgers Bloustein; former BPU President, DEPE

Commissioner/Deputy Commissioner, EPA Region II Administrator

Credentials: BA Douglass College; JD Rutgers Law; Harvard JFK School Certificate; Adjunct Professor Columbia SIPA & Rutgers Bloustein

County of Residence: Middlesex

First and foremost I am grateful that this Task Force was convened due to the existential World Climate Crisis. New Jersey has long been a leader in this fight for the future. My personal

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purpose is to do my small part in the Climate struggle. I came into this Task Force effort with an open mind. To me, the prime issue for this Task Force and for the Legislature is how New Jersey can best mitigate GHG reductions. Clearly, carbon sequestration is a significant part of the mitigation efforts. So, the question is "how can we best sequester carbon with this existing public asset - our State forests." I will place more specific comments on that in the "DISSENT" section.

The final report has much to be commended and to most of it, I concur.

Invasive species that harm trees and other vegetation must be addressed now. The Invasive Species subgroup has developed an excellent proposal for the Legislature. I have the privilege of participating with this group of experts and am thrilled with their reasonable recommendations. The full Task Force concurred with the proposal.

Also, a significant reduction in our huge, destructive deer population must also be a high priority. In addition to vehicle impacts, they eat new growth in our forests. I also believe there is agreement on several Pinelands issues, e.g. prescribed burns approved by forest ecologists after the planning is concluded. A separate plan must be done for our precious and unique Pinelands. This plan, as with other plans must be based upon scientific peer-reviewed studies as well as include a robust public participation process. These important topics with recommendations are included in the final report.

I sincerely thank the Task Force Chairs for all their time and effort dedicated to this important effort. I am also personally gratified by the keen public interest. I haven't been very vocal during the Zoom meetings because there are so many participants who need to express their concerns and ideas. It's marvelous to know that so many New Jerseyans are concerned about this critical topic.

Appendix C. Dissenting Opinion

Following the conclusion of workgroup meetings and framework development, participants were given opportunity to express their final report commentary to be included in this report.

The listed comments are from participants and organizations who **disagree** with the framework. Participants were given 2500 characters.

A total of 41 responses for dissenting comments were recorded – 18 opinions from 16 organizations and 23 from individual participants representing themselves.

Dissenting Comments Signed by Organizations:

Many organizations designated a Task Force representative to participate on behalf of an organization's viewpoint. The authorized representative participated in surveys and represented the organization in discussions and in the consensus process. Some of them provided supporting opinions to the framework. Sixteen organizations provided a dissenting comment. Some organizations had more than one dissenting opinion – we received 18 dissenting opinions representing 16 organizations.

Organization: Animal Protection League of NJ (APLNJ)

Representative: Angi Metler

Affiliations with Other Organizations: League of Humane Voters of NJ

We oppose the framework in both the process of its adoption & conclusion. It is the status quo, vague, and relies on a "scientific advisory panel. Confirmation bias will play a role in adopting any forest policy using this criterion. Using the DEP rule-making process to dissent is wrong because the DEP adopts rules even when opposition is high. #15 allows for the sale of wood. This incentivizes cutting trees & removing wood. There is no ecological need for this, so remove the sale of wood. Increasing funding to the DEP is premature when the policies are in progress. The statement "all recommendations discussed above require funding" is untrue when some recommendations are vague, and some (i.e., cessation of deer feeding plots on state lands) requires no funding. We oppose prescribed burns for climate & health. It also creates deer habitat, thus growing the deer herd. We reject blaming deer for forest issues because the destruction is caused by other factors—developers and loggers fragment forests for commercial & residential expansion. Hunters in sync with the DEP use clearcutting to create edge habitats for deer. DEP also uses clearcutting & food plots to grow the deer herd. DEP works with private hunting clubs to plant deer-preferred crops and rewards them when they kill the biggest deer with the largest antlers in its annual deer classic. APLNJ objects to "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." The state should be reassessing its forest plans, so why wait for those plans to expire before adopting new plans that fight climate change, sequester carbon, protect trees, and preserve wildlife habitat?

The co-chairs wrote the framework. Communication was discouraged between members. The co-chairs decided which proposals would be included in the framework or discussed at meetings. The chat was disabled during Zoom calls, so the co-chairs controlled the discussion.

- Since members did not communicate, this framework does not represent the views of the NJFTF members.
- NJFTF deadlines for proposals & commenting on the final framework were limiting. Finalizing the framework during the December holidays was problematic.
- The voting process was opaque and unjust. While the votes of groups would count more than individuals is fair, some organizations were given more votes than others based on an unfair assessment of whether an organization's members count as "members."

Organization: **Empower NJ**

Representative: Ken Dolsky BA Physics

Affiliations with Other Organizations: Steering Committee EmpowerNJ, VP NJ Forest Watch, Co-leader
Don't Gas the Meadowlands Coalition

The framework was originally separate topics. The decision to compile them into a single document is greatly distorting readers' understanding of the positions of participants

This framework is now labeled as Recommendations that the leaders "believe enjoy broad agreement among diverse participants." This is false/misleading. Two surveys asked for feedback on each framework item but quantitative results were never revealed. THERE WAS NEVER ANY FORMAL CONSENSUS ON ANY ELEMENT OF THIS PROJECT. This allowed the leaders to imply agreement but it was never proven. We never agreed to call these Recommendations

This report is a consensus of the chairs, not the participants

As proof, consider item 15. The second sentence says it is OK to continue the logging on public forest land that brought about the task force. While appearing to follow DEP processes and produce beneficial actions, this is misleading: it is based on false science (regarding true biodiversity objectives and environmental and climate change impacts of wood removal), incomplete and biased assessment of the harms/benefits tradeoffs of these activities, revenue generation for private entities (from land purchased with public funds) and no recognition of the importance of public forests in efforts to mitigate climate change. It is not based on any experiential evidence demonstrating that cutting and selling wood products achieves climate goals.

The framework fails to address a primary goal of this task force-an effective response to climate change through forest management. It offers only lip service to climate change filled with loopholes. It offers no plan to manage logging impacts on carbon storage and sequestration and the leaders refused to include proforestation, which many of us support and refused to even consider a moratorium on logging despite many calls for this during the task force meetings.

None of the following key science findings made it into the Framework:

- New insights on carbon sequestration being a function of leaf area (with trees increasing or holding steady on sequestration for hundreds of years)
- Newly logged areas being net emitters of carbon for decades
- The ecological importance of leaving cut wood on the ground and lack of need to remove wood for any ecological purpose

Not including any of these scientific principles has deliberately deprived us of the ability to support such principles and the Framework has many more negative than positive positions.

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Organization: **Environmental Education Fund**

Representative: Erica Cowper BS in Biology from Drew University

Pursuing MS in Earth & Environmental Science from Lehigh University

Affiliations with Other Organizations: New Jersey Environmental Lobby

This framework seems to be more of a consensus of the chairs, not the participants. The framework fails to address the primary goal of this task force, to address climate change through forest management. It does not offer a plan to manage the impacts of logging on carbon storage & sequestration. Many members of the task force, including myself, called for a moratorium on logging until a (real) consensus was found, but this was refused by the chairs. Several points, supported by recent science, were left out of this framework including carbon sequestration as a function of leaf area, newly logged areas being net emitters of carbon dioxide for decades, and the ecological importance of leaving fallen or cut trees.

Organization: Friends of the Drew Forests

Representative: Judy Kroll

Affiliations with Other Organizations: Yes. Friends of the Drew Forest

The Friends of Drew Forest (FODF), an all volunteer 501c 3 corporation cannot support the proposed framework of the NJ Forest Task Force for the following reasons:

- The framework, though thoroughly reviewed and commented upon extensively, fails to protect NJ public forests, including mature native forests, from current and on-going desecration, including logging, clearing of tree canopy, egregious destruction of forest floors from heavy machinery and large vehicles, removal of logs and resulting devastation to wildlife habitat. In fact, the framework contains the following caveat on page one: "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." FODF's volunteers joined the Task Force to try to mitigate these exact practices, and were vocal and consistent about this critical need, so it is unfortunate that the Task Force Co-Leaders instead chose to codify the status quo.
- Old forests provide the most climate carbon capture, and are critical to mitigation of our growing climate crisis. Climate change MUST be foremost in any policy making and implementation. To avoid worsening climate change, our public forest policies must: stop cutting mature native trees, stop clearing the canopy, and stop removing logs, stop clearing old forests to grow young forest. The scientific proof for large trees sequestering the most carbon is unquestionable.
- The framework contains far too many vague and undefined terms, leaving many opportunities for interpretations that will not support the goal NJFTF was given in the first place.

Organization: Friends of the Drew Forests

Representative: Sara Webb Ph.D. Ecology, M.S. Ecology and Forest Resources

Affiliations with Other Organizations: Trustee Highlands Coalition

This Task Force was created in response to widespread citizen concern about logging of northern NJ's public forests. This practice steeply depletes climate resilience and sacrifices forest-interior biodiversity, where deer and invasive species prevent recovery.

Unfortunately, the proposed framework fails to address these concerns. No protection from short-sighted logging management is called for despite our public forests' great importance today, both for climate defense and for the species reliant on unfragmented mature forests. Proforestation, protecting mature trees for climate defense, was supported by a vast majority of the task force in an early straw poll.

But logging policy is missing from the Framework and was not voted on, though it is a central issue and focus of many proposals. Science is clear: logging our most mature, carbon-rich forests sacrifices both climate defense and biodiversity. Ignoring these concerns in the Framework perpetuates the status quo of problematic deforestation. The Framework offers loopholes and vague language that permit canopy clearance, when it should center on canopy protection. Task force participants submitted extensive research on this subject.

For climate resilience, large trees and mature forests absorb AND store the most planet-warming carbon, per tree and per acre, far more than young or managed forests. This carbon is stored for centuries, and sequestration rates and storage increase exponentially with age for 87% of tree species.

Biodiversity in northern NJ is also threatened by today's logging approach and wood removal, which deplete habitat and soil organic matter. Forest interior species are far more threatened than those of New Jersey's abundant openings and edges, especially as the climate warms. Any creation of young forest habitat should not carve out century-old forests but use New Jersey's abundant young invaded woods and clearings. We support efforts to control deer and invasive species, and emphasize that both threats are exacerbated by opening the canopy. Canopy clearance and the mechanized transport and harvest of timber also impact soil, hydrology, water, vernal pools, and the future forest of young trees. We hope the Task Force report will strongly support ecological stability and restrict intensive management that impairs biodiversity in this time of a warming climate.

Organization: Great Swamp Watershed Association

Representative: Dorothea Stillinger

Affiliations with Other Organizations: Great Swamp Watershed Association, NE Forest Watch

Great Swamp Watershed Association's comments on the New Jersey Forest Task Force's final recommendations

(D.K. Stillinger 12-18-22)

1. Very good. Except: Scientific advisory panel must include a forest ecologist plus research professionals in a number no less than equal to the number of individuals certified in commercial forest and timber management.

2. Very good. Except: Until the rule making is complete there has to be a moratorium on logging on public forests.

3. Very good. Except: The statement should read "newly initiated plans will not be approved until the interim rule making is complete." It makes no sense to allow unapproved plans to proceed.

4. Excellent. Well done and badly needed.

5. This item is essentially included in Item 1 so is not needed. As written it is vague and poorly worded and uses jargon. Item 5 should be a clearly worded outline for how public forests can sequester carbon plus the addition of broad immediate and long term goals with requirements to publish results annually.

6. Very good. Commendable and needed.

7. Not needed since it is assumed under Item 6. As written Item 7 uses catch phrases that are not defined and are susceptible to misinterpretation.

8. The first sentence again uses jargon and undefined terms, is implied by other items and should be eliminated. The second sentence is imperative.

9. Excellent.

10. Eliminate the term "ecological health." It is meaningless unless carefully defined. Otherwise very good.

11. Redundant and should be eliminated. Included in other items.

12. Good. The use of fire badly needs to be reevaluated.

13. Excellent.

14. Excellent.

15. Eliminate the third sentence. It includes specifics that should be decided within individual plans rather than in a broad framework. In any event there should be no cutting, removal or sale of wood on and from public forests without public input, peer-reviewed scientific justification, and adherence to restrictions in all documents and deeds, Green Acres restrictions, and wetlands restrictions for the specific tract. Again, the term "ecological health" should not be used unless well defined.

16. Excellent.

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Organization: **Highlands Coalition**

Representative: Elliott Ruga

Affiliations with Other Organizations: No

Rec. 1: Without additional language and clarification this recommendation has the potential to cause more harm than good. Specifically, the scientific advisory panel should be independent from the NJDEP and must include a balance of experts from biology, ecology, forestry, and wildlife biology such that no group is overrepresented while maintaining an appropriate span of expertise.

Rec. 7: We agree that at times an intervention is necessary, however, we disagree with the recommendation as stated because active management implies that timber is allowed to be removed from the forest for the purposes mentioned, which we oppose.

Rec. 15: We disagree. This recommendation is egregiously misleading by seeming to prohibit an activity that most agree is wrong in publicly owned forests, commercial timber harvesting. Then, the same activity, timber harvesting, is sanctioned if it is done in service of ecological goals. Today, forest management plans justify timber harvesting to achieve spurious ecological goals, or for legitimate ecological goals that could be accomplished with non-harvest alternatives, i.e., alternatives without the adverse impacts of mechanized harvesting and wood removal. This recommendation upholds the status quo and the continued adverse impacts of timber harvesting in our public forests.

Organization: **League of Humane Voters of NJ**

Representative: Doris Lin B.S. in Applied Biological Sciences, Massachusetts Institute of Technology
J.D., University of Southern California Law School

Affiliations with Other Organizations: Legal Director, League of Humane Voters of NJ, Animal Protection League

The League of Humane Voters of New Jersey (LOHVNJ) objects to the NJ Forestry Task Force framework and to the process by which it was adopted.

The framework is vague and leaves too much discretion to a "scientific advisory panel." Science is not policy.

The reliance on public comments in the rulemaking process is misplaced. NJDEP has a history of adopting rules despite overwhelming public opposition.

Recommendation 15 creates an incentive to cut trees and remove wood. There is no ecological reason to remove wood, so allowing the sale should not be recommended at all.

Increasing funding to NJDEP is premature when the policies have not been developed yet. Some recommendations are vague and others (i.e. ending deer feeding plots) require no funding.

We object to prescribed burns, which create the edge habitat that is preferred by deer.

Furthermore, regarding deer, NJDEP has been managing state wildlife management areas for decades to increase the deer herd and grow trophy bucks through prescribed burns and clearcutting (to create edge habitat), food plots for deer and farm leases that require farmers to leave crops standing for deer.

NJDEP partners with hunting clubs to plant food plots for deer, and then gives awards to hunters who kill bucks with the biggest racks. The sale/donation of venison has nothing to do with reducing the deer herd when NJDEP keeps the deer herd artificially abundant for hunters.

We object to the statement that the recommendations are not intended to interfere with current forest management plans. The state should reassess their plans and there is no reason to wait.

LOHVNJ objects to the process of the task force. Task force members (TFMs) could submit proposals, but were not allowed to communicate with each other and were not allowed to author any part of the framework.

The entire framework was written by the co-chairs. TFMs were prohibited from emailing all other members, and chat among members was disabled during the Zoom calls. When a TFM was allowed to present their proposal, there was no vote on the proposal. The co-chairs decided how, if at all, a proposal would be included.

Also, the voting process is opaque and unjust, because some groups were given more votes than others based on an unfair assessment of whether a group's members count as "members."

Lastly, we were given unrealistically short deadlines and character limits, over holiday weekends, for submitting proposals and comments. (abbreviated to 2500 characters)

80x

Organization: **National Wild Turkey Federation, NJ Chapter**

Representative: Miriam Dunne B.S. Natural Resource Management (Cook College, Rutgers University,
M.S. Biology (E. Stroudsburg University

Affiliations with Other Organizations: no

Our forests need management, and we cannot wait until a formal rulemaking process is developed for existing plans to be implemented. Several wildlife species of special conservation concern are on the brink of requiring listing as threatened or endangered. Further delays in active forest management to address the needs of these species will result in continued declines in their populations. The state has expended considerable resources to develop plans for forests and Wildlife Management Areas. These plans have been vetted internally and externally and represent sound science. All existing plans should be able to be implemented with no "interim rule making process" to delay their implementation. Likewise DEP should not be prevented from finishing any plans that are in process while an interim process is developed. This delay tactic only serves the anti-management factions who don't believe that forest management can be beneficial for wildlife. There is, indeed, so little actual management taking place at present on state land that discussion of a moratorium on management is laughable. DEP needs to be encouraged to continue management as it has been doing with a robust internal vetting process, and an outreach effort that informs the public as is appropriate and seeks public input. Getting public consensus on stewardship plans will be impossible and it will have to be acknowledged that if biodiversity and forest health is a goal then some trees will have to be cut. It is hoped that the experts at DEP and other advisory professionals will prevail and enable the state to do the management necessary to protect biodiversity and ultimately benefit climate.

We do not support expanding the existing Natural Areas Program. Some NA represent unique habitats but many are designated arbitrarily and are no more unique than their surrounding landscape. Having more robust mapping for unique plant communities, and increasing communication within DEP between the NA manager and the program managers in P&F and DFW would be more beneficial to encouraging sound protection and management of these areas. Likewise we do not support the addition of an oversight council for old growth/carbon reserves. Since 99% of public land is not managed at present, there is a huge advantage to future old growth development. The planning process will identify older stands that can represent future old growth, and indeed define what is meant by old growth.

Organization: **NJ Forest Watch**

Representative: Silvia Solaun MS

Affiliations with Other Organizations: Yes

NJ Forest Watch CANNOT Support the Framework. NJ public forests need to be held to HIGHER Standards. The "Final" framework is biased and not representative of the public stakeholders and has misleading language of which allows the "status quo" to prevail. -Does not describe a plan to use forests to mitigate climate change by protecting and setting aside ALL of the 1M acres of public forests for climate change.-Excludes the concept of Proforestation and it was ridiculous how actual peer-reviewed science has been ignored. -Excludes the use of a moratorium and allows the foresters and NJ Audubon to continue to write plans on public lands with no rules or regulations. -Excludes the use of peer-reviewed science, in particular on carbon sequestration being a function of leaf area (with trees increasing or holding steady on sequestration for hundreds of years), newly logged areas being net emitters of carbon for decades, the ecological importance of leaving cut wood on the ground and lack of need to remove wood for any ecological purpose. -The timeframe for new regulations is too long. We want forest protections NOW. Public forests, like on Sparta Mtn are being destroyed now. Purposely put within the framework are buzz words like "ecological health" and these are too vague and allow the status quo to continue. Instead, NJ should enact a "Forever Wild" component to ALL of the 1 M acres of public lands as the climate crisis is real and cutting more forests down, is exacerbating the issue. Now on with the issues with the NJFTF process as stated in our previous comments but worthy of repetition: More than half of the taskforce chairs & their organizations benefit from the writing, implementation and "stewardship" of public lands. This demonstrates that the taskforce is represented by biased, and financially motivated groups. These financial motives of these groups are for "self preservation" & are not in the best interest of the public! The Taskforce did not use promised consensus process, but instead only used surveys. There was never a reveal of last 2 rounds of surveys on the framework. Instead, all participants should have full disclosure of who participated in the surveys, and NO outside agencies should have been allowed to participate. There was never a debate process. There was no peer reviewed Science presented, instead it was all SPIN manufactured by the groups who benefit from the writing and implementation of logging plans throughout the state.

Organization: **NJ Outdoor Alliance PAC**

Representative: Larry Herrighty B.S. Wildlife Managment

Affiliations with Other Organizations: New Jersey Outdoor Alliance PAC, Nj Hunters Helping The Hungry, Nj State Federation Of Sportsmen's Clubs

The New Jersey Outdoor Alliance (NJOA) does not support the following recommendations:

Recommendation (R) 1. NJOA does not believe that DEP needs to be "directed" to initiate statewide planning and mapping of forest lands. DEP is already conducting these activities but is restrained by a lack of funding.

R 2. NJOA is satisfied with the 14-step process currently used by DEP to create Forest Management Plans.

R 3. NJOA does not believe rule-making is necessary for the DEP process of creating forest management plans and recognizes a thorough public process exists within the existing process.

R 7. NJOA does not believe DEP needs to be "directed" to identify where to practice active forest management since such management is already practiced to meet stated objectives.

R 11. NJOA believes the current DEP process is adequate and rulemaking is not necessary.

R 13. NJOA does not believe DEP needs to be "directed" to amplify efforts to combat invasive species. DEP's efforts are constrained by funding which should be increased to fully implement their effort.

R 14. NJOA does not believe the Science Advisory Panel is needed to guide DEP deer management as a public process through the Fish and Game Council rulemaking is adequate. Predators such as bobcats, bears and coyotes prey on deer. However, increasing bear and coyote populations such in order to manage deer in an undefined "deep forest" puts public safety at risk and is not necessary. The Fish and Game Council has already adopted regulations to allow fertility control of isolated deer populations. Fertility control has been proven to be ineffective on deer populations over the general landscape. NJOA opposes the development of a pilot program for commercial use of deer because it is not needed, it is inconsistent with the North American Model of Wildlife Conservation, is not cost-effective and no infrastructure for processing deer commercially exists in NJ or if created, likely not to be profitable. It is an inappropriate use of a public resource on public land. Recreational deer hunting is the most cost-effective means of controlling deer and when conducted on public land and unimpeded, has resulted in the ability to regenerate forests. The Fish and Game Council has the authority to adjust deer season length and bag limit if necessary to promote forest health.

R 15. DEP has not made commercial use of forest products as a primary goal in any forest management plan, therefore R 15 is not needed.

Organization: NY NJ Trail Conference

Representative: Timothy McKenna 25 years as an executive in the paper and forest product industry

Affiliations with Other Organizations:

While there are a number of valuable recommendations in the NJFTF Framework“ particularly the recommendations that the state DEP develop regulations governing forests and conduct an inventory of our public forests“the Framework presents a problem for those whose highest goal is to foster and preserve mature forests on New Jersey’s public lands. Those of us on the conservation side of the issue believe that the crucial task is to halt current damage to our public forests created by logging and tree removal. The current framework leaves many of the critical concepts such as active management, protection and reforestation loosely defined such that they can be interpreted to justify the current status quo in NJ forests which most Task Force members oppose. Furthermore, the NY-NY Trail Conference, which I represent, strongly believes that our public forests, in a small, densely populated state, were set aside for the good of the public and those forests should be allowed to flourish in their natural state to provide recreation and appreciation of nature for as many as possible. As a former executive in the forest industry, I fully recognize there is a need for wood products and for cultivating tree farms that supply those products. However, I am also convinced that in New Jersey in natural areas set aside for the benefit of the public the highest and best use is to leave the forests in their natural state. I respectfully submit our comments and am grateful to the leaders and the Senator for establishing the task force, but I am convinced there is more work to do.

84x

Organization: **Raritan Headwaters Association**

Representative: William Kibler J.D.

Affiliations with Other Organizations: Raritan Headwaters

We support a pause on all new management plan approvals beginning immediately. We support a pause on current and new forest management projects until the legislative process has been completed and rules are adopted and implemented consistent with a robust public input process.

Organization: Ridge and Valley Conservancy

Representative: Christine Hepburn Ph.D. in Psychology (relevant for evaluating scientific papers)

Affiliations with Other Organizations: Ridge and Valley Conservancy, Friends of the Drew Forest

Despite agreeing with many of the Framework's Recommendations, RVC dissents from the Framework overall because:

The Framework does not express an overarching rationale or vision for the codification of the management of New Jersey's public forests. RVC believes that the primary rationale should be climate defense. In view of the existential crisis posed by climate change, and the indispensable role that trees play in carbon storage, all forest management activities should support this role. No activities should decrease a forest's contribution to climate mitigation, except for invasive species control. But the Framework nowhere recommends a prohibition on cutting of large trees and on removal of wood. Recommendation 10 for managing forests "as necessary to advance state climate goals" is weakened by the loophole of managing for other "equally important goals," when fully protecting forests for their climate-defense capabilities would automatically advance these other goals. The extensive tree cutting on Sparta Mountain WMA "purportedly done to enhance biodiversity" is an example of how this loophole can be exploited. Implementing policies based on climate defense would require DEP to rethink its approach to forest management, rejecting timber-production forestry methods in favor of proforestation, which allows for a variety of activities that do not involve significant tree-cutting or removal of wood. DEP is likely to resist such a paradigm shift and unlikely to effectively implement a statute that is not clearly based on a vision that demands change.

The Framework is not science-based. All efforts at introducing scientific proforestation concepts and language to the Framework were rejected. Many proposals for science-based management were never allowed to be discussed. The Framework's vague language (e.g., management for "future threats to ecological health") sounds good but would allow continuation of the current practice of logging mature forest timber under the guise, for example, of habitat creation for early successional bird species.

The Framework does not suspend already approved/ongoing logging activities on public forests prior to completion of rulemaking. The proposed rulemaking processes are welcome, as virtually no rules exist governing forestry on public lands. But given the 3-year window allowed for DEP rulemaking, this delay could allow for extensive areas of further logging in public forests, such as on Sparta Mountain WMA.

Organization: **Ridge and Valley Conservancy**

Representative: Susi Tilley Executive Director, Ridge and Valley Conservancy

Affiliations with Other Organizations: I am representing Ridge and Valley Conservancy's Board of Trustees

The Explanatory Statement for No Vote on the Forestry Task Force Conceptual Framework of Recommendations and the reasons despite agreeing in general with Recommendations 1, 2, 3, 4, 5, 9, 11, 12, 13, 14, and 16 in the Conceptual Framework of Recommendations will be emailed separately to the Task Force because it exceeds the 2500 characters allowed in this Google Form.

Organization: **Sourland Conservancy**

Representative: Joe Kazimierczyk

Affiliations with Other Organizations: Sourland Conservancy

Sourland Conservancy has concerns about recommendations regarding the time-frame for implementation. As currently written, the framework would allow new plans using existing questionable practices to proceed, if interim rules are not propagated within one year.

Another concern is that allowing the sale of wood products could become a loophole for commercial logging, and we hope that subsequent rules and legislation will prevent this.

Finally, we hope that the use of "ecological restoration" would not be used as a reason to fragment existing older growth forests.

Overall the Framework is an improvement over the exiting state of affairs, but we don't think it goes far enough.

88x

Organization: **Support Roaring Rock Park**

Representative: Laura Oltman

Affiliations with Other Organizations: Support Roaring Rock Park, New Jersey Highlands Coalition

My comment on every round of feedback on this framework is that it lacks any statements of goals or policy to guide management decisions. This is a critical failing no matter what the desired outcome. No one knows for sure what the management recommendations should accomplish and therefore we have no assurance they won't result in damage to our forests. There is too much vague language around tree removal, leaving the likelihood that the door will be as least as wide open to timber harvesting after all this deliberation as it was before, and that is pretty wide open. Right now timber harvesting by itself is being described in logging plans as a conservation purpose to make trees in the forest more healthy. I strongly disagree with that position.

I strongly support the emphasis in the framework on the need to create regulations for forest management on public lands but that does not overcome my objections to other aspects of the framework. I don't know how regulations can be guided without a clear statement of policy.

Organization: Thonet Associates

Representative: John Thonet BS & MS degrees in Forestry, SUNY College of Environmental Science and Forestry; Licensed Professional Engineer and Professional Planner in New Jersey

Affiliations with Other Organizations: Thonet Associates, Inc.; Association of New Jersey Environmental Commissions; New Jersey Highlands Coalitions; New Jersey Environmental Lobby.

Thonet Associates does not agree with Recommendations 7, 8, and 15 mostly because the NJFTF has acknowledged that evaluating "the science" is beyond its capabilities, and yet the NJFTF's recommendation nos. 7, 8, and 15, require some knowledge of "the science.." without which the NJFTF does not have an informed basis for making those recommendations.

Nonetheless, Thonet Associates supports Recommendation nodes 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, and 16, which represent over 80% of the NJFTF's recommendations, and thanks the NJFTF for its efforts to achieve consensus.

Cynthia Soroka-Dunn

AS Broadcasting Bergen Community College, BA Communications SUNY New Paltz

Feel that this group doesn't consider the opinions of the group. Feel that anything that is said that doesn't agree with the people that head up this group they ignore. It is very upsetting and don't feel they are at all what they are supposed to be. They are slanted in their opinion to their own agenda and not what the people of NJ feel is right.

Nicholas Homyak

Volunteer in Parks since 1976 officially Member Invasives Strike Force

1: Inventory Planing: It must include terrestrial ecologist, not forester. What would the need of a forester be on a science advisory panel; especially if means silviculture, or obtaining wood-products. The Term must be clarified specifically in it's meaning. Forest Manage themselves through the phenomena of self-organization. Forestry is a form of disturbance, which weakens ecosystem biodiversity, and spreads invasive species through that disturbance.

2. 3-years is too long. Immediate set asides should be earmarked for all Public Forest Remaining, as their ecological services, (free of charge) are already working to mitigate climate change due to humans. Forests are important because they are removing nearly 30% of our emissions annually - the most of any ecosystem. They also store vast quantities of carbon in the wood of trees and in forest soils. It has been found that managing forest differently to let more trees reach a large size could store twice as much as they do.

Current practice of sustainable forestry - if it were practiced everywhere would keep the amount of carbon in forests forever at the current level. We need to be increasing the carbon stored in forests by proforestation management- letting more trees grow without harvest. Proforestation somehow has escaped this Task Force as a management Paradigm; Why?

3. logging or tree removal must not take place. This Recommendation seems unnecessary. The matter at hand for guidelines should be immediate Public Forest set asides, and a moratorium forbidding logging, or habitat creation through silviculture guise or ploys. Proforestation.

5. Proforestation as a compliment to afforestation and reforestation is absent.

6. Has loop-holes to continue disturbance activities within the 'ecological reserves", what is an ecological or safety threat in a forest reserve; especially in the Northern NJ Forest?

15. Is double talk. logging for ecological health, is absurd. The disturbance of ingress and egress and the required disciplines of any work force will surely injure and further contaminate any public forest remaining. Any disturbance should be for invasive curtailments and natural enhancements where the effort and cost would be worth it.

The Task Force overall has slipped away from the major background of it's intention. Climate Change or the role Forest can and do play in climate mitigation, through their ecological services and powers of self-organization. Proforestation a must.

jean publiee

many credits after b.s.

this committe was never fair. it did not listen to the attendees. it had its own agenda that was followed and was very unamerican in its treatmetn of attendees. in america, everybody is listned to. this group was determined to never listen to anybody but those it wanted to. the rest were disrespected

Renee Becker
private citizen

We failed Senator Smith. We were tasked to recommend proposals on how to mitigate the effects of climate change as our number one priority. However our meetings focused mainly on finding items of consensus. I commend our co-chairs for their tireless efforts. But the elephant in the room (climate change) was sidelined.

National Geographic's Magazine Special Issue "Saving Forests – They're Key to Protecting the Planet, Now They Need Our Help" contained a wealth of data. In its 144 pages, not one article refers to "clear cutting" or "creating young forests" as a solution. This magazine, a scientific authority, contained undisputed evidence that we need to put an end to logging. New Jerseyans deserve better. We need to create a moratorium to logging of Sparta Mountain and elsewhere in the state.

The American Legislative Exchange Council (ALEC) created terms such as "young forests" "healthy forests" or "clear cutting". This organization helps provide legislative bills for our congressmen. A major contributor to this group is David Koch, the owner of "Brawny" and other paper products. Koch is a proponent of logging. And ALEC promotes these terms. This is a marketing ploy to turn a negative (logging) into a positive (clear cutting). As a retired advertising executive, I know the jargon. And it works. Nonsense, don't let it fool us!

Some people may feel that revenue generated through logging creates opportunities to fund worthwhile projects. Raising money from commercial logging is short sighted. We need to protect our assets (our forests) now more than ever. The means does not justify the end. Once our most desirable trees are harvested they are gone forever. If there is a need to generate revenue, then we should grow tree farms for the purpose of harvesting timber as being done by the Wawayanda Tree Farm in Vernon.

Joe Basralian

BA, Cornell University; MBA, NYU; 23 years in financial services; 5 years in nature conservation; Rutgers Environmental Steward; Rutgers Cooperative Extension environmental coursework; Reader of 80 books on environmental conservation since 2014

Totally ineffectual wording of Recommendation #15 risks making the rest of the Framework look mostly like a fancy obfuscation to allow more materials removal for private gain from our public forestland. Several vocal participants of the NJFTF made it clear that they benefit financially -- personally and professionally -- from removing material from forests that belong to us taxpayers. At no point did these participants make formal disclosures of their conflict of interest. I also learned that New Jersey Audubon gets paid handsomely -- like a private consulting firm would -- for tagging trees for removal; yet NJA made zero disclosure of the revenue it makes from materials removal our public forests. This is one example of the conflict of interest evident during the NJFTF process.

Given that NJA and a forester who removes materials for private gain comprised half the members of the NJFTF, the odds were stacked against the 9 million New Jersey residents who have paid to protect our *public* forest land. This fundamental problem undermines the NJFTF's call for more stewardship on public land, reminds that the conflicts of interest are five in Administrative Procedures too (Recommendation #2, 3, 11), and tells me that any portion of NJ's publicly owned forests that don't receive additional protections will be left more vulnerable than before to streamlined forest products removal-for-private-financial-benefit.

This can be avoided if Recommendation #15 is re-worded to be given meaning. The current wording imposes absolutely no restriction on forest products removal for private gain. The word "should" invalidates the entire Recommendation (since it doesn't say "must"). The qualifier "as a goal" also invalidates the entire Recommendation because any actor can say, "that's not our goal".

Recommendation #15 ought to say, "As a condition to any updated public forest management rules, the NJDEP must prohibit sale or trade of forest materials

on public land." Anything other than strong, clear wording like that opens up more of our public forests to private gain, even as the Framework may add additional rationale for protecting a portion of public land.

I believe that an unconflicted version of the NJFTF would have further developed and expanded recommendations #16, 14, 13, 12. Let us urge the Legislature to take these up with gusto.

John Miraglia

none

Great recommendations are included in this Framework. CONGRATS to its contributors and authors. In several of the the recommendations carbon sequestration is consistently featured first as a benefit and goal. However, for many consumptive and non-consumptive users of NJ's forests other goals might have a higher priority, biodiversity for example. Given that the recommendations will require NJ citizen support to be funded & implemented, I have 2 recommendations: 1. rotate featuring other goals in the Framework, 2. while professionals in related fields should dominate execution of the recommendations, a greater variety of user groups interested in NJ forests should be included in developing & implementing the Framework's plans. Notably absent from the Framework sponsors are organizations representing non-commercial consumptive users of our forests...hunters and anglers. On a related note, deer are the only animals specifically noted in the Framework. But NJ has issues/interests in other species: decline of several upland bird and none game species for example. Any action (or non-action) taken in our forests will have positive or negative impacts on different species. Recommendations or impacts on those threatened species should be included in any forest plan also.

Ken Dolsky

BA Physics

The framework was originally separate topics. The decision to compile them into a single document is greatly distorting readers' understanding of the positions of participants

This framework is now labeled as Recommendations that the leaders "believe enjoy broad agreement among diverse participants." This is false/misleading. Two surveys asked for feedback on each framework item but quantitative results were never revealed. THERE WAS NEVER ANY FORMAL CONSENSUS ON ANY ELEMENT OF THIS PROJECT. This allowed the leaders to imply agreement but it was never proven. We never agreed to call these Recommendations

This report is a consensus of the chairs, not the participants

As proof, consider item 15. The second sentence says it is OK to continue the logging on public forest land that brought about the task force. While appearing to follow DEP processes and produce beneficial actions, this is misleading: it is based on false science (regarding true biodiversity objectives and environmental and climate change impacts of wood removal), incomplete and biased assessment of the harms/benefits tradeoffs of these activities, revenue generation for private entities (from land purchased with public funds) and no recognition of the importance of public forests in efforts to mitigate climate change. It is not based on any experiential evidence demonstrating that cutting and selling wood products achieves climate goals.

The framework fails to address a primary goal of this task force-an effective response to climate change through forest management. It offers only lip service to climate change filled with loopholes. It offers no plan to manage logging impacts on carbon storage and sequestration and the leaders refused to include proforestation, which many of us support and refused to even consider a moratorium on logging despite many calls for this during the task force meetings.

None of the following key science findings made it into the Framework:

- New insights on carbon sequestration being a function of leaf area (with trees increasing or holding steady on sequestration for hundreds of years)
- Newly logged areas being net emitters of carbon for decades
- The ecological importance of leaving cut wood on the ground and lack of need to remove wood for any ecological purpose

Not including any of these scientific principles has deliberately deprived us of the ability to support such principles and the Framework has many more negative than positive positions.

96x

Ally Karanikas

The NJ Student Sustainability Coalition does not approve of the framework and report.

John Thonet

BS & MS degrees in Forestry, SUNY College of Environmental Science and Forestry; Licensed Professional Engineer and Professional Planner in New Jersey

Thonet Associates does not agree with Recommendations 7, 8, and 15 mostly because the NJFTF has acknowledged that evaluating "the science" is beyond its capabilities , and yet the NJFTF's recommendation nos. 7, 8. and 15, require some knowledge of "the science.." without which the NJFTF does not have an informed basis for making those recommendations.

Nonetheless, Thonet Associates supports Recommendation nods. 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, and 16, which represent over 80% of the NJFTF's recommendations, and thanks the NJFTF for its efforts to achieve consensus.

98x

susan michniewski

NA

There are many things to like about the framework, including the proposals for deer and invasive species management. However, the framework does not go far enough in changing the current practices of logging on our public lands. Regulations are needed which put proforestation as the goal for managing public forests. The framework proposes rules be adopted within 3 years, which is reasonable. However, the proposed interim plan is not adequate as it allows for the current policies to continue if interim regulations are not adopted within 1 year. Having interim rules adopted in 1 year is highly unlikely due to the need to formulate those regulations, go through internal review, and then public review. I believe that a moratorium is needed to prevent the approval of plans that allow for mechanized logging until such time that formal rules are adopted which prioritize proforestation as the goal. No large native trees or mature forests should be logged, such as being done at Sparta Mountain. No large trees or mature forests should be cut to create "young forest". Climate mitigation and the ecological benefit of mature forests should be our priority.

99x

Laura Oltman

My comment on every round of feedback on this framework is that it lacks any statements of goals or policy to guide management decisions. This is a critical failing no matter what the desired outcome. No one knows for sure what the management recommendations should accomplish and therefore we have no assurance they won't result in damage to our forests. There is too much vague language around tree removal, leaving the likelihood that the door will be as least as wide open to timber harvesting after all this deliberation as it was before, and that is pretty wide open. Right now timber harvesting by itself is being described in logging plans as a conservation purpose to make trees in the forest more healthy. I strongly disagree with that position.

I strongly support the emphasis in the framework on the need to create regulations for forest management on public lands but that does not overcome my objections to other aspects of the framework. I don't know how regulations can be guided without a clear statement of policy.

100x

Kate Krehel

While I can support some of the individual recommendations, I feel that the framework is too broad to support overall. I think it needs to go further to fully and adequately respond to our extremely pressing climate crisis. There is global scientific consensus that forests are our best defense against climate change, and so it should ensure the protection of our forests to a greater degree in order to stray from the status quo and effectively respond to this climate crisis and help prevent species extinction.

lolx

Timothy McKenna

25 years as an executive in the paper and forest product industry

While there are a number of valuable recommendations in the NJFTF Framework particularly the recommendations that the state DEP develop regulations governing forests and conduct an inventory of our public forests the Framework presents a problem for those whose highest goal is to foster and preserve mature forests on New Jersey's public lands. Those of us on the conservation side of the issue believe that the crucial task is to halt current damage to our public forests created by logging and tree removal. The current framework leaves many of the critical concepts such as active management, protection and reforestation loosely defined such that they can be interpreted to justify the current status quo in NJ forests which most Task Force members oppose. Furthermore, the NY-NY Trail Conference, which I represent, strongly believes that our public forests, in a small, densely populated state, were set aside for the good of the public and those forests should be allowed to flourish in their natural state to provide recreation and appreciation of nature for as many as possible. As a former executive in the forest industry, I fully recognize there is a need for wood products and for cultivating tree farms that supply those products. However, I am also convinced that in New Jersey in natural areas set aside for the benefit of the public the highest and best use is to leave the forests in their natural state. I respectfully submit our comments and am grateful to the leaders and the Senator for establishing the task force, but I am convinced there is more work to do.

Erica Cowper

BS in Biology from Drew University

Pursuing MS in Earth & Environmental Science from Lehigh University

This framework seems to be more of a consensus of the chairs, not the participants. The framework fails to address the primary goal of this task force, to address climate change through forest management. It does not offer a plan to manage the impacts of logging on carbon storage & sequestration. Many members of the task force, including myself, called for a moratorium on logging until a (real) consensus was found, but this was refused by the chairs. Several points, supported by recent science, were left out of this framework including carbon sequestration as a function of leaf area, newly logged areas being net emitters of carbon dioxide for decades, and the ecological importance of leaving fallen or cut trees.

103x

Dorothea Stillinger

Great Swamp Watershed Association's comments on the New Jersey Forest Task Force's final recommendations

(D.K. Stillinger 12-18-22)

1. Very good. Except: Scientific advisory panel must include a forest ecologist plus research professionals in a number no less than equal to the number of individuals certified in commercial forest and timber management.
2. Very good. Except: Until the rule making is complete there has to be a moratorium on logging on public forests.
3. Very good. Except: The statement should read "newly initiated plans will not be approved until the interim rule making is complete." It makes no sense to allow unapproved plans to proceed.
4. Excellent. Well done and badly needed.
5. This item is essentially included in Item 1 so is not needed. As written it is vague and poorly worded and uses jargon. Item 5 should be a clearly worded outline for how public forests can sequester carbon plus the addition of broad immediate and long term goals with requirements to publish results annually.
6. Very good. Commendable and needed.
7. Not needed since it is assumed under Item 6. As written Item 7 uses catch phrases that are not defined and are susceptible to misinterpretation.
8. The first sentence again uses jargon and undefined terms, is implied by other items and should be eliminated. The second sentence is imperative.
9. Excellent.
10. Eliminate the term "ecological health." It is meaningless unless carefully defined. Otherwise very good.
11. Redundant and should be eliminated. Included in other items.
12. Good. The use of fire badly needs to be reevaluated.
13. Excellent.
14. Excellent.
15. Eliminate the third sentence. It includes specifics that should be decided within individual plans rather than in a broad framework. In any event there should be no cutting, removal or sale of wood on and from public forests without public input, peer-reviewed scientific justification, and adherence to restrictions in all documents and deeds, Green Acres restrictions, and wetlands restrictions for the specific tract. Again, the term "ecological health" should not be used unless well defined.
16. Excellent.

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joe attamante

I have attended and participated in every "Ecological Health" session of the task force.

I have previously messaged the chairs of my disappointment that the task force only considered and discussed fewer than half of the submitted proposals, some were not deemed acceptable for discussion or submission to the DEP, while several of those that were presented were only given cursory discussion. Moreover, there was never a yea or nay vote on them, nor, particularly egregiously, was there a vote on whether we should recommend a moratorium on logging and wood removal until the legislature and the DEP had time to consider and decide how best to manage our remaining public forests.

The only proposals on which I saw substantial agreement, amounting to consensus, and with which the chairs concurred, were those that addressed the necessity to mitigate the deer problem and the proliferation of invasive plant species.

There was much good that came out of these meetings: the recommendation that a science panel be established and empowered to evaluate all DEP recommendations vis-à-vis forest management, and that certain portions of the remaining forested lands be set aside for their special ecological, cultural value, as well as for carbon sequestration. In addition, a key recommendation was to revitalize and implement the moribund "Natural Areas Program".

The chairs had the daunting task of managing 100+ participants with diverse views and positions, and were charged to recommend changes in legislation and policy to address the need to maintain and enhance our remaining forested lands and to propose specific management means to achieve those ends. Unfortunately, the current framework and recommendations, though including many that are worthy of implementation, nevertheless omit many sound proposals and their principal recommendations, such as those addressing pro-forestation and banning logging in all public forests.

The Framework does not reflect a consensus of the participants as votes were not officially taken.

For the above reasons the framework does not adequately satisfy Senator Smith's charge and goals.

Additionally, the Framework's second sentence that "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities", says that ongoing, problematic plans such as at Sparta Mountain WMA are grandfathered in, OK and may continue business as usual.

I cannot support the current framework.

105x

William Kibler

J.D.

We support a pause on all new management plan approvals beginning immediately. We support a pause on current and new forest management projects until the legislative process has been completed and rules are adopted and implemented consistent with a robust public input process.

106x

Judy Kroll

The Friends of Drew Forest (FODF), an all volunteer 501c 3 corporation cannot support the proposed framework of the NJ Forest Task Force for the following reasons:

- The framework, though thoroughly reviewed and commented upon extensively, fails to protect NJ public forests, including mature native forests, from current and on-going desecration, including logging, clearing of tree canopy, egregious destruction of forest floors from heavy machinery and large vehicles, removal of logs and resulting devastation to wildlife habitat. In fact, the framework contains the following caveat on page one: "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." FODF's volunteers joined the Task Force to try to mitigate these exact practices, and were vocal and consistent about this critical need, so it is unfortunate that the Task Force Co-Leaders instead chose to codify the status quo.
- Old forests provide the most climate carbon capture, and are critical to mitigation of our growing climate crisis. Climate change MUST be foremost in any policy making and implementation. To avoid worsening climate change, our public forest policies must: stop cutting mature native trees, stop clearing the canopy, and stop removing logs, stop clearing old forests to grow young forest. The scientific proof for large trees sequestering the most carbon is unquestionable.
- The framework contains far too many vague and undefined terms, leaving many opportunities for interpretations that will not support the goal NJFTF was given in the first place.

Elliott Ruga

Rec. 1: Without additional language and clarification this recommendation has the potential to cause more harm than good. Specifically, the scientific advisory panel should be independent from the NJDEP and must include a balance of experts from biology, ecology, forestry, and wildlife biology such that no group is overrepresented while maintaining an appropriate span of expertise.

Rec. 7: We agree that at times an intervention is necessary, however, we disagree with the recommendation as stated because active management implies that timber is allowed to be removed from the forest for the purposes mentioned, which we oppose.

Rec. 15: We disagree. This recommendation is egregiously misleading by seeming to prohibit an activity that most agree is wrong in publicly owned forests, commercial timber harvesting. Then, the same activity, timber harvesting, is sanctioned if it is done in service of ecological goals. Today, forest management plans justify timber harvesting to achieve spurious ecological goals, or for legitimate ecological goals that could be accomplished with non-harvest alternatives, i.e., alternatives without the adverse impacts of mechanized harvesting and wood removal. This recommendation upholds the status quo and the continued adverse impacts of timber harvesting in our public forests.

John Landau

Rutgers Environmental Steward, NJ Forestry Association Woodland Steward, Rutgers GI Champion. UN Convention on Biological Diversity 10 week MOOC "Ecological Restoration"

I regret that I cannot support this Framework of Recommendations, which includes good work but in general lacks the firm bones to build sustainable legislation and policy upon. More work is needed to build upon this to get to recommendations.

In my opinion a Public Forests Management Framework should be built upon two pillars (ie needs more specificity re framework recommendations 1 and 2):

1. A planning pillar that requires all public forest lands to be subject to a sound two-level land use governance structure.

A. An ongoing inventory-based Master Plan which requires public land to explicitly and only be managed for balanced public ecosystem service objectives: carbon storage, water management, biodiversity, cultural, recreational and educational services.

i. The Highlands RMP and the Pinelands Comprehensive Master Plan should approve and govern Public Forest MPs in their regions.

ii. A similarly independent group should be accountable for Forest MPs elsewhere in the state.

B. Individual local public forestry management applications from the land manager (NJFW, a County Parks Commission, etc) must conform to the locally appropriate Master Plan. (not unlike development site applications).

i. Each Forestry Management plan must assess its positive and negative impacts on each of ecosystem services objectives in its relevant MP.

ii. Management plan approval should belong to the Highlands Council, The Pinelands Commission, or a neutral NJ governance body for other regions in the state.

2. A policy rules and practices pillar (perhaps a Forestry Management Council similar to the requested Invasive Species Council) that defines top-level rulemaking policy and best practices for public forest management planning and implementations.

a. This council should be "of-but-not-in" NJDEP and include a breadth of qualified private and academic professionals and key conservation stakeholders.

b. This council would develop and continuously improve the policy and best practices for deer management, prescribed burns, invasive species management, active management and other public forest treatments that may be needed to meet the ecosystem services objectives.

c. More responsible and accountable than the "Science Advisory Panel"

Lastly, the one element that I STRONGLY OPPOSE is recommendation 6 "to designate carbon reserves".

This is not impactful and will unnecessarily waste resources.

EVERY NJ public forest is a public carbon reserve.

109x

Susi Tilley

Executive Director, Ridge and Valley Conservancy

The Explanatory Statement for No Vote on the Forestry Task Force Conceptual Framework of Recommendations and the reasons despite agreeing in general with Recommendations 1, 2, 3, 4, 5, 9, 11, 12, 13, 14, and 16 in the Conceptual Framework of Recommendations will be emailed separately to the Task Force because it exceeds the 2500 characters allowed in this Google Form.

110x

Douglas Meckel

There are many things to like about the framework, I see the carbon reserve, reforestation, afforestation and taking Native American concerns into account as areas of great progress. However, the framework does not go far enough in changing the current practices of allowing logging on our public lands. Regulations are needed which put proforestation as the goal for managing public forests. The allowance of the sale of timber as long as profit is not the primary reason behind the harvest is seen as a large loophole. The framework proposes rules be adopted within 3 years, which is reasonable. However, the proposed interim plan is not adequate as it allows for the current policies to continue if interim regulations are not adopted within 1 year. Having interim rules adopted in 1 year is highly unlikely due to the need to formulate those regulations, go through internal review, and then public review. I believe that a moratorium is needed to prevent the approval of plans until such time that formal rules are adopted. The plan includes a loophole which would allow projects such as Sparta mountain to continue as long as the stated goal was ecological restoration. Given that the whole impetus for this Task force was Sparta mountain any plan that would allow another Sparta mountain type Project is seen as a nonstarter. No large trees or mature forests should be cut to create "young forest". Climate mitigation and the ecological benefit of mature forests should be our priority. Additionally, the invasive species response is much improved but just "looking at food plots and baiting" as suggested in the framework is not enough. The fact that we can't agree to stop requiring farm leaseholders to feed deer while simultaneously trying to extirpate them from the landscaper shows we have not gone far enough. As you are aware food availability controls fertility & Population densities.

john saponara

phd in ecology and evolutionary biology from Cornell, 1994

The NJFTF framework will not prevent more Sparta Mountain projects, but more importantly, is not guided by the overarching importance of forests in climate mitigation. "Ecological health, biological diversity, and climate resiliency" are not "equally important" next to carbon sequestration and storage. Storing carbon as forests is by far the single most cost-effective tool we have in the climate struggle. Without effective climate mitigation, all of our climate resiliency measures will be overwhelmed. Moreover, unmitigated climate change will become the biggest threat to forest ecological health and biodiversity. Biodiversity is of course critical, but can be met without cutting trees (eg by controlling deer and managing powerline corridors). The gathering tsunami of climate will eventually cure us all of the illusion that any other objective is "equally important", but after Sandy and Ida, and as we lose our hemlocks, isn't it already evident? As 1.5 Celsius slips out of our grasp and we begin to come to grips with the even more monumental challenges of 2.0 Celsius, the droughts and heat waves and fires will continue to worsen, and forests will become vulnerable to new threats. Will climate change leave us with any forests to argue about? Would we today even recognize those climate-ravaged future forests? If as blue and wealthy and educated a state as New Jersey fails to lead on climate, who will?

Sara Webb

Ph.D. Ecology, M.S. Ecology and Forest Resources

This Task Force was created in response to widespread citizen concern about logging of northern NJ's public forests. This practice steeply depletes climate resilience and sacrifices forest-interior biodiversity, where deer and invasive species prevent recovery.

Unfortunately, the proposed framework fails to address these concerns. No protection from short-sighted logging management is called for despite our public forests' great importance today, both for climate defense and for the species reliant on unfragmented mature forests. Proforestation, protecting mature trees for climate defense, was supported by a vast majority of the task force in an early straw poll.

But logging policy is missing from the Framework and was not voted on, though it is a central issue and focus of many proposals. Science is clear: logging our most mature, carbon-rich forests sacrifices both climate defense and biodiversity. Ignoring these concerns in the Framework perpetuates the status quo of problematic deforestation. The Framework offers loopholes and vague language that permit canopy clearance, when it should center on canopy protection. Task force participants submitted extensive research on this subject.

For climate resilience, large trees and mature forests absorb AND store the most planet-warming carbon, per tree and per acre, far more than young or managed forests. This carbon is stored for centuries, and sequestration rates and storage increase exponentially with age for 87% of tree species.

Biodiversity in northern NJ is also threatened by today's logging approach and wood removal, which deplete habitat and soil organic matter. Forest interior species are far more threatened than those of New Jersey's abundant openings and edges, especially as the climate warms. Any creation of young forest habitat should not carve out century-old forests but use New Jersey's abundant young invaded woods and clearings. We support efforts to control deer and invasive species, and emphasize that both threats are exacerbated by opening the canopy. Canopy clearance and the mechanized transport and harvest of timber also impact soil, hydrology, water, vernal pools, and the future forest of young trees. We hope the Task Force report will strongly support ecological stability and restrict intensive management that impairs biodiversity in this time of a warming climate.

Steve Opresnick

Removal of trees should NOT be allowed science and supporting data should be cited for all decisions, especially when removal trees is recommended. Heavy equipment should be limited or not allows due to the ecological impact.

Leslie J Sauer

Assoc prof. UPenn for 20 years, restoration practitioner 45 years

I do not support these recommendations due to their failure to address a primary goal of this task force- an effective response to climate change and forest management. I believe that Senator Smith wanted to be a leader in addressing climate change. These recommendations amount to maintaining the status quo for at least three of the critical few years we have left to act. State-level climate planning has ignored the most effective climate defense-protecting public forests from logging and wood removal. Most of the proposals protecting public forests were not reviewed. The relationship between logging and climate was avoided. While many of the recommendations are worthwhile such as increasing deer and exotics management, delaying protection until inventories are complete is unacceptable.

It is not clear that there will be any effective climate management with these recommendations. There are no climate goals such as the importance of saving larger trees or how much of our forest should be designated as carbon reserves.

The language for the carbon reserves is fuzzy and manages to include logging without stating so- "to maintain and enhance carbon sequestration and storage as necessary to advance state climate goals while advancing equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities." Where active management is needed the report also refers to the 80x50 report,* which discusses proactive management for carbon defense including thinning and burning but ignoring protecting existing forests from logging. The associated impacts of logging are ignored altogether such as soil damage and carbon loss. The statement that wood removal is OK when a necessary part of an approved plan is another meaningless loophole that Sparta would slip thorough.

This report is a consensus of the chairs, not the participants. It reflects their bias, apparent from the outset. When 84% of the participants supported proforestation in an informal poll it was not good enough for consensus.

Debate was squashed. Time was consumed by DEP presentations, such as the inaccurate statements about how well deer are managed in public forests. Too much time diverted to the consensus ballot with no real revisions ever made. Meetings were cancelled. Proposals were never posted.

Lindsey Kayman

Masters Degree: Double Major -Air Pollution Control and Environmental Health Sciences, Certified Industrial Hygienist

I agree with many of the recommendations. However, these recommendations can amount to secretly expanding the kind of egregious logging being done in Sparta throughout the state. There is a total lack of transparency with respect to logging. Most people don't know that "logging for ecological health" means the clear-cutting and extensive thinning of the biggest trees as has been done in Sparta, NJ. There was never any data presented that this type of logging has any benefit to biodiversity. In fact, it was discussed that the 10 years of logging in Sparta failed in its objective of bringing back the golden winged warbler. There was extensive scientific studies presented that showed the harms of logging. There was never serious consideration that preserving forests can help sequester carbon and promote biodiversity. Pro-logging groups were invited to a DEP tour and discussion of unpublished data that were not made available to the rest of us. Why are we relying on unpublished data to damage our best control measure against climate change? Also, there are problems with transparency: the list of people on the task force was never provided but the number of members doubled in size after the deadline for joining. The framework was relabeled "recommendations" that the chairs "believe enjoy broad agreement among diverse participants." This is false. Two surveys asked for feedback on each framework item but quantitative results were never provided. There was never consensus -to say that there is consensus about logging and wood removal is a lie. Logging and wood removal were the only issues that there was disagreement on and no one changed their point of view.

Lisa Leone

B.A

The proposed framework fails to mention anything regarding a logging policy. Logging of our mature, biodiverse forests negatively impacts biodiversity and climate resilience. The framework fails to address loopholes regarding logging and canopy clearance

Wilma Frey

MLA (Landscape Architecture) Harvard Grad. School of Design, MPA-Mid-Career (Public Administration)
Harvard Kennedy School of Government

Regretfully, I cannot support the Framework Recommendations because they do not clearly and purposefully address Sen. Smith's charge to the Task Force to "study and identify ways in which the State can best manage its forests in order to fight climate change...." Climate change was named first on his list in the directive. This was not, I think, accidental, strongly suggesting that addressing climate change should be the top priority. It is not, however, treated as top priority in the Framework. It appears to me that, in order to meet its stated carbon sequestration climate defense goals, New Jersey needs to manage ALL of its mature and maturing public forest lands using the "proforestation" management model, which entails no cutting of mature trees, and, for ecological and carbon storage reasons, no removal of logs or other vegetative forest material from the forest site. To meet NJ climate defense goals, management of New Jersey's mature public forests should be proforestation. I would urge that Recommendation #6 be extended to be the default designation for the vast majority of the state's mature public forests.

I support Recommendation #5: There is a need for afforestation - planting new forests on lands that may have been agricultural in the past. There is also a need for reforestation, of lands that were formerly forested. Both of these categories will need planning and design and planting and care and maintenance to shepherd them into maturity - much more maintenance than existing mature forests managed with proforestation principles.

I question Recommendation #12, as I am not convinced that the use of fire should be greatly increased. I am strongly opposed to Recommendation #15, whose second sentence would continue to authorize and permit the kind of management/logging activities that have created devastation at sites in the Sparta Mountain WMA. The logging projects there have all been described as fostering wildlife habitat goals. They should never have taken place. Recommendation #15 is a continuation of the status quo, and is a deal-breaker with regard to the Task Force recommendations.

Thank you for your consideration of my comments.

Wilma Frey

Larry Baum

minor in mathematics; BSc. in conservation biology, biology and physics; Ph.D. in Theoretical Physics (& worked with forest conservation since the early 90s; read and studied lots on mature and old-growth forest issues; talked with leading eastern old-gro

Need more space(2500chars(not even words!))absurd limit2seriouslydiscuss anything¬ even enough4full rant)&time(holiday season).It's especially galling considering many proposals were never presented&most meetings were half propaganda speeches from DEP (were not even supposed to have part in).All framework does is provide more green washing cover4current abuses&does not1thing to protect our forests, not even mature1s,not even ancient 1s,as they will now try to claim broad conservation group support (1 hopes NJ Sierra Club under new leadership remains last true group&refuses to sign off on this).See nothing but gifts for NJAudubon/DEP&Forestry industry here but not even the most basic proposals from NJCons.or Sierra in framework!It will allow4total violation of public trust/Green Acres charter&violations of intent&law of the Highlands Protection Act.It provides more ways4 profiteers to get more tax\$to abuse our forests4personal profit while letting them now claim that things like proforestation are controversial,never mind came closer to consensus than active management (almost universally so, were those with\$conflicts of interest discounted;press kept out in the claim of 'full transparency' too (????)).A few minor good elements about fire in Pinelands(but also worse than questionable implications for it's use elsewhere in the state).A few good bits on invasive species.Otherwise, it's toothless or worse.It ask4 more tax \$ for plan writing&destructive make work to line the pockets of 0.00001%of the state&subsidize a long gone industry in the state.Says no commercial logging but allows4selling timber!Naive joke to think that allowing sales from 'conservation oriented' projects means anything less than anything goes.We already see it at work in NJ.Say only if follows science but this taskforce didn't even follow what little science was allowed to be presented!USFS/USDA plan2log1of greatest remaining ancient forests in WVa. as part of a 'conservation' goal for (yet) more young forest (when ancient forests is the rarest of all and mature forest the next most rare). Look at the history of forest conservation&such things are proven beyond meaningless.Anything can be called for some conservation goal.Say you have a goal for a clearing,then anything goes, log over a vernal stream,log a 100, a 200, a 400 year old forest,a steep slope, whatever, it fulfills a goal of a clearing.See what happened under cover of local Audubon groups in MA, PA, WI, MI already.

Sharon Wander

B.S. (Wildlife Management) Cook College; Ph.D. (Ecology) Rutgers University

I agree with many of the Framework recommendations, including instituting rulemaking, conducting inventories to inform a planning process, creating a scientific advisory board, improving control of deer and invasive species, protecting the values of Indigenous peoples, and adequately funding the entire endeavor. Nevertheless, in my opinion the Framework does not adequately protect NJ's public forests. It does not recognize their critical importance (through carbon sequestration and storage) in defending our densely populated state against the ongoing damage of climate change. These (free!) services demand the utmost protection"by prohibiting cutting of large trees and removal of wood"but the Framework fails include such a recommendation. The discussion of scientific proforestation concepts, and of proposals based on them, was largely denied to Task Force participants. The Framework makes no mention of proforestation, but rather includes vague language such as managing to "address threats to ecological health" or to "maintain biodiversity," or the use of "multiple management approaches." All such terms are simply ways of leaving the door open to continuation of traditional timber harvesting such as is currently ravaging Sparta Mountain WMA, where the century-old habitat of Endangered and Threatened forest birds is being sacrificed (in the name of biodiversity) to "create habitat" for young-forest birds"when other WMAs include thousands of acres of open fields better suited to accommodating these species. Since the Framework as written will not protect New Jersey's public forests from industries, agencies, organizations, and individuals who seek to profit from them or misuse them, I cannot support it.

120x

Christine Hepburn

Ph.D. in Psychology (relevant for evaluating scientific papers)

Despite agreeing with many of the Framework's Recommendations, RVC dissents from the Framework overall because:

The Framework does not express an overarching rationale or vision for the codification of the management of New Jersey's public forests. RVC believes that the primary rationale should be climate defense. In view of the existential crisis posed by climate change, and the indispensable role that trees play in carbon storage, all forest management activities should support this role. No activities should decrease a forest's contribution to climate mitigation, except for invasive species control. But the Framework nowhere recommends a prohibition on cutting of large trees and on removal of wood. Recommendation 10 for managing forests "as necessary to advance state climate goals" is weakened by the loophole of managing for other "equally important goals," when fully protecting forests for their climate-defense capabilities would automatically advance these other goals. The extensive tree cutting on Sparta Mountain WMA—purportedly done to enhance biodiversity—is an example of how this loophole can be exploited. Implementing policies based on climate defense would require DEP to rethink its approach to forest management, rejecting timber-production forestry methods in favor of proforestation, which allows for a variety of activities that do not involve significant tree-cutting or removal of wood. DEP is likely to resist such a paradigm shift and unlikely to effectively implement a statute that is not clearly based on a vision that demands change.

The Framework is not science-based. All efforts at introducing scientific proforestation concepts and language to the Framework were rejected. Many proposals for science-based management were never allowed to be discussed. The Framework's vague language (e.g., management for "future threats to ecological health") sounds good but would allow continuation of the current practice of logging mature forest timber under the guise, for example, of habitat creation for early successional bird species. The Framework does not suspend already approved/ongoing logging activities on public forests prior to completion of rulemaking. The proposed rulemaking processes are welcome, as virtually no rules exist governing forestry on public lands. But given the 3-year window allowed for DEP rulemaking, this delay could allow for extensive areas of further logging in public forests, such as on Sparta Mountain WMA.

Joe Kazimierczyk

Sourland Conservancy has concerns about recommendations regarding the time-frame for implementation. As currently written, the framework would allow new plans using existing questionable practices to proceed, if interim rules are not propagated within one year.

Another concern is that allowing the sale of wood products could become a loophole for commercial logging, and we hope that subsequent rules and legislation will prevent this.

Finally, we hope that the use of "ecological restoration" would not be used as a reason to fragment existing older growth forests.

Overall the Framework is an improvement over the exiting state of affairs, but we don't think it goes far enough.

Miriam Dunne

B.S. Natural Resource Management (Cook College, Rutgers University, M.S. Biology (E. Stroudsburg University

Our forests need management, and we cannot wait until a formal rulemaking process is developed for existing plans to be implemented. Several wildlife species of special conservation concern are on the brink of requiring listing as threatened or endangered. Further delays in active forest management to address the needs of these species will result in continued declines in their populations. The state has expended considerable resources to develop plans for forests and Wildlife Management Areas. These plans have been vetted internally and externally and represent sound science. All existing plans should be able to be implemented with no "interim rule making process" to delay their implementation. Likewise DEP should not be prevented from finishing any plans that are in process while an interim process is developed. This delay tactic only serves the anti-management factions who don't believe that forest management can be beneficial for wildlife. There is, indeed, so little actual management taking place at present on state land that discussion of a moratorium on management is laughable. DEP needs to be encouraged to continue management as it has been doing with a robust internal vetting process, and an outreach effort that informs the public as is appropriate and seeks public input. Getting public consensus on stewardship plans will be impossible and it will have to be acknowledged that if biodiversity and forest health is a goal then some trees will have to be cut. It is hoped that the experts at DEP and other advisory professionals will prevail and enable the state to do the management necessary to protect biodiversity and ultimately benefit climate.

We do not support expanding the existing Natural Areas Program. Some NA represent unique habitats but many are designated arbitrarily and are no more unique than their surrounding landscape. Having more robust mapping for unique plant communities, and increasing communication within DEP between the NA manager and the program managers in P&F and DFW would be more beneficial to encouraging sound protection and management of these areas. Likewise we do not support the addition of an oversight council for old growth/carbon reserves. Since 99% of public land is not managed at present, there is a huge advantage to future old growth development. The planning process will identify older stands that can represent future old growth, and indeed define what is meant by old growth.

Larry Herrigty

B.S. Wildlife Managment

The New Jersey Outdoor Alliance (NJOA) does not support the following recommendations:

Recommendation (R) 1. NJOA does not believe that DEP needs to be "directed" to initiate statewide planning and mapping of forest lands. DEP is already conducting these activities but is restrained by a lack of funding.

R 2. NJOA is satisfied with the 14-step process currently used by DEP to create Forest Management Plans.

R 3. NJOA does not believe rule-making is necessary for the DEP process of creating forest management plans and recognizes a thorough public process exists within the existing process.

R 7. NJOA does not believe DEP needs to be "directed" to identify where to practice active forest management since such management is already practiced to meet stated objectives.

R 11. NJOA believes the current DEP process is adequate and rulemaking is not necessary.

R 13. NJOA does not believe DEP needs to be "directed" to amplify efforts to combat invasive species. DEP's efforts are constrained by funding which should be increased to fully implement their effort.

R 14. NJOA does not believe the Science Advisory Panel is needed to guide DEP deer management as a public process through the Fish and Game Council rulemaking is adequate. Predators such as bobcats, bears and coyotes prey on deer. However, increasing bear and coyote populations such in order to manage deer in an undefined "deep forest" puts public safety at risk and is not necessary. The Fish and Game Council has already adopted regulations to allow fertility control of isolated deer populations. Fertility control has been proven to be ineffective on deer populations over the general landscape. NJOA opposes the development of a pilot program for commercial use of deer because it is not needed, it is inconsistent with the North American Model of Wildlife Conservation, is not cost-effective and no infrastructure for processing deer commercially exists in NJ or if created, likely not to be profitable. It is an inappropriate use of a public resource on public land. Recreational deer hunting is the most cost-effective means of controlling deer and when conducted on public land and unimpeded, has resulted in the ability to regenerate forests. The Fish and Game Council has the authority to adjust deer season length and bag limit if necessary to promote forest health.

R 15. DEP has not made commercial use of forest products as a primary goal in any forest management plan, therefore R 15 is not needed.

124x

Margaret Wood

- Master's Degree in Aerospace Engineering, Polytechnic University (merged with NYU)
- Bachelor's Degree in Aerospace Engineering, Polytechnic Institute of Technology (merged with NYU)
- Completed an additional 2+ years of graduate courses beyond the MS d

NJFTF Conceptual Framework: "The 'Co-Chairs' reached agreement on these recommendations.... and 'believe' that the framework includes ideas that enjoy 'broad' agreement among diverse Task Force participants." (emphasis mine)

Upon registering with the NJFTF, a screen appeared defining the 'Charge to the Workgroup'. It said, "Provide a set of recommendations to the Senate Environment and Energy Chair Senator Bob Smith and members of the Senate Environment and Energy committee that include (1) consent and (2) nonconsent items (which can include majority and minority reports) by Dec 31, 2022 regarding management of forested public lands."

I signed up under the premise that I and my fellow participants were to provide recommendations to the SE&E, not the Co-Chairs.

We worked hard! We used the proposal system described on 6/6/22. We researched facts, used scientific papers, and wrote proposals to achieve solutions. The proposals with the most votes were supposed to be submitted to Senator Smith as recommendations.

Only a few proposals were heard, 'hand-selected' by the Co-Chairs. The 'Co-Chairs' dropped the others and created their own 'Framework' to be reviewed by Senator Smith. Our proposals were shunted to the Appendix in the back, which no one ever reads.

The Co-Chairs claim they 'believe' their Framework reflects the work of the participants. 'Belief' is NOT 'fact'! Factual evidence of proposal consensus requires a vote. The Co-Chairs never allowed a vote. We were only allowed to vote on the Framework authored by the Co-Chairs. The Framework never got consensus. We had a large voting block who consistently voted against it.

The Co-Chairs claim the framework represents "broad" agreement of the participants. "Broad" is subjective, NOT factual. Is broad 95%? 51%? We were not allowed to see the final vote tally. Perhaps "broad" is just the 4 votes of the Co-Chairs.

The number of participants drops each month as they become fed-up with the co-opting of the process by the Co-Chairs.

This process was changed/'fixed', to keep the status quo. The Framework does NOT reflect our proposals. We were adamant about removing loop-holes. The Co-Chairs added more loop-holes with each draft. Our efforts and time were wasted. We were cheated. The Co-Chairs stole our opportunity to be heard, appropriated it, turned it into an opportunity to achieve their own agendas of maintaining the status quo.

Global warming climatologists are needed on your panels of experts.

Mark Lohbauer

BA, Rider University; JD, Rutgers University

While I do agree with some of the provisions of the framework regarding invasive species and control of the deer population, I disagree with the central premise of the framework regarding forestry on public lands. We are now in an era of climate crisis and healthy forests represent our best defense in mitigation of that crisis. The framework allows for logging on public lands: specifically, it allows for the cutting and the removal of wood material from forests on public lands. It purports to do so in the name of healthy forest management, promotion of biodiversity, and even for wildfire suppression—but none of those goals are consistent with the primary goal of carbon sequestration; further, none of those goals were proven to be supported by scientific data in our debates at NJFTF sessions. Rather, our forestry policy for public lands should be proforestation which allows for limited cutting (for example, to fell dead or diseased trees for pest or disease control) and no removal of wood material from the forest. This issue was central to our mission at the NJFTF, and not only does the framework fail to recognize it, our entire meeting and discussion process over the past year failed to give fair consideration to the proforestation concept. From the outset, a process that defined “consensus” as not a simple majority, but rather as near 100% of the group was doomed to fail in its effort to reach consensus. As a result, controversial discussions were blocked and avoided rather than heard. The public lands belong to all of the people of New Jersey, both for today as well as future generations. Our forestry policy should embrace the goal of preservation without qualification. That policy should be nothing less than proforestation, which the framework has not allowed. This is a fundamental failure of our charge from Senator Smith, so I register this dissent to the framework.

Doris Lin

B.S. in Applied Biological Sciences, Massachusetts Institute of Technology

J.D., University of Southern California Law School

The League of Humane Voters of New Jersey (LOHVNJ) objects to the NJ Forestry Task Force framework and to the process by which it was adopted.

The framework is vague and leaves too much discretion to a "scientific advisory panel." Science is not policy.

The reliance on public comments in the rulemaking process is misplaced. NJDEP has a history of adopting rules despite overwhelming public opposition.

Recommendation 15 creates an incentive to cut trees and remove wood. There is no ecological reason to remove wood, so allowing the sale should not be recommended at all.

Increasing funding to NJDEP is premature when the policies have not been developed yet. Some recommendations are vague and others (i.e. ending deer feeding plots) require no funding.

We object to prescribed burns, which create the edge habitat that is preferred by deer.

Furthermore, regarding deer, NJDEP has been managing state wildlife management areas for decades to increase the deer herd and grow trophy bucks through prescribed burns and clearcutting (to create edge habitat), food plots for deer and farm leases that require farmers to leave crops standing for deer.

NJDEP partners with hunting clubs to plant food plots for deer, and then gives awards to hunters who kill bucks with the biggest racks. The sale/donation of venison has nothing to do with reducing the deer herd when NJDEP keeps the deer herd artificially abundant for hunters.

We object to the statement that the recommendations are not intended to interfere with current forest management plans. The state should reassess their plans and there is no reason to wait.

LOHVNJ objects to the process of the task force. Task force members (TFMs) could submit proposals, but were not allowed to communicate with each other and were not allowed to author any part of the framework.

The entire framework was written by the co-chairs. TFMs were prohibited from emailing all other members, and chat among members was disabled during the Zoom calls. When a TFM was allowed to present their proposal, there was no vote on the proposal. The co-chairs decided how, if at all, a proposal would be included.

Also, the voting process is opaque and unjust, because some groups were given more votes than others based on an unfair assessment of whether a group's members count as "members."

Lastly, we were given unrealistically short deadlines and character limits, over holiday weekends, for submitting proposals and comments. (abbreviated to 2500 characters)

127x

Angi Metler

We oppose the framework in both the process of its adoption & conclusion. It is the status quo, vague, and relies on a "scientific advisory panel." Confirmation bias will play a role in adopting any forest policy using this criterion. Using the DEP rule-making process to dissent is wrong because the DEP adopts rules even when opposition is high. #15 allows for the sale of wood. This incentivizes cutting trees & removing wood. There is no ecological need for this, so remove the sale of wood. Increasing funding to the DEP is premature when the policies are in progress. The statement "all recommendations discussed above require funding" is untrue when some recommendations are vague, and some (i.e., cessation of deer feeding plots on state lands) requires no funding. We oppose prescribed burns for climate & health. It also creates deer habitat, thus growing the deer herd. We reject blaming deer for forest issues because the destruction is caused by other factors—developers and loggers fragment forests for commercial & residential expansion. Hunters in sync with the DEP use clearcutting to create edge habitats for deer. DEP also uses clearcutting & food plots to grow the deer herd. DEP works with private hunting clubs to plant deer-preferred crops and rewards them when they kill the biggest deer with the largest antlers in its annual deer classic. APLNJ objects to "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." The state should be reassessing its forest plans, so why wait for those plans to expire before adopting new plans that fight climate change, sequester carbon, protect trees, and preserve wildlife habitat?

The co-chairs wrote the framework. Communication was discouraged between members. The co-chairs decided which proposals would be included in the framework or discussed at meetings. The chat was disabled during Zoom calls, so the co-chairs controlled the discussion.

- Since members did not communicate, this framework does not represent the views of the NJFTF members.
- NJFTF deadlines for proposals & commenting on the final framework were limiting. Finalizing the framework during the December holidays was problematic.
- The voting process was opaque and unjust. While the votes of groups would count more than individuals is fair, some organizations were given more votes than others based on an unfair assessment of whether an organization's members count as "members."

Silvia Solaun

MS

NJ Forest Watch CANNOT Support the Framework. NJ public forests need to be held to HIGHER Standards. The "Final" framework is biased and not representative of the public stakeholders and has misleading language of which allows the "status quo" to prevail. -Does not describe a plan to use forests to mitigate climate change by protecting and setting aside ALL of the 1M acres of public forests for climate change. -Excludes the concept of Proforestation and it was ridiculous how actual peer-reviewed science has been ignored. -Excludes the use of a moratorium and allows the foresters and NJ Audubon to continue to write plans on public lands with no rules or regulations. -Excludes the use of peer-reviewed science, in particular on carbon sequestration being a function of leaf area (with trees increasing or holding steady on sequestration for hundreds of years), newly logged areas being net emitters of carbon for decades, the ecological importance of leaving cut wood on the ground and lack of need to remove wood for any ecological purpose. -The timeframe for new regulations is too long. We want forest protections NOW. Public forests, like on Sparta Mtn are being destroyed now. Purposely put within the framework are buzz words like "ecological health" and these are too vague and allow the status quo to continue. Instead, NJ should enact a "Forever Wild" component to ALL of the 1 M acres of public lands as the climate crisis is real and cutting more forests down, is exacerbating the issue. Now on with the issues with the NJFTF process as stated in our previous comments but worthy of repetition: More than half of the taskforce chairs & their organizations benefit from the writing, implementation and "stewardship" of public lands. This demonstrates that the taskforce is represented by biased, and financially motivated groups. These financial motives of these groups are for "self preservation" & are not in the best interest of the public! The Taskforce did not use promised consensus process, but instead only used surveys. There was never a reveal of last 2 rounds of surveys on the framework. Instead, all participants should have full disclosure of who participated in the surveys, and NO outside agencies should have been allowed to participate. There was never a debate process. There was no peer reviewed Science presented, instead it was all SPIN manufactured by the groups who benefit from the writing and implementation of logging plans throughout the state.

Hilary Persky

I complement the framers on this attempt. My concerns are to do with a framework that maintains a DEP status quo that contributes to ecologically unsound logging in a time of climate crisis.

Jeanne Fox
Former BPU President

I thank the four Task Force leaders for your time, effort and commitment to this important topic. I also am grateful to the many forest experts and concerned citizens for their dedication to this effort. I believe that the Chairs did gather a general consensus on most topics, such as the critical topics of invasive species; deer management; the necessity for establishing a good process for public comment/input; and a true rule-making with a one year deadline. The establishment of a diverse expert panel is a good step forward. I appreciate other changes made by the Chairs such as adding in Recommendation #6 "a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel) for their carbon benefit." Old trees retain large amounts of carbon which is a necessity at this time. I also agree with most of the other Recommendations though I did wish for clarifications regarding some of them but I certainly do not have enough knowledge to object in any way.

At least in the near term (probably 20 years), mitigating the Climate Crisis must be THE priority goal in forest management. In fact, I believe that Recommendation 7 is misleading when stating "active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health." Recommendation 7 cites consistency with the NJ Global Response Act 80X50 Report's "carbon sequestration goals" "which discusses proactive management for carbon defense including thinning and burning." pp 153-160. So, I went to that section which speaks clearly to carbon sequestration's 5 pathways: #1)reforestation, #2)avoided conversion of natural lands, #3)salt marsh and seagrass restoration and enhancement, #4)conservation management of agricultural lands, and 5)proactive forest management. Only Pathway #5 - pro-active forest management discusses "active forest management through thinning and selective burning." The intent is to lessen the risks of severe wildfires and pest infestations. However, that pathway concludes that "additional analysis is needed, however, to fully understand the carbon gain potential (or avoided emissions) from carbon defense strategies such as active forest management through thinning and selective burning." Thus, I urge that, until that critical analysis is done, crown separation and tree thinning not be permitted in old growth forests.

Appendix D. Forms, Surveys, Documents

Appendix D-1: Rules of Engagement

Appendix D-2: Cutting and wood removal survey

Appendix D-3: Framework surveys

Appendix D-3a: First Draft Framework Survey – 124 Respondents

Appendix D-3b: Revised Framework Survey – 102 Respondents

Appendix D-3c: Third Revised Framework Survey – 63 Respondents

Appendix D-3d: Final Framework Survey – 113 Respondents

Appendix D-4: Original topic prioritization survey

Appendix D-5: Collaboration Table

Appendix D-6: Flyer for panel discussion, “Exploring Conservation and Proforestation options for NJ Forests”

Appendix D-1: Rules of Engagement



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NJ Forest Task Force

Rules of Engagement

Guidance to Task Force co-Chairs

- Act as primary points of contact for the Task Force.
- Manage workgroups in accordance with the shared values and make everyone feel welcome and exhibit healthy conflict resolution
- Collaborate and communicate with fellow co-chair(s) in a true partnership, including developing agendas and workflow for the Task Force.
- Facilitate discussion of topics to ensure accuracy of information and general consensus around recommendations presented.
- Provide guidance to workgroup co-chairs and participants.
- If a participating organization or individual is maligned, another co-chair should weigh in.

Guidance to Task Force Workgroup Co-Chairs

- Act as primary points of contact for workgroup to the Task Force.
- Manage workgroups in accordance with the shared values and make everyone feel welcome and exhibit healthy conflict resolution
- Assign tasks to workgroup members and monitor. Be aware of deadlines for materials and communicate that to workgroup members.
- Facilitate workgroup review materials to ensure accuracy of information and general consensus around recommendations presented.
- Participate in meetings and stay up to date on issues, representing all viewpoints and considerations discussed in workgroup.
- Provide guidance to workgroup participants. Ensure clear roles and responsibilities.
- Identify conflicts and work through them

Guidance to Participants

- Behave in a professional and respectful manner.
- Actively create space for the voices of all.
- Focus on the issues.
- Be open to other perspectives, opinions, and ideas.

- Arrive prepared and on time for all meetings.
- Review materials for accuracy and credibility.

Email etiquette

- Do not misrepresent your email as coming from the NJ Forest Task Force. Only email from "NJForestTaskForce@gmail.com" represent communications from the co-chairs.
- Do not send mass emails to the entire workgroup.
- Refrain from sending "reply all" responses to task-force-wide emails. Limit any replies to emails to those who need to know or to whom you are collaborating
- Do not forward workgroup emails to contacts outside the workgroup.
- Do not send attachments or information via email unless requested. Material submitted in support of a proposal should be submitted with the proposal. Any material submitted outside that process will not be reviewed or considered.

Zoom Guidelines

- Please do not share zoom links with external parties. These are unique to workgroup members for participation in working meetings.
- We expect your full attention and participations on all meetings. Please avoid external conversations or distractions.

Removal of Participants

Wanton or repeated violation of these expectations is grounds for remove from the working group

- Removal will be determined by the task force co-chairs.

Appendix D-2: Cutting and wood removal survey

NJFTF Survey - timber harvest/commercial logging

As it relates to the stewardship and care of our state forests, please indicate your agreement/disagreement with the following statements by choosing agree or disagree. For the purpose of this exercise cutting will mean just that (cutting trees to the ground) and removal will mean just that (removing the trees from the woods).

* Required

1. Email *

2. Your Name *

3. Who you represent *

Mark only one oval.

- ☐ Self
- ☐ Organization
- ☐ Government entity

4. If you represent an organization or government entity, please name. *

5. Please select the ONE answer that best describes your position about cutting trees. *

Mark only one oval.

- ☐ Cutting trees should never be permitted
- ☐ Cutting trees is an activity and/or tool that can only be used as part of an approved plan so long as the objective pertains to the overall ecological health (current & future) of that particular forest.
- ☐ Cutting trees is an activity and/or tool that can be used as part of an approved plan for a variety of objectives, including the generation of revenue for the NJDEP.
- ☐ Abstain

6. Please select the ONE answer that best describes your position about wood products. *

Mark only one oval.

- ☐ The removal of wood products should never be permitted.
- ☐ The removal of wood products is an activity and/or tool that can only be used as part of an approved plan so long as the objective pertains to the overall ecological health (current & future) of that particular forest (and therefore, the removal of the product is required to meet said ecological goal)
- ☐ The removal of wood products is an activity and/or tool that can be used as part of an approved plan for a variety of objectives, including the generation of revenue for the NJDEP.
- ☐ Abstain

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NJFTF Conceptual Framework for Public Forests in NJ

Please indicate your level of support for the bullets listed as well as the two broad sections, and overall conceptual framework. Where appropriate, note your comments for the individual bullets. Comment only on bullets where you are suggesting revisions or additions.

NOTE: The goal is consensus.

Please complete by

Monday, October 10th.

Introduction from Senator Smith

"Forests are critical to the environmental welfare of our State. They can play a major role in mitigating climate change by sequestering carbon dioxide; providing habitats for endangered wildlife; helping clean and protect drinking water sources; and stabilizing soils. Proper management of forests is also necessary for preventing wildfires which are becoming more frequent and intense. For decades, we have been debating what proper management of the State's forests should look like, and what the State's policies for forest stewardship should be. We've assembled this task force in order to

identify and debate the major issues and ultimately develop consensus solutions which could form the basis for future legislation."

**Mission
of the Task Force**

The purpose of the task force will be to study and identify ways in which the State, counties, municipalities and other entities responsible for land acquired through public sources can best manage its forests in order to fight climate change, prevent forest fires, improve ecosystems, and protect soil and water quality, among other things. The task force will take feedback from interested parties and then compile a report on consensus and non-consensus issues with respect to forest stewardship for submission to the Committee.

* Required

1. Your Name *

2. Please indicate if you are the authorized representative of an organization and the name of that organization. *

3. Level of support for overall framework. *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Not likely to support without significant revisions
- ☐ Disagree/not support

4. Comment on overall framework

5. Level of support for Statewide Planning and Inventory section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

6. Comment on Statewide Planning and Inventory section

7. Level of support for Forest Management and Implementation section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

8. Comment on Forest Management Planning and Implementation section

9. **1. Statewide Planning and Inventory:** Protection and management of NJ's public forests must be based upon a comprehensive planning and mapping process at the landscape level based upon sound science and data including appropriate inventories of all biota. This planning process should include a scientific advisory panel, as well as require robust public participation throughout the process.
-

10. **2. Statewide Planning and Inventory:** A formal rulemaking process, in accordance with Administrative Procedures Act, is needed to guide the development of forest management plans on public lands including consistency with statewide planning and inventory efforts.
-

11. **3. Statewide Planning and Inventory:** The planning process must identify additional areas that should be designated as natural areas. Toward this end, the Natural Areas Program at NJDEP should be updated and expanded.
-

12. **4. Statewide Planning and Inventory:** The planning process must create a new designation to be identified as ecological reserves (i.e., set-asides with management as necessary to address ecological threats and as determined by an oversight council) whose primary function is to promote maturing forests where possible and to provide for future old growth forests.
-

13. **5. Statewide Planning and Inventory:** The planning process must also identify areas where more active management is needed to address current and future threats to ecological health or to address goals as identified in the planning process.
-

14. **6. Statewide Planning and Inventory:** The planning process must recognize the importance of adaptive management, whereby management approaches are adjusted over time based upon new data and changing circumstances in our forests.
-

15. **7. Statewide Planning and Inventory:** The planning process must consider the significant variation in our forests, such as the uniqueness of the Pinelands.
-

16. **8. Forest Management Planning and Implementation:** NJ's public forestlands must be protected and managed to maintain and enhance carbon sequestration and storage as necessary to meet state climate goals while meeting equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities. Planning and inventories should guide the prioritization of management goals in different areas.
-

17. **9. Forest Management Planning and Implementation:** All forest management plans must be reviewed in accordance with the process established through rulemaking noted in the previous section and guided by statewide planning and inventory.
-

18. **10. Forest Management Planning and Implementation:** Meeting these goals requires multiple tools and approaches all of which should be guided by sound science consistent with and guided by the inventory and planning process.
-

19. **11. Forest Management Planning and Implementation:** Prescribed burns are a necessary management tool to reduce the catastrophic fire risk in ecosystems like the Pine Barrens and to meet other critical ecological objectives throughout the state.
-

20. **12. Forest Management Planning and Implementation:** A more intensive effort is needed to address the impacts of invasive species. The NJ Invasive Species Council, created in 2004 but currently dormant, should re-convene and be charged with developing a state-wide strategic plan to address the issue.
-

21. **13. Forest Management Planning and Implementation:** Steps are needed to reduce deer densities in our public forestlands to ecologically sustainable levels to enable our forests to regenerate.
-

22. **14. Forest Management Planning and Implementation:** Increased funding and staff to NJDEP is necessary to carry out these activities and address these goals.
-

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Revised Framework

Changes from the original framework narrative appear underlined in the following sections.

* Required

1. Name *

2. Please indicate if you are the authorized representative of an organization and the name of that organization. *

3. Level of support for overall framework. *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Not likely to support without significant revisions
- ☐ Disagree/not support

4. Comment on overall framework

5. Level of support for Statewide Planning and Inventory section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

6. Comment on Statewide Planning and Inventory section

7. Level of support for Forest Management and Implementation section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

8. Comment on Forest Management Planning and Implementation section

9. **1. Statewide Planning and Inventory:** Protection and management of NJ's public * forests must be based upon a comprehensive planning and mapping process at the landscape level based upon sound science and data including appropriate inventories of specific biota, as determined by the scientific advisory panel.* This planning process should include a scientific advisory panel as well as require robust public participation throughout the process. Initial inventory and planning process should focus on state owned lands and then extend to county, municipal and other lands acquired using state funding.

** Science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists)*

Check all that apply.

- ☐ Agree/Support
☐ Disagree

10. 1. What would bring you to "agree/support?"

11. **2. Statewide Planning and Inventory:** A formal rulemaking process for the development of Forest Stewardship Plans, Ecological Restoration Plans and other plans on public forested lands will be conducted in parallel with the inventory and planning process and in accordance with Administrative Procedures Act. The rulemaking will be informed by and consistent with statewide planning and inventory efforts. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

12. 2. What would bring you to "agree/support?"

13. **3. Statewide Planning and Inventory:** A separate rulemaking process based on * and starting with the internal NJDEP 14 step stakeholder process, developed in 2014, will be initiated and completed within one year. No newly initiated plans will be approved during this one year timeframe (except for necessary fire management activities or emergency scenarios like natural disasters). New modifications to approved plans shall be subject to the current NJDEP 14 step process while the rulemaking is being completed.

Check all that apply.

☐ Agree/Support

☐ Disagree

14. **3. What would bring you to "agree/support?"**

15. **4. Statewide Planning and Inventory:** The planning process should identify areas to be set aside through designations including ecological reserves and/or protected natural areas (as defined by the Natural Areas Program in NJ) which will act as set-asides with management as necessary to address ecological threats and as determined by an oversight council.* A primary goal for these areas is to promote growth of maturing forests and to provide for future old growth forests for their carbon and ecological benefits. In planning for set-asides, the national initiative to protect 30% of the land base by 2030** should be considered in evaluating what percentage of public lands should be designated. *

This may be accomplished through an overhaul and expansion of the current Natural Areas Program. Or, a new program and entity could be established for this purpose.

** Oversight council should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists)*

*** America the Beautiful Initiative*

Check all that apply.

- ☐ Agree/Support
☐ Disagree

16. **4. What would bring you to "agree/support?"**

17. **5. Statewide Planning and Inventory:** The planning process must identify areas * where active management is needed to address current and future threats to ecological health, such as invasive species proliferation, or to address goals as identified in the planning process.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

18. 5. What would bring you to "agree/support?"

19. **6. Statewide Planning and Inventory:** The planning process must recognize the * importance of adaptive management, whereby planning, inventory, and management approaches are adjusted over time based upon new data and changing circumstances in our forests. The statewide planning and inventory should be updated at least every 10 years after completion of the first Statewide inventory.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

20. 6. What would bring you to "agree/support?"

21. **7. Statewide Planning and Inventory:** One guiding principle of the planning process must be to consider the significant variation in our forests, both on a macro (landscape) level and micro level. For example, the uniqueness of the entire Pinelands ecosystem compared to other regions of the state should be acknowledged as well as the variations that occur at a much finer spatial scale within a forest.

*

Check all that apply.

☐ Agree/Support

☐ Disagree

22. **7. What would bring you to "agree/support?"**

23. **8. Forest Management Planning and Implementation:** NJ's public forestlands must be protected and managed to maintain and enhance carbon sequestration and storage as necessary to meet state climate goals* while meeting equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities.** Planning and inventories should guide the prioritization of management goals in specific areas, recognizing that these goals will be achieved across the aggregate of acres owned by the state rather than on one single acre in any specific area. Areas having historical, cultural and spiritual significance for Indigenous People should be characterized and protected. *

** State climate goals - NJ's Global Warming Response Act 80x50 Report*

*** low intensity recreation as defined as means non-motorized outdoor, nature-based recreational activities, including, but not limited to, boating, swimming, fishing, hiking, hunting, trapping, picnicking, nature observation, photography, horseback riding, tent and shelter camping, cross-country skiing, bicycling, snowshoeing, rock climbing, ice climbing, and enjoyment of open space.*

Check all that apply.

- ☐ Agree/Support
☐ Disagree

24. **8. What would bring you to "agree/support?"**

25. **9. Forest Management Planning and Implementation:** All forest management plans on public land must be developed in accordance with the process established through rulemaking noted in the previous section (bullets #2 and #3) and continuously guided by the statewide planning and inventory as it is developed. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

26. 9. What would bring you to "agree/support?"

27. **10. Forest Management Planning and Implementation:** Meeting these goals requires multiple tools and approaches be guided by sound science as well as being consistent with and guided by the inventory and planning process. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

28. 10. What would bring you to "agree/support?"

29. **11. Forest Management Planning and Implementation:** Prescribed burns are a necessary management tool to reduce the catastrophic fire risk in ecosystems like the Pine Barrens. Additionally, prescribed burns should be deployed in order to meet other critical ecological objectives throughout the state. The current rules related to burn plans and the use of fire should be revisited and revised in order to make this management tool one that can be more successfully utilized by the NJ Forest Fire Service and other trained experts.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

30. 11. What would bring you to "agree/support?"

31. **12. Forest Management Planning and Implementation:** A more intensive effort * is needed to address the impacts of invasive non-native species. Efforts to address invasives must address insects, animals, plants, pathogens, and microorganisms. One approach is to re-convene The NJ Invasive Species Council, created in 2004 but currently dormant, and charge them with updating and implementing the state-wide strategic plan to address the issue.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

32. 12. What would bring you to "agree/support?"

33. **13. Forest Management Planning and Implementation:** NJ DEP should be directed to identify and implement steps to measure and reduce deer densities in our public forestlands to ecologically sustainable levels to enable our forests to regenerate. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

34. 13. What would bring you to "agree/support?"
-

35. **14. Forest Management Planning and Implementation:** Increased funding and staff to NJDEP is necessary to carry out these activities and address these goals. Funding can include increased funding through the annual budget, new state funding sources such as those identified in Task Force proposals, external grant programs and other government entities (such as funding through the Inflation Reduction Act) that can assist the agency in completing these goals. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

36. 14. What would bring you to "agree/support?"
-

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THIRD Survey - NJFTF Conceptual Framework

This THIRD Revision of the Framework. Here are some highlights of changes we made based upon input received:

- We removed the reference to the NJDEP 14-step process as the basis for the initial rule-making governing forest management plans.
- We removed the reference to the federal 30x30 initiative under ecological reserves and instead refer to a significant percentage of set-asides to be determined by the inventory and planning process.
- We added mention of identifying areas for afforestation and reforestation to advance carbon sequestration. (Suggested by Sen. Smith during a recent update. We agree.)
- We added language clarifying that commercial timber management should not be a goal of forest management plans on public land, but that wood products can be sold when cutting and removal is a necessary part of an approved plan to achieve ecological, climate or other non-commercial goals.

We believe that these changes clarify and strengthen the framework, address issues that have been raised, and reflect areas of broad agreement.

* Required

1. Name *

2. Please indicate if you are the authorized representative of an organization and the name of that organization. *

3. Level of support for overall framework. *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Not likely to support without significant revisions
- ☐ Disagree/not support

4. What would bring you to "agree/support?"

5. Level of support for Statewide Planning and Inventory section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

6. What would bring you to "agree/support?"

7. Level of support for Forest Management and Implementation section *

Mark only one oval.

- ☐ Agree/support
- ☐ Likely to support with some revisions
- ☐ Note likely to support without significant revisions
- ☐ Disagree/not support

8. Comment on Forest Management Planning and Implementation section

9. **1. Statewide Planning and Inventory:** Statewide Planning and Inventory: Protection * and management of NJ's public forests must be based upon a comprehensive planning and mapping process at the landscape level based upon sound science and data. Additional appropriate inventories of significant biota and resources, as needed and feasible, should be included. This planning process should be directed by a scientific advisory panel* as well as require robust public participation throughout the process. Initial inventory and planning process should focus on state owned lands and then extend to significant forested parcels of county, municipal and other lands acquired using state funding (acreage to be determined in the rulemaking).

** The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Non-Game Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

Check all that apply.

- ☐ Agree/Support
- ☐ Disagree

10. 1. What would bring you to "agree/support?"

11. **2. Statewide Planning and Inventory:** A formal rulemaking process for the development of Forest Stewardship Plans, Ecological Restoration Plans, Natural Resource Stewardship Plans, and other plans on public forested lands will be conducted in parallel with the inventory and planning process and in accordance with Administrative Procedures Act. The rulemaking will be informed by and consistent with statewide planning and inventory efforts. The rulemaking should not take longer than three years to be adopted. *

Check all that apply.

☐ Agree/Support

☐ Disagree

12. 2. What would bring you to "agree/support?"

13. **Revised to:** *

3. Statewide Planning and Inventory: A separate rulemaking process, consistent with the Administrative Procedures Act, will be initiated and completed within one year to govern the development of forest stewardship, ecological restoration, natural resource stewardship or other forest management plans on state as well as significant forested parcels of county or municipal lands acquired with state funding (acreage to be determined in the rulemaking). No newly initiated plans will be approved for one year after rulemaking begins (except for necessary fire management activities or emergency scenarios like natural disasters).

Check all that apply.

☐ Agree/Support

☐ Disagree

14. 3. What would bring you to "agree/support?"

15. **4. Statewide Planning and Inventory:** The planning process should identify areas * to be set aside through designations including ecological reserves and/or protected natural areas (as defined by the Natural Areas Program in NJ) which will act as set-asides with limited management except as necessary to address ecological threats and as determined by an oversight council.* One of the primary goals for these areas is to promote growth of maturing forests and to provide for future old growth forests for their carbon and ecological benefits. While we anticipate that a significant percentage of public forest lands should be set aside for these purposes, the specific acreage and location of these lands should be determined through the inventory and planning process.

This may be accomplished through an overhaul and expansion of the current Natural Areas Program. Or, a new program and entity could be established for this purpose.

The planning process should identify areas where afforestation and reforestation should occur on public lands, and measures needed to ensure success, consistent with the carbon sequestration goals identified in the NJDEP Global Warming Response Act 80x50 report.**

** The oversight council should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists). There should be no Governor or legislative approvals needed for appointments to move forward.*

*** State climate goals - NJ's Global Warming Response Act 80x50 Report*

Check all that apply.

☐ Agree/Support

☐ Disagree

16. 4. What would bring you to "agree/support?"

17. **5. Statewide Planning and Inventory:** The planning process must identify areas where active management is needed to address current and future threats to ecological health, such as invasive species proliferation, or to address goals as identified in the planning process. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

18. 5. What would bring you to "agree/support?"

19. **6. Statewide Planning and Inventory:** The planning process must recognize the importance of adaptive management, whereby planning, inventory, and management approaches are adjusted over time based upon new data and changing circumstances in our forests. The statewide planning and inventory should be updated at least every 10 years after completion of the first Statewide inventory. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

20. 6. What would bring you to "agree/support?"

21. **7. Statewide Planning and Inventory:** One guiding principle of the planning and rule-making process must be to consider the significant variation in our forests, both on a macro (landscape) level and micro level. For example, the uniqueness of the entire Pinelands ecosystem compared to other regions of the state should be acknowledged as well as the variations that occur at a much finer spatial scale within a forest. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

22. 7. What would bring you to "agree/support?"

23. **8. Forest Management Planning and Implementation:** NJ's public forestlands must be protected and managed to maintain and enhance carbon sequestration and storage as necessary to advance state climate goals* while advancing equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities.** Planning and inventories should guide the prioritization of management goals in specific areas, recognizing that these goals will be achieved across the aggregate of acres owned by the state rather than on one single acre in any specific area. Areas having historical, cultural and spiritual significance for Indigenous People should be characterized and protected. *

** State climate goals - NJ's Global Warming Response Act 80x50 Report*

**** low intensity recreation as defined means non-motorized outdoor, nature-based recreational activities, including, but not limited to, boating, swimming, fishing, hiking, hunting, trapping, picnicking, nature observation, photography, horseback riding, tent and shelter camping, cross-country skiing, bicycling, snowshoeing, rock climbing, ice climbing, and enjoyment of open space.*

Check all that apply.

- ☐ Agree/Support
☐ Disagree

24. 8. What would bring you to "agree/support?"

25. **9. Forest Management Planning and Implementation:** All forest management plans (forest stewardship, ecological restoration, natural resource stewardship etc,) on public land must be developed in accordance with the process established through rulemaking noted in the previous section (bullets #2 and #3) and continuously guided by the statewide planning and inventory as it is developed. *

Check all that apply.

☐ Agree/Support

☐ Disagree

26. 9. What would bring you to "agree/support?"

27. **10. Forest Management Planning and Implementation:** Meeting these goals requires multiple management, restoration and protection approaches that should be guided by sound science and be consistent with and guided by the inventory and planning process. *

Check all that apply.

☐ Agree/Support

☐ Disagree

28. 10. What would bring you to "agree/support?"

29. **11. Forest Management Planning and Implementation:** Prescribed burns are a necessary management tool to reduce risk of catastrophic fires in ecosystems like the Pine Barrens. Additionally, prescribed burns should be deployed in order to meet other critical ecological objectives throughout the state. The current rules related to burn plans and the use of fire should be revisited and revised in order to make this management tool one that can be more successfully utilized by the NJ Forest Fire Service and other trained experts.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

30. 11. What would bring you to "agree/support?"
-

31. **12. Forest Management Planning and Implementation:** A more intensive effort is * needed to address the impacts of invasive non-native species. Efforts to address invasives must address insects, animals, plants, pathogens, and microorganisms. One approach is to re-convene The NJ Invasive Species Council, created in 2004 but currently dormant, and charge them with updating and implementing a state-wide strategic plan to address the issue.

Check all that apply.

- ☐ Agree/Support
☐ Disagree

32. 12. What would bring you to "agree/support?"
-

33. **13. Forest Management Planning and Implementation:** NJ DEP should be directed to identify and implement new and innovative steps to measure and reduce deer densities as necessary in our public forestlands to ecologically sustainable levels to enable our forests to regenerate. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

34. 13. What would bring you to "agree/support?"

35. **14. Forest Management Planning and Implementation:** Commercial timber management should never be the goal for any forest plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate or other noncommercial goals. *

Check all that apply.

- ☐ Agree/Support
☐ Disagree

36. 14. What would bring you to "agree/support?"

37. **15. Forest Management Planning and Implementation:** Increased funding and staff to NJDEP is necessary to carry out these activities and address these goals. Funding can include increased funding through the annual budget, new state funding sources* external grant programs and other government entities (such as funding through the Inflation Reduction Act) that can assist the agency in completing these goals. *

** Potential ideas to be detailed in the final report.*

Check all that apply.

- ☐ Agree/Support
☐ Disagree

38. 15. What would bring you to "agree/support?"
-

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NJFTF - Final Framework Sign-on

Please use this form to support or not support the final framework overall.

The four

co-chairs have worked hard to find common ground, which has required some give-and-take. We hope that Task Force participants will do the same and consider supporting the framework if you believe that on balance it includes significant steps forward on important issues, rather than judging it on the basis of whether you agree with every single recommendation and the way it is worded. Your endorsement of the overall framework does not imply that that you support every detail of the framework. Rather, it is a broad consensus on general topics on which we can agree.

DUE: December 27, 2022

If you are submitting on behalf of an organization, please ensure that your organization has reviewed and approved the submission.

* Required

1. Name of Submitter (point of contact) *

2. Please list any academic credentials and certifications that you have

3. Town of Residence *

165x

4. County of Residence *

Mark only one oval.

- ☐ Atlantic
- ☐ Bergen
- ☐ Burlington
- ☐ Camden
- ☐ Cape May
- ☐ Cumberland
- ☐ Essex
- ☐ Gloucester
- ☐ Hudson
- ☐ Hunterdon
- ☐ Mercer
- ☐ Middlesex
- ☐ Monmouth
- ☐ Morris
- ☐ Ocean
- ☐ Passaic
- ☐ Salem
- ☐ Somerset
- ☐ Sussex
- ☐ Union
- ☐ Warren

5. Do you serve on the Board or as a Trustee or decision-maker on any organizations (include the one you are representing)? Please list (include the one you are representing).

6. Organization (if you are submitting on behalf of an organization)

Mark only one oval.

- ☐ Allegheny Society of American Foresters (NJ Division)
- ☐ Animal Protection League of NJ (APLNJ)
- ☐ Appalachian Mtn Club
- ☐ Beaver Lake Realty Company
- ☐ Coalition to Ban Unsafe Oil Trains
- ☐ Duke Farms
- ☐ Empower NJ
- ☐ Environmental Education Fund
- ☐ Friends of Hopewell Valley Open Space
- ☐ Friends of the Drew Forests
- ☐ Great Egg Harbor Watershed Association
- ☐ Great Swamp Watershed Association
- ☐ Hackensack Riverkeeper
- ☐ Highland Park Shade Tree Commission
- ☐ Highlands Coalition
- ☐ Highlands Commission
- ☐ League of Humane Voters of NJ
- ☐ Lebanon Township Environmental and Open Space Commission
- ☐ Monmouth County Audubon Soc
- ☐ Morris County Park Commission
- ☐ National Wild Turkey Federation, NJ Chapter
- ☐ NJ Audubon
- ☐ NJ Conservation Foundation
- ☐ NJ Environmental Lobby
- ☐ NJ Forest Watch
- ☐ NJ Forestry Association
- ☐ NJ Nursery & Landscape Association
- ☐ NJ Outdoor Alliance PAC
- ☐ NJ State Federation of Sportsmen's Club
- ☐ NJ Tree Farm

168x

- ☐ Norwood Environmental Comm
- ☐ NY NJ Trail Conference
- ☐ Ocean County Dept Parks and Recreation
- ☐ Passaic River Coalition
- ☐ Pinelands Commission
- ☐ Pinelands Preservation Alliance
- ☐ Princeton Environmental Commission
- ☐ Princeton Shade Tree Commission
- ☐ Raritan Headwaters Association
- ☐ Raritan Twp Environmental Commission
- ☐ Ridge and Valley Conservancy
- ☐ Ridgeview Conservancy
- ☐ Save Barnegat Bay
- ☐ Sierra Club, NJ Chapter
- ☐ Somerset County Parks
- ☐ Sourland Conservancy
- ☐ Support Roaring Rock Park
- ☐ The Nature Conservancy, NJ Chapter
- ☐ The Watershed Institute
- ☐ The Wildlife Society, NJ Chapter
- ☐ Thonet Associates
- ☐ Tri-County Sustainability
- ☐ Turtle Can
- ☐ Union County Parks
- ☐ UU Faith Action NJ
- ☐ Woods and Wayside
- ☐ Other

7. Your position with the organization

169x

8. Do you sign-off on the framework? *

Mark only one oval.

☐ Yes

☐ No

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Appendix D-4: Original topic prioritization survey

NJ Forest Task Force

Test

* Required

1. Please rank the topics in order of priority for NJ (1 is the top priority) *

Mark only one oval per row.

	1 - Most Important	2	3	4	5	6	7
Economics	☐	☐	☐	☐	☐	☐	☐
Tree harvest/timber management	☐	☐	☐	☐	☐	☐	☐
Passive management/protected areas	☐	☐	☐	☐	☐	☐	☐
Fire	☐	☐	☐	☐	☐	☐	☐
Carbon storage/sequestration	☐	☐	☐	☐	☐	☐	☐
Climate change mitigation and adaptation	☐	☐	☐	☐	☐	☐	☐
Invasive species, pests, pathogens	☐	☐	☐	☐	☐	☐	☐
Illegal/Recreational use of off-road vehicles	☐	☐	☐	☐	☐	☐	☐
Species biodiversity and habitat	☐	☐	☐	☐	☐	☐	☐
Loss of private forestlands	☐	☐	☐	☐	☐	☐	☐
Deer	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

2. Are you interested in serving on a subcommittee? *

Mark only one oval.

- ☐ Yes
☐ No
☐ Listen only

171x

3. Do you represent *

Mark only one oval.

- ☐ A nonprofit organization
- ☐ A government entity
- ☐ Private resident
- ☐ Press
- ☐ Homeowners association

4. Would you like to receive updates from the NJ Forest Task Force? *

Check all that apply.

- ☐ Yes
- ☐ No

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Appendix D-5: Collaboration Table

[illegible]

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Exploring Conservation and Proforestation Options for NJ Forests

NEW JERSEY Forest Task Force

June 30, 2022 10 AM

REGISTER



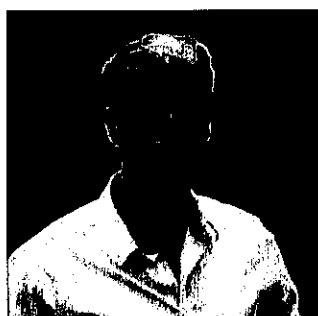
William Moomaw, PhD: William Moomaw is Professor Emeritus, Tufts University and Distinguished Visiting Scientist at Woodwell Climate Research Center. He holds a PhD from MIT and previously taught chemistry and was Director of Environmental Studies at Williams College. He is a physical chemist who helped develop the first ozone layer protection legislation while working for the U.S. Senate and has been a lead author of five Intergovernmental Panel on Climate Change (IPCC) Reports including the 2007 report that shared the Nobel Peace Prize. He has published extensively on technical solutions to reduce climate altering emissions. He is currently working internationally and nationally to identify and implement Natural Climate Solutions that accumulate additional atmospheric carbon out of the atmosphere in forests, wetlands, and soils. In 2019, he was elected a Fellow of the American Association for the Advancement of Science for his "contributions to our understanding of climate change and its global impacts and to the work of the Intergovernmental Panel on Climate Change."



Ed Faison, PhD: Senior Ecologist, Highstead Foundation. Ed's work focuses on long-term forest change, deer-forest interactions, the ecology of wildlands, and natural climate solutions. Ed also advises conservation groups, educators, and land trusts about stewardship and forest monitoring. He holds master's degrees from the University of Vermont (Botany-Field Naturalist) and Harvard (Forest Science), and a PhD from the University of Massachusetts, Amherst (Dept. of Environmental Conservation).



Tony D'Amato, PhD: Professor of Silviculture and Applied Forest Ecology and Director of the Forestry Program at the University of Vermont. He received his B.S. in Forest Ecosystem Science from the University of Maine, M.S. in Forest Science from Oregon State University, and PhD in Forest Resources from University of Massachusetts. He was a faculty member for seven years at the University of Minnesota and Bullard Fellow at Harvard University's Harvard Forest prior to joining the University of Vermont in January 2015. His research focuses on long-term forest dynamics, disturbance effects on ecosystem structure and function, and silvicultural strategies for conferring adaptation potential within the context of global change, including introduced insects and diseases.



William Keeton, PhD: Professor of Forest Ecology and Forestry at the University of Vermont's (UVM) Rubenstein School of Environment and Natural Resources. At UVM he directs the Carbon Dynamics Laboratory and is a Fellow in the Gund Institute for Environment. He also serves as Chair of the IUFRO (International Union of Forest Research Organizations) Working Group on Old-growth Forests and Reserves. His research focuses on forest disturbance dynamics, riparian ecology, forest carbon, old-growth forests, ecological silviculture, and sustainable forest management in the U.S. Northeast and Pacific Northwest, but also takes him frequently to Central and Eastern Europe where he serves on the board for Science for the Carpathians and is currently a Fulbright Scholar. He has on-going research also in Chilean Patagonia and Bhutan related to wildfires and forest-stream interactions. In the U.S. he serves on the Board of Trustees for the Vermont Land Trust and on the science advisory committee for the Forest Ecosystem Monitoring Cooperative. His new co-edited book is entitled "Ecology and Recovery of Eastern Old-Growth Forests," published by Island Press. He holds a B.S. in Natural Resources from Cornell University ('90), a Masters in Conservation Biology and Policy from Yale University ('94), and a Ph.D. in Forest Ecology from the University of Washington (2000).

Appendix E Proposals

Appendix E-1: Blank proposal form

Appendix E-2: Criteria for acceptance for discussion

Appendix E-3: Proposals that were accepted, discussed, and reached consensus. At least three of four co-chairs agree that proposal met criteria.

Appendix E-4: Proposals that were accepted and discussed during task force meetings but consensus not reached. At least three of four co-chairs agree that proposal met criteria.

Appendix E-5: Proposals that were accepted but not discussed. At least three of four co-chairs agree that proposal met criteria.

Appendix E-6: Proposals that needed revision or co-chairs were split on acceptance (fewer than three of four co-chairs accepted)

Appendix E-7: Proposals that were not accepted: At least three of four co-chairs agree that proposal did not meet criteria.

Appendix E-I: Blank proposal form

NJFTF Proposal Submission

Please use this form to submit your proposal for discussion and consideration by participants in your workgroup. Statements and data should be validated by cited literature - please provide documents or links of material that support your ideas. You can upload up to 10 documents here. Please include links in your narrative section. If you have trouble, please contact your workgroup co-chair.

Submit a proposal for one specific recommendation that could be included in state legislation related to protection or management of our public forestlands. If you have multiple recommendations, please submit separate proposals for each one.

DUE: JULY 5, 2022

If you are submitting a proposal on behalf of an organization, please ensure that your organization has reviewed and approved the submission.

Please indicate if more than one individual or more than one organization is submitting the proposal. Collaborative work is encouraged.

Please label your file uploads using this format:
Workgroup.YourLastName.FileName

For example:

EcolHlth.Smith.DeerManagement1
EcolHlth.Smith.DeerManagement2
Climate.Smith.DeerManagement1
Climate.Smith.Deer Management2

Be mindful of copyrighted material. There are search engines where you can find publicly available (open access) material such as:

PubMed.gov - <https://pubmed.ncbi.nlm.nih.gov/>

DOAJ - <https://doaj.org/>

Elsevier - <https://www.elsevier.com/open-access/open-access-journals>

CORE - <https://core.ac.uk/>

* Required

176x

1. Name of Submitter (point of contact) *

2. Name(s) of additional submitters *

3. Organization (point of contact) *

4. Additional organizations *

5. Has your organization signed off on this submission? *

Mark only one oval.

☐ Yes

☐ No

6. Workgroup *

Check all that apply.

☐ Climate

☐ Ecological Health

7. General Topic Area *

Mark only one oval.

☐ Biodiversity

☐ Climate

☐ Deer

☐ Fire

☐ Funding/economics

☐ Habitat

☐ Invasives

☐ Passive management

☐ Recreation

☐ Stewardship/management

☐ Timber Harvest

☐ Water Quality

☐ Other: _____

178x

8. Proposal Title *

9. Proposal Narrative (please cite your sources in the following section) - 2500 characters *

10. References, Peer-Reviewed (please upload materials cited here)

Files submitted:

11. Other References (please upload materials cited here)

Files submitted:

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Appendix E-2: Criteria for acceptance for discussion



SIERRA CLUB
NEW JERSEY CHAPTER



NJ Forest Task Force

Criteria s for accepting, rejecting, or revising a proposal.

Acceptance:

- Proposal addresses a NJ forest topic
- Addresses public lands in NJ
- Proposal presents a single, clear recommendation that can be addressed through legislative action
- Recommended action is within the purview of the task force charge
- Provides documentation for statistics, data, or literature cited

Revise:

- Multiple ideas in one proposal (revise to include one idea per proposal)
-

Reject:

- Not a proposal
- No clear idea presented
- No clear recommendation presented
- Does not address the topics

Possible questions to address in proposals that were sent to participants:

Some questions to be discussed include (but are not limited to):

What policy or management changes are needed on our public forests in response to climate change?

How should our public forests be cared for through management, restoration work, and protection in view of climate change?

What steps should be taken to increase the overall health and resiliency of our public forests in relation to climate change?

In view of climate change, should certain actions be taken to address carbon sequestration and carbon storage?

Are additional steps needed to protect against potential catastrophic wildfires, similar to those we see in other states?

How might these initiatives be funded?

What role should harvesting trees play to help achieve climate objectives on our public forests?

Appendix E-3

Proposals that were accepted, discussed, and reached consensus

Proposals that were submitted and accepted by the co-chairs as aligning with the criteria for acceptance. At least three of four co-chairs agree that proposal met criteria. These proposals were discussed by workgroup participants and consensus was reached to approve the ideas presented. There were 26 proposals in this category.

Narratives were limited to 2500 characters. Proposal sponsors were invited to also submit references, which are not included here due to space limitations but are available using the sponsor's citation(s) when provided. Footnotes in the proposals indicate a reference to an article, file, memo, or other document. Note that references submitted ranged from unpublished opinions, magazine and news articles, webinars, and journal articles (some peer-reviewed and some not peer reviewed).

Chris Hepburn, Ph.D.

Push Legislation (S-2186) that Limits Invasive Plants

"There is wide agreement that invasive plants are a problem for New Jersey forests. The New Jersey State Forest Action Plan lists Invasive plants as a DCA (Damage Causing Agent) and notes that invasive plants are becoming much more prevalent within our forest understories and are causing a variety of negative ecological effects.¹ Invasive plants reduce wildlife habitat diversity and quality even at low densities and also reduce forest productivity.²

The New Jersey Invasive Species Strike Team has completed 4000 eradication of invasive plant populations, yet in 2021 listed 48 plant species as widespread and causing significant harm in natural areas.³ Their work has been supported by the NJDEP Division of Fish & Wildlife and many other nonprofit entities.⁴

And yet, at the same time that funds go toward eradicating invasive plants, many of the invasive plants that invade New Jersey forests are still for sale. The Strike Team's website contains a list of over 90 invasive or potentially invasive plant species that are commonly available for purchase.⁵ It is hard to believe, but while land stewards are spending time and money to control Barberry, for just one glaring example, stores are offering Barberry for sale!

This is despite it being known for decades that the ornamental plant trade is the primary means through which invasive plants enter the U.S. ⁶ And, while state regulations have been found to work to reduce sales of invasive plants, their effectiveness is decreased when neighboring states still sell the invasive plants. ⁶

New Jersey lags behind nearby states. As reported in 2016, New York, Connecticut, Massachusetts and New Hampshire have banned the cultivation, sale or use of [popular invasive species].⁷ Not only do those four states limit the sale of select invasive plants⁸, but Maryland, Delaware, and Virginia all have recently voted to set similar limits (Virginia is in the study phase).⁹

In March, NJ Senators Bob Smith and Linda R. Greenstein introduced bill S-2186 that "Prohibits sale, distribution, or propagation of certain invasive plant species without permit from Department of

Agriculture.” 10 It won’t be easy for New Jersey’s plant growers to adjust but it is necessary and this bill gives them two years to do so.

While passing this bill may not fall under 'management activities' for public forestlands, it is fundamental to protecting forest health. Invasive plants that are grown in the state or planted in private gardens are invading New Jersey forests, so the Forest Task Force should ensure that this bill is enacted as soon as possible.

Constance Katzenbach

Deer population management proposal

We ask that the NJ Forest Task Force consider a proposal to change the current NJDEP DFW regulations to create a pilot program with a new category of deer hunting license, a commercial deer harvest license (CDHL). Infrastructure for the regulated commercial harvest of wildlife (furbearers, fish) already exists. That the current level of deer population in NJ is deleterious to forest health is well documented. It is also evident that population control measures by NJ DEP DFW are inadequate in meeting this challenge in the face of declining hunter enrollment. A CDHL pilot program could be monitored closely, relying on research based data, to targeted areas. A CDHL program may provide a cost effective “green” tool in returning deer population to sustainable levels. The citations attached, by K.C Van Cauteren, et.al., (2011) outline the proposal most succinctly. Additional citations on recent (2019) deer population surveys by the NJ Farm Bureau and a comprehensive overview of the effect of increasing deer population on forest ecology from the 1970s to the present by J.Kelly (2019) are included.

Greg Gorman

Study the impacts of forest management techniques on New Jersey’s aquifers and water supplies.

Considering the importance of New Jersey’s aquifers to our drinking water supply and quality, any discussion of forest management should include an analysis of the impact of management techniques on New Jersey’s aquifers. (See Climate.Gorman.WaterQuality1-Map of NJ Aquifers). Management techniques cover a wide range of methods, including tree thinning, prescribed burns, harvesting of mature tree stands and logging. Of most importance are the Kirkland-Cohancy Aquifer and the Highlands.

From the BC (British Columbia) Journal of Ecosystems and Management, there was acknowledgement that land degradation will have a major impact on carbon capture, recharge rates and forest vitality. But much is unknown. For example, there was also an admission in the study that effects of canopy openness are under-studied (Climate.Gorman.WaterQuality2-Bart Muys et. al. 2021). Forest management techniques may also have an impact on water table elevation, a vital consideration for New Jersey’s management of its drinking water supplies (Climate.Gorman.WaterQuality3-Brian D. Smerdon et. al. 2009).

Different forest management techniques, such as thinning the forest or prescribed burns, will likely have differing impacts to our water ecosystems with significant and possibly adverse consequences for generations to come. Studies of the impact of forest management should highlight protection of vital watersheds where the state’s major population centers, such as Newark and Camden, get their water from.

In summary, any discussion of how we keep New Jersey’s forests resilient in the face of climate change should consider the implications to our aquifers and the availability of plentiful, clean water. It is recommended that any legislation allocate funds for the monitoring and analysis of forest management and its impacts on water supply and quality.

Jaclyn Rhoads

Ecological Community Conservation Plans

The Department should develop conservation plans designed to promote the recovery or maintenance of ecological communities based on the best scientific information available. This includes a multifaceted approach to evaluating the health of the system including all aspects of the ecosystem - water, plants, trees, and animals. Using this plan, land owners or organizations interested in helping to manage and/or steward the ecological community can propose management actions. These actions may include a specific forest stewardship plan or rare plant action plan, but a comprehensive evaluation must come first.

Additional details can be found in the other references section. I have also included three websites of examples and supporting research.

Joe Basralian

Forest to Faucet Block Rate Water Billing

It is widely accepted in peer-reviewed literature that healthy forests help purify water.

New Jersey can raise funds to pay for additional forest health initiatives by charging a small number of New Jersey's largest single-family home water users a little bit more per unit for water, after their usage has breached a threshold set far above the average resident's water usage. This is called increasing block rate pricing. New Jersey should move from its uniform rate structure to an increasing block rate structure. It is already very common in states, including Massachusetts, North Carolina, Georgia, Arizona and others. [Attachment 1]

Average NJ household water bill per month is approximately \$60, inclusive of base rate service charges and per-unit charges. [2-2a]

The average American uses around 88 gallons per day per person. Average family of four would use around 10,500 gallons in a 30-day period, according to the U.S. EPA. An example of block rate pricing is shown mid-way down the attached page. A more detailed example is toward the bottom of the page. [3] Further discussion of block rate pricing is shown in [4].

Simplistic Example: If a single-family home pays \$2.00 per thousand gallons of water, and uses 30,000 gallons of water in a month, it would pay \$60 per month for water use (not including base rate service charges). That user has a large swimming pool and regularly uses its sprinkler system to water an expansive lawn, even when it rains. If the water rate after the first 20,000 gallons used rises to \$2.50 per thousand gallons, the single-family home's total bill would rise by \$5 per month to \$65. This is a very small amount additional to pay for someone who has substantial means and has probably given little thought to water conservation.

Benefits of block rate pricing for water:

- Will raise funding for New Jersey's additional monitoring and managing of forests' ecological function.
- Only single-family households with the greatest means will pay a little more.
- Encourages conservation by the most inefficient users of water. Researchers saw 17% reduction in attached example. [5]
- Research shows that people are willing to pay for ecological functions. [6]
- Less water use reduces the utilities' costs of providing water and of treating wastewater.
- Less water use leaves more water upstream for use by the environment and in drought emergencies.

- Pertinency to forest conservation because healthy forests help purify water. All proceeds from the block rate pricing increment will be used for forest conservation, in service of clean water production.

Joe Basralian

Extend the Realty Transfer Fee progression to sales of homes \$1.5 million and above

Stewarding New Jersey's forests to increase carbon sequestration may require raising more money for NJDEP.

To meet this need, it is logical to extend New Jersey's progressive Realty Transfer Fee rate to new breakpoints above \$1 million.

BACKGROUND: New Jersey's Realty Transfer Fees (RTFs) are paid by nearly all sellers of real estate in New Jersey. The fees were instituted in 1968 to cover the cost of recording the transactions in deed books. By 2021, New Jersey's RTFs had become a major revenue source, raising \$526 million [Attachment 1, p5 of PDF] out of total State revenue of \$47 billion [Attachment 1, p10]. In 2022, RTFs are expected to raise \$626 million [Attachment 1, p5].

PROGRESSIVE FEES: The fees are charged to sellers upon the sale of their home at a rate that starts at \$2.90 (per \$500 of home value) for homes sold for \$150,000 and less, and rise to \$6.05 (per \$500 home value) on homes sold for \$1,000,000 or more. [Attachment 2, Page 2] The break-points for the rising fee rates are at \$150,000, \$200,000, \$550,000, \$850,000 and \$1,000,000. In addition, buyers of homes of \$1,000,000+ pay a 1% RTF. [Attachment 3] At current rates, a seller of a \$1 million home pays \$9,575 in RTF. The fees are collected at closing, and remitted to the State of New Jersey.

RECOMMENDATION -- EXTEND THE PROGRESSIVE FEE STRUCTURE: The highest rate paid by sellers is \$6.05 (on home sales of \$1 million or more). This proposal suggests new break points be added at \$1,500,000 and \$2,000,000, at rates above \$6.05. There were 60,000 NJ homes estimated to be worth more than \$1 million in 2018. [4] There were 1,874 homes listed for sale at \$1.5 million+, of which 1,106 were listed at \$2 million+ on 6/22/22. [5] The wealthiest sellers would pay a little bit more.

CURRENT USES OF RTF FUNDS: RTF funds are used by the state for investments such as neighborhood revitalization, shore protection and the state's general fund. Counties also obtain a disbursement of these funds. [6]

DEDICATE FUNDING FROM THE RTF TO FOREST CARBON SEQUESTRATION STRATEGIES: NJDEP has over 70 programs that receive Dedicated Funds. [Attachment 1, p12-13] New DEP programs for Forest Carbon Sequestration should also receive dedicated funding.

RELEVANCE OF RTF TO FOREST CARBON SEQUESTRATION. It takes more than 100 full-grown Douglas Fir trees to build a 5,000 sq ft home. [7] Home size correlates with home price, so sellers of such homes -- which are responsible for the removal of more trees from the landscape -- would logically contribute at a higher rate to forest carbon sequestration programs. The new RTF would apply to residential ("Class 2") homes only, not commercial properties.

John Landau

Invasive Species Management Regional Collaboration

185x

NJDEP and/or a NJ Invasive Species Council shall establish formal and regular regional group and peer-state Invasive Species Management (ISM) relationships. Collaboration to build coordinated ISM strategies, shared knowledge bases, joint best management practices and reusable educational outreach materials will generate economies of scale that enable more efficient and effective invasives management to better protect our public forests.

Background:

1. NJ ISM challenges are not unique to NJ. Nearly all invasive diseases, flora, and fauna are detected first outside of NJ. NJ spotted lantern fly and emerald ash borer responses are examples of individual programs that gained considerable value from collaboration. But on a broader scale the data shows considerable disconnection and inconsistency between neighboring states.

(1) Bradley et al, "Breaking down barriers to consistent, climate-smart risk assessments of invasive plants: a case study of US Northeast states", 2022, Ecosphere, <https://doi.org/10.1002/ecs2.4014>

(2) Beaury et al (2021) "Invasive plant regulations in the United States are reactive and inconsistent", Journal of Applied Ecology

2. Invasive species succeed within an ecoregion, so peer state invasives species management coordination within an ecoregion that crosses the state border (eg Northern NJ and southern NY; Central NJ and SE PA) can be more important than coordination across ecoregions (eg The Pinelands and the Highlands).

3. Climate change facilitates both the migration of invasive species from warmer climates and the awakening of "sleeper" species that are already in NJ and are likely to become invasive as NJ conditions for propagation and growth become more favorable. This is a common threat to Mid-Atlantic and Northeast states.

(3) Prioritizing Range Shifting Invasives

(4) Are You Sleeping?

Methodology:

1. NJDEP and/or a NJ Invasives Species Council shall designate liaisons to participate in the Northeast Invasive Species Councils Work Group and symposia sponsored by the Northeast Regional Invasives Species and Climate Change Council (NE RISCC)

(5) Summary of 11-5 IPCs Working Group Meeting

(6) RISCC+Symposium+2022+Summary_Final.pdf

2. NJDEP and/or a NJ Invasives Species Council shall formally pursue peer-wise collaborations with neighboring states including PA, NY, DE and MD

3. NJDEP and/or a NJ Invasives Species Council shall annually summarize collaborative Invasives Species Management programs and propose continued improvements for further collaboration.

NJDEP and/or a NJ Invasive Species Council shall establish formal and regular regional group and peer-state Invasive Species Management (ISM) relationships. Collaboration to build coordinated ISM strategies, shared knowledge bases, joint best management practices and reusable educational outreach materials will generate economies of scale that enable more efficient and effective invasives management to better protect our public forests.

[(N)=EcolHlth.Landau.ISMcollab. N citations attached]

Background:

1. NJ ISM challenges are not unique to NJ. Nearly all invasive diseases, flora, and fauna are detected first outside of NJ. NJ spotted lantern fly and emerald ash borer responses are examples of individual programs that gained considerable value from collaboration. But on a broader scale the data shows considerable disconnection and inconsistency between neighboring states.

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(2) Beaury et al (2021) "Invasive plant regulations in the United States are reactive and inconsistent", Journal of Applied Ecology

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3. Climate change facilitates both the migration of invasive species from warmer climates and the awakening of "sleepers" species that are already in NJ and are likely to become invasive as NJ conditions for propagation and growth become more favorable. This is a common threat to Mid-Atlantic and Northeast states.

(3) Prioritizing Range Shifting Invasives

(4) Are You Sleeping?

Methodology:

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(5) Summary of 11-5 IPCs Working Group Meeting

(6) RISCC+Symposium+2022+Summary_Final.pdf

2. NJDEP and/or a NJ Invasives Species Council shall formally pursue peer-wise collaborations with neighboring states including PA, NY, DE and MD

3. NJDEP and/or a NJ Invasives Species Council shall annually summarize collaborative Invasives Species Management programs and propose continued improvements for further collaboration.

John Landau

Public Forest Watershed Services Protection

Conservation of NJ Public Forests Infrastructure services for flood mitigation and drinking water shall be a major objective within NJ public forest management policy and individual public forest management plans.

Public Forest Watershed services analyses shall be created using green infrastructure water quantity and quality assessment best practices and NJDEP Extreme Precipitation Projections.

Background:

Flood control and drinking water for much of New Jersey require protection from the effects of climate change. Extreme precipitation events are getting worse. The watershed services provided by public forests are critical to mitigate increased risks and costs to the developed areas of NJ.

1. "...there is a high likelihood that precipitation intensity will increase into mid and late century in all parts of the state...

...projections suggest that the amount of precipitation associated with the 100-year, 24-hour storm will increase, on average, by 20% to 25% above published values in northern NJ counties. ...a 17% chance that precipitations will increase by as much as 45% to 50% ...in some counties."

<https://njprojectedprecipitationchanges.com/> and (1)

a. NJDEP is updating stormwater management rules to require development projects to manage to these projected extreme rainfall projections.

b. A 100 year, 24 hour storm has a 1% probability to occur in any one year but a 39.5% probability of occurring at least once in any 50 year planning period. (2)

2. Public forests are the catchment area for 25% of rainfall (3) in densely populated NJ (4). Every county in NJ is classified by the US OMB as urban. (5)

a. Healthy NJ forests provide critical pluvial (surface water) and fluvial (riverine) flood risk mitigation and drinking water sourcing for most of NJ. (eg the NJ Highlands Water Protection and Planning Act)

b. Healthy forests provide very significant rainfall interception, infiltration and evapotranspiration services that impact their extended watershed (6)

c. eg Evapotranspiration services typically return about 50% of annual precipitation back into the atmosphere, water that does not add to downstream flow. (7)

Methodology:

1. An advisory council of NJDEP and private watershed experts shall be created to define practices to assess and manage the watershed services of NJ Public Forests. The assessment shall include an estimate of the economic value.(eg <https://landscape.itreetools.org/maps/>)

2. The defined practices shall be consistent wherever appropriate with the NJDEP practices for development. (8) (9)

Conservation of NJ Public Forests Infrastructure services for flood mitigation and drinking water shall be a major objective within NJ public forest management policy and individual public forest management plans.

Public Forest Watershed services analyses shall be created using green infrastructure water quantity and quality assessment best practices and NJDEP Extreme Precipitation Projections.

Kristi MacDonald

Establishing NJ Forest Ecoreserves to preserve and protect large forest tracts for their roles in supporting Biodiversity, Watersheds, Climate Resilience, Research and Passive Recreational uses. In the early 1700s, there were 4.7 million acres of forestland in NJ (NJDEP 2010); by 2015, about 1.5 million acres remained (Lathrop et al. 2020). Given this large-scale historic loss and the continuing threat of loss, fragmentation, and degradation, we propose that all large (> 500-1,000 acre) forests remaining in the state be permanently protected as ecological reserves. Large forest tracts serve critical ecosystem functions necessary for biodiversity conservation, sustainable water resources, carbon sequestration, and human health. Incompatible uses should be prohibited within ecological reserves including timber harvesting, removal of dead or damaged trees (salvage harvesting), commercial mining and excavation. While smaller forests have significant ecological value and should also be protected, large, intact forests are ecologically more effective than many smaller isolated forest patches at supporting critical ecosystem functions. There is a rich literature on forest fragmentation impacts on biodiversity (eg., Fahrig 2003). The forest-interior of large forests experience less impact from “edge effects” including human disturbance, invasive species, high sunlight, and wind-borne drift from herbicides and pesticides (see reviews in Murcia 1995). Larger forests support larger populations of species, which may be less at risk of extinction from “catastrophic” events; they support area-sensitive, forest-interior, wide ranging, edge-avoiding, and rare species (Wilson and MacArthur 1967); they support a greater genetic diversity within species (for eg. Bacles and Jump 2010); allow for movement, migration and range expansions of species due to climate change and support a greater variety of habitats (Hannah 2008; Thomas and Gillingham 2015). Increased shade, air and soil moisture, and healthy soils make larger forests more resilient to climate change impacts and major disturbances such as forest fires and drought; and allow for more carbon sequestration and water storage. Forested land at the watershed scale is associated with higher water quality in streams and aquifers and is the main source of clean drinking water for the majority of the U.S. population (Frimpong et al. 2005; Neary et al. 2009). Many remaining large forests may overlap with intact headwaters regions providing greater protection and buffering of critical water resources (see review in NRC 2002). Finally, it is likely that the larger forests are publicly owned making it easier to assert conservation and management strategies as opposed to privately-owned forests.

Kristi MacDonald

Watershed protections on public forestlands: Implement strong protections of streams, springs, wetlands, vernal pools and steep slopes

Forested land at the watershed scale is associated with higher water quality in streams and aquifers and is the main source of clean drinking water for the majority of the U.S. population (Frimpong et al. 2005; Neary et al. 2009). Forested riparian ecosystems and wetlands provide critical functions of maintaining water quality by filtering nutrients and other contaminants, shading and cooling water temperatures,

providing habitat for aquatic and terrestrial organisms, maintaining channel morphology by stabilizing banks, and slowing and storing floodwater (review in NRC 2002). It would cost billions of dollars a year in infrastructure to replace these ecosystem services.

Requirements must be put in place to protect critical watershed features such as streams, springs, wetlands, vernal pools, aquifers and steep slopes on public forestlands subject to logging, agriculture, and other human disturbances. These requirements include: 1. Mapping of all critical watershed features including permanent and ephemeral habitats such as small headwater streams and vernal pools; 2. Establishing science-based, meaningful minimum buffer sizes to protect watershed features within public forestlands. To provide maximum protection of all ecosystem services and functions we recommend a standard for all public forests of 300-foot buffers for streams and wetlands and a 1000-foot buffer for vernal pool habitat protection; 3. Protecting soils on steep slopes to prevent soil loss, degradation of water quality and silting of streams and wetland areas. There should be no alteration of slopes with a gradient of 10% or greater.

There are several reviews of the literature on the effective riparian buffer width necessary to protect stream health from land use impacts; climate change is necessitating a higher level of concerted planning to mitigate these impacts (Wenger 1999, Army Corps of Engineers 1991, Fischer and Fischenich 2000, Broadmeadow and Nisbet 2004, Sweeney and Newbold 2014). Stream and wetland buffer recommendations depend on targeted parameter, but in general they range from 50ft to 300ft (15-91m); in some cases buffering beyond the entire floodplain is recommended (Wenger 1999), which for the 500-year storm could range up to 250 ft. (76 m) or more. Narrower forest strips act as de facto small forest patches and experience edge effects from adjacent land use (review in Murcia 1995) and for instance, do not reach 100% of natural shade until approximately 250 feet (76 m) from the edge of clearcuts (Brosofske et al. 1997). Vernal pool buffers of 1,000 feet protect and promote biodiversity and address the habitat requirements of vernal pool-breeding wildlife.

Patricia Shanley, PhD

Training New Jersey's Youth to Steward Public Forests

Public forests in New Jersey are key to the health of its people and ecosystems. Yet their ecological integrity is in decline (1). The wellbeing of NJ youth is also in jeopardy. In one decade, suicide rates rose 39% among NJ children (2). Research shows that time in nature, and meaningful activity, boost mental health (3).

Research also shows that forests are our best defense against the twin crises facing our planet - climate change and species extinction (4). Education, however, has become globalized and screen-based, reducing direct exposure to local ecosystems and leading to an "extinction of experience" (5). Youth graduate without the ability to identify common trees. Although NJ is distinguished as the first state to mandate a climate curriculum, true understanding of climate change, biodiversity loss, and invasive species require direct experience in forests (6).

Globally, invasive species are a major cause of species extinction and forest degradation (7). In NJ, at a landscape scale, forests require sustained effort to reduce invasives. At a societal scale, youth urgently require meaningful activity. Although seemingly insurmountable, cost-effective solutions to these two problems are intertwined. Youth can learn both the ecological and public health risks of invasive species (8) and become empowered to eradicate them with their own hands, thereby transforming forests into

habitats of native species, while also transforming themselves. Physical work in schoolyards, parks, and forests bestow a sense of accomplishment, instilling forest knowledge and community spirit.

This proposal aims to improve the health of NJ's forests and to promote resilience among NJ youth. Planned activities include:

- Collaborating Partners (NGOs, Land Trusts, Schools, and State Agencies) will jointly design and implement a state-wide, forest and park youth stewardship service.
- Invasive Species Strike Forces will be strengthened and expanded to create a youth training network, increasing volunteer ecosystem restoration in public parks and forests.
- Educators and science standards experts will complement the state CC curriculum with experiential, outdoor/forest-based K-12 learning. Youth will learn compelling natural history and cultural uses of invasives and natives.
- A pilot program in public schools will train 40 HS students to visit 200 K-12 classrooms reaching 5,000 students to improve ecosystem health and reduce invasives in schoolyards, public parks, and forests.
- Collaborating partners will study the feasibility of reviving the Youth Conservation Corps (YCC) on a statewide level.

Richard Isaac

Deer in Deep Forest

Proposal: Do a study of deer in deep forests and the causes of their deaths within them to determine if deep forest ecological health can be significantly increased by augmenting culling of fawns by increasing the number of natural predators (bears, eastern coyotes, and/or bobcats), increasing hunting limits on adult deer, and/or other techniques.

According to the Rutgers HMF Deer Density Final Report (attached), high deer densities can lead to intolerable levels of damage to native ecosystems. "Forest ecosystems suffer tremendously from deer over-browsing. Impacts to the forest understory start becoming harmful when population densities surpass twenty deer per square mile, impeding forest regeneration (Drake et al. 2002). Many of New Jersey's forests are likely over-browsed and, in many areas, it is severe (Baiser et al 2008). Kelly (2019), noted impacts from increased densities of white-tailed deer of concern to forest managers in northern New Jersey that included declines in seedlings, saplings, trees, herbs and shrubs and a shift from mostly native to exotic species." (p. 10).

Insight into the effects of deer browsing can be gained by examining long-term changes in diversity and the pattern of species abundance. (Direct and Indirect Effects of White-tailed Deer in Forest Ecosystems, p. 169, attached.)

A study by the U.S. Forest Service concluded that coyotes help manage deer population in the Southeast U.S. (Study is attached.) The increased killing of fawns by bear, eastern coyote, and/or bobcats may be able to complement hunters focusing more on full grown deer.

As increasing the number of bears, eastern coyotes, and/or bobcats may be able to increase deep forest ecological health where there are very high deer densities, it is proposed that a study be conducted in

deep forest to see if restricting the hunting of any of those predators, increasing hunting limits on adult deer, and/or other techniques will increase deep forest ecological health by limiting the deer population.

Sandra Chen

Train Municipal Fire Personnel as Prescribed Burn Professionals

Prescribed burns can be used both a wildfire prevention technique and an ecological method of invasive species control (<https://www.nj.gov/dep/parksandforests/fire/program/aboutrx.html>). In New Jersey, it seems that the capacity to carry out such burns each year is not sufficient to meet the need.

A typical goal of New Jersey State Forest Fire Service typically is to conduct prescribed burns on 25,000 acres per year (https://www.nj.gov/dep/newsrel/2022/22_0004.htm). But in 2021, for example, the Forest Fire Service completed prescribed burns on 11,796 acres of state-owned lands, 4,915 acres of other government-owned land and 1,225 acres of privately owned property, for a total of 17,936 acres—a total short of the goal.

One constraint on prescribed burns are the mandated weather and the other pre-conditions that must be met for prescribed burns to be authorized to occur on a given day. Only about days per year satisfy the pre-conditions. A further limit on how many prescribed burns can be conducted is the fact that there are only so many trained burn professionals with the skills necessary to carry out and complete a burn safely.

In 2018 New Jersey enacted the “Prescribed Burn Act”

(https://www.state.nj.us/dep/parksandforests/fire/docs/107_Prescribed-Burn-Act.pdf). This Act calls for the State Forest Fire Service to “develop and administer a program for prescribed burning on public and private lands under which the department may authorize a person to conduct a prescribed burn pursuant to a prescribed burn plan approved by the department.” While authorized in law, such training has yet to be offered. The resources necessary to implement this prescribed burn training program should be allocated to the State Forest Fire Service so that the cadre of trained and qualified burn professionals can be expanded.

Any municipality, particularly those with forested parklands, should be able to ensure that members of its local fire service can qualify as prescribed burn professionals. Qualified burn professionals are a key resource for ecological management of forest lands. If members of local fire departments are given the opportunity to qualify, they will be able to offer support to their local government and the ecological management of their forest lands.

Sandra Chen

Ban the Sale of Invasive Species

To protect woodlands throughout the state, New Jersey should enact a ban on the sale or import of exotic species that are known to be detrimental to woodland ecosystems.

Invasive species are a daunting problem for New Jersey forest managers. The threat posed by invasive species has been studied (1). Control is difficult and expensive. Prevention of their introduction and spread has been found to be a more cost-effective approach. but to date no law has been passed.

However, in March, 2020, a bill governing sale of invasive species was introduced into the Senate and House: S2186/A3677 (2). This is good, and it is to be hoped that the bill, or some version of it, continues on forward toward enactment. The bill is to be commended for requiring the development and dissemination of education materials to help the public understand and appreciate the reasons why controlling these species is important.

Recently Delaware passed an invasive species law, which went into effect on July 1 (3). Delaware's initiative offers a model worthy of consideration. The New Jersey bill and the Delaware law are similar, but not the same. The New Jersey bill proposes control of 28 species, while Delaware's initial list addresses 37 species or sub-species. Twenty-three of the species listed in Delaware's law are not included in the New Jersey bill. Fourteen of the species listed in the New Jersey bill are not included in the Delaware law. Only 14 of the two states' listed species are the same.

Research has shown that control of invasive plants is most effective when conducted consistently across jurisdictional boundaries (4), (5). Coordination with Delaware could be a first step in building a regionally consistent approach. Other states in the region may be interested in developing a regional approach as well. Already Pennsylvania and Vermont have "noxious weeds" laws for the protection of their agriculture and local ecosystems (6). And New York regulates certain species it has determined to be invasive (7).

In any case, continuing to allow the sale or import of plants which are well-documented to be invasive in New Jersey and which woodland managers must expend scarce resources, year-after-year, to attempt to control is simply ecologically counterproductive.

Emile DeVito

Protection of critical natural resource areas via establishment of a new reserve system.

Outside of the NJ Pine Barrens ecosystem, there are unique forested habitats that should be designated with a new type of natural reserve status, one that prohibits road creation and timber harvests unless authorized by the New Jersey Natural Areas Council to address an extreme ecological threat or disaster. State Natural Areas are the only public lands now protected from logging or any form of recreational development. Far more areas need similar elevated protection.

Currently most NJ forests lack sufficient "advanced regeneration" of a diverse set of seedlings and saplings due to overabundant deer. Disturbances of any type (natural and man-made) result in colonization by ruderal native or invasive alien species and eventually a severe loss of species diversity of plants (Kelly ref). Even well-intended forestry operations are disturbances that often set off a chain of events that eventually result in degradation of biodiversity due to deer and alien species impacts. These risks are unacceptable in NJ's highest quality forests.

What follows is a proposed list of public forest areas (outside of the Pine Barrens ecosystem), either already mapped, or to be mapped based on new biological surveys which must be conducted, to be designated for elevated protection to properly protect critical natural resources and ecological processes from being degraded:

- All future designated forested State Natural Areas and additional Natural Heritage Priority Sites as biological surveys warrant,
- Natural Heritage Priority (NHP) sites already acquired as public land (mapped on Conservation Blueprint <https://www.njmap2.com/>)

- Forested lands where the soil horizons have never been disrupted by past agriculture. These lands can be identified by the CC Vermuele forest maps from the late 1800s, 1930 aerial photos, and ground-truthing. They have been shown (DeVito and VanClef ref) to contain significantly greater Floristic Quality Index values than immediately adjacent late successional forests on post-agricultural soils.
- Upland forests whose canopies are dominated by maturing trees over 100 years old, as current research shows that the best way to sequester carbon on these sites is to allow them mature. (Moomaw ref).

Note there is overlap between these 4 categories; forested lands never used for past agriculture that disrupted soil during the 17th to 19th centuries still contain the most unique and vulnerable natural resources. This proposal does not include the Pine Barrens ecosystem nor the plentiful tracts of post-agricultural forest on public land.

Jean Montgomerie

Address Climate Change AND Endangered Species Protection by Reviving and Empowering the New Jersey Natural Lands System and Natural Lands Council

Whereas:

The State Natural Areas System was created to protect natural and ecological resources while still allowing public use. There are 41,000 existing acres of State owned, Designated Natural Areas; of which 40,000 acres are forested.

Tree Harvesting from Natural Areas SOLELY FOR THE PURPOSE OF COMPLETING A FOREST MANAGEMENT OBJECTIVE, is permitted in Natural Areas. However, Ecological Reserves are generally NOT subject to habitat management cutting, while Conservation Preserves allow habitat management to preserve rare plant and animal species.

The State Natural Areas Council and the DEP Office of Natural Lands Management governs the Natural Areas. Natural Areas are administered and Enforced by Parks and Forestry and the State Park Police if on State Forest and State Park lands OR by Fish Game and Wildlife and Conservation Officers if on State Wildlife Management Areas.

New State lands have not been Designated or added to the State Natural Areas for over 20 years (2022). The seven member Natural Areas Council is appointed by the Governor and two seats have been vacant for many years. Reappointments to the Council have lagged past expiration for years.

It is proposed that :

The Governor appoint and fill all vacant seats on the Natural Areas Council immediately.

Reappointments shall be completed in the year following Expiration.

The Government Shall expedite and adopt at least 1,000 acres ANNUALLY to the Natural Areas System AS ECOLOGICAL RESERVES to fight climate change, support Carbon Sequestration, and provide Endangered Species Habitat, by these bioreserves. Priority shall be given to old-growth forests.

Doug Vornlocker

Wildfire Support

The New Jersey Recreation and Parks Association (NJRPA) would like to propose a project to support and enhance the great work currently being conducted by the New Jersey Forest Fire Service. As both science and the public become more supportive of the use of fire in, and around, our forests, there will be a greater demand for the wildland fire resources of New Jersey. The NJRPA is requesting that a dedicated source of funding be identified to support the development of local wildfire planners and technicians to work under the oversight of the State authority. Having local understanding and proficiency will allow for a larger number of, and possibly smaller – more frequent, burns on public lands. Many variables, including a lack of understanding the benefits of fire, State-level staffing

deficiencies, frequency of suitable weather conditions, and limited seasonal availability of certain properties are challenges that could be addressed if this project was approved. This funding would be used to support those local governments interested in items such as:

- the development of prescribed burn applications, burn plans, and prescribed burn related incident action plans (IAPs)
- education to local communities including the public, local fire agencies and fire officials
- training local emergency response agencies and county and municipal employees (for example, park maintenance and park ranger departments) in wildland firefighting
- the purchase of necessary personal protective equipment and other related items to provide to those executing burn plans
- using fire to reduce the amount of fuel and chemical, and number of person-hours, currently being used to manage local forested landscapes
- planning for and monitoring the ecological effects of prescribed burns
- research that assists in identifying the usefulness of fire on both native and invasive species (including the effectiveness of fire on different life-stages) on related (local) spatial scales
- guiding managers towards a set of local best practices related to use of fire as a tool in our communities - to protect and restore our environment and increase public safety
- strengthening public sector relationships and assisting reforestation efforts with the many nonprofit conservation and stewardship organizations throughout NJ
- Assist communities in creation and implementation of Community Wildfire Protection Plans (CWPP) to increase public awareness of potential fire threat

Kristen Meistrell

Potential mechanisms to increase prescribed burning (Rxb) within the NJFFS to increase capacity for carbon defense and ecosystem resiliency in disturbance dependent forests

Among the barriers for using Rxb more widely are weather and seasonality constraints, and the limited number of people employed by the NJFFS who are qualified through experience and proper credentialing to conduct burns within the narrow timeframe each year when conditions are conducive to safely employ Rxb. Potential opportunities to increase capacity at the DEP could include:

1. Restructuring section-specific warden assignments in favor of having staff work more fluidly throughout the state to take advantage of seasonal Rxb opportunities from north to south. This would allow for a greater exchange of expertise and experience among personnel.
2. Create one or more mobile sections or “modules” to support Rxb operations in sections where assigned wardens are out on leave during the burn season, or wherever assistance is needed.
3. Cross-train staff from the Forest Service to support Forest Fire Service and vice-versa. This would allow more qualified people to be available during the relatively short Rxb burn season, and section wardens could support the Forest Service functions (including state lands planning) throughout the remainder of the year. Other states like Missouri seem to use this model effectively.
4. Increase training opportunities within the DEP for personnel who might be exceptionally well trained at fire suppression but possibly less experienced using Rxb as a silvicultural tool, which appears to be an issue in Division A. This could be accomplished by establishing an Rxb co-operative among other state fire agencies, which would not only provide interagency training, but could add capacity for all involved states as combined crews fluctuate along the eastern seaboard to operate within seasonal burn

windows. Interagency training would also incentivize more NWCG credentialing among DEP staff working out of state. In turn, that would enable more NWCG training opportunities for non-professionals in NJ who are interested in becoming certified under the guidance of a NWCG certified DEP staff person (NWCG training opportunities in NJ currently seem to be lacking).

Kristen Meistrell

The need to increase the use of prescribed fire (Rxb) for ecosystem resilience and carbon defense in the face of climate change

Including public and private lands, Rxb is currently employed on roughly 20,000 of the 2 million acres of forest in NJ annually (McLaughlin 2022), which is equal to approximately 1% of the total forest cover. However, within this figure there are certain areas of the Pinelands that are burned repeatedly every few years for public safety purposes, making the percentage of new forestland being affected by Rxb each year significantly less than 1%.

As pine and oak stand densities continue to increase in the absence of fire from processes such as mesophication (Nowacki 2008), the structural changes will make them increasingly vulnerable to competition stress and other climate related stress from warmer temperatures and erratic precipitation patterns, including periods of drought (USDA Tree Atlas). This will be exacerbated by the strong reduction in water availability due to increased evapotranspiration as tree density increases (Hoek van Dijke 2022, Isaacson 2022), which will make forests even more susceptible to large-scale losses of stored carbon as widespread mortality occurs, like in the 2022 Wharton fire or when 431,000 acres of oaks were defoliated in 1990 (NJ Dept. of Agriculture, retrieved 2022).

Treating less than 1% of the state's forests annually with Rxb is insufficient to sustain the roughly 1.5 million acres that are dependent on disturbances like fire for system stability or regeneration. The NJDEP needs to explore mechanisms to increase the number of acres burned each year using Rxb as a carbon defense strategy.

Peer reviewed references:

Nowacki, Gregory J.; Abrams, Marc D. 2008. The demise of fire and "mesophication" of forests in the eastern United States. *BioScience*. 58(2): 123-138.

Other references:

USDA Climate Change Tree Atlas - <https://www.fs.usda.gov/ccrc/tool/climate-change-tree-atlas>

USDA Forest Inventory and Analysis (FIA) National Program - <https://www.fia.fs.fed.us/tools-data/>

NJ Dept Ag --

<https://www.nj.gov/agriculture/divisions/pi/prog/gmquestions.html#:~:text=A%3A%20The%20gypsy%20moth%2C%20in,800%2C000%20acres%20of%20forest%20land.>

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Kristen Meistrell

Potential mechanisms to increase the training of non-DEP staff in prescribed burning (Rxb) to increase capacity for carbon defense and ecosystem resiliency in disturbance dependent forests

NJ has 29 designated fire sections, each having a full-time employee who is charged with overseeing prescribed burning in that section (i.e., a Section Warden). Other than Section Wardens, there are few qualified private individuals in the state who are appropriately qualified and have been permitted to conduct Rxb without NJDEP oversight. Having more qualified people (e.g., NWCG certified) to oversee Rxb operations should help to improve capacity, which is essential for defending existing carbon stocks and sustaining disturbance dependent ecosystems for a carbon benefit in NJ. Some potential options include:

1. Establish a NJ Rxb Training Center to make planned experiential learning more accessible within the state. This could be done in cooperation with the federal govt., other states, county govt., ENGOS, volunteer firefighting departments, and other partners like the North Atlantic Fire Science Exchange. The training center could coordinate a mobile Rxb team/module comprised of staff from partner organizations to support burning throughout the state.
2. Increase opportunities for partners and other volunteers to gain Rxb experience by making it easier to participate in DEP organized Rxb activities happening throughout the state. This could be done by establishing an online Rxb calendar on the DEP website where individuals who have basic wildland firefighter training (credentials provided to the NJFFS) can review locations where Rxb is planned each day and enroll to voluntarily participate on that project instead of waiting to be called for assistance within their designated section. In theory, the calendar could be updated daily so that participation could also be done on relatively short notice based on a person's availability.

Daniel J. Bernier

Facilitating Venison Donation through Funding and Recruitment of Butchers

Forest health is greatly impaired by a proliferation of white-tailed deer. Culling by licensed sportsmen has not been able to keep pace with deer numbers, especially as the number of licensed hunters has been on the decline. Since 1994, land managers in New Jersey have had the ability to utilize alternative deer control measures through the Community Based Deer Management Program (CBDMP)(1).

As a condition of the CBDMP, the permittee is required to provide for the donation of venison to a community food bank (1). Generally, the permittee pays to a butcher the customary cost (currently \$90/deer) of processing the deer harvested by that program (2).

That cost can be a considerable piece of the budget of an agency's deer management program. In 2019, the Essex County Deer Management Program harvested 200 deer. The total cost of butchering (\$75 per deer at that time) amounted to \$15,000 (3).

Individual hunters can participate in the Hunters Helping the Hungry Program by taking a harvested deer to a participating butcher. The venison is given to a food bank, and the butcher is reimbursed by the Hunters Helping the Hungry Program. However, the funding source for the HHH Program is unstable, and mostly reliant on donations (4).

After the funding is depleted, a hunter must pay the cost of butchering themselves, even though they are donating the venison (4). After having filled his or her freezer with venison from deer harvested early in

the season, an avid hunter might continue to hunt the rest of the season if they knew they had an outlet for the carcass - but not if they have to pay \$90 for each surplus deer. This results in less deer being culled statewide than might otherwise be.

A stable source of funding for the Hunters Helping the Hungry Program needs to be established to encourage greater hunter participation throughout the hunting seasons. Funding assistance to eligible CBDMP applicants might encourage more public agencies to start or maintain a hunting program

All processing of venison for charitable purposes must be conducted by butchers that are certified by the New Jersey Department of Health (5). Currently only 8 butchers are certified, and 4 are clustered in Hunterdon County. The NJ Dept. of Health and/or the NJ Division of Fish and Wildlife need to encourage other New Jersey butchers who process deer to seek certification and participate in the HHH Program. A stable source of funding might provide a means for incentivizing those butchers.

Emile DeVito

Funding for NJ Dep of Ag Allampi Lab for Biological Control

Legislation should increase funding for the NJ Dep of Ag Phillip Allampi Beneficial Insect Rearing Laboratory, to increase collaboration w/ nearby states and institutions to hasten development of biological control agents for alien invasive species that threaten New Jersey forests.

A flood of invasive species threaten virtually every forest ecosystem in New Jersey. Only core areas of the New Jersey Pine Barrens are somewhat free of aggressive alien species due to high soil acidity. (NJ Strategic Mgmt Plan for Invasive Species) Elsewhere, floodplain forests are overrun with Bohemian knotweed and Lesser Celandine, Emerald ash borer is wiping out ash trees, native plants cannot establish beneath blankets of Japanese stiltgrass in many forest types, and alien vines and shrubs young forests. The list seems endless; our natural heritage is being converted to alien weeds. More than 1/3 of NJ's 2500 native plant species are at risk. Few native insects and pollinators feed on alien weeds; a broken food web cascades upward to cause declines in forest amphibians and birds. For most alien species there is no hope of manual control, chemical control is expensive and dangerous. To restore a food web rich in native plants and insects we need biological control agents that attack only the alien species. This work requires surveying alien species in their countries of origin, and years of testing to determine if insects or pathogens that control the alien species can be released safely. Federal agencies and academic institutions do much research, but NJ's excellent Allampi Lab must become a larger cog in this battle on issues most prominent in NJ and the mid-Atlantic.

<https://www.nj.gov/agriculture/divisions/pi/prog/buglab/what-is-biological-control/> Biological control will yield incalculable benefits restoring functionality to critical ecosystems (e.g. restoration of floodplain forests via control of Bohemian (Japanese) knotweed by the tiny, sap-sucking psyllid insect *Aphalara itadori*). The Allampi lab is rearing colonies for release into test sites; with sufficient funding, floodplains of especially urban rivers throughout New Jersey could be restored. Knotweed stems rot and clog river channels, collect sediment and exacerbate urban flooding. Trees cannot colonize infested habitats, Knotweed makes shorelines inaccessible for recreation, degrading urban parklands. Significant increased investment in the Philip Allampi Laboratory is essential for our public lands.

Emile DeVito

Legislation to Re-establish and Fund the NJ Invasive Species Council

Legislation should re-establish the New Jersey Invasive Species Council on a permanent basis, and to provide it with stable source funding, so that it may revise and carry out the objectives of the New Jersey Strategic Management Plan for Invasive Species, commensurate with efforts by nearby northeastern states to combat the immense costs incurred as a result of infestations of alien, invasive species of plants, animals, and pathogens.

During the first decade of this century, under Governor's Executive Order #97, the New Jersey Department of Environmental Protection assembled a diverse group of stakeholders (the Invasive Species Council) to develop a Strategic Management Plan for Invasive Species. The plan was finalized in 2009, but the Invasive Species Council was almost immediately dissolved and no funding was ever assembled. Since then (other than efforts by the NJ Dept. of Agriculture Phillip Allampi Beneficial Insect Lab and the non-profit NJ Invasive Species Strike Team), the State of New Jersey has essentially ignored the Strategic Management Plan. 15 years ago, damage to NJ agriculture alone was estimated at \$290 million! The emergence of Emerald Ash Borer, Spotted Lantern Fly, Snakehead Fish, and many other species of plants, animals, and pathogens since that time have no doubt compounded the yearly costs to New Jerseyans while wreaking additional havoc on our farms, forests, wetlands, and waterways. The climate crisis is creating unstable conditions in our ecosystems, especially our forests, which will allow for newly emerging invasive species to take hold.

Many surrounding northeastern states have active invasive species management programs that go far beyond solving existing agricultural problems. They seek out newly emerging invasive species before they spread and gain a permanent foothold, they spend considerable effort monitoring sites where unwanted species introductions are likely, and they collaborate with non-profits and neighboring states to try to stop damaging invasive species from gaining a foothold. New Jersey needs a permanent Invasive Species Council and sufficient staff at both the Departments of Agriculture and Environmental Protection to confront the highest priority issues as determined by the Council.

Emile DeVito

Legislation to instruct the NJ Div of F&W to work w/ partners to aggressively pursue reduction of deer density on public forest tracts greater than 200 acres.

Legislation to instruct the NJ Div of F&W to work w/ with state agencies, local govts, tax-exempt landowners, and woodland-assessed landowners to aggressively pursue reduction of the deer density on publicly-accessible contiguous open space forest tracts greater than 200 acres to a January density of 7 deer per square mile (one deer per 90 acres).

The deer population explosion during the late 20th century has been New Jersey's most significant cause of forest degradation. Deer have virtually eliminated successful reproduction and re-establishment of most species of native forest trees, shrubs, and herbaceous plants in the vast majority of New Jersey's forests (Kelly, 2019), except certain pine and maple swamps in the Pine Barrens and a few remote mountainous tracts. By removing natives, deer have assisted invasion of aggressive alien plants into natural forest gaps in otherwise healthy forests, onto almost all post-agricultural soils, and forest stands disturbed by insect outbreaks, fires, and many forestry projects.

In nearly all of New Jersey, deer are at least 10x more abundant than forests can tolerate. A healthy forest containing a diverse complement of native herbaceous plants, shrubs, tree seedlings and saplings, understory tree species, and a largely intact canopy can withstand 15 to twenty deer per square mile (Horsely et al. 2003; Russell et al. 2019), but a forest degraded by deer herbivory (the vast majority of deciduous forests in NJ) cannot recover unless deer density is dropped and held well below 10 deer per square mile for many years (Almendinger et al. 2020).

Heavily deer-damaged forests have been proven to recover when deer are significantly reduced, but continuing to manage deer at high densities will significantly undermine all attempts to manage forests for biodiversity conservation or carbon sequestration. If deer are not reduced well below 10 deer per square mile for at least 20 years, as canopies open from disturbances, our public forests will continue degrading, becoming overwhelmed by alien weeds. Not only will food webs, biodiversity, natural resource, and open space values continue to decline, but public ecosystem functions – societal benefits such as carbon storage, water and air purification, aquifer recharge, and flood control will all decline precipitously.

On open space forest tracts of 200 acres or more, access to deer and tract size are sufficient to develop deer reduction strategies that will restore the future forest.

Steven Mitchell

Proposal To Reduce The White-Tailed Deer To Manageable Habitat Levels

The most imminent environmental problem facing NJ is the overabundance of the white-tailed deer (*Odocoileus virginianus*) pop., and as the dominant ecological animal in NJ, its trophic effects on the forested and edge ecosystems of NJ. The deer pop. of the US and NJ was driven to near extinction through overhunting, animal predation, habitat loss and encroachment by an expanding human pop. in the 1800s. Efforts began in the late 1800s to recover the deer pop., when the US Biological Survey of 1890, est. only 300,000 deer remained in the US. This culminated in passage by Congress of the Lacey Act in 1900 forbidding interstate shipments of illegally killed game. (Kenyon 2020, p.2) Since then deer recovery efforts have led to resurgence of the deer pop. in every state. By allowing deer to increase in NJ with no predators to contain their growth, we've engendered their reproduction and created a trophic cascade of animal and plant community changes, as the result of deer browse, that have ensconced deer as the top-down control species of the forest. In 1998, NJ's deer pop. was est. at an average density of 38 deer/mi², numbering 175,00-200,000. (Van Clef 2004, p. 5-6). These est. are nearly 25 years old. In 1972, it's est. NJ had a deer pop. of approx. 10 deer/mi², about the same number as historical pop.. 10 deer/mi² is required for deer-preferred browse vegetation and tree regeneration to occur. (Kelly 2017). Recent est. show a substantial increase in deer pop. since. The 2019 NJ Farm Survey, a sampling of deer in 7 study areas located in portions of 10 counties, showed a range of 103 deer/mi² and 111 deer/mi² in this survey of agriculturally-impacted habitats. (5-6) NJ needs to reclaim the design and biodiversity of its forest lands from the deer.

This proposal authorizes the NJ legislature to identify deer overpop. as the primary threat to ecol. health of NJ's public forests and create a state task force to address the resultant problems, in conjunction with NJ DEP. The task force would develop a strategy for the 11 ecologically-unique state forests, incorporating substantial deer reduction targets aimed at an average of 10 deer/mi², with an emphasis on preferred edge habitat regeneration favored by white-tailed deer, and biodiversity reclamation. A 4-prong strategy to reduce the deer pop. would be utilized.

- 1) Develop a commercial venison industry for state of NJ
 - a. Federal/state approval/regulation
 - b. Create commercial retail market
- 2) Culling
 - a. Use of professional sharpshooters
 - b. Ecological deer management
 - c. Recreational hunting (incentives)

200x

- 3) Use of immunocontraceptive vaccines
 - a. Requires state/federal approval
- 4) Deer fencing

Steven Mitchell

Proposal to Support the Creation of an Invasive Species Task Force for the State of NJ by the NJ Legislature (Current Bill A2629)

This proposal would support legislation currently submitted in the NJ Assembly (Bill A2629), sponsored by Ronald Dancer of the NJ Assembly that creates an "Invasive Species Task Force" for the state of New Jersey, consisting of 5 members, led by 2 co-chairs, the Commission of Environmental Protection and the Secretary of Agriculture.

The legislation is summarized below:

Part I – the composition of the 5-member task force

Part 2 – The Invasive Species Task Force shall do the following:

1. Study most efficient means of controlling invasive species.
2. Develop uniform policies and a coordinated response to the threat of invasive species to agriculture and NJ ecological, historical, cultural and infrastructure resources.
3. Develop plan to prevent new invasive species from entering NJ and limit the spread of invasive species already present in NJ
4. Develop plan to control current infestations.
5. Develop plan to restore ecosystems to their natural condition and repair the damage caused by invasives.
6. Identify regulatory and statutory obstacles at federal, state and local levels impeding development or implementation of prevention, control and restoration efforts.
7. Evaluate 2009 NJ Strategic Management Plan for Invasive Species prepared by NJ Invasive Species Council, pursuant to 2004 Executive Order No. 97.
8. Develop alternatives, in addition to 2009 Strategic Management Plan for Invasive Species plan recommendation to control entry and spread of current and new invasive species
9. Prepare comprehensive invasive species management plan for the state of NJ including estimate of necessary resources for implementation.
10. Prepare recommendations for legislative action necessary to implement the report.
11. Submit report of findings, plans and recommendations to Governor within one year after task force is organized, and to the state legislature.

This proposal also recommends amending the Bill A2629 to include appropriate public and community input to the formation of this statewide plan through public hearings and correspondence, and to adjust deadlines accordingly.

202x

Appendix E-4

Proposals that were accepted and discussed

Proposals that were submitted and accepted by the co-chairs as aligning with the criteria for acceptance. At least three of four co-chairs agree that proposal met criteria. These proposals were discussed by workgroup participants, but consensus could not be reached due to discussions veering toward the topic of tree cutting and wood removal. There were 15 proposals in this category (one was submitted and revised).

Narratives were limited to 2500 characters. Proposal sponsors were invited to also submit references, which are not included here due to space limitations but are available using the sponsor's citation(s) when provided. Footnotes in the proposals indicate a reference to an article, file, memo, or other document. Note that references submitted ranged from unpublished opinions, magazine and news articles, webinars, and journal articles (some peer-reviewed and some not peer reviewed).

Douglas A Meckel

New Jersey Wildlands and Old Forest Protection act

Set aside most, if not all, of the remaining old and older growth forests as ecological reserves to allow them to reach their potential. Modify existing plans on public lands to prevent Highgrading.

Note as everyone is aware New Jersey is the most densely populated state in the US. Expecting New Jersey to be a self-sufficient wood producer (as some have suggested) would be as reasonable as asking North Dakota to make their own pharmaceuticals. The best use for our forests is as forests for the use of our citizens for recreation, carbon sinks, and an ark for various species to preserve biodiversity, not as a wood lot or clear cutting to create edge habitat to improve deer or warbler habitat. We have plenty of edge habitat.

"Today, <20% of the world's forests remain intact (i.e., largely free from logging and other forms of extraction and development). Intact forests are largely tropical forests or boreal forests in Canada and Russia (Watson et al., 2018). In the U.S.—a global pioneer in national parks and wildlife preserves—the percentage of intact forest in the contiguous 48 states is only an estimated 6–7% of total forest area (Oswalt et al., 2014), with a higher proportion in the West and a lower proportion in the East. " Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good WR Moomaw, SA Masino, EK Faison - Frontiers in Forests and Global ..., 2019 - frontiersin.org (see IntactForestPDF)

As you can see from the above, we have precious little land that has not been highly modified. So as a wise man once said "when in a hole stop digging."

"Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement,

water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty.” (ibid) (see IntactForest PDF)

Additionally please see PDF’s forest & forest1 for more information on the need to keep forests intact if we are to meet our climate goal.

The advantage of the above approach is it requires little in the way of new funds and may in fact generate income if the state decides to use some of the carbon that will be captured for sale on the emerging carbon markets which currently lack verifiable projects that can be trusted. Additionally if the State decides to measure the carbon captured, it will provide some employment for the Foresters who would have a new mission.

Douglas Meckel

New Jersey Wildlands & Older Forest Protection Act (updated)

Set aside most, if not all, of the remaining older growth forests (on public lands) as ecological reserves to allow them to reach their potential (see Older Forest PDF for definition). Allow only non-motorized recreation in the most sensitive areas. If trees need to be cut for public safety issues (example ash borer damage) wood to be left in area to provide habit.

New Jersey is the most densely populated state in the US. Expecting New Jersey to be a self-sufficient wood producer (as some have suggested) would be as reasonable as asking North Dakota to make its own pharmaceuticals. The best use for our public forests is as forests for the use of our citizens for recreation, carbon sinks, and an ark for various species to preserve biodiversity, not as a wood lot or for clear cutting to create edge habitat to improve deer or warbler habitat. We have plenty of edge habitat.

“Today, <20% of the world’s forests remain intact (i.e., largely free from logging and other forms of extraction and development). Intact forests are largely tropical forests or boreal forests in Canada and Russia (Watson et al., 2018). In the U.S.—a global pioneer in national parks and wildlife preserves—the percentage of intact forest in the contiguous 48 states is only an estimated 6–7% of total forest area (Oswalt et al., 2014), with a higher proportion in the West and a lower proportion in the East.”
Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good WR Moomaw, SA Masino, EK Faison - (see IntactForestPDF)

As you can see from the above, we have precious little land that has not been highly modified. So as a wise man once said “when in a hole stop digging.”

“Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty.” (ibid) (see IntactForest PDF)

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State decides to measure the carbon captured, it may provide a new source of employment for Foresters.

Greg Gorman

Support Preservation of Mature Tree Stands

NJ policy and legislation should support the preservation of stands of mature trees. Mature trees should be those above say 15" in circumference. It is NOT in the public interest to create incentives for harvesting mature trees and releasing the sequestered CO₂ they contain. Logging without restraint will make Climate Change worse. Some people think that thinning is a good idea because they assume that thinning leaves some habitat in place.

Some people also think that thinning prevents forest fires because it widens the space between trees and involves cleaning up the forest floor. To the contrary, the mature forest canopy prevents fires by keeping the forest floor cool and damp. Once the mature canopy is gone through thinning, the forest is much more prone to fire. Many claim also that forest fires release more sequestered CO₂ than does thinning. However, the reality is quite different according to the work of the John Muir Project, because thinning is much more comprehensive than people realize.

Thinning unlocks carbon sequestered in our forests. Logging also destroys habitat that is badly needed for the survival of many species. Habitat recovery is very difficult with thinning since thinning leaves very little original habitat. While thinning, a large amount of the wood removed is burned elsewhere as waste, which releases greenhouse gases. At the same time, study shows that the typical forest fire, leaves a great deal of the tree material behind – as burned trunks, etc. According to the John Muir project, CO₂ emissions from thinning are about three times higher than wildfire alone because thinning removes more of a mature tree than does fire. (See The John Muir Project Reports Climate.Gorman.Stewardship7 Rim Fire JMP fact sheet and Climate.Gorman.Stewardship8 Forest & Fire Science Synthesis).

Also, the John Muir Project points out that emissions are just part of the story when it comes to logging and climate change. A consistent conclusion from many scientific studies approaching the issue from many directions is that heavily logged landscapes are far less resilient to the effects of climate change. They are more susceptible to wildfires, flooding, insects, disease, wind damage, heat waves, landslides, and harmful algae blooms. These stressors are already on the rise due to climate change – logging makes the effects so much worse. The work of the John Muir Project provides resources to support this line of research (<https://johnmuirproject.org/forest-watch/>),"

Jim Lyons

Create a public process to develop a Forest Conservation Plan for each of the State Forests

New Jersey's state forests are owned by all New Jerseyans and should be managed to achieve conditions that reflect the views, values, and desired outcomes of the public. Each state forest should be managed in accordance with a Forest Conservation Plan.

To determine what residents desire of their forests, a process should be established that ensures public input, oversight, and participation in the management of the public's forests consistent with existing

law, agreed upon management objectives, and based on sound science. To achieve this, a forest planning process should be initiated to develop plans for the conservation and stewardship of each of the 11 state forests covering one-quarter of a million acres of New Jersey.

[Please, see the attached document for remaining proposal]"

Ken Dolsky

Maximize Carbon (C) Storage and Sequestration (S&S) by Banning Harvesting Trees on Public Lands

NJ climate policy requires maximization of C S&S on public forestland to support the GWRA (increase sequestration 33% by 2050). GWRA 80x50 Report: "This optimistic projection, however, would require the use of all currently available open space for sequestration, requiring a major transition in New Jersey's current land use laws and practices." (p. xix). Maximizing S&S is needed to achieve EO 274 (50% reduction in GHG emissions by 2030 (reduction of 60MMT).

Because older forests store and sequester more C than young forests, this requires a policy of allowing forests to mature and a ban on harvesting or commercial logging.

Peer-reviewed studies support this proposal by demonstrating:

- Older temperate deciduous forests store and sequester more C per unit area than younger forests.
- Young temperate forests are net emitters of C for many years.
- Older forests' rates of growth and C gain increase continuously with tree mass for hundreds of years.
- Aboveground biomass of most US forests will not decline with age. A substantial amount of additional C could be stored in US forests if large second growth tracts were preserved.
- Even considering sequestration of C in wooden buildings, timber harvest results in a net flux of CO₂ into the atmosphere.
- Confusion over the age at which forests sequester the most C is because young trees grow in height faster than old trees and the rate of sequestration in a young forest can be high. However, volume is more important than rate. It is not how fast C deposits are made but how large those deposits are. Young forests are limited in the size of their deposits by their leaf area.
- Conversion of old-growth forests to young invariably reduces C storage, even when structural components in buildings are considered...forests continue to lose mass for three decades after disturbance. Although reintroducing forests to deforested regions will increase C storage, conversion of old-growth forests to younger forests has added and will continue to add C to the atmosphere.
- We find no scientific evidence to support increased logging to store more C in wood products, as a natural climate solution.
- Overall, logging in U.S. forests emits 10 times more C than fire and native insects combined.
- Afforestation and reforestation, while helpful on open land, cannot store or sequester more C than existing forests on a per acre basis and cannot be used to justify harvesting of mature forests.

See source #1 - Carbon sequestration and storage data – young vs old document for expanded narrative and other sources.

Ken Dolsky

Proposal to base forestry GHG decisions only on NJ GHG policies and objective research

NJDEP/F&W forest management carbon storage and sequestration policies and practices shall only be based on minimizing GHG emissions and maximizing carbon storage and sequestration in NJ public forests' total carbon lifecycle, in support of both the NJGWRA objective (80% GHG reduction by 2050) and the EO 274 objective (50% GHG reduction by 2030). Policies shall be based on a combination of peer-reviewed studies and credible non-forestry industry analyses. They shall not be based on "leakage"

from any other states or total US or worldwide carbon emissions. There are no State policies or regulations requiring NJDEP to make decisions on forest carbon based on emissions outside NJ or the effects of NJ actions on emissions outside NJ.

To enforce these decision factors, forestry management must become a regulated activity.

DEP has great latitude on forestry actions because forests are not ""regulated features"" or ""regulated sources"" and sequestration is not a ""regulated activity." Regulating forestry would require DEP to be more rigorous in their definitions and asserted authority.

Current DEP policies support local logging to avoid importation of wood from sources outside NJ based on the premise that the energy required for transportation generates more GHG emissions than from local wood harvesting. Evidence to date shows that wood logged in NJ is being transported for sale out of state. This policy violates state law. Given the need to meet NJ GHG reduction targets and the high level of GHG emissions from harvesting, these policies must be rescinded.

Current DEP policies support logging in NJ based on the resulting storage of carbon in wood products. Studies have consistently shown that logging results in net increases in emissions even when long term storage in wood products is considered. More carbon is lost to the atmosphere than is stored in wood products in the short term. In the long term all products eventually release their carbon. Moreover, wood products have no further sequestration capability.

Policies attempting to justify a reduced lifecycle carbon footprint by comparing NJ hardwoods used as construction timber as being less carbon intensive than cement or steel construction materials produced in NJ, need to be evaluated using peer reviewed science and include harms to the environment from tree cutting. Estimates comparing the carbon benefits of wood products to alternative materials have been found to overestimate the benefit by factors of between 2- and 100-fold by not counting the full life cycle carbon and the shorter durability of wood relative to alternative materials (Harmon, ME, 2019). NJDEP/F&W forest management carbon storage and sequestration policies and practices shall only be based on minimizing GHG emissions and maximizing carbon storage and sequestration in NJ public forests' total carbon lifecycle, in support of both the NJGWRA objective (80% GHG reduction by 2050) and the EO 274 objective (50% GHG reduction by 2030). Policies shall be based on a combination of peer-reviewed studies and credible non-forestry industry analyses. They shall not be based on "leakage" from any other states or total US or worldwide carbon emissions. There are no State policies or regulations requiring NJDEP to make decisions on forest carbon based on emissions outside NJ or the effects of NJ actions on emissions outside NJ.

To enforce these decision factors, forestry management must become a regulated activity.

Ken Dolsky

Ban Thinning of Public Forests (especially forest canopies) as a Purported Tool to Prevent and Lessen the Intensity of Wildfires (with various accommodations in the NJ Pinelands where needed).

NJ climate policy requires maximization of carbon storage and sequestration on public forestland to reduce the harmful effects of climate change and support the GWRA (increase sequestration 33% by 2050) and EO 274 (50% reduction in GHG emissions by 2030). This requires allowing forests to mature and a ban on harvesting or commercial logging.

207x

Studies have shown that logging on a commercial scale (aka commercial thinning) does not reduce the risk of wildfire or the intensity of wildfire and must be banned as a practice to purportedly reduce the probability of catastrophic wildfires in NJ.

Peer-reviewed studies and other reports such as wildfire risk analyses support this proposal by these findings:

- The main driver of catastrophic wildfires in the West is climate change induced severe, 1,000-year drought, a condition not found in NJ
- New Jersey forests, especially in the Northern part of the state have not had a long history of natural wildfires followed by recent years of suppression
- The risk of wildfire, let alone catastrophic wildfire, is very low in Northern NJ and only modest in Southern NJ outside of the Pinelands
- A 2016 review of 1500 fires found that fire severity was higher in areas treated by fuel reductions compared to wilderness and parks where no logging is allowed
- Intensive forest management characterized by young trees and homogenized fuels burn at higher severity
- Thinning reduces the cooling shade of the forest canopy, creating a hotter, drier, and windier microclimate, and leaves "slash debris" made up of the easily combustible tops, branches and needles of previously standing trees. This makes wildfires burn more intensely. Thinning dries out the land and increases fire risk.
- Thinning, including overstory trees, can increase the rate of fire spread by opening up the forest to increased wind velocity and introduce invasive species that increase flammable understory vegetation
- Logging conducted under the guise of "thinning" and "fuel reduction" typically removes mature, fire-resistant trees that are needed for forest resilience and emits about three times more CO2 than wildfire alone
- Prescribed burning in fire dependent landscapes does not require removing larger canopy trees
- Conclusion: Commercial thinning (especially large trees) does not reduce the risk of fire occurrence or fire intensity.

See Research on the Use of Thinning to Protect Against Forest Fires document for expanded narrative and sources.

Ken Dolsky

Proposal to formulate a joint legislative/regulatory/NGO group to investigate sources of funding for ecological restoration including those described below:

Reallocate Green Acres tax money

Increase the portion of GA money used for maintenance. Mercer County did this when they decided there was not much more forest to acquire and they needed more money for maintenance. They passed an ordinance to place an Open Space Tax Referendum on the 2021 ballot. Lisa K. Fritzinger, AICP PP, Assistant Planning Director, Mercer County said this referendum passed with 76% of the vote.

Utilize money from RGGI

NJ has allocated \$15 million, available from New Jersey's participation in the Regional Greenhouse Gas Initiative (RGGI), in new grants for projects that create, restore and enhance natural "carbon sinks," or places sequestering carbon that would otherwise go into the atmosphere. (See Source #1 for more background on RGGI funding).

Natural carbon sinks include forests, agricultural soils, salt marshes, seagrass beds, and urban parks, woodlands and street trees. The RGGI program provides carbon auction proceeds to invest in programs and projects designed to help New Jersey meet its climate, clean energy, and equity goals.

Once we have clearly demonstrated that the best way to enhance natural carbon sinks on forest land is by letting forests mature, then any functions that support this should be candidates for RGGI funding.

USDA money to write FSPs for public lands.

We should redefine these functionally to be ecological restoration plans and only allow accredited ecological managers to write them but try to keep the USDA funding.

Auto Insurance Surcharge for Deer Control

According to State Farm Insurance, there were 30,866 accidents in New Jersey involving deer in 2010. It is proposed that the State mandate an additional annual auto insurance fee of \$1 (or other amount based on annual cost analysis of deer control measures) for every automobile / vehicular insurance policy for every driver on the policy. With over 6.2 million insured drivers in the state, this would provide a substantial resource for the multiple courses of action that may be needed for deer control. This surcharge should be carried for a minimum of 7 years (or until such time as deemed unnecessary). This will benefit drivers by reducing deer related accidents and reduce other costs such as emergency health care.

Leslie Sauer

CLIMATE CHANGE PROPOSAL- Recognizing the urgency of climate change, the State declares proforestation to be the management policy for public forests in order to maximize sequestration and ecological values.

Proforestation is growing forests to reach their full ecological potential for carbon storage in wood and soils in the absence of human interference 1,2,3,4,5. Like reforestation (replacing forests on deforested land) and afforestation (planting new forests) proforestation is one of the methods for removing carbon dioxide from the atmosphere and storing it long term 6,7.

At this point the evidence is incontrovertible that older, more intact forests, sequester and store more carbon than younger forests 8, 9. Carbon sinks are not only the trees themselves but also, and perhaps even more significantly, in mature forest soils and peat. Forests on public lands, that have been protected from harvesting by Green Acres and other entities for 60 years, are just reaching their prime as the most significant contributors to sequestration 10. While newly planted trees take decades or more to contribute to carbon removal, our existing forests are becoming better at sequestration as they age 11. The effects of proforestation are instantaneous.

Proforestation as a policy is allowing natural self pruning to be the primary regulator of forests' growth and maximizes the storage of carbon. When trees fall or are self-pruned that material becomes carbon sequestered in the soil and taken up by vegetation and is sequestered at a far higher rate than a wood product 12. The value of the potentially harvested wood is greater for its sequestration activity than for its value as harvested timber. Wood, whether fallen, wind-blown, jettisoned by negative branching, or charred is vital to the rebuilding forest soils and should be retained on site 13,14.

Proforestation is not about no management at all as it is often characterized by opponents. Claims that without management/harvesting forests will become uniform and decrepit over time are not supported by any data. The 'carbon offense' strategy of cutting forest now to avoid future carbon losses loses

stored carbon and reduces sequestration immediately. It is not a justifiable strategy 15,16. With a policy of proforestation many of our forests need restoration, not harvesting, in order achieve to their full ecological potential. NJ's public forests are more crucial than ever and must be fully protected instead of harvested and monetized 17,18,19. This is the most critical decade to minimize the effects of climate change 20. No other policy would increase sequestration more while fostering r complexity and biodiversity than proforestation.

Leslie Sauer

ECOLOGICAL HEALTH PROPOSAL- Protect and manage forests on public lands to attain their highest ecological potential to foster their conservation and recreation values while maximizing their sequestration capability and stored carbon pools.

The model for stewarding our public forests should be as natural as possible with little interference. Forests given the opportunity to self-prune attain the highest levels of sequestration. As a management approach it is called proforestation and is defined as protecting forests to reach their full ecological potential 1. Proforestation however does not equate to no management at all. In many cases some active restoration is needed to ensure ecological values are attained 2. NJ's forests are subject to many stressors such as ash borer that is taking at least 13% of the State's trees, storms such as IDA that cost another 5% of our trees as well as the impacts of climate change. Overbrowse by deer and the spread of invasive, non-native species of both plants and animals must be addressed to ensure regeneration and survival of ground layer and understory plants, including the next generation of forest trees 3. Better ATV management is also necessary. Tree harvesting exacerbates all these problems. 4, 5 Creating young forest by cutting old forest is simply unnecessary and harmful 6, 7.

Proforestation fosters natural resilience to increases in pests and pathogens with genetic adaptations that are occurring already 8, 9, 10. Many of the climate impacts we are seeing such as increased wildfire also are part of the forests restoration and adaptation to new conditions 11, 12. In the Wharton Forest, where fire is vital to maintaining ecosystem health, a recent fire was allowed to burn safely to established breaks, creating increased structural diversity and more varied microhabitats. Prescribed burning, instead of logging, can be consistent with proforestation 13, 14, 15, 16.

Before any management is considered an ecological inventory must be completed for baseline purposes as well as a compilation of existing data for that site. Plant lists should be recorded on the national Floristic Quality Assessment (universalfqqa.org) database. Priority for monitoring should be given to the intact forests on native soil that have never been plowed as well as areas of higher diversity. All of these values would be monitored in a proforestation approach 17.

" Over time unmanipulated forests develop the greatest complexity and accumulated carbon storage and therefore serve as models for ecological forestry" 18,19 . At this point in time logging in public forests is only 13% of the industry in NJ. This is not the time to expand harvesting for any purpose, especially for wood products extraction 20. Climate change and the loss of biodiversity are the most severe threats to our planet. The management of our public lands should prioritize these concerns.

Matthew Olson

Need for an actionable and comprehensive forest management plan for NJ public lands

There is a growing consensus in forest science that narrowly focused management frameworks (e.g., production forestry) are not up to the challenge of sustaining healthy forests under changing climate and disturbance regimes (Park et al. 2014, D'Amato and Palik 2021). Successful management systems will need to remain flexible to adapt to future uncertainties in real-time.

On-size-fits-all strategies can have negative ecological consequences. In the Lake States, decades of uneven-aged silviculture have homogenized forests, raising concerns about increased vulnerability to climate change and forest health threats (Knapp et al. 2019). In central Europe, forests under uneven-aged management were found to support fewer taxa at multiple scales compared to forests under even-aged management approaches, which was tied to greater habitat diversity in the latter (Schall et al. 2018).

Ecological forestry is a naturalistic approach to forest management that integrates our understanding of natural forest dynamics at multiple spatial and temporal scales in the design and implementation of silvicultural systems. Although conservation of biodiversity and ecosystem function are primary goals, ecological forestry has the flexibility to address a much wider range of goals, including ecological restoration, climate change adaptation, and forest health threat mitigation (D'Amato and Palik 2021).

Active and passive approaches to forest management are only mutually exclusive at the stand scale. However, these strategies can coexist at the larger landscape scale to enhance both adaptation and mitigation potential for addressing climate change. This is not new idea. Foresters have established "set-asides" and "ecological reserves" within their management units for some time and, in some states, it is standard practice on public lands (e.g., Missouri).

I propose that the New Jersey DEP develops a comprehensive forest management strategy for state lands that integrates both ecological forestry and proforestation at the state and forest levels. The recently published state forest action plan is fine as a guiding document, but it is not an actionable plan per se. Our state needs a comprehensive yet actionable plan for managing public forests in an uncertain future.

Michael Van Clef

Assigning State Land Forest Management Goals

Recommendation (to be performed by NJ Forest Service with other state and private stakeholder input): Request legislative mandate, with appropriate resources, to develop a comprehensive overarching plan that identifies broad habitat stewardship goals across all state lands. The proposed level of specificity would clarify the states' goals for stakeholders and the general public. This would reduce concerns that have arisen from planning and implementation at selected individual state lands outside of the context of a specific overarching plan.

Broad Explanation:

An overarching stewardship goal would be assigned to each state land (i.e., delineated forest stands within them). Individual site goals would be set within the context of an overarching statewide goal (i.e., percentage of land assigned to each goal type).

Goal Types:

- 1) Old Growth / Proforestation - Harvesting and removal of trees is prohibited. Minor girdling or felling of smaller trees allowable to hasten old growth characteristics and create light mosaics suitable to encourage a broad range of forest species. Prescribed burning and invasive species control are allowable.
- 2) Active Forest Canopy Management - This includes sale of timber to fund costs of initial operations and additional stewardship tasks to maintain treated areas. This would include creation of

'young forests' at a level that captures ecological 'economies of scale' (i.e., quantity and distribution match needs for a suite of early to mid-successional species). Maximum canopy reduction levels and harvesting methods must be defined for each stand (e.g., 10-100%) and statewide goals must adhere to pre-determined levels of proposed levels of canopy reduction.

- 3) Open Habitats - Upland meadow and open marsh habitats
- 4) Built Areas - Areas utilized for park offices and amenities

In setting goal types:

- 1) Consider historic forest age distributions and tree species composition that existed for over 10,000 years prior to European settlement
- 2) Consider all elements of biodiversity. For plants, includes forest canopy and subcanopy trees, shrubs, and wildflowers. For animals, includes species requiring each stage of succession.
- 3) Consider effects of overabundant deer and invasive species
- 4) Consider prescribed burning as a key stewardship tool
- 5) Consider broad landscape context of surrounding public and private lands
- 6) Consider physiographic province (e.g., open woodlands may be favored in Pinelands region)

Sandra Chen

Establish Ecological Forestry Institute at Rutgers

Sara Webb

For forests of New Jersey's public conservation lands, do not permit logging management

For New Jersey's public conservation lands, do not permit logging management nor stewardship that involves canopy clearing, cutting, or thinning of native trees from large or small acreages. This Forest Task Force was established in response to a groundswell of concern about widespread logging of our oldest and best remaining public forests. Such management steeply depletes climate resilience (refs 1 2 3 4 5) and sacrifices forest-interior species and ecosystems 6 12 13, which cannot return because of deer 6 and invasive vegetation 14.

Thus, NJ must establish new policies to keep our mature canopy trees and biodiverse natural forests intact: not to replace with young forest, not for early-successional wildlife far less imperiled than forest interior species, not for commercial logging. Exceptions should be strictly limited to invasive plants, specific pathogens and insects requiring quarantine to prevent spread, and ecological restoration projects for highly-degraded forests.

The science is clear: for climate resilience, our large trees and mature forests absorb AND store the most planet-warming carbon, per tree 7 11 15 and per acre 13 7 9 2, far more than young or managed forests 1 2. Our forest ecosystems store carbon for centuries 3 9, and sequestration increases with age for 87% of tree species, to store ever-increasing volumes of carbon 7. Removing large trees also sacrifices future capacity for carbon sequestration 4. Forest disturbance accelerates these losses and global warming 3.

Carbon storage in wood products is no substitute for living trees because carbon absorption has stopped, and because wood products are surprisingly short-lived 10. Only 1% of wood products are still in use and 13% of harvested biomass is in landfills 100 years after harvest 8.

Today's logging approach is also wrong for biodiversity. Contiguous forest is essential to provide migration pathways for species to shift northward as the climate warms. US Forest Service and Nature Conservancy models indicate New Jersey will be a critical corridor for plants and animals to avoid extinction 18; 19= <https://maps.tnc.org/resilientland>. In the present day, remarkably extensive "stewardship" clearings have no natural analog in our forests 16, and logged clearings do not recover their natural forests because of deer and invasive species, whose control is difficult and costly. Canopy logging as well as the mechanized transport and harvest of timber also have impacts on soil, hydrology, vernal pools, other microhabitats with specialized wildlife, and understory vegetation including the future forest of young trees.

Sara Webb

Reduce Conversion of Old Forest to Young Forest

New Jersey must protect our uncommon mature forests to age naturally, keeping forest canopies intact. The state must end the WIDESPREAD policy and practice of clearing natural forests within public conservation lands to create young forest. This facilitates problematic deer and invasive species while impairing forest-interior ecosystems and climate defense.

Public conservation lands are New Jersey's last, best refuge for natural forests and forest-interior wildlife. Unbroken mature forest covered most of New Jersey prior to Euro-American colonization; young forest and open fields were uncommon. Paleoecology research finds that the amount of young forest today is not natural but several times higher than in pre-European settlement times 1,2.

Much recent logging of public forests is justified as habitat improvement for early-successional birds and deer, which are not the species in trouble. Wildlife of intact forests and undisturbed wetlands are far more threatened than species of openings and edges. Early successional habitat is abundant in New Jersey. Deer are the major obstacle for young trees today and clearing old forest does not fix but exacerbates the deer problem.

Most of today's Stewardship Plans for NJ public forests both harvest and fragment older forests, creating early successional habitat by rotating clear-cuts through throughout natural public wildlife management areas and other lands. Removed biodiverse mature forests do not return because of deer 3 and invasive species 4 This practice continues today in century-old forests at Sparta WMA and elsewhere, despite vigorous objections from scientists and land conservation experts.

Replacing old forest with young greatly weakens climate defense. Larger trees take up (sequester) far more carbon because of their greater leaf area, and they store far more carbon, particularly below ground in roots and soil 5 6 7. On a per-acre basis, older forests both sequester and store more carbon than younger forests. Established natural forests are the most carbon-dense, and will contribute orders of magnitude more removal and storage of greenhouse gases over time than either young forests or working, managed forests. 5 9 8 10.

The State must prioritize preservation of forest interior habitat over early successional species. Current landscape-level deforestation should be replaced by focused projects growing young forest on open land and invaded woodlands not in patches cleared from existing healthy intact forests. New Jersey's forest interior habitat is limited, fragmented, and must be protected, for its high ecological and carbon sequestration values and for its scarcity today.

213x

Vinh Lang

Forest Conservation Zoning: Allocation of Proposed Management Areas on publicly owned lands for change resiliency

To adopt coordinated management direction for lands administered by the NJDEP. Socio-ecological goals can be met by considering trade-offs and tailoring land management to variations in ecosystems, climate, and social values across state owned lands (Spies, et al., 2019). An array of forest zones modeled after the Northwest Forest Plan and Great Barrier Reef Marine Park Zoning Plan would help allocate forest resources management to meet social-ecological values, improve forest and biodiversity resiliency, and mitigate climate change in New Jersey.

Forest management zones are areas where various forest management activities and conservation objectives can occur through complementary approaches. Landscape level maps are used to designate zones for public information. The areas are clearly delineated by natural features and existing infrastructure. The zones may be tiered; a protected Conservation Zone may be surrounded by Management Zones where active management and restoration may occur. Lastly, Habitat Zones allocate areas on State Lands where the objectives of active management are primarily to enhance/maintain flora and fauna habitat which has been degraded. "Habitat loss is the greatest threat to New Jersey's wildlife," (NJ Wildlife Action Plan, 2018).

Having a diversity of structural and functional forest zones provides a greater assortment of options in the face of climate change, (Pace et al., 2015). The public can clearly know that both protection and management of the forest is occurring. Zones assign a locale to often differing and sometimes conflicting management goals.

The costs to the State are minimal for this proposal.

As an Example:

Conservation Zones: Depending on the size, configuration and locale of the State-owned land, mature forest or special forest types (riparian forests, pygmy pine plains, etc.) may be marked as a "Restricted Activities" zone; providing special habitat protection for T&E species, high carbon reserves, special scenic value, etc.

Management Zones: Ecological forest management and adaptive planning/monitoring to address socio-ecological values under changing climate: forest management to re-introduce healthy fire, storm salvage, Invasive species removal, and other values (Franklin et al., 2018).

Habitat Zones: Designated via approved Forest Stewardship Plans for project areas to enhance or create T&E habitat which has been lost due to development, fire suppression, or natural succession. This may include re-introduction of natural disturbance regimes, succession management, corridors, and connectivity of habitat."

Appendix E-5

Proposals that were accepted but not discussed

Proposals that were submitted and accepted by the co-chairs as aligning with the criteria for acceptance. At least three of four co-chairs agree that proposal met criteria. These proposals were not discussed by workgroup participants due to time constraints. Because discussions on proposals continually veered toward the topic of tree cutting and wood removal, co-chairs moved to a different approach for workgroup meetings. While there were ideas and proposals that deserved discussion and consideration, they were not covered due to these factors. There were 29 proposals in this category.

Narratives were limited to 2500 characters. Proposal sponsors were invited to also submit references, which are not included here due to space limitations but are available using the sponsor's citation(s) when provided. Footnotes in the proposals indicate a reference to an article, file, memo, or other document. Note that references submitted ranged from unpublished opinions, magazine and news articles, webinars, and journal articles (some peer-reviewed and some not peer reviewed).

Branwen Ellis

Forestry Policies for State Owned Lands in the Pinelands Area

This memorandum identifies the specific forestry policies that the Commission may wish to consider recommending to the New Jersey Forest Task Force for State owned lands in the Pinelands Area. The Forest Task Force was formed by New Jersey State Senator Bob Smith to study and identify ways in which the State can best manage its forests.

If the Commission decides to support some or all of the identified forestry policies, the Commission may wish to recommend the policies to the Forest Task Force for only State owned lands in the Pinelands Area. To the extent that the Forest Task Force determines that some or all of the Commission recommended policies for the Pinelands Area are applicable to the balance of State owned land in New Jersey, that would be a determination of the Forest Task Force.

For background information, page three of this memorandum provides the Pinelands Comprehensive Management Plan (CMP) definition of "forestry."

For further background information, page four of this memorandum provides important language from the Pinelands Protection Act. Providing an overview of the goals of the Pinelands Protection Act, particularly the different goals of the Act with respect to the Pinelands Protection Area and the Pinelands

Preservation Area, will hopefully facilitate the discussion of forestry policies for State owned lands in the Pinelands Area. For reference, the State owns nearly 365,000 acres of land in the Pinelands Area, including State Forests, Wildlife Management Areas and other open space lands. Approximately two-thirds of this acreage is located in the Pinelands Preservation Area. The remaining third is located primarily in the Pinelands Forest Area, which is within the Pinelands Protection Area.

The fifth page of this memorandum identifies the specific forestry policies that the Commission may wish to consider recommending to the Forest Task Force.

Please note that the identified forestry policies are limited to the matters that the Commission regulates.

For example, the Commission does not regulate hunting or fishing or directly regulate offroad vehicle

usage in the Pinelands Area. Accordingly, the staff has not recommended forestry policies relative to deer management or offroad vehicle usage.

Geoffrey Lohmeyer

Controlling the illegal off-road vehicles plaguing NJ forests

NJ Forest land specifically in southern Pine Barrens of NJ and in the forests of the northern tier counties of the state have seen a huge increase in the volume and intensity of off-road vehicles. State parks as well as county open space has been decimated by the illegal use of dirt bikes, and ATV's. Loss of habitat and pure destruction to the natural environment by this use is something that needs to be stopped.

Every weekend large groups of people, increasingly from outside the state, are using our natural forested land as a haven for their illegal "fun". With the numerous access points to many of these properties it makes it very difficult to police. The cost to set up patrols with local police forces or New Jersey Park Police and New Jersey State Police resources doesn't exist at the scale needed.

The New Jersey Recreation and Park Association would like to propose a project that would identify means to strengthen our rules/laws to combat the issues of illegal off-roading. These rules would be such that all law enforcement agencies state wide would be able to write tickets of enforcement. We recommend identify funding sources to protect our valuable resources and enable state wide patrols to take place. We must be proactive to protect these natural areas before the reason for which they were preserved is no longer present.

Greg Gorman

Categorize Carbon Management Strategy

The USDA designed "Adaptation Strategies and Approaches" specifically for forest carbon management and draws direct connections between climate adaptation and mitigation (Ortl, Todd A. et. al, January 2020). (Stewardship2) In developing the Forest Stewardship Plan, the State approved consulting forester (Stewardship4) shall perform a climate vulnerability assessment of each forest stand using USDA's "Adoption Workbook" and select an appropriate carbon management strategy/approach from Table 1. "Menu of adaptation strategies and approaches for forest carbon management" on p. 89 of Ortl et. al, January 2020. (Stewardship1 & 3) A forest stand is a contiguous community of trees sufficiently uniform in composition, structure, age, size, class, distribution, spatial arrangement, site quality, condition, or location to distinguish it from adjacent communities. The Adaptation Workbook can be found in the US Forest Service report: Forest Adaptation Resources: Climate Change Tools and Approaches for Land Managers (Swanson, Christopher W. et.al. September 2016). (Stewardship5) It is recommended that legislation include the requirement for Forest Stewardship Plans to identify the selected climate adaptation/mitigation strategy for each forest stand and describe the appropriate management prescriptions to achieve the desired carbon management objectives. NJ DEP State Forester shall develop a means of oversight and monitoring execution of the plan.

Greg Gorman

Categorize Climate Adaptation Strategy

In developing the Forest Stewardship Plan, the State approved consulting forester (Stewardship4) shall perform an ecological vulnerability assessment of each forest stand using USDA's "Adoption Workbook" and select an appropriate climate adaptation management strategy/approach from Box 18 "Menu of

Adaptation Strategies and Approaches” on p. 139 of Swanston et. al, September 2016. (Stewardship 6) A forest stand is a contiguous community of trees sufficiently uniform in composition, structure, age, size, class, distribution, spatial arrangement, site quality, condition, or location to distinguish it from adjacent communities. The Adaptation Workbook can be found in the US Forest Service report: Forest Adaptation Resources: Climate Change Tools and Approaches for Land Managers (Swanson, Christopher W. et.al. September 2016) (Stewardship5).

It is recommended that legislation include the requirement for Forest Stewardship Plan to identify the selected adaptation strategy for each forest stand and describe the appropriate management prescriptions to achieve the desired climate adaptation objectives. NJ DEP State Forester shall develop a means of oversight and monitoring execution of the plan.

Greg Gorman

Study the impacts of forest management techniques on New Jersey’s aquifers and water

supplies. Considering the importance of New Jersey’s aquifers to our drinking water supply and quality, any discussion of forest management should include an analysis of the impact of management techniques on New Jersey’s aquifers. (See Climate.Gorman.WaterQuality1-Map of NJ Aquifers).

Management techniques including both passive and active approaches cover a wide range of methods, each of which should be considered in terms of their potential harms and benefits to water quantity and quality.. Of most importance are the Kirkland-Cohancy Aquifer and the Highlands.

From the BC (British Columbia) Journal of Ecosystems and Management, there was acknowledgement that land degradation will have a major impact on carbon capture, recharge rates and forest vitality. But much is unknown. For example, there was also an admission in the study that effects of canopy openness are under-studied (Climate.Gorman.WaterQuality2-Bart Muys et. al. 2021). Forest management techniques may also have an impact on water table elevation, a vital consideration for New Jersey’s management of its drinking water supplies (Climate.Gorman.WaterQuality3-Brian D. Smerdon et. al. 2009).

Different forest management techniques will likely have differing impacts to our water ecosystems with significant and possibly adverse consequences for generations to come. Studies of the impact of forest management should highlight protection of vital watersheds where the state’s major population centers, such as Newark and Camden, get their water from.

In summary, any discussion of how we keep New Jersey’s forests resilient in the face of climate change should consider the implications to our aquifers and the availability of plentiful, clean water. It is recommended that the legislature designate a portion of the state’s RGGI funds or other funding to authorize Rutgers, the State University of NJ, in conjunction with the NJDEP and other relevant state agencies, to conduct a scientific review and synthesis of existing studies and literature pertaining to the effects of forest management, or the lack thereof, on water quality and quantity. The amount appropriated for this review should be \$300,000 or another amount that is consistent the normal scope of completing such a review.. The report shall include a description of recommended program for monitoring and analysis of forest management and its impacts on water supply and quality as well as cost estimates for implementation. .

Joe Basralian

Require DEP to site-visit before FSP approval and shortly after FSP implementation

Title 13, the legislation governing the DEP’s Forest Stewardship Plans (FSP), is lax on inspection and enforcement of FSP implementation.

Title 13 makes it OPTIONAL for DEP to inspect forest land prior to approving an FSP, and allows DEP to wait THREE YEARS before visiting the forest after FSP implementation. This laxity makes DEP enforcement untrustworthy, and opens the FSP process to public doubt.

13:1L-31b states, "The department may elect to inspect the forest land, prior to determining whether to approve a forest stewardship plan." "May elect" means it's optional. Budget constraints at DEP make it plausible that DEP won't inspect. This permissible laxity is hard to fathom in a state like NJ, and with something as dear as our public forests.

13:1L-31b continues, "After the department approves a forest stewardship plan, the forest land shall be subjected to inspection by the department during one of the first three years following approval and at least once every three years following the first inspection." Can you imagine that the DEP can wait three years? That makes it impossible to hold the stewardship plan implementors accountable for any problems or abuses that could occur. Perhaps the most lax protections in New Jersey? If I make even a minor change to my home it's subject to nearly immediate inspection afterwards. Our precious public forests deserve better than "take a look three years later."

Proposed:

- 1) Require DEP to physically inspect the area of the forest being proposed for a FSP before approving an FSP. File report on public website.
- 2) Require DEP to physically inspect the area where an FSP was implemented within three months after FSP is completed. File report on public website listing the ways in which implementation was compliant and not compliant with the approved FSP.
- 3) In #1, require reporting of the number, diameter and species of trees over 6" caliper at 5' height that are targeted for removal. In #2 include a final accounting of these and a comparison to the expected number.

Countless papers attest that timely inspections and data improve compliance. This concept is the backbone of organized society and government. For example:

Journal of Environmental Law: <https://academic.oup.com/jel/article/23/2/169/426247?login=false>

EPA: https://19january2021snapshot.epa.gov/ust/do-more-frequent-inspections-improve-compliance-evidence-underground-storage-tank-facilities_.html

Journal of Public Policy: <https://journals.sagepub.com/doi/10.1509/jppm.21.2.319.17578>

John Saponara

Expand threatened bird species along utility rights of way, not by cutting blocks of forest

NJ's position on the flyway for many migrant birds presents a great opportunity to steward these species, especially the most threatened.

But biodiversity must be promoted within a framework of minimizing the carbon cost of conservation, not only for humans but also for the many wildlife species impacted by climate change.

We should map forest edge and ROWs (utility rights-of-way, namely transmission line corridors, highways, and railroad beds) for their potential to expand existing populations of threatened species.

Advantages of ROWs for promoting shrubland birds:

- Many thicket birds are already present along ROWs at high densities, even without management to favor those species [eg Table 2 in 1].
- Studies demonstrate that these species can benefit from targeted management along ROWs [2, 3].
- Findings of relatively low nest success in some situations can be due to short study duration, mistaking low return rates for low survival [4], or the fact that the birds colonizing small patches are the losers in the competition for big patches.

Drawbacks of cutting blocks of forest to promote shrubland birds:

- Patch cuts are short-term fixes that require further logging elsewhere to maintain a population [5], whereas power utilities have pioneered the use of selective clearing and herbicide application to maintain stable shrub communities [6].
- Creating a patch is no guarantee that it will be colonized by the target species, and patch cuts are not generally evaluated against their goals. NJFW's goal for the Sparta Mountain WMA was to create habitat for imperiled species yet groups all species together in graphs of "Number of bird species" before and after treatment, with no error bars that might help suggest whether differences are significant [11]. Admittedly I have yet to request more detailed data.
- "Minimum patch size" requirements are much smaller than many patch cuts, up to just 1.1ha (2.7ac) in [6]. At Sparta Mountain WMA we cut 10acres per year for 10 years.
- "Minimum patch size" requirements are based on observations, not manipulations, and thus demonstrate species preferences, not requirements. Some studies acknowledge some of these methodological inadequacies [6].
- Thus many "minimum patch size" requirements may be overestimated [7].
- Danger of climate change to wildlife

Although today climate change is just #6 of the 10 greatest threats to wildlife generally [8], among the most sensitive to climate is the famed Golden-winged warbler [9]. Its range, which includes just the northwest corner of NJ [Figure 1-3 in 10], is shifting northward, and already NJ hosts just 0.02% of its breeding population [Table 1–7 in 10].

Katherine Evans

Reinstate Citizen Scientist Program for Critical Habitat Species

Amphibians are major contributors to overall forest health. In order to protect their aquatic and terrestrial habitat and the critical services they provide, accurate mapping is necessary.

In the past, the citizen scientist program contributed greatly to the Natural Heritage database and it needs to be reinstated. In the case of vernal pool critical habitat, it is invaluable. All requisite fieldwork data (geolocation, species, etc.) is verifiable with today's cellphones.

On the ground certification has been replaced with remote sensing/digital orthography which cannot verify vernal pools. (You can't ID amphibian egg masses, for example, with remote sensing analysis.) The F&W description states this system detects depressions that are likely vernal pools, but that they need to be verified on the ground.(1) This incomplete "potential vernal depressions" data should not be used to replace verified data and cause decertification of already certified pools! Most of the state's vernal pools that were officially certified and recognized for years are now being considered "potential." This is extremely problematic because they no longer show up on important maps used for forestry plans, or by the state (ie Highlands Council) and municipalities to make regulatory determinations.(2 & maps)

On the ground citizen surveys with verifying data show that pools demoted to "potential" on the new maps are indeed still there. Vernal pools, mostly geologically formed, do not simply disappear. Many amphibians return only to their natal pools to lay eggs, using them generation after generation. On

Sparta Mtn WMA, for example, where there are over 30 certified vernal pools, the new mapping depicts only about 4. Logging equipment has damaged vernal pools and egg masses and caused severe rutting.

The vernal pool citizen scientist website has been offline for years now. For years, the DEP has been claiming to be too “understaffed” to do field verifications or input data that citizens have been providing. If the Div of Fish and Wildlife is too “understaffed” to carry out fieldwork, input data or do other baseline ecological studies, they should not be altering existing data or writing forestry plans that degrade our public forests/critical habitat.

Why eliminate one of the most helpful sources of field data-the citizen scientists program?` Reinstating the program with acknowledgment of sighting receipt and data input scheduled 2x yearly is a logical solution.

Ken Dolsky

Maximize Carbon (C) Storage and Sequestration (S&S) by Banning Harvesting Trees on Public Lands

NJ climate policy requires maximization of C S&S on public forestland to support the GWRA (increase sequestration 33% by 2050). GWRA 80x50 Report: “This optimistic projection, however, would require the use of all currently available open space for sequestration, requiring a major transition in New Jersey’s current land use laws and practices.” (p. xix). Maximizing S&S is needed to achieve EO 274 (50% reduction in GHG emissions by 2030 (reduction of 60MMT).

Because older forests store and sequester more C than young forests, this requires a policy of allowing forests to mature and a ban on harvesting or commercial logging.

Peer-reviewed studies support this proposal by demonstrating:

- Older temperate deciduous forests store and sequester more C per unit area than younger forests.
- Young temperate forests are net emitters of C for many years.
- Older forests’ rates of growth and C gain increase continuously with tree mass for hundreds of years.
- Aboveground biomass of most US forests will not decline with age. A substantial amount of additional C could be stored in US forests if large second growth tracts were preserved.
- Even considering sequestration of C in wooden buildings, timber harvest results in a net flux of CO2 into the atmosphere.
- Confusion over the age at which forests sequester the most C is because young trees grow in height faster than old trees and the rate of sequestration in a young forest can be high. However, volume is more important than rate. It is not how fast C deposits are made but how large those deposits are. Young forests are limited in the size of their deposits by their leaf area.
- Conversion of old-growth forests to young invariably reduces C storage, even when structural components in buildings are considered...forests continue to lose mass for three decades after disturbance. Although reintroducing forests to deforested regions will increase C storage, conversion of old-growth forests to younger forests has added and will continue to add C to the atmosphere.
- We find no scientific evidence to support increased logging to store more C in wood products, as a natural climate solution.
- Overall, logging in U.S. forests emits 10 times more C than fire and native insects combined.
- Afforestation and reforestation, while helpful on open land, cannot store or sequester more C than existing forests on a per acre basis and cannot be used to justify harvesting of mature forests.

See source #1 - Carbon sequestration and storage data – young vs old document for expanded narrative and other sources.

Ken Dolsky

Public Forest Management regulations shall be promulgated by a transparent science-based development process that includes public notice and comment.

Proposal - Climate and Ecological Health Workgroups: Public Forest Management regulations shall be promulgated by a transparent science-based development process that includes public notice and comment

The current process for developing public forest policy is by internal directives, not based on legislative mandates or statutory authority and whose validity are questionable. DEP has not provided peer-based science studies as evidence that its policies and practices are appropriate solutions responsive to climate change and the ecological health issues of NJ public forests. Nor has DEP demonstrated by any science-based metrics that its management practices have achieved the desired objectives.

The process for developing public forest policies and regulations:

- Require all public forest climate and ecological policies to be based on peer-reviewed science studies and documented results from similar policies and practices. Policies must include written commitment by the State to fund, manage, enforce and maintain oversight of the resulting activities to avoid actions in violation of contracts or cause long term or irreversible harm to the natural resource and climate mitigation values of public forests;
- Require a well-defined process including detailed inventories and analyses of the existing ecological populations and the anticipated impacts of climate change to the populations;
- All proposed policies and practices shall be developed under the direction of an oversight board. The board shall include representation by NJ DEP/F&W, forestry industry, NJ Highlands Council, NJ Pinelands Commission and an equal number of members of conservation and forest advocacy non-profits, including NJ Forest Watch, NJ Highlands Coalition, NJ Conservation Foundation, Pinelands Preservation Alliance. All policies and proposed actions must be approved by two thirds of the voting members;
- Require any group to resolve objections to its policies/actions in writing, based on proven science or objective evidence. If such a process does not resolve an issue, the services of a provably objective arbitrator will be used to make the final decision on the validity of the proposed policies/actions;
- The development of policies and regulations and supporting arguments and evidence as stipulated above shall be publicly accessible and subject to public comment.

This would allow the public to be informed and engage in policy development and implementation. The public may challenge policies and actions where there is evidence they are ineffective or harmful. Regulations could also be challenged if the agency lacks adequate resources for oversight and enforcement.

Ken Dolsky

Proposal to Require Addressing Climate Change to be the Default Priority for all Public Forest Management Decisions

Definition: Carbon sequestration is the amount of carbon accumulation per unit of land area per year, net of respiration. Increasing sequestration is equivalent to decreasing GHG emissions.

Climate change is the most important ecological threat to NJ and, therefore, it must be considered in all projects. Those that will reduce its impact should have the highest priority. Projects that increase its impact should have very low priority.

Addressing climate change includes mitigation (increasing carbon storage and sequestration) and adaption (protecting clean water, managing stormwater runoff, etc.).

GWRA 80x50 Report: NJ climate policy requires maximization of sequestration in NJ's natural carbon sinks to support the GWRA objective (increase sequestration 33% by 2050 from 8.1MMT to 10.8MMT per year). "This optimistic projection, however, would require the use of all currently available open space for sequestration, requiring a major transition in New Jersey's current land use laws and practices." (p. xix). Maximizing sequestration is also needed to achieve EO 274's 50% reduction in GHG emissions by 2030 (reduction of 40MMT).

Total annual sequestration of all NJ forests in 2018 is estimated to be 4MMT (NJ State FAP 2020, p. 82). A 33% increase would be 1.3MMT. DEP has not published information on the potential increase in sequestration by types of sinks, nor a plan to achieve this. Given the caveat in the GWRA Report, recent research demonstrating that older forests store and sequester more carbon than young forests (proposal #31), and the lack of information on sequestration sinks, it must be NJ policy to include an analysis of the sequestration capability of affected sinks and prioritize sequestration as part of all public forest management decisions.

Decisions on all proposed NJ public forest projects must specifically (and quantitatively) be based on peer-reviewed science and include:

- Multi-year analyses of the benefits/harms of these actions on GHG targets specified in NJ climate change policy (for 2030 and 2050), as well as a long term projection (e.g., 100 years)
- Benefits/harms to climate adaption
- Measures of other anticipated benefits and associated harms (e.g., destroying some species' habitat to improve it for others)

Projects that will increase GHGs and/or harm climate adaption should only be allowed to proceed if an independent third party (see Oversight Board in proposal #68) finds that the net other benefits outweigh the climate change benefits.

Kristen Meistrell

Mesophication must be controlled in northern NJ Public Forests for Climate Change Resiliency and Adaptation

Northern NJ has been dominated by oaks for thousands of years (1) but these oak forests are being lost through the conversion of shade-tolerant northern hardwood trees through a process called mesophication(2). Mesophication is caused by the absence of fire and other forest disturbances and results in a feedback loop that promotes moist, cool microclimates that encourage shade-tolerant northern hardwood tree species & prevents the regeneration of oaks, hickories, & cherries(3). The presence of the mesophytic northern hardwoods also alters the ecosystem function of oak forests by changing the hydrology and reducing the availability of water, sunlight, & nitrogen in the forest(4,5,14).

Mesophication will result in lower live tree carbon storage & carbon sequestration rates(6) in addition to an increased risk of forests in northern NJ becoming net carbon emitters. Warmer temperatures & the potential for more frequent droughts in the summer are projected in this area(7, 8) which will increase water stress in plants(9,10) & lead to increased mortality of tree from other factors(7). Mesophytic trees tend to not be drought tolerant (8,9) & are projected to decline in future climate conditions, particularly in a high emissions scenario(11 www.nrs.fs.fed.us/atlas). Mesophytic forests will reduce the range of available wildlife habitats.

Potential actions to reduce impacts of mesophication & risk of mortality from drought, as well as enhance the resilience of forests, include prescribed fire, thinning forests & facilitating regeneration to promote tree species better adapted to future climate & drought conditions, such as oak (8). Promoting diverse age classes through a variety of techniques & reducing competition for moisture, nutrients & light can increase water availability(14) & biodiversity(15,16). These actions can maintain a mixed-oak ecosystem & control invasive exotic plants, maples, & other trees less adapted to future climate conditions(8,17,18).

All of these options, & others we may not have thought of yet, need to be available to have a flexible approach to accommodate diverse geographic settings, local site conditions, & other considerations when helping the forests in northern NJ be better adapted to future climate conditions(12). A one-size-fits-all approach to forest stewardship is insufficient for climate adaptation, and any restrictions that limit the focus of forest mgmt. to a single action would be detrimental to forests in northern NJ. Instead, a diversity of adaptation options based on climate impacts as well as landscape & ownership context must be allowed in any proposed forest stewardship legislation(13).

Kristen Meistrell

New Jersey's Forests and Wildlife Depend on Disturbance

Many believe all virgin forests consisted of closed-canopy old-growth forests and that forests in NJ prior to European settlement (EuS) were similar to the dense forests of today but with larger trees. The majority of NJ was forested prior to EuS but not like those many have imagined. Early settlers reported open woodlands with 10-30 trees per acre in NJ (1), and heath hens, a grassland-shrub-dependent bird that is now extinct, were abundant in NJ (2).

Open-canopy forests & shrublands were much more prevalent in NJ's landscape pre EuS than today, ranging from a maximum 50% in northern NJ to 80% in southern NJ from various disturbance events (excl. beavers), and old growth forests consisted of <7% of the landscape (1, 3, 4). Today <8% of forests are open-canopy forests & shrublands, >80% are closed-canopy mature forests (2019 FIA, 2015 LULC), and 15% of all NJ public forests have a reserve status (FIA 2019).

Changes in forest composition and structure pre EuS to today have impacted wildlife because many declining wildlife in NJ, including >30% of SGCN, need open-canopy forests, grasslands, and shrublands (2, 6, 7). About 2.9 B birds have been lost in North America since 1970 & the cause of decline is habitat loss (5, 7). When looking at 59 forest bird species that breed in NJ, 30/31 birds that suffered declines either breed in shubby/open-canopy forests or bring their chicks to shrubby/open-canopy forests after leaving the nest (5, Birds of North America).

Forest stewardship is needed to increase biodiversity & create a complex of wildlife habitats on public lands necessary to ensure the persistence of NJ's biological diversity (2, 6, 7). Forests on public lands in NJ managed for shrubby/open-canopy forests resulted in the number of bird species more than doubling, and SGCN tripling, compared to bird observed in closed-canopy mature forests prior to

treatment (8). Even so, NJ has an implementation gap when it comes to forest stewardship on public lands; only <0.5% of the <0.1% of forests in NJ managed annually are public lands (9, FIA 2019).

Legislation needs to facilitate active stewardship in NJ's public forests to remove the implementation gap and restore the structure & composition of forests similar to the historical disturbance regimes of fire & hurricanes prior to EuS. The 15% of public forests with reserve status (FIA 2019) exceeds the amount of old growth forests in NJ pre EuS (1, 3, 4). Creating more reserves for a single ecosystem service or creating more old-growth forests would counteract the needs of wildlife & disturbance-dependent forests in NJ and should not be mandated.

Kristen Meistrell

Mesophication must be controlled in northern NJ public forests for wildlife/ecological health

Few keystone plant genera support more than 90% of Lepidoptera species in the US, with oaks being the most important, followed by willow, cherry, pine, and aspen(1). Trees that support the most spp. of caterpillars are preferred foraging trees for insectivorous birds, especially during the breeding season(2). The most important tree spp. for Lepidoptera are either shade intolerant or intermediate shade intolerant, meaning seedlings need sunlight to germinate and grow tall and fast enough to be competitive (Wikipedia). Oak are intermediate shade-intolerant & have dominated northern NJ forests for thousands of years(3,4); however, oak forests are now being lost through a process called, mesophication, or the conversion to more shade-tolerant northern hardwood trees, such as maples(5). Mesophication is caused by the absence of fire & other forest disturbances and results in a feedback loop that promotes moist, cool microclimates & encourage the proliferation of shade-tolerant northern hardwoods(6). Although the microclimate remains moist, there is a decline in the overall water supply due to increased water use by the mesophytic trees(7). Closed-canopy forests that also result from mesophication promote soil pathogens that maples are resistant to but cause diseases in species like cherry(8). The conversion of oaks to maples may also be enhanced by the mortality of ash trees from the emerald ash borer(9). While maples & birches also support Lepidoptera species, their combined importance score is less than oaks(1). Birds, bats, and other wildlife depend on oak forests for forage. Oaks are host plants for hundreds of species of lepidoptera caterpillars, which then provide forage for many other species of wildlife. Additionally, many species rely heavily on acorns that are produced by oak forests, so it is critical that oak forests of northern NJ are able to regenerate & stay as oak forests. The methods needed to address mesophication & regenerate oaks & other important shade-intolerant host plants needs to be determined on a site-by-site basis, but depends on several factors, such as location, soil moisture, & current spp. composition(10). Typically, the methods needed to address this require thinning the canopy and prescribed burns to allow enough sunlight for regeneration(4,10), and using other techniques such as herbicide applications and continued maintenance for decades to successfully control mesophication & establish a functional oak forests(4,10). Legislation is needed to require the development of Forest Stewardship Plans for public land in NJ that address mesophication and evaluates and utilizes all the tools available, including those above.

Kristen Meistrell

Maximizing Ecosystem Services provided by New Jersey's Public Forests

Forests provide a variety of ecosystem services (EcoS), such as carbon storage & sequestration, biodiversity, water quality and quantity, & wood production. The extent & types of EcoS forests provide depend on the surrounding landscape & forest composition, structure, age, & growth/regeneration

rates (1,2). The public also uses forests for a variety of recreational activities (hunting, camping, hiking, wildlife viewing, etc.; 3,8).

Not all EcoS can be maximized in the same place & time, and trade-offs occur when maximizing only one or two EcoS. Some forest EcoS don't require active forest mgmt. but many others do (2,4). Maximizing canopy cover (no mgmt.) will increase local temperature regulation & carbon storage, but at the expense of other services such as wildlife diversity, pest control, bird watching, wild edible plants, & resiliency (active mgmt.; 2,4). Providing multiple EcoS can be accomplished by managing for a diversity of forest attributes across larger forested landscapes, particularly vertical heterogeneity & shrub richness (2,4).

EcoS priorities on public lands depend on the purpose of the owner. In NJ the purpose of state parks is to provide visitors with a variety of recreational opportunities (hiking, biking, camping, swimming, etc.), the purpose of natural lands is to preserve land in its natural state, and the purpose of wildlife mgmt. areas is to manage for a diversity of wildlife species & public access. County & municipal entities may have other goals for forests they own depending on their priorities & that of residents. In NJ, <0.1% of all forests in NJ are being managed annually (10), and <0.5% of those forests are on public lands (FIA 2019), indicating NJ's public forests aren't being managed for all priority EcoS.

Maximizing one EcoS, such as carbon storage, in the majority of public lands will not meet the needs & values of the majority of New Jerseyans - the public holds many different opinions on how forests and wildlife should be managed based on what they value most (3,5,6,7,9). Which EcoS for which parcel of land is unique to that parcel. The general public shares an opinion that our public lands should be managed (3,7). In fact, most wildlife mgmt. area users in NJ, in addition to most of the 20 organizations in a NJ focus group, were in favor of active mgmt. on wildlife mgmt. areas, including wildlife habitat mgmt., Rx burning & timber harvests (9). Legislation should therefore facilitate & promote ecological-based mgmt. of public forests for multiple EcoS, along with the purposes of the owners.

Leslie Sauer

New Jersey Public Forests Climate Emergency Response Management. Prioritize carbon uptake and storage as well as ecological restoration in the management of public forests by prohibiting the removal of wood and forest products.

At this time of an existential climate crisis and threats to biodiversity, the State declares that the management of all public forests shall be documented and monitored to prioritize optimization of carbon storage and ecological restoration. Ecological restoration seeks to initiate or accelerate ecosystem recovery following degradation, damage or destruction. The goal is to return the ecosystem to its historic trajectory (not its historic condition). When forests are allowed to grow without harvesting and wood removal they can achieve their full ecological potential for carbon sequestration (uptake and storage) in wood and soils.

How:

No wood or forest products shall be removed

All woody material shall be left as habitat and carbon sequestered in soil.

Legislation needed to prohibit growing, selling, planting etc. of invasive spp.

Invasive/infected plants/that pose a hazard must be managed on site

Effective deer control is the most needed management

Monitoring all spp., not just forestry info, for baseline and ongoing management

Expand prescribed burning and more natural burn regimen where safe
Manage natural gaps vs cutting mature forest to create them

Benefits:

End unregulated clearing of mature forests/large trees
More climate impact re: carbon than any other action
Avoids major loss of carbon from public lands
Helps to reach the State's goals for carbon reduction
Little economic impact to niche industry; No logging income to DEP
Higher level of fire protection and more pyro-diversity
Sequesters three times the carbon of thinned forest
Increased resistance and adaptation re: pests.
Maintenance of interior forest, the most endangered habitat
Better regeneration with deer control than canopy opening
Greater protection for Special Concern, Threatened and Endangered species
Does not inhibit any needed ecological restoration

The need to act now is overwhelming. We have no time to plan varied treatments for each public forest. No task force member claimed that logging public forests will improve carbon uptake or storage and logging is not needed for ecological restoration. Task Force participants could achieve consensus behind this proposal. Halting all harvesting and removal from all of our public forests can be implemented immediately with no planning time and with instantaneous beneficial impacts. This is doable now!

See attached document concerning ecological management without wood removal.

This proposal is not intended to be retroactive to the Atlantic White Cedar Restoration.

See proposals 27, 28, 29, 35, 36, 37, 52, 65, 66, & 68 for references.

Margaret Wood

Deer Public Forest Management

Deer density has been too high in forests for decades (Ref 1). Over-grazing has decreased forest diversity, causing extinctions.

On Public land, deer resources belong to the public. People want deer to be culled by individual hunters, not businesses or private clubs (Ref 2).

10 deer per square-mile allows for sustainable habitat (Ref 1).

The deer density map shows most of the Highlands, has 15-30 deer/sq-mi (Ref 3), leading to forest degradation. The south-western Highlands is in Hunterdon and Warren with very heavy deer populations.

The eastern Pinelands has 0-15 deer/sq-mi, which is good. The western edge of the Pinelands has 15-30 deer/sq-mi, degrading the forest.

This map is based on "information from state wildlife agencies that generally is estimated from harvest data and deer surveys" (Webb, 2014), reflecting hunt-able land, such as state forests.

Current bag rates reduce the deer population 34%, maintaining current populations. Does breed 2 fawn per year in the forest (Ref 4). Approx. 60% culling, is needed. Hunting is the most economic way to reduce the herds. More people need to be encouraged to hunt. Hunters need incentives to cull more deer, especially Does. Hunters prefer antlered stags, but reducing stags does not slow the birth rate.

Proposals:

1. Increase the season length.
2. Issue permits for multiple zones under one fee.

Hunters sometimes donate deer to charity (Ref 5).

A fixed butcher fee was paid by the State and the meat would go to charity to feed the hungry. Funding was cut. One year, hunters were asked to donate \$25 to the butcher fee, in addition to their labor. Hunters stopped donating and the program died. The charities should be self-funding and worthwhile to the hunter as well as the butcher:

3. Allow a NJ resident with a deer hunting license, to SELL one dressed doe to a charity, at a fixed fee determined by the state. Hunters should be compensated for their expense and labor dressing the deer. Hunters should still be freed of liability when selling to the charity, like they were before. The charity should be allowed to serve the venison at fund-raising dinners. The venue charges a large entrance fee and a portion of that goes to the charity. The charity uses the money for expenses and to buy food for the hungry.

Media:

Hunters have been stigmatized by anti-gun and PETA rhetoric in the media. NJS must reverse that.

4. Run ad campaigns encouraging people to hunt deer for food.

- The book ""An Omnivore's Dilemma" shows that hunting is the most humane way of obtaining meat, (Ref 6) The public should be made aware.
- Deer overpopulation is destroying the natural ecosystem. Hunters re-balance nature.

Margaret Wood

Farmland deer management in peri-urban zones

Deer populations in human occupied zones are increasing (Ref 1). The densest areas are in NNJ along the Delaware River and Hunterdon, where agricultural areas meet suburbs (Ref 2). Deer hide in no-hunt zones during the day, then eat crops at night.

Deer are synanthropes who thrive in peri-urban farmland (Ref 3). A doe births 3 fawns in suburbs compared to 2 in the forest. Populations can double in 3 years. Culling in the forest won't affect farmland deer. "Extreme" deer management plans are needed in these zones (Ref 5).

Animal rights groups request non-lethal control. Neighbors harass those who cull deer. Deterrents don't work long enough to allow crops to grow. Taxpayers won't fund sterilization costing \$1200/doe.

Increased hunting and 7 foot tensile wire fencing are the best methods of reducing farm losses (Ref 1).

Some farms are on leased land where the landowner forbids hunting.

Deer donations to ""Hunters Helping the Hungry"" (HHH) (Ref 4) incentivized hunters to cull these deer. Taxpayers subsidized butcher fees. When money ran out, hunters were asked to pay butcher fees, so they stopped participating.

Don't expect taxpayers or hunters to pay to eliminate losses to farmers. It's the farmers' ""cost of doing business.""

Conclusions:

- Deer hunting regulations need to be different in peri-urban zones.
- Deer culling, for the private gain of farmers, should be self-funded; no tax money.
- To be sustainable, charities like HHH need to generate their own funding to expand the program.
- Don't assume hunters are rich. Make deer culling more affordable.
- Harassment of those who cull deer must stop.

Proposals for dense deer populations in peri-urban zones:

- Issue permits for multiple hunting zones with one fee. Simplify permit process.
- Allow bow hunting from stands, with reduced offsets. Reduce excessive firearm offsets.
- Encourage towns to allow hunting on their vacant and green-space land.
- Require landowners who rent to farmers and receive Farmland Assessment, to allow deer hunting. Landlords may require lead-free ammunition to protect the soil, or demand bow hunting.
- Prioritize farmers with depredation permits, for small business loans, to buy 7 foot tall, high-tensile fencing.
- Charities similar to HHH could host venison fund-raising dinners. Ex: tourist venues near Mountain Creek, Six-Flags.
- Deer eat crops at night. Charities need 24/7 refrigerated vans to pick up freshly dressed deer at all hours.
- Allow hunters on farmland to SELL a large bag-limit of does to charity (free of liability) for a fee, fixed by the state, as is done for butchers in the HHH program.
- The state needs to run ads encouraging people to hunt deer for food.

Michaeline Picaro

Preserve Ramapough Lenape culture

These lands are living creations and places of spiritual ceremony, which our ancestors have created thousands of years ago. Each generation adding prayers (stones) and holding ceremony on each of these sacred sites, teaching our future generations of their homelands and spiritual complexes that exist on these lands today. Asunals (stones) are treated with respect as any elder should be. They are here to assist and provide teachings to us, to ensure spiritual growth, much like Grandparents provide. Our stone creations were/are used for prayers, healing, ceremony and trail markers. Placing a stone (prayer stone) in a specific area, spiritually guided, is an ongoing practice today. Streams above, below ground, are considered spiritual beings and have life. All land is connected, one cannot live without another. Prayers and intention set years ago will be broken, if even one stone is moved. Destroying our ancestors' prayers or ceremonial complexes, will erase our ancestors living culture passed down for generations before, your ancestors stepped foot on our lands. Ceremonial Stone Landscapes were and are another

extended form of our language. Today when we enter the woods, the land speaks to us, allowing the traveler to see the language that was left here by our ancestors. The many different arrangements of these stones indicate direction, with meaning provoking the traveler to follow the code/language of stones, to this day. Language indicating shelter, water bodies, ceremonial complexes, and portals of spiritual worlds of entry. Our living history of Stone Language codes ensured the very survival of our people, providing direction to shelter, water and spiritual access areas for body and spirit. We are the protectors of our living history and culture. We need assistance with preserving this crucial component of our history, language, and culture. Many of these living artifacts remain in place, as they have for over 10,000 years. Our living culture deserves updated policies that state agencies will respectfully adhere to. Provided below is an abridged version taken from Governor Jon Corzine's Executive order #122 "To protect Native American open air worship sites and tribal burial grounds" "and broaden inter-State, State, county, and municipal relations with Native American communities This administration affirms, endorses, and supports the New Jersey Legislature's acknowledgement in 1995 of the major role of the Nanticoke Lenni Lenape Indians, the Ramapough Mountain Indians, and the Powhatan Renape Nation in the history of the State and those tribes' unique and continuing importance in New Jersey's political, social, and cultural life.

Nancy Roberts-Lawler

Fund the Creation & Implementation of Forest Stewardship Plans (FSPs) on Public Lands

Many local governments have taken the opportunity of funding provided by the Garden State Preservation Trust Act (NJSA 13:8C-1 et seq.) and other open space taxes for the acquisition and preservation of properties, mainly for the protection of the natural resources and ecosystem services those forests provide. However, the presence of invasive plants, emerald ash borer, and other threats are prevalent in many areas. Without stewardship activities like the removal of invasive plants, those natural resources and ecosystem services the land preservation was intended to protect will be threatened (1).

Other than raising taxes, many local governments do not have the means to steward their properties despite the need to do so. Governing bodies will likely not volunteer to bear the added cost of having to either create a plan or obtain multiple permits just to control invasive plants in a flood hazard or wetlands transition zone in the Highlands without any compensation or assistance.

An incentive is needed to help public landowners create and implement plans so they can steward their forests for the benefit of the natural resources and ecosystem services provided to the public. There are currently some incentives for having a plan, such as exemptions from needed many of the permits, but it's not enough to offset the cost of creating the plan and then implementing it. If possible, public outreach and education should be included as part of the planning and implementation of forest stewardship.

Available monies to incentivize the creation and implementation of FSPs should be advertised often to local governments. Funding sources could come from Regional Greenhouse Gas Initiative or Green Acres. Compared to the millions of dollars required to purchase land, it would only cost thousands of dollars to plan and conduct stewardship on Green Acres lands. Because land in the Highlands (https://www.nj.gov/njhighlands/master/rmp/final/highlands_rmp_112008.pdf) and Pinelands regions (2) are incredibly important, perhaps public landowners within those boundaries can be eligible for added funding from the Highlands Council and Pinelands Commission for implementation as well as planning.

Nancy Roberts-Lawler

Clarify Forest Stewardship Plan (FSP) regulations and include non-contiguous parcels owned by the same public landowner under one FSP

Public landowners currently follow forest stewardship regulations outlined in NJAC_7:3-5.1-5.14 (1) when developing forest stewardship plans (FSPs) on public lands. Many public entities preserved open space to protect natural resources & ecosystem services such as water quality, recreation, & wildlife diversity. However, the presence of invasive plants, emerald ash borer, & other threats are prevalent in many areas. Without stewardship activities like the removal of invasive plants, those natural resources & ecosystem services the land preservation was intended to protect will be threatened (3). Many public entities prefer the more comprehensive and protective FSP when creating plans to control invasive plants. The criteria for FSPs mandates thorough consideration of multiple resources through the inclusion of soil, topography, hydrology/wetlands, ecology, biodiversity, endangered/threatened species, threats to the forest, carbon sequestration, cultural resources, recreation, fish & wildlife habitat, timber, forest products, and aesthetics in the FSPs (1,2). NJAC_7:3-5.2 also mandates that mgmt. of forests & natural resources under a FSP be based on the principle of conservation, sustains/enhances forest productivity & ecosystem services, & helps keep forests as forests by not allowing clear-cuts leaving <10% canopy except to regenerate a forest (1). We appreciate that these criteria mandate thorough consideration of natural & cultural resources & desire those criteria remain unaltered. Creating a more thorough plan can increase costs but FSPs can save costs from certain regulation exemptions. With FSPs come the cost savings of needing wetland delineations and permits just to remove invasive plants in, for example, a flood hazard area or wetlands transition zone in the Highlands. Allowing non-contiguous parcels to be included under a single FSP would also reduce costs. While FSP regulations do not preclude public lands from the forest stewardship program, they also don't define a publicly held qualifying property. As such, the definition of a single qualifying property that is privately held is being used for qualifying properties that are publicly held. We recommend that a clarifying statement be added to NJAC_7:3-5.1b so single FSPs can apply to non-contiguous parcels owned by the same public entity. This clarification would greatly benefit municipalities who may own a total few hundred acres of forest land but in multiple non-contiguous parcels. The creation of one FSP for multiple parcels, instead of creating multiple FSPs, would reduce planning costs & time investment which will help facilitate the approval for the plans to be developed.

Patricia Shanley, Ph.D.

Public Forests for Public Health

Recent scientific findings confirm that forests are crucial to human health. To realize the health benefits of forests, management plans need to encompass the urgent priorities of planetary and human health. This requires forestry programs to include the nutritional, cultural, ecosystem service values, and human health benefits which forests offer (1). To broaden the lens on forest use and value, this proposal recommends formation of a Forest and Human Health Advisory Committee, including experts from interdisciplinary fields such as: social, urban, and community forestry; infectious and non-communicable diseases; environmental and mental health; climate change; biodiversity; and recreation.

Cross-sectoral collaboration on forests & health is needed because forests:

Enhance immune function: Contact with diverse natural environments enriches the human biome, optimizes the immune system, and protects from allergy and inflammatory disease (2).

Reduce non-communicable disease: & risk factors linked with higher rates of cardiovascular & respiratory diseases, cancers, diabetes & mental health issues, the fastest growing and largest health burdens globally.

Reduce risk of infectious disease: Fragmentation and habitat loss cause increased interactions between pathogens, parasites, bacteria, wildlife and humans, and a rising incidence of infectious diseases, including tick-borne.

Filter & cool air & protect drinking water: Forests reduce pollution-related diseases, including cancers and respiratory illness which annually account for over 100,000 US deaths (3).

Regulate temperature: Heat stress and stroke is rising, but lessened by the cooling effect of trees, which is proportional to the size of the forest patch.

Promote mental health: decrease anxiety, depression, ADHD, and enhance community (4).

The focus of the Committee is to assess the state-of-the-art findings on forests and health relevant to NJ, and to issue a report to the Governor and State Legislature with recommendations incorporating human health into the management of public forests. The committee would include indigenous representation and liaise with the Depts. of Health, Education, Children and Families, Human Services, Mental Health, and Env. Protection. The mandate would be for an initial period of 2 years, renewable as needed. Opportunities to mainstream forests into public health care can occur only through full recognition of the vast public health benefits forests offer.

Sandra Chen

Qualify public forest flora for RAWA funding

Congress is expected soon to enact, with bipartisan support, a law to combat biodiversity loss (1). The Recovering America's Wildlife Act (RAWA) (2) aims to avoid the need to list any additional species as threatened or endangered (T&E), primarily by extending financial and technical assistance to States. Funding levels would increase over time, and ultimately up to \$1.3 billion could be disbursed annually (3,4).

New Jersey (NJ) could receive millions of dollars each year for conservation and restoration of species classified as either i) T&E species or ii) at-risk species, not yet classified as T&E but recognized by the State as a species of greatest conservation need (SGCN). RAWA specifies that SGCNs may be fauna or flora. Anticipating this forthcoming influx of resources, the Task Force should recommend several steps be taken to ensure and enhance RAWA's potential benefit for public forest lands:

1. Revise the State's Wildlife Action Plan (WAP) (5) to include plants. RAWA requires that its monies be used to implement the State's wildlife conservation strategy. NJ's strategy is set forth in its WAP. Trees, shrubs, and understory species (i.e., plants) are essential components of forests. At-risk woodland species merit protection. Currently NJ's WAP currently considers only species of birds, mammal, reptile, amphibian, fish, and invertebrate species as SGCNs—not plants.
2. In the WAP, recognize as T&E species the 356 plants listed as endangered in the Endangered Plant Species Program Rules (6), promulgated pursuant to State law (7). RAWA requires that a State utilize not less than 15 percent of the RAWA money it receives to assist in the recovery of T&E species (8).

3. Consider amending State law to authorize Department of Environmental Protection (NJDEP) to promulgate a list of threatened plant species. Current law (7) only provides for a listing endangered species. But if additional at-risk species (9) could be listed, pursuant to State law, as “threatened,” these species too could qualify for the funding RAWA directs to T&E species recovery.

4. Provide safeguards to protect the habitats in which RAWA-funded conservation measures are carried out. RAWA specifies that conservation programs for SGCNs will also entail recovery and management of the “key habitats” and the “plant community types” essential to the SGCN’s conservation. The welfare of the habitat and the plant community needs to be attended to, as well as that of the target SGCN(s).

Sandra Chen

PROHIBIT CLEARING OF FORESTS FOR INSTALLATION OF SOLAR PROJECTS

Preventing forest lands from being converted to other uses is fundamental to their conservation. Allowing forestland to be cleared for the installation of solar fields is contrary to this aim.

NJ’s Board of Public Utilities (NJBPUB) offers a range of incentives for the installation of solar facilities (1). Agreed, promoting the expansion of solar energy capacity is important for addressing climate change, but it should not be done at the expense of forests.

For larger solar installations (i.e., a grid supply solar facility or a > 5 MW net metered solar facility), Section 6 of N.J.S.A. 48:3-119 establishes siting criteria that NJBPUB must see are met for it to authorize the installation (2). Section 6 contains some acknowledgement of environmental concerns. It states that the siting criteria shall “minimize, as much as is practicable, potential adverse environmental impacts.” But its specifics provide no guarantee of protection of forestlands. There are ambiguities. For example, it states that, in selecting installation a site, consideration is to be given to conservation designations associated with the property and to the amount of its tree cover; but requiring consideration does not establish any ultimate obligation. And such consideration is to be given only “where appropriate,” with no clarity as to what that means. In like vein, Section 6 also prohibits siting large installations on land preserved under the Green Acres Program, on land in the Pinelands and Highlands preservation areas, and in freshwater wetlands and lands defined as “forested lands.” Then, a subsequent provision establishes that a “developer may petition the board for a waiver” to these prohibitions.

For smaller solar installations (<5 MW) (3), State law does not provide any siting criteria. In a draft of proposed amendments to its existing solar energy rules for these smaller installations, NJBPUB states: “Although the proposed rulemaking does not establish specific siting standards, existing statutes and regulations implemented by other New Jersey state agencies will continue to apply to siting on...sensitive natural environments.” (4) But there are no other-agency regulations protecting forests from being cleared for a solar project.

New State law is needed which prohibits the clearing of public forestlands to make way for solar power installations.

Sara Webb

Retain Wood for Climate and Biodiversity

To maintain and increase climate resilience and safeguard biodiversity, there shall be no sale or removal of wood or timber products from New Jersey’s public forested lands. With this major policy change, all

woody material will be left in the forest for habitat and as carbon sequestered in soil. Standing dead trees, dead wood and logs shall be retained on site: for their critical habitat value, for organic matter to create and replenish topsoil, for climate defense through carbon storage, and to prevent ecological damage from logging machinery to soil, vernal pools and other habitats. Invasive non-native woody plants and those that pose a genuine hazard must be managed on site rather than moved and disposed of elsewhere. Logs, snags, and stumps are mostly carbon, and as they decompose most carbon moves into soil, beneficial fungi, and the entire food web. Retaining wood and living trees is essential to meeting the NJ State Forest Action Plan goals (Plan, p.145) "to enhance carbon sequestration, and prevent our forest resources from becoming a net carbon emitter." With these goals in mind, wood must remain in the forest and living trees also retained for continued carbon sequestration services.

Despite claims that logging does not sacrifice carbon defense because wood products also store carbon, wood products actually have a surprisingly short life span (Ref 1), and a very high percentage of trees' carbon storage is released through processing, milling, transportation, and production (Ref 2). When used as or converted to fuel products, logged timber biomass rapidly converts to CO₂ in the atmosphere. But left unlogged, native forest species of our state will live for centuries of accelerating carbon sequestration and storage as they grow (Refs 3& 4)

Many species rely on dead wood or related complexity of forest floor habitat: dead tree and cavities for bird habitat, nurse logs for tree seedlings, wood for high diversity of fungi which are globally threatened by tidy habits. In addition to loss of carbon and habitat, we have seen that today's mechanized timber management and transport on New Jersey conservation lands erodes and compacts soil, spreads invasive species; and harms public water supplies, vernal pools and other wetlands, amphibians, understory plant communities, and the future forest of young trees.

This proposed policy of wood retention for climate defense and wildlife also would reduce financial incentives for cutting trees and clearing the forest canopy. Other sources of funding not tied to wood harvest must be developed to support the NJ DEP's important conservation work to enhance climate resilience and forest integrity.

Sharon Wander

Protect Nesting Habitat for Forest-Interior Breeding Bird Species on Public Land in New Jersey

Much of the justification offered for logging of NJ public forests has been to create early successional/young forest habitat (ESH) for birds, attributing population declines of ESH-breeding birds to lack of this habitat type^{1,2}. However, clearing mature forests does much more harm than good to birds of NJ. Since 1970, Eastern Forest bird populations have declined by 166 million, with 63.5% of species exhibiting losses³, including 31 of New Jersey's 59 forest bird species⁴. Of NJ forest birds, 2 are State Endangered (E), 2 are Threatened (T), and an alarming 21 are Special Concern (SC)⁵. ESH bird species include 3 E, 1 T, and only 4 SC⁵. Obviously, forest-breeding birds need at least as much habitat protection as ESH species. It makes no sense to log the decades-old habitat needed by one group of declining species to create, for another group, habitat of short-lived effectiveness (the number of species using ESH created by logging at Sparta Mtn. WMA starts to decline after only 3-4 years⁶). Further, many NJ forests are so severely degraded they cannot support the normal complement of breeding birds. Overabundant deer have greatly impacted the species composition and abundance of forest understory vegetation in central NJ⁷ and "pose a significant threat to forest health and plant regeneration throughout [NJ]"⁸. The resultant loss of cover, nesting sites, and food sources, combined with effects of invasive plant species on vegetation structure, has reduced abundance of ground- and

midcanopy-nesting forest birds in NJ. So, with forest-breeding birds facing habitat losses at least as serious as those of ESH-breeding species—and with many more Species of Concern involved—further conversion to ESH of forest nesting habitat must be restricted—particularly when NJ owns thousands of acres of open fields (notably on WMAs) where ESH could be created relatively quickly. Also, some 950,000 acres of forest in NJ is privately owned⁸ and ESH is likely being created on much of this acreage through Forest Stewardship Plans.

Therefore, management activities on publicly owned forests in NJ that would temporarily or permanently reduce the area of nesting habitat for forest-interior breeding birds should be restricted. Any management to create ESH by mimicking natural disturbance within maturing forests (both for ESH-breeders and to provide habitat heterogeneity for forest breeders) must be small-scale (suggested ≤ 3 acres), implemented without the use of heavy machinery, and not involve killing of large trees or removal of wood (unless to another part of the forest). Details of such restrictions to be determined by a scientific advisory board (See proposal #68).

Silvia Solaun

Mgmt of Public Lands Must Be Held To Highest Standards

Management of our public forested lands must be held to the highest standards known for Ecological Health.

The majority of our public forested lands have been acquired through public funding including Garden State Preservation Trust Funds and the Green Acres Program. These lands are now held in the Public Trust.

In order for our public forests to fulfill their Public Trust obligation and serve the public by protecting ecological diversity, no heavy logging equipment, such as feller bunchers, skidders, harvesters, logging trucks or other heavy machinery should ever be used on public forest lands. "Habitat disturbance and land use intensification are the principle drivers of global biodiversity loss in terrestrial ecosystems."¹ The use of heavy machinery on NJ's public forested lands has caused severe soil compaction, soil degradation and extreme rutting in all of the previously logged areas, e.g., Sparta Mtn. (SMWMA) is an example of what NOT to do. (See photos) Soil impacts damage adjacent trees, native vegetation, mycorrhizal systems, and lead to erosion and impair surface water quality.

Use of heavy equipment causes severe negative impacts to sensitive and Rare, Threatened & Endangered vernal pool species (amphibians: salamanders, frogs, toads). Huge heavy equipment permanently widens historic dirt forest roads and encourages ATV/ORV use, which severely degrades our public forest lands' ecological resources.

Finally, heavy equipment brings with it the likelihood/certainty of infection of invasive species not previously infected with them. In addition to bringing invasive seeds in on the vehicles, the massive soil upheaval inflicted by the heavy equipment alters the pH of the soil to a level preferred by non-native species, eg. Japanese stilt grasses, knotweed, barberry & mugwort.

New Jersey's existing Best Management Practices (BMPs) are outdated, grossly inadequate and should not apply to our public forests. Our public forests deserve better! No heavy logging equipment belongs on NJ's public forests.

Below are images from Sparta Mtn. that serve as visual testimony to "What should not occur on NJ public forested lands.

Sparta Mtn. WMA Forest Mismanagement and Why Our Public Forested Lands Deserve Better!

Silvia Solaun

Highest Standards should be employed on our forested public lands

Management of our public forested lands must be held to the highest standards known for Ecological Health.

The majority of our public forested lands have been acquired through public funding including Garden State Preservation Trust Funds and the Green Acres Program. These lands are now held in the Public Trust.

In order for our public forests to fulfill their Public Trust obligation and serve the public by protecting ecological diversity, no heavy logging equipment, such as feller bunchers, skidders, harvesters, logging trucks or other heavy machinery should ever be used on public forest lands. "Habitat disturbance and land use intensification are the principle drivers of global biodiversity loss in terrestrial ecosystems."¹ The use of heavy machinery on NJ's public forested lands has caused severe soil compaction, soil degradation and extreme rutting in all of the previously logged areas, e.g., Sparta Mtn. (SMWMA) is an example of what NOT to do. (See photos) Soil impacts damage adjacent trees, native vegetation, mycorrhizal systems, and lead to erosion and impair surface water quality.

Use of heavy equipment causes severe negative impacts to sensitive and Rare, Threatened & Endangered vernal pool species (amphibians: salamanders, frogs, toads). Huge heavy equipment permanently widens historic dirt forest roads and encourages ATV/ORV use, which severely degrades our public forest lands' ecological resources.

Finally, heavy equipment brings with it the likelihood/certainty of infection of invasive species not previously infected with them. In addition to bringing invasive seeds in on the vehicles, the massive soil upheaval inflicted by the heavy equipment alters the pH of the soil to a level preferred by non-native species, eg. Japanese stilt grasses, knotweed, barberry & mugwort.

New Jersey's existing Best Management Practices (BMPs) are outdated, grossly inadequate and should not apply to our public forests. Our public forests deserve better! No heavy logging equipment belongs on NJ's public forests.

Below are images from Sparta Mtn. that serve as visual testimony to "What should not occur on NJ public forested lands."

Sparta Mtn. WMA Forest Mismanagement and Why Our Public Forested Lands Deserve Better!

Timothy McKenna

NJ Public Forests, Undisturbed by Tree Removal or Logging, Best Serve the Public

The New York-New Jersey Trail Conference proposes that there be no sale or removal of wood or timber from New Jersey's public forested lands. As other well-researched and data-supported proposals to the Task Force will state, prohibiting the sale or removal of wood or timber will preserve the forests in the optimum state of health and maintain and increase their resilience and biodiversity. In addition,

prohibiting the sale or removal of wood is crucial to preserve the beauty of the forests and, as our Trail Conference mission defines, "ensure that the trails and natural areas we share are sustainable and accessible for all to enjoy for generations to come."

Mature forests are the healthiest forests. As other proposals to the Task Force will attest, mature forests have a remarkable natural ability to care for themselves while fostering flora and fauna diversity and clean air and water. The value of mature trees as among the world's best carbon sinks is well-established in scientific literature.

The work of the Trail Conference's Ecological Stewardship team further informs our opposition to any clear-cutting or wood removal. As part of the invasive species monitoring, removal, and treatment work we undertake, we are well-acquainted with the invasive species and uncontrolled deer populations doing unprecedented damage to native flora and fauna. Commercial forestry practices and the disturbance they entail can accelerate this damage.

In addition to ecological health, the value of public access and enjoyment cannot be overlooked in stewardship discussions. The state is small and the most densely populated in the nation, and the benefits of having the natural beauty of public lands open to New Jersey residents should not be minimized. These forests, and the hiking trails the Trail Conference maintains, offer the joy and restorative power of nature to everyone regardless of age, ability or location. Visit any of our trails on a weekend and you will see people of all backgrounds and experience levels making the best use of nature and representing the diversity that thrives in New Jersey. The clear-cuts and road-building that come alongside commercial timbering do irreparable damage to these important recreational amenities and areas of natural beauty.

We are in a region with huge concentrations of housing, business and infrastructure. In this region to set aside our public forests for the good of the public is a necessary step to benefit generations to come. Our public, which includes all of the state's residents, would be appalled by any actions that would mar the extraordinary vistas of our state's Highlands that these forests provide."

Appendix E-6

Other Proposals

Proposals that were submitted and reviewed by the co-chairs but where revisions were needed or there was not at least three of four cochairs accepting or rejecting them These proposals were not discussed by workgroup participants. There were 40 proposals in this category (one was submitted and revised).

Narratives were limited to 2500 characters. Proposal sponsors were invited to also submit references, which are not included here due to space limitations but are available using the sponsor's citation(s) when provided. Footnotes in the proposals indicate a reference to an article, file, memo, or other document. Note that references submitted ranged from unpublished opinions, magazine and news articles, webinars, and journal articles (some peer-reviewed and some not peer reviewed).

Angi Metler (Susan Russel)

First, stop the harm.

Reverse systemic game management ("young forests") for wild turkey, non-native and captive-raised ring-necked pheasant, partridge, bobwhite quail and cottontails. These landscapes yield more deer.

Angi Metler (Susan Russel)

Process, conflicts, pre-determined, weighted votes

Several participants have raised concerns about conflicts of interest. We've been meaning to go on record regarding same. The forestry task force will lead to a pre-determined outcome and recommendations to the Legislature. Three of the four co-chair groups – New Jersey Audubon, New Jersey Forestry Association, and New Jersey Conservation Foundation—pursue, engage in and/or financially benefit from logging or tree killing (girdling), burning, and forest management services and regimes. All three subscribe to theories predicated on perpetual baiting and killing of deer. Task force leadership (unelected) is remarkable given the demonstrated unpopularity of logging briefs within the state's environmental and grassroots community. For ten years, New Jersey Audubon and the New Jersey Forestry Association have lobbied for legislation to advance logging and destroy more deer. The New Jersey Conservation Foundation argues for a return of market hunting and the destruction of "80 to 90 percent" of the state's deer herd. New Jersey Audubon's lobbyist is a co-chair of the task force. Among the rules laid down for participants: a gag order; no blogging, no speaking with the press. Votes will be "weighted based on conservation knowledge" – as determined by the co-chairs. For ten years, at co-chairs' behest, task force creator Senator Bob Smith has introduced legislation to promote logging and expand deer killing methods used by poachers – jacklighting, shooting from vehicles – to forested lands. In each session, the legislation failed. In his former position as New Jersey Audubon's vice-president for stewardship, John Cecil was the state's chief proselytizer for timber operations and Audubon's related "active" management business. In fact, Mr. Cecil dismissed proforestration as "a political movement.

Angi Metler (Susan Russel)

Stop food plots, crops, and cuts that breed deer

Cease managing leased or owned stewardship land expressly for white-tailed deer via food plots, crops, and cuts. <https://deerassociation.com/manage/food-plots/>

Angi Metler (Susan Russel)

Ban baiting

Of major import is a statewide ban on bait for deer and black bear. Bait increases density, reproduction, conflict, and predation of ground-nesting birds. It drives transmission of disease. New York and Pennsylvania don't allow it.

Angi Metler (Susan Russel)

Fertility Control

Surgical sterilization has significantly reduced local deer populations in Virginia, California, Michigan, New York, Ohio, and Maryland. While fertility control may not be suitable for every site, it is demonstrably viable and safe in appropriate settings which can include open populations. Fertility control needs to be made available in New Jersey. The key to fewer deer is lower fertility. Hunting does not reduce fertility in individuals; it either stabilizes higher breeding rates, or as recorded in New Jersey, increases fertility by improving habitat. Lethal removal will always require more killing. Controlled hunts spanning decades in New Jersey, with little or no change in forest regeneration or collisions, self-evidently sustain annual hunting.

Angi Metler (Susan Russel)

Reforestation

Intact, mature forests mean fewer deer and are home to many other species of no less value than warblers. Others will address the host of ecological and climate benefits conferred by intact forests. Where practicable, allow and develop policy to encourage and protect regrowth.

Anne Soos

Proposal: Planning, Planting, and Maintaining Urban Forests "Proposal: Planning, Planting, and Maintaining Urban Forests

Many recent studies have shown that urban areas with lower-income residents, are especially prone to severe heat island effects. This is when, due to the large amount of dark, impervious surfaces, ambient temperatures are significantly higher than in other areas of a city. Due to re-radiation after sunset, these areas also remain excessively hot during the nighttime hours as well. Increased temperatures have been linked to higher mortality rates, as deaths rise significantly during heat waves, especially in these areas.

Green spaces, or urban forests have been shown to significantly reduce the heat island effect. Trees can also act as wind breaks and make cityscapes less cold during winter months. An urban forest can be as simple as tree canopies planted and maintained along streets, or larger areas such as parks or building lots where structures have been abandoned and demolished. Areas along rivers and streams are especially suitable for trees, for then channelized rivers can be converted to a more natural landscape. A park planted with flood-tolerant trees and shrubs can provide cooling as well as flood control and ground water recharge.

Reducing ambient temperature has several obvious advantages: it decreases energy use and therefore carbon dioxide emissions as less AC is needed in summer, and heat in winter. With lower summer temperatures, death rates decline. Studies have also shown that areas with trees have positive

psychological effects for residents. The reason that urban forests are so good at temperature control in the summer is evapotranspiration. Soil can evaporate water back into the atmosphere, lowering the temperature. In addition, the leaves on plants release water in a process called transpiration. Trees planted and maintained in urban areas can sequester carbon dioxide as they photosynthesize. Plant roots can also absorb water, decreasing the amount of runoff and flooding associated with the large amount of impervious surfaces associated with urban areas.

This proposal directs the State of NJ to devote funding to developing, planting, and maintaining urban forests, through the following five steps.

- 1) Using temperature data widely available to locate urban areas within the state which have especially pronounced heat island effects
- 2) Developing specific plans for each of these areas on how to best implement an urban forest.
- 3) Providing funds to municipalities to purchase land deemed appropriate for an urban forest.
- 4) Initiating a tree planting program
- 5) Initiating a maintenance program.

It is crucial to involve community residents in this process.

Cameron McKenzie

Urban Forest Stewardship in Underserved and Overburdened NJ Communities

Forest stewardship is a critical infrastructure¹ for natural resource management, especially within the most densely populated state (NJ) in the nation's most densely populated metropolis. At a national and state level, existing forest stewardship programs and policies are ineffective at meeting the growing needs of forest landowners, especially those with smaller land holdings in urban areas. This is evidenced by nominal participation of eligible forest landowners in the U.S. Forest Stewardship Program (i.e., less than 2% of all eligible forest landowners in the state of Minnesota) and the existence of socioeconomically exclusionary minimum land holding requirements for participation in this program across many U.S. states^{2,3}. This also suggests that most stewardship on private forest lands is occurring outside governmental supervision². This is no surprise, considering environmental governance has shifted over the last century from state-dominated management to an expanding role of civic society in the management of natural resources⁴. Now more than ever, stewardship is the responsibility of many (individuals, NGOs, environmental commissions, non-profits etc.)⁵. However, the forest stewardship needs of many communities, including the Environmental Justice Communities identified by the NJDEP⁶, are often overlooked by existing urban stewardship networks. Recent studies on urban stewardship networks have shown that resources are disproportionately allocated near existing environmentally-focused institutions and therefore often outside of the "stewardship deserts" that need these services the most.⁷ Expanding urban forest stewardship networks across NJ's underserved communities is therefore a priority for the management of urban forests, particularly in a time of climactic change, epidemiological disruption, and rampant environmental injustices. Urban stewardship can be a powerful tool for (1) education of the future generation of environmental leaders from underserved NJ communities (2) a means of nurturing climate resilient, disease-mediating, equitable urban forests (3) citizen science for the long-term monitoring of the ecological health of urban forests and (4) an outlet for biocultural stewardship within communities that form personal connections between their culture and the environment.⁸

Chief Vincent Mann

Preserve Ramapough Lenape culture - Respect our Relations

All lands in New Jersey are originally the lands of our ancestors. However, taken from us, the land deeds that our grandparent Sachems signed, whether coerced, or cheated, they had the wisdom to reserve for us the rights “to hunt, to gather, to strip bark from trees”. We call upon the stewards of New Jersey’s public lands—which have a special significance because they embody the public trust that we, the indigenous peoples have valued all lands, whether public, or private—to respect our reverence for the earth, the trees, the plants, the waters, as living creatures and that the forests of New Jersey are our open-air worship sites. We, the Turtle Clan of the Ramapough Nation, the descendants of the Munsee speaking people from the north of the Raritan River, call on you to recognize the rights reserved for us by our ancestors when our lands were taken. By that recognition, we ask that the trees in public forests are accorded the respect of a living person, as our cousins, or grandparents. They may willingly give of themselves, as we would give of ourselves, as our Mothers would give to sustain her children. The oak in the forest, she gives freely of her acorns, to sustain many of her different children that gather her nuts, including we who make flour. But she gives her acorns only after she has lived in the forest for 50 years, reaching her peak at 120 years. All trees of the forest are thus providers and when you cut them you destroy our living relations. We ask that you grant this provision per Nature’s Bill of Rights and Governor Jon Corzine’s Executive order #122, which remains in effect, “To protect Native American open air worship sites and tribal burial grounds” “and broaden inter-State, State, county, and municipal relations with Native American communities This administration affirms, endorses, and supports the New Jersey Legislature’s acknowledgement in 1995 of the major role of the Nanticoke Lenni Lenape Indians, the Ramapough Mountain Indians... in the history of the State and those tribes’ unique and continuing importance in New Jersey’s political, social, and cultural life.

Dawn Riley

Actionable Data and Tools to Improve Forest Management

Forests play a critical role in mitigating climate change through biologic carbon sequestration. While trees can reduce the negative impacts of climate change, forests are susceptible to climate stressors and require forestry management to grow and thrive. Decisive forest management actions are necessary to maintain and enhance the forest carbon sink.

According to the NJDEP’s 2018 Greenhouse Gas Inventory, the NJ state land sector sequesters nearly 8% of the state’s overall greenhouse gas emissions. Enhanced forest management practices on public lands with a focus on atmospheric carbon storage could significantly increase the ability of NJ forests to offset greenhouse gas emissions in the state. Consideration, however, must be given to the balance of forest values and the detrimental impact to biodiversity with a long-term focus on maximizing carbon sequestration. Species diversity is a critical component in decreasing the negative impacts of climate change.

Most practices are already part of existing proper forest management activities, it is a matter of ensuring the most purposeful and beneficial practices are being operationalized based on the landscape. Forest managers need access to data and the understanding of greenhouse gas emission evaluations and carbon accountings to improve carbon sequestration. To achieve this, the NJDEP would require resources to acquire and process real-time data through periodic and continuous measurements and a structured program to provide this information to trained natural resource managers, planners and forest managers to inform their actions. Data should also be publicly available in both raw and summarized formats. In addition, tools are needed to assist in the identification of the type of forest being managed based on tree species and geographic conditions, as well as the most ecologically appropriate species for reforestation and afforestation.

Forest management planning should be transparent, based on data and with ample public input opportunities. The planning should have long-term goals and perspective, with milestones and follow

an iterative process. Data and forest management activities should be coordinated with land managers in adjacent states and within the state with federal land managers, county, municipal and public entities. Healthy forests store and sequester significantly more carbon than degraded forests. Through focused forest management practices based on actionable data and the tools and knowledge to best manage our forests and public lands, NJ can improve the ability to offset greenhouse gas emissions and prepare our state to be more resilient to the impacts of climate change.

Forests play a critical role in mitigating climate change through biologic carbon sequestration. While trees can reduce the negative impacts of climate change, forests are susceptible to climate stressors and require forestry management to grow and thrive. Decisive forest management actions are necessary to maintain and enhance the forest carbon sink.

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Dawn Riley

Operationalizing Carbon Offense Strategies

NJDEP must be tasked to operationalize their carbon offense strategies through existing natural resource managers, planners and forest managers. NJDEP needs to create a forest management framework including all NJ public lands and the tools to assist forest managers in the implementation of these strategies. The tools need to provide guidance on the most ecologically appropriate species for reforestation, afforestation and restoration with a focus on carbon sequestration and climate resiliency.

With the decrease in the number of NJDEP staff and the state's appropriations for direct state services remaining flat (when adjusted for inflation amounting to about 60% of funding in 2005) this means an operating model change. Continuing to allocate resources to generate reports on what needs to be done and managing support through previous outdated processes will not create the change needed.

The proposed deliverables can be leveraged from existing work by the Natural Areas Conservancy (NAC) in partnership with the New York City Department of Parks and Recreation (NYC Parks). NAC has created a Forest Management Framework for the restoration and maintenance of NYC Parks and produced data on the health and condition of NYC natural areas.

<https://naturalareasnyc.org/content/forests/fmf-2019-update-singles.pdf>

NAC has also released FIRST: Forest Identification and Restoration Selection Tool using data from the Ecological Assessment of New York City's natural areas, and tree species climate adaptation data from the USDA Forest Service Climate Change Tree Atlas to assist users in identifying the type of forest they are managing and providing guidance on appropriate tree species. <https://naturalareasnyc.org/climate>

Doris Lin

Game management

Prohibit systemic game management ("young forests") for wild turkey, non- native and captive-raised ring- necked pheasant, partridge, bobwhite quail and cottontails. These landscapes yield more deer.

White-tailed deer have not exceeded biological carrying capacity in almost all of NJ, but may have exceeded cultural carrying capacity, which leads residents to call for deer hunting. Because of cultural carrying capacity, LOHVNJ objects to management practices that increase the deer population.

Doris Lin

Stop management of state lands for increase in deer population

Prohibit managing leased or owned state lands expressly for white-tailed deer via food plots, crops, prescribed burns, and cuts. White-tailed deer have not exceeded biological carrying capacity in almost all of NJ, but may have exceeded cultural carrying capacity, which leads residents to call for deer hunting. Because of cultural carrying capacity, LOHVNJ objects to management practices that increase the deer population.

Diets, Movements, and Consequences of Providing Wildlife Food Plots for White-Tailed Deer in Central North Dakota

<https://www.jstor.org/stable/4496393>

<https://www.southernnewjerseygdma.com/adopt-a-food-plot/>

Doris Lin

Ban baiting and feeding of deer and bears

Ban baiting for deer and black bear. Bait increases density, reproduction, conflict, and predation of ground-nesting birds. It drives transmission of disease. New York and Pennsylvania don't allow it. White-tailed deer have not exceeded biological carrying capacity in almost all of NJ, but may have exceeded cultural carrying capacity, which leads residents to call for deer hunting. Because of cultural carrying capacity, LOHVNJ objects to management practices that increase the deer population.

Doris Lin

Prohibit logging on state lands

Reforestation. Prohibit logging on state-owned lands. Intact, mature forests mean fewer deer. Others will address the host of ecological and climate benefits conferred by intact forests. Where practicable, allow and develop policy to encourage and protect regrowth.

Logging creates the edge habitat preferred by deer and will increase the deer population. White-tailed deer have not exceeded biological carrying capacity in almost all of NJ, but may have exceeded cultural carrying capacity, which leads residents to call for deer hunting. Because of cultural carrying capacity, LOHVNJ objects to management practices that increase the deer population.

<https://extension.missouri.edu/media/wysiwyg/Extensiondata/Pub/pdf/agguides/wildlife/g09494.pdf>

Elaine Mann

Handbook Tiny Forests Planting method.

I have been reading material on two remarkable men. Mr. Miyawaki and Mr. Sharma. While reading through the material it dawned on me that perhaps we should adopt their methods. Their methods have been a proven success. Sharma/ interview by s around the world.

The Miyawaki Method: A better way to build forests. His very particular approach to afforestation a soil, air, water and climate remediation process.

Mr. Sharma applied the above method to a tract of land around a Toyota factory where he worked.

He quit his job at Toyota and opened a forest production company named Afforestt.

Handbook Tiny Forests Planting method, it provides a step by step instructions.

I think we can model the Miyawaki-Sharma methods to our project recommendations and prove successful.

Toyota provided some of the capital to create the forest around the plant.

With the help of land developers and major corporate and government investment we can achieve our goal.

World EconomicForm, July 3, 2020, Alex Thornton Senior Writer

Leda Nargi (<https://daily.jstor.org/dily-author/leda-nargi/>)

<https://blog.ted.com/shubhendusharma/> interview by Ted Fellow.

The best source;

IVN Natuureducatie

Elliott Ruga

Forest management activities on public- and non-profit-owned lands are not exempt from the Highlands Act, Freshwater Wetlands regulations and Flood Hazard Area Control Act regulations

New Jersey lacks regulations specifically designed for managing public forests. Instead, rules developed for privately owned forests are being applied to public forests where they are inadequate in protecting the public's interests and in addressing the threats to these forests. The Woodland Management Plan program under Treasury at NJAC 18:15-2.10 and the NJ Forest Stewardship Plan program under DEP at NJAC 7:3-5 were promulgated to discourage the conversion of private lands to development by setting forth criteria to qualify for a tax break. The objectives of both these programs are limited to what standards could be adopted by a property owner in exchange for a tax incentive. On the other hand, the procedures and standards for forest stewardship for public lands need not be limited by a quid pro quo, they should be solely based on protecting the highest values that represent the public's investment in the forest's resources.

Similarly, exemptions to Wetlands Rules, the Highlands Act and Flood Hazard Area rules facilitate participation by the private forest owner. Exemptions also insulate New Jersey's land use regulations from claims of regulatory takings of property. But on publicly owned lands property rights concerns are inapplicable and incentives are unnecessary.

The argument that forest management is not permanent development thus should not be subject strict application of land use rules does not account for the impacts from mechanized logging, which are devastating to sensitive ecologies, they provide footholds for non-native species invasions, they destroy occupied habitats, and they disrupt hydrologic flows.

In the New Jersey's Flood Hazard Area rules, which implement a riparian zone, forestry activities are exempt if the New Jersey Forestry and Wetlands Best Management Practices Manual is followed. That manual hasn't been updated since 1995, pre-dating current Wetlands and Flood Hazard Area rules, pre-dating contemporary science and understanding of the functional values of wetlands and riparian zones and the entire context of a climate change.

(Documentation cited below clarifies that mechanized tree harvesting on public lands is inconsistent with NJ's wetlands and flood hazard rules and thus not entitled to exemptions).

Greg Gorman

Categorize Carbon Management Strategy

The USDA designed "Adaptation Strategies and Approaches" specifically for forest carbon management and draws direct connections between climate adaptation and mitigation (Ortl, Todd A. et. al, January 2020). (Stewardship2) In developing the Forest Stewardship Plan, the State approved consulting forester (Stewardship4) shall perform a climate vulnerability assessment of each forest stand using USDA's "Adoption Workbook" and select an appropriate carbon management strategy/approach from Table 1. "Menu of adaptation strategies and approaches for forest carbon management" on p. 89 of Ortl et. al, January 2020. (Stewardship1 & 3) A forest stand is a contiguous community of trees sufficiently uniform in composition, structure, age, size, class, distribution, spatial arrangement, site quality, condition, or location to distinguish it from adjacent communities. The Adaptation Workbook can be found in the US Forest Service report: Forest Adaptation Resources: Climate Change Tools and Approaches for Land Managers (Swanson, Christopher W. et.al. September 2016). (Stewardship5) The Forest Stewardship Plan shall identify the selected climate adaptation/mitigation strategy for each forest stand and describe the appropriate management prescriptions to achieve the desired carbon management objectives. NJ DEP State Forester shall develop a means of oversight and monitoring execution of the plan.

Greg Gorman

Categorize Climate Adaptation Strategy

In developing the Forest Stewardship Plan, the State approved consulting forester (Stewardship4) shall perform an ecological vulnerability assessment of each forest stand using USDA's "Adoption Workbook" and select an appropriate climate adaptation management strategy/approach from Box 18 "Menu of Adaptation Strategies and Approaches" on p. 139 of Swanson et. al, September 2016. (Stewardship 6) A forest stand is a contiguous community of trees sufficiently uniform in composition, structure, age, size, class, distribution, spatial arrangement, site quality, condition, or location to distinguish it from adjacent communities. The Adaptation Workbook can be found in the US Forest Service report: Forest Adaptation Resources: Climate Change Tools and Approaches for Land Managers (Swanson, Christopher W. et.al. September 2016) (Stewardship5). The Forest Stewardship Plan shall identify the selected adaptation strategy for each forest stand and describe the appropriate management prescriptions to achieve the desired carbon management objectives. NJ DEP State Forester shall develop a means of oversight and monitoring execution of the plan.

Gwen Macchione

Cap and Trade Carbon Market

Proposal is too long for the character limit. I will upload the file with the complete proposal below.

Jim Lyons

Guiding Principles for Managing NJ Forests for Ecological Integrity and Climate Resiliencer

Key Concepts for Managing NJ Forests for Climate and Biodiversity

John A. Thonet

The New Jersey Forest Task Force should make certain factual acknowledgements and findings to the New Jersey State Legislature prior to even beginning its efforts to propose appropriate forest stewardship / management regulations and policies for publicly-owned forest lands.

The NJ Forest Task Force should commit to making the following basic acknowledgements to the NJ State Legislature prior to even beginning its important work involving proposing appropriate forest stewardship / management regulations and policies for publicly-owned forest lands:

(i) Acknowledge and inform the NJ State Legislature, that New Jersey's existing Forestry rules at NJAC 7:3, address only forestry activities proposed on privately-owned forest lands. Simply put, no Forestry rules currently exist for publicly-owned forest lands.

(ii) Acknowledge, and inform the NJ State Legislature, that the New Jersey Forestry and Wetlands Best Management Practices Manual is over 26 years old and provides recommendations that are today, inconsistent with other current NJDEP regulations. Accordingly, this existing BMP Manual would need to be updated and revised in order to be utilized as a BMP manual for forestry-related activities on either privately-owned or publicly owned forest lands;

(iii) Acknowledge, and inform the NJ State legislature, that the New Jersey Green Acres Program Rules at NJAC 7:38 provide forestry-related regulations concerning certain publicly-owned forest lands, which at the present time are not being enforced by the NJDEP.

(iv) Acknowledge and inform the NJ State Legislature, that any forest stewardship / management regulations and policies for publicly-owned forest lands should be different from regulations for privately-owned forest lands, since specific goals and objectives for managing forests on public and private forest lands are different.

(v) Acknowledge and inform the NJ State Legislature that qualified professionals such as, but not limited to ecological restoration consultants, civil engineers, land surveyors and environmental consultants, should be authorized and required, as necessary, to participate in the preparation of all forest stewardship plans, woodland management plans, or forest management plans, in addition to "foresters."

[Supporting documents include: (i) Preliminary Report and Appendices A and B, regarding New Jersey Regulations and Policies Governing Forest Management Activities, and (ii) Preliminary Analysis and Report on New Jersey's Green Acres Program, with regard to Forestry-Related Activities, both prepared by Thonet Associates, Inc., on behalf of the New Jersey Highlands Coalition, dated December 28, 2021 and March 4, 2022, respectively.

Katherine Evans

Enhance protections for critical habitat/amphibians for ecosystem services

Amphibians are likely the most overlooked contributors to overall forest health. Their vernal breeding pools and their associated upland forest habitat are interdependent. They maintain soil structure and pH, control algal biomass and play critical roles in food supply and nutrient cycling. Salamanders sequester vast amounts of carbon in the soil. The strength of amphibians is in their numbers, and this density must be maintained in order for these services to be effective. (1,2,3,4)

Though the focus is usually on the breeding pools, it is in the surrounding upland forest where they spend most of their lives performing the majority of these services. This is why, as already established based on decades of science, amphibians require a vernal pool buffer of 1000 ft (N.J.A.C. 7:7A-1.4), with

some species requiring a greater distance. (The wood frog migrates well over that distance and spends 11 months in upland forest habitat.)

Forest management should not be exempt from 1000 ft vernal pool buffers as is the case in the Highlands Act, for example, in which these buffers apply only to development. In the case of critical habitat in our public forests, the need for 1000' buffers should be obvious if this "stewardship" is truly for "ecological health" as is claimed. The soil compaction, rutting, temperature increase and alteration to water flow caused by canopy removal and heavy logging equipment is extremely damaging to vernal pools and upland habitat. While it is argued that the ground is frozen when logging occurs, this is not always the case and heavy equipment collapses overwintering burrows regardless. Amphibians are affected in body composition and size, egg nutrition, mating ability, migration ability and overall survival.(5)

As it stands, with insufficient buffers, we protect only the breeding pools to which amphibians return to breed for about a month or so, while degrading the upland habitat in which they spend the other 11 months and make vast contributions to forest health and carbon sequestration. No use of heavy equipment/extraction of timber should occur. Only girdling and removal of invasives (cutting in the case of ailanthus, etc.) should be considered within 1000 feet. Vernal pools AND their 1,000 ft buffers are considered "critical habitat" in the state of NJ and should be protected accordingly.

Ken Dolsky

Proposal to Introduce Wolves to Deal with Deer in NJ

The need for improved and effective deer management is clearly one of the most likely areas for consensus on the NJFTF.

Solutions to the deer problem are challenging. Major obstacles include the high cost and effort required for fencing, small number of hunters, limited-length hunting seasons and the need for a law that would allow a market for deer meat. Wolves solve all these problems. Wolves require minimal expense – only the capture and importation costs (which might be shared by Western states anxious to reduce their wolf populations). Wolves hunt year round so there is no need for a hunting season. The substantial number of deer will provide plenty of food so that wolf populations will increase greatly over time and there will be no need for a market for deer meat as the wolves will consume it all (with help from coyotes and other scavengers).

Wolves are being shot in Western states because they are attacking cattle and other farm animals. Those states should welcome our efforts to capture and relocate their wolves and might be willing to pay some of the expenses involved. An alternative is to ship NJ deer to those states to give wolves more prey and reduce their need to kill cattle, which could be a fallback plan for NJ.

Ancillary problems from attacks on humans and pets and farm animals should be minimal because deer will be the easiest prey. According to wolf.org, "The risks associated with a wolf attacking a human are 'above zero, but far too low to calculate,' between 2002 and 2020, researchers found [only] 26 fatal attacks throughout the world. Of those, 14 were due to rabies [and, therefore, don't count].* Overall there were 489 victims of wolf attacks across the world from 2002 until 2020. Of those, 380 (78%) were rabid attacks, 67 were considered predatory attacks and 42 were provoked/defensive attacks.

Once the deer population has been reduced to the point where it is difficult for all the wolves to find food, the wolves should migrate to NY and PA, which also have substantial deer populations, and those states should welcome this influx. In addition, once the deer population is under control, hunters will need new prey so they can switch to shooting wolves which should be more challenging and enjoyable to hunt. Hunters could also hire out as protectors for people who want to enjoy our forests without the risk of wolf attacks., thus providing a boost to the economies of those areas.

Importing wolves to kill deer – a win-win solution for all (except the deer).

* <https://wolf.org/wolf-info/factsvsfiction/are-wolves-dangerous-to-humans/>

Kristi MacDonald

Watershed protections on public forestlands: Implement strong protections of streams, springs, wetlands, vernal pools and steep slopes

Forested land at the watershed scale is associated with higher water quality in streams and aquifers and is the main source of clean drinking water for the majority of the U.S. population (Frimpong et al. 2005; Neary et al. 2009). Forested riparian ecosystems and wetlands provide critical functions of maintaining water quality by filtering nutrients and other contaminants, shading and cooling water temperatures, providing habitat for aquatic and terrestrial organisms, maintaining channel morphology by stabilizing banks, and slowing and storing floodwater (review in NRC 2002). It would cost billions of dollars a year in infrastructure to replace these ecosystem services.

Requirements must be put in place to protect critical watershed features such as streams, springs, wetlands, vernal pools, aquifers and steep slopes on public forestlands subject to logging, agriculture, and other human disturbances. These requirements include: 1. Mapping of all critical watershed features including permanent and ephemeral habitats such as small headwater streams and vernal pools; 2. Establishing science-based, meaningful minimum buffer sizes to protect watershed features within public forestlands. To provide maximum protection of all ecosystem services and functions we recommend a standard for all public forests of 300-foot buffers for streams and wetlands and a 1000-foot buffer for vernal pool habitat protection; 3. Protecting soils on steep slopes to prevent soil loss, degradation of water quality and silting of streams and wetland areas. There should be no alteration of slopes with a gradient of 10% or greater.

There are several reviews of the literature on the effective riparian buffer width necessary to protect stream health from land use impacts; climate change is necessitating a higher level of concerted planning to mitigate these impacts (Wenger 1999, Army Corps of Engineers 1991, Fischer and Fischenich 2000, Broadmeadow and Nisbet 2004, Sweeney and Newbold 2014). Stream and wetland buffer recommendations depend on targeted parameter, but in general they range from 50ft to 300ft (15-91m); in some cases buffering beyond the entire floodplain is recommended (Wenger 1999), which for the 500-year storm could range up to 250 ft. (76 m) or more. Narrower forest strips act as de facto small forest patches and experience edge effects from adjacent land use (review in Murcia 1995) and for instance, do not reach 100% of natural shade until approximately 250 feet (76 m) from the edge of clearcuts (Brososke et al. 1997). Vernal pool buffers of 1,000 feet protect and promote biodiversity and address the habitat requirements of vernal pool-breeding wildlife.

Leslie Sauer

ECOLOGICAL HEALTH PROPOSAL- The monitoring for public forest management decisions should include Floristic Quality Assessment to assess both baseline and changing conditions over time so that management can be assessed and modified.

The ecological health of our public forests need to be monitored, including all species of plants and animals. Forestry FIA data is not suited to monitoring ecological health and is not sufficient for management decisions in public forests. On a recently logged site in NJ described as 60-80 years old by FIA, dozens of trees in excess of 100 years of age were harvested to create young forest (1,2).

The state is in a position to support best management by endorsing a universal monitoring approach that clearly documents well-executed projects and which is widely regarded as indicative of ecological health (3). Floristic Quality Assessment (FQA) tool assessing the quality of wild plant communities surveyed in the field and for generating metrics that attest to that quality (4,5). It is universally applicable to all vegetated sites, is sanctioned for use in all 50 states by the Environmental Protection Agency, and is well-established among ecological management practitioners in Pa and NJ (6,7,8). The website (universalfqa.org) is an open source database that maintains plant inventory databases for NJ and can be organized by region as well such as Highlands. Total FQA is available as well as well as Cover-Weighted FQA.

Standards for pre- and post-management monitoring involving FQA have been proposed for the New Jersey Highlands by the New Jersey Highlands Council, and similar principles should be adopted for the State for the management of public lands (9,10). FQA is not the only monitoring that should be included in policy. Additional documentation of wildlife and other conditions is important. Many sites have conducted National Geographic BioBlitz surveys for example and Audubon bird count data is extensive. For monitoring to be effective, it must be performed as a baseline, prior to management, and repeated at appropriate intervals after management to assess change. Groups sharing information on on-the-ground, such as The Stewardship Round Table efforts should be encouraged and supported.

Forest management approaches vary necessarily by site and practitioner. Ecology is complex and restoration is a new field (11). The Society for Ecological Restoration has started certifying practitioners (12,13). Many restoration efforts have been led by amateurs and land trusts whose expertise is vital. The State needs to establish a forest management project database that is reviewable by the public and standardizes documentation, including FQA.

Margaret Wood

Fun Statewide Invasive Picking Competition (8-01-2022)

In the US, Invasive Alien Species is probably the #1 threat to biodiversity, with estimates of \$120 billion/year in damage and pest control" (Refs 1,2,3). It will take all NJ communities working every year to combat this problem.

4 proposal items:

Item 1: State of NJ STRONGLY promotes fun public engagement in invasive eradication through all partnerships, as well as public schools, county & local govts, (Ref 4-a). FoHVOS & NYNJTC will be asked to assign work areas. Work is recorded in EDDMapS. FoHVOS NJISST & NYNJTC staff will be asked to

train ""Conservation Corps"" (Ref 4-b) who will in-turn train the public for items 2, 3, & 4. Ask NJ DEC for funding per EPF.

Item 2: Promote invasive eradication competitions via press releases and News12NJ interviews: Earth Day through Arbor Day will have FUN activities facilitating invasive eradication.

- Town fairs,
- School field trips,
- Civic group work parties.

Classes will educate participants on invasive identification, eradication, hiking safety, equipment required, and "Jersey Native" replacement plants pursuant to Jersey Native Plants Program (Refs 5,6,7). Certificates of Training will be earned.

Town fairs may be located in parks safe for beginners, where invasives exist, or shuttle buses can run between the fair and invasive locations.

- Vendors shall offer "Jersey Natives", weeding & garden tools for sale.
- Children may engage in crafts such as making clay wildflower seed balls to plant. (Ref 8)
- Pickers must have training certificates. They receive a Certificate of Appreciation, noting name, phone, address, weight of invasive collected. Tallies recorded in a central database. Prizes awarded in various categories, to best invasive pickers. (Ex: "Grampa's weeder" or ""Jersey Natives""- Ref 9). Pickers encouraged to continue their work (per Item 3).

Item 3: March 1 – May 31: NJ statewide competition: bringing invasives to county disposal facilities. Invasives must be in clear garbage bags, to identify the contents. Certificates of Appreciation given to each picker. Tallies logged into the central database. Prizes awarded to NJ residents for the most invasives picked by weight, (professionals excluded). (Ex: leaf blower equipped with an "eXtreme Blower Spreader" to plant native seed in hard-to-reach areas. - Ref 9.)

Item 4: Professionals adopt a highway, forest trail, or grounds of a public facility, where they will eradicate invasives and plant ""Jersey Natives"". The reward will be a sign advertising them at the road/park/facility, thanking them for their services.

Press releases announcing the winners of the competitions to be sent to the winners' local newspapers, thanking them.

Margaret Wood

Create a State Run, New Jersey Invasive Species Council (NJISC)

Proposal to create a science based, State run, New Jersey Invasive Species Council (NJISC), to work on reporting, treating and eradicating NJ invasives, with initiatives for both public and private lands. The Council should be empowered to influence other governmental entities to achieve State goals. (Ref 1, Background information.)

The need: In the US, Invasive Alien Species is probably the #1 threat to biodiversity, with estimates of \$120 billion/year in damage and pest control" (Ref 2)

NJ is losing the war on invasives, (Ref 3).

All across the US, Invasive Strike Team members report lack of funding, resulting in insufficient manpower.

"The Invasion Curve" (Ref 4) from paper (Ref 5, p.17), prioritizes which invasives to battle.

NJ focuses on eradicating new invasives. Meanwhile, established invasives spread, choking out new areas of the forest and private lands. Habitable land for native species declines. Extinctions rise.

NJ has different organizations (FoHVOS & NYNJTC) with Strike Teams using different reporting tools, under different funding committees.

NJ should see what other states have done to create a Unified Statewide Plan.

Copy Washington State, Tennessee, and NYS initiatives, (Refs 6a, 6b, 7).

NJ needs to:

- Partner several independent groups under one state organization, to achieve goals of a statewide plan,
- Focus on preventing the introduction and movement of invasives first.
- Get all partners to use one unified data reporting system.
- Form a citizen-scientist initiative, lead by agencies & universities on the front lines, training everyone to use uniform reporting tools.
- Utilize the program everywhere in the state on both public & private lands.
- Create a State curriculum to educate students about invasives.
- Teachers get recertification credits for attending annual workshops to teach this curriculum.
- Create a media blitz to form Garden Club of America groups throughout NJ. They successfully form invasive strike team activities called "Weed Wrangles".
- All NJ groups should use EDDMapS invasive reporting tools. It is used in most of the US and Canada. Make it mandatory for any project receiving state funding. The US must unite under one reporting tool, (Ref 8).
- Assign Regional-Land Managers responsible for directing activities in specific regions of NJ, similar to NYS-PRISMs. NJ-PRISM regions could be North, Central, South, and Shore. See (Ref 9).
- Learn from NYNJTC, schools, religious orgs, how to attract volunteers to eradicate invasives. Bring a BOOM-BOX! Afterwards, build a campfire, cook hotdogs, marshmallows, some-mores. Enjoy a traditional American experience. Make it fun. Keep them proud!

Margaret Wood

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250x

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Matt Olson

Revised proposal: Need for an actionable and comprehensive forest management strategy for NJ public lands

There is a growing consensus in forest science that narrowly focused management frameworks (e.g., production forestry, preservation) are not up to the challenge of sustaining healthy forests under changing climate and disturbance regimes (Park et al. 2014, D'Amato and Palik 2021). Successful management systems will need to remain flexible to adapt to future uncertainties in real-time.

One-size-fits-all strategies can have negative ecological consequences. A policy of suppressing and excluding wildfire has left many US forests vulnerable to catastrophic fire. In the Lake States, decades of uneven-aged silviculture have homogenized forests, raising concerns about increased vulnerability to climate change and forest health threats (Knapp et al. 2019). In central Europe, forests under uneven-

aged management were found to support fewer taxa at multiple scales compared to forests under even-aged management approaches, which was tied to greater habitat diversity in the latter (Schall et al. 2018).

Ecological forestry is a naturalistic approach to forest management that integrates our understanding of natural forest dynamics at multiple spatial and temporal scales in the design and implementation of silvicultural systems. Although conservation of biodiversity and ecosystem function are primary goals, ecological forestry has the flexibility to address a much wider range of goals, including ecological restoration, climate change adaptation, and forest health threat mitigation (D'Amato and Palik 2021).

Active and passive forest management may be deployed as an integrated climate change response strategy that also addresses biodiversity conservation. I propose that the New Jersey DEP develops a comprehensive forest management strategy for state lands that integrates both ecological forestry and preservation at the state and forest levels. Furthermore, I propose zoning state lands into two broad land-use categories: preserves and ecological silviculture areas. For example, the state could designate sections of Wharton State Forest adjacent to residential communities as areas for ecological silviculture to reduce fuels through a combination of thinning and prescribed burning with a goal of reducing the risk of lethal wildfire spreading from state forest lands into vulnerable communities. The state could also prioritize designation of old forests on state land as preserves, especially forest types considered high conservation value.

Matthew Olson

Encourage forest industry to address multiple threats to NJ forests

Milling locally grown and harvested timber can be environmentally and economically beneficial. Forest scientists argue that silviculture can increase the resilience and adaptive capacity of forests to health threats, such as destructive insect outbreaks and anthropogenic climate change (Dymond et al. 2014, Park et al. 2014). Life cycle assessment studies on forest carbon consistently show carbon emissions from transportation of timber to the mill increase as haul distance increases (Weyrens et al. 2022). Therefore, milling timber locally can help to reduce the amount of carbon released in the transportation of wood from New Jersey forests to mills out of State.

Our position is that the state should take steps to increase local utilization of New Jersey grown timber. We feel the state should encourage the expansion of the wood products industry in New Jersey, which, in turn, will create a demand for New Jersey timber. This demand would create opportunities to practice ecological silviculture for addressing climate change and forest health threats, while also reducing carbon emissions from the transportation sector.

Michael Van Clef

Comprehensive State Forest Stewardship Plan

The State Forest Action Plan contains a tremendous amount of information and identifies broad objectives. However, it does not provide a spatially and temporally explicit overarching plan for state lands (parks, forests, natural lands, and wildlife management areas) within the overall landscape context that includes all lands (public and private). In addition, it focuses primarily on trees with less focus on non-tree forest elements (e.g., understory shrubs, wildflowers, rare species).

This proposal suggests a more comprehensive overarching plan that identifies broad forest stewardship goals including current and future desired conditions over the next 10 years. This would include enumerating acreage goals to enhance biodiversity through diversification of forest age classes (e.g., old growth, middle-aged, young) across all state lands – goals should be stratified across the physiographic provinces. Age class goals should be strongly guided by historical documentation of past forests that were less impacted by intensive human activities and include broad goals for forest composition (e.g., oak-hickory, birch-maple). Statewide goals should be given context through individual state land goals.

The proposed level of specificity would clarify the states' goals for stakeholders and the general public. This would reduce concerns that have arisen from planning and implementation at individual state lands outside the context of a specific overarching plan.

A comprehensive overarching plan should elucidate and enumerate methods for creating age class diversity (e.g., types of timber extractive or non-extractive methods and fostering forest development on currently non-forest lands or those heavily impacted by Emerald Ash Borer). Methods and specific goals to assure successful tree regeneration and healthy understory shrub and wildflower layers through necessary deer herd reduction should be included as current densities prohibit successful regeneration (See references for deer density associated with healthy forests and rules implemented in Pennsylvania which currently requires deer fencing to assure regeneration following timber removal). It should also clearly define how stewards will prevent invasive plant infestations that are typically associated with tree canopy reduction in the context of overabundant deer (see reference to state invasive species plan).

Mitalee Pasricha

Raising Ecological Literacy: Public Education on Forest Value in New Jersey

Mature, intact forests are vital to the health of ecosystems in NJ and worldwide and are considered the most effective natural means to combat climate change and biodiversity loss (1). Mature forests encourage diversity in insect, arthropod, and plant species by providing stable temperature, humidity, and resources (2). Older growth forests also sequester more carbon than young forests, making them critical in slowing climate change. Intact forests also contain rich biological legacies, complex ecosystem functioning, interior forest species, land use history and native flora which are more resilient to climate change.

In addition to above ground biomass of trees, mycorrhizal fungal networks are invisible, underground systems that sequester large amounts of carbon and are equally important to preserve. Plants direct between 10-50% of their photosynthates to fungi and in exchange fungi can direct up to 80% of soil nutrients for its host plant (3).

Although the public is aware of climate change, most are unaware of the huge role of forests and fungi in mitigating climate change and biodiversity loss. In addition, studies indicate that Americans spend up to 90% of their time indoors (4). The objective of this proposal is to raise ecological literacy by helping citizens take local action against the twin global crises of climate change and species extinction. This will be accomplished through invasive species removal, forest restoration and protection.

Aims:

Create seasonal workshops in town, county and state parks on forest value and restoration. These workshops could include practical activities identifying native flora, fauna, and fungi, understanding the impact of deer on forest health, and the deleterious impact of invasive species on native flora and fauna. Students & retirees can be trained to lead workshops.

Raise public awareness by engaging citizens in forest stewardship. Recruit citizen scientists and new members for invasive species strike teams, leading to healthier ecosystems in NJ.

Institute a statewide mandate for 50 hours of volunteer service for all high school students which will help recruit youth and boost the mental health of teens through outdoor service in forests.

Create a NJ State Forest Day featuring environmental careers, indigenous perspectives, and guided walks. Celebrate forests through collaborative art projects, wild forest edibles, woodland traditions, history, storytimes, and revival of the cultural values of forests.

Nicholas Homyak

New Paradigm No harvesting and extraction of trees from NJ public forests.

Disturbance is Unhealthy. No harvesting and extraction of trees from NJ public forests.

Pre-Ecological Paradigm versus Ecological Paradigm.

The world, man's place in it, and a host of policy issues all look different when viewed in traditional pre-ecological perspectives. These Paradigms must be sorted as one necessary for the climate crisis, the other obsolete, and not ecologically sound.

Politics and Science must become one. Public Forest ""Remaining"" , must not be logged, for any purposes

Logging is Disturbance:

Two scientific aspects of any forest or biosphere integrity to be considered is disturbance, and increased contamination from spread of invasive, and damage to remaining indigenous biome of the forest dynamic. The degree of workforce conscience disciplines and contamination procedures required for logging are highly unlikely, and need not be attempted under any guise.

Biodiversity per se is not the underpinning of ecological stability. Ecosystem integrity and function set the necessary conditions for biodiversity to flourish by achieving stability. Biodiversity then is a function of the relationship between ecosystem structure and dynamics and processes. But it is a stability precariously balanced-constantly ebbing and flowing with each wave of ecosystem change. The Critical Natural Keystone species in maintaining this delicate and ever-shifting balance is Homo sapiens...

The Harvard Forest since their research shows that as forests age they take up more CO2 each year. It used to be thought that forest growth slowed after about 80 years, but their research is showing that forest growth continues to increase for trees up to 150-200 years of age. Letting our forests grow older is one of the biggest mitigating factors we have regarding climate change.

Think of any environmental problem and you will see it is a process where complex systems are being simplified or concentrated materials are being diffused.

Forests can play a large role in climate change through the sequestration or emission of carbon, an important greenhouse gas; through biological growth, which can increase forest stocks; or through deforestation, which can increase carbon emissions.

Every day, a 40 foot tree takes in 50 gallons of dissolved nutrients from the soil, raises this mixture to it's upmost leaves, converts into 10 pounds of carbohydrates and releases about 60 cubic feet of pure oxygen into the air.

Soil Loss: "one percent of organic matter in the top six inches of soil holds approximately 27,000 gallons of water per acre! Removal of this minimal amount of organic matter can have significant water flow implications, especially in a flood prone area.

Patricia Shanley, Ph.D.

National and Indigenous Forest Initiatives with Relevance to NJ

40% of the earth's forest has been lost and what remains is significantly degraded (1). The rate of forest loss is increasing, close to doubling between 2001 and 2020 (2). Worldwide, less than 20% of forests remain intact. In the US, intact forests constitute an estimated 6-7% of forest cover (3). Given the urgency, inter-governmental bodies are calling for system-wide changes whereby indigenous and local people's perspectives are incorporated (4). This proposal recommends that plans for NJ public forests be informed by relevant national and indigenous initiatives.

Global scientific consensus to protect mature forests, align with indigenous worldviews, and are affirmed in the following:

UNFCCC. 2021, World leaders issued a declaration to halt and reverse forest loss and degradation by 2030.

US Executive Order on Forests 2022, "to conserve our mature and old-growth forests on Federal lands and restore the health and vibrancy of our Nation's forests."

US Executive Order - Climate Crisis, 30 x 30. 90 countries agreed to this global mandate to protect 30% of the world's terrestrial and marine habitats by 2030.

Forever Wild: Adirondack Park was saved to protect water and wild areas for recreation and aesthetics.

Expert Consensus: Letter to USFS 8/2022, from 37 eminent scientists recognizing the role of mature forests in curbing climate change, calls for a national prohibition of logging large, mature trees.

Logging Ban 2018: In West VA citizens sent 16,866 letters in opposition to a bill to end an 80-yr ban on logging in state parks. The Forest Steward's Guild stated, Parks are for preserving scenic, aesthetic, scientific, cultural values and natural wonder & provide a balance to areas managed for timber.

NJ Exec. Order #122 2008 by Governor Corzine cites the Nanticoke Lenni Lenape, the Ramapough Mountain Indians, and the Powhatan Lenape Nation and their unique importance in NJ's political, social, and cultural life, calling for "protecting the environment ... and promoting communication between Native Americans and all levels of government".

Lenape representatives and the NJ Comm. on American Indian Affairs need to be involved in decisions about NJ public forests. A process to ensure Native American representation on Advisory Committees is needed. National mandates, such as 30x30, require state-wide implementation; NJ has only 20% public

forests. Given NJs high human population density and development pressure, there is strong citizen support for preserving public forests.

Renee

Logging of Sparta Mountain

National Geographic Magazine "Saving Forests – They Are Key to Protecting the Planet" is a must read for everyone on this Task Force. In its 144 pages not one article refers to "clear cutting" or "creating young forests" as a solution. Trees are not isolated individuals and clear cutting/logging only produces additional stress on our forests. (ATCH A, B, C)

As a solution, Senator Menendez supports the "No Road Rule" in our National Forests. We need to adopt similar legislation in New Jersey. As the most populated state per capita/sq mile thousands of trucks a day releases carbon dioxide statewide. Logging exacerbates the problem. Intact forests sequester CO2. Based on science young forests just do not do the job.

The American Legislative Exchange Council (ALEC) uses terms "young forests" "healthy forests" or "clear cutting". This organization helps provide legislative bills for our congressmen. A major contributor to this group is David Koch, the owner of "Bounty" and other paper products. Koch is a proponent of logging. ALEC endorses those terms making logging more acceptable. This is a marketing ploy to turn a negative (logging) into a positive (clear cutting). As a retired advertising executive, I know the jargon. And it works. Nonsense, don't let it fool you!

The National Audubon Society fought in court to stop logging in Alaska and elsewhere. See Senator Lesniack's article (ATCH D) (ATCH E)

I attended a meeting given by Cailin O'Connor from Kean University regarding the Motus Network. The installation of receivers along with transmitters has the ability to track migratory birds. The information gathered is invaluable. Each installation costs \$100,000 each. There are plans to install a fourth. We are talking \$400,000.

Not all members of FSC (Forest Stewardship Council) support the logging of Sparta Mountain. (ATCH F, G, H).

I propose:

1. Stop the logging of Sparta Mountain and stop logging throughout New Jersey; the negatives far out way the positives. Our legislature needs to pass a "No Roads Rule" for New Jersey.
2. Eliminate ALL money incentives to logging, be it grants, or sale of timber. Let science alone dictate a course of action. Money often distorts one's view.
3. Instead of logging, create tree farms for the purpose of harvesting timber. Wawayanda Tree Farm in Vernon is an example.

Renee Becker

Logging of Sparta Mountain

Senator Menendez supports the "No Road Rule" in our National Forests. We need to adopt similar legislation in New Jersey.

I hate to pick on NJ Audubon (NJA) because they do a lot of good, but not when it comes to Sparta Mountain. NJA along with the NJDEP promotes the use of logging/clear cutting to create a "more balanced ecosystem". They should instead protect our forests to offset CO2.

As the most populated state per capita/sq mile, thousands of trucks release carbon dioxide statewide. Our forests are needed to sequester CO2. Based on science, young forests do not do the job.

The American Legislative Exchange Council (ALEC) uses terms “young forests” “healthy forests” or “clear cutting”. This organization provides sample legislative bills for our congressmen. A major contributor to this group is David Koch, the owner of “Bounty” and other paper products. Koch is a proponent of logging. ALEC endorses those terms making logging more acceptable. This is a marketing ploy to turn a negative (logging) into a positive (clear cutting). As a retired advertising executive, I know the jargon. And it works. But don’t let it fool you!

I attended a meeting given by Cailin O’Connor from Kean University regarding the Motus Network. NJA installed three receivers along with transmitters having the ability to track migratory birds. The information gathered is invaluable. I applaud NJA for this effort. But each installation costs \$100,000 each. There are plans to install a fourth. We are talking \$400,000. Where is the money coming from? We need transparency.

I propose:

1. Stop the logging of Sparta Mountain; the damage done far out way any positives. Our legislature needs to pass a “No Roads Rule” for New Jersey. Read National Geographic, “Saving Forests – They’re key to protecting the planet”. No ambiguity here. (ATCH A)

(ATCH A1)

2. Eliminate ALL money incentives to logging, be it grants, or sale of timber. Let science alone dictate a course of action. Money often distorts one’s view.

3. NJA is NOT affiliated with The National Audubon Society. This confusion works to NJA’s advantage, providing it with perceived leverage. See Senator Lesniack’s article (ATCH B). National Audubon fought in court to stop logging in Alaska (ATCH C). These two organizations are on opposite sides.

NJA’s website implies that Sierra Club and Greenpeace support logging of Sparta Mountain. They do not. These groups are all members of FSC (Forest Stewardship Council) but they don’t support logging. (ATCH D, E, F). We need transparency.

4. Instead of logging, create tree farms for the purpose of harvesting timber. Wawayanda Tree Farm in Vernon is an example.

Silvia Solaun

NJ must look to sustainable alternatives and keep public forests intact and unfragmented

This proposal discusses the need to protect public lands from extractive timber harvests. Public Lands belong to the people and hence their natural resources should not be exploited or mismanaged by groups and individuals who can benefit from their extraction. NJ should instead look to growing alternative, sustainable crops, like hemp & wheat grass, as alternatives to wood consumption on its 750,000+ acres of current agricultural lands. 1 To promote logging in the most densely populated state is deleterious to the state’s 2050 GHG reduction goals and runs counter to all good climate action. In the 200+ Scientists’ letter to Congress, it is stated, “We find no scientific evidence to support increased logging to store more carbon in wood products, such as dimensional lumber or cross-laminated timber (CLT) for tall buildings, as a natural climate solution. The growing consensus of scientific findings is that, to effectively mitigate the worst impacts of climate change, we must not only move beyond fossil fuel consumption but must also substantially increase protection of our native

forests in order to absorb more CO₂ from the atmosphere and store more, not less, carbon in our forests (Depro et al. 2008, Harris et al. 2016, Woodwell 2016, Erb et al. 2018, IPCC 2018, Law et al. 2018, Harmon 2019, Moomaw et al. 2019).

Furthermore, the scientific evidence does not support the burning of wood in place of fossil fuels as a climate solution. Current science finds that burning trees for energy produces even more CO₂ than burning coal, for equal electricity produced (Stermann et al. 2018), and the considerable accumulated carbon debt from the delay in growing a replacement forest is not made up by planting trees or wood substitution (noted below). We need to increase growing forests to more rapidly close the gap between emissions and removal of CO₂ by forests, while we simultaneously lower emissions from our energy, industrial and agricultural sectors.” 2

It is imperative that NJ protect and preserve its public forested lands and allow them to remain intact, unfragmented so they can continue to sequester CO₂, filter our air/water and prevent stormwater runoff. With the over 750,000 acres of current agriculture land in the state, incentives could be created for farmers to grow sustainable crops like hemp. The hemp plant in just four months can provide an alternative to fulfill the demands of the average NJ consumer in a more sustainable and cost-effective manner.

Vinh Lang

Climate Workgroup - Carbon/Climate impacts of Demand and Leakage

Recognizing the need for an effective and progressive response to the uncertainty of global climate change and the disproportionate effects of climate on ecosystems, socio-ecological values, and globalized economics among global regions, (IPCC, 2022). Taking into account, “human activities have become globally interconnected and intensified through new technology, capital markets, and systems of governance, with decisions in one place influencing people elsewhere,” (Folke et al., 2005). Emphasizing the responsibility of New Jersey citizens as diverse global market consumers of forest products, ecosystem services, and carbon emission dynamics participants. Also recognizing the specific needs and special circumstances of people's livelihoods, locally and beyond our jurisdictional boundaries with regard to natural resources. And emphasizing the importance of ensuring global ecosystem integrity and resilience to uncertain changes. Affirming the importance of education, training, public awareness, public participation, public access and cooperation among different levels of governance:

This proposal recommends a bipartisan pledge and review system to increase climate diplomacy and resilience strategies among differing forest stakeholders across New Jersey. Strategies to achieve preferable climate resilience may include but are not limited to:

1. Optimizing local carbon pathways with special regard to leakage and substitution effects, (Franklin, 2018).
2. Fostering ecologically based forest management for ecosystem resilience, recognizing humans impacts over time in disrupting natural processes such as forest fires, etc.
3. Accounting of New Jersey's dependence on forest products and ecosystem services; Forestry and sustainable generation of wood, coupled with meaningful preservation strategies (locally), within our jurisdictional boundaries would allow preservation of primary forests elsewhere in the world, (Berlik et al., 2002).

New Jersey public forest stakeholders recognize that adaptation is a global challenge faced by all within local, national, and international dimensions. “Our decisions are a key component and collectively we

pledge to make a contribution to protect people, livelihoods and ecosystems, taking into account the urgent and immediate needs of those regions that are particularly vulnerable to the adverse effects of climate change,” (Paris Agreement, 2015).

This proposal would require marginal costs for policy formulation, planning, education, and public engagement.

Appendix E-7

Proposals that were not accepted

Proposals that were not accepted by the co-chairs as aligning with the criteria for acceptance. At least three of four co-chairs agree that proposal did not meet the criteria. These proposals were not discussed by workgroup participants. Because numerous participants requested access to all proposals regardless of whether or not they met the criteria for acceptance, they are included here. There were 21 proposals in this category (one was submitted and revised).

Narratives were limited to 2500 characters. Proposal sponsors were invited to also submit references, which are not included here due to space limitations but are available using the sponsor's citation(s) when provided. Footnotes in the proposals indicate a reference to an article, file, memo, or other document. Note that references submitted ranged from unpublished opinions, magazine and news articles, webinars, and journal articles (some peer-reviewed and some not peer reviewed).

- **Bill Wolfe**

DEP moratorium, policy and management hierarchy, and proforestation.

1) a policy of "first, do not harm" by calling upon DEP Commissioner LaTourette to issue an Administrative Moratorium on further development or implementation of DEP forest management policy, including logging projects on public lands pending adoption of reforms;

2) adoption of a policy hierarchy to prioritize competing and conflicting goals, objectives, and management strategies; and 3) adoption of a policy of "proforestation".

- **Chris Hepburn, Ph.D.**

Evaluate Action Proposals Based on Ecological Health Independently From Funding Considerations

To quote from an email from the Task Force chairs, "Senate Environment and Energy Committee Chairman Bob Smith has convened a Forest Stewardship Task Force to seek consensus and prepare a report on actions needed to better protect and manage New Jersey's public forestlands."

Task Force Chairs have asked for proposals describing ways to meet this goal of better protecting and managing NJ's public forests and also proposals regarding funding. Care must be taken here as evaluating proposed actions to further the health of state forests, based on ecological science, is much different than evaluating how to fund activities. Appropriately, the Ecological Health subgroup includes many individuals who are experts in areas such as ecology, forestry, and conservation.

The Task Force needs to generate, evaluate and reach consensus where possible on actions to better protect and manage NJ's public forestlands. Right now we don't know where there will be consensus. It is most sensible to determine what actions the task force is recommending, and the magnitude of funding needed, before working on the means of funding.

If some proposals for actions to better manage forest land come tied to potential revenue generation, for example selling wood products or deer meat, the proposed actions' need to be evaluated according to their effects on a healthy forest ecology and not on their ability to generate funding.

Once the best actions are identified, their costs need to be estimated and funding ideas can be evaluated. Funding may or may not come directly from recommended forest activity (in fact probably not, such as Joe Basralian's proposal for a dedicated water rate increase). And of course, current state budgeting should be examined for existing spending that is lower in priority than forest health and climate change mitigation. Experts on revenue and budgeting should be involved.

The first priority for the Forest Task Force should be on recommending actions to better protect and manage New Jersey's public forestlands.

"

- **Cynthia Soroka-Dunn**

Breathe Wild NJ

Approach owners of lands that have abandoned buildings on them. Request government in NJ to pay to purchase these lands throughout in the state and have the buildings either torn down and plant trees in those areas to reforest them or have those areas put aside for affordable housing. When those areas are put aside for affordable housing there will be a land swap to save another wooded area in NJ that already has open space. This will add forest areas around the state and also take down unsafe areas around the State.

- **Dorothea Stillinger**

NO DISTURBANCE OF VEGETATION, SOIL OR WATER FEATURES ON PUBLIC FORESTS

- Because under most circumstances leaving forests alone is the best way to enhance habitat and increase carbon sequestration the Great Swamp Watershed Association's proposal is that public forests should almost always be left undisturbed; exceptions might be allowed only after public comment and peer-reviewed scientific justification.
- Until updated rules for public forests are adopted no logging, vegetation removal or disturbance on public forests should occur.
- Public forests including Wildlife Management Areas and drinking water preserves are in the public trust and in most cases public funds were used for their acquisition so any disturbance including but not limited to destruction of vegetation such as tree cutting, movement of soil or alteration of watercourses, shouldn't proceed without public input and adherence to restrictions in all documents and deeds for the specific tract, Green Acres restrictions, or wetlands restrictions, for instance.
- Logging and clearcutting upset the ecological balance of the forest so should not occur. Even if any resulting funds support the NJDEP.
- Machinery that causes rutting, compaction or erosion, including but not limited to skidders, earth moving vehicles, heavy trucks, off-road vehicles, motorcycles, causes damage which limits sequestration of carbon and enhancement of habitat so should not be allowed on public forests.
- On public forests vegetation, including but not limited to trees and woody shrubs, that is disturbed, say for invasive management or health reasons, should be left on the site to decay and restore the soil and habitat.

Other considerations found in the references are:

- The age of the trees doesn't much affect the amount of carbon removed from the air, sequestered in the wood of the tree, or retained in the soil when the tree decays. Young and old forests behave pretty much the same in this regard.
- Cooperation of plants is known (plant marigolds with tomatoes to control nematodes) and is beginning to be investigated in depth with regard to mother trees and tree cohorts. An intact forest promotes species and interspecies dependencies.

- There isn't enough scientific evidence to support cutting forests as a management strategy for any particular species, plant or animal. Leaving forests alone, however, is known to benefit species, Indiana bats for instance.

- **Elaine Mann**

Tiny Forests

On September 10, 2019, reintroduced April 12, 2021, S 2452. S2452 is a Climate Changing Bill focused on Voluntary farm and ranch conservation practices, MASSIVE REFORESTATION and wetlands restoration. Climate Stewardship Act of 2019 would support voluntary climate stewardship practices on more than 100 million acres of farmland, plant more than 15 BILLION TREES to revive deforested landscapes and expand Urban Tree Cover, reestablish 08802, phone the Civilian Conservation Corps, restore over 2 million acres of coastal wetlands and create paid employment.

Senator Booker in New Jersey Forest to City introduces two very special people

1. Charles Rosen, Ironbound Farm, 360 Co. Rd., Asbury, N.J., 1-908-904-4115
2. Deacon Willie Davis, 218 Rosa Parks Blvd., Paterson, N.J. 07501, 1-862-264-7059

Please watch a Table For All video this will explain how two men can change the landscape of the inner cities and beyond.

Tiny Forest Planting Method is an invaluable to begin, six easy steps;

1. Forest cover type field survey
2. Soil Survey
3. Soil Preparation
4. Draw Up A Planting Plan
5. Planting Day
6. Management

Appendix

1. Checklist is my forest a tiny forest
2. Species distribution
3. List of edible plants

Tiny forests can be the size of a tennis court.

All new commercial and commercial residential construction should be required to provide a Mini Forest.

- **Elaine Mann**

Urban Mini Forests

Our focus should truly be on preserving the trees and forests that we have first.

I urge you to consider the Mini Urban Forest in our presentation to the Legislature.

Akira Miyawaki's method has been proven around the world.

Estimated 3,300 billion tons of carbon held in terrestrial ecosystems. That is four times more carbon than in the atmosphere in the form of CO₂.

If in the next 30 years, we increase the amount of carbon held in land by 9% we will have brought back to earth all of the CO2 emitted by coal, gas, and oil combustion, deforestation and extractive agriculture since 1800. That would be by increasing the amount of carbon in our lands by 3% per year.

We know how to do that by regenerative agriculture, wetland restoration, managed grazing, mangrove planting and reforestation.

There are 5 billion acres of degraded land on earth. A mini forest will increase the amount of carbon in that land at least 10 times, likely much more.

If 1/5 of our degraded lands become Mini Forests we would achieve the goal of returning all the carbon emitted into the atmosphere from 1800 till now.

Several examples are in the book.

MiniForest Revolution by Hannah Lewis printed 5/2022

- **Jamie Zaccaria**

Proposal to Reverse Enclosed Foothold Trap Use to Increase Ecological Health and Public Safety of New Jersey Forests

I propose the reversal of the New Jersey Fish and Game Council Regulation that allows the use of "enclosed foothold traps" by fur trappers and a return to our original ban on all enclosed body-part traps that capture and hold animals (from here on, referred to as "leghold traps") using jaw-contraptions. Any spring-loaded traps designed to capture a live animal by its limb should be considered illegal—and can be restored as such, under the original law—with a reversal of the 2015 regulation (from here on, referred to as "regulation").

In 1984, the New Jersey legislature banned the sale, use, possession, importation, and transportation of any type of leghold trap. However, in 2015, the New Jersey Fish and Game Council (FGC) voted to adopt a regulation allowing the use of three "enclosed foothold" traps, circumventing the 1984 law. It is the opinion of most environmental groups that this action was a clear undercut of the statute by arbitrarily modifying language.

These traps are indiscriminate, and while fur trappers use them to target species such as raccoons, mink, muskrat, nutria, beaver, and otter, they have shown to be lethal to many other species, including endangered and threatened rats and birds of prey, household pets, and possibly even humans. Animals that have been inadvertently caught in these traps include Bald Eagles, golden retrievers, domestic cats, and mesopredators such as coyotes that are integral to New Jersey's ecosystem.

The traps snap shut on a limb or other body part of an animal with up to 60 pounds of force and inflict excruciating pain, injury, anxiety, and fear—resulting in some animals chewing off their limbs to escape. The alleged "modifications" targeted in the 2015 regulation do not change the use or impact of these traps and thus directly conflict with the 1984 law. Language that aims to release accidentally captured species such as bobcats and fishers is irrelevant, considering the fatal damage done to the animals once captured by these traps.

These traps threaten New Jersey's wildlife, pets, and even the citizen population itself and should be banned from use across the state to protect our forests and the people who use them. Therefore, the NJ State Forest Taskforce should encourage the New Jersey Fish and Game Council (FGC) to immediately repeal the regulation and ban the use of any enclosed body part trap in state lands.

- **Jean Publiee**

massive influences on forests are not deer but human 25 years experience involved in following njdfgw actions against deer and forests

- **Ken Dolsky**

Prioritize Reducing Global Warming to Save Birds

A 2019 report from the National Audubon Society* found that two-thirds of North American bird species will be vulnerable to extinction if global temperatures are allowed to rise at the current rate. The report states:

""By stabilizing carbon emissions and holding warming to 1.5°C above pre-industrial levels, 76 percent of vulnerable species will be better off, and nearly 150 species would no longer be vulnerable to extinction from climate change.""

The only way to reduce global warming is by reducing carbon in the atmosphere by a combination of reducing new emissions and absorbing the carbon in the atmosphere through plant sequestration and ocean absorption. We cannot control ocean absorption of carbon but we can control and optimize plant absorption of carbon by maximizing leaf areas and underground carbon in forests and elsewhere. Leaf area and soil carbon are maximized by allowing all trees to grow to maturity and reach their largest size. Mature forests contain more carbon per acre than young forests. (See proposal #31).

Note: Report is interactive and is not downloadable.

*<https://www.audubon.org/climate/survivalbydegrees>

- **Lew Gorman**

Forest Habitat Creation on Currently Mowed Areas along NJ Highways

This proposes that an organized plan be developed and implemented by the NJ Department of Transportation to drastically reduce mowing especially on limited access highways such as I-295, I-195, and Garden State Highway consistent with safety standards, such as sight lines.

Areas such as clover leafs must be allowed to grow without mowing. These non-mowed will advance to forests after going through natural plant secessional stages that will support pollinators until the habitat reaches young, then forest stages.

This practice of reduced mowing will create forests naturally and will not incur any costs to NJDOT budgets. Rather, it will reduce costs to state budgets and lower emissions.

Fuel consumption will be reduced since less mowing will occur.

This proposal builds on the 2017 NJ Statute created by bills S227/A963 that require native vegetation be planted when highways are restored in NJ. However, the law does not deal with native vegetation management when there is no active restoration. This proposal should be codified into a law that deals with forest or meadow creation due simply by a reduction in mowing along NJ highways in areas that do not have to be mowed for highway safety reasons.

Biodiversity will naturally increase, emissions will decrease, state budget dollars will be saved.

- **Margaret Wood**

NJ Plant Identification App/Website

Invasives are a primary cause of species extinction in the US (Refs 1, 2). They spread from trade to private lands. Seeds, eggs, and microbes are then carried between private and public lands on humans,

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animals, birds, wind, flying insects, waterways, vehicles, boats, firewood, etc. To prevent extinctions, invasives must be eradicated on private lands before they reach the forest.

The public will want to eliminate invasives once they become aware, (Ref 3). The best time to pick invasive plants is early Spring, when natives are dormant. Most will be flowerless. For lay-people, flowerless plants can look alike. To manage their land correctly, residents will want to identify all of their plants: invasives, natives, and cultivated.

NJ needs a plant identification app similar to New England's "Go Botany", (Ref. 4), with 3500 plants in the database. People can't flip through 3500 photos looking for a match to the plant in their yard. The ""Go Botany" app does an amazing job of narrowing down the species, using a dichotomous key. It prompts the user for physical traits to discern families, genera, and species. If there is no flower or seed, the app will ask what they can see: stem, nodes, leaves. Based on that, it will narrow down the possibilities. Once narrowed to a few plants, then 'full profiles' further help users figure out which plant they have.

When residents confidently identify the plants on their properties, they can let natives live and spread, eradicate invasives, and replant "Jersey Natives" in their place. The app would support NJ Stat. 4:10-25.10 (Ref 5).

Partially funded by USDA NRCS, a copy of "Go Botany" might be donated to NJS or purchased.

- Plants that only exist in Hardiness Zones 1-5 would be removed.
- Because of climate change, plants that are between New Jersey and North Carolina, will soon be here. We should add plants from all Mid-Atlantic States, to be Climate-Change proactive, (Ref 6).

Partners from other Mid-Atlantic states and the USDA NRCS could help fund the revised app.

App profiles of invasives should have eradication instructions, and links to report them to the NJ Invasive Strike Force.

Links to other useful websites could be included:

- NJ Invasive identification app, (Ref 7).
- Forest animal identification
- Endangered animal Identification, (Ref 8). Sightings should be reported to protect their habitat or move them to safe habitats.
- Fungi identification, (Ref 9): Learn before you eat!
Identify mycorrhizal fungi for restoration plants in damaged soils.
Private land with curious children or pets may ID & remove poisonous fungi. Have links to poison control centers or advise to call 911.

- **Margaret Wood**

Put a Moratorium on all Fossil Fuel Infrastructure

Reasons:

- 1-Climate Change caused by fossil fuels is a major cause of species decline and extinction (Refs: 1; 2 p.5; 3). Since all life is interdependent, it will eventually lead to our own extinction.

2- The population is declining. The birth rate for young women is 16% below what is needed to maintain the population. Net immigration is also declining, as many immigrants choose to leave the US (Ref 4). NJ & NY had their population decrease since the 2020 census (Ref 5, Tbl 4). We do not need more fossil fuel infrastructure beyond what we have now.

3- NJ increases its green energy every year, satisfying our future energy needs (Ref 6 p.3).

4- If we increase our fossil fuel infrastructure, we will not meet Gov. Murphy's climate agenda (Ref 7).

5- Most of the fossil-fuel expansions will export the fuel to other states and countries (Ref 9 p.1-2). New Jersey gets the toxins and dangers, but none of the energy.

6- Green energy projects provide more jobs than fossil-fuel projects. If we build more fossil-fuel projects we will reduce long term green jobs that support our communities (Refs 8; 7 p.2)

7- PHMSA approved the transport of LNG by rail, to Gibbstown, NJ, for a future LNG export terminal. The exports are for foreign countries. Rail tankers of LNG act as moving bombs. An accident igniting 22 rail tankers will set off a blast equal to Hiroshima. Trains can have 100+ tankers. (Refs: 9 p.2; 10 highlights p2-31; 11 p15).
If it doesn't explode, a spill will freeze and suffocate everything nearby (Ref 10 p.4).

8- Bakken crude oil is being transported by rail through the Highlands in Hunterdon. It is very volatile. (Ref 12, p.6; Ref 13).

9- The fracked gas TGP pipeline, through the Highlands forest and watersheds, is adding a compressor sta. in the forest, by the Monksville Reservoir that supplies water to NNJ & Newark. TGP is expanding a compressor in Wantage. The increased pressure can create hazardous leaks. The blow-downs have toxic VOCs. The extra gas is for unneeded expansion in Westchester NY, not NJ.

10- The Transco fracked gas pipeline will expand compressor sta 505 in Branchburg that receives Marcellus gas through Centerville meter sta #23, sending it south. Then it splits:
--S.West to new compressor sta 201 in New Deptford, then to Repaupo meter sta. by the future Gibbstown LNG export station.
--or East to sta 207 in Oldbridge, to Morgan meter sta #24 on the Raritan Bay.
Is Transco positioning itself for future exports? (Ref 14)

NJ's proximity to the coast, and reputation as a toxic super-fund state, make it a target for toxic fossil-fuel exports. Fossil-fuel companies exploit us, planning to get away with it again.

- **Margaret Wood**

Regulate Bakken Volatility Below 9.0 for Transport

The oil being transported by rail today is not your grandfathers oil. It is Bakken crude. This oil has been extracted from shale by fracking (Ref 1). It is extremely combustible, due to its high concentration of volatile fuels like propane, butane, and ethane released by the fracking process. When shaken during transport, the gases distill out of the oil, like shaking a can of soda, increasing the vapor pressure. The highly flammable and explosive nature of the cargo makes them rolling "bombs", hence their nickname: "Oil-bomb-trains". The trains can be 120 cars, a mile long. Each tanker can hold 30,000 gallons (Ref 4).

Because of loopholes there is no limit on cargo flammability. The science clearly shows that fracked oil is far more ignitable than ordinary crude (Ref 2, pages 7-8 & Ref 3). The government deliberately chose not to look at the ignitability in its regulatory process, in an act of corruption that favors the fossil fuel industry over the safety of the people, (Ref 2, pages 7-8).

"...in early 2014, after three train derailments involving Bakken crude oil all resulted in large fires with explosions, the Wall Street Journal published an article (<https://www.wsj.com/articles/SB10001424052702303640604579294794222692778>)

...Lynn Helms, director of North Dakota's Department of Mineral Resources, made it clear that to remove the volatile elements of the Bakken crude oil mixture would "devalue the crude oil immensely." (https://bismarcktribune.com/opinion/editorial/washington-state-n-d-need-to-agree-on-oil/article_d9264dd4-1853-50d6-9cc7-4f76b2756439.html)

...The reality is that in this case, protecting the public would cut into oil industry profits which is why efforts to make the crude less explosive have not been made."

...The science is clear on this. State regulators and attorneys general (<https://www.desmog.com/2019/10/29/new-york-washington-phmsa-oil-vapor-pressure-rail-rule>) have all made efforts to address the issue. And yet, the oil industry has successfully fought these efforts and that is why the public continues to be at risk."
- (Ref 2) <https://www.desmog.com/2021/02/02/bakken-oil-trains-unsafe-volatile-oil>

It is time for the government to protect the people. There were few problems with oil trains that had vapor pressures of less than 9.0 psi RVP. If volatile gases are removed from the oil at the fracking site, its vapor pressures can be reduced to 9.0 psi RVP. Government regulations should require this before the oil is allowed to be transported.

NJ does not need any expansion of its fossil fuel industry. The amount of Bakken that is transported through NJ should not increase.

- **Nicholas Homyak**

A simple solution to urgent Problem

Public Lands are Public Trust and in the case of Climate Change Scientifically Sacred.

Are these Federal and Earth Justice Comments now open for further comments? Why isn't NJFTF part of this effort or in conjunction with? The loggers are not listening nor grounding themselves in the issue of Climate and Loss of Biodiversity, in fact they are using ecological health, aka loss of biodiversity, as a ploy to mine maturing trees, under the guise of habitat creation, ignoring there is no waste in a forest, and forest self-govern under the phenomena of self-organization.

It seems although Doctor William Moonaw was one of the NJFTF first speakers, his Proforestation - A Simple Solution to an Urgent Problem, is being brushed aside. He is in possession of the Cole Map; above ground carbon density in NE forest. This map from the US Forest Service date of 2010, was actually taken off the UDFS website by the Trump Presidency. This map shows evidence that under the International Panel on Climate, this zone which includes Northern New Jersey can qualify for a State Constitutional Protection Zone for Global Carbon Cycle. Mark Harmon & William K Ferrel study and conclusions ""effects of carbon storage conversion of old growth forest to young. 9/2/1990 Volume 247 pages 699-702 should be known by this Task Force. The fact this Task Force is being dragged into talking

trees by the loggers and not forest ecology in any wholesome scientific sense in troubling; for example soils in a forest contain 1/4 of all species of life on Earth.

Every day, a 40 foot tree takes in 50 gallons of dissolved nutrients from the soil, raises this mixture to it's upmost leaves, converts into 10 pounds of carbohydrates and releases about 60 cubic feet of pure oxygen into the air. Trees absorb noise as in traffic noise. Soil Loss: "one percent of organic matter in the top six inches of soil holds approximately 27,000 gallons of water per acre! Removal of this minimal amount of organic matter can have significant water flow implications, especially in a flood prone area. We need to consider Complex Systems Science; logging is disturbance entropy. Think of any environmental problem and you will see it is a process where complex systems are being simplified or concentrated materials are being diffused.

- **Nicholas Homyak**

Funding Possibilities

State Lottery as a funding Source: GROW NJ GRANTS

In the past NJ has alleged and or used as an excuse to begin the State Lottery that monies would be allotted to education to relieve local BOE taxes.

The New Jersey Lottery Commission held its July Commission meeting last week and announced its unaudited results for the fiscal year that ended on June 30, 2021, posting a record \$3.68 billion in sales, the highest in Lottery history and 14.6% higher than Fiscal Year 2020.

Where do the proceeds of the New Jersey lottery fund go? New Jersey Lottery funds numerous state programs and more than half of the money goes back to lottery players in cash and prizes. New Jersey can imitate California is spreading these monies to support Climate defense and Natural Resource Preservations and enhancements. The NJ-Lotteries now seem completely-non-transparent as to exactly where the monies go.

The former Christie Administration allowed, gave grants to private corporations through State programs called GROW NEW JERSEY, for example: The state had awarded UPS a Grow New Jersey grant for \$40 million over a ten year period. Grow New Jersey is an incentive program that aims to create and retain jobs while also strengthening the state's competitive edge against tax incentive programs in nearby states. The state's subsidy programs have been criticized by some as corporate welfare. NOT ONLY DID UPS here for example receive the grant, but gained a PILOT Deal, rather than a true rateable for the Town, Parsippany in this case. (Former Christie Administration also raided green acre and open space funds for tax patches and most likely these Grown NJ private give-aways.

Why can't similar grants be had for Climate defense; State Park Needs, and Proforestation projects, like invasives, and or Deer Control?

- **Nicholas Homyak**

Language Associated Management for Climate Biodiversity

Rebuttal to Ken Dolsky on proper Language and Specific understands

In Regards to Your proper scope of understanding in specifics of a language; again Professor Emeritus Tom Wessels Glossary of terms, and another word or concept; ""recreation""; another word or concept meaning too many different things to too many people. It should be some healthy outcome for the recreationist and the resource; minimum impacts and disturbance inflicted on remaining wild places.

Thresholds Rules and Regulations

Our Outdoors and or Remaining Forest Areas require Thresholds to prevent ATV's, Single-use Plastics; Smokers, Alcohol, and fires. Litter control and abatements, are a must; would not it be better to enhance the outdoor experience that can be gotten on NJ's remaining frontiers, a goal of Zero-Light-

Pollution rather than camp fires? A new Paradigm pressed on the Parks Management Goals; people bending toward the resource, not the resource to some form of free for all of consumption and left behinds. Expect Something or you'll get No-thing.

As a Volunteer in parks over 47+ years i may attest to the impacts and abuse; present, obvious and sinful. Hauled tons of trash out of Nice Places over the years; sadly our Parks and the American Landscapes have become de facto trash-dumps. Only more diligent Law Enforcements can remedy the abuse. Logging for sure would only increase the abuse from ATVs and their associated impacts and trash more prominent (Graffiti is another all too common crime in our remaining natural areas).

On the impacts of consumption type recreational pastimes *Sustainable scale Ecological economics contend that for any given ecosystems setting, there is an optimum scale of the economy beyond which physical growth in the economy (throughput)(waste) starts costing more than it is worth in terms of human welfare, and resource degradation. Whatever become of Governor Murphy's Plastic Reduction Task Force?

- **Nicholas Homyak**

Public Forest and Forest Remaining Already Been Compromised

Moratorium Now and Amendment to the NJ Highlands Pineland Acts to Exclude logging in Public Forest remaining..If Government as intended is not the means proper in this predicament; of climate change then what is?..Without good government we are doomed. No economic interest, under any circumstances, can ever be above the reverence for life. A huge part of the problem is the Jeffersonian notion that"" the government that governs best is the one that governs least"". While it is true as regards individual liberties, it is absolutely dangerous to think that way as regards economy.. Necessity of a Moratorium: Reasoning ""there already is, was a compromise Private verse Public. Now NJFA wants to compromise all public forest, while they have already without a management plan inflicted disturbance in several public forest.

Moratorium Now! Reasoning a compromise already exists.

The crux of the matter being if Private lands, and lands being lost, and trees being removed on other properties, not to mention diseases now active in the various ""remaining wooded or forested areas""; how can this not be a limit to any further logging, and demonstrate an inappropriate theft of a public owned trust? the Public Forest Remaining, have already been compromised!

Put in another way, this scope of private logging for tax-breaks, and unknown destinations for trees and biomass markets, is already a ""compromise"" in itself. NJ Forestry Association desires a further compromise of the Public Forest Remaining; how can this be allowed under State auspices? It is simply too much of a give away and at the wrong time.

Amend Highlands/ Pineland Acts: 2004-2022 Too much change in too little time..

This also stands as a reason for NJ Highlands Act to amend itself to include No logging within it's Prime Core Protection Zones. Proforestation as a management creed within these remaining ecology spheres Private logging brings tax breaks not income to NJDEP.

- **Nicholas Homyak**

Title Change: Legislation with Language NJDEP/Forest Service

1.NJDEP/Forest Service 2. Tom Wessels Professor Emeritus Antioch U. Myth of Progress

- **Nicholas Homyak**

Pro-Forestation articles

Please except this sources of study in proforestation as proposals in sources to oppose any attempts at logging our Remaining Public Forest Domains: Jones Sauer's work Once and Future Forest should be the Bible Here and incentive for a new Ecological Paradigm

Science References:

Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good

<https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

There are many citations in this article that may also be of use.

Another is:

Dominick A Dellasala, Cyril F Kormos, Heather Keith, Brendan Mackey, Virginia Young, Brendan Rogers, Russell A Mittermeier, Primary Forests Are Undervalued in the Climate Emergency, BioScience, Volume 70, Issue 6, June 2020, Page 445, <https://doi.org/10.1093/biosci/biaa030>

You may need to get this through your library's interlibrary loan system as it isn't Open Access.

*As for your other topic, try searching online Mycorrhizae and ""old growth forest"". May USFS and OA articles come up on this topic which may suit your needs.

Additional Science References:

The Once and Future Forest: Leslie Jones Sauer. A principal and landscape architect and adjunct professor U of Pennsylvania.. "a guide to forest restoration strategies"(New Jersey included in the Index/chapters). Leslie Jones Sauer.. "Once and Future Forest.

Use, Misuse and Management. Atmospheric Change/ Changing types of Impacts: See all of: Part 1 The Forest Today Part 2 The Restoration Process Part 3 Monitoring and Management.

The Myth of Progress. Toward a Sustainable Future Professor Emeritus Tom Wessels: Tom Wessels (born 1951) is an American terrestrial ecologist working as a professor at Antioch University New England in the Department of Environmental

Author of several books

*No Forest Task Force can operate outside the Paradigm and understanding of Wessels Glossary of Scientific Terms : Myth of Progress pages 143-146.

NOVA Science Documentary aired 2/2/2022

Arctic Sinkholes:Colossal explosions shake a remote corner of the Siberian tundra, leaving behind massive craters. In Alaska, a huge lake erupts with bubbles of inflammable gas. Scientists are discovering that these mystifying phenomena add up to a ticking time bomb, as long-frozen permafrost melts and releases vast amounts of methane, a potent greenhouse gas.Science Focus:

Harvard University May 6 2019

Exploring The Underground Network of Trees – The Nervous System of the ForestValentina Lagomarsino is a first-year PhD student in the Biological Biomedical Sciences program at Harvard University.

Hannah Zucker is a second-year PhD candidate in the Program in Neuroscience at Harvard University.

- Nick Homyak

Task Force Inappropriate

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Source: Rutgers Eagleton Institute Center on American Governor: Governor Thomas H. Kean Archive.. May 27, 1986 ""Governor Kean creates the Governor's Council on New Jersey Outdoors in executive order number 138. The council is charged with planning for the current and future needs of outdoor space to meet the requirements of the current and future population of the state."" (of which i attended: Pyramid Mountain came out of it's bowels, not maturing trees on Public Lands)

Her is an example of what a real Governor who loved his State of New Jersey be doing:

We appear to have gone in another business, rather than ecological direction, a perversion of the trust for Public Forest; Sparta Mountain continues, despite it's non-transparent intrusion into the core of the NJ Highlands and Public Forest; despite the fact No Forest Plan actually exists. Sparta Mountain is beyond any compromise, and stands as a offensive to the People of this State, and why the present Governor can not put an end to this violation of the public trust.

The NJ Forestry Association a group of landscaper businessmen, is attempting to replace the NJ Forest Service under NJDEP. Their statement on June 30 Webinar, ""we should not put all our eggs in the same basket"" is revealing in speaking of ""public land"" management. Their realm is private alone, whereas NJ Forest Service is Public and private in encouraging private land owners to be conscience and considerate of ecological and healthily forest ecospheres on property they own or wish to manage. Are we not all in fact ""in the same basket"" especially with the climate crisis facing us on a planetary level?

Finally a common geopolitical dynamic that can unite US, Climate change ,Life or Death, Science or Political garbage. shall we chose the political inappropriate paradigm of business over science, garbage? Is not the climate change that faces us, the ""one basket"" we all need to enforce, and not divide into ""interest""?

The will of God prevails. In great contests each party claims to act in accordance with the will of God. Both may be, and one must be, wrong. God cannot be for and against the same thing at the same time. Science in the background of climate change, and all things according to their background. Shall the will of the Public Trust in government prevail, or be subverted by a Task Force that should never have been formed, a more appropriate scenario would of been Governor Murphy's Council on New Jersey Outdoors.

- **Sandra Chen**

Stewardship Plan Provisions

EcolHlth.Chen.Stewardship/Management1

New Jersey at N.J.A.C. 13:1L-31 et seq. offers private landowners the opportunity to manage their forest lands under Forest Stewardship Plans. The requirements for such plans are set forth in Subchapter 5 of NJDEP's Forestry Rules (https://www.nj.gov/dep/rules/rules/njac7_3.pdf).

If the Task Force recommends Forest Stewardship Plans for public forest lands, the recommendation should address the following:

- The standards set for public forest plans should not be less than those set in NJDEP's rules for private land plans.
- Plan applicability parameters should be clarified, including:

- o Whether a minimum acreage is necessary. For private land plans, the minimum is five acres, but this limit would exclude many forested parks. Small mini forests could make a substantial contribution to addressing climate change, groundwater replenishment, and ecosystem vitality.
- o What types of lands can qualify? Only wildlands? Or could an arboretum or manicured public garden qualify to have a plan?
- o What qualified as "forest land"? Currently the NJDEP's Forest Stewardship Program rules and Highlands Water Protection and Planning Act rules (https://www.nj.gov/dep/rules/rules/njac7_38.pdf), as well as the Pinelands Commission's Pinelands Comprehensive Management Plan rules (<https://www.nj.gov/pinelands/cmp/CMP.pdf>) all use different approaches to determining "forest." The NJBPU's Straw Proposal for rules implementing the Solar Siting Act of 2021, has yet another approach.
- o What ownership coverage would be allowed. Could adjacent preserved areas, but with fully or partially different ownership be under a single plan?
- o Must lands be contiguous? Could one or more non-contiguous parks be under one plan?
- Financial support should be available to municipalities. Private landowners can use a Forest Stewardship Plan to qualify their forests for reduced property taxes under Farmland Assessment (<https://www.state.nj.us/treasury/taxation/lpt/lpt-farmland.shtml>). The owners receive reduced taxes year after year which helps them pay for their management. Certainly, if municipalities are to be required to have plans for municipal forests, they will need some equivalent subsidy that accrues to them annually. There is precedent for the State to provide payment to affected municipalities to compensate for a burden placed on the municipality by State law. (For example, see N.J.A.C. 58:20-5 and N.J.A.C. 32:1-144.)

Appendix F: NJFTF Recommendations for Invasive Species Management Legislation



NJ Forest Task Force

Testimony to the NJ Senate Environment and Energy Committee in support of S2186 - Prohibits sale, distribution, or propagation of certain invasive plant species without permit from Department of Agriculture.

December 15, 2022

Consensus Recommendations for Invasives Species Management Legislation

Prepared by Invasive Species subgroup: Sandra Chen, Emile DeVito, Jeanne Fox, Amy Greene, John Landau, Patricia Shanley, and Michael Van Cleff

The NJ Forest Task Force came to a very strong consensus that robust management of invasive species (including plants, vertebrate and invertebrate animals, and pathogens) is imperative to protect New Jersey's public and private forests as well as agricultural production and urban landscapes.

- Accelerating environmental damages from invasive species in NJ are exacerbating negative global and local climate change impacts.
- Control of invasive species is necessary to maintain the climate defence ecosystem services required for New Jersey's future.

We understand that two bills have been introduced by the legislature (Invasive Plant Regulation bill S2186/A3677 and Invasive Species Task Force bill A2629), but we ask that the recommendations below be considered to strengthen them, ideally beginning with amendments to Invasive Plant Regulation bill S2186/A3677. This bill to regulate the sale, distribution, and propagation of invasive plants can be a foundational building block for invasive species management by halting the continuing purposeful spread of harmful species and establishing best practice invasive species management governance.

New Jersey is one of only four states in the continental US and two states in the Northeast that have no commercial plant regulations (the other Northeast state is Rhode Island). But there is an opportunity and need for regional leadership— the average overlap of regulated species lists across neighboring states is only 17% with the highest amount of neighbor overlap being just above 50%.¹ This neighbor-to-neighbor inconsistency seriously impairs

the effectiveness of state regulations because invasive species spread widely and freely without any regard for state borders.

The New Jersey Forest Task Force recommendations for Invasives Species Legislation to bring NJ towards leadership are:

1. Adopt the definition established by the National Invasive Species Council -
"An invasive species is:
1) non-native (alien) to the ecosystem under consideration, and
2) whose introduction causes or is likely to cause economic or environmental harm or harm to human health."
2. The foundational invasive species management bill, ideally an amended S2186, should legislatively re-establish a permanent and updated New Jersey Invasive Species Council (NJISC) to develop and manage a binding policy and process to regulate and manage invasive plants, vertebrate and invertebrate animals, and pathogens, operating with full public transparency and engagement.

An NJISC should be 'in but not of' the Department of Agriculture and DEP, with additional experts and stakeholders representing other interests including New Jersey Invasive Species Strike Team, New Jersey Nursery and Landscape Association, New Jersey Highlands Council, Pinelands Commission, New Jersey Agricultural Experiment Station, universities, ecologists, botanists, non-profit conservation groups and indigenous peoples.

The Invasives Species Council shall be authorized to:

- o Develop practical strategies and policy to collaboratively research, deploy, monitor, and promote invasive species control methods including but not limited to
 - Regulation of sale, distribution, and propagation
 - Integrated Pest Management methods
 - Biocontrols to mitigate existing widespread invasives
 - Application of deer herd reduction
 - Prescribed burns
 - Reducing unintended human-assisted spreading
 - Community outreach and engagement
- o Define a robust, transparent regulatory protocol consistent with proven best practices, with one model being the regulatory protocol established in New York and recently adopted in Pennsylvania.
- o Maximize the effectiveness and efficiency of invasive species management within the context of scarce resources of NJDEP and NJDA
 - Form partnerships with NJ organizations such as the New Jersey Invasive Species Strike Team (NJSST)
 - Harness volunteers, including youth volunteers to improve their connections to the natural world
 - Build multifaceted collaborations and cooperations with regional states and the Northeast Regional Invasive Species and Climate Control (NERISCC) consortium

- Promote and coordinate data from citizen-scientist mobile app and web-based tools and associated invasive species distribution databases
 - Includes EDDMaPs as managed by NJISST and other states, iMap Invasives as managed by New York State, and iNaturalist.
 - Develop and manage the state strategic plan for invasive species control.
 - The first consideration should be to review the 2009 Invasive Species Strategic plan which is still largely relevant.
 - Re-adoption or adoption-with-updates should be done if it is determined to be the most timely and efficient approach.
 - The council should define a regular schedule to review the plan and update it as warranted
 - Develop strategy and policy to slow the human-assisted spread of existing invasives through best practices adoption including
 - Firewood regulations
 - North America Invasives Species Management (NAISMA) "Play-Clean-Go" and "Weed Free Products" programs (Programs - NAISMA)
 - Focus heavily on community outreach and education through partnerships and collaborations as well as direct outreach from NJDEP and NJDA
 - Focus on channels, media and content investments specific to New Jersey
 - Leverage existing and extensive outreach and training materials such as Penn State University extension, Lower Hudson PRISM and NJISST instead of spending time to recreate these resources.
3. Regarding regulation of the sale, distribution and propagation of invasive species:
- The current proposed S2186 list of species to be regulated is acceptable as a quick start, but it is only a small and static sample of commercial invasive threats. The re-establishment of the NJISC should be authorized to proceed upon enactment of the law so that a more robust entity can immediately begin to evaluate the full suite of harmful invasive species.
 - Listing or de-listing an invasive species shall be an administrative (non-legislative) process to be initiated by the identification of specific species for regulation by NJISC. Identification for regulation shall be determined by NJISC original evaluation or by NJISC review of all species regulated by the states of NY, PA, CT, MD, DE or VA. The criteria to be considered include:
 - (1) the threat the species poses to native species in the State;
 - (2) the threat the species poses to any sensitive habitats or endangered or threatened species in the State;
 - (3) the threat the species poses to any historical, cultural, or infrastructure resources in the State; and
 - (4) the likelihood that the species will escape intended areas of use and propagate uncontrolled in the State.
 (1-4 are per proposed S2186 section 4.b. with "areas of use" replacing "cultivated areas")

- Requiring that any protocol must consider the inclusion of species already vetted and listed (including any sterile cultivars within one of those species that are already vetted and excepted) by neighboring states will:
 - Save significant time and work during the review process, allow New Jersey to benefit from the significant efforts of our neighboring states
 - Efficiently enforce the regional coordination often cited as critical to controlling invasive species
- Because invasives species management becomes exponentially more difficult and improbable as the population of a species grows, the legislation should stipulate that newly emerging invasive species should be priorities for NJISC review and listing even though many of these species are not yet 'obviously' causing severe damage in natural areas.
 - This strategy fits well with the widely established invasive species management practice of "Early Detection / Rapid Response" (EDRR) to prevent harm while it is still practical and possible.
- A deadline of no more than 1 year should be mandated to create the first complete regulated invasive species list. The NJISC shall:
 - Designate for regulation the species listed in the proposed NJ S2186/A3677 as well as review for designation any species that are regulated in NY, PA, CT, MD, DE or VA . Not designating any species regulated in these states requires an active and fully documented decision.
 - Evaluate the 191 plant species and 97 other species listed as Widespread, Emerging, and Watch/Potential as of 2022 by the New Jersey Invasive Species Strike Team as candidates for regulation.
 - Continuing to evaluate and designate species for regulation, whether proposed in New Jersey or regulated in neighboring states, shall be an on-going responsibility of the council.
 - Allow the sale, distribution, and propagation of sterile cultivars of otherwise regulated species that are approved for sale in NY, PA, CT, DE, or VA and determined by the council to be safe for NJ.
 - Establish the policy and requirements for all permitted and regulatory exceptions.
 - Establish labeling and educational material requirements such as
 - Labeling and education material requirements regarding distribution and sale of excepted cultivars
 - Labeling of invasive plants being sold during their phase-out period
- The NJISC shall consider the impacts of species regulation decisions on the New Jersey nursery and landscape industry, including making reasonable efforts to minimize economic burdens.
 - The inventory life cycle for growers may be less than a year for annuals to a decade or more for trees.

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- The current proposed S2186 phase-out period of 24 months is an unfair and unnecessary economic burden for the nursery industry. We recommend building a dichotomy that emphasizes differences between newly emerging vs. already widespread species as well as the dichotomy between widely sold vs. not widely sold species. An example suggested phase-out period is provided below:

Pipeline Flush Category	Annual Plants Timeline	Perennial Herbaceous Plants Timeline	Woody Shrub Species Timeline	Tree Species Timeline
Species not widely planted or newly emerging species in natural areas	1 yr	2 yrs	3yrs	5 yrs
Widely planted species or already widespread species in natural areas	2 yrs	3 yrs	5 yrs	10 yrs

- Penalties imposed by NJDA should involve fines sufficient to stop and prevent violation.
 - NJDA may give a warning or small fine for a first offense, but fines must escalate to many thousands of dollars for subsequent offenses.
 - Regulated species are permanently listed, requiring an administrative action to change a specific listing status. New listings may be added on an ongoing basis. To assure currency, the full regulated species list should be reviewed by NJISC at minimum of every three years. This will allow consideration of newly emerging invasive species, including species that are beginning to spread due to a warming climate.
4. To cost-effectively increase the pool of NJ Invasives Species Management Resources, legislation should allow for the creation of one or more formal public/private partnerships similar to the New York State PRISM's (Partnerships in Regional Invasives Species Management, e.g. LowerHudson PRISM).
- Partner Groups should include organizations such as:
- New Jersey Invasive Species Strike Team
 - NY/NJ Trail Conference (this organization hosts Lower Hudson PRISM with headquarters in Mahwah New Jersey)
 - County Park Commissions
 - NJ Land Conservancies

- Rutgers Environmental Stewards, NJ Forestry Association Woodland Stewards and other citizen-steward organizations
- New Jersey Youth Corp and other youth-engagement organizations
- NJ Native Plant Society

Sources:

- (1) Beaury, E.M., E.J. Fusco, J.M. Allen, and B.A. Bradley (2021) "Invasive plant regulations in the United States are reactive and inconsistent". Journal of Applied Ecology

Commented [1]: is this where 17% and 50% is cited?
We should footnote it rather than put it here in text.

Neighboring State Information

New York

New York Regulation:

https://www.dec.ny.gov/docs/lands_forests_pdf/isprohibitedplants2.pdf

Report to Legislators:

https://www.dec.ny.gov/docs/lands_forests_pdf/invasive062910.pdf

NY Invasive Species Council: <https://www.dec.ny.gov/animals/6989.html>

Specifics and background information:

<https://www.dec.ny.gov/animals/99141.html>

Pennsylvania

Pennsylvania Invasive Species Council -

https://www.agriculture.pa.gov/Plants_Land_Water/PlantIndustry/GISC/Pages/default.aspx

PA invasives plan -

https://www.agriculture.pa.gov/Plants_Land_Water/PlantIndustry/GISC/Documents/PISC%205%20Year%20Plan.pdf

PA legislation -

<https://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?act=46&sesInd=0&yr=2017>

They utilized the species evaluation system established by New York and are considering adding species to the regulated list.

<http://cedatareporting.pa.gov/reports/powerbi/Public/AG/PI/PBI/PISC%20Invasive%20Species>

<https://woodyinvasives.org/regulatory-information/pennsylvania/>

Connecticut Regulation

<https://cipwg.uconn.edu/ct-state-invasive-plant-laws/#>

Delaware Regulation

<https://whyy.org/articles/ban-on-invasive-plants-great-win-for-delaware-conservation/>

<https://legis.delaware.gov/son/BillDetail/GenerateHtmlDocument?legislationId=48260&legislationTypeId=1&docType>

Virginia Regulation

<https://vnps.org/action-alert-phasing-out-the-propagation-and-sale-of-invasive-plants/>

Maryland Regulation

[Maryland Invasive Plants Prevention and Control](#)

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Appendix G. Glossary

We provide standard definitions from professional societies or entities involved in forest stewardship and ecological restoration. These are terms that are used in the framework of recommendations and that were used during discussions of proposals and during meetings. While there are many more forest and ecology terms, these are the terms that were often raised during discussions.

Some participants requested we use terms defined by the Society for Ecological Restoration. However, this organization does not public a glossary or provide definitions in their reports.

Adaptive management (1) A process of iteratively planning, implementing and modifying strategies for managing resources in the face of uncertainty and change. Adaptive management involves adjusting approaches in response to observations of their effect on, and changes in, the system brought on by resulting feedback effects and other variables.

Adaptive management (2) Dynamic approach to forest management in which the effects of treatments and decisions are continually monitored and used, along with research results, to

Administrative Procedures Act (3) The Administrative Procedure Act (APA) governs the process by which federal agencies develop and issue regulations. It includes requirements for publishing notices of proposed and final rulemaking in the Federal Register, and provides opportunities for the public to comment on notices of proposed rulemaking.

Afforestation (1) Conversion to forest of land that historically has not contained forests. See also Deforestation.

Afforestation (2) The process of establishing trees on land that has lacked forest cover for a very long period of time or land that has never been forested.

Approved Forest Stewardship Plan – Minimum guidelines for NJ State Forest Stewardship Plans on private land.

<https://www.nj.gov/dep/parksandforests/forest/docs/StewardshipPlanGuidelines1-18-18.pdf>

Carbon Flux (2) Refers to the direction and rate of transfer or flows, of carbon between pools.

Biodiversity **Biodiversity or biological diversity** (1) means the variability among living organisms from all sources including, among other things, terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems (UN, 1992). See also Ecosystem and Ecosystem services.

Biological diversity (4) Biological diversity refers to the variation among living organisms and the ecological complexes of which they are a part. This includes the interrelated nature of genetics, species, and populations across the landscape

Biodiversity hotspots (1) Biodiversity hotspots are geographic areas exceptionally rich in species, ecologically distinct, and often contain geographically rare endemic species. They are thus priorities for nature conservation action.

Carbon Pools (2) Reservoirs of carbon having the capacity to take in and release carbon.

Carbon sequestration (2) The uptake and storage of carbon. Trees and plants, for example, absorb carbon dioxide, release the oxygen and store the carbon. Fossil fuels were at one time biomass and continue to store the carbon until burned. Storage of carbon through natural, deliberate or technological processes in which carbon dioxide is diverted from emissions sources or removed from the atmosphere and stored biologically in the ocean and terrestrial environments (e.g., vegetation, soils and sediment) or in geological formations (USGS.gov).

Carbon sink (2) A carbon reservoir that absorbs and stores carbon from another part of the carbon cycle. A sink stores more carbon than it emits to the atmosphere. This store of carbon can also be termed a reservoir or pool. Although a growing forest can be considered a carbon sink, when the forest stops growing and its trees die and start decomposing, it becomes a carbon source, because it emits more carbon than it stores. A compartment within the Earth system that acquires carbon from the atmosphere and stores it for a specified period of time.

Carbon Storage (2) the quantity of forest carbon deposited in various pools and held for a period of time.

Climate change (1) A change in the state of the climate that can be identified (e.g., by using statistical tests) by changes in the mean and/or the variability of its properties and that persists for an extended period, typically decades or longer. Climate change may be due to natural internal processes or external forcings such as modulations of the solar cycles, volcanic eruptions and persistent anthropogenic changes in the composition of the atmosphere or in land use. Note that the United Nations Framework Convention on Climate Change (UNFCCC), in its Article 1, defines climate change as 'a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods'. The UNFCCC thus makes a distinction between climate change attributable to human activities altering the atmospheric composition and climate variability attributable to natural causes. See also Climate variability, Detection, Attribution and Ocean acidification (OA).

Climate Change (2) Changes in average weather conditions that persist over multiple decades or longer. Climate change encompasses both increases and decreases in temperature, as well as shifts in precipitation, changes in frequency and location of severe weather events and changes to other features of the climate system

Climate justice (1) Justice that links development and human rights to achieve a human-centered approach to addressing climate change, safeguarding the rights of the most vulnerable people and sharing the burdens and benefits of climate change and its impacts equitably and fairly (MRFJC, 2018).

Climax forest (2) The final stage of forest succession, usually composed of shade-tolerant species that are self-perpetuating without a disturbance.

Deforestation Conversion of forest to non-forest. (1) See also Afforestation and Reforestation.

Ecological forestry (2) an approach to forest management placing special emphasis on and consideration of ecological processes and function.

Ecological restoration (5) s the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed.

Ecosystem (1) A functional unit consisting of living organisms, their non-living environment and the interactions within and between them. The components included in a given ecosystem and its spatial boundaries depend on the purpose for which the ecosystem is defined in some cases, they are relatively sharp, while in others they are diffuse. Ecosystem boundaries can change over time. Ecosystems are nested within other ecosystems, and their scale can range from very small to the entire biosphere. In the current era, most ecosystems either contain people as key organisms or are influenced by the effects of human activities in their environment.

Ecosystem function (2) The major process of ecosystems that regulate or influence the structure, composition and pattern. These include nutrient cycles, energy flows, trophic levels (food chains), diversity patterns in time/space development and evolution, cybernetics (control), hydrologic cycles and weathering processes.

Ecosystem health (1) Ecosystem health is a metaphor used to describe the condition of an ecosystem, by analogy with human health. Note that there is no universally accepted benchmark for a healthy ecosystem. Rather, the apparent health status of an ecosystem is judged on the ecosystem's AII 2907 Glossary Annex II resilience to change, with details depending upon which metrics are employed in judging it and which societal aspirations are driving the assessment (following IPBES 2019).

Ecosystem services (1) Ecological processes or functions having monetary or non-monetary value to individuals or society at large. These are frequently classified as (1) supporting services such as productivity or biodiversity maintenance, (2) provisioning services such as food or fibre, (3) regulating services such as climate regulation or carbon sequestration and (4) cultural services such as tourism or spiritual and aesthetic appreciation. See also Ecosystem and Ecosystem health.

Ecosystem services (2) The combined resources and processes of natural ecosystems that provide benefit to humans, including, but not limited to, the production of food and water, the control of climate and disease, cycling of nutrients and crop pollination, spiritual and recreational benefits and the preservation or maintenance of biodiversity.

Ecosystem-based adaptation (EBA) (1) The use of ecosystem management activities to increase the resilience and reduce the vulnerability of people and ecosystems to climate change (Campbell et al., 2009). See also Nature-based solution (NBS).

Even-aged stand (4) Stand of trees in which there are only small differences in age among the individual trees (28)

Forest (1) A vegetation type dominated by trees. Many definitions of the term forest are in use throughout the world, reflecting wide differences in bio-geophysical conditions, social structure and economics. See also Afforestation, Deforestation and Reforestation [Note For a discussion of the term forest in the context of national GHG inventories, see the 2006 IPCC Guidelines for National GHG Inventories and their 2019 Refinement, and information provided by the United Nations Framework Convention on Climate Change (IPCC 2006, 2019; UNFCCC, 2021a, 2021b).]

Forest degradation (1) A reduction in the capacity of a forest to produce ecosystem services such as carbon storage and wood products as a result of anthropogenic and environmental changes.

Forest Density (2) The quantity of trees per unit of area, usually expressed as trees per acre.

Forest land (2) Land that has at least 10 percent crown cover by live tally trees of any size or has had at least 10 percent canopy cover of live tally species in the past, based on the presence of stumps, snags or other evidence. To qualify, the area must be at least 1.0 acre in size and 120.0 feet wide. Forest land includes transition zones, such as areas between forest and nonforest lands that meet the minimal tree stocking/cover and forest areas adjacent to urban and built-up lands. Roadside, streamside and shelterbelt strips of trees must have a width of at least 120 feet and continuous length of at least 363 feet to qualify as forest land. Unimproved roads and trails, streams and clearings in forest areas are classified as forest if they are less than 120 feet wide or less than an acre in size. Tree-covered areas in agricultural production settings, such as fruit orchards or tree-covered areas in urban settings, such as city parks, are not considered forest land.

Forest management Generally, the practical application of scientific, economic, and social principles to the administration and working of a specific forest area for specified objectives

Forest Planning (4) Forest plans set the overall management direction for forests.

Forest type groups (2) A combination of forest types that share closely associated species or site requirements.

Forest type (2) A classification of forest land based upon and named for the tree species that forms the plurality of live-tree stocking. A forest type classification for a field location indicates the predominant live-tree species cover for the field location; hardwoods and softwoods are the first group to be determine predominant group and Forest Type is selected from the predominant group.

Forest (4) Area managed for the production of timber and other forest products or maintained as wood vegetation for such indirect benefits as protection of catchment areas or recreation

Fragmentation (forest) (2) The breakup of a large land forest area into smaller patches isolated by areas converted to a different land type. Opposite of connectivity.

Fragmentation (habitat) (2) The break-up of a large continuous land area by reducing and dividing into smaller patches isolated by areas converted to a different land type. Habitat can be fragmented by natural events or development activities.

Habitat (2) The environment in which a population or individual lives; includes not only the place where a species is found, but also the particular characteristics of the place (for example, climate or the availability of suitable food and shelter) that make it especially well-suited to meet the life cycle needs of that species.

Harvest (4) The removal of trees for wood fiber use and other multiple use purposes (36 CFR 219.16). (FSH 1909.12, 60) Timber harvest transfers carbon off the forest ecosystem and stores it in wood products like lumber.

Indigenous Peoples (1) Indigenous Peoples and Nations are those that, having a historical continuity with pre-invasion and pre-colonial societies that developed on their territories, consider themselves distinct from other sectors of the societies now prevailing on those territories, or parts of them. They form at present principally non-dominant sectors of society and are often determined to preserve, develop and transmit to future generations their ancestral territories, and their ethnic identity, as the basis of their continued existence as Peoples, in accordance with their own cultural patterns, social institutions and common law system. Cobo (1987)

Invasive nonnative species (2) Are those animal and plant species with an extraordinary capacity for multiplication and spread at the expense of other native species. Plants in this category may or may not be designated as noxious weeds.

Invasive plant species (2) Nonnative plant species that invade or are introduced into an environment or ecosystem in which they did not evolve where they have the ability to compete with and at times overshadow, the existing native plant species. Invasive species are also likely to cause economic or environmental harm or harm to human health. Invasives include seeds, eggs, spores or other biological material capable of propagating that species, that is not native to that ecosystem (with respect to a particular ecosystem). Noxious weeds are a specific type of invasive plants that carry a legal designation due to their potential for detrimental impacts to the environment.

Invasive species (1) A species that is not native to a specific location or nearby, lacking natural controls, and that has a tendency to rapidly increase in abundance, displacing native species. Invasive species may also damage the human economy or human health.

Inventory (forest) (2) A survey of a forest area to determine data such as area, condition, timber, volume and species for a specific purpose, such

Keystone species (2) A species whose presence and role within an ecosystem has a disproportionate on other organisms within the system.

Land Use (2) Activities taking place on land, such as growing food, cutting trees or building cities

Monitoring (2) A process of collecting information to evaluate whether or not objectives of a project and its mitigation plan are being realized. Monitoring allows detection of undesirable and desirable changes so that management actions can be modified or designed to achieve desired goals and objectives while avoiding adverse effects to ecosystems.

Old growth forests (4) Old growth encompasses the later stages of stand development that typically differ from younger stages in a variety of characteristics that may include tree size, accumulations of large dead woody material, number of canopy layers, species composition and ecosystem function

Overstory (2) The portion of the trees, in a forest of more than one story, forming the upper or uppermost canopy layer.

Prescribed burn (4) refers to the controlled application of fire by a team of fire experts under specified weather conditions to restore health to ecosystems that depend on fire.

Proforestation (2) is the practice of growing a forest and keeping it intact in order to maximize its ecological potential.

Reforestation (2) the reestablishment of forest cover either naturally or artificially.

Regeneration (2) Seedlings or saplings existing in a stand or the act of renewing tree cover by establishing young trees naturally or artificially.

Riparian area (2) An area with distinctive soils and vegetation between a stream or other body of water and the adjacent upland area consisting of vegetation that requires free or unbound, water for survival.

Silviculture (2) Applying knowledge of silvics to culture the forest. Silviculture is practiced in four stages establishment, intermediate operations and harvesting and stand/forest protection.

Stand density (2) A quantitative measurement of tree stocking, expressed in terms of number of trees, total basal area or volume, per unit of area. More precisely, a measure of the degree of crowding of trees within a stand.

Succession (2) The process of one plant community modifying the environment in such a way that favors the establishment and eventual domination of another plant community. One overtakes another, which is then overtaken by another.

Sustainability (1) Involves ensuring the persistence of natural and human systems, implying the continuous functioning of ecosystems, the conservation of high biodiversity, the recycling of natural resources and, in the human sector, successful application of justice and equity.

Sustainable forest management (1) The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national and global levels, and that does not cause damage to other ecosystems (Forest Europe, 1993).

Sustainable land management (1) The stewardship and use of land resources, including soils, water, animals and plants, to meet changing human needs, while simultaneously ensuring the long-term productive potential of these resources and the maintenance of their environmental functions (adapted from WOCAT, undated).

Thinning (4) Cuttings made in immature stands in order to stimulate the growth of the trees that remain and to increase the total yield of useful material from the stand

Thinning (2) The cutting and/or harvesting living trees to scientifically determined lower targeted densities, where a majority of the forest growth during this planning cycle in treated areas will come from existing living trees retained within the forest, rather than from the establishment of new trees (regeneration).

Timberland (2) Forest land that is producing or is capable of producing crops of industrial wood and not withdrawn from timber utilization by statute or administrative regulation. (Note Areas qualifying as timberland are capable of producing in excess of 20 cubic feet per acre per year of industrial wood in natural stands. Currently inaccessible and inoperable areas are included.)

Understory (2) All forest vegetation growing under an overstory and midstory in a forest.

Wildland-urban interface (2) The line, area or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. Describes an area within or adjacent to private and public property where mitigation actions can occur to prevent damage or loss from wildfire.

Sources for definitions

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https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_Annex-II.pdf

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(3) USEPA, Summary of the Administrative procedure Act, 1946.
[https://www.epa.gov/laws-regulations/summary-administrative-procedure-act#~:text=The%20Administrative%20Procedure%20Act%20\(APA,on%20notices%20of%20proposed%20rulemaking](https://www.epa.gov/laws-regulations/summary-administrative-procedure-act#~:text=The%20Administrative%20Procedure%20Act%20(APA,on%20notices%20of%20proposed%20rulemaking).

(4) US Department of Agriculture/US Forest Service, Glossary and List of Acronyms, March 2010.
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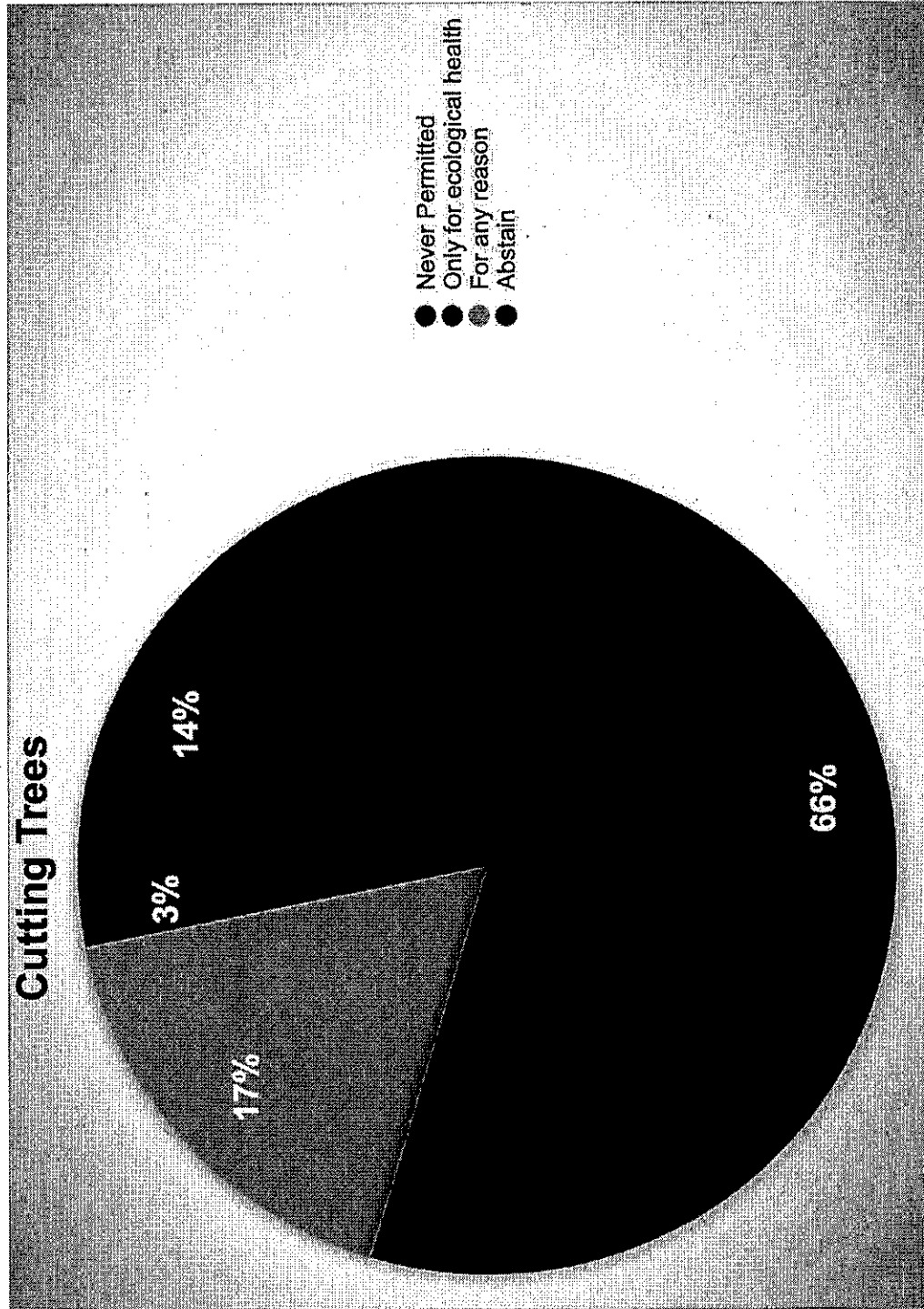
(5) Society of Ecological Restoration, [Restoration Resource Center What is Ecological Restoration? \(ser-rrc.org\)](https://www.ser-rrc.org/what-is-ecological-restoration/), <https://www.ser-rrc.org/what-is-ecological-restoration/>.

NJ Forest Stewardship Task Force Findings and Recommendations

**NJFTF co-chair update to Joint Senate Environment and
Assembly Environment and Solid Waste Committees**

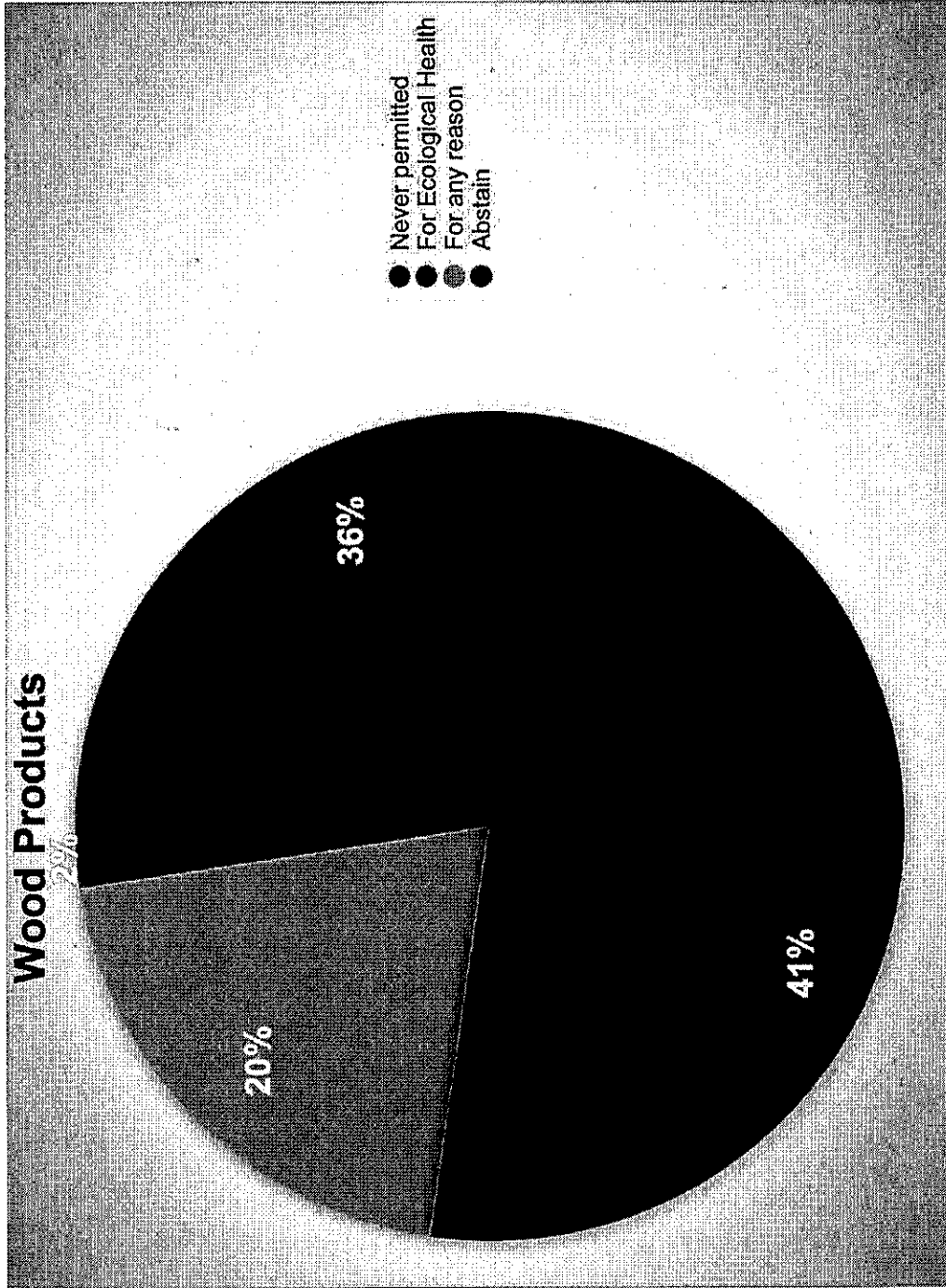
February 22, 2023

Cutting of Trees



295x

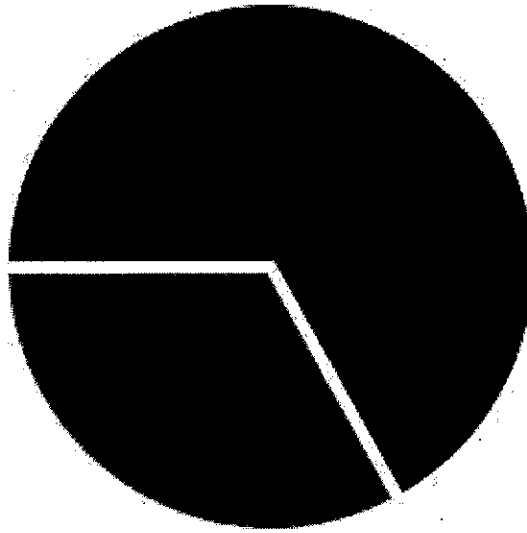
Wood Removal



296x

Final Framework

Organizations



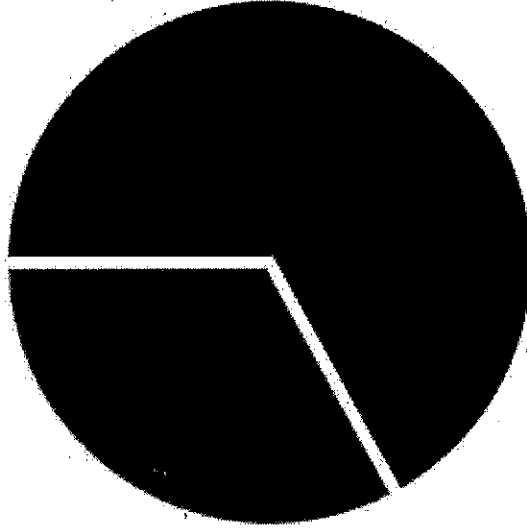
• Organizations supporting • Organizations not supporting

49 organizations:

33 support framework (67%)

16 do not support framework (33%)

Individuals



• Individuals supporting • Individuals not supporting

64 individuals:

43 support framework (67%)

21 do not support framework (33%)

The Framework

Statewide Inventory and Planning

Recommendation 1:

The NJDEP should be directed to initiate and conduct a statewide planning and mapping process for forested public land. Future protection and management of NJ's public forests must be based upon a comprehensive planning and mapping process at the landscape level based upon sound science and data. Additional appropriate inventories of significant biota and resources, as needed and feasible, should be included. This planning process should be directed by a science advisory panel* as well as require public participation throughout the process consistent with other comparable legislative processes in the state of NJ. The process should focus on state owned lands and then extend to significant forested parcels of county, municipal, and other lands acquired using state funding (acreage to be determined in the rulemaking). Throughout the planning process, places with historical, cultural and spiritual significance for Indigenous People should be identified, characterized, and protected.

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

Recommendation 2:

The NJDEP should be directed to commence a formal rulemaking process for the development of forest management plans* on public forests. The rulemaking will be informed by and consistent with statewide planning and inventory efforts in accordance with the NJ Administrative Procedures Act. The rulemaking should not take longer than three years to be adopted.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans, or other plans on public forested lands*

Recommendation 3:

The NJDEP should be directed to initiate and complete rulemaking to provide interim guidelines for forest management plans* on public lands. A rulemaking process, separate from Recommendation 2 and consistent with the NJ Administrative Procedure Act, will be initiated and completed within one year. This rulemaking will outline interim guidelines to govern the development of forest management plans* on state lands as well as significant forested parcels of county or municipal lands acquired with state funding (acreage to be determined in the rulemaking) until the more comprehensive rulemaking described in Recommendation 2 is finished. Once the rulemaking process has begun, newly initiated plans will not be approved for a one-year period or until the rules are adopted, whichever comes first. If this rulemaking extends beyond one year, those plans can move forward. During this one-year period, exceptions will be permitted in instances including emergency scenarios, fire management, or invasive species.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans, or other plans on public forested lands*

Recommendation 4:

The NJDEP should be directed to revitalize and implement the existing Natural Areas Program. The Program needs to be revitalized with increased funding, staffing, and appointments to fill vacant seats in order to fulfill the original vision and mission of the program. Implementation of activities within areas already identified with management plans should start immediately, and areas that are already identified but do not have plans should be prioritized for plan development. Further, the planning process should identify additional Natural Areas to be designated on public lands, including Natural Heritage Priority Sites. Additional resources are needed to fully implement the Natural Areas Program for existing and new Natural Areas.

Recommendation 5:

The NJDEP should be directed to identify areas where afforestation and reforestation should occur on public lands. This should be done as part of the inventory and planning process and should include measures needed to ensure success, consistent with the carbon sequestration goals identified in the NJDEP Global Warming Response Act 80x50 report,* which pursuant to that report includes reforestation.

*State climate goals - NJ's Global Warming Response Act 80x50 Report. pp 153-160.

<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>

303x

Recommendation 6:

The NJDEP should be directed to establish a new program within the agency to designate carbon reserves, as identified through the planning process, with a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel*) for their carbon benefit. Carbon reserves should be defined similar to "ecological reserves" in the Natural Areas Program as areas "managed to allow natural processes to proceed with little or no habitat manipulation" with the exception that management will occur only to address ecological or safety threats, as approved by an oversight council** that includes a mix of NJDEP representatives and private interests representing appropriate expertise. The council should be appointed by the Commissioner of the Department of Environmental Protection and have authority similar to the NJ Natural Lands Trust.

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

*** The oversight council should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists). There should be no Governor or legislative approvals needed for appointments to move forward.*

305x

Recommendation 7:

The NJDEP should be directed to identify areas where active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health. This is consistent with the carbon sequestration goals identified in the NJDEP Global Warming Response Act 80x50 report,* which discusses proactive management for carbon defense including thinning and burning.

**State climate goals - NJ's Global Warming Response Act 80x50 Report, pp 153-160.*

<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>

Recommendation 8:

The NJDEP must recognize the importance of adaptive management during the inventory and planning process, whereby planning, inventory, and management approaches are adjusted over time based upon new data and changing circumstances in our forests. The statewide planning and inventory should be updated at least every 10 years after completion of the first Statewide inventory.

Recommendation 9:

The NJDEP must recognize the significant variation in our forests, both on a macro (landscape) level and micro level as a guiding principle of the planning and rule-making process. For example, the uniqueness of the Pinelands and other regions of the state should be acknowledged as well as the variations that occur at a much finer spatial scale within a forest.

Forest Management Planning and Implementation

Recommendation 10:

NJDEP must protect and manage NJ's public forestlands to maintain and enhance carbon sequestration and storage as necessary to advance state climate goals* while advancing equally important goals of ecological health, biological diversity, climate resiliency, and protection of water and soil resources while providing low-intensity, safe public recreation opportunities. ** Planning and inventories should guide the prioritization of management goals in specific areas, recognizing that these goals will be achieved across the aggregate of acres owned by the state rather than on one single acre in any specific area. Meeting these goals requires multiple management, restoration, and protection approaches which must be guided by sound science and be consistent with and guided by the inventory and planning process.

*State climate goals - NJ's Global Warming Response Act 80x50 Report, pp 153-160.

(<https://www.nj.gov/dep/climatechange/mitigation/index.html#:~:text=Global%20Warming%20Response%20Act%20%E2%80%94%20Legislation,below%202006%20levels%20by%202050>)

**Low intensity recreation as defined means non-motorized outdoor, nature-based recreational activities, including, but not limited to, boating, swimming, fishing, hiking, hunting, trapping, picnicking, nature observation, photography, horseback riding, tent and shelter camping, cross-country skiing, bicycling, snowshoeing, rock climbing, ice climbing, and enjoyment of open space.

308x

Recommendation 11:

NJDEP forest management plans on public land must be developed in accordance with the process established through rulemaking noted in the previous section (Recommendations 2 and 3).

Recommendation 12:

The NJDEP should continue to use fire as an important management tool based upon sound science. The most significant action the agency can take on this issue is to fully implement the Prescribed Burn Act, which outlines processes for the use of prescribed burning as an effective tool for forest management and public safety. NJDEP should assist other land managers to use fire as a management tool in accordance with the Act. This assistance includes appropriate training to land managers to further expand the use of prescribed fire. In addition, the legislature and NJDEP should identify and address any legal barriers that hinder the use of prescribed fire by trained land managers.

Recommendation 13:

The NJDEP should be directed to amplify efforts to address the impacts of invasive non-native species, including insects, animals, plants, pathogens, and microorganisms. These efforts include re-convening The NJ Invasive Species Council, created in 2004 but currently dormant, and charging them with updating and implementing a state-wide strategic plan to address the issue. The NJDEP should develop regional collaborations with neighboring states including Pennsylvania and New York and other regions that have addressed this issue. See Appendix F for written testimony to the NJ Senate Environment and Energy Committee in relation to Senate Bill 2186 that bans the sale of nonnative species in NJ. In addition, the proposals* approved by Task Force participants include directing the legislature to do the following - consider passing legislation that establishes and funds a youth conservation corps with a focus on invasive species removal and increase funding for NJ Dept of Agriculture Alampi Lab to expand their work on invasive species control.

**Proposals are included in Appendix E.*

Recommendation 14:

The NJDEP should be directed to measure and reduce deer densities in our public forestlands to ecologically sustainable levels, with guidance from the Science Advisory Panel.* Specifically, the NJDEP should identify and implement new and innovative steps, such as establishing a pilot program for commercial sale of venison, exploring the role of natural predators in deep forests, providing a stable source of funding for hunters helping the hungry, implementing fertility control (including sterilization), and considering revisions to current guidelines on baiting and feeding (i.e., food plots). NJDEP should evaluate these and other steps with public input and report back with recommendations to the legislature within one year.**

**The science advisory panel should consist of experts having appropriate professional and academic qualifications (such as foresters, ecologists, wildlife biologists and biogeochemists) - the panel should be a new committee of the NJDEP Science Advisory Board or be modeled similar to the NJ Endangered and Nongame Species Advisory Committee or NJ Forest Stewardship Advisory Council or similar. There should be no Governor or legislative approvals needed for appointments to move forward.*

***Proposals are included in Appendix E.*

Recommendation 15:

The NJDEP should not include commercial profit as a goal in any forest management plan* on public land. Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.

**Includes Ecological Restoration Plans, Natural Resource Stewardship Plans or other plans on public forested lands*

Recommendation 16:

The legislature and others must identify and implement funding mechanisms to ensure success of the recommendations in this report. Many elements and goals of this framework cannot move forward without significant resources and staffing to NJDEP. All recommendations discussed above require funding in the form of staffing and resources in order to be successful. Funding should include increased appropriations via the annual state budget, new state funding sources, external grant programs, and other government entities that can assist the agency in completing these goals. Specifically and immediately, the legislature/agencies should direct funding from the federal Inflation Reduction Act to advance the initiatives in this framework. Proposals* approved related to new funding sources include increased block rate pricing on water use to recognize the impact of forest protections on availability of clean water; extending the realty transfer fee progression to sales of homes \$1 million and above; reallocation of Green Acres funding to include management activities; tapping carbon markets including RGGI funding; and other federal funding sources.

**Proposals are included in Appendix E.*



NATURAL HERITAGE COMMITTEE

STATEMENT OF PRINCIPLES ON FOREST MANAGEMENT AND RESTORATION FOR PUBLIC LANDS

Introduction

New Jersey is facing increasingly damaging climate related events. New Jersey is one of the fastest warming states and one of the most vulnerable to flooding. As NJDEP Commissioner LaTourette stated in the aftermath of Hurricane Ida, "New Jersey is ground zero for the worst impacts of climate change — period." As part of its plans to mitigate this threat the GWRA plan calls for a 33% increase in carbon sequestration by 2050. Achieving this goal will be challenging. The GWRA 80x50 Report states, "This *optimistic projection*, however, would *require the use of all currently available open space for sequestration*, requiring a major transition in New Jersey's current land use laws and practices." (p. xix) (emphasis added).

A significant portion of this increase will have to come from public forests. Unfortunately, these forests are under attack today by insects, deer, invasive plant species and special interests who are clear-cutting a significant acreage of public lands, based on questionable claims regarding the need to protect selected species, defend against climate change and mitigate carbon loss. In addition to actually reducing overall carbon storage and carbon sequestration capacity these threats also imperil our drinking water, increase flood risks, reduce biodiversity and diminish the use of our public lands for recreation.

New Jersey has no policies or regulations to address these threats to our public lands. We are inappropriately applying regulations promulgated to discourage the development of private forests to manage public lands, resulting in the logging of public forests. Specific policies must be based on clear priorities for public forest management such as maximizing carbon storage and sequestration and the most current peer-reviewed science. We need a better approach, based on the principles of *ecological restoration* as the standard for stewarding and managing public forest lands and to maximize carbon sequestration and we must end the extraction of timber and wood products for virtually any purpose. Stewardship plans must incorporate a transparent stakeholder process; require comprehensive inventories of rare flora and fauna; identification of regulated environmental features such as riparian corridors; and include broad interdisciplinary oversight. In order to ensure these policies are followed they need to be mandated by legislation.

New Jersey Highlands Coalition, as recommended by its Natural Heritage Committee and by New Jersey Forest Watch, propose fundamental principles to guide the development of new legislation and regulations for the stewardship and management of publicly owned forested lands.

The people of New Jersey highly value its public open spaces and in particular, intact forests. Preserved forests are essential parts of a healthy environment providing a number of ecosystem services, including a plentiful supply of clean drinking water and climate change mitigation. Further, public forests offer us abundant opportunities for accessible outdoor recreation, greatly benefiting our physical and mental health. In many cases, forests provide the only viable habitat for a range of wildlife species, including many that are rare, threatened, or endangered. Legislation including the Pinelands Protection Act and the Highlands Water Protection & Planning Act were enacted in large part to protect the ecosystem services of the natural landscape. And the State and many counties and municipalities continue to vigorously purchase open space, regularly increasing the statewide inventory of protected open space.

Current, peer-reviewed science shows that older, larger trees and established maturing forests absorb and store greater amounts of carbon per acre compared to younger forests and continue to do so for hundreds of years. Furthermore, New Jersey's maturing deciduous forests that have remained relatively undisturbed in the last century represent an enormous potential for sequestering carbon over the next century. Outside of the Pinelands, the most productive option for maximizing carbon sequestration is to allow our maturing deciduous forests to continue to mature on their own. If our priorities for managing public lands are to promote biodiversity, maximize carbon sequestration and to ensure the sustainability of the ecosystem, we must *discontinue* the mechanized harvesting of timber from preserved, maturing forests.

Before moving on to specific recommendations for managing public lands in New Jersey, it is important to recognize that the current practice of forest stewardship represents a wide range of activities, from innovative restoration projects, to veiled timber harvesting projects that claim conservation objectives as a disguise to access the valuable timber stock thriving on protected public lands or are based on false narratives such as our forests being at risk from too much carbon and therefore needing thinning. In other instances, the rubric of forest stewardship is misapplied to justify projects that manipulate environments to benefit a single interest. In the development of a framework for the management of public forest lands it is critical that projects without a sound ecological justification be prohibited, such as extracting wood for commercial sale from public lands or manipulating a forest stand's structure to favor a single game species instead of true biodiversity across all species in all types of forests. Instead, new procedures and criteria are required to ensure projects on public lands are in the public's interest and always uphold the public's trust. Standards and regulations to protect other natural resources present on a site must be followed and enforced. This new procedure must consider which practices are appropriate and scientifically justified on public lands, and limited to forestry restoration activities that promote biodiversity, maximize carbon sequestration and ensure the sustainability of the ecosystem.

A major issue in New Jersey today is the cutting or thinning of trees in intact forests outside of the Pinelands. This practice releases most of the carbon stored in harvested trees and compromises a forests' effectiveness to further sequester carbon. Recent studies have shown that logging sites become net carbon emitters for decades before enough regrowth is present to again become a carbon sink.

Logging a site reduces biodiversity and disrupts habitats and natural systems on a much larger scale than the actual area of disturbance. It is imperative that any legislation developed under these principles mandates strict guidelines to prohibit board/feet considerations from influencing forest stewardship plans. Removal of trees must be limited to circumstances when there is an unequivocal ecological objective and a clear conservation goal (e.g., to remove a pathogenic threat, or to quarantine a pest infestation), or as part of the development of structures that directly support the public's use of the park. As already occurs in the Pinelands under the Comprehensive Management Plan, timber removal requires regulatory review and permits. Outside of the Pinelands a specific permit should also be required, and no timber or wood product should be removed from the site unless for quarantining purposes. Leaving felled trees on site provides habitat for a succession of bird, amphibian, insect, fungi and microbial species. Further, use of heavy machinery should be highly restricted and less intense methods such as girdling, which replicates a natural process, should be employed whenever practicable, when the felling of trees is required and justified.

Most regulations protecting environmental and natural resources are essentially compromises, written in such a way as to not overreach to the extent of trampling private property rights, which are constitutionally protected. Private property rights are not a consideration on publicly owned lands. Maximum protection of the natural resource values provided by public lands—preserved precisely because of their natural resource values—must be the standard. Exemptions from regulations that are written to prevent a claim of a regulatory taking of private property simply do not apply on public lands.

We will support legislation that is in accordance with the principles stated here and informed by current forest and climate science, ecology and observations by experts focused on New Jersey with an aim to protect and steward the state's treasured and limited public forests. At the core of this proposal is the urgent necessity for New Jersey to promote ecological restoration of public forests and to end extraction of timber from public forests. To this end, we recommend the establishment of *Ecological Restoration Plans* as a framework to guide practices that address major problems in New Jersey's public forests, which are: the need to maximize carbon sequestration; the control of overabundant deer populations that are decimating the forest understory and inhibiting the natural regeneration of the forest; removal of non-native plant species invading public forests; promoting biodiversity; water production and filtration; air filtration; and compatible outdoor recreation; and the protection of cultural resources. *These are the necessary objectives if the goal is to protect the public's investment in these forests.*

The procedure for developing and implementing *Ecological Restoration Plans* must be by nature interdisciplinary in order that the full suite of natural and environmental resources present on a proposed site are identified and appropriately protected. Comprehensive inventories of flora, fauna and regulated environmental features must be required before a project proposal is written to ensure it is meeting the needs of that particular site and its ecosystem, and that the stewardship activities do not sacrifice any one ecological component in favor of another. This procedure must also include robust and meaningful stakeholder engagement with the public. This will inform the plan's objectives based on local use, local knowledge and expertise, while also eliciting community support for projects to ensure that the public's trust is upheld.

Statement of Principles

- When drafting a legislative framework through which New Jersey protects its public forest lands, we urge the Legislature to start with a findings report of the existing documented threats and emerging concerns for the State's forests. An evaluation of the conditions of forests held by state, county and local government units. The legislative findings report should characterize distinct forest regions in the State as well as the evolution of these regions, including the effects of the deforestation from charcoaling, land clearing and agricultural development and the qualitative differences in forest integrity, such as between forests with undisturbed soils and post-agricultural forests. Such a study should also include an assessment of carbon stocks and the potential maximum carbon tonnage. New Jersey's forests cannot be characterized as one ecosystem, and a one-size-fits-all approach will render any framework or legislation insufficient.
- It is imperative that local government units and land managers be encouraged to develop and implement plans that restore public forest lands. Sources of financial assistance and incentives should be investigated and discussed. The NJDEP could be tasked with helping local government units locate grant funding and interested non-profits or academic institutions with qualified expertise might be enlisted to support this outreach.
- Logging or the removal of any wood product should not be permitted on public lands, except when absolutely necessary to address a documented threat to health and safety, to remove a pathogenic or insect threat, or as part of an ecological restoration project under the jurisdiction of the Pinelands Commission, or for the development of structural amenities that directly support the public's use of the park. The majority of New Jersey's public forests were acquired for preservation and the protection of the natural resources on that land. The commercial sale of timber extracted from public forests contravenes the public trust and runs completely counter to the intended protection of the natural resources on these lands.
- To maximize climate resilience no wood or forest products shall be removed from publicly owned forests. All woody material must be left in the forest as habitat and as carbon sequestered in soil. Invasive, or infected plants, or those that pose a hazard must be managed on site rather than moved and disposed of elsewhere.
- New Jersey must increase its overall carbon sequestration rate by 33% by 2050 if we are to meet our Global Warming Response Act (GWRA) objectives. To meet this critical objective, we must retain as much existing carbon storage as possible and greatly increase sequestration capacity to overcome constantly increasing development pressures. While planting trees in previously disturbed areas is welcomed, this is far less effective than preserving maturing and old growth, which must be the priority. The current and potential carbon storage in our public forests must be quantified.
- One of the most significant pitfalls with the current procedure for preparing Stewardship Plans for public land is that their design and approval is carried out almost exclusively by foresters whose training and expertise is generally restricted to traditional forestry, without requiring an understanding of ecology. Traditional forestry prioritizes a forest's timber productivity. Ecological Restoration Plans on public land should be developed and approved by an interdisciplinary council that includes a diverse expertise related to forest sciences and

interested members of the public. This may include ecologists, a botanists, a wildlife experts, Certified Ecological Restoration Professionals or other qualified persons. Individuals or parties with financial interests in the Stewardship Plan may not participate (a recently approved Woodland Management Plan for a municipal forest in Washington Township, Warren County included the provision of 20% of the income from the sale of timber going to the plan's author/manager).

- Habitat creation by clearing forests should prohibited.
- Current inventories of forest stands for the purpose of Forest Stewardship Plans are not sufficient and often irrelevant to the concerns on public land because they do not adequately quantify any values beyond timber production. The federally adopted Floristic Quality Assessment Index (FQI) should be used to identify all species present and to rank their value accordingly as well as recorded on the national FQI database. Simply identifying a site's threatened and endangered species is inadequate. The site inventory should also designate any areas of native soil and identify tracts of forest that have remained undisturbed since the era of second growth (e.g., cultivated soils, abandoned former settlements, etc.).

Non-native species that are identified in the FQI should be addressed in the management recommendations. Replanting should be restricted to species native to that habitat type. While invasive species management is referenced in current Forest Stewardship Plans, interventions to mitigate the spread are rarely implemented. In fact, in the wake of the mechanized logging of a site, invasive species are generally among the first to re-populate the area, being transported by machinery moving through the forest, exploiting the newly exposed soil.

- Overabundant deer populations—which almost always increase after logging due to the newly available forest edge and increased browse—are an urgent threat to the regeneration of our forests and illustrate the deficiencies of the typical objectives of current Forest Stewardship Plans. Deer management is rarely incorporated into such plans. The phenomenon of “empty forests” is evident all across the State and is driven by overabundant deer destroying the understory of the forest, allowing non-native plant species to out-compete native species (this issue persists on private land as well as State owned forests, with very few exceptions).
- Off road vehicles (ORVs/ ATVs) present an ongoing concern on both public and private land. ORV's regularly take advantage of newly cut logging roads in areas where motor vehicles are prohibited, accelerating forest degradation by severely disturbing soils, negatively impacting wildlife and diminishing the visitor's experience. Discouraging access for this activity is not currently required of a Woodland Management Plan or Forest Stewardship Plan.
- Fire Management is especially important in the Pinelands and can be implemented as a useful tool in a variety of environments. Where fire is part of a restoration plan a detailed assessment of potential hazards should be noted and state-of-the-art surveillance technology included, guided by a state-wide Fire Strategies Plan with robust fire-proofing strategies required. Mechanized thinning has been proven to often result in more intense burns, rather than stop fires and should never be used outside of specifcly appropriate areas such as

designated sections of the Pine Barrens. There is no justification for setting a minimum acreage for prescribed burns in New Jersey.

- Monitoring of environmental conditions is vital on public land and needs to be expanded. All proposed projects should be available for review and comment online, including regular updates on the results and achievements of implemented restoration plans (not merely activities completed) and serving to inform future projects on similar landscapes or facing similar threats.

The New Jersey Highlands Coalition and the NJHC Natural Heritage Committee wish to have a continuing constructive dialogue towards drafting urgently needed legislation establishing an effective program for the stewardship of New Jersey's treasured public forests, to meet the state's climate and biodiversity objectives and to protect the public's trust and investment in its forests for now and for future generations.

**Report to the Joint Senate Environment & Energy
and Assembly Environment & Solid Waste Committees
March 15, 2023**

We are writing this report to provide a different perspective on the “consensual framework” as provided by the NJ Forest Task Force (FTF). Who are “We”? We are: The member organizations of the New Jersey Highlands Coalition; we are the individual members of the Coalition’s Natural Heritage Committee, which is a gathering of organizations, interested individuals and credentialed science professionals who seek to recommend the most appropriate and protective strategies and policies for New Jersey’s heritage species and habitats for public lands with a non-exclusive focus on the Highlands region; we are also the individuals and organizations who have participated in the FTF and believe there is more knowledge and recommendation that should be shared with the Legislature at this time than the sixteen recommendations reported by the official NJ Forest Task Force to be the basis for a consensual framework.

Our report builds on the substantial body of information and knowledge we have compiled, which informs our attached policy recommendations (and which is appropriately cited in the Recommendations section of this document). Because of the climate crisis, it is imperative that we quickly adjust how we view our publicly owned forests—but do so wisely and informed by science. That is the reason we are providing this alternative report. It would be inaccurate for anyone to characterize this as a *minority report*, because there was no direct polling by the FTF to establish which side one aligned with—traditional forestry or ecological restoration. We believe we very well may represent a majority.

Why have we prepared this report? The FTF was charged to *“identify and debate the major issues and ultimately develop consensus solutions which could form the basis for future legislation”* (emphasis added). There was, however, very little debate in the FTF’s process, particularly on the most controversial and divisive subjects of mechanized cutting and clear-cutting of mature, public forest and of wood removal.

Although there were two FTF meetings at which proponents of proforestation were provided with a limited opportunity to present their views on a complicated issue, followed by counter presentations by foresters, and then FTF participants were allowed to ask clarifying questions, such a forum could hardly be called a robust debate about logging. By not debating this issue, aside from failing to fully respond to its charge to do so and to address climate change, the FTF missed a critical opportunity to better inform participants about these matters. Although many FTF participants were committed to one or the other side of this issue, there are also many participants who remain undecided. There are also no shortages of misunderstanding and misinformation surrounding the issues for which a moderated, thorough debate could have provided clarity, perhaps also providing those who were undecided ample facts upon which to draw a conclusion. Many of us share the opinion that the FTF leadership intentionally suppressed debate on this issue. The FTF leadership was unexpectedly weighted in favor of a

more traditional forestry approach to forest management. **Proforestation is a newer concept that is responsive to the carbon sequestration values of the forest's ecology and diminishes timber value as the primary lens through which to view forest health.** If the legislature were to direct the NJDEP Commissioner to promulgate regulations that elevated proforestation to a primary goal in its management of mature public forests, the NJDEP would be required to make significant changes in how public forests are managed and how forest stewardship plans are approved. Similarly, non-profit organizations, such as New Jersey Audubon, which have fee-for-service programs and receive grant funding to write and implement forest stewardship plans would also be required to significantly modify their operational models when proposing work on public lands—including the work that is currently underway at the Sparta Mountain Wildlife Management Area.

What is the difference between *ecological restoration*—a relatively new concept of forest management, which draws heavily upon the principle of proforestation, and traditional forestry? Ecological Restoration considers the primary ecological components of the forest: water resource production and storage; biodiversity; soil complexity; compatible human recreation; and carbon capture and storage, to be of equal importance. Traditional forestry, on the other hand, elevates timber production as the primary focus. A healthy forest to a forester is one that maximizes board/feet numbers. Sustainable forestry seeks to maintain high productivity of wood products in the long term. As mitigation for greenhouse gas emissions becomes a greater concern, public land managers would more appropriately turn to a practitioner of ecological restoration, a forest professional who employs the principles developed by the Society for Ecological Restoration.

We hope you agree that *climate change* must more fully inform the management of New Jersey's public forests than it does today. To avoid worsening the climate crisis and to improve climate resilience, our public forest policies must: stop cutting mature native trees; stop clearing the canopy and stop removing logs; and most importantly, stop clearing old forests to grow young forests. **The scientific proof for larger, mature trees sequestering the most carbon is unequivocal.**

A significant accomplishment of the FTF is the recognition that the NJDEP is managing State-owned forests without formal regulations adopted pursuant to the Administrative Procedure Act, as it was directed several years ago by the Legislature. They are also approving Forest Management Plans (FMP) for county, municipal and non-profit owned lands, despite these FMPs being defined in the regulations as applicable only for private lands— clearly misapplying the criteria used for a private property owner to qualify for an agricultural tax assessment. This acknowledgement came after we provided a deeply detailed, written analysis of the NJSA Title 13 statutes and the adopted NJAC Title 7 regulations to the Regulatory Subgroup of the FTF.

Given that the Department is approving and implementing FSPs/FMPs without duly adopted regulations, without a mandate from the Legislature, and without any accountability to the public, a moratorium on the approval of new FSPs/FMPs and on the implementation of the remaining phases of approved plans until rules could be promulgated is appropriate.

Although we support more of the individual recommendations of the FTF Framework than we oppose, the New Jersey Highlands Coalition decided not to sign on to the Framework because it is written with such vagueness that, depending upon how certain terms are defined or interpreted, forest management under the status quo, such as the current Sparta Mountain FSP, would likely continue unchanged and without any increased emphasis on climate resiliency. Maintaining the status quo, to continue with a forestry-centric management of public forests, appears to be an unacknowledged bias of the majority of the FTF leaders.

It also should be noted that some organizations that have signed on to this Report chose to sign on to support the NJFTF's Framework. They believe the Framework is a good starting point, but also believe it could have gone further and they also support the further direction we provide here. *This Report and the NJFTF's Framework are not mutually exclusive.*

On the Framework, Recommendation 15 states: *"The NJDEP should not include commercial profit as a goal in any forest management plan on public land. Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals."* The goals of the Sparta Mt Wildlife Management Area Forest Stewardship Plan have *never* been expressly for commercial profit. DEP's stated goals for mechanized harvesting and removal/sale of wood products, on public lands, are always assigned an ecological basis such as habitat manipulation, or to reverse "mesophication." However, our concerns have consistently been that the ecological damage caused by mechanized harvesting is most often greater than the intended goal of the project. On county, municipal and non-profit owned lands that are subject to Green Acres jurisdiction, Green Acres Rules require that any activities or management must be in service of recreation or conservation. The commercial harvesting of wood is prohibited, but mechanized harvesting is permitted if for conservation purposes. Again, the negative ecological impacts outweigh the stated ecological benefit, or conservation purpose. We insist, that at the very least, before approving any management operation, even when an ecological goal is claimed, that there be a comprehensive impacts analysis that demonstrates a net environmental, or ecological benefit.

Commercial profit should never be the goal of public lands management, of course. Moreover, the sale of wood products should *not even be a component* of public lands management under any circumstances because board/feet considerations place a financial value on timber extraction when the only considerations should be ecological restoration and climate mitigation. When the public land manager has to ensure that the operation is large enough to be profitable for the logging contractor, the ecological goal is corrupted. Further, except in very limited circumstances, felled wood should be left onsite because of the generations of habitat it provides, it also replenishes soils and wood carbon is transferred to soil carbon. The machinery and access roads needed to transport the logs are destructive to many ecological components of the forest.

We fully appreciate that these are controversial matters that require a serious and robust discussion and debate. We have been encouraged by some of the FTF leaders to press for this

debate after the work of the FTF concludes, when the legislative process is underway and during discussions with bill sponsors and during committee hearings. Another opportunity will emerge when regulations are promulgated, during stakeholder outreach and public comment. But we believe the NJ Forest Task Force was established as the forum for non-governmental, public, professional and stakeholder engagement and debate. Having avoided a meaningful discussion on this topic, the FTF's work is incomplete and the public's understanding of the issues diminished.

Getting our public forest policies in order in response to the changing climate is a State agency priority per Executive Order and because it is critically important. That does not mean diminishing the importance of water resources, biodiversity and recreation—but we must recalibrate public forest policy considering the demands of climate mitigation—and, once we do, our many groups believe that the ecological values of water resource production, biodiversity and recreation will be maintained and naturally fall into the proper balance.

Our proposed recommendations for state legislation for the management of public forests are outlined below.

We address deficiencies in the NJ Forest Task Force's policy recommendations, which are curiously silent on recommending policies that address climate mitigation and true ecological health, which include ending wood removal from public forests, ending the use of heavy, mechanized logging equipment, and sharply restricting the clearing of forest canopy of native trees in public forests.

We include citations in support of these principles. We hope you accept this report in the spirit it was intended: constructive and thoughtful. And we welcome your thoughts, questions, and concerns.

Thank you, Chairman Smith, Chairman Kennedy, and members of the Assembly and Senate Environment Committees, for your leadership as we work together to protect what today's science tells us are some of New Jersey's most effective tools to mitigate the impacts of climate change, as well as what has proven to be extraordinarily important to the public's mental and physical health: our public forests.

Recommendations

A. Incorporate New Jersey's climate defense initiatives into the management of public forests

As a primary principle, all of the State's public forests must be classified as **Climate Defense Reserves** (CDRs), an integral element of the New Jersey climate defense strategy, alongside the other elements specified in the *80x50 Global Warming Response Act Report of 2020*. The survival of subsequent generations will depend on how quickly we respond to the climate crisis, by taking the responsible steps we can take today.

The public forests of northern New Jersey are particularly important CDRs because these forests substantially outperform in their delivery of climate defense services critical to all the communities across the northern region of the State and beyond.¹

CDRs deliver ecosystem services for both greenhouse gas (GHG) mitigation and climate adaptation. (Note: Managing public forests as CDRs is compatible with continued management for water resource production and storage, biodiversity, recreational, cultural, and educational services).

- Net GHG emissions mitigation services are critical now and at least across the next few decades, until we decarbonize the global economy.² CO₂ increases in the atmosphere will persist for centuries.
 - The 80x50 report estimated that natural land carbon sequestration offsets 8% of NJ GHG emissions in 2018. *Once NJ achieves 80x50, NJ natural land carbon sequestration will be offsetting 33% of NJ GHG production.*³
 - Protecting and strengthening carbon capture and storage capability provides the highest return-on-investment available to New Jersey.⁴
 - Mature forests represent the highest rates of carbon capture and storage and annual carbon sequestration among all terrestrial systems.⁵
 - Public forests comprise half of New Jersey forests.
 - Public forest carbon management is in the top tier of public domain net GHG emission mitigation actions available to NJ.³
- Climate adaptation services must be meaningfully protected *now* to minimize the impacts of climate disruption.
 - Forests carry a major role to intercept and infiltrate the increasingly heavy rainfall as experienced in events like Ida in 2021. They are 40% of NJ's rainfall catchment area (one half of which is public forests)⁶.

¹ [Resilient Land Mapping Tool](#) The Nature Conservancy

² New Jersey's Global Warming Response Act 80x50 Report – 2020

³ New Jersey's Global Warming Response Act 80x50 Report – 2020 p. xix

⁴ Griscom, B. W., J. Adams, et al. 2017. Natural climate solutions. PNAS 114(44): 11645–11650

⁵ Mark Anderson Wild Carbon: A Synthesis of recent finding on Carbon Storage in Old Forests – International Journal of Wilderness – Dec 2021

⁶ New Jersey State Forest Action Plan – 2020

- Forests reduce and slow runoff that otherwise makes flooding more acute.
- Forests filter and infiltrate drinking water.
- These same forests are NJ's reservoir for biodiversity, the basis for ecosystem resilience.
 - NJ ecosystems already damaged by 19th and 20th century development must be managed through the major additional stresses of climate change.

B. New Jersey Public Forest Management, Specific Recommendations

A growing scientific consensus based on a growing body of recent research leads to the following recommendations regarding public forest management practices in the forests of northern New Jersey (i.e., forests outside of the Pinelands Reserve):

1. Mechanized harvesting of mature native trees in public forests shall be prohibited.
 - Mature forests capture, store and annually sequester the most carbon both above and below ground.⁶
 - Mature forests intercept and infiltrate the most stormwater.
 - Interception is proportional to leaf area.
 - Infiltration (sponginess) is proportional to surface litter and soil biomass.
 - Mature forests host the broadest biodiversity.⁷
 - Older forests develop more diverse micro-environments both above and below ground.
2. Deadwood in public forests shall be kept in place unless safety dictates that it be moved— but it should still be retained in the forest unit.
 - Deadwood is an important carbon store, and as it decomposes over the decades, it is an important habitat and food resource for the ecosystem and replenishes forest soils.⁸
 - Standing snags are important wildlife habitat.
3. Cutting trees for safety reasons may sometimes be warranted.
 - Felled wood must remain on site.
 - The wood shall be managed as deadwood as stipulated here, but removal may occasionally be warranted, e.g., for Asian Long Horn Beetle treatments.
4. Heavy equipment shall not be used off-road in public forests and natural areas except in limited circumstances and unless on weight-distributing panels.

⁷ McMahon, J.S Biodiversity: The Language of Wilderness Northeast Wilderness Trust – 2021.

⁸Table 1. Anderson, Mark. Wild Carbon: A Synthesis of recent finding on Carbon Storage in Old Forests – International Journal of Wilderness. Dec 2021.

- Soil compaction causes severe damage to the soil structure;⁹
 - Ruts and depressions when filled with standing water are mistaken by amphibians as vernal pools;¹⁰
 - Disturbed soils attract invasions by non-native species.¹¹
5. Early successional habitat projects shall be prohibited in mature public forests, but acceptable in already disturbed areas such as utility rights of way, abandoned farmland, etc.
- Cutting to convert mature forests to early succession habitat to protect forest edge species (e.g., golden winged warbler) causes corresponding losses of the habitat required for forest interior species (e.g., wood thrush).¹²
 - Contiguous mature forest habitat is already exceptionally scarce in New Jersey.
 - The majority of forestland in New Jersey are forest fragments, or patches of forest smaller than 1,000 acres.
 - Only 47% of forests have interior forest conditions.¹³
 - The carbon cost of converting mature forest to early successional habit or other logging-as-management strategies will take several decades to recover to a condition of positive carbon sequestration and will always result in a decline in sequestered carbon.
6. Deer management in New Jersey will require a commitment to innovation to bring the deer population down to sustainable levels.
- Overabundant deer are a primary threat to New Jersey's public and private forests.
 - Forest regeneration in many forests is suspended because native saplings, shrubs and ground plants cannot grow due to deer herbivory.
 - Invasive, non-native plants take over and block regrowth of native forest flora because of the deer's preference for native species, from tree seedlings to trilliums.
 - Research has found that native plant communities will rebound when a deer population is held to sustainable levels.¹⁴

⁹ Adams and Froelich Compaction of Forest Soils Pacific Northwest Extension – 1984.

¹⁰ Calhoun, A. J. K. and Klemens, M.W. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society, Bronx, New York.

¹¹ Forest Vulnerability to Invasion by Exotic Plants Northern Research Station USFS.

¹² New Jersey Endangered and Threatened Species Field Guide Conserve Wildlife Foundation of New Jersey

¹³ Restoration and Resilience in New Jersey's Forests Forest Guild

¹⁴ Almendinger, Van Clef, Kelly, Allen, Barreca. Restoring Forests in Central New Jersey through Effective Deer Management. Ecological Restoration – Dec 2021.

- NJ should cease all current programs that encourage increases of deer populations or provide deer habitat.
 - Creating early successional habitat encourages increased deer populations by providing the edge habitat deer prefer.
- 7. NJ Invasive Species management requires a strategy and plan for timely and efficient control of emerging and threatening invasives and also containment of widespread invasives.
 - Important elements include establishing an Invasives Species Council and collaboration with neighboring states and private organizations.
 - The NJFTF Invasives Species work group, which includes members working on this report, has documented suggestions and is working with Senate staff on legislation.

C. New Jersey Public Forest Governance Recommendations

1. The Legislature, based on principles outlined here, will direct the NJDEP to pursue a transparent and publicly engaged process to amend New Jersey's Forestry rules at NJAC 7:3 to include rules and regulations specifically pertaining to forest stewardship plans for publicly owned forest lands, including state-owned forest lands, as authorized by Section 13:1L-36.
 - The NJFTF regulatory subgroup agreed with our analysis that determined that "The NJDEP has not adopted any rules and regulations, pursuant to the 'Administrative Procedures Act', for forest stewardship plans for publicly owned forests in NJ ..., other than the Pineland Comprehensive management plan rules at NJAC 7:50 and New Jersey's Natural Areas System rules at NJAC 7:5-A."
2. Pending DEP's adoption of rules for the management of public forests, there shall be an executive order, or a legislative mandate, or an Administrative Order, prohibiting approval of any new public forest management or stewardship plan and the suspension of activities of any approved forest stewardship or management plans for public forests.
 - Future phases of existing, formerly approved plans shall require approval per the new rules.
3. The Legislature will clarify that the Exemption under the Highlands Water Protection and Planning Act for forestry activities approved by the State Forester is only applicable to privately-owned lands.
4. Similarly, clarification that the permit-by-rule for forest stewardship activities under Freshwater Wetlands Rules at NJAC 7:7A-2.4(d) et al and Flood Hazard Area Control Act Rules, Permit-by-Rule 26, at NJAC 7:13-7.26 are intended exclusively for privately owned lands and do not apply to publicly owned forests.

SIGNATORIES

Organizations:

**New Jersey Highlands Coalition
NJHC's Natural Heritage Committee
The Watershed Institute
Raritan Headwaters Association
Pinelands Preservation Alliance
Turtle Clan of the Ramapough Luunape Nation
Sourland Conservancy
Passaic River Coalition
Great Swamp Watershed Association
Great Egg Harbor Watershed Association
New Jersey Environmental Lobby
New Jersey Environmental Education Fund
Alliance for Historic Hamlets
Morris County Trust for Historic Preservation
Ridgeview Conservancy
Thonet Associates
Princeton Environmental Commission
Sustainable Madison Advisory Committee
Friends of Drew Forest
UU (Unitarian Universalist) Faith Action Now
New Jersey Student Sustainability Coalition
Woods & Wayside International
Wander Ecological Consultants**

And the following individual members of the New Jersey Forest Task Force:

Jeanne Fox	Erica Johnson
Leslie Sauer	Joseph R. Attamante
Patricia Shanley, PhD	John Saponara
Chief Vincent Mann	Sharon Wander, PhD
Chris Hepburn, PhD	Hugh Carola, Program Director, Hackensack Riverkeeper
Paul Rinneer	Sara Webb, PhD
Nicholas Homyak	Margaret Wood
Hon. Bill Cogger	Douglas Meckel
Wilma Frey	Susan Michniewski
Eve Coulsen	Thomas Koven
Kyleigh Tangen	

As our understanding of woodland ecosystems evolves - The preservation of old trees is recognized as essential both to the wildlife and for the benefits of climate stability.

Forestry plans can no longer consider removal of old established trees and replacement with young trees a benefit to the ecosystems they create.

Shauna Canter
President Garden Club of Mount Tabor

329x

Having worked with Madison's trees for the last 20 years, please consider that the removal of any mature native trees, which can never be replaced in our or the next lifetime, provides so much value to the environment, i.e. removes air pollution, helps filter water to the aquifers, supports wildlife and more.

Any government measures that would allow removal of such trees should be prohibited.

Thanks, in advance for your support of keeping mature native trees,

Gene Cracovia, Chair of Madison's Shade Tree Management Board
Madison, NJ

330x

Comments on NJ Forestry Task Force Framework Recommendations

These comments focus on the lack of substantive and useful recommendations to address climate change in the Framework. This was a top priority of the task force.

The purpose of the task force was *"to study and identify ways in which the State can best manage its forests in order to **fight climate change**, prevent forest fires, improve ecosystems, and protect soil and water quality."*

As one can see from the Framework recommendations **there were no substantive and useful recommendations to fight climate change** – the first item on Senator Smith's list of goals. The Framework never even acknowledges the link between cutting and removing trees and how these impact carbon storage and sequestration.

Recommendations were not based on any quantification of the existing or necessary increase in carbon sequestration called for in the Global Warming Response Act 2020 Report. There were no estimates of carbon storage and sequestration from public forests, no estimates of the amounts lost to logging and no estimates of the amounts that could be achieved through proforestation. The Framework states, "Carbon reserves should be defined similar to 'ecological reserves' in the Natural Areas Program as areas managed to allow natural processes to proceed with little or no habitat manipulation." This is basically saying we should set aside certain areas for carbon reserves, but not our entire public forest area. But as stated above, the task force participants have no idea as to the volume of carbon sequestration needed from public lands and thus this is a meaningless recommendation. There is no way to know if it is even possible to achieve the goal with all public forests designated as reserves. The GWRA 80x50 2020 report characterized the total land sequestration increase goal as an "optimistic projection, requiring the use of **all currently available open space for sequestration**, [and] requiring a major transition in New Jersey's current land use laws and practices," (emphasis added). This does not sound like a problem that can be resolved with a few carbon reserves. The Senate and Assembly Environmental Committees must find a way to "get the math" on public forest storage and sequestration and then determine the pathways to meeting the GWRA goals and also look at what it would take to maximize sequestration. **Deciding on management techniques before understanding the goal is putting the cart before the horse.**

Recommendation 10 states:

NJDEP must protect and manage NJ's public forestlands to maintain

and enhance carbon sequestration and storage as necessary to advance state climate goals.

This is fine, but the recommendation provides no implementable actions to make this happen and no methods for measuring and managing it. It just says this should be guided by science and the inventory and planning process. It also provides no method for prioritizing this goal if and when it comes into conflict with other goals in terms of resources. Do we really need a recommendation that just tells us to follow the law?

Most egregious is the inclusion in the Framework of Recommendation 15 which states:

Commercial timber management should not be a goal for any forest management plan on public land. However, **Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.**

Make no mistake - this benign sounding statement (Wood products can be sold...) **means mechanized logging and wood removal on a significant scale.** There is no other way to obtain wood products.

This recommendation implies that an approved plan to create wood products (aka logging) could have climate goals. However, during the task force meetings **no peer-reviewed science was ever presented to support this position.** Instead there were at least a dozen peer-reviewed papers and other summary articles that clearly demonstrated just the opposite; that logging harms the climate by increasing CO2 emissions and decreases carbon sequestration. If the task force leaders want to keep this assertion in recommendation 15 they must produce the science to support it. Otherwise, the insertion of climate as a potential benefit from logging in recommendation 15 is simply gratuitous.

The Framework also fails to define "ecological health," leaving the door open to being anything that the DEP and its partners say it is, thus offering no control over projects claiming to have this objective. If any plan's definition of ecological health ignores the value of leaving cut wood in place to allow it to return its carbon to the soil, then it can be removed and sold, further reducing carbon storage.

Recommendation 15 also **undercuts efforts to fight climate change** by increasing carbon emissions from tree cutting and removal thus reducing future

sequestration. We would, in fact, agree with this recommendation if it was restated as: **Where trees are cut as part of an ecological restoration plan conforming to the Guidelines of the Society for Ecological restoration, the wood and forest products should be retained on site to maximize carbon storage and soil formation.** Keeping cut wood on the ground is the best way to prevent carbon from escaping into the atmosphere and maximizes its reabsorption into the ground. Despite a long proposal explaining this, the task force leaders ignored this science.

The framework also fails to recognize that maximizing carbon through proforestation also addresses many ecological issues and protects water, soil and other values of public forests such as conservation and recreation. Instead It sets up carbon protection as separate from those other benefits and argues for other techniques to address those issues, which creates a false dichotomy as to beneficial management actions. This is due simply to the lack of analysis of the science on the part of the task force.

Ken Dolsky

New Jersey Forest Watch
2/22/23

Comments on the NJ Forest Stewardship Task Force Report

Dear Senate Environment & Energy Committee/Assembly Environment & Solid Waste Committee members:

Upon the formation of the NJ Forest task force, the thinking was that, finally, actual science would be considered that might put an end to, or at least minimize, the abuses that are being carried out on our public forests all under the greenwashing guise of "ecological health." I will say that the task force was a failure in that it certainly did not meet its mission. We are just about where we were before the task force commenced its "work," and if the status quo is codified, we are worse off.

After 7 years of trying science and diplomacy, I will risk being blunt. Sadly, the term "agency capture" fits our current DEP, particularly the Div. of Fish & Wildlife which should be renamed the Div. Of Game & Timber. We currently have no state government agency protecting our ecosystems and native wildlife. The so-called Div of Fish & Wildlife is breaking Federal Wetlands laws, destroying important ecosystems and the habitat of the wildlife they are charged with protecting. They are manipulating mapping data and cherry picking species which they claim to be "at risk" if the habitat of these species suits their misguided purposes. Employees at DEP have been "muzzled" and have been told not to use the term "logging." It's a prime example of "agency capture" complete with greenwashing "non-profits" as collaborators.

What good is a "task force" if so many of these players are participating in or chairing it and controlling the outcome?

On to the task force itself-

The process kept changing, and went from bad too worse, in what became an apparent attempt to favor the status quo of logging interests who should not have been on the task force to begin with. The task force work was to be grounded in peer-reviewed science, as stated at the outset, but rather, it became an obvious exercise in controlling the debate and squelching the science in an attempt to reach a non-existent vague consensus. It steered NJ in the direction of codifying what is currently happening to our highest quality public forests: illegal logging that is causing irreparable damage to ecosystem services, biodiversity, climate resiliency, carbon storage capabilities and water quality.

The following concerns were glaring:

- People representing organizations that profit from extracting timber from public forests should not have been chairing and controlling this task force, let alone writing the framework!

- The processes and voting methods kept changing to suit an outcome. Pro-logging individuals were added to the task force halfway through. Voting became "surveys" that were written by the co-chairs. (The scales were not balanced as to the co-chairs.)

- For the sake of transparency, it was suggested that participants reveal their affiliations if they had vested or financial interests. The co-chairs quickly dismissed this suggestion.

- Because current management plans are being carried out illegally, it was suggested by several that a moratorium on logging be put in place until we get this sorted and reasonable rulemaking is achieved. This was also shut down by the co-chairs.

-Science was to be at the root of the task force. Many of us worked on proposals and gathered peer reviewed studies to back them. If our proposals were selected by the chairs, we were told, they would be presented and discussed. That didn't last. It was decided that "reaching consensus" was more important than the science. Many of our proposals were key to making informed decisions, yet they never saw light of day.

-Conflicted parties gave presentations in which statements were made and interesting and creative bar graphs were shown. These statements and bar graphs are hearsay without credible peer reviewed science!

-With the science now swept away, and the goal of "reaching consensus" (based on what I don't know), the chairs sent out surveys written by them. Repeated requests to define/clarify terms in these surveys like "management" and "ecological health" were ignored. These terms are currently and very inaccurately being used to falsely justify current logging or "management" plans and to create loopholes.

The co-chairs also wrote the framework which contains recommendations with important terms still undefined:

-Recommendation 15 -This is extremely problematic. This creates the loopholes for the status quo. The DEP has been claiming for years now that there is no commercial profit as a goal and that they are logging for ecological health. It has been and is being driven by grants & funding. Trucks with Canadian plates are driving through our forests. Wood is going to the large Wagner sawmills out of state where it is being processed and exported to Europe and China. The claim is that they are creating "healthy" forests or habitat for game birds and a warbler, yet habitat is being destroyed for rare plants and the actual resident rare/threatened/endangered species that are important to forest health. Wood extraction is not necessary or beneficial if the true goal is ecological restoration.

-Recommendation 1- In spite of the request to appoint independent non-government (non-DEP) scientists to the "Science Advisory Panel," the final framework sets up a new DEP committee similar to Endangered and NON-Game Species Advisory Committee which interestingly currently has a strong focus on... game species rather than non-game. A committee under DEP or including their staff would no doubt toe the line for timber extraction. SER (Society of Ecological Restoration) independent forest restorationists must be appointed, lest we appoint the government entity that is to date the cause of this problem and the cause for the creation of this task force!

-Recommendation 5- calls for afforestation and reforestation. Afforestation can be performed on degraded public areas such as post agricultural lands and reforestation can be used to create monoculture tree plantations which are not forests and have little ecosystem value. There was much talk of proforestation, which allows for management, but with no extraction of wood. A forest ecologist of world renown presented his studies to the task force, yet proforestation never appears in the framework. Why? Because timber extraction is not the goal of this type of management!

-Because the framework contents were never defined or properly discussed, this created a situation whereby people were forced to "vote for the whole framework or vote against the whole framework." The claims of a "supermajority" are false, as many voted for it because they

agreed to only 2 points, for example. Others voted against it because they could not support one or two.

The overall problems with the framework are that the process was skewed and without definition, clarity and oversight it changes nothing. It makes things worse. The manipulation of the process and the voting make it apparent that the intent is to pave the way for the codification of plundering NJ's public lands.

Please heed the recommendations that are grounded in ecological restoration which do not include extraction of wood product. There is plenty of wood being extracted from private land without giving private interests carte blanche to plunder our best public forests. In the interest of climate storage/resiliency and biodiversity, the best management is performed while wood/carbon stays in the forest.

Sincerely,
Katherine Evans
NJ Forest Task Force participant
Co-founder NJ Forest Watch
NJ Highlands Coalition Natural Heritage Committee member
VP, Friends of the Sparta Mtns.
Worked for: Massachusetts Audubon
NJ Environmental Federation/Clean Water Action
NJ Div. Of Parks & Forestry

I am writing in opposition to the NJFTF's proposal regarding a logging plan for mature timber on public lands.

Mature, native trees are our best defense against climate change. They are an irreplaceable carbon storage resource that should be preserved and protected. Once cut, that resource is gone for decades. Right now, we need every resource available to meet NJ's climate goals and preserve our environment for future generations.

Mature timberland is also very important for the preservation of wildlife habitat. Birds in particular have declined drastically in New Jersey because of habitat loss. Further, New Jersey serves as a pathway northward for species, both plant and animal, to move and survive as their current habitat is lost to a warmer, drier, more fire-prone environment. Future shifts and losses have been modelled and mapped for native tree species by the US Forest Service and The Nature Conservancy, showing northern NJ to be a critical corridor for preventing extinctions.

Sincerely,

Mary Ellen Hennessy-Jones

Member, Sustainable Madison Advisory Committee; Member, Madison Climate Action Committee

ClimateTech Investor

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March 15, 2023

Senator Bob Smith, Chairman
Senate Environment and Energy Committee

Dear Senator Smith:

I was a faithful participant in the NJ Forest Task Force Meetings and this is my input as an individual.

I have signed on to, and heartily endorse, the NJ Highlands Coalition's Report to the Legislature. That report is comprehensive so I will just add some personal perspective here.

First, serving on the Task Force was the single most frustrating and depressing work/volunteer experience of my life. I would not volunteer again to work on anything to do with the DEP or public policy. I will continue to work to preserve land in the Ridge and Valley region, to see to the stewardship of that land, to steward my own 200 acres, and to teach others about invasive plant control and habitat restoration. I will spend countless hours and dollars protecting my native trees from deer that the state DEP apparently finds to be at an acceptable level in my region.

The four Task Force chairs are intelligent and earnest people who worked very hard, but they were in no way qualified or prepared to deal with their task, namely moderating a scientific debate about the merits of forest management that involves cutting and removing trees (purportedly for habitat improvement) *versus* keeping heavy equipment out of the forests, and not cutting down mature native trees. This was, and has been, THE point of contention and it is a question informed by scientific research and analysis.

Although at first we participants were told that the Task Force would be science-based and to attach references to our proposals, with peer-reviewed scientific articles being weighted the most, in the end we were told that *the Task Force would not be delving into the science*. There were a few relevant presentations, but no chance to actually debate the merits which would require getting into the scientific articles (on top of that, the proforestation side was given less presentation time overall and less time to answer questions). Instead we were treated to long, general, presentations, several by DEP personnel, and given poorly-worded surveys to answer.

I hope that you and other legislators will read the recent article: Frontiers | Forest-clearing to create early-successional habitats: Questionable benefits, significant costs (frontiersin.org) (Summary below). Besides making the case against forest clearing, it helped me to understand how the practice first got started and took off. Important reading!

In 2008, my friends at NJ Audubon began guiding me through habitat restoration on my property of woods, fields and ponds. Together we did great work there, and at the Drew Forest in Madison. Then they began telling me about the clearing projects to benefit Golden-Winged Warblers and even proposed one on a large woodland I purchased. So I've walked forests with John Parke and Don Donnelly (both then at NJ Audubon), and heard their, and Sharon Petzinger's, spiels at Sparta Mountain. I asked for scientific support for their approach given that no other ecological types seemed to support it. I read everything they provided - overwhelming *not* peer-reviewed science - but found it unconvincing.

To this day, I have yet to see a study that measures a baseline for interior-forest-dependent birds like Wood Thrushes and Red-Shouldered Hawks and then evaluates *them* following the clearing projects. I

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have seen nothing to counter research showing long-term negative consequences on biodiversity from soil disturbance, such as happens whenever trees are removed (dare I say 'logged'?). What I did hear, repeatedly, from my Audubon friends was that they had come up with a 'win-win': habitat for Golden-Wings plus money from the wood to fund good work. I am a Lifetime Member of NJ Audubon due to my support years ago but now disavow any association with them.

I believe that the folks at NJ Audubon and others are sincere in pushing for misguided habitat-improvement, but then, as Upton Sinclair said, *"it is difficult to get a man to understand something when his salary depends on his not understanding it."*

I could go on an on, but will not. I hope that you and other legislators, and DEP personnel, will all read the article cited above and also the book ,full of research results, Nature's Temples, by Joan Maloof, a new edition of which is available in April.

Thank you for your attention to this letter. And, a huge thank you for your years of environmental advocacy in the legislature. You are much appreciated.

Best regards,

Christine Henburn. Ph.D.

Trustee, Ridge and Valley Conservancy, Friends of the Drew Forest
Former Trustee, Morris Tomorrow, The Land Conservancy of New Jersey, The Great Swamp Watershed Association, the NJ Highlands Coalition

My Task Force proposal is on page 144 of the TF Report.

My other proposal - that all participants reveal what financial dealings they have with anything having to do with forestry on public lands - was soundly (disturbingly) rejected by the Chairs.

NJ State Senate Environment and Energy Committee

Honorable New Jersey State Legislators

NJ Forest Task Force: Comments/Concerns/Disappointments

Subject: Attempted Minority Rule, Ignoring The Science, Rejecting the Paradigm of **Proforestation, and attempt at one last loophole for loggers.**

Ecological Health/ The opposition to the #15,#14 Goal/Objection

The ambiguous term clearly needs to be defined. There are many siting of this term "ecological Health" through the 274 page report; in my opinion used a trap/tool in contradicting language and within the same paragraphs to entrap one's opinion or having one abstain in favor of the logging of public forest by private interest.

My (Nicholas Homyak) contention on ecological health as a ploy-inappropriate reason to intrude and disturb a Public Forest.page 68 of 274. Hold my remarks here to be true to the NJFTF experience.

15. Is double talk. logging for ecological health, is absurd. The disturbance of ingress and egress and the required disciplines of any work force will surely injure and further contaminate any public forest remaining. Any disturbance should be for invasive curtailments and natural enhancements where the effort and cost would be worth it.

The Task Force overall has slipped away from the major background of it's intention. Climate Change or the role Forest can and do play in climate mitigation, through their ecological services and powers of Self-Organization. Proforestation a Must!

The Trap to catch and implement a loophole for logging.

Mark only one oval. 4-choices. Voting Choices

Cutting trees should never be permitted

Cutting trees is an activity and/or tool that can only be used as part of an approved plan so long as the objective pertains to the overall ecological health (current & future) of that particular forest.

Cutting trees is an activity and/or tool that can be used as part of an approved plan for a variety of objectives, including the generation of revenue for the NJDEP.

Abstain

Here we see the built in contradiction in the same paragraph.

14. Forest Management Planning and Implementation: Commercial timber management should never be the goal for any forest plan on public land. **Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate or other noncommercial goals.**

Ecological Health definitions: and other important words and meaning necessary to understand our background of climate change and loss of biodiversity.

(1.) Ecological health differs from ecosystem health, the condition of ecosystems, which have particular structural and functional properties, and it differs from ecological integrity, which refers to environments with minimal human impact, although the term ecological health has also been used loosely in reference to a range of environmental issues. Human health, in its broadest sense, is recognized as having ecological foundations.

So allowing some form of logging in "Public Forest" would be some type of ecological health in an economic sense to the logging interest, and it's future, over that of forest remaining as Carbon Sinks and Photosynthetic Zones.

(2). Professor Emeritus Tom Wessels. American terrestrial ecologist working as a professor at Antioch University New England in the Department of Environmental Studies, where he founded a master's program in conservation biology. He is the author of five books and is an active environmentalist.

The biosphere is entropic, and diffusion of carbon into the atmosphere is just one sign of that. Entropic systems always move from a state of complexity and concentration of energy and materials, to a state of simplicity and diffusion of energy and materials. Another way we can see this is in losses of biodiversity, such as decline of species or replacement of complex forest ecosystems with simplified ones.

Logging does result in entropy to forest ecosystems by decreasing biodiversity and diffusing nutrients out of the soil. Studies at Hubbard Brook have shown that following a clear cut, there is a major loss of nutrients from the soil that takes about two decades to start to reverse. Also the vast majority of the biodiversity in a forest is below ground and is dramatically reduced by clear cutting, thus resulting in the loss of nutrients. Increasing wildlife diversity is often used to justify clear cuts, whatever increase in wildlife species results, is nothing compared to the overall losses of species, particularly from the soil. I am not opposed to logging, but it should be focused on single tree or group cuts that are conservative enough to not exceed annual growth of biomass to allow our forest to age, increase carbon storage and biodiversity. Studies from the Harvard Forest as well as Bob Leverette are showing that as trees age, they increase carbon sequestration up to 200 years of age. These studies are showing our biggest mitigating factor for climate change is the let out temperate and boreal forest grow older.

In terms of ecosystem health, I'd say a healthy ecosystem increases or maintains its biodiversity and storage of energy and materials. Hope that helps. Tom

(3). The Contention here is we are now due to Human Impacts and their cumulative effects. Carbon Positive, not in a state of "ecological health" as described here by Doctor Moomaw.

The work is currently @carbon positive," meaning that humans emit more carbon dioxide than Nature (land and oceans) remove during a single year. Carbon neutral is the moment when humans are releasing no more carbon dioxide to the atmosphere than Nature and Nature removing and storing. Carbon neutral is not a goal to be achieved, but a moment in time around 2050 that is followed by net negative when humans are emitting less carbon dioxide than Nature is removing.

Forests are important because they are removing nearly 30% of our emissions annually - the most of any ecosystem. They also store vast quantities of carbon in the wood of trees and in forest soils.

It has been found that managing forests differently to let more trees reach a large size could store twice as much as they now do.

Current practice of sustainable forestry - if it were practiced everywhere would keep the amount of carbon in forests forever at the current level. We need to be increasing the carbon stored in forests by proforestation management- letting more trees grow without harvest.

I hope this is helpful.

Regards,

Bill Moomaw

Sent from my iPhone

William Moomaw

Emeritus Professor of International Environmental Policy
Tufts University

Doctor Moomaw June 2022:

***One thing that needs to be said; NJFTF boasted about having Doctor Moomaw, and alleging as Eileen Murphy stated 2/22/23; that the *TF was using Moomaw's definition of ecological health*, (baloney). Doctor Moomaw did ask directly, Why would you want to take trees, from Public Forests?!, that enough trees are already being lost to private lands and developments..They were silent on this! This needs to be emphasized!**

Moomaw Quote from June NJFTF Webinar: ***"Why would you want to log Public Forest?"*** NJFTF. **You will not find this specific statement by Moomaw's in the Report; why?**

Doctor Moomaw was basically pooh poohed by the logging interest.

2/22/23 Trenton

Some Disappointment in the NJ Environmental Committees questions to the opposition to the sanctioned intrusions into our State's Forest remaining. Building a New Paradigm of Ecology, which our way of life lacks.

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In all respects toward this effort to better manage our Remaining Public Forest, i must say that my exposure to the NJ Environmental Committee on 2/22/23 left me with a feeling of a lack of Ecological Knowledge; or a Paradigm Structure background necessary to see the forest for the trees and other life form within it's complex systems of life. A scientific glossary of terms required for this knowledge of ending life in a vacuum, outside the laws of nature and developing a proper paradigm is included in this paper; without understanding of how nature actually works and how our economy or ways of life truly degrade it's remaining spheres is a must for any State Level Committee.

Words or terminology like "Dynamic Equilibrium", Anti-Entropic, Entropy, Bifurcation, and Butterfly effect, are most important in understanding any sense of the term Ecological Health in managing our remaining forest. How is it on 2/22 a member of the Committee was concerned about intrusions of the power government into privately owned forest lands, but no concern was voiced for the intrusions of private interest into the publicly entrusted state forest remaining and their priority given in a cost effective method of climate mitigation?

With Hopes of a better Future.

In full support of the contentions put forth by Elliot Ruga, Policy & Communications Director NJ Highlands Coalition
2/22/23

Nicholas Homyak
NJFTF Participant

Email: makunik52@yahoo.com
2nd paper submitted since 2/21/23

Sparta Mountain violated this legislation

**The Department anticipates that the Regional Master Plan will address the components necessary to protect the natural, scenic, and other Highlands resources, including but not limited to, forests, wetlands, stream corridors, steep slopes, and critical habitat for fauna and flora N.J.S.A. 13:20-11*

Glossary of Scientific Terms

Anti-entropic: Also known as negentropic. Any open system that takes in more energy than it releases and stores that energy in growth and increasing complexity.

Beltian bodies: Small globules on the leaf tips of the Bull's-horn acacia that are harvested by acacia ants for protein.

Bifurcation: A rapid, large-scale change in a complex system's behavior due to iterative, positive feedback within the system.

Biodiversity: Biological diversity at any scale, but if the scale is not defined it is inferred to be at the species level, which is the number of species within an ecosystem. In this regard biodiversity is the same thing as species richness.

Biomass: The total amount of both living and nonliving organic matter in an organism or ecosystem.

Biosphere: The largest scale of biological organization, which includes all of the ecosystems that cloak the planet.

Butterfly effect: The idea that a small-scale change in a complex system through feedback can eventually result in large-scale consequences.

Carrying capacity: The maximal population size that an ecosystem can support without being degraded.

Cellular respiration: The breaking down of carbohydrate molecules within a cell to access the stored energy within the molecules.

Chaos theory: The original name given to the study of nonlinear systems. It is now called complex systems science.

Closed system: A system into which energy and materials cannot enter.

Coevolution: The process by which species adapt to each other so that they can more successfully coexist.

Competitive exclusion: The process by which a very competitive species excludes other species from an ecosystem.

Complex system: A nonlinear system that feeds back on itself as the parts interact in different ways at different times.

Complex systems science: The study of nonlinear systems. It used to be called chaos theory.

Convergence: The process in which minor perturbations within a system tend to cancel each other out.

Dynamic equilibrium: The state in an open system where the amount of energy entering the system equals the amount leaving the system.

Ecosystem: An open system that includes populations of species, nonliving biomass, and the physical environment all interacting together.

Emergent properties: Aspects of a complex system's behavior that result from interactions within the system that couldn't have been predicted by an examination of the system's parts. Due to emergent properties, in a complex system the whole is greater than the sum of its parts.

Entelechy: Self-completing, Aristotle's view of the natural world. Matter and form are linked in a continuous process of change.

Entropy: A process in which a system becomes disorganized and simplified because it loses more energy from its transformations.

Ephemeral vernal wildflowers: flowering plants that grow early in the spring and die back to ground level when the forest canopy leafs out.

First law of thermodynamics: Law of conservation of energy that states that energy can neither be created nor destroyed.

Fuzzy boundaries: Spatial boundaries that allow for the movement of energy, materials, and information between nested complex systems.

Habitat: The ecosystem or ecosystems in which an organism lives.

Intermediate levels of disturbance: A disturbance to an ecosystem that is moderate and not large-scale.

Isotope: any of two or more forms of an element that have the same chemical properties but differing atom weights based on differing numbers of neutrons.

Keystone predator: A predator that keeps competitive exclusion in check and therefore fosters high levels of species richness within an ecosystem.

Kilocalorie The energy needed to raise 1000 grams of water one degree Celsius.

Kinetic energy: The energy of motion.

Law of conservation of energy: The first law of thermodynamics, which states that energy can neither be created nor destroyed.

Law of entropy: The second law of thermodynamics, which states that when energy is transformed from one state to another, some of the energy is lost from the system where the transformation occurs, resulting in entropy.

Limits to growth: The law that states that all systems have to reach dynamic equilibrium in order to sustain themselves.

Linear system: A system in which all the parts work in a lockstep pattern, like a machine.

Microhabitat: A sub-portion of a habitat where an organism exists.

Mutualism: A mutually beneficial interaction between two individuals from different species that is essential for the survival of one or usually both individuals.

Mycorrhizae: Fungi that get their carbohydrate energy from the roots of plants while allowing the plants to dramatically increase their uptake of nutrients and water.

Natural selection: A process in nature where organisms best adapted to their environment have greater chances for survival.

Negative feedback: Feedback within a complex system that maintains the system's status quo.

Nestedness: Complex systems at different spatial scales that are nested one within another.

Niche: The totality of all an organism's interactions with other organisms and the physical environment; its total ecological role.

Nonlinear system: A complex system that feeds back on itself as the parts interact in different ways at different times.

Old growth forest: A forest that has reached dynamic equilibrium.

Open system: A system in which energy and materials flow in and out.

Photosynthesis: The cellular process by which light energy is used to combine carbon dioxide and water, forming carbohydrate energy storage molecules.

Positive feedback: Directional, iterative feedback that may bring about a bifurcation event.

Proximate knowledge of initial conditions: The idea that absolutely accurate measurements are not necessary for making accurate predictions.

Punctuated equilibria: The theory that the development of new species occurs quickly, not gradually, and is followed by long periods of stasis where little further change occurs.

Reductionism: The scientific approach that complex phenomena can be understood by examining their parts.

Saprophytes: Decay-producing organisms that get their energy from nonliving organic material.

Second law of thermodynamics: The law of entropy, which states that when energy is transformed from one state to another, some of the energy is lost from the system where the transformation occurs, resulting in entropy.

Self-organization: Increasing complexity in a complex system as it takes in more energy than it releases.

Species richness: The number of species in an ecosystem.

Static equilibrium: The final entropic state of a closed system that has dissipated its energy.

Succession: Changes in populations of species in an ecosystem through time, initiated by some form of disturbance.

Uniformitarianism: Hutton's theory that all geological features could be explained by slow, accumulative change.

Forest Management Activities on Sparta Mountain WMA
NJ Forest Task Force
Senator Smith Special Committee

The Sparta Mountain Intrusion

Logging is an Obsolete Reaction to NJ Public forest remaining. Your 10 acres stands scenario, of continued **logging/cutting or implied one species habitat creation**, will only bring over-all degradation through disturbance to our Public Forest remaining.

10 acres within Stands 7 and 8 next fall/winter (November 2023 – March 2024). This prescription will likely retain around 20 sq. ft. of basal area per acre across the 10-acre site to allow for the growth of young oak and hickory trees, blackberries, sedges, and a variety of other native shrub and sapling plants. This will also create breeding and/or foraging habitat for the 80 different bird species that have been observed using other managed sites on Sparta Mountain WMA, as well as help regenerate oak forests.

Please consider the following comments; of grievance and disappointment in this ongoing violation of the Public Trust and Disturbance in the heart of the NJ Highlands Protection Area.

NJ Highlands Water Protection and Planning Act:

The Department anticipates that the Regional Master Plan will address the components **necessary to**

protect the natural, scenic, and other Highlands resources, including but not limited to, forests, wetlands, stream corridors, steep slopes, and critical habitat for fauna and flora N.J.S.A. 13:20-11

(In NJSA. 13:20-11 they have allowed forestry for the forests).

*Think of any environmental problem and you will see it is a process where complex systems are being simplified or concentrated materials are being diffused...Tom Wessels
Myth of Progress

One Species Management for a complex system forest?

Sparta Mountain creating habitats for one species or one biota as if a forest were a "linear" rather than a complex system, is creating emergent properties that will surely injure the forest resource by disturbance. Yellow/Golden-Winged-Warbler has decreased due to overall habitat loss, causing a mismatch in "phenological elements no longer in place for the species", they have moved north. Is there already not enough broken habitats of forests and woodlands in NJ to accommodate these bird species? The Sparta Mountain scenario cannot be based on any science of terrestrial earth. It is a fantasy; a 'build and they will come developers speculation scam..

Once and Future Forest: Jones Sauer: page 90

Biodiversity per se is not the underpinning of ecological stability. Ecosystem integrity and function set the necessary conditions for biodiversity to flourish by achieving stability. Biodiversity then is a function of the relationship between ecosystem structure and dynamics and processes. But it is a stability precariously balanced-

constantly ebbing and flowing with each wave of ecosystem change. The Critical Natural Keystone species in maintaining this delicate and ever-shifting balance is Homo sapiens.

Disturbance

Two scientific aspects of any forest or biosphere to be considered is disturbance, and increased contamination from invasive species, and damage to remaining indigenous biome, through use of heavy machinery, and undisciplined workforce. The evidence stands that Sparta Mountain "habitat creation" and wishful thinking for a new sprouting healthy forest of oak, was a ploy to allow logging interest, which has benefited NJDEP and the public not. \$11,000 dollars in chump change over 11-years and where did that go for? The transparency of the profits taken by private interest for the former maturing trees of NJ Highlands is still opaque.

New Science ignored by NJDEP . Proforestation is the need of the time. Governor Murphy's Failure to protect our Public Forest is unforgivable in the rhetoric of his climate goals.

The world is currently @carbon positive," meaning that humans emit more carbon dioxide than Nature (land and oceans) remove during a single year.

Carbon neutral is the moment when humans are releasing no more carbon dioxide to the atmosphere than Nature and Nature removing and storing.

Carbon neutral is not a goal to be achieved, but a moment in time around 2050 that is followed by net negative when humans are emitting less carbon dioxide than Nature is removing.

Forests are important because they are removing nearly 30% of our emissions annually - the most of any ecosystem. They also store vast quantities of carbon in the wood of trees and in forest soils.

It has been found that managing forests differently to let more trees reach a large size could store twice as much as they now do.

Current practice of sustainable forestry - if it were practiced everywhere would keep the amount of carbon in forests forever at the current level. We need to be increasing the carbon stored in forests by **proforestation management**- letting more trees grow without harvest.

Doctor William Moomaw

In short any and all deforestation activities should cease immediately. The disturbance will not bring the forest you anticipate. Forestry is not the science of ecological forest systems it is economics and inappropriate for NJ Public Forest remaining, and this Task force under the background of climate change.

With Climate Change and the massive loss of planetary biodiversity and forest world wide older mature forest and trees themselves have never been more significant and needed.

extraction and development). Intact forests are largely tropical forests or boreal forests in Canada and Russia (Watson et al., 2018). In the U.S.—a global pioneer in national parks and wildlife preserves—the percentage of intact forest in the contiguous **48 states is only**

Today, <20% of the world's forests remain intact (i.e., largely free from logging and other forms of an estimated 6–7% of total forest area (Oswalt et al., 2014), with a higher proportion in the West and a lower proportion in the East.”

Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good

WR Moomaw, SA Masino, EK Faison - (see IntactForestPDF

As you can see from the above, we have precious little land that has not been highly modified. So as a wise man once said “when in a hole stop digging”

These management programs began under the Christie Administration, he was an avid enemy of the NJ Highlands Act, and a Climate Change denier. It is my opinion these forest plans were purpose insults in complete disregard to the known science, and a obvious violation of the Public Trust, a theft of the common, by private interest. NJ Public Forest must play their role in the Climate Change Emergency, they are Our Amazon.

Sincerely,
Nicholas Homyak
NJFTF Participant

Doctor Moomaw's words to the NJFTF June 2022. “Why would you want to take trees from the Public Forest”? This statement to the task force will not be found in the 274-page report.

Senate Environment and Energy Committee
Senator Bob Smith's Special Task Force
Climate Change, Public Forest Remaining
Proforestation is the answer to our Remaining Public Forest

Nowhere in the 274 Page Task Force Stewardship Report , is the direct question Doctor Moomaw posed to the Task Force; “ why would you want to takes trees from the public forest?

Doctor William Moomaw: Proforestation: Threat to NJ Forestry Association and NJ Audubon.

It can not be emphasized enough what Doctor William Moomaw's presence meant to the NJ Forestry Association, and NJ Audubon. NJFA/NJA, found Doctor Moomaw's "Proforestation" and it's scientific validation a threat to their private interest; incursions into NJ Public Forest Remaining.

Evidence of bad faith NJ Forestry Association Webinar April 2022

Attending a webinar of the NJ Forestry Association in April of 2022 i witness there displeasure of this new paradigm being introduced as a management approach to our "public forest" somehow now seen, as their domain of a political done deal allowed for logging, cutting and Silviculture, Climate change be damed. As to the NJFA, the science isn't in yet, and we can't put ourselves all in the same basket, and proforestation would disband them for operating in public forest. NJFA was making light of Moomaw, Climate Change, and especially *proforestation*; "*can't log any-trees with this*"; almost verbatim.

Who needs Science?!

NJFA also implied and openly spoke of political not a scientific solution to their dilemma of possible cease and desists in NJ Public Forest Reaming in NJ. This was surely evidence of bad faith in reaching a consensus, and if that could not be obtained a compromise to their interest, through minority rule, or in effect a veto power. The NJ Senate Environment and Energy Committee by, just cause, and correct legal inquiry should summons this webinar (Complete and Unredacted) of April 2022 of the NJFA, take on proforestation, as it it proof of the above mentioned undermine and attempted minority rule from the same elements that caused these disturbances in our Public Forest.

NJ Audubon undermine of Proforestaion with Convolutd logic in article here included;

AudubonArticle:

**What Does “Old-Growth” Really Mean? It depends. – Bringing it all together (installment 6 of 6)
DECEMBER 20, 2021 JOHN PARKE NJ AUDUBON, STEWARDSHIP**

As we have discussed in prior posts, of New Jersey’s possible old growth sites identified in Old Growth in the East (1993, rev 2003), none of these areas are pristine. All of these sites have been influenced by modern human activity and all continue to be threatened by a hands-off approach to management. These areas are experiencing ‘Proforestation’ (Moomaw et al., 2019), a concept that promotes “growing existing forests intact to their ecological potential” **without further intentional management. However, as discussed previously, these forests have experienced past disturbance and are currently**

subject to stress from climate change, invasive species, and intense deer herbivory. *What if focusing on carbon storage blinds us to factors that could increase the vulnerability of these forests to stressors over the next 20 or 50 years?* What if those stressors drive large-scale, synchronous overstory mortality and a net loss in the carbon and biodiversity pool? Some articulations of the proforestation concept, seem to discount the dynamics experienced by forests through time and space as well as the importance of variability in stand structure to yield long-run stability over expansive forests.

The what if we don't, should be : in case we don't, apply having Public Forest to increase carbon mitigation and biospheric entropy, to address the climate emergency. That science is clear, and we are all in the same basket; or do we have climate change deniers here?

NJ Audubon lacks a required educated ecological paradigm of how nature works and how it has been impacted already by Human Progress. Their forest management concept increases disturbance in sphere's of recovering maturing forest, they wish to spread the disease of invasive species, and deer. NJ-Audubon statement; without further intentional management. However, as discussed previously, these forests have experienced past disturbance and are currently subject to stress from climate change, invasive species, and intense deer herbivory; is ludicrous!

*Almost all of NJ has been deforested 3 X before the Civil War. We have recurring, succession maturing forest. Here Audubon is siding with logger, in their ploy to create habitat while further disturbing maturing public forest (NJ has no real old growth forest); their ecological illogic downgrades proforestation and especially it's role in climate change mitigation. **Hypothetical, "what if's", made-up ecologically unsound ridiculous contentions. Audubon dismissed and discounted disturbances they inflict, on a much greater scale, again in favor of the loggers through use of machinery, and time quirks with lacks supervision and conscience disciplines involving ingress and egress, and on sight work areas...**

The NJ Audubon and the NJForestry Association have proven they are incapable of learning or applying the required science and numerous evidence that demonstrates their approach is totally inappropriate to deserve any considerations under their pretext to continue management of our "public forest remaining".

Why is it that in the 274 page NJ Forestry Stewardship report, Doctor Moomaw's direct question to the NJFTF is not included; "Why would you want to take trees from Public Forest", here in New Jersey?

Not what if; but what is! More Moomaw

Why would NJ want to help accelerate the climate emergency, through improper, unsound ecological methods of disturbance?

Forest manage themselves through the phenomena of "self-organization", and succession. There is no waste in a forest. NJ Audubon and NJ Forestry Association seem to deny these truths; therefore their methods do not belong in our public forest management policies and mandates. Their's is a business model, not an ecological one required to address climate change and loss of biodiversity.

Once and Future Forest: Jones Sauer: page 90

Biodiversity per se is not the underpinning of ecological stability. Ecosystem integrity and function set the necessary conditions for biodiversity to flourish by achieving stability. Biodiversity then is a function of the relationship between ecosystem structure and dynamics and processes. But it is a stability precariously balanced- constantly ebbing and flowing with each wave of ecosystem change. The Critical Natural Keystone species in maintaining this delicate and ever-shifting balance is Homo sapiens.

Disturbance

Two scientific aspects of any forest or biosphere to be considered is disturbance, and increased contamination from invasives, and damage to remaining indigenous biome.

The Situation we Face Today Global Biosphere Entropy, aka Ecological Health

"Today, 20% of the world's forests remain intact (i.e., largely free from logging and other forms of extraction and development). Intact forests are largely tropical forests or boreal forests in Canada and Russia (Watson et al., 2018). In the U.S.—a global pioneer in national parks and wildlife preserves—the percentage of intact forest in the contiguous 48 states is only an estimated 6–7% of total forest area (Oswalt et al., 2014), with a higher proportion in the West and a lower proportion in the East."

Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good, and preserves scenic beauty.

Good WR Moomaw, SA Masino, EK Faison - (see IntactForestPDF

As you can see from the above, we have precious little land that has not been highly modified. *So as a wise man once said "when in a hole stop digging."*

"Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty. Additionally on the need to keep forests intact

If we are to meet our climate goal. The advantage of the above approach is it requires little in the way of new funds and may in fact generate income if the state decides to use some of the carbon that will be captured for sale on the emerging carbon markets which currently lack verifiable projects that can be trusted. Additionally if the State decides to measure the carbon captured, it may provide a new source of employment for State Foresters.

A Teapot Dome Type Breach of Public Trust

The intrusions into our public forest remaining, by private interest is a form of a Teapot Dome Scandal, which should never have occurred under NJDEP. It is an undermine of government as intended in it's guardianship of the public trust. This was violated when State Green Acres acquired forest, in the NJ Highlands Protection Area were turned over to private loggers under the ecological absurdity of habitat creation and it's associated logging in our Remaining NJ Public Forest.

Sincerely,

*Nicholas Homyak
NJFTF Participant
Volunteer in Parks 48+ years*

Public Forest/ Private property Loss equations

Are Not Enough Trees already taken from private property, and developments? In my Town of Parsippany many trees were removed on Green Acres, without permits or forest plan, and for unsound reasons. Concerns were place to NJDEP, with no or minimum consequences for the demise. These trees were healthy oaks, beech and ash. No transparency was forthcoming nor Public input or participation.

354x

As a member of the Madison, NJ Environmental Commission, I oppose a proposal from a state Forest Task Force that is essentially a logging plan for public lands. It calls for removing old trees to create "young forests." This strategy is not good for climate change (old trees store the most carbon and retain the most water). It also opens forests up to plants/invasive species.

I advocate, instead, for **Proforestration and Ecological Restoration, which would consider the primary ecological components of the forest:** water resource production and storage; biodiversity; soil complexity; compatible human recreation; and carbon capture and storage, to be of equal importance. **Traditional forestry, on the other hand, elevates timber production as the primary focus. That's not what we want for our forests.**

Thanks,
Ann

Ann Huber

355x

Dear Senator Smith and the Committee on Environment and Energy,

To begin, I would like to express my sincere appreciation to Senator Smith and the Task Force Chairs for conducting this comprehensive and informative New Jersey Forest Task Force, and for all the work put into its execution and final product.

I am Kate Krehel, youth President of ~~the~~ High School's Climate Action, a member of the NJ Forest Task Force, and Leader of the Ridgeview Woods Trail Stewards, a group of youth that protect and restore forests. I would like to express my views on the ongoing debate regarding management of New Jersey's forests.

As a high school student who has worked to restore forests and remove invasive species alongside other students for three years, I have witnessed many of the benefits forests provide, including carbon sequestration, ecosystem services, and wildlife habitat. Forests provide a necessary home for many of New Jersey's most endangered wildlife, like the barred owl and red-shouldered hawk, while being vitally necessary carbon sinks to combat the crisis of climate change.

Forests, however, offer not only ecological benefits. Many of us return each week to maintain trails -- but also because we simply feel better when we spend time in forests. As the recent Center for Disease Control report points out, youth are undergoing severe anxiety and depression, part of which is connected to the existential threats of climate change and species extinction. Time spent in forests not only provides solace for many adolescents undergoing stress, but improves their mental health and well being. In addition, research indicates that people have a strong preference for undisturbed as opposed to disturbed or degraded forest areas.

To better understand New Jersey's forest management, I have visited Sparta Mountain several times and directly witnessed the impact of logging on mature forests. To better understand this issue, I suggest that Committee members all visit intact and logged forest.. The scene at Sparta Mountain is one of devastation. The soil is compacted and rutted. Stumps of over 100-year old trees poke out of the soil. Silence abounds as birds and wildlife are no longer present. Given the abundance of secondary forest habitat, rights of way, and wastelands throughout New Jersey, targeting mature intact forest – the most

vulnerable and valuable of state forests – makes no sense. These are the areas the state has purportedly protected for the public good.

As written, the current framework permits logging of the very forests we need to save, and the continued degradation of precious soil, water, and wildlife. In addition to emitting carbon, logged sites exacerbate flooding, and boost the incidence of infectious diseases, including Lyme disease and scores of others. Furthermore, once areas are logged, invasive species enter, outcompeting natives and becoming detrimental to both wildlife and native plants.

During the NJ Task Force I learned a great deal from outstanding NJ scientists who spoke with decades of research and field experience regarding what makes most common sense, as well as what is validated scientifically -- forest management through pro-forestation. New Jersey is fortunate to have such a wealth of dedicated professionals and their expertise needs to be heeded by the NJDEP. In a state as densely populated as New Jersey, it is essential to keep as much forest standing as possible, and to prevent the logging of public lands.

Through working in woodlands during the last three years, I have come to understand how crucial forests are to our climate crisis, water resources, biodiversity, and mental and physical health. These trees represent the future of youth. There is international scientific consensus that forests are our best defense against climate change; keeping them standing is essential for ensuring a bright future for me and the following generations.

Thank you,

Kate Krehel

Comments to improve upon the NJFTF Recommendations submitted to the joint committee on Wed Feb 22nd

John Landau

3/15/23

Member Morris Township EC, NJ Woodland Steward, Rutgers Environmental Steward

Overview

The NJ Forest Task Force Conceptual Framework of Recommendations is an outstanding outcome, but before being memorialized in policy and legislation the recommendations need to be made stronger in three areas.

- Strengthening these is very important to establish a solid and sustainable framework that enables constructive dialogue and efficient resolution of honest disagreements.

versus

- Leaving these three areas ambiguous and soft will continue to feed the polarization and distrust that is making it very difficult for the conservation community to come together to move forward.

These are addressed in a unilateral draft proposal in the appendix beginning on page 4 also at ■ Principles, Standards and Practices for the Management of NJ Public Forests v.2

Three areas requiring more rigor:

1. Foundation Principles or Goals For NJ Public Forest Management.

- Robust and agreed Foundation Principles or Goals are a necessary common touchstone to guide and validate standards, practices, and plans.
- A clear agreement on goals ("why" and "what") is required to converge to agreement on management plans ("how")

Is:

- The NJFTF recommendations make no statement about foundation principles to guide the **Statewide Inventory and [high level] Planning recommendations 1-9**, which are the basis for the later [lower level] management planning recommendations.
 - How can we plan without Foundation Principles?
- Recommendation 10 finally does introduce some general principles, but only for **Forest Management Planning and Implementation recommendations 10-16**.

Should be:

- Robust Foundation Principles must be clearly and fully described and must guide all levels of planning and governance.
 - *Principles are the preamble of a framework, not something buried in the middle*
- Foundation Principles should align to a common global standard in order to
 - ensure that they will persist into the future

- reduce the frictions of collaboration across vertical entities from federal to municipal and horizontal entities within regions and other domains
- be supported by global research and best practices development.

Recommendation:

- A derivative of the NJFTF should be chartered to develop a consensus recommendation for NJ Public Forest principles and standards.
 - A unilateral conceptual draft proposal is offered in the appendix
 - NJ should evaluate subscribing to the Society of Ecological Restoration INTERNATIONAL PRINCIPLES AND STANDARDS FOR THE PRACTICE OF ECOLOGICAL RESTORATION (which shape and are described in the draft proposal).

2. Sustainable, strong, technically competent and trusted central leadership

- This is a necessary capability to assure efficient development and acceptance of science and stake-holder based policy, planning, and practices.

Is:

- The NJFTF Recommendations reference a Science Advisory Panel in footnotes to Recommendations 1, 6, and 14 and also an Oversight Council in Recommendation 6.
 - One sad model offered is the NJ Forest Advisory Stewardship Committee [defined in Subchapter 6 of CHAPTER 3: FORESTRY (N.J.A.C. 7:3) last amended in 2017], which seems to be completely moribund.

Should be:

- It must be a top priority to develop a thoroughly considered and well-staffed ongoing structure to develop science-based recommendations regarding policy, planning and practices as well as provide high level monitoring, evaluation and oversight for the framework.
 - It must be real and effective, not mythical and token
 - Far more than a footnote.

Recommendation

- Form an NJFTF technical working group comprised of ecology and land management professionals representing the breadth of opinion (eg the 4 co-chair organizations, the NJ Highlands Coalition, NJSST, and Rutgers)
- Charter the working group to survey technical advisory committee and council precedents in NJ and elsewhere and then to propose a robust design for a sustainable, effective, and efficient NJ Public Lands technical advisory committee or council
- The committee or council should be adopted as a key "standard of practice" similar to the requirement in the unilateral draft proposal in the appendix.

3. Standards of Governance for NJ Public Forest Management

- NJ Public Forest properties must be managed within the management and planning context of their adjacent properties and their larger landscape region (eg Atlantic Coastal, Delaware Bay, Piedmont Plains, Pineland and Skylands per the NJDEP Landscape Project version 3.3)

Is:

- The NJFTF recommendation 1 recommends state-wide planning and mapping for forested public land “based upon a comprehensive planning and mapping process at the landscape level...” but provides no further guidance. This allows an interpretation that public forest planning can be done largely in isolation from the planning for their surrounding properties in the landscape.
- NJFTF recommendations 2 and 3 recognize a gap in the formal rulemaking process for the development of forest management plans on public forests and recommend that correcting this “will be informed by and consistent with statewide planning and inventory efforts...” but this is easily interpreted to mean only the statewide planning for forested public land (ie only recommendation 1) and not statewide land use planning to manage regional landscapes regardless of the property holder.

Should be:

NJ Public Forest Planning and Management Plans should at minimum explicitly conform with all state land use planning and regulations applicable to private lands.

For example, public forest land use must at a minimum conform to

1. Statewide Wetlands, watershed, waterway , wildlife, soil and other protections
2. Highlands Region RMP and associated requirements
3. Pinelands Conservation Management Plan and associated requirements
4. County Master Plans

Recommendation:

- Legislative consultation with the Highlands Council, Pinelands Commission, and other NJ Land Use Management authorities to define how NJ Public Lands must be managed coherently with all NJ lands.
- A unilateral viewpoint is described in the draft proposal in the appendix.

Appendix:

Principles, Standards, and Practices for the Management of NJ Public Forests v.2

(also  Principles, Standards and Practices for the Management of NJ Public Forests v.2)

This is a draft proposal offered as an example of building from Foundation Principles and adopting global Standards. The proposal encompasses the three requirements above.

Principles, Standards, and Practices for the Management of NJ Public Forests

Working Draft Version 2

John Landau John4383@gmail.com

Member Morris Township EC, NJ Woodland Steward, Rutgers Environmental Steward

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Overview

The three sections of this position paper propose a structure of science-based Principles, Standards, and Practices to be used to guide policy and legislation for the management of New Jersey State, County, and Municipal Public Forests.

- **The Principles are the foundation that the standards and practices build upon.**
- **The Standards are the management model for governance, planning, and implementation.**
- **The Practices are high-level descriptions of example components that may be applied in Forest Action Plans** (also known as forest stewardship plans and ecological restoration plans)

This framework approach is modeled after and in parts recommends the Society for Ecological Restoration International Principles and Standards for the Practice of Ecological Restoration (ref 1), a massively peer-reviewed international standard for natural lands management.

The common lexicon of this standards-based hierarchical framework enables

- Dialogue and adoption layer-by-layer and component-by-component.
 - Agreement to enable ecological restoration does not need to wait for 100% concurrence.
- Easier cross-jurisdictional alignment between state, regional, county and municipal land managers
- Continuous improvement based on easier information sharing amongst regional, national, and global ecological restoration practitioners.

We recommend that the reader should analyze this document section by section:

1. Are these the right guiding principles for the management of public forests? If not, why?
2. To follow these principles, are these the right standards of practice for governance, planning, and implementation? If not, why?
3. For planning and implementation, are these some of the high-level practices that need consideration? If not, why?

1. Management Principles for NJ Public Forests

The following are the principles that should underpin the governance, planning, and implementation of NJ public forests management.

a) NJ Public Forests should be managed to deliver ecosystem services for the broadest public good

- Climate Defense Ecosystem Services to mitigate and adapt to climate change including:
 - Carbon Storage and Sequestration, for global benefit
 - NJ forests are New Jersey's overwhelming carbon store, with an annual sequestration of about 8% of 2018 Green House

Gas (GHG) emissions that is a critical component of NJ's net-zero GHG goal.

- Stormwater and Drinking Water management, for NJ benefit
 - NJ Forests are natural "green infrastructure" slowing stormwater runoff and filtering water for our drinking supply
- Biodiversity (ref 4), for NJ benefit
 - Biodiversity underpins ALL ecosystem services, with the richest biodiversity providing the highest level of delivered services
 - Richer biodiversity also makes ecosystems more resilient to adapt to climate change, disease, and other modern stresses
- Urban Forest cooling, for local benefit
- Social Health Ecosystem Services including
 - Recreation, for regional, NJ and local benefit
 - Hiking, fishing, hunting, biking, etc
 - Cultural heritage sites, for NJ and local benefit
 - Outdoor education activities, for NJ and local benefit
- Commercial Extraction ecosystem services (eg timber harvests) of any kind are NOT a management goal for NJ Public Forests
 - The public value of the non-extractive ecosystem services overwhelmingly outweighs the public value of any commercial extractions
 - Any value from extractions must be only an artifact of pursuing the the Climate Defense and Social Health Ecosystem Services

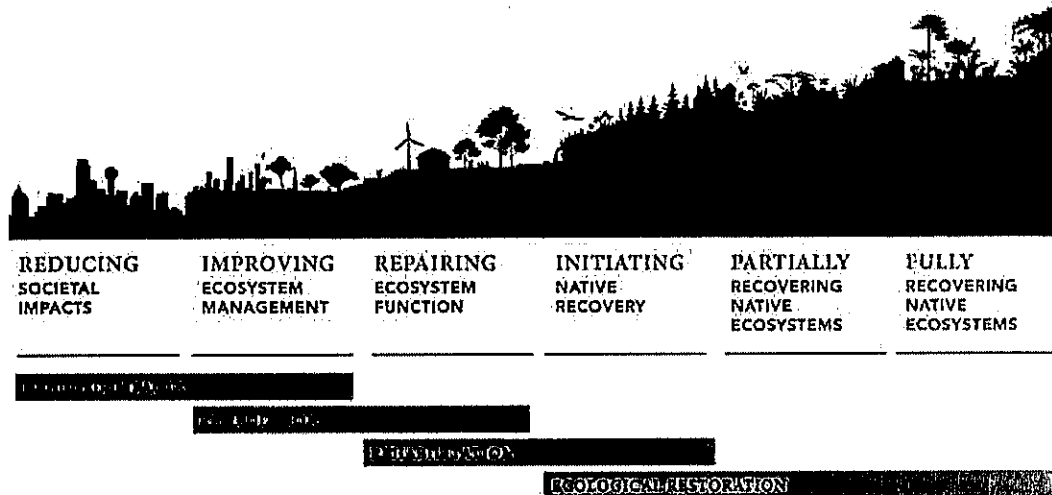
b) The unique urgency of the Climate Defense ecosystem services should be a tie-breaker when opposing management options have similar net costs vs benefits but one option includes more net Climate Defense benefits

Climate Defense actions between now and when the world approaches net-zero GHG emissions and climate change stabilizes are particularly critical.

- Every ton of carbon not stored is a negative climate impact for hundreds of years.
 - Forests are the lowest cost and most effective means for NJ carbon capture and storage (ref 4).
- Extreme precipitation events and associated flood threats are rapidly increasing
 - Forests provide very important stormwater retention services
- Short-term damage to biodiversity may not be reversible

c) The goal for Public Forests is Ecological Restoration
(=recovering functional and resilient native ecosystems)

NJ ecosystems are broadly impaired because of densely populated NJ's history. Cycles of development, industries, and heavy land use have not spared any ecosystems in NJ from damage. NJ ecosystem restoration efforts underway span the entire SER "Restorative Continuum", from reducing impacts to ecological restoration.



SER International Principles and Standards for the Practice of Ecological Restoration. 2nd Edition Figure 5. *The Restorative Continuum includes a range of activities and interventions that can improve environmental conditions and reverse ecosystem degradation and landscape fragmentation. The continuum highlights interconnections among these different activities, and recognizes that the specific characteristics of the locality slated for restorative actions dictates the activities best suited for different landscape units. As one moves from left to right on the continuum, both ecological health and biodiversity outcomes, and quality and quantity of ecosystem services increase. Note that ecological restoration can occur in urban, suburban, agricultural, and industrial landscapes.*

Reference (1)

The Ecosystem Restoration goal for Public Forests in NJ should explicitly and only be at the top section of the Continuum, Ecological Restoration.

The fullest level of sustainable ecological function in different NJ forests is determined by characteristics such as

- History of disturbance of the soil structure and biome
 - The least disturbed public forest areas have only been logged and therefore may retain undisturbed soils that can host specialized native plant species.
 - Public forest areas that are reforested post-agriculture lands possess disturbed soils that result in being welcoming to invasives and unable to support specialized native plant species.
- History of disturbance by invasive species
 - American Chestnut Blight, Emerald Ash Borer, Hemlock Woolly Adelgid, and more have permanently change forest community composition
- Fragmentation/ poor connectivity

- "The majority of forestland New Jersey is made up of patches of forest smaller than 1,000 acres, and only 47% of forests have interior forest conditions" (ref 2)
 - Fragmentation results in
 - Reproductive failure for native species that require large contiguous habitat
 - Increased "forest edge" that fosters the spread of invasives species and the overpopulation of deer
 - Isolated populations losing genetic diversity and it's resilience and also unable to migrate as needed to adapt to stresses like climate change.
 - [connecting-habitat-across-new-jersey-chanj/](#)
 - Climate change
 - Native plant and animal community composition will adjust with fading populations of cold-dependent species and growing dominance of warm-dependent species (those which are available).
 - Shorter, warmer winters will also foster expanded populations of invasive plants, animals, and diseases.
 - Potentially reversible pressures
 - Deer overpopulation
- There is no return to pre-colonial ecosystems.

2. Standards of Practice for Governance, Planning and Implementation of Public Forest Management

The following are the standards by which NJ Public Forest management governance, planning, and implementation should be applied:

a) Conformance to NJ Climate Defense goals and objectives

- NJ Forests are important to meeting the NJ 80x50 Act goals
 - Public forests contribute about half of of NJ's carbon sequestration.
 - The [NJDEP Natural and Working Lands Strategy](#) intends to manage forests towards the 80x50 goals
 - [Forest Resource Considerations for A New Jersey Natural and Working Lands Strategy](#) Feb 2021 is a preliminary overview
- NJ Forests are also important contributors to NJ Climate Adaptation
 - NJ Forests are major "natural infrastructure" intercepting precipitation to significantly moderate downstream flood risk and also filtering and infiltrating drinking water. Urban forests also provide local cooling services.
 - With climate change, this natural infrastructure needs to be managed to goals consistent with those driving the proposed NJ ADAPT regulations for developed areas.

b) Compliance to Regional Master Plan goals and objectives

- Highlands Regional Master Plan
- Pinelands Comprehensive Management Plan

c) Public Forest Master Plans that incorporate ecosystem services assessment and goals

- A statewide master plan should be built upon The NJ Landscape Project
- Local Master plans should be created and then updated at least each 10 years for each NJ public forest > 500 acres, clusters of smaller state public forests within one ecoregion, clusters of smaller county public forests within one county, or clusters of smaller public forests within one municipality
- The master plans should be consistent with state and regional plan goals and objectives
- There should be explicit goals and objectives to maximize delivery of ecosystem services via ecological restoration
- Each master plan should include
 - Environmental Resource Inventory
 - built with best practice GIS databases
 - and ground-truthed surveys as warranted
 - Ecosystem services assessment and qualitative/quantitative valuation
 - Historical, current, and target land usage
 - Area-by-area target native reference ecosystems
 - Per SER Principles, Standards and Practice Principle 3 (ref 1)
 - Forest Action candidate project abstracts including rough estimates of level of effort and costs vs benefits, sorted into three categories
 - Necessary to maintain ecosystem services ("Must Have")
 - Important for services ("Should Have")
 - Valuable return from improved services ("Could Have")

d) Public Forest Action Plan that each comply with the Public Forest Master Plan and State Land Governance Rules

- Each action plan for any given area shall comply to the Public Forest Master Plan applicable to that area, including its goals and objectives.
- Each action plan shall also be governed per the applicable land governance rules.
 - eg wetlands and stream protection regulations
- The Highlands Commission and the Pinelands Commission plans, rules and regulations shall prevail within their respective regions

e) The SER INTERNATIONAL PRINCIPLES AND STANDARDS FOR THE PRACTICE OF ECOLOGICAL RESTORATION shall be adopted by NJ as the high level guideline for public lands ecological restoration

(this link is a 7 page summary. See ref 1 for full document)

- Key stakeholders and contributors to the second edition over a multiyear period included
 - The UN Convention on Biological Diversity
 - The UN Convention to Combat Desertification and its science-policy interface Global Environment Facility
 - The World Bank

- Members of the UN Global Partnership on Forest Landscape Restoration
 - The IUCN Commission on Ecosystem Management
 - Numerous SER members, affiliates, and stakeholders
 - Feedback providers via the SER website
 - Critiques published in the SER journal, Restoration Ecology
- The SER Principles and Standards are foundational guidelines underpinning the policy development and educational investments that are part of the UN Decade on Ecosystem Restoration 2021-2030 and the associated Partner organizations.
- 11 universities (6 US and 4 Canada) have SER-certified restoration ecology academic programs and a lot more have requested that SER list their programs
 - Academic Program Directory
- The National Park Service and Bureau of Land Management have undergone SER training

f) Each Action Plan process to intervene in Public Forests shall incorporate a transparent and public-engaged end-to-end process that generally conforms to the SER International Principles and Standards, Section 3- Standards of Practice for Planning and Implementing Ecological Restoration Projects

(reference 1)

- Planning and Design
 - Stakeholder engagement
 - Context assessment
 - Site tenure
 - Baseline inventory
 - Native Reference Ecosystems and Reference models
 - Vision, targets, goal and objectives
 - For NJ forest action plans, always including 360 degree ecosystem services impacts
 - Restoration treatment prescriptions
 - Analyzing logistics
 - Establishing process for project review
- Implementation
 - Protect the site from damage
 - Engage appropriate participants
 - Incorporate natural processes
 - Respond to changes occurring on site
 - Adapt informed by the results of monitoring
 - Ensure compliance
 - Communicate with stakeholders
- Monitoring, documentation, evaluation, and reporting
 - Monitoring design
 - Keeping records
 - Evaluating outcomes
 - Adapt informed by the results of evaluation
- Post-implementation maintenance

- Ongoing management

Adaptation through the life of the Forest Action project shall also be informed by new knowledge and changed external goals that are independent of the Forest Action project.

g) Science and Practice Policy Committee

- Applied Ecology for ecosystem restoration is complex and continuously evolving.
- A standing committee composed of academics and professionals representing government and private organizations should propose Forest Action plan best practice guidelines within 1 year after formation. The committee shall regularly evaluate the total sum of applicable restoration research and practice as well as evaluations of NJ Forest Action projects and shall annually propose improved NJ best practices and policies as warranted.
- This same committee may also take on related tasks such as deer management policy guidance and best practices.

h) Public/Private Collaboration to deal with Budget Realities

Pursuit of these principles, standards, and practices requires both labor and funds beyond what the state currently has available. We must do what we safely can do, and not let perfect become the enemy of good.

Innovative public/ private partnering with private organizations citizen contributors will be necessary.

New Jersey has done an outstanding job marshalling public support for funding to acquire Public Lands for preservation, but now we need to similarly marshal support for funding and contributed work for public lands management.

At the state level, lands under management have grown 13% since 2008 while staffing has fallen 28% since 2006. New Jersey's operations expenses per capita are 1/3 of Pennsylvania, 1/6 of New York, and 2/3 of the National Average.

<https://www.fixourparksnj.org/the-report>

The NJ public generally understands the value we receive from capital intensive grey infrastructure such as electrical, water, sewage, transport and other systems. We generally have a comparatively poor understanding of the value of the ecosystem services delivered from the green infrastructure, the services that justify public lands acquisition and management.

Outreach Requirements include:

- Clearly define and communicate the rich set of public forest ecosystem services
 - Educate so that citizens recognize the ecosystem services important to
 - them as individuals
 - Their family
 - Their community
 - Society at large
- Adopt best practices to measure and communicate the economic value of ecosystem services, both qualitatively and quantitatively.

- Document the value of public lands at the level of each Public Forest Master Plan
 - Document the value of each Public Forest Action Plan through cost/benefit analysis
- Establish strong partnerships with a growing list of private organizations for education, planning, and/or implementation

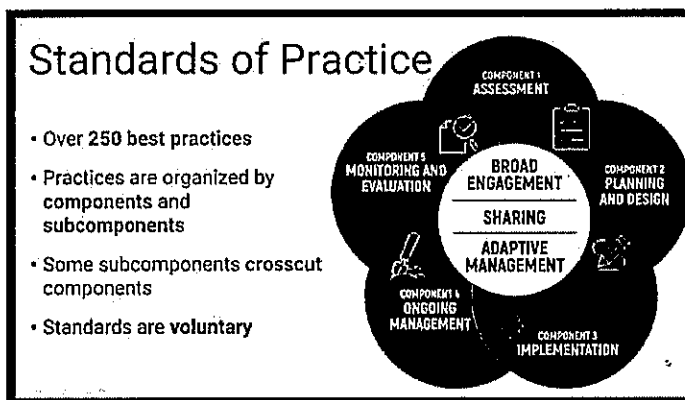
Existing examples include

 - New Jersey Invasive Species Strike Team (NJISST) hosted by The Friends of Hopewell Valley Open Space
 - NY/NJ Trail Conference
 - NJ Audubon
- Facilitate Park Foundations and "Friends of a Park" organizations
- Leverage citizen volunteers for diverse contributions
 - Master Plan process labor
 - Stewardship labor
 - Education and outreach
- Develop structures and processes to reduce barriers to acquire grant funding
 - grants clearing house
 - Grant best practices training
 - etc
- Innovative funding sources
 - Eg NJ Forest Task Force Funding proposals

3. Practices to be considered within Public Forest Action Plans

NJ Public Forest Action Plan Practices apply within plans for specific sites, parcels, or stands. *This section is only meant to be suggestive, not at all comprehensive.*

a) Conform as applicable to the SER Standards of Practice For Ecosystem Restoration (2023)



This SER Standards of Practice is a global collaborative contribution to the UN Decade on Ecosystem Restoration that involved the review of 127 different practice standards and then consolidation of the best elements across 46 of them. Over 400 restoration experts provided over 2000 comments.

This provides a common lexicon for communicating, studying, and improving ecological restoration best practices.

b) Proforestation

In the February 2022 paper Forest Resource Considerations for A New Jersey Natural and Working Lands Strategy, Dr Rick Lathrop and five other Rutgers Faculty stated the following to offer Proforestation as an option to manage forests for maximum carbon sequestration:

"Proforestation is a strategy to allow forests to reach their ecological potential by keeping them intact, thereby enhancing carbon sequestration through preserving and/or increasing biodiversity and ecological function (NJDEP, 2020b; Moomaw et al., 2019; Bashir et al., 2019)."

" Adopt a specific and actionable definition of 'proforestation' applicable to New Jersey as well as decision criteria, evaluation methods to assess efficacy, and adaptive management approaches to intervene if monitoring demonstrates that 'proforestation' areas are not developing along a desired trajectory. With those clarified definitions, the State can then identify mature, intact forests storing large amounts of carbon where additional carbon gains and ecological benefits can be achieved. "

Proforestation practice is compatible with most other forest management practices, many of which will be periodically required as a component within Proforestation-based Forest Action Plans. These include:

- Invasive species management
- Deer and other wildlife management
- Prescribed burns
- Species additions
- Hazards management to remove risk to people and infrastructure
- Passive recreation and cultural services provisioning
- Guided mature forest ecological restoration, for example
 - Facilitating successful climate adaptation towards a warmer-climate target and reference ecosystem
 - Protecting or helping the recovery of at-risk species and target ecosystems
 - Facilitating the diversity of ecological niches across a landscape

Proforestation practice strives to facilitate forest resiliency to safely accommodate natural disruptions such as

- Extreme weather events
- Natural spread of invasive species
- A mild level of natural forest re-engineering, such as by beavers

Proforestation practice is not compatible with

- "Major Surgery" treatment plans
- Logging and most other forest products extraction
- Soil-compacting heavy equipment
- Unnatural ecosystem creation, eg monoculture plantations or alien species collections

c) Reforestation and Afforestation

- Reforestation is the passive or active restoration of historical forest land to restore ecological function towards the target reference ecosystem for the site
 - The Pinelands Atlantic white cedar restoration project is one major example
- Afforestation of croplands that long ago were forested is similarly beneficial.

d) Special Protection Areas for unique assets

Some local sites have unique qualities that warrant special protections.

Such sites might include:

- Natural Areas that already do or can sustain rich biodiversity including threatened species
 - The Natural Areas program addresses this, but has become somewhat moribund
- Heritage Sites
 - Historical, indigenous and natural heritage

- Passive Recreation Sites
- Sensitive Watershed Areas potentially including
 - Karst topography, protected stream area, and reservoir and aquifer sources

d) Invasives Species Management

- The NJFTF Invasive Species Work Group is addressing this.
- The Invasive Species Council proposed in S2186 is a critical component

f) Deer Management

- Overabundant deer are a primary threat to New Jersey's public and private forests.
 - Forest regeneration in many forests is suspended because native saplings, shrubs, and ground plants cannot grow due to deer herbivory.
 - Invasive, non-native plants take over and block the regrowth of native forest flora because the deer prefer native species, from tree seedlings to trilliums.
 - Research has found that native plant communities will rebound when a deer population is held to sustainable levels. (ref 6)
- NJ should cease all current programs that encourage increases in deer populations.
- NJ must pursue innovative programs to bring the deer population down to sustainable levels.
 - This is a very complicated challenge

g) Prescribed Burns

- Burn regimes are an important practice that warrants broader use and development

h) SER Certified Ecological Restoration Practitioner (CERP)

Authorization for Forest Action Planning and Implementation

- SER CERPs are internationally recognized Applied Ecology Professionals, with requisites including both professional training in restoration ecology and five years of practical experience.
- SER Certified Ecological Restoration Practitioners in Training (CERPITs) have completed the professional training but are still building the required years of experience.

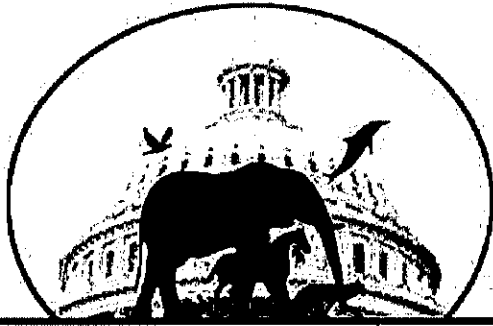
NJ Forest Task Force Acknowledgement

This document attempts to respectfully complement the large body of work by the NJ Forest Task Force. In 2022 the NJ Forest Task Force with well over 100 participants produced numerous proposals and discussions that the four co-chairs interpreted into the NJ Forest Task Force Report Feb 2023 recommendations which the co-chairs described as a "starting point".

This document is not in any way endorsed by the NJ Forest Task Force, but it follows from that starting point.

References and Resources

- International Standards
 - 1) International Principles and Standards for the Practice of Ecological Restoration 2nd Edition
Society for Ecological Restoration (SER)
[International Standards for the Practice of Ecological Restoration](#)
SER is a United Nations Decade for Ecological Restoration Global Partner
- Syntheses of scientific research
 - 2) Restoration and Resilience in NJ Forests
www.forestguild.org/publications/research/2014/New_Jersey.pdf
 - 3) Wild Carbon: A Synthesis of Findings on Carbon Storage in Old Forests
Dr. Mark Anderson, Director of Science, Eastern Region at The Nature Conservancy
International Journal of Wilderness
<https://ijw.org/wild-carbon-storage-in-old-forests/>
 - 4) Biodiversity the language of wilderness
Janet McMahon
International Journal of Wilderness
<https://ijw.org/biodiversity-the-language-of-wilderness/>
 - 5) [Forest Resource Considerations for A New Jersey Natural and Working Lands Strategy](#) Feb 2022
"Prepared By: Amanda O'Lear, Rutgers University Marjorie Kaplan, Rutgers University Richard Lathrop, Rutgers University Christopher Idell, Rutgers University Lucas Marxen, Rutgers University Pam Zipse, Rutgers University
Prepared for the New Jersey Climate Change Alliance
(<https://njadapt.rutgers.edu/>) Natural and Working Lands Group Co-Chairs:
Russell Furnari, PSEG Tom Gilbert, NJ Conservation Foundation "
- Original Research
 - 6) Almendinger, Van Clef, Kelly, Allen, Barreca Restoring Forests in Central New Jersey through Effective Deer Management Dec 2021 Ecological Restoration



THE LEAGUE
OF
HUMANE VOTERS®
of New Jersey

POLITICAL ACTION FOR ANIMALS

PO BOX 331

GLEN GARDNER

NEW JERSEY 08826

The League of Humane Voters of New Jersey (LOHVNJ) objects to the New Jersey Forestry Task Force framework and object to the process by which the framework was adopted.

In general, the framework is overly vague and leaves too much discretion for a "scientific advisory panel." The framework's vagueness (such as planning based on "sound science and data") allows for almost any kind of forest policy. Science is not policy. Science can be used to say cutting down a percentage of trees will not endanger the survival of any species, but science says nothing about whether cutting down trees is desirable as a matter of policy. A scientist from a logging company will have very different positions from a scientist from an environmental NGO.

The framework's reliance on public comments in the rulemaking process under the Administrative Procedures Act to counter any proposed regulations that go against public policy is misplaced. The NJDEP has a known history of adopting regulations despite overwhelming public opposition, and challenging such adoptions in court is extremely difficult, given the deference that the court gives to state agencies.

Allowing the sale of wood, for profit, under certain circumstances (Recommendation 15) creates an incentive to cut trees and remove wood when there would otherwise be no incentive. Since there is no ecological reason to remove wood, allowing the sale of wood for profit should not be in the framework at all. If a fallen tree is blocking a road or threatening power lines, it can be moved back into the forest.

Increasing funding to the NJDEP is premature when the policies have not even been developed yet. The statement "all recommendations discussed above require funding" is simply untrue when some recommendations are so vague and some recommendations (i.e. cessation of deer feeding plots on state lands) require no funding.

We also object to prescribed burns, which create the edge habitat that is preferred by deer. While LOHVNJ believes that deer have been unfairly blamed for eating leaves and saplings while developers and loggers continue to clearcut vast swaths of forest for more residential and commercial development, we object to practices that increase the deer population.

Furthermore, regarding deer, the NJDEP has been managing state wildlife management areas for decades to increase the deer herd and grow trophy bucks through practices like prescribed burns and clearcutting

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(to create edge habitat), food plots for deer and farm leases that require farmers to leave crops standing for deer. The NJDEP even partners with private hunting clubs to plant food plots for deer, and then gives awards to the hunters who kill the biggest bucks with the biggest racks. Allowing the sale or donation of venison has nothing to do with reducing the deer herd when the NJDEP keeps the deer herd artificially abundant for hunters. As a side note, such meat is not inspected by the USDA and may be unsafe, and staff at one food bank has told us they have no interest in venison donations from hunters.

LOHVNJ also objects to the statement, "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." The state should be reassessing their forest management plans and there is no reason to wait for those plans to expire before adopting new plans that will fight climate change, sequester carbon, protect trees, and preserve wildlife habitat.

LOHVNJ also objects to the process by which the framework was approved. While task force members were allowed to submit proposals, we were not allowed to communicate with each other and were not allowed to author any part of the framework.

The entire framework was written by the four co-chairs. Communication was always through the co-chairs, and the co-chairs decided which proposals would be included in the framework or even discussed at meetings. Task force members were prohibited from emailing all other members, and chat among members was disabled during the Zoom calls, so the discussion was under the co-chairs' complete control. When a member was allowed to present their proposal to the entire task force, there was no vote on the proposals. The co-chairs decided in what way, if at all, a proposal would be included in the framework. Because members were not allowed to communicate with each other and the co-chairs authored the entire framework, this framework does not represent the views of the task force members. Lastly, the task force presented unrealistic deadlines for submitting proposals and for commenting on the final framework. Proposals were originally due June 30, 2022 and representatives of several organizations pointed out that there was not enough time to obtain approvals from their organizations, so the deadline was pushed back to July 5: a 5-day extension over a 3-day holiday weekend. One of the co-chairs even joked that task force members should spend their holiday weekends writing proposals.

Similarly, the voting process is completely opaque and unjust. Task force members were told that the votes of organizations will count more than the votes of individuals, which is fair, but some organizations were given more votes than others, based on an unfair assessment of whether an organization's members count as "members."

And now, task force members are being required to submit their views on the final proposed framework during the last two weeks of December. For many organizations, this requires getting board approval. We suspect that we are not the only members to be spending our holidays and family gatherings writing, discussing, and approving our positions in order to meet the task force's unrealistic deadlines. The task force deadlines have had the effect of minimizing proposals and minimizing dissenting opinions, appearing to intentionally make it extraordinarily difficult to do anything more than say, "We agree."

Prepared by Doris Lin, LOHVNJ NJ Forest Task Force representative.

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Dear Mr. Hansen and Ms. Cocroft,

The League of Humane Voters of NJ was a member of the NJ Forestry Task Force. Attached is the full dissent that was sent to the co-chairs of the task force. Our full dissent exceeded the character limit that the co-chairs set, so this document supplements the abbreviated dissent that might be considered official.

The character limit on the dissent is yet another example of how task force members were silenced throughout the process.

Please let me know if you have any questions.

Thank you,
Doris Lin, Esq.

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Thank you for this opportunity to comment on the NJ Forestry Task Force Report. The League of Humane Voters of NJ is a member of the NJ Forestry Task Force, and supports a moratorium on all logging on state lands.

The League of Humane Voters of NJ opposes the NJ Forestry Task Force Report for a number of reasons,

*The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. If we truly want to reduce the deer population, we need to end programs that increase the deer population. For example, food plots are used to create larger deer and more hunting opportunities: <https://tinyurl.com/Food-Plots-Deer> In New Jersey, the Division of Fish & Wildlife plants food plots for deer on state wildlife management areas: <https://dep.nj.gov/njfw/conservation/manasquan-wma-wildlife-food-plots/> Also, farm leases on state wildlife management areas should not require farmers to plant extra crops for deer. This site explains that farm leases “require that farmers plant crops...on WMAs separate from their leased fields,” which “(produce) more wildlife habitat.” <https://www.nj.gov/dep/fgw/wmaleases.htm> This announcement of farm leases from last year explains that in-kind services are required “to benefit New Jersey wildlife and wildlife-related recreation”:
https://www.nj.gov/dep/fgw/news/2021/farm_lease_auction21.htm This sample farm lease explains in Section 3 that farmers will be expected to plant and maintain a crop, but the farmer “shall not be permitted to harvest the crop”:
https://www.state.nj.us/dep/parksandforests/parks/business_ops/docs/Fish_Wildlife_Draft_Farm_Lease_and_Service_Agreement.pdf These are deer-preferred crops that are left standing to feed and grow the deer herd. Also, on state wildlife management areas, the Division will use clear cutting and prescribed burns to create fields in the middle of the forest, which creates the edge habitat that deer prefer. The edge where the forest meets a field is where tender saplings and shrubs grow, and that abundance of food creates an abundance of deer. A well-fed deer is a well-bred deer, because if food is scarce, a pregnant doe will resorb an embryo or two. If there is plenty of food, there will be more twins and triplets in the spring.

*Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

*Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as “market hunting.” Larry Herrighty’s statement on behalf of NJOA (NJFTF Appendices, p.41) opposes the Report’s proposal of commercial use of deer, and says it is an inappropriate use of public land.

*Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

*Too much discretion is left to a “science advisory panel.” We know that industry scientists will support more timber sales, which destroys wild habitats.

*Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

*One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals.

Also, a great deal of scientific information is being submitted by Sue Russell of the Animal Protection League of NJ, our sister organization.

Thank you,
Doris Lin, Legal Director
League of Humane Voters of NJ

Dear Senator Smith and committee members:

As a member of the task force, I was tempted to resign from this process, but I stayed on to see if reason would overcome the inherent conflicts of interest, industry alliances, and stacked leadership.

I was dismayed that the status quo remains, and the process was a sham. These are my top concerns:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not suitable for anyone and is just a public relations stunt to make hunting more socially acceptable. The USDA does not inspect meat from hunting, and it could contain lead shot, which is still legal for deer hunting in New Jersey. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

APLNJ's Wildlife Policy Director, Susan Russell, has studied deer for over 40 years. See excerpts of her work below. The committee should embrace her vast institutional knowledge if we want to develop a coherent deer policy for our state.

Right now, New Jersey's deer management is incoherent: feed deer on the one hand, kill them on the other. If this were an objective proceeding, we must:

1. First, stop the harm: reverse systemic game management ("young forests") for wild turkey, non-native and captive-raised ring-necked pheasant, partridge, bobwhite quail and cottontails. These landscapes yield more deer.
2. Cease managing leased or owned stewardship lands expressly for white-tailed deer via food plots, crops, and cuts. Deer-preferred crops near woodlands, thinned or logged forests, and early successional growth generate more food and, consequently, more deer. United Bowhunters puts it this way: "Plan an ambush with science," otherwise known as logging, mowing, or planting seeds.
 - According to Penn State: "If you're looking for a well-stocked buffet, early successional habitat (regenerating forest stands less than 6-8 years old) provides 1,000-2,000 lbs/acre of hoof-licking goodness in the form of woody browse, forbs, and soft mast.
 - <https://deerassociation.com/manage/food-plots/>
 - Techniques recommended expressly for deer for a healthy deer population.
 - See food plots currently recommended by Quality Deer Management in South Jersey here.
3. Of major import is a statewide ban on bait for deer and black bears. Bait increases deer density, reproduction, conflict, and predation of ground-nesting birds. It drives the transmission of disease. New York and Pennsylvania don't allow it. In multiple studies, baiting deer causes changes in tree species composition. It retards forest regeneration by concentrating deer that continue to feed on natural browse.
4. Reforestation. Intact, mature forests mean fewer deer and are home to many other species of no less value than warblers. Proforestation representatives on the task force adequately have the vast ecological and climate benefits of intact forests. Contiguous forest and canopy, on the other hand, produce fewer deer. See here: Intact forests have fewer deer, leading to hunter complaints. Where practicable, allow and develop policy to encourage and protect regrowth.
5. Allow fertility control in our state. Despite wildly inaccurate information disseminated by anti-deer activists, sterilization is proving highly effective in open populations in other states. Surgical sterilization has significantly reduced local deer populations in Virginia, California, Michigan, New York, Ohio, and Maryland. While fertility control may not be suitable for every site, it is a viable and safe method in appropriate settings, including open populations. The key to reducing the deer herd is lower fertility. Hunting does not reduce fertility in individuals; it either stabilizes higher breeding rates or as recorded in New Jersey, increases fertility by improving habitat. Lethal removal will always require more killing.

Controlled hunts spanning decades in New Jersey, with little or no change in forest regeneration or collisions, self-evidently sustain annual hunting.

6. Place a moratorium on all logging in New Jersey.

A few more points:

7. See: Forest ecology shapes Lyme disease risk in the eastern US, Cary Institute Tick Project:

Predators, acorns, & fragmentation regulate numbers of infected ticks (Millbrook, NY) In the eastern US, risk of contracting Lyme disease is higher in fragmented forests with high rodent densities and low numbers of resident fox, opossum, and raccoons. These are among the findings from an analysis of 19 years of data on the ecology of tick-borne disease in a forested landscape, recently published in the journal Ecology. (Monday, July 9, 2018).

8. Deer are not prime vectors of Lyme disease; mast crops and white-footed mice are. See blue chip national and international sources here.
9. "There is certainly no relationship at all between 20 and 0 deer per square mile. These findings are similar to those from a study conducted across a western Connecticut landscape, which shows that across a range from 12 to 157 deer per square mile there is no trend at all between deer density and (i) vegetative cover, (ii) mature tree and seedling density and height growth, and (iii) plant species diversity (Rutherford and Schmitz 2010). Furthermore, the Rutherford and Schmitz (2010) study was done in urban and peri-urban mixed conifer-hardwood forested areas." (Schmitz, 2021.)

The task force is the latest attempt to force an unwanted consensus for commercial logging of Northeast hardwood forests and the corresponding destruction of deer.

Angi Metler



Support Roaring Rock Park

February 20, 2023

Dear Senator Smith and Members of the Senate and Assembly Environment Committees,

I participated in the NJ Forest Task Force convened by Senator Bob Smith. I represented a grassroots group that was formed to oppose commercial logging in a 395-acre wooded park in Washington Twp., Warren County. The park is Roaring Rock Park and the group was originally named Save Roaring Rock Park. I am extremely pleased to report that public pressure brought the logging operations to a close after the first season of logging. Now our group is re-named Support Roaring Rock Park, otherwise known as SRRP.

In that capacity as supporters of Roaring Rock Park, our group is opposed to the task force recommendations as presented at the joint legislative committee hearing on Feb. 22, 2023. Our experience halting logging in Roaring Rock Park has taught us exactly how easy it is to initiate a commercial logging plan on publicly owned land.

To describe briefly the history of events, after Hurricane Sandy blew down a number of trees in Roaring Rock Park, Washington Township officials investigated removing damaged or blown down trees from the park. They contacted Green Acres, who funded the purchase of the park, and found that they would need to hire a state-certified forester to create a forestry plan that needed approval from the NJ Division of Parks and Forestry. The idea languished until a few years ago when it was revived with the idea that the township could realize added income from selling trees in the park. They hired the forestry firm of Gracie and Harrigan to create a Forest Management Plan that was approved for the park by the NJ Division of Parks and Forestry. After this approval was gained, it became known that this plan existed and public opposition grew. The township committee

decided to hold a public hearing to explain the plan. This was after the fact of approval and signing of contracts for logging operations. As an aside, Gracie and Harrigan not only created the plan but was hired to oversee its implementation. They were to receive a percentage of the returns on the sale of logs. They also were charged with hiring a logging company, Heacock Lumber in Ottsville, PA, which was found to be a violation of laws requiring a public bidding process for the logging.

The first phase of logging began in the spring during nesting season for birds and many other animals. In addition to this, the ground was very soft and heavy logging equipment severely damaged soil and tree roots, eventually killing a number of standing trees. Felled trees, and there were many, were filled with nests at this time of year and no one will ever know how many nests were destroyed. Logging was carried out almost in the water of a tributary to the C1 designated Brass Castle Creek. Slash was allowed to fall in the water and nothing was done to prevent stormwater runoff or silt from the mud creating by logging equipment to enter this tributary. Complaints were registered with the Division of Parks and Forestry and a few meager efforts were undertaken after the fact to mitigate some of the damage, but they were by far not the "standard of care" for the damages done. After the logging operations were completed for the season there were several large rain events that took place, including Hurricane Ida, that washed untold amounts of silt and slash into the water and the Brass Castle Creek. The forestry plan had stated that logging "should" be done in winter when the ground is frozen or late in the summer when it is more likely to be dry. Instead logging commenced in spring and was followed by several huge rain events. The forestry plan called for certain best practices, such as a 65' buffer along the banks of C1 water and avoiding allowing slash to enter the water, that were not employed. The plan also advised site remediation after logging, a suggestion rejected by the township government. So, the minimal safeguards described in the forestry plan were meaningless in practice.

The NJ Highlands Coalition appealed to John Cecil, Assistant DEP Commissioner and head of the Division of Parks and Forestry, pointing out that there are many important public trust resources in this park that were and would continue to be damaged or destroyed by logging. C1 waterways were at the top of the list, as was wildlife habitat, a rare heritage strain of native and naturally reproducing trout in the fishery of the Brass Castle Creek, flood mitigation provided by the wooded landscape on steep slopes, clean water for drinking and very important

was a source of recreation for the communities in Warren County and the State of NJ.

Mr. Cecil replied that there was nothing amiss about the process that resulted in logging this park and there was no legal bar to it. Therefore, there was no justification for him to revoke the approval of the logging plan.

It is extremely important for the Legislature to understand that there is no regulation of logging on public land separate from the process created for private landowners to get a tax abatement for an agricultural use of land. Therefore, there is no public hearing process before plan approvals are granted or process for the public to challenge approvals. This applies to land *owned by the public* and typically bought to protect it from some kind of unwanted development. In fact, because logging is legally an agricultural activity, logging operations *are exempt* from regulations that otherwise protect land being developed and disturbed.

Another key misunderstanding is the purpose of forestry. Forestry is an agricultural activity which seeks to produce wood products. Goals include creating the maximum number of the desired or most valuable trees of a size that will produce adequate profit when harvested. Also, forestry seeks to continue to harvest trees from an area of land into the foreseeable future. Forestry plans typically last 10 years but can be renewed for decades. In northeast NJ forests, like those in the Highlands, the typical target species for loggers are oaks and tulip poplars. Forestry plans seek to create ideal growing conditions for as many oaks and poplars as possible. Other trees might be harvested for firewood or bio fuels but are not cultivated, as are oaks and poplars. Any benefits to wildlife from logging would be limited to those species of fauna and flora that can rely mainly on food and shelter provided by oak and poplar trees. That would exclude the Federally-listed Endangered Indiana Bat, known to live in the bark of shagbark hickory trees, a tree species of little value to foresters that would likely be eliminated from managed forests for use as firewood. Wildlife would also need to be able to adapt to periodic, indiscriminate removal of large swaths of trees and the damage that occurs in that process.

SRRP cannot support the task force recommendations because they perpetuate logging for profit on public lands in a number of ways. The task force leaders did not allow any discussion of the exemptions from land use regulation granted to forestry activities. We and others maintain that the current way the DEP is

approving these plans is illegal because it is using a permitting framework that is specifically intended for private property and for tax purposes of private property owners. That process cannot be applied to publicly owned land, which is not taxed. These exemptions created significant damages in Roaring Rock Park and also Sparta Mt.

Recommendation 15 of the task force report implies in one sentence that there should be no commercial logging on public lands:

The NJDEP should not include commercial profit as a goal in any forest management plan* on public land. Commercial timber management should not be a goal for any forest management plan on public land.

But in the next sentence says that logging should be allowed on public land for certain undefined purposes:

Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.

**includes Ecological Restoration Plans, Natural Resource Stewardship Plans or other plans on public forested lands*

This statement cements the status quo that the public is witnessing with horror. The plan to log Roaring Rock Park was approved under the premise that it was intended to improve the health of the forest by thinning the trees. This same plan, with all its exemptions and profit motives, would still be approvable under Recommendation 15. This is completely unacceptable.

The task force recommendations do not have any guiding principles or goals. This is a fatal flaw. Lots of inventory and planning is proposed, but with no particular purpose expressed. We believe the unstated purpose of creating a forest inventory is to find areas to log with less likelihood of successful public opposition. A forest inventory could be an incredibly valuable step if the goal was to determine how we might best increase carbon sequestration in our existing public forests and how we might create more contiguous canopy to benefit the interior forest species that have few areas of habitat left in NJ due to canopy clearing and forest fragmentation. For an inventory to have meaning, goals for the use of our forested public lands would need to be agreed upon and this was not possible in the task force process.

SRRP advocates for making the goal of forest management twofold. One goal should be to increase carbon sequestration in our public forests by allowing trees to remain in the forest, either standing or decomposing. It has been repeatedly demonstrated by scientific research that mature deciduous trees with lots of leaves sequester far more carbon in each tree than even a large number of smaller trees that do not have large leaf area. We should prioritize allowing native trees in our mature forests to continue growing, as well as preventing these mature forests from being converted to other uses. The Princeton University Net Zero America study demonstrates that stopping deforestation is the best way to increase the carbon sequestration of forests in NJ as well as nationwide. Protecting forests to increase carbon sequestration would align with state and national goals to reduce carbon emissions.

The second goal, which is a happy consequence of protecting trees in our forests is that it also would protect the innumerable ecoservices they provide, like filtration of stormwater runoff that cleans water and mitigates flooding, all kinds of habitat for wildlife that rely on intact forests, and one of the most overlooked benefits for our forests, peace and quiet and beauty for people who visit to hike, picnic or just drive by. It is not expensive to simply let forests grow. It is technically entirely feasible, unlike carbon capture or some other high-tech climate solutions. It is also a readily available solution, as NJ already has forested public land. Task force leaders have said that there is somehow a dichotomy between advocating for carbon sequestration in forests and fostering biodiversity, recreation and other forest benefits. In fact, the opposite is true. Protecting forests from logging will readily provide all these benefits, in addition to increasing carbon sequestration. Another big problem for NJ forest health is deer browse. Cutting down areas of forest only increases available habitat for deer, who thrive at the edges of forested areas. Allowing trees to remain standing will reduce habitat for deer in public forests and deer were identified in the task force report as a threat to NJ forests.

One key recommendation that we agree with is the need for state policies codified by statute for management of NJ public forests, adopted pursuant to the administrative procedures act. At the very least, this would ensure that the public has some say in the process of approving management plans for NJ forests.

The idea of letting forests grow is not novel. Since the late-19th century New York state has protected vast acres of forested land under its "forever wild" designation. Far from being "unhealthy", as foresters claim unharvested forests

to be, the effort to protect over 6 million acres of forest in a natural state has been extremely successful. It can be and has been done.

The public will have the last word on what happens to our publicly owned forests and I am confident beyond the shadow of a doubt that the public is opposed to logging and removal of wood products from NJ publicly owned forests. People do not believe that logging is even allowed in parks purchased with Green Acres funding. Sadly, it is allowed. But it should not be and now is an ideal opportunity to take the necessary steps to protect one of our best hedges against climate change as well as a beloved public asset-- our forests.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Oltman". The signature is fluid and cursive, with the first name "Laura" being more prominent than the last name "Oltman".

Laura Oltman
Support Roaring Rock Park

Dear Sir/Madam,

My name is Mitalee Pasricha. I am a steward at Ridgeview Conservancy and a member of the NJFTF. I understand the deadline for sending a letter to the committee was yesterday. However, I hope there is still a possibility to sneak in a few of my words. I've attached my message below. Please let me know if you have any questions.

Sincerely,
Mitalee

Dear Senator Smith, Senator Greenstein, Assembly Member Kennedy and Committee Members,

I am a senior at Princeton High School, a member of the NJFTF and a trail steward for Ridgeview Conservancy. Upon joining Ridgeview Conservancy as a sophomore, I realized the woods were where I belonged. I was able to explore a world teeming with wonder - a sharp contrast from my seemingly monotonous routine. The woods filled me with a passion that I now hope to chase in college. Having the ability to have access to woods completely changed the trajectory of my life for the better. Having the opportunity to be on the NJFTF has allowed me to contribute to protection of our forests and reassures me that perhaps others will have the same chance to call the woods their sanctuary.

From being part of the NJFTF, I have learned that NJ lacks a forest policy that protects our state public forests. Because state forests have been set aside for the public good, I think NJ should have a moratorium on logging until the public, together with legislators, decide on a policy that promotes climate resilience and biodiversity, as well as human health. Personally, I have found that spending time in forests helps me and my friends to lower the ongoing stress and anxiety associated with academia and life in an era of climate change and species extinction. The last thing we need is for these places of solace - public forests - to be razed.

The scientists who presented the most rigorous presentations and who had decades of research experience in New Jersey's forests recommended proforestation. To my understanding, this is the management approach which will achieve the goals we need to protect NJ citizens from the ravages of climate change. Currently, forest management in NJ, by logging mature forests, exacerbates our climate crisis by emitting carbon, rather than protecting the trees which store and sequester carbon.

As a young person, I want to be sure our forests are protected for future generations. We must stop degrading them and begin protecting them.

Thank you again for the opportunity to be part of the NJ Forest Task Force.

Sincerely,
Mitalee Pasricha

388x



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES
DIVISION OF FISH & WILDLIFE

P.O. Box 420

MAIL CODE 501-03

Trenton, NJ 08625-0420

TEL. (609) 292-2965 FAX. (609) 984-1414

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CHRIS CHRISTIE
Governor

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

January 10, 2018

Don Donnelly
New Jersey Audubon
1024 Anderson Road
Port Murray, NJ 07865

Dear Mr. Donnelly,

This letter is to confirm that, on December 14, 2017, the Division of Fish and Wildlife (DFW) accepted New Jersey Audubon's bid on a project to create and implement a forestry practice plan in Stand 18 as identified in Year 1 of the approved forest stewardship plan for Sparta Mountain WMA. NJ Audubon has been approved to begin work on this project, in collaboration with DFW, as of January 4, 2018.

The goal of this project is for the reduction of trees on 18.5 acres at the northern end of Sparta Mountain WMA for the purpose of opening the canopy to allow for oak regeneration and other native vegetation (shrubs, sedges, saplings) that require ample sunlight to grow. The management prescription will be a variable heavy shelterwood with an average Basal Area (BA) retention of about 30 sq ft per acre overall but with patches ranging between 10 and 50 sq. ft per acre. Patches with a residual BA of 10 will not exceed 10 acres in size. Trees to be retained will be the larger, most vigorous co-dominant stems of species that are predominant components of the oak-hickory overstory type (skewed towards retaining a diversity of oak species where possible), while selecting against suppressed and intermediate stems of all species, and also co-dominant stems that are less desirable species for wildlife - or are less desirable due to their increasing abundance within the NJ forest understory (e.g. red maple, black birch, etc.). Boundaries and trees to be retained will be clearly marked. Crowns and some trees will be left on the ground for cover but not exceed the height limit recommended by NJ Forest Fire. Cavity trees will be retained when possible. Tree cutting will take place in the winter (between 11/16 and 3/31) when the ground is frozen. Vehicles and heavy equipment will access the site on existing powerline access roads. Forestry and Wetland BMPs will be implemented as necessary. Herbicide treatment for invasive plants is not needed at this time. Further guidance may be provided after the project is reviewed internally.

Specifically, tasks to be completed by NJ Audubon include:

- Harvest area boundary marking with paint
- Timber marking & tree volume estimation
- Practice and harvesting plan preparation and submission to NJ Forest Service
- State timber contract preparation
- Pre-harvest meetings with prospective logging contractors
- Site inspections for contract compliance during harvesting operations
- Final contract closure and site evaluation inspections

Tree cutting needs to be completed by March 31, 2018. Should inclement weather or other unforeseen circumstances preclude the ability to accomplish tree cutting by March 31, 2018, we will extend the project to resume cutting from November 16, 2018 through March 31, 2019.

Please let me know if you have any questions, and I look forward to working with you on this project.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'Sharon Petzinger', followed by a long horizontal line.

Sharon Petzinger, Senior Zoologist
Endangered and Nongame Species Program
NJ Division of Fish and Wildlife

Cc: Sue Predl
Dave Golden
John Cecil

390x



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www.njaudubon.org

Wattles Stewardship Center

1024 Anderson Road
Port Murray, NJ 07865

(908) 366-7903 Fax: (908) 837-9569
E-mail: don.donnelly@njaudubon.org

Project Quote

Date: January 3, 2019

Landowner: NJDEP Division of Fish and Wildlife
c/o Sharon Petzinger, Endangered and Nongame Species Program

Mailing Address: Lebanon Field Office, PO Box 394, Lebanon, NJ 08833

Property Location: Sparta Mountain WMA, Hardyston Twp., Sussex County

Project: Revised scope of work and cost for project implementation in Stand 18, which has new boundaries as a result of the Highlands Coalition negotiations. The new boundaries negate most of the original work completed on this project to date.

Tax Block(s) & Lot(s): various

Project Acreage: Stand 18 = 12.2

In accordance with your phone and email request to revise the prior quote to accommodate project changes, listed below are activities required to complete the above described project.

- Revisit project site to mark new boundaries with paint (paint included in cost)
- Revised tree marking & tree volume estimation
- Practice plan revised and submitted to NJDEP for review and harvest compliance
- Revise the Timber contract for bid solicitation
- Field inquiries regarding the project and contract specifications from prospective contractors
- Accompany prospective logging contractors on site visits in advance of bid submission
- Meet with NJDEP staff and stakeholders on-site as needed
- Periodic site inspections for contract compliance during harvesting operations
- Final contract closure and site evaluation inspections

Total Quote Amount **\$6,226.00**

Note that this quote replaces the former quote provided to complete the project as it was originally planned. Please let me know if you have any questions.

Thank you,

Don Donnelly
Stewardship Project Director - Forester

Please make check payable to: NJ Audubon 9 Hardscrabble Road, Bernardsville NJ 07924	Please remit payment to: NJ Audubon, Wattles Stewardship Center 1024 Anderson Road, Port Murray NJ 07865
--	--

391x

Re: [EXTERNAL] Re: Request for bids on logging contract

Petzinger, Sharon

Sat 2/23/2019 12:07 PM

To: Sean Lavery <seanwcttrucking@gmail.com>;

Cc: Don Donnelly <don.donnelly@njudubon.org>;

Sean,

I am pleased to let you know that your bid of \$0 on the timber and a charge of \$10,000 for the habitat work has been accepted. As you are aware, the work needs to be completed before April 1, 2019, so we are on a tight timeline. Please provide me with the following by Monday, if possible:

- 1) An official quote for \$10,000 for the tree felling/habitat work
- 2) You are an active registered vendor with the state, but we need verification that all the paperwork is up to date (it needs to be submitted annually). If it's not up to date, then that will need to be done ASAP.
- 3) Proof of insurance

Once everything is in order, I will submit the paperwork to get a purchase order made, which may take a couple weeks. That said, if you are comfortable working off the timber contract while we wait for the PO, you may begin as soon as we get the contract finalized and signed.

Please let me know if you have any questions, and I look forward to working with you and your crew on this pivotal project.

Sharon Petzinger
Endangered and Nongame Species Program
NJ Fish and Wildlife
Lebanon Field Office
PO Box 394
Lebanon, NJ 08833
sharon.petzinger@dep.nj.gov

PLEASE NOTE NEW PHONE NUMBER:

9-

From: Petzinger, Sharon
Sent: Friday, February 22, 2019 3:12 PM
To: Sean Lavery
Subject: Re: [EXTERNAL] Re: Request for bids on logging contract

Sean,

Thank you for submitting a bid on this project.

We are considering your option and will get back to you early next week with a final decision.

Sharon Petzinger
Endangered and Nongame Species Program
NJ Fish and Wildlife
Lebanon Field Office

392x



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(908) 366-7903 Fax: (908) 837-9569
E-mail: don.donnelly@njaudubon.org

Project Quote

Date: August 22, 2018

Landowner: NJDEP Division of Fish and Wildlife
c/o Sharon Petzinger, Endangered and Nongame Species Program

Mailing Address: 1 Van Syckles Rd, Clinton, NJ 08809 **Phone:** (908) 638-5102

Property Location: Weldon Brook WMA, Jefferson Twp., Morris County

Project: Weldon Brook WMA Forest Stewardship plan implementation year 2018-2019.

Project Acreage: various (described below)

Below is a description of activities to be performed as outlined in the Weldon Brook Forest Stewardship Plan, which may be altered based on guidance from staff within NJDEP:

1. Modified Seed Tree Harvest: Up to 42.8 acres (see map)
 - o Conduct modified seed tree harvests in up to 5.1 acres in Stands 1-1-1 and 1-1-2 in the Golden-Winged Warbler Management Area and the General Forest Management Area.
 - o Conduct modified seed tree harvests in up to 37.7 acres in Stand 1-1-2 in the Golden-Winged Warbler Management Area and the General Forest Management Area.
 - o The purpose of this prescription is to reduce the canopy trees to allow for oak regeneration and other native vegetation (shrubs, sedges, saplings) that require ample sunlight to grow.
 - o The management prescription will be a variable seed tree harvest with wildlife reserves with an average Basal Area (BA) retention of about 30 ft²/acre overall but with patches ranging between 10 and 50 ft²/acre. Patches with a residual BA of 10 ft²/acre will not exceed 10 acres in size. Trees to be retained will be the larger, most vigorous co-dominant stems of species that are predominant components of the oak-hickory overstory type (skewed towards retaining white oak and a diversity of oak and hickory species where possible), while selecting against suppressed and intermediate stems of all species, and also co-dominant stems that are less desirable species for wildlife - or are less desirable due to their increasing abundance within the NJ forest understory (e.g. red maple, black birch, etc.).
 - o The exact locations and boundaries will be delineated based on a number of parameters outlined by NJDEP Staff, some of which include adequate advance regeneration and the presence of endangered, threatened, and rare plants and animals. Boundaries and trees to be retained will be clearly marked. Crowns and some trees will be left on the ground for cover but not exceed the height limit recommended by NJ Forest Fire. Cavity trees



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E-mail: don.donnelly@njaudubon.org

will be retained when possible. Depending on pre-harvest planning, some of these areas may receive deer exclusion fencing

2. Forest Stand Improvement/Individual Tree Selection: Up to 110 acres (see map)

- o Conduct 15 acres of forest stand improvement thinning within Stand 1-1-1 in the Golden-Winged Warbler Management Area, General Forest Management Area, and the Riparian Buffer Management Area.
- o Conduct 45 acres of forest stand improvement thinning within Stands 1-1-1 and 1-1-2 in the Golden-Winged Warbler Management Area, General Forest Management Area, and the Riparian Buffer Management Area.
- o Conduct forest stand improvement thinning and/or individual tree selection harvests on 50 acres within Stands 1-1-1 and 1-1-2 in the Golden-Winged Warbler Management Area, General Forest Management Area, and the Riparian Buffer Management Area.
- o This prescription will retain a variable density of mature desirable canopy trees >12" dbh, such as white oak and various hickory species, within each site but maintain an average Basal Area between 60 and 70 ft²/acre.
- o The exact locations and boundaries will be delineated based on a number of parameters outlined by NJDEP Staff, some of which include adequate advance regeneration and the presence of endangered, threatened, and rare plants and animals. Boundaries and trees to be cut, girdled, or removed will be clearly marked. Crowns and some trees will be left on the ground for cover but not exceed the height limit recommended by NJ Forest Fire. Cavity trees will be retained when possible. Depending on pre-harvest planning, some of these areas may receive deer exclusion fencing

3. Competing understory vegetation removal: Up to 100 acres.

- o Accomplish 20 acres of competing understory vegetation control in Stands 1-1-6
- o Accomplish 40 acres of competing understory vegetation control in Stand 1-1-3
- o Accomplish 20 acres of competing understory vegetation control in Stands 1-1-6 and 1-1-3
- o Accomplish 20 acres of competing understory vegetation control in any stand where needed.

5. The exact locations and boundaries will be delineated based on a number of parameters outlined by NJDEP Staff, some of which include adequate advance regeneration and the presence of endangered, threatened, and rare plants and animals. Boundaries and trees to be cut, girdled, or removed will be clearly marked. Crowns and some trees will be left on the ground for cover but not exceed the height limit recommended by NJ Forest Fire. Cavity trees will be retained when possible. Depending on pre-harvest planning, some of these areas may receive deer exclusion fencing

1. Group selection: Up to 3.25 acres

- o Up to 3.25 acres located within the Riparian Buffer Management Area and Future Old Growth Forest Management Area will be cut under a group selection system at a rate of 1/4 acre per group and 1/4 acre per group, respectively. This area includes portions of Stands 1-1-1, 1-1-2, 1-1-3, and 1-1-4.
- o The exact locations and boundaries will be delineated based on a number of parameters outlined by NJDEP Staff, some of which include adequate advance regeneration and the



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presence of endangered, threatened, and rare plants and animals. Boundaries and trees to be cut, girdled, or removed will be clearly marked. Crowns and some trees will be left on the ground for cover but not exceed the height limit recommended by NJ Forest Fire. Cavity trees will be retained when possible. Depending on pre-harvest planning, some of these areas may receive deer exclusion fencing

Total RFP Quote Amount

\$18,000.00

Please let me know if you have any questions regarding this proposal.

Thank you,

Don Donnelly
Stewardship Project Director - Forester

Please make check payable to: NJ Audubon 9 Hardscrabble Road, Bernardsville NJ 07924	Please remit payment to: NJ Audubon, Wattles Stewardship Center 1024 Anderson Road, Port Murray NJ 07865
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Sent by Email

Animal Protection League of New Jersey Comments, "New Jersey Forest Stewardship Task Force"

Re: New Jersey's forests are not "working" for out-of-state manufacturers. Nor is our wildlife up for sale.

Chairman Smith and Members of the Committee:

The Animal Protection League of New Jersey opposes the slippery nature of this entire exercise. It's stacked.

A task force dissenter put it this way:

"Since the framework as written will not protect New Jersey's public forests from industries, agencies, organizations and individuals who seek to profit from them or misuse them, I cannot support it."

Sharon Wander, B.S. Wildlife
Management, Cook College; Ph.D.,
Ecology, Rutgers University

Making Dr. Wander's point, just the other day, the Division of Fish and Wildlife was caught clear-cutting 21 acres of an intact forest in the Glassboro Wildlife Management Area. The cut was for woodcock, a hunted bird, and in violation of wetlands rules. Your recommendations are sending everything their way.

Frustrated by the Legislature, gunning, timber, and related "stewardship" businesses are attempting to portray "young forests"--- a uniquely inventive way of describing logging -- as a government edict.

From conflict of interest to weighted votes to weighted membership; from unelected leaders changing the rules as they go to "out of the limelight" firearms industry architects and a veritable geyser of taxpayer grants, the contrivance offends basic tenets of fair play and transparency.

- The Legislature did not request or appoint the forestry task force.

396x

- The sponsor of unpopular logging and deer kill legislation that for thirteen years failed to become law created the task force.
- The unelected leaders of the task force are the same parties that lobbied for the failed legislation.
- The task force recommends that the Legislature vest untrammelled power over forests and deer to the offending Department of Environmental Protection (DEP) by “directing” the DEP to assess, test, and carry out a range of logging, burning, and deer killing proposals that could not be obtained by democratic, legislative means.
- The DEP’s Division of Fish and Wildlife (DFW) and Fish and Game Council (FGC) represent hunters, whose national trade association created the logging initiative to produce more wild turkeys, grouse, bobwhites, woodcocks, rabbits, and other “small game.” There is a snowball’s chance in hell that the DEP process will be fair. Public comment is a chimera: DFW ignores public comments over 90 percent opposed to its proposals.
- Audubon’s former vice-president for stewardship (logging and fire) and logging promoter is now assistant commissioner, director of parks and forestry for the DEP.
- We are to respond to the stacked task force “recommendations” as we would an administrative rule: the public has “three weeks” to file responses with Office of Legislative Services.
- In effect, the sponsor of the unpopular legislation will weigh the comments.
- Consensus of what, exactly? Virtually any interest in New Jersey could cobble together its supporters to produce a consensus.
- The pre-determined “consensus” and recommendations are the same, self-interested parties, businesses and their clients, even a meat market, that lobbied unsuccessfully for the legislation.

Sparta Mountain logging pitted the New Jersey Audubon Society and its partner, the Division of Fish and Wildlife, against every environmental group, local municipalities, and residents.

Despite thirteen years of sustained and broad opposition, objections that Audubon had a commercial interest, Senator Smith listened to no other parties, swatting away environmental leaders, municipalities and national and state wildlife protection organizations as so many gnats.

Under his myopic chairmanship, not a single piece of legislation to protect hunted or trapped animals has been released from the Environment and Energy Committee for nineteen years. This, in the metropolitan state of New Jersey. Hunting and trapping deregulation and bills that expand the activities glide through. The Senate Environment and Energy Committee belongs to the people of the State of New Jersey, not Bob Smith and wise-use lobbyists.

Enabled for nearly two decades by brazen favoritism, the Audubon-Division of Fish and Wildlife regime has consolidated its *de facto* ownership of New Jersey public land and wildlife. They are behind the bold move to further privatize and monetize these precious resources.

The shooting industry (Wildlife Management Institute) and its hoary, good ole boy alliances in Washington, D.C., have given us a whole new lexicon, if we let them pull it off.

They've decided that our forests are longer just forests, unto themselves; they are "working forests," working, it turns out, to provide timber and blood sport recreation (and sales) for a shrinking minority, and favored species for others.

Outmoded game management, devalued as harmful to many forest interior species, has been rechristened "stewardship." Taxpayer dollars are siphoned off to pay for it, laundered through private "stewardship" conservation entities who manage forest habitat for shootable woodcock and quail, and using "species of concern" moneys to do it.

We will be forwarding other materials related to this matter. Given the past nineteen years, we do not expect, nor will we obtain, fair consideration. Our chief concern, in this letter, is process, and the facade that this is anything but another lobbying gambit.

New Jersey's forests are not "working" for out of state manufacturers. Nor is our wildlife up for sale.

Sincerely,

Susan E.
Russell
Wildlife Policy Director

Animal Protection League of New
Jersey

398x

Pg 97, "Forest Stewardship Task Force Report."

For thirteen years, the New Jersey Chapter of the Sierra Club was a stalwart opponent of logging, fire, and extreme measures that expanded boorish poaching practices to kill deer. A task force member wrote: "(I hope NJ Sierra Club under new leadership remains last true group & refuses to sign off on this)" – "Larry Baum minor in mathematics; BSc. in conservation biology, biology and physics; Ph.D. in Theoretical Physics (& worked with forest conservation. .
." Unfortunately, Dr. Baum's fears appear to have been realized: the new leadership backed the plan, and not without controversy.

The Assembly twice passed the CR to redress a rogue NJDFW regulation allowing a modified leghold trap. A majority of senators committed to supporting the resolution; Senator Smith refused to hear or release the bill.

March 15, 2023

The NJ Senate Committee on Environment and Energy, and
The NJ Assembly Committee on Environment and Solid Waste
State House Annex
PO Box 068
Trenton, NJ 08625-0068

Re: Input Regarding New Jersey Forest Task Force Report

Dear Sen. Smith, Sen. Greenstein, Sen. Codey, Sen. Durr, Sen. Stanfield, Asm. Kennedy, Asm. Stanley, Asm, Guardian, Asm. Haider, Asm. McCarthy Patrick, Asm. McKeon, and Asm. Scharfenberger,

I have attended the New Jersey Forest Task Force meetings with interest, and I applaud you, Senator Smith, for catalyzing these critical discussions. I am particularly impressed at the progress the Invasive Species Subcommittee of the Task Force is making. Invasive species legislation is an important step forward.

As a forest ecologist with 40 years research and teaching experience in temperate and tropical forests – including the Brazilian Amazon with the Woods Hole Research Center, in Indonesia with the Center for International Forestry Research (CIFOR), and in New Jersey working with youth in forests, with Collier Services, Woods & Wayside International, and Ridgeview Conservancy -- I would like to share a few observations.

During the last three years I have been honored to serve as a member of two Global Expert Forest Panels and as a co-author of two international forest and biodiversity assessments:

- The UN Intergovernmental Panel on Biodiversity and Ecosystem Services (IPBES) (94 members); and
- The Global Expert Forest Panel on Human Health and Forests, sponsored by the International Union of Forestry Research Organizations (IUFRO) (16 members).

During my time on these expert panels, I have not encountered a single scientist or policymaker in support of the logging of intact, protected forests. To the contrary, there is a global scientific consensus that we urgently need to preserve mature forests and to halt forest fragmentation to stave off a climate catastrophe and the threat of widespread extinction. Given the high human population density of New Jersey, these measures are particularly critical.

Clearly, society needs timber. Under the right conditions and in suitable locations, logging can be sustainable and can promote healthy regeneration of future forests. On three continents, I have worked with researchers and foresters engaged in timber extraction to support forest management which takes into consideration ecological and human health. In New Jersey, however, State Parks and Forests comprise only an estimated 8.0 % of the state's total land area and should be set aside for the broad public good, specifically conservation and recreation, not timber extraction.

I realize that it must be dizzying for you and all those on the committee to be confronted with so many disparate views on the state of forests in New Jersey. Two Images may help to clarify.

400x

First, imagine a vista of a logged forest, next to an intact, older woodland. Consider which will store more carbon; mitigate the effects of climate change like flooding, drought, and extreme heat; sustain greater biodiversity and wildlife populations; filter, store and produce high quality water; and support human health. This is not a trick question. A four-year old can answer correctly, with confidence. Internationally, scientists concur with the conclusion drawn by almost any member of the public.

Forests in New Jersey have a big job. They sequester carbon and maintain a healthy environment for our communities, and yet they are already in the intensive care unit. At unprecedented levels, our forests are battered by hurricanes, pests, invasive species, and deer, and 25 million ash trees, representing 9% of New Jersey's forests, are succumbing to the emerald ash borer. As climate change predictions make clear, more powerful diseases and storms are imminent. Forests are the most reliable and cost-effective 'technology' to buffer humanity from the perils of our warming planet. Do we want to exacerbate their decline?

Now, imagine a tar-paper shack in a woodland on the Princeton Ridge where a man writes a novel, destined to become a classic, *The Jungle*. Over one hundred years later, in this same woods, two hundred high school students labor over the course of ten years to preserve the forest, to remove invasive species, and to create public trails. Three of these dedicated students, Kate, Kyleigh, and Mitalee, enthusiastically take part in the NJ Forest Task Force during their demanding junior and senior years of high school. Regrettably, their idealism takes a hit. Over the course of the task force proceedings, they ruefully learn that a quote by Upton Sinclair in *The Jungle* regarding vested interests is all too relevant to New Jersey's forest policy: "It is difficult to get a man to understand something when his salary depends upon his not understanding it."

For the sake of our children's future and our threatened, vulnerable forests, New Jersey legislators need to heed global scientific consensus, and the voices of our state's citizens, to ensure that public forests remain protected. These forests not only store carbon and offer habitat for endangered wildlife, but they also restore mental and physical health to New Jersey youth and families in desperate need. As Chief Mann of the Ramapough Lenape Nation states: "The health of our forests reflects the health of our community."

New Jersey is extremely fortunate to have knowledgeable climate, forestry, and policy scientists with decades of expertise who have diligently contributed to the NJFTF discussions. With the addition of key revisions by these experts and other knowledgeable NJFTF members, including not allowing logging or wood removal in state and public forests, much of the current report represents a solid foundation to guide forest policy in New Jersey.

Sincerely,



Patricia Shanley, PhD.

Program Director, People and Plants International
Associate Director, Woods & Wayside International
Director of Stewardship, Ridgeview Conservancy



Figure 1: Recently Conserved Forest on the Princeton Ridge.



Figure 2: Site of Logging in New Jersey State-Managed Public Forest.

402x

I am writing this email to inform you of my opposition to the above report. It is detrimental to wildlife and forests in NJ. Wood from state forests from public land should not be sold. I am also against the commercial sale of hunted deer meat.

Yours truly,
Patricia Westerfer
109 Preakness Dr
Mount Laurel, NJ
08054

Sent from my iPad

403x

Dear Senate Environment and Energy Committee and Assembly Environment and Solid Waste Committee,

As an active participant in all the Forestry Taskforce meetings, even the subgroup on the regulatory committee, I am submitting additional testimony to help the legislature understand the issues pertaining to the NJ Forest Stewardship Task Force Report and the "Final Recommendations February 2023" document.

Our group, NJ Forest Watch, has for 7+ years documented the irreparable ecological harm that "forest stewardship plans" created by the NJDEP Division of Fish and Wildlife along with their private partners who mark the trees, NJ Audubon, and the loggers who remove the public timber have caused. This is a violation of the public trust, as many of our public lands are funded by Green Acres funds and are supposed to be held in the public trust. While our group submitted a thorough report of 37+ pages, I wanted to submit personal testimony as unlike many of the groups who support public lands forestry, our group **does not receive** financial incentives for writing, or in the implementation of forestry activities. Many groups, like the NJDEP, NJ Audubon, the NJ Forestry Association, the outdoor sportsmen groups like NJOA and others, all receive grant funding available through the USDA. While we are ok, with the funding component, we are **NOT ok with the removal of public trust resources - timber specifically.**

Young forest habitat can and should be "created" on post agricultural lands and brownfields and the above groups need to re-direct their misguided approach which is destroying our healthy intact forests of the Highlands and Pinelands region, and adopt instead a "do no harm" philosophy.

The intent of the taskforce was to create recommendations to address the climate and ecological health concerns pertaining to the management of public lands, and instead the final report is a consensus document crafted by the major financial benefactors of public lands management: NJ Audubon, NJ Forestry Association and the NJ Conservation Foundation.

Here is a summary of the issues pertaining to the Forestry Task Force Final Report:

1. The majority of the four co-chairs that were chosen to head the taskforce receive financial contributions to their organizations and hence are biased in the management of public lands. Their motives, while seemingly broad and vague at times, are mostly financially driven(although they do not disclose this), and hence they should not be part of the decision making of how our public lands are managed. There is an inherent bias here!
2. An example of this was seen in the September 19th meeting where NJ Audubon failed to disclose to the public and to those participating in the taskforce that they receive money for the implementation of logging plans throughout the state. I, the Executive Director of NJ Forest Watch, provided the four co-chairs documents that showed NJ Audubon had in fact received funds from the NJDEP for writing logging plans for Sparta Mountain and Weldon Brook WMA's. (some of the OPRA results show contracts to NJ Audubon of \$6,226, \$10,000 and \$18,000)
3. The task force chairs hand selected proposals that were less controversial and that supported the status quo, instead of following the current science that demonstrates keeping forests intact, is the best solution for climate defense and for our future. (IPCC report)
4. In the "Executive Summary" the task force chairs state that "the co-chairs reached unanimous agreement and a supermajority (2/3) of participants supported the final

framework recommendations' is a non-factual statement, as many groups were excluded from the final report and those who did participate were obligated to "support" the entire framework despite the concerns in several of the Recommendations and especially that of **Recommendation 15**.

5. Initially the co-chairs stated that all policy decision recommendations would be based on the current climate and ecological health science. In fact, it was encouraged that peer reviewed science would be considered but when the supporters of intact forests supplied volumes of peer reviewed climate and biodiversity science, the "Science" discussion was then discarded. Instead, the co-chairs crafted consensus amongst themselves on how they could "SPIN" logging public lands under the vagueness of "logging for ecological health, biodiversity and even for climate resilience". Which all have no peer reviewed science to show for.
6. We asked numerous times for the peer reviewed science that states timber removal is necessary and none was provided. Instead, made up graph charts exist on the NJDEP website to claim success, but no discussion of the harmful effects of logging is ever mentioned. Nor is there ever a discussion of the damage and loss of carbon sequestration from the removal of hundreds of 80-150+ year old trees. Impacts by heavy machinery, to soil, mycorrhizal kingdoms, water supply and invasives species infiltration are also ignored. The co-chairs ignored all discussions of how timber removal destroys biodiversity and creates a carbon sequestration loss **that takes 80 to 100+ years to makeup**. We do not have 80 to 100 years to regain the carbon sequestration that was lost during logging.
7. On page 2 the preference to keep the logging status quo is evident as the report states. "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities". This is unacceptable as our NJ public lands are owned by the people, and not by the NJDEP or the private entities cashing in on NJ public timber.
8. Overall, the final report failed to provide adequate recommendations in the protection and preservation of our public forested lands and hence stronger protections of public lands are needed to ensure we have a clean air and water supply. Furthermore, if we are to take climate action seriously, NJ should not be logging its public forests as keeping intact forests as intact forests is a "no charge" solution we should all be advocating for.

Discussion on the Various Recommendations with Alternative Solutions:

- **Recommendations: 1, 6** On the topic of the "scientific advisory panel". The council **must not** include the very groups that benefit from public lands forestry management, but instead have members from the public who are **PhD Forest Ecologists**, such as Dr. Emile DeVito, Dr. Sharon Wander, and Dr. Sara Webb, along with Ecological Restoration experts like Michael Devos, Bill Young, Leslie Sauer and Blaine Rothauser. The issue with many current scientific advisory councils is that they are stacked with those who benefit from the decisions of the councils. There are many public and private groups who benefit from USDA, and other grants that push public lands logging. The council **is not** to include foresters or forestry organizations, as they rely too heavily on wood product removal and demonstrate a financially motivated bias in their recommendations.
- **Recommendation: 2:** Because our intact forests provide clean air and water to over 85% of the state, we acknowledge and propose that new rulemaking is needed, with stricter guidelines for Highlands/Pinelands watersheds, C1 waterways, vernal pools and areas of

steep slopes, High Conservation Value, like Sparta Mountain WMA, that include **no removal of timber**. Since the NJDEP Division of Fish and Wildlife is one of the misguided organizations who is profiting from public lands logging, they should not be a part of the decision-making process as they are the problem. Our public lands belong to the people of the state, and the people should have the final say in how public lands are managed.

- **Recommendations: 3, 4 & 5 Should not be rushed**, as state-wide inventories need to be completed to accurately assess the ecological ecosystem services that our public forests provide. Forests left alone to sequester carbon, mitigate temperature increases and provide potable water are our **BEST NO COST solution**. Various environmental groups could receive training to help the NJDEP to conduct statewide surveys. (This is something the NJDEP should re-enact, it's Citizen Science Group)
- **Recommendations: 7, 8 & 9** Contains buzzwords that allow for timber removal and hence all management activities that pertain to timber removal need to include the loss of carbon from soils and living trees as part of the cost-benefit analysis. In areas where logging has occurred, tree planting with deer fencing should be advocated. Considerations of the differences between the Pinelands and Highlands forests is noted and has its own merits.
- **Recommendations: 10 & 11** For NJ to meet its state climate goals, we must stop the logging of public lands immediately. **Rulemaking to protect public lands should be codified as NJ only has 1M acres of public forested lands. Being the most densely populated state and with the imminent saltwater intrusion, it will be very important for NJ to protect its current inventory and to expand future forests, not log them.**
- **Recommendation: 12** Please refer to the work by PhD fire ecologist Dr. Chad Hanson of the John Muir Project who has written numerous peer-reviewed articles on how managed forests burn with more intensity than non-managed forests. While we acknowledge the difference forest types of North and South Jersey, the fearmongering of "catastrophic forest fire potential in NJ" is currently a narrative the pro-loggers and NJDEP Fire Service personnel use to justify timber removal but once again true science dictates otherwise.
<https://johnmuirproject.org/2019/01/logging-didnt-stop-the-camp-fire/>
And their website: <https://johnmuirproject.org/>
- **Recommendation: 13** I agree that NJDEP should engage in forestry activities to remove invasive species and create a statewide invasive species team that includes public citizens. We support a citizen training program.
- **Recommendation: 14** I strongly recommend following the science on reducing the deer population and prohibit deer baiting. Deer baiting promotes deer populations and negatively affects our forests' ability to develop a healthy understory. The deer are not the issue, it is our human interactions with the deer that are causing over population and the spread of various diseases.
- **Recommendation: 15** This is the **most egregious of recommendations** as it allows for the status quo or for any "purported reason" public lands can be logged. It states "wood products can be sold in instances where cutting and removal of wood is necessary part of an approved plan with ecological health, climate or other non-commercial goals". This is the very problem of **ALL** current logging plans. This is unacceptable. Instead, the NJDEP needs to be directed to **ecological restoration plans following the International Society of Ecological Restoration or "SER" standards** for ecological management. By following these international standards, removal of wood is not advocated, nor needed. True forest ecological restoration can and should occur without removal of timber.

Also see Leslie Sauer's proposal in the framework appendix as she summarizes these standards.

- **Recommendation: 16** Identification of funding sources is important. There are USDA grants available to the NJDEP, but they must be implemented with a "Do NO Harm philosophy and with **NO removal of public timber**. The current forest stewardship activities promoted at places like Sparta Mountain, Weldon Brook, Roaring Rock Park and now Glassboro WMA serve as examples of what should not occur in the state. The NJDEP Division of Fish and Wildlife in particular needs to be held accountable for their destruction of ecological services on Sparta Mtn and Glassboro WMA's.
- Lastly, **ALL** logging activities throughout the state must be put on a hold until NJ sets aside its public lands for carbon, ecological ecosystem services and biodiversity. If young forest habitat is needed, the NJDEP shall be directed to go to post agricultural and brownfields for their creation. Intact healthy Highlands forests, need further protections and should be left alone for Proforestation.

Conclusion:

While the intent of the taskforce has some merits, the public citizens of NJ who pay for our Green Acres encumbered lands, do not want to have our public forests logged under false pretenses, and so that certain private groups can financially benefit. I encourage the members of both the Senate and Assembly environmental committees to represent not the interested parties who financially benefit from public lands logging, but to do right by its citizens, and protect our natural resources and protect our public forests. While NJ is known as the "Garden State" we must look to renewable alternatives to timber, for example, like hemp and bamboo production.

The current loophole which the NJDEP and others use to allow "forestry" as an "exempt practice" needs to be closed. Instead, we must advocate for **no removal of public timber** from public forested lands. Since NJ only has 1M acres of public lands I encourage the committee members to offer protections of **ALL 1 Million acres** for our future and for the future generations. The state needs to enact a moratorium on all public lands logging and current logging plans until new regulations and protections of public forests are codified under new legislation.

Thank you for your time and attention to this important issue. If you should have any further questions or comments, please feel free to contact me below.

Sincerely,

Silvia Solaun

Participant of NJ Forestry Taskforce
Founder and Executive Director of NJ Forest Watch
Member of the NJ Highlands Coalition Natural Heritage Committee
Member of NJ Highlands Coalition
Member of Save Public Forests
Member of National Park Foundation
Former Member of NJ Sierra Club
Masters Degree in Science

Joey,

Hi. I hope you are getting some of the information from the DEP about the number of acres of public lands stewardship and in the meanwhile I thought I would share with you some of the contracts where it clearly shows NJ Audubon receiving payment for public lands logging on both Sparta Mtn and Weldon Brook WMA. (Both Green Acres properties) . This is unacceptable.

This was an issue we brought forward early on the taskforce process and Eileen Murphy herself denied that NJ Audubon was making money from public lands logging and so I sent all 4 co-chairs these and several more of the contracts.

What it demonstrates is that NJ Audubon has received financial support in writing these logging plans. These contracts do not include the funding they also receive from USDA grants.

While we are ok with funding we are NOT ok with the removal and sale of a public trust resource-public timber! Our public lands are for all NJ residents and left intact are our best carbon defense. Now you see too, why there are those groups supporting these plans.

As you heard on Friday, NJ can do management on public lands by using the International Ecological standards like "SER" and follow TRUE science like what Sharon and Leslie were discussing. They will be sending further info any day now and please keep us in the loop with your findings.

We are committed and passionate about following the peer reviewed science, to do no harm, and to protect NJ's public forests for climate change resilience and for our future. We hope you can help bring these issues to light in the Senate Environment Committee and to the NJ legislature. We are looking forward to our continued collaboration.

Really appreciate your time and thanks so much,
Silvia Solaun
NJ Forest Watch

408x

NJ Forest Watch Comments to Senate and Assembly Environment Committees on the NJ Forestry Task Force

The NJ Forest Task Force commissioned by Senator Bob Smith (Chair of the Senate Environment and Energy Committee) is about to produce its final report and present to a joint legislative session on Feb. 22. Members of the legislature as well as the public and press need to understand how the task force arrived at its recommendations and the science behind them in order to properly evaluate them.

In forming the task force Senator Smith stated: *"Forests are critical to the environmental welfare of our State. They can play a major role in mitigating climate change by sequestering carbon dioxide; providing habitats for endangered wildlife; helping clean and protect drinking water sources; and stabilizing soils. Proper management of forests is also necessary for preventing wildfires which are becoming more frequent and intense."*¹

The purpose of the task force was *"to study and identify ways in which the State can best manage its forests in order to fight climate change, prevent forest fires, improve ecosystems, and protect soil and water quality."*² The focus of the task force was on public forests.

A major impetus for creating the task force appeared to be the ongoing mechanized, commercial style logging (clearcutting) on Sparta Mountain of 10+ acres per year since 2011, being conducted by the NJDEP in partnership with the NJ Audubon Society. To date, approximately 110 acres have been essentially clearcut on Sparta Mountain and the formal task force recommendation is, unfortunately, to continue this program. To be clear, this is a NJ State sponsored, completely optional, program to cut down public forests owned by the taxpayers and allow private companies to profit from the operations and the sale of the wood. As described below, the scientific arguments for this program are weak and very misleading and ignore many harms to forest inhabitants, climate and forest ecology.

The task force leaders set two key objectives: 1) develop a process to reach consensus where it was possible and 2) base all recommendations on peer-reviewed science. Consensus was defined as having about 95% of participants in agreement on a topic. Only policies with consensus support were to become recommendations. The remainder were to be passed back to Senator Smith for his decision. Proposals backed by peer-reviewed science findings were solicited from participants. Participants created over 75 proposals but only 40 were discussed.

The task force leaders sent out guidelines stating:

- Actively create space for the voices of all
- Be open to other perspectives, opinions and ideas

But, as demonstrated below, they failed to follow their own guidelines.

Midway through the process it was apparent that the proposal/discussion process had failed as no one had changed their positions and the task force leaders were unable to show consensus on any topic. The reason no one had changed their positions was because there was no pressure or reward to do so. The leaders kept asking us to think about where we could reach consensus, while participants were focused on issues. In addition, the team leaders stated that the science was too deep and complex and the task force did not have the resources to properly evaluate it. (This statement was made by Tom Gilbert on September 23, 2022 at the 1:39:00 point in the meeting). Anjuli Ramos added the idea that since climate is changing we don't want to make specific scientific prescriptions that might not be appropriate in 10 or 20 years as an excuse to leave the science to the NJDEP. Unfortunately, the NJDEP has become a captive agency and aggressively supports logging as good for the environment, with no peer-reviewed science to support this assertion. This approach is clearly not consistent with the entire IPCC (Intergovernmental Panel on Climate Change) approach to fighting climate change. As one can see from the Framework recommendations **there were no substantive recommendations to fight climate change.**

At that point, the leaders changed tactics and asked for a list of any topics on which we might be able to find consensus. This started a less than totally transparent process. First, the random list was aggregated by the leaders into a monolithic all-or-nothing package of elements called the Framework. The Framework does not need to be a bundle of positions. The elements have no inherent interconnected value and each should be allowed to stand or fall on its own. Instead, participants were asked to vote on accepting or rejecting it in total. By accepting it in total we are forced to accept the bad with the good. Participants were urged by the task force leaders to support the entire Framework even if they disagreed with portions of it. However, this was not enough bias for the task force leaders. In response to a participant's request for additional time to fill out the final survey response, the task force leaders responded by saying, **"We understand that there are groups who are pressuring participants to not support the framework."** This was completely false as we have offered our analyses of the survey topics and told our members and allies how we were voting, but we always made it clear that they were free to vote as best met their positions and needs. As one participant wrote to the task force leaders, "It was you, who after stacking the Framework with your own preferred topics and language then pushed us to support the whole thing even if there are parts we strongly oppose. Therefore, one could say it is

you who are pressuring respondents. Since you state this is happening, is this what you are telling Senator Smith? Are you implying to him that the reason there is no consensus on the Framework is because some groups are pressuring members to oppose it? Are you implying that our votes are based on something other than science?"

There were several rounds of votes in November and December (and participants were then also able to vote on individual topics), but the leaders never produced a quantitative report on the support for any elements or the total package. In the last iteration of the Framework, all the previously labeled "elements," suddenly became "Recommendations," and now form the basis of the task force output. The final report from the task force makes no mention of the 95% agreement needed for consensus and now presents agreement levels of 65% as satisfactory. Moreover, despite three surveys with quantitative questions on the support/opposition on each recommendation, none of those detailed quantitative results on each recommendation were ever provided to the participants and there was no inclusion of such results in the final task force report and no explanation for their absence. We think the members of the legislature deserve to see this information in order to evaluate all of these recommendations. There has been no explanation as to why this level of detail has not been released. As of this date, there has been no report demonstrating consensus on individual elements in the Framework (based on the task force definition of consensus) or the overall document itself, yet it is described by the leaders as *"ideas that enjoy broad agreement among diverse Task Force participants."*

Among the many issues uncovered by the task force is the fact that there are **no state policies codified by statute for management of NJ public forests adopted pursuant to the Administrative Procedure Act. There are also no formal DEP rules and regulations for this purpose.** The NJDEP along with partners like NJAS are making public policy with no authorization, very little public input and virtually no oversight.

There were many biases and concerns with the task force process. In addition to the abdication of the original rules to base all recommendations on science and to use a 95% threshold for consensus, there were the following issues.

- A request for transparency was made, "to ensure the output of the task force meets the highest standards and best practices for transparency, credibility and impartiality," by having participants identify if they or their institutions or organizations receive any funding from entities such as USDA and NJDEP that support logging. This request was completely ignored by the task force leaders. As one participant stated, "Several vocal participants of the NJFTF made it clear

that they benefit financially -- personally and professionally -- from removing material from forests that belong to us taxpayers. At no point did these participants make formal disclosures of their conflict of interest. I also learned that New Jersey Audubon gets paid handsomely -- like a private consulting firm would -- for tagging trees for removal (and other work); yet NJA made zero disclosure of the revenue it makes from removing materials from our public forests. This is one example of the conflict of interest evident during the NJFTF process." Therefore, the odor of such biases permeated the process and still colors the recommendations.

- The NJDEP was invited by the task force leaders to give two presentations, which turned out to be highly biased towards the status quo policy of allowing logging on public land and lacked scientific support. In the opinion of a number of task force participants the task force leaders failed to follow their own guidelines and appeared to be "in the tank," with the pro-logging crowd. When a few people expressed this same sense at the end of one of these presentations, Eileen Murphy justified this with the explanation that "the DEP will have to implement the policies from the task force." It was never made clear how a presentation on current policies was needed in order to help the DEP implement anything. This irrelevant statement only further demonstrated the bias in allowing the DEP to give unnecessary presentations. In addition, the inability of the presentation Q&A process to challenge any of the DEP statements added to this sense of bias on the part of the taskforce leadership.
- The DEP argued that local logging is good because it saves GHG emissions from importing and transporting wood products and since there is a demand for wood products that must be fulfilled, this reduces global GHGs. This is a forestry industry talking point to support logging and has many issues such as the use of public forests for this purpose, the questionable efficiency of logging NJ forests vs. plantations, the violation of the NJ GWRA and the feasibility of enforcing such a policy. The DEP presenter also spoke about storing carbon in wood products with no mention of the amount of carbon that is released into the atmosphere by the logging needed to acquire the wood. Every study we have seen talks about at least 40% or more of the logged wood having its carbon immediately released back to the atmosphere. We cited a study in Oregon showing this percentage was 81%. The DEP presenter somehow decided that Oregon was in a developing country and the statistic was not applicable. Another DEP argument that wood used to replace steel and concrete in buildings generates less carbon emissions, was also debunked.³ These arguments were presented with no countervailing presentation such as one on proforestation. These were presented as factual with no real debate. We responded to the task force leaders with a letter from 200 scientists arguing against logging because it

releases so much carbon and, in particular, it destroys the argument that this is acceptable because it stores some carbon in wood products. There was no response from the task force leaders. Overall, the level of scientific support from the DEP for its policies was essentially zero and was not a good example of the task force principles.

- It was also pointed out by participants (see issue on transparency above) that the presenters were from the divisions of DEP who benefit from funding from federal agencies such as USDA.
- After the highly biased DEP presentations, participants asked for a presentation on **proforestation**, the practice, supported by many of us, that **protects existing natural forests to foster continuous growth, carbon accumulation, and structural complexity, while also supporting active ecological restoration such as removal of invasive species and control of harmful animals such as deer**. The task force leaders agreed but instead of simply allowing proponents of proforestation to speak, including Dr. Moomaw, the Nobel winning “father of proforestation,” they added two more pro-logging speakers. These were foresters (i.e., their livelihood is based to a degree on funding from the USDA) who are committed to “active management (aka logging),” including the creation of early-successional habitat, which is the purported purpose of the yearly logging on Sparta Mountain. This was clearly a very biased approach in order to ensure the participants always heard the arguments of the pro-logging task force leaders. As one participant wrote to the task force leaders, “You somehow felt compelled to rebut everything you thought he [Dr. Moomaw] might say by putting forestry industry advocates on a panel with him. This was the third presentation to this task force that had a major focus on harvest of wood products from forests even though participants like me had asked for a presentation devoted to forest ecology as an alternative to all the programming provided to us on forestry.”
- Requests to discuss these bias issues with the task force leaders went unanswered.

While there are a number of good recommendations in the Framework there are also bad recommendations. Most egregious is the late inclusion in the Framework – long after task force meetings had ended and, therefore, without any discussion amongst the participants – of Recommendation 15 which states:

The NJDEP should not include commercial profit as a goal in any forest management plan* on public land. Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.

**includes Ecological Restoration Plans, Natural Resource Stewardship Plans or other plans on public forested lands*

Make no mistake - this benign sounding statement (Wood products can be sold...) **means mechanized logging on a significant scale.** There is no other way to obtain wood products. The justification for such logging includes ecological health and addressing climate change. As described below, neither purpose has any scientific basis. And the approved plan process allows the proponent to only cite one objective **without any consideration of the multiple harms it will inflict on the forest and climate.**

This packages a good recommendation (disallowing commercial logging) with a very bad recommendation (allowing the sale of wood products from approved logging plans for private gain). This packaging made it impossible for many participants to approve of disallowing commercial logging because the recommendation includes the continuation of the DEP status quo logging program, justified through false and misleading claims, as seen on Sparta Mountain. Moreover, the opposition to this DEP program appeared to be a major factor in creating the task force, but has now been manipulated, without consensus support, to instead be a recommendation.

Below is a list of problems with the task force including the arguments used to justify the current and future logging program, the lack of data behind recommendations and omissions from the recommendations.

- No substantive actions were recommended to fight climate change – the first item on Senator Smith's list of goals. It never acknowledges that logging impacts carbon storage and sequestration but talks instead about active management (logging) for carbon defense - a provably false DEP position. In fact one task force leader wrote, "I DON'T BELIEVE THAT HOLDING THE CARBON IN NJ IS HAVING ANY REAL NET EFFECT ON OUR GLOBAL CARBON FOOTPRINT".
- Recommendation 15, cited above, does imply that an approved plan to create wood products (aka logging) could have climate goals. However, during the task force meetings **no peer-reviewed science was presented to support this position**. Instead there were at least a dozen peer-reviewed papers and other summary articles that clearly demonstrated just the opposite; that logging harms the climate by increasing CO2 emissions and decreases carbon sequestration. If the task force leaders want to keep this assertion they must produce the science to support it. Otherwise, the insertion of climate as a potential benefit from logging in recommendation 15 is simply gratuitous.
- Recommendations were not based on any quantification of the existing or necessary increase in carbon sequestration called for in the Global Warming Response Act 2020 Report. There were no estimates of carbon storage and

sequestration from public forests, no estimates of the amounts lost to logging and no estimates of the amounts that could be achieved through proforestation. The Framework states, "Carbon reserves should be defined similar to 'ecological reserves' in the Natural Areas Program as areas managed to allow natural processes to proceed with little or no habitat manipulation." This is basically saying we should set aside certain areas for carbon reserves, but not our entire public forest area. But as stated above, the task force participants have no idea as to the volume of carbon sequestration needed from public lands and thus this is a meaningless recommendation. **Deciding on management techniques before understanding the goal is putting the cart before the horse.** Even worse, the same section describing carbon reserves goes on to say, "with the exception that management will occur only to address ecological or safety threats, as approved by an oversight council." meaning these areas could still be logged.

- It ignores many studies on carbon. These showed that carbon sequestration is a function of leaf volume, not age, (with trees increasing or holding steady on sequestration for hundreds of years), **maturing and mature forests store and sequestering more carbon than young forests** (which are net emitters of carbon for their first two decades) and the importance of leaving cut wood on the ground to return its carbon to the soil
- Recommendation 15 **undercuts efforts to fight climate change** by increasing carbon emissions from tree cutting and removal and reducing future sequestration.. We would, in fact, agree with this recommendation if it was restated as: **Commercial timber management should never be the goal for any forest restoration plan on public land. Where trees are cut as part of an ecological restoration plan conforming to the Guidelines of the Society for Ecological restoration, the wood and forest products should be retained on site to maximize carbon storage and soil formation.** However, we were never given the chance to discuss this as the recommendation 15 was created after the task force had ended.
- **The framework fails to recognize that maximizing carbon through proforestation also addresses many ecological issues and protects water, soil and other values of public forests such as conservation and recreation.** It sets up carbon protection as separate from those other benefits and argues for other techniques to address those issues, which creates a false dichotomy as to beneficial management actions. This is due to the lack of analysis of the science on the part of the task force.
- Despite acknowledging the open question of DEP legal authority to set policy for public forests and lack of regulations, the task force specifically recommended

that existing plans continue to be implemented. The justification for continuing these ongoing illegal actions was simply, "because we say so."

- The Framework uses vague and ambiguous terms (such as "active management" and "adaptive management") that are often code phrases for logging. It must be much more specific to be useful and trusted.
- The existing process to develop approved plans that the Framework supports have many weaknesses. Among the worst is that there is no required evaluation of all harms and benefits. The current plan for Sparta only describes the benefits for a few songbirds, most of which are not endangered. It omits evaluation of harms to climate from increased CO2 emissions and reductions in sequestration; harms to the soil and vernal pools from mechanized logging; harms to most bird species, especially interior species requiring intact canopies (including nesting hawks and owls - which were observed and reported at Sparta just before logging), harms to habitat for many animals such as amphibians (salamanders), bobcats and bears, the essential network of mycorrhizal fungi - required for healthy forests and harms to water supplies. None of these considerations appear in the final Framework recommendations.
- Arguments for the need to increase habitat for certain bird species through logging have been debunked⁴. There is no need to cut forests to save these songbirds as there is no need to create new young forest habitat as described in the Kellet paper (see reference in footnote). Not only do we have plenty of young forest (YF) but the level of YF is only lower compared to a very recent baseline, generally dating to the 1960s or later. There is no need to increase the populations of YF birds as historically (prior to the 1960's) they were even lower than we have now. There is little acknowledgement that, although these species are truly declining, they were artificially elevated in their abundance by colonial and relatively modern land-use practices that were abandoned in the 19th and especially the 20th century.
- There was no consideration of any standards for ecological restoration
- There was no review of the scientifically proven ecological benefits of leaving cut wood on the ground to allow its carbon to be sequestered and the absence of need to remove wood for virtually any ecological purpose
- There was no willingness to recognize the scientific basis of proforestation forest management in the Framework. In fact, the framework fails to even mention it despite about 80% of the task force members voting in favor of adopting it as a management policy.
- There were no recommendations on protecting soil and water quality
- There was no discussion of the often-stated need for a moratorium on logging, until regulations are written. When asked to vote on this, the response from one of the task force leaders was, "I personally don't believe that it is beyond the

purview of the Task Force to consider the issue of a moratorium. However, I think it is pretty clear that it is not a proposal that has consensus or close to it. At present we are seeking to find items that have broad agreement.” However, many votes were taken on other issues to determine the level of support/opposition - but not this topic.

- The Framework calls for study, work and funding that will, at best, take many years to accomplish, if ever, with **no intermediate solution** such as a moratorium/suspension of all FSPs until such time as rules have been not only written but also adopted. A moratorium would ensure an immediate climate response as well as foreclosing no future options. It provides incentive to get the rules and regulations done. The status quo allows unrestricted cutting and is unacceptable as a Task Force outcome. A moratorium would allow more participants to support more of the recommendations because it would stop the immediate harms.
- There was little effort to examine the financial issues associated with existing logging programs in NJ. When participants asked questions on this the answer was to ask the DEP for information, rather than use the authority of the task force to obtain it.
- While recommending that “commercial timber management should not be a goal for any forest management plan on public land,” it is well known that the public land logging program sponsored by the NJDEP and NJAS provides income for private organizations including NJAS and loggers who are paid by the DEP to perform the logging and then are allowed to sell the wood for additional profit. Therefore, while purporting to ban commercial logging, recommendation 15 still allows private entities to profit from land purchased by the public.
- Task force discussions were simply allowing people a few minutes to speak, as selected by the leaders. With close to 100 attendees at each meeting these always ended with people in queue, unable to express their opinions. There were no formal debates which would have required more organized presentations and clear opportunities for rebuttals. There was only one subcommittee created despite the many contentious issues. Given the size of the task the “discussion” approach was not satisfactory for many. As stated by one participant, “most concerning was their curtailing questions and avoiding, in effect, tabling any comprehensive consideration of the key issue of ongoing logging of state owned lands resulting in destruction of our remaining old and mature forests, the soil and water on which they thrive and return to all life, vs. pro-forestation as advocated by Leslie Sauer, Sarah Webb, and others, and advanced regeneration by Jay Kelly and Emile DeVito that support and enhance forests, soil, water and flora and fauna.”
- There was no effort on the part of the leaders to construct a balanced position document and support negotiation among the different parties (as is done with a labor/management negotiation or a peace treaty negotiation). There was no

negotiation on anything. The only “negotiations” were among the four task force leaders as they reworded the Framework to meet their needs. As evidence is the above mentioned insertion of Recommendation 15 after the task force meeting had ended, and therefore without any discussion among the participants.

- A revolutionary proposal that demonstrates there is no science-based need to remove wood from the forest for virtually any ecological benefit, was introduced late in the process. Despite specific requests to discuss this because it addresses a most fundamental aspect of the logging debate, this request was ignored.
- There were many issues with the voting process as this was ambiguous and changed several times during the course of the task force. In response to many complaints about the task force voting process which determined the quantitative support/opposition for all recommendations, Tom Gilbert responded, “I do think it is time for everyone to stop worrying about the process, which won't be perfect no matter what, and talk about the issues.” Unfortunately, the process controlled how we got to talk about the issues and how the support for them would be presented. This was not a minor background issue. When another controversy arose over allocation of votes to organizations, Tom Gilbert wrote, “I know that you won't be happy with this, but we've got to create rules and stick by them.” This was after many changes to the rules.
- In early September 2022 the task force participant lists were removed from the shared google drive. The excuse from the task force was that these were out of date. Instead of updating them they were just removed and never replaced. Previously, the lists were posted with the guidance that participants should reach out to each other to work on issues.

In summary, **the task force process was highly biased in favor of logging, produced no provable consensus, has not followed the science and recommends the status quo on logging public forests for private gain despite its overwhelmingly negative impacts on our forests.** NJ residents have not paid to preserve their forests in order to generate profit for private entities. As one task force participant wrote to the leaders, “Throughout this entire process you did not act as impartial facilitators whose job was to find ways to bring different parties together and provide them the tools to let them come to consensus on their own. Instead, time and again, you pushed your own organizations’ agendas on us with biased presentations, ignoring proposals that we asked to discuss, packaging of topics into one take-it-or-leave-it framework and ignoring the many topics we wanted to have included, not to mention taking several surveys but never revealing the quantified results and never using the long-discussed consensus process you developed. Your use of your own

organizations' logos on these documents further demonstrates your willingness to use the weight of your organizations to produce your desired results, especially since three of you are in favor of logging and the fourth is now willing to go along with it for political reasons. At the end, the only negotiation that took place was amongst the four of you (not authorized by participants) because you never gave us a process that enabled us to negotiate.

Silvia Solaun, Executive Director, New Jersey Forest Watch

Ken Dolsky, Vice President, New Jersey Forest Watch

Katherine Evans, Secretary, New Jersey Forest Watch

¹ <https://www.insidernj.com/press-release/smith-announces-formation-forest-stewardship-task-force/>

² <https://www.insidernj.com/press-release/smith-announces-formation-forest-stewardship-task-force/>

³ Mark E Harmon 2019 Environ. Res. Lett. 14 065008,
<https://iopscience.iop.org/article/10.1088/1748-9326/ab28bb/pdf>

⁴ Kellett, M. J., Maloof, J. E., Masino, S. A., Frelich, L. E., Faison, E. K., Brosi, S. L., and Foster, D. R. (2023). **Forest-clearing to create early-successional habitats: Questionable benefits, significant costs.** Front. For. Glob. Change. <https://doi.org/10.3389/ffgc.2022.1073677>

I am a member of the NJ Forestry Task Force and I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

I also oppose it because they did not allow the people in the group to even express their feelings or concerns. When you attempted to talk about what they said, they cited information from people outside NJ. Almost all their speakers were from outside NJ. They didn't understand anything about NJ. They didn't listen to their members. There was an agenda from the beginning that didn't represent anyone except a small group and their opinions.

Wood from state forests should not be sold because it encourages and incentives cutting down and removing trees on our public lands.

The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely yours,
Cynthia Soroka-Dunn

420x

March 1, 2023

From: Dorothea Stillinger

Representing the Great Swamp Watershed Association www.greatswamp.org

To: Senator Bob Smith and members of the Senate Environment and Energy Committee and
Assembly Environment and Solid Waste Committee

Subj: Request a moratorium on tree cutting in public forests and wildlife management areas,
even under approved plans, until new rules are in place

Remarks:

The New Jersey Forest Task Force recently completed a herculean project to recommend items for legislative action to preserve New Jersey's public forests. The Great Swamp Watershed Association was honored to be part of the Task Force and we attended all but about 4 of the two hour bi-weekly meetings of both the ecological and climate workshops over ten months.

No consensus was reached by the end of the NJFTF meetings because about a third of the groups participating were not able to support all the recommendations. Most of those groups were concerned about logging based on scientifically unsubstantiated claims of ecological benefits.

GSWA agrees that logging mature trees, especially in interior patches of contiguous old growth forest, needs more study. For that reason the Watershed Association urges you to support a moratorium on tree cutting and wood removal in public forests and wildlife management areas, even under approved plans, until rigorous studies have been performed and new rules based on those studies have been implemented.

Thank you for considering these remarks.

Dorothea Stillinger

Member, Board of Trustees of the Great Swamp Watershed Association Chair of the GSWA Land Preservation and Advocacy Committee dkstillinger@gmail.com www.greatswamp.org

421x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.



VOTERS FOR
ANIMAL RIGHTS

ALLIE TAYLOR
President



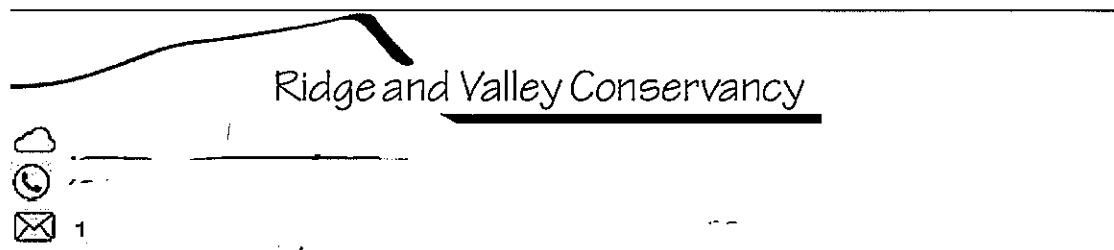
422x

Attention: N.J. Senate Environment and Energy Committee and Assembly
Environment and Solid Waste Committee.

I have attached Ridge and Valley Conservancy's comments on the Forestry Task
Force report, which were presented at the hearing on February 22.

Best,

Susi Tilley
Executive Director



The accreditation seal is awarded
to land trusts meeting the highest
national standards for excellence
and conservation permanence.

423x

Dear Senate Environmental Committee members,

I am the chair of the Madison Environmental Commission and am writing to express my opposition to NJ Forest Task Force recommendations for logging to create so-called young forests.

The governor has strong climate recommendations in place. The proposed tree loss will gut their effectiveness, accelerate climate change and irreparably harm NJ's forests. Logging to create forests allows edge, invasive species to spread and tragically diminishes the habitat for wildlife.

I realize that flowers and sunlight dependent species are critical for birds, but this is not the way to nurture them. Trees are huge pollinator supporters (pardon the pun). One oak tree supports 513 species of butterfly and moth caterpillars. These caterpillars are the food that birds depend on. Climate shifts and losses have been modeled and mapped for native tree species by the US Forest Service and The Nature Conservancy, showing northern NJ to be a critical corridor for preventing extinctions.

If you follow the money, these recommendations smack of industry pull and do not account for the goals of proforestration and Ecological Restoration, which consider the primary ecological components of the forest: water resource production and storage; biodiversity; soil complexity; compatible human recreation; and carbon capture and storage, to be of equal importance.

Sincerely,

Claire Whitcomb
Madison NJ Environmental Commission, Chair

424x

Have drones to survey our forest to keep invalid off road vehicles out of the forest and be able to confiscate the vehicles and fine them 1000 dollars for first offense and 10000 dollars for subsequent offenses.

Also find a way to control the deer and invasive species.

Lee Widman
Ventnor Green Team

425x

Dear Honorable Senator Smith, Assembly persons, and Congress persons,

I am a member of the New Jersey Forest Task Force (NJFTF). My credentials are that I have a background in science with a Masters Degree in Aerospace Engineering. I know how to read and understand scientific papers to evaluate them: Do they follow scientific method? Does the data collected support their conclusions? Can their conclusions be applicable to the situations in New Jersey's forests, based on similar conditions, or are the conditions too diverse to draw that type of assumption?

I also have lived in the Highlands Forest for 23 years. So my learned experiences and opinions based on those experiences are similar to the public in general who live in the forested areas of the Highlands. Therefore I think my opinions are representative of the residential stakeholders.

I oppose the Framework submitted by Co-Chairs, for the reason that they have tried to manipulate the members of the Task Force into accepting the status quo when it comes to forest management. On the Zoom meetings dated June 6, 7, 20 & 21, 2022 the ground rules were laid out on how the process would work:

NJFTF members would write proposals relative to forest health or climate and submit them for review by the Co-Chairs. It was a requirement that the proposals must be science based. No proposal based on opinion would be accepted. It was originally required that the proposals must not cost NJ State any money because NJS had no money to spare. That was soon changed to say that the proposals CAN cost the state money, provided that the proposal included a source for the funding. The Co-Chairs were supposed to read all the proposals. If there was a problem such as not enough scientific references, then the Co-Chairs were supposed to return the proposals to us with a list of the deficiencies that we were to fix and resubmit.

That never happened. Mid-way through the process, the Co-Chairs completely changed all the rules on us. They rejected our proposals and instead decided to write their "Framework" which resembled the status quo within NJDEP Forest Management as it exists today. They would only allow us to fill in minor details to their chosen Framework.

I for one, spent months researching invasives, to write my two proposals on invasives. I spent weeks researching deer management. I found scientific papers, and collected past and present data of deer populations throughout NJ, to write my two proposals on deer management. I spent weeks researching hazardous oil trains known as "bomb trains" to learn the science behind the flammability of the oil, and the rupture-ability of the tankers that transport it. I relearned my Thermodynamics that I studied back in my college days, just so that I could present a scientific argument against the "bomb trains".

After all that hard work, the Co-Chairs only accepted my two proposals on deer management. The Co-Chairs gave me no reason for rejecting my other three proposals. Without a reason, there was no opportunity for me to correct whatever it was that they

didn't like. They wasted my valuable time because they chose not to stick to the rules that were laid out for us.

I assume they didn't want to accept my proposal on oil bomb trains because it is not something that exists in the status quo of forest management today. They may assume that there are no trains going through the most dense forests now. But there are trains going through forests right here in the Highlands. They can be converted to oil-bomb-trains at anytime. The disaster caused by the rupture of the chemical trains in East Palestine, Ohio, should be a warning to everyone in the United States. If a terrible spill can threaten lives in Ohio, then imagine what an intense explosion and fire caused by an oil-bomb-train can do to a state as densely populated as NJ. My proposal should not have been rejected for no good reason other than the Co-Chairs had never seen this issue come up before.

I mentioned that my two proposal on deer management were accepted by the Co-Chairs. There was a day when the Co-Chairs decided all deer management proposals would be read and discussed. Mine, that were good enough to be accepted, were excluded from the discussion. All the others were read and discussed. I assume this was a personal slight. I had told the Co-Chairs often, that I objected to their change of the rules mid-stream. Excluding my two deer proposals from the discussion may have been their way of shutting me out of the group, because I dared to object to the change of process.

One proposal that I had on invasives, was to re-establish the Invasive Species Council. I gave scientific papers and collected data on why this was important. Later, Senator Smith actually did get the Council re-established. This proves that my instincts and research regarding what is important is spot-on! So why was that particular proposal of mine rejected, or not-accepted?

Many of us on the NJFTF worked so hard on our proposals, only to have them ignored and replaced by the "Framework" invented by the Co-Chairs to mimic existing forest management policies. I hope the legislators will take some time to read the proposals that we worked so hard on.

Most of the people on the NJFTF worked hard to prove that a moratorium on logging was required. They presented their science in several proposals that were discussed. After reading their scientific papers, I agreed with them. Their arguments in favor of a ban on logging are science based. These proposals were voted on. The Forest Watch Group said that 85% of the NJFTF supported a moratorium on logging until the NJDEP could study CO2 sequestration and issue new rules. But the Co-Chairs said that 15% descent was too much. They wouldn't accept the logging moratorium because the Co-Chairs said they required 94% approval as the threshold for consensus.

Later on, one of the Co-Chairs said that it was not within their power to ask for a moratorium. I thought to myself, "What is she talking about?" It was her duty to report to Senator all the proposals that the NJFTF came up with, whether there was consensus or not. The legislators are the ones who will decide whether or not to vote on the proposals

as new Forest Management legislation. It is not the place of the Co-Chairs to make those decisions on behalf of the Legislators.

Another day we challenged to Co-Chairs to bring the bring back the proposals and let us vote on them. The Co-Chairs refused. One of them said, the science was too complex for them to understand. So they could not decide which proposals were based on sound science and which weren't. That is why they went with the Framework of the status-quo management practices instead of our scientific proposals. I was SHOCKED. What could I say? The NJFTF worked so hard to learn the science and present it. But the Co-Chairs couldn't be bothered to do the same to evaluate it. Why did you assign people who are not trained in Scientific Method, to oversee a project designed to come up with proposals based on Science? The Co-Chair who made the statement admitted to being unqualified to do this job.

I object to the following status quo items in Forest Management based on the scientific research that was done by the NJFTF:

- 1) There must be a moratorium on logging, cutting down trees, and removing trees from the forest until the scientists can evaluate the best way to use the forest to sequester Carbon.
- 2) The scientists that decide forest management rules must include a meteorologist who can knows how to predict changes and effects of global warming on both today's weather patterns and the weather patterns of the future. This scientist must be able to help the ecologists evaluate which species will move into the area and which must move out because it is not practical for them to survive here anymore. We cannot go back and undo the damage we have done. We must be able to admit that the Golden Warbler may no longer be acclimatized to live in New Jersey with it's new changing eco-system.
- 3) NJDEP should no longer allow fossil fuel projects to come into New Jersey. Fossil Fuels are the technology of the past. Wind towers, solar panels, storage batteries, and geo-thermal heating and cooling are the future. Tidal power can be an energy source especially with the large amount of coastline that NJ has.
- 4) A 10 year educational program about invasives should start in our mid-schools now. 10 years from now, these students will grow up, buy houses, and voluntarily remove invasives from all their properties to upgrade the value of their homes and properties. They will plant redilient natives in place of the invasives. But this will only happen if you start educating them in middle-school Earth Science classes now. The physical labor of the public must be harnessed if we are to beat the spread of invasives.
- 5) Using Fire as a tool in Forest Management is not a well researched fact for deciduous forests. A moratorium on using prescribed burns should be put into effect, except in high risk areas, For example the Methane Gas Plant that is being build in West Milford is a high risk area. The property around this plant should be managed. Several communities may want to be protected. So management around homes should be investigated first.

Burning the interior of deciduous forests may not make sense. This needs to be studied more.

6) Using fire management around communities in the Pinelands makes more sense. But, burning the interior of the Pinelands does not make as much sense. Statistics show that FAR MORE trees are burnt down in the Pinelands by Prescribed Burns, than are ever burnt by natural fires. This is not California with 1000 year droughts. Our droughts only last one season. The scientific paper that was written to study California's drought area does not apply to NJ. More study needs to be done.

7) The people of West Milford do not want to increase the number of predators in it's forests. We already live in fear of the bears (that killed Mr. Patel one or two miles from my house in Apshawa Park), caution of coyotes that I hear howling at dusk every night, and respect for the rare Bobcats that I have seen twice on my property. Do not make us suffer any more than we already have. Try putting the predators in the suburbs of those who requested them, and let's see how they like it there.

I will contact (email) the legislatures in the future to further discuss the issues regarding forest management. I don't want all the work I did to go to waste.

Thank you all for all your work do every day!

Best Regards,

Margaret Wood

429x

To whom it may concern,

As a concerned New Jersey resident, I oppose the NJ Forestry Task Force Report. This is bad for our forests and bad for the wildlife. Deers are not the culprit for destroying the forests. The destruction is made by mankind.

Respectfully,

Nushin Amirhosseini

Sent from my iPhone

430x

Hello,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you,

Danielle Amodeo

431x

I absolutely OPPOSE the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Stop trying to control nature! I am watching the tear-down/build up mentality of the massive building in NJ. Work on that if you feel the need for a task force. The trust between constituents and government is bad and getting worse, this is an example of why.

Marie Ansari

432x

This dangerous report will very likely be used to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer. So the report should be opposed.

The report is extremely biased against wildlife. It demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation - which is ridiculous - when scientists have found that insects and invasive jumping worms have caused far more forest damage.

Wood from state forests should never be sold, and the report proposes allowing the sale of wood under certain circumstances. It's a terrible idea because the thought of making money will only be an incentive to cut down and remove trees. There's never a need to cut down and remove trees in our state forests.

Promoting the donation of deer meat to food pantries is another awful idea. It's not good for anyone, and is nothing more than a PR stunt to make hunting more acceptable and "not so bad". Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ.

Hunters and non-hunters alike oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

Too much discretion is left to a "science advisory panel." We know that industry scientists do not and will not care about the welfare of the animals involved animals and will support more timber sales further destroying wild habitats.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Please reject this Report and all the horrible implications that will go along with it if approved. NJ can do a lot better than this. Let's protect wildlife and stop making them the enemy.

Sincerely,

Mr. & Mrs. David (Debra) Ashton

433x

Dear NJ Senate Environment Committee member,

I write to express my strong opposition to the New Jersey Forestry Task Force Report proposals, which do a number of things which are detrimental for forests and wildlife.

I strongly object to the use of consumption as a means to conservation (it never makes sense), and question the objectivity of any panel labeled 'science advisory panel' that includes industry representatives among its members. If you open wood sales in our public forests, the function of those forests will be forever changed. The pressure to consume will be built in and grow when this function is added to their reason for existence. Where is real-estate development and land-use policy addressed in the proposal? Is there a sustainable approach towards invasive insect management? These are factors more significant in the decline of forests than the native species targeted. If you must target deer specifically, have you included non-lethal methods of control, including birth control, sterilization, exclusion and other methods known to reduce populations. We go to the same modes of violence as if science were involved and end up with more deer than less.

The reckless proposal to promote donation of deer flesh to food pantries , ignoring basic public health and safety, shows the influence of a shrinking population of hunters who are using their undue influence in NJDEP Fish and Wildlife to promote a practice most New Jersey residents don't value or identify with. This is not science-based. It is recreational violence being justified with a proposal based on irrational risks to public health. This proposal doesn't even have broad support among these hunting constituencies. It is reckless.

The report is a doling out of what natural forest resources we have left in this state for the benefit of a small group of special interest communities. It is unacceptable. Please stop this policy from moving forward.

Sincerely,
Eric Baratta

434x

Hello,

I oppose the NJ Forestry Task Force. It's bad news for New Jersey's forests and a report used by Senator Bob Smith to craft legislation to cast a dark shadow on NJ and its deer population, in particular. It contains a one-sided opinion, morelike, to favor certain people that would NOT help New Jersey, NJ forests, the environment of NJ or people who truly care about any of the above.

Thank you. If you would consider my words, I am concerned about our state of New Jersey. I question why Senator Smith would think the "NJ Forestry Task Force" would benefit our state and our deer.

Sherrill Barbary

435x

I oppose the **NJ Forestry Task Force Report** for the following reasons—

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. Deer are a big part of New Jersey's wildlife enjoyed by a large percentage of residents who should have a say in their oversight.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat. Deer in New Jersey are afflicted with Chronic Wasting Disease as well as COVID. It's unconscionable to expect those who depend on food pantries to eat it.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests. The forests belong to New Jersey residents and it should never be sold without our consent.
- **Too much discretion is left to a "science advisory panel."** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats. Who are the members of this panel and what are their affiliations? Their decisions are not legal and should be subject to oversight by impartial animal welfare experts.
- **Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored. And comments on the NJ Forestry Task Force Report will be ignored no doubt.

Seeking public comment is a pretense because comments are ignored if they don't agree with a plans already put in place.

- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land. It's outrageous. New Jersey wildlife is enjoyed by all NJ residents and its slaughter and even sale! by a few is an abomination and should be illegal.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Diana Barker

**I STRONGLY OPPOSE THE NJ FORESTRY TASK FORCE REPORT BECAUSE IT IS BAD
FOR WILDLIFE AND BAD FOR FORESTS!**

Cindy Bartman

438x

I was a very consistent participant in the NJ Forest Task Force in 2022.

Some of the Task Force chairs' recommendations have merit.

BUT I believe the Task Force chairs' report failed New Jersey by doing little (if anything) to prevent profiteers from bulldozing portions of NJ's precious publicly-owned forests. Even worse, accelerated NJ forest destruction could result from fully implementing the chairs' report by systematizing forest destruction processes that have thus-far operated clumsily and in the shadows. The real problem is that the Task Force report's language on mitigating logging is too fuzzy and full of loopholes. Equally bad, profiteers on the Task Force completely ignored vast areas of science showing that tree removal from forests is deeply harmful:

- They ignore the destruction of soil structure and composition in their heavy-handed "stewardship" projects.
- They ignore the destruction of extremely diverse animal, plant and fungi habitat, and the loss of overall biodiversity as they pursue preservation of one or two species.
- They ignore the loss of carbon sequestration, clean water protection, clean air production.
- They ignore the erosion and wildlife deaths caused during their destructive work.
- They ignore the areas outside of NJ's forests that can be stewarded as "young forest" without destroying our existing maturing taxpayer-owned forest.
- They ignore the harm of 10x overabundant deer and invasive species that infiltrate forest clearings that the loggers create.
- They ignore the large body of recent science showing how tree roots and their associated fungal networks work together, and how the removal of mature trees degrades the surrounding area.
- They ignore that leaving mature, older, dead, and dying trees in forests is extraordinarily productive for forest soils and species, and how removing them degrades forests badly.
- They ignore the economics of adding more lumber to the market, which creates more local for-profit demand for more local forest destruction.

Dozens of groups and individuals on the NJ Forest Task force voiced concerns like these strenuously.

NJ State Law needs to prohibit materials removal from NJ's publicly owned forests. All legitimate conservation goals can be met more effectively as a result, and the forests we have invested in for 60+ years will be strengthened.

The Task Force's loggers (who call themselves "foresters" to hide their constant self-interested imperative to remove precious materials from our public forests) did not disclose their offensive conflicts of interest. They didn't disclose how much money they made by harvesting forest materials from NJ's publicly-owned forests, which We the People preserved with our tax dollars and the State's sweat equity.

New Jersey Audubon did not disclose how much money they made from consulting contracts to remove materials from NJ's forests, though there was a FOIA for several big invoices by NJ Audubon charging \$6,226, \$10,000 and \$18,000 for tagging trees for removal and advising. NJA is deeply conflicted financially in favor of supporting more logging, under the guise of disinterested conservation. While NJA does valuable work outside of their promotion of materials removal from our forests, they must be called out for their undisclosed conflicts of interests in this regard; they have no standing until they disclose all their income from forest destruction projects.

I have spent the past 15 years working toward science-based environmental conservation, so I bring broad perspective to this topic:

- Worked for NJ Audubon in 2009-2010.
- Worked for The Nature Conservancy in NJ 2010-2013.
- I am a Rutgers Environmental Steward and have taken five additional Rutgers Cooperative Extension from top environmental practitioners in New Jersey.
- Chair of the Chatham Township, NJ Open Space Advisory Committee since 2010.
- Board of the NJ League of Conservation Voters for seven years
- Board of Morris Park Conservancy for a year.
- Co-founder and board member of Friends of the Drew Forest.
- Worked on dozens of local forest conservation, access and education projects with professionals, members of the public, elected officials, three major BSA Scout groups, and teachers.
- I also have a strong business perspective, having worked 23 years in financial markets after earning a BA from Cornell University and MBA from NYU.

Though some of the Task Force report's recommendations have merit, I strongly object to the Task Force report's ineffective protection of our forests, when it comes to logging, destruction, and materials removal from our forests. **The harms can and must be reversed before being codified into legislation.**

Sincerely,
Joe Basralian

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440x

*I totally and vehemently oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.**
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.**
- **Wood from state forests should never be sold.**
- **Too much discretion is left to a “science advisory panel.”**
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.**
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.**
- **One-third of New Jersey Forestry Task Force participants oppose the Report.**

We must stop demonizing wildlife and instead of taking all their land and immediately take to wiping out wildlife find, non-lethal ways to co-exist with nature.. NOT obliterate it.

John Bell

441x

Dear Senators,

I oppose the New Jersey Forestry Task Force Report because it is bad for wildlife and bad for forests.

We should make it a top priority to conserve both of them given the overdevelopment that is actually detrimental to any conservation efforts in our small state.

Thank you for your consideration and cooperation in this matter.

Sincerely yours,

James N. Benko

442x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Elizabeth Bennett*

443x

*Dear all,*

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Maoly Beras*

444x

I oppose the NJ Forestry Task Force report because it's bad for forests and wildlife.

Regards,

Cynthia Bergstein

445x

To whom it may concern:

I oppose the NJ Forestry Task Force Report for the following reasons: The report wrongly accuses deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment. Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA. Finally, one-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals.

Thank you.

Beth Berniker

446x

Hello,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. This Proposal will be detrimental to New Jersey's forests and wildlife, in particular deer. I find this to be unacceptable.

Sincerely,

Kevin Beversluis

447x

Greetings,

Hello,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. This Proposal will be detrimental to New Jersey's forests and wildlife, in particular deer. I find this to be unacceptable.

Sincerely,

Mari Beversluis

448x

March 15, 2023

To: Senate Environment Committee

We oppose the NJ Forestey report because it is bad for for wildlife and bad for forests and the environment.

Thank you,

Suzanne Binette  
Diana Rodenbeck

Sent from AOL on Android

449x

I am opposed to the NJ Forestry Task Force Report.  
It is bad for wildlife.  
It is bad for forests.

Developers and logging companies do far more damage to forests than deer. Opening up forests to logging companies gives a monetary incentive to cut down and remove trees. Wood from state forests should never be sold.

Offering deer meat to food banks is nonsense. It's a deceptive ploy to make hunting deer seem more socially acceptable. It is not. Food banks don't want deer meat. Hunted deer meat is not inspected by the USDA. It can also contain lead shot.

I am opposed to the Science Advisory Panel deciding what will be done with our forests and wildlife. Industry scientists will not care about animals and will support more timber sales, which destroys wild habitats

Thank you,

*Charles A. Bivona*

Charles A. Bivona

"Be unnecessarily kind  
For everyone you meet  
Is fighting battles  
You can't see."  
Unknown Author.

450x

Dear Sir/Madam - I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Regards,  
Eve Bolkin

451x

I oppose the NJ Task Force Forestry Report because it is bad for deer and bad for forests. In particular, hunting deer is not a solution to the complex host of issues facing our forests today. Targeting a single species is far more likely to have a negative impact on a forest rather than restore or improve its condition due to the interactions among all species necessary for the overall functioning of the forest. Characterizing hunting as a source of food for people in need serves only to distract from the strong and persistent pressures put upon the task force by hunting interests that would use our public lands as a personal opportunity for taking what belongs to us all. Likewise, market hunting is even more inappropriate on public lands supported by our tax dollars for us all to enjoy. Logging public lands also represents private profit taken at the expense of our public spaces. And finally, the science behind this report does not have the support of interest groups on the task force actually qualified to evaluate the basis for such proposals from a scientific standpoint, which is the only basis for legitimate decision-making when it comes to forests and the animal species that live there.

Jane Books

452x

To Whom it May Concern,

I am writing to express my opposition to the NJ Forestry Task Force Report.

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands. Our public lands are valuable for both wildlife, native plants, and for recreational non-harmful use by the public. They should not be used in a manner that results in the destruction of the natural environment.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment. Logging and developing of land is far more destructive towards trees and native plants than deer.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you for hearing my thoughts on this important issue.

Sincerely,

Jennifer Books

453x

I Terrie Bouchard oppose the Forestry Task Force Report.

Thank you,  
Terrie

454x

My reasons for my opposition to this report is below:

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you,  
Karen Breny

455x

I am strongly opposed to the NJ Forest Task Force proposal to remove old growth trees from Public Lands in Nj in order to plant "young trees". I am surprised that the NJ Forest Task Force does not understand that removing old growth trees is extremely detrimental to climate management. It releases excessive carbon stores into the atmosphere and encourages invasive species of plants to proliferate. Old growth forests support biodiversity, soil complexity, and water storage. Of course the NJ Forest Task Force certainly understands this.

The NJ Public Lands is an example of a precious standing ecosystem that serves as an educational tool for our youth and others regarding: carbon storage, rain water retention, wildlife habitat, and other ecosystem services that benefit everyone.

As these areas are replaced for logging or, worse, to simply replace old growth with young trees, our children and their children will be most affected.

Don't do this!!!!

Sincerely, Trudy M Bruke, DDS, MS. Westfield, NJ

456x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*J Brummell*

457x

WE'RE OUTRAGED BY THIS CORRUPT REPORT!!!! The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

STOP PANDERING TO HUNTERS AND DO THE RIGHT THING FOR NEW JERSEYANS AND NJ'S WILDLIFE!!!

Jeanne Cambouris

458x

To the Senate Environment Committee:

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Please do better for the forests and animals of NJ, they desperately need our protection.  
These proposals will gravely hurt them.*

*Sincerely,  
Natalie Cerciello*

459x

*I STRONGLY oppose the NJ Forestry Task Force Report because it is bad for NJ wildlife and bad for NJ forests.*

**OVER One-third of New Jersey Forestry Task Force participants oppose the Report.** *The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.*

**NOTE:**

- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** *Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.*

Maria Cetrola

460x

Dear Joint Senate Environment & Energy and Assembly Environment & Solid Waste Committee:

My name is Lydia Chambers and I live in Harding Township. I participated in the year-long NJ Forest Task Force and was dismayed by its final result.

The task force did not accomplish the goals set forth by Senator Smith because it did not do anything to stop the clear-cutting that is doing irreparable damage to NJ forests under the guise of "stewardship". It did not factor the important role our forests play in climate change mitigation into its recommendations.

Please consider putting a moratorium on tree cutting, wood removal, and use of heavy machinery in all publicly-owned forests in NJ until the proposed framework is improved and implemented (which could take years). A vast majority – 85% of the NJFTF participants voted against logging in public forests during a straw poll.

The framework could be a very useful tool to protect NJ forests if the terminology and intent were tightened up to be more protective of natural processes and prohibit cutting and removal of wood for financial gain (only for pest control as last resort).

Thank you for your thoughtful consideration,  
Lydia Chambers

461 x

Dear Senator Smith:

I wish to comment on the NJ Forestry Task Force's Report. I oppose all of the 16 recommendations or proposals in the report, which consists of 274 pages, because there is no consensus among all its members. In fact, one-third of the Task Force participants such as the Animal Protection League of New Jersey, the League of Humane Voters of New Jersey, the Highlands Coalition and New Jersey Forest Watch, all oppose implementing the proposals contained in the report and for good reason.

First, donating deer meat to food pantries not only poses a serious public health hazard, but is also reckless. This meat is not inspected by the USDA and contains lead shot, zoonotic viruses or Chronic Wasting Disease (CWD). CWD is a cow-like infection that has already spread throughout Pennsylvania. CWD is a fatal progressive neurodegenerative illness spread by prions, a zombie-like pathogenic protein that isn't alive and can't be killed. [www.vox.com/2019/2/21/18233227/zombis-deer-disease-map](http://www.vox.com/2019/2/21/18233227/zombis-deer-disease-map). Introducing deer meat for human consumption is dangerous. Deer should be left to forage in the forests as part of a natural and a healthy ecosystem, not taken for human consumption. In fact, the COVID-19 virus first began in a live animal market in Wuhan, China. [www.theguradina.com/world/2020/apr/28/how-did-the-coronavirus-start-where-did-it-come-from-how-did-it-spread-humans](http://www.theguradina.com/world/2020/apr/28/how-did-the-coronavirus-start-where-did-it-come-from-how-did-it-spread-humans).

Second, the proposals are inconsistent. As an example, included within the Framework is recommendation 15 which provides that:

"The NJDEP should not include commercial profit as a goal in any forest management plan on public land. Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals."

But to sell a wood product, acres of trees may invariably have to be clear-cut. This is a commercial cutting of trees. Moreover, what is an approved plan? Who decides the plan? What are the ecological health and climate considerations? The cutting of just one tree releases CO2 back into the environment and contributes to global warming. Is this not a climate consideration? Wood from New Jersey's State Forests should never be sold.

Just today, NJ Spotlight News reported that 21 acres of a mature upland forest was cleared, thousands of trees cut down and valuable wetlands were irretrievably damaged at the Glassboro Wildlife Management Area by the NJ Division of Fish and Wildlife without the benefit of any public notice and comment. [www.njspotlightnews.org/2023/03/nj-conservation-groups-irate-over-state-agencys-forest-clearance-work](http://www.njspotlightnews.org/2023/03/nj-conservation-groups-irate-over-state-agencys-forest-clearance-work). Is this the future of land management?

462x

I commend your past environmental endeavors, however, please do not adopt the proposals contained in the report in the interests of the taxpayers of New Jersey such as myself. Lumber from New Jersey's State forests should never be sold. The clear-cutting of forest land presents a threat to the forest's fragile eco--systems, promotes run-off and contributes to Global Warming. Already 110+ acres have been clear cut on Sparta Mountain, depriving residents of scenic hiking trails and an opportunity to enjoy what is left of New Jersey's dwindling wildlife. An article in the Health and Wellness Section of the Wall Street Journal, February 16, 2021, notes that:

"As people spend more time indoors, a mountain of scientific research says spending time in nature is critical to health and increases longevity"

New Jersey should therefore be planting trees, not clear-cutting acres of old growth forests and preserving what little is left of New Jersey's fauna and wildlife for future generations. Accordingly, the report is a dangerous step in the wrong direction.

Very truly yours,

Robert Cini

463x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Please consider the consequences. Thankyou for your consideration! Jill Coletti

464x

Hello. I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands which I strongly oppose.

The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment. We continue to encroach on their domain, instead of investing in dead cities and revitalizing these urban waste lands.

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA. Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land. Why are we pursuing this?

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

"I will write peace on your wings, and you will fly all over the world."-Sadako Sasaki

Sincerely,

*Maria Cecilia Correia*

465x

To NJ Senate Committee,

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank You for your time.

Sincerely,

Clara Cracchiolo

466x

To The Joint Legislative Committee,

I am a resident of New Jersey and very concerned about the recent proposal by the NJFTF (New Jersey Forest Task Force). Specifically, the proposal does not address logging our natural public forests. Mature trees should be preserved and protected.

Cutting down mature trees will result in a significant loss of wildlife habitat, loss of carbon storage, and could potentially result in additional uncontrolled flooding in many areas of New Jersey.

Additionally, I believe that we should protect mature trees from deer and invasive species. Measures to do so would aid in fragmentation, enhance migratory pathways, and certainly help to mitigate the effects of climate change.

Please consider my comments and do not approve of the current proposal presented by the NJFTF. Logging and tree "maintenance" along with "ecological health" need to be clearly defined and addressed.

While I am not a biologist, I am a Master's Degree Registered Nurse and fully understand what effects that climate change and the loss of mature forests have on the health of humans, wildlife, plants, and the earth.

Thank you for your serious consideration of my request. Feel free to contact me to discuss further or if you would like me to participate in re-drafting the proposal and or to become a member of the NJFTF.

Sincerely,  
Colette Crescas

467x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Thank you.  
Teresa Croizier

468x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Mary Ann D'Alessandro

469x

**I oppose the NJ Forestry Task Force Report because:**

- **The Report misleads about the problem sources** of forest destruction by not identifying insects and invasive jumping worms as causing more forest damage than deer and minimizing developers and logging companies destruction of forests.
- **Wood from state forests should never be sold** that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** which populated with industry scientists can not be objective, i.e., will not care about animals and will support more timber sales, which destroys wild habitats.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

I vote so I hope you do not ignore the public's comments.

charles davidson

470x

To whom it may concern:

***I oppose the NJ Forestry Task Force Report because it is bad for wildlife  
and bad for forests.***

Debra Demmin

471x

My name is Valerie DeVine, .... I oppose the NJ Forestry  
Task Force Report as it is bad for wildlife+ bad for forests. Thank you.

472x

Submitted by:

Jennifer Downing

Please Note:

While I am "borrowing" some comment points from other sources, rest assured I am OPPOSED, and have been frustrated by NJ DEP F&W policies and practices in the Highlands Region (where I reside) since the inception of the destructive forestry "plans" here. New Jersey is the most densely populated state in the nation, and we need our environment to filter our air and water at a minimum. Destruction of our natural resources should NEVER include profiting off the destruction! NO PROFIT FOR WOOD OF ANY SORT is acceptable in my view, and water sources, particularly in the Highlands and Pinelands regions should be of the utmost importance. PLEASE safeguard our resources and those of future generations. That having been said, my (edited), specific points follow, and I respectfully request that you READ them in entirety, entering them into whatever record exists.

473x

- The Report demonizes deer while developers and logging companies continue destroying forests. It blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage yet. Deer management may be required, but to blame them and ignore the obvious destruction by developers and loggers is disingenuous at least, and seems to further an agenda most New Jersey residents do NOT support.
- Promoting the donation of deer meat to food pantries is not a practical idea. Most pantries do not even carry perishables, and the dating of meats is an issue in its own right. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. For donations of venison to even be considered, lead shot would need to be eliminated, and commercial standards for (distribution or sale) of meats. At least one food pantry has stated that they have no interest in distributing deer meat and, indeed, it would likely pose liability. Even the mention of such an "advantage" appears to me to be a public relations stunt to make hunting more socially acceptable to the New Jersey population, who generally opposes it. In any event, both hunters and non-hunters OPPOSE the commercial sale of deer meat by hunters, and even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land
- WOOD FROM STATE FORESTS (or other protected lands) SHOULD NEVER BE FOR SALE. This is one of the extreme sticking points here in the Highlands Region, where Sparta Mountain ("preserved" under Green Acres) is now being systematically damaged and destroyed by NJDEP. Furthermore, what is NOT sold is creating a MAJOR fire hazard in this area. The Report proposes allowing the sale of wood, creating an incentive to cut down and remove trees for profit! There is NO NEED to cut down and remove trees in our state forests and IF a need DID arise, the wood should be DONATED to Habitat for Humanity, for example. Simply put, NO TIMBER SALES EVER!
- Too much discretion is left to a seemingly cherry picked "science advisory panel." We know that forestry industry scientists will NOT care about flora or fauna, and will support more timber sales, which destroys wild habitats. For YEARS, the Highlands Coalition has put forth QUALIFIED SCIENTISTS with extremely limited respect paid to their opinions.

474x

- Inordinate trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are "in line with public opinion". The Report proposes directing the NJDEP to develop forest management plans on public lands, but we, HERE IN THE HIGHLANDS know all too well, that the public comments regarding logging (or bear hunting) are almost completely IGNORED.
- One-third of New Jersey Forestry Task Force participants OPPOSE the conclusions of the Report. The Report DOES NOT even represent a consensus of the task force members! Yet, the agenda is being pushed upon the residents of New Jersey, as have previous misguided concepts and practices by a DEP that is largely driven by revenue that puts the very natural resources the department is to protect at risk, even peril. Some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch. Gee, some of those are based in the Highlands Region. Could it be that we northernmost resident taxpayers in the state are simply INVISIBLE?

Dear Senate Environment Committee,

I am writing to express my opposition to the NJ Forestry Task Force Report. There are multiple points in this report that are absurd including donating deer meat. Have you ever volunteered at a food bank and seen people who are food insecure wanting deer meat? I have and that is the last thing they want. This report is extremely concerning for our wildlife and our environment. The very groups that are tasked with protecting our environment are helping to destroy it. Please add my name to the list of those opposing the report.

Sincerely,  
Nancy Ehrlich

476x

**I oppose the NJ Forestry Task Force Report  
because it is bad for wildlife and bad for forests.**

Steve Ember  
Lifelong NJ Resident

477x

I OPPOSE THE NEW JERSEY FORESTRY TASK FORCE REPORT – it is a detriment to WILDLIFE and for the FORESTS. Please record my opposition.

A concerned New Jersey citizen:

DIANE FAMULA

478x

Dear Sir or Madam,

I am a resident of Dumont NJ and I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Additionally, wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands. The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Sincerely,

Edmund Fanning

479x

Dear Sir or Madam,

I am a resident of Dumont NJ and I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Additionally, wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands. The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Sincerely,

Emma Fanning

480x

To: Senate Environment Committee.

I oppose the NJ Forestry Task Force Report because it is both harmful to NJ wildlife and harmful to NJ forests. This report blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. The report promotes the donation of deer meat to food pantries isn't smart - meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. Over a third NJ Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against this Report, along with groups like the Highlands Coalition and NJ Forest Watch.

I hope you give strong consideration to a different path forward.

Warmly,  
Katy Fendrich-Turner

481x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Steven Fenster

482x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.**
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.**
- **Wood from state forests should never be sold.**

*Thank you,  
Elena Marie Fetch*

483x

I oppose the NJ forestry task force report because it is bad for wildlife and bad for forests.

Nancy Fleming

484x

**From:** Jeanne Fox <jeanne.fox@njleg.org>  
**Sent:** Sunday, February 19, 2023 11:14 PM  
**To:** Senator Bob Smith <esmith@bobsmithandassociates.com>; Gurrentz, Joseph <JGurrentz@njleg.org>; Kennedy, Asm. D.O. <AsmKennedy@njleg.org>  
**Cc:** Mercadante, Dayna <DMercadante@njleg.org>; Klanco@njleg.org; Aloï, Samuel <SAloï@njleg.org>; Theodore, Elizabeth <ETheodore@njleg.org>; Hansen, Eric <EHansen@njleg.org>  
**Subject:** Re: Joint Hearing regarding New Jersey Forest Task Force Report

Dear Senator, Assemblyman and Joey,

I just found out that the Committee Chairs are limiting testimony regarding the NJ Forest Task Force to 2 pro and 2 con organizations. I have already changed my schedule so that I could come down to testify before you.

As I think you know, I have actively participated as an interested individual in the Task Force since last Spring (as well as on the Invasive Species Workgroup). During these months I have listened to the various experts and read peer review studies and articles. Serving in the past as DEP Deputy Commissioner & Commissioner, EPA Region II Administrator and BPU President/Commissioner, I have a keen interest in utilizing our State, county & municipal forests to help in our existential fight for mitigation (and adaptation) of our growing Climate Crisis. I have deep respect for all of the individuals and organizations involved in the Task Force. I am proud that so many New Jerseyans are concerned about these critical issues.

Though an individual, I have, I think, a unique perspective on the report and the many issues/problems addressed in it. Thus, I respectfully request the opportunity to address the Joint Hearing on February 22nd.

I signed on in support of the Framework because, on balance, it includes significant steps forward on important issues but I do not agree on several aspects of it. Most critically, Climate Change must be the priority for all of our actions moving forward. I therefore submitted my dissent as well. I include my dissent below.

Thank you for addressing this important issue.

Sincerely,

*Jeanne*

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485x

**Dissenting opinion** 2500 characters (includes spaces) \*

I thank the four Task Force leaders for your time, effort and commitment to this important topic. I also am grateful to the many forest experts and concerned citizens for their dedication to this effort. I believe that the Chairs did gather a general consensus on most topics, such as the critical topics of invasive species; deer management; the necessity for establishing a good process for public comment/input; and a true rule-making with a one year deadline. The establishment of a diverse expert panel is a good step forward. I appreciate other changes made by the Chairs such as adding in Recommendation #6 “a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel) for their carbon benefit.” Old trees retain large amounts of carbon which is a necessity at this time. I also agree with most of the other Recommendations though I did wish for clarifications regarding some of them but I certainly do not have enough knowledge to object in any way. At least in the near term (probably 20 years), mitigating the Climate Crisis must be THE priority goal in forest management. In fact, I believe that Recommendation 7 is misleading when stating “active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health.” Recommendation 7 cites consistency with the NJ Global Response Act 80X50 Report’s “carbon sequestration goals” “which discusses proactive management for carbon defense including thinning and burning.” pp 153-160. So, I went to that section which speaks clearly to carbon sequestration’s 5 pathways: #1)reforestation, #2)avoided conversion of natural lands, #3)salt marsh and seagrass restoration and enhancement, #4)conservation management of agricultural lands, and 5)proactive forest management. Only Pathway #5 - proactive forest management discusses “active forest management through thinning and selective burning.” The intent is to lessen the risks of severe wildfires and pest infestations. However, that pathway concludes that “additional analysis is needed, however, to fully understand the carbon gain potential (or avoided emissions) from carbon defense strategies such as active forest management through thinning and selective burning.” Thus, I urge that, until that critical analysis is done, crown separation and tree thinning not be permitted in old growth forests.

486x

First, I must gratefully thank Senator Smith for establishing this important task force. We met frequently with over 100 people participating each time. In addition, as you know, the Invasive Species Subgroup, on which I sit, has done some excellent work. We are quite hopeful that Senators Smith/Greenstein bill will be amended as recommended by the Subgroup and become law. I submitted my brief written remarks to you on February 22nd while at the Joint Legislative Hearing on the Forest Task Force.

I sincerely commend the co-chairs for their labor-intensive efforts. They worked hard and were committed to this vital effort. The four co-chairs spent a lot of time together discussing these issues and, I think, had some internal disagreements but decided to stick together and thus reached their own consensus Framework.

I won't repeat my previous comments but will be direct in what I feel is most important for your consideration.

In the "Participant Response to Framework" (p.7), participants were asked "to support or not support the framework in its entirety, even if there might be some aspects that they do not agree with completely." So, I signed on as a supporter of the Framework but also filed a dissent most specifically stating that Climate Change must clearly be **THE priority**. Though the issue of Climate Change being the priority, was raised quite a few times by many of us, the Task Force never voted on it. It should be evident to all that, at this point in time, carbon sequestration/storage is much more crucial to the world than the other still important goals, e.g. improve ecosystems, protect water quality, recreation. Carbon is certainly NOT as stated in the Report an "equally important goal" to the others. Climate Change is the greatest, most perilous threat to our forests' ecosystem, animals, etc. It is, as often stated, existential. Many of us, including myself, supported most of the recommendations, i.e. the "wholistic framework," but certainly not all of the specifics. So while two thirds of the participants supported the Task Force Framework, I am fairly certain that the rationale for that result is that the Framework is clearly much better than the status quo but is not the best we could do.

487x

I was quite disappointed at the Report's total misstatement (p.11) that "Participants who provided dissenting opinions on logging also tended to report that the only goal for the Task Force to consider for managing state forests was climate change, specifically carbon sequestration and carbon storage. Biodiversity, wildlife protections, water quality, building resilience to impacts from climate change, and other ecological goals were considered subordinate or should not be considered at all alongside carbon sequestration and storage." Possibly "subordinate" but certainly "should not be considered at all" is simply untrue. In fact, Climate Change is currently having a direct impact on the others and will increasingly continue to negatively impact them into the future. One could say that they are collateral damage.

Also, it was stated that the TF met an impasse on **pro-forestation** (growing forests + keeping intact forests) vs logging but, I believe, that we never voted on that and, if we had, the result would have most likely been different. The most recent peer-reviewed international science strongly supports pro-forestation as the best methodology moving forward to ameliorate Co2. A number of experts testified that the best way forests can help in the Climate Crisis is to allow forests to grow old. Older trees store much more carbon than new trees (which typically take decades to grow). In addition, substantial amounts of carbon are stored underground in old growth forests. Mature forests are carbon reservoirs and must continue to hold in that carbon. Obviously this effort does not preclude Reforestation (replanting where there once were forests), while certainly not as impactful as retaining existing forests, every tree will help.

The Task Force certainly agreed on a number of recommendations. Beyond a doubt, a **Deer** Management Plan is critical. This huge problem has been with us for decades. There is no simple solution. In addition to the numerous vehicle accidents, deer eat native baby trees. And, we must absolutely deal with **invasive species**. We need to re-establish the Invasive Species Council originally established by an Executive Order but now should include all invasive species - not just plants). We enjoyed significant consensus on these two recommendations as well as on the fundamental necessity to identify a permanent source of revenue to maintain and preserve our forests. I note that we didn't spend much time on the topic of off-road vehicles or ATVs. Another

topic mentioned but not really discussed was that arson penalties should be increased.

I also know the we enjoyed a significant consensus regarding preservation of our beloved **Pinelands**, New Jersey's unique ecosystem. Many of these recommendations can likely move ahead more quickly than some others. Some of my specific thoughts, based upon comments received: endangered species such as the Bog turtle need this special ecosystem to exist. Prescribed burns are needed to preserve the Atlantic White Cedar. A Climate Change assessment should be done first which would then determine the need for fire breaks. Then the cedar restoration should follow. Planning should be done before almost any ecological burn. The burns should be determined by PhD forest ecologists. We should start with a comprehensive plan for Wharton State Forest, the single largest tract of land within the New Jersey State Park System. We are loosing Atlantic White cedars so they should not be harvested. Possibly competing trees should be cut to preserve the pines. But only cut trees for such critically important reasons. New Jersey must preserve our Pinelands and our famous "cedar water." Wood should not be removed if downed or cut for ecological reasons. If instead it is determined that trees must be cut for ecological reasons and are sold, we must try to ensure that the wood comes back to New Jersey.

An example of the dire consequences of clearcutting is the clearcutting of many acres of large trees (100-175 years old) on **Sparta Mountaintop** in order to create habitat for the Warbler. This destruction released substantial amounts of carbon. Possibly an impact analysis should be done now that would quantify the negative carbon impact of the action. These type of practice should not be authorized until a Climate Change assessment is conducted. Modern science shows that "natural soil" holds more carbon than does post-agriculture soil". It also shows that trees should be thinned from below and not in the canopy. Heavy equipment/machinery should be excluded from our forests but for a very few high-bar exceptions. Clearcutting for "ecological purpose" to create habitat for wildlife is not as important as retaining carbon because the greatest danger to wildlife is the Climate Crisis. The next ten to twenty years is critical to lessen Climate Change impacts.

One major problem is, as Tom Gilbert stated, that the Task Force never defined "**ecological health**." In the Task Force survey (p.15/16): 66%

489x

said cutting/removing trees should be done only

for "ecological health." I was one of that 66% but my definition of ecological health does not include clearcutting. Also on the Wood Removal question, 41% said yes for ecological health; 20% for any reason & 36% for never. I was also a part of that 41% but, in hindsight, and after reading more recent scientific studies, would have changed my vote. In any case the State clearly cannot incentivize logging.

In 2004 DEP identified 44 natural land area that should have plans developed however it appears that this effort was never staffed so no plans were created in almost 20 years. DEP needs additional resources and staffing for this key planning effort. If any plans were created they need to be reviewed & then executed - especially in Pinelands.

Studies should be done for each forest area/zone before any further actions are taken. The ideal would be for each area to have a customized approach. At the minimum, each region needs a well defined plan. We all agreed that the Pinelands and the Highlands are completely distinct from each other.

The NJ Global Response Act's 80x50 Report's (p153-160) sets out five great "carbon sequestration pathways" but it specifically states that "additional analysis is needed, however, to fully understand the carbon gain potential (or avoided emissions) from carbon defense strategies such as active forest management through selective thinning and burning." New Jersey needs to enforce a fairly solid moratorium on "active forest management" in our forests until the needed analysis and plans are finalized. We need the best research - utilizing the foremost peer-reviewed international forest research. Then we set out our priorities - most likely starting with the Pinelands. NO cutting of old growth trees should be permitted until the proper peer-reviewed studies and plans are completed.

Sincerely,

*Jeanne Fox*

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**My Written Testimony submitted on February 22:**

490x

I have actively participated as an interested individual in this Task Force since last Spring. During these months I have listened to the various experts and read peer review studies and articles.

Serving in the past as DEP Deputy Commissioner & Commissioner, EPA Region II Administrator and BPU President/Commissioner, I have a keen interest in utilizing our State's forests to help in our existential fight for mitigation (and adaptation) of the growing Climate Crisis.

I have deep respect for all of the individuals and organizations involved in the Task Force. I am proud that so many New Jerseyans are concerned about these critical issues.

I signed on in support of the Task Force's Framework because, on balance, it includes significant steps forward on important issues, but I do not agree on several aspects.

Most critically, Climate Change must be the priority - not one of several. Therefore, I also submitted a dissent as well.

In my dissent I thanked the four Task Force leaders for their hard work as well as the many forest experts and New Jersey citizens for their dedication to this effort.

I believe that the Chairs did gather a general consensus on most topics, such as the critical topics of invasive species; deer management; the necessity for establishing a good process for public comment/input; establishment of a diverse expert pane is a good step forward.

I appreciate other that the Chairs adding in Recommendation #6 "a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel) for their carbon benefit."

Old trees retain large amounts of carbon which is a necessity at this time. I also agree with most of the other Recommendations though I did wish for clarifications regarding some of them but I certainly do not have enough knowledge to object in any way.

At least in the near term ( probably 20 years) mitigating the Climate Crisis must be the priority in forest management.

I believe Task Force Recommendation #7 is misleading when it states "active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health."

Recommendation #7 cites consistency with the NJ Global Response Act 80 X 50 Report's "carbon sequestration goals" which discusses proactive management for carbon defense including thinning and burning." pp 153-160.

So, I went to that section of the Act which does speak clearly to carbon sequestration's 5 pathways: #1)reforestation, #2)avoided conversion of natural lands, #3)salt marsh and seagrass restoration and enhancement, #4)conservation management of agricultural lands, and 5)proactive forest management.

Only Pathway #5 - pro-active forest management discusses "active forest management through thinning and selective burning."

The intent of thinning and selective burning is to lessen the risks of severe wildfires and pest infestations. However, that pathway concludes that **"additional analysis is needed, however, to fully understand the carbon gain potential (or avoided emissions) from carbon defense strategies** such as active forest management through thinning and selective burning."

Based on that statement as well as the substantial current international science which finds that old forests sequesters much carbon below ground, I urge that, until that critical analysis is done, crown separation and tree thinning not be permitted in old growth forests.

Thank you for your time.

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### **My Dissenting opinion** (limited to 2500 characters)

I thank the four Task Force leaders for your time, effort and commitment to this important topic. I also am grateful to the many forest experts and concerned citizens for their dedication to this effort. I believe that the Chairs did gather a general consensus on most topics, such as the critical topics of invasive species; deer management; the necessity for establishing a good process for public comment/input; and a true rule-making with a one year deadline. The establishment of a diverse expert panel is a good step forward. I appreciate other changes made by the Chairs such as adding in Recommendation #6 "a primary goal of protecting mature forests and providing for future old growth forests (as defined by the science advisory panel) for their carbon benefit." Old trees retain large amounts of carbon which is a necessity at this time. I also agree with most of the other Recommendations though I did wish for clarifications regarding some of them but I certainly do not have enough knowledge to object in any way. At least in the near term (probably 20 years), mitigating the Climate Crisis must be THE priority goal in forest management. In fact, I believe that Recommendation 7 is misleading when stating "active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health." Recommendation 7 cites consistency with the NJ Global Response Act 80X50 Report's "carbon sequestration goals" "which discusses proactive management for carbon defense including thinning and burning." pp 153-160. So, I went to that section which speaks clearly to carbon sequestration's 5 pathways:

#1)reforestation, #2)avoided conversion of natural lands, #3)salt marsh and seagrass restoration and enhancement, #4)conservation management of agricultural lands, and 5)proactive forest management. Only Pathway #5 - proactive forest management discusses “active forest management through thinning and selective burning.” The intent is to lessen the risks of severe wildfires and pest infestations. However, that pathway concludes that “additional analysis is needed, however, to fully understand the carbon gain potential (or avoided emissions) from carbon defense strategies such as active forest management through thinning and selective burning.” Thus, I urge that, until that critical analysis is done, crown separation and tree thinning not be permitted in old growth forests.

To Whom It May Concern,

As a NJ resident, I strongly oppose the NJ  
Forestry Task Force Report.  
It is bad for Wildlife and bad for forests.

The report demonizes deer while developers and logging companies continue destroying forests.

Deer are blamed for deforestation when scientists have found insects and invasive jumping worms have caused forest damage.

I vehemently oppose the commercial sale of deer meat by hunters, known as market hunting.

Both hunters and non-hunters oppose the commercial sale of deer meat.  
Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

I am deeply appalled there is any thought of bringing deer marketing hunting to NJ.

We are going back as a state instead of  
moving into the 21st century.

This is absolutely the most inhumane  
act of cruelty.

NJ should be better than this.

Please, I implore you not to go forward with  
this horrific act of deer market hunting  
and I oppose the entire NJ Forestry Task  
Force Report.

Thank you,  
Doreen Frega

494x

*oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important talking points:

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still

legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch. Sincerely, Mrs. Joy Fregonese,

497x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Thank you.*

*Lisa Friedlander*

498x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and healthier alternatives to eating animals are available.

Most importantly, the killing of these gentle beings is in itself unethical and cruel.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sherry Fudim

499x

*To whom it may concern,*

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Christina Galvin*

500x

I go walking in the Drew Forest regularly... We need these spaces now more than ever! And we need to be stewards of nature and its ecological systems if we want to truly thrive. I oppose stewardship plans that include removal of mature, native trees that are our best defense against climate change!

Monica Garcia

501x

To Whom it May Concern:

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

As a NJ resident for over 30 years, I am witnessing how quickly forests and other green zones disappear for the sake of developers trying to build more and more on these lands. Forests are essential for human health and survival especially in the current times of climate change. Trees produce oxygen and remove carbon dioxide from the air.. We need to preserve and protect our state's natural forests!

Forest is a natural habitat for native wildlife. I do not approve of the idea of killing deer for meat for the hungry. This is the wrong way to go on many aspects. One of them, probably, the main one, is that such interaction with wildlife has a big threat of creating another deadly pandemic. Currently, deer are already suffering from a deadly infectious disease which kills a lot of them. Clearly, hungry people are not the ones with the strongest immune system, and a pandemic might start very quickly. Hunting deer for meat is very, very dangerous. NJ. officials will be fully responsible if this happens!

Deer have been part of the ecosystem for thousands of years. They are falsely blamed for destroying forests while the main cause of dying forests is human activities, pollution, and invasive species. This argument about deer is ridiculous. Deer are beautiful and gentle creatures and should be protected!

Most people in NJ oppose hunting. Even hunters accept that they injure more animals (deer) than they kill. Hunting destroys animal families and habitat, leaves dependent babies to starve and die.

Please, reject this report and defend our state forests for the next generation!

Sincerely,  
Tatiana Gelfand,  
NJ.

502x

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As a NJ taxpayer, your constituent and homeowner, *I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

· **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

· **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

· **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

· **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

· **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative

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Procedure Act, but we all know that the public comments are overwhelmingly ignored.

**Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

**One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

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In *Laudato Si'*, his exhaustive letter to the Catholic Church on caring for the environment, Pope Francis covered a wide array of issues including our treatment and view of animals. "Every act of cruelty towards any creature is 'contrary to human dignity, 'If we approach nature and the environment without this openness to awe and wonder, if we no longer speak the language of fraternity and beauty in our relationship with the world, our attitude will be that of masters, consumers, ruthless exploiters, unable to set limits on their immediate needs. By contrast, if we feel intimately united with all that exists, then sobriety and care will well up spontaneously."

New Jersey has a lot of problems facing every NJ citizen. Our neighborhoods are saturated with empty foreclosed homes. Camden is crime ridden and drug infested with fentanyl. NJ continues to be a leader in the nation with people leaving our State. We continue to have the highest taxes in the country but roads in my neighborhood haven't been repaired in years even with the recent giant gas tax hike.

Yet Trenton continues to waste its time with personal issues by some selfish people in the Senate and Assembly trying to get their own way for benefit, payback and future political contributions. Work on real issues to improve our State.

504x

Man's inhumanity to man is only surpassed by man's inhumanity to other living creatures.

John T. Gfroerer

**Senate Environment Committee:**

***I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.***

***Kim Giberson***

**506x**

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Susan Gordon*

507x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests

. Martha Halmo

508x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Catherine Harrington*

509x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

David H Hartzell

510x

To Whom It May Concern:

I oppose the NJ Forestry Task Force Report because, in my opinion, it is bad for wildlife and forests.

Sincerely,

Mary E. Healy

511x

Hello,

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

Thank you for listening

Loraine Henry

512x

I am writing you about the Deer Market Hunt. I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Regards,  
John Hila

513x

Hello,  
I totally OPPOSE the NJ Forestry task force report.  
It is BAD FOR FORESTS AND BAD FOR WILDLIFE !!

Andrea Hirschfeld

514x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Diane R. Hoffman

515x

i am asking you to toss out the nj forestry task force report because it will be a disaster for wildlife and our forests. thank you, james a hughes

516x

My name is Nicholas Huss, and I oppose the NJ forestry task report because it is bad for wildlife and bad for the forest.

Innocent sentient beings will die needlessly and our lifeline of oxygen (the trees) will continue to deplete. Think about it from the deer perspective, what if you were the one being hunted would you want to be shot down because you were born into the wrong skin? Probably not so why do it to them? Please have a heart and do the right thing. Stop taking away from someone else's home. Trees play a vital role in our own survival as well, if it weren't for the trees pollution would run rampant. Have a nice day.

517x

I oppose the New Jersey forestry task force. My name is L a u r e t t a iavarone

518x

Hello

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Claudia Ionescu*

*"Be kinder than necessary because everyone you meet is fighting some kind of battle."*

*J. M. Barry*

519x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Shannon Irwin

520x

From  
Melissa Jacobs  
Ken Green  
Patricia Tuttle

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important talking points:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both

task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

522x

Dear NJ Senate Environmental Committee members,

I oppose the NJ Forestry Task Force Report. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands. Compare our public lands to other states and it's clear our forests have been ravaged. Protecting our forests is in our best interest. Loggers and developers, not deer, destroy our forests. Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land. Donating hunted deer meat to food pantries does not justify hunting and many food pantries are uninterested in distributing hunted deer meat as it is not inspected for safety by the USDA. Importantly, a third of New Jersey Forestry Task Force participants oppose the Report and it doesn't represent a true consensus of the task force members. Animal Protection League of NJ and the League of Humane Voters of NJ are both task force members that voted against the Report. The Highlands Coalition and NJ Forest Watch also voted against. Thanks for your time,

Shannon Jacobs

523x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Kelly Janocko

524x

I oppose NJ Forestry Task Force Report because it's bad for wildlife and forests.

Richard Jaretsky

525x

To the New Jersey Senate Environmental Committee;  
I'm writing to let you know that I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.  
Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you for taking the time to read this and address it in favor of the people.

Sincerely,  
Lisa Jess

526x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important talking points:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Cheryl Johansen

527x

I oppose the NJ Forest Report because it is harmful to wildlife and totally irresponsible to our previous forests. It must not be approved in any way.

Thank you.

Ginny Johnson

528x

Im writing to add my objections to the proposal to take away NJ's citizens' Natural property and turn that land into the hands of private money makers on the pretense of saving trees. It will take "developers" just weeks to remove natural habitat that the deer and other wildlife would take years to destroy, if at all. Nature has a way of replenishing itself. Stop messing with NJ's land. It is supposed to be protected, not turned over to private developers. We need to keep New Jersey the green GARDEN STATE.

Marilyn Johnson

529x

Dear Senate Environment Committee,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,  
Elizabeth Jonach

530x

Dear Members of the Committee,

I am disturbed to hear about the plans to cut down mature trees and to replace them with young trees in the Drew Forest in Madison, NJ.

Mature trees play a different role in the ecosystem than young trees, they sequester more carbon and provide more shade. They also are beautiful and add special character to the town. The number of mature trees in Madison NJ is, unfortunately, shrinking. We need to do all we can to preserve the mature trees we have left.

Sincerely,  
Yana Kane-Esrig

531x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests for the following reasons:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

James Kent

I oppose the NJ Forestry Report because it is bad for wildlife and it is bad for forests.

Margaret Kent

533x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important talking points:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Quincy Kirsch

535x

Dear Senate Environmental Committee members,

I am concerned about the NJ Forest Task Force recommendations for logging. Cutting down mature trees to allow more sunlight is does not apply the best available science. Any state plan should pay attention primary ecological components of the forest: water resource production and storage; biodiversity; soil complexity; compatible human recreation; and carbon capture and storage. Logging to create young forests allows edge, invasive species to spread and diminishes the habitat for wildlife.

Sincerely,

Howard Klein

536x

I am contacting you to express my opposition to the NJ Forestry Task Force Report. It does not help wildlife or our forests.

We place too much blame on the wildlife (deer) for destroying our forests. There are other blames for deforestation such as insects that are proven by science.

I feel this is an excuse for hunters to kill deer and to promote that it is being donated to food pantries in my opinion is more for show and to make it seem more acceptable. As far as I know this meat is not inspected by the USDA and may contain lead shot which is still legal in NJ for deer hunting. And let's take a poll of food pantries and make a list of those that will accept and distribute this meat. And generally speaking most people, hunters included, oppose the report's proposal to the commercial sale of deer meat. This isn't appropriate use of public land.

And why are we cutting trees down? We need trees in our state forests. And selling it for a profit just promotes cutting more trees, things are money driven in our world. This isn't going to help us. And this also destroys wild habitats.

And what is this "science advisory panel?" As far as I know scientists have no problem using animals and don't care about them generally speaking. It seems like things are put in place to move forward with what this report supports. There needs to be diversity in this decision making. Different points of view to make better decisions.

Why are we using the Administrative Procedure Act's public comment process to assure the policies are in line with public opinion? There needs to be something else in place. I would say our comments are for the most part ignored.

Looking at the report there are many NJ Forestry Task Force participants who oppose this. The report does not represent enough of these members based on statements.

Thank you for considering my opinions and comments on this matter.

Carol Kloss

537x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Maureen Koplow

538x

Hello - I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- Further, the report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.
- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.
- -Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- -One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,  
Kimberly Kozakiewicz

539x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Sheila Kraus

540x

Dear Senator Smith:

I wish to add my comments to the New Jersey Forest Task Force recommendations and framework, as presented to you and the Joint Committee on March 22. I was a member of the Task Force (originally on the Climate Change sub-task force) and attended most of the meetings last year. I was present in the audience when during the March 22 hearing.

I appreciate the time that the Task Force Leaders donated to this effort, and I know there were many details and logistics that they had to juggle to set up and run the meetings. However, I was disappointed that the number one issue I joined the Task Force to discuss and try to impact was never brought into a meaningful discussion: the removal of mature trees on our public lands that continues to occur under the guise of 'forestry management' or 'stewardship.'

This removal constitutes a catastrophic threat to forest health and native biodiversity, and destroys our best defense against climate change. Mature natural forests store enormous volumes of carbon and can continue to do so far into the future, if we'll only allow them to simply remain in place.

I agree with the framework concept, believe a comprehensive inventory of our public forest lands, followed by study and recommendations overseen by a scientific panel is a reasonably good process. But that will take decades to complete. Meanwhile, the status quo – “stewardship” plans that prioritize development of ‘young forests’ while decimating mature forests-- would continue. This is not acceptable. We are in a climate crisis. We need our mature trees, and the next generation of trees they produce naturally. *That* is stewardship.

Finally, the framework contains many un-defined, or poorly defined terms that are open to interpretation, and therefore it is impossible to suggest that it constitutes the viewpoints of the majority of the participants.

I thank you for your kind consideration and service to the citizens of New Jersey.

Judy Kroll

541x

*I strongly oppose the NJ Forestry Task Force Report because it is extremely detrimental for all wildlife not to mention for our NJ forests as well and I'm confident many agree. I respectfully request that this not be considered. We need to protect the forests and not destroy them before we don't have any left at all and NJ has done an awful job of that over the years of eliminating so much of our beautiful forests which in turn has destroyed so much of wildlife's only habitat.*

*Maria Kucyna*

542x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,

543x

Mary Lagatol

544x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Thea Landesberg*

~

545x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. It will be detrimental to New Jerseys forests and wildlife, in particular, deer. Thank u. Patti Lane,

546x

To Whom It May Concern,

As a NJ resident, I oppose the NJ  
Forestry Task Force Report.  
It is bad for Wildlife and bad for forests.

I oppose the commercial sale of deer meat by hunters, known as market hunting.  
This horrific ask can not take place in NJ or anywhere in the US.

What has NJ become? An inhumane killing  
commercial market all for money???

I oppose the unthinkable act of deer market hunting in NJ and I oppose the entire NJ  
Forestry Task  
Force Report. What team made these recommendations? It is incomprehensible.

Thank you,  
Doreen Laury

547x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,

Cheryl Lechtanski

548x

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Catherine Lembo

549x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and it is bad for forests. It is a horrible use of our valuable resources and is an unnecessary and destructive attack on the resources and life we are blessed to share our environment with.

Thank you

Matt Leonard CIPP

550x

Dear Members of the Senate Environment Committee:

As a NJ resident living in a wooded area surrounded by public land, I write to oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for NJ's forests.

1. Deer are not the cause of destruction in NJ's forests. The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
2. It is unsafe to promote the donation of deer meat to food pantries. Meat from hunting is not inspected by the USDA and can contain lead shot, which is still legal for deer hunting in NJ but very dangerous if ingested by a human, especially a child. It is likely that pantries would have no interest in distributing this meat for these reasons.
3. Our public state forests belong to NJ residents and their wood should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, which is harmful to our state forests. Trees should only be removed on an individual basis for safety or disease reasons.
4. A "science advisory panel" including industry scientists should not be given so much discretion. Industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
5. Even hunters oppose the commercial sale of deer meat by hunters, known as market hunting. The hunting lobby itself opposes the report's proposal and says it is an inappropriate use of public land.
6. One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

For all of the above reasons, I urge you to reject the policy recommendations in this flawed report.

Thank you for your attention to this important matter,

Michelle Lerner

551x

I am vehemently opposed to the Report's proposals.

- **deer meat to food pantries** - a terrible idea - not inspected, could contain lead
- promotes hunting, killing, and wounding animals

- **demonizes deer while developers and logging companies continue destroying forests** - far more forest damage is from insects and jumping worms

- **wood from state forests should never be sold** - incentivizing tree cutting - should never be done in State forests

Stewart Lindenberger

552x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.  
Arline Lippin

553x

I am writing to express my opposition to the Forestry Task Force report.

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,  
Paul Lucente

554x

To Whom It May Concern:

My name is Marijane Lundt, and I . I am writing in support of the NJ Highlands Coalition Report. I am particularly concerned about the clear-cutting policy of public forest lands.

Not only am I aware of the value of mature trees as they related to carbon sequestration and the important role that mature trees play in the slowing climate change, but what happens to wildlife when their habitat is destroyed. Although, I have lived in New Jersey for 36 years I literally grew up in the woods of the Upper Peninsula of Michigan. I can never forget the horror I witnessed when a forest was clear cut. The animals had no idea what had happen and why. In my opinion the purpose of public forests is to provide a space where animals and humans can coexist and respect each other.

I also strongly believe that public forests are truly shared green spaces and that under no circumstances should be considered a commercial for-profit opportunity. I sincerely hope that the New Jersey Legislature will choose to consider all the residents of New Jersey including the wildlife.

Thank you for your consideration.

Marijane Lundt

555x

I oppose the aforementioned report as it is harmful to deer, especially, and the state's forests.

The deer and all of our wildlife require land, their God-given ecosystem, in which to thrive and survive.

In my personal experience, homeless persons do not care for deer meat.

Thank you for your consideration.

D. Lynch

556x

Dear Policy Maker,

I am a resident of Madison NJ in Morris County, a molecular biologist, an ecologist, an educator, and a concerned citizen. And I am worried about the NJ Forest Task Force recommendation to create young forest by cutting mature forest.

Once removed, mature trees will not simply come back. They will take many decades to return to the level of ecosystem services of a mature forest. They are an irreplaceable resource we should be protecting.

We must protect native, mature trees from invasive species and minimize fragmentation to help bring back lost species and retain existing species of insects, birds, and other animals.

We must retain large trees, and keep wood in the ecosystem for its carbon storage and habitat value.

Public forested lands in our crowded state are most valuable for their ecosystem services and carbon storage. It has been documented that mature trees sequester much more carbon than young trees.

And there are many, perhaps too many, patches of young forest already in NJ. And many small forest fragments as well. Yes, there are species of birds that require young trees and/or forest edges, but there is already more than enough habitat of that kind in NJ, and every major storm naturally fells old trees to create openings and make way for younger growth. Humans do not need to accelerate the process.

There is no need to destroy habitat for the birds and other species that need intact large areas of forest. We should not be continuing to fragment our forests. Instead we should be finding ways to connect forests and other natural areas to one another. That is, we should be creating more and more wildlife corridors, not barriers to wildlife movements.

Loss of wildlife habitat is exacerbated by replacing old forest trees with young. Birds in particular have declined drastically in New Jersey because of habitat loss. Further, New Jersey serves as a pathway northward for species, both plant and animal, to move and survive as their current habitat is lost to a warmer, drier, more fire-prone environment. Future shifts and losses have been modelled and mapped for native tree species by the US Forest Service and The Nature Conservancy, showing northern NJ to be a critical corridor for preventing extinctions.

I oppose stewardship plans that include removal of mature, native trees that are our best defense against climate change.

Please stop the practice of cutting down mature trees on our public lands. Preserving and protecting our old growth trees from deer and invasive species is our best climate defense!

Tree cutting on our mature, public forests is a horrible idea, resulting in loss of wildlife habitat, loss of carbon storage to fight climate change, and a decimation of what is left of our natural world.

Thank you,  
Joan Maccari

557x

I OPPOSE THE NJ FORESTRY TASK FORCE REPORT BECAUE IT IS BAD FOR THE WILDLIFE AND BAD FOR THE FOREST!!!! STOP SELLING OFF NJ!!!! LEAVE OUR WILDLIFE ALONE!!!

This isn't going to be the GARDEN state anymore.

Sandra Machtemes

558x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Sincerely,  
Marie Maclel*

559x

Please contact the New Jersey Senate  
Environmental Committee to let them know that  
you **oppose the NJ Forestry Task Force Report  
because it is bad for wildlife and bad for  
forests. I agree this is bad for wildlife and bad  
for NJ FORESTS. Barbara Maddalena**

Please stop Deer Market Hunting ; it's cruel and inhuman . Thank you Barbara  
Maddalena

560x

Jessica Maddox

I oppose the report.

This does not represent accurately. There are a number of points that do not represent a true reflection of what's actually happening and protecting our environment and animal welfare. As well as protecting the land our wildlife lived on long before we humans took over and continue to take over.

I strongly agree with all the highlighted points below.

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

I will continue to stand strong for our wildlife and our environment. This report is skewed.

Citizen against this report.

Jessica Maddox

561x

Dear Environmental Committee,

The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

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Sally Malanga

562x

1. Key points in Frontiers article (by Nathan Cornell, sent by Joan Maloof):

- For thousands of years before European settlement, vast “primary” forests were inhabited by a thriving Native human population and harbored many exceptionally large trees, and ecosystems that would be characterized as “old-growth” today (Lorimer, 1977; Whitney, 1994; Lorimer and White, 2003). Up to 90% of the Northeast was covered by such forests, and dominated by shade-tolerant and moderately shade-tolerant species (Foster, 1995; Cogbill, 2000; Cogbill et al., 2002; Shuman et al., 2004; Thompson et al., 2013; Foster et al., 2017; Oswald et al., 2020b)...
- ... Old-growth forests in the East include sites with trees more than 380 years old, established in the 1640s and earlier (Lorimer, 1980; McCarthy and Bailey, 1996; Abrams et al., 1998; Abrams and Copenheaver, 1999; Pederson, 2013; Heeter et al., 2019), and studies of remnant old-growth stands indicate they are adapted to long-intervals between catastrophic disturbances...
- Old-growth forests not only have a high degree of structural diversity, but also contain a wide variety of tree species, herbaceous plants, insects, mosses and fungi, and deep, carbon-rich soil with an associated soil microbiome (Frelich, 1995; Davis, 1996; Lapin, 2005; D’Amato et al., 2009; Maloof, 2023)...
- Openland and early-successional habitats were not common before the arrival of Europeans in the Northeast or Upper Great Lakes (Cooper-Ellis et al., 1999; Foster et al., 2002; Faison et al., 2006; Anderson et al., 2018; Oswald et al., 2020b; Frelich et al., 2021). Early-successional habitats characterized about 1–4.5% of the Northeast, with greater amounts in coastal pine barren communities of Cape Cod, Long Island, and New Jersey (Lorimer and White, 2003)...
- The arrival of Europeans generated a radical landscape transformation. Upland areas, densely forested for thousands of years, were cleared for agriculture and kept open by crop cultivation, cattle and sheep grazing, increased burning of (dry) cleared land, and intensive use of remaining woodlands (Foster and Motzkin, 2003; Faison et al., 2006; Rhemtulla and Mladenoff, 2007; Scheller et al., 2008; Curtis and Gough, 2018; Oswald et al., 2020b). By the height of deforestation from 1850 to 80, 30% of northern New England and 40–50% of southern New England had been cleared (Foster et al., 2017)...
- Widespread deforestation caused a major shift in vegetation from long-lived and interior forest species to generalist and early-successional species (Thompson et al., 2013; Foster et al., 2017). Many of the latter species had been uncommon before European settlement, others migrated to the region, and some plants that had previously grown only on extreme and rare sites expanded their distribution and became common “old field” species (Marks, 1983). Early naturalists recognized that populations of some wildlife species had increased greatly due to this abundance of human-created early-

successional habitats (Peabody, 1839). By the late 19th century, New England agriculture was declining, leaving countless abandoned and overgrown fields, grasslands, heathlands, and shrublands, as well as old-field white pine forests, and dense sprout woodlands. By the mid-20th century, significant areas of cutover forests were acquired by the public and allowed to begin growing back on state and federal lands (Titus, 1945; Jones, 2011; Knowlton, 2017). Today, millions of acres of forest are a globally significant example of ecological recovery, and the extent of early-successional habitats has declined accordingly (McKibben, 1995; Foster et al., 2002; Litvaitis, 2003; Foster et al., 2017). Consequently, species that depend on early-successional habitats have been returning to more historic levels, including the Bobolink (*Dolichonyx oryzivorus*), Eastern Meadowlark (*Sturnella magna*), Golden-winged Warbler (*Vermivora chrysoptera*), Yellow-breasted Chat (*Icteria virens*), and New England Cottontail (*Sylvilagus transitionalis*) (Figure 1; Litvaitis, 1993; Foster, 2002; Askins, 2011; Foster, 2017).

- (Currently) In the Northeast, forests older than 150 years of age cover only about 0.3% of New England and 0.2% of the Mid-Atlantic region (USDA Forest Service, 2022b). Old-growth forests cover a scant 0.06% of Connecticut (Ruddat, 2022). A Massachusetts survey found a mere 1,100 acres of old-growth forest in 33 small stands, comprising just 0.02% of the land base (D'Amato et al., 2006). Most of the old-growth forest in the Northeast is found in the Adirondack and Catskill parks in New York (Dunwiddie et al., 1996; Davis, 2003; Keeton et al., 2011; New York Department of Environmental Conservation, 2021)...
- It is important to recognize that documentation of the decline of early-successional species is almost invariably based on a very recent baseline, generally dating to the 1960s or later (DeGraaf and Yamasaki, 2003; Massachusetts Audubon Society, 2013; North American Bird Conservation Initiative, 2014; Rosenberg et al., 2016, 2017, 2019; Connecticut Department of Energy and Environmental Protection, 2019; Sauer et al., 2020; Littlefield and D'Amato, 2022). This time period is a convenient benchmark because it falls within the lived experience of many of today's wildlife and forest managers and the landowners and public that they are trying to reach. It also coincides with the first annual North American Breeding Bird Survey (BBS), which took place in 1966 (Sauer et al., 2013). Prior to this time there was little reliable quantitative information on most bird populations (Foster, 1995; Foster et al., 2002; Dunn et al., 2005).
- A further problem is that forest-clearing advocates exaggerate the number of species that "require" or "need" early-successional habitat. For instance, the YFI (Young Forest Initiative) website asserts, without evidence, that, "if we fail to actively create and renew young forest...[m]any songbirds will rarely be seen or heard [and] the New England Cottontail and Appalachian Cottontail could...go extinct (Young Forest Project, 2022c). Another YFI publication

claims that, "more than 40...kinds of birds need young forest..." ([Fergus, 2014](#)), yet only 12 species of birds in the Northeast are actually considered early-successional forest specialists ([Askins, 1993](#)).

- Among the species most commonly cited to justify large-scale forest-clearing are the American Woodcock, Ruffed Grouse, Golden-winged Warbler, and New England Cottontail. As discussed in detail in [Supplementary 3](#), whether this strategy is necessary or desirable is open to question for each of these species. For example, the woodcock ([Seamans and Rau, 2018](#)), grouse ([Wiggins, 2006](#)), and cottontail ([Fuller and Tur, 2012](#)) are game species subject to being killed by hunters while the cause and potential solutions to warbler declines are uncertain ([Streby et al., 2016](#)).
- ... Overall fire activity spiked after forest-clearing by European settlers created dry and flammable early-successional habitats, spiked again in the late 19th and early 20th centuries with the expansion of fire-prone abandoned farmlands and cutover forests, and has dramatically declined in the last century ([Ireland, 2013, 2014](#); [Frelich et al., 2021](#)).
- ... Historical data and pollen studies indicate that before European settlement, forests were mainly characterized by long-lived shade tolerant and moderately shade tolerant species, not fast growing, early-successional and weedy species that would indicate widespread Native burning ([Russell, 1983](#); [Foster et al., 2002](#); [Motzkin and Foster, 2002](#); [Parshall and Foster, 2002](#); [Parshall et al., 2003](#); [Faison et al., 2006](#); [Shuman et al., 2019](#); [Oswald et al., 2020b](#))...
- In summary, current understanding of the role of fire and other disturbances in the Northeast and Upper Great Lakes regions before the arrival of Europeans is based on uneven, area-specific, and often-inconclusive information ([Oswald et al., 2020a](#); [Frelich et al., 2021](#)). Available evidence does not support the hypothesis of widespread, intensive, ongoing burning and other land management over millennia by Native people ([Cachat-Schilling, 2021](#)). Instead, the evidence points to human use before European colonization limited to areas near settlements and ultimately constrained by a regional human population that is estimated to be less than 1% of the present population ([Milner and Chaplin, 2010](#)).
- ... Most important, forests that are relatively even-aged will transition on naturally toward old-growth and uneven-aged condition if simply left alone ([Gunn et al., 2014](#); [Catanzaro and D'Amato, 2019](#)).
- Numerous rare, threatened, and endangered wildlife species depend upon mature and old-growth forests and their ecosystem services. These species include migratory birds such as the Cerulean Warbler (*Setophaga cerulea*) ([U.S. Fish and Wildlife Service, 2006](#); [Dawson et al., 2012](#)) and Wood Thrush (*Hylocichla mustelina*) ([Bertin, 1977](#); [Hoover et al., 1995](#); [Rosenberg et al., 2003](#)). They

include mammals such as the Eastern Spotted Skunk (*Spilogale putorius interrupta*) ([Lombardi et al., 2017](#); [Hassler et al., 2021](#); [Pearce et al., 2021](#)), Appalachian Cottontail (*Sylvilagus obscurus*) ([Chapman et al., 1992](#)), Northern Long-eared Bat (*Myotis septentrionalis*) ([U.S. Fish and Wildlife Service, 2022a](#)), and Allegheny Woodrat (*Neotoma magister*) ([Balcom and Yahner, 1996](#); [Lombardi et al., 2017](#)). They include plants such as Butternut (*Juglans cinerea*), ([Schultz, 2003](#)), Canada Yew (*Taxus canadensis*) ([Dunwiddie et al., 1996](#); [Windels and Flaspohler, 2011](#)), Fraser Sedge (*Cymophyllus fraserianus*) ([Godt et al., 2004](#)), and American Ginseng (*Panax quinquefolius*) ([McGraw et al., 2013](#)). Some species reach their highest densities in old-growth forests, including southern and northern flying squirrels, forest interior birds, and spring ephemeral wildflowers.

- ... Clearing established forests can also introduce and spread invasive and non-native species that ultimately reduce biodiversity ([McDonald et al., 2008](#); [Eschtruth and Battles, 2009](#); [LeDoux and Martin, 2013](#); [Coyle et al., 2017](#)). Managed forests have been found to have as much as three times more invasives than fully protected national parks or wilderness ([Riitters et al., 2018](#)). Invasive plants can have a negative impact on native animal populations, including birds, mammals and other vertebrates ([Fletcher et al., 2019](#)). Invasive earthworms are a serious concern, particularly the new threat of jumping worms (*Amyntas* spp.) that destroy forest soil very rapidly ([Frelich et al., 2019](#)).
- The amount of carbon lost when cutting a mature or old-growth forest is not recovered by fast-growing young forests for many decades to well over a century ([Harmon et al., 1990](#); [Aalde et al., 2006](#); [Krebs et al., 2017](#)). One study found almost no net carbon accumulation for 15 years after clearcutting—currently a critical time window for reining in global greenhouse gas emissions ([Hamburg et al., 2019](#)). In some cases, older forests are accumulating more carbon as the climate warms ([Finzi et al., 2020](#)), they are better able to withstand physiological stress, and they are also more resistant to the stress of climate change than younger forests, particularly regarding carbon storage, timber growth rate, and species richness ([Thom et al., 2019](#)). Soil accounts for approximately 50% of total ecosystem carbon storage in the Northeast, with mineral soils comprising the majority ([Fahey et al., 2005](#); [Petrenko and Friedland, 2015](#)). Forest-clearing can mobilize and release soil carbon for decades ([Nave et al., 2010](#); [Petrenko and Friedland, 2015](#); [Lacroix et al., 2016](#)). It can take from 60 to 100 years for soils on a site to recover from clearcut logging ([James and Harrison, 2016](#)).
- ... Logging accounts for about 86% of the carbon emitted by U.S. forests each year—far greater than insects, storm damage, fire, development and other uses combined ([Harris et al., 2016](#); [Duveneck and Thompson, 2019](#)). Although a small percentage of the carbon in trees that are cut is stored in durable wood products, in the U.S. about 76% of carbon in trees cut for timber is released

into the atmosphere each year ([Domke et al., 2018](#)), with most of it emitted quickly in processing, waste, and short-lived products ([Harmon et al., 1996](#); [Ingerson, 2011](#); [Harmon, 2019](#); [Leturcq, 2020](#)). A logged mature forest stores less than half of the carbon of an uncut mature forest, even if carbon stored in wood products is included in the carbon storage total of the logged areas ([Nunery and Keeton, 2010](#); [Law et al., 2022](#)). Impacts are similar for forest-clearing to produce wood bioenergy, which advocates claim is “carbon neutral” ([Collins et al., 2015](#)). However, cutting and burning trees releases large amounts of carbon immediately that would take many decades to be recover—if the forest grows back. In addition to other disrupted biophysical processes, this is time we cannot afford in light of the urgent climate crisis ([Schulze et al., 2012](#); [Law et al., 2018](#); [Sterman et al., 2022](#)). In short, clearing forests—whether for early-successional habitat or bioenergy—results in serious impacts to the atmosphere. In terms of maximizing carbon accumulation, allowing forests to regrow and remain standing—termed proforestation—is demonstrably preferable to cutting them ([Buotte et al., 2019](#); [Moomaw et al., 2019](#); [Mackey et al., 2020](#); [Rogers et al., 2022](#)).

- In contrast, clearing forests to expand early-successional habitat can threaten human health. For example, it provides optimal habitat for White-tailed Deer and White-footed Mouse (*Peromyscus leucopus*)—the most competent hosts for the vector of Lyme disease, the Eastern Blacklegged Tick (*Ixodes scapularis*) ([Allan et al., 2003](#); [LoGiudice et al., 2003](#); [Levi et al., 2012](#); [Telford, 2017](#); [DellaSala et al., 2018](#); [Robertson et al., 2019](#)). There were 185 deaths from auto collisions with animals in 2019 and an estimated 2.1 million animal collision insurance claims in 2020–21, up 7.2 percent from the previous year, with most collisions involving deer ([Insurance Information Institute, 2021](#)).

**I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.**

The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Best regards,

Phyllis Mandelbaum  
Life-long NJ Resident

568x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests and for the following additional reasons:

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

569x

- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Lorraine Marozzi

570x

Dear Sir or Madam:

I would like to register my opposition to the NJ Forestry Task Force Report, which is set to be voted on today.

I support the maintenance of New Jersey's beautiful forests and absolutely reject the idea that more trees should be cut down for economic benefits (short-term gains, for sure, as our climate is changing and the need for trees is ever greater).

I also support the humane and ethical treatment of our deer population. Yes, I agree that this population needs to be controlled but -- there must be another way to decrease the deer numbers without hunting. We are a society that has progressed beyond the need for culling via shotgun or bow and arrow.

Please consider my comments. Thank you.

Pat McKee

571x

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.  
Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.
- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.
- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Katya McKnight

572x

To the Senate Environment Committee

I would like to record my opposition to the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

My name is Nisha Menon and I reside at

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Please do the right thing. In every way that matters, the deer are just like us. They feel fear, pain, joy and want to live. This world is as much theirs as it is ours. We need to find a better way to coexist

Thank you

573x

Sir,

*I oppose the NJ Forestry Task Force Report because it is cruel toward deer and other wildlife. Please stop promoting and sanctioning the killing of these loving, innocent deer and others. It is traumatizing, to say the least.*

*I urge you to please look at this from a humane perspective.*

Rajendra Menon

574x

To: Senate Environment Committee

Dear Committee Members:

We oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Thank you in advance for considering our opinion.

Sincerely,  
Cheryl & Robert Miller

575x

Dear Senate Environmental Committee:

I live near to many towns that are or have overdeveloped the land.

Essentially every woodland is being developed for homes or businesses

While strip malls and previous stores are abandoned and huge parking lots remain empty.

These smaller woodlands and handful of trees left are scraped away all the animals are homeless nothing left. Where do they go?

They end up in neighborhoods trying to survive and then people complain and say things like "the deer are a nuisance". You take their home then blame them for trying to survive.

Now you want to destroy their actual home in the forest?!

Logging for wood for profit is there no end to the greed in NJ?

Timber sales and deforestation is death to Nature and the wildlife therein.

Tell Senator Smith this is a terrible idea, all he will accomplish is untold suffering to wildlife. I oppose any violence to God's creation which includes not just humans.

Many will suffer for a few gold coins. I vehemently oppose this task force.

Thank you,  
Julie Miller

576x

Dear Senate Environment Committee,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Thank you.

Janice Mondoker

577x

To the Senate Environment and Energy Committee,

Please note that I am opposed to the Forestry Task Force Report. Hunting is already an available sport in NJ. I lived in Morris County for 40+ years and now in Somerset. We hardly need to promote hunting any further. I contended with the deer and the occasional bear sighting (only one in 30 yrs in Randolph). I did not feel safe on the Randolph Trails each yr during bow season and had to wait until late winter to use them again. In Ironia I had to keep my kids out of the woods (Black River Preserve) even in the summer. What possible reason is there to cut down wood, other than ash? Does anyone want venison that is non-USDA inspected. Many of these proposals make no sense. Please explain further.

Sincerely,

Leslie K Moran, Ph.D.  
Psychologist (retired)

578x

I strongly oppose the above report. It is needlessly dangerous for deer and the future of our forests. As always, the motive for these policies is private profit and hunters' callousness. Enough!

Barbara Moretti

579x

**Sent:** Thursday, March 9, 2023, 06:12:09 PM EST

**Subject:** NJ Forestry Task Force Report

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*James J Morrison*

580x

Hello,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. We do not have enough open space now and animals have nowhere to go as humans encroach on their territory. Food pantries do not want to receive deer meat that has not been inspected by the USDA. The Task Force will be telling us, the taxpayers, how the open space will be managed, and that is unacceptable.

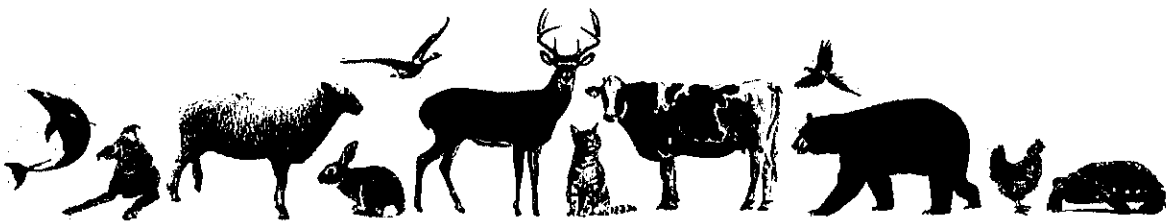
Sincerely,

Corinne Moshman

581x

save nature and wildlife from the depths of the nj dep and their vicious attacks on nj animals! that are only trying to stay alive. shooting them is deplorable

# Animal Protection League of NEW JERSEY



Dear Jeane,

Please speak up for NJ deer and forests by opposing the NJ Forestry Task Force Report. Comments must be submitted to the Senate Environment Committee at [OLSaideSEN@njleg.org](mailto:OLSaideSEN@njleg.org).  
**DEADLINE: 5pm on Wednesday, March 15.** Be sure to include your name and address.



582x

If you are short on time, all you need to say is:

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important talking points:

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and

could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

**DONATE NOW**

Animal Protection League of New Jersey | PO Box 186, Glen Gardner, NJ 08826

[Unsubscribe jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)

[Update Profile](#) | [Constant Contact Data Notice](#)

585x

Sent by [janine.motta@-f...](mailto:janine.motta@-f...)



586x

Dear Senate Environment Committee,

As a NJ resident, I strongly oppose the NJ Forestry Task Force Report. This report is dangerous and detrimental to New Jersey's forest and wildlife (deer).

The Report does not represent a consensus of the task force members. The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats. Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests. Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat. Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

Thank you,

Kim Nagelhout

587x

Hello,

Jumping worms are listed as an invasive animal species in New Jersey and many other states because of their potential to dramatically harm forest ecology and reduce biodiversity. According to researchers, jumping worms alter soil structure more than any other worm. Jumping worms can cause soil conditions to deteriorate substantially. They outcompete other earthworm species and feed in mass numbers in the top layer of soil, consuming organic material and replacing it with their castings.

Plus, they alter the composition of the soil, creating a texture that's often compared to coffee grounds. The modified soil is ruined for many native plants, as it's stripped of vital nutrients and prone to increased erosion. The worms can even cause challenges for casual gardeners. Homeowners may see garden plants killed and may have difficulty growing plants. STOP BLAMING DEER!!!!!!

**I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.**

A Penn State-led research team discovered evidence that browsing by white-tailed deer had relatively little long-term impact on two tree species in a northern forest.

The research is important because deer herbivory has a reputation for suppressing tree seedling development in northern hardwood forests, noted research team member Marc McDill, Penn State associate professor of forest management. For two decades his lab in the College of Agricultural Sciences has been studying forest management planning and economics, forest growth and yield modeling, and oak regeneration.

"In this study, deer had no discernible influence on height growth or survival of either sugar maple or ash seedlings," he said. "The truth is that seedlings in Northern hardwood forests respond to a complex of environmental factors in addition to deer herbivory, such as light availability, soil quality and competition from understory vegetation like blackberry."

"Our study showed that seedlings were more greatly influenced by light availability, size attained before gaps were created and soil nitrogen than deer browsing," Jones said.

"Seedling growth was slow under even the best circumstances — as is typical in a northern forest — and gap capture was attained by saplings that responded more vigorously to gap creation."

<https://www.psu.edu/news/research/story/deer-browsing-just-one-many-factors-shaping-north-american-forests/>

Thank you,  
Kim Nagelhout

588x

Hello,

I strongly oppose the NJ Forestry Task Force Report.

A Penn State-led research team discovered evidence that browsing by white-tailed deer had relatively little long-term impact on two tree species in a northern forest.

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<https://www.psu.edu/news/research/story/deer-browsing-just-one-many-factors-shaping-north-american-forests/>

We must stop blaming deer. The focus needs to be on how humans are destroying our forests and ecosystem. Humans cause the most harm to our planet. Deer are fellow sentient beings that deserve our compassion and respect.

Thank you,

Kimberly Nagelhout

589x

Dear Senate Environment Committee Members:

I oppose any New Jersey Forestry Task Force (NJFTS) recommendations that involve “managing” wildlife populations by killing. I also oppose any NJFTS recommendations that involve managing land that will result in managing wildlife populations by killing.

Deer love “edge” habitat. The hunting community and gun lobby obviously know this. They work hard to implement policies that promote more hunting and weapon sales. One way is to make deer the villains and then create more edge habitat that deer love.

The playbook has always been:

- Install pro hunt/pro gun politicians in office
- Team up with some naturalists & audubon groups to seem more legitimate
- Make bad decisions with bad intentions driven by money.

Some naturalists should be more responsible and look at ALL factors that impact forest health. Look up aphids and spider mites to name a few.

Some Audubon groups should be more responsible and educate members about how birds impact tick populations and tick borne diseases. Look up migratory birds and ticks.

Some politicians should be more responsible. Please STOP wasting taxpayer time and money by promoting killing wildlife by blaming them for our problems.

There are many resources / studies that show many things impact forest health. A recent Penn State study showed deer had no impact on some types of trees.

It’s time to STOP blaming the victims to promote our selfish & greedy agenda of killing wildlife for money.

Anyone in government that doesn’t speak out against hunting also supports the gun lobby.

Thank you for your time.

Mark Nagelhout

590x

Dear Senate Environment Committee,  
I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad  
for forests.

Sincerely,  
Julie O'Connor, PhD

591x

I vehemently appose the NJ Forestry Task Force Report because it is bad for the wildlife and bad for the forest!!

Deer have been around for 20 million years. They never distorted the forest. On the contrary, they have left us the most amazing ancient forests to enjoy, with it's diverse majestic tall trees, living in perfect harmonious symbiotic relationship for us to admire, injoy & be at awe at God's creation.

Then came greedy men who can't get enough of killing, destroying & plundering for the all mighty dollar!! Not for them or anyone else to enjoy & leave nothing for future generations!.

Today it's not just the deer, it is also people who are damaging the planet & the environment. The Globalist want to CULL humans as we speak!!

Why don't we be thankful for what God gave us to enjoy, respect one another, our planet, with all that live within it! That includes plants, trees & animals. All that is in the univers for our enjoyment & for future generations!

Live & let live. Enjoy & let others enjoy.

When you destroy one, you destroy all!

God created the universe to trives on a natural symbiotic balance. It is not for us to destroy!

I Implore you, please respect it for all to cherish & enjoy!.

Sincerely,

Heripsime Ohanian

592x

*To the Senate Environment Committee:*

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Sincerely,  
Brian Ostering*

593x

Hello,

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

The Report consists of 16 proposals and is 274 pages long. It is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer. The Report is dangerous for other reasons as well:

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a "science advisory panel."** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you.

594x

Patti Packer

595x

The NJ Forestry Task Force Report is a huge disappointment. As a lifelong citizen of this state, I feel it is imperative that we preserve both wildlife and the forests that wildlife depends on. This report throws both under the bus through its lack of support for the most vulnerable of our residents (wildlife) and exploitation of our natural resources (that belong to *all* of us) for human greed. Disgusting.

Carol Paszamant

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596x

*We oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Anthony & Tricia Peloso*

597x

***I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Deer are being blamed for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.***

***Sincerely,  
Alex Perla***

--

*[Faint signature]*

*[Faint text]*

*[Faint text]*

598x

***I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Deer are being blamed for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.***

***Sincerely,  
Laurie Perla***

599x

Sincerely,  
Michael Perla

[illegible]

600x

Att: Senate Environment Committee,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

It is detrimental to New Jersey's Deer. It blames deer for deforestation when insects and invasive jumping worms have caused far more damage.

Promoting deer meat to food pantries is irresponsible. It is not inspected by the USDA and could be contaminated and contain lead shot.

Wood from State Forests should not be sold under any circumstances. This would destroy our forests.

The report wants to put forest management in the hands of the NJDEP. The NJDEP is widely known to ignore public comments.

The commercial sale of deer meat by hunters is an inappropriate use of public land.

The report does not represent a consensus of the task force members and other environmental groups.

Please oppose the report. We need to sustain what forests and wildlife we have left.

Thank you.

Elizabeth Petersen

601x

To whom this may concern:

My name is Amanda Picker of \_\_\_\_\_ and I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Please take this into consideration.

Thank you,  
Amanda Picker

602x

Your "report" is biased towards businesses and such entities, and not in the interest of the environment, animals, or the truth. It is dangerous and unacceptable!

~\*Kristin Star Picun\*

603x

I am vehemently opposed to the task force's proposal; I disagree with the management objectives and the priorities.

Janet Pizar

604x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Kelly Pladeck*

605x

To Whom It May Concern:

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.
- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.
- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against

the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,

Maureen Porcelli  
NJ Citizen

607x

I am strongly opposed to the report because it is detrimental to the ecology and terrible for wildlife.

Patricia S. Porter

608x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Robert Puca

609x

I OPPOSE THE NEW JERSEY FORESTRY TASK FORCE REPORT – it is a detriment to WILDLIFE and for the FORESTS. Please record my opposition.

A concerned New Jersey citizen:

JOHN RADZNIAK

610x

I OPPOSE the NJ forestry task force report

I OPPOSE the commercial sale of deer meat ( market hunting)

L. Ralph

Sent from my iPad

611x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Unfettered construction is currently decimating the undeveloped parts of most cities in NJ. That means cutting down trees and adding more cars and human activity to an already overburdened state.

The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch. These are the groups that want to preserve the open land this state so desperately needs.

The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects like the lanternbug and invasive jumping worms have caused far more forest damage.

Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests. Especially now with the climate crisis only getting worse.

Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

Sincerely,

612x

Joann Ramos

10/10/2023

613x

To whom it may concern;

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

This is a dangerous report as it will be used by Senator Bob Smith (who authorized the Task Force) to craft legislation that will be detrimental to New Jersey's forests and wildlife, in particular, deer.

These are the important concerning points:

- The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Sincerely,

614x

Leah Reedy

--

Leah Reedy M.S., CCC-SLP

615x

Good afternoon,

Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch. Thank you.

John Rello

616x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. A few reasons are: The Report demonizes deer while developers and logging companies continue destroying forests. Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. The favor of your reply is requested.*

*Joy Rizzo*

617x

To the Senate Environmental Committee,

*Please include my comment: I adamantly **OPPOSE the NJ Forestry Task Force Report** because it is bad for wildlife and bad for forests!*

*Thank you,*

*A concerned lifelong resident of NJ,*

*Martha Romano*

618x

Dear Senate Environment Committee,

I am writing because I oppose the NJ Forestry Task Force Report with its 16 proposals that will be detrimental to New Jersey's forests and wildlife — in particular deer. Whenever man interferes with nature, it always seems things go awry, and I don't expect these proposals will make any difference in result, but rather will cause more damage and destruction to our state lands.

Developers and logging companies will say and do anything to increase profits and production, even if it means the ruination of our much needed forests, especially today with rising temperatures. The Report claims deer are to be blamed for deforestation when in fact, other invasive organisms are to be held accountable, e.g. the lantern fly for one. And dead or decaying wood needs to remain on state land, as it provides homes, shelter, and food [in the way of] insects for wildlife. Industry scientists do not care about animals or birds, but rather would support an increase in timber sales that will only add to the destruction of these wild habitats and increase the interest in more logging. It is these groups that are destroying our state forests, not deer.

When it comes to deer population control, hunting is not effective as is evident from over the years of deer population increases. When nature takes action, that's when deer populations stabilize, or even decrease. This up and down cycle is ongoing based on food availability, not hunting.

While one of the proposals is to donate deer meat to food pantries, it has not taken into consideration that this meat is not inspected by the USDA and may even contain lead shot! I doubt that food pantries want to take on the responsibility of someone becoming ill from this meat, therefore won't even accept it for distribution. And when it comes to the commercial sale of deer meat, both hunters and non-hunters oppose the Report's proposal saying it is an inappropriate use of public land. I totally agree with them.

So when it comes to the NJ Forestry Task Force Report, I say leave our state forests and deer alone, they will take care of themselves and not cost us one red cent.

I hope my comments don't fall on deaf ears, but rather are taken into consideration on the matter of this Task Force Report.

Respectfully,  
Linda Rossin

619x

Members of the NJ Senate and Assembly Environmental Committees and Staff,

The following statement(s) as it relates to the New Jersey Forest Task Force Report (NJFTFR) are solely mine. I submit them as a professional senior ecologist working with a premier environmental consulting firm in New Jersey for the past 38 years. During this time I have worked for both the public and private sectors providing endangered and threatened species surveys, land use compliance consultation, and ecologic restoration planning. These comments do not represent those of any other group or entity. These comments are solely my own after attention to all sides of the issues.

From direct communications with others from the task force and visitation to sites that have been logged, post 1-year up to 8 years, the type of practices that involve modified seed harvest, aka, almost complete deforestation, although making early successional forest in the short term, does not succeed back to the full spectrum bio-ecologic nexus that only long periods of time can manifest. This is especially true of forest interior mosaics where specific communities of biota can only operate sustainably under the protection of surrounding buffer forest habitat. It is my assessment that the trade off to create habitat for one guild suite of a specific biodiversity is not on even par with an already established interior forest guild suite of flora and fauna. The young forest proponents argue, I believe incorrectly, that the ecologic math works because early forest communities are in severe decline across geographic spatial scales. I assert that if it's, "not broke, don't try and fix it". Especially when the land that is being dramatically changed already harbors stenopic (a fancy way of saying very specific species with finely tuned habitats and ecologic conditions) species.

It is a self-fulfilling prophecy that forest interior species will supplant the early young species as the next group on the "we need to fix it" list if we proceed in this manner. A fix that itself will require intensive human intervention to adaptively manage back to health. Under this lens I believe that the NJFTFR is short-sighted for not considering the full ecologic economics of its approach in managing forests. The goal of any state edict to manage our public trust forests should always be squarely focused on bio-ecologic maximums, not any one species, or group of species where the cure is worse than the disease.

Thank you in advance in consideration of these brief comments.

Sincerely,

Blaine Rothauser



620x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Julie Sacco

621x

To Whom It May Concern:

On behalf of my wife, three adult children, and their spouses, I want to express our opposition to the NJ Forestry Task Force Report, which includes among its 16 proposals, several that are deleterious to the interests of nature-loving NJ residents, both human and non-human alike.

It is our understanding that the report does not express the consensus opinion of task force member organizations, accommodating instead special interests prioritizing mercenary objectives.

The task force needs to be more transparent with voters.

Not doing so is a failure of government.

Sincerely,

Jan Schwartz

622x

I strongly oppose the NJ Forestry Task Force Report for a number of reasons. It is ridiculous to attribute the destruction of forests to deer when it is so obvious that development is by far the reason. Also, to promote the use of deer meat obtained from hunting as food is a blatantly unsafe practice.

Best to leave the remaining forests and deer alone.

Mary Sepede

623x

To NJ Senate Environment Committee (Email: [OLSaideSEN@njleg.org](mailto:OLSaideSEN@njleg.org))

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. I suggest that you read the individual comments included in the Report from all those participants who disagree with it's recommendations. (Appendix C, starting on pg 30.) That will show you the extent of misinformation, and bias inherent in the Report's construction and suspected predetermined conclusions, as perceived by those who participated directly in the process (Which I did not!) I credit the Task Force Co-Chairs for including the dissenters' comments in the document at all. I urge the Environment Committee to read what the dissenters have to say about the process and the resulting recommendations. You will never get that valuable insightful perspective by reading only the core of the Task Force report itself. Here's just one example (of many others) of what you will find in Appendix C and might otherwise miss: From Page 60, from Timothy McKenna, a self described executive with 25 yrs of experience in the paper and forest products industry:"*

Timothy McKenna

25 years as an executive in the paper and forest product industry

While there are a number of valuable recommendations in the NJFTF

Framework" particularly the

recommendations that the state DEP develop regulations governing forests and conduct an inventory of

our public forests" the Framework presents a problem for those whose highest goal is to foster and

preserve mature forests on New Jersey's public lands. Those of us on the conservation side of the issue

believe that the crucial task is to halt current damage to our public forests created by logging and tree

removal. The current framework leaves many of the critical concepts such as active management,

protection and reforestation loosely defined such that they can be interpreted to justify the current

status quo in NJ forests which most Task Force members oppose. Furthermore, the NY-NY Trail

Conference, which I represent, strongly believes that our public forests, in a small, densely populated

state, were set aside for the good of the public and those forests should be allowed to flourish in their

natural state to provide recreation and appreciation of nature for as many as possible. As a former

executive in the forest industry, I fully recognize there is a need for wood products and for cultivating

tree farms that supply those products. However, I am also convinced that in New Jersey in natural areas

624x

set aside for the benefit of the public the highest and best use is to leave the forests in their natural state. I respectfully submit our comments and am grateful to the leaders and the Senator for establishing the task force, but I am convinced there is more work to do.

NJFTF

*I agree with and trust the dissenters, both individuals and organizations, not those I see as the appointed special-interest engineers of the outcome.*

*Roberta Shields*

625x

.....because it is PURPOSEFULLY engineered to be wildlife and forestry detrimental.

16 proposals in the report? 16 proposals baked into the report that will accomplish what the legislator who "created" the report wants to accomplish:

1. Deceitfully demonizes deer. The report obscures the fact that builders, developers, strip malls, condo companies, and the like are continuing to devour NJ forests.
2. Report deceptively blames deer for declining forests ....INSTEAD OF.....insects and invasive jumping worms.
3. Lipstick on a pig? That's the virtue theater or virtue signaling of giving deer meat to food pantries. "Hear underprivileged person, eat some deer meat that is unregulated and may contain lead from lead shot poisoning." Food pantries are declining deer meat donations. Hunters are entertaining in their effort to decorate their sport with pretty clothing. This behavior and reason alone should negate the entire report given this overt effort to "Pull the wool over your eyes."
4. Selling the wood from our forests - the report says is a great idea. Any person with half a brain recognizes we should be ...PLANTING....trees, not commodifying them. We taxpayers financed this research?
5. NJ is recognized as tank farms and the Turnpike. The "Garden State" is a giggle pretty much everywhere. Every aspect to repair the state's image counts which is why hunters, non hunters, and hunting lobbies oppose the sale of deer meat.

6. And finally.....ONE THIRD OF THE PEOPLE WHO **CREATED**  
THIS REPORT ----- O P P O S E I T.

Respectfully,

*Jeff Sickles*



627x

Senators:

First and foremost: I oppose the NJ Forestry Task Force Report as presented. It is bad for our wildlife, bad for our forests BUT good for commercial ventures who would take advantage of our public lands.

Some specific objections:

a. Deer are not the only or even the major cause of deforestation. There apparently are other species that cause equivalent damage--as well as developers and logging companies who would love to take our public lands.

Clearcutting of swaths of forests does no good except for hunters ... of deer, bear and other wildlife--and loggers.

b. Promoting deer meat for food pantries does not seem to be a good idea. Limited inspection of the meat, chance of lead shot, other diseases. Hunters are free to gamble on the meat, but why foist it on unsuspecting hungry people? Similarly, commercial sale of deer meat (i.e., market hunting) should not be considered on public land. Recreational hunting is bad enough for our forests, the wildlife there, and the citizens of New Jersey who would like to explore our lands PEACEFULLY.

c. Our forest wood should not routinely be sold for profit, neither by the state nor commercial entities. That very idea makes it attractive to commercial AND POLITICAL parties and taints any program intended to protect and develop our forests.

d. I understand that a significant portion of the Task Force participants oppose the Report. The public should be made aware that this Report is far from a consensus of those who participated. Of particular concern is the opposition by the well-respected Highlands Coalition.

e. Finally, past history has demonstrated that the NJDEP has a history of ignoring public comments AND SUGGESTIONS. They should not be the ones developing forest management plans for public lands. The NJDEP has a conflict: forests or wildlife. Clearly they have not done a good job on wildlife. The deer population remains huge (for hunters?) while 25,000+ deer still die each year on our roads. Meanwhile the NJDEP is unable to estimate the black bear population within a factor 2 (3000 or 1500?).

Thank you for giving me the chance to present my views.

Herbert Skovronek, Ph. D.

628x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

it would be a mistake to open up our state forest to commercial logging, and deer hunting. Those profiting will become entrenched lobbying crony capitalists and sound decision-making will be affected by it. I am a staunch defender of capitalism, warts and all.

We should not commercialize our native wild animals and trees. I live on the border of forests across from the Wanaque wildlife refuge, in Hewitt and Awosting woods on the other. I have not seen an over abundance of deer. I have been here 31 years. Once commercial interests become entrenched in the decision making and exploitation of our natural forest resources good stewardship will fall by the wayside. Corners will be cut. Enforcement is already lax.  
Keep N J natural.

Respectfully,  
Art Slott

629x

"Those who do not learn history are doomed to repeat it."

It took \$44 Billion by Elon Musk to "peel back the onion" by releasing information from Twitter to teach us that if there is anything to be learned from the recent Covid-19 government hoax, it is that some bureaucrats and politicians hold...nothing...sacred when it comes to hauling in money. Even long-term mental, physical and future-earnings damage done to American children in most states was ignored by those, who stood to profit.

The simple truth is that the most recent brain child of a coalition of one politician and his cronies, bureaucrats and profiteers (whose only interest in our neighborhoods is how much money...THEY...can make) will result in the further decimation of our cherished forests and the animal kingdom that resides in it! To that politician and his cronies: "We sent you to Trenton to protect us...not work against us in the name of profiteering!" With reference to the "Science" Advisory Panel - please don't insult our intelligence. Please refer to my first and second paragraph.

There is...no.. benefit to the citizens of NJ nor one good reason why this sugar-coated scheme should be implemented.

Thank you for the courtesy of your attention and wisdom in recognizing that this is nothing more than a multi-sugar-coated political, bureaucratic and profiteering scheme.

Sincerely,

Ann Smulewicz

630x

There are too many issues to mention now. Here are but a few....

1. Too much discretion is left to a science advisory panel that cares not for animals and will support more timber sales that will destroy habitats.
2. Market hunting opposed by both hunters and non hunters and is an inappropriate use of Public land.
3. Scientists have found that insects and invasive jumping worms have been the cause for most of the damage being blamed on the deer.

This entirely slanted report will be used to craft legislation detrimental to the forest and the wildlife & deer population.

Please see this report for what it is....**PROPAGANDA !**

Yours truly,  
Ruth S. Snediker

631x

- I oppose the NJ Forestry Task Force Report because it wrongly pins the blame for deforestation on deer as opposed to much more prevalent harms of logging, development, and climate stress. I urge you to oppose this misguided proposal as well.

Deer used to live in harmony with the forests and woodlands until white settlers came along and offset this delicate balance by clear cutting, stopping wildfires, and encouraging human growth at any cost. I don't know of any intact forests that have been decimated by its deer population? Yet time and time again, we have seen around the world how human activities such as clear cutting, development, and pollution do extreme harm.

Nature is resilient, if we allow the apex predators to thrive, (ie: disallow "sport hunting"), deer populations will be kept in check and the forests will be much healthier.

Also, wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands. Recycled wood products are the future and we need to be moving away from our exploitation of all things we share this planet with.

- Thank you for your time and attention to this matter.

Sara Soens

632x

I oppose the NJ Forestry Task Force Report. It is bad for our forests and horrible for our wildlife. We don't need fake reasons to kill more animals.

Claudette Stulz

633x

## Senate Environment Committee:

I strongly oppose the New Jersey Forestry Task Force Report, because it is bad for wildlife and bad for forests. The proposed legislation would have a detrimental impact on New Jersey's, forests and wildlife, particularly its deer.

The Report demonizes deer while developers and logging companies continue destroying forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.

Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.

Too much discretion is left to a "science advisory panel." We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion. The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you for your time.

Sincerely

Wendi Swaffield

635x

To whom it may concern,

I oppose the New Jersey Forestry Task Force Report because it is bad for wildlife and bad for forests.

Jeanne Sylvester

636X

To Whom It May Concern: I oppose the above-cited report for a variety of reasons:

- The Report demonizes deer while developers and logging companies are permitted to destroy forests. It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable. Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- Wood from state forests should never be sold. The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion.
- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals.

The proposals set forth in this Report are bad for the environment, the future of forests in NJ, and for wildlife. It should not be adopted.

Catherine Tamasik

637x

Dear Senator Smith, Senator Greenstein, Assembly Member Kennedy, and the Committee Members on Environment and Energy, and the Assembly Committee Members on Environment and Solid Waste,

I am a 16 year old student of [redacted], a 2-year volunteer for Ridgeview Conservancy and a member of the NJ Forest Task Force. I moved from Boulder, Colorado to Princeton, New Jersey when I was 7, and from the moment I arrived here I was in awe of the amount of trees and forests we have. I've watched them disappear over these 9 years, and now knowing the incredible importance intact old-growth forests have to mitigating climate change, I've been inspired to do whatever I could to protect them.

I've worked to restore and protect forests for these past two years, and seen the damage that has been done to them from deer, disease, and invasive plants and animals. Almost 40% of the world's forests have been lost in the past 300 years. Another 40% is severely degraded. I've worked in healthy and degraded forests. I also recently visited Sparta Mountain to witness the aftermath of the logging that occurred, and will continue over the next several years, if there is no intervention.

During this last year, I spent many hours attending the New Jersey Task Force Meetings. While I learned a great deal from some of the speakers,....I was disappointed in the overall outcome. My disappointment was due to the following: many people who submitted a proposal were not asked to speak, with those proposals having a common theme of discussing fragmentation of forests; the language of the final report did not match with what a majority of the Task Force members wanted, indicating that the drafters of the final report held more power than the majority of participants; and the language of the final report was too vague, with loopholes that could allow for logging, whereas a majority of the task force participants were opposed to any logging and removal of material from the forests.

However, while I am disappointed in the outcome, I am grateful for the possibility of public involvement in this process. I hope we can only continue to have more of a role in making decisions which directly affect our future and our children's future.

At the NJ Forest Task Force, it has become clear that there is not yet a prescribed policy for forest management in state parks. Since this is the case, many of the Task Force members call for a moratorium on logging, until a clear forest policy is developed, with substantial public input. Of the proposals, those describing proforestation were most convincing, as this method of forest management offers a path toward climate resilience, improved water quality and enhanced biodiversity. As a young person, I feel strongly that keeping forest standing is in my generation's best interest.

I am also currently enrolled in the 2023 Rutgers Environmental Stewardship Program, and last night the speaker, Dave Specca, assistant director of the Rutgers EcoComplex, commented that it's difficult to get an initiative to take place without it being profitable. I understand that keeping New Jersey's forests intact is not profitable, but it needs to happen. Over the years, other

638X

initiatives that are not profitable have been made law, such as not allowing smoking in restaurants due to the danger to human health. Cutting down our forests brings a similar danger to human health. Forests are involved in cleaning our air, filtering our water, bringing shade and food to communities, and supporting mental health. Continuing to log our forests will limit the amount of carbon dioxide that can be sequestered, meaning that more carbon dioxide will be released into our atmosphere. This will increase the frequency and intensity of storms, contribute to rising sea levels, and negatively impact human health. For the sake of my future and the future of my children, New Jersey legislators need to ensure that our public forests are not logged, but protected.

Sincerely,

Kyleigh Tangen

639x

My name is Dana Teschlog and I live in.

I strongly oppose the NJ  
Forestry Task Force Report because it is bad for our wildlife and it's bad for forests!

640X

Dear Sir or Madam,

I am writing on behalf of my personal feelings as well as the feelings of many NJ residents and registered voters. I completely oppose the NJ Forestry Task Force Report as it is not at all beneficial to wildlife and nature. Wood from state forests should not be sold as it encourages and incentivizes the destruction of native plants on public lands. The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment. Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA. Both hunters and non-hunters alike, oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land. Lastly, One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch. I trust that these comments will be truthfully considered and a decision to side with nature will prevail.

Sincerely,

James Tomori

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It is urgent that the NJ State Legislature take steps to protect what is left of our forests that rest on public land. There are a multitude of reasons to preserve our old growth trees in the Garden State and it is not an exaggeration to say the time is now or never.

Climate change is wreaking havoc on our environment and it is impossible not to notice the erratic and unpredictable shifts in weather patterns and temperature, and the reaction of plant and animal species who are suffering. A growing number of animals are being displaced by deforestation and now seek their sustenance and shelter in areas of human habitation. This sad change threatens a number of species native to New Jersey, as they are both unable to feed and breed in the circumstances they need to survive and also as they increasingly come into contact with humans.

It is imperative that NJ takes steps to protect our natural world and I oppose stewardship plans that include removal of mature, native trees that are our best defense against climate change.

Thank you,  
Robin Trynin

642x

*I oppose  
the NJ Forestry Task Force Report  
because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you for your consideration.

Respectfully yours,  
Gayle Tunstead

643x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Regards,*

*Mrs. Terry Vaccaro*

644x

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

James Van Duyne

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Nina Van Duyne

646x

*To the Senate Environment Committee:*

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

*Sincerely,  
Alicia Van Sant*

647x

Dear Committee

- I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Please consider this.. I thank you -Virginia Vassey, NJ resident

648x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Georgeann Ventola*

649x

oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.  
Wood from state forests should not be sold because it encourages and incentivizes cutting  
down and removing trees on our public lands.

Please have a heart

Sincerely

Donna Wallace

650x

New Jersey is one of the most vulnerable states to climate change from our coastlines to our urban communities to our forests. Mature trees and forests are an essential part in the battle against climate change. I oppose any public forest stewardship plans that include removal of mature, native trees that are our best defense against climate change.

Please put policies in place to protect our irreplaceable mature trees and forests across New Jersey. Public forested lands in our densely-populated state are critical for their ecosystem services, carbon defense and protection of wildlife. Each time we clearcut trees, we put our communities at greater risk against the impact of climate change and the biodiversity crisis.

Thank you for thinking of future generations and the natural habitats that make New Jersey a wonderful home.

Kirsten Wallenstein

651x

**I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. This report is dangerous and will not benefit wildlife in any way.  
Sincerely, Gail and Doug Wallis**

Sent from:

652x

**Senate/Assembly Committee Statement**  
**Sharon Wander**

Mr. Ruga has explained to you that our decision not to support the Framework is based on the statement in Recommendation 15 that "sale of wood products" from public forests may be allowed when a forestry plan considers it "necessary" for an "ecological health" goal. "Ecological health" is **not** a term that you will find in the scientific forest-ecology literature, but it **is** one that can be deployed by foresters **with any meaning desired**, to justify any given forest-management plan. For example:

- On Sparta Mountain WMA, DEP wanted the forest managed to benefit Golden-winged Warbler, so foresters declared the forest to be even-aged (which it is not) and therefore "unhealthy". Their prescription for this "condition" was to essentially clearcut the canopy in 10- and 20-acre blocks to "restore" the young forest needed by the warbler.
- This type of management was also declared vital for making the forest "resilient" in the face of climate change—although diminishing the carbon-capturing services of the forest by cutting mature trees can only hasten that change.
- When the wholesale canopy opening on Sparta Mountain failed to attract breeding Golden-winged Warblers, the justification for logging was changed to claim that it would benefit a larger suite of bird species that typically breed in early-successional habitat and that were also declining—purportedly because of lack of age diversity in our forests.

Yes, many of these species are declining—but so are many breeding birds that need the forest-interior habitat that is being destroyed by logging:

- Since 1970, Eastern Forest bird populations have declined by 166 million, with 63.5% of species exhibiting losses, including 31 of New Jersey's 59 forest bird species. Of NJ forest birds, 2 are State Endangered, 2 are Threatened, and an alarming 21 are Special Concern.
- Bird species of early successional habitats include 3 Endangered species, 1 Threatened, and only 4 Special Concern.

**So obviously, forest-breeding birds need at least as much habitat protection as early-successional species.** It makes no sense to log the decades-old habitat needed by

653x

one group of declining species to create short-lived habitat for another group—particularly when NJ owns thousands of acres of open fields (notably on Wildlife Management Areas) where early-successional habitat could be created by **growing** trees rather than cutting them down. **Yet instead of valuing our forest birds as highly as early-successional birds, and instead of seeking creative rather than destructive solutions to their declines, DEP claims that our forests are not “ecologically healthy” and continues to log them.**

Another point mitigates strongly against the idea that NJ forests are in some way to blame for the decline of certain bird species, and must therefore be logged to provide habitat diversity. The fact is that early-successional bird species have lost **much more habitat** through the almost TOTAL EXTINCTION of insect food in forest-edge and hedgerow habitats, because native shrubs have been replaced by non-native invasive species. It has been documented that the biomass of caterpillars (the primary food of breeding birds and their nestlings) is **96% lower** in non-native vs. native hedgerows. Since virtually EVERY YARD of the thousands of miles of hedgerows and forest edges in NJ has been severely degraded by invasive shrubs, the many early-successional birds that can no longer find food in them have lost an incalculable amount of usable habitat. **Yet instead of addressing THIS critical aspect of habitat loss for birds, DEP continues to log the mature trees whose insect communities support birds in our public forests.**

These examples illustrate how vague terminology such as “ecological health” of forests in Recommendation 15 can be **misused** in forest management plans:

- to justify concentrating on one group of species to the detriment of others,
- to ignore the possible diversity of causes for species’ decline, and also
- to ignore solutions that do NOT involve mechanized cutting and the removal of wood in New Jersey’s public forests.

I hope that when these committees develop forest-protection legislation, this seriously damaging loophole will be closed so that our public forests can be managed, not by destructive prescriptions, but according to modern, creative principles such as those developed by the Society for Ecological Restoration.

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## FORESTS, CLIMATE, CARBON, BIODIVERSITY: THE SCIENCE

### SCIENTIFIC PEER REVIEWED PUBLICATIONS AND KEY REPORTS AND SYNTHESSES

January 2023 – compiled by Sara Webb, Professor *emerita*, Biology and Environmental Studies, Drew University; Board Member, New Jersey Highlands Coalition ([swebb@drew.edu](mailto:swebb@drew.edu));

#### Reports and Synthesis:

Annotated Bibliography; **Carbon, Climate, and Forest Management: Key New Scientific Findings: Intact, Unfragmented, Unmanaged Forests Maximize Carbon Sequestration and Climate Resilience.** New Jersey Highlands Coalition 2019 <https://njhighlandscoalition.org/wp-content/uploads/2022/01/Carbon-Climate-and-Forest-Management-New-Science-1.pdf>

**Policy Recommendations for Forest Stewardship and Preservation of New Jersey's Public Lands.** New Jersey Highlands Coalition. [https://njhighlandscoalition.org/wp-content/uploads/2018/11/Policy-Recommendations-for-Forest-Stewardship-for-Public-Lands\\_FINAL.pdf](https://njhighlandscoalition.org/wp-content/uploads/2018/11/Policy-Recommendations-for-Forest-Stewardship-for-Public-Lands_FINAL.pdf)

**For Climate Emergency Management of NJ's Public Forests: Proforestation and Ecological Restoration: Why Wood Belongs in the Woods!** 2023. --Leslie Sauer  
<https://njhighlandscoalition.org/wp-content/uploads/2023/01/Proforestation-and-Ecological-Restoration-.docx.pdf>

**Myths about caring for our forests: Common misunderstandings (Factsheet).** New Jersey Highlands Coalition 2023. <https://njhighlandscoalition.org/wp-content/uploads/2023/01/9-Forestry-Myths.pdf>

**Wild Carbon: A synthesis of recent findings.** Anderson, M.G. 2019 (LIT REVIEW)  
[https://issuu.com/newildernesstrust/docs/wildworks\\_v1\\_wildcarbon-2\\_1\\_?r=sZjgxYzE0OTMxNTU](https://issuu.com/newildernesstrust/docs/wildworks_v1_wildcarbon-2_1_?r=sZjgxYzE0OTMxNTU)

#### Peer-reviewed science:

To access full text, click on the doi code or past into browser.

**\*\* Latest analysis: do not miss: Forest-clearing to create early-successional habitats: Questionable benefits, significant costs (from eminent scientists): 2023.** Kellelt MJ, Maloof JE, Masino SA, Frelich LE, Faison EK, Brosi SL and Foster DR (2023). *Front. For. Glob. Change* 5:1073677. doi: 10.3389/ffgc.2022.1073677

**A synthesis of current knowledge on forests and carbon storage in the United States** McKinley, D.C. et al. 2011.. *Ecological Applications* 21(6): 1902–1924. <https://doi.org/10.1890/10-0697.1>

**Proforestation mitigates climate change and serves the greatest good** Moommaw WR, Masino SA, Faison EK. 2019. *Frontiers in Forests and Global Change*. <https://doi.org/10.3389/ffgc.2019.00027>

**Forest carbon storage in the northeastern United States: Net effects of harvesting frequency, post-harvest retention, and wood products.** Nunery, J. S. and Keeton, W. S. 2010. *Forest Ecology and Management* 259: 1363–1375.  
[https://www.uvm.edu/giee/pubpdfs/Nunery\\_2010\\_Forest\\_Ecology\\_and\\_Management.pdf](https://www.uvm.edu/giee/pubpdfs/Nunery_2010_Forest_Ecology_and_Management.pdf)

655x

**Rate of tree carbon accumulation increases continuously with tree size.** Stephenson NL et al. 2014. *Nature*. <http://www.nature.com/doi/10.1038/nature12914>

**The climate sensitivity of carbon, timber, and species richness covaries with forest age in boreal-temperate North America..** Thom et al. 2019. *Global Change Biology* 25: 2446–2458. <https://doi.org/10.1111/gcb.14656>

**Meeting GHG reduction targets requires accounting for all forest sector emissions.** Hudiburg TW, BE Law, WR Moomaw, ME Harmon, JE Stenzel. 2019. *Environmental Research Letters* 14 (2019) 095005. <https://doi.org/10.1088/1748-9326/ab28bb>

**Managing temperate forests for carbon storage: impacts of logging versus forest protection on carbon stocks.** Keith et al. (2014). *Ecosphere* 5(6):1-34. <https://doi.org/10.1890/ES14-00051.1>

**Global decline in large old trees.** Lindenmayer, D. B. et al. 2012. *Science* 338: 1305 (2021). <https://doi.org/10.1126/science.1231070>

**Global importance of large-diameter trees** Lutz, J. A. et al. 2018.. *Global Ecology and Biogeography* 27(7): 849-864. <https://doi.org/10.1111/geb.12747>

**Old-growth forests as global carbon sinks** Luyssaert et al. 2008.. *Nature* 455: 213–215. DOI: [10.1038/nature07276](https://doi.org/10.1038/nature07276)

**Degradation and forgone removals increase the carbon impact of intact forest loss by 626. %** Maxwell SL, Evans T, Watson JEC, Morel A, Grantham H, Duncan A, Harris N, Potapov P, Runtz RK, Venter O, Wang S, Malhi Y. 2019.. *Science Advances* 5(10), eaax2546 DOI: <https://doi.org/10.1126/sciadv.aax2546>

**Old-Growth forests can accumulate carbon in soils.** Zhou, G. et al. 2006. *Science* 314(1): 1417. <https://doi.org/10.1126/science.1130168>

FOR ADDITIONAL INFORMATION: <https://njhighlandscoalition.org/newjerseyforestry/>

Good morning,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Additionally, both hunters and non-hunters oppose the commercial sale of deer meat by hunters and the donation of deer meat to pantries is more of a publicity stunt, as my local food pantry says they are not interested in taking such donations.

Put forests and conservation first- not profit and logging.

Best,  
Marissa Weber

657x

Dear Environmental Committee,

This is such an important matter that I cannot express enough, my true concerns regarding the devastation that continues to be approved by NJ's small town governments. I understand that today is the deadline for receiving residents' concerns.

Ocean Township today, has little to no regard for New Jersey's Shrinking Open Space, due to the constant approvals of toxic commercial businesses, aka Gas Stations like WAWA being build next to NJ Coastal Wetlands that drain into the Atlantic Ocean. Also there is NO regard given to New Jersey's majestic wild life , whose habitat is shrinking daily, due to the continuous Planning Board Approvals by our local government. They continue to approve the clear cutting of land, to build more. Even if there is an abandoned strip mall across the street, without a tree in site!!! One of the biggest problems is this...

Local government becomes over impressed with deep pocket developers, who like to show off their cash. Fancy dinners out at expensive restaurants, to discuss their BIG ideas. These commercial developers, are not only destroying our woodlands, but they are also sabotaging Ocean Township's small town atmosphere. Our once country by the sea- side village is becoming urbanized at an alarming rate.

Allowing commercial developers to purchase historic homes, that give great character to our small town community, is wrong. Each of these properties have wooded yards and mature Tree lined streets. These Trees shade our yards and cool our sidewalks in the summer. This resent disregard, for Ocean Township Historic Character, is alarming to many historians who live in town. A majority of OT residents agree! Something must be done, before every individual charming home with historic character is replaced with a GIANT CEMENT BOX HOUSE, dwarfing OT's individually charming neighboring homes. Seasonally destroying the cozy character of small town American Capes to Victorians, including Farmhouses to Midcentury Modern. Each neighborhood from the 1920 to the 1960's has an

658x

individual style, and they are speciously placed within a property line, that has a generous amount of mature tree coverage. Back in the day, they would only cut what trees would be too close to the footprint of the home.

*Unfortunately today, builders are buying out New Jersey's small town home owners, 3 at a time. Replacing those 3 homes with one Giant Cement box like structure, without a tree left on the property. Commercial Developers are taking advantage of small town governments.... Impressing them with big ideas.*

*What makes Red Bank NJ a desired destination for shopping and Restaurants? It is the preservation of its Historic Character. We need to pay more attention to the breaking down of Monmouth County, by greedy, soulless commercial developers who are only interested in their bank accounts. We moved to Ocean Township NJ, because of its charming country by the sea, early American meets 50's Americana lifestyle. Ocean Township was a suburban dream with a country by the sea appeal. Today those in power want to chop it all away , for soulless corporate shopping centers and chain restaurants. Those paying the biggest price, for all the greed and money changing hands through cash offers , is New Jersey's wildlife. Their habit is shrinking!!! The Township's answer to this problem is an organized HUNT. REALLY!!! How do you Hunt in suburban neighborhoods. Putting our children and domestic animals at risk. STOP THE APPROVAL OF NEW JERSEY'S DEER HUNT. We love our four legged neighbors, the birds, and the trees. These are the things that attracted my husband and I to move to Ocean Township from Manhattan NY. Please push for preservation of what we hold dear...The DEER, Open Space, NJ's Coastal Wetlands. THANK YOU!*

Sincerely,

Jacqui

Jacquelyn Wenzel Jungkunst.

659x

Dear Senator,

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Thank you.

Shari Wexler

660x

Dear Senate Environment Committee Members ~

I adamantly oppose the NJ Forestry Task Force Report because of its obvious negative impacts on wildlife and the ecosystem!

We are in an era of climate change which does not appear to be in considerations here. We can't continue to destroy our forested areas for our selfish human consumption!

Whatever happened to common sense and understanding the value of the God given gift of Trees?? Trees are a valuable source for cleaning our air, providing oxygen, conserving water, fighting climate change and providing necessary habitat for our wildlife!

No!! To more deforestation and destruction and ignorance!

Michelle Weyler

GGIX

I oppose the NJ Forestry Task Force Report

Beverly Wilke

662x

Good evening, My name is Mike Wojciehowski & I am originally from Wisconsin & moved to NJ after marrying a Jersey girl. Being in and around the hunting community since age 12, I have seen first hand the multiple instances of deer density issues. Solutions: 1.) Grey wolf reintroduction (was extremely effective in WI in recent years for deer density reduction) 2.) Licence reimburse program (for each deer licence purchased , you can get your licence fee repaid back once you have orderly donated & proved it has been killed to a local hunt for hungry participant) 3.) require "Earn-A-Buck" laws upon hunters. (Example: need to kill 2 does before a buck tag can be issued) (very effective in WI) 4.) offer free "crop damage" tags to registered farmers who have deer damage issues (very effective in WI) 5.) offer property tax rebates & rent rebates of \$750 for first-time hunters, to be paid once it's been proven they have taken 2 deer off public or private lands in the state of NJ 6.) offer hide bounties for the current hunting community population. Ex: \$75 per hide, thus leading to monetary motivation to assist in deer density reduction. (Hunting is much more costly & work than most people care to understand. \$75 might not be enough) 7.) add Sundays for legal killing on State Game Lands & County, township owned lands. Hunters would prefer more than 1-day or evening per week to be able to put the time into hunting. Working Monday-Friday & only having Saturday to legally hunt doesn't lead to high success rates & committed long term hunting in the community. 8.) Authorize the sale of "only NJ sourced whitetail deer Venison meat in grocery stores." 9.) change the 6-day shotgun season to open on a Saturday, instead of a Monday every year. This alone will increase hunting participation rates. 10.) alter the current township "discharge" laws to exempt archery equipment. The term Discharge should only apply to firearms.

663x

Please accept the below testimony on today's hearing.

If the Senate Environment Committee still distributes agenda via email several days prior to the meeting, please reinstate me on that email distribution. I had been receiving it for many years, but no longer do. Has it been discontinued or was I removed?

----- Original Message -----

From: Bill WOLFE <[bwolfe@njleg.org](mailto:bwolfe@njleg.org)>

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Date: 02/21/2023 7:52 PM

Subject: Testimony on Forestry Framework recommendations

Dear Senate President, Chairman Smith, and Members of the Senate and Assembly Committees of Jurisdiction:

Please accept the following as testimony on Senator Smith's Forestry Task Force Framework document recommendations.

**The Framework Is A Formula For Status Quo Logging And Climate Neglect**

Importantly, mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an

664x

example, logging in U.S. forests emits 10 times more carbon than fire and native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth. ~~~~ **Letter To Congress By Over 200 Scientists**

A full year after it was formed, tomorrow the Senate Environment Committee Chairman Bob Smith appointed co-chairs of Smith's Forestry Task Force will present their "Framework" recommendations to an unusual joint hearing of the Assembly and Senate Environment and Agriculture Committees.

Keeping with Senator Smith's tight control of this entire process, Trenton sources tell us that there will even be Smith hand picked invited guests that will testify, but no open public testimony and certainly critics need not apply. Smith is clearly frustrated by his decade long failure to pass controversial pro-logging legislation. He created the Task Force as a vehicle to provide cover for a new package of the same old bills.

Upon its draft release for a few days of public comment during the holidays in December, I bulleted some criticisms, calling the document a "non-starter", see:

- **Legislative Forestry Task Force Recommendations Are A Non-Starter (Part Two)**

I hate to say it, but I told you this was coming. I initially tried to set guardrails and policy priorities for this runaway train, but my recommendations were not even considered and summarily rejected, see:

- **Forestry Task Force Urged To Support a Moratorium On Logging Pending Climate Reforms**

So here we are, one year later (and with even more flawed DEP forestry plans and even more PR campaigns underway, including the Pinelands wildfire plan, DEP "Natural Lands", and a new "Urban Heat Island" initiative.)

So, here's just a heads up on issues to listen closely to, because the slogans and spin will be overwhelming:

### **I) Critical Issues The Framework Ignores**

1. The Framework applies **only to publicly owned forested lands – not private lands where logging may continue unregulated. Public lands are** only about one half of NJ's forests. NJ can not protect forest resources or seriously respond to the climate crisis by ignoring half of NJ's forests:

#### **Recommendation 1:**

**The NJDEP should be directed to initiate and conduct a statewide planning and mapping process for forested public land**

The same narrow scope and restriction to public lands is applied to afforestation and reforestation:

**Recommendation 5:**

**The NJDEP should be directed to identify areas where afforestation and reforestation should occur on public lands.**

2. The Framework **explicitly grandfathers all current DEP Forest Management Plans** (like Sparta Mountain and other Highlands and Pinelands logging) and programs, including recent scientifically flawed and destructive Statewide forestry policy under the DEP Forest Action Plan and the forestry related issues in the DEP 80X50 Climate Science Report.

The Framework hides this massive loophole under the following caveat, which is presented right up front and not in the body of the recommendations:

**None of the recommendations are intended to interfere with current approved forest management plans and their associated activities.**

3. The Framework **does not recommend that science based carbon storage and sequestration goals, policies, verified quantification methods, and regulatory standards be created and enforced by DEP.**

4. The Framework makes no recommendations to regulate forest resources as forests (e.g. like wetlands, streams, wildlife, and groundwater are regulated by DEP as public resources), or to mandate that forestry practice fully comply with existing DEP regulations, like wetlands, Category One waters, Highlands, or stormwater management.

5. The Framework does not recommend: a) creation of a pro-forestation policy, b) preservation of existing forests and large old trees, c) that NJ's current narrow Reforestation Act "no net loss" law be expanded to all tree removal projects, or d) that a new urban forestry program be created and driven by mitigation offsets from development projects and additional **new carbon revenues**(not merely current law which provides just 10% of RGGI revenues). For some ideas on that, see:

- **Time To Expand NJ's "No Net Loss Reforestation Act" To Address The Climate Emergency And Environmental Justice**

The only positive recommendation (#6 – DEP to designate carbon reserves) is accompanied by a HUGE "exception" loophole that guts any carbon reserve program before it is even created. **DEP is already logging NJ forests based on "forest health" and "wildfire risks" and "carbon defense":**

Carbon reserves should be defined similar to "ecological reserves" in the Natural Areas Program as areas "managed to allow natural processes to proceed with little or no habitat manipulation **with the exception that management will occur only to address ecological or safety threats, as approved by an**

**oversight council\*\* that includes a mix of NJDEP representatives and private interests representing appropriate expertise.**

Read this excellent article for an overview of exactly what's coming tomorrow:

- **High Country News Engages in Climate Change Denialism and Greenwashing**

## **II) The Framework Recommends Flawed Status Quo Forestry And Continued Mismanagement**

In addition to the above serious flaws of omission, the Framework is equally flawed by what it recommends.

1. The Framework promotes logging and supports the DEP's current flawed policies:

### **Recommendation 7:**

**The NJDEP should be directed to identify areas where active management is needed to promote future carbon sequestration, maintain biodiversity, and to address current and future threats to ecological health.**

**This is consistent with the carbon sequestration goals identified in the NJDEP Global Warming Response Act 80x50 report,\* which discusses proactive management for carbon defense including thinning and burning.** The DEP Forest Action Plan and Pinelands and Highlands forestry plans currently justify "active management" and "**thinning**" – which are euphemisms for logging – to promote ecological health, prevent wildfire, and as "carbon defense". The Framework uncritically accepts these flawed policies (see above letter to Congress).

2. The Framework promotes expansion of current DEP prescribed burn policies and practices and supports the Prescribed Burn Act:

### **Recommendation 12:**

**The NJDEP should continue to use fire as an important management tool based upon sound science. The most significant action the agency can take on this issue is to fully implement the Prescribed Burn Act,**

In the wake of a major New Mexico wildfire that was started by a prescribed burn, the US Forest Service recognized the need to reform prescribed burn models and practices in light of new science on climate, public safety, and air quality. NJ's development and population density raise serious safety issues, yet very few people understand that the Prescribed Burn Act provided an ill advised liability exemption for damages from an out of control prescribed burn like New Mexico.

NJ also has serious Clean Air Act non-attainment public health issues for ultra-fine and fine particulates (PM 2.5), which are made much worse by prescribed burns. The framework ignores all this science. See:

- **DEP Will Hold An Important Public Hearing On NJ's Clean Air Plan For Fine Particulate Pollution (PM 2.5)**

3. Bowing to and reflecting the power of the hunting lobby – which controls much of DEP's Forestry Policy – the Framework recommends creation of a commercial market for the sale of deer meat!

**Recommendation 14:**

**The NJDEP should be directed to measure and reduce deer densities in our public forestlands to ecologically sustainable levels, with guidance from the Science Advisory Panel.\* Specifically, the NJDEP should identify and implement new and innovative steps,\*\* such as establishing a pilot program for commercial sale of venison,**  
How sick is that?

4. Cynically, under the guise of prohibiting commercial logging, the Framework actually promotes commercial logging! The Framework also supports the propaganda and bad science of the forest products industry:

**Recommendation 15:**

**The NJDEP should not include commercial profit as a goal in any forest management plan\* on public land.**

**Commercial timber management should not be a goal for any forest management plan on public land. Wood products can be sold in instances where cutting and removal of wood is a necessary part of an approved plan with ecological health, climate, or other non-commercial goals.**

The DEP currently exploits flawed and scientifically false justifications – like wood products sequester carbon and “thinning” promotes ecological health – **to justify logging.** They allow logging contractors to profit from the sale of wood by giving away timber and logged products for free, thereby masking the real costs of the logging program.

5. The Framework supports creation of carbon markets that would commodify and monetize our forests:

**Recommendation 16**

**funding to include management activities; tapping carbon markets including RGGI funding;**

**Tomorrow, listen closely to NJ “conservation leaders” as they sell out and support this garbage.**

Dear Sir

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

Further, the report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

Please take my views into consideration in your future decisions.

Yours faithfully  
CK Yoe

669x

To the NJ Senate Environmental Committee:

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone, and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.
- **One-third of New Jersey Forestry Task Force participants oppose the Report.** The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

Thank you,  
Jennifer Zarcone

670x

Hi there, I oppose the NJ Forestry Task Force Report because it's damaging to Wildlife and the forests. The report demonizes deer while developers and logging companies continue destroying forests on a daily basis.

I especially oppose the commercial sale of deer meat as it exists as a direct result of violations committed against sentient beings that are no different than dogs and cats and other animals we bring into our homes and call family. Sentience involves having a subjective experience of the world. Deer have the capacity to feel pleasure, pain, suffering, happiness, sadness, and so on. Like other mammals, deer develop deep emotional bonds with their families, and have shown to mourn in the face of someone's death. Why should we rob their individuality? Why should we take them away from their families?

Hunting is ineffective for protecting forests, cruel to the deer and dangerous to people. There are many ethical alternatives to this. Please speak with the Animal Protection League of NJ. I know you'll do the right thing. Thank you kindly,

--

**Tamir Zomer**

671x

This is to let you know tha I oppose the above mentioned N J Forestry Task Force Report because it is bad for the health of wildlife and the sustainability of our forests.

We have to preserve our forests and all the wildlife that make the forests their habitat.

Thank you.

Sincerely,  
Maria Teresa Zuger

672x

Please Stop Deer Market Hunting and Oppose the NJ Forestry Task Force Report!  
**I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests!**

Thank you

673x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.

Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

- The report villainizes deer as destroying the forests and woodlands when in fact loggers and developers are harming the environment.

- Donating hunted deer meat to food pantries does not justify hunting. In fact, many food pantries are uninterested in distributing hunted deer meat, and it is not inspected for safety by the USDA.

- Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting. Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

- One-third of New Jersey Forestry Task Force participants oppose the Report. The Report does not represent a consensus of the task force members, and as can be seen from the member statements, some members voted for the Report even though they opposed some of the proposals. Animal Protection League of NJ and the League of Humane Voters of NJ were both task force members, and voted against the Report, along with groups like the Highlands Coalition and NJ Forest Watch.

674x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

- **The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.
- **Promoting the donation of deer meat to food pantries is not good for anyone and is just a public relations stunt to make hunting more socially acceptable.** Meat from hunting is not inspected by the USDA and could contain lead shot, which is still legal for deer hunting in NJ. One food pantry has told us they have no interest in distributing deer meat.
- **Wood from state forests should never be sold.** The Report proposes allowing the sale of wood under certain circumstances, but that profit creates an incentive to cut down and remove trees, and there is never a need to cut down and remove trees in our state forests.
- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.
- **Too much trust is placed in the Administrative Procedure Act's public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.
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I oppose the forestry task force report because it has a negative impact on the NJ forests and wildlife.

Thank you.

676x

**Greetings. I oppose the report because it is bad for NJ's forests, and bad for wildlife.  
I think that the state needs to be more vigilant about safeguarding both. Thank you!**

677x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

678x

To whom it may concern,

This email is being sent to have our legislators preserve our forests & our wildlife.

As a lifelong resident of N.J., I have seen the destruction of our land & our wildlife, both essential parts of our environment. Once called the Garden State, N.J.'s forests, beach fronts & open land now has big houses & strip stores, where are all of the "environmentalists", guess they are huddling in a circle trying to come up with their next fake promise.

679x

Since animals and our forests cant speak for themselves I highly oppose this incredibly harsh erroneous report that hurts nature

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

680x

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681x

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682x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

683x

Opposed to current legislation proposed by Smith.

684x

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the forest task force is the most vicious meeting i have gone to in nj in that they seemed to have had a predetermined agenda to log nj trees and didnt want to hear about saving trees or wildlife, or birds, which depend on trees. if you log the trees, you kill nj wildlife and birds. the wildlife and birds depend on having homes in the forest. i attended virtually every meeting and they blackballed me so i was never given a chance to speak at all. not even once in many months of meetings. they had people they wanted to hear only from. it was not any way to treat an american citizen. i noticed they did this to other people who attended as well. this group of 4 (fake?) enviro groups only wanted to hear from the people they wanted to hear from and not from the nj public or citizenry. to me it is vitally important to hear from all sides and to protect our forests due to climate change and trees being so essential to holding carbon, along with the 23 other wonderful things trees do., dont allow them to be "managed", just save and protect every last tree. and dont let fake enviro groups try to say they speak for the nj public., they dont., they dont at all. i never heard them say they notified their members to check out items before they spoke out on anything., i was very disappointed by the whole encounter and seriously question whether the report of this forest task force is meaningful at all because of the way it was obtained.

Sent from: [jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)

687x

The Report is ridiculous!!!! STOP PANDERING TO HUNTERS AND DO THE  
RIGHT THING FOR NJ AND NJ'S WILDLIFE!!

688x

Since animals and our forests cant speak for themselves I highly oppose this incredibly harsh erroneous report that hurts nature

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

689x

i am the lorax i speak for the trees you should be planting millions of trees

690x

I oppose the NJ Forestry Task Force report because it is BAD for WILDLIFE and it is  
BAD for forests!!!!!!!!!!!!!!

OPPOSE OPPOSE

OPPOSE!!!!!!!!!!

691x

I oppose the NJ Forestry Task Force Report because it's detrimental/dangerous for wildlife and our environment!

692x

**I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.**

693x

Im writing to strongly oppose the NJ Forestry ask Force Report...This report is bad for our fellow being non-human animals we SHARE this earth with us and for their and our forests.Thank you I hope you agree we need yo keep moving forward morally not backwards .My name is Lisa Clark-Kahn I live in beautiful Mahwah NJ ...

5

694x

To Whom It May Concern:

I strongly oppose the New Jersey Forestry Task Force Report because it is detrimental and inhumane to wildlife and is environmentally damaging to forests.

695x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

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696x

**The Report demonizes deer while developers and logging companies continue destroying forests.** It also blames deer for deforestation when scientists have found that insects and invasive jumping worms have caused far more forest damage.

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- **Too much discretion is left to a “science advisory panel.”** We know that industry scientists will not care about animals and will support more timber sales, which destroys wild habitats.

- **Too much trust is placed in the Administrative Procedure Act’s public comment process to ensure that policies are in line with public opinion.** The Report proposes directing the NJDEP to develop forest management plans on public lands, in accordance with the Administrative Procedure Act, but we all know that the public comments are overwhelmingly ignored.

- **Both hunters and non-hunters oppose the commercial sale of deer meat by hunters, known as market hunting.** Even the hunting lobby opposes the report's proposal and says it is an inappropriate use of public land.

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I oppose the above report as I believe it encourages hunting, putting our forests and wildlife in further jeopardy from human intrusion.  
Thank you for your consideration.

698x

This is bad for our wildlife and forests. Enough!!!

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699x

I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests. Wood from state forests should not be sold because it encourages and incentivizes cutting down and removing trees on our public lands.

Thank you.

700x

*I oppose the NJ Forestry Task Force Report because it is bad for wildlife and bad for forests.*

Nj Animal Save

701x