

From: [REDACTED]
Sent: Thursday, April 3, 2025 5:04 PM
To: Willig, Robert A.
Subject: [EXTERNAL] Re: Lower Macungie Twp timber harvesting ordinance-ACRE non compliant
Attachments: Lower Macungie Twp timber harvest ordinance.pdf

Robert,

I highlighted the areas I found problematic and will provide a few notes on some of them that you may question why I am opposed to the specific language.

1) While it is a good practice for landowners to have defined forest mgt goals and cutting prescriptions to match those goals, I feel this is excessive for a township to require these documents.

2) Requiring Conservation District review, I believe this has already been found to be non-compliant w/ ACRE.

7) Requiring uncut buffers along streets and adjoining properties.

8) ~~common~~ along streams/wetlands.

19) Re: requiring the trees to be marked. While this is an industry norm in the region, marking of trees is not always required to practice good forestry. Especially in lower value stands that are to be treated primarily to thin/improve the stand structure, it is common to have a verbal cutting description. While this verbal description should also be written in on the timber sale contract, it should not be a required document in an ordinance. Sometimes the cost of marking the low value trees can make an already low-income sale, even lower income when considering the expense of the labor to mark the trees. Regions in NE US and areas where large tracts of forest are being managed are often treated with a verbal cutting description (mainly for improvement thinnings).

27) on site processing: whole tree chipping is a fairly common practice in PA, would WTC be considered on site processing?

10-306- Replacement Trees: This is way beyond the scope of what a twp should require. They also refer to showing trees on a timber harvest plan which is not discussed or explained anywhere else in the ordinance.

I have not reviewed (not found a listing) of the application fees, but the landowner notes on the bottom mention \$200 with some additional fee for a certain amount of acres (I believe). I am more concerned about the language mentioned above than what their fee is. I am sure that if they re-vamp their ordinance to comply with ACRE, that any application fees would be reviewed and required to be "reasonable".

Thanks,