

October 14, 2020

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Mr. Patrick Hackley, State Forester and Director
New Hampshire Division of Forests and Lands
NH Department of Natural and Cultural Resources
172 Pembroke Road
Concord, NH 03301

Dear Mr. Hackley:

Thank you for accepting the Forest Society's comments regarding the 2020 New Hampshire Forest Action Plan. We appreciate the leadership the Division of Forests and Lands took in developing it. As a stakeholder in the planning process, the Forest Society also appreciates the continuing opportunity to serve as a partner to the Division of Forest and Lands as it begins to implement the 2020 Plan.

We want to acknowledge the Division efforts to describe the critical questions and challenges facing the forests in New Hampshire. The Goals-Strategies-Action section in particular highlights the areas which need to be prioritized in order to keep the State's forests as forests. For example, the plan stresses how climate change is negatively impacting forests but, just as importantly also notes the valuable role they can play in mitigating those negative effects.

The plan also correctly links sustainable forest management with a strong forest-based economy. The availability of markets for sustainably harvested timber is an important factor in the protection of New Hampshire's forest landscape. Furthermore, it also underlines why conserving large, contiguous forest blocks is key to maintaining the forest based economy as well as other important values like wildlife habitats and water quality protection.

We believe the 2020 Plan would be further strengthened by the inclusion of the following points:

- Forest Ecology- In addition to noting the importance of species diversity for promoting resilience and wildlife habitat, the plan should also note the role age and size class structural diversity play in achieving those goals. We would also suggest this section mention how invasive insects are disturbing forest biodiversity.
- Forest Health- We agree that trade or commerce can be insect and disease distribution pathways and therefore can present risks to urban forests. However, rural forests face similar risks and should also be the focus of efforts to minimize impacts invasive plants, insects and diseases. Related to that point, we also suggest the plan mention the Forest Pest Advisory Group's actions in developing action plans to deal with forest pest problems.
- Forest Industry- We support the plan's call for the support and enhancement of the existing forest products industry, including low-grade wood markets, and the development of new forest products markets. We would add that the Covid19 pandemic, the Jay Mill explosion, and the closing of several biomass plants have all led to a critical downturn in the low-grade markets. The plan should include an updated description of the most recent status of the markets and if possible, more current statistics in order to reflect the state of this market and the need to act on this problem.

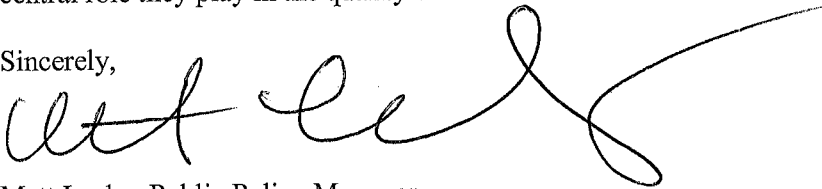
We are pleased it emphasizes education and outreach. Doing so will be critical to effectively implementing the overall plan. Although private forest landowners own three-quarters of the state's forestland, the general public benefits from the sustainable stewardship of this resource. Outdoor recreation, tourism and clean water are just a few of the ecosystem services forests provide us.

In particular, we would note that recreational pressure on forests is intensifying. This situation represents an opportunity to educate recreationists' understanding of the benefits of working forests. Sustainable forest management is key to keeping forests as forest. In many cases, it allows for public recreational access. It is therefore vital the plan engage this specific group of stakeholders to increase their recognition of the value of working forests.

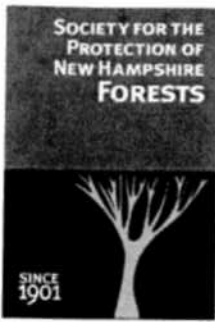
Finally, the plan should also engage sectors of the public that historically have not felt connected to forests or have not been considered stakeholders. This step can help to respond to the current societal focus on inclusion and equality while increasing the public's appreciation for maintaining working forests.

Thank you again for accepting these comments. The Forest Society welcomes the continued opportunity to support the Division's efforts to protect the health of New Hampshire's forests and to promote the central role they play in the quality of life in our state.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Leahy', with a long, sweeping horizontal line extending to the right.

Matt Leahy, Public Policy Manager
Society for the Protection of New Hampshire Forests



September 27, 2019

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Mr. Brad Simpkins, Director/State Forester
NH Division of Forests and Lands
172 Pembroke Road
Concord, New Hampshire 03301

Dear Mr. Simpkins:

Thank you for accepting these preliminary comments regarding the 2020 New Hampshire Forest Action Plan. We appreciate the leadership the Division of Forests and Lands has taken to create which is the basis for in the proper management and stewardship of forested landscapes in our state. As a stakeholder in the planning process, the Forest Society also appreciates the chance to continue to serve as a partner to the Division of Forest and Lands in the development of the 2020 Plan. As you move forward with this effort, we would urge the Division to include the following broad themes in the plan:

First, the plan should stress the importance of keeping New Hampshire's working forests as working forests. By filtering drinking water, purifying the air, reducing the severity of flood events by storing water and strengthening rural economies and recreational opportunities, New Hampshire's forested landscapes benefit all citizens. Specific points related to this theme include:

- The role forested landscapes play in the protection of drinking water sources. Given the current concerns of the public with the contamination of water supplies, the 2020 Plan should strongly emphasize the direct connection between forested areas and the protection of those resources.
- The importance of maintaining current use. The program is a central option available to forestland owners who wish to hold onto their properties and is an important tool to keep forests as forests.
- The connection between managed forest areas and outdoor recreation. With the rapidly growing use of social media and the promotion of outdoor recreation as an economic driver, forest land owners are experiencing a significant increase in recreational pressures on their lands.

- The state and its partners should educate the public about why working forests are good for recreation but also inform them about the financial challenges forestland owners face to develop and maintain the recreational infrastructure.

Second, the plan should highlight the urgent need to actively develop additional markets for the low-grade wood that comprises the majority of the wood harvested in New Hampshire. These steps will be especially helpful for private forest owners' efforts to sustainably manage their woodlots for the long-term future.

We recognize state policy makers have considered during recent legislative sessions the extent to which state policy should support the use of biomass power. However, we believe the focus of state policy should also include the identification and development of these additional markets.

Third, climate change is impacting the forests in our state. The increasing number of intense storm events and warming periods during the winter months are causing land owners to adjust how they manage their forests. Such episodes will limit opportunities to conduct responsible forest management. Available research demonstrates how managing forest land in ways that promote the diversity of species of trees and ages of trees also optimizes the storage of carbon and the provision of other important eco-system services. By including this information, the 2020 Plan will assist landowners and foresters manage their land to optimize carbon storage and other ecosystem services.

Related to that point, the prevalence of invasive vegetation and pests is also interfering with sustainable forest management. Eradicating these pests from the forests is likely not a realistic goal. Therefore, forest owners will need assistance on how they can cope with the continued presence of these damaging non-native species.

Finally, the plan should foster policy makers' and the public's recognition of the central role private forest owners play in maintaining forest health. In general, members of the public do not fully understand the challenges, especially the financial ones, landowners face in managing their lands. Incorporating this goal in state policy will entail educating the public on the multiple values of working forests. We would also encourage the Plan to include a concerted public education campaign.

Thank you again for accepting these comments. As stated, the Forest Society welcomes the continued opportunity to work with the Division of Forests and Lands in the development of the Forest Action Plan and support your efforts to protect the health of New Hampshire's forests.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Leahy", with a long, sweeping flourish extending to the right.

Matt Leahy, Public Policy Manager
Society for the Protection of New Hampshire Forests