

**Willig, Robert A.**

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**From:** [REDACTED]  
**Sent:** Tuesday, June 17, 2025 9:44 AM  
**To:** Willig, Robert A.  
**Subject:** Re: [ EXTERNAL ] Lower Milford Township Timber Harvest Ordinance

[REDACTED]  
[REDACTED] the items  
below are what violate the ACRE Law:

1. An application fee of \$1,000, plus it states that an erosion and sediment control permit will be required, and the fees will be charged in accordance with the foregoing fee schedule. The zoning officer sends the application to the engineer for review and she sent me copies of the engineers invoices for the last issued timber harvest permit. I tried to tell her that these expenses should fall on the Township and not the applicant.
2. On the timber permit application, it states that a Professional Service Agreement and also a Site Restoration Agreement is required but the zoning officer could not explain or show me an example of either.
3. 31.C.2 - plans should indicate any significant natural features on the property including steep slopes, wetlands, riparian buffer zones, known Heritage Trees or Heritage Vegetation. The township has determined what they consider to be a "heritage tree" by species and diameter. Heritage trees are not allowed to be cut unless you get a special exemption. I currently have a client in their township that has a very old growth stand of timber and all of his trees would be considered heritage trees.
4. 31.C.3 - Identification or classification of woodland or woodlands including areas of forest interior habitat where the timber harvesting operation is proposed to occur, as indicated on the Lower Milford Township Woodland Classification Map. The township has their own classification system for woodlands and what they will allow you to harvest within those areas.
5. 31. G & H - In all woodlands, a minimum percentage of forest canopy trees shall remain after the completion of any timber harvesting operation, as set forth in the table below. Remaining forest canopy trees shall be well distributed throughout the area subject to the timber harvesting operation. H: At least 30% of the required remaining forest canopy trees, as provided above, shall be comprised of Higher Value Species. Where the number of trees comprising Higher Value Species that exist prior to the approval of any timber harvesting operation, is less than the number which would be required to comply with this provision, no Higher Value Species may be harvested. These two stipulations could prevent us from conducting the correct forestry practice to ensure we regenerate the dominate species for that site. Plus, all native hardwood trees should be considered Higher Value Species and not by their market value. So I am not sure who at the township determines what the higher value species are.
6. 31.K - A forest stewardship plan must also be submitted and the Township may request a formal review by the DCNR County forester or hire its own forest management professional to review the plan and the cost to review the plan must be paid by the applicant.

These would be the sections that I am pretty sure violate the ACRE Law.

[REDACTED]