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to kferrare@ceunh.unh.edu  
date Mon, Apr 19, 2010 at 8:46 AM  
subject Fwd: GFGS Comments  
mailed-by ceunh.unh.edu

Karen:

Attached are my comments on the second draft of GFGS. I apologize if there are any typo's (I am sure there are!).

Ed

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**GOOD FORESTRY IN THE GRANITE STATE  
COMMENTS BY  
EDWARD G. WITT, SR.**

April 9, 2010

Karen Bennett  
131 Main Street  
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Dear Karen:

I want to thank you and the committee for presenting Good Forestry in the Granite State (GFGS) for a second round of comments. I have read many of the chapters and feel that you have made some substantial positive changes. I commend the committee for listening to the feedback and making changes reflected by that feedback. I would like to provide some comments on the second draft.

**GENERAL COMMENTS**

I agree that this document should not be labeled

**SETTING OBJECTIVES**

This chapter is an excellent addition to GFGS. I would like to suggest that a form be developed that reflects the content in this chapter. I find that most people (landowners) are more successful in conveying their objectives when they are presented a form with specific questions and a list of potential answers. Many times there are potential objectives that may be available to a landowner that the landowner is not aware of. I also think that it is important to “make” a landowner prioritize their objectives. Without prioritization a landowner will want it all when it may not be possible to accomplish every objective on their property. This comment is based on my experience of trying to “pry” objectives from a landowner.

## **STEEP SLOPES**

Under Considerations, there is no quantitative number associated with the steep slope designation i.e. how many lineal feet or area of a slope over 20-35% qualifies as a steep slope? On most woodlots there are short pitches that exceed these parameters and, or, are very small in area. These small areas are much less sensitive than larger areas or longer pitched steep slopes. Some designation or statement to this effect should be noted so that all steep slopes don't get lumped into the more sensitive sites (both environmentally and aesthetically).

Under Recommended Practices, fourth bullet: I would change this bullet to read: "Minimize the visual impact of clearcuts on steep slopes by employing landscape design methods that mimic natural landscape level occurrences in the area." I recognize that a clearcut on a steep slope temporarily increases run off and is potentially an eye sore to some people. The main concern with the runoff is skid trails and that issue is addressed. The aesthetic issue is important and can be addressed by designing clearcuts to mimic the landscape in the area. I do not feel that it is appropriate to limit the use of a clearcut on a steep slope to salvage operations and when regeneration is established. Landowners should be able to implement legitimate silvicultural harvests on steep slopes. To support my first comment under this chapter, size matters. The larger the harvest on the steep slope, the more impact it has aesthetically and potentially with erosion.

The term clearcut is used in many areas and is not defined. This term should probably be defined somewhere in GFGS.

## **VERNAL POOLS**

Vernal Pools are a serious concern to landowners because they are somewhat common on the landscape increasing the potential impact of "restricted" management around them. In reviewing information from Maine, they use a "vernal pool protection area" of 100' and an "amphibian life zone" of 400'. I would like to suggest that New Hampshire adopt 100' as the "breeding habitat" and 400' as the outer limit of the "core habitat". While there may be some debate surrounding these distances (additional research is needed), I think that New Hampshire should adopt the less restrictive numbers. At 400', this buffer still represents at least 11.5 acres per vernal pool which is a substantial area.

Under Considerations, seventh bullet, fourth sub-bullet, I feel that the tone is somewhat negative and could be rewritten to read: “The effects of temporary forest openings are less in a forested landscape than in a developed one.”

Under Considerations, seventh bullet, fifth sub-bullet, I would change to read: “As forest opening size increases, the effects of habitat drying...increases. However ... acres. In most cases, the effects of timber harvesting ... regenerates.”

Under Recommendations, first bullet, insert “should” instead of “could”

Fourth bullet, change distance to 100’.

Fifth bullet, **this should not be left open ended**. I would recommend that it read “From 200 feet to 400 feet.

## **STREAM CROSSINGS AND HABITAT**

I have some tone issues with the beginning of this chapter. I understand the need to identify potential impacts to streams but feel that painting all stream crossings in a negative light is not appropriate. Poorly designed and installed crossings will have negative consequences. Well installed crossings will not have negative consequences. With that in mind, I would suggest the following changes:  
Under Background, remove the last three words in the first sentence “and impede stream flow.”. In the second paragraph I would change the third sentence to read:” A healthy population also depends on unrestricted gene flow and *poorly installed* crossings ... extirpation.”

## **SOIL PRODUCTIVITY**

This condensed chapter is much improved. I still have an issue with one recommendation. The last bullet “Take a conservative ... nutrients.” The entire forest industry in New Hampshire is dependent on the whole tree chip market. This includes sawmills, pulpmills, firewood dealers, and especially loggers and biomass plants. I believe that it is irresponsible to even suggest that landowners be conservative and restrict whole tree harvests in any way except for those soil conditions that are proven to be critically sensitive to the nutrient loss. All biomass harvests result in some branches and small trees being left on site so the first sentence is unnecessary. The second sentence goes too far and if implemented on even a small percentage of woodlots, would have a significant impact on the entire forest products industry.

## **BALD EAGLE WINTER ROOSTS**

Under Recommended Practices, bullet number two; this is too much to expect and very dangerous to recommend. If F&G knows where these sites are they should contact landowners and make them aware of the significance of their forestland to eagles. A broad statement like this is very dangerous i.e. picked up by a conservation commissions and written into law. How is a landowner to know if they are within ½ mile of a roosting site? This represents over 500 acres per roost site. NHF&G needs to step up and be more vigilant about contacting landowners who they want to alter their management practices. This needs to be corrected.