



## New Jersey Forestry Association

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April 8, 2021

I am writing on behalf of the NJFA, a non-profit, 501c(3) organization, in support of three bills:

- **Senate Bill No. 3548(A4845):** Setting a minimum acreage goal and schedule for prescribed burns in the pinelands and Statewide.
- **Senate Bill No. 3549 (A4843):** Requiring a forest stewardship plan for certain lands acquired for recreation and conservation purposes.
- **Senate Bill No. 3550 (A4844):** Providing that municipal approval is not required for forest stewardship plans.

While expressions of support for legislation which so obviously benefits and preserves New Jersey's forests and reduces the risk of wildfires would not ordinarily be necessary, recent misstatements concerning these bills requires us to speak out.

NJFA has supported the responsible management of NJ's woodlands since 1975. I have been the President of NJFA since 2016 and a member since its founding. In all of those years, I have not personally encountered a single circumstance where a Woodland Management Plan or Forest Stewardship Plan called for wanton clear-cutting, or by design degraded drinking water, caused environmental damage, increased invasive species, impacted endangered species or harmed tourism. In fact, just the opposite results have occurred.

Similarly, it is broadly scientifically recognized that prescribed burning pursuant to plan helps ensure the future survival and regeneration of forests while at the same time reducing fuel loads in the prevention of dangerous wildfires such as we have witnessed in California.

Amazingly, you are now receiving correspondence which appears to indicate that requiring stewardship plans - not previously required - and conducting known and undisputed forest renewal methods (i.e., prescribed burning) are somehow averse to the future of NJ's forests.

I respectfully suggest that you ask yourself two simple, logical questions:

1. How can the implementation of a requirement for a forest stewardship plan - which is subject to the approval of the Department of Environmental Protection, along with regular compliance inspections by the Department - somehow be detrimental to environmental concerns?
2. How can the required application of prescribed burn - a recognized methodology of forest preservation and wildfire prevention which was signed into law in 2018 in NJ - somehow be detrimental to environmental concerns?

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The simple answer to both questions is that neither is nor can be detrimental to environmental concerns and the stated objections are obviously without basis or merit. Whatever the opponents' reasons may be, they are rooted in jargon rather than in science or logic.

### **Forest Stewardship Plans**

Frankly, it is bizarre, if not shocking, how the requirement for a forest stewardship plan - intended to ensure the sustainability of forest lands - could somehow be twisted into clear-cutting of forests and adverse environmental impacts. Clearly, the absence of a requirement for a forest stewardship plan adversely impacts forest sustainability and the environment through the total lack of planned forest conservation activities and regulation of activities on the land. We cannot fathom how anyone who professes an interest in forest sustainability could oppose this environmentally responsible requirement.

Senate Bill No. 3549 will require a forest stewardship plan for properties of 25 acres or more whenever lands are acquired for recreation and conservation purposes. Each plan is subject to Department of Environmental Protection review and approval and must conform, at a minimum, to the rules and regulations adopted by the department pursuant to section 8 of P.L. 2009, c. 256 (C.13:1L-26) designed to insure the sustainability of forest lands<sup>1</sup>. This bill will also apply to lands acquired by local governments and qualifying tax-exempt organizations for recreation and conservation utilizing constitutionally dedicated funds and would give priority to applications by them for funding of acquisition of such lands if subject to a forest stewardship plan. This is a win-win-win-win for NJ, its municipalities, its residents and most importantly, its forests.

### **Municipalities and Forest Stewardship Plans**

Senate Bill No. 3550 would prohibit a local government from requiring that forest stewardship plans are subject to its approval, thus streamlining the review process for forest stewardship plans while maintaining appropriate environmental protections. Realistically, in the state of NJ, local governments lack the time, resources and expertise to review and approve forest stewardship plans; and varying levels of local review and action can result in disparate application of environmental laws and protections.

### **Prescribed Burning**

Senate Bill No. 3548 would set a minimum acreage goal and schedule for prescribed burns in the pinelands and Statewide. Prescribed burning is a recognized, scientifically validated method of ensuring the future of forests by sustaining and regenerating natural ecology and reducing the risk of wildfire. The former is accomplished by encouraging the regrowth of surviving species and regeneration; the latter is accomplished by burning off accumulated fuel on the forest floor. Legislation regarding the use of prescribed burning - the Prescribed Burn

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<sup>1</sup> The NJ Forest Stewardship Regulations Plan Criteria (N.J.A.C 7:3 Subchapter 5, 7.3-5.2) provide in pertinent part that: ***"Management of the forest land and its natural resources under the plan shall be based on the principle of conservation. That is, the plan shall be designed to sustain the productivity of the forest land and its natural resources in perpetuity."***

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Act - was signed into law in NJ in 2018. P.L.2018, c.107 (C.13:9-44.11 et seq.) The adoption by NJ of the Prescribed Burn Act has been universally praised and placed NJ among other forest protective/wildfire aware states.

### **Forest Stewardship is Responsible Planning for Forest Sustainability**

While certain opponents of these bills like to use fear-mongering jargon like “clear-cutting” and “logging,” those words are hardly synonymous with a forest stewardship plan. In fact, forest stewardship plans are an integral component of forest sustainability. A forest stewardship plan includes a multitude of activities and considerations designed and scientifically proven to promote forest health and sustainability, biodiversity, protection of water resources, the sustaining and reintroducing of wildlife species and even historic features found on a property. Forest Stewardship Plans have long been encouraged and supported by the USDA Forest Service and NJAC 7:3 (Chapter 3) was amended in 2017 to include provisions relating to NJ’s Forest Stewardship Program.

In addition, let’s not forget that the stewardship plans involved here are formal documented plans prepared by qualified professionals in accordance with law and regulation and reviewed and approved by the Department of Environmental Protection, with the properties periodically inspected for compliance.

### **NJFA Supports all Three Bills**

- **Senate Bill No. 3548:** Setting a minimum acreage goal and schedule for prescribed burns in the pinelands and Statewide.
- **Senate Bill No. 3549:** Requiring a forest stewardship plan for certain lands acquired for recreation and conservation purposes.
- **Senate Bill No. 3550:** Providing that municipal approval is not required for forest stewardship plans.

These bills are grounded in science and logic and will result in the improved sustainability of NJ’s forests, protection of NJ’s environment, protection of NJ’s habitats and wildlife, enhancement of recreational opportunities in NJ and reduction in the risk of wildfires in NJ. Opposition to these bills is couched in baseless jargon and denies science.

Delay will only exacerbate the lack of protection for NJ’s forests and increase the risk of wildfires. All three bills should be passed and signed into law immediately.

If we can be of any further assistance, please don’t hesitate to contact NJFA.

For the NJFA:

*Andrew Kimm*  
Andrew Kimm, President