

from Karen Bennett <kbennett@ceunh.unh.edu>
to Erik Schilling <eschilling@src-ncasi.org>
cc kferrare@ceunh.unh.edu
date Mon, Apr 19, 2010 at 8:32 AM
subject Re: NCASI Comments on NH Good Forestry Draft
mailed-by ceunh.unh.edu

Mr Schilling,

Thank you for your comments about the draft of Good Forestry in the Granite State. They will be included as part of the public comment for the second draft.

Karen Bennett

At 08:43 AM 4/15/2010, you wrote:

Karen:

Please accept the attached comments from the National Council for Air and Stream Improvement, Inc. regarding the proposed revisions to the Good Forestry in the Granite State document. I appreciate the opportunity to review the draft.

Best regards,
Erik

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Erik B. Schilling, Ph.D.
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April 12, 2010

Ms. Karen Bennett
 University of New Hampshire
 131 Main Street
 210 Nesmith Hall
 Durham, NH 03824

Dear Ms. Bennett:

The National Council for Air and Stream Improvement, Inc. (NCASI) is an independent, non-profit research institute that focuses on environmental topics of interest to the forest products industry. NCASI supports research and provides technical support to its Member Companies on issues related to forest watershed management and best management practices (BMPs).

I am submitting these comments on behalf of NCASI and in response to the request for public comment on the draft update of *Good Forestry in the Granite State*. The draft provides a substantial amount of useful information about forest management and related environmental topics.

Our main concern is that the draft “recommends” a set of standard prescriptions for Riparian Management Zones (RMZs). These standard prescriptions are problematic for two reasons.

- The standard prescriptions are not consistent with legal requirements for RMZs under the state’s basal area law (RSA 227-J:9). Such inconsistency has potential to (a) cause confusion among forest managers and landowners, and (b) undermine support for the state’s BMPs by indicating that some aspects of the BMP are not “recommended.”
- The standard prescriptions consist of recommended widths for RMZs and no-harvest zones for several size classes of streams and ponds / lakes. The draft implies incorrectly that scientific justification for standard prescriptions can be found in Verry et al. (2000). The draft itself notes that (a) forest managers should consider site-specific factors when making RMZs prescriptions that go beyond legal requirements; and (b) “There may be valid ecological and silvicultural reasons to harvest in the ‘no-harvest zone.’”

Good Forestry in the Granite State should not recommend a set of standard RMZ prescriptions based on a single factor (i.e., stream width or pond / lake area). Instead, the document should provide additional guidance regarding factors to consider when making site-specific RMZ prescriptions. In particular, it would be helpful to suggest indicators of “ecologically sensitive or

unique natural features” associated with streams and ponds that could assist forest managers in identifying sites where special RMZ prescriptions may be needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Schilling". The signature is written in a cursive, flowing style with a large initial "E".

Erik B. Schilling, Ph.D.
Senior Research Scientist