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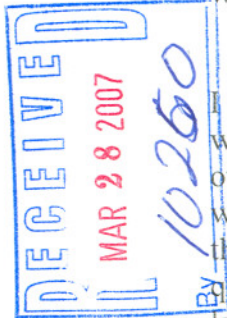
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January 17, 2007 Highlands Council Meeting for public comment on the draft Regional Master Plan, Voorhees High School, Lebanon Township

My name is Heather Gracie-Petty and I am President of Gracie and Harrigan Consulting Foresters, Inc. in Far Hills, New Jersey. I am a Certified Forester, by the Society of American Foresters and have provided professional management services to landowners within the Highlands Region since 1984. Our firm works with over 500 woodland owners within the Highlands Region.



I come to you this evening to address some of my immediate concerns that I have found within the draft RMP *Ecosystem Management Technical Report*. Our firm, along with other leading foresters, has worked diligently towards providing the Council and Staff with the scientific data that supports forestry as it relates to water quality. It is no secret that properly managed and maintained forests are a major component for providing water quality. Why then is it so strongly felt that further regulation placed on the forest landowner will ultimately provide the mechanism for water quality and protection? Where is the science!! Where did the 34 page report on sustainable forestry go as it was distributed and so well received at the Sustainable Forestry Technical Advisory Committee at the "charette" back in March of 2006? When it comes to water quality, is it just the quantity of the forest or is it also the quality of the forest?

Forest activities conducted in accordance with an approved woodland management plan pursuant to the Farmland Assessment Act are exempt under section 30a (7) of the Highlands Water Protection and Planning Act. Now here are some of the devils in the details: Due the minimal time that I have to speak I will present just a few of my concerns and follow up with additional written comments to the Council. My colleague, Christina Harrigan, is also here today and will also present other concerns of our firm.

A: page 53, par 8. *Inspection of forest harvesting sites should be performed both prior to, and post harvest to ensure that best management practices are sufficient for water quality protection.* Would this mean that an *exempt* forest landowner will need to work with their forester in providing notification and a harvest plan to the NJ Forest Service each time they want to go out in their forest to harvest trees that were marked by their forester as part of a forest improvement program? Economically, a harvest report along with pre and post inspections would add an increase to their costs and therefore be a disincentive for practicing good stewardship. In addition, this measure would be duplicative and would cost the land owner between 15% and 25% more in implementing each recommended forest activity under their *Approved Forest Management Plan*.

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Woodland properties are already periodically inspected by the NJ Forest Service and also at regular intervals by the consulting forester. In addition, if harvesting activities are to take place in, or equipment is used to cross open waters or wetland, there is already an adequate inspection and regulatory regime in place.

B: page 53, par 7, *Any timber harvesting should be completed under the supervision of an approved forester under the auspice of an approved forest management plan by an approved logger (?)* What is an approved logger and why and who will decide this? There are many reputable wood harvesters throughout the region, and foresters and landowners need good loggers to carry out proper forest management practices. Why would a forester recommend a *bad* logger? What if a landowner harvests their own wood? Again, more regulatory layers and cost placed on the forest landowner.

C: page 51, 6.8.1 Limitations in Existing Forestry Practices, par 1, *The majority of forest management occurring on private land is directly linked to qualifying for property tax reduction under the Farmland Assessment Act.* My comment here is that most states offer similar incentives. Woodland management can be very costly with little or no great economic return in the short term. Tax reductions can help to offset a portion of these costs and give the landowner the time and ability to make the best decisions for the land, and in certain instances, for estate planning to help keep the property in tact for their family and future generations.

D: page 51, 6.8 Sustainable Forest Management Practices

Foresters work with landowners toward implementing sound and sustainable forestry practices. Some of these activities include the manipulation of forest vegetation to improve forest quality and growth, tree planting, non-native and invasive plant control, and wildlife habitat improvement and restoration. Many of these landowners qualify for tax relief under the Farmland Assessment program. The Highlands Council does not have the authority to include imputed values in the RMP as a substitute for the income requirements under Farmland Assessment Act. Foresters already recognize the importance non-commodity activities and encourage landowners to apply them as part of their sivilcultural practices even through they are not mandated by law. This would take a constitutional change to the Farmland Assessment Act. **Foresters, forest landowners and others in the agricultural community would need to be part of this process.**

E: page 52, par 4 Sustainable Forest Management Practices and Policy Gaps

Statement that small forest landowners are overcutting in order to meet the fiscal requirements: Responsible foresters guide small forest landowners to diversify their farm activities to meet the fiscal requirements under the Farmland Assessment Act. According to the 1987 amendment to the FLA, unnecessary and excessive cutting leads to the removal from the FLA program. This problem is not with the Farmland Assessment Act, but rather a small group of people who think that *any* cutting is unnecessary and excessive.

Respectfully submitted,


Heather J. Gracie-Petty, SAF, CF, Certified Tree Farm Inspector