

**Willig, Robert A.**

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**From:** [REDACTED]  
**Sent:** Friday, November 1, 2019 10:38 AM  
**To:** ACRE Shared Mailbox  
**Cc:** [REDACTED]  
**Subject:** ACRE complaint  
**Attachments:** doc03131220191101104149.pdf

To whom it may concern,

Attached is an ACRE complaint submitted by [REDACTED] on behalf of [REDACTED]. Please contact me with any questions or concerns.

Thanks,

[REDACTED]

Click [here](#) to report this email as spam.

10/31/2019



PA Office of the Attorney General  
Robert A. Willig  
Senior Deputy Attorney General  
1251 Waterfront Place  
Mezzanine Level  
Pittsburgh, PA 15222

Dear PA Office of the Attorney General:

I am writing you today to bring attention to a Forestry Ordinance that we believe is in violations of the ACRE Law. For over a year now, we've been working with Upper Saucon Township, Lehigh County to approve a timber harvest for [REDACTED]. Several attempts have been made to work with the township to modify sections of the ordinance that are problematic under ACRE.

We have two main concerns. The first being the requirement 517.B.1.C Required Approval of a Forest Stewardship Plan. This requirement is in violation of the Municipalities Planning Code in that it attempts to supersede state law pertaining to timber harvesting. The Forest Stewardship Program is an excellent resource for private forest land owners to develop long term forest managements goals, but isn't right for every landowner. This is a voluntary program which is not required by state law for many reasons. Please see attached letter from John Nissan, DCNR Bureau of Forestry Forester.

We also would like to challenge the validity of 517.D.1.J No timber harvesting buffer zones. The Upper Saucon ordinance 517.D.1.J. states "Unless superseded by the Erosion and sedimentation control regulations contained in Title 25 Pennsylvania Cole, Chapter 102...". The standard E and S Plan for timber harvesting operations does not require buffers. This plan supersedes the township requirements, the timber harvesting buffers zones cannot be enforced. Please see attached SFI Acre summary sheet.

I have attached the ordinance in question, our submittal to the township, and the township's response. I can be reached by email or at [REDACTED] if you have any questions. Thanks for your assistance.

Sincerely,

